

Reconfiguration and resurfacing of the designated car parking area for the main entrance at Melksham Community Hospital, and the replacement and installation of associated external lighting.

Melksham Community Hospital,
Spa Road, Melksham, SN12 7NZ

Supporting Planning Statement



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1.0. INTRODUCTION

- 1.1 This Planning Statement has been prepared by NHS Property Services ('NHSPS') in support of an application to Wiltshire Council for full planning permission for the proposed reconfiguration of the designated car parking area for the main entrance at Melksham Community Hospital, Spa Road, Melksham, SN12 7NZ ('the Site').
- 1.2 NHSPS manages, maintains, and improves NHS properties and facilities, working in partnership with NHS organisations to create safe, efficient, sustainable, and modern healthcare environments. NHSPS has a clear mandate to provide a quality service to its tenants and minimise the cost of the NHS estate to those organisations using it. Any savings made are passed back to the NHS.
- 1.3 The full description of the proposed development ('the development') is:

Reconfiguration and resurfacing of the designated car parking area for the main entrance at Melksham Community Hospital, and the replacement and installation of associated external lighting.

Submitted Plans and Documents

- 1.4 This Statement should be read in conjunction with a number of other documents which have been submitted as part of the planning application. The following documents and drawings comprise the full application package:
- Application Form, Certificate and Fee, prepared by NHSPS
 - Plans and drawings, prepared by Kendall Kingscott:
 - Location Plan (241046-MHR-KK-XX-XX-DR-A-1000-P05 LOCATION PLAN),
 - Existing Site Plan (241046-MHR-KK-XX-XX-DR-X-1001-P03 EXISTING SITE PLAN)
 - Resurfacing Plan (241046-MHR-KK-XX-XX-DR-X-1002-P03 RESURFACING PLAN)
 - Proposed Site Plan (241046-MHR-KK-XX-XX-DR-X-1101-P05 PROPOSED SITE PLAN)
 - Design and Access Statement (November 2025), prepared by Kendall Kingscott
 - Arboricultural Constraints and Implications Assessment (November 2025) and associated drawings, prepared by RSK Hi-Line:
 - RSKHL_8795.25 TCP East
 - RSKHL_8795.25 TCP West
 - Preliminary Ecological Appraisal Report and Biodiversity Net Gain Approach (November 2025), prepared by Davidson-watts Ecology.
 - Conditions Assessments, prepared by Davidson-watts Ecology:
 - Grassland 1 condition assessment-Poor
 - Grassland 2 condition assessment-Poor
 - Grassland 3 condition assessment-Moderate

- Grassland 4 condition assessment-Poor
- Ground Investigation Report (August 2025), prepared by Red Rock Geo.
- External Lighting Design Statement (September 2025), prepared by Houghton Greenlees & Associates Ltd.
- Existing Lighting Layout and Proposed External Lighting Layout (November 2025), prepared by Greenlees & Associates Ltd.
- Surface Water Drainage Strategy (October 2025), and associated drawings prepared by JDL Consultants.
 - 24390-DR-E-01 - Drainage Layout
 - DR-E-05 – Drainage Details 1
 - DR-E-06 – Drainage Details 2

Structure of the Planning Statement

- 1.5 This Statement sets out the relevant planning background to the proposal, provides a detailed consideration of the planning merits of the development and an analysis of the Local Development Plan and an assessment of national planning policy.
- 1.6 The remainder of this Statement is structured as follows:
- Section 2 sets out the relevant background to the application.
 - Section 3 outlines the full details of the proposed development.
 - Section 4 details the relevant planning policies and National, Local and Neighbourhood levels against which the application should be determined.
 - Section 5 provides a planning assessment of the proposals.
 - Section 6 provides a summary.

2.0. BACKGROUND

Site and Surroundings

- 2.1 Melksham Community Hospital is located within Melksham South ward, in the administrative area of Wiltshire Council. The wider hospital site comprises of one and two storey buildings providing health care services. The wider hospital site is largely bound by residential properties.
- 2.2 Vehicular and pedestrian access to the hospital is provided via Spa Road to the north of the site. Public transport links are readily available, with the nearest bus stops situated circa 20 metres north and 55 metres east of the site, both along Spa Road. Melksham Train Station is located approximately is also a 26-minute walk/16-minute bus ride located 1.7km northwest of the Site, equating to a 26-minute walk or 16-minute bus ride.
- 2.3 This planning application relates to a 0.25ha area of land within the wider hospital site (see figure 1). The site currently comprises of an area of hardstanding providing 19no. designated car parking spaces, 4no. of which are accessible, and 1no. ambulance parking bay. The centre and perimeter of the Site is also occupied by areas of grass and several trees. As existing, there are also 3no. external lighting columns and 3no. external lighting bollards located within the Site (see Existing Lighting Layout drawing).

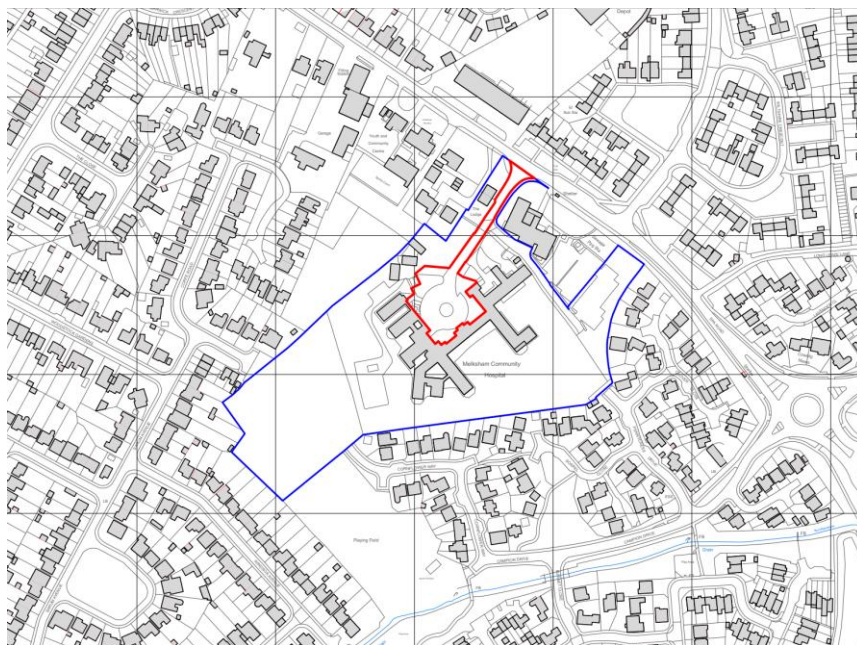


Figure 1: Site Location

- 2.4 Several areas within the site have been informally used for parking, resulting in restricted vehicular access, particularly for emergency vehicles. These constraints have raised concerns regarding the ability to maintain safe and efficient access for all users. As such, improvements are considered necessary to ensure safe, secure and continuous access across both the application site and the wider

hospital grounds.

- 2.5 The Site is located within Flood Zone 1 (low risk) according to the Environment Agency's Planning Flood Map, which means that the land is assessed as having a less than 1 in 1,000 annual probabilities of river or sea flooding (<0.1%). There is also a 1 in 100 to 1 in 1000 annual likelihood of surface water flooding within the Site.
- 2.6 There are no designated TPOs on the Site or within its immediate proximity.
- 2.7 The Site does not fall within nor is it in proximity to a designated Conservation Area. The Site also does not comprise of nor is in proximity to statutory or locally Listed buildings.

Planning History

- 2.8 The Site is not subject to an extensive planning history and has not been the subject of any major development proposals in recent years. Planning records specific to the Site made available online by Wiltshire Council identify the following:

Planning Application Ref.	Planning proposal	Planning decision
W/09/02753/FUL	Enlargement of existing public car park at Melksham Community Hospital	Granted 2 nd March 2010
W/00/01943/FUL	Change of use from residential flat to offices	Granted 3 rd January 2001
W/99/01871/FUL	Provide 24 car parking spaces	Granted 3 rd February 2000

3.0 PROPOSED DEVELOPMENT

3.1 The proposal seeks full planning permission for the:

“Reconfiguration and resurfacing of the designated car parking area for the main entrance at Melksham Community Hospital, and the replacement and installation of associated external lighting.”

3.2 As referenced in Section 2 of this Statement, as existing there are concerns regarding the ability to maintain safe and efficient access for all users within the current layout of the car park and informal parking. The application Site forms part of the wider Melksham Hospital site.

3.3 Accordingly, this application seeks to reconfigure the existing car parking area to the north of the Main Hospital Entrance. The Site comprises an area of hardstanding currently used for vehicular and pedestrian access, as well as car parking.

3.4 The proposal involves the resurfacing and reconfiguration of the existing hardstanding area to formalise parking arrangements improve access for all users of the Site, with part of the new hard surfacing provided to be permeable surface (totalling to 372m²).The development aims to enhance safety for both vehicle users and pedestrians accessing the hospital's main entrance by providing clearly demarcated parking spaces and improved circulation routes. This includes the replacement and installation of external lighting elements to support the reconfigured car parking area and new pedestrian routes, ensuring the Site can be safely navigated at all times.

3.5 The proposed development will include the provision of:

- 28no. car parking spaces, which includes 5no. accessible spaces,
- 1no. ambulance bay (as existing),
- 2no. pull-in bays, and
- New grassed areas comprising of 0.456 hectares of neutral grassland.
- Installation of 11no. external lighting columns, and
- Replacement of 3no. existing external lighting bollards.

4.0 PLANNING POLICY CONTEXT

- 4.1 Section 38(6) of the Planning and Compulsory Purchase Act requires planning applications to be determined in accordance with the adopted development plan unless 'material considerations' indicate otherwise.
- 4.2 This Section of the report highlights those development plan policies which are relevant to the proposed development as well as other planning documents representing 'material considerations'. The specific implications of these policies/documents are then addressed in Section 5 of this statement, which carries out a detailed planning assessment of the proposals.
- 4.3 The adopted development plan for Wiltshire Council comprises the following:
- Wiltshire Core Strategy (adopted 2015)
 - Wiltshire Housing Site Allocations (adopted 2020)
 - West Wiltshire District Plan – Saved Policies (adopted 2004, saved 2007)
 - Joint Melksham Neighbourhood Plan 2011-2038 (adopted 2025)
 - Planning Policy Map
- 4.4 Other material considerations are:
- National Planning Policy Framework (2024)
 - Planning Practice Guidance (last updated 2024)
 - The National Design Guide (last updated in 2021)
 - Wiltshire Local Transport Plan 2011-2026: Car Parking Strategy (2015)

Adopted Development Plan

Wiltshire Core Strategy (2015)

- 4.5 In January 2015, the Council adopted the Wiltshire Core Strategy which replaced the South Wiltshire Core Strategy and many saved policies from the former district local plans. The plan provides an overarching planning policy framework for Wiltshire for the period up to 2036.
- **Core Policy 2 (Delivery Strategy)** states that the underlying principles of the Delivery Strategy are to ensure that communities have a better balance of jobs, services and facilities and homes. The policy itself states that within the limits of development, as defined on the policies map, there is a presumption in favour of sustainable development at the Principal Settlements, Market Towns, Local Service Centres and Large Villages.
 - **Core Policy 50 (Biodiversity and Geodiversity)** requires development proposals to demonstrate how they protect features of nature conservation and geological value as part of the design rationale.

There is an expectation that such features shall be retained, buffered, and managed favourably in order to maintain their ecological value, connectivity and functionality in the long term. The policy states that *“All development proposals shall incorporate appropriate measures to avoid and reduce disturbance of sensitive wildlife species and habitats throughout the lifetime of the development.”*

- **Core Policy 52 (Green Infrastructure)** requires development to retain and enhance existing on site green infrastructure, make provision for accessible open spaces and put measures in place to ensure appropriate long-term management.
- **Core Policy 56 (Contaminated Land)** seeks to ensure that any likely form of contamination is appropriately identified and mitigated and requires demonstration of documentation, in accordance with the nature and extent of the contamination.
- **Core Policy 57 (Ensuring High Quality Design and Place Shaping)** states that *“Development is expected to create a strong sense of place through drawing on the local context and being complementary to the locality. Applications for new development must be accompanied by appropriate information to demonstrate how the proposal will make a positive contribution to the character of Wiltshire”*.
- **Core Policy 61 (Transport and Development)** seeks to ensure new development proposals achieve a suitable connection to the highway that is safe for all road users.
- **Core Policy 64 (Demand Management)** sets out transport demand management measures, which includes the provision of parking associated with new private non-residential development will be limited to the maximum parking standards (except for disabled parking spaces). This also involves traffic management measures to contribute towards lowering the risk of accidents.
- **Core Policy 67 (Flood Risk)** requires all new development to include measures to reduce the rate of rainwater run-off and improve rainwater infiltration to soil and ground (sustainable urban drainage) unless site or environmental conditions make these measures unsuitable.

West Wiltshire District Plan – Saved Policies (2007)

4.6 The West Wiltshire District Plan was adopted in 2004. As of September 2007, the Secretary of State issued a direction which identified the ‘saved’ policies that would remain applicable beyond September 26th, 2007. The following saved policies are relevant to the proposed development:

- **Policy C40 (Tree Planting)** seeks to conserve the character and appearance of an area and outlines that trees of visual amenity will be retained.
- **Policy CF8 (Community Health)** allocates the land adjacent to and including Melksham Hospital, as defined on the policies map, for the development of community health care facilities.
- **Policy I3 (Access for Everyone)** sets out the need for development proposals to consider the needs of disabled people and the provision of disabled parking spaces in relation to access around the buildings, the location of the designated parking spaces and of other public access points, and the design of the access facilities to be provided.

Joint Melksham Neighbourhood Plan (2025)

4.7 The Joint Melksham Neighbourhood Plan was adopted in 2025 and sets out the policies specific to the Melksham area within which the Site is located within. The following policies are relevant to the proposed development:

- **Policy 3 (Flood Risk and Natural Flood Management)** seeks that proposals, as appropriate to their scale, nature and location, should demonstrate how flood risk is mitigated, including demonstration of measures to reduce the amount of rainwater run-off.
- **Policy 11 (Sustainable Transport and Active Travel)** seeks that proposals, where appropriate to their scale, nature and location, should complement the Sustainable Transport Hierarchy, including the provision for ultra-low emission vehicles.
- **Policy 12 (Green and Blue Infrastructure)** supports development which will contribute to the protection, management, enhancement and connectivity of existing Green and Blue Infrastructure.
- **Policy 13 (Biodiversity)** sets out that development proposals should deliver at least 10% BNG.
- **Policy 17 (Trees and Hedgerows)** sets out that development proposals should ensure there is no damage or loss of trees of good arboricultural and amenity value. Existing trees and hedgerows on development sites should be retained where possible. Where there is an unavoidable loss of trees on site, the number and type of replacement trees should be informed by the quality and size of trees lost.
- **Policy 20 (Locally Distinctive, High Quality Design)** concerns the design of new developments, ensuring these remain sympathetic to the character of the area through high standards of design. Particularly, proposals for major development should demonstrate through a Design and Access Statement how the proposed development layout, density, access complement and extend the existing local characteristics.

Other Material Considerations

National Planning Policy Framework (2024)

4.8 The National Planning Policy Framework (NPPF) was updated in December 2024 and sets out the Government's overarching economic, environmental and social planning policies for England and how these are expected to be applied. The NPPF does not change the statutory status of the Development Plan as the starting point for decision making; however, it is a material consideration for Local Planning Authorities (LPA) in the determination of planning applications.

4.9 The NPPF states that the purpose of the planning system is to contribute to and aid in the achievement of sustainable development. The NPPF asserts that the planning system should carry a "presumption in favour of sustainable development" – a golden thread running through the creation of development plans and in the decisions taken by local planning authorities when determining planning applications.

4.10 Paragraph 8 sets out the three overarching objectives, which are interdependent and need to be

pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the objectives): economic (to help build a strong, responsive, and competitive economy); social (to support strong, vibrant, and healthy community); and environmental (to protect and enhance our natural, built, and historic environment).

- 4.11 Paragraph 11 highlights the presumption in favour of sustainable development which, for decision-taking, means development proposals that accord with an up-to-date development plan are to be approved without delay, unless material considerations indicate otherwise.
- 4.12 Paragraph 39 confirms that local planning authorities should approach decision on proposed development in a positive and creative way. Furthermore, decision-makers at every level should seek to approve applications for sustainable development where possible.
- 4.13 Paragraph 48 confirms that planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.
- 4.14 Paragraph 49 stipulates the weight local planning authorities may give in emerging plans, depending on the stage of preparation of the emerging plan, the extent to which there are unresolved objections to relevant policies and the degree of consistency of relevant emerging plan policies to the NPPF.
- 4.15 Paragraph 96 sets the aim of achieving health, inclusive and safe places, including places which:

... b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and

c) enable and support healthy lives, through both promoting good health and preventing ill-health, especially where this would address identified local health and well-being needs and reduce health inequalities between the most and least deprived communities – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.

- 4.16 Paragraph 109 sets out that development proposals should consider transport issues to ensure the delivery of well-designed, sustainable and popular places, which should involve:

...b) ensuring patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places;

c) understanding and addressing the potential impacts of development on transport networks;

d) realising opportunities from existing or proposed transport infrastructure, and changing transport technology and usage – for example in relation to the scale, location or density of development that can be accommodated;

- e) identifying and pursuing opportunities to promote walking, cycling and public transport use;*
- f) identifying, assessing and taking into account the environmental impacts of traffic and transport infrastructure – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains.*

4.17 Paragraph 115 states that in assessing applications for development, this includes ensuring that:

- ...b) safe and suitable access to the site can be achieved for all users;*
- c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code;...*

4.18 Paragraph 117 confirms that applications for development should:

- a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;*
- b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;*
- c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;*
- d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and*
- e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.*

4.19 Paragraph 135 states that planning policies and decisions should ensure that developments create places that will function well, that which establishes a strong sense of place using the arrangement of spaces, are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

4.20 Paragraph 136 stipulates that existing trees are retained where possible.

4.21 With regard to planning decisions, Paragraph 187 states that these should contribute to the natural and local environment through (d) minimising impacts on and providing net gains for biodiversity.

4.22 Paragraph 193 stresses that in determining planning applications, local planning authorities should refuse permission for development where significant harm to biodiversity cannot be avoided (through

locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for.

Town and Country Planning Act 1990, Schedule 7A (inserted by The Environment Act 2021)

4.23 From April 2024, securing a 10% Biodiversity Net Gain (BNG) became a mandatory legislative requirement under The Environment Act 2021. Schedule 7A of the TCPA (1990) sets out the objective of the BNG requirement in order for new developments to increase the biodiversity value of a site by the relevant percentage, in comparison to its pre-development biodiversity value. The associated biodiversity value is required to be calculated in accordance with the biodiversity metric.

Wiltshire Local Transport Plan 2011-2026 – Car Parking Strategy (LTP3) (2015)

4.24 LTP3 sets out the long-term strategy supporting national transport guidance at the local level. This is set out in separate strategies. The Car Parking strategy and associated policies are relevant to the proposed development:

- **Policy PS4 (Private Non-residential Parking Standards)** sets the parking standards for new private-non-residential development will be limited to maximum parking standards (except for disabled (Blue Badge) parking spaces. Maximum parking standards will be reduced to reflect local circumstances and the relative accessibility by sustainable transport modes in accordance with an accessibility framework.
- **Policy PS12 (Improving Access and Use)** stipulates the Council will promote convenient access to parking facilities, including through ensuring parking for disabled motorists is provided in line with national guidance as a minimum, parking facilities are clearly signed and facilities for service vehicles are (as far as possible) segregated to avoid conflict and their use as overflow car parking areas.

4.25 Appendix C of the document sets out the maximum parking standards, categorised by Use Class and Land Use. On the basis that no overnight accommodation is provided at the Site the proposed development Site is considered to serve and operate under Use Class D1 (now Class E) as a medical facility. The following maximum car parking standard will therefore apply:

- 5 per consulting room

Emerging Policy Context

Wiltshire Local Plan Pre-Submission Draft 2020-2038 (Regulation 19) (2023)

4.26 The emerging Wiltshire Local Plan is in the later stages of the plan preparation process and is currently under examination. As such, the policies contained in the Pre-Submission Draft has been significant weight in light of assessing the proposed development against relevant policies. The following draft policies are considered relevant to the proposed development:

- **Policy 4 (Addressing Climate Change)** states that development proposals must support the move

to carbon neutrality and adaptation to climate change. This includes through maximising carbon storage and sequestration by providing, conserving, enhancing and restoring habitats, and climate change mitigation and adaptation by delivering biodiversity net gain that meaningfully contributes towards buffering and tackling the effects associated with a changing climate (in line with Policy 89).

- **Policy 71 (Transport and New Development)** sets out the transport access and servicing factors to be considered as part of new developments. This includes ensuring a suitable and safe access to the highway network, ensuring there is provision of fit for purpose and safe loading/unloading facilities and considerations of a range of groups of people (including pedestrians, service/emergency vehicles and disabled people).
- **Policy 73 (Transport: Demand Management)** requires application of demand management measures which reflect local circumstances and objectives. This includes car parking management through parking provision in line with the relevant standards.
- **Policy 88 (Biodiversity and Geodiversity)** stipulates that development proposals will need to clearly demonstrate how the mitigation hierarchy has been sequentially applied and how biodiversity net gain, mitigation or compensations has been achieved. To ensure there is no net loss of biodiversity, development proposals must secure and implement measures including appropriate compensatory measures, where necessary.
- **Policy 89 (Biodiversity Net Gain)** stipulates that development must achieve a minimum of 20% Biodiversity Net Gain over the pre-development biodiversity value as measured by the latest Biodiversity Metric. Planning applications subject to mandatory biodiversity net gain must submit a Biodiversity Net Gain Plan at the application stage that should include details as outlined in the policy. Sites where net gain is provided (on or off site) must be managed and monitored by the applicant or an appropriate body funded by the applicant for a minimum period of 30 years.
- **Policy 90 (Woodland, Hedgerows and Trees)** states proposals for major development shall make provision for the retention and enhancement of Wiltshire's woodlands, hedgerows and trees.
- **Policy 93 (Green and Blue Infrastructure)** states that where there is unavoidable damage or loss of existing green or blue infrastructure, only the minimum necessary should be removed. Any loss must be mitigated through the creation of new or replacement green and/or blue infrastructure of equal or greater value and quality.
- **Policy 95 (Flood Risk)** seeks for all proposals to include measures to reduce the rate of rainwater run-off and incorporate SuDS.
- **Policy 97 (Contaminated Land)** states that development proposals which are likely to be on, or adjacent to land which may have been subject to contamination will need to demonstrate appropriate mitigation measures.
- **Policy 98 (Ensuring High Quality Design and Place Shaping)** requires a high standard of design in all new developments, including through consideration of the development's impact on amenities of existing occupants and on the development itself (e.g. vehicle parking, access and movement, and light intrusion), and taking account of the needs of potential users in terms of accessibility and inclusivity.

Wiltshire Local Transport Plan 2025-2038 (2025)

4.27 The Wiltshire Local Transport Plan 2025-2038 (LTP4) sets out Wiltshire's strategic transport objectives and place-based specific strategies and will supersede the LTP3 once adopted. The following draft policies are relevant to the proposed development:

- **Policy S4** seeks to influence the demand for private car use, ensuring improved access and journey time reliability for those who need it most.

5.0 PLANNING POLICY ASSESSMENT

- 5.1 This section assesses the proposed development against the adopted Development Plan and other material considerations. It evaluates the scheme in relation to key planning issues and demonstrates how the proposal aligns with both local and national planning policy objectives. The analysis considers relevant policies and guidance supported by reference to material considerations that inform the overall planning balance.
- 5.2 Given the nature of the scheme and the application site, it is considered that the principal issues for consideration are:
- Principle of Development
 - Access and Parking
 - Design
 - Arboriculture
 - Ecology and Biodiversity
 - Ground Conditions
 - Neighbouring Amenity
 - Flooding (Surface Water Flooding)

Principle of Development

- 5.3 The general theme of national, regional and local planning policy is to secure sustainable development and regeneration through the efficient re-use of previously developed urban land and through concentrating development in accessible locations. This is set out in the NPPF at paragraph 11, where it states there should be a presumption in favour of sustainable development and that proposals which accord with the development plan should be approved without delay.
- 5.4 Further the NPPF encourages the use of brownfield land, and Paragraph 119 goes on to say that the effective use of such land should be encouraged, provided it is not of high environmental value.
- 5.5 NPPF Paragraph 109 in particular sets out the consideration which should be given to transport issues and in applying the means to ensure the delivery of well-designed places, which includes identifying opportunities within existing transport infrastructure in relation to the development it sits within.
- 5.6 Wiltshire Core Strategy Core Policy 2 seeks to prioritise the re-use of previously developed land (brownfield). Core Policy 64 further details how the transport demand should be managed within developments, including through car parking provision in line with maximum parking standards (except for disabled parking spaces) and in traffic management measures to lower risk of accidents.
- 5.7 West Wiltshire District Plan saved Policy I3 also reflects the need for development proposals to consider accommodating the needs of all groups of users, including through the provision and design

of disabled parking spaces and ensuring public access points are of suitable design.

- 5.8 The Wiltshire Local Transport Plan (LTP3) Policy PS12 also reflects the above and confirms that the Council will promote convenient access to parking facilities, including through the provision of parking for disabled motorists, the provision of parking facilities with clear signage and segregated facilities for service vehicles.
- 5.9 The Site is existing developed land and is not subject to designations or allocations which would specifically restrict the proposed development on the Site.
- 5.10 The proposed development is necessary to support the safe, effective, and efficient operation of the wider healthcare facility. It addresses existing issues related to traffic flow and car parking management, and seeks to optimise the design and use, and support the operations of the existing car park area. These matters are discussed in further detail in subsequent sections.
- 5.11 The principle of the proposed development is supported by the development framework, particularly as national planning policy requires development proposals to consider and address transport issues. The proposed development is also considered to be supported by local planning policy which seeks to prioritise the re-use of brownfield land and enable the delivery of suitable car parking provision and safe traffic management measures.

Access and Parking

- 5.12 Paragraph 117 of the NPPF highlights the importance of considering transport access and movement in development proposals. This includes addressing needs of people with disabilities and reduced mobilities, ensuring safe and secure places are created which minimise scope for conflicts between pedestrians, cyclists and vehicles, and allowing for the efficient access by service and emergency vehicles.
- 5.13 The need for development to consider the effectiveness of the existing transport network and ensure safe access for all users is similarly reflected within Core Strategy Core Policy 61 and 64 and West Wiltshire District Plan Policy I3.
- 5.14 Adequate car parking provision must be made in line with local parking demand and relevant parking standards, as set out in Core Strategy Core Policy 64, LTP3 Policy PS4 and PS12, and emerging Wiltshire Local Plan Policies 71 and 73.

Access

- 5.15 As existing, vehicular and pedestrian access is provided from the north-west of the Site, via an unnamed road from Spa Road. The existing car parking arrangement is provided in a radial form around a central roundabout. In consideration of the informal car parking arrangements also present on the Site, particularly along the central roundabout, this has created narrower access ways which

causes congestion and disrupts vehicle access. At present, there is also no existing dedicated pedestrian path within the Site, and pedestrians share and utilise the existing vehicular access ways, which increases the accident risk, and has historically raised safety concerns for pedestrians accessing the Site.

5.16 The proposed development comprises of:

- A revised car parking and access layout
- Demarcated parking spaces (quantum detailed below)
- Demarcated pedestrian routes through the Site

5.17 The proposed development seeks to reconfigure the existing parking layout, including the implementation of a clearly marked one-way vehicular circulation route within the site. This revised layout also allows for the creation of a dedicated pedestrian route, linking all parking spaces and providing a safe, legible path for pedestrian movement. These improvements aim to ensure efficient and safe access for both vehicles and pedestrians across the site.

5.18 The reconfiguration of the site is designed to enhance accessibility for all users, including patients, staff, and visitors to Melksham Community Hospital. The introduction of clearly defined pedestrian paths improves wayfinding, reduces potential conflicts between different modes of transport, and supports safe and inclusive movement throughout the site.

5.19 As such, it is considered that the proposed development is in accordance with NPPF Paragraph 117, Core Strategy Core Policies 61 and 64, and West Wiltshire District Plan Policy I3 as it seeks to rationalise and improve the existing transport network and ensure safe access for all users.

Parking

5.20 The site is subject to the Wiltshire Local Transport Plan – Car Parking Strategy, which sets out parking standards for new private non-residential developments. Although the proposal does not involve a new development of this type, the site forms part of the existing Melksham Community Hospital, which falls under Use Class E (formerly Use Class D1).

5.21 Based on the 25no. consulting rooms within the wider hospital site and the adopted standards, a maximum of 125no. car parking spaces would be required. Currently, the entire hospital site provides 82no. car parking spaces, including accessible bays.

5.22 The application site relates to an area of parking within the wider hospital site. The application site currently accommodates:

- 19no. formal car parking spaces, including 4no. accessible bays, and
- 1no. dedicated ambulance parking bay.

- 5.23 However, informal parking is frequently observed, particularly around the roundabout and to the west of the site. This includes inappropriate use of accessible bays and the ambulance bay, which has led to constrained vehicular access, especially for emergency vehicles. These patterns suggest a higher parking demand than is currently met on-site.
- 5.24 The proposed development seeks to rationalise the car parking arrangement to provide clearly demarcated parking spaces, comprising of a total 28no. car parking spaces, 5no. of which will be accessible. The proposed this will also provide 1no. ambulance bay and 2no. dedicated pull-in bays.
- 5.25 All parking spaces will comply with Health Technical Memorandum 07-03 (2015), ensuring alignment with NHS standards for car parking and sustainable transport.
- 5.26 With the proposed improvements, the total number of formal parking spaces across the wider hospital site will increase to 91 spaces. This enhanced provision is expected to better meet current demand, improve parking management, and support safe and efficient ambulance access via the new pull-in bays. The reconfigured layout will also optimise the use of the existing space and address longstanding parking issues.
- 5.27 In terms of access and parking, the proposed development is therefore considered to be in accordance with Core Strategy Core Policies 61 and 64, West Wiltshire District Plan Policy I3, LTP3 Policies PS4 and PS12, and emerging Wiltshire Local Plan Policies 71 and 73.

Design

- 5.28 Paragraph 124 of the NPPF identifies that the Government attaches great importance to the design of the built environment and that good design is indivisible from good planning. This is reflected in Core Strategy Policy 57, Joint Melksham Neighbourhood Plan Policy 20, and emerging Wiltshire Local Plan Policy 98. These policies emphasise the importance of legible, safe, and accessible road layouts, with consideration for the needs of all users, including accessibility and inclusivity.
- 5.29 This application is supported by a Design and Access Statement (DAS), prepared by Kendall Kingscott. The DAS outlines the design principles and standards applied to the development, including compliance with Health Technical Memorandum 07-03 (2015), which sets NHS standards for car parking management and sustainable transport.
- 5.30 Currently, the site includes defined car parking spaces but lacks a clear pedestrian route. Informal parking around the roundabout further compromises safe wayfinding and pedestrian movement, reducing the overall legibility and safety of the site.
- 5.31 The proposed development introduces a layout with clearly demarcated roads using contrasting surface colours to improve legibility and ensure safe, accessible movement for all users. Hard kerbing will be installed around the perimeter of parking spaces to provide clear physical boundaries, enhancing the definition of spaces and creating a safe transition between hard and soft landscaping.

The rationalised layout also allows for the creation of dedicated access routes, improving legibility, safety, and accessibility, particularly for pedestrian users.

- 5.32 The proposed development seeks to enhance the legibility and safety of the site through the use of contrasting demarcation features and design principles aligned with NHS access and wayfinding standards.
- 5.33 The proposed development includes the installation of 11no. new external lighting columns and the replacement of 3no. existing external lighting bollards. Currently, the application site contains 3no. lighting columns with a grey finish and 3no. lighting bollards with a blue finish.
- 5.34 The proposed lighting columns will have a height of 6 metres and will be finished in grey aluminium. The external lighting bollards will be replaced with new units measuring under 1 metre and will also be finished in grey aluminium. The new lighting columns will be designed in a style and colour that is consistent with, and compliments, the existing lighting columns. While the 3no. existing bollards will be upgraded to incorporate a lighting element for improved functionality, their size will remain consistent with the current design. The colour change to grey will harmonise with the proposed lighting columns, creating a cohesive and visually appealing scheme.
- 5.35 These lighting elements have been designed so as to remain in-keeping with the existing external lighting elements on the site. As such, it is considered that the proposal would not result in any adverse harm to the character of the area or the street scene and is therefore acceptable in design terms.
- 5.36 For further details regarding the design and layout of the scheme please refer to the Design and Access Statement.

Arboriculture

- 5.37 NPPF Paragraph 136 seeks for the retention of existing trees, wherever possible.
- 5.38 Locally, Core Strategy Policy 52 requires the re-provision of green infrastructure of equal or greater quality where development results in its loss or damage. Core Policy 57 also seeks for development proposals to demonstrate and ensure high quality design across all new development proposals, including through justifying and mitigating any losses of existing important natural features (incl. trees). Similarly, Neighbourhood Plan (NP) Policy 17 expects replacement planting where trees of good arboricultural and amenity value are lost. West Wiltshire District Plan (WWDP) Policy C40 also supports the retention of trees that contribute to visual amenity.
- 5.39 Emerging Wiltshire Local Plan (WLP) Policies 90 and 93 reinforce these principles, with Policy 93 specifically stating that only the minimum necessary green infrastructure should be removed, and that mitigation through re-provision is required.

- 5.40 The proposal is supported by an Arboricultural Constraints and Implications Report (2025), prepared by RSK Hi-Line, which assesses the impact of the development on existing trees and shrubs. The report identifies several trees and shrubs in good condition, with no significant defects in most cases.
- 5.41 The development will involve the rationalisation and reconfiguration of the existing car park, requiring the removal of:
- A small number of shrubs (shrub groups G004 and G005), and
 - Three Category C trees (Refs: T010 and T011).
- 5.42 All other existing trees will be retained. The works will involve the construction of new surfaces and underground service installations in relation to the new external lighting columns, through which, any risk to retained trees will be sought to be reduced or prevented entirely. In line with the proposed external lighting and existing surface water drainage layouts, the existing and proposed layout of underground service runs indicate that there are no proposed additional works which will impact the RPAs of any of the trees retained on-site. It is therefore considered that the footprint of all elements of the proposed development will not encroach nor adversely impact the RPA of retained trees.
- 5.43 Given the proximity of retained trees to the development area, there is potential for construction-related impacts. To mitigate this, protective fencing and ground protection measures will be implemented during construction, in line with the recommendations of the Arboricultural Report.
- 5.44 The design has been strategically developed to retain the majority of trees, particularly those of higher arboricultural value. The removal of Category C trees and shrubs is assessed to have a low impact on the site and surrounding area, and is not considered to significantly affect the overall character or visual amenity.
- 5.45 Given that the proposal will result in the loss of lower-value green infrastructure, there is potential for trees of equal or better quality to be re-provided on-site. Measures will also be taken to preserve the condition and quality of retained vegetation on-site, particularly during the construction stages.
- 5.46 As such, it is considered that the proposed development is in accordance with NPPF Paragraph 136, Core Strategy Core Policy 52, West Wiltshire District Plan Policy C40, Neighbourhood Plan Policy 17 and, emerging Wiltshire Local Plan Policies 90 and 93.

Ecology and Biodiversity Net Gain

Ecology

- 5.47 Adopted Core Strategy Core Policy 50 expects development proposals to demonstrate protection, retention and management of features of ecological value. This is also reflected under Neighbourhood

Plan Policy 12 with regards to the protection, management, enhancement and connectivity of existing green and blue infrastructure.

- 5.48 Emerging Wiltshire Local Plan Policy 93 also reflects the above and further stipulates that where there is unavoidable loss of green and blue infrastructure, only the minimum necessary should be removed and any loss would need to be mitigated appropriately.
- 5.49 As existing, the Site comprises predominantly of developed land, with areas of grass, planted trees and shrubs located within the central area of the Site. The Site or its immediate surroundings are not subject to adopted or emerging ecological designations.
- 5.50 This application is supported by a Preliminary Ecological Appraisal (PEA), prepared by Davidson-Watts Ecology which identifies and assesses the potentially significant ecological impacts associated with the proposed development.
- 5.51 The desk-based search contained within the PEA identified impacts on statutory and non-statutory protected sites, bat consultation zones habitats of principal importance (HPIs), wildlife corridors and aquatic habitats. Findings showed that there are no statutory protected sites within the Site's proximity nor does the Site fall within a bat consultation zone that would be considered as a constraint to the proposed development.
- 5.52 Within a 2m radius, several ecological features were found which included, non-statutory protected sites (Bristol River Avon LWS and Conigre Mear WWT), 18no. HPIs, and three waterbodies and several watercourses. Owing to the distance of the Site from these features and the existing context of the Site comprising predominantly of developed land and modified grassland, ecological features including non-statutory protected sites, HPIs and aquatic habitats are therefore not considered as a constraint to the proposed development.
- 5.53 The PEA identified wildlife corridors in the form of hedgerows and trees located to the west of the Site. Whilst it is located within the wider context of the Site, the connectivity of these features to the subject Site are found to be sub-optimal. It is therefore considered that the proposed development will not significantly or detrimentally impact existing wildlife corridors located within the Site's wider context.
- 5.54 A search of suitable habitats for nesting birds, roosting bats and supporting hedgehogs is also included within the PEA. In considering the context of the Site comprising predominantly of developed land, the surveys found that there were no habitats present within the Site that would have suitably supported roosting bats. Due to the lack of suitable habitats for roosting bats present on the Site as existing, it is therefore considered that the proposed development will not significantly or detrimentally impact suitable roosting bat habitats.

- 5.55 A section of grass ('Grassland 1') within the Site was identified as a suitable site in supporting nesting birds and hedgehogs. To ensure disturbance to such habitats are kept to a minimum, the proposed development ensures vegetation clearance will be strictly kept to the required minimum and within the appropriate timeframes as recommended – September to February for nesting birds, and staged clearance for hedgehogs. Further, through the creation of neutral grassland, the proposed development will mitigate the impact on the existing grassland habitat to provide alternative foraging resources for hedgehogs, in line with the recommended enhancement options set out in Section 6.4 of the PEA Report.
- 5.56 The proposed development also comprises the installation of new, and replacement of existing, external lighting structures in line with the submitted Proposed External Lighting Layout prepared by Houghton Greenlees & Associates (September 2025). In accordance with the relevant British Standards, the installed external lighting seeks to minimise any detrimental impact of light pollution on wildlife, such as bats, using energy efficient modern LED luminaries and by taking a minimal illuminance approach, to ensure any disturbance to existing habitats are appropriately mitigated. This includes LED luminaries which will have a 0% upward light output ratio or light spill will be reduced to the absolute minimum through the use of cowls/hoods or shields with operational timers and colour temperature with selected luminaire glare rating, specifically for bat roost activity.
- 5.57 In line with the findings of the PEA, due to the Site's location and existing context, it is considered that the proposed development will not result in significant or detrimental impacts on sites or habitats of ecological value, and will seek to mitigate any impact resulting from the proposed development. It is therefore considered that the proposed development will be in accordance with adopted Core Strategy Policy 50 and Neighbourhood Plan Policy 12, and emerging Wiltshire Local Plan Policy 93.

Biodiversity Net Gain

- 5.58 Schedule 7A of the Town and Country Planning Act sets a mandatory requirement for new developments to secure a 10% Biodiversity Net Gain, in comparison to the pre-development biodiversity value as calculated in accordance with the biodiversity metric.
- 5.59 Paragraphs 187 and 193 of the NPPF also reflects this requirement. Paragraph 193, in particular, states that where significant harm to biodiversity should be sought to be avoided, adequately mitigated or, as a last resort, compensated for.
- 5.60 Core Strategy Core Policy 50 sets a similar expectation in Wiltshire for development proposals, where possible, to protect, retain and manage features of ecological value and seek opportunities to enhance biodiversity, including through biodiversity gains. In line with national legislation, Neighbourhood Plan Policy 13 further sets out that development proposals are expected to deliver at least 10% BNG.
- 5.61 Emerging Wiltshire Local Plan Policies 88 and 89 also reflects the expectations of the above

requirement, with Policy 89 in particular requiring development proposals to achieve a 20% BNG over the pre-development biodiversity value.

- 5.62 As existing, the Site comprises predominantly of developed land. Areas comprising of grass, trees and shrubs are found located at the roundabout, to the north and south of the Site. This proposal is supported by a Biodiversity Net Gain Report and the Biodiversity Net Gain Metric calculation prepared by Davidson-Watts Ecology (October 2025).
- 5.63 The BNG Report details the habitat condition assessments that have been completed for the existing biodiversity features on the Site. Findings from this assessment identified the following habitat areas (see Figure 6 in the supporting Report):
- Moderate condition Modified grassland g4 – 0.0288ha,
 - Poor condition Modified grassland g4 – 0.0447ha, and
 - Developed land; sealed surface (Other developed land u1b6) – 0.1706ha
- 5.64 The proposed development will result in the loss of the entirety of the existing modified grassland, totalling to 0.0735ha.
- 5.65 The on-site proposed habitats included as part of the proposed development comprises of (see Figure 10 in the supporting Report):
- Moderate condition Other neutral grassland g3c – 0.0124ha,
 - Poor condition Other neutral grassland g3c – 0.0383ha, and
 - Artificial unvegetated, unsealed surface u1c – 0.0317ha
- 5.66 The proposed development will result in the creation of other neutral grassland varying from poor to moderate condition to replace some of the existing modified grassland lost as a result of the proposal, equating to 0.0507ha of created neutral grassland. In addition, the proposed development also includes the creation of artificial unvegetated, unsealed surfaces comprising of permeable tarmac to be used throughout the new parking bays proposed.
- 5.67 The Statutory Biodiversity Metric calculated that the proposed development would result in a total net unit change of 0.20 habitat units, which equates to a 10.3% net gain.
- 5.68 The proposal seeks to mitigate the loss of existing modified grassland resulting from the proposed development through on-site re-provision. As such, it is therefore considered that the proposed development remains in accordance with statutory requirements in achieving 10% BNG. Through the proposed development, it is considered that pre-development conditions will be improved and any loss will be appropriately mitigated.

- 5.69 Further to this, the proposed Other neutral grassland of moderate condition is intended to be legally secured under a planning condition, which will be set out in an accompanying Biodiversity Gain Plan and Habitat Management and Monitoring Plan (HMMP).

Ground Conditions

- 5.70 In instances where potential contamination is identified, Core Strategy Policy 56 requires appropriate mitigation measures to be implemented and evidenced through relevant documentation, proportionate to the nature and extent of the contamination. This requirement is echoed in emerging Wiltshire Local Plan Policy 97, which stipulates that development proposals on or adjacent to potentially contaminated land must demonstrate suitable mitigation measures.
- 5.71 This application is supported by a Combined Geo-environmental and Geotechnical Ground Investigation Report, prepared by Red Rock Geo (August 2025). The report assesses potential contamination risks associated with the site. Following ground investigation surveys, the findings indicate a low likelihood of significant contamination, and the site is unlikely to pose a risk to human health.
- 5.72 Given the low contamination risk, no remedial measures are deemed necessary as part of the proposed development. As the appropriate investigations and assessments have been undertaken and no mitigation is required, the proposal is considered to be in accordance with adopted Core Strategy Policy 56 and emerging Wiltshire Local Plan Policy 97.

Neighbouring Amenity

- 5.73 Paragraph 135 of the NPPF seeks for development to create a high standard of amenity for existing and future occupiers. Emerging Wiltshire Local Plan Policy 98 seeks to ensure the design of new developments take consideration of the development's impact on amenities of existing occupants and on the development itself in terms of parking, access and movement, and light intrusion.
- 5.74 The immediate context of the proposed development comprises of the wider Melksham Hospital site and is not in proximity or adjacent to existing residential developments.
- 5.75 The proposed development will be contained within the wider existing Melksham Hospital site and will only comprise of the reconfiguration of the existing hardstanding area providing car parking spaces, which will involve the installation of 11no. new external lighting columns and the replacement of 3no. existing lighting bollards. In considering the context of the application Site and the nature and scale of the proposed development, it is considered that the proposed development will not result in any impacts upon any neighbouring amenities or result in detrimental changes to the existing residential amenities.
- 5.76 Given that the use of the existing hardstanding area will remain unchanged, it is considered that the proposed development will not cause detrimental impacts on the existing Site's amenities in terms of

parking, access and movement. Rather, it is considered that the Site will significantly result in improvements to legibility, efficiency and safety of users with regards to access and movement.

- 5.77 The installation of external lighting columns and replacement of existing lighting bollards are needed to safely provide the required level of illumination onto the reconfigured parking bays and the new pedestrian walkway route. To which, a minimal illuminance approach has been taken to prevent the creation of any obtrusive light. In light of the illuminance approach, the position and quantum of external lighting and taking account of the immediate context of the Site, it is not considered that the proposed development will result in significant or adverse impact on neighbouring amenities in terms of light intrusion.
- 5.78 It is therefore considered that the proposed development is in accordance with NPPF Paragraph 135 and emerging WLP Policy 98.

Flooding (Surface Water Flooding)

- 5.79 Adopted Core Strategy Core Policy 67 and Neighbourhood Plan Policy 3 requires all new development to include measures to reduce the rate of rainwater run-off and improve rainwater infiltration. This is also reflected in emerging Wiltshire Local Plan Policy 95.
- 5.80 The Site is located within Flood Zone 1 (low risk) and is also at low risk to surface water flooding (1 in 100 to 1 in 1000 annual likelihood) according to the Environment Agency's Planning Flood Map.
- 5.81 This application is supported by a Surface Water Drainage Strategy prepared by JDL Consultants (October 2025).
- 5.82 The proposed development comprises of the resurfacing of the existing hardstanding area. In line with the Ground Investigation Report, prepared by Red Rock Geo (August 2025) the Report considered that soakaways would not be the most effective method for surface water drainage owing to the slow rate of percolation identified. As such, the proposed development will comprise of a mix of permeable and non-permeable hardstanding surfaces, all of which will be connected to existing underground drainage systems.
- 5.83 In including permeable surfacing, where assessed to be appropriate, the proposed development seeks to ensure that the rainwater run-off and infiltration is appropriately managed and reduced. Considering the low risk to both river and sea, and surface water flooding, the proposal seeks to incorporate measures to ensure the proposed development does not increase the existing (low) risk to flooding on the Site.
- 5.84 It is therefore considered that the proposed development is in accordance with adopted Core Strategy Policy 67 and Neighbourhood Plan Policy 3, and emerging Local Plan Policy 95.

6.0. CONCLUSION

- 6.1 NHS Property Services is seeking full planning permission from Wiltshire Council for the reconfiguration and resurfacing of the designated car parking area at the main entrance of Melksham Community Hospital and the replacement and installation of the associated external lighting features required. The proposed development is located within the hospital grounds, which provide essential primary care services to the residents of Melksham.
- 6.2 The site currently experiences constrained vehicular access and frequent use of informal parking arrangements, which have raised safety concerns, particularly regarding pedestrian and patient access, as well as emergency vehicle movement. These conditions hinder safe access and the efficient flow of traffic across the wider hospital site.
- 6.3 The proposed works aim to support the safe, effective, and efficient operation of the hospital, minimising disruption to patients and healthcare services. In line with Health Technical Memorandum 07-03, the reconfiguration of the parking layout will improve access and circulation, enhance user safety, and increase the number of formal parking spaces in accordance with local parking standards. The scheme also includes the introduction of a dedicated pedestrian route, designed to improve wayfinding, accessibility, and overall safety for all users.
- 6.4 The development is considered to achieve high design standards and is not expected to result in adverse impacts on neighbouring or residential amenity. Any impacts on existing green infrastructure will be appropriately mitigated in accordance with statutory Biodiversity Net Gain (BNG) requirements and relevant local policies.
- 6.5 Given the site's context and existing use, the proposed development is deemed to be appropriate and compatible with its surroundings. It is considered to be in full compliance with the relevant policies of Wiltshire Council's Development Plan.