Wiltshire Council

Written Statement of the Local Planning Authority – Wiltshire Council

Pursuant to Wiltshire Council's refusal of planning application reference: PL/2025/08613

Appeal reference: 6003438

Land South of 214B Corsham Road, Whitley,
Melksham, Wiltshire,
SN12 8QF

February 2026

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1 INTRODUCTION

1.1 Preamble

1.1.1 At the time of writing, the Council hereby draws the appointed planning Inspector's attention to a separate live appeal which has been recovered by the Secretary of State (refer to letter in Appendix L) to determine, pursuant to a speculative housing development outside any settlement limits in the same Melksham Community Area to which this Whitley appeal also refers. The recovered appeal relates to land at Snarlton Farm, Melksham (APP/Y3940/W/25/3373278), which has had its Public Inquiry completed (pursuant to PL/2024/07097) in terms of the inquiry sessions held by the appointed Inspector.

1.1.2 The Council holds the view that the decision on the Snarlton Farm appeal is likely to be material, insofar as that appeal concerns similar considerations pursuant to the application of National Planning Policy Framework (NPPF) paragraphs 11d and 14, which also apply to this Whitley appeal, and the relevant weight that should be afforded to this, in addition to other benefits and harms, in terms of the planning balance.

1.1.3 The SoS decision on the application of NPPF paragraph 14, with particular regard to the interpretation of "*the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits*", is considered to be a material consideration in light of the area having a recently made Neighbourhood Plan that allocates land for housing to meet the local needs.

1.1.4 The Council therefore requests that the appointed planning Inspector carefully considers the materiality of the recovered appeal as part of the determination of this appeal.

1.2 Background and Site Description

1.2.1 This appeal statement has been prepared by Wiltshire Council ('the Council') to defend the refusal of planning permission (under local planning authority (LPA) reference: PL/2025/08613) for a Permission in Principle (PiP) application for the erection of up to 5 dwellings.

1.2.2 The Council refused the PiP application under delegated powers. Prior to determination, the applicant's appointed agent was advised of the Council's intention to recommend refusal and was informed that they could either await the outcome of two public inquiries affecting land within the same Community Area i.e. at Snarlton Farm and Woodrow Road, Melksham - which were both refused and included reference to the application of NPPF paragraphs 11d and 14 in the context of a recently 'made' neighbourhood plan that allocated land for housing. Alternatively, the appointed agent was advised that the appealed development would proceed to a formal refusal.

1.2.3 The appellant confirmed in writing that they were not prepared to wait for the determination of the aforesaid Public Inquiries, and a refusal was issued shortly thereafter.

1.2.4 A copy of the refusal notice is provided in Appendix A. However, for completeness, the reasons for refusal are provided below:

1. *The development as proposed, would materially conflict with the Council's strategic core policies CP1, CP2 and CP15 of the adopted Wiltshire Core Strategy, by virtue of the site not being allocated for housing and being located outside settlement limits, as well as significantly and demonstrably conflicting with the Joint Melksham Neighbourhood Plan 2 2020-2038, which allocates other land for housing (as made*

on 4 August 2025) and that the benefits of the development would not outweigh the aforesaid Plan conflicts and that the application is hereby refused in full compliance with the National Planning Policy Framework paragraph 14.

2. *The proposal to erect up to 5 dwellings with its associated infrastructure on the identified site would materially erode a green buffer that is important to and distinguishes the villages of Whitley and Shaw. The proposed site, being outside the defined settlement limits of Whitley and Shaw, would adversely affect the character and appearance of the local area through the urbanisation of this green buffer, which is considered important to preserve the individual village identities. The proposal is contrary to Core Policy 51 of the adopted WCS and Policy 19 of the made Joint Melksham Neighbourhood Plan 2 2020-2038, which requires proposals to conserve and respect the separate identity of these village settlements.*

   The applicant has also failed to evidence the site's agricultural land classification (by soil sampling) and as such, the Council cannot verify whether the proposal would result in the loss of 'best and most versatile' agricultural land.

1.2.5 The appeal site relates to an undeveloped parcel of open countryside, accessed off the B3353 road to the west, located to the south of Whitley.

As set out in the Delegated Officers' Report (Appendix B), the appeal site is located outside the defined settlement boundary for Whitley.

1.2.6 The appeal site does not fall within any local or national ecological or landscape designations and is not shown to be in an area at high risk of flooding with reference to the Council's Strategic Flood Risk Assessment (SFRA) map and the Environment Agency's Flood Map for Planning.

1.2.7 The Council's mapping does, however, indicate that the appeal site is located on land shown to be Grade 3. As stated within the Delegated Officers' Report in Appendix B, the Council's mapping system does not differentiate between Grade 3a (which falls within the NPPF definition of 'best and most versatile' agricultural land) and Grade 3b, and in the absence of any evidence submitted by the appellants, the Council could not verify whether this PiP proposal would result in the loss of 'best and most versatile' agricultural land.

1.3 <u>The Proposal</u>

1.3.1 The appealed development seeks to erect up to five detached dwellings, to be served by a new vehicular access from the B3353 Corsham Road.

1.4 <u>Planning Policy</u>

The following policies are of relevance to this appeal:

At a local level, the Wiltshire Core Strategy (WCS) adopted 2015, namely core policies (CP): CP1 - Settlement Strategy; CP2 - Delivery Strategy; CP15 - Spatial Strategy: Melksham Community Area; CP50 - Biodiversity and Geodiversity; CP51 - Landscape; CP57 - Ensuring High-Quality Design and Place Shaping; CP60 - Sustainable Transport; CP61 - Transport and New Development; CP64 - Demand Management

Saved policies of the West Wiltshire District Plan (1st Alteration) adopted June 2004: U1a Foul

Water Disposal

The 'made' Joint Melksham Neighbourhood Plan 2 (JMNP2) 2020-2038, was formally made on 4 August 2025 and allocated housing land to meet local needs.

Wiltshire Council Local Transport Plan 2011-2026 (LTP3) and Local Transport Plan 2025-2038 (LTP4);

Wiltshire Council Housing Land Supply Statement (using base date April 2024) published in June 2025.

Wiltshire Design Guide, adopted April 2024

National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG)

1.5 Planning History

The following planning history is of relevance to this appeal:

16/11951/FUL - Erection of one self-build 3-bed dwelling – This application was presented to members of the Western Area Planning Committee in April 2017 and was refused on the following grounds:

1. *The proposal is outside of the settlement boundary for Whitley and has not been allocated for residential development within the Wiltshire Core Strategy (January 2015), Housing Site Allocations DPD or Neighbourhood Plan. The development fails to meet any of the special circumstances for the creation of additional residential units in such circumstances listed under Paragraph 4.25 of the Wiltshire Core Strategy. The proposal fails to promote a sustainable pattern of development and is contrary to Core Policies 1, 2, 15, 51, 57, 60 & 61 of the Wiltshire Core Strategy.*

2. *The proposed development would constitute as unwarranted encroachment of residential development onto agricultural land which lies outside of any defined development limits in the open countryside and in an established gap between two settlements, without any justification. This would result in the erosion of the separate identity of the countryside and harm the character and appearance of the area in an area where there is a general presumption against development. The proposal is therefore contrary to Core Policies 1 and 51 of the Wiltshire Core Strategy and Paragraph 17 of the National Planning Policy Framework which seek to preserve the intrinsic character of the countryside.*

3. *The proposed development would, by reason of it scale, appearance, siting, plot size, result in an incongruous development that does not respect the existing character and appearance of the area or the existing pattern of development contrary to Core Policy 57. It would also represent an inefficient use of land contrary to Core Policy 57.*

The Council's decision to refuse planning permission was appealed by the applicant (under reference APP/Y3940/W/17/3185863), and the appointed Inspector dismissed the appeal, concluding:

"*that the location of the proposed development would not be suitable, having regard to its position outside of settlement development limits and its effect on the character and appearance of the area.*

Conflict would therefore arise with Core Policies 1, 2 and 15, which all direct development within defined settlement limits. The proposal would also run contrary to Core Policy 51 and 57, which, amongst other things, seek to conserve the separate identity of settlements, and ensure development is complementary to the locality."

Copies of the application form, site plan, the Council's decision notice and the Appeal Decision for 16/11951/FUL can be found in appendices C-F.

2 COUNCILS STATEMENT OF CASE

2.1 Refusal Reason 1 – Appeal Site Outside Settlement Limits

2.1.1 The Delegated Officers' Report in Appendix B sets out why the appealed development is not acceptable in principle and would conflict with CP1, CP2 and CP15 of the adopted WCS and conflict with the recently made Joint Melksham Neighbourhood Plan JMNP (2 edition) (JMNP2) Policy 6 (refer to Appendix I for a complete version of JMNP2).

2.1.2 The Council maintains that the appealed development would entirely fall outside the defined limits of development for the 'Large Village', where new housing is considered to be unacceptable in principle and contrary to the CP1, CP2 and CP15 of the adopted WCS and Policy 6 of the made JMNP2 The application site has not been included as a site allocation in the made JMNP2, and nor does the proposed development fall within any of the exception policies listed in the WCS which permit housing outside the settlement boundary in certain specific circumstances.

2.1.3 Policy CP1 identifies Melksham as a second-tier settlement with the potential for accommodating significant growth. However, CP1 does not allow unfettered development anywhere within the settlement area. The locations for development are managed through other spatial policies, importantly CP2 and CP15.

2.1.4 The supporting text for CP1 of the adopted WCS states at paragraph 4.16 that '*there is a general presumption against development outside the defined limits of development of the Principal Settlements, Market Towns, Local Service Centres and Large Villages*''.

2.1.5 In paragraph 4.17, it is noted that proposals for housing growth (over and above that allowed by the CS) outside the defined limits of development would "*not be supported unless they arise through community-led planning documents, such as neighbourhood plans, which are endorsed by the local community and accord with the provision of this plan''*.

2.1.6 The site has not been identified within the recently made neighbourhood plan as an allocated site for housing as part of JMNP2.

2.1.7 Policy CP2 provides the delivery strategy and establishes a presumption in favour of development within defined settlement limits and specifically provides that development outside settlement boundaries will only be permitted in a limited set of circumstances.

2.1.8 The supporting text for WCS Core Policy 2 at paragraph 4.29 states that CP2:

"*provides a framework for parish and town councils to lead with neighbourhood plans*'' and continues in paragraph 4.33 that "*in order to ensure an appropriate distribution of housing across Wiltshire that supports the most sustainable pattern of growth, indicative requirements are also provided at a Community Area and settlement level within the Core Strategy. These more localised indicative requirements, as set out within the Area Strategy Core Policies, are intended*

to prevent settlements receiving an unbalanced level of growth justified by under or over delivery elsewhere".

2.1.9 Policy CP2 of the adopted WCS clearly sets the framework for parish and town councils to take the lead in planning for growth through neighbourhood plans in their local communities, while also ensuring that new development is distributed appropriately across Wiltshire.

2.1.10 Policy CP15 sets out the spatial strategy for the Melksham Community Area, and explicitly directs decision-makers to CP2 to understand what level and form of growth is appropriate over the plan period. If a proposal fails to satisfy CP2, then it follows that it conflicts with the rationale behind CP15. The fact that the conflict arises through CP15's cross-reference to CP2 is immaterial; the policy is deliberately constructed in that way. The Council submits that the appeal proposal is therefore directly in conflict with CP2 and CP15.

2.1.11 The Council's most recent Housing Land Supply Statement (using a base date of April 2024, published in June 2025) (HLSS) demonstrates that within the Melksham Community Area, the area has seen housing completions exceed the adopted WCS indicative requirement and, after factoring in additional deliverable commitments, a total of 531 dwellings above this requirement is forecast (an additional 22%):

Area	Indicative requirement 2006-2026	Completions 2006-2024	Deliverable commitments 2024-2026[12]	Indicative remaining requirement [13]
Malmesbury	885	1,043	180	-338
Malmesbury CA remainder	510	617	118	-225
Malmesbury CA	1,395	1,660	297	-562
Melksham and Bowerhill	2,240	2,590	103	-453
Melksham CA remainder[16]	130	186	22	-78
Melksham CA[16]	2,370	2,776	125	-531

2.1.12 It is however fully appreciated that the indicative housing figures identified within the adopted WCS were not capped at a maximum number. However, the above evidence does demonstrate that the Melksham Community Area has supported a significant increase in housing delivery since 2006 and beyond what was initially predicted for the area.

2.1.13 JMNP2 Policy 6 is consistent with the adopted WCS, and the NPPF, in that Policy 6 supports proposals for new housing within the existing settlement boundaries and only supports housing outside the settlement boundaries where proposals accord with the WCS and meet "*evidenced local housing need*".

2.1.14 Policy 6 of the JMNP2 is clear that housing outside boundaries "*will be managed in accordance with the adopted Development Plan and should meet evidenced local housing need*". Since the adopted WCS permits housing outside settlement boundaries in only a closed set of circumstances, and the appeal development fails to fall within any of those exceptions, it is also in conflict with Policy 6. It simply cannot be "in accordance" with the Development Plan for Policy 6 if it fails to comply with its core spatial policies.

2.1.15 The JMNP2 allocates a number of sites for residential development to meet (and exceed) the need for new housing in Melksham identified at the time. Those allocations were informed by

a Housing Needs Assessment, which provided updated independent evidence of the specific housing needs within the neighbourhood area. Following an extensive 'call for sites' and Strategic Housing and Economic Land Availability Assessment, 109 possible sites were assessed, and this appeal site was not one of the allocated sites. It is evident that the majority of the JMNP2 allocations are beginning to come forward, despite the plan having only been recently made (in autumn 2025). The JMNP2 is delivering growth within the Melksham Community Area in a plan-led way, which is exactly what the Government seeks.

2.1.16 As above, the JMNP2 includes several new housing allocations, some of which are already beginning to come forward, such as: Land South of Western Way, which was granted outline planning permission under application reference PL/2022/08504 for up to 210 dwellings and a 70-bed care home (JMNP2 Policy 7.3 refers); the approval for the demolition of the Former Melksham library site (JMNP2 Policy 7.2 refers) was granted in July 2024; and approval has been recently granted for the demolition of several buildings on the Cooper Tires site (under application reference PL/2025/07169) pursuant to Policy 7.1 of the JMNP2.

2.1.17 This indicates that the sites allocated within the made JMNP2 are progressing as intended, demonstrating that the plan is effectively facilitating sustainable, plan-led growth across the neighbourhood area.

2.1.18 The core spatial policies of the WCS should not be disregarded solely on the basis that they are out of date. They continue to carry weight in decision-making, and in the case of JMNP2 Policy 6, they carry significant weight. A conflict with even a single policy can, in principle, justify dismissing an appeal, but this depends on the importance of the policies in question and the severity of the conflict.

2.1.19 In this context, the spatial strategy clearly directs housing growth towards defined settlements. Development located outside the settlement boundary is contrary to the Development Plan unless it falls within limited, specified exceptions. It is well established that a proposal cannot be said to comply with the Development Plan as a whole simply because it aligns with certain individual policies, if it fundamentally at offs with the plan's strategy. This appeal proposal is in direct conflict with the key housing policies and the core spatial strategy, and therefore fails to comply with the adopted Development Plan when read as a whole.

2.1.20 As set out in the officer's report in Appendix B, the Council is fully cognisant that it cannot currently demonstrate the requisite 5-year housing land supply, and as such, the 'tilted balance' applies. In light of the recently 'made' JMNP2, both paragraphs 11d and 14 of the NPPF are engaged.

2.1.21 The report included within Appendix B sets out the benefits and harms of this PiP development, pursuant to providing up to 5 new dwellings, which would provide a limited contribution to address the housing shortfall. However, the Council submits that 5 dwellings can only reasonably be afforded limited weight, compared to the more significant weight the 300-house speculative appealed development at Snarlton Farm merits, and this should be duly factored into the determination of this appeal at Whitley when applying NPPF paragraph 14.

2.1.22 Before refusing the application, the Council very carefully considered the benefits of the proposal and concluded that approving this appealed development would give rise to material harm that would significantly and demonstrably outweigh the benefits of the proposal.

2.1.23 The appealed development would be clearly contrary to NPPF paragraph 14, and allowing this speculative development would undermine the neighbourhood planning process and would

demonstrably outweigh its benefits in delivering a community-led approach to shaping local communities. The Council considers that this must be given substantial weight in the planning balance.

2.1.24 As outlined above and set out in Appendix B, this appeal concerns a principle of fundamental importance in the planning system, which relates to the weight and protection that national planning policy affords to neighbourhood planning. Neighbourhood plan protection has remained a consistent feature of the NPPF since 2012, and the Government's intention to retain this protection is clear from the current consultation draft for the emerging version of the proposed revised NPPF.

2.1.25 Paragraph 15 of the current NPPF sets out that the planning system "*should be genuinely plan-led"* which includes "*providing a platform for local people to shape* their surroundings". This is reinforced by NPPF paragraph 30, which emphasises that neighbourhood planning "*gives communities the power to develop a shared vision for their area*", and that neighbourhood plans "*can shape, direct and help deliver sustainable development, by influencing local planning decisions as part of the statutory development plan*".

2.1.26 The Council submits that the JMNP2 sets out what is required by national policy. As set out within the officer's report in Appendix B, the Independent Examiner for the JMNP2 described the neighbourhood plan within Point 3 of the Executive Summary of their report dated May 2025 as being:

"*an excellent example of a neighbourhood plan review. It seeks to bring the Plan up-to-date. It includes a variety of policies and identifies positive and sustainable development. It addresses housing delivery in the Plan period*".

2.1.27 The Independent Examiner also stated in paragraph 8.1 of their report that JMNP2 "*is a first-class example of a local community refreshing its neighbourhood plan*" (refer to Appendix J for a full copy of the Independent Examiner's report of JMNP2).

2.1.28 NPPF paragraph 14 acts as an important safeguard: where a neighbourhood plan is in place, is less than five years old (as applies here), and includes the necessary policies and allocations to meet its identified housing requirement (also the case), the negative impacts of permitting development that conflicts with that plan are "*likely to significantly and demonstrably outweigh the benefits*."

2.1.29 The Council submits that paragraph 14 represents one of the rare circumstances where national policy gives explicit guidance as to the *likely* outcome of the planning balance.

2.1.30 This appeal represents exactly the type of situation that NPPF paragraph 14 is intended to address. Wiltshire Council's administrative area is one of the largest in England, extending across approximately 1,257 square miles and accommodating a population of around 510,400 people. Melksham is already identified in the emerging Local Plan as the Market Town expected to accommodate the greatest proportion of planned housing growth. Paragraph 14 is specifically designed to safeguard communities that proactively plan for their future - those that engage positively with the planning system and keep their neighbourhood plans up to date - ensuring they retain control over where new development is directed, rather than being overridden by wider housing land supply pressures elsewhere in the county.

2.1.31 Based on the above, the Council maintains that the appealed development should be dismissed, as allowing this speculative housing development submitted as a PiP proposal would

be contrary to the plan-led approach for new sustainable development and would fundamentally undermine the neighbourhood plan-making process and the plan-led approach, contrary to the NPPF.

2.1.32 Given that the appeal site has not allocated for housing and lies outside the village's defined development limits, the proposal would result in a significant and demonstrable conflict with the JMNP2, which identifies alternative housing site allocations under Policies 7.1–7.5 of the made plan. Consequently, the limited benefits that would arise from 5 new dwellings would not outweigh these conflicts and harms.

2.1.33 The Council therefore submits that the appeal development should be respectfully dismissed on a point of principle, due to the identified conflict with CP1, CP2 and CP15 of the adopted WCS and Policy 6 of the JMNP2, and paragraph 14 of the NPPF, which safeguards communities that have proactively planned for growth by ensuring they retain control over where development takes place in their local areas.

2.2 Refusal Reason 2 – Loss of a Green Buffer

2.2.1 The appealed development would cause landscape harm through the erosion of the green buffer and the urbanisation of this underdeveloped green gap between settlements. This is set out further within the officer's report in Appendix B.

2.2.2 The Inspector for the appeal pursuant to 16/11951/FUL (reference APP/Y3940/W/17/3185863 – a copy of which is provided in Appendix F) considered in paragraph 5 of their appeal decision that:

"*The appeal site occupies approximately half of a flat, triangular-shaped portion of agricultural land that is characteristically open, laid to rough grass with mature hedgerow boundaries. This land physically and visually separates the individual settlements of Shaw and Whitley. While it is possible to see surrounding development from it, the site's verdant, undeveloped characteristics create a green 'buffer', which ensures the identities of each settlement remains distinct. Moreover, even with a more marked continuation of built form on the other side of Corsham Road, the appeal site help to synthase the transition from the built-up edges of the settlement into the countryside beyond*."

2.2.3 In paragraph 6 of their Appeal Decision, the appointed Inspector stated that the erection of one two-storey dwelling on this site would "*fundamentally diminish its softer, open and verdant characteristics. Although some of the intervening land would be left undeveloped, the proposal would nevertheless interpose domestic built form, resulting in a discernible encroachment into it. Rather than 'round off' the settlement, the development would result in an incremental, harmful extension of the urban edge into the open countryside*" and continues in paragraph 7 that:

"*Contributing to a gradual yet tangible loss of the green 'buffer' that distinguishes Whitley and Shaw, the proposal would also result in a harmful degree of coalescence between the two settlements. Given the site's location just off Corsham Road, the harm would be obvious from the main route, as well as from the adjacent Public Rights of Way*".

2.2.4 The Council maintains that the appeal site still serves as a valuable green buffer, which aids in the separation of the existing settlements. The proposed development of this buffer, which would involve the construction of up to five dwellings, vehicular access, on-site car parking provision, and domestic paraphernalia, would significantly erode this green buffer through its urbanisation and the expansion of the urban edge into open countryside.

2.2.5 In recognition of the PiP submission, there is a lack of identified mitigation and enhancement measures to demonstrate how the appeal development would respect the separation of Whitley and Shaw. As such, the Council maintains that there would be conflict with CP51 of the adopted WCS and Policy 19 of the JMNP2, which seek to conserve and respect the separate identity of these village settlements.

2.2.6 Whilst the appellant has mentioned that the appeal development would have "*new structural landscaping along the southern boundary of the site*" in paragraph 2.28 of their statement, no specific details of this have been provided, and as such, this cannot be relied upon at this stage.

2.2.7 As detailed within the officers report in Appendix B, it is noted that the appeal development does not seek to develop the entire parcel of land within the applicant's ownership (i.e. all the land enclosed within the blue line drawn on the submitted location plan), however the appeal development would result in a material erosion of the important green buffer, that provides a positive function in terms of safeguarding and distinguishing the identities of the Whitley and Shaw as distinct villages contrary to CP51 of the adopted WCS and Policy 19 of the made JMNP2.

3 RESPONSE TO THE APPELLANT'S STATEMENT

3.1 LPA Comments on the Appellant's Statement

3.1.1 In paragraph 2.8 of the Appellants Statement, it is submitted that the

"*Spatial Strategy of the Local Plan clearly indicates that there is a presumption in favour of sustainable development at the 'Large Village' of Whitley and small developments of up to 10 dwellings are appropriate to the scale of the settlement. The appeal site is itself considered to be suitable for development from a Sustainability and Accessibility perspective and this is not disputed by the Council, but the principle of development cannot be supported due to the lack of a plan-led approach*".

3.1.2 The appealed development is not located within the Large Village of Whitley but instead forms part of the spatial gap between Whitley and Shaw, on land outside the settlement boundary. This green buffer is considered important to prevent coalescence of the villages.

3.1.3 The Council does not, however, consider that the appealed development would experience any less access to services or for future residents of the PiP development (if it were to be allowed at Appeal) compared to existing properties within the village. At this location, future occupiers at the appeal site would likely rely on the use of a private vehicle to travel to services, facilities and amenities, but no more so than the existing residents of nearby properties located within the settlement. This is due to the proximity of the appeal site to the existing public highway, bus stops, and to local services and facilities that are within walking distance. Therefore, no substantive conflict had been identified with policies CP60 and CP61 of the adopted WCS.

3.1.4 The Council accepts that the Wiltshire Core Strategy is out of date and as a consequence NPPF paragraph 11 is engaged, as set out in Appendix B. However, the core spatial policies of the adopted WCS should not be dismissed simply because they are out of date. The Council submits that they continue to attract weight in the decision-making process and significant weight in the case of JMNP2 Policy 6.

3.1.5 In response to the comments made about whether the appeal development would provide housing to meet unmet local need, no evidence has been provided by the appellants to corroborate this argument and how the appeal development would address this, apart from providing market housing in the open countryside.

3.1.6 At the time of preparing this Statement, the emerging Wiltshire Local Plan examination has been paused, and therefore it carries limited weight at this time.

3.1.7 With regard to the first reason for refusal, the Council maintains the view that allowing the appeal development would be in conflict with the made neighbourhood plan as a whole, and it would undermine the whole plan-led approach to placemaking by local communities.

3.1.8 The appellant's comments regarding the level of housing allocated through the neighbourhood plan are duly noted. However, the plan was 'made' based on the allocated sites identified in policies 7.1-7.5, and it was clearly the view of the examiner that the inclusion of these specific sites was adequate, and as stated previously, the examining Inspector found the JMNP2 to be "*a first-class example of a local community refreshing its neighbourhood plan*".

3.1.9 In response to paragraph 2.25 of the appellant's appeal submission, it is acknowledged that the red line boundary has not been drawn further south within land owned by the appellant and would not extend further beyond the line of the settlement boundary to the west of the appeal site. However, given that this is a PiP, where limited details are known, the appellant's future aspirations for a detailed layout and landscaping cannot be considered at this stage.

3.1.10 Given that the appeal site relates to an undeveloped parcel of land, which visually assists in maintaining the separation of the individual settlements of Shaw and Whitley, the erosion of the green buffer through the urbanisation of this underdeveloped green gap between settlements would lead to material harm that is not supported by the Council.

3.1.11 The Council maintains that the lack of evidence to confirm the appeal site's agricultural land classification status is a fundamental flaw, whereby the actual grading of the appeal site has not been evidenced and verified. As things stand, the appeal Inspector is being asked to determine a housing development without knowing whether the land affected constitutes as 'best and most versatile' (BMV) agricultural land which, the Council submits, is fatal to the appeal being supported.

3.1.12 Paragraph 187b of the NPPF is clear that planning policies and decisions should contribute to and enhance the natural and local environment through "*recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland*".

3.1.13 The NPPF does not specify or prescribe an amount of BMV that is considered acceptable to be lost through development, but requires planning policies and decisions to recognise 'the intrinsic character and beauty of the countryside', which is pertinent in this case, as the appeal site also contributes towards an important green buffer between villages.

4 CONCLUSION

4.0 For the above reasons in this statement and with reference to the associated appendices, the appointed Inspector is respectfully requested to dismiss the appeal.

APPENDIX A - DECISION NOTICE FOR PL/2025/08613

The Town and Country Planning Act 1990 The Town and Country Planning (Permission in Principle) (Amendment) Order 2017

Refusal of Permission in Principle

Application Reference Number: PL/2025/08613

Decision Date: 10/12/2025

Applicant:	Mr Tom Nicholas 1 Queenfield Farm, Lower Woodrow, Melksham, Wiltshire, SN12 7RA
Particulars of Development:	Permission in Principle for the Erection of up to 5 Dwellings
At:	Land South of 214B Corsham Road, Whitley, Melksham, Wiltshire, SN12 8QF

In pursuance of their powers under the above Act, the Council hereby REFUSE Permission in Principle for the development referred to in the above application and plan submitted by you, for the following reason(s):

Refusal Reason

1 The development as proposed, would materially conflict with the Council's strategic core policies CP1, CP2 and CP15 of the adopted Wiltshire Core Strategy, by virtue of the site not being allocated for housing and being located outside settlement limits, as well as significantly and demonstrably conflicting with the Joint Melksham Neighbourhood Plan 2 2020-2038, which allocates other land for housing (as made on 4 August 2025) and that the benefits of the development would not outweigh the aforesaid Plan conflicts and that the application is hereby refused in full compliance with the National Planning Policy Framework paragraph 14.

Refusal Reason

2 The proposal to erect up to 5 dwellings with its associated infrastructure on the identified site would materially erode a green buffer that is important to and distinguishes the villages of Whitley and Shaw. The proposed site, being outside the defined settlement limits of Whitley and Shaw, would adversely affect the character and appearance of the local area through the urbanisation of this green buffer, which is considered important to preserve the individual village identities. The proposal is contrary to Core Policy 51 of the adopted WCS and Policy 19 of the made Joint Melksham Neighbourhood Plan 2 2020-2038, which

requires proposals to conserve and respect the separate identity of these village settlements.

The applicant has also failed to evidence the site's agricultural land classification (by soil sampling) and as such, the Council cannot verify whether the proposal would result in the loss of 'best and most versatile' agricultural land.

Nic Thomas **- Director of Planning, Economy and Regeneration**

APPENDIX B - COPY OF THE DELEGATED OFFICERS' REPORT FOR PL/2025/08613

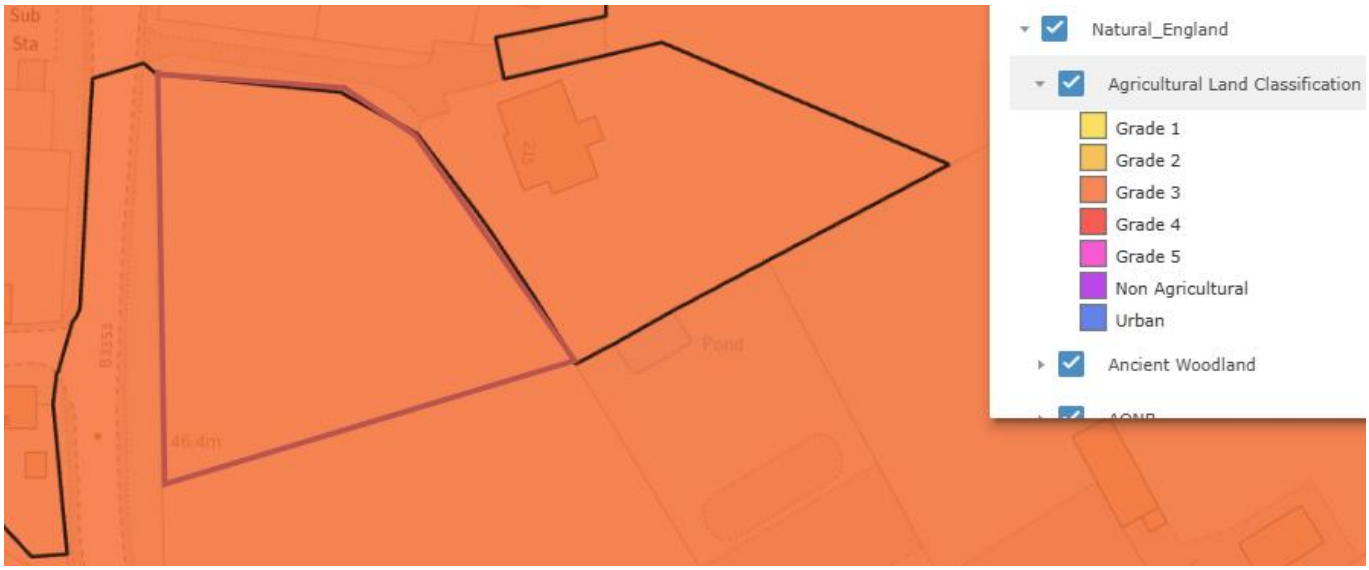
APPLICATION FOR PERMISSION IN PRINCIPLE CASE OFFICER REPORT

APPLICATION REFERENCE:	PL/2025/08613
APPLICATION TYPE:	Permission in Principle
SITE ADDRESS:	Land South of 214B Corsham Road, Whitley, Melksham, Wiltshire, SN12 8QF
DEVELOPMENT DESCRIPTION:	Permission in Principle for the Erection of up to 5 Dwellings
RECOMMENDATION:	**REFUSE**

SITE DESCRIPTION/CONTEXT:
The subject site is located to the south-east of Whitley (a large village with reference to the CP15 of the adopted Wiltshire Core Strategy) and forms a parcel of undeveloped open countryside accessed off the B3353 road.

The application site is located outside the defined settlement boundary for Whitley (as depicted by the solid black line in the extract below from the Council's mapping system), but the site does border the settlement boundary to the north and east. Whitley Golf Club is located to the east of the site and a public right of way (a footpath), reference MELW84 runs across the north of the site.

The application site is not mapped on Defra's Magic Map Application in terms of setting out what the Agricultural Land Classification (ALC) is. The Council's mapping system (which is not based on soil sampling evidence) i9ndicatively shows the site to be Grade 3, as illustrated in the extract below. It is also important to note that the Council's mapping system does not differentiate between Grade 3a (which falls within the definition of 'best and most versatile' agricultural land) and Grade 3b.

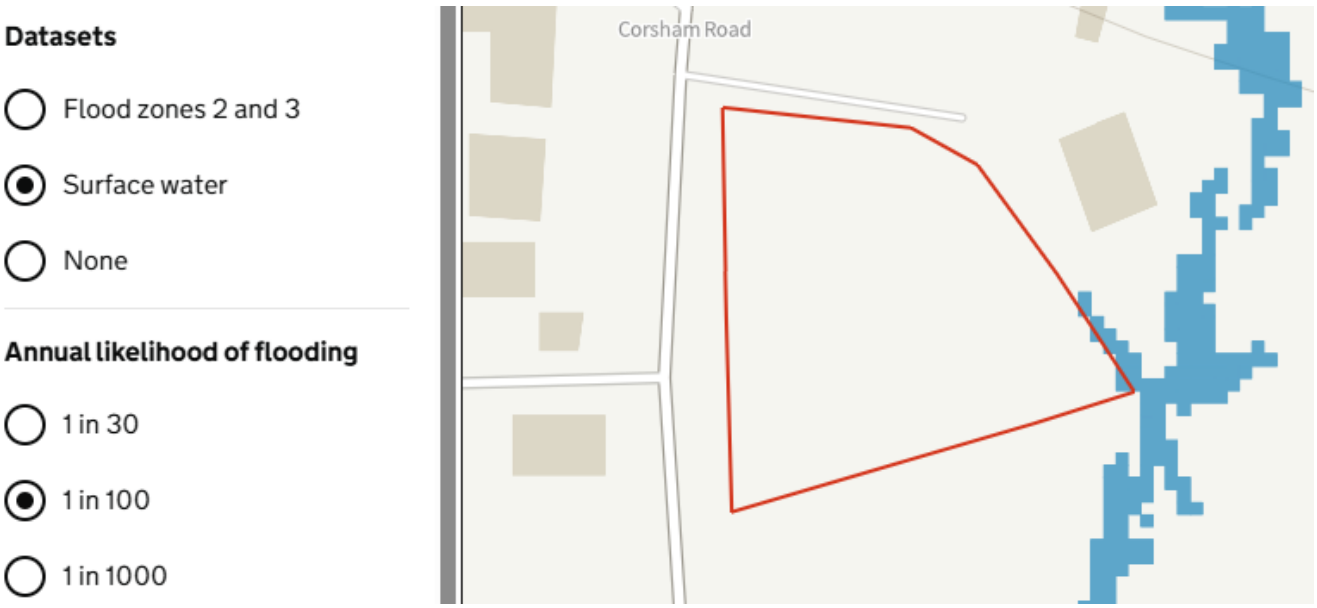


The subject site is located outside the settlement limits of Whitley and forms part of a recognised green buffer that separates and distinguishes the villages of Whitley and Shaw.

Section 2.2 of the applicant's submitted Planning Statement argues that site *"covers an area of circa. 0.3ha of land which is proposed to be developed. The site is not covered by any local or national landscape or ecological designation, or any site specific constraints from a planning perspective. The site is level and can be accessed via the B3353 Corsham Road*".

The Council's mapping system confirms that the subject site does not fall within any local or national ecological or landscape designations.

The application site has been screened on the Council's Strategic Flood Risk Assessment (SFRA) map and the Environment Agency's Flood Map for Planning and is shown to be at low risk of flooding from fluvial or groundwater flooding, with only the southeasternmost corner of the site to be impacted by surface water flooding, as illustrated in the extract below taken from Map – Flood map for planning – GOV.UK:



Based on this mapping, officers submit that the site is not considered to be at high risk of flooding.

PROPOSAL:
This Permission in Principle (PiP) application seeks to erect up to five detached dwellings on the subject site, to be served by a new vehicular access from the B3353 Corsham Road. Section 3.3 of the submitted Planning Statement states that it would be in the intention "*to provide two storey dwellings of a scale and layout that respect the pattern of the established built environment*."

As this appeal relates to a Stage 1 PiP application, the submitted information is limited to a planning statement, a completed application form and location plan.

As set out within Paragraph: 001 Reference ID: 58-001-20180615 of the Planning Practice Guidance (PPG) the "*permission in principle consent route is an alternative way of obtaining planning permission for housing-led development which separates the consideration of matters of principle for proposed development from the technical detail of the development. The permission in principle consent route has 2 stages: the first stage (or permission in principle stage) establishes whether a site is suitable in-principle and the second ('technical details consent') stage is when the detailed development proposals are assessed*".

In addition to the above, Paragraph: 012 Reference ID: 58-012-20180615 of the PPG is clear that the *"scope of permission in principle is limited to* ***location, land use and amount of development****. Issues relevant to these 'in principle' matters should be considered at the permission in principle stage"*, emphasis added by officers.

Therefore, only the principle of the development can be assessed in this instance.

PLANNING HISTORY: The following application is considered to have some material relevance to this PIP application:

16/11951/FUL - Erection of one self-build 3-bed dwelling – This application was presented to members of the Western Area Planning Committee in April 2017 and was refused on the following grounds:

1 *The proposal is outside of the settlement boundary for Whitley and has not been allocated for residential development within the Wiltshire Core Strategy (January 2015), Housing Site Allocations DPD or Neighbourhood Plan. The development fails to meet any of the special circumstances for the creation of additional residential units in such circumstances listed under Paragraph 4.25 of the Wiltshire Core Strategy. The proposal fails to promote a sustainable pattern of development and is contrary to Core Policies 1, 2, 15, 51, 57, 60 & 61 of the Wiltshire Core Strategy.*

2 *The proposed development would constitute as unwarranted encroachment of residential development onto agricultural land which lies outside of any defined development limits in the open countryside and in an established gap between two settlements, without any justification. This would result in the erosion of the separate identity of the countryside and harm the character and appearance of the area in an area where there is a general presumption against development. The proposal is therefore contrary to Core Policies 1 and 51 of the Wiltshire Core Strategy and Paragraph 17 of the National Planning Policy Framework which seek to preserve the intrinsic character of the countryside.*

3 *The proposed development would, by reason of it scale, appearance, siting, plot size, result in an incongruous development that does not respect the existing character and appearance of the area or the existing pattern of development contrary to Core Policy 57. It would also represent an inefficient use of land contrary to Core Policy 57.*

The Council's decision to refuse planning permission was appealed by the applicant (under reference APP/Y3940/W/17/3185863), and the appointed Inspector dismissed the appeal, concluding:

"*that the location of the proposed development would not be suitable, having regard to its position outside of settlement development limits and its effect on the character and appearance of the area. Conflict would therefore arise with Core Policies 1, 2 and 15, which all direct development within defined settlement limits. The proposal would also run contrary to Core Policy 51 and 57, which, amongst other things, seek to conserve the separate identity of settlements, and ensure development is complementary to the locality*."

RELEVANT LEGISLATION, POLICIES AND GUIDANCE

National Context: National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG)

The development plan for Wiltshire comprises the Wiltshire Core Strategy (WCS) (adopted January 2015) and any made neighbourhood plans, which remains the principal statutory planning document guiding development across the county. In line with Section 38(6) of the Planning and Compulsory Purchase Act 2004, planning decisions must be made in accordance with the development plan unless material considerations indicate otherwise.

Though the development plan is considered as a whole, those parts deemed to be particularly relevant to this application are listed below:

Local Context: The Wiltshire Core Strategy (WCS) adopted 2015, namely core policies (CP): CP1 - Settlement Strategy; CP2 - Delivery Strategy; CP15 - Spatial Strategy: Melksham Community Area; CP50 - Biodiversity and Geodiversity; CP51 - Landscape; CP57 - Ensuring High-Quality Design and Place Shaping; CP60 - Sustainable Transport; CP61 - Transport and New Development; CP64 - Demand Management

Saved policies of the West Wiltshire District Plan (1st Alteration) adopted June 2004: U1a Foul Water Disposal

The 'made' Joint Melksham Neighbourhood Plan 2 (JMNP2) 2020-2038, formally made on 4 August 2025

Wiltshire Council Local Transport Plan 2011-2026 (LTP3) and Local Transport Plan 2025-2038 (LTP4);

Wiltshire Council Housing Land Supply Statement (using base date April 2024) published in June 2025.

Wiltshire Design Guide, adopted April 2024

Emerging Wiltshire Local Plan (WLP) Policies: Policy 1: Settlement Strategy; Policy 2: Delivery Strategy; Policy 3: Reserve sites and broad locations for growth; Policy 4: Addressing climate change; Policy 5: Securing infrastructure provision from new development; Policies 6-20: Chippenham Area Strategy; Policies 70 – 75: Transport and development; Policies 76 – 84: Social, housing, community, public open space and wellbeing; Policies 80– 101: Sustainability, ecology, water and landscape, heritage, air quality

The above reflects the strategic policies set out within the emerging WLP, and it should be noted that at the time of determining this PIP, the examination of the emerging WLP has been paused by the local plan examiners.

In accordance with the advice set out in paragraph 49 of the NPPF, the emerging WLP is however capable of carrying some weight in decision-making. It is important to mention that the WLP has reached Reg 24 stage, and the examination hearing sessions are set to be programmed for 2026.

KEY ISSUES: Principle of the development pursuant to location, land use and the amount of proposed development

CONSULTATION RESPONSES

Councillor Phil Alford: Unitary ward Cllr, Phil Alford requested that should officers be minded to recommend the application for approval, due to concerns relating to: the scale of the development; visual impact on the surrounding area; relationship to adjoining properties; design of the proposal; environmental/highway impact; and car parking, it should be reported to the western area planning committee for cllr determination.. Cllr Alford also commented that the application "*sits outside the made Neighbourhood Plan*".

Melksham Without Parish Council: Objects to the application as follows:

- Not an allocated site in the Melksham Joint Neighbourhood Plan 2
- Not the role of the Melksham JMNP2 to fulfil the housing land supply deficit
- The JMNP2 allocates enough housing
- Conflict with CP1, CP2, CP15 and paragraph 14 of the NPPF

- Outside the settlement boundary
- Coalescence of Whitley and Shaw and therefore conflict with Policy 19 of JMNP2
- Surface water flooding concerns

Wiltshire Council Highways Department: Objects "*The site is located outside of the settlement policy boundary. The proposal is therefore, contrary to Core Policies 60 and 61 of the Wiltshire Core Strategy and Section 9, paras 104, 105, 110 & 112 of the National Planning Policy Framework 2021, which aim to reduce the need to travel particularly by private car and encourage the use of sustainable transport alternative in order to promote a sustainable pattern of development. In view of the above, I would not support such development*."

Wiltshire Council Rights of Way: No objections

REPRESENTATIONS:
In accordance with the requirements of the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended), the application was publicised by way of a site notice displayed near the site, which was issued to the applicant.

Below is a summary of the representations received during the consultation period. Only material planning considerations have been taken into account in the assessment of this application. Non-material issues, such as property values or private legal disputes, cannot be considered in the determination process.

Third-party Representations:
A total of 17 representations have been received on the application, with 1 in support and 16 representations raising the following summarised objections:

- Erosion of the green rural gap
- It is not an allocated site in the Melksham Neighbourhood Plan
- Conflict with the made neighbourhood plan
- The neighbourhood plan was made through a democratic referendum, and approving this site would undermine this
- The site is outside the defined limits of development
- Rural gaps are needed to separate the villages and the town and to prevent them from merging
- Donation requested towards the local community
- Access and visibility are poor
- Traffic and parking are already a problem
- Surface water issues
- The majority of the nearby homes are bungalows
- The proposed two-storey buildings would dominate the existing dwellings
- Previous application on this site from 2016 was refused

One letter of support was received that argued the proposal would "*fit in nicely with the village and a good use of the land*".

ASSESSMENT:
Section 38(6) of the Planning and Compulsory Purchase Act 2004 states:

"If regard is to be had to the development plan for the purposes of any determination to be made under the planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise."

In accordance with this statutory requirement, this application has been assessed against the relevant policies of the Development Plan, including the Wiltshire Core Strategy (2015) and, where applicable, any made Neighbourhood Plans. Consideration has also been given to the policies of the National Planning Policy Framework (NPPF) as a material consideration in the assessment.

Principle of the Development:
As set out in paragraph 012 of the PPG, the matters to be considered when determining a 'permission in principle' application are limited to location, land use and the amount of development. This application relates to the construction of up to 5 dwellings on a parcel of agricultural land located outside any defined settlement boundary to the south of Whitley.

In assessing the appealed development against the spatial strategy set out within the adopted WCS, CP1 'Settlement Strategy' and CP2 'Delivery Strategy' of the adopted WCS outline the Council's settlement hierarchy and identify the settlements where sustainable residential development should take place.

Whitley and Shaw are identified in CP15 of the adopted WCS as being a 'Large Village', to which the WCS CP1 defines such settlements having a "*limited range of employment, services and facilities*".

The application site is located outside of the defined limits of development for the village of Whitley and thus is considered to be located in the open countryside.

WCS policy CP2 sets out the delivery strategy, which aims to deliver development in the most sustainable manner through directing new housing growth to the defined settlements, as well as through neighbourhood plans and site allocation plans.

Policy CP2 of the adopted WCS is also clear that, other than in *"circumstances as permitted by other policies within this plan, identified in paragraph 4.25, development will not be permitted outside the limits of development, as defined on the policies map. The limits of development may only be altered through the identification of sites for development through subsequent Site Allocations Development Plan Documents and neighbourhood plans*". This proposal is not considered to satisfy any of the 'exception policies' listed in paragraph 4.25, which comprise:

- Additional employment land (CP34)
- Military establishments (CP37)
- Development related to tourism (CP39 and CP40)
- Rural exception sites (CP44)
- Specialist accommodation provision (CP46 and CP47); and development that
- Supports rural life (CP48)

In addition to the above, Policy 6 of the made JMNP2 'Housing at Defined Settlements' states that "*proposals for sustainable housing accommodated through development and redevelopment opportunities within existing settlement boundaries of the Plan area will be supported*" and continues in point 2 that housing proposals "*outside settlement boundaries will be managed in accordance with the adopted Development Plan and should meet evidenced local housing need*". This application is considered to be in conflict with CP2 and CP15 of the adopted WCS, and Policy 6 of the made JMNP2, as the application site is located outside the defined settlement boundary for the large village, with none of the above-listed

exception policies applying to this proposal, and no evidence of local housing need has been provided to justify the development in this particular location.

This particular site has not been included as an allocated site within the recently made JMNP2 or the emerging WLP, and the limits of development have not been altered to include this site.

The applicants planning statement argues that the "*NP Site Assessment Report by AECOM…states the site is unconstrained with no landscape or biodiversity designations*".

However, the AECOM Joint Melksham Neighbourhood Plan Site Options and Assessment 2023, only graded this site (reference 3246) as 'potentially suitable' not as 'suitable'.

The AECOM report acknowledges that the site could potentially be suitable for residential development, due to it being adjacent to the existing settlement boundary for Whitley, with the site being located close to existing bus stops and local services in Shaw and Whitley, and with the site also being connected to a pedestrian network. However, the report acknowledged that the site contributes to the rural separation of the two villages, stating that development of this site poses a "*risk of coalescence of Shaw and Whitey with some impacts on the local landscape character*" with the southern section of the site contributing "*to the rural separation of the two settlements and should remain relatively open in character.*

At present Whitley does not have a clear southern settlement edge to the east of Corsham Road. Existing mature trees along the site's southern boundary could potentially help soften the settlement edge and support the rural transition of Whitley to the open countryside. Any potential mitigation landscape buffers should consider how they may support the local green infrastructure network. The site falls under the recommended Green Wedge between Whitely and Shaw (Location 1) of the JMNP Green Gap and Green Wedge Assessment 2023".

This particular matter is appraised later in this report.

The AECOM also recognises that the development of this site "*may lead to the loss of the Best and Most Versatile Agricultural Land subject to detailed surveys (Grade 3)*", as identified above, and since the application has not been accompanied by any scientific soil sampling assessment or evidence to confirm and verify what the true ALC of the site is, this is a fundamental failing of the application.

It is important to record that Paragraph 187 of the NPPF states that local planning authorities should contribute to and enhance BMV land. Development on such land is unsupported unless it can be clearly demonstrated that the benefits of a proposal outweigh the loss of productive agricultural land, or evidence is provided that robustly confirms what the true ALC is and concludes that the site is not BMV.

Paragraph 187b of the NPPF requires planning decisions to recognise the "*intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland*" and to protect such land from unnecessary development.

The Council has not been provided with any evidence to verify the ALC of the site, and therefore it cannot be confirmed at this stage whether the proposal would result in the loss of BMV land or not. This is a failing of the application.

The application site was not selected as a preferred housing allocation in the JMNP2 and nor is identified for housing development in the emerging WLP.

Therefore, developing this site for housing would clearly conflicts with the plan-led approach to sustainable development.

In addition to the above, CP60 and CP61 of the WCS seek to promote sustainable development through the reduction on the reliance of private vehicles by encouraging the sustainable and safe movement of people within Wiltshire.

The Council's highways officer has noted in their consultation response that occupiers of the proposed dwellings would have reliance on the use of private vehicles to access necessary employment, services and facilities due to the site being located outside the settlement boundary.

This matter is discussed further in this report; however, the proximity of the application site to existing residential properties and bus stops from which services to Bath city centre, Corsham, Devizes, Melksham and Trowbridge operate is duly noted. On this basis, no conflict with CP60 and CP61 has been found by the Councils planning officers.

To conclude, whilst the application site is adjacent to the existing settlement boundary, the application site itself falls entirely outside the defined limits of development for Whitley, and such development for market housing is considered to be unacceptable in principle and contrary to the CP1, CP2 and CP15 of the adopted WCS and Policy 6 of the made JMNP2 Furthermore, the application site has not been included within a site allocation in the made JMNP2, nor does the proposed development fall within any of the exception policies listed in the WCS which permit housing outside the settlement boundary in certain specific circumstances.

Housing Land Supply Statement:
The NPPF, within the context of a presumption in favour of sustainable development, aims to significantly boost the supply of housing. It requires local planning authorities to identify and regularly update a supply of specific deliverable sites sufficient to provide a housing land supply measured against the housing requirements of the housing market area identified in the WCS (a description normally abbreviated to 5 years supply).

The NPPF makes it clear that where this cannot be demonstrated, relevant policies for the supply of housing (which in this case would include WCS CP2) cannot be considered up to date, and planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits. Case law however has established that it is down to the planning judgement for the decision maker to decide what weight to afford to policies within a plan that is considered not up to date.

This application has been assessed against the Dec 2024 iteration of the NPPF and the most up-to-date PPG (including the Local Housing Need calculation), and Housing Delivery Test results.

The Council published its current Housing Land Supply Statement in the summer of 2025 with a April 2024 base date): http://www.wiltshire.gov.uk/planning-policy-monitoring-evidence. This Statement forms the basis for the Council's housing land supply position for decision-taking purposes. Notably:

- This was the Council's first Housing Land Supply Statement released since the December 2024 changes to the NPPF. These changes required councils to now demonstrate a five-year housing land supply in all circumstances, have reintroduced the need to include a buffer on the housing requirement, and introduced a revised method for calculating the Local Housing Need.

- The housing land supply position for Wiltshire is **2.42 years**. This is below the five-year housing land supply required by the NPPF. This indicates that the presumption in favour of sustainable development ("tilted balance") applies in decision-taking of planning applications and appeals.

- The latest Housing Delivery Test results (which measure housing delivery over the past three years) shows that the Council has performed well in the level of housing delivery in Wiltshire. The latest results indicate that the Council have achieved **135%** of its housing requirement in the past three-year period – this requires that only a 5% buffer should be added to the housing requirement in the calculation.

- The housing land supply position used in the operation of NPPF paragraph 78 is calculated at a unitary authority level. However, the Statement also includes details of housing delivery and supply assessed against the indicative housing requirements set out in the adopted WCS provide more localised evidence of delivery and supply which can also be used in the decision-taking exercise.

- The housing land supply is made up of qualifying permissions and resolutions to grant, and allocations from saved district Local Plans, Wiltshire Core Strategy, Chippenham Site Allocations Plan, Wiltshire Housing Site Allocations Plan, and made Neighbourhood Plans.

- The presumption in favour of sustainable development (tilted balance') set out in paragraph 11(d) continues to apply for Wiltshire, where relevant. This paragraph has been amended to adjust the circumstances under which protection policies set out in footnote 7 apply, and when particular regard must be had to certain policies set out in footnote 9.

- The implications of the housing land supply position, and in particular the weight to be attributed to the development plan policies, must be taken into account when determining applications. The extent of the housing land supply shortfall and how it has arisen, the actions being taken to recover the shortfall, and the potential for the proposal to deliver housing in the forthcoming five-year period to help remedy the current shortfall should also be taken into account in the balancing exercise. Following the December 2024 changes, the extent of the housing land supply shortfall has changed significantly, and the council currently has a shortfall in its housing land supply position. This should be taken into account in the balancing exercise.

- The presumption in favour of sustainable development does not mean that all applications for housing should be permitted. However, it does mean that the most important policies (which are likely to include CP2 of the WCS in relation to settlement boundaries and housing requirements, and the relevant Community Area Strategy policy in Core Policies 4 - 33) should not have full weight applied to them in the decision-making exercise. The weight to be attributed to such policies is however a matter of judgement for the decision maker.

- Applications where the adverse impacts would significantly and demonstrably outweigh the benefits can, and should, still be refused. The shortage of a sufficient housing land supply is a material consideration in the decision-taking exercise but this, in itself, does not indicate that all housing applications should be granted permission.

- The annualised housing supply requirement for Wiltshire changed following the December 2024 Government revisions as set out below:

Number of homes per annum under previous Local Housing Need calculation[2].	Number of homes per annum under revised Local Housing Need calculation.	Percentage change
1,917	3,525	+84%

As set out in paragraph 11d) of the NPPF, planning permission should be granted for new housing unless i) the application of policies in the Framework that protect areas or assets of particular importance detailed in Footnote 7 provides a strong reason for refusing the development proposed or ii) any adverse impacts of doing so would "*significantly and demonstrably outweigh the benefits*".

In applying the tilted balance, regard must also be given to paragraph 14, in light of the recently made JMNP2. Paragraph 13 of the NPPF is clear that the "*application of the presumption has implications for the way communities engage in neighbourhood planning*", with neighbourhood plans supporting the delivery of strategic policies contained in local plans or spatial development strategies to "*shape and direct development that is outside of these strategic policies*".

The NPPF continues in Paragraph 14 by clearly stating that in "*situations where the presumption (at paragraph 11d) applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided the following apply (officer emphasis added)*

a) the neighbourhood plan became part of the development plan five years or less before the date on which the decision is made; and
b) the neighbourhood plan contains policies and allocations to meet its identified housing requirement (see paragraphs 69-70)"

The JMNP2 was formally made in August 2025 and therefore paragraph 14 of the NPPF is engaged and part 14a is satisfied. With regards to paragraph 14b, the Council robustly argue that JMNP2 includes policies and dedicated allocations to satisfy the areas identified housing requirement. As the JMNP2 has been recently made, and was subject to examination, the plan has been based on the latest evidence base.

It is also worthy of noting that the JMNP2 was described by the Independent Examiner in their report dated May 2025 as being

"*an excellent example of a neighbourhood plan review. It seeks to bring the Plan up-to-date. It includes a variety of policies and identifies positive and sustainable development. It addresses housing delivery in the Plan period*".

On the basis of the above, officers robustly argue that paragraph 14b of the NPPF is satisfied.

Paragraph 15 of the NPPF makes it very clear that the "*planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for meeting housing needs and addressing other economic, social and environmental priorities; and a platform for local people to shape their surroundings*".

The JNMP2 sets out to achieve this, and allowing this PIP proposal contrary to the plan-led approach would undermine the neighbourhood plan-making process and the plan-led approach to sustainable development, contrary to the NPPF.

Given that the site is not allocated for housing and lies outside the village's defined development limits, the proposal would result in a significant and demonstrable conflict with the JMNP2, which identifies five alternative housing site allocations under Policies 7.1–7.5 of the made plan. Consequently, the limited benefits that would arise from this proposed scheme would not outweigh these conflicts. The application shall therefore be refused, not only due to the identified conflict with CP1, CP2 and CP15 of the adopted WCS and Policy 6 of the JMNP2, but also in accordance with paragraph 14 of the NPPF, which safeguards communities that have proactively planned for growth by ensuring they retain control over where development takes place.

Impact on the Character and Appearance of the Area and wider Landscape:
Policy CP51 of the WCS states that developments "*should protect, conserve and where possible enhance landscape character and must not have a harmful impact upon landscape character, while any negative impacts must be mitigated as far as possible through sensitive design and landscape measures*" and continues in criterion iii that proposals would need to demonstrate that the landscape character has been conserved and where possible enhanced to preserve the "*separate identity of settlements and the transition between man-made and natural landscapes at the urban fringe*".

The application site is considered to be located on a green buffer, which is located outside the settlement boundary in open countryside, and contributes towards preventing the coalescence of Whitley with Shaw and neighbouring settlements. This green buffer contributes towards the separation of the villages, and the erosion of this would adversely affect the character and appearance of the local area through the development and urbanisation of this green buffer as a result of the proposed development.

Policy 19 of the JNMP2 seeks to protect the rural setting of existing settlements and the "*countryside gaps across the Plan area*", an extract of which is provided below:

Policy 19: Separation of Settlements

1. Development proposals should respect the separation between the following settlements:

- **Whitley and Shaw;**
- **Shaw and Melksham;**
- **Beanacre and Melksham; and**
- **Berryfield and Semington.**

2. Proposals for development between the settlements listed above should:

a. be in conformity with development plan policies;

b. demonstrate that they would deliver economic, community and/or environmental benefits which would outweigh any harm to the role and function of the area between the two settlements (individually or cumulatively) as set out in section 1 of this policy, and as detailed in the Green Gap and Wedge Study (2023);

c. minimise and mitigate their urbanising effects, such as artificial lighting and traffic movements; and

d. where practicable, retain trees and hedgerows and, as appropriate to their scale and nature, incorporate additional screening trees and hedgerows as edge features to minimise the impact of development on the separation of the settlements concerned.

Development proposals which would result in the loss of, or an unacceptable reduction of the contribution which it makes to the separation of the settlements concerned will not be supported.

The Planning Committee Report pursuant to the refused 16/11951/FUL application for 1 dwelling, included the following appraisal:

It is considered that the development of this site would erode the visual gap between the settlements and would have an adverse impact on the character and appearance of the area. Views from the PROW to the north of the site would be significantly altered as it would be bounded to the south by domestic curtilage rather than the open countryside. The applicants have not considered landscape impact in the submitted Planning Statement or Design and Access Statement which considered a fundamental flaw within the submission.

As outlined above, it is considered that the proposed development would represent an unacceptable and incongruous encroachment into the open country side and would result in an unacceptable erosion of the open countryside between the separate settlements of the Whitley and Shaw which would have an adverse impact on the character and appearance of the area contrary to Core Policy 51 and 57 of the Wiltshire Core Strategy.

The appointed appeal Inspector, in their assessment, as detailed in the Appeal Decision (reference APP/Y3940/W/17/3185863), concluded the following which remains relevant today:

5. The appeal site occupies approximately half of a flat, triangular-shaped portion of agricultural land that is characteristically open, laid to rough grass with mature hedgerow boundaries. This land physically and visually separates the individual settlements of Shaw and Whitley. While it is possible to see surrounding development from it, the site's verdant, undeveloped characteristics create a green 'buffer', which ensures the identities of each settlement remains distinct. Moreover, even with a more marked continuation of built form on the other side of Corsham Road, the appeal site help to synthase the transition from the built-up edges of the settlement into the countryside beyond.

6. There is notable variety in building ages, scales and styles locally. I therefore do not consider that neither the two-storey height nor the detailed design of the proposed dwelling would be harmful per se. Nevertheless, the introduction of a detached, three-bedroomed dwelling on the site would fundamentally diminish its softer, open and verdant characteristics. Although some of the intervening land would be left undeveloped, the proposal would nevertheless interpose domestic built form, resulting in a discernible encroachment into it. Rather than 'round off' the settlement, the development would result in an incremental, harmful extension of the urban edge into the open countryside.

7. Contributing to a gradual yet tangible loss of the green 'buffer' that distinguishes Whitley and Shaw, the proposal would also result in a harmful degree of coalescence between the two settlements. Given the site's location just off Corsham Road, the harm would be obvious from the main route, as well as from the adjacent Public Rights of Way.

It is recognised that the site still serves as a valuable green buffer that helps separate settlements. The proposed development of this buffer, involving the construction of up to five dwellings and related access, on-site car parking provision, and domestic paraphernalia, would significantly erode this green buffer through its urbanisation and the expansion of the urban edge into open countryside.

The applicant's submitted planning statement argues that:

Policy 19 'Separation of Settlements' seeks to ensure that new development proposals therefore respect the separation between settlements, including Whitley and Shaw. The southern boundary of the application site has been carefully drawn to ensure the villages does not encroach further south towards Shaw... The layout of the development will respect the separation distance and landscape between both

settlements and provides an opportunity to further strengthen the southern boundary through further landscaping.

Whilst it noted that the proposal does not seek the entire development of the parcel of land within the applicant's ownership, the proposal would result in a material erosion of the important green buffer, that provides a positive function in terms of safeguarding and distinguishing the identities of the Whitley and Shaw as distinct village contrary to CP51 of the adopted WCS and Policy 19 of the made JMNP2.

Highways Matters:
The site is located outside the defined settlement boundary for Whitley and as such, is located in open countryside when assessed against the adopted WCS.

Whitley and nearby Shaw do have some local services and facilities that are accessible and within walking distance of the application site. This includes Shaw's Church of England Primary School, which is a c. 4-minute walk south of the subject site, the Pear Tree Inn, which is located a c. 11-minute walk from the application site and Whitley Stores Community Shop, an approximately 10-minute walk from the site.

As previously mentioned, there are bus stops along Corsham Road (c.1 minute walk from the application site) from which services to other settlements operate, thus connecting the application site to Melksham, Chippenham, Trowbridge, Bath and Devizes, at least during weekdays.

Whilst it is appreciated that the application site is located outside of the settlement boundary, it is not considered that future residents of the site would suffer from any less access to services or be any more likely to rely on the use of a private vehicle to travel to services, facilities and amenities compared to the existing residents of nearby properties located within the settlement.

Furthermore, despite dismissing the appealed 16/11951/FUL application (APP/Y3940/W/17/3185863) the appointed inspector did not identify conflict with CP60 and CP61 of the adopted WCS, quoting in paragraph 10 that

"*There are some policies within the development plan that would not be breached by the proposal; including those that encourage locating development where it would reducing the need to travel by private car*" and officers do not identify such conflict for this PIP proposal.

PLANNING BALANCE AND CONCLUSION:
At the heart of the NPPF there is a presumption in favour of sustainable development requiring local planning authorities to approve development proposals that accord with an up-to-date development plan without delay; and where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, permission should be granted unless (taken from paragraph 11d of the NPPF):

- The application of policies in the NPPF that protect areas or assets of particular importance provides a clear reason for refusing development proposed; or
- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole;

For this application, the Council is limited to assessing appraise the location, land use and amount of development as part of this permission in principle submission.

For the reasons identified above, the proposed development is not considered to be acceptable in principle, due to the site being located outside of a defined settlement boundary, with Melksham having a recently made a joint neighbourhood plan, which identifies several sustainable and suitable sites for housing growth to meet local needs.

With both paragraphs 11d and 14 of the NPPF engaged, officers have carefully considered the benefits of the proposal and have concluded that approving this development would give rise to harm that would significantly and demonstrably outweigh the benefits of the proposal.

The proposal would landscape harm through the erosion of the green buffer and the urbanisation of this underdeveloped green gap between settlements.

The lack of identified mitigation and enhancement measures to demonstrate how the proposal would respect the separation of Whitley and Shaw, conflicts with CP51 of the adopted WCS and Policy 19 of the JMNP2.

The Council duly acknowledges that it cannot, at present, demonstrate a 5-year housing land supply, with the current position being a 2.42 year supply of housing, which demonstrates a significant shortfall. With this in mind, the PIP proposal would provide a moderate level of public benefit through the provision of up to 5 new dwellings. It is also appreciated that there would be some short-term benefits from the construction phase of the development, such as job creation, which carries limited weight.

Turning to the adverse impacts/harms, the proposal fails to comply with the development plan as a whole, given the policy conflict with CP1, CP2 and CP15 of the Wiltshire Core Strategy, and Policy 6 of the Neighbourhood Plan. By reason of the site being located outside the limits of development, the conflict with these policies cannot be afforded full weight by virtue of the housing land supply deficit, but the Plan conflicts nevertheless are significant.

In light of the JMNP2 being recently made, which allocates several sites for housing over its plan period, approving this development contrary to NPPF paragraph 14, would undermine the neighbourhood planning process and would demonstrably outweigh its benefits in delivering a community-led approach to shaping local communities. This must be given substantial weight in the planning balance.

The proposal would result in the erosion of an existing green buffer, which contributes towards the separation of the villages of Whitley and Shaw. The proposed development would adversely impact the character and appearance of the area through the urbanisation of this buffer, contrary to CP51 of the WCS and Policy 19 of the JMNP2, which is afforded significant weight.

The applicant has also failed to evidence the site's agricultural land classification status, and the Council's mapping system illustrates the site to be Grade 3 on the ALC. The Council cannot, therefore, verify at this stage whether the proposal would result in the loss of 'best and most versatile' agricultural land. The proposed development would therefore have the potential to result in the irreversible loss of productive agricultural land. This is a material failing of the application that merits being added to a refusal decision.

RECOMMENDATION: **That Planning Permission be REFUSED.**

1. ***The development as proposed, would materially conflict with the Council's strategic core policies CP1, CP2 and CP15 of the adopted Wiltshire Core Strategy, by virtue of the site not being allocated for housing and being located outside settlement limits, as well as significantly and demonstrably conflicting with the Joint Melksham Neighbourhood Plan 2***

2020-2038, which allocates other land for housing (as made on 4 August 2025) and that the benefits of the development would not outweigh the aforesaid Plan conflicts and that the application is hereby refused in full compliance with the National Planning Policy Framework paragraph 14.

2. ***The proposal to erect up to 5 dwellings with its associated infrastructure on the identified site would materially erode a green buffer that is important to and distinguishes the villages of Whitley and Shaw. The proposed site, being outside the defined settlement limits of Whitley and Shaw, would adversely affect the character and appearance of the local area through the urbanisation of this green buffer, which is considered important to preserve the individual village identities. The proposal is contrary to Core Policy 51 of the adopted WCS and Policy 19 of the made Joint Melksham Neighbourhood Plan 2 2020-2038, which requires proposals to conserve and respect the separate identity of these village settlements.***

   The applicant has also failed to evidence the site's agricultural land classification (by soil sampling) and as such, the Council cannot verify whether the proposal would result in the loss of 'best and most versatile' agricultural land.

APPENDIX C - APPLICATION FORM FOR 16/11951/FUL

Development Management, Economic Development and Planning,
County Hall, Bythesea Road, Trowbridge, BA14 8JN
Tel: 0300 456 0114 Email: developmentmanagement@wiltshire.gov.uk

Wiltshire Council
Where everybody matters

Application for Planning Permission.
Town and Country Planning Act 1990

Publication of applications on planning authority websites.
Please note that the information provided on this application form and in supporting documents may be published on the Authority's website.
If you require any further clarification, please contact the Authority's planning department.

1. Applicant Name, Address and Contact Details

Title:	Mr	First Name:	Tom	Surname:	Nicholas
Company name:					
Street address:	c/o agent				
				Telephone number:	
				Mobile number:	
Town/City:				Fax number:	
Country:				Email address:	
Postcode:					

Are you an agent acting on behalf of the applicant? (•) Yes ( ) No

2. Agent Name, Address and Contact Details

Title:		First Name:	Charlotte	Surname:	Watkins
Company name:	LP Planning Consultants				
Street address:	Unit 5A First Floor				
	Industry Park			Telephone number:	01249461869
	Cricketts Lane			Mobile number:	07577073098
Town/City:	Chippenham			Fax number:	
Country:				Email address:	
Postcode:	SN15 3EQ				cgreene@lpplanning.co.uk

3. Description of the Proposal

Please describe the proposed development including any change of use:

One 3 bedroom dwelling. This will be a self build project.

Has the building, work or change of use already started? ( ) Yes (•) No

4. Site Address Details

Full postal address of the site (including full postcode where available)

House:	
Suffix:	
House name:	Land Between 215 and 78 to 81 Corsham Road
Street address:	Corsham Road
Town/City:	WHITLEY
Postcode:	SN12 8QE

Description of location or a grid reference
(must be completed if postcode is not known):

Easting:	388790
Northing:	166015

Description:

5. Pre-application Advice

Has assistance or prior advice been sought from the local authority about this application? ○ Yes ◉ No

6. Pedestrian and Vehicle Access, Roads and Rights of Way

Is a new or altered vehicle access proposed to or from the public highway? ○ Yes ◉ No

Is a new or altered pedestrian access proposed to or from the public highway? ○ Yes ◉ No

Are there any new public roads to be provided within the site? ○ Yes ◉ No

Are there any new public rights of way to be provided within or adjacent to the site? ○ Yes ◉ No

Do the proposals require any diversions/extinguishments and/or creation of rights of way? ○ Yes ◉ No

7. Waste Storage and Collection

Do the plans incorporate areas to store and aid the collection of waste? ◉ Yes ○ No

If Yes, please provide details:

Waste and recycling bins can be accessed from the kitchen via the cloakroom.

Have arrangements been made for the separate storage and collection of recyclable waste? ◉ Yes ○ No

If Yes, please provide details:

2 bins will be used. Please see Proposed Site Plan 07 Rev C.

8. Authority Employee/Member

With respect to the Authority, I am:

(a) a member of staff
(b) an elected member
(c) related to a member of staff
(d) related to an elected member

Do any of these statements apply to you? ○ Yes ◉ No

9. Materials

Please state what materials (including type, colour and name) are to be used externally (if applicable):

Boundary Treatments - description:
Description of *existing* materials and finishes:

Description of *proposed* materials and finishes:
Hedging

Doors - description:
Description of *existing* materials and finishes:

Description of *proposed* materials and finishes:
Timber

Roof - description:
Description of *existing* materials and finishes:

Description of *proposed* materials and finishes:
Mixture of concrete slate and solar slate roof tiles

Vehicle Access - description:
Description of *existing* materials and finishes:

Description of *proposed* materials and finishes:
Permable self binding/pea gravel driveway of similar aesthetic as existing track

Walls - description:
Description of *existing* materials and finishes:

Description of *proposed* materials and finishes:
Semi-dressed local rubble lime stone

Windows - description:
Description of *existing* materials and finishes:

Description of *proposed* materials and finishes:
Timber

OTHER - description:
Type of other material: Guttering
Description of *existing* materials and finishes:

Description of *proposed* materials and finishes:
Brett Martin cast iron style rain water goods

Are you supplying additional information on submitted plan(s)/drawing(s)/design and access statement? (•) Yes ( ) No

If Yes, please state references for the plan(s)/drawing(s)/design and access statement:
Design and Access Statement
Planning Statement

10. Vehicle Parking

Please provide information on the existing and proposed number of on-site parking spaces:

Type of vehicle	Existing number of spaces	Total proposed (including spaces retained)	Difference in spaces
Cars	0	2	2

11. Foul Sewage

Please state how foul sewage is to be disposed of:

Mains sewer	☑	Package treatment plant	☐	Unknown	☐
Septic tank	☐	Cess pit	☐	Other	☐

Are you proposing to connect to the existing drainage system? ◉ Yes ○ No ○ Unknown

If Yes, please include the details of the existing system on the application drawings and state references for the plan(s)/drawing(s):

Main sewer is in Corsham Road. The plan is to connect to this.

12. Assessment of Flood Risk

Is the site within an area at risk of flooding? (Refer to the Environment Agency's Flood Map showing flood zones 2 and 3 and consult Environment Agency standing advice and your local planning authority requirements for information as necessary.) ○ Yes ◉ No

If Yes, you will need to submit an appropriate flood risk assessment to consider the risk to the proposed site.

Is your proposal within 20 metres of a watercourse (e.g. river, stream or beck)? ○ Yes ◉ No

Will the proposal increase the flood risk elsewhere? ○ Yes ◉ No

How will surface water be disposed of?

☐ Sustainable drainage system	☐ Main sewer	☐ Pond/lake
☑ Soakaway	☐ Existing watercourse	

13. Biodiversity and Geological Conservation

To assist in answering the following questions refer to the guidance notes for further information on when there is a reasonable likelihood that any important biodiversity or geological conservation features may be present or nearby and whether they are likely to be affected by your proposals.

Having referred to the guidance notes, is there a reasonable likelihood of the following being affected adversely or conserved and enhanced within the application site, OR on land adjacent to or near the application site:

a) Protected and priority species

○ Yes, on the development site ○ Yes, on land adjacent to or near the proposed development ◉ No

b) Designated sites, important habitats or other biodiversity features

○ Yes, on the development site ○ Yes, on land adjacent to or near the proposed development ◉ No

c) Features of geological conservation importance

○ Yes, on the development site ○ Yes, on land adjacent to or near the proposed development ◉ No

14. Existing Use

Please describe the current use of the site:

Used as pasture.

Is the site currently vacant? ○ Yes ◉ No

Does the proposal involve any of the following?
If yes, you will need to submit an appropriate contamination assessment with your application.

Land which is known to be contaminated? ○ Yes ◉ No

Land where contamination is suspected for all or part of the site? ○ Yes ◉ No

14. Existing Use

A proposed use that would be particularly vulnerable to the presence of contamination? (•) Yes ( ) No

15. Trees and Hedges

Are there trees or hedges on the proposed development site? (•) Yes ( ) No

And/or: Are there trees or hedges on land adjacent to the proposed development site that could influence the development or might be important as part of the local landscape character? ( ) Yes (•) No

If Yes to either or both of the above, you may need to provide a full Tree Survey, at the discretion of your local planning authority. If a Tree Survey is required, this and the accompanying plan should be submitted alongside your application. Your local planning authority should make clear on its website what the survey should contain, in accordance with the current 'BS5837: Trees in relation to design, demolition and construction - Recommendations'.

16. Trade Effluent

Does the proposal involve the need to dispose of trade effluents or waste? ( ) Yes (•) No

17. Residential Units

Does your proposal include the gain or loss of residential units? ( ) Yes (•) No

Market Housing - Proposed

	Number of bedrooms				
	1	2	3	4+	Unknown
Bedsits/Studios					
Cluster Flats					
Flats/Maisonettes					
Houses					
Live-Work Units					
Sheltered Housing					
Unknown					

Proposed Market Housing Total

Market Housing - Existing

	Number of bedrooms				
	1	2	3	4+	Unknown
Bedsits/Studios					
Cluster Flats					
Flats/Maisonettes					
Houses					
Live-Work Units					
Sheltered Housing					
Unknown					

Existing Market Housing Total

Social Rented Housing - Proposed

	Number of bedrooms				
	1	2	3	4+	Unknown
Bedsits/Studios					
Cluster Flats					
Flats/Maisonettes					
Houses					
Live-Work Units					
Sheltered Housing					
Unknown					

Proposed Social Housing Total

Social Rented Housing - Existing

	Number of bedrooms				
	1	2	3	4+	Unknown
Bedsits/Studios					
Cluster Flats					
Flats/Maisonettes					
Houses					
Live-Work Units					
Sheltered Housing					
Unknown					

Existing Social Housing Total

Intermediate Housing - Proposed

	Number of bedrooms				
	1	2	3	4+	Unknown
Bedsits/Studios					
Cluster Flats					
Flats/Maisonettes					
Houses					
Live-Work Units					

Intermediate Housing - Existing

	Number of bedrooms				
	1	2	3	4+	Unknown
Bedsits/Studios					
Cluster Flats					
Flats/Maisonettes					
Houses					
Live-Work Units					

17. Residential Units

Intermediate Housing - Proposed					
	Number of bedrooms				
	1	2	3	4+	Unknown
Sheltered Housing					
Unknown					

Proposed Intermediate Housing Total

Intermediate Housing - Existing					
	Number of bedrooms				
	1	2	3	4+	Unknown
Sheltered Housing					
Unknown					

Existing Intermediate Housing Total

Key Worker Housing - Proposed					
	Number of bedrooms				
	1	2	3	4+	Unknown
Bedsits/Studios					
Cluster Flats					
Flats/Maisonettes					
Houses					
Live-Work Units					
Sheltered Housing					
Unknown					

Proposed Key Worker Housing Total

Key Worker Housing - Existing					
	Number of bedrooms				
	1	2	3	4+	Unknown
Bedsits/Studios					
Cluster Flats					
Flats/Maisonettes					
Houses					
Live-Work Units					
Sheltered Housing					
Unknown					

Existing Key Worker Housing Total

18. All Types of Development: Non-residential Floorspace

Does your proposal involve the loss, gain or change of use of non-residential floorspace? ○ Yes ◉ No

19. Employment

No Employment details were submitted for this application

20. Hours of Opening

No Hours of Opening details were submitted for this application

21. Site Area

What is the site area? 6,650.00 sq.metres

22. Industrial or Commercial Processes and Machinery

Please describe the activities and processes which would be carried out on the site and the end products including plant, ventilation or air conditioning. Please include the type of machinery which may be installed on site:

Is the proposal for a waste management development? ○ Yes ◉ No

If this is a landfill application you will need to provide further information before your application can be determined. Your waste planning authority should make clear what information it requires on its website.

23. Hazardous Substances

Is any hazardous waste involved in the proposal? ○ Yes ◉ No

23. Hazardous Substances

	Amount held on site	
A. Toxic substances		Tonne(s)
B. Highly reactive/explosive substances		Tonne(s)
C. Flammable substances (unless specifically named in parts A and B)		Tonne(s)

24. Site Visit

Can the site be seen from a public road, public footpath, bridleway or other public land? (•) Yes ( ) No

If the planning authority needs to make an appointment to carry out a site visit, whom should they contact? (Please select only one)

(•) The agent ( ) The applicant ( ) Other person

25. Certificates (Certificate B)

Certificate of Ownership - Certificate B
Town and Country Planning (Development Management Procedure) (England) Order 2015 Certificate under Article 14

I certify/ The applicant certifies that I have/the applicant has given the requisite notice to everyone else (as listed below) who, on the day 21 days before the date of this application, was the owner *(owner is a person with a freehold interest or leasehold interest with at least 7 years left to run)* and/or agricultural tenant *("agricultural tenant" has the meaning given in section 65(8) of the Town and Country Planning Act 1990)* of any part of the land or building to which this application relates.

Owner/Agricultural Tenant	Date notice served
Name: Robert Nicholas Number: Suffix: House name: Westlands Farm Street: Westlands Lane Locality: Town: Whitley Postcode: SN12 7QG	07/12/2016

Title: First name: Caron Surname: Greene

Person role: AGENT Declaration date: 07/12/2016 ☑ Declaration made

26. Declaration

I/we hereby apply for planning permission/consent as described in this form and the accompanying plans/ drawings and additional information. I/we confirm that, to the best of my/our knowledge, any facts stated are true and accurate and any opinions given are the genuine opinions of the person(s) giving them. ☑ Date 07/12/2016

APPENDIX D - SITE PLAN DRAWING FOR 16/11951/FUL

EXISTING TRACK TO BE USED AS ACCESS TO PROPOSED DWELLING FROM CORSHAM ROAD

PERMEABLE SELF BINDING/PEA GRAVEL DRIVEWAY. OF SIMILAR AESTHETIC TO EXISTING TRACK

EXISTING GATE

BIN STORAGE & RECYCLING

No 214b
Ridge 58.85

No 1
Ridge 57.06

El Sub Sta

No 81
Ridge 59.27

No 80

No 79
Ridge 59.32

No 78
Ridge 56.16

No 215
Ridge 58.00

B 3353

PARKING BAY 1

PARKING BAY 2

Water Trough

Gate

Ditch

WP & W Fence 0.9m High

WP & R Fence 1.0m High

O/H Tel Cable

EP

SY

TP

Pond

07 rev D - PROPOSED SITE PLAN _ 1:200 @ A2

Copyright Annelise Nicholas
all rights reserved

22.12.16 revision D - access track marked on and porch added

0 2 4 6 8 10 M

APPENDIX E - WILTSHIRE COUNCIL DECISION NOTICE FOR 16/11951/FUL

Wiltshire Council
Where everybody matters

Town & Country Planning Act 1990

NOTIFICATION OF REFUSAL of Full Planning

Application Reference Number: 16/11951/FUL

Agent LP Planning Consultants Unit 5A First Floor Industry Park Cricketts Lane Chippenham SN15 3EQ	**Applicant** Mr Tom Nicholas c/o agent
Particulars of Development: Erection of 1 self build 3 bedroom dwelling	
At: Land Between 215 and 78-81 Corsham Road, Whitley, SN12 8QE	

In pursuance of their powers under the above Act, the Council hereby REFUSE TO GRANT PERMISSION for the development referred to in the above application and plans submitted by you, for the following reason(s):

1 The proposal is outside of the settlement boundary for Whitley and has not been allocated for residential development within the Wiltshire Core Strategy (January 2015), Housing Site Allocations DPD or Neighbourhood Plan. The development fails to meet any of the special circumstances for the creation of additional residential units in such circumstances listed under Paragraph 4.25 of the Wiltshire Core Strategy. The proposal fails to promote a sustainable pattern of development and is contrary to Core Policies 1, 2, 15, 51, 57, 60 & 61 of the Wiltshire Core Strategy.

2 The proposed development would constitute as unwarranted encroachment of residential development onto agricultural land which lies outside of any defined development limits in the open countryside and in an established gap between two settlements, without any justification. This would result in the erosion of the separate identity of the countryside and harm the character and appearance of the area in an area where there is a general presumption against development. The proposal is therefore contrary to Core Policies 1 and 51 of the Wiltshire Core Strategy and Paragraph 17 of the National Planning Policy Framework which seek to preserve the intrinsic character of the countryside.

3 The proposed development would, by reason of it scale, appearance, siting, plot size, result in an incongruous development that does not respect the existing character and appearance of the area or the existing pattern of development contrary to Core Policy 57. It would also represent an inefficient use of land contrary to Core Policy 57.

In accordance with paragraph 187 of the National Planning Policy Framework (NPPF), this planning application has been processed in a proactive way. However, due to technical objections or the proposal's failure to comply with the development plan and/or the NPPF as a matter of principle, the local planning authority has had no alternative other than to refuse planning permission.

Signed

[redacted]

Director for Economic Development & Planning **Dated: 05 April 2017**

APPENDIX F - APPEAL DECISION PURSUANT TO 16/11951/FUL

The Planning Inspectorate

Appeal Decision

Site visit made on 20 February 2018

by H Porter BA(Hons) PGDip IHBC

an Inspector appointed by the Secretary of State

Decision date: 13 March 2018

Appeal Ref: APP/Y3940/W/17/3185863
Land between 215 and 78 to 81 Corsham Road, Corsham Road, Whitley SN12 8QE

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
- The appeal is made by Mr Tom Nicholas against the decision of Wiltshire Council.
- The application Ref 16/11951/FUL, dated 7 December 2016, was refused by notice dated 5 April 2017.
- The development proposed is one 3 bedroom dwelling. This will be a self-build project.

Decision

1. The appeal is dismissed.

Main Issues

2. The main issue is whether the location of the proposed development would be suitable, having regard to its position outside of settlement development limits and its effect on the character and appearance of the area.

Reasons

3. Core Policy 1 of the Wiltshire Core Strategy, January 2015 (the WCS) sets out a settlement strategy for Wiltshire, seeking to locate development within defined settlement limits with the aim of focusing development in the most suitable locations. Core Policy 2 of the CS establishes that limits of development could be altered through the adoption of a Site Allocations Development Plan Document (SADPD) or a Neighbourhood Plan (NP).

4. The extract from the Wiltshire Housing Site Allocations Development Plan Document shows the appeal site and wider field highlighted as a SHLAA site (3246). However, while at one time there may have been local support for inclusion, it is evident that site 3246 was not progressed to the subsequent Draft Wiltshire Housing Site Allocation Plan, which itself has not yet been adopted. Therefore, there is nothing to indicate that the appeal site and wider environs are within limits of development through either an adopted SADPD. Consequently, the appeal site is situated outside settlement development limits, within the open countryside where development is strictly controlled.

5. The appeal site occupies approximately half of a flat, triangular-shaped portion of agricultural land that is characteristically open, laid to rough grass with mature hedgerow boundaries. This land physically and visually separates the individual settlements of Shaw and Whitley. While it is possible to see

surrounding development from it, the site's verdant, undeveloped characteristics create a green 'buffer', which ensures the identities of each settlement remains distinct. Moreover, even with a more marked continuation of built form on the other side of Corsham Road, the appeal site help to synthase the transition from the built-up edges of the settlement into the countryside beyond.

6. There is notable variety in building ages, scales and styles locally. I therefore do not consider that neither the two-storey height nor the detailed design of the proposed dwelling would be harmful per se. Nevertheless, the introduction of a detached, three-bedroomed dwelling on the site would fundamentally diminish its softer, open and verdant characteristics. Although some of the intervening land would be left undeveloped, the proposal would nevertheless interpose domestic built form, resulting in a discernible encroachment into it. Rather than 'round off' the settlement, the development would result in an incremental, harmful extension of the urban edge into the open countryside.

7. Contributing to a gradual yet tangible loss of the green 'buffer' that distinguishes Whitley and Shaw, the proposal would also result in a harmful degree of coalescence between the two settlements. Given the site's location just off Corsham Road, the harm would be obvious from the main route, as well as from the adjacent Public Rights of Way.

8. I conclude therefore that the location of the proposed development would not be suitable, having regard to its position outside of settlement development limits and its effect on the character and appearance of the area. Conflict would therefore arise with Core Policies 1, 2 and 15, which all direct development within defined settlement limits. The proposal would also run contrary to Core Policy 51 and 57, which, amongst other things, seek to conserve the separate identity of settlements, and ensure development is complementary to the locality.

Planning balance

9. Mindful of recent Inspector's decisions, I have no reason to find against Wiltshire's statement that it is currently able to demonstrate a 5-year supply of housing land. Even noting that this might be a change since the original application was submitted, a single dwelling would make a very minor contribution to the supply of housing even if there was a shortfall. There would, however, be some benefits associated with the proposal bringing forward a self-build project and some other economic benefits associated with construction, materials and feeding into the local economy. However, such beneficial aspects are very limited for one house and carry little weight in the overall planning balance.

10. There are some policies within the development plan that would not be breached by the proposal; including those that encourage locating development where it would reducing the need to travel by private car; seek to avoid harm to neighbours' living conditions; protected species, trees, flood risk or parking or highway safety.

11. On the other hand, the site's location indicates that there would be significant conflict with the settlement strategy policies, which, as part of a plan-making process are intended to direct development to the most appropriate locations and which should not be set aside lightly. Furthermore, there would be conflict

with the purposes of policies that seek to protect the open countryside from development, protect the distinct character of separate settlements, and preserve the character and appearance of areas. These matters weigh heavily against the scheme.

12. Taking all of the above into account, whilst recognising there would be some small social and economic benefits, these clearly do not outweigh the environmental harm that would come about from the site's location beyond settlement limits and within the open countryside. Even if there was still a housing land shortfall, the harms would significantly and demonstrably outweigh the benefits. The environmental harm indicates the proposal would not be sustainable development.

Other matters

13. Planning permission runs with the land rather than the Appellant and the harm arising from it would be permanent, whereas their personal circumstances could change. While recognising the Appellant's desire to live close to his place of work, which has garnered some local support, ultimately this would be a personal advantage. That the land may not be of use to the Appellant for agricultural purposes, including keeping cows, does not justify the harm I have identified.

Conclusion

14. For the reasons given above, I do not find there are material considerations sufficient to outweigh the conflict with the development plan taken as a whole. Therefore, I conclude that the appeal should be dismissed.

H Porter

INSPECTOR

APPENDIX G - EXTRACTS OF CP1 AND CP2 OF THE ADOPTED WCS

economy, appropriate levels of housing and the careful use of natural resources. If a development proposal does not accord with the Core Strategy it is deemed unsustainable and will not be supported.

4.8 The Spatial Strategy recognises the importance of delivering new jobs and infrastructure alongside future housing delivery. This will be achieved by ensuring that strategic sites, which are fundamental to the delivery of the strategic objectives, are brought forward through 'masterplans' which are comprehensive and joined up. The council will also use legal agreements to ensure the appropriate timing of infrastructure to support homes and employment.

Core Policy 1: Settlement strategy

The Settlement Strategy

4.9 The main settlements in Wiltshire have seen their role as employment and service providers undergo gradual change. There is less reliance on traditional business sectors, which has altered the employment base across the county. In addition, easy access to larger settlements outside of Wiltshire, such as Bath and Swindon, together with a willingness to travel further to employment opportunities have led to an increase in net out-commuting. The provision and retention of services and facilities have been affected not only by the proximity to larger centres outside of Wiltshire but also changes in habits through growth in internet use for retail and service provision. Nevertheless, a number of settlements retain buoyant employment, retail and service economies.

4.10 Wiltshire is a predominantly rural area and its rural communities have also seen significant change. Although the high demand for new homes due to Wiltshire's attractive environment has led to development taking place, at the same time there has been a decline in employment opportunities, facilities and services in small towns and villages. Again this has been brought about by the ease of travel to larger centres for employment and other purposes.

4.11 The Settlement Strategy identifies four tiers of settlements, namely:

- Principal Settlements
- Market Towns
- Local Service Centres
- Large and Small Villages.

4.12 Wiltshire's Market Towns and Principal Settlements serve different strategic roles. These strategic roles have been identified though an assessment of their individual characteristics and functional relationships with their surrounding area. The results of this classification are set out in the Settlement Strategy (Core Policy 1) and then Core Policy 2 presents the way these settlements will develop in the future.

4.13 The settlement boundaries of the Principal Settlements, Market Towns, Local Service Centres and Large Villages, as defined by former District Local Plans, will be carried into this strategy and retained. These settlement boundaries will be reviewed as part of the Wiltshire Housing Site Allocations and Chippenham Site Allocations DPDs, as set out in the council's Local Development Scheme, in order to ensure they are up to date and can adequately reflect changes which have happened since they were first established. It will also be the prerogative of the community to review settlement boundaries through a neighbourhood plan.

4.14 The level of development at Local Service Centres will be closely linked to their current and future role of providing for a significant rural hinterland. This will consist of less development than that at the Principal Settlements and Market Towns. Developments at Local Service Centres, in accordance with the Settlement Strategy, should provide for local employment opportunities, improved communities facilities and/or affordable housing provision. This will safeguard the role of these settlements and support the more rural communities of Wiltshire.

4.15 At the settlements identified as villages, a limited level of development will be supported in order to help retain the vitality of these communities. At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. These settlement boundaries will also be reviewed as part of the Housing Sites Allocations DPD as set out in the council's Local Development Scheme, in order to ensure that they remain up to date and properly reflect building that has happened since they were first established. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. Relaxation of the boundaries will only be supported where it has been formally reviewed through a subsequent DPD or a community-led neighbourhood plan, which includes a review of the settlement boundary to identify new developable land to help meet the housing and employment needs of that community. In turn this could bring forward benefits to the local community such as improvements to the economy through the identification of land for employment purposes.

4.16 Any existing settlement boundaries for Small Villages and other small settlements not identified in the settlement strategy will be removed (these are listed in Appendix F), and there is a general presumption against development outside the defined limits of development of the Principal Settlements, Market Towns, Local Service Centres and Large Villages. However, some very modest development may be appropriate at Small Villages, to respond to local needs and to contribute to the vitality of rural communities. Any development at Small Villages will be carefully managed by Core Policy 2 and the other relevant polices of this plan.

4.17 Proposals for improved local employment opportunities, housing growth (over and above that allowed by this Core Strategy) and/or new services and facilities outside the defined limits of development will not be supported unless they arise through community-led planning documents, such as neighbourhood plans, which are endorsed by the local community and accord with the provision of this plan. In such circumstances small villages may be able to become more sustainable and their status may change to that of 'Large Villages' as a result in subsequent reviews of the settlement strategy. The strategy does allow for carefully managed development outside of settlement boundaries in specific cases, such as new employment investment where there is an overriding strategic interest, or for other local circumstances such as providing affordable housing, allowing new tourist accommodation or supporting diversification of the rural economy (a full list of exception polices is set out in paragraph 4.25).

Core Policy 1

Settlement Strategy

The Settlement Strategy identifies the settlements where sustainable development will take place to improve the lives of all those who live and work in Wiltshire.

The area strategies in Chapter 5 list the specific settlements which fall within each category.

Principal Settlements

Wiltshire's Principal Settlements are strategically important centres and the primary focus for development. This will safeguard and enhance their strategic roles as employment and service centres.

They will provide significant levels of jobs and homes, together with supporting community facilities and infrastructure, meeting their economic potential in the most sustainable way to support better self containment.

The Principal Settlements are: Chippenham, Trowbridge and Salisbury.

Market Towns

Outside the Principal Settlements, Market Towns are defined as settlements that have the ability to support sustainable patterns of living in Wiltshire through their current levels of facilities, services and employment opportunities.

Market Towns have the potential for significant development that will increase the jobs and homes in each town in order to help sustain and where necessary enhance their services and facilities and promote better levels of self containment and viable sustainable communities.

The Market Towns are: Amesbury, Bradford on Avon, Calne, Corsham, Devizes, Malmesbury, Marlborough, Melksham, Tidworth and Ludgershall, Warminster, Westbury, and Royal Wootton Bassett.

Local Service Centres

Local Service Centres are defined as smaller towns and larger villages which serve a surrounding rural hinterland and possess a level of facilities and services that, together with improved local employment, provide the best opportunities outside the Market Towns for greater self containment.

Local Service Centres will provide for modest levels of development in order to safeguard their role and to deliver affordable housing.

The Local Service Centres are: Pewsey, Market Lavington, Cricklade, Tisbury, Mere, Downton and Wilton.

Large and Small Villages

Large Villages are defined as settlements with a limited range of employment, services and facilities. Small Villages have a low level of services and facilities, and few employment opportunities.

Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities.

The Large and Small Villages are: see area strategies, Chapter 5.

Core Policy 2: Delivery strategy

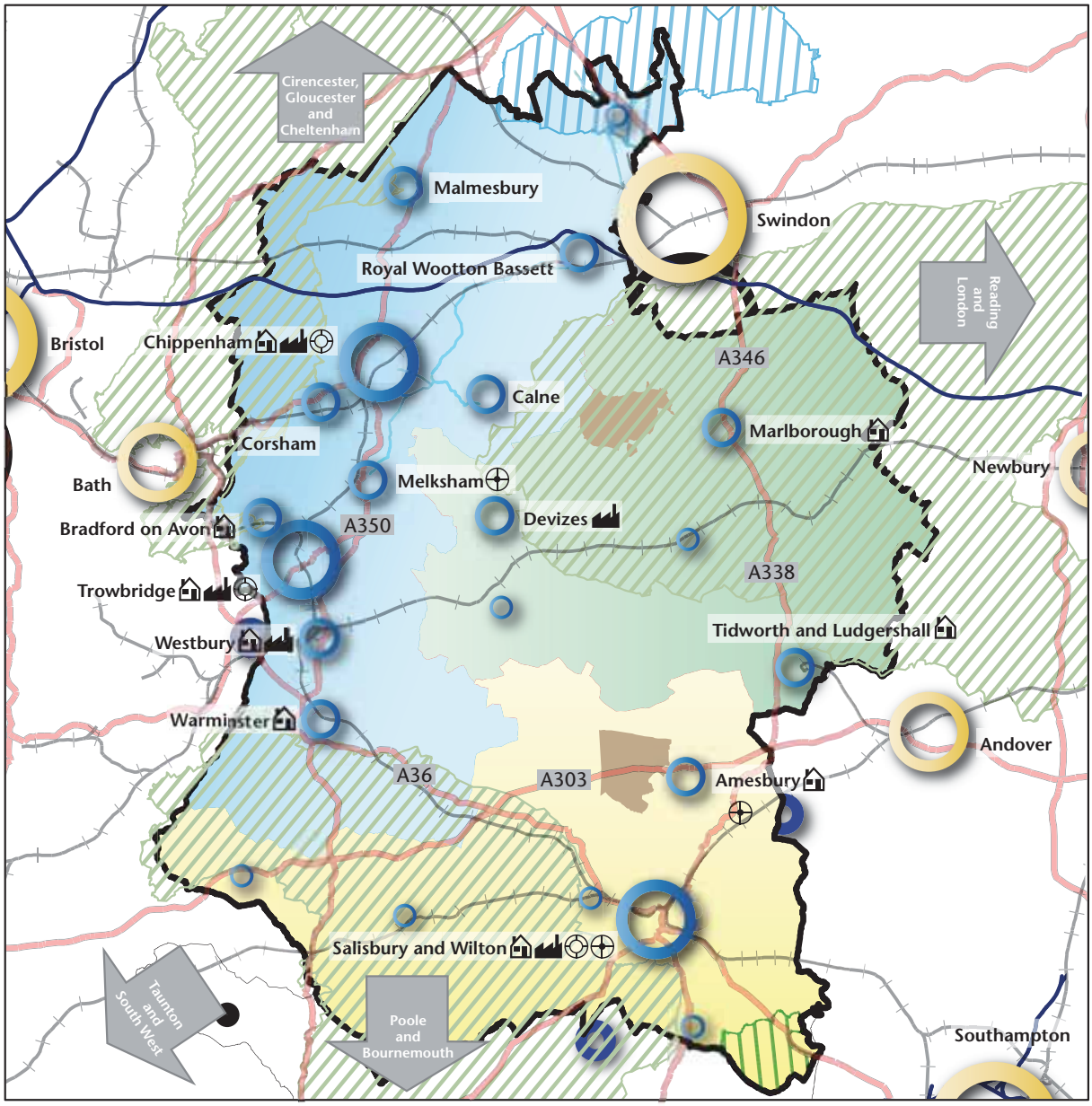
The Delivery Strategy

4.18 The Delivery Strategy recognises that, in some settlements, new jobs have not necessarily been delivered alongside new homes. It therefore seeks to strengthen communities, wherever possible, by allowing appropriate growth to provide for the most sustainable pattern of development within Wiltshire which seeks to reduce the need to travel and help redress the imbalance between jobs and homes.

4.19 The underlying principles of the Delivery Strategy are to ensure that communities have a better balance of jobs, services and facilities and homes. This underlines the focus of the Settlement Strategy to support growth at the Principal Settlements of Chippenham, Trowbridge and Salisbury which provides the greatest opportunities within Wiltshire to deliver improved self containment and potential to generate job growth. The interrelationship between the Settlement Strategy (Core Policy 1) and the Delivery Strategy (Core Policy 2) is explained under paragraphs 4.13 to 4.17.

4.20 Wiltshire's proposed strategic housing requirement is set out against defined sub-county areas as identified within the Wiltshire Strategic Housing Market Assessment (SHMA). However, in order to support the most sustainable pattern of growth, in line with the principles defined in Core Policy 1, indicative requirements are provided for each Principal Settlement, Market Town and by Community Area within paragraph 4.26. The indicative figures also allow a flexible approach which will allow the council, including through the preparation of the Site Allocations DPD, and local communities preparing neighbourhood plans, to respond positively to opportunities without being inhibited by an overly prescriptive, rigid approach which might otherwise prevent sustainable development proposals that can contribute to delivering the strategic objectives of the plan.

Figure 4.1 Wiltshire Key Diagram



Key:

CP2 Housing market areas
- West
- East
- South

CP59 Stonehenge and Avebury World Heritage Site

AONB

CP25 New Forest National Park

CP54 Cotswold Water Park

Motorways

CP53 Wilts and Berks Canal

Strategic transport routes

Strategic rail routes

CP2 Strategic housing or mixed use site

CP2 Strategic employment site

Central area strategies

CP9 Chippenham Central Areas of Opportunity

CP21 Maltings Central Car Park

CP28 Trowbridge Central Areas of Opportunity

CP30 Trowbridge Low-Carbon, Renewable Energy Network

Site specific policies

CP5 Porton Down

CP16 Melksham Link Project

CP23 Old Sarum Airfield

CP1 Local service centres

CP1 Market towns

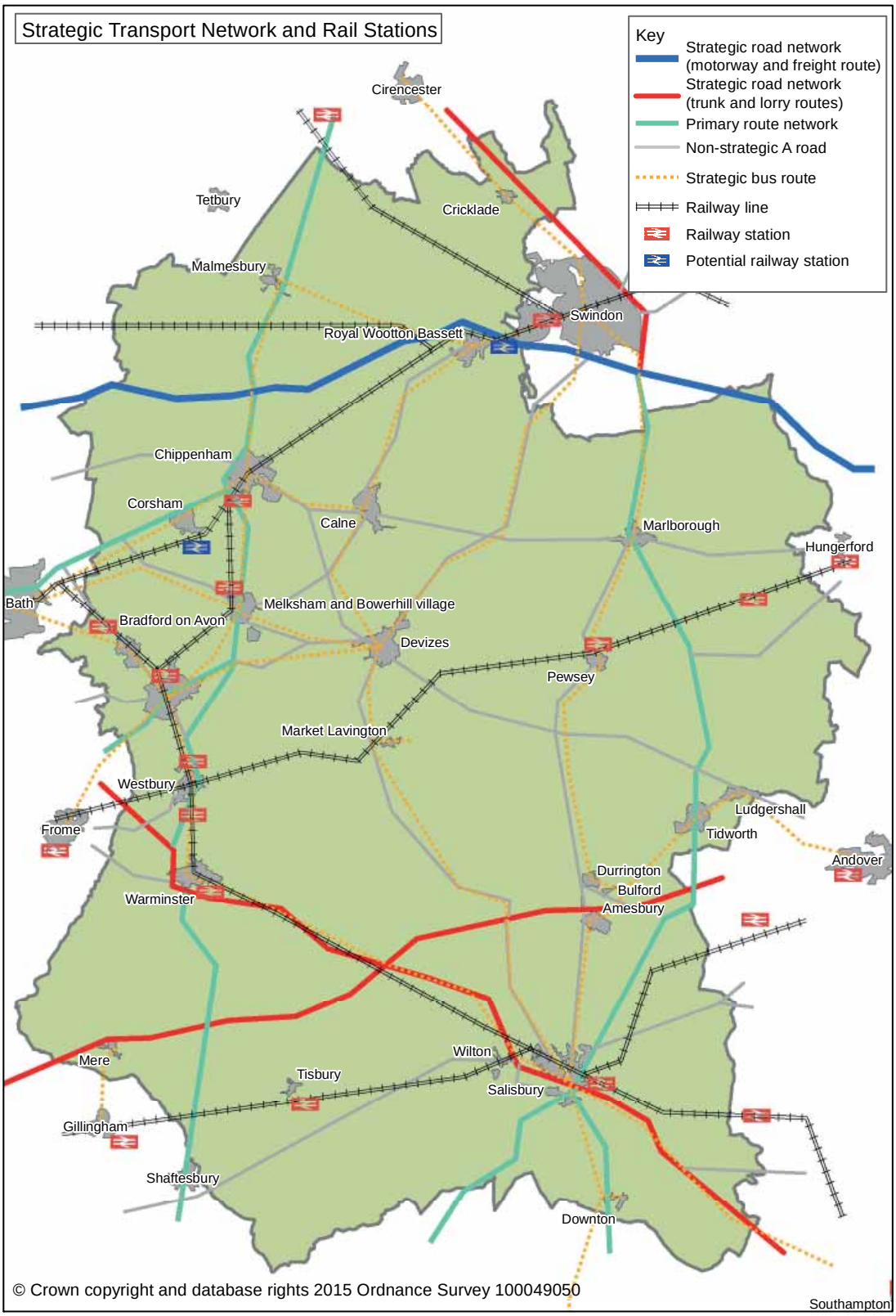
CP1 Principal settlements

Urban centres outside of Wiltshire

Urban centres not shown on map

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Figure 4.1a Wiltshire Key Diagram (Strategic Transport Network)



4.21 The Delivery Strategy identifies around 178ha of new strategic employment land[21] to supplement that already built since 2006 (the base date of the plan) or with planning permission at date of submission, to provide a range of sites and choice of locations across Wiltshire. The new employment land allocated responds to the need to provide for new jobs to provide for investment choice and to assist in meeting job creation targets of the Swindon and Wiltshire Local Enterprise Partnership. The

allocation also allows the retention of existing jobs through facilitating the relocation of existing business to new sites within the locality and thereby allowing older, outdated employment stock to be redeveloped. This builds the necessary flexibility into the strategy.

4.22 The 178ha[22] of new strategic employment land will be provided by a combination of the following types of sites:

- New strategic employment allocations
- Provision of employment land as part of mixed use urban extensions
- Retained Local/District Plan allocations for employment land.

4.23 At mixed use strategic sites there will be a focus on ensuring an appropriate phasing of development, so that jobs are provided in a timely manner alongside new homes. It is therefore a requirement that employment land will be delivered in the early stages of mixed use development proposals. This will be achieved through masterplanning and legal agreements, which will need to accord with the development template identified for each site in Appendix A.

4.24 In planning for new homes, a number of sources have been identified to ensure a continuous supply of housing across the plan period. These sources of supply are detailed within Appendix C and include:

- strategic allocations made within this plan
- retained Local Plan allocations
- existing commitments
- regeneration projects, for example, those in Chippenham, Trowbridge and Salisbury
- business expansion plans[23]
- sites identified through DPDs and neighbourhood plans
- windfall sites in accordance with the delivery strategy.

4.25 The Core Strategy also includes 'exception policies' which seek to respond to local circumstance and national policy. In doing so these represent additional sources of supply to those detailed at paragraphs 4.22 and 4.24. These policies are listed overleaf:

- Additional employment land (Core Policy 34)

- Military establishments (Core Policy 37)
- Development related to tourism (Core Policies 39 and 40)
- Rural exception sites (Core Policy 44)
- Specialist accommodation provision (Core Policies 46 and 47)
- Supporting rural life (Core Policy 48)

4.26 In order to direct development at a strategic level to the most suitable, sustainable locations and at appropriate times, the area strategies contain an indicative housing requirement for each Community Area including the Principal Settlements and Market Towns and, in the South Wiltshire HMA, the Local Service Centres. This is shown in Table 1 below:

Table 1: Indicative Housing Requirements - Settlements and Community Areas

Area	Indicative requirement
Devizes town	2,010
Devizes remainder	490
Marlborough town	680
Marlborough remainder	240
Pewsey	600
Tidworth & Ludgershall	1,750
Tidworth remainder	170
East Wiltshire	5,940
Amesbury, Bulford & Durrington	2,440
Amesbury remainder	345
Mere town	235
Mere remainder	50
Salisbury City/Wilton town	6,060
Wilton remainder	255
Downton town	190
Southern Wiltshire remainder	425
Tisbury town	200

Tisbury remainder	220
South Wiltshire HMA	10,420
Bradford on Avon town	595
Bradford on Avon remainder	185
Calne town	1,440
Calne remainder	165
Chippenham town	4,510[24]
Chippenham remainder	580
Corsham town	1,220
Corsham remainder	175
Malmesbury town	885
Malmesbury remainder	510
Melksham town	2,240
Melksham remainder	130
Royal Wootton Bassett town	1,070
Royal Wootton Bassett & Cricklade remainder	385
Trowbridge town	6,810
Trowbridge remainder	165
Warminster town	1,920
Warminster remainder	140
Westbury town	1,500
Westbury remainder	115
North and West Wiltshire HMA	24,740
West of Swindon	900
Wiltshire	42,000

4.27 The Core Strategy allocates sites and broad locations for growth that are strategically important for the delivery of the Plan for Wiltshire. Additional sites will also be identified through the Chippenham and Housing Site Allocations DPDs to ensure the delivery of housing land across the plan period in order to maintain a five year land supply at each HMA.



4.28 No allocations have been identified for Chippenham in Core Policy 2 and the scale of housing for the town is expressed as a minimum, which is an exception to the approach of indicative housing requirements and identification of sites for the other Principal Settlements. A pattern of development that can best realise the town's economic potential will be identified through a separate Development Plan Document for Chippenham town (The Chippenham Sites Allocation DPD), which will support the area strategy. It will focus on identifying land for mixed use development adjoining the built up area. Limited land opportunities within the urban area inhibit future development and this will need to be addressed urgently. Growth of the town needs to be underpinned by investment in new infrastructure and a more detailed framework will be prepared through the Chippenham Site Allocations DPD that co-ordinates growth and key infrastructure necessary to deliver the town a more resilient long term future.

4.29 Area strategies identify specific issues that must be considered when planning for these areas and these should be taken into account when assessments are carried out to identify specific sites for development in particular towns. Core Policy 2 provides a framework for parish and town councils to lead with neighbourhood plans. The council is also preparing a Housing Sites Allocation DPD in order to ensure a sufficient choice and supply of suitable sites over the period up to 2026.

4.30 The disaggregation to Community Areas set out above is not intended to be so prescriptive as to be inflexible and potentially ineffective in delivering the identified level of housing for each market area. It clarifies the council's intentions in the knowledge of likely constraints in terms of market realism, infrastructure and environmental capacity. They provide a strategic context for the preparation of the Housing Sites Allocation DPD and in order to plan for appropriate infrastructure provision.

4.31 Indicative housing land supply, based around trajectories for each of the HMAs, provides some detail on where the Housing Sites Allocation DPD should focus and by when it needs to have sites identified in order to sustain proposed rates and scales of housing development. This will make up the shortfall in delivery identified towards the end of the plan period. These trajectories provide an evidence basis for an implementation strategy for a full range of housing describing how the council will maintain delivery of a five-year supply of housing land.

4.32 The sources of supply have been assessed to ensure that there is a deliverable supply of housing, with additional contingency to comply with the National Planning Policy Framework (NPPF), relative to the targets for defined areas which are based on the housing market areas (HMAs). This is detailed in Appendix C – Housing Land Supply.

4.33 These housing market areas (HMAs) form the appropriate scale for disaggregation across Wiltshire, as they define areas within which the majority of household moves take place. It is against these HMA requirements that housing land supply will be assessed. This is in accordance with the methodology identified in the NPPF. However, in order to ensure an appropriate distribution of housing across Wiltshire that supports the most sustainable pattern of growth, indicative requirements are also provided at a Community Area and settlement level within the Core Strategy. These more localised indicative requirements, as set out within the Area Strategy Core Policies, are intended to prevent settlements receiving an unbalanced level of growth justified by under or over delivery elsewhere. They also address the ability

of each Community Area to accommodate housing because of the constraints and opportunities present in each. The indicative figures also allow a flexible approach which will allow the council, including through the preparation of the Sites Allocation DPD and local communities preparing neighbourhood plans, to respond positively to opportunities without being inhibited by an overly prescriptive, rigid approach which might otherwise prevent sustainable development proposals that can contribute to maintaining a deliverable five year housing land supply and delivering the strategic objectives of the plan. Neighbourhood Plans should not be constrained by the specific housing requirements within the Core Strategy and additional growth may be appropriate and consistent with the Settlement Strategy (Core Policies 1 and 2). In addition sustainable development within the limits of development or at Small Villages should not be constrained just because requirements have been reached. For these reasons the overall housing requirement is shown as "at least," while the area strategy figures are "indicative."

4.34 Despite the Housing Market Areas being the appropriate scale for assessing land supply, the town and Community Area requirements should also be capable of being a material consideration to ensure that delivery is distributed broadly in line with the strategy. So for example, whilst it is appropriate for supply in Trowbridge to provide for some of the requirement of Westbury, it would be wholly inappropriate for the entirety of Westbury's requirement to be added to Trowbridge. The policy framework sets out the strategic pattern of growth, while allowing some flexibility to respond to future, spatially distinctive opportunities and constraints. Indeed, across the plan period, delivery should be in general conformity with the delivery strategy. Similarly, development that provides housing for the population of Swindon rather than that of Wiltshire should not be assessed against the housing requirements for the Wiltshire Housing Market Areas. Should any development beyond that already committed come forward in this location, this will be additional to the housing requirement for Wiltshire. A specific acknowledgement has been made for the existing commitment at Moredon Bridge and Ridgeway Farm[25] to the west of Swindon for 900 homes. Development in this area does not meet the requirement for the defined housing market areas. These 900 dwellings are an allowance rather than a requirement. As part of the planned early review of the Core Strategy, the council will clarify that its housing requirement will be met without relying upon the delivery of homes to the west of Swindon. The delivery strategy defines the level of growth appropriate within the built up area of small villages as infill. For the purposes of Core Policy 2, infill is defined as the filling of a small gap within the village that is only large enough for not

more than a few dwellings, generally only one dwelling. Exceptions to this approach will only be considered through the neighbourhood plan process or DPDs.

Core Policy 2

Delivery Strategy

In line with Core Policy 1, the delivery strategy seeks to deliver development in Wiltshire between 2006 and 2026 in the most sustainable manner by making provision for at least 178ha of new employment land and at least 42,000 homes distributed as follows:

	Minimum housing requirement (dwellings)
East Wiltshire HMA	5,940
North and West Wiltshire HMA	24,740
South Wiltshire HMA	10,420
West of Swindon[26]	900
Wiltshire	42,000

This will be delivered in a sustainable pattern in a way that prioritises the release of employment land and the re-use of previously developed land to deliver regeneration opportunities, and to limit the need for development on Greenfield sites, with approximately 35% of development taking place on previously developed land.

The 42,000 homes will be developed in sustainable locations in conformity with the distribution set out above, against which the land supply situation will be assessed. A more detailed distribution is set out in the Community Area Strategies. Development proposals should also be in general conformity with these.

Sites for development in line with the Area Strategies will be identified through subsequent Site Allocations DPDs and by supporting communities to identify sites through neighbourhood planning.

Within the defined limits of development

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.

Outside the defined limits of development

Other than in circumstances as permitted by other policies within this plan, identified in paragraph 4.25, development will not be permitted outside the limits of development, as defined on the policies map. The limits of development may only be altered through the identification of sites for development through subsequent Site Allocations Development Plan Documents and neighbourhood plans.

At the Small Villages development will be limited to infill within the existing built area. Proposals for development at the Small Villages will be supported where they seek to meet housing needs of settlements or provide employment, services and facilities provided that the development:

i) Respects the existing character and form of the settlement

ii) Does not elongate the village or impose development in sensitive landscape areas

iii) Does not consolidate an existing sporadic loose knit areas of development related to the settlement.

Strategically important sites

Development will be supported at the following sites in accordance with the Area Strategies and requirements in the development templates at Appendix A.

Central Car Park, Salisbury

Up to 40,000 sqm retail and leisure floor space and 200 dwellings

Churchfields & Engine Sheds, Salisbury

5 ha of retained employment land and 1,100 dwellings

Drummond Park, Ludgershall

475 dwellings

Former Imerys Quarry, Salisbury

4 ha of employment land

Fugglestone Red, Salisbury

8 ha of employment land and 1,250 dwellings

Hampton Park, Salisbury

500 dwellings

Horton Road, Devizes

8.4 ha of employment land

Kings Gate, Amesbury

1,300 dwellings

Kingston Farm and Moulton Estate, Bradford on Avon

2-3 ha of employment land and 150 dwellings

Longhedge (Old Sarum), Salisbury

8 ha of employment land and 450 dwellings

Mill Lane, Hawkeridge, Westbury

14.7 ha of employment land

Salisbury Road, Marlborough

220 dwellings

Ashton Park, South East Trowbridge

15 ha of employment land and 2,600 dwellings

Station Road, Westbury

250 dwellings

UKLF, Wilton

3 ha of employment land and 450 dwellings

West of Warminster

6 ha of employment land and 900 dwellings

Masterplans will be developed for each strategically important site in partnership between the local community, local planning authority and the developer, to be approved by the council as part of the planning application process. At mixed use sites development will be phased to ensure employment land, and its appropriate infrastructure, is brought forward during the early stages of development.

APPENDIX H - EXTRACT OF CP15 FROM THE ADOPTED WCS

Table 5.8 Delivery of Housing 2006 to 2026 - Marlborough Community Area

	Requirement 2006-26	Housing already provided for		Housing to be identified	
		Completions 2006-14	Specific permitted sites	Strategic sites	Remainder to be identified
Marlborough Town	680	344	33	220	83
Remainder	240	112	37	0	91
Community Area total	920	456	70	220	174



Melksham Area Strategy

Spatial information and context

5.80 The Melksham Community Area is located in western Wiltshire and contains the market town of Melksham, one of the larger towns in the county. Melksham benefits from strong links by road with the larger centres of Trowbridge and Chippenham and the regionally significant A350 runs through the town from north to south. There are a large number of historic buildings within Melksham, but 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. Large numbers of residents travel to work in the nearby larger centres of Trowbridge, Chippenham and Bath, as well as smaller centres such as Calne, Corsham and Devizes.

5.81 Melksham is identified as having an important strategic employment role. It is located on the A350 and forms part of the key A350 employment growth area. The town has a reasonably broad economic base and has historically been able to attract large employers. However, a large number of jobs are provided by a single employer, which may leave the town vulnerable to mass job losses. Nevertheless, there are good opportunities to expand the employment base within Melksham.

The strategy for the Melksham Area

5.82 A high level of residential development is already proposed in Melksham, including a planned urban extension to the east of the town on land identified in the West Wiltshire District Plan (2004). This planned development will go some way towards addressing the future affordable housing need in the town. 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.

Issues and considerations

5.83 Specific issues to be addressed in planning for the Melksham Community Area include:

- 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. The preparation of a 'town plan' or similar document (e.g. neighbourhood plan) may provide a useful step to help achieve the aspirations of the local community. Wherever possible, key community services and facilities should be located within or well related to the town centre to help promote and deliver the requisite regeneration. This should include consideration for how to best provide for the proposed new community campus for the town, which would offer a number of services and facilities, including leisure uses
- there is limited scope for any further convenience retail provision in the town. However, there is some potential for expansion of comparison retailing, which

should be focused in the central area of the town to support town centre regeneration. Any proposals for large format retail units should demonstrate how they would be integrated with and enhance the 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
- it is importance any new development in the town has strong walking and cycling linkages to the town centre. There is local concern around the current opportunities to access the Melksham Oak School and new Asda store
- new primary and secondary school capacity is needed for the area and this will need to be met through extension and rationalisation of the existing schools or through additional schools
- developer contributions from future housing growth should help to deliver infrastructure necessary in the town. In particular, there is a need to increase the capacity of GP surgeries, particularly towards the west of the town. Additional cemetery capacity is also needed
- the proposed restoration of the Wilts and Berks Canal provides an opportunity to promote tourism within the town and provide linkages with the nearby Kennet and Avon Canal, an important leisure corridor. Opportunities to maximise the benefit of the canal restoration will be supported, as discussed below. This matter could be addressed through future town or neighbourhood planning work
- all development should address the need for improvements to water supply and sewerage infrastructure
- opportunities to enhance the riverside area in Melksham as an important leisure corridor could be integrated into plans for the canal and any regeneration proposals. However, any proposals will need to be carefully considered through a community-led process, such as a neighbourhood plan
- a need to improve public transport provision in the area has been identified, including improving bus services; improving the railway station; promoting more frequent services; car parking at the station and access for buses; and establishing a safe cycle route network for Melksham

- Melksham and Bowerhill village have a functional relationship and are considered together for the purposes of this strategy. Therefore the housing growth identified for Melksham town will also serve to meet the needs of Bowerhill. The identity of these separate communities will need to be preserved through the planning process. Berryfield is considered separately and is identified as a small village. However, it is recognised that both Berryfield and Bowerhill have strong functional links to Melksham and have important individual characteristics which should be protected where practicable

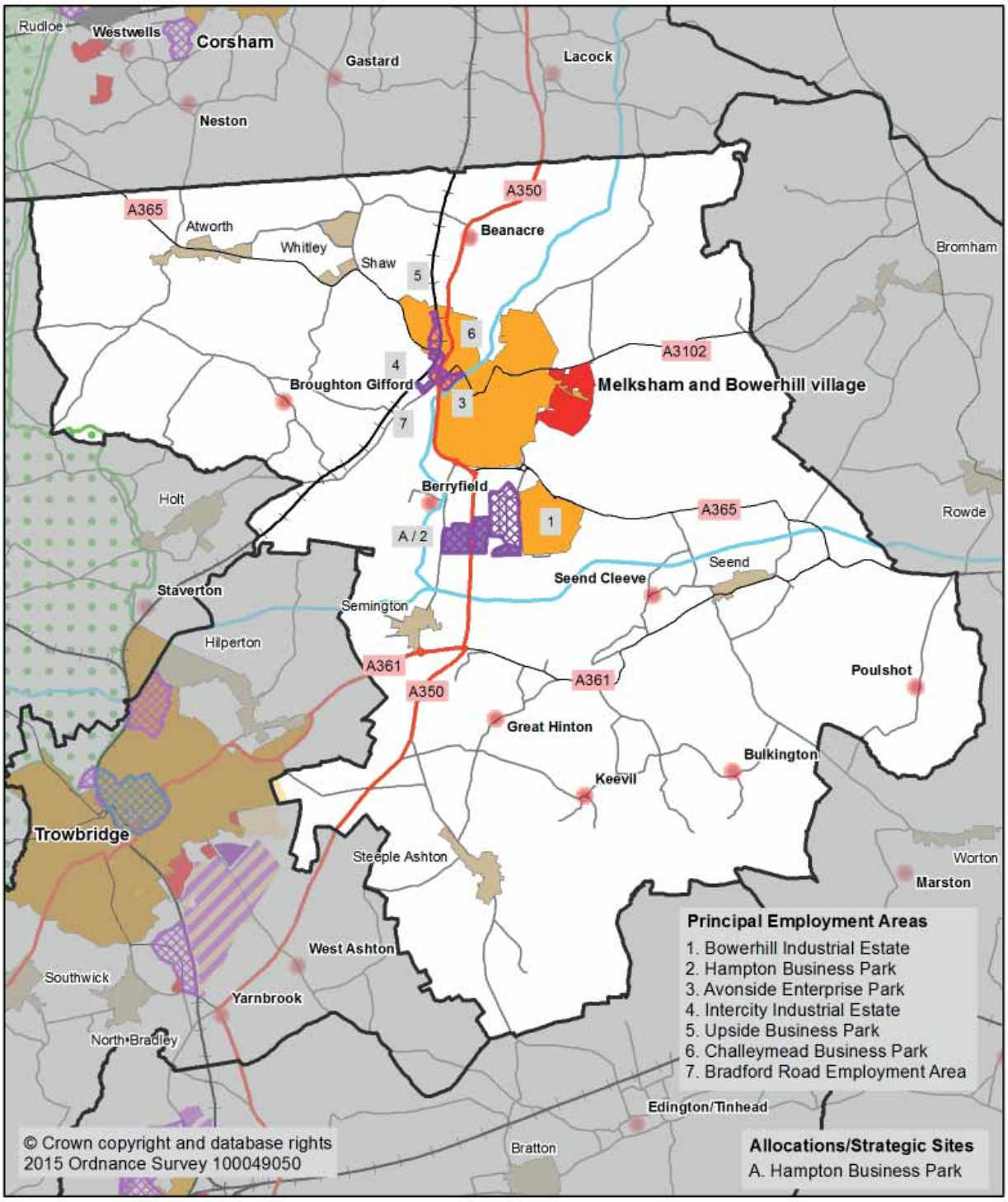
- development at Melksham should protect the historic environment and in particular should protect the historic setting of the Spa

- Shaw and Whitley are being planned for together due to their close proximity and the importance of ensuring future development is coordinated across the wider area.

How will the Melksham Community Area change by 2026?

5.84 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, taking full advantage of its canal and riverside location. The River Avon, Kennet and Avon Canal and the restored Wilts and Berks Canal will provide social, environmental and economic assets to the area as part of a sustainably used green infrastructure network.

Figure 5.10 Melksham Community Area



Core Policy 15

Spatial Strategy: Melksham Community Area

Development in the Melksham Community Area should be in accordance with the Settlement Strategy set out in Core Policy 1.

Market Towns: Melksham and Bowerhill village

Large Villages: Atworth, Seend, Semington, Shaw / Whitley and Steeple Ashton.

Small Villages: Beanacre, Berryfield, Broughton Gifford, Bulkington, Great Hinton, Keevil, Poulshot and Seend Cleeve.

The following Principal Employment Areas will be supported in accordance with Core Policy 35: Bowerhill Industrial Estate, Hampton Business Park, Avonside Enterprise Park, Intercity Industrial Estate, Upside Business Park, Challeymead Business Park and Bradford Road Employment Area.

Over the plan period (2006 to 2026), 6 ha of new employment land (in addition to that delivered or committed at April 2011) will be provided, including:

Hampton Business Park	Saved West Wiltshire District Plan Allocation	Up to 6 ha

Over the plan period approximately 2,370 new homes will be provided of which about 2,240 should occur at Melksham. Approximately 130 homes will be provided in the rest of the Community Area. Growth in the Melksham Community Area over the plan period may consist of a range of sites in accordance with Core Policies 1 and 2.

Development proposals in the Melksham Community Area will need to demonstrate how the relevant issues and considerations listed in paragraph 5.83 will be addressed.

Table 5.9 Delivery of Housing 2006 to 2026 - Melksham Community Area

	Requirement 2006-26	Housing already provided for		Housing to be identified	
		Completions 2006-14	Specific permitted sites	Strategic sites	Remainder to be identified
Melksham Town[40]	2,240	1,239	390	0	611
Remainder	130	69	10	0	51
Community Area total	2,370	1,308	400	0	662

Melksham link project

5.85 The proposed Melksham link project would provide a canal link to the south west of Melksham between the Kennet and Avon Canal and the River Avon, and to the north east of Melksham between the River Avon and the historic alignment of the Wilts and Berks Canal. The project provides a significant opportunity to improve the green infrastructure in the Community Area and provide a welcome boost to tourism, regeneration and the local economy. It also offers an opportunity to promote sustainable transport through the provision of walking and cycling routes, including providing linkages between Semington and Berryfield and Melksham town centre. The canal project and the link to the River Avon could particularly assist with the regeneration of Melksham town centre, and this is something which should be considered further through a 'town plan' or similar document. The proposed route will be protected using the same approach as that for safeguarding historic canal alignments, as set out in Core Policy 53 (Wilts and Berks and Thames and Severn Canals). Canal proposals along this route will need to demonstrate that particular concerns around water abstraction, water quality, biodiversity and flood risk have been fully addressed, and that adequate facilities for sewage disposal and waste collection will be provided. Canal proposals must also have regard to the status and objectives of the River Avon, as set out in the Severn River Basin Management Plan (2009) prepared under the Water Framework Directive.

APPENDIX I - JOINT MELKSHAM WITHOUT NEIGHBOURHOOD PLAN



Joint Melksham Neighbourhood Plan 2

2020 – 2038

Referendum Version

MELKSHAM NEIGHBOURHOOD PLAN

Overview Information

This Neighbourhood Plan has been prepared by the Joint Melksham Neighbourhood Plan (JMNP) Steering Group. It is the second edition Neighbourhood Plan which reviews and updates the first edition of the JMNP which was formally 'made' in July 2021.

Together with its associated documentation the Joint Melksham Neighbourhood Plan 2 is to be used for this intended purpose only.

The Neighbourhood Plan was prepared, submitted and examined against the December 2023 version of the National Planning Policy Framework.

Related information and the Plan evidence base can be found on the website: melkshamneighbourhoodplan.org

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Thanks and acknowledgements to:

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Neighbourhood Plan Consultants – **Place Studio**, supported the Steering Group and the Town and Parish Councils througout the entire process.

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Foreword

The first Joint Melksham Neighbourhood Plan (JMNP) 2020 – 2026 was brought into force on 1st July 2021 when our community gave it the thumbs up, through a positive community referendum result. It was therefore adopted as part of the Wiltshire Development Plan to be used to guide and decide planning applications.

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

To achieve this Melksham Town and Melksham Without Parish Councils and the Steering Group jointly launched the review of the Neighbourhood Plan to look ahead to 2038. The result is this second edition of the Joint Melksham Neighbourhood Plan (JMNP2). It has been updated and added to in order to make sure it remains up-to-date, forward looking and strong.

This is a bold Plan that goes beyond minimum requirements, with the aim of getting the best possible outcomes from development for our communities as well as providing a legacy for future generations from a plan-led regeneration of brownfield sites.

It tackles the difficult issue of housing shortage and need, by taking a positive and proactive approach to managing future development. It prioritises the regeneration of both the Cooper Tires and the Old Library site to support the delivery of homes, jobs and town centre vitality. Both of these projects attracted strong community support at the consultation stage.

At Shaw and Whitley, the strategy protects the separate identities of each village and enables the delivery of much needed smaller and more affordable homes.

The Plan even seeks to ensure that development granted at appeal, such as land South of Western Way, delivers on local priorities.

From those members of our community who are part of our Steering Group, to the people who joined our working groups, to those who have responded to our consultations; it's local people who have helped to shape this update.

Our thanks to the many of you who have taken the time, in one way or another, to contribute to this Plan, to make sure it stays bang up-to-date and gives us the strongest possible say in local planning decisions.

David Pafford

Chair of Melksham Neighbourhood Plan Steering Group and Melksham Without Parish Councillor

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1 Introduction

1.1 What is a Neighbourhood Plan?

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

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

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

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

1.1.4 Melksham, local villages and our rural parish is a great place to live. It has a good range of housing choice, a strong economy, good transport connections, an historic town centre, green spaces, the new Campus, beautiful countryside and the River Avon. Consequently, it is a focus of much housing development. It is therefore vital that our Neighbourhood Plan maximises its powers to plan and manage growth in the context of the Wiltshire Local Plan Review (LPR) which will replace the Wiltshire Core Strategy, with a Local Plan looking ahead to 2038[1].

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

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

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

1. Wiltshire's Local Plan, the Wiltshire Core Strategy, was adopted in 2015, and therefore must be reviewed.

1.2 Reviewing the JMNP

1.2.1 There is no set time period within which Neighbourhood Plans must be reviewed, but it is imperative that the JMNP is kept up to date and strong beyond the end date of 2026.

1.2.3 The first edition of the JMNP was adopted (or 'made' to use the planning term) in 2021. Due to the early stages of the Local Plan Review at the time, the decision was taken that site allocations for the town should be considered in a review of JMNP1 once the Local Plan Review had progressed further and set out housing requirements. In the winter of 2024, the draft Local Plan was submitted to the Secretary of Stage for examination. It sets out a strategy where the majority of new homes and jobs will be provided at Melksham, and included housing requirements for the whole Neighbourhood Plan area.

1.2.4 Though the emerging Wiltshire Local Plan has yet to go through the crucial final stage of examination at the point of publication of this Plan, it sets the context for looking ahead to 2038 and development in and around Melksham. This reviewed and updated JMNP2 enables our community to continue a 'Plan Led' (rather than developer-led) approach to development, and links into the Local Plan review process and the emerging policies of the draft Local Plan. Therefore the Steering Group have continued to work closely with Wiltshire Council in order that the JMNP can look ahead towards 2038 and stay up-to-date.

1.2.5 Undertaking the review:

- Gives our community a much stronger and clearer say in what development goes where.
- Saves and updates the first Plan's adopted policies. It will add stronger evidence so that our plan can continue to protect our economy, environment and community life and deliver on its long term aims. No policy areas have been removed.
- Adds new policies to protect our green spaces and valued countryside that have become high priorities since the first Plan.
- Refreshes and strengthens how the Neighbourhood Plan informs and shapes development and conservation in the town, villages and countryside of the Plan Area.

Jargon Alert!

Though we have tried to make this a reader friendly document, planning can be full of unavoidable jargon, so a glossary of key terms is included at the end of the Plan (click for page 116).

1.3 What changes has JMNP2 Introduced?

1.3.1 Updated Existing Policies:

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

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

- New Policy 7: Allocation of various sites for housing
- New Policy 16: Local Green Spaces - a designation to protect valued green spaces from development.
- New Policy 19: Separation of Settlements – to protect the countryside that acts to separate our town and villages.

1.3.3 Updated Priority Statements;

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

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

What is Sustainable Development?

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

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

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

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

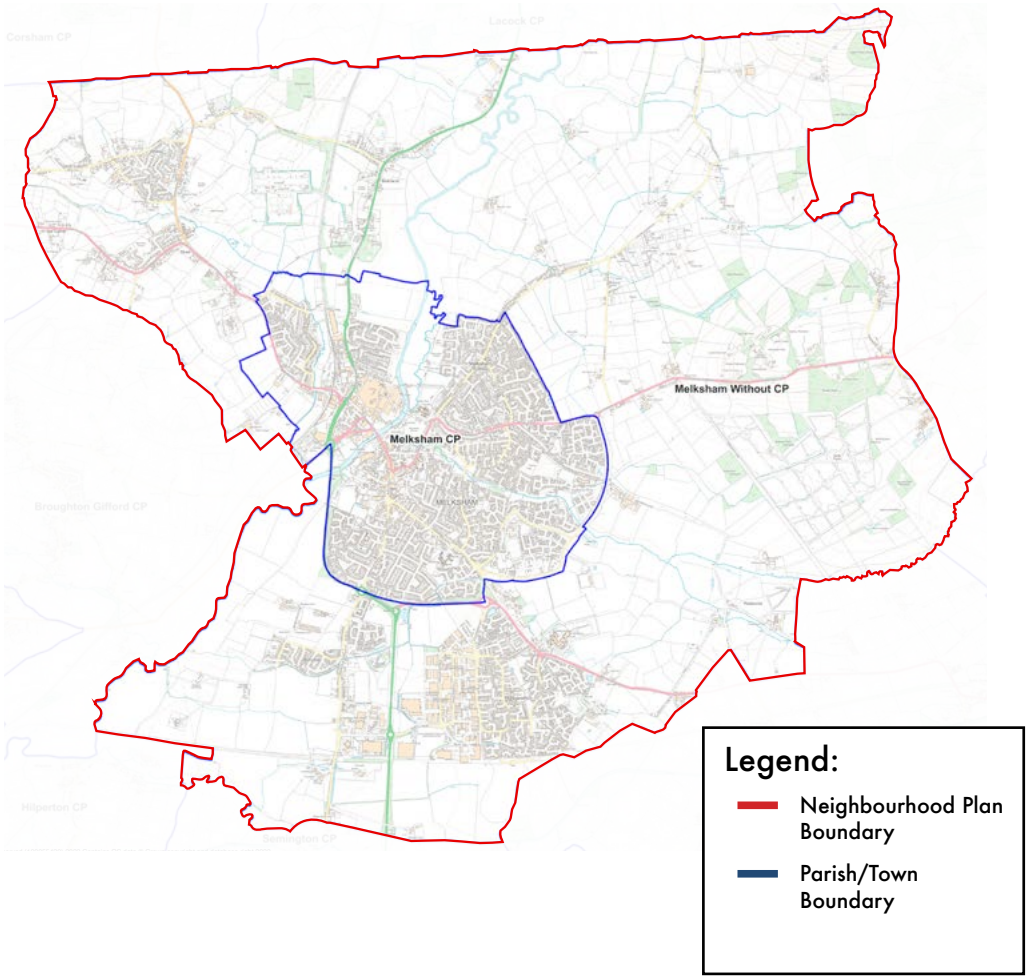
1.4.3 The Plan covers the period 2020 – 2038.

1.5 Who has prepared the JMNP2?

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

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

Figure 1: Joint Melksham Neighbourhood Plan Area



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1.6 How does the JMNP represent the community's views?

1.6.1 The Steering Group of local representatives worked hard to make sure this second edition of the JMNP continues to reflect the hopes, and addresses the concerns, of the community of the town and the rural area for the future development of our area.

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

1.6.3 Following a positive local referendum community vote for JMNP, it will continue to be actively used and monitored by the Parish and Town Council, as community representatives, to respond to planning applications. It will also be used by applicants and importantly by Wiltshire Council (and at times by planning inspectors when deciding on appeals) in reaching planning decisions.

1.7 Navigating the Plan

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

1.7.2 Planning policies form the main focus of this Plan.

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

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

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

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

1.7.6 Priority Statements (pages 113 onwards) are also included to illustrate the commitment of the two Councils to bring their influence to bear on things we can't address in this Plan, but which are important issues to our local community.

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

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

2 Setting the Agenda to 2038

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

2.1.1 Consultation on the Neighbourhood Plan as well as the current Wiltshire Core Strategy highlighted the following key issues faced by town and rural areas:

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

2.1.2 These issues could not be addressed successfully through independent plans. At its simplest, the whole Neighbourhood Plan area operates as a classic market town and catchment. This interdependence is further highlighted by the likelihood of future housing growth, much of which is likely to take place in Melksham Without. A single, joint Plan increases the value for the communities of both town and parish.

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

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

2.2 Neighbourhood Plan Review: Updating key issues and Evidence

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

2.2.2 Throughout the spring and summer of 2022, the Neighbourhood Plan Steering Group undertook a series of community and stakeholder communication and consultations to build community input into the priority issues that the updated second edition of the JMNP should address. This enabled areas

of new priority to be raised and focused on updating and adding evidence in the key local issues of:

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

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

2.2.3 Throughout 2022 and early 2023, further technical analysis was undertaken to understand changing circumstances and context relating to:

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

Maps and Evidence Base Reports

All maps and evidence base reports referenced in the Plan are also available on melkshamneighbourhoodplan.org as individual files

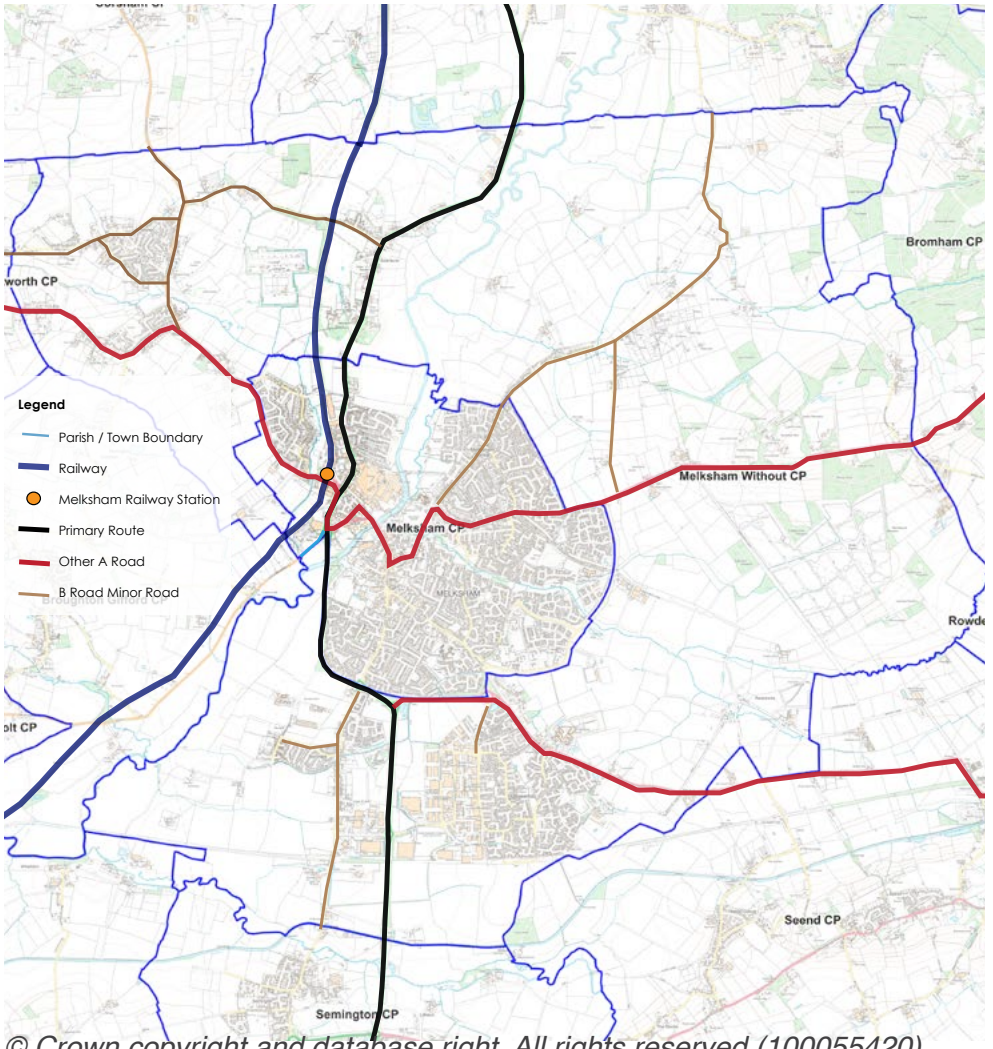
2.3 Key facts about the Neighbourhood Plan area

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

- The total resident population of the Neighbourhood Plan area (Melksham Town and Melksham Without) in 2021 was estimated to be 25,300, an increase of 15.4% since 2011 when the population was 21,907[2].
- There are lower than national averages of people between the ages of 15-44. The predominant age band was '50 to 54' closely followed by '55-60' which is a little above the national average and our population is ageing[3].
- A key local employer (Cooper Tires) closed its factory in December 2023.
- We have a well qualified resident work force. There is a strong specialisation in the Manufacturing sector as its concentration of employment in that sector is considerably higher than the national average.[4]
- We have a railway station, but public transport generally is limited in the area, and the area around the station is in need of investment and improvement.
- The Neighbourhood Plan area is strategically located between Chippenham and Trowbridge and on the A350 primary route corridor between the M4 and Poole. There is also a proposal for a bypass which will change the demand for services and working practices.

2. Wiltshire Intelligence Data Sets. Accessed July 2023
3. https://lichfields.uk/content/insights/solutions-to-an-age-old-problem
4. Wiltshire Council Employment Land Review Update 2023

Figure 2: Rail and Key Roads Routes



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2.4 The wider context

2.4.1 The National Planning Policy Framework[5] (NPPF) together with Planning Guidance covers most forms of development and sets out the Government's economic, environmental and social priorities for planning in England. Neighbourhood Plans must have regard to and be in general conformity with principles and policies in the NPPF. The NPPF is regularly updated, most recently on 12 December 2024. This Plan was submitted before this date, and therefore refers to the NPPF dated December 2023.

2.4.2 Neighbourhood Plans are also required to be in general conformity with the strategic policies of the Local Plan. In Wiltshire, our current Local Plan is the Wiltshire Core Strategy (WCS), adopted in 2015. This incorporates Saved policies from former District Local Plans, and also includes the Wiltshire Housing Site Allocations Plan. The Local Plan, together with Neighbourhood Plans, forms the Development Plan for Wiltshire.

2.4.3 The Government requires every Local Plan to be reviewed at least once every five years. The Steering Group have held regular meetings with Wiltshire Council to ensure that the Neighbourhood Plan policies are updated within the changing context of the Local Plan Review. Policies in this second edition of the JMNP however reference the adopted policies of the development plan (Wiltshire Core Strategy) whilst taking into account the emerging Local Plan which will provide necessary and important updates to the Development Plan for Wiltshire, but it is important to note that it has not yet been through the process of independent examination.

2.4.4 The qualifying bodies acknowledge that the adoption of the Wiltshire Local Plan will alter the development plan in the county. In this context the need or otherwise for a further partial review of the Plan will be assessed within six months of the adoption of the Local Plan. The qualifying bodies already have robust measures in place to monitor the effectiveness of the neighbourhood plan. This process will continue throughout the Plan period. Specific attention will be given to the delivery of the five allocated sites. Melksham Town Council will continue to work with potential developers to secure the regeneration of the Coopers Tires site (Policy 7.1).

2.5 Emerging Local Plan Housing Requirements and Site Allocations

2.5.1 Wiltshire Council's emerging Local Plan sets out how many homes are required looking ahead to 2038. Draft housing site allocations are included in the emerging Local Plan to the north-east and south-east of Melksham. These allocations meet the majority of the housing requirements (and employment requirements) for Melksham. No allocations are made at Shaw or Whitley in the emerging Local Plan.

2.5.2 For the purposes of Neighbourhood Planning, Wiltshire Council are also required to provide housing requirements that reflect the overall strategy for pattern and scale of development.

5. National Planning Policy Framework, December 2023 version

At Melksham the emerging Local Plan suggests a requirement of around 200 dwellings. In planning terms, the villages of Shaw and Whitley are considered together as a 'large village' which is subject to a separate housing requirement of around 70. Together the emerging overall housing requirement figure for the JMNP plan area is therefore approximately 270[6].

2.6 The approach to the Neighbourhood Plan

2.6.1 Working in partnership with Wiltshire Council, and taking into account the emerging Local Plan has been essential in the formulation of the updated JMNP2.

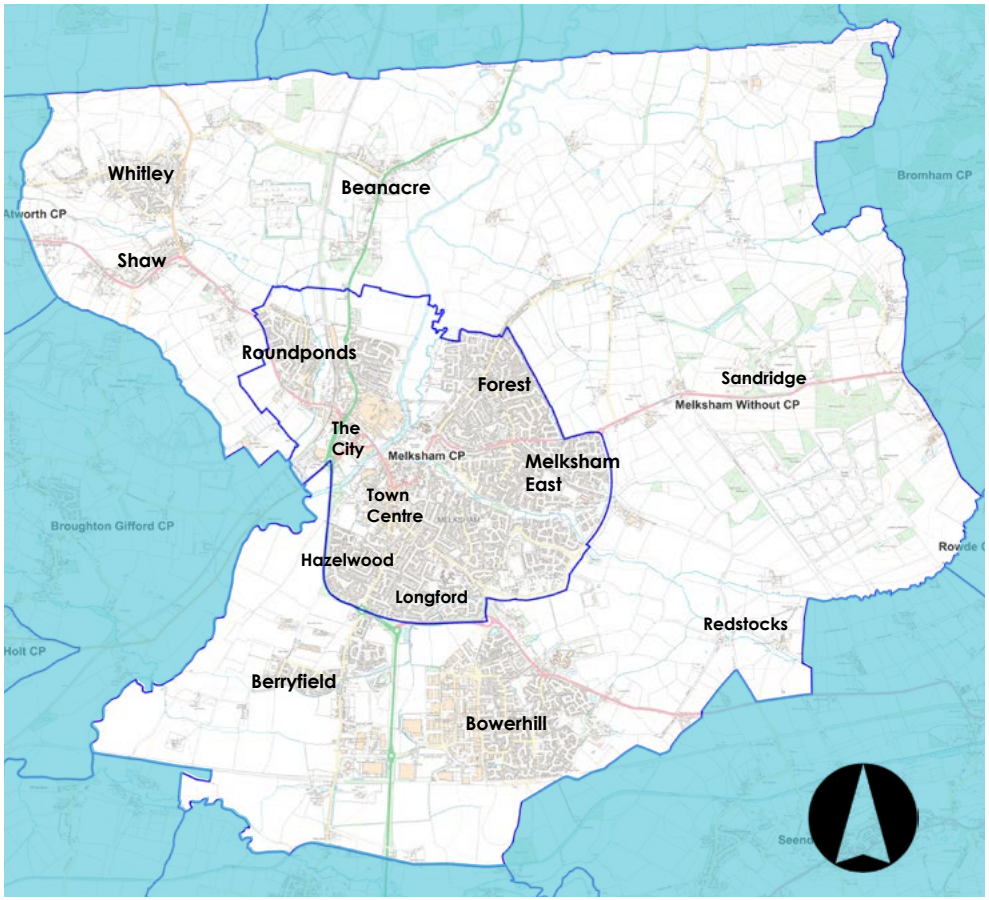
2.6.2 Although housing requirement figures for neighbourhood plan areas are not binding, neighbourhood planning bodies are encouraged by the government to plan to meet their housing requirement, and where possible to exceed it as "*a sustainable choice of sites to accommodate housing will provide flexibility if circumstances change, and allows plans to remain up to date over a longer time scale*"[7]. The Steering Group therefore felt it important to review potential development sites in the Plan area with a particular focus on what community benefit development could offer. Landowners submitted potential land for development, and more than 100 sites have been subject to initial independent assessments, some emerging as potentially suitable and some as unsuitable (see the Housing Evidence Base Report available on the Neighbourhood Plan website). All this information has given us an informed evidence base from which to make an informed and proactive approach to development in our Neighbourhood Plan area.

6. *Wiltshire Local Plan. Planning for Melksham. September 2023*

7. *Planning Practice Guidance: Neighbourhood Planning. Latest update March 2020 Paras 103 - 104*

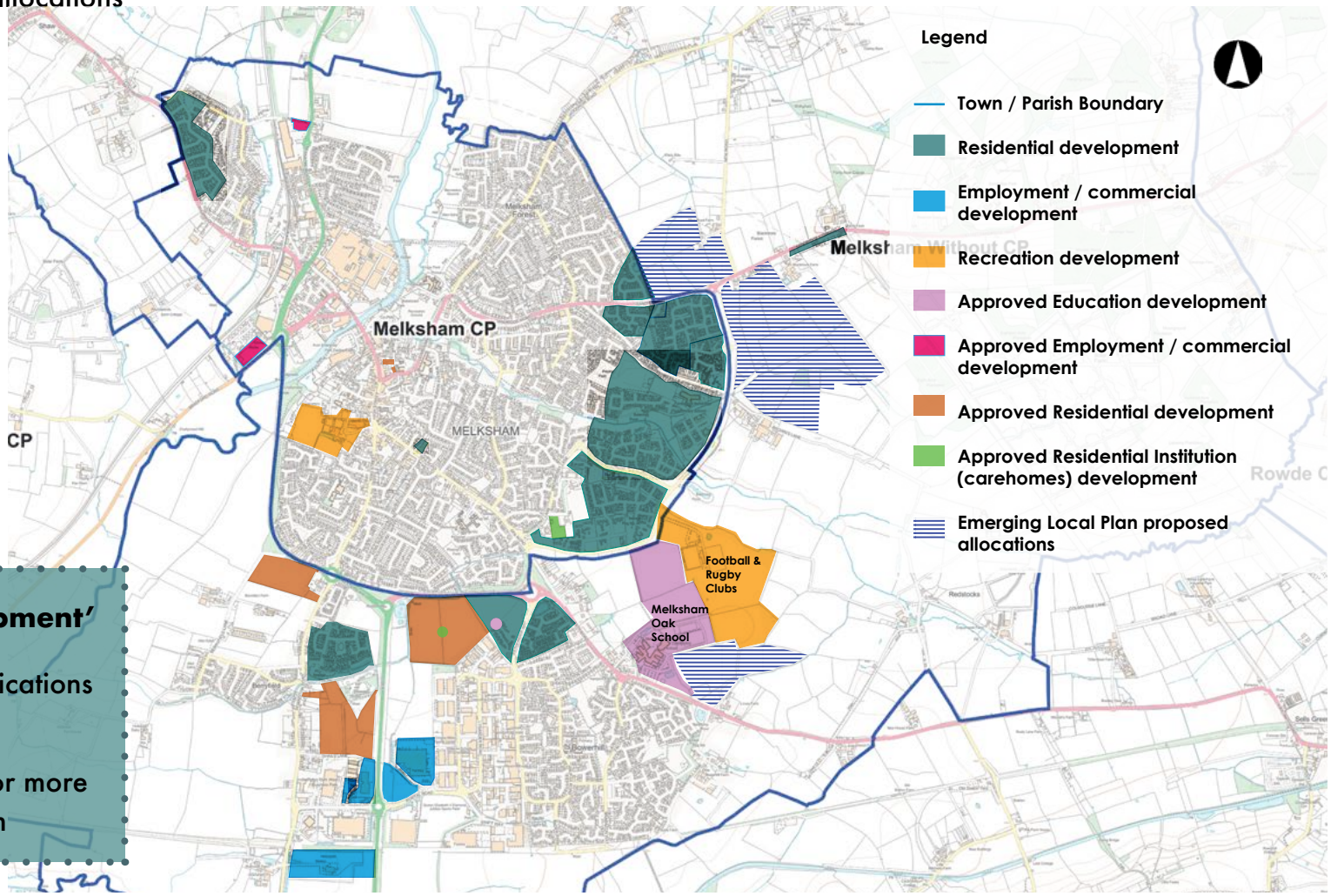
2.6.3 The Neighbourhood Plan is aiming to meet many of the required housing numbers through brownfield allocation. For more detail on the approach to housing allocation, turn to page 46.

Figure 3: Plan Area Settlements and Neighbourhoods



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Figure 4: Major planning permissions granted during the current Wiltshire Core Strategy (Adopted 2015) period (at January 2025) and emerging Local Plan allocations



What is 'major development'

Major development includes applications that involve:

- the provision of 10 dwellings or more
- a floorspace of over 1,000sqm

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2.7 Melksham Town Introduction

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

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

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

2.7.4 The streets around the River Avon and up to the Market Place were the sites of small industries. Independent weavers worked at home in their cottages. Other local trades and crafts typical of a small market town, including tanners, blacksmiths and millers, occupied small workshops and legacies of the town's industrial past can be seen in the weavers' cottages in Canon Square and the two round houses, originally used for drying cloth.

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

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

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

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


Church Walk, Melksham


Blenheim Park Bowerhill


War Memorial


Berryfield


St Barnabas Church, Beanacre


Christ Church Shaw


Methodist Church Whitley


Melksham Town Hall

2.8 Melksham Without Introduction

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

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

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

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

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

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

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

2.9 Sustainable Development and Climate Change

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

2.9.2 Recent reports[8] illustrate how urgent it is that action is taken. Extreme weather events have been seen around the world, and now there is incontrovertible evidence that human activity has raised and continues to raise the risk of extreme weather.

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

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

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

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

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

2.9.8 The Parish Council also encourage, where appropriate, the planting of trees to combat climate change and help reduce CO2 in the atmosphere, by signing up to the Tree Charter (www.treecharter.uk). They have also worked with volunteers to plant hundreds of trees supplied by the Woodland Trust. The community in Shaw and Whitley have planted their own trees too. The Town Council have regularly organised community tree planting schemes where residents of Melksham can obtain free trees for planting in their gardens. In November 2023 more tree planting took place.

8. *IPCC, 2018: Summary for Policymakers. In: Global Warming of 1.5°C. An IPCC Special Report on the impacts of global warming of 1.5°C above pre-industrial levels*

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

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

- Promoting green, environmentally sustainable building standards – **Policy 1: Sustainable Design and Construction**

- Supporting the installation of electric (or other ultra-low emission) vehicle charging points – **Policy 4: Ultra Low Emission Vehicles**

- Supporting a vibrant town centre so that people can shop locally – **Policy 9: Town Centre**

- Supporting local employment opportunities to reduce the need for out-commuting – **Policy 10 Employment Sites**

- Giving proper consideration to routes for buses, cyclists, footpaths and green/blue infrastructure in our housing developments – **Policy 11: Sustainable Transport and Active Travel**

- Protecting or promoting a network of biodiverse green spaces and green corridors, conserving established trees and hedgerows – **Policy 12: Green and Blue Infrastructure** and **Policy 16: Trees and Hedgerows. This also links into the issue of flood risk in our area and Policy 3: Flood Risk and Natural Flood Management** which highlights the importance of a holistically planned Green and Blue Infrastructure in conjunction with the flood risk assessment / drainage strategy in order to manage surface water runoff across a site.



3 The Vision and Objectives

3.1 The Vision

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

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

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

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

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

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

3.2 Objectives

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

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

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

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

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

Great places for shopping, working and getting around through:

7. Protecting and enhancing the vitality of Melksham town centre.

8. The retention, regeneration and intensified use of previously developed employment land.

9. Supporting improved transport infrastructure for the increasing Neighbourhood Plan Area population.

10. Encouraging wheeling and walking and journeys by rail and bus to reduce the need to travel by car.

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

11. Protecting, connecting and increasing our network of green spaces.

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

13. Protecting, improving and expanding existing services and community facilities to promote health, education and social needs.

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

14. Protecting settlements' rural setting and countryside gaps across the Plan area.

15. Conserving and enhancing the quality of the natural landscape.

16. Ensuring that new development is sympathetic to our built heritage and the character of the area, with high standards of design.



Riverside Walk

4 Planning Policies

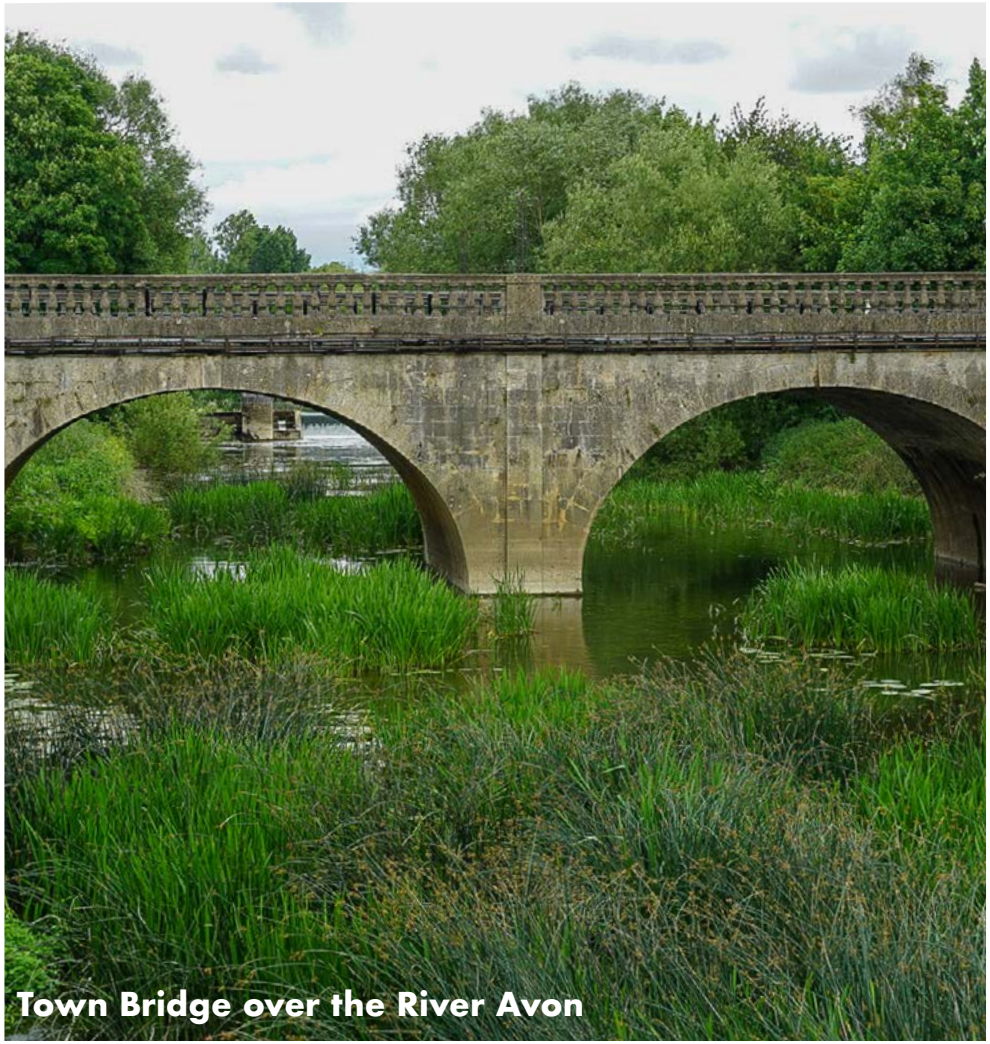
The planning policies are presented in five overall sections, related to the Plan objectives.

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

What is a Planning Policy?

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

(Planning Practice Guidance: Neighbourhood Planning. Latest update March 2020)



Town Bridge over the River Avon

4.1 Index of Policies

Sustainable development and climate change

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

Housing and infrastructure needs

Policy 5: Pre-application Community Engagement
Policy 6: Housing in Defined Settlements
Policy 7.1: Land at Cooper Tires
Policy 7.2: Land at the Former Melksham Library Site
Policy 7.3: Land South of Western Way, Bowerhill
Policy 7.4: Land at Whitley Farm, Whitley
Policy 7.5: Land at Middle Farm, Whitley
Policy 8: Infrastructure Phasing and Priorities

Shopping, working and getting around

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

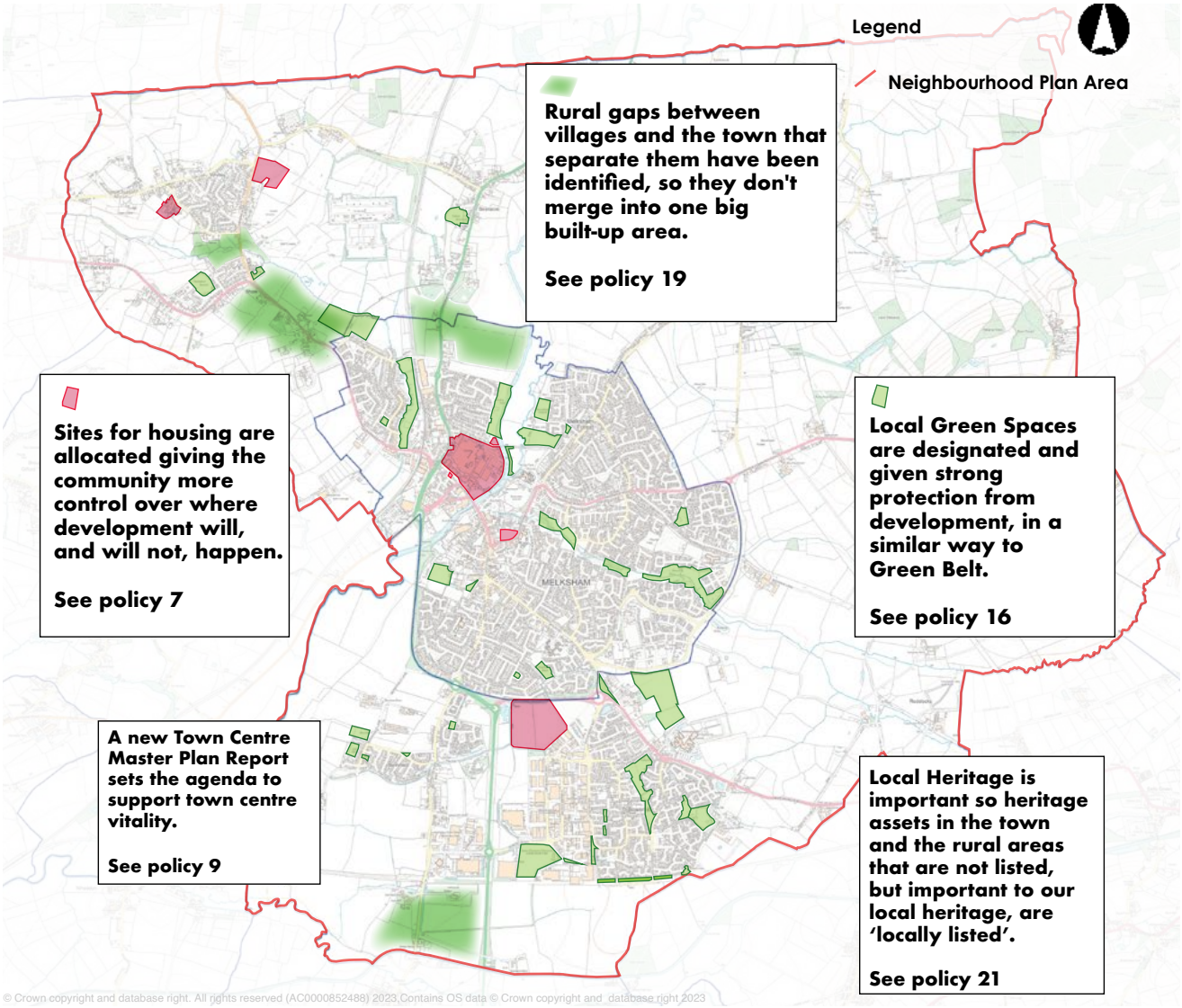
Community well-being and nature

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

Built and natural environment

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

Figure 5: Strategy Overview



Sustainable Development and Climate Change



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

Policies in this section:

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

Sustainable Design and Construction

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

Policy 1: Sustainable Design and Construction

As appropriate to their scale, nature and location, development proposals should demonstrate how they have mitigated and been designed to adapt to the impacts of climate change. This includes:

a. **the submission of a Sustainable Energy Strategy to demonstrate how carbon emissions are minimised, with the target of zero carbon in operation (regulated and unregulated energy);**
b. **embedding the Energy Hierarchy within the design of buildings by prioritising fabric first, orientation, design, and landscaping, to minimise energy demand for heating, lighting, and cooling, as well as maximising renewable energy generation. Proposals should respond positively to opportunities to improve space heating and energy consumption by considering a range of low-carbon and renewable technologies;**
c. **demonstrating good connections to existing services and facilities, and/or a mix of uses that minimises the need to travel by private vehicle;**
d. **using carbon sequestration and other sustainable approaches such as shade; and**
e. **the retention of existing buildings where practicable, and the incorporation of associated retrofitting measures to improve the energy performance of existing buildings.**

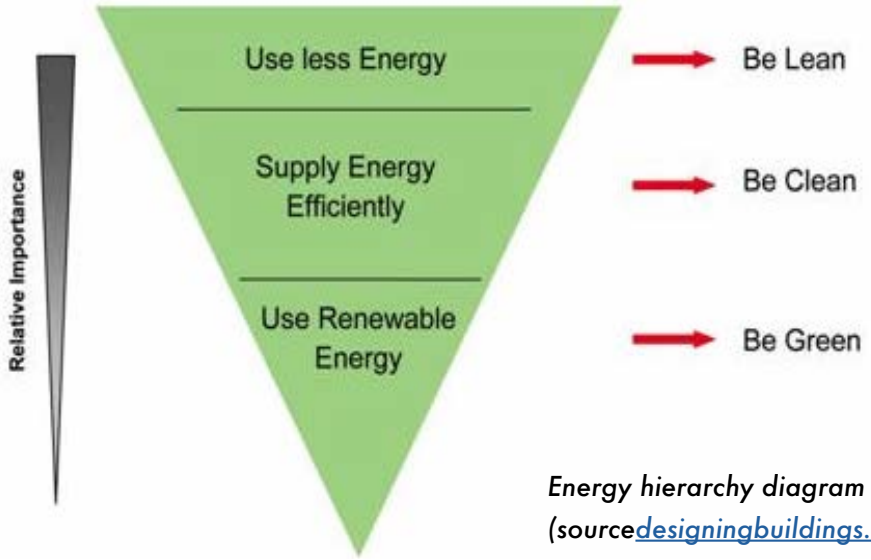
The reason for the policy

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

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

4.2.3 Whilst the policy is ambitious, it has been written to 'support' development that complies and will need to be applied flexibly to decisions on planning applications where the applicant can demonstrate that meeting the higher standards is not technically feasible. This reflects the requirements of the Written Ministerial Statement on Local Energy Efficiency Standards[9] that sets out that policies should generally not apply energy efficiency standards that go beyond current or planned building regulations.

4.2.4 The energy hierarchy is a core principle for this policy which means improving building materials, energy efficiency and minimising space heating requirements, before installing renewable energy and then offsetting residual energy if required. It continues to acknowledge the importance of a holistic approach to meeting the urgent aim of lowering carbon emssions. It is recognised that a range of factors in the built environment needs to be considered, including how we design and lay out places that incorporate nature and making it easier to get around without the car.



Energy hierarchy diagram (source designingbuildings.co.uk)

9. *Planning - Local Energy Efficiency Standards Update13th December 2023*

4.2.5 The Net-Zero Toolkit[10] has been created to make Net Zero carbon new build and retrofit more accessible. It has been created for building professionals (developers, contractors, architects and engineers) and is also relevant to self-builders, planning officers and other housing professionals. The guide recommends operational targets for new homes and retrofitting existing homes, which are consistent with the LETI Climate Emergency Design Guide. It outlines that energy use targets for space heating, and total energy consumption are more transparent and robust than carbon reduction targets and are the best way to ensure zero carbon is delivered in practice.

4.2.6 In their report, 'UK Housing: Fit for the Future?' the Committee on Climate Change (CCC) warns: "We will not meet our targets for emissions reduction without near complete decarbonisation of the housing stock. Energy use in homes accounts for about 14% of UK greenhouse gas emissions. These emissions need to fall by at least 24% by 2030 from 1990 levels, but are currently off track... The technology exists to deliver homes that are low-carbon, energy efficient and climate-resilient... The costs are not prohibitive, and getting design right from the outset is vastly cheaper and more feasible than having to retrofit later." The Net Zero Toolkit indicates that a net zero home can be delivered for a cost increase of 2-6% over Part L Building Regulations 2021.

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

4.2.8 This policy also relates to existing buildings which may be retrofitted to improve energy efficiency. For heritage assets, established best practice in the form of technical guidance including climate change adaptation, retrofit and energy efficiency advice is offered by Historic England[11].

10. Levitt Bernstein, Elementa, Passivhaus Trust and Etude commissioned by West Oxfordshire, Cotswold and Forest of Dean District Councils, funded by the LGA Housing Advisers Programme 2021

11. Adapting Historic Buildings for Energy and Carbon Efficiency Advice Note 18 from Historic England was published in July 2024

Towards Net Zero

The government set a legally binding target to reduce the UK's greenhouse gas emissions by 100% by 2050, compared with 1990 levels. This is known as the 'net zero target'.

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

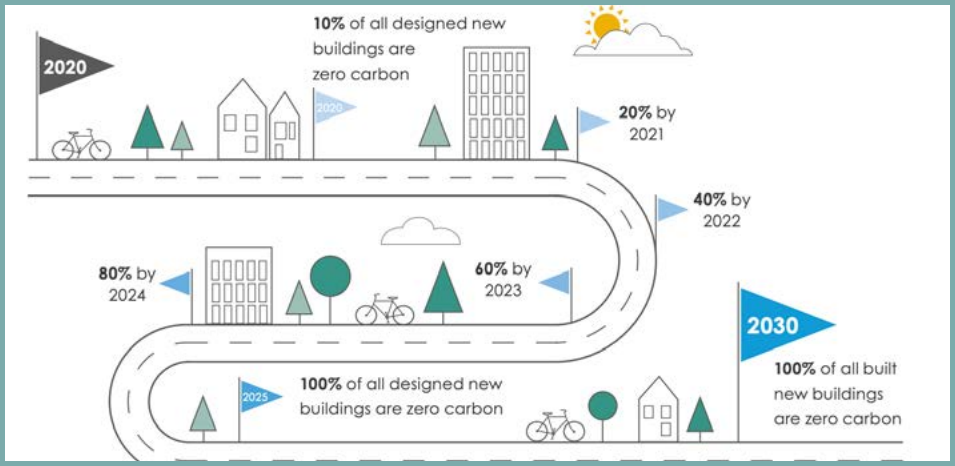
Wiltshire Council also include a policy on Sustainable Construction and Low Carbon Energy (policy 85) in the emerging Local Plan, which also proposes the use of operational targets. The policy sets out an expectation that new dwellings will demonstrate the following operational standards:

- space heating demand less than 30kWh/m2/annum;
- total energy use less than 40kWh/m2/annum;
- on site renewable energy generation to match total energy use

Right: Getting to Zero diagram from the Leti Climate Emergency Design Guide

The use of the following standards may help to demonstrate that buildings are built to high environmental standards:

- The Home Quality Mark (HQM) helps house builders to demonstrate the high quality of their homes. It gives householders the confidence that the new homes are well designed and built, and cost effective to run.
- BREEAM (Building Research Establishment Environmental Assessment Method) is a sustainability assessment method that is used to masterplan projects, infrastructure and buildings.
- Other standards include Passivhaus or AECB Building Standard. Passivhaus buildings provide a high level of occupant comfort while using very little energy for heating and cooling.



Local Renewable and Low Carbon Energy

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

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

Policy 2: Local Renewable and Low Carbon Energy and Associated Infrastructure

1. Proposals for renewable energy, low carbon energy generation projects/developments, and associated infrastructure, including Battery Energy Storage Systems (BESS), will be supported where it can be demonstrated that:

a. the siting and scale of the proposal is appropriate to its setting;
b. the proposal will not result in adverse impacts on the local environment which cannot be satisfactorily mitigated;
c. the proposal does not create an unacceptable impact on local amenity and safety; and,
d. the proposal does not have an unacceptable degree of impact on a feature of heritage, natural or biodiversity importance. Proposals for stand alone, ground mounted solar photovoltaic development should demonstrate, where possible, that some form of agricultural activity will continue, and/or there are biodiversity improvements around arrays; and,
e. the proposal, when taking into consideration other renewable and low carbon energy developments and associated infrastructure in the area, will not result in an unacceptable cumulative impact.

2. Schemes which result in direct benefits to the local community such as energy supplied directly, or financial benefits, will be supported. Proposals for community energy generation projects (with full or partial ownership and/or control by a local community) will be strongly supported. In addition, schemes where the energy produced can be used on or near the generation site or where energy storage is incorporated will be supported. In both cases, proposals should comply with the criteria in the first part of this policy.

The reason for the policy

4.3.1 Renewables, such as wind and solar power, are important ways to achieve the legally binding net zero target with the production of decarbonised electricity. Associated infrastructure to distribute and store renewable energy is necessary to respond to fluctuations in supply and demand[12]. The Climate Change Committee points out that "new storage systems, beyond simply the use of batteries" is needed.

4.3.2 As part of moving towards the net zero target in a changing climate, this Plan supports generation of zero or low carbon energy, particularly where it enables communities to take a more active role in, and get direct benefit from, the production of renewable and low carbon local energy. However, it is vital that views of our communities and impacts on our landscape, biodiversity and heritage are taken into account when considering any proposals for renewable, or low carbon energy generation and associated infrastructure. Not just for any individual proposal, but the cumulative impact must also be taken into account.

4.3.3 The policy refers to protection of local amenity and safety. This includes issues such as noise from battery energy storage systems, and glare/glint from solar panels, which can be a problem experienced locally. Wherever practicable, proposals that harness existing buildings and structures and/or that are located on brownfield land, should be selected as a preference to the use of greenfield land for renewable energy generation or associated infrastructure.

Community Energy generation in Wiltshire

Nadder Community Energy Ltd raises money in their local area by selling shares which are paid back over a 20 year period, plus interest; this money is used for local solar panels or other renewable energy systems. In a single year they generated approximately 472,458 kw electricity and raised over £90,000 for the community (www.nadderce.org.uk)

Renewable and Low Carbon Energy

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

The government's planning practice guidance notes that BESSs are a way "to use energy more flexibly and de-carbonise our energy system cost-effectively"[13]

12. Research Briefing Battery energy storage systems April 2024

13. Planning Practice Guidance, Renewable and low carbon energy, last updated August 2023, para 32

Flood Risk and Natural Flood Management

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

Policy 3: Flood Risk and Natural Flood Management

Natural flood management works to conserve and enhance the ecological flood storage value of the water environment, including watercourse corridors and catchments, will be supported. Development proposals in locations with known flooding issues should include appropriate mitigation and construction methods, and, where appropriate, contributions towards wider catchment projects.

As appropriate to their scale, nature and location, development proposals should demonstrate how flood risk is mitigated. This approach should include measures to reduce the amount of rainwater run-off and incorporate Sustainable Drainage Systems.

The reason for the policy

4.4.1 For the communtiy, there are strong concerns over development in high flood risk areas, and the importance of protecting homes from flood damage. Flood risk must not be increased by new development.

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

4.4.3 Any development has the potential to worsen surface water flooding. Paragraph 167 of the NPPF sets out that new development should make use of opportunities to reduce the causes and impacts of flooding, where appropriate, through the use of

natural flood management techniques. Where required, flood risk and ground water assessments should be undertaken and surface water drainage strategy must be developed and delivered. The drainage strategy must ensure that flood risk is addressed to 1 in 100-year storm event plus climate change in line with Environment Agency Guidance. This is particularly relevant to the South Brook catchment area which has been identified as a priority flood risk area due to surface water flooding.

4.4.4 This is an important issue recognised at national level. The National Design Guide, includes guidance on integrated water management that enhances the character of a place and makes it more resilient.

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

4.4.6 The Melksham Design Guidelines and Codes document which has been prepared as part of this updated Plan, includes a section which addresses water management (DC03.11), which sets out the importance of Sustainable Drainage Systems (SuDS), and includes a number of 'overarching principles' that should be applied in development to mitigate against the important issue of flood risk – right across our communities and especially in the areas with known surface water flooding issues. An important point to note is that Green and Blue Infrastructure should be holistically planned in conjunction with the flood risk assessment / drainage strategy in order to manage surface water runoff and implement high-quality Blue/Green SuDS solutions on site, and, where necessary, beyond.

South Brook

The South Brook catchment area has been identified as a priority flood risk area by both the Environment Agency and Wiltshire Council. Bristol Avon Rivers Trust (BART) have been working in the South Brook catchment area for the delivery of the Natural Flood Management (NFM) works.

"The catchment of the Southbrook is "flashy" – it rises very rapidly in response to rainfall. As recently as February 2022, this flood saw the Southbrook reach a record level – 1.71m. Anything that increases the flashiness of the catchment is highly undesirable. Any hardening of surfaces will be noticeable at the measuring station at Shaw School...and will significantly increase flood risk downstream (as well as within the villages)"

The Shaw and Whitley Community Emergency Group

Ultra Low Emission Vehicle Charging

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

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

Policy 4: Ultra Low Emission Vehicle Charging

Insofar as planning permission is required, proposals for the installation of public on-street electric charging facilities will be supported subject to heritage and other related design matters.

The reason for the policy

4.5.1 The need to drive private vehicles enables people to carry out their everyday business. However, facilitating the transition to low, or zero emission vehicles is key to lowering our carbon emissions, so increases in the availability of charging tecnology are welcomed and reflects a national drive towards Ultra Low Emission Vehicles[14].

4.5.2 Electric vehicle infrastructure in new development is required to be implemented in accordance with relevant national and local guidance. In support of Part S of Schedule 1 to the Building Regulations 2010, the government has published 'Infrastructure for the Charging of Electric Vehicles – Approved Document S (2021 Edition)'.

4.5.3 It is important that all new homes, regardless of tenure etc, enable people to safely and conveniently access ultra-low energy vehicle (EV) infrastructure. The Melksham Design Guidelines and Codes (2023) includes a checklist that includes consideration of how charging points are integrated into proposals.

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

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

14. Department for Transport, 2018: The Road to Zero Next steps towards cleaner roads transport and delivering our Industrial Strategy

4.5.6 Improvements to the Melksham railway station (see page 79 for more detail) since the first edition of our Plan have provided some initial electric car charging points in the car park. Plans to increase the provision to six charging points as the demand increases have been developed and are supported by the two councils. This both encourages electric car use, and use of the train, typically when commuting or shopping.

Ultra Low Emission Vehicles

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

- uses low carbon technologies
- emits less than 75g of CO2/km from the tailpipe
- is capable of operating in zero tailpipe emission mode for a range of at least ten miles.

Source: Vehicle Certification Agency



E-vehicle charging spaces

Housing and Infrastructure



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

Policies in this section:

Policy 5:	Pre-application Community Engagement
Policy 6:	Housing in Defined Settlements
Policy 7.1:	Land at Cooper Tires
Policy 7.2:	Land at the Former Melksham Library Site
Policy 7.3:	Land South of Western Way, Bowerhill
Policy 7.4:	Land at Whitley Farm, Whitley
Policy 7.5:	Land at Middle Farm, Whitley
Policy 8:	Infrastructure Phasing and Priorities

Community Engagement

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

Policy 5: Community Engagement

Development proposals should be prepared with early, proactive, proportionate, and effective engagement. Developers are therefore encouraged to follow the approach set out in the Melksham Community Engagement Protocol and the Wiltshire Council Statement of Community Involvement.

The reason for the policy

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

4.6.2 The importance and benefit of community engagement is strongly endorsed in national planning policy and guidance as key to shaping high quality places to live. The National Planning Policy Framework stresses that *"Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community".*[15]

4.6.3 Early discussion between applicants and the local community, as well as with the Local Planning Authority, from the earliest stages enables a more collaborative approach to the process of preparing a development proposal that will need to balance many factors as the design evolves. *"Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot."*[16]

4.6.4 The Planning Practice Guidance Note on Design[17] emphasises the importance of community engagement:

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

15. *National Planning Policy Framework, 2023. para 39*
16. *National Planning Policy Framework, 2023. para 137*
17. *Planning Practice Guidance, Design: Process and tools last update Oct 19*

4.6.5 The above policy and the Community Engagement Protocol (see Appendix 1, page 120) are intended to facilitate a structured approach to enable effective involvement of the local community in outline and full planning applications addressing all aspects of a proposal, from design and layout to issues on climate change and energy generation. Pre-application community engagement can also be equally beneficial for reserved matters applications.

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



Housing Development

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

Policy 6: Housing at Defined Settlements

1. Proposals for sustainable housing accommodated through development and redevelopment opportunities within existing settlement boundaries of the Plan area will be supported.

2. Housing outside settlement boundaries will be managed in accordance with the adopted Development Plan and should meet evidenced local housing need.

3. Development proposals for new housing should demonstrate how their housing types and tenures respond positively to meeting local needs, informed by the Melksham Neighbourhood Plan Area Housing Needs Assessment (2023), the Wiltshire Local Housing Needs Assessment, or any updates of these Assessments. As appropriate to their scale, nature and location, development proposals should respond positively to the following matters:

a. delivering rented and owner-occupied homes in a tenure-blind mix, design and layout;

b. increasing the supply of affordable homes in conformity with adopted Wiltshire Council affordable housing policy;

c. addressing local issues of affordability and demand for affordable homes for first time buyers and local households on below average incomes, including providing First Homes housing through developer contribution at up to a 40% discount of the open market value (where it is commercially viable to do so);

d. at Melksham and Bowerhill, prioritising the delivery of a balanced mix of two, three and four bedroom dwellings, which should include bungalows;

e. at Shaw and Whitley, increasing the proportion of two and three bedroom dwellings, to address a shortfall in their availability; and,

f. meeting the needs of an increasing local population of older people and those living with disabilities. Housing that meets part M4(2) of the Building Regulations, Category 2: accessible and adaptable dwellings will be supported. Proposals for age restricted housing and extra-care communities will be supported only in the most sustainable locations where they are closely linked to local services and public transport.

The reason for the policy

4.7.1 The Wiltshire Core Strategy (and emerging Local Plan) Policy 1 (Settlement Strategy) classifies and establishes settlement boundaries. 'Settlement boundaries' generally delineate the extent of urban areas typically reflecting what has been built. Development within boundaries is generally supported. Development outside settlement boundaries is more controlled in the interests of balancing social, economic and environmental needs. Wiltshire Council may amend boundaries during the Plan period, as development takes place and allocations are built out on the edge of settlements.

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

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

4.7.4 Melksham Neighbourhood Plan area Housing Needs Assessment[18] has provided updated independent evidence of the specific needs for market and affordable housing at Melksham and at Shaw and Whitley.

Settlement Boundaries

A settlement boundary is a line that is drawn on a plan around a town or village, which reflects its built area. In general, there is a presumption in favour of development within the settlement boundary. Wiltshire Council updated the settlement boundaries in 2020 as part the Housing Site Allocations Plan. Any land and buildings outside of the boundary line are usually considered to be open countryside where development would be regulated with stricter planning policies.

Wiltshire Core Strategy Policies 1 and 15 define the settlements of the Plan area as:
Market Towns: Melksham and Bowerhill village (click for map)
Large Villages: Shaw and Whitley (click for map)
Small Villages: Beanacre and Berryfield (no settlement boundaries)

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

18. Melksham Housing Needs Assessment, Aecom 2023 for the JMNP2

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

4.7.7 The Housing Needs Assessment suggested that at Melksham, future housing delivery should focus on the delivery of 2-bedroom, 3-bedroom, 4-bedroom dwellings, but at Shaw and Whitley the emphasis should be to provide smaller homes to re-balance the opportunities. This mix may require some adjustment for the sub-areas based on the existing dwelling mixes and populations in these areas, which may include 1-bed homes.

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

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

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

4.7.10 It's important to note that affordable housing requirements may vary on a site-by-site basis, taking into account updated evidence of need, or local factors including the viability and cost of delivering development. Abnormal costs such as demolition, ground remediation etc. will impact on the number of affordable homes.

First Homes

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

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

Allocations of Land for Housing

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

Background and reason for the allocation policies

4.8.1 Site allocations:

At Melksham and Bowerhill

- 7.1 - Land at Cooper Tires
- 7.2 - Land at the Former Melksham Library, Lowbourne House and Car Park
- 7.3 - Land South of Western Way, Bowerhill

At Whitley

- 7.4 - Land at Whitley Farm, Whitley
- 7.5 - Land at Middle Farm, Whitley

4.8.2 As set out earlier in this Plan, sites allocated for housing through Neighbourhood Plans contribute towards meeting housing requirements and local needs, as well as delivering a sustainable approach to plan-led development with the overall objective being to secure the best possible outcomes from development for our communities.

Site Assessment and Selection

4.8.3 Combining the information on available sites from the Wiltshire Council Strategic Housing and Economic Land Availability Assessment (SHELAA) and responses to a local "call for sites" undertaken by JMNP2 created a long-list of 109 potential site options. These were independently assessed[19] by consultant AECOM employing a robust, logical two stage methodology based on the Government's National Planning Practice Guidance (PPG) and the Locality Site Assessment Toolkit. This produced a list of 35 brownfield and greenfield sites at Melksham, Shaw and Whitley, Beanacre and Berryfield that they considered 'potentially suitable and feasible' for possible allocation in the JMNP2.

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

19. *Site Options and Assessment Report, Aecom 2023 for the JMNP2*

Finding the right sites for the JMNP2

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

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

Every available site was subject to an initial independent assessment of suitability and deliverability to produce a short-list of sites potentially worthy of further consideration. Sites have also been reviewed to consider how well they can achieve the JMNP objectives and meet community needs.

The local community, stakeholders and site promoters have considered the principle of JMNP sites allocation and proposed sites through initial informal and two formal stages of pre-submission consultation.

Melksham Brownfield Site Allocations (Policies 7.1 and 7.2)

4.8.5 Wiltshire Council, together with Melksham Town Council and Melksham Without Parish Council, have agreed a collaborative approach to coordinate Local Plan strategic allocation of greenfield sites with the sustainable brownfield-led approach to site allocations in the town by JMNP2.

4.8.6 Community engagement undertaken to shape the Melksham Town Centre Masterplan Report[20] identified strong support for the regeneration of both the Cooper Tires site and the former library site. Assessment of greenfield and brownfield-led site allocation options through Strategic Environmental Assessment of the potential allocations confirmed that JMNP2 brownfield sites represent the most sustainable and deliverable approach. NPPF Paragraph 124(c) states policy should "...give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated ...land".

20. *Melksham Town Centre Masterplan Report, Aecom 2023 for the JMNP2*

4.8.7 Both sites are available and capable of contributing to meeting the JMNP2 housing allocation requirement, although each present significant challenges to deliverability. Owners of both sites have provided evidence to support the feasibility of regeneration and confirmed active progress towards implementation of site development within the JMNP2 period.

Land South of Western Way, Bowerhill (Policy 7.3)

4.8.8 In December 2023, outline planning permission was granted on appeal[21] for the development of 210 dwellings and a 70 bed care home (equivalent to 38 dwellings) on land south of Western Way. The initial Regulation 14 pre-submission draft of JMNP2 did not propose allocation of the site, which was instead proposed as a Green Wedge between Melksham and Bowerhill as part of Policy 19 in JMNP2. The planning consent, however, has established the principle and amount of residential development and has removed the ability of JMNP2 to designate the land as a Green Wedge. JMNP2 must address these impacts. This allocation policy 7.3 (Land South of Western Way) adopts a positive approach to these new circumstances. It takes account of consented housing numbers, coordinates the site development with the future surrounding context and establishes policy criteria that will help secure JMNP2 objectives through the detailed design and housing mix.

21. *Appeal Ref: APP/Y3940/W/23/3324031*

Allocations at Shaw and Whitley (Policy 7.4 and Policy 7.5)

4.8.9 At Shaw and Whitley, JMNP2 is continuing to take the lead in planning for local housing needs and allocates approximately 55 dwellings (15 fewer than the emerging Local Plan housing requirement). This approach takes account of locally valued landscapes and the distinctiveness of Shaw and Whitley.

4.8.10 The small range of available sites assessed as potentially suitable, taken together with the priority to protect the rural separation between Shaw and Whitley, led to the consideration of more constrained sites that present the potential to efficiently meet the housing requirement and deliver smaller homes including at least 16 Affordable Homes, which are needed and have not been delivered sufficiently within the villages.

4.8.11 The allocation policies follow on the next pages.

Land at Cooper Tires Factory Site

continued overleaf

Policy 7.1: Land at Cooper Tires Factory Site

Land at the former Cooper Tires main factory site, as defined in figure 6, is allocated for development of a mixed use scheme which will optimise the effective use of the site, including:

a. approximately 100 dwellings in the part of the overall site which is within Flood Zone 1 (and to include affordable housing subject to commercial viability) within the Plan period. Further housing will be supported in principle in **the context of a comprehensive masterplan for the site which addresses key policies and constraints, including flood risk;**

b. other uses, including employment, community, leisure, retail and cultural uses where they contribute to creating a sustainable neighbourhood, are consistent with other adopted policies, scheme viability and the delivery strategy;

c. new accessible walking and wheeling routes, including riverside public realm; and

d. flood mitigation infrastructure.

A single comprehensive masterplan, phasing and delivery strategy for the development should be prepared, and approved by the local planning authority, as part of, or in advance of any planning application being submitted for the whole or part of the allocated site. Detailed planning applications should be in accordance with the approved masterplan. The masterplan and planning proposals should be prepared in the context of this Plan, the Wiltshire Local Plan and national planning policy, and with early pre-application consultation with the local community. The masterplan should define the appropriate mix of uses on the site.

Development proposals for the site will:

<u>Heritage</u>

1. Be supported by a heritage assessment of the on-site and neighbouring buildings and the impact of proposed development.

2. Protect and enhance heritage assets and their setting; Avon House (listed Grade II) and the former factory canteen (local non-designated heritage asset) and adjacent heritage assets; Town Bridge (Grade II) and Unicorn Public House (Grade II) in conformity with JMNP2 Policy 21.

3. Investigate the presence and significance of archaeological remains in line with an initial desk based archaeological assessment.

<u>Landscape, Green and Blue Infrastructure and Biodiversity</u>

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

secure the protection of existing and enhanced landscape features, priority species and ecology within the site and River Avon environment.

5. Provide a scheme of site landscape, green and blue infrastructure and communal outdoor space that protects existing trees, contributes positively to resident health and wellbeing and increases on-site tree canopy cover in accordance with JMNP2 Policy 17.

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

Design

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

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

9. Provide a high standard of residential amenity and wellbeing by achieving design principles contained within recognised design guidance including "Buildings for a Healthy Life" (Homes England), or any subsequent revision'.

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

Flood Risk

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

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

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

Access and Movement

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

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

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

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

continued overleaf

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

Wilts & Berks Canal Link Project

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

Infrastructure

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

- **Early years, primary and secondary education**
- **Healthcare capacity to meet the needs created by the development.**
- **Measures to positively support walking and wheeling in Melksham including links between the site, Melksham Railway Station and town centre and neighbouring facilities and communities.**

The level of contribution sought will be considered in the context of site viability and other relevant considerations, including deliverability.

The reason for the policy

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

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

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

4.8.15 Wiltshire Core Strategy existing employment site Core Policy 35 does not identify Cooper Tires as a Principal Employment Site, but enables managed diversification of existing employment land. Wiltshire Core Strategy Core Policy 36 supports regeneration opportunities and aims to maximise the re-use of previously developed land and neighbourhood plans facilitating economic regeneration and the preparation of masterplans for specific sites. The Wiltshire Employment Land Review (updated 2023) concluded the site

does not meet modern requirements well and has potential for development with a mix of uses, although residential uses were not included.

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

4.8.17 JMNP2 engagement has demonstrated that allocation of the site for regeneration is well supported by the community and owners and is supported by Wiltshire Council. However, the site is not directly addressed by Wiltshire Council's emerging Local Plan and in response to community wishes, national planning guidance and a need to enable re-use of the vacant site, JMNP2 has adopted a proactive and positive approach to planning for the future of the site through its allocation in the Neighbourhood Plan.

4.8.18 Owners of the site have made it available for allocation within the JMNP period (2020-38). They have confirmed site availability, provided a suite of assessment evidence and maintained support for allocation. In addition, representations have stated the support and intentions of a new owner to progress master planning and applications for the redevelopment of the site.

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

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

4.8.21 In recognition of the site size, complexity and significant flood risk and contamination constraints, the JMNP2 has adopted an evidence-led and realistic approach to its allocation. This is based upon significant engagement with Wiltshire Council and site owners, analysis of site constraints, capacity and viability issues, and the review of recent and similar local case studies, including the emerging Local Plan allocation of Innox Mills at Trowbridge.

4.8.22 Whilst the independent assessment of the site considered it potentially suitable for allocation as sustainably located, previously developed and under-used land, analysis and evidence gathered by JMNP2 and provided by site owners identified that it is significantly constrained by flood risk (zones 2 and 3) and contamination. This restricts land readily available for residential development to about 25% of the site and increases remediation costs that severely challenge the viable regeneration of the site.

4.8.23 Development of the site must address site-wide flood issues and mitigation measures, de-contamination and infrastructure provision. It is therefore vital that development is in accordance with a comprehensive master plan and delivery strategy, approved by Wiltshire Council, which address allocation policy requirements.

4.8.24 It is recognised that regeneration is likely to commence later in the plan period and extend beyond 2038. Initial residential-led phases, generating value on less constrained parts of the site are considered feasible and viable for delivery by 2038. The allocation therefore sets proportionate expectation for development of approximately 100 dwellings on land within Flood Zone 1 up to 2038, but it supports further residential development where this enables delivery of viable mixed use regeneration on the site.

4.8.25 As in other brownfield regeneration allocations promoted through the emerging Wiltshire Local Plan, the allocation supports a potential to reduce the amount of affordable housing provision to achieve a viable allocation.

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

Figure 6: Cooper Tires Site. The hatched area illustrates the anticipated developable area for housing taking into account Flood Zone 3. (approximate area / not to scale)



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Land at the Former Melksham Library Site

Policy 7.2: Land at the Former Melksham Library Site

Land at the former Melksham Library, Lowbourne House and adjacent public car park shown in figure 7 is allocated for development of approximately 50 specialist dwellings for older people including affordable housing (Class C3) or to purchase through shared ownership via a registered social provider.

Development proposals for the site should:

<u>Heritage</u>

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

2. Protect and enhance the setting of adjacent listed buildings and the character of Melksham Conservation Area.

3. Investigate the presence and significance of archaeological remains and avoid areas of high value remains where preservation in situ is to be required.

<u>Landscape, Green and Blue Infrastructure and Biodiversity</u>

4. Be informed by arboriculture, landscape and ecology surveys and an approved management and construction management plan to secure the protection of existing and enhanced landscape features, priority species and ecology within the site.

5. Provide a scheme of site landscape, green and blue infrastructure and communal outdoor space that protects existing trees, contributes positively to resident health and wellbeing and increases on-site tree canopy cover in accordance with JMNP2 Policy 17.

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

<u>Design</u>

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

8. Protect the amenity of neighbouring uses and residents of Union Street.

9. Provide a high standard of residential amenity and wellbeing by achieving design principles contained within recognised design guidance for specialist housing for older people such as "Design Principles for Extra Care Housing" (Housing Learning and Improvement Network, 2020).

continued overleaf

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

Flood Risk

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

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

13. Include a flood emergency plan, where considered necessary to ensure the safety of residents, staff and visitors in the event of flooding.

Access and Movement

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

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

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

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

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

Infrastructure

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

- Healthcare capacity to meet the needs created by the development.
- Measures to positively support walking and wheeling in Melksham town centre.
- Town centre public car parking improvements as identified in the Melksham Parking Study (AECOM 2024) to mitigate the loss of public parking within the allocation site.

Land at the Former Melksham Library Site

The reason for the policy

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

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

4.8.29 The site is within Melksham Conservation Area. However, the remaining building, Lowbourne House, is not listed or identified as a non-designated heritage asset. Mature trees which line the eastern boundary of the car park site contribute to the character of the conservation area and are protected.

Figure 7: Library Site (approximate area / not to scale)



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

4.8.31 Outside the site, parts of Lowbourne are subject to flood risk from Clackers Brook. This may have an impact on access to the site. A strategy for emergency access in the event of flooding will be required to safeguard more vulnerable residents.

4.8.32 The site has been made available by the owner for allocation to support the development of extra care apartments for older people. Wiltshire Council intend to manage the development as Affordable Housing.

4.8.33 The Melksham Housing Needs Assessment identifies there is a need for housing to meet the needs of the proportion of older people living within the community. The proportion of people over the age of 75 is predicted to rise from 8.8% to 14.7% by 2038.

4.8.34 As with Cooper Tires, redevelopment of this site regenerates a vacant site of previously developed land and contributes to improving town centre vitality.

4.8.35 Specialist Housing for older people should be within purpose designed buildings. Allocation parameters require these to be provided to a high standard of accommodation meeting use specific design guidance whilst protecting amenity and character.

4.8.36 An independent viability assessment undertaken to support the allocation has suggested the housing should be a mix of open market and affordable housing units. Whilst the owners (Wiltshire Council) aim to provide a 100% affordable scheme, this allocation will provide the flexibility to support a deliverable scheme.

Land South of Western Way, Bowerhill

Policy 7.3: Land South of Western Way Bowerhill

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

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

Any detailed application being submitted for the whole or part of the site must be in accordance with the approved parameters plans for development of the site.

Development of the site will:

<u>Landscape, Green and Blue Infrastructure and Biodiversity</u>

1. Be informed by arboriculture, landscape and ecology surveys and an approved management and construction management plan to secure the protection of existing and enhanced landscape features, priority species and ecology within and adjacent to the site.

2. Provide a scheme of site landscape, green and blue infrastructure and communal outdoor space that protects existing trees, contributes positively to resident health and wellbeing in accordance with JMNP2 Policies 12, 14, 17 and 18.

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

<u>Design</u>

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

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

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

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

continued overleaf

Flood Risk

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

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

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

Access and Movement

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

12. Provide a secondary emergency highway access.

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

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

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

16. Contribute towards provision of public transport and enhancement of facilities within less than 5 minutes easy walk of all residents and contributions to provide a viable service.

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

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

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

Infrastructure

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

- **Early years education where appropriate.**
- **On or off-site healthcare capacity to meet the needs created by the development.**
- **Measures to positively support walking, wheeling and public transport use between the site, Melksham town centre and Melksham railway station and linking into existing networks.**

Land South of Western Way, Bowerhill

The reason for the policy

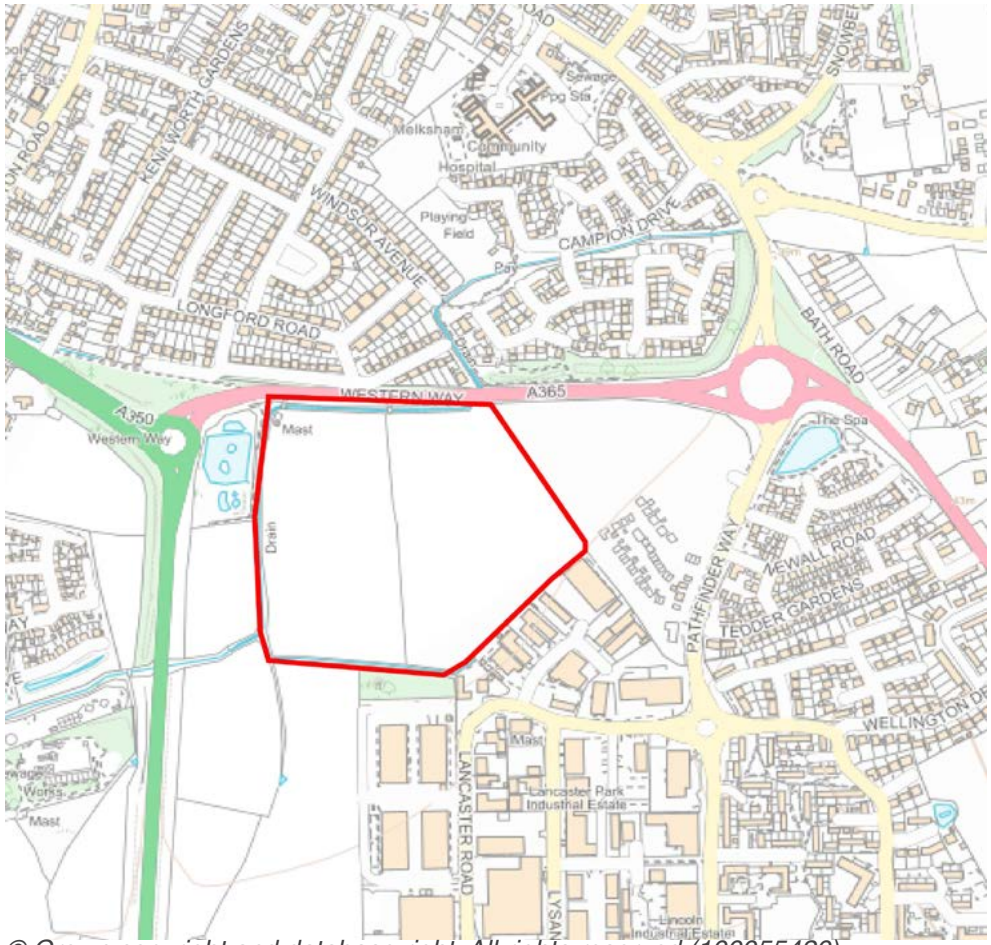
4.8.37 The 10.25 hectare greenfield site located to the south of Melksham, north-west of Bowerhill and east of Berryfield has been made available for allocation by JMNP2. In late 2023 outline planning permission granted on appeal established the principle for development of 210 dwellings and a 70 bed care home, with vehicle access from Maitland Place and broad landscape, layout and density parameters. Further "reserved matters" planning consents will be required to establish the precise layout, housing mix and design of the development.

4.8.38 The allocation addresses these new circumstances to ensure the development of the site is both best managed to protect the amenity of neighbouring residents and employers, and also secure optimum benefits for the community.

4.8.39 The proposed allocation of the site therefore seeks to:

- Regularise the consented housing development within JMNP2 to account for the 210 homes it enables;
- Plan positively to influence and set the layout, design and mix of future detailed housing proposals to meet local needs and expectations.

Figure 8:Land South of Western Way (approximate area/not to scale)



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Land at Whitley Farm, Whitley

Policy 7.4: Land at Whitley Farm, Whitley

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

a. redevelopment of redundant modern agricultural buildings and barns; and,
b. conservation and re-use of the Grade II listed Whitley Farm barn.

Conservation-led development of the site will:

<u>Heritage</u>

1. Be informed by a robust scheme specific heritage assessment which justifies any proposed change of use, and the extent, scale and design of the redevelopment and any conversion of the listed barn, having regard to the impact on the heritage assets at the site.

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

3. Investigate the presence and significance of archaeological remains and avoids high value archaeological remains where preservation in situ is to be required.

<u>Landscape, Green and Blue Infrastructure and Biodiversity</u>

4. Be informed by arboriculture, landscape and ecology surveys and an approved management and construction management plan to secure the protection of existing and enhanced landscape features, priority species and ecology within the site and South Brook environment,

5. Provide a scheme of site landscape, green and blue infrastructure and communal outdoor space that protects existing trees, enhances the rural setting, and contributes positively to resident health and wellbeing. On-site tree canopy cover should be increased in accordance with JMNP2 Policy 17.

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

<u>Design</u>

7. Be of a sensitive high-quality design, appearance and materials that responds appropriately to the listed farm setting informed by The National Farmstead Assessment Framework (Historic England) and in conformity with JMNP2 Policy 20 and demonstrating a positive response to the Melksham Design Guide and Codes (2023) and Wiltshire Design Guide (2024).

8. Safeguards the amenities of neighbouring residents.

continued overleaf

9. With regard to any residential development which may be proposed, provide a high standard of residential amenity and wellbeing by achieving design principles contained within recognised design guidance including "Buildings for a Healthy Life" (Homes England).

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

Flood Risk

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

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

13. Off-site works on land within the landowner's control to improve flood management within Whitley.

Access and Movement

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

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

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

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

Infrastructure

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

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

Land at Whitley Farm, Whitley

The reason for the policy

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

4.8.41 The site owners have stated that changes in farming operations within its estate have resulted in Whitley Farm, and its buildings (and structures), becoming obsolete in some cases and under-used in terms of a working farm. Where sufficient evidence is provided to establish that the farm is redundant, conservation-led regeneration will be supported.

4.8.42 Where the farm is redundant, removal of the modern farmyard structures and limited development of the farmyard part of the site could protect and enhance the setting of the listed buildings and improve the character of First Lane and the village's rural setting. The appropriate adaptive reuse of the disused barn

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



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can also help bring this heritage asset into new productive use to sustain its fabric.

4.8.43 Wiltshire Council require any proposed change of use and development of the site to be supported by an allocation in JMNP2 and, in accordance with Wiltshire Core Strategy Core Policy 58 (Ensuring the Conservation of the Historic Environment) that any following scheme proposal is to be informed by a robust heritage assessment that ensures the significance of the heritage assets and their settings is understood, and will be appropriately enhanced in development proposals.

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

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

4.8.46 The allocation of the whole Whitley Farm site does not seek to identify or preclude the potential future extent, form or use of the site, but provides clarity and support to enable proposals to conserve and regenerate the site, its historic buildings and its rural setting.

Land at Middle Farm, Corsham Road, Whitley

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

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

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

Development proposals for the site will:

<u>Heritage</u>

1. Be informed by a proportionate heritage assessment approved by Wiltshire Council.

2. Protect the setting of neighbouring listed buildings, Whitley House and barn (Grade II), in conformity with JMNP2 Policy 21.

3. Investigate the presence and significance of archaeological remains and avoid high value remains where preservation in situ is to be required.

<u>Landscape, Green and Blue Infrastructure and Biodiversity</u>

4. Be informed by arboriculture, landscape and ecology surveys and an approved management and construction management plan to secure the protection of existing and enhanced landscape features, priority species and ecology within the site.

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

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

<u>Design</u>

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

continued overleaf

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

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

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

Flood Risk

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

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

Access and Movement

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

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

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

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

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

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

Infrastructure

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

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

Land at Middle Farm, Corsham Road, Whitley

The reason for the policy

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

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

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

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

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



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

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

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

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

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

Infrastructure Phasing and Priorities

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

Policy 8: Infrastructure Phasing and Priorities

Development proposals for housing development should consider, assess, and address their necessary infrastructure requirements and, insofar as they relate to matters within the applicant's control, schedule any related programmes of work in co-ordination with the housing development to deliver infrastructure in a timely fashion.

The reason for the policy

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

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

4.8.57 Financial contributions are required as appropriate from developers for the associated infrastructure cost implications of that development. In Wiltshire this includes Community Infrastructure Levy (CIL) contributions and S106 contributions from legal agreements on development. The Local Planning Authority is required to produce annual infrastructure funding statements to set out how much money has been raised through developer contributions (CIL and S106) and how it has been spent[22].

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

22. The priorities for CIL spending by Wiltshire Council set out priorities for CIL funding across Wiltshire and in the Melksham area

Shopping, Working and Getting Around



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

Policies in this section:

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

Town Centre

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

Policy 9: Town Centre

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

a. **proposals are in conformity with the adopted Wiltshire Development Plan having regard to the NPPF (Chapter 7) and the Town and Country Planning (Use Classes) Order. Development proposals within and at the edge of the defined town centre area should demonstrate how they will make a proportionate and positive contribution to achieving the priority aims of the Melksham Town Centre master plan Report 2023;**
b. **the proposal is in keeping with the scale and character of the centre of this Market Town and, where appropriate, preserves or enhances the Conservation Area;**
c. **access to public transport, walking and cycle routes and car parking is considered and addressed;**
d. **where appropriate, a positive contribution is made to conserving and enhancing the appearance and quality of town centre frontages;**
e. **development proposals at edge of centre locations and locations inter-connected with the defined town centre area (see figure 10) will, additional to criteria a-d, be required to evidence that there are no suitable and viable sites or buildings within the defined town centre area;**
f. **planning applications for development or change of use of ground floor frontages within the defined town centre primary shopping area (see figure 10) retain or enhance the continuity of active ground floor shop front uses; and,**
g. **where relevant, productive use is made of upper floors of town centre premises, including for offices, small businesses and residential use with independent access, where they sustain or enhance the vitality of the host building use and Melksham town centre. Development proposals for Main Town Centre Uses outside of the defined town centre will be required to demonstrate that there are no suitable and viable sites or buildings within the defined town centre.**

The reason for the policy

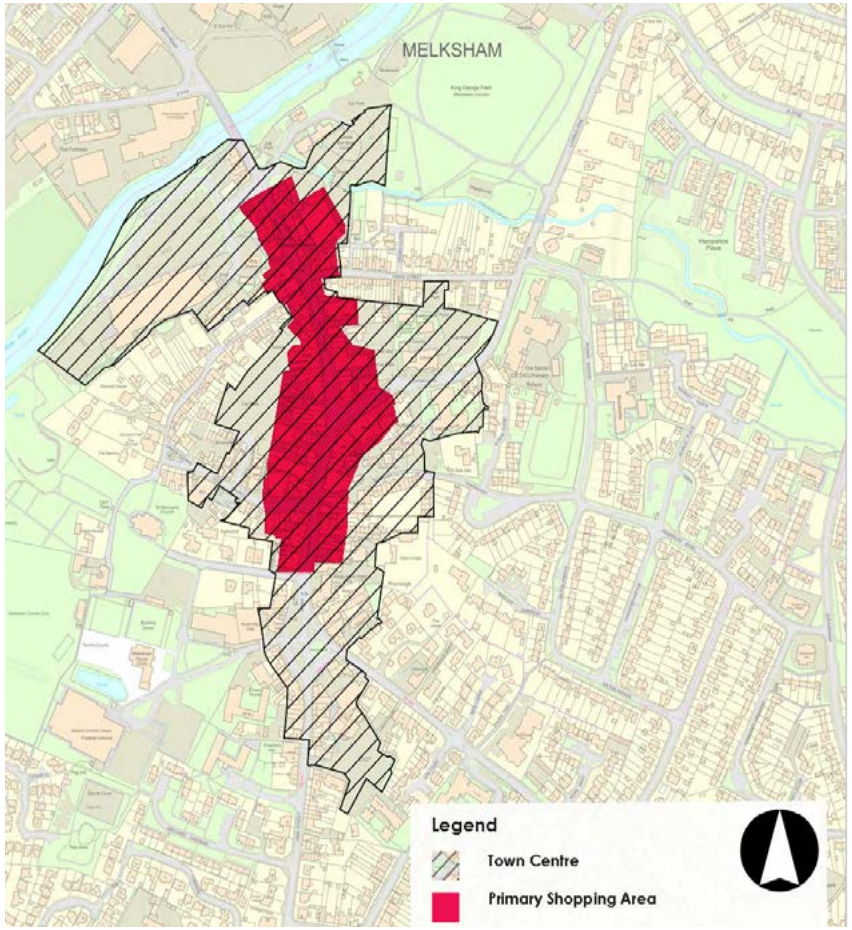
4.9.1 In the rapidly changing national and local context for high streets and market towns, we want to enable our town to change and evolve in response to challenges, changes and opportunities. Most recently, the increase of home-working could provide a boost to local high streets, which means many high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

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

4.9.3 The NPPF requires Local Plans to define a hierarchy of town centres, their boundaries and a Primary Shopping Area; the focus of main town centre uses. Emerging Local Plan Policy 67 (Managing Town Centres) responds to updates of the NPPF, defining Melksham a transitional market town centre and retaining "sequential testing" requirements of out of centre retail proposals.

4.9.4 There are around 155 businesses operating in the town centre and a good number of shops comprising a mix of independent traders, supermarkets and national retail brands.

Figure 10: Town Centre



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

4.9.6 The Melksham Town 2020 – 2036 Scoping Report[23] 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, and there has been improvement to the area in front of the Town Hall, no other recent improvement works have taken place.

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

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

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

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

23. Melksham Town 2020 – 2036 Scoping Report, Melksham Town Council 2019 (link takes you to the Melksham Town Council website)



Melksham High Street

Employment Sites

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

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

Policy 10: Employment Sites

Proposals for the retention, intensification and reuse of previously developed employment land will be supported, particularly where they provide space for start-up and small businesses and introduce a range of new employment opportunities.

Except where sites are allocated for alternative uses by this Plan, development proposals should generate the same number, or more, permanent full time equivalent jobs as the existing or former use wherever this approach is practicable.

The reason for the policy

4.10.1 The Wiltshire Employment Land and Workspace Review (updated 2023) notes that the two largest employment sectors in the Melksham Community Area are manufacturing and wholesale/ retail. The employment profile of the Neighbourhood Plan area has moved in recent years from an industrial economy, dominated by several large international employers, to a mixture of industrial, service and retail businesses.

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

4.10.3 Wiltshire Core Strategy Core Policy 35 (Existing Employment Sites) defines Principal Employment Land and seeks to retain these and other employment land within similar employment levels.

4.10.4 Through Wiltshire Core Strategy Core Policy 34 (Additional employment land), Wiltshire Council sets out support for proposals

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

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

4.10.6 The creation of use class E and MA has affected the delivery of Wiltshire Core Strategy Core Policies 34 and 35. The emerging Local Plan seeks to reinforce and increase employment land at Melksham in conformity with new legislation and the NPPF. Emerging Local Plan Policy 65 (existing Employment Land) seeks ongoing retention of employment land at Bowerhill, south of Berryfield, adjacent to Melksham Station and Avonside Enterprise Park. But it enables the potential for some sites to change use. This may include consideration of new uses at the Cooper Tires site.

4.10.7 Emerging Local Plan Policy 64 (Additional Employment Land) sets out the updated employment land strategy to balance employment and economic growth. It proposes 5 hectares of new employment land within the strategic allocation on land east of Melksham. Policy 64 is also supportive of employment development on unallocated sites adjacent to Melksham as a Market Town where they are appropriate to the role and function of the settlement and certain criteria are met.

4.10.8 Emerging Local Plan Policy 68 (Managing Town Centres) supports neighbourhood plans in producing local strategies and appropriate site allocations within and on the edge of town centres that would support the viability of the town centre. Neighbourhood plan proposed allocations at Cooper Tires and the former library site, together with the Town Centre Master Plan Report, seek to address the delivery of this policy and enable new employment opportunities. Policy 10 seeks to address these various matters and recycle brownfield land for employment development. It advises that proposals should generate the same number, or more, permanent full time equivalent jobs as the existing or former use wherever this approach is practicable. Nevertheless, the Plan recognises that a flexible approach will be necessary on this matter throughout the Plan period. This acknowledges that proposals for high-value employment uses with different employment levels than the former uses may make an equal or greater contribution to the well-being of the neighbourhood area.

Sustainable Transport and Active Travel

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

...and objective10: Encouraging journeys by rail and bus together with improving cycle and walking routes to reduce the need to travel by car.

Policy 11: Sustainable Transport and Active Travel

As appropriate to their scale, nature and location, development proposals should complement the Sustainable Transport Hierarchy, including provision for ultra-low emission vehicles. Proposals for major development should demonstrate through a proportionate Travel Plan how sustainable transport modes are maximised and that safe and suitable movement can be achieved for all people.

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

The reason for the policy

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

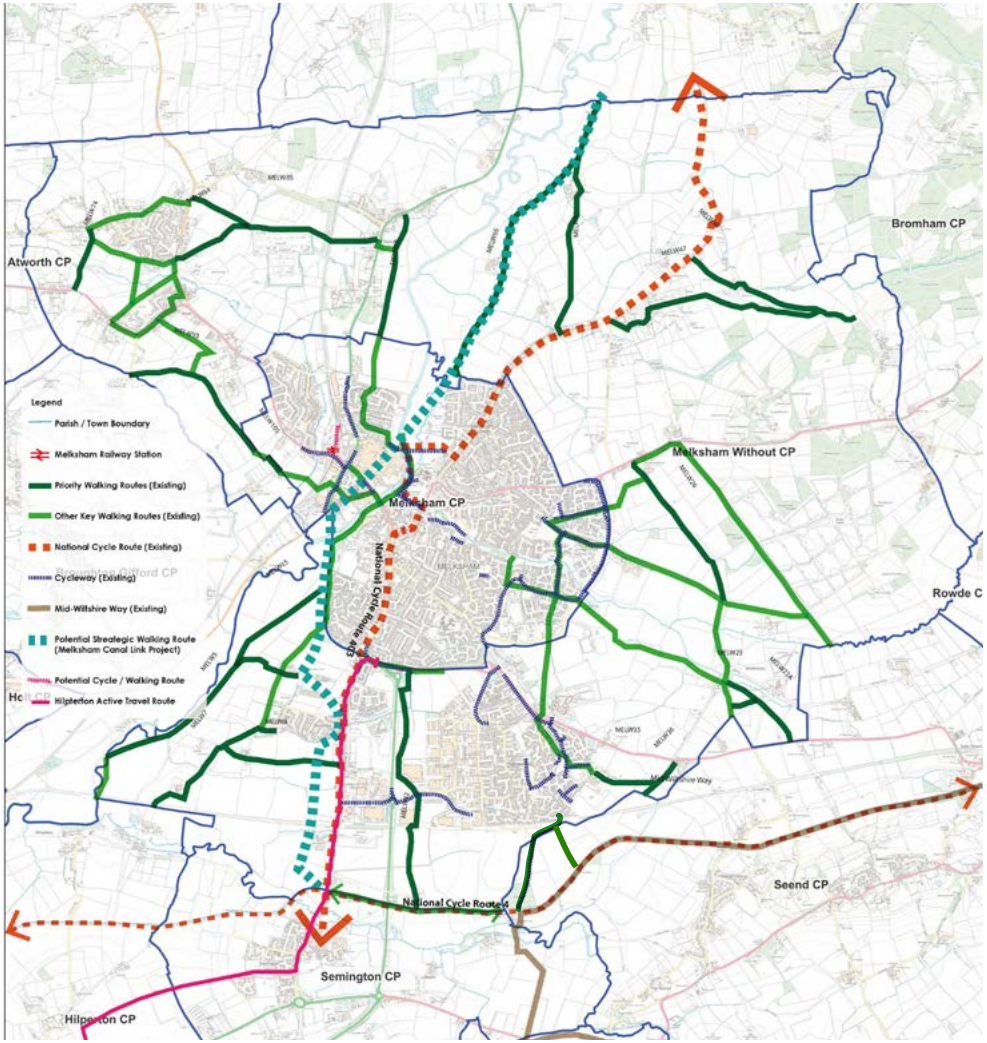
4.11.2 Increased levels of walking and cycling were seen across the UK during the pandemic. In May 2020 a £2 billion package to increase cycling and walking was introduced by the government[24].

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

- coherence
- directness
- safety
- comfort
- attractiveness

24. *The details of the delivery of this fund are set out by the Department for Transport in a document titiled Gear Change July 2020*

Figure 11: Key Routes for Walking and Wheeling



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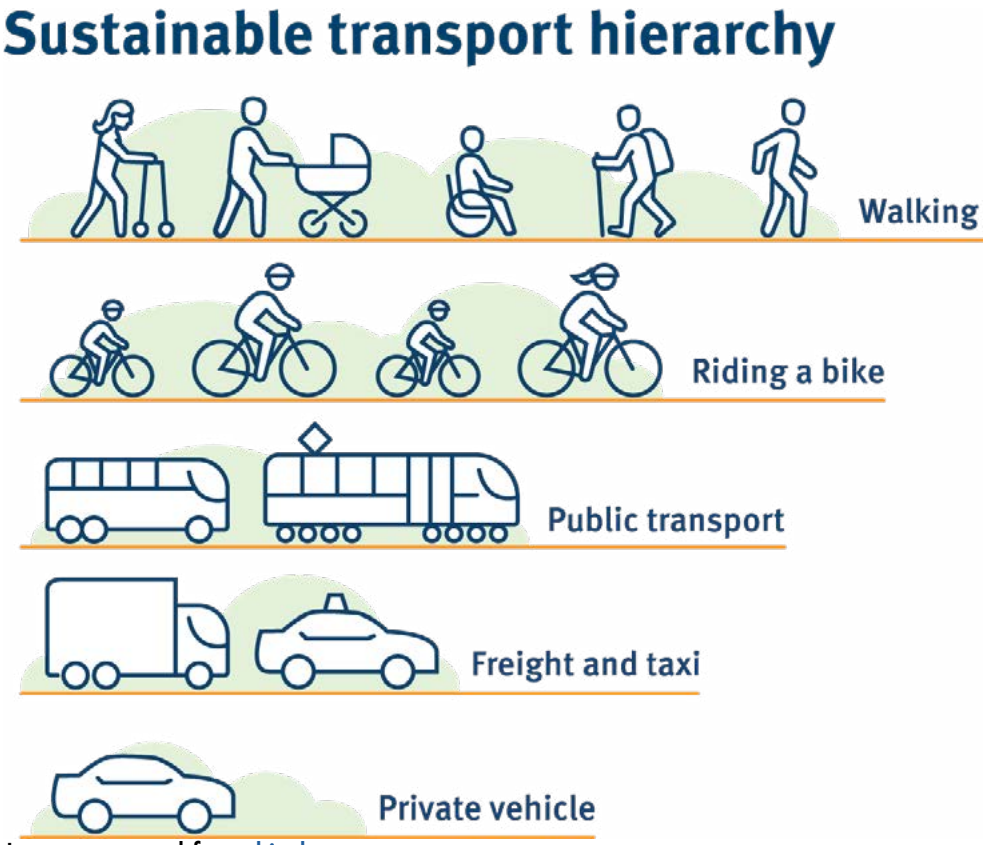


Image sourced from kindpng.com

Public Transport

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

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

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

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

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

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

- a station café and toilet have been provided by conversion of existing buildings, and although currently closed, are key requirements to encourage train usage.
- Active train service information displays have been provided.
- Sufficient car parking and electric car charging for the next few years.

Continued on next page

Further enhancements are planned/desirable summarised as:

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

The Melksham Transport User Group and other related organisations have put forward proposals for improvements to bus services in the Plan area. Key to these are:

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


Electric Bus Trial





Community Well-being and Nature



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

Policies in this section:

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

Green and Blue Infrastructure

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

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

Policy 12: Green and Blue Infrastructure

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

2. As appropriate to their scale, nature and location, development proposals for major developments must:

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

The reason for the policy

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

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

4.12.3 A diagrammatic representation of GBI assets and their connectivity potential is shown in figure 12 as identified in the GBI Evidence Base Report[25]. The report identifies local elements of GBI with the aim of linking local sites and delivering connectivity of assets between and within different parts of the Plan area.

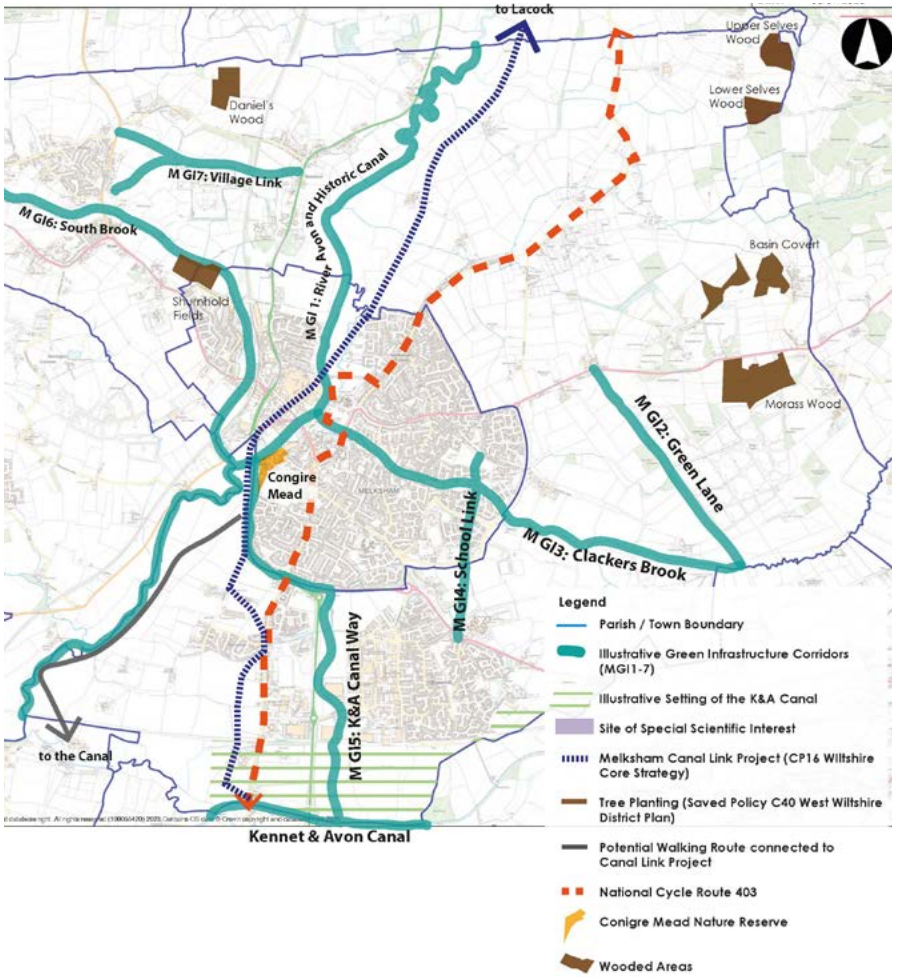
4.12.4 The GBI network has many and varied benefits for the environment, biodiversity and residents; it can contribute to the health and wellbeing of communities and local wildlife, and is an important part of our distinct local identity and part of what makes Melksham a good place to live.

25. Available on the JMNP2 webpages.

4.12.5 Since the first edition of the JMNP, Wiltshire Council's Green and Blue Infrastructure (GBI) Strategy was adopted in 2022 and provides an overarching strategy for up to 2030 to support the natural environment and the benefits it brings to our wildlife, communities and businesses. The Strategy sets out three overarching GBI goals: 1. Adaptation, mitigation and resilience to climate change; 2. Halting the loss of and improving biodiversity; 3. Contributing to health and wellbeing. The Strategy commits to the preparation of Settlement Frameworks in areas where future growth is expected, to support delivery of local projects. This Neighbourhood Plan will provide a basis from which to shape the Settlement Framework for our area.

4.12.6 The role of GBI is clearly a vital part of a proactive approach to mitigating and adapting to climate change, the Parish and Town Councils therefore encourage developers to seek to achieve a Building with Nature accreditation[26]. Building with Nature is a new framework of standards for delivering GI. It is divided into three core themes: wellbeing, water and wildlife. The aim is to enable the delivery of high quality green infrastructure at each stage of the development process, from planning and design, through to long-term management and maintenance.

Figure 12: Diagrammatic Illustration of the Potential for Green and Blue Infrastructure (Source: Neighbourhood Plan Green Infrastructure Report)



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26. www.buildingwithnature.org.uk

Melksham Canal Link Project

A key priority for the Plan area GBI is the Melksham Link Project. The Wiltshire Core Strategy safeguards the route of the Melksham Link Canal in Core Policy 16. This policy safeguards the identified route (see Figure 12) for developing a canal link to the south west of the town between the Kennet & Avon Canal and the River Avon, and to the north east of the town between the River Avon and the historic alignment of the Wilts & Berks Canal.

The project is an opportunity to improve the GBI network both within the Plan area and the wider Melksham Community Area, with associated benefits such as increased walking and cycling routes and linked to this is the opportunity to promote tourism within the town, and to generate renewable energy, harnessing energy from the river.

In 2012, a planning application for the Melksham Link was submitted, but this has not yet been determined, due to outstanding environmental concerns raised by the Environment Agency.

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

The project is being co-ordinated by the Wilts & Berks Canal Trust in collaboration with funders who envisage how the canal will be delivered. The Town and Parish Councils would wish any associated development to be appropriate and in accordance with the vision and policies of this Plan.

Biodiversity

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

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

Policy 13: Biodiversity

Development proposals, including those for field based solar farms, should deliver at least a 10% improvement in biodiversity value within and, where appropriate, beyond the site to deliver tangible benefits for biodiversity, including specific attention for protected species. Proposals which deliver a higher Biodiversity Net Gain will be particularly supported.

Where appropriate, development proposals should demonstrate sensitive responses to statutory and non-statutory nature conservation sites (as shown on Figure 13), such as accommodating a buffer zone.

The reason for the policy

4.13.1 The Neighbourhood Plan area is host to a range of wildlife sites and features which support the overall wildlife network and contribute to the well-being of wildlife and residents alike.

4.13.2 A full record of habitats and biodiversity information has been obtained from Wiltshire and Swindon Biological Records Centre, assembled using a mixture of field survey data and aerial photographic interpretation to compile a habitat inventory. This is available in full in the evidence base, and is summarised in the Green Infrastructure Report, which adds Neighbourhood Plan level information to the biodiversity data. The map on the next page shows wildlife sites within the Neighbourhood Plan area. Any development proposed within the 2km Lesser Horseshoe core area in the south eastern part of the neighbourhood area will need to comply with the Conservation of Habitats and Species Regulations 2017, as amended, through compliance with the Bat SAC Planning Guidance for Wiltshire 2015 (or latest iteration). In addition, a project level Habitat Regulations Assessment (HRA) may be required.

4.13.3 Under the Environment Act 2021, all planning permissions granted in England (with a few exemptions) except for small sites, are required to deliver at least 10% Biodiversity Net Gain (BNG).

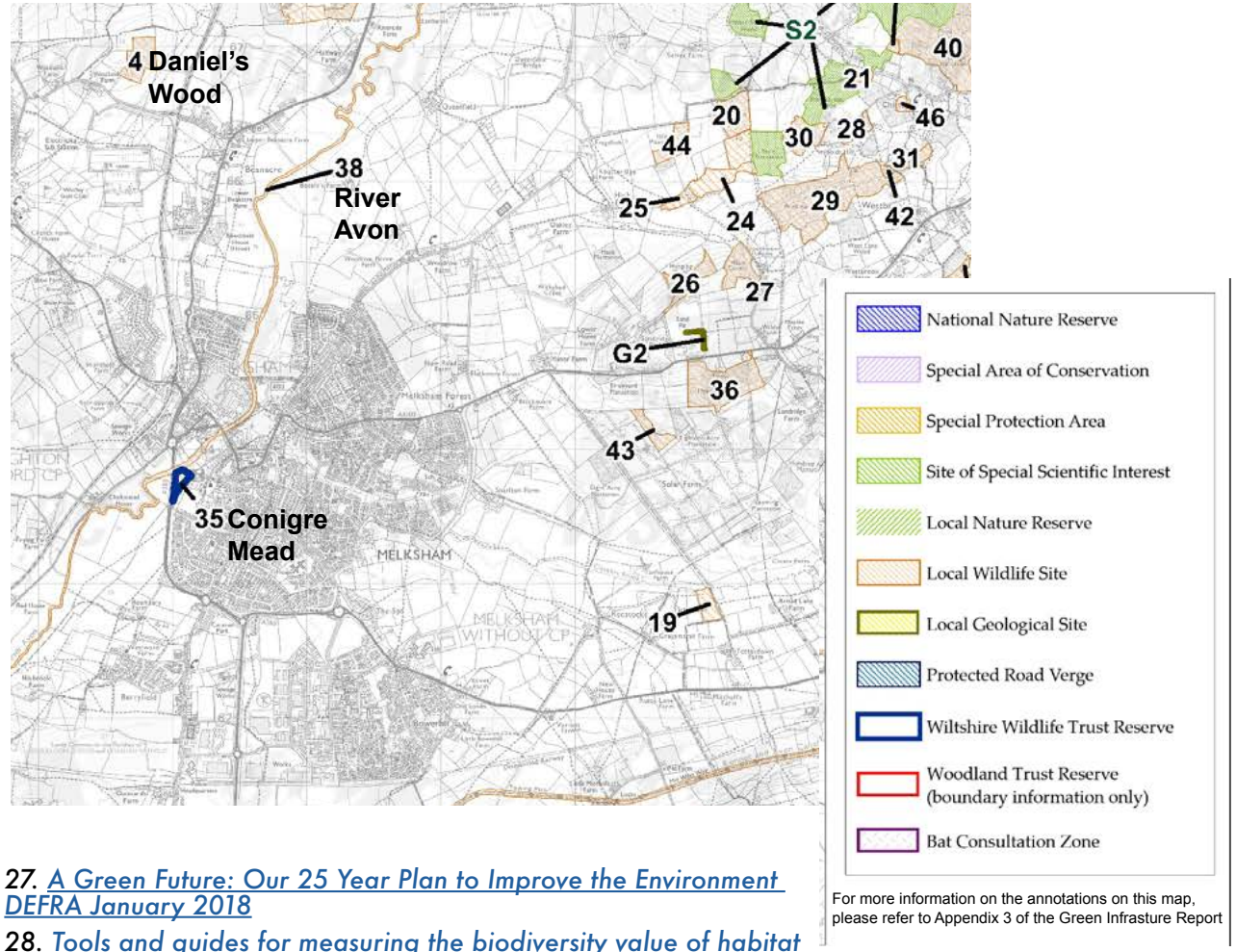
4.13.4 Net gain is an approach that uses the planning process to leave biodiversity in a better state than it was before the development started, securing wider benefits for people and the

Figure 13: Wildlife Sites (Note: the numbered sites on the map, produced by the Wiltshire and Swindon Biological Records Centre can be found listed in appendix 3a of the Green Infrastructure evidence base report available on the website: melkshamneighbourhoodplan.org)

environment, and is directly linked to the Government's aim in its 25 Year Environment Plan[27] to "leave the environment in a better state than we found it".

4.13.5 The Biodiversity Metric 4.0[28], is the current version of the statutory biodiversity metric tool from the Government. Minor applications and small-scale proposals, where applicable, should use the small sites version of the Metric. BNG delivery should also be in accordance with established good practice principles within Biodiversity Net Gain: Good practice principles for development (CIEEM, CIRIA and IEMA) and BS 8683:2021 (and updates). Plainly the biodiversity metric may be updated in the Plan period. For the purposes of Policy 13 the most up-to-date version of the biodiversity metric should be used.

4.13.6 This ambition for improved levels of biodiversity again links to Building with Nature accreditation (see previous policy). In new development we expect to see wildlife features incorporated into the design of new dwellings to increase biodiversity.



27. A Green Future: Our 25 Year Plan to Improve the Environment DEFRA January 2018

28. Tools and guides for measuring the biodiversity value of habitat for biodiversity net gain (BNG) available via this link.

Open Spaces

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

... and objective 13: Protecting, improving and expanding existing services and facilities to promote health, education and social needs.

Policy 14: Open Spaces

Development proposals that involve the whole or partial loss of an existing open space (other than the designated Local Green Spaces) should demonstrate through an assessment of open space provision, using the quantity and access standards for open space as set out by Wiltshire Council, that:

a. there is a surplus in the catchment area of the open space concerned beyond that required to meet both current and forecast need, and full consideration has been given to all functions that the open space performs; or
b. a replacement open space (or an enhancement of the remainder of the existing site) provides a net benefit to the community in terms of the quantity, quality and accessibility of the open space including by walking and wheeling.

The reason for the policy

4.14.1 As the NPPF makes clear, access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change.

4.14.2 A distinctive characteristic of the town is the open spaces which punctuate the built environment, meaning that most residents are within walking distance of some open space. This key positive feature contributes to community well-being. The pandemic has highlighted what the evidence already demonstrated – the closer people live to accessible green space, the happier and healthier people are.

4.14.3 The Green Space Index[29] is Fields in Trust's annual barometer of publicly accessible local park and green space provision. Other than Bowerhill, information from the Green Space Index in 2023 shows that our area does not meet the minimum standards of green space provision, though it also shows that there is generally good standard of access, with many people being within ten minutes walking distance of green spaces across the

29. *Available via the Fields in Trust website*

area including King George V Park, Conigre Mead Nature Area, together with many other parks and recreation grounds and play areas. New green spaces are needed to address this issue, the newest of which is a community field in between Whitley and Shaw, which will be a good addition to the local open space network and overall GBI infrastructure of the wider area.

4.14.4 We also know that populations in our area will grow and this may negatively impact on the quantity of green space available to communities, unless provision is increased. Parks and green spaces are not a statutory service, meaning local councils have no obligation to provide them for their residents (though the provision is taken seriously by the Town and Parish councils).

4.14.5 Therefore we are keen to make sure that open spaces for play and recreation are created and / or invested in alongside housing development.

4.14.6 Financial contributions from developers will therefore be used for local community sports, play or pitch infrastructure and/or strategic priorities within the Wiltshire Playing Pitch Strategy (PPS) which is an evidence base within the local plan. PPS priorities/ options for Melksham are included in the action plan of the strategy, which was updated at the end of 2024. Need for 2 full size 3G Artificial Turf Pitches is identified.

4.14.7 It should also be noted here, that a number of open spaces have been identified as meeting the tests for designation and protection against inappropriate development as Local Green Space (see pages 93-95). Educational open spaces are an example of open space that cannot be designated as a Local Green Spaces, but are covered under this policy.

Community Facilities

This policy also helps meet objective 13: Protecting, improving and expanding existing services and community facilities to promote health, education and social needs.

Policy 15: Community Facilities

1. Development proposals that involve the loss, in whole or part, of a community facility (as identified in Figure 14a, b & c, and detailed in the Community Facilities Report) must demonstrate that:

a. adequate alternative provision exists or will be provided in an equally accessible or more accessible location, including by walking and wheeling, within the catchment area of the facility; or
b. it would not be economically viable, feasible or practicable to retain the building or site for use as a community facility; redevelopment for non-community use will only be considered as a last resort and where all other options have been exhausted.

2. Proposals for new community facilities in the Plan area will be supported where the applicant can demonstrate the need and benefits of the proposed facility, or where replacement or enhanced facilities are proposed as mitigation against the loss of any community facilities within the Plan area.

3. New or replacement community facilities should be located where there is a choice of travel options and should be accessible to all members of the community.

The reason for the policy

4.15.1 Community facilities are defined by Wiltshire Council as those that serve settlements and include health, education and cultural infrastructure including uses such as local shops, meeting places, sports venues, public houses and places of worship.

4.15.2 The community facilities in the Plan area cover both rural and town areas. The existing community facilities in the Plan area as detailed in the Community Facilities Report[30] compiled by the Plan Steering Group are wide-ranging and can include community centres, public houses, cultural centres and venues, places of worship, education establishments and training centres and childcare facilities, health and social care facilities, sport and recreation facilities and civic and administrative facilities. However, the list and maps produced for the

30. *Available on the JMNP2 webpages.*



The old Berryfield Village Hall


The new Berryfield Village hall (opened 2023)


The community opening the new Village Hall

Neighbourhood Plan cannot be said to be exhaustive (there are almost certainly more facilities than those included on the maps).

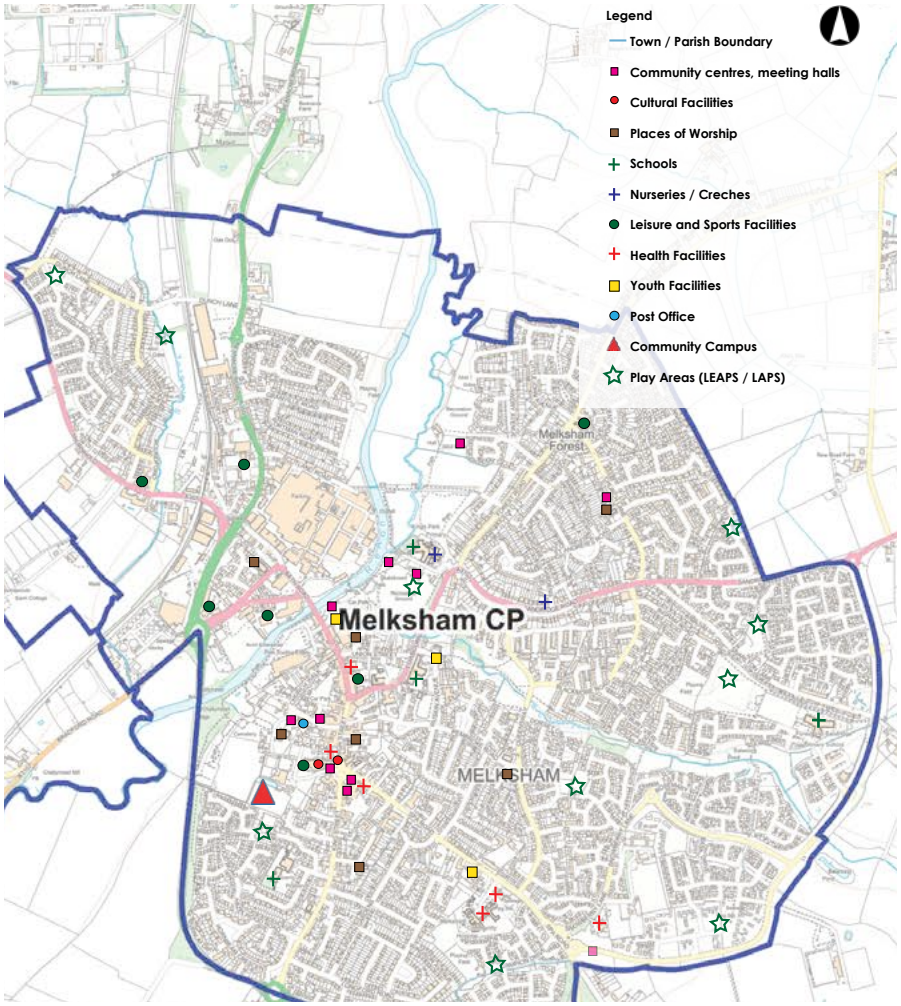
4.15.3 In August 2022 the new Community Campus opened. The Campus is a hub for community services, and provides a new library, swimming pool, sports hall, gym, dance studio and meeting rooms, amongst other facilities.

4.15.4 The primary function of some facilities is commercial (including pubs – a key facility in rural areas) but they also perform a clear role for the community in terms of sport, recreation or leisure provision.

4.15.5 This policy supplements the Local Plan by identifying the key local facilities and services, with the aim of retaining them unless it can be demonstrated that there is no longer a need or where alternative provision is made. In practice there are sometimes permitted development rights that allow changes of use without planning permission. However, this policy applies where planning permission is needed.

4.15.6 Consultation illustrated how important community, health and leisure facilities are for the health and wellbeing of the people of Melksham and its wider community. As mentioned in the supporting text to the previous policy, financial contributions from developers are to be used for local community sports, play or pitch

Figure 14a: Melksham Town Community Facilities
(Source: Neighbourhood Plan Community Facilities Report)



infrastructure and/or strategic priorities within the most up-to-date Wiltshire Playing Pitch Strategy (PPS).

4.15.7 The Community Facilities Evidence Base Report sets out in detail the facilities in the Plan area. It is important that facilities for people of all ages are made available to support a diverse and healthy local population, and that these facilities are accessible to residents, as far as possible using sustainable modes of transport.

4.15.8 Proposals for partnership working with national or local agencies to develop strategic community facilities to meet the identified needs for the people living in and around the Plan area will continue.

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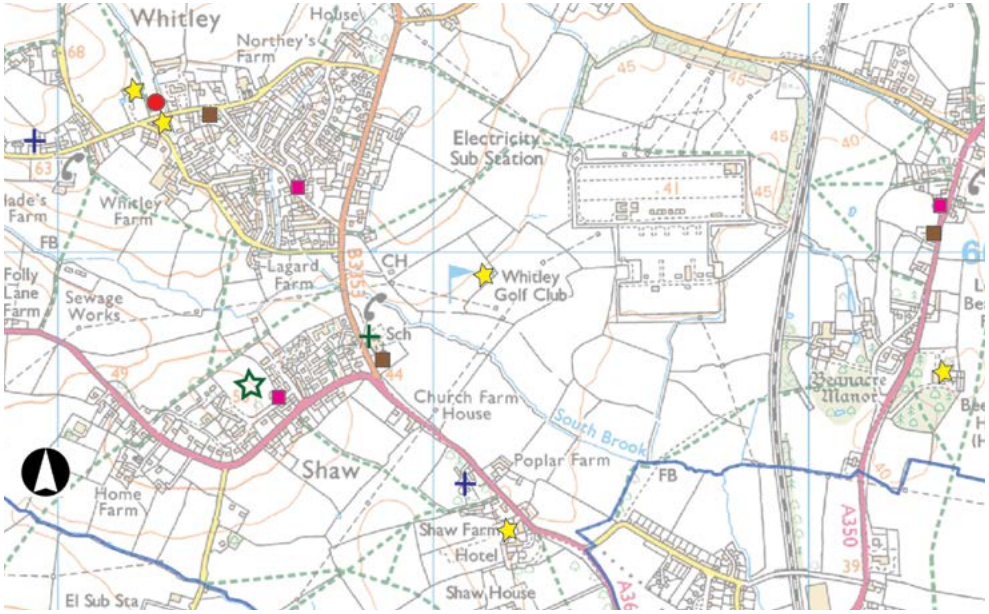


Figure 14b: Whitley, Shaw and Beanacre Community Facilities
(Source: Neighbourhood Plan Community Facilities Report)

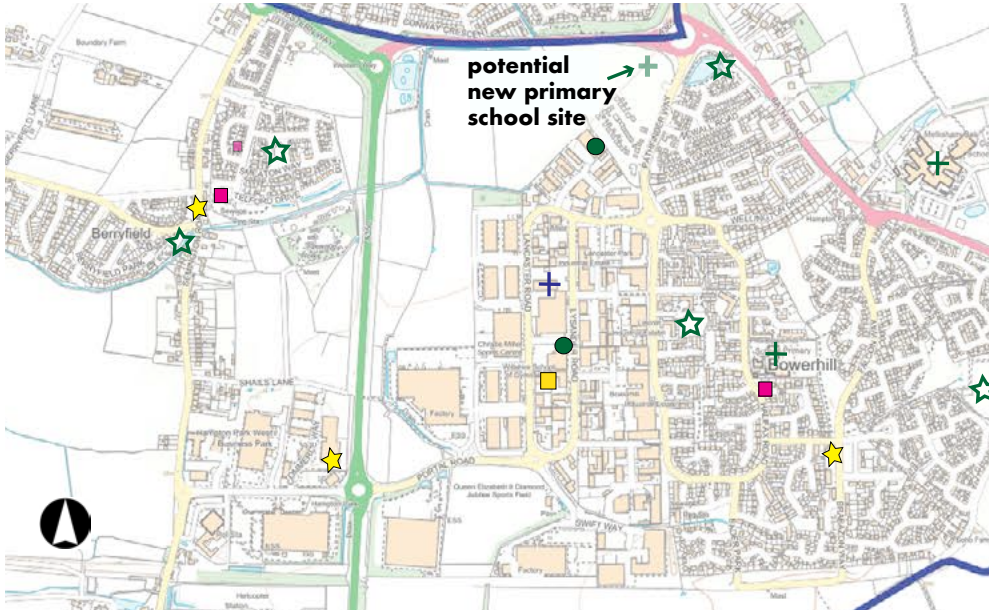


Figure 14c: Bowerhill and Berryfield Community Facilities
(Source: Neighbourhood Plan Community Facilities Report)

Figures 14a, 14b and 14c not to scale, please refer to map on previous page for key and Community Facilities Report which can be found on the Neighbourhood Plan website *for further information. One additional type of facility is noted in the rural areas – pubs denoted by a star* ☆ *Maps can also be found on the JMNP website as individual files.*

Local Green Spaces

This policy also helps meet objective 11: Protecting, connecting and increasing our network of green spaces.

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

Policy 16: Designation of Local Green Spaces

The sites shown on figure 15, and listed on page 95, are designated as Local Green Spaces.

Development proposals within the identified LGSs will only be supported in very special circumstances.

The reason for the policy

4.16.1 The NPPF sets out the context for Local Green Space (LGS) designation which provides strong protection against development for green areas of particular importance to communities. Paragraph 106 of the NPPF sets clear criteria that the designation should only be used where the space is:

a) in reasonably close proximity to the community it serves
b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquility or richness of its wildlife; and
c) where the green area is local in character and is not an extensive tract of land.

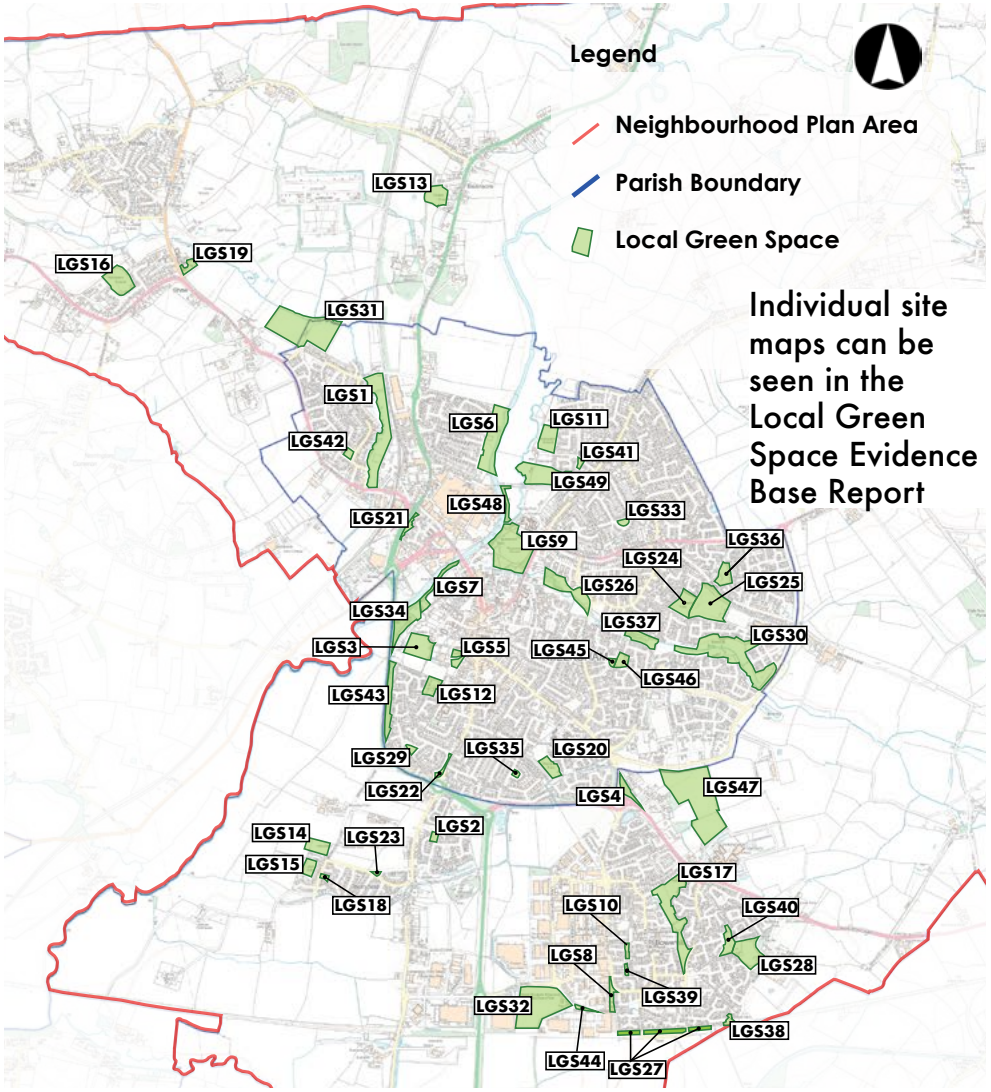
4.16.2 Interactive online community outreach to identify potential LGS nominations was undertaken during May and June 2022. This was supplemented by an opportunity to validate or add nominations at community drop-in events and online consultation during February and March 2023. From around 150 suggestions from the first community consultation, a working group assessed potential sites to determine which sites were considered to meet the criteria. The final proposed set here are informed by both community input and landowner feedback.

4.16.3 In various ways, these spaces provide quality of life benefits to our community, for example through encouraging recreation and providing space for being outside and connecting with nature.

4.16.4 It is recognised that not all development proposals on LGS will be 'inappropriate' and some development that enhances the beneficial use of LGS may be appropriate, such as provision of appropriate facilities. Proposals must set out how any impacts on the special qualities of the green space, as identified by its reason for designation, are protected.

4.16.5 A full explanation of the methodology, evidence and justification to support the designations, along with maps of each LGS can be found in the Local Green Spaces Evidence Base Report which can be found on the Neighbourhood Plan website.

Figure 15: Designated Local Green Spaces



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Local Green Spaces

1. Land along Roundponds following South Brook
2. Bowood View
3. Cricket field to rear of The Campus
4. Copse area in The Spa
5. Approach to Melksham House
6. Riverside Drive Green/Woodland Areas
7. Natural woodland area near Sainsburys
8. Land between Duxford Close and the boundary of the industrial estate
9. King George V Playing Fields and recreation area
10. Beverley Close Greenspace
11. Forest Community Centre playing field/sports pitches
12. Hazelwood Road Play Area (Brunswick Park)
13. St Barnabas Church, Cricket Field
14. Berryfield Allotments North (Briansfield Allotments)
15. Berryfield Allotments South (Berryfield Allotments)
16. Shaw Playing Fields "The Beeches"
17. Rear of Grasmere and Wellington Drive
18. Green in Berryfield Lane
19. Shaw Churchyard
20. Old Sports Pitch / field (to rear of Campion Drive)
21. Weavers Crofts
22. Hornbeam Crescent/Semington Road
23. Berryfield Green triangle
24. Foresters Park Road playing fields
25. Cranesbill Road playing fields
26. Clackers Brook (Queensway)
27. Brabazon Way
28. Hornchurch Road Public Open Space
29. Hornbeam Crescent green
30. East of Melksham (Clackers Brook)
31. Shurnhold Fields
32. Bowerhill Sports Field
33. The Crays
34. Conigre Nature Reserve
35. Sarum Avenue
36. Skylark Green
37. Primrose Nature Reserve
38. Locking Close
39. Beaufort Close to Kestrel Court
40. Harvard Close
41. Awdry Avenue
42. Roundponds
43. Walkway parallel to A350 (rear of Hornbeam Crescent)
44. Verge with stream and trees (Swift Way, Bowerhill)
45. Dorset Crescent play area/green
46. Primrose Drive play area/green
47. Woolmore Farm Fields*
48. Riverside Walk (Melksham Green Space Group)
49. Murray Walk Field (Melksham Green Space Group)

*Note: *previously named* 'Dog Walking Area to the Rear of The Spa' See the Local Green Space Evidence Base Report for detail on all these sites

Natural, Built and Historic Environment



"We have the beautiful River Avon, meandering through the town with its riverside walks, stretching along fields through King George V Park and onto the wildlife reserve at Conigre Mead"

Policies in this section:

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

Trees and Hedgerows

This policy helps meet objective 15: Conserving and enhancing the quality of the natural landscape.

Policy 17: Trees and Hedgerows

1. Ancient and Veteran Trees:

To be supported, development proposals should ensure that there will be no loss or deterioration of the irreplaceable habitats of ancient woodlands (as shown in Figure 16) and ancient or veteran trees found outside ancient woodland, unless the need for and benefits of the development in that location clearly outweigh the loss. A minimum buffer of at least 15 metres in width should be maintained between ancient woodland and any development boundary. A buffer zone around an ancient or veteran tree should be at least 15 times larger than the diameter of the tree.

2. Other Existing Trees and Hedgerows:

To be supported, development proposals should ensure that there is no damage to or loss of trees of good arboricultural and amenity value. Existing trees and hedgerows on development sites should be retained where possible and incorporated as placemaking features in new development. Where there is an unavoidable loss of trees on site, the number and type of replacement trees should be informed by the quality and size of trees lost. Integration of existing hedgerows into private curtilage must be avoided where possible.

3. Increased Tree Canopy:

Wherever practicable, development proposals on sites outside of the town centre, and greater than 0.5 ha in size, should deliver an increase in site tree canopy cover. This should be demonstrated through a tree planting plan, and should be delivered through the retention of existing trees and /or the planting of new trees in public areas and in private gardens. Where this approach is not practicable, other green infrastructure features (such as green roofs) appropriate to the site should be provided.

The reason for the policy

4.17.1 As part of a local response to climate change, place making and achieving local distinctiveness: In Shurnhold Fields, 200 trees planted for WW1 commemoration along with a native rare species orchard, and most recently the community in Shaw and Whitley planted trees. In Melksham town, another intensive residents tree planting scheme was carried out in November 2023. As set out in the Green Infrastructure Evidence Base Report[30], trees are a key asset of the Plan area and there is practical action to increase tree coverage across the community.

4.17.2 Overall tree canopy coverage in the area is estimated to be an average of just over 12% which has been mapped using the i-tree canopy tool[31]. The Urban Forestry and Woodland Advisory Committee Network recommends a minimum standard for tree canopy cover is set for a local area. On this basis, Policy 17 comments that wherever practicable, development proposals on sites outside of the town centre, and greater than 0.5 ha in size, should deliver an increase in site tree canopy cover.[32]

4.17.3 There are a number of areas of ancient woodland across the Plan area, including Daniel's Wood, Morass Wood and Hanging Wood (ancient replanted). This is significant as ancient woodlands now cover just 2.4% of the UK. Standing Advice from Natural England and the Forestry Commission guide planning decisions that relate to ancient and veteran trees.

The Importance of Trees

- Trees naturally absorb CO_2, a key greenhouse gas removing 4 million tonnes of it from the atmosphere every year.
- Local air quality is improved as trees cut the level of airborne particulates and absorb nitrogen dioxide, sulphur dioxide and ozone
- Nearby trees and greenspaces can increase property value of 15 –18%. The larger the trees the greater their proportional value.
- Tree cover across England is 12.8%, of which 10% is woodland.
- The Woodland Trust recommend an increase in UK woodland as part of the way to tackle biodiversity and climate crises.
- Existing tree cover is being mapped as part of the approach to increasing tree cover. Friends of the Earth also advocate that planting more street trees, forests and hedgerows is one of the best solutions to protect our environment and achieve net zero. See their website for an "opportunity map" of areas in England that may be suitable for creating woodlands – this includes areas in Melksham and Melksham Without.

30. Available on the JMNP2 webpages.

31. Doick et al (2017), England's Canopy Cover supported by Forestry Commission England, University of Southampton, Treeconomics and Wycombe District Council

32. https://www.forestresearch.gov.uk/research/i-tree-eco/uk-urban-canopy-cover/

4.17.4 Both greenfield and previously developed sites are likely to contain trees and hedgerows that, if retained, can make a positive contribution to the character of new development. Retaining key trees can influence both the design and layout of the development, and arrangements for their protection should be made during the construction phase

4.17.6 Hedgerows, like trees, can make an important contribution to the character and can also be important historically as indications of land use and previous ownership. They also contribute significantly to biodiversity and amenity value of the natural and, in places, built environment.

Below: Bristol Tree Replacement Standard (BTRS) Methodology

Trunk Diameter of Tree lost to development (cm measured at 1.5 metres above ground level)	Number of Replacement Trees
Less than 15	0 - 1
15 - 19.9	1
20 - 29.9	2
30 - 39.9	3
40 - 49.9	4
50 - 59.9	5
60 - 69.9	6
70 - 79.9	7
80 +	8

4.17.6 Where tree loss is unavoidable, the Bristol Tree Replacement Standard can be used to inform the number of replacement trees based on the size of the lost tree. Whilst a particular site or design approach to trees will inform the number and approach to tree planting, the Standard is a established methodology used by Bristol City Council[33] and has also been successfully integrated in Neighbourhood Plans with Cam Parish and Chippenham Neighbourhood Plan.

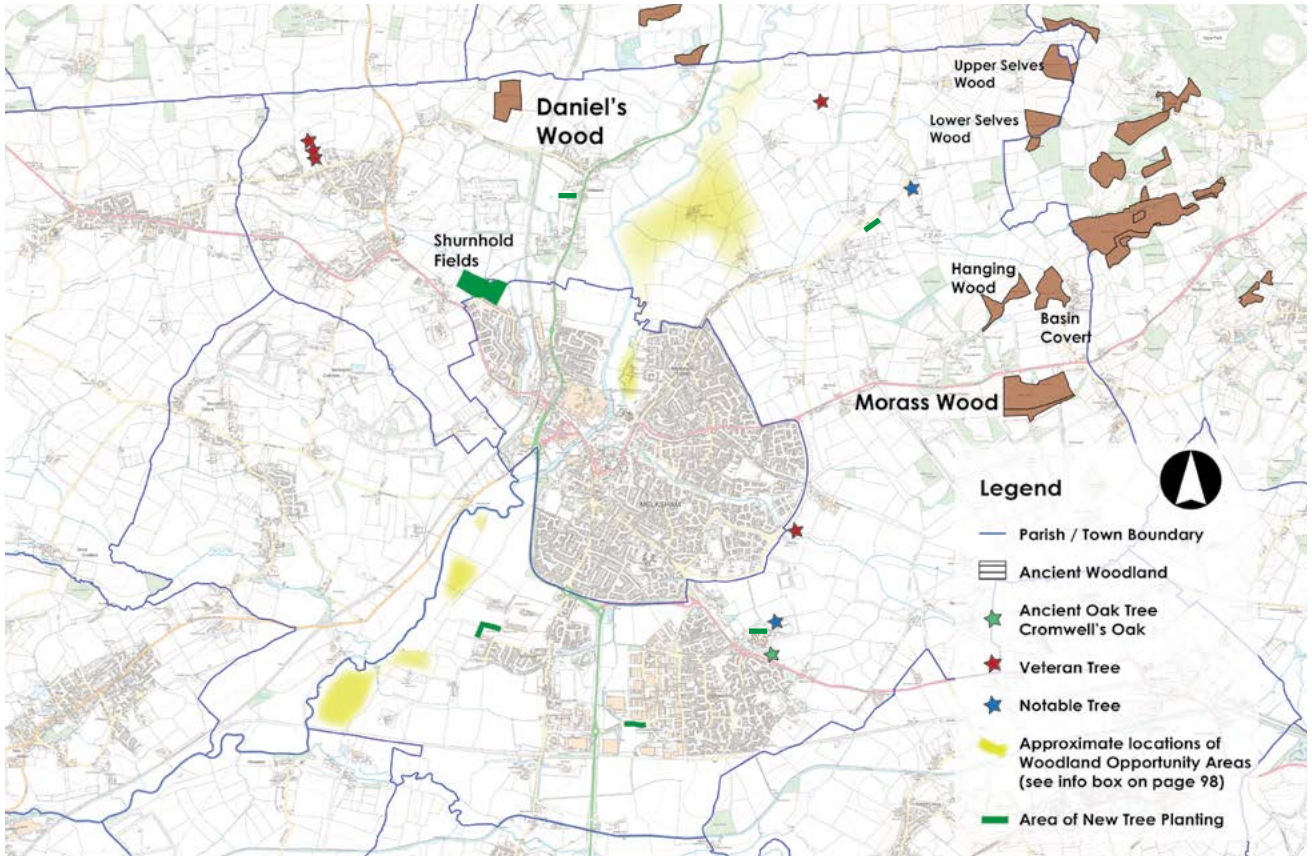


Cromwell's Oak – a culturally important ancient tree in the Plan area

33. *More detail can be found in the Bristol City Council Planning Obligations SPD*

Figure 16: Ancient Trees, Ancient Woodland and Areas of New Tree Planting (Source: Neighbourhood Plan Green Infrastructure Report)

Please note - this map is a snapshot in time. The Woodland Trust maintain a live online map that serves as an inventory of the oldest and most important trees in the UK. This should be referred to for the most up-to-date information on ancient, veteran and notable trees. Website can be accessed here.



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Landscape Character

This policy helps meet meet objective 14: Protecting settlements' rural setting and countryside gaps across the plan area **and objective 15:** Conserving and enhancing the quality of the natural landscape.

Policy 18: Landscape Character

As appropriate to their scale, nature, and location, development proposals will be expected to:

a. integrate natural features such as trees, hedgerows and the local river systems that contribute to both the landscape character and setting of the development;
b. demonstrate that the whole scheme, including hard landscape and planting proposals, draws on local landscape characteristics and features through reference to relevant existing landscape and historic landscape assessments, supplemented by any additional site specific assessments; and,
c. respond sensitively to the settlement setting and transition between their edges and countryside and maintain the separate identity of settlements; and,
d. conserve or enhance the character, openness, tranquillity and amenity of the open countryside.

The reason for the policy

4.18.1 The local landscape is the backdrop to our daily life, and reflects the relationship between people and place. Retaining and enhancing the character and appearance of the landscape in Melksham is recognised as hugely important as the town continues to grow and develop – in particular at the edges between the built and natural environment.


Bridge across the River Avon

4.18.2 The landscape within the Plan area is diverse in character ranging from areas of flat and low lying land with a general sense of openness, to areas that are much more enclosed with lines of trees along the River Avon. As the land rises to the north east there is an area that was once designated in the West Wiltshire Local Plan as a 'Special Landscape Area'. This designation is currently saved by the Wiltshire Core Strategy, but is not proposed to be retained in the emerging Local Plan.

4.18.3 Key characteristics of the landscape of the Plan area are detailed in the Green Infrastructure Report[34] and the Local Landscape Character Evidence Base Report[35] which supplements Landscape Character Assessment work done by Wiltshire Council with local detail. Some key points are:

- The landscape around the River Avon forms a wedge of landscape into Melksham town running in between areas of housing (Riverside Drive to the west and Forest to the east) and from the south as far as the town bridge taking in the Conigre Mead nature reserve from where it spreads out again into the Melksham Without Parish towards the edges of Berryfield.
- Houses from Methuen Avenue, in the Forest area, on the east of this character area, and houses from Riverside Drive on the west, front out onto accessible greenspace (allotments from Methuen Avenue), providing an active frontage and connection to the landscape of the River Avon.
- Brooks and stream corridors are scattered across the landscape, for example Clackers Brook which, like the River Avon, forms a key area of natural green space and landscape, also making a link and connection with the built environment of the town. South Brook to the north west, meanders through agricultural fields between the two villages of Shaw and Whitley, contributing to the separate identity and character of the two villages and to local amenity, with a number of footpaths criss-crossing the area.

4.18.4 Elements of Historic Landscape Character (tangible elements of past land-use that influence the present-day landscape) have also influenced the sense of place and identity of the present-day town and surrounding rural areas and should be drawn on within major planning proposals.

4.18.5 A number of views across the landscape have been included in the Landscape Character Report to illustrate the different characteristics and features across the Plan area. From many places expansive views of the wide open landscape can be appreciated.

34. *Available on the JMNP2 evidence webpages.*
35. *Available on the JMNP2 evidence webpages.*

Separation of Settlements

This policy helps meet objective 14: Protecting settlements' rural setting and countryside gaps across the Plan area.

Policy 19: Separation of Settlements

1. Development proposals should respect the separation between the following settlements:

- **Whitley and Shaw;**
- **Shaw and Melksham;**
- **Beanacre and Melksham; and**
- **Berryfield and Semington.**

2. Proposals for development between the settlements listed above should:

a. be in conformity with development plan policies;

b. demonstrate that they would deliver economic, community and/or environmental benefits which would outweigh any harm to the role and function of the area between the two settlements (individually or cumulatively) as set out in section 1 of this policy, and as detailed in the Green Gap and Wedge Study (2023);

c. minimise and mitigate their urbanising effects, such as artificial lighting and traffic movements; and

d. where practicable, retain trees and hedgerows and, as appropriate to their scale and nature, incorporate additional screening trees and hedgerows as edge features to minimise the impact of development on the separation of the settlements concerned.

Development proposals which would result in the loss of, or an unacceptable reduction of the contribution which it makes to the separation of the settlements concerned will not be supported.

The reason for the policy

4.19.1 When places merge together that were once separate it is known as 'coalescence'. Green wedges (or buffers) have been successfully used in local and neighbourhood plans to prevent the coalescence of villages/towns, and to protect local character and identity. Green wedges are also of multi-functional benefit as spaces for flood protection, climate change mitigation, agriculture, biodiversity and recreation etc.

4.19.2 In recent years, extensive new housing development has been approved across the Neighbourhood Area. Some of this development has had the effect of increasing the perceived or actual coalescence between formerly free-standing settlements, each with their own history, character, and identity. Such development was in some cases permitted contrary to relevant policy in the Wiltshire Core Strategy because the Council was unable to demonstrate a five-year supply of deliverable housing sites, meaning the Wiltshire Core Strategy Core Policies carried less weight, in line with the presumption in favour of sustainable development in NPPF.

4.19.3 Wiltshire Council, through the Strategic Housing and Economic Land Availability Assessment (SHELAA) provides information on a range of potential housing sites and sites for other uses, which gives an indication of how development requirements could potentially be met on the ground. The SHELAA and a separate Call for Sites carried out by the Steering Group of the Neighbourhood Plan to inform this update of the Plan, clearly indicate that land continues to be promoted for development in locations where coalescence could result if development were consented.

4.19.4 As more development is accommodated in the neighbourhood area, the identification of areas of countryside outside settlement boundaries as areas of separation can help prevent (further) erosion of local character and identity arising from 'coalescence' or the merging together of places that were once separate. However, the need to balance appropriate sustainable land uses on the edge of settlements over the Plan

Q What is the SHELAA?

The Strategic Housing and Economic Land Availability Assessment (SHELAA) provides information on a range of potential housing sites and sites for other uses, which gives an indication of how Wiltshire's development requirements could potentially be met on the ground. The SHELAA is required by national policy.

period is acknowledged. For example, the emerging Local Plan allows for new community facilities (Policy 81) and employment development (Policy 64) adjacent to settlement boundaries where certain criteria are met. In the neighbourhood area, the need to balance any development (along with the benefits it will provide) on the settlement edge, with the issue of ensuring the ongoing separation of settlements, should be balanced by decision makers.

4.19.5 A Green Gap and Wedge Study[36] undertaken as part of the evidence base to JMNP2, sets out landscape evidence to illustrate that Shaw, Whitley, Beanacre, Bowerhill, Berryfield and Melksham town each retain a unique character, history and sense of place derived from their landscape settings as recognisably distinct built-up areas, distinguishable from other neighbouring settlements by intervening countryside.

4.19.6 The Green Gap and Wedge Study illustrates that the areas between the settlements identified in Policy 19 have been assessed as meeting three separate criteria and found to provide physical and perceptual separation between settlements in the neighbourhood area.

4.19.7 An addendum[37] to the Study has also been prepared with an update to information about a possible Green Wedge (Berryfield, Bowerhill and Melksham), that no longer fulfils designation criteria due to outline planning permission being granted at appeal, and amendment to another (Melksham and Berryfield), also as result of outline planning permission being granted at appeal. Following the examination of the Plan, the Melksham and Berryfield area is no longer identified in the policy.

4.19.8 The separation between Berryfield and Semington satisfies criteria 1 and 2 of the Green Gap and Green Wedge Study, albeit that it extends outside of the Plan boundary. The southern extent of the separation between the two settlements follows a clear landscape feature of high sensitivity – the Kennet and Avon Canal, which is also the parish boundary between Melksham Without and Semington. The policy applies only in the neighbourhood area, rather than the village of Semington. This acknowledges that a neighbourhood plan can only include land within the designated neighbourhood area.

4.19.9 The Kennet and Avon Canal is an important landscape and physical feature of both Melksham Without and Semington Parish. Co-ordinated work between the Semington Neighbourhood Plan, and this Plan has taken place given the overlapping nature of some of the two sets of policies.

36. Green Gap & Wedge Study, 2023, Aecom/Iceni Projects for JMNP2 available on the JMNP2 evidence webpages

37. Available on the JMNP2 evidence webpages.

Locally Distinctive, High Quality Design

This policy helps meet objective 16: Ensuring that new development is sympathetic to our built heritage and the character of the area, with high standards of design.

Policy 20: Locally Distinctive, High Quality Design

Development proposals should contribute positively to the conservation, enhancement and extension of the quality and local distinctiveness of the neighbourhood area.

In addition to having regard to the National Design Guidance and the Wiltshire Design Guide, development proposals must demonstrate how they have been informed by the adopted Melksham Design Guidelines and Codes, therefore how they have responded positively to the history and character of the area in which the site is located.

Proposals for major development should demonstrate through a Design and Access Statement how the proposed development layout, density, access proposals and building design approach complement and extend the positive characteristics of Melksham and Melksham Without's settlements and landscape, both historic and topographic.

The reason for the policy

4.20.1 The character and quality of Melksham's environment is defined by its heritage, landscape and green and blue infrastructure and accessibility, as much as by the design of its buildings.

4.20.2 This policy addresses matters of development layout, form, materials and detailing. Design proposals should address all other Neighbourhood Plan policies, in particular those relating to Sustainable Design (Policy 1), GBI (Policy 12), Landscape (Policy 17) and Local Heritage (Policy 21) to achieve a responsive and successful proposal.

4.20.3 Melksham Town Council and Melksham Without Parish Council recognise the importance of design quality to local distinctiveness and quality of life. In addition to expecting development proposals to respond positively to national design guidance and be in conformity with the adopted Wiltshire Local Plan Design Policies and Guidance (the Wiltshire Design Guide Supplementary Planning Document was formally adopted by Wiltshire Council on 25th March 2024), the Neighbourhood Plan aims to ensure development in the Plan area is designed to

complement and strengthen local quality of place, character and distinctiveness.

4.20.4 The second Neighbourhood Plan is therefore now supported by the Melksham Design Guidelines and Codes Document[38]. Those proposing or assessing any development should use this resource to inform the design of schemes or assessment feedback. Figure 18 illustrates the different character areas found in the Plan area, and detailed in the Document.

4.20.5 Part 12 of NPPF sets out the importance of achieving well-designed places. It also sets out the role of communities in achieving 'good design':"Design policies should be developed with local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area's defining characteristics".

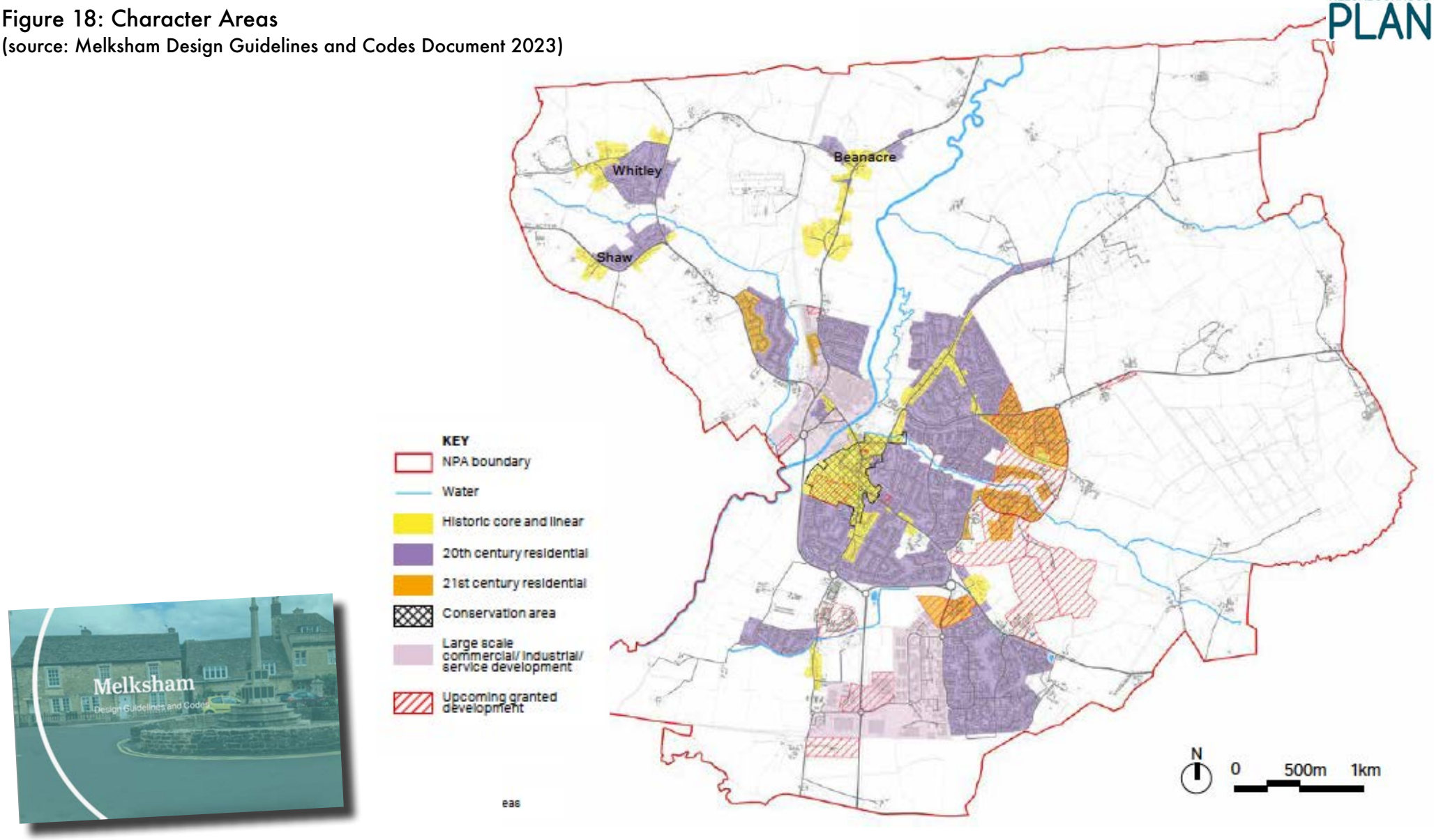
4.20.6 In 2019 the Government published a 'National Design Guide' which highlights the importance of understanding and responding to local character (in many senses). Figure 18 illustrates the 10 components of good design as set out in the National Design Guide. The importance of design is also underscored by the summer of 2020 update of Building for Life 12, an industry standard for well-designed homes and neighbourhoods: Building for a Healthy Life (BHL).



Figure 17: 10 components of good design (MHCLG 2019)

38. Melksham Design Guidelines and Codes, 2023, *Aecom for JMNP2*

Figure 18: Character Areas
(source: Melksham Design Guidelines and Codes Document 2023)



Local Heritage

This policy helps meet objective 16: Ensuring that new development is sympathetic to our built heritage and the character of the area, with high standards of design.

Policy 21: Local Heritage

Proposals for development within the Melksham Conservation Area must show how they preserve or enhance the setting, characteristics and special qualities that make up the architectural and historic character.

For other assets of local heritage importance, including archaeological importance, and buildings or structures identified as Non-designated Heritage Assets (as set out in the 2023 Locally Valued Non-designated Heritage Asset Report or subsequent updates), mapped on Figure 19 (including notable buildings as shown on Figure 20) development proposals should demonstrate that appropriate consideration has been given to:

a. **the significance of the heritage asset;**
b. **its most distinctive and important features;**
c. **the elements of its setting and immediate surrounds that contribute to its significance, and**
d. **the contribution the asset and its setting makes to the character of the local area (whether in a Conservation Area or not).**
e. **any planning application must not only consider heritage issues but show that they have been fully taken into account via a heritage statement. Archaeological surveys of a particular site may also be required prior to the determination of an application.**

The reason for the policy

4.21.1 There are over 70 listed buildings in the parish, 19 in Whitley, 16 in Shaw and 19 in Beanacre.There are over 150 in the town, the majority of the latter being in the Melksham Town Conservation Area. There is, however, no Conservation Area Assessment or Management Plan to guide and inform conservation, future development and investment. Town Centre masterplanning work has, however, identified important heritage features, including 'noteworthy' buildings – these are historic buildings that contribute to the character of the area.

4.21.2 Outside of the town centre conservation area there are two key areas of heritage importance – The City and The Spa.

4.21.3 The Spa is about 1 mile from the town centre on the A365 Devizes Road. Its name originated from the discovery of saline springs on the Devizes road out of Melksham in 1813. Shortly afterwards the Melksham Spa Company was formed which led to the building of a pump room and a crescent of three pairs of Georgian buildings. These are highly distinctive, Grade II listed buildings.

4.21.4 The area of housing for industrial workers known as 'The City' is likely to date from the 17th Century when the town expanded to the north of the river for the first time. A few buildings

still survive in this area, including a Grade II listed former pub (The Red Lion), and a row of attached cottages built in early 18th century of rubblestone, with a stone slate roof. It is a fragmented area of heritage that survives alongside the Cooper Tires site, recent housing developments and the A350 relief road (that pedestrians and cyclists cross by an underpass).

4.21.5 The Parish of Melksham Without is rich in archaeological remains. The northern parish boundary follows the route of the former Roman road between Mildenhall and Bath, while a small Roman town and substantial Iron Age settlement have been discovered to the north west of Beanacre. Most of the Parish is covered with the remains of prehistoric, Roman and medieval settlements, with earthwork remains from former medieval and post-medieval field systems particularly prominent.

4.21.6 Alongside listed buildings and structures, which are nationally protected historic 'assets', there are also other historic features that contribute to the local character, and the unique history of Melksham and the wider parish. Through the Neighbourhood Plan, locally important heritage assets can be listed in order that the significance of any building or site on the list can be better taken into account in planning applications affecting the building or site or its setting.

4.21.7 Planning protections for non-designated heritage assets are not as strong as those for designated heritage assets, but they are still important. Inclusion on a local heritage list based on sound evidence and criteria delivers a consistent and accountable way of recognising non-designated heritage assets, to the benefit of good planning for the area and of owners, developers and others wishing to understand local context fully.

4.21.8 Community outreach to identify potential non-designated local heritage asset nominations was undertaken during May and June 2022. This was supplemented by an opportunity to validate or add nominations at community drop-in events and online consultation during February and March 2023, together with Steering Group research.

4.21.9 Nominations that were put forward were assessed using Historic England criteria set out in Advice Note 7 Local Heritage Listing: Identifying and Conserving Local Heritage. From time to time additional heritage assets may be identified and the locally Valued Non-designated Heritage Assets list will be updated, in which case Policy 21 will apply to an updated version of the list.

4.21.10 The Historic Environment Record was accessed as part of the evidence base for the plan and has been drawn on in the preparation of this Policy.

Locally Valued Non-Designated Heritage Assets List (see Locally Valued Non-designated Heritage Asset Report for detail)

1. Avon Rubber Company Canteen
2. Whitley Reading Rooms
3. Gospel St John 316 Graveyard
4. The Bear Public House
5. Liberal Club (originally: Melksham Liberal Working Men's Club and Institute)
6. Old HSBC bank building
7. Old Lloyds Bank Building
8. New Hall
9. Kelly's Lamp
10. WW2 Air Raid Shelter
11. 18-26 Bath Road
12. Remains of Well and pump in Market Place
13. High Pavement, Bank Street
14. RAF Melksham
15. Pathfinder Way Public Art
16. RAF Commemorative Stones
17. Old Ex RAF Lamppost
18. Avonside Chimney and distinctive roof-line
19. Parts of former Wilts & Berks Canal
20. Wilts & Berks Canal bridge parapet


1. Avon Rubber Company canteen


8. New Hall

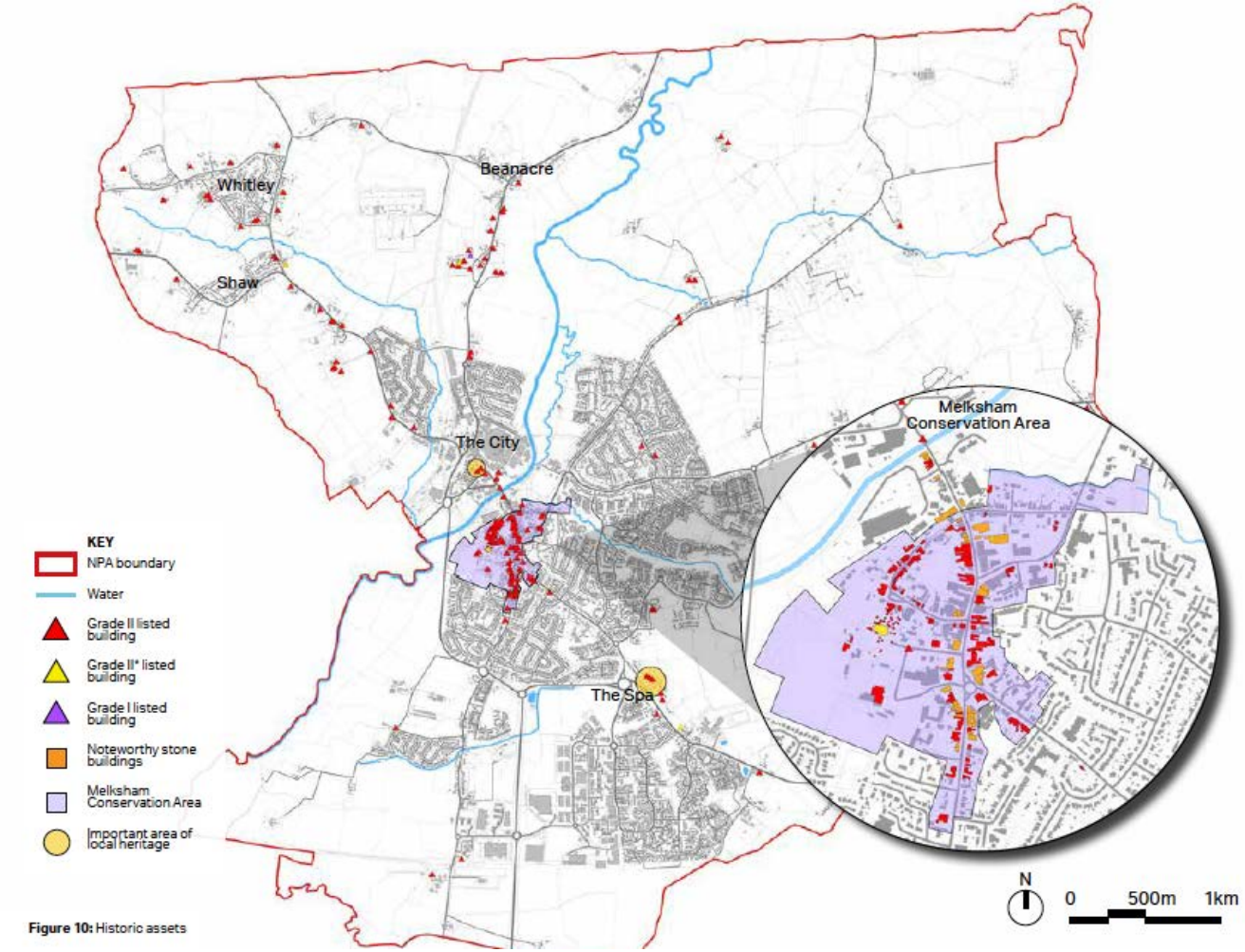

18. Avonside Chimney & roof-line

Figure 19: Locally Valued Non-Designated Heritage Assets



Map credit: Imagery © 2023 Google Maps Airbus, Getmapping plc, infoterra Ltd & Bluesky, Maxar Technologies, Map data 2023

Figure 20: Conservation Area, Listed Buildings, Notable Buildings and Important Areas of Local Heritage
(source: Melksham Design Guidelines and Codes)



5 Priority Statements

Priority statements illustrate the commitment of the two Councils to bring their influence to bear on matters outside the remit and scope of this Neighbourhood Plan either because they are strategic in nature or address issues beyond this Neighbourhood Plan time period. These 'statements' are not presented in any order of priority.

Priority Statement 1: Transport Infrastructure – Bypass

The potential Melksham bypass is a strategic transportation project, an issue outside of the Neighbourhood Plan scope. It is included in this section as a priority statement due to its local importance.

The Melksham scheme would bypass the town centre and in turn resolve a critical pinch-point on the A350, improving North to South connectivity throughout the Western Gateway. It could be part of a package of road improvement measures that will improve the Northern section of this North-South route.

It has the potential to improve the efficiency of the A350 as well as improve the local economy and quality of the environment within Melksham and Beanacre and assist in meeting Neighbourhood Plan objectives.

The Town and Parish Councils will support efforts by Wiltshire Council to progress the delivery of a bypass, although it must be noted central Government and Wiltshire Council's commitment to, and route of, a bypass is unresolved at the time of making this plan. Support for the progression of the project does not assume the support of both the Town council and/or the Parish Council will be given to any final proposed scheme.

Priority Statement 2 : Levels of Growth and Infrastructure

Wiltshire Council and the Local Plan is responsible for the allocation of strategic housing and employment sites within the Neighbourhood Plan area and development management processes associated with proposals for their development.

The Town and Parish Councils are seriously concerned that housing developments recently consented and delivered within the JMNP2 area have not been accompanied by adequate infrastructure. Both Councils will continue to seek to ensure that new large scale development is accompanied by the provision of sufficient, integrated community and sustainable development infrastructure, including healthcare facilities, schools and highways and sustainable transport infrastructure and open space, which have come under increasing demand.

Both the Parish and Town Councils advocate a holistic approach to future education provision, rather than piecemeal funding, with sufficient primary and secondary school places provided in sustainable locations to meet the needs of existing and all new housing development.

The Neighbourhood Plan cannot direct how Community Infrastructure Levy (CIL) raised through housing development and held by Wiltshire Council is spent. However the community infrastructure levy receipts passed to either Melksham Town Council or Melksham Without Parish Council will be used to address the increased demands that new development places on the civic infrastructure, for the benefit of the Joint Neighbourhood Plan area, focusing on the facilities/infrastructure and communities most impacted by the new development.

Memorandum of Agreement

A Memorandum of Agreement is in place between Melksham Without Parish Council and Melksham Town Council setting out the terms for the sharing of CIL funds, or any replacement funding system. The Memorandum of Agreement will include a Statement of Priorities for infrastructure needs and civic amenity projects which will be reviewed annually and agreed jointly between the Town and Parish Councils. Interdependence can therefore follow through into the appropriate distribution of CIL monies.

Priority Statement 3: Wilts & Berks Canal Restoration

The Town and Parish Council continue to support the safeguarding of the future route for the restoration of the Wilts & Berks canal and its connection to the Kennet & Avon canal and the national canal network.

The opening of a fully restored waterway will provide significant economic, environmental and social benefits to Melksham

Both Councils will continue to engage openly and constructively with the canal restoration project sponsors towards the aim of resolving a viable and acceptable scheme.

Priority Statement 4: Progressing Town Centre Master Plan Area Regeneration

The Joint Melksham Neighbourhood Plan sites assessment and allocation process identified a number of town centre and edge of centre sites that were made available, but have not been allocated. These include The former Blue Pool, Avonside Enterprise Park, Unicorn Public House and the former Lloyds Bank building. The Town Centre Master Plan Report also identified opportunity sites that were not made available for allocation within the three regeneration "cluster" areas:

- Cluster 1 The Campus and Market Place Civic and Cultural Quarter
- Cluster 2 The Old Library, Labour Club and Lowbourne area
- Cluster 3 Avon Riverside, Cooper Tires, The City and the Railway Station

Melksham Town Council will continue to work with stakeholders and the community to progress the delivery of prioritised town centre and edge of centre regeneration and enhancement initiatives identified in the Melksham Town Centre Master Plan Report.

Where proposals will contribute positively towards delivering Neighbourhood Plan objectives and the vitality and attractiveness of the town centre, it will give support to proposals for enhancement or regeneration of town centre and edge of town centre sites including those not specifically allocated by the JMNP or made available for allocation.

Glossary

Ancient Woodland: Land that has had continuous woodland cover since 1600AD as designated by Natural England.

Ancient or veteran tree: A tree which, because of its age, size and condition, is of exceptional biodiversity, cultural or heritage value. All ancient trees are veteran trees. Not all veteran trees are old enough to be ancient, but are old relative to other trees of the same species. Very few trees of any species reach the ancient life-stage.

Biodiversity net gain: Net gain is an approach that uses the planning process to leave biodiversity in a better state than it was before the development started, securing wider benefits for people and the environment.

Brownfield land: See previously developed land

Conservation Area: Conservation Areas exist to manage and protect the special architectural and historic interest of a place – in other words, the features that make it unique.

Development plan: This includes documents that form part of the adopted Local Plan and in the Melksham Area, the Neighbourhood Plan and is defined in section 38 of the Planning and Compulsory Purchase Act 2004.

Economic development: Development, including those within the B Use Classes, public and community uses and main town centre uses (but excluding housing development).

Ecological networks: These link sites of biodiversity importance.

Edge of centre: For retail purposes, a location that is well connected to, and up to 300 metres from, the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances. When considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre.

Green and Blue Infrastructure: A network of multi-functional green and blue environmental assets, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.

Heritage asset: A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing).

Historic environment: All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.

Inclusive design: Designing the built environment, including buildings and their surrounding spaces, to ensure that they can be accessed and used by everyone.

International, national and locally designated sites of importance for biodiversity: All international sites (Special Areas of Conservation, Special Protection Areas, and Ramsar sites), national sites (Sites of Special Scientific Interest) and locally designated sites including County or Local Wildlife Sites.

NPPF: National Planning Policy Framework.

The overall planning policy produced by the Government to inform the making of Development Plans including Neighbourhood Plans and decision making on planning applications. The NPPF was introduced in 2012 and subsequently updated in 2018, 2019, 2021, 2023 and 2024. The NPPF is the principal element of national planning policy.

NPPG or PPG: Planning Practice Guidance.

The overall national planning practice guidance and advice produced by the Government to inform the making of Development Plans including Neighbourhood Plans and decision making on planning applications.

Local Plan: The plan for the future development of the local area, in this case Wiltshire – drawn up by the local planning authority in consultation with the community and statutory bodies. In law this is described as the development plan documents adopted under the Planning and Compulsory Purchase Act 2004. Current core strategies or other planning policies, which under the regulations would be considered to be development plan documents, form part of the Local Plan.

Main town centre uses: Retail development (including warehouse clubs and factory outlet centres) leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

Market Housing: Private housing for rent or sale where the price is set in the open market.

Major Development: A major development is any application that involves:

- mineral extraction
- waste development
- the provision of 10 dwellings or more
- a site area of over 0.5 hectare and the number of dwellings is not known.
- floorspace of over 1,000sqm or a site area of one hectare

Neighbourhood Plan: A plan prepared by a Town or Parish Council or Neighbourhood Forum for a particular Neighbourhood Area (made under the Planning and Compulsory Purchase Act 2004).

Open space: All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity. This can include privately owned open spaces such as playing fields.

Previously developed land: Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill.

Reserved Matters Application: An application which deals with some or all of the outstanding details of the outline application proposal, including:
• appearance – aspects of a building or place which affect the way it looks, including the exterior of the development
• means of access – covers accessibility for all routes to and within the site

• landscaping – the improvement or protection of the amenities of the site and the area and the surrounding area, this could include planting trees or hedges as a screen
• layout – includes buildings, routes and open spaces within the development and the way they are laid out in relation to buildings and spaces outside the development
• scale – includes information on the size of the development, including the height, width and length of each proposed building. The details of the reserved matters application must be in line with the outline approval.

Sequential Test (Town Centre): The Sequential Test ensures that a sequential approach is followed to steer new development to areas in the most sustainable location. This requires that applications for main town centre uses (e.g. shops) should be located in town centre locations. If that is not possible, then they should be located in edge of centre locations, and only if suitable sites are not be available should out of centre sites be considered.

SHELAA: The Strategic Housing and Economic Land Availability Assessment (SHELAA) is a process that is carried out by Wiltshire Council to find possible land for development.

WCS: Wiltshire Core Strategy. A key document in the Wiltshire Development Plan.

Wheeling: A term to cover various modes of travel (non car) that use wheels, such as scooters or bicycles.

WWDP: West Wiltshire District Plan. A number of policies from the West Wiltshire District Plan are saved and form part of the Wiltshire Development Plan.

Appendix 1
Community Engagement Protocol

Introduction

The prime aim of this Protocol is to do all possible to ensure that new development in the Neighbourhood Plan area delivers good quality places to live and work. Its use will also contribute to improved outcomes for the current and future communities, as well as assisting applicants to make applications that accord with this plan and with those of Wiltshire Council. It is crucial for success with these aims for the community engagement to start very early in the preparation of applications, working with the communities of Melksham via the Town and Parish Councils.

Use of this Protocol is without prejudice to the eventual judgement of either the Town or Parish Council on the merits of any final application, even if a good engagement process has been agreed and followed.

Pre-application community engagement is considered to be especially important in relation to any strategic site allocations made by Wiltshire Council, particularly with regard to any associated requirements for development briefs and master plans that are to be approved by Wiltshire.

Context

National

National Planning Practice Guidance and the National Planning Policy Framework (NPPF) make several mentions of the considerable value of pre-application involvement, for example, in NPPF paragraph 39:

"Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community."

The "10 Commitments for Effective Pre-application Engagement" (Local Government Association, 2014) published nationally by a group representing planning, industry and community groups, states that:

"Early, collaborative discussions between developers, public sector agencies and the communities affected by a new development can help to shape better quality, more accepted schemes and ensure improved outcomes for the community. These discussions also avoid wasted effort and costs."

Wiltshire

Wiltshire Council's Statement of Community Involvement (SCI) 2020 states that it encourages:
"developers and applicants to engage with local people and communities including Town and Parish Councils and with neighbours, when appropriate, before submission of a planning application. ... The government have stated that such engagement is discretionary, but it is strongly encouraged by the Council prior to the submission of applications for ten or more houses, or other large developments on sites of I hectare or more."

The SCI outlines in detail how communities can be involved in planning applications. It is acknowledged that whilst in the early stages of considering a development proposal, applicants may wish for any discussions with Wiltshire Council to be confidential, involvement of the local community can and should happen at the earliest possible stage.

Process

Whilst there is an emphasis on early and positive pre-application engagement in major development proposals, the approach should also apply to smaller developments in the plan area because these can have at least as much impact as larger ones. Melksham Town Council and Melksham Without Parish Council will play their appropriate role in delivering high quality pre-application engagement with themselves and with the wider community in the early stage of proposals that come forward.

Melksham Without Parish almost entirely surrounds Melksham Town. For development that takes place on the periphery of one or other Council area, and within other places in Melksham Without that are of high importance to the town (such as the commercial areas located at Bowerhill and Hampton Park etc.), both Councils will play a role.

Therefore, in respect of development proposals affecting the commercial areas, or residential sites on the periphery of Melksham Town, both Councils should be consulted in pre-application engagement.

Drawing from the 10 Commitments and other guidance on best practice, potential applicants should work with Melksham Town Council and Melksham Without Parish Council to fulfil the following principles:

- **'Day One' contact**: By far the best results for all emerge when contact is made with the relevant Council, and through us with our local community, at the earliest possible point in the process; consulting people late with already prepared schemes is not productive. See the end of this Protocol for contact details

for the Town and Parish Councils. Wiltshire Council are also asked by the Town and Parish Councils to pass on contact details to applicants.

- **Agreed Process:** A key aim of this early contact is to discuss and agree the nature, scope, timetable, information and so forth of the engagement – i.e. the process to be followed. This should have particular regard to if and how both Councils should be involved in the process as noted above. For major development applications this will include Wiltshire Council.
- **Applicant Leadership but Shared Responsibility:** Although it is the applicant's role to lead and fund engagement, the Town and/or Parish Council will offer as much support as possible to any agreed process; for example by providing local information, contact details for local groups, advice on meeting places, access to newsletters and so forth.
- **Openness and Transparency:** Building trust between all and ensuring an agreed outcome depend heavily on having a process that is as open as possible on all sides, though the Town and/or Parish Council will respect any issues of clear commercial confidentiality.
- **Agreed Community:** A project may have an impact on a limited number of people or on all of the Town and/or Parish as appropriate. The details of those to be involved will need to be discussed and agreed for any project, as will the potential ways to contact and engage them.
- **Agreed Scope:** There will also need to be agreement about the scope of the engagement, i.e. what is and is not open to change (e.g. layout, quantum of development, design etc.).
- **Proportionality:** The nature and scale of engagement will be balanced in appropriate proportion to the scale and likely impact of any proposals, for example small householder applications are very unlikely to need to undertake more than neighbour consultations.
- **Statement of Community Consultation:** For major development proposals applications, a statement of community consultation should be submitted. This should describe and summarise the outcomes of the engagement, demonstrating how the proposals have (or have not) responded to results. If they have not, a short note should be included to explain this. If the process has been followed fully, the Town and/or Parish Council will endorse this report; if not they may submit their own evaluation of it*. For smaller development proposals, a short statement describing and summarising the outcomes of the engagement is encouraged.

Contact Details

Initial contact should be made at the very outset with the Town and/or Parish Councils:

towncouncil@melksham-tc.gov.uk

clerk@melkshamwithout-pc.gov.uk

The Town and/or Parish Council commits to doing all possible to arrange an initial meeting as soon as possible following contact.

Additional Notes

Melksham Without Parish Council will only consider taking on ownership and management of equipped play areas from developers, such as LEAPs (Local Equipped Area for Play) and NEAPs (Neighbourhood Equipped Area for Play) but not LAPs (Local Landscaped Area for Play).

*As in the opening proviso, endorsement of an engagement process and results does not necessarily mean support for the resulting proposals.

Appendix 2 Evidence Base Summary

Neighbourhood Area Level Evidence

Prepared for the Neighbourhood Plan

- Site Options and Assessment Report (2023 Aecom)
- Viability opinion - Cooper Tires, former Library, Whitley Farm sites (2024 Bailey Venning Associates)
- Addendum to Viability opinion - Cooper Tires (additional scenarios) (2024 Bailey Venning Associates)
- Appendices to Addendum to Viability opinion - Cooper Tires (additional scenarios) (2024 Bailey Venning Associates)
- Cooper Tires Initial Site Capacity Assessment (2024 AKU)
- Site Allocation Topic Paper (2024 Place Studio)
- Melksham Design Guide and Code (2023 Aecom)
- Local Green Space Report (2023 JMNP2)
- Green Gap & Wedge Study (2023 Aecom/Iceni Projects)
- Green Gap & Wedge StudyAddendum (2024 JMNP2)
- Locally Valued Heritage Assets (2023 JMNP2)
- Town Centre Masterplan (2023 Aecom)
- Melksham Town Centre Car Parking Study (2024 AECOM)
- Housing Needs Assessment (2023 Aecom)
- Community Facilities Evidence Base Report (2020/Minor update 2023 JMNP2)
- Green Infrastructure Evidence Base Report (2020/Minor Update 2023 JMNP2)
- Local Landscape Character Evidence Base Report (2020 JMNP1)
- Housing Need Assessment (AECOM, 2022)
- Points of the Compass Appraisal (AECOM, 2017)
- Heritage Assessment (Policy 7.3 Allocation of Land at Whitley Farm) (John Davey, 2020)
- Town and Parish Pre-application Protocol (see Appendix 1)
- Consultation Statement (2024 JMNP)
- Basic Conditions Statement (2024 Place Studio)
- Modification Statement (2024 Place Studio)
- Strategic Environmental Assessment Reports (2024 Aecom)

All are available on the JMNP2 evidence webpages.

JMNP2 also references other relevant evidence base material from sources such as Wiltshire Council. These are referenced throughout the Neighbourhood Plan.



MELKSHAM
NEIGHBOURHOOD PLAN

APPENDIX J - EXAMINERS REPORT FOR JMNP2

Joint Melksham Neighbourhood Development Plan 2
2020-2038

A report to Wiltshire Council on the Joint Melksham Neighbourhood Development Plan 2

Andrew Ashcroft
Independent Examiner
BA (Hons) MA, DMS, MRTPI

Director – Andrew Ashcroft Planning Limited

Executive Summary

1 I was appointed by Wiltshire Council in February 2025 to carry out the independent examination of the Joint Melksham Neighbourhood Development Plan 2. It is a review of the made Plan.

2 The examination was undertaken by written representations. I visited the neighbourhood area on 17 February 2025.

3 The Plan is an excellent example of a neighbourhood plan review. It seeks to bring the Plan up-to-date. It includes a variety of policies and identifies positive and sustainable development. It addresses housing delivery in the Plan period.

4 The Plan has been underpinned by community support and engagement. All sections of the community have been engaged in its preparation.

5 Subject to a series of recommended modifications set out in this report, I have concluded that the Joint Melksham Neighbourhood Development Plan 2 meets all the necessary legal requirements and should proceed to referendum.

6 I recommend that the referendum area should coincide with the neighbourhood area.

Andrew Ashcroft
Independent Examiner
2 May 2025

1 Introduction

1.1 This report sets out the findings of the independent examination of the Joint Melksham Neighbourhood Development Plan 2 2020-2038 ('the Plan').

1.2 The Plan was submitted to Wiltshire Council (WC) by Melksham Town Council and Melksham Without Parish Council in their capacity as the qualifying bodies (the QBs) responsible for preparing the neighbourhood plan.

1.3 Neighbourhood plans were introduced into the planning process by the Localism Act 2011. They aim to allow local communities to take responsibility for guiding development in their area. This approach was subsequently embedded in the National Planning Policy Framework (NPPF) in 2012, 2018, 2019, 2021, 2023 and 2024. The NPPF continues to be the principal element of national planning policy.

1.4 The role of an independent examiner is clearly defined in the legislation. I have been appointed to examine whether the submitted Plan meets the basic conditions and Convention Rights and other statutory requirements. It is not within my remit to examine or to propose an alternative plan, or a potentially more sustainable plan except where this arises because of my recommended modifications to ensure that the plan meets the basic conditions and the other relevant requirements.

1.5 A neighbourhood plan (and a review of a plan) can be narrow or broad in scope and can include whatever range of policies it sees as appropriate to its designated neighbourhood area. The submitted Plan has been designed to be distinctive in general terms, and to be complementary to the existing development plan and to the emerging Local Plan. It seeks to provide a context in which the neighbourhood area can maintain its character and setting in the wider landscape and deliver new homes in the Plan period.

1.6 Within the context set out above, this report assesses whether the Plan is legally compliant and meets the basic conditions that apply to neighbourhood plans. It also considers the content of the Plan and, where necessary, recommends changes to its policies and supporting text.

2 The Role of the Independent Examiner

2.1 The examiner's role is to ensure that any submitted neighbourhood plan meets the relevant legislative and procedural requirements.

2.2 I was appointed by WC, with the consent of the QBs, to conduct the examination of the Plan and to prepare this report. I am independent of both WC and the QBs. I do not have any interest in any land that may be affected by the Plan.

2.3 I possess the appropriate qualifications and experience to undertake this role. I am a Director of Andrew Ashcroft Planning Limited. I have 42 years' experience in various local authorities at either Head of Planning or Service Director level and more recently as an independent examiner. I have significant experience of undertaking other neighbourhood plan examinations. I am a member of the Royal Town Planning Institute and the Neighbourhood Planning Independent Examiner Referral System.

Examination Outcomes

2.4 The examination process for the review of a 'made' neighbourhood plan is set out in Section 3 of this report.

2.5 The outcome of the examination is set out in Section 8 of this report.

Other examination matters

2.6 In examining the Plan, I am required to check whether:

- the policies relate to the development and use of land for a designated neighbourhood plan area; and
- the Plan meets the requirements of Section 38B of the Planning and Compulsory Purchase Act 2004 (the Plan must specify the period to which it has effect, must not include provision about development that is excluded development, and must not relate to more than one neighbourhood area); and
- the Plan has been prepared for an area that has been designated under Section 61G of the Localism Act and has been developed and submitted for examination by a qualifying body.

2.7 I have addressed the matters identified in paragraph 2.6 of this report and am satisfied that they have been met.

3. Procedural Matters

3.1 In undertaking this examination I have considered the following documents:

- the submitted Plan.
- the Basic Conditions Statement.
- the Consultation Statement and its various appendices.
- the WC SEA/HRA screening reports.
- the Environmental Report and its Addendum
- the Design Guidelines and Codes
- the Melksham Town Centre Masterplan
- the Local Green Spaces Evidence Report
- the Green Gap and Green Wedge Assessment
- the Green Gap and Green Wedge Assessment Addendum
- the Community Facilities Evidence Report
- the Green and Blue Infrastructure Evidence Report (and its update)
- the Locally Valued Heritage Assets Reports
- the Housing Needs Assessment
- the Site Options and Assessment Report
- the QBs' Modification Statement.
- the WC Modification Statement.
- the representations made to the Plan.
- the QB's responses to the clarification note.
- the adopted Wiltshire Core Strategy.
- the adopted Wiltshire Housing Allocations Local Plan
- the submitted Wiltshire Local Plan
- the National Planning Policy Framework (December 2023 and December 2024).
- Planning Practice Guidance.
- relevant Ministerial Statements.

3.2 I visited the neighbourhood area on 17 February 2025. I looked at its overall character and appearance and at those areas affected by policies in the Plan in particular.

3.3 It is a general rule that neighbourhood plan examinations should be held by written representations only. Having considered all the information before me, including the representations made to the submitted plan, I concluded that the Plan could be examined by written representations. I was assisted in this process by the comprehensive nature of the representations and the professional way in which the Plan has been developed.

The examination process for the review of a neighbourhood plan

3.4 The Neighbourhood Planning Act 2017 identifies the circumstances that might arise as and when qualifying bodies seek to review 'made' neighbourhood plans and introduces a proportionate process to do so based on the changes proposed.

3.5 There are three types of modification which can be made to a neighbourhood plan or order. The process will depend on the degree of change which the modification involves and as follows:

- minor (non-material) modifications to a neighbourhood plan or order which would not materially affect the policies in the plan or permission granted by the order. These may include correcting errors, such as a reference to a supporting document, and would not require examination or a referendum; or
- material modifications which do not change the nature of the plan or order and which would require examination but not a referendum. This might, for example, entail the addition of a design code that builds on a pre-existing design policy, or the addition of a site or sites which, subject to the decision of the independent examiner, are not so significant or substantial as to change the nature of the plan; or
- material modifications which do change the nature of the plan or order would require examination and a referendum. This might, for example, involve allocating significant new sites for development.

3.6 The QBs have considered this issue. The Modifications Statement comments that the modifications are material and significant, and therefore change the nature of the Plan.

3.7 WC has also undertaken a separate assessment of the issue. It takes the same view as the QBs on the scale and nature of the modifications to the policies in the 'made' Plan.

3.8 I have considered these assessments very carefully. I agree with the two conclusions, and the examination of the Plan will proceed on this basis

The December 2024 update of the NPPF

3.9 The NPPF was updated on 12 December 2024. Paragraph 239 of the NPPF 2024 sets out transitional arrangements for plan-making. It comments that the policies in the Framework will apply for the purpose of preparing neighbourhood plans from 12 March 2025 unless a neighbourhood plan proposal has been submitted to the local planning authority under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended) on or before the 12 March 2025.

3.10 On this basis, the examination of the Plan against the basic condition that it should have regard to national policies and advice contained in guidance issued by the Secretary of State is based on the 2023 version of the NPPF. Plainly the Plan was submitted earlier in the year in that context. Where NPPF paragraph numbers are used in this report, they refer to those in the December 2023 version.

3.11 Paragraph 6.2 of this report sets out the full extent of the basic conditions against which a neighbourhood plan is examined.

4 Consultation

Consultation Process

4.1 Policies in made neighbourhood plans become the basis for local planning and development control decisions. As such neighbourhood plans need to be supported and underpinned by public consultation.

4.2 In accordance with the Neighbourhood Planning (General) Regulations 2012 (as amended), the QBs prepared a Consultation Statement. It is proportionate to the neighbourhood area and its policies. It is an excellent example of a Statement of this type. It sets out key findings and underpinned with a series of more detailed tables and appendices.

4.3 Section 2 of the Statement records the various activities that were held to engage the local community. This process reflects the nature of the review of a 'made' Plan. Table 1 helpfully summarises the key steps and activities

4.4 Section 3 of the Statement also provides specific details on the consultation processes that took place on the pre-submission version of the Plan (October to November 2023).

4.5 Section 4 advises about the comments received on the pre-submission Plan and the way in which the QBs revised the Plan because of this exercise. Further information is provided in Appendix 6 of the Statement. In the round this wider package of information helps to explain the way in which the Plan has evolved.

4.6 I am satisfied that consultation has been an important element of the Plan's production. Advice on the neighbourhood planning process has been made available to the community in a positive and direct way by those responsible for the Plan's preparation. From all the evidence provided to me as part of the examination, I can see that the Plan has promoted an inclusive approach to seeking the opinions of all concerned throughout the process. WC has carried out its own assessment that the consultation process has complied with the requirements of the Regulations.

Consultation Responses

4.7 Consultation on the submitted plan was undertaken by WC. It ended on 22 January 2025. This exercise generated representations from the following organisations:

- Wiltshire Council
- Robert Hitchins Limited
- Environment Agency
- Swift Bricks
- Hannick Homes and Developments Limited
- Maypool Estates Limited/Waddeton Park Limited
- National Grid
- NHS Property Services Limited

- Historic England
- Neston Park Estate
- BXB Limited
- Catesby Estates Limited
- Waddeton Park Limited
- Gladman Developments Limited
- Ministry of Defence
- Natural England
- Martin Grant Homes
- Mr Peter Richards (as a landowner)

4.8 Representations were also received from residents of the neighbourhood area.

4.9 I have taken account of all the representations in preparing this report. Where it is appropriate to do so, this report refers to representations on a policy-by-policy basis.

5 The Neighbourhood Area and the Development Plan Context

The Neighbourhood Area

5.1 The neighbourhood area consists of the parishes of Melksham and Melksham Without. The market town of Melksham is about 4.5 miles northeast of Trowbridge and 6 miles south of Chippenham. It is Wiltshire's fourth-largest settlement after Salisbury, Chippenham, and Trowbridge. It occupies a strategic location on the north-south A350 road. The population of the neighbourhood area in 2021 was approximately 25,300 people. The neighbourhood area was designated on 14 July 2014 and amended on 8 November 2017.

5.2 Melksham is an attractive market town based on the River Avon. A series of arterial roads converge in the Market Place which hosts a series of historic and civic buildings. The town centre hosts a series of national and independent retail and commercial services. The railway station is located to the west of the A350. In recent years modern residential development has taken place to the south and east of the town off Western Way and Eastern Way which connect the A350 with the A3102 (which leads to Calne).

5.3 Melksham Without is the traditional hinterland of the town. It surrounds Melksham on its northern, eastern, and southern sides. It includes the three villages of Beanacre, Shaw and Whitley. In the round the neighbourhood area is a very interesting place in which to prepare a neighbourhood plan. It provides a sound basis for a proper assessment of the future development needs of the town and its immediate hinterland.

Development Plan Context

5.4 The Wiltshire Core Strategy was adopted in January 2015. It defines the spatial vision for the whole of the administrative area of Wiltshire Council and sets out a development strategy to meet its objectives. It includes strategic planning policies to guide and control the overall scale, type and location of development including the allocation of strategic sites.

5.5 The neighbourhood area is in the Melksham Community Area. The Wiltshire Core Strategy comments that a high level of residential development was already proposed in Melksham (at that time), including a planned urban extension to the east of the town on land identified in the West Wiltshire District Plan (2004), and that this planned development will go some way towards addressing the future affordable housing need in the town. It advises that 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. Core Policy 15 identifies a settlement strategy as follows:

- Market Town: Melksham and Bowerhill Village
- Large Villages: Shaw/Whitley
- Smaller Villages: Benacre, Berryfield

5.6 WC adopted the Wiltshire Housing Site Allocations Plan in February 2020. Whilst that Plan allocated several housing allocations across Wiltshire, it did not allocate sites in the neighbourhood area.

5.7 The Wiltshire Local Plan (2020-2038) was submitted for examination in November 2024. It includes the following policies for Melksham:

- Policy 17 Melksham Market Town - this is a general policy which establishes a strategic context for the town. It also identifies the following three housing allocations;
- Policy 18 Land East of Melksham – land is allocated for approximately 425 dwellings, 5ha of employment uses, a local centre, and a 2ha site for a 2-form entry primary school to include 60 early years places;
- Policy 19 Land off Bath Road – land is allocated to provide approximately 135 dwellings and 2ha of land secured for the expansion of Melksham Oak Academy; and
- Policy 20 Land north of the A3102 – land is allocated for approximately 285 dwellings and 0.4ha of land for a 100-place nursery.

The relationship between the submitted neighbourhood plan and the emerging Local Plan is addressed in several of the representations received to the neighbourhood plan. I address this matter in Section 7 of this report.

5.8 The submitted Plan has been prepared within its up-to-date development plan context. In doing so, it has relied on up-to-date information and research that has underpinned existing planning policy documents. This is good practice and reflects key elements in Planning Practice Guidance on this matter.

Visit to the neighbourhood area

5.9 I visited the neighbourhood area on 17 February 2025. I approached it from the A350 from the north. This helped me to understand its position in the wider landscape in general and its accessibility to the strategic road network.

5.10 I looked initially at Beanacre. I saw its layout along the A350, its proximity to the River Avon, and its relationship with Melksham. I then looked at the Cooper Tires site. I noted its size, current condition, and its location both in relation to the town centre and the River Avon. I also took the opportunity to look at the various commercial uses on the western side of the A350 and the railway station. I saw the challenges involved in accessing the railway station from the town centre and vice versa.

5.11 I then looked at the town centre. I saw its range of national and independent retail and commercial services. I saw the significance of the River Avon, and the importance of the Market Place in the wide townscape. During this part of the visit, I looked at the housing allocation at the former Library site, and at the King George V Recreation Ground.

5.12 I then looked at Bowerhill. I saw its relationship with Melksham and its range of commercial services. I looked at the proposed housing allocation at Land South of Western Way. I then looked at the separation between Berryfield and Semington (to the immediate south of the neighbourhood area) and between Berryfield and Melksham.

5.13 I then drove back towards the town centre and followed the Bath Road to Shaw. I saw the significance of Christ Church in the village environment and the obvious importance of the Village Hall and the School to the local community.

5.14 Then drove to Whitley. I saw the range of commercial uses on Top Lane including the popular Sprocketts Coffee/Spindles Bikes. I looked at the proposed housing allocations at Whitley Farm, Whitley and at Middle Farm. In the case of the former, I noted the range of historic buildings on the site.

5.15 Throughout the part of the visit in Shaw and Whitley I looked very carefully at the proposed Green Wedges as proposed in Policy 19 of the Plan. I noted the way in which they related to the natural and agricultural landscapes and South Brook.

5.16 I returned to the A350 along Westlands Lane. This highlighted the relationship of Melksham to the surrounding countryside. I also saw the significance of the National Grid substation.

6 The Neighbourhood Plan and the Basic Conditions

6.1 This section of the report deals with the submitted neighbourhood plan as a whole and the extent to which it meets the basic conditions. The submitted Basic Conditions Statement has helped in the preparation of this section of the report. It is an informative and well-presented document.

6.2 As part of this process, I must consider whether the submitted Plan meets the basic conditions as set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990. To comply with the basic conditions, the Plan must:

- have regard to national policies and advice contained in guidance issued by the Secretary of State;
- contribute to the achievement of sustainable development;
- be in general conformity with the strategic policies of the development plan in the area;
- not breach, and otherwise be compatible with, the assimilated obligations of EU legislation (as consolidated in the Retained EU Law (Revocation and Reform) Act 2023 (Consequential Amendment) Regulations 2023; and
- not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.

I assess the Plan against the basic conditions under the following headings.

National Planning Policies and Guidance

6.3 For the purposes of this examination the key elements of national policy relating to planning matters are set out in the National Planning Policy Framework December 2023 (NPPF).

6.4 The NPPF sets out a range of land-use planning principles to underpin both plan-making and decision-taking. The following are particularly relevant to the Joint Melksham Neighbourhood Development Plan 2:

- a plan-led system - in this case the relationship between the neighbourhood plan, the Wiltshire Core Strategy, and the Wiltshire Housing Site Allocations Local Plan;
- building a strong, competitive economy;
- recognising the intrinsic character and beauty of the countryside and supporting thriving local communities;
- taking account of the different roles and characters of different areas;
- highlighting the importance of high-quality design and good standards of amenity for all future occupants of land and buildings; and
- conserving heritage assets in a manner appropriate to their significance.

6.5 Neighbourhood plans sit within this wider context both generally, and within the more specific presumption in favour of sustainable development. Paragraph 13 of the NPPF

indicates that neighbourhoods should both develop plans that support the strategic needs set out in local plans and plan positively to support local development that is outside the strategic elements of the development plan.

6.6 In addition to the NPPF I have also taken account of other elements of national planning policy including Planning Practice Guidance and the recent ministerial statements.

6.7 Having considered all the evidence and representations available as part of the examination I am satisfied that the submitted Plan has had regard to national planning policies and guidance subject to the recommended modifications in this report. It sets out a positive vision for the future of the neighbourhood area. It updates the Plan to take account of changes in national policy and emerging local policies.

6.8 At a more practical level, the NPPF indicates that plans should provide a clear framework within which decisions on planning applications can be made and that they should give a clear indication of how a decision-maker should react to a development proposal (paragraph 16d). This was reinforced with the publication of Planning Practice Guidance. Paragraph ID: 41-041-20140306 indicates that policies in neighbourhood plans should be drafted with sufficient clarity so that a decision-maker can apply them consistently and with confidence when determining planning applications. Policies should also be concise, precise, and supported by appropriate evidence.

6.9 As submitted the Plan does not fully accord with this range of practical issues. Most of my recommended modifications in Section 7 relate to matters of clarity and precision. They are designed to ensure that the Plan fully accords with national policy.

Contributing to sustainable development

6.10 There are clear overlaps between national policy and the contribution that the submitted Plan makes to achieving sustainable development. Sustainable development has three principal dimensions – economic, social, and environmental. I am satisfied that the submitted Plan has set out to achieve sustainable development in the neighbourhood area. In the economic dimension, the Plan includes policies for housing in defined settlements (Policy 6), for five housing allocations (Policies 7.1-7.5), for the town centre (Policy 9), and for employment uses (Policy 10). In the social dimension, it includes policies on community facilities (Policy 15), and on local green spaces (Policy 16). In the environmental dimension, the Plan positively seeks to protect its natural, built, and historic environment. It has policies on a series of issues relating to the natural environment, proposed Green Wedges, and design. This assessment overlaps with the details on this matter in the submitted Basic Conditions Statement.

General conformity with the strategic policies in the development plan

6.11 I have already commented in detail on the development plan context in Wiltshire in paragraphs 5.4 to 5.8 of this report.

6.12 I consider that the submitted Plan delivers a local dimension to this strategic context and supplements the detail already included in the adopted development plan. Subject

to the recommended modifications in this report, I am satisfied that the submitted Plan is in general conformity with the strategic policies in the development plan.

Strategic Environmental Assessment

6.13 The Neighbourhood Plan General Regulations 2015 require a qualifying body either to submit an environmental report prepared in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 or a statement of reasons why an environmental report is not required.

6.14 In order to comply with this requirement, WC undertook a screening exercise on the need or otherwise for a Strategic Environmental Assessment (SEA) to be prepared for the Plan. The report (July 2022) is thorough and well-constructed. It concludes that it is likely to have significant environmental effects and that a Strategic Environmental Assessment is required.

6.15 The QBs commissioned the preparation of an Environmental Report. The resulting report was initially published in October 2023. It was then updated in October 2024 to take account of changes which had been made to the Plan as it had evolved since that time.

6.16 The two reports are thorough and comprehensive. Section 5 of the October 2023 report makes the following conclusions:

'The Plan is likely to have long-term positive effects in relation to the 'Community Wellbeing' SEA theme. This primarily links to the Neighbourhood Plan's support for high-quality development proposals which would deliver suitable and appropriate housing for the local community (via a range of types, tenures, and affordability), safeguard and improve the availability of services, facilities and amenities, and support opportunities for town centre regeneration.

The Plan will also deliver long-term positive effects in relation to the 'Landscape' and 'Historic Environment' SEA themes. These benefits largely relate to the Neighbourhood Plan's emphasis on protecting and enhancing the relationship between natural and built environment, protecting important landscape and heritage features, and facilitating improvements to the quality of the public realm. While the proposed site allocations are sensitive from a landscape and heritage perspective, it is considered that the neighbourhood plan policies provide a detailed overview of the proposed mitigation and enhancement measures which pro-actively and positively address the sensitivities.

Additionally, the Neighbourhood Plan will bring minor long-term positive effects in relation to the 'Biodiversity and Geodiversity' SEA theme by encouraging proposals to protect existing and establish new habitats, enhance ecological networks (including through green infrastructure enhancements), and deliver net gains.

Uncertain effects are considered likely in respect to climate change and flood risk. The Plan has the potential to lead to positive effects through supporting proposals that promote the inclusion of low carbon technologies and the use of local and traditional building materials, encourage sustainable and active travel, and proactively respond

to the potential impacts of climate change through the implementation of appropriate drainage solutions. However, is it recognised that new development would lead to inevitable increases in greenhouse gas emissions due to an increase in the built footprint of the neighbourhood area.

The Plan also makes provision for transportation and air quality; encouraging proposals which would deliver new and enhanced public rights of way and improvements to the local transport network. This will allow for safe and active transportation around the neighbourhood area and better access to locations further afield. As such, minor long term positive effects are anticipated for transportation and air quality through the implementation of the (Plan).

It is expected the Plan will bring forward minor long term positive effects for land, soil, and water resources in the neighbourhood area by incorporating several provisions will help support the capacity of the landscape to regulate soil and water quality. The allocations within Melksham support a brownfield-first approach to development, encouraging the most efficient use of previously developed land.'

6.17 Section 4 of the October 2023 report considers reasonable alternatives for the Plan. Paragraphs 4.6 to 4.8 comment about the strategic requirements for the Melksham area and the way in which the Plan has been prepared to be complementary to the emerging Local Plan.

6.18 Paragraph 4.10 of the Report advises that the QBs (and the Neighbourhood Plan Steering Group), with support from an independent planning consultancy, completed assessments of the various sites in terms of their suitability, availability, and achievability for the purposes of potential allocations in the Plan.

6.19 Paragraph 4.13 of the Report advises that two overall options were assessed. Option A would meet housing needs through brownfield site allocations and Option B would meet housing needs through greenfield site allocations. Table 4.1 to Table 4.8 present the findings of the appraisal of the options for each of the SEA themes. The Report advises that Option A performs more favourably than Option B, and is ranked the most favourable option with respect to each SEA theme.

6.20 Paragraphs 4.29 to 4.39 of the Report then comment about the outcomes of this process which reflects the allocations included in the submitted Plan.

6.21 In general terms I am satisfied that the Environmental Report has addressed the various matters in a comprehensive way. In addition, it has sought to ensure that the Plan has a proper functional relationship with the emerging Local Plan. Several of the representations comment about the site-selection process. I comment on this matter in Section 7 of this report.

Habitats Regulations Assessment

6.22 WC prepared a Habitats Regulations Assessment (HRA) of the Plan in December 2024. It assesses the potential impact of the Plan's policies on a series of protected sites. The report is commendably detailed.

6.23 The Assessment notes that there are five policies within the Plan that would lead directly to development (Policies 7.1-7.5) and they allocate approximately 415 dwellings and a 70-bed care home. The Assessment advises that development at these allocated sites would not result in likely significant effects on any European sites, either alone or in-combination with other plans or projects. Furthermore, the Assessment advises that none of the other policies within the Plan would lead directly to development, nor would they result in a likely significant effect on any European sites, either alone or in-combination with other plans or projects. The Assessment advises that this conclusion is due to the nature, scope and scale of the proposals set out in the Plan, and on account of the distance of the neighbourhood area from any European sites and the absence of a potential pathway for effect.

6.24 On this basis, the Assessment concludes that the Plan will not result in a likely significant effect on any European sites or their qualifying features either alone or in-combination with other plans and projects. It also advises that, it has not been necessary for the Plan to be subject to an appropriate assessment under the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019.

Human Rights

6.25 In a similar fashion, I am satisfied that the submitted Plan has had regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights (ECHR) and that it complies with the Human Rights Act. There is no evidence that has been submitted to me to suggest otherwise. There has been full and adequate opportunity for all interested parties to take part in the preparation of the Plan and to make their comments known. On this basis, I conclude that the submitted Plan does not breach, nor is in any way incompatible with the ECHR.

Summary

6.26 On the basis of my assessment of the Plan in this section of my report I am satisfied that it meets the basic conditions subject to the incorporation of the recommended modifications contained in this report.

7 The Neighbourhood Plan policies

7.1 This section of the report comments on the policies in the Plan. It makes a series of recommended modifications to ensure that the various policies have the necessary precision to meet the basic conditions.

7.2 The recommendations focus on the policies in the Plan given that the basic conditions relate primarily to this aspect of neighbourhood plans. In some cases, I have also recommended changes to the associated supporting text.

7.3 I am satisfied that the content and the form of the Plan is fit for purpose. It is distinctive and proportionate to the neighbourhood area. The wider community and the QBs have spent time and energy in identifying the issues and objectives that they wish to be included in the review of the Plan. This sits at the heart of the localism agenda.

7.4 The Plan has been designed to reflect Planning Practice Guidance (ID:41-004-20190509) which indicates that neighbourhood plans should address the development and use of land.

7.5 I have addressed the policies in the order that they appear in the submitted Plan.

7.6 For clarity, this section of the report comments on all the policies in the Plan. It highlights the policies which remain unchanged, those which are updated from the made Plan and those which are new.

7.7 Where modifications are recommended to policies they are highlighted in bold print. Any associated or free-standing changes to the text of the Plan are set out in italic print.

The initial parts of the Plan (Sections 1-3)

7.8 The Plan is very well-organised and presented. It makes an appropriate distinction between the policies and their supporting text. The initial elements of the Plan set the scene for the policies. They are proportionate to the neighbourhood area and the subsequent policies. In addition, the Plan is arranged in an attractive way. It makes good use of maps, photographs, and colour.

7.9 The Introduction (Section 1) sets the scene for the Plan. It identifies the Plan period (in paragraph 1.4.3) and the neighbourhood area (in Figure 1). It also comments about:

- the changes proposed to the Plan;
- the preparation of the Plan; and
- how it represents the views of local people.

7.10 Section 2 sets the agenda for the Plan. It comments about:

- the reasoning behind a joint Plan;
- key issues and evidence;
- national policy;
- the emerging Wiltshire Local Plan;
- an introduction to Melksham Town and Melksham Without;

- the concept of Sustainable Development; and
- Climate Change.

7.11 Section 3 set outs the Plan's vision and objectives. The vision is as follows:

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

7.12 The five objectives of the Plan are as follows:

- A 21st century community … meeting the challenges of sustainable development and climate change;
- Great places to live … where our housing and infrastructure needs are balanced with global and regional issues;
- Great places for shopping, working, and getting around;
- Places where community well-being and open spaces are protected and enhanced; and
- A locally distinctive and high quality built and natural environment.

7.13 The remainder of this section of the report addresses each policy in turn in the context set out in paragraphs 7.5 to 7.7 of this report.

General comments on the Plan and the format of its policies

7.14 The Plan is an excellent example of a review of a neighbourhood plan. It helpfully consolidates the review of the Plan into the structure of the 'made' Plan. This results in a series of new policies and the retention of existing policies in the 'made' Plan.

7.15 The Plan is simple to use. The policies are presented in five colour coded sections which relate to the Plan's objectives. In addition, each policy highlights the objectives it seeks to address. Finally, the supporting text for each policy is both comprehensive and helpful. In the round, the approach taken is best practice.

7.16 The Modifications Statement helpfully distinguishes between the policies which remain unchanged, those which have been modified, and those which are new. The focus of this report is on the new policies. I do not comment in significant detail on the retained policies other than where they may have been affected by updates in national planning policy. In some cases, I have recommended modifications to the wording of the retained policies to reflect the approach and language now taken in neighbourhood plans (and which has matured since the Plan was made).

Policy 1: Sustainable Design and Construction

7.17 This is a modified policy. The Plan advises that the proposed modifications add greater detail and clarity, rather than changing the principles of the policy in the made Plan.

7.18 The Plan advises that the context for the policy has quickly changed and that the Wiltshire 2022-2027 Climate Strategy sets out the next five years of the council's

journey to becoming a carbon neutral county, contributing towards the legally binding target of net zero carbon for the UK by 2050. The Plan also advises that the emerging Local Plan updates how the local level of planning policy addresses the challenge of climate change looking ahead to 2038 and this sets the context for ambitious policies in the Plan to address adaptation and mitigation of climate change through local level planning policies as well as through community action.

7.19 The Plan advises that whilst the policy is ambitious, it has been written to support compliant development and will need to be applied flexibly where the applicant can demonstrate that meeting the higher standards is not technically feasible. It also comments that the policy reflects the requirements of the Written Ministerial Statement on Local Energy Efficiency Standards

7.20 The resulting policy is comprehensive. It includes a series of general elements and other elements which refer to specific technical guidelines.

7.21 Martin Grant Homes comments that:

'this policy is both detailed and onerous. It goes well beyond national (including Building Regulations) and local plan requirements, without any justification as to why Melksham faces particular issues in this respect that require a distinct local approach. Much of the policy is merely an unnecessary repeat of the Local Plan policies (e.g. Policy 85 'Sustainable and local carbon energy', Policy 86 'Renewable energy', Policy 87 'embodied carbon', Policy 93 'Green and blue infrastructure). However, the singular JMNP2 policy is cluttered and because it is not an exact duplicate of the Local Plan policies (to be tested though examination), it creates a messy and confusing development management platform, from which to consider planning applications. There is also reference to viability within the JMNP2 policy, which is a different approach to that taken in the Local Plan.'

7.22 Robert Hitchins Ltd comment that:

'Policy 1 will become part of the adopted development plan once JMNP2 is 'made' therefore it needs to be sufficiently clear in order to be applied by decision makers. However, the policy refers to matters that are the subject of Building Regulations (e.g. thermal capacity and insulation, energy consumption, and renewable energy generation). These matters should not be the subject of planning policy but should be applied by qualified Building Inspectors through the Building Regulations process.

The Written Ministerial Statement published on 13th December 2023 was clear that in order to prevent a situation where a multiplicity of local standards exist across the country, LPAs should seek to align with the nationally set Building Regulations. Where any proposed energy efficiency standard in a planning policy seeks to go beyond existing or planned Building Regulations, the WMS states this should be rejected at examination if it is not supported by a well-reasoned and robustly costed rationale. The JMNP2 is not supported by any such rational in support of Policy 1 and therefore, in accordance with the WMS it is clear that the policy should be rejected at examination.'

7.23 I have considered these comments carefully. On the one hand, the intentions of the policy are positive and it has regard to Section 14 of the NPPF. However, on the other

hand, it is much more detailed than the policy in the made Plan and includes either general commentary (such as the energy hierarchy) or requires that development proposals comply with other standards/measures (such as BREAM and CEEQUAL). In this context the policy overlaps with the Building Regulations and does not have regard to the Written Ministerial Statement (Planning-Local Energy Efficiency Standards Update) of December 2023.

7.24 In order to remedy these matters I recommend that the policy is recast so that it has a general rather than a specific focus. This will ensure that it has regard to national policy which now has a focus on addressing energy efficiency through the Building Regulations. I also recommend that the policy is worded so that it can be applied in a proportionate way. I have considered the need for consequential modifications to the supporting text. However, as submitted I am satisfied that it takes an appropriate approach to the wider issue, and properly explains the context to the policy. In this context I am satisfied that paragraphs 4.2.5 and 4.2.6 which comment about net carbon tool box and the UK Housing: Fit for the Future report respectively provide general advice for development proposals which may wish to incorporate such technologies within their design.

7.25 I recommend consequential modifications to the 'Towards New Zero' advisory box. The effect of the modification is to signpost the various measures included as techniques which may help to demonstrate that buildings are built to high environmental standards, rather than as a direct requirement of the policy.

7.26 I recommend the deletion of advisory box 'What is Major Development'. It is factual in nature, and has no direct relevance to the policy.

7.27 Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace the policy with:

'As appropriate to their scale, nature and location, development proposals should demonstrate how they have mitigated and been designed to adapt to the impacts of climate change. This includes:

- **the submission of a Sustainable Energy Strategy to demonstrate how carbon emissions are minimised, with the target of zero carbon in operation (regulated and unregulated energy);**
- **embedding the Energy Hierarchy within the design of buildings by prioritising fabric first, orientation, design, and landscaping, to minimise energy demand for heating, lighting, and cooling, as well as maximising renewable energy generation. Proposals should respond positively to opportunities to improve space heating and energy consumption by considering a range of low-carbon and renewable technologies;**
- **demonstrating good connections to existing services and facilities, and/or a mix of uses that minimises the need to travel by private vehicle;**
- **using carbon sequestration and other sustainable approaches such as shade; and**

- **the retention of existing buildings where practicable, and the incorporation of associated retrofitting measures to improve the energy performance of existing buildings.'**

Delete the advisory box 'What is Major Development'

In the Towards Net Zero advisory box replace 'Policy 1 also references the use of standards to demonstrate that buildings are built to high environmental standards:' with 'the use of the following standards may help to demonstrate that buildings are built to high environmental standards:'

Policy 2: Local Renewable and Low Carbon Energy and Associated Infrastructure

7.28 This is a modified policy. The Plan advises that it has been updated to expand its scope beyond energy generation schemes that are led by, or benefit the local community.

7.29 As part of moving towards the net zero target in a changing climate, the Plan advises that it supports generation of zero or low carbon energy, particularly where it enables communities to take a more active role in, and get direct benefit from, the production of renewable and low carbon local energy.

7.30 The policy refers to protection of local amenity and safety. This includes issues such as noise from battery energy storage systems, and glare/glint from solar panels which can be a problem experienced locally.

7.31 Martin Grant Homes considers that the policy takes an unnecessary strategic approach. I have considered this matter carefully. On the balance of the evidence, I am satisfied that the policy meets the basic conditions. A neighbourhood plan is a natural place for community issues on the planning process to be expressed. In addition, there are community energy generation projects elsewhere in Wiltshire which may provide a template for such schemes in the neighbourhood area.

7.32 WC expresses disappointment that the support for energy storage facilities (in the pre-submission Plan) has been removed. It comments that the QB's approach previously was positive and set criteria to manage proposals. I note these comments. Nevertheless, neighbourhood plan legislation gives considerable flexibility to qualifying bodies on the contents of their plans. In this context, I am satisfied that the Plan does not need to address energy storage facilities to meet the basic conditions.

7.33 In general terms, I am satisfied that the policy takes a positive approach to such proposals and has regard to Section 14 of the NPPF. In this broader context, I recommend that the second and third parts of the policy are combined to reduce duplication. I also recommend that the revised wording clarifies that the conditions to be met are the criteria in the first part of the policy. I also recommend the deletion of the fourth part of the policy. Whilst its emphasis on the use of brownfield land is very positive, a preference is not a land use policy. In addition, it would be unlikely that a developer would have access to multiple parcels of land to be able to exercise the QB's preference. Nevertheless, I recommend that the matter is addressed in the supporting text.

7.34 Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace second and third parts of the policy with:

'Schemes which result in direct benefits to the local community such as energy supplied directly, or financial benefits, will be supported. Proposals for community energy generation projects (with full or partial ownership and/or control by a local community) will be strongly supported. In addition, schemes where the energy produced can be used on or near the generation site or where energy storage is incorporated will be supported. In both cases, proposals should comply with the criteria in the first part of this policy.'

Delete the fourth part of the policy.

At the end of paragraph 4.3.3 add: 'Wherever practicable, proposals that harness existing buildings and structures and/or that are located on brownfield land, should be selected as a preference to the use of greenfield land for renewable energy generation or associated infrastructure.'

Policy 3: Flood Risk and Natural Flood Management

7.35 This is a modified policy. The Plan advises that it has been updated with minor details to reflect feedback from WC and other statutory consultees as the Plan was prepared.

7.36 The supporting text comments that community consultations have highlighted ongoing strong concerns over development in high flood risk areas, and the importance of protecting homes from flood damage. The Plan advises that one of the major impacts of a changing climate is an increased risk of flooding and this is a significant issue for parts of the north west and south east of Melksham.

7.37 In general terms, the policy takes a positive approach to this matter and has regard to Section 14 of the NPPF. The Environment Agency suggests that the scope of the policy is expanded to address other forms of flooding to reflect the scope of the NPPF. Whilst such an approach would have merit, it is not required to ensure that the Plan meets the basic conditions. This conclusion recognises that a neighbourhood plan does not need to repeat or restate national policy.

7.38 Martin Grant Homes considers that the policy takes an unnecessary strategic approach. I have considered this matter carefully. On the balance of the evidence, I am satisfied that the policy meets the basic conditions. Paragraphs 4.4.2 and 4.4.6 of the Plan identify specific circumstances in the neighbourhood area which have resulted in the preparation of the policy. In addition, a neighbourhood plan is a natural place for community issues on the planning process to be expressed.

7.39 In this broad context I recommend that the first and second parts of the policy are modified. In relation to the former, the recommended modifications simplify the policy. In relation to the latter, the modification introduces a proportionate element (to acknowledge that minor and domestic proposals will have limited effects on the approach taken) and simplifies the policy.

7.40 I also recommend that the third and fourth parts of the policy are deleted and relocated to the supporting text. This acknowledges that they are process matters rather than land use planning policies. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace the policy with:

'Natural flood management works to conserve and enhance the ecological flood storage value of the water environment, including watercourse corridors and catchments, will be supported. Development proposals in locations with known flooding issues should include appropriate mitigation and construction methods, and, where appropriate, contributions towards wider catchment projects.

As appropriate to their scale, nature and location, development proposals should demonstrate how flood risk is mitigated. This approach should include measures to reduce the amount of rainwater run-off and incorporate Sustainable Drainage Systems.'

At the end of paragraph 4.4.3 add: 'Where required, flood risk and ground water assessments should be undertaken and surface water drainage strategy must be developed and delivered. The drainage strategy must ensure that flood risk is addressed to 1 in 100-year storm event plus climate change in line with Environment Agency Guidance. This is particularly relevant to the South Brook catchment area which has been identified as a priority flood risk area due to surface water flooding.'

Policy 4: Ultra Low Emission Vehicle Charging

7.41 This is a modified policy. The Plan advises that the policy has been updated with minor details to reflect feedback from WC.

7.42 The Plan comments that it is important that all new homes enable people to safely and conveniently access ultra-low energy vehicle (EV) infrastructure. In addition, the Melksham Design Guidelines and Codes (2023) includes a checklist that includes consideration of how charging points are integrated into proposals.

7.43 I recommend that the first and second parts of the policy are deleted. As paragraph 4.5.2 comments, the requirement for EV facilities within new developments is now addressed national in the Building Regulations. I also recommend modifications to the third part of the policy to bring the clarity required by the NPPF and to allow WC to be able to apply the policy through the development management process.

7.44 Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace the policy with:

'Insofar as planning permission is required, proposals for the installation of public on-street electric charging facilities will be supported subject to heritage and other related design matters.'

Policy 5: Community Engagement

7.45 This policy remains unchanged from the made Plan. The supporting text comments that the importance and benefit of community engagement is strongly endorsed in national planning policy and guidance as key to shaping high quality places to live. It also advises that early discussion between applicants and the local community, as well as with the Local Planning Authority enables a more collaborative approach to the process of preparing a development proposal that will need to balance many factors as the design evolves. The supporting text makes direct references to national policy in the NPPF (paragraphs 39 to 46 on the general importance of pre-application advice, and paragraph 137 on the implications for proposals where the community has been engaged on their design).

7.46 The approach taken in the policy is underpinned by the Melksham Community Engagement Protocol.

7.47 Robert Hitchins Ltd comment that:

'all planning applications should be determined on their own merits. This is a longstanding and central planning doctrine, which the policy as currently drafted would violate. Regardless of whether there has been any pre-application engagement, a development which is acceptable in planning terms should be granted permission, in accordance with S38(6) of the Planning and Compulsory Purchase Act 2004, S70(2) of the Town and Country Planning Act 1990, and Paragraph 2 of the NPPF. The policy as currently drafted would perilously introduce a system which prioritises process over substance and as such, Pegasus Group object in the strongest terms. The policy must be re-worded to encourage pre-application engagement but not introduce penalties for non-compliance.'

7.48 Catesby comment that:

'the policy has been misinterpreted from the NPPF and would result in bias by anyone using the policy in application determination. It should be deleted.'

7.49 I have considered these comments and the QB's overall approach to this matter very carefully. On the one hand, the policy seeks to provide a degree of local distinctiveness to the approach taken in the NPPF. The Melksham Community Engagement Protocol is a very good example of a local approach. In addition, I note the QBs comments about the success of the approach in its response to the clarification note. However, on the other hand, the first part of the policy partly repeats national policy in the NPPF, and partly misapplies that approach to the wider development management process rather than to the design process (as set out in paragraph 137 of the NPPF). It also includes process advice (that pre-application community engagement is also expected for reserved matters applications as well as outline or full planning applications).

7.50 On the balance of the evidence, I recommend that the policy is recast to bring the clarity required by the NPPF and to address the following matters:

- the deletion of the element of the policy which repeats the approach taken nationally in the NPPF; and

- the relocation of the process element of the policy into the supporting text.

7.51 Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace the policy with:

'Development proposals should be prepared with early, proactive, proportionate, and effective engagement. Developers are therefore encouraged to follow the approach set out in the Melksham Community Engagement Protocol and the Wiltshire Council Statement of Community Involvement.'

At the end of paragraph 4.6.5 add: 'Pre-application community engagement can also be equally beneficial for reserved matters applications.'

Policy 6: Housing at Defined Settlements

7.52 This is a modified policy. The supporting text advises that this policy has been updated to refer to updated evidence base material and draws on specific aspects to set updated policy parameters for housing types, sizes, and tenures. The submitted Housing Needs Assessment (HNA) is a very detailed and interesting document. The supporting text also comments that the Wiltshire Core Strategy (and emerging Local Plan) classifies and establishes settlement boundaries which generally delineate the extent of urban areas.

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

7.54 In general terms I am satisfied that the policy takes a positive approach to this matter. It will ensure that new residential development is in a sustainable location with ready access to community and commercial facilities. In this context, it has regard to Sections 5 and 8 of the NPPF. Within this overall context I recommend that the opening element of the third part of the policy is modified so that it identifies requirements for new housing developments rather than commenting that they will be supported. This acknowledges that WC will consider all relevant development plan policies in determining development proposals. I also recommend that the connection between the opening element of the policy and its detailed components is applied in a proportionate way. This acknowledges that development proposals will not necessarily impact on all the criteria in the policy.

7.55 Robert Hitchins Ltd comment about the extent to which the policy's criteria for affordable housing delivery goes further than the emerging Local Plan strategic Affordable Housing Policy 76. I have considered this matter very carefully. On the balance of the evidence, I am satisfied that the third part of the policy takes a balanced and evidence-based approach and underpinned by the HNA. In addition, other than

the element on First Homes, the policy is general rather than specific in its nature. Furthermore, a neighbourhood plan is assessed against the strategic policies in the adopted development plan rather than in an emerging Local Plan. Nevertheless, I recommend that part 3c of the policy is modified so that it comments about a 40% discount for First Homes where it is commercially viable to do so. This approach would reflect the findings in the HNA.

7.56 Martin Grant Homes comments that the settlements of Melksham and Berryfield are joined in physical and visual terms, and the settlement boundary of Melksham should be updated to reflect the settlement boundary on the ground. I have noted these comments. However, they relate more to Policy 19 Green Wedges than to this policy (and which relies on the settlement boundaries in other plans). I address the relationship between Melksham and Berryfield in paragraphs 7.171-7.175 of this report.

7.57 Finally I recommend a modification to the second part of the policy to reflect WC's comments. The recommended modification will bring the clarity required by the NPPF and simplify its approach. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of each of the three dimensions of sustainable development.

Replace the second part of the policy with: 'Housing outside settlement boundaries will be managed in accordance with the adopted Development Plan and should meet evidenced local housing need.'

Replace the opening element of the third part of the policy with

'Development proposals for new housing should demonstrate how their housing types and tenures respond positively to meeting local needs, informed by the Melksham Neighbourhood Plan Area Housing Needs Assessment (2023), the Wiltshire Local Housing Needs Assessment, or any updates of these Assessments. As appropriate to their scale, nature and location, development proposals should respond positively to the following matters:'

Replace part 3 c of the policy with:

'addressing local issues of affordability and demand for affordable homes for first time buyers and local households on below average incomes, including providing First Homes housing through developer contribution at up to a 40% discount of the open market value (where it is commercially viable to do so);'

General comments on the site allocations

7.58 The Plan proposes the allocation of five sites for housing (Policies 7.1 to 7.5). The approach taken is underpinned by the Site Options and Assessment Report. Paragraphs 4.8.3 to 4.8.5 of the Plan advise that:

'Combining the information on available sites from the Wiltshire Council Strategic Housing and Economic Land Availability Assessment (SHELAA) and responses to a local call for sites undertaken created a long list of 109 potential site options. These were independently assessed by consultant AECOM employing a robust, logical two

stage methodology based on the Government's National Planning Practice Guidance) and the Locality Site Assessment Toolkit. This produced a list of 35 brownfield and greenfield sites at Melksham, Shaw and Whitley, Beanacre and Berryfield that they considered 'potentially suitable and feasible' for possible allocation in the (Plan).

The site selection process also included dialogue with landowners; had regard to locally specific circumstances; and considered how each site could address the housing requirements and the Neighbourhood Plan objectives. In addition, (the) site selections had to avoid conflict or duplication with greenfield sites being proposed for allocation by the emerging Wiltshire Local Plan.

Wiltshire Council, together with Melksham Town Council and Melksham Without Parish Council, have agreed a collaborative approach to coordinate Local Plan strategic allocation of greenfield sites with the sustainable brownfield-led approach to site allocations in the town (in the Plan).'

7.59 The Site Options and Assessment Report was published in June 2023. Paragraph 1.6 of the Report comments that its purpose is to produce a clear and evidence-based assessment as to whether the identified sites are suitable, available, and likely to be viable for the proposed use, and therefore appropriate for allocation in the Plan. It also advises that it includes a review of sites identified through the WC SHELAA to ensure all possible site options have been considered. The Report assesses the potential of 109 sites for residential development across the neighbourhood area.

7.60 The Report is based around three key stages of the assessment process as follows:

- Stage 1: Site Identification;
- Stage 2: Site Assessment Initial Sieving; and
- Stage 3: Site Assessment

Table 4-1 provides a Site Assessment summary. The final column of the table provides a 'traffic light rating' for each site, indicating whether the site is appropriate for allocation for housing (or solar farm) in the Plan. Red indicates the site is not appropriate for allocation through the Neighbourhood Plan and Green indicates the site is appropriate for allocation. Amber indicates the site is less suitable or may be appropriate for allocation through the Neighbourhood Plan if certain issues can be resolved or constraints mitigated.

7.61 The Report identifies a series of next steps for the QBs. It highlights the need for engagement with WC and the community to select sites for allocation in the Plan which best meet community needs and plan objectives from the shortlist of suitable and potentially suitable sites. It also comments that the site selection process should consider the findings from all evidence base studies, including the emerging Green Gap and Green Wedge assessment and the Melksham Design Guideline, to direct future development to the most appropriate, sustainable locations.

7.62 This approach is complemented by the findings of the Environmental Report. It continues the agreed approach of the emerging Local Plan considering strategic green field sites, and the emerging neighbourhood plan considering brownfield sites (and existing commitments on smaller greenfield sites).

7.63 In overlapping ways, developers and landowners raise a series of issues in relation to the site selection process as follows:

- WC cannot and will not in the immediate future be able to demonstrate that it can evidence a 5 Year Housing Land Supply consistent with the NPPF December 2024 due to the significant increases in housing delivery required;
- the Plan relies on extant planning permissions to deliver 270 homes;
- the Plan does not identify the location of the proposed allocations in the emerging Local Plan nor does it refer to the need for Melksham to provide future long-term growth beyond those allocations stated in the submitted Local Plan Policy 17;
- the housing requirement figure for the Melksham neighbourhood area of 270 dwellings is yet to be subject to formal scrutiny during the examination of the emerging Local Plan and remains untested at the current time. This is also true of the housing requirement of the emerging Local Plan in general;
- the December 2024 version of the NPPF brought about several substantial changes. These revisions have significant implications for the long-term strategic policy landscape within Wiltshire. Whilst the onus is on Wiltshire Council to coordinate an effective strategic plan for the county, the recent changes to the NPPF will have implications for the Plan;
- while the allocation of vacant brownfield sites in the Plan within Melksham is laudable, brownfield sites are inherently difficult to deliver, and their regeneration requires specialist expertise and funding. A range and mix of sites including brownfield and greenfield sites would ensure the delivery of a range and mix of housing products, including the delivery of affordable housing for Melksham;
- progression of the Plan should immediately be put on hold to ensure firstly that a fair and reasonable assessment of sites can be undertaken and secondly to ensure that the Plan contributes to the objectives of the 2024 NPPF and in particular to deliver more housing rather than being expedited in order to rely on contributing towards outdated minimum housing targets across Wiltshire that the Councils have significantly under delivered against to such an extent that Wiltshire now has a land supply of slightly over 2 years (Wiltshire Council Briefing Note 17.12.24 identifying a land supply of 2.03 years); and
- progress on the Plan has now advanced quicker than progress on the Local Plan Review and the QBs working towards the Plan being ‘made’ ahead of the adoption of the Local Plan and the consequent ‘fixing’ of its policies.

7.64 I have considered these matters very carefully. On the balance of the evidence, I am satisfied in general terms that the matter has been carefully managed in accordance with Planning practice guidance (ID:41-009-20190509) which advises that where a neighbourhood plan is brought forward before an up-to-date local plan is in place the qualifying body and the local planning authority should discuss and aim to agree the relationship between policies in the emerging neighbourhood plan, the emerging local plan, and the adopted development plan with appropriate regard to national policy and guidance. In this context, the agreed approach between WC and the QBs is best

practice. In addition, the Site Selection Report is comprehensive and addresses 109 sites. The Environmental Report is similarly comprehensive.

7.65 I have also considered carefully the various comments about the current positions of the submitted Local Plan and the submitted Neighbourhood Plan. I have also noted the overlapping comments about the December 2024 update to the NPPF. Plainly the examination of the neighbourhood plan is taking place at a time when both national and local planning policy is changing. Whilst this produces challenges on the one hand, it does not prevent development plans from coming forward and being examined. The transitional arrangements in the 2024 version of the NPPF provide the context for the examination of development plans, and in the case of the examination of the neighbourhood plan as addressed in Section 3 of this report. In this context there is no reason to delay the examination of the Plan.

7.66 Nevertheless I recommend in paragraphs 7.186 and 7.187 of this report that the QBs assess the need or otherwise for a further review of the Plan within six months of the adoption of the emerging Local Plan. This reflects the order in which the two plans will have been examined rather than a criticism of the wider process.

7.67 I have also noted the various comments about the Plan period. However, given the complementary approaches which have been taken for the Local Plan and the Neighbourhood Plan, and with the safeguard of the potential for a further review of the neighbourhood plan, I am satisfied that a Plan period of 2038 is entirely appropriate. Indeed, having a much more limited Plan period which relates to the adopted Wiltshire Core Strategy would not respond positively to the general principle in Planning practice guidance (ID:41-001-20190509) that 'neighbourhood planning provides a powerful set of tools for local people to plan for the types of development to meet their community's needs and where the ambition of the neighbourhood is aligned with the strategic needs and priorities of the wider local area.' Plainly the strategic needs and priorities of the wider local area are now captured in the submitted Local Plan.

7.68 I note the comments made on the supply of housing land in the County. However, this is an issue which WC is seeking to address both generally and in the emerging Local Plan. The recommended mechanism in this report for the potential for a further review of the Neighbourhood Plan will address any need for a revision on the housing requirement for the neighbourhood area should this arise as an outcome of the examination of the Local Plan.

7.69 I sought WC's comments on the extent to which it is satisfied that it appropriate for the homes allocated in Policies 7.3 and 7.5 of the submitted Plan can be counted against the strategic requirement for the neighbourhood plan to deliver 270 homes. In its response to the clarification note, it advised that it is satisfied that it is appropriate for the homes allocated in Policies 7.3 and 7.5 of the submitted Plan to be counted against the strategic requirement. It also comments that Policy 7.3 has not been carried forward from the made Plan and is a new policy. It also advises that the Policy 7.5 site allocation has been increased from 18 dwellings to 55 dwellings and that there is a current planning application awaiting decision on part of this site for up to 22 dwellings.

7.70 In this overall context I comment on the five allocated sites (Policies 7.1 to 7.5) in turn in the following sections of this report.

Policy 7.1: Land at Cooper Tires

7.71 This is a new policy. The supporting text advises that the 12.8-hectare Cooper Tires main factory site is immediately to the west of the town centre and bank of the River Avon, and is bordered by Bath Road, Scotland Road and the A350. The allocation includes the small "Bakers Yard" car park to the west side of Bath Road and the car park to the north of Scotland Road. The Plan advises that the site has a long industrial heritage and produced tyres from the 1890s, and was one of Melksham's most important employers until it closed at the end of 2023. The whole site is now vacant.

7.72 The Plan advises that community engagement has demonstrated that allocation of the site for regeneration is supported by the community, its owners and by WC and that it has adopted a proactive and positive approach to planning for the future of the site through its allocation.

7.73 The Plan advises that the owners of the site have made it available for allocation within the Plan period, have confirmed site availability, and have provided a suite of assessment evidence. In addition, the intentions of a potential new owner to progress master planning and applications for the redevelopment of the site are captured in a representation to the Plan.

7.74 The supporting text comments that the site is highly sustainable brownfield land, within easy walking and cycling reach of the town centre, convenience stores, King George V Recreation Ground and the Campus leisure and library facilities. It is also well connected to Melksham railway station and regular bus services to surrounding towns. The Plan also advises that the regeneration of the site delivers on nearly all the Neighbourhood Plan's sustainable development, environmental, housing, economic and wellbeing objectives. It also comments that it can renew its vitality in a distinct urban neighbourhood of high-quality homes, mixed commercial, recreational, cultural and some retail uses.

7.75 Due to the complexity associated with this allocation, the evidence base report provides both greater detail on how the Plan's objectives and policies will be realised in the site regeneration and additional details that underpin the allocation. The package of documents includes:

- a viability report (and an addendum);
- a Capacity Assessment; and
- a series of due diligence documents.

7.76 The supporting text acknowledges the potential challenges associated with the redevelopment of the site. Paragraph 4.8.22 advises that the site is significantly constrained by flood risk (Zones 2 and 3) and contamination and that this restricts the land readily available for residential development to about 25% of the site and increases remediation costs that challenge the viable regeneration of the site. In this context, paragraph 4.8.23 advises that development of the site must address site-wide

flood issues and mitigation measures, de-contamination, and infrastructure provision, and in accordance with a comprehensive master plan and delivery strategy.

7.77 Paragraph 4.8.24 then advises that the regeneration of the site is likely to commence later in the Plan period and extend beyond 2038. Initial residential-led phases, generating value on less constrained parts of the site are considered feasible and viable for delivery by 2038. The allocation therefore advises about an expectation for development of approximately 100 dwellings on land within Flood Zone 1 up to 2038. In addition, it supports further residential development where this enables delivery of viable mixed-use regeneration on the site.

7.78 BXB Limited (in its capacity as a prospective purchaser of the site) comments on the policy as follows:

'In progressing the proposed acquisition of the Cooper Tires site, BXB continue to carefully consider the nature of the Site and its potential and are ambitious for its future and the contribution it can make to Melksham and its community.

At this stage, BXB, broadly concur with the vision for the Site set out in the draft Neighbourhood Plan of a mixed scheme reflecting the heritage assets on the site and its attractive, riverside location. BXB would also expect to bring the site forward within a flexible masterplan framework.

However, given the complexities and costs that will be associated with bringing forward development on this key Site it is important to match ambition with pragmatism, to ensure viability and deliverability. It is increasingly clear to BXB that the master planning strategy, prepared in consultation with stakeholders and in the context of the Neighbourhood Plan, the Wiltshire Local Plan and the recently updated NPPF (December 2024) will be key vehicle to consider the most appropriate, viable options for the site and that it may be premature to be definitive on the mix of uses proposed.

As noted previously, BXB currently envisage submitting a hybrid application for the Site (i.e. outline, with detail for the heritage and some other elements) within the context of a masterplan framework and illustrative masterplan prepared in consultation with stakeholders and in the light of public consultation. A pre-application submission will be made to Wiltshire Council and we would hope that the Town Council would be open to direct engagement in the development of the master planning strategy. This approach will establish the mix and capacity of the site and development costs and viability as well as the approach to access, flood management, green infrastructure, and biodiversity. It will also establish the key design principles. BXB Ltd consider that policy supporting the redevelopment of the Cooper Tires site should reflect this approach.'

7.79 WC comment that the Plan's recognition of the importance of securing the comprehensive regeneration of this complex and important riverside site and the ongoing dialogue is welcomed. It also suggests a series of detailed revisions to the policy.

7.80 Robert Hitchins Ltd comments on the policy as follows:

'the site has flood risk, contamination, and heritage constraints, plus the emerging policy seeks to deliver new high quality public realm including access to the riverside plus the retention of two existing buildings for community purposes. All these factors will impact on the viability of a scheme for the site and the likelihood of a viable scheme for a scheme that only delivers 'at least 150 dwellings', including both open market and affordable homes being delivered.'

7.81 The Environment Agency comments that:

'It appears that a sequential test has been undertaken in the Site Allocations Topic Paper, however we note that the proposed 100 dwellings according to the supporting text are to be located within Flood Zone 1. We ask that the policy wording itself is updated to state that the allocated dwellings will be located within Flood Zone 1 for clarity.'

7.82 Historic England notes that there is now a more detailed proposal for the Cooper Tires site with specific quanta of development being promoted. It also comments about the relationship of housing development to Flood Zone 1.

7.83 Overlapping comments have been made on the policy by Robert Hitchins Limited, Catesby Estates Limited, and Waddeton Park Limited about the deliverability and viability of the site on the following matters:

- the site's availability for development;
- flood risk constraints; and
- viability issues (both generally and given the policy's expectations for developer contributions as set out in criterion 20).

7.84 I have noted the comments from BXB Limited and from other organisations. I also note that the supporting text comments openly about the constraints on the development of the site. In this context I sought advice from the QBs about the availability of the site and progress on a planning application. In its response the QBs advised that:

'In progressing the allocation of land at Cooper Tires, the qualifying bodies have listened to and acknowledged the challenges delivering the re-use and regeneration of this site present. But in listening to the community at informal and formal stages of engagement, it recognises the expressed wishes of local people for the JMNP to take a positive role in enabling it, especially where Wiltshire Council's Local Plan has not.

The depth of analysis and evidence obtained through engagement with the owners of the site and through analysis undertaken by JMNP2, together with an informed and proportionate commitment to housing delivery on flood zone 1 land provides Wiltshire Council and statutory consultees with the evidence to support the allocation.

The ongoing dialogue with and positive responses to dialogue and representations made by owners' agents has maintained their support of the allocation and its criteria through a marketing process that is now close to securing a new owner who maintains support for JMNP2. It is known there remains much further work to be done, but the

qualifying bodies have justified confidence that BXB will be progressing development proposals that have a realistic and viable likelihood of delivering the allocated land uses by 2038.

In addition to its supportive Regulation16 representation and update, BXB's agent Nexus Planning have given this update on 07/03/25 - BXB are continuing discussions with the landowner of the site and subject to those, intend to submit a planning application, of course following engagement with the local planning authority, the Town Council, the local community, and others at the earliest opportunity.'

7.85 I have considered the policy, the various technical appendices and the comments received very carefully. In general terms the QBs have addressed the redevelopment of the site in a very comprehensive way which recognises both its opportunities and the challenges. As the Plan comments, the site is very accessible and sustainable. Within the context of a sustainable masterplan which addresses flood risk issues and commercial viability it has the potential to contribute to the local delivery of sustainable development. In addition, I note that neither WC nor the Environment Agency raise any in principle objections to the proposed allocation.

7.86 In addition I am satisfied that the approach taken has regard to national policy on the use of brownfield land as set out in paragraphs123-125 of the NPPF. Furthermore, the government is now consulting on the Brownfield Passport (13 February 2025) and inviting views on further action that could be taken through the planning system to support the development of brownfield land in urban areas.

7.87 I have noted the comments raised by the development industry about the technical and viability issues associated with the site. Plainly its development will be more complicated than the development of greenfield sites in general, those proposed by WC in its submitted LP and those highlighted in the representations received to the Plan. Nevertheless, such challenges should not necessarily be used to prevent the site from being allocated in the Plan. In addition, I have given appropriate weight to the detailed assessments undertaken by the QBs and the support for the policy approach offered by BXB (as a potential purchaser of the site). In any event the allocation of the site is part of a wider proposed package of growth in the neighbourhood area as set out in the submitted Plan and in the submitted Local Plan.

7.88 I am also satisfied that the policy is appropriately detailed and structured. It advises about the need for a single comprehensive masterplan, phasing and delivery strategy for the development, and its opening element comments about the anticipated mix of uses. Thereafter the detailed criteria provide an appropriate level of detail on a range of matters. Criterion 20 comments about the potential need for developer contributions. However, it properly advises that the level of contribution sought will be considered in the context of site viability and other relevant considerations, including deliverability.

7.89 The first part of the policy comments about the delivery of a mix of uses incorporating approximately 100 dwellings to include affordable housing subject to viability to be provided within the Plan period. Whilst the supporting text advises that housing should be delivered in the part of the site which is within Zone 1, I recommend that the policy also provides this clarity. This will ensure that the policy responds positively to the

comments made by the Environment Agency, and has regard to Section 14 of the NPPF.

7.90 BXB Limited suggest a series of revisions to the policy. In essence, the revisions seek to retain a degree of flexibility about the overall package of development proposals on the site. This approach has merit, and I recommend modifications to the second part of the policy (on the masterplan) so that it will play a part in defining the exact mix of uses on the site. Nevertheless, I am satisfied that the package of uses set out in the opening part of the policy is both justified and appropriate. It provides both a context to the overall policy and clarity to the development industry and to persons living around the site.

7.91 I also recommend modifications to the ninth and tenth criteria based on the comments from WC. In both cases they will bring the clarity required by the NPPF and will allow WC to implement the detailed elements through the development management process. The recommended modification to the ninth criterion acknowledges that the development of the site may span over several years, and that technical guidelines and best practice may change.

7.92 In the context of the challenges involved in the delivery of the site I recommend that it is highlighted in a new section in the Plan on monitoring and review (as addressed in paragraphs 7.186 and 7.187 of this report).

7.93 Otherwise the policy meets the basic conditions. It will contribute to the delivery of each of the three dimensions of sustainable development.

In the first part of the policy replace a) with:

'approximately 100 dwellings in the part of the overall site which is within Flood Zone 1 (and to include affordable housing subject to commercial viability) within the Plan period. Further housing will be supported in the context of a comprehensive masterplan for the site which addresses key policies and constraints, including flood risk.'

Replace the second part of the policy with:

'A single comprehensive masterplan, phasing and delivery strategy for the development should be prepared, and approved by the local planning authority, as part of, or in advance of any planning application being submitted for the whole or part of the allocated site. Detailed planning applications should be in accordance with the approved masterplan. The masterplan and planning proposals should be prepared in the context of this Plan, the Wiltshire Local Plan and national planning policy, and with early pre-application consultation with the local community. The masterplan should define the appropriate mix of uses on the site.'

Replace the third criterion with: 'Investigate the presence and significance of archaeological remains in line with an initial desk based archaeological assessment.'

In the ninth criterion replace 'Buildings for a Healthy Life (Homes England)' with 'Buildings for a Healthy Life (Homes England), or any subsequent revision'

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

Policy 7.2: Land at the Former Melksham Library Site

7.94 This is a new policy. The supporting text advises that the site is around 0.65 hectares and is previously developed land located on the eastern edge of the town centre. The whole site is owned by Wiltshire Council and comprises the site of the former and vacant library and attached restaurant building, the vacant Further Education building, Lowbourne House, and the associated 66 space Lowbourne public car park to the east.

7.95 The Plan also advises that the site is within Melksham Conservation Area. However, it advises that the remaining building, Lowbourne House, is not listed or identified as a non-designated heritage asset. The supporting text also comments that the mature trees which line the eastern boundary of the car park site contribute to the character of the conservation area and are protected.

7.96 Furthermore the Plan comments that the existing public car park has been declared surplus to requirements by WC. A car parking study commissioned by the QBs observed the 66-space car park to have a 19% occupancy during surveys, the lowest in the town centre. The parking survey and future parking demand analysis showed a surplus of parking within Melksham town centre overall. On this basis the Plan concludes that the loss of the Lowbourne Car Park will not adversely impact on the vitality of the town centre.

7.97 I looked carefully at the proposed site during the visit. I saw its condition, the remaining building, and its proximity to the town centre. I am satisfied that a sensitive development can be accommodated on the site. I am also satisfied that the policy takes a comprehensive and robust approach to setting a context within which development can proceed.

7.98 WC comments on the wording of the tenth criterion of the policy. I recommend modifications to bring the clarity required by the NPPF and allow the policy to be appropriately applied through the development management process. Historic England comments about the need for the development to proceed based on advice from WC's Heritage Team. In the absence of any comments from WC on this matter, I am satisfied that the policy has been appropriately prepared, and can be sensitively implemented through the development management process.

7.99 Robert Hitchins Ltd comments on the policy as follows:

'it is...unclear whether the allocation… is deliverable and whether there is any market interest in delivering the site for extra care or a residential care home as stated in the

policy. This is particularly the case following the grant of outline planning permission at appeal in November 2023 for development including a 70-bed care home at Site 1025; Land South of Western Way.'

7.100 I have noted this comment very carefully. However, I saw during the visit that most of the site had been cleared. I note the commentary in the supporting text about the viability of the development of the site. I also note in the QB's response to this representation that it has received a letter from WC advising that it has entered a contract with EG Carter Ltd to design and build this development and that EG Carter have started work on the project and intend to submit a planning application in late summer 2025 with a view to starting construction in April 2026 (with an estimated completion date of October 2027).

7.101 In the round, I am satisfied that the redevelopment of the site will contribute to the local delivery of sustainable development in Melksham. It is centrally located adjacent to the town centre. The criteria in the policy provide a sensitive and robust context within which the site can be developed.

7.102 With the revision to the tenth criterion, and to the wording which precedes the various criteria, I am satisfied that the policy meets the basic conditions. It will contribute to the delivery of each of the three dimensions of sustainable development.

Replace 'Development proposals for the site will:' with 'Development proposals for the site should:'

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

Policy 7.3: Land South of Western Way, Bowerhill

7.103 This is a new policy. The Plan comments that the 10.25-hectare greenfield site located to the south of Melksham, north-west of Bowerhill and east of Berryfield has been made available for allocation in the Plan. It advises that in 2023 outline planning permission was granted on appeal and established the principle for development of 210 dwellings and a 70-bed care home, with vehicle access from Maitland Place. It also comments that further reserved matters planning consents will be required to establish the precise layout, housing mix and design of the development.

7.104 The Plan advises that the allocation addresses these new circumstances to ensure the development of the site is both managed to protect the amenity of neighbouring residents and employers, and to secure optimum benefits for the community.

7.105 In the round, I am satisfied that the development of the site will contribute to the local delivery of sustainable development in Melksham. Whilst outline planning permission has been granted, the development has yet to begin. Furthermore, the criteria in the policy provide a sensitive and robust context within which the site can be developed.

7.106 WC makes detailed comment on the policy which I recommend as a modification. It will bring the clarity required by the NPPF and allow the policy to be appropriately applied through the development management process. It will also ensure consistency across the allocation policies. I also recommend that the element on the policy on pre-application discussions is deleted. The matter is already adequately addressed in Policy 5 of the Plan. This approach will also ensure that the Plan is internally consistent. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of each of the three dimensions of sustainable development.

Delete 'Proposals should be prepared with early pre-application consultation.'

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

Policy 7.4: Land at Whitley Farm, Whitley

7.107 This is a new policy. The Plan comments that the 1.6-hectare site is located off First Lane, adjacent to the built-up area and settlement boundary of Whitley and near local services. The site includes the listed Whitley Farmhouse and barn adjacent to a farmyard with twentieth-century agricultural structures in poor condition that extend back into the neighbouring field.

7.108 The Plan advises that the site owners have stated that changes in farming operations within its estate have resulted in Whitley Farm, and its buildings and structures, becoming obsolete in some cases and under-used in terms of a working farm.

7.109 I looked carefully at the proposed site during the visit. I saw its condition, its historic buildings, and its proximity to the remainder of Whitley. I am satisfied that a sensitive development can be accommodated on the site. I am also satisfied that the policy takes a comprehensive and robust approach to setting a context within which development on the site can proceed.

7.110 WC make a series of detailed comments on the policy which I recommend as modifications. They will bring the clarity required by the NPPF and allow the policy to be appropriately applied through the development management process. I also recommend a modification to the supporting text to acknowledge that the development of the site may include several uses. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of each of the three dimensions of sustainable development.

Replace the ninth criterion with: 'With regard to any residential development which may be proposed, provide a high standard of residential amenity and wellbeing by achieving design principles contained within recognised design guidance including "Buildings for a Healthy Life" (Homes England)'

Replace the tenth criterion with: 'Address climate change through mitigation and adaptation and contribute to Wiltshire Council's carbon neutrality ambitions by

including a significant use of low-carbon and renewable energy technologies, the re-use of the existing built fabric, and the application of the energy hierarchy.'

In paragraph 4.8.43 delete 'residential'

Policy 7.5: Land at Middle Farm

7.111 This is a modified policy. The Plan advises that it updates and extends an existing allocation in the made Plan and proposes more houses over a larger area. The made Plan allocated 1.6 hectares of land at Middle Farm (Plot A) for development of about 18 dwellings immediately to the north east of Whitley settlement boundary. That allocation is proposed to be updated with a new allocation site of around 3 hectares. This incorporates all the previously allocated 1.6 hectares of land (Plot A) and adds approximately 1.5-hectare area to its east (western part of Plot B). The allocation provides capacity for approximately 55 dwellings and 1 hectare of buffer landscape and open space.

7.112 The supporting text comments that the overall allocated area has been defined to minimise landscape and visual impacts and that a third of the site is to be retained as green infrastructure and buffer landscape. It goes on to advise that this approach will significantly reduce the extent of housing development and soften views from the countryside, also strengthening the visual separation between Whitley and the nearby electricity sub-station and provide enhanced biodiversity and amenity for residents.

7.113 The Plan advises that the site is well-located to enable walking and cycling to local facilities and public transport stops and will utilise a single access point onto Corsham Road, together with providing new pedestrian facilities on the busy road as part of the allocation requirements.

7.114 I looked carefully at the proposed site during the visit. I saw its position in relation to the wider village and to the agricultural land to the east. I am satisfied that a sensitive development can be accommodated on the site. As with the previous policy, I am also satisfied that the policy takes a comprehensive and robust approach to setting a context within which development can proceed.

7.115 WC make a series of detailed comments on the policy which I recommend as modifications. They will bring the clarity required by the NPPF and allow the policy to be appropriately applied through the development management process. I also recommend that the element on the policy on pre-application discussions is deleted. The matter is already adequately addressed in Policy 5 of the Plan. This approach will also ensure that the Plan is internally consistent.

7.116 Otherwise, the policy meets the basic conditions. It will contribute to the delivery of each of the three dimensions of sustainable development.

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

Delete 'Proposals should be prepared with early pre-application consultation.'

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

Policy 8: Infrastructure Phasing and Priorities

7.117 This policy remains unchanged. The Plan advises that residents made it clear that they felt it important that new housing developments should be delivered in Melksham alongside the necessary services and facilities, such as healthcare, education, green spaces, and transport infrastructure. The policy acknowledges the importance of housing proposals providing appropriate and timely infrastructure and the views of the community.

7.118 I recommend that the first part of the policy is recast so that it more closely sets out its ambitions and removes unnecessary supporting commentary.

7.119 I also recommend the deletion of the second part of the policy on the mechanisms which will be used to generate infrastructure. It is a statement of fact rather than a land use planning policy. In addition, the matter is already comprehensively addressed in the supporting text. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of each of the three dimensions of sustainable development.

Replace the policy with:

'Development proposals for housing development should consider, assess, and address their necessary infrastructure requirements and, insofar as they relate to matters within the applicant's control, schedule any related programmes of work in co-ordination with the housing development to deliver infrastructure in a timely fashion.'

Policy 9: Town Centre

7.120 This is a modified policy. The Plan advises that the policy has been updated to refer to the evidence base material (Town Centre Master Plan Report 2023) and to introduce a new clause that references that document and its priority aims. A final paragraph has also been added and it references an updated map.

7.121 The Melksham Town 2020-2036 Scoping Report 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, and there has been improvement to the area in front of the Town Hall, no other recent improvement works have taken place.

7.122 As part of the commitment to maintaining and enhancing the town centre, the Town Council has prepared a master plan for the town centre, including areas for potential expansion that will inform future development opportunities. The Plan advises that

Melksham's priority must be to hold onto, and maintain, the core town centre offer to retain an important sense of place and arrival.

7.123 I looked at the Town Centre carefully during the visit. I am satisfied that the policy takes a positive and flexible approach towards its future and has regard to Section 7 of the NPPF. The supporting text helpfully describes the local circumstances which have underpinned the approach taken. Within this broader context I recommend the following series of modifications to bring the clarity required by the NPPF and to allow WC to be able to apply the policy through the development management process:

- revisions to criterion e to clarify its intentions in relation to other criteria and to define the area within which it will operate;
- revisions to criterion f so that it flows more naturally from the opening element of the policy; and
- revisions to criterion g so that the commentary about the uses of upper floors applies where relevant, and that it refers to 'productive use' rather than 'greater use'

7.124 Otherwise, the policy meets the basic conditions. It will contribute to the delivery of each of the three dimensions of sustainable development.

In criterion e replace 'the above' with 'criteria a-d' and 'Commercial Area' with the 'town centre area'

In criterion f delete 'where they'

In g replace 'greater use' with 'where relevant, productive use'

Policy 10: Employment Sites

7.125 This is a modified policy. The Plan advises that the policy has been updated to remove the final sentence of the first paragraph. The Plan comments that the level of out-commuting to neighbouring towns and to jobs along the M4 corridor is high, and community engagement confirms that people want to work closer to their homes.

7.126 The Plan also advises that emerging Local Plan Policy 64 (Additional Employment Land) sets out the updated employment land strategy to balance employment and economic growth and that it proposes five hectares of new employment land within the strategic allocation on land east of Melksham. It also comments that Policy 64 is also supportive of employment development on unallocated sites adjacent to Melksham as a Market Town where they are appropriate to the role and function of the settlement and certain criteria are met.

7.127 In general terms I am satisfied that this is a good policy. It has regard to Sections 6 and 11 of the NPPF in general, and recognises the importance of recycling brownfield land. Within this broader context I recommend that the policy is replaced so that it has the clarity required by the NPPF and to allow WC to implement its contents through the development management system and address the following matters:

- the removal of the unnecessary use of 'in principle' in the first part of the policy. Any such proposals will be assessed against other relevant development plan policies; and
- an acknowledgement that the approach for the replacement of jobs (and/or their status) may not always be practicable.

7.128 I also recommend consequential additions to the supporting text. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of each of the three dimensions of sustainable development.

Replace the policy with:

'Proposals for the retention, intensification and reuse of previously developed employment land will be supported, particularly where they provide space for start-up and small businesses and introduce a range of new employment opportunities.

Except where sites are allocated for alternative uses by this Plan, development proposals should generate the same number, or more, permanent full time equivalent jobs as the existing or former use wherever this approach is practicable.'

At the end of paragraph 4.10.8 add: 'Policy 10 seeks to address these various matters and recycle brownfield land for employment development. It advises that proposals should generate the same number, or more, permanent full time equivalent jobs as the existing or former use wherever this approach is practicable. Nevertheless, the Plan recognises that a flexible approach will be necessary on this matter throughout the Plan period. This acknowledges that proposals for high-value employment uses with different employment levels than the former uses may make an equal or greater contribution to the well-being of the neighbourhood area.'

Policy 11: Sustainable Transport and Active Travel

7.129 This is a modified policy. The Plan advises that it has been updated slightly to remove reference to the Wiltshire Core Strategy policy.

7.130 The Plan comments that the QBs want to see more opportunities to get around the town and the parish without using a private vehicle. It also advises that accessible, safe, and attractive infrastructure that promotes and enables walking, various wheeling modes such as bicycles and scooters and public transport choices for local journeys through the town and parish to key locations such as schools, health and community facilities, green spaces and employment are important.

7.131 The policy has two related parts. The first comments that developments must be planned in line with the Sustainable Transport Hierarchy, including provision for ultra-low emission vehicles. The second offers support for proposals would achieve further improvements to the accessibility and quality of the links between the wider town and Melksham railway station. I noted the relationship between the town centre and the railway station during the visit.

7.132 In general terms the policy takes a positive and flexible approach to this matter and has regard to Sections 8 and 9 of the NPPF. I recommend that the first part of the policy is slightly recast so that the wording used more clearly sets out its intentions. I also recommend that the recasting incorporates a proportionate element. This will avoid it having an unnecessary and disproportionate impact on minor and domestic proposals.

7.133 I am satisfied that the second part of the policy meets the basic conditions.

7.134 Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace the first part of the policy with:

'As appropriate to their scale, nature and location, development proposals should complement the Sustainable Transport Hierarchy, including provision for ultra-low emission vehicles. Proposals for major development should demonstrate through a proportionate Travel Plan how sustainable transport modes are maximised and that safe and suitable movement can be achieved for all people.'

Policy 12: Green and Blue Infrastructure

7.135 This is a modified policy. The Plan advises that it has been updated to refer to blue as well as green infrastructure. A diagrammatic representation of green and blue infrastructure assets and their connectivity potential is shown in figure 12 and is detailed in the Evidence Base Report. The report identifies local elements of green and blue infrastructure with the aim of linking local sites and delivering connectivity of assets between and within different parts of the neighbourhood area.

7.136 The Environment Agency welcome the inclusion of blue infrastructure within the policy.

7.137 Martin Grant Homes comments that it is unclear as to why the Melksham Canal Link Project features in Figure 12 in relation to this policy and that the scheme is not deliverable, as demonstrated by the historic planning application (from 2012), which has not been progressed and remains subject to major objections from statutory consultees. Further it is not viable and does not have the support of the landowner. There is no information with respect to how this scheme can be delivered and it should be deleted from the Plan.

7.138 The Plan advises that the Canal Link Project is:

'a key priority for the Plan area GBI is the Melksham Link Project. The Wiltshire Core Strategy safeguards the route of the Melksham Link Canal in Core Policy 16. This policy safeguards the identified route (see Figure 12) for developing a canal link to the south west of the town between the Kennet & Avon Canal and the River Avon, and to the north east of the town between the River Avon and the historic alignment of the Wilts & Berks Canal. The project is an opportunity to improve the GBI network both within the Plan area and the wider Melksham Community Area, with associated benefits such as increased walking and cycling routes and linked to this is the

opportunity to promote tourism within the town, and to generate renewable energy, harnessing energy from the river.'

7.139 I have considered the policy and the information about the Canal Link Project very carefully. On the balance of the evidence, I am satisfied that there is no direct conflict between the two matters. It is perfectly appropriate for a neighbourhood plan to identify potentially important projects which impact on the neighbourhood area. In addition, the Project is being managed by a third party (the Wilts & Berks Canal Trust) and will find its own level within the Plan period. Nevertheless, I recommend that the second part of the policy is modified to include a proportionate element. This will acknowledge that individual proposals will have different impacts on the policy. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace the opening element of the second part of the policy with: 'As appropriate to their scale, nature and location, development proposals for major developments must:'

Policy 13: Biodiversity

7.140 This is a modified policy. The Plan advises that it has been updated in addition to the required 10% supporting a 20% uplift in Biodiversity Net Gain. The Plan comments that the neighbourhood area is host to a range of wildlife sites and features which support the overall wildlife network and contribute to the well-being of wildlife and residents alike. The resulting policy is wide-ranging and captures the national requirement for development proposals to deliver biodiversity net gain.

7.141 The policy takes a positive approach to this important matter. It also comments about the interface between development proposals and statutory and non-statutory nature conservation sites. In general terms I am satisfied that it has regard to Section 15 of the NPPF. Within this broad context I recommend the following modifications to bring the clarity required by the NPPF and to allow WC to be able to apply its contents through the development management process:

- a simplification of the first part of the policy;
- the deletion of the second part of the policy on the Biodiversity Metric. The issue is a process matter rather than a land use planning policy and is already adequately addressed in the supporting text. Nevertheless, I recommend a detailed modification to the wording of the supporting text;
- a simplification of the third part of the policy; and
- detailed technical revisions to the supporting text as suggested by WC.

7.142 Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace the policy with:

'Development proposals, including those for field based solar farms, should deliver at least a 10% improvement in biodiversity value within and, where appropriate, beyond the site to deliver tangible benefits for biodiversity,

including specific attention for protected species. Proposals which deliver a higher Biodiversity Net Gain will be particularly supported.

Where appropriate, development proposals should demonstrate sensitive responses to statutory and non-statutory nature conservation sites (as shown on Figure 13) such as accommodating a buffer zone.'

At the end of paragraph 4.13.2 add: 'Any development proposed within the 2km lesser horseshoe core area in the south eastern part of the neighbourhood area will need to comply with the Conservation of Habitats and Species Regulations 2017, as amended, through compliance with the Bat SAC Planning Guidance for Wiltshire 2015 (or latest iteration). In addition, a project level Habitat Regulations Assessment (HRA) may be required.'

In paragraph 4.13.3 delete the final two sentences.

At the end of paragraph 4.13.5 add: 'Plainly the biodiversity metric may be updated in the Plan period. For the purposes of Policy 13 the most up-to-date version of the biodiversity metric should be used.'

In paragraph 4.13.6 delete the final sentence.

Policy 14: Open Spaces

7.143 This policy remains unchanged from the made Plan. The Plan advises that the distinctive characteristic of the town is the open spaces which punctuate the built environment, meaning that most residents are within walking distance of some open space. This key positive feature contributes to community well-being. The policy seeks to retain open spaces and identifies two circumstances where their full or partial loss would be justified.

7.144 In general terms the policy takes a positive and flexible approach to this matter and has regard to Section 8 of the NPPF. I recommend that the policy is slightly recast so that the wording used more clearly sets out its intentions. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace the policy with:

'Development proposals that involve the whole or partial loss of an existing open space (other than the designated Local Green Spaces) should demonstrate through an assessment of open space provision, using the quantity and access standards for open space as set out by Wiltshire Council, that:

- **there is a surplus in the catchment area of the open space concerned beyond that required to meet both current and forecast need, and full consideration has been given to all functions that the open space performs; or**
- **a replacement open space (or an enhancement of the remainder of the existing site) provides a net benefit to the community in terms of the**

quantity, quality and accessibility of the open space including by walking and wheeling.'

Policy 15: Community Facilities

7.145 This policy remains unchanged from the made Plan. The Plan advises that the community facilities in the neighbourhood area are detailed in the Community Facilities Report. They are wide-ranging and include community centres, public houses, cultural centres and venues, places of worship, education establishments and training centres and childcare facilities, health and social care facilities, sport and recreation facilities and civic and administrative facilities.

7.146 The Plan advises that the policy supplements the Local Plan by identifying the key local facilities and services (as identified in the Community Facilities Report) with the aim of retaining them unless it can be demonstrated that there is no longer a need or where alternative provision is made.

7.147 The policy is commendably comprehensive and includes the following three key elements:

- a policy context to safeguard the identified community facilities in the Community Facilities Report;
- offering support for new community facilities; and
- guidance on the location of new or replacement facilities.

7.148 The policy properly captures the importance of community facilities in the neighbourhood area. It properly acknowledges that it may not be economically viable, feasible or practicable to retain the identified community facilities throughout the Plan period. In this overall context, I am satisfied that the policy has regard to Section 8 of the NPPF and meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Policy 16: Local Green Spaces

7.149 This is a new policy. The Plan advises that interactive online community outreach to identify potential Local Green Spaces (LGS) nominations was undertaken during May and June 2022. This was supplemented by an opportunity to validate or add nominations at community drop-in events and online consultation during February and March 2023. From around 150 suggestions from the first community consultation, a working group assessed potential sites to determine which sites were considered to meet the criteria. It also comments that the package of proposed LGSs is informed by community input and landowner feedback.

7.150 The Plan proposes the designation of 49 LGSs. A full explanation of the methodology, evidence, and justification to support the designations, along with maps of each LGS is provided in the Local Green Spaces Evidence Base Report.

7.151 I looked at a selection of the proposed LGSs during the visit. I saw their different uses and sizes and the contributions which they made to the wider environment of the neighbourhood area.

7.152 Martin Grant Homes suggests that the number of LGSs is excessive for the neighbourhood area and that the approach taken by the QBs is negative and designed to prevent development from coming forward in the Plan period. I have considered this matter very carefully. On the one hand, the proposed schedule of LGSs is extensive. However, on the other hand, the neighbourhood area includes a town and several rural villages all of which include a variety of green spaces. In addition, the LGS Evidence Report shows due diligence in assessing each proposed LGS against the relevant criteria in the NPPF. Finally, the NPPF and relevant sections of Planning practice guidance require that any proposed LGS is assessed in turn rather than specifying that their overall number is controlled or managed. In these circumstances I have assessed the LGSs on their merits.

7.153 Gladman Developments Limited suggest that LGS 27 Brabazon Way does not meet the criteria for LGS designation in the NPPF. I looked at the proposed LGS carefully and am satisfied that it meets the criteria in paragraphs 105 and 106 of the NPPF.

7.154 NHS Property Services Limited comment about the proposed LGS at the Old Sports pitch off Campion Drive (LGS20). In their response to the clarification note, the QBs acknowledged that the extent of the LGS needs to be revised to that now shown in the LGS Evidence Base Report (September 2024). I recommend accordingly.

7.155 The policy element seeks to provide a local iteration of paragraph 107 of the NPPF. However, it does so in a confusing way. I recommend that this matter is remedied by a modification to the policy so that it takes the matter-of-fact approach as used in the NPPF. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace the policy with:

‘The sites shown on figure 15, and listed on page 95, are designated as Local Green Spaces.

Development proposals within the identified LGSs will only be supported in very special circumstances.’

Revise the boundary of LGS 20 so that it corresponds with that in the Evidence Base Report.

Policy 17: Trees and Hedgerows

7.156 This is a modified policy. The first two parts are unchanged. The Plan advises that the third part of the policy has been updated to reflect best practice and guidance updated for tree canopy coverage targets in relation to current levels in the neighbourhood area.

7.157 The supporting text comments that both greenfield and previously developed sites are likely to contain trees and hedgerows that, if retained, can make a positive contribution to the character of new development. The text also advises that the retention of key trees can influence both the design and layout of the development, and arrangements for their protection should be made during the construction phase.

7.158 The resulting policy is comprehensive in its nature.

7.159 Robert Hitchins Ltd comments that the requirements of the third part of the policy on tree canopy are unreasonable and the Plan should focus on appropriate tree planting for biodiversity net gain in suitable public open space and amenity area locations on a site rather than seeking a higher tree canopy coverage across a site including in gardens and on streets.

7.160 Martin Grant Homes also comments on the same matter. It advises that the policy may restrict making efficient use of land for new homes, and provides a notable risk to housing delivery within Wiltshire if the 8% target cannot be achieved and could act as a barrier to entry for many small and medium sized housebuilders. It concludes that the requirement is unjustified and unreasonable.

7.161 I have considered the third part of the policy and the comments received very carefully. On the one hand, the Plan's ambition to increase tree canopy cover on larger sites outside the town centre will have important environmental benefits. However, on the other hand, the mathematical approach taken is unsophisticated and is not directly underpinned by any detailed evidence about either the practicality of the proposed approach or its impact of the delivery of strategic housing requirement for the neighbourhood area. On the balance of the evidence, I recommend that the third part of the policy is modified so that it has a more general approach which can be applied where it is practicable to do so. I also recommend consequential modifications to the supporting text.

7.162 Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace the third part of the policy with:

'Wherever practicable, development proposals on sites outside of the town centre, and greater than 0.5 ha in size, should deliver an increase in site tree canopy cover. This should be demonstrated through a tree planting plan, and should be delivered through the retention of existing trees and /or the planting of new trees in public areas and in private gardens. Where this approach is not practicable, other green infrastructure features (such as green roofs) appropriate to the site should be provided.'

Replace paragraph 4.17.2 with:

'Overall tree canopy coverage in the area is estimated to be an average of just over 12% which has been mapped using the i-tree canopy tool. The Urban Forestry and Woodland Advisory Committee Network recommends a minimum standard for tree canopy cover is set for a local area. On this basis, Policy 17 comments that wherever practicable, development proposals on sites outside of the town centre, and greater than 0.5 ha in size, should deliver an increase in site tree canopy cover.'

Policy 18: Landscape Character

7.163 This is a modified policy. The Plan advises that it has been updated to include a further criterion with the aim of covering elements of landscape such as openness, tranquillity and amenity that have been raised through consultation responses. Key

characteristics of the landscape of the Plan area are set out in the Green Infrastructure Report and the Local Landscape Character Evidence Base Report which supplements the Landscape Character Assessment work undertaken by WC with local detail.

7.164 Martin Grant Homes comments that the third part of the policy could conflict with the approach taken in the emerging Local Plan. Whilst I note this comment, a neighbourhood plan is assessed against the strategic policies in the development plan and not against those in an emerging local plan.

7.165 In general terms, I am satisfied that the overall policy and the new criterion d respond positively to these matters and have regard to Section 15 of the NPPF. However, I recommend that the opening element of the policy is modified to include a proportionate element. This will acknowledge that individual proposals will have different impacts on the elements of the policy. This approach was agreed by the QBs in their response to the clarification note. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace the opening element of the policy with: 'As appropriate to their scale, nature, and location, development proposals will be expected to:'

Policy 19: Green Wedges

7.166 This is a new policy. The Plan comments that the Green Gap and Wedge Study provides landscape evidence to illustrate that Shaw, Whitley, Beanacre, Bowerhill, Berryfield and Melksham town each retain a unique character, history, and sense of place derived from their landscape settings as recognisably distinct built-up areas, distinguishable from other neighbouring settlements by intervening countryside. The Plan advises that the Study illustrates that the areas proposed to be designated as green wedges have been assessed as meeting three separate criteria and found to provide physical and perceptual separation between settlements in the neighbourhood area.

7.167 An addendum to the Study has been prepared to update information about a possible Green Wedge (Berryfield, Bowerhill and Melksham), that no longer fulfils designation criteria due to outline planning permission being granted at appeal, and amendment to another (Melksham and Berryfield), also as result of outline planning permission being granted at appeal.

7.168 I looked carefully at the proposed Green Wedges during the visit and noted their various land uses and relationship with built development. The range and type of Green Wedges reflects the character and size of the neighbourhood area – some relate to the relationship between Melksham and the historic villages in its hinterland (in Melksham Without parish), some relate to the relationship between Melksham and recent development in Berryfield and Bowerhill, some relate to the relationship between the separate historic villages, and one relates to the relationship between Berryfield and the adjoining parish of Semington (to the south).

7.169 WC comment that:

'The Green Wedge policy includes extensive areas of land next to defined settlement boundaries. This is a restrictive policy that could undermine the ability to bring forward appropriate sustainable land uses on the edge of settlements over the plan period. For example, the emerging Local Plan allows for new community facilities (Policy 81) and employment development (Policy 64) adjacent to settlement boundaries.

The proposed Green Wedges include land adjacent to Hampton Business Park Principal Employment Area – the 'Berryfield and Semington' Green Wedge. WCS Core Policy 34 'Additional employment land' allows for additional employment land to come forward adjacent to settlement boundaries to help retain or expand businesses. There is currently a shortage of land to meet the needs of local employers and as such these policies could restrict the sustainable expansion of established employment areas. As such there is particular concern about this area. This proposed Green Wedge also includes the headquarters and heliport of the Wiltshire and Bath Air Ambulance charity and these proposals could thwart any possible future expansion plans of this organisation.'

7.170 Martin Grant Homes comments:

'There is no justification for the introduction of a policy which, by intent, seeks to frustrate sustainable development opportunities from coming forward. This is clearly apparent from paragraphs 4.19.2 and 4.19.3. Sustainable development opportunities have come forward around the settlement of Melksham, either through the plan led approach or development management approach, as a consequence of a housing land supply shortfall. All proposals are judged under the presumption in favour of sustainable development, as set out in the NPPF. Seeking to add layers of policy designation to frustrate further opportunities for sustainable development, to help meet identified needs is contrary to the NPPF and to the basic conditions with respect to sustainable development.

….a green wedge is proposed to the south of Melksham, which has already merged and which has no particular local character, being of the same character as many parts of Melksham as confirmed at Figure 19 of the NP. It is non-sensical for the Green Wedge Study (page 73) to form the view that the A350 defines the southern edge of Melksham. It did in the past, but no longer does. Clearly, there is development extending southwards from Melksham, beyond the A350, both to the east and west of Semington Road.'

7.171 I have considered the policy, the Green Gap and Wedge Study, and the comments received very carefully. On the balance of the evidence, I am satisfied that it is a parish-based policy rather than a strategic policy (and which should therefore be addressed in the Local Plan). It is based on detailed research in the Green Wedges Study which comments both about the general concept of green wedges in neighbourhood plans elsewhere, and the proposed locations for such an approach locally. In addition, it has been prepared so that it is consistent with the housing allocations elsewhere in the Plan and in the submitted Local Plan.

7.172 The wording of the opening parts of the policy gives very clear guidance about its three overlapping purposes to provide long-term protection against coalescence, to protect the setting and separate identity of settlements, and to retain the existing settlement pattern by maintaining the openness of land. In general terms I am satisfied that the approach taken is appropriate to the neighbourhood area and reflects the relationship between the various settlements. Nevertheless, the identification of specific geographic areas is prescriptive in general, and in some cases results in the identification of substantial parcels of land which are larger than would be required either to provide long-term protection against coalescence or to protect the setting and separate identity of settlements. This matter is reinforced given that the Local Plan has not yet been examined and, as WC comment, the submitted policy could undermine the delivery of appropriate sustainable land uses on the edge of settlements over the Plan period.

7.173 In all the circumstances, I recommend that the first part of the policy is recast so that it identifies general rather than specific locations in the neighbourhood area where development proposals will be carefully managed to ensure the separation of the settlements concerned. In this broad context, the second part of the submitted policy forms an important element of the modified policy. In addition, the modified policy includes a final element that comments advising that development proposals which would result in the loss of or an unacceptable reduction of their openness and/or the contribution which the site concerned makes to the separation of the settlements concerned will not be supported.

7.174 I have also considered carefully the proposed Green Wedges in the submitted policy and the extent to which they should be more generally included in the modified policy. Based on all the evidence, I am satisfied that the proposed approach to the separation of settlements is appropriate between Whitley and Shaw, between Shaw and Melksham, between Beanacre and Melksham; and between Berryfield and Semington.

7.175 However I am not satisfied that the proposed approach to the separation of settlements is appropriate between Melksham and Berryfield, and between Bowerhill and Melksham. In coming to this judgement, I have concluded that the areas concerned are different in character and appearance from those listed in the previous paragraph of the report. They are parcels of land on the edge of the settlements concerned which have already coalesced elsewhere. In addition, they do not display the type of relationship which characterises the other separation of settlements areas which are based on the historic relationship between Melksham and the villages concerned, or between two villages. As such, I recommend that the two areas are not included in the modified policy. For clarity, this conclusion should be considered only in relation to the assessment of this policy against the basic conditions. It does not make any commentary on the potential for the development of these two parts of the neighbourhood area. Plainly any such proposals would be determined against relevant development plan policies, including Policy 6 of this Plan.

7.176 I recommend a series of consequential modifications to the supporting text and the deletion of Figure 17. I also recommend that the title of the policy is replaced with more generic wording which better describes the nature of the modified policy.

7.177 Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace the policy with:

'Separation of Settlements

Development proposals should respect the separation between the following settlements:

- **Whitley and Shaw;**
- **Shaw and Melksham;**
- **Beanacre and Melksham; and**
- **Berryfield and Semington.**

Proposals for development between the settlements listed above should:

a. be in conformity with development plan policies;

b. demonstrate that they would deliver economic, community and/or environmental benefits which would outweigh any harm to the role and function of the area between the two settlements (individually or cumulatively) as set out in section 1 of this policy, and as detailed in the Green Gap and Wedge Study (2023);

c. minimise and mitigate their urbanising effects, such as artificial lighting and traffic movements; and

d. where practicable, retain trees and hedgerows and, as appropriate to their scale and nature, incorporate additional screening trees and hedgerows as edge features to minimise the impact of development on the separation of the settlements concerned.

Development proposals which would result in the loss of, or an unacceptable reduction of the contribution which it makes to the separation of the settlements concerned will not be supported.'

Delete Figure 17.

Replace paragraph 4.19.4 with: 'As more development is accommodated in the neighbourhood area, the identification of areas of countryside outside settlement boundaries as areas of separation can help prevent (further) erosion of local character and identity arising from 'coalescence' or the merging together of places that were once separate. However, the need to balance appropriate sustainable land uses on the edge of settlements over the Plan period is acknowledged. For example, the emerging Local Plan allows for new community facilities (Policy 81) and employment development (Policy 64) adjacent to settlement boundaries where certain criteria are met. In the neighbourhood area, the need to balance any development (along with the benefits it will provide) on the settlement edge, with the issue of ensuring the ongoing separation of settlements, should be balanced by decision makers.'

Renumber the first paragraph 4.19 6 to read 4.19.5.

Replace paragraph 4.19.5 with: 'The Green Gap and Wedge Study illustrates that the areas between the settlement identified in Policy 19 have been assessed as meeting three separate criteria and found to provide physical and perceptual separation between settlements in the neighbourhood area area.'

Replace 4.19.6 with: 'An addendum to the Study has also been prepared with an update to information about a possible Green Wedge (Berryfield, Bowerhill and Melksham), that no longer fulfils designation criteria due to outline planning permission being granted at appeal, and amendment to another (Melksham and Berryfield), also as result of outline planning permission being granted at appeal. Following the examination of the Plan, the Melksham and Berryfield area is no longer identified in the policy.'

Replace paragraph 4.19.7 with: 'The separation between Berryfield and Semington satisfies criteria 1 and 2 of the Green Gap and Green Wedge Study albeit that it extends outside of the Plan boundary. The southern extent of the separation between the two settlements follows a clear landscape feature of high sensitivity – the Kennet and Avon Canal, which is also the parish boundary between Melksham Without and Semington. The policy applies only in the neighbourhood area, rather than the village of Semington. This acknowledges that a neighbourhood plan can only include land within the designated neighbourhood area.'

Replace paragraph 4.19.8 with: 'The Kennet and Avon Canal is an important landscape and physical feature of both Melksham Without and Semington Parish. Co-ordinated work between the Semington Neighbourhood Plan and this Plan has taken place given the overlapping nature of some of the two sets of policies.'

Policy 20: Locally Distinctive, High-Quality Design

7.178 This is a modified policy. The Plan comments that the QBs recognise the importance of design quality to local distinctiveness and quality of life. In this context the Plan aims to ensure development is designed to complement and strengthen local quality of place, character, and distinctiveness. As such the Plan is supported by the Melksham Design Guidelines and Codes. Figure 19 illustrates the different character areas found in the neighbourhood area, and as detailed in the Design Guidelines and Codes.

7.179 Robert Hitchins Ltd comments on the policy as follows:

'The aspiration of the AECOM Melksham Design Code and Guidelines (2023) is that it should be adopted as the Design guide for Melksham, however it should not be so overly prescriptive that it prevents the use of future innovative materials and design solutions for new residential development, nor should it go beyond national policy in the National Design Guide (2021)11 or the adopted policies of the development plan. Moreover, design codes that are too onerous risk affecting the viability of schemes, especially on brownfield sites, and will prejudice the delivery of identified housing targets for Melksham up to 2038.'

7.180 I note these comments. However, I am satisfied that the document has been produced in good faith and to influence the design and quality of built development rather than to influence its scale and location. Plainly the latter is the broader remit of the submitted Plan and the now-submitted Local Plan.

7.181 The policy takes a very positive approach to design and has regard to Section 12 of the NPPF. The Melksham Design Guidelines and Codes is a very impressive document. Within this broader context I recommend the following modifications to bring the clarity required by the NPPF:

- the recasting of the first part of the policy so that it sets out a general requirement for development proposals rather than commenting that they will be supported. This acknowledges that WC will determine planning applications based on all relevant development plan policies;
- an update of the second part of the policy so that it reflects the adoption of the Wiltshire Design Guide; and
- a revision to the wording used in the third part of the policy to acknowledge the role of a neighbourhood plan in the planning process.

7.182 Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace the first part of the policy with: 'Development proposals should contribute positively to the conservation, enhancement and extension of the quality and local distinctiveness of the neighbourhood area.'

In the second part of the policy replace 'Wiltshire Council design policy' with 'the Wiltshire Design Guide'

In the third part of the policy replace 'must' with 'should'

Policy 21: Local Heritage

7.183 This is a modified policy. The Plan advises that it now refers to non-designated heritage assets which have been identified as the Plan was prepared.

7.184 The Plan comments generally about the number of listed buildings in the neighbourhood area and advises that there are over 150 such buildings in Melksham, most of which are in the Conservation Area. However, it goes on to advise that there is no Conservation Area Assessment or Management Plan to guide and inform conservation, future development, and investment. Nevertheless, Town Centre Masterplanning work has identified important heritage features, including 'noteworthy' buildings (historic buildings that contribute to the character of the area). The supporting text also advises about the Locally Valued Non-Designated Heritage Assets.

7.185 The policy provides a general context for proposals which would affect the Conservation Area, listed buildings or the Locally Valued Non-Designated Heritage Assets. The second part of the policy helpfully sets out a series of criteria with which development proposal should comply. I am satisfied that the policy has regard to Section 16 of the NPPF. In addition, the policy is distinctive to the neighbourhood area

and adds value to national and local planning policies on built heritage. In this context the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Monitoring and Review

7.186 The submitted Plan is a review of the made Plan. However, Section 2 comments about the review of the Local Plan (which has now been submitted for its own examination). Given the current lack of certainty on the final content of the Local Plan it is not possible at this stage to assess the extent to which the neighbourhood plan will be in general conformity with the strategic policies in the Local Plan. In addition, it will be important that the delivery of the policies in the Plan (particularly the housing allocations) is closely monitored. The Plan acknowledges that the development of the Coopers Tires site (Policy 7.1) will be particularly challenging.

7.187 In this context, I recommend that the Plan includes an additional paragraph on monitoring and review to address these matters.

Add a new paragraph (2.4.4) to read:

'The qualifying bodies acknowledge that the adoption of the Wiltshire Local Plan will alter the development plan in the county. In this context the need or otherwise for a further partial review of the Plan will be assessed within six months of the adoption of the Local Plan. The qualifying bodies already have robust measures in place to monitor the effectiveness of the neighbourhood plan. This process will continue throughout the Plan period. Specific attention will be given to the delivery of the five allocated sites. Melksham Town Council will continue to work with potential developers to secure the regeneration of the Coopers Tires site (Policy 7.1).'

Other Matters - General

7.188 This report has recommended a series of modifications both to the policies and to the supporting text in the submitted Plan. Where consequential changes to the text are required directly because of my recommended modification to the policy concerned, I have highlighted them in this report. However other changes to the general text may be required elsewhere in the Plan because of the recommended modifications to the policies. Similarly, changes may be necessary to paragraph numbers in the Plan or to accommodate other administrative matters. It will be appropriate for WC and the QBs to have the flexibility to make any necessary consequential changes to the general text. I recommend accordingly.

Modification of general text (where necessary) to achieve consistency with the modified policies and to accommodate any administrative and technical changes.

Other Matters – Specific

7.189 WC has made a series of helpful comments on the Plan. I have included them in the recommended modifications on a policy-by-policy basis where they are required to ensure that the Plan meets the basic conditions.

7.190 I also recommend the following other modifications to the general text of the Plan based on WC's comments insofar as they are necessary to ensure that the Plan meets the basic conditions. In the main they bring the Plan up-to-date or correct errors. For convenience I use the referencing system in WC's representation

- NPPF paragraph numbers (use the numbering in the December 2023 version);
- The use of consistent references to the emerging Local Plan;
- Paragraph 2.5.2;
- Figure 4;
- Figure 6;
- Paragraph 4.8.34;
- Paragraph 4.10.6;
- Figure 11;
- Figure 12;
- Figure 14c; and
- The title of proposed LGS 47.

8 Summary and Conclusions

Summary

8.1 The Review of the 'made' Plan sets out a range of policies to guide and direct development proposals in the period up to 2038. It has been carefully prepared to refresh the Plan and to address changes in national and local planning policy which have arisen since the Plan was made. It is a first-class example of a local community refreshing its neighbourhood plan.

Conclusion

8.2 Following my independent examination of the Plan I have concluded that the Joint Melksham Neighbourhood Development Plan 2 meets the basic conditions for the preparation of a neighbourhood plan subject to a series of recommended modifications.

8.3 On the basis of the findings in this report, I recommend to Wiltshire Council that subject to the incorporation of the modifications set out in this report that the Joint Melksham Neighbourhood Development Plan 2 should proceed to referendum.

Other Matters

8.4 I am required to consider whether the referendum area should be extended beyond the neighbourhood area. In my view, the neighbourhood area is entirely appropriate for this purpose and no evidence has been submitted to suggest that this is not the case. I therefore recommend that the Plan should proceed to referendum based on the neighbourhood area as initially approved by Wiltshire Council on 14 July 2014 and as amended on 8 November 2017.

. 8.5 I am grateful to everyone who has contributed to the examination of the Plan. The qualifying bodies' responses to the clarification note were both comprehensive and helpful.

Andrew Ashcroft
Independent Examiner
2 May 2025

APPENDIX K - HOUSING LAND SUPPLY STATEMENT PUBLISHED JUNE 2025



Housing Land Supply Statement

Base date: April 2024

Published: June 2025

Wiltshire Council

Housing Land Supply Statement

Base Date: April 2024

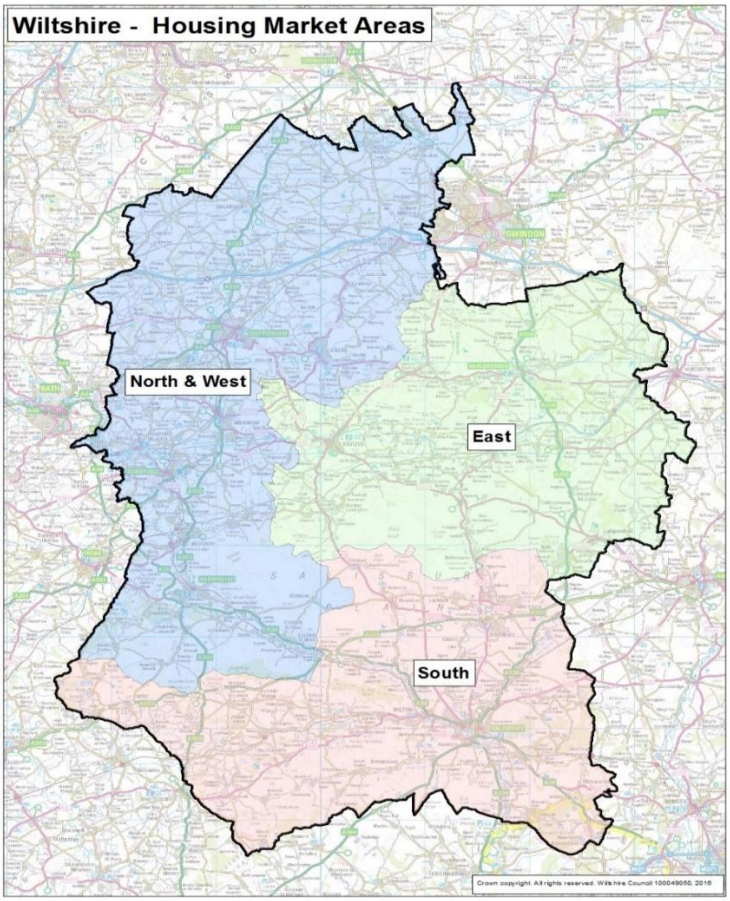
Published: June 2025

1.0 Policy Context - why is a land supply assessment required?

1.1 This Housing Land Supply Statement has been prepared using a base date of 1 April 2024. It covers the housing land supply for the Wiltshire unitary authority area and each Housing Market Area (HMA) within Wiltshire as set out in the Wiltshire Core Strategy (adopted January 2015).

1.2 It represents a snapshot at the date of publication and is produced annually as required by the National Planning Policy Framework (NPPF). This document replaces the 1 April 2023 base date position (published June 2024). The Statement accords with the details stated in the relevant chapters of the accompanying Planning Practice Guidance (PPG).

Figure 1: The HMAs in Wiltshire[1]



[1] Any development immediately adjacent to the urban area of Swindon but within Wiltshire's administrative boundaries is not considered to contribute to the housing requirements of the North and West HMA. See paragraph 4.34 of the Wiltshire Core Strategy for clarification.

1.3 Within the latest NPPF (MHCLG, December 2024), with regard to housing provision and the five-year housing land supply calculation, paragraphs 78 and 79 state:

78. Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies[38], or against their local housing need where the strategic policies are more than five years old[39]. The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:

a) 5% to ensure choice and competition in the market for land; or

b) 20% where there has been significant under delivery[40] of housing over the previous three years, to improve the prospect of achieving the planned supply; or

c) From 1 July 2026, for the purposes of decision-making only, 20% where a local planning authority has a housing requirement adopted in the last five years examined against a previous version of this Framework[41], and whose annual average housing requirement[42] is 80% or less of the most up to date local housing need figure calculated using the standard method set out in national planning practice guidance.

79. To maintain the supply of housing, local planning authorities should monitor progress in building out sites which have permission. Where the Housing Delivery Test indicates that delivery has fallen below the local planning authority's housing requirement over the previous three years, the following policy consequences should apply:

a) where delivery falls below 95% of the requirement over the previous three years, the authority should prepare an action plan to assess the causes of under-delivery and identify actions to increase delivery in future years;

b) where delivery falls below 85% of the requirement over the previous three years, the authority should include a buffer of 20% to their identified supply of specific deliverable sites as set out in paragraph 78 of this framework, in addition to the requirement for an action plan;

c) where delivery falls below 75% of the requirement over the previous three years, the presumption in favour of sustainable development applies, as set out in footnote 8 of this Framework, in addition to the requirements for an action plan and 20% buffer.

The footnotes in these paragraphs read as follows:

38 The delivery of large scale developments may need to extend beyond an individual plan period, and the associated infrastructure requirements may not be capable of being identified fully at the outset. Anticipated rates of delivery and infrastructure requirements should, therefore, be kept under review and reflected as policies are updated.

39 Unless these strategic policies have been reviewed and found not to require updating. Where local housing need is used as the basis for assessing whether a five year supply of specific deliverable sites exists, it should be calculated using the standard method set out in national planning practice guidance.

40 This will be measured against the Housing Delivery Test, where this indicates that delivery was below 85% of the housing requirement.

41 Or the housing requirement is more than five years old and the relevant strategic policies have been reviewed and found not to require updating.

42 Defined as the total housing requirement, divided by the number of years in the plan period. For joint local plans, the percentage should be applied in aggregate across the joint local plan area.

1.4 The word ‘deliverable’ is defined within Annex 2, as follows:

“To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years.

In particular:

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable,

there is no longer a demand for the type of units or sites have long term phasing plans).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years."

1.4 The chapters in the PPG which are most relevant to this Statement are:

- '**Housing and economic needs assessment**'. This chapter was most recently updated in December 2024[2].

- '**Housing supply and delivery**'. This chapter was launched in July 2019, and was formulated by the compilation of the previous chapters entitled 'Housing Delivery: 5 year land supply' and 'Housing Delivery Test' into a single chapter. It was most recently updated in December 2024.

The Council calculate its housing land supply position and publish this Statement in accordance with the NPPF (December 2024) and latest chapters of the PPG.

1.5 Site references provided in this Statement differ in format depending on the planning status. Saved Local Plan allocations, strategic allocations in the Wiltshire Core Strategy, and Neighbourhood Plan allocations are given an internal reference. Allocations in the Chippenham Site Allocations Plan and Wiltshire Housing Site Allocations Plan use the reference quoted in the Plan.

The references for planning permissions are in two formats.

i) planning application numbers as currently used by the Council.

ii) a historic format used to regularise the different planning application numbers used by the former district Councils, and permissions granted by the New Forest National Park Authority. The references

[2] An additional paragraph was inserted in February 2025 related to joint local plans, however this update is not applicable to Wiltshire.

quoted in this statement are based on the planning application number, and include:

- the former district area (N=North Wiltshire, W=West Wiltshire, E=Kennet, S=Salisbury District) or NF=New Forest National Park Authority
- the year the application was registered (expressed as a 2-digit year)
- the core 4 or 5 digit reference

For example, site **E15.3905**:

- is located in the former Kennet District Council area (E),
- was registered in 2015,
- has the core application reference '03905'.

As the Council now uses a common planning application processing system, the planning application number will appear more frequently in this and future Statements. Permissions using the historic format will appear less frequently as these permissions are completed and they no longer form a source of supply.

2.0 Housing requirement

2.1 The application of NPPF paragraph 78 indicates how the housing requirement is calculated in the five-year housing land supply.

2.2 The Wiltshire Core Strategy contains the strategic policies for the Wiltshire development plan. Core Policy 2 sets out the strategic housing requirements for the plan and includes the quantitative housing requirement and the spatial distribution for how the overall requirement should be distributed across Wiltshire. The Wiltshire Core Strategy was adopted on 20 January 2015. As such the plan and its policies became 5 years old on **20 January 2020**.

2.3 Under the terms of NPPF paragraph 78, the strategic policies are more than five years old, and thus the housing requirements should be established by the Local Housing Need (calculated using the Government's standard methodology). This figure should now be used in the housing land supply calculation. The Council have not carried out a review of the strategic policies so the clause in footnote 41 of the NPPF does not currently apply to the Council's position. This calculation provides the quantitative amount of housing need against which the Council's housing land supply should be measured.

2.4 Planning legislation[3] requires that the determination of planning applications must be made in accordance with the Development Plan, unless material considerations indicate otherwise. This indicates that the development plan has statutory priority in decision-making. To assess the Council's performance in housing delivery and provision, this Statement sets out the housing land supply position using the Local Housing Need at a unitary authority level to be applied in NPPF paragraph 78, and also the position against the indicative housing requirements set out in Core Policy 2 in the Wiltshire Core Strategy.

3.0 Housing completions

3.1 Wiltshire Council monitors housing completions annually. The number of completions from 1 April 2006 to 31 March 2024 against the requirements of the Wiltshire Core Strategy is shown in Table 1 of this Statement. Cells where the Council have achieved or exceeded the annualised figure are shaded.

[3] Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990.

Table 1: Housing delivery compared to the annualised requirement figure in the Wiltshire Core Strategy (WCS) (2006-2026)

Housing Requirement	Area	Annualised housing requirement	2006/07	2007/08	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	*...continues below….*
WCS 2006-2026	East Wiltshire HMA	297	335	597	402	247	438	248	182	260	267	177	
	North and West Wiltshire HMA	1,237	1,365	1,609	999	926	1,219	1,028	1,039	1,517	1,139	915	
	South Wiltshire HMA	521	371	456	484	484	398	446	456	429	547	523	
	Wiltshire[#]	2,100	2,071	2,662	1,885	1,657	2,077	1,779	1,725	2,249	2,118	1,746	

Housing Requirement	Area	Annualised housing requirement	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	**Average annual completions across plan period**	**% of annualised requirement achieved**
WCS 2006-2026	East Wiltshire HMA	297	471	415	382	262	180	274	276	156	309	104%
	North and West Wiltshire HMA	1,237	1,269	1,186	1,349	1,008	1,425	1,133	1,341	1,208	1,204	97%
	South Wiltshire HMA	521	794	676	845	529	321	455	808	425	524	101%
	Wiltshire[#]	2,100	2,690	2,428	2,699	1,799	1,926	1,862	2,425	1,825	2,090	100%

[#] Values in this row may not sum from the HMA figures due to completions on sites at the West of Swindon.

4.0 Buffer

4.1 Paragraph 79 of the NPPF states that a buffer should be added to the housing requirement in the 5-year housing supply calculation. This is established through a nationally-set Housing Delivery Test which measures housing delivery for each Local Planning Authority over the past 3 years against the appropriate housing requirement. This is set out in the Housing Delivery Test Measurement Rulebook (MHCLG, December 2024).

4.2 The latest Housing Delivery Test results (published December 2024) indicate that Wiltshire achieved **135%** delivery against the housing requirement in the Housing Delivery Test. This result indicates that a 5% buffer should be added to the housing requirement in the 5-year housing land supply calculation.

5.0 Components of Supply

5.1 The supply of deliverable and developable land currently includes:

- Sites with planning permission or prior approval consent,
- Sites with resolutions to grant planning permission subject to completion of a Section 106 agreement,
- Saved District Local Plan allocations (that have been reviewed and carried forward as part of the Wiltshire Core Strategy),
- Strategic Sites within the adopted Wiltshire Core Strategy (January 2015),
- Site Allocations within the adopted Chippenham Site Allocations Plan (May 2017),
- Site Allocations within the adopted Wiltshire Housing Site Allocations Plan (February 2020),
- Housing allocations in ‘made’ Neighbourhood Plans,
- a windfall allowance (in accordance with paragraph 75 of the NPPF).

5.2 An annual trajectory for all sources of supply is included in **Appendix 1**.

5.3 Large sites (10 units or more) and all Neighbourhood Plan allocations are shown on a ‘site-by-site’ basis. Each Large site and all Neighbourhood Plan allocations have been individually assessed to determine site specific delivery trajectories.

5.4 Small permitted sites (less than 10 units) are shown as a summary total by HMA in **Appendix 1**. The individual sites which contribute to the developable supply are presented in **Appendix 2** (separate document). For Small sites (except for Neighbourhood Plan allocations) a standard development rate is applied based on historic levels of delivery across Wiltshire for such sites.

5.5 The PPG chapter 'Housing supply and delivery' indicates that student housing and accommodation for older people, including residential institutions in Use Class C2 can be included in the housing land supply. This contribution is based on the amount of accommodation released in the housing market. The PPG chapter on 'Housing for older and disabled people' indicates this calculation should be based on the average number of adults living in households, using Census data. This calculation indicates that there is a adults-to-households ratio of **1.83:1** in Wiltshire. This is the ratio used to inform how institutional accommodation for the elderly can be counted towards the housing land supply.

5.6 The strategic allocations in the Wiltshire Core Strategy, Chippenham Site Allocations Plan, and Wiltshire Housing Site Allocations Plan form the most sustainable options for delivering strategic housing developments across Wiltshire. They have been appraised using a site identification methodology and using the Sustainability Appraisal (SA). Therefore, it is necessary only to demonstrate the availability and achievability of each site to warrant its inclusion in the housing land supply.

5.7 A summary of progress on sites that the Council consider will deliver (or currently are delivering) housing in the forthcoming 5-year period is shown in **Appendix 3** for each Large site and any Neighbourhood Plan allocations.

5.8 A graphical representation of completions and anticipated delivery from future supply in the adopted plan period for Wiltshire and each HMA is shown in **Appendix 4**.

5.9 A windfall allowance is also included in the deliverable and developable supply in accordance with paragraph 75 of the NPPF. A full description of the calculation of the windfall allowance is included in **Appendix 5**.

5.10 **Appendix 6** to this statement identifies the contribution of the various sources of supply to the delivery of the housing requirements of the Wiltshire Core Strategy for the Community Areas, Principal Settlements, Market Towns and (in the South Wiltshire HMA only) the Local Service Centres.

6.0 Housing land supply position

Local Housing Need

6.1 As detailed in section 2 above the Wiltshire Core Strategy and its strategic housing policies became five years old in January 2020. As such the Local Housing Need is now used in the housing land supply calculation. This is the position used in the operation of paragraph 78 of the NPPF.

6.2 Table 2a provides a headline of the housing land supply using the Local Housing Need.

Table 2a: 5-year Housing Land Supply position for Wiltshire (using Local Housing Need)

Area	Annual Local Housing Need (LHN)	5-year housing requirement	5-year housing requirement plus buffer*	Deliverable supply 2024-2029	Number of years deliverable supply
Wiltshire	3,525	17,625	18,506	8,945	**2.42**

** The Council's 2023 Housing Delivery Test result indicates that there is a requirement to add a 5% buffer to the housing requirement (see section 4 above)*

6.3 The PPG chapter "Housing and economic needs assessment" (December 2024) sets out the standard methodology to be used by Local Planning Authorities to calculate the Local Housing Need. The calculation for Wiltshire, using the input variables as at the base date to which it relates, is shown in Table 2b below.

Table 2b: Housing Land Supply calculation for Wiltshire

Step 1 - Setting the baseline

Latest existing housing stock (release date May 2024)	231,098
0.8% of existing housing stock	1,848.8
Baseline annual need	**1,848.8**

Step 2 - An adjustment to take account of affordability

Median workplace-based affordability ratio across last five years (9.68 + 9.58 + 10.33 + 9.76 + 9.51) / 5 (release date 25 March 2024)	9.77
Local affordability factor	9.77

Adjustment factor (Local affordability factor - 5) x 0.95 + 1 5	1.906680
Local Housing Need for Wiltshire	**3,525**

5-year housing requirement including buffer

Figure over a 5 year period	17,625
Latest housing delivery result (%)	135
Buffer to be added	5%
Number of dwellings to be used in the Wiltshire LPA housing land supply calculation	**18,506**

Deliverable supply	**8,945**

Number of years supply against Local Housing Need	**2.42**

Strategic housing policies

6.4 The Council continue to monitor delivery against the requirements set out in the adopted strategic development plan. This has been provided for context to show how the supply position varies across the three HMAs defined in the adopted plan.

6.5 Table 3 provides a summary of completions to date, the deliverable supply for the remaining two years of the plan period (2024-2026), and the number of dwellings by which delivery will either exceed, or be in deficit of, the housing requirement for each HMA.

Table 3: Deliverable supply relative to the housing requirement of the adopted Wiltshire Core Strategy (WCS).

Area	Housing requirement 2006-2026	Housing completions 2006-2024	Deliverable supply (commitments and windfall) 2024-2026	Surplus (-ve) / shortfall (+ve) against WCS requirement
East Wiltshire HMA	5,940	5,569	444	-73
North and West Wiltshire HMA	24,740	21,675	2,185	880
South Wiltshire HMA	10,420	9,430	734	256
Swindon (within Wiltshire)*	900	932	0	-32
Wiltshire	42,000	37,606	3,363	1,031

** Figures at the West of Swindon do not form a housing requirement. See Wiltshire Core Strategy paragraph 4.34 and footnote 25 for explanation.*

7.0 Ongoing and Future Monitoring

7.1 The housing land supply situation and the residual requirement is monitored on an annual basis using up to date evidence from land owners, developers, Council officers, and other relevant bodies. This informs and, where necessary, triggers the provision of new sites to meet outstanding requirements. This is consistent with the requirements of the NPPF.

7.2 For an authority covering a large geographical area, the annual review of the land supply in Wiltshire is an extensive exercise that often takes a period of time after the base date to complete. This involves identifying new commitments and completions, compiling the updated housing land supply position and the Housing Land Supply Statement. During this period permissions continue to be granted (and resolved to permit) and Neighbourhood Plans prepared. However, to ensure a consistent calculation of the annual position, only sites that have qualified for inclusion by the base date of the monitoring period should be included in the deliverable land supply.

7.3 Large sites (10 units or more) which have been granted permission or resolution to permit on or after the 1 April 2024 base date up to the time of publication are not included in the housing land supply, as they are not committed by the base date. However, such sites are detailed in Table 4 below to demonstrate how permissions are continually being granted to refresh the Council's housing land supply.

7.4 It is noted that anticipated delivery from sites on brownfield land shown in Table 4 are already accounted for within the housing land supply in the Council's windfall allowance. This allowance seeks to allow for anticipated delivery from all brownfield sites and small greenfield sites that are not committed as at the base date. The methodology for this is set out in Appendix 5 of this Statement.

Table 4: Additional housing permissions on Large sites identified on and beyond the monitoring period base date of 1 April 2024.

Site reference	Site Address	HMA	Number of units (net)	Status	Status date
PL/2023/07518	Avonpark Village, Winsley Hill, Winsley, BA2 7FF (BROWNFIELD)	North and West	14 (net) C2 units	Full permission	09/05/2024
PL/2023/06976	Land at Verbena Court, Melksham, SN12 7GG	North and West	71 C2 units	Resolution to grant	04/06/2024
PL/2023/06725	Land at Longleaze Lane, Melksham, Wilts, SN12 6QJ	North and West	86 C2 units	Full permission	21/08/2024
PL/2022/08155	Land to the West of Semington Road, Melksham, Wilts	North and West	53	Outline permission	30/09/2024
PL/2023/06881	Bartlett House, Old Common Way, Ludgershall, Andover, SP11 9SA (BROWNFIELD)	East	18	Full permission	04/11/2024
PL/2021/06918	Widham Farm, Purton, Wiltshire	North and West	59	Full permission	20/11/2024
PL/2023/00478	Land off Angelica Avenue, Melksham, Wiltshire, SN12 6QJ	North and West	11	Outline permission	02/01/2025
PL/2021/03749	Land at Glenmore Farm, The Ham/Hawkeridge Road, Westbury BA13 4HQ	North and West	145	Outline permission	21/01/2025
PL/2022/02452	Land at Stones Farm, West Mill Lane, Cricklade SN6 6JL	North and West	140	Outline permission	23/01/2025
PL/2023/08640	Land South of Stanley Lane, Gate Farm, Chippenham	North and West	150	Resolution to grant	23/01/2025
PL/2023/11188	Land at Blackmore Farm, Sandridge Common, Melksham	North and West	500	Resolution to grant	23/01/2025
PL/2023/06204	Land Off The High Street, Sutton Benger, SN15 4SP	North and West	60	Outline permission	27/01/2025
PL/2023/09930	Punters Farm, Malmesbury, SN16 9JP	North and West	21	Full permission	30/01/2025
PL/2022/07893	Land off Spitfire Road, Calne	North and West	90	Outline permission	17/02/2025

Site reference	Site Address	HMA	Number of units (net)	Status	Status date
PL/2022/00395	Land at South Pavenhill Farm, Pavenhill, Purton, Wilts, SN5 4DQ	North and West	60	Outline permission	05/03/2025
PL/2024/00190	The John Barleycorn, Weymouth Street, Warminster, BA12 9NP (BROWNFIELD)	North and West	10	Full permission	06/03/2025
PL/2023/01880	Land rear of 117 High Street, Dilton Marsh, BA13 4DP	North and West	54	Outline permission	12/03/2025
PL/2023/02372	Land South of Ballingers, Urchfont	East	21	Outline permission	28/03/2025
PL/2023/07368	Old Sarum Airfield, Salisbury	South	315	Outline permission	09/04/2025
PL/2024/05435	Land north of Melksham Road, Holt	North and West	55	Resolution to grant	15/04/2025

Appendix 1: Summary breakdown of all sites in the deliverable supply

N.B. Neighbourhood Plan allocations which are Small sites (i.e. less than 10 dwellings) are shown as a site-specific record in this Appendix, rather than in the aggregated total for Small permitted sites.

Site Address	Site reference	Committed dwellings outstanding at April 2024	Units under construction	Completions to date	Losses to date		2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	Settlement / CA Remainder
East Wiltshire HMA														
Grand Total		**1,937**	**249**	**187**	**10**		**134**	**309**	**379**	**346**	**233**	**251**	**206**	
Total Small permitted sites (see Appendix 2)		**274**	**87**	**11**	**10**		**38**	**74**	**39**	**22**	**8**	**3**	**1**	
Agricultural land, Park Farm, Seend Cleeve, Melksham, SN12 6PX	20/02213/FUL	11	11	0	0		11	0	0	0	0	0	0	Devizes CA Remainder
Devizes Community Hospital, New Park Road, Devizes, Wilts, SN10 1EF	PL/2022/08744	58	0	0	0		0	0	0	0	0	29	29	Devizes
Drummond Park Ludgershall SP11 9RT	21/02122/REM	303	66	109	0		65	65	65	65	43	0	0	Tidworth/ Ludgershall
Hales Farm, The Green, Urchfont, SN10 4QU	19/11986/FUL	6	6	7	0		6	0	0	0	0	0	0	Devizes CA Remainder
Hedges House, Mill Lane, West Lavington, Devizes SN10 4HS	PL/2021/11543	-2	0	0	0		-21	10	9	0	0	0	0	Devizes CA Remainder
Land Adjacent to Empress Way Ludgershall Wiltshire	18/04346/REM	20	14	60	0		0	20	0	0	0	0	0	Tidworth/ Ludgershall
Land At Empress Way, Ludgershall	20/06554/FUL	190	0	0	0		0	0	52	52	52	34	0	Tidworth/ Ludgershall

Site Address	Site reference	Committed dwellings outstanding at April 2024	Units under construction	Completions to date	Losses to date		2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	Settlement / CA Remainder
Land at Marshall Road, Devizes, Wiltshire	PL/2023/05033	163	0	0	0		0	54	61	48	0	0	0	Devizes
Land at Sandleaze Farm, Worton, Wiltshire	PL/2022/08551	24	0	0	0		0	14	10	0	0	0	0	Devizes CA Remainder
Land east of Reed Place, Rowde, SN10 2GX	PL/2021/07576	10	0	0	0		0	10	0	0	0	0	0	Devizes CA Remainder
Land north of Quakers Road, Devizes, Wiltshire SN10 2FH	21/02477/OUT	57	0	0	0		0	15	30	9	0	0	0	Devizes
Land off Coate Road, Devizes	PL/2021/04774	200	0	0	0		0	0	40	50	50	50	10	Devizes
Land South of Lavington Lane, West Lavington	PL/2021/11899	50	50	0	0		25	25	0	0	0	0	0	Devizes CA Remainder
Land to the north of Marshall Road, Devizes, Wilts	PL/2022/05360	33	0	0	0		0	0	0	0	0	10	23	Devizes
Land West of Hillworth Road / John Rennie Close, Devizes, Wiltshire, SN10 5HD	PL/2022/00867	59	0	0	0		0	0	0	0	0	15	30	Devizes
Marlborough Resource Centre, Cherry Orchard, Marlborough	PL/2021/11719	24	0	0	0		0	0	0	12	12	0	0	Marlborough
Parnham Coaches, 31 Andover Road, Ludgershall	20/02272/FUL	27	0	0	0		0	10	17	0	0	0	0	Tidworth/ Ludgershall
Seymour Court, Blackmans Lane, Burbage, SN8 3TW	PL/2022/06850	-9	0	0	0		0	-26	7	10	0	0	0	Pewsey CA
St Peters Junior School, The Parade, Marlborough, SN8 1LQ	PL/2021/03930	15	15	0	0		0	7	5	3	0	0	0	Marlborough

Site Address	Site reference	Committed dwellings outstanding at April 2024	Units under construction	Completions to date	Losses to date		2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	Settlement / CA Remainder
Wiltshire Police, George Lane, Marlborough, Wiltshire, SN8 4DB	20/07915/OUT	24	0	0	0		0	0	0	0	0	12	12	Marlborough
York Place, St Martins, Marlborough	PL/2023/03305	28	0	0	0		0	0	0	14	14	0	0	Marlborough
Total Large permitted and 'subject to S106' sites		**1,291**	**162**	**176**	**0**		**86**	**204**	**296**	**263**	**171**	**150**	**104**	
Bath Road Business Centre	NP/E12	13	0	0	0		0	0	0	0	0	0	0	Devizes
Grafton Road	NP/E22	30	0	0	0		0	0	0	0	0	0	0	Pewsey CA
Land at Barton Dene	NP/E36	40	0	0	0		0	0	0	0	0	20	20	Marlborough
Land at Kelham Gardens	NP/E38	9	0	0	0		0	0	0	9	0	0	0	Marlborough
Land at the Spring	NP/E33	20	0	0	0		0	0	0	0	0	7	7	Devizes CA Remainder
Land to the east of Lavington School	NP/E35	15	0	0	0		0	0	0	0	0	0	0	Devizes CA Remainder
Lottage Farm	NP/E39	32	0	0	0		0	0	0	0	0	16	16	Marlborough CA Remainder
Marlborough Road Site	NP/E01	49	0	0	0		0	0	0	0	0	0	0	Pewsey CA
South of the "Meadows", Hartmoor Road.	NP/E10	18	0	0	0		0	0	0	0	0	0	0	Devizes
Southcliffe	NP/E34	22	0	0	0		0	0	0	0	0	0	0	Devizes CA Remainder
Stonebridge House, Nursteed Road	NP/E03	14	0	0	0		0	0	0	0	0	0	0	Devizes
Wadworth Warehouse, Northgate St	NP/E16	30	0	0	0		0	0	0	0	0	0	0	Devizes

Site Address	Site reference	Committed dwellings outstanding at April 2024	Units under construction	Completions to date	Losses to date		2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	Settlement / CA Remainder
Whole of Garden Trading Est	NP/E13	38	0	0	0		0	0	0	0	0	0	0	Devizes
Blackberry Lane - Site A6	NP/E18	5	0	0	0		0	0	0	0	0	0	0	Devizes CA Remainder
Garage and Old Dairy, New Park Street	NP/E09	5	0	0	0		0	0	0	0	0	0	0	Devizes
Land at Alcudia, The Ham	NP/E25	1	0	0	0		0	0	0	0	0	0	0	Devizes CA Remainder
Land off Firs Hill Way - Site A3	NP/E19	5	0	0	0		0	0	0	0	0	0	0	Devizes CA Remainder
Land opposite Sawmills	NP/E31	1	0	0	0		0	0	0	0	0	0	0	Devizes CA Remainder
Magistrates Court, Elcombe Gardens	NP/E11	7	0	0	0		0	0	0	0	0	0	0	Devizes
Railway Cuttings, Hillworth Road	NP/E07	9	0	0	0		0	0	0	0	0	0	0	Devizes
Ryeleaze Field - Site A5	NP/E21	4	0	0	0		0	0	0	0	0	0	0	Devizes CA Remainder
Wildmans Garage	NP/E30	5	0	0	0		0	0	0	0	0	0	3	Devizes CA Remainder
Total adopted and emerging Neighbourhood Plan allocations		**372**	**0**	**0**	**0**		**0**	**0**	**0**	**10**	**1**	**43**	**46**	
Windfall – brownfield small sites							**8**	**22**	**30**	**35**	**36**	**37**	**37**	
Windfall – brownfield large sites							**0**	**1**	**2**	**3**	**3**	**4**	**4**	
Windfall – greenfield small sites							**3**	**9**	**12**	**13**	**14**	**14**	**14**	

Site Address	Site reference	Committed dwellings outstanding at April 2024	Units under construction	Completions to date	Losses to date		2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	Settlement / CA Remainder
North and West Wiltshire HMA														
Grand Total		**11,365**	**1,005**	**1,908**	**23**		**918**	**1,267**	**1,573**	**1,201**	**852**	**1,106**	**1,243**	
Total Small permitted sites (see Appendix 2)		**838**	**115**	**10**	**20**		**116**	**231**	**123**	**69**	**27**	**9**	**3**	
"Land at Sutton Lane Sutton Benger SN15 4RR"	20/03487/FUL	21	21	0	0		3	18	0	0	0	0	0	Chippenham CA Remainder
"Land South of Low Lane, Calne, SN11 8EQ"	PL/2022/09034	26	0	0	0		0	13	13	0	0	0	0	Calne
1-4 Avon Heights, Monkton Hill, Chippenham, SN15 1ER	21/00286/PNCOU	25	25	0	0		0	0	25	0	0	0	0	Chippenham
17 Station Hill, Chippenham, SN15 1EQ	20/06500/FUL	13	0	0	0		0	13	0	0	0	0	0	Chippenham
26 Fore Street, Trowbridge	21/01148/FUL	24	24	0	0		0	0	0	24	0	0	0	Trowbridge
3 High Street, Warminster, BA12 9AG	19/04315/FUL	11	0	0	0		0	0	0	0	0	0	0	Warminster
7, 8 and 9 Back Street	W07.3403	22	0	0	0		0	0	0	0	0	0	0	Trowbridge
Ashton Street Centre, Ashton Street	PL/2021/09909	48	0	0	0		0	0	0	24	24	0	0	Trowbridge
Bugley Barton Farm, Land South of Victoria Road, Warminster	17/01463/FUL	227	0	0	0		0	0	25	45	45	45	45	Warminster
Church Farm, Church Street, Hilperton, Trowbridge, Wiltshire	20/09998/FUL	11	11	3	0		11	0	0	0	0	0	0	Trowbridge CA Remainder

Site Address	Site reference	Committed dwellings outstanding at April 2024	Units under construction	Completions to date	Losses to date		2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	Settlement / CA Remainder
Clarks Mill and Mill House Stallard Street Trowbridge Wiltshire BA14 8HH	PL/2022/00462	1	1	19	0		0	0	1	0	0	0	0	Trowbridge
Cotswold Community, Ashton Keynes, SN6 6QU	21/02520/REM	48	0	0	0		24	24	0	0	0	0	0	Malmesbury CA Remainder
Courtfield House, Polebarn Road, Trowbridge, BA14 7EG	18/04656/FUL	20	20	0	0		16	4	0	0	0	0	0	Trowbridge
Elwood House, Former A429, Stanton St Quintin	20/11517/FUL	12	12	0	0		12	0	0	0	0	0	0	Chippenham CA Remainder
Former AB Carter Haulage Contractors, 14 Happy Land, Ashton Keynes, Wiltshire, SN6 6PN	20/09696/FUL	10	10	0	0		10	0	0	0	0	0	0	Malmesbury CA Remainder
Former MOD Rudloe No.2, Westwells Road, SN13 9RA	19/07339/REM	166	0	0	0		0	0	0	0	0	0	0	Corsham CA Remainder
Former Sydenhams Yard, Bradley Lane, Maiden Bradley, BA12 7JR	PL/2021/08100	4	4	6	0		4	0	0	0	0	0	0	Warminster CA Remainder
Former Wiltshire College, Cocklebury Road, Chippenham, SN15 3QD	PL/2022/03760	44	0	0	0		0	0	0	0	0	0	0	Chippenham
Former Wiltshire College, Cocklebury Road, Chippenham, SN15 3QD	PL/2022/03760	38	0	0	0		0	0	0	0	0	0	0	Chippenham
Gable House, 46 High Street, Malmesbury, SN16 9AT	20/06887/FUL	14	0	0	0		0	0	14	0	0	0	0	Malmesbury

Site Address	Site reference	Committed dwellings outstanding at April 2024	Units under construction	Completions to date	Losses to date		2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	Settlement / CA Remainder
Ground and First Floor Block C, The Pavilions, Windsor Road, Trowbridge, Wiltshire	PL/2021/07628	34	34	0	0		34	0	0	0	0	0	0	Trowbridge
Heywood House, Park Lane	W07.1377	27	0	0	0		0	0	0	0	0	0	0	Westbury CA Remainder
Kingston Mills, Kingston Road	W06.2394	1	0	169	0		1	0	0	0	0	0	0	Bradford on Avon
Land At Ambulance Headquarters, Malmesbury Road, Chippenham, Wiltshire, SN15 5LN	20/05495/FUL	95	0	0	0		0	35	35	25	0	0	0	Chippenham
Land at Backbridge Farm, Malmesbury, Wiltshire	16/06401/FUL	75	75	126	0		60	15	0	0	0	0	0	Malmesbury
Land At Broadfield Farm, Great Somerford, SN15 5EL	21/01950/FUL	21	21	0	0		11	10	0	0	0	0	0	Malmesbury CA Remainder
Land at Chippenham Road, Lyneham, SN15 4PA	PL/2022/07119	200	0	0	0		0	10	20	40	40	40	50	Royal Wootton Bassett & Cricklade CA Remainder
Land at Elizabeth Way, Hilperton,, Trowbridge	20/09701/FUL	187	0	0	0		0	46	60	60	21	0	0	Trowbridge
Land at Elm Grove, Drynham Lane, Trowbridge, Wiltshire, BA14 0PL	19/11459/OUT	261	0	0	0		0	40	50	50	50	50	8	Trowbridge
Land at Filands Road / Jenners Lane, Malmesbury, SN16 9GT	PL/2023/00958	132	0	0	0		15	50	50	17	0	0	0	Malmesbury

Site Address	Site reference	Committed dwellings outstanding at April 2024	Units under construction	Completions to date	Losses to date		2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	Settlement / CA Remainder
Land at Grove Farm Bincknoll Lane Royal Wootton Bassett Swindon SN4 8BD	18/06442/FUL	10	10	0	0		10	0	0	0	0	0	0	Royal Wootton Bassett
Land at Hunters Moon Chippenham Wiltshire	N18.0401	2	2	70	0		0	2	0	0	0	0	0	Chippenham
Land at Hunters Moon Chippenham Wiltshire	N16.12493	33	33	107	0		33	0	0	0	0	0	0	Chippenham
Land at Hunters Moon, Chippenham	20/06824/REM	10	10	50	0		10	0	0	0	0	0	0	Chippenham
Land at North Chippenham, Hill Corner Road, West of A350, Chippenham	20/11468/REM	6	6	31	0		6	0	0	0	0	0	0	Chippenham
Land at Patterdown Road, Chippenham	19/00098/REM	21	21	51	0		4	0	17	0	0	0	0	Chippenham
Land at Phase 2, Star Ground, Station Road, Holt, Wiltshire.	PL/2021/09777	10	10	0	0		10	0	0	0	0	0	0	Bradford on Avon CA Remainder
Land at Pound Farm, South View, Lyneham	PL/2021/09817	26	26	24	0		26	0	0	0	0	0	0	Royal Wootton Bassett & Cricklade CA Remainder
Land at Purton Road, Swindon	20/10523/OUT	79	0	0	0		0	0	0	0	0	30	40	Royal Wootton Bassett & Cricklade CA Remainder

Site Address	Site reference	Committed dwellings outstanding at April 2024	Units under construction	Completions to date	Losses to date		2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	Settlement / CA Remainder
Land at Rawlings Farm, Cocklebury Lane, Chippenham, Wiltshire, SN15 3LR	15/12351/OUT	650	0	0	0		0	0	0	0	0	40	100	Chippenham
Land at Regents Park, Calne	20/07659/OUT	17	0	0	0		0	0	17	0	0	0	0	Calne
Land at Restrop Road, Purton, SN5 4BP	PL/2023/02576	47	47	0	0		20	27	0	0	0	0	0	Royal Wootton Bassett & Cricklade CA Remainder
Land at Saltersford Lane, Chippenham	PL/2022/06612	70	0	0	0		0	0	0	20	30	20	0	Chippenham
Land at Semington Road, Melksham, Wilts	PL/2022/02749	144	0	0	0		10	40	40	40	14	0	0	Melksham
Land at Showell Farm, Patterdown Road, Showell, Chippenham, SN15 2NT	PL/2022/07442	40	0	0	0		0	0	40	0	0	0	0	Chippenham
Land at Showell Nurseries, Showell, Chippenham, Wiltshire, SN15 2NU	20/11654/REM	120	0	0	0		0	20	40	40	20	0	0	Chippenham
Land at Silver Street Calne Wiltshire	N16.4124	22	22	132	0		22	0	0	0	0	0	0	Calne
Land at the proposed West Warminster Urban Extension North of Victoria Road & to the West of Bath Road Comprising approx. 84 hectares Warminster Wilt	15/01800/OUT	855	0	0	0		0	90	90	90	90	90	90	Warminster
Land at The Street, Hullavington	20/10972/OUT	71	0	0	0		0	14	52	5	0	0	0	Chippenham CA Remainder

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Land at Westbury Sailing Lake, Station Road, Westbury, Wiltshire,	W17.12194	21	21	264	0		21	0	0	0	0	0	0	Westbury
Land East of Damask Way and East of Upper Marsh Road and North of Smallbrook Lane, Warminster BA12 9PP	17/12348/OUT	28	0	0	0		0	0	0	0	0	0	0	Warminster
Land North of Folly Farm Warminster	19/09428/FUL	4	4	42	0		4	0	0	0	0	0	0	Warminster
Land north of Grovelands Way Warminster BA12 8TB (Extra care element)	W17.5360	46	0	0	0		0	0	0	0	0	0	0	Warminster
Land north of Grovelands Way Warminster BA12 8TB (Retirement bungalows)	19/07198/VAR	45	0	0	0		0	0	20	25	0	0	0	Warminster
Land North of Grovelands Way, Warminster., BA14 8JN (Care home element)	PL/2021/03889	34	0	0	0		0	0	34	0	0	0	0	Warminster
Land North of Hill Corner Road Land Parcel B3 & B5 Chippenham Wiltshire	19/08039/VAR	12	12	110	0		12	0	0	0	0	0	0	Chippenham
Land north of St George's Road, Semington	19/02147/OUT	26	0	0	0		0	0	13	13	0	0	0	Melksham CA Remainder
Land North of Victoria Road & to the West of Bath Road, Phase 1, Land North of Victoria Road, Warminster	PL/2022/04343	68	35	77	0		68	0	0	0	0	0	0	Warminster

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Land North of Webbs Court, Lyneham	PL/2021/11175	56	0	0	0		0	0	10	25	21	0	0	Royal Wootton Bassett & Cricklade CA Remainder
Land north of Westbury Road and west of Court Orchard, Bratton, Wiltshire	PL/2023/07170	31	0	0	0		0	20	11	0	0	0	0	Westbury CA Remainder
Land off Frome Road, Upper Studley, Trowbridge	20/09659/FUL	50	0	0	0		0	0	25	25	0	0	0	Trowbridge
Land off Melksham Road, Holt	PL/2022/03315	90	0	0	0		0	0	0	0	0	20	50	Bradford on Avon CA Remainder
Land off of Elizabeth Way, Hilperton, Wiltshire, BA14 7	PL/2021/08554	151	31	0	0		54	55	42	0	0	0	0	Trowbridge
Land off Park Road, Malmesbury, SN16 0QW	19/05898/OUT	50	0	0	0		0	0	0	0	0	25	25	Malmesbury
Land off Potley Lane, Corsham, Wiltshire, SN13 9RX	20/03234/FUL	13	13	0	0		13	0	0	0	0	0	0	Corsham
Land off St George's Road, Semington, Melksham, Wilts	PL/2022/01367	18	0	0	0		0	10	8	0	0	0	0	Melksham CA Remainder
Land off Station Road Westbury	17/07548/FUL	32	32	55	0		22	10	0	0	0	0	0	Westbury
Land off the B4069 East of Barrow Farm, Langley Burrell, Chippenham	PL/2022/04681	230	0	0	0		0	0	81	114	35	0	0	Chippenham

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Land Rear of 54 Woodmarsh, North Bradley	PL/2021/09739	23	0	0	0		0	0	0	0	0	12	11	Trowbridge
Land south east of Trowbridge	15/04736/OUT	2500	0	0	0		0	0	0	0	60	120	160	Trowbridge
Land South of Broad Town Primary School, Broad Town Road, Broad Town, SN4 7RE	19/03874/OUT	10	0	0	0		0	0	0	0	0	0	0	Royal Wootton Bassett & Cricklade CA Remainder
Land South of Sandhole Lane Westbury	PL/2022/09817	67	0	0	0		0	30	37	0	0	0	0	Westbury
Land South of Trowbridge	20/00379/OUT	180	0	0	0		0	0	0	0	0	30	40	Trowbridge
Land South of Western Way, Melksham, Wilts	PL/2022/08504	210	0	0	0		0	0	0	0	0	50	50	Melksham
Land South of Western Way, Melksham, Wilts	PL/2022/08504	38	0	0	0		0	0	0	0	0	0	0	Melksham
Land South West of Park Road, Malmesbury, Wiltshire	20/08341/OUT	26	0	0	0		0	13	10	0	0	0	0	Malmesbury
Land to East of Oxford Road, Calne, Wiltshire	N16.7209	13	13	187	0		13	0	0	0	0	0	0	Calne
Land to North West of Folly Farm, Warminster	PL/2021/11051	38	33	16	0		23	15	0	0	0	0	0	Warminster
Land to the east of Church View Sutton Benger Chippenham Wiltshire SN15 4FD	20/03876/OUT	24	0	0	0		0	0	0	0	0	24	0	Chippenham CA Remainder

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Land to the east of Storey Mews, Malmesbury, SN16 0FH	PL/2021/04960	22	22	7	0		22	0	0	0	0	0	0	Malmesbury
Land to the East of Waitrose, A429, Malmesbury, Wiltshire	PL/2021/09852	26	0	0	0		0	0	0	0	0	10	10	Malmesbury
Land to the north of Whychurch Farm and to the south of Filands, Malmesbury	PL/2021/08453	71	0	0	0		0	0	0	0	0	12	25	Malmesbury
Land to the south of Chilvester Hill, Calne, Wiltshire SN11 0LR	PL/2022/05993	28	28	0	0		14	14	0	0	0	0	0	Calne
Land to the south of Church Lane, Upper Studley	18/10035/OUT	55	0	0	0		0	0	0	0	0	10	35	Trowbridge
Land West of Elizabeth Way and South of Middle Lane, Hilperton, Trowbridge	20/07751/FUL	68	0	0	0		0	40	28	0	0	0	0	Trowbridge
Land west of Semington Road, Melksham	PL/2023/00808	50	0	0	0		0	25	25	0	0	0	0	Melksham
Langley Park	19/12100/REM	329	0	0	0		0	52	195	69	13	0	0	Chippenham
Limpley Mill Lower Stoke Limpley Stoke Bath	PL/2022/03452	12	0	0	0		0	0	0	12	0	0	0	Bradford on Avon CA Remainder
Manor Farm, The Street, Grittleton, SN14 6AN	21/01331/VAR	1	1	12	0		1	0	0	0	0	0	0	Chippenham CA Remainder
Phase 5, Land at Hunters Moon, Chippenham	21/01463/FUL	43	43	52	0		35	8	0	0	0	0	0	Chippenham

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RAF Yatesbury Jugglers Lane Yatesbury Wiltshire	N14.0153	41	0	0	0		0	0	0	0	0	0	0	Calne CA Remainder
Rowden Park - Crest Nicholson South West Phase 2 Patterdown Road Chippenham Wiltshire	19/11461/REM	64	64	0	0		58	6	0	0	0	0	0	Chippenham
Rowden Park Patterdown Road Chippenham	N17.8786	4	4	98	0		4	0	0	0	0	0	0	Chippenham
Rowden Park Patterdown Road Chippenham Wiltshire	N14.12118	491	0	0	0		0	0	25	54	100	100	96	Chippenham
Rowden Park, Patterdown Road, Chippenham	PL/2023/01773	140	0	0	0		0	44	50	46	0	0	0	Chippenham
Rowden Park, Patterdown Road, Chippenham (Redcliffe Phase 3)	20/02326/REM	191	0	0	0		31	45	45	45	25	0	0	Chippenham
Rowden Park, Patterdown Road, Chippenham, Wiltshire	PL/2021/06001	4	4	8	0		4	0	0	0	0	0	0	Chippenham
Royal Arthur Park, Westwells Road	N10.4093	45	45	176	0		0	45	0	0	0	0	0	Corsham
The United Church & Community Buildings, Church Street, Trowbridge, BA14 8DZ	18/03338/FUL	20	20	5	3		16	4	0	0	0	0	0	Trowbridge
Timber Yard, Real World Studios, Mill Lane, Box, Corsham, Wiltshire, SN13 8PD	20/08387/VAR	20	20	0	0		0	10	10	0	0	0	0	Corsham CA Remainder

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Total Large permitted and 'subject to S106' sites		**9,910**	**890**	**1,897**	**3**		**767**	**917**	**1,258**	**908**	**588**	**728**	**835**	
Court Street	5/LPA/21	8	0	0	0		0	0	8	0	0	0	0	Trowbridge
Land at West Street	5/LPA/55	12	0	0	0		0	0	0	0	0	0	0	Warminster
Land off Oldfield Road	5/LPA/49	30	0	0	0		0	0	0	0	0	0	0	Westbury
Quemerford House & Mill	2/LPA/14	28	0	0	0		0	0	0	0	0	0	0	Calne
Rear of Westbury Road	5/LPA/58	3	0	0	0		0	0	0	2	0	0	0	Warminster
South East Trowbridge	WCS/NW6	100	0	0	0		0	0	0	0	0	0	0	Trowbridge
Station Road	5/LPA/59	30	0	0	0		0	0	0	0	0	0	0	Warminster
Total adopted Strategic Sites and District Local Plan allocations		**211**	**0**	**0**	0		**0**	**0**	**8**	**2**	**0**	**0**	**0**	
Bore Hill Farm	H2.8	70	0	0	0		0	0	0	0	0	30	31	Warminster
Land off the A363 at White Horse Business Park	H2.2	175	0	0	0		0	0	0	0	0	40	80	Trowbridge
Patterdown and Rowden - Small Extension Sites (South West Chippenham)	CH1	41	0	0	0		0	0	0	0	0	41	0	Chippenham
Total adopted Site Allocations Plan allocations		**216**	**0**	**0**	**0**		**0**	**0**	**0**	**0**	**0**	**81**	**80**	
Derelict Cottage Farm	NP/NW26	15	0	0	0		0	0	0	0	0	0	0	Royal Wootton Bassett & Cricklade CA Remainder

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Dogridge Garage Site (1)	NP/NW22	4	0	0	0		0	0	0	0	0	0	0	Royal Wootton Bassett & Cricklade CA Remainder
Former Youth Centre	NP/NW29	5	0	0	0		0	0	0	0	0	0	0	Royal Wootton Bassett & Cricklade CA Remainder
Heli-Beds	NP/NW38	8	0	0	0		0	0	0	0	0	0	0	Trowbridge CA Remainder
Land at Northcote	NP/NW27	15	0	0	0		0	0	0	0	0	0	0	Royal Wootton Bassett & Cricklade CA Remainder
Land off Wesley Lane	NP/NW39	27	0	0	0		0	0	0	0	0	7	20	Trowbridge CA Remainder
Land to the West of The Bakehouse Site HS6	NP/NW13	4	0	0	0		0	0	0	0	0	0	0	Chippenham CA Remainder
Middle Farm, Corsham Road, Whitley	NP/NW40	18	0	0	0		0	0	0	0	0	6	12	Melksham CA Remainder
Redundant Farmyard Site Adjacent to Fordlands Site HS3	NP/NW10	4	0	0	0		0	0	0	0	0	0	0	Chippenham CA Remainder
Redundant Farmyard Site Adjacent to The Old Parlour Site HS2	NP/NW09	6	0	0	0		0	0	0	0	0	0	0	Chippenham CA Remainder

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Redundant Farmyard Site at Mermaid Farm Site HS4	NP/NW11	3	0	1	0		0	0	0	0	0	0	0	Chippenham CA Remainder
Sopworth Lane	NP/NW33	45	0	0	0		0	0	0	0	0	15	30	Malmesbury CA Remainder
The Elms	NP/NW35	4	0	0	0		0	0	0	0	0	0	0	Malmesbury CA Remainder
The Vicarage	NP/NW34	2	0	0	0		0	0	0	0	0	0	0	Malmesbury CA Remainder
Thickwood field, north of Thickwood Estate	NP/NW37	5	0	0	0		0	0	0	0	0	0	0	Corsham CA Remainder
Tuner's Lane	NP/NW31	25	0	0	0		0	0	0	0	0	12	13	Malmesbury CA Remainder
Total emerging and adopted Neighbourhood Plan allocations		**190**	**0**	**1**	**0**		**0**	**0**	**0**	**0**	**0**	**40**	**75**	
Windfall – brownfield small sites							**23**	**65**	**89**	**103**	**109**	**110**	**111**	
Windfall – brownfield large sites							**2**	**22**	**52**	**71**	**78**	**86**	**87**	
Windfall – greenfield small sites							**10**	**32**	**43**	**48**	**50**	**51**	**52**	

Site Address	Site reference	Committed dwellings outstanding at April 2024	Units under construction	Completions to date	Losses to date		2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	Settlement / CA Remainder
South Wiltshire HMA														
Grand Total		**2,629**	**450**	**360**	**53**		**320**	**414**	**462**	**356**	**179**	**267**	**295**	
Total Small permitted sites (see Appendix 2)		**303**	**81**	**11**	**13**		**42**	**83**	**44**	**25**	**10**	**3**	**1**	
141 Castle Street, Salisbury	20/06868/ PNCOU	60	60	0	0		60	0	0	0	0	0	0	Salisbury
40 BLUE BOAR ROW, SALISBURY, SP1 1DA	PL/2022/04289	11	0	0	0		0	0	0	11	0	0	0	Salisbury
42-44 CHIPPER LANE, SALISBURY, SP1 1BG	PL/2023/02891	3	3	9	0		3	0	0	0	0	0	0	Salisbury
Alderbury Park Caravan And Camping Site, Southampton Road, Whaddon, SP5 3HB	PL/2021/11771	13	0	0	0		0	0	0	0	0	7	6	Southern Wiltshire CA Remainder
Beaumont Business Park, Woodlands Road, Mere, Warminster, Wiltshire, BA12 6BT	20/07469/OUT	70	0	0	0		0	0	0	0	0	10	30	Mere
Building Known As Finch House The Old Manor Hospital Wilton Road Salisbury Wiltshire	19/11110/FUL	21	21	0	0		21	0	0	0	0	0	0	Salisbury
Castle View Rest Home, 8 Old Castle Road, Salisbury, Wilts, SP1 3SF	PL/2022/06171	15	15	0	14		15	0	0	0	0	0	0	Salisbury
E V Naish Ltd Crow Lane Wilton Salisbury Wiltshire	S/2003/1016	61	0	0	0		0	0	0	0	0	11	25	Wilton
Erskine Barracks	S11.0517	52	0	0	0		0	0	0	0	0	0	0	Wilton

Site Address	Site reference	Committed dwellings outstanding at April 2024	Units under construction	Completions to date	Losses to date		2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	Settlement / CA Remainder
Kings Gate Phase 4, West of Archers Gate Development, Amesbury, Wiltshire	19/07304/REM	25	25	274	0		25	0	0	0	0	0	0	Amesbury
Land Adjacent Quarryfield Industrial Estate Castle Street Mere BA12 6LA	20/11079/FUL	39	39	0	0		0	39	0	0	0	0	0	Mere
Land at Chicklade Road, Hindon, Wiltshire	PL/2021/09623	31	0	0	0		0	0	0	0	0	16	15	Tisbury CA Remainder
Land at H3.7 adj to 'Warren's Folly' and Vets, Larkhill Road, Durrington, SP4 8DR	20/04397/OUT	14	0	0	0		0	0	0	0	0	14	0	Amesbury
Land at Hillbrush Company Ltd Woodlands Road Mere	S17.0085	8	8	66	0		8	0	0	0	0	0	0	Mere
Land at Romsey Road, Whiteparish, Salisbury	PL/2022/09532	25	0	0	0		0	0	0	0	0	12	13	Southern Wiltshire CA Remainder
Land at Westside Close, Old Sarum, SP4 6BX	PL/2021/09567	46	0	0	0		0	10	36	0	0	0	0	Salisbury
Land North of Netherhampton Road, Salisbury, Wiltshire	PL/2021/06594	106	65	0	0		25	60	21	0	0	0	0	Salisbury
Land south of Netherhampton Road Salisbury	19/05824/OUT	406	0	0	0		0	0	0	56	80	80	80	Salisbury
Land South of Netherhampton Road, Salisbury	PL/2021/08735	234	53	0	0		50	80	80	24	0	0	0	Salisbury

Site Address	Site reference	Committed dwellings outstanding at April 2024	Units under construction	Completions to date	Losses to date		2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	Settlement / CA Remainder
Land to the north west of Fugglestone Red and Bemerton Heath	S12.0814	341	0	0	0		0	58	155	127	0	0	0	Salisbury
Land to the North West of Fugglestone Red and Bemerton Heath, Salisbury	PL/2022/07678	63	63	0	0		40	23	0	0	0	0	0	Salisbury
South of Rowbarrow	20/00337/FUL	86	0	0	0		0	14	50	22	0	0	0	Salisbury
Stratford Court, Stratford Road, Salisbury, SP1 3JH	PL/2022/05365	17	17	0	26		17	0	0	0	0	0	0	Salisbury
Tisbury Sports Centre, Weaveland Road, Tisbury, Salisbury, SP3 6HJ	PL/2022/00855	13	0	0	0		0	0	6	7	0	0	0	Tisbury
Total Large permitted and 'subject to S106' sites		**1,760**	**369**	**349**	**40**		**264**	**284**	**348**	**247**	**80**	**150**	**169**	
Bulbridge	3/LPA/36	45	0	0	0		0	0	0	0	0	0	0	Wilton
Central Car Park	WCS/S5	200	0	0	0		0	0	0	0	0	0	0	Salisbury
Churchfields & Engine Sheds	WCS/S4	200	0	0	0		0	0	0	0	0	0	0	Salisbury
Total adopted Strategic Sites and District Local Plan allocations		**445**	**0**	**0**	**0**		**0**	**0**	**0**	**0**	**0**	**0**	**0**	
Clover Lane	H3.6	45	0	0	0		0	0	0	0	0	20	25	Durrington
Total adopted Site Allocations Plan allocations		**45**	**0**	**0**	**0**		**0**	**0**	**0**	**0**	**0**	**20**	**25**	
Knighton Road (Site 4)	NP/S15	6	0	0	0		0	0	0	0	0	3	3	Wilton CA Remainder

Site Address	Site reference	Committed dwellings outstanding at April 2024	Units under construction	Completions to date	Losses to date		2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	Settlement / CA Remainder
Land at Hillcrest Paddock	NP/S19	5	0	0	0		0	0	0	0	0	0	0	Tisbury CA Remainder
Land at Red House Farm	NP/S20	1	0	0	0		0	0	0	0	0	0	0	Tisbury CA Remainder
Land between Glebe Hall and Primary School	NP/S12	13	0	0	0		0	0	0	0	0	0	6	Southern Wiltshire CA Remainder
Manor Farm Road (Site 5)	NP/S16	3	0	0	0		0	0	0	0	0	2	1	Wilton CA Remainder
Station Works	NP/S11	60	0	0	0		0	0	0	0	0	0	0	Tisbury
Total emerging and adopted Neighbourhood Plan allocations		**76**	**0**	**0**	**0**		**0**	**0**	**0**	**0**	**0**	**2**	**7**	
Windfall – brownfield small sites							**10**	**28**	**39**	**45**	**47**	**48**	**48**	
Windfall – brownfield large sites							**1**	**6**	**15**	**21**	**23**	**25**	**26**	
Windfall – greenfield small sites							**4**	**12**	**16**	**18**	**19**	**19**	**20**	

Appendix 2: Small sites contributing to the deliverable supply

See accompanying document.

Appendix 3: Deliverability summary for sites considered to be deliverable in the forthcoming 5-year period

Site Address	Site reference	Planning status (at 31 March 2024)	Settlement / CA Remainder	5-year deliverability summary
East Wiltshire HMA				
Agricutural land, Park Farm, Seend Cleeve, Melksham, SN12 6PX	20/02213/FUL	Full permission	Devizes CA Remainder	Completion is expected in 2024/25. The development includes one self-build unit and ten White Horse Affordable Passivhaus homes, with construction having commenced in September 2023.
Bath Road Business Centre	NP/E12	Neighbourhood Plan	Devizes	No recent planning activity or known development plans suggest that the allocation will be delivered in the Local Plan period.
Blackberry Lane - Site A6	NP/E18	Neighbourhood Plan	Devizes CA Remainder	No recent residential planning applications or known plans at the site, but potential for the site to be developed in the medium-to-long term.
Devizes Community Hospital, New Park Road, Devizes, Wilts, SN10 1EF	PL/2022/08744	S106	Devizes	Outline planning permission was granted in January 2025. A Reserved Matters application has yet to be submitted. As a result, the Council has adopted a cautious approach, forecasting first completions from 2029/30.
Drummond Park	WCS/E2	Strategic site	Tidworth	See E/11/0001/OUT and 21/02122/REM.
Drummond Park Ludgershall SP11 9RT	E/11/0001/OUT	Outline permission	Tidworth/ Ludgershall	See 21/02122/REM.
Drummond Park Ludgershall SP11 9RT	21/02122/REM	Full permission	Tidworth/ Ludgershall	Development of the site is underway, with the first phase of dwellings already completed. In appeal decision APP/Y3940/W/24/3340811, the Planning Inspector considered the projected yield acceptable. Paragraph 92 of the decision states: 'The build-out rate of 65 dwellings per annum (dpa) adopted by the Council is based on a pro rata calculation from the first year's delivery. This is a reasonable basis for the calculation and no clear evidence has been provided otherwise. The dwellings should therefore remain in the supply."
Elm Tree business area	NP/E44	Neighbourhood Plan	Marlborough CA Remainder	No recent planning activity or known development plans suggest that the allocation will be delivered in the Local Plan period.
Empress Way	H1.1	DPD Allocation	Tidworth	See E13.0234, 18/04346/REM and 20/06554/FUL

Site Address	Site reference	Planning status (at 31 March 2024)	Settlement / CA Remainder	5-year deliverability summary
Garage and Old Dairy, New Park Street	NP/E09	Neighbourhood Plan	Devizes	No recent planning activity or known development plans suggest that the allocation will be delivered in the Local Plan period. Landowner indicates the site will be retained for commercial purposes.
Grafton Road	NP/E22	Neighbourhood Plan	Pewsey CA	Site has been allocated by the local community which indicates the site's suitability for development. Timescales for development not known, but there is a reasonable prospect that the site will be available and could be viably developed by 2038.
H1 Land at Lavington Lane	NP/E32	Neighbourhood Plan	Devizes CA Remainder	See 20/09350/OUT and PL/2021/11899.
Hales Farm	NP/E27	Neighbourhood Plan	Devizes CA Remainder	No recent planning activity or known development plans suggest that the allocation will be delivered in the Local Plan period.
Hales Farm, The Green, Urchfont, SN10 4QU	19/11986/FUL	Full permission	Devizes CA Remainder	The remaining dwellings completed in 2024/25, as confirmed by council tax records.
Hedges House, Mill Lane, West Lavington, Devizes SN10 4HS	PL/2021/11543	Full permission	Devizes CA Remainder	A Commencement Notice was submitted on 21/02/2024, indicating a start date of 26/02/2024. Google Street View imagery from July 2024 (viewed from the A360) confirms that the existing dwellings have been demolished. On 21/01/2025, pre-commencement conditions were discharged.
Highfield, The Common, Marlborough, Wilts, SN8 1DL	E18.11905	Full permission	Marlborough	Figures shown in the trajectories are based on a bed spaces-to-dwellings ratio in accordance with the PPG. C2 use - 12 additional bed spaces. Evidence of commencement sent to the council in January 2022 but development not progressed.
Land adjacent to Empress Way Ludgershall	E13.0234	Outline permission	Ludgershall	See 18/04346/REM.
Land Adjacent to Empress Way Ludgershall Wiltshire	18/04346/REM	Full permission	Tidworth/ Ludgershall	According to the developer's survey response dated 17/10/2024, the remaining 20 dwellings are scheduled to be built in 2025/26.
Land at Alcudia, The Ham	NP/E25	Neighbourhood Plan	Devizes CA Remainder	No recent residential planning applications or known plans at the site, but potential for the site to be developed in the medium-to-long term.

Site Address	Site reference	Planning status (at 31 March 2024)	Settlement / CA Remainder	5-year deliverability summary
Land at Barton Dene	NP/E36	Neighbourhood Plan	Marlborough	No recent residential planning applications. However, intention is to bring forward in conjunction with the Local Plan allocation on the adjacent site as agreed in the SoCG relating to Policy 46 (Land off Barton Dene, Marlborough).
Land At Empress Way, Ludgershall	20/06554/FUL	S106	Tidworth/ Ludgershall	A resolution to grant planning permission was made at committee on 10/08/2022, subject to the completion of a Section 106 agreement, which is now at its final stages. An Extension of Time (EoT) is in place until 12/06/2025. The build-out rate, with a maximum annual yield of 52 units, reflects the developer survey submitted in October 2024. This yield was deemed acceptable by the Planning Inspector in appeal decision APP/Y3940/W/24/3340811. Paragraph 111 of the decision states: "This site has a resolution to grant full planning permission, dating from August 2022. The delay in securing permission is related to nutrient neutrality. Because of the delays, further information and amendments to the proposal are required. Material in this regard has been submitted. There remain unresolved objections but the principles of the proposal have been agreed. Full permission is therefore likely to be forthcoming in a relatively timely manner. The housebuilder is the same as for the adjacent Phase 1 of the same scheme. This constitutes clear evidence that the dwellings will come forward within the five years and should therefore remain in the supply."
Land at Kelham Gardens	NP/E38	Neighbourhood Plan	Marlborough	Full planning application PL/2023/02738 approved on 11 April 2025 for 9 dwellings.
Land at Marshall Road, Devizes, Wiltshire	PL/2021/07203	Outline permission	Devizes	See PL/2023/05033.
Land at Marshall Road, Devizes, Wiltshire	PL/2023/05033	Full permission	Devizes	A Commencement Notice was submitted on 17/04/2024, with a start date of 23/04/2024. All pre-commencement conditions have been discharged, and construction is currently underway. Forecasts are based on the developer's survey response dated 18/10/2024. This timeline is considered achievable, as Vistry has previously delivered an average of 72 dwellings per annum over three years (excluding the start-up year) at a comparable site - Westbury Sailing Lake (application ref. 17/12194/REM).

Site Address	Site reference	Planning status (at 31 March 2024)	Settlement / CA Remainder	5-year deliverability summary
Land at Sandleaze Farm, Worton, Wiltshire	20/07932/OUT	Outline permission	Devizes CA Remainder	See PL/2022/08551.
Land at Sandleaze Farm, Worton, Wiltshire	PL/2022/08551	Full permission	Devizes CA Remainder	A Commencement Notice was submitted on 28/09/2023, with a start date of 23/10/2023. Wiltshire Council mapping confirms that the site is well under construction.
Land at the Spring	NP/E33	Neighbourhood Plan	Devizes CA Remainder	Outline application PL/2023/10388 for up to 14 dwellings given resolution to grant permission at planning committee on 19/09/2024. S106 agreement being finalised.
Land east of Reed Place, Rowde, SN10 2GX	PL/2021/07576	Full permission	Devizes CA Remainder	A Commencement Notice was submitted on 08/01/2024, with the same date listed as the start of works. Given this, it is considered reasonable to expect completion of the 10-dwelling site in 2025/26.
Land north of Quakers Road, Devizes, Wiltshire SN10 2FH	21/02477/OUT	Outline permission	Devizes	Reserved matters application PL/2024/03117 for 54 dwellings was received on 26/03/2024 (prior to the 2024 base date) and approved on 17/12/2024. A Commencement Notice was submitted on 23/01/2025, with a start date of 17/02/2025. Given this timeline, first completions in 2025/26 are considered achievable.
Land off Cherry Orchard	NP/E37	Neighbourhood Plan	Marlborough	See PL/2021/11719.
Land off Coate Road, Devizes	PL/2021/04774	Outline permission	Devizes	In appeal decision APP/Y3940/W/22/3312268, the Inspector concluded that the absence of a five-year supply of deliverable housing sites triggers the presumption in favour of sustainable development. As such, the delivery of this site was deemed necessary to help address the shortfall. Reserved matters application PL/2024/09259 for 200 dwellings was approved on 26/03/2025. The yield forecast reflects the average delivery rate achieved by Bellway on other sites in Wiltshire over the past five years. The remaining DoC applications for pre-commencement conditions are currently under consultation, and it is therefore considered realistic for the first units to be completed on site by 2026/27.
Land off Firs Hill Way - Site A3	NP/E19	Neighbourhood Plan	Devizes CA Remainder	No recent residential planning applications or known plans at the site, but potential for the site to be developed in the medium-to-long term.
Land off Hillworth Road	NP/E05	Neighbourhood Plan	Devizes	Outline application PL/2022/00867 for 59 dwellings granted at appeal on 16 October 2023.

Site Address	Site reference	Planning status (at 31 March 2024)	Settlement / CA Remainder	5-year deliverability summary
Land off Lavington Lane,Devizes, West Lavington	20/09350/OUT	Outline permission	Devizes CA Remainder	See PL/2021/11899.
Land opposite Sawmills	NP/E31	Neighbourhood Plan	Devizes CA Remainder	No recent planning activity or known development plans suggest that the allocation will be delivered in the Local Plan period.
Land South of Lavington Lane, West Lavington	PL/2021/11899	Full permission	Devizes CA Remainder	Reserved matters application PL/2021/11899 for 50 dwellings was approved on 30/05/2022. All pre-commencement conditions have been discharged, and construction is underway. As of April 2024, completions have been observed on site, with council tax records confirming occupancy for these properties.
Land to the east of Lavington School	NP/E35	Neighbourhood Plan	Devizes CA Remainder	No recent residential planning applications or known plans at the site, but potential for the site to be developed in the medium-to-long term.
Land to the north of Marshall Road, Devizes, Wilts	PL/2022/05360	Outline permission	Devizes	Reserved matters application PL/2024/09128 was received on 07/10/2024 and is currently under consultation. As a result, the Council has adopted a cautious approach, forecasting first completions by 2029/30.
Land to the north of Marshall Road, Devizes, Wiltshire	E16.12285	Outline permission	Devizes	See PL/2022/05360.
Land West of Hillworth Road / John Rennie Close, Devizes, Wiltshire, SN10 5HD	PL/2022/00867	Outline permission	Devizes	Inspector concluded in appeal decision APP/Y3940/W/23/3317362 that the lack of a five-year supply of deliverable housing sites results in the presumption in favour of sustainable development. Therefore, the delivery of this site was considered necessary to help address the shortfall. However, without the submission of a reserved matters application at the 2024 base date, first delivery has been forecast for 2029/30.
Lottage Farm	NP/E39	Neighbourhood Plan	Marlborough CA Remainder	Outline application 21/01004/OUT for up to 32 dwellings approved on 19/09/2024 with signed S106 agreement. Therefore, first completions by 2029/30 is considered a realistic prospect.
Magistrates Court, Elcombe Gardens	NP/E11	Neighbourhood Plan	Devizes	1no. dwelling constructed under 18/03773/FUL. No known further development anticipated.
Marlborough Resource Centre, Cherry Orchard, Marlborough	PL/2021/11719	S106	Marlborough	A resolution to grant permission was made at Committee on 22/02/2024. The Section 106 agreement is progressing. Forecasts allow for discharge of conditions and site preparation

Site Address	Site reference	Planning status (at 31 March 2024)	Settlement / CA Remainder	5-year deliverability summary
Marlborough Road Site	NP/E01	Neighbourhood Plan	Pewsey CA	Site has been allocated by the local community which indicates the site's suitability for development. Timescales for development not known, but there is a reasonable prospect that the site will be available and could be viably developed by 2038.
Parnham Coaches, 31 Andover Road, Ludgershall	20/02272/FUL	S106	Tidworth/ Ludgershall	A resolution to grant permission was made at committee on 22/02/2024, with the decision notice issued on 12/12/2024. All pre-commencement conditions have been discharged. A commencement notice was submitted on 12/03/2025, confirming a start date of 17/03/2025. As such, initial completions are anticipated in 2025/26.
Railway Cuttings, Hillworth Road	NP/E07	Neighbourhood Plan	Devizes	Timescales for development longer term, but there is a reasonable prospect that the site will be available and could be viably developed by 2038.
Ryeleaze Field - Site A5	NP/E21	Neighbourhood Plan	Devizes CA Remainder	No recent residential planning applications or known plans at the site, but potential for the site to be developed in the medium-to-long term.
Seymour Court, Blackmans Lane, Burbage, SN8 3TW	PL/2022/06850	Full permission	Pewsey CA	Pre-commencement conditions have been discharged under applications PL/2024/07653, PL/2024/07476, and PL/2024/05176. As a result, demolition of the existing building is considered feasible by 2025/26, with new unit completions anticipated in the subsequent years.
South of the "Meadows", Hartmoor Road.	NP/E10	Neighbourhood Plan	Devizes	No recent planning activity or known development plans suggest that the allocation will be delivered in the Local Plan period. Site owner has indicated they will not be pursuing development on this site.
Southcliffe	NP/E34	Neighbourhood Plan	Devizes CA Remainder	Site has been allocated by the local community which indicates the site's suitability for development. Timescales for development not known, but there is a reasonable prospect that the site will be available and could be viably developed by 2038.
St Peters Junior School, The Parade, Marlborough, SN8 1LQ	PL/2021/03930	Full permission	Marlborough	Full application (PL/2021/03930) approved for 15 dwellings and is currently under construction, with first 7 units forecast to complete in 2025/26.
Stonebridge House, Nursteed Road	NP/E03	Neighbourhood Plan	Devizes	Timescales for development longer term, but there is a reasonable prospect that the site will be available and could be viably developed by 2038.
Village Hall, Mill Street	NP/E45	Neighbourhood Plan	Devizes CA Remainder	No recent planning activity or known development plans suggest that the allocation will be delivered in the Local Plan period.

Site Address	Site reference	Planning status (at 31 March 2024)	Settlement / CA Remainder	5-year deliverability summary
Wadworth Warehouse, Northgate St	NP/E16	Neighbourhood Plan	Devizes	No recent planning activity or known development plans suggest that the allocation will be delivered in the Local Plan period. Landowner indicates the site will be retained for commercial purposes.
Whole of Garden Trading Est	NP/E13	Neighbourhood Plan	Devizes	No recent planning activity or known development plans suggest that the allocation will be delivered in the Local Plan period. Town council have indicated that the site will be retained for commercial purposes.
Wildmans Garage	NP/E30	Neighbourhood Plan	Devizes CA Remainder	Planning application PL/2024/07035 for five dwellings refused on 29/11/2024. Taken to appeal and awaiting decision.
Wiltshire Police, George Lane, Marlborough, Wiltshire, SN8 4DB	20/07915/OUT	Outline permission	Marlborough	Not enough information available to include in the 5-year supply.
York Place, St Martins, Marlborough	PL/2023/03305	S106	Marlborough	A resolution to grant permission was made at Committee on 21/03/2024. The Section 106 was signed and full permission granted on 16/04/2025. First completion forecast in 2027/28 to allow for conditions to be discharged and for demolition of existing building.
North & West Wiltshire HMA				
"Land at Sutton Lane Sutton Benger SN15 4RR"	20/03487/FUL	Full permission	Chippenham CA Remainder	The agent/developer returned a developer survey (Oct 2024) which confirms the build out rate that is set out in this trajectory. The Commencement of Development Notice on file notes that construction commenced in August 2023.
"Land South of Low Lane, Calne, SN11 8EQ"	PL/2022/09034	Full permission	Calne	Reserved Matters application approved in September 2023. The Commencement of Development notice returned by the developer is dated 16/09/2024.
1-4 Avon Heights, Monkton Hill, Chippenham, SN15 1ER	21/00286/PNCOU	Full permission	Chippenham	Development has commenced, with site fenced, site office installed and conversion works underway.
17 Station Hill, Chippenham, SN15 1EQ	20/06500/FUL	Full permission	Chippenham	Change of use proposal. Development of the site has commenced as per walk-by site visit completed by Wiltshire Council in November 2024.

Site Address	Site reference	Planning status (at 31 March 2024)	Settlement / CA Remainder	5-year deliverability summary
26 Fore Street, Trowbridge	21/01148/FUL	Full permission	Trowbridge	Commencement notice received from developer in March 2022. Condition 5 (Mechanical Ventilation Heat Recovery) discharged April 23.
3 High Street, Warminster, BA12 9AG	19/04315/FUL	Full permission	Warminster	Application not coming forward after demolition of existing building. New application under consultation for 11 flats (PL/2024/04333).
54 Woodmarsh	NP/NW32	Neighbourhood Plan	Trowbridge CA Remainder	Outline application for 23 units under consultation(PL/2021/09739)
6 Orchard Court, Arches Lane, Malmesbury, SN16 0ED	PL/2024/00117	Full permission	Malmesbury	Development comprises 1 additional bed spaces in C2 use. Figures shown in the trajectories are based on a bed spaces-to-dwellings ratio in accordance with the PPG.
7, 8 and 9 Back Street	W07.3403	Full permission	Trowbridge	Permission extant, but expected to be developed over the longer term.
AB Carter Haulage Contractors, 14 Happy Land	2/LPA/11	District Local Plan Allocation	Malmesbury CA Remainder	20/09696/FUL - application for 10 dwellings approved in September 2022.
AB Carter Haulage Contractors, 14 Happy Land	NP/NW06	Neighbourhood Plan	Malmesbury CA Remainder	20/09696/FUL - application for 10 dwellings approved in September 2022.
Ashton Street Centre, Ashton Street	PL/2021/09909	S106	Trowbridge	S106 agreed and application subsequently approved on 18/10/2024. No DoC applications submitted, but with detailed permission on the site, it is a realistic prospect to expect first completions to deliver within 5 years. Additionally, Wiltshire Council established Stone Circle (the applicant) as a Local Housing Company in 2019 to provide additional housing solutions complementing the Council's internal efforts.
Backbridge Farm Site 3A & Punters Farm Site 15	NP/NW01	Neighbourhood Plan	Malmesbury	16/06401/FUL - Application for 201 dwellings approved on 22/10/2021. COD dated 28/02/2022
Bore Hill Farm	H2.8	DPD Allocation	Warminster	Planning application for 80 dwellings under consultation (PL/2022/07120). Application for 95 dwellings withdrawn (PL/2022/00473).

Site Address	Site reference	Planning status (at 31 March 2024)	Settlement / CA Remainder	5-year deliverability summary
Bugley Barton Farm, Land South of Victoria Road, Warminster	17/01463/FUL	Full permission	Warminster	Approved on 22nd October 2022. Site has been sold on to Keepmoat Homes in August 2024 who are promoting site on their website. S73 application submitted by Keepmoat in February 2025 to vary the approved scheme, deed of variation to amend the approved S106 agreement accordingly, and discharge of conditions related to ecology and lighting. Extension of time agreed to 1 July 2025.
Burton Hill Site 6, Malmesbury PCC Site 11 & Malmesbury PCC Site 10	NP/NW02	Neighbourhood Plan	Malmesbury	PL/2021/04960 - RM application for 21 dwellings approved in February 2022
Caring Hands (Wiltshire) Battlelake Farm Braydon SN5 0AA	20/00806/FUL	Full permission	Royal Wootton Bassett & Cricklade CA Remainder	Development comprises 6 additional bed spaces in C2 use. Figures shown in the trajectories are based on a bed spaces-to-dwellings ratio in accordance with the PPG.
Church Farm, Church Street, Hilperton, Trowbridge, Wiltshire	20/09998/FUL	Full permission	Trowbridge CA Remainder	Developer survey confirms build out to be complete by end of 2024/25.
Church Lane	H2.4	DPD Allocation	Trowbridge	Outline permission (18/10035/OUT) permitted in June 2024 for 'up to 55 dwellings'.
Clarks Mill and Mill House Stallard Street Trowbridge Wiltshire BA14 8HH	PL/2022/00462	Full permission	Trowbridge	Last part of development.
Cotswold Community School Cotswold Community Ashton Keynes Wiltshire	N16.2609	Outline permission	Malmesbury CA Remainder	Reserved application (21/02520/REM) was approved on 15/12/2022. Variation of condition application (PL/2024/05339) to amend approved materials was approved on 15/01/2025. Commencement of development notice was submitted to the Council and dated 12/08/2023.
Cotswold Community, Ashton Keynes, SN6 6QU	21/02520/REM	Full permission	Malmesbury CA Remainder	A Developer survey returned by the agent/developer confirms that they anticipate the whole development to be completed by 2026

Site Address	Site reference	Planning status (at 31 March 2024)	Settlement / CA Remainder	5-year deliverability summary
Court Orchard / Cassways	H2.13	DPD Allocation	Westbury CA Remainder	Reserved matters for 31 dwellings approved in Jan 2024 (PL/2023/07170).
Court Street	5/LPA/21	District Local Plan Allocation	Trowbridge	Prior Approval PL/2024/05743 from offices to 8 dwellings approved on 02/08/2024.
Courtfield House, Polebarn Road, Trowbridge, BA14 7EG	18/04656/FUL	Full permission	Trowbridge	COD Notice dated 06/03/2023. New build units expected to be completed in 2024/25. Conversion of Courtfield House expected to complete in the following year.
Derelict Cottage Farm	NP/NW26	Neighbourhood Plan	Royal Wootton Bassett & Cricklade CA Remainder	Site has been allocated by the local community which indicates the site's suitability for development. Timescales for development not known, but there is a reasonable prospect that the site will be available and could be viably developed by 2038.
Eastleigh Stables, Bishopstrow Road, Bishopstrow, Warminster, Wilts, BA12 9HW	PL/2021/04839	Full permission	Warminster CA Remainder	Development comprises 6 additional bed spaces in C2 use. Figures shown in the trajectories are based on a bed spaces-to-dwellings ratio in accordance with the PPG.
Elizabeth Way	H2.3	DPD Allocation	Trowbridge	Allocation taken forward by three developers: See 20/09701/FUL, PL/2021/08554 & 20/07751/FUL.
Elm Grove Way	H2.1	DPD Allocation	Trowbridge	Development had outline permission pre base date (19/11459/OUT - up to 261 dwellings) and subsequently reserved matters permission (PL/2022/09425 - 248 dwellings). Site has now commenced.
Elwood House, Former A429, Stanton St Quintin	20/11517/FUL	Full permission	Chippenham CA Remainder	The developer/agent has submitted a Commencement of Development Notice dated 06/03/2023. Wiltshire Council mapping shows that all 12 units have been completed.
Former AB Carter Haulage Contractors, 14 Happy Land, Ashton Keynes, Wiltshire, SN6 6PN	20/09696/FUL	Full permission	Malmesbury CA Remainder	Full planning application approved on 7th September 2022. Construction of the development had commenced as of September 2023 as per Google Street View imagery.
Former MOD Rudloe No. 2 Westwells Road Hawthorn Rudloe	N14.11354	Outline permission	Corsham CA Remainder	Development has not commenced on site due to outstanding conditions that are required for discharge relating to both the Outline and Reserved Matters permissions.

Site Address	Site reference	Planning status (at 31 March 2024)	Settlement / CA Remainder	5-year deliverability summary
Former MOD Rudloe No.2, Westwells Road, SN13 9RA	19/07339/REM	Full permission	Corsham CA Remainder	There has been a time-lag between the date at which the application was approved (11/06/2021) and the most recent correspondence on file between the applicant/agent and Wiltshire Council from February 2023 noting issues with signing s278 + need to discharge pre-commencement conditions.
Former Sydenhams Yard, Bradley Lane, Maiden Bradley, BA12 7JR	PL/2021/08100	Full permission	Warminster CA Remainder	Remaining dwellings to complete in 2024/25.
Former Wiltshire College, Cocklebury Road, Chippenham, SN15 3QD	PL/2022/03760	Full permission	Chippenham	This application sought approval for later living accommodation which constitutes planning use class C2. The agent confirms that the development is unlikely to be built out due to withdrawal of funding.
Former Wiltshire College, Cocklebury Road, Chippenham, SN15 3QD	PL/2022/03760	Full permission	Chippenham	Development comprises 69 additional bed spaces in C2 use. Figures shown in the trajectories are based on a bed spaces-to-dwellings ratio in accordance with the PPG.
Foundary Lane	2/LPA/18	District Local Plan Allocation	Chippenham	See Planning Application 19/12100/REM for 329 dwellings which was approved on 03/07/2023 with the Commencement of Development notice submitted to the Council dated 01/09/2023.
Gable House, 46 High Street, Malmesbury, SN16 9AT	20/06887/FUL	Full permission	Malmesbury	Full planning application approved in March 2023.
Garages at land West of 10 King Street Melksham SN12 6HD	20/02677/FUL	Full permission	Melksham	Although the council forecast delivery of units in 2025/26, clear that site is entering final stages of conversation and will likely complete in November 2024.
Goldenley Care Home Forest Lane Chippenham SN15 3YQ	19/06116/FUL	Full permission	Chippenham	Figures shown as a loss are based on a bed spaces-to-dwellings ratio of 1.83 in accordance with the 2011 Census figures. C2 use - 18 lost bed spaces equates to 10 dwelling equivalent. Net loss of 4 dwelling equivalent.

Site Address	Site reference	Planning status (at 31 March 2024)	Settlement / CA Remainder	5-year deliverability summary
Ground and First Floor Block C, The Pavilions, Windsor Road, Trowbridge, Wiltshire	PL/2021/07628	Full permission	Trowbridge	Site visit on 03 July 2024 shows photos of progress on site, with drywall up and kitchens fitted and therefore, expected to complete in 2024/2025.
Heywood House, Park Lane	W07.1377	Full permission	Westbury CA Remainder	Permission will have now expired - new dwellings do not seem to have been built out as per aerial imagery.
Hill House Nursing Home	N09.0362	Full permission	Malmesbury CA Remainder	Development comprises 12 additional bed spaces in C2 use. Figures shown in the trajectories are based on a bed spaces-to-dwellings ratio in accordance with the PPG.
Hooks Hill	NP/NW25	Neighbourhood Plan	Royal Wootton Bassett & Cricklade CA Remainder	20/04338/FUL - refurbishment of 25 flats and construction of 4 dwellings approve in December 2020. Construction underway/largely complete as per Google Street View (September 2023)
Innox Mills, Trowbridge	PL/2021/08064	S106	Trowbridge	Hybrid permission (PL/2021/08064) granted for full permission for 12 apartments and outline permission for 243 dwellings. The site's trajectory has been set out within Statement of Common Ground for the Wiltshire Local Plan Review allocation.
Kingston Mills, Kingston Road	W06.2394	Full permission	Bradford on Avon	1 remaining dwelling likely to be complete
Land At Ambulance Headquarters, Malmesbury Road, Chippenham, SN15 5LN	20/05495/FUL	Full permission	Chippenham	COD Notice dated 26/07/2024. All pre-commencement conditions discharged.
Land at Backbridge Farm, Malmesbury, Wiltshire	16/06401/FUL	Full permission	Malmesbury	Developer Survey (Oct 2024) states completion in 2025/26 and confirms build out rate.
Land At Broadfield Farm, Great Somerford, SN15 5EL	21/01950/FUL	Full permission	Malmesbury CA Remainder	Full planning application approved in March 2022. Unilateral Undertaking agreement completed in March 2025. The developer/agent submitted a Commencement of development Notice to the local authority dated 18/12/2023.

Site Address	Site reference	Planning status (at 31 March 2024)	Settlement / CA Remainder	5-year deliverability summary
Land at Burton Hill Burton Hill Malmesbury Wiltshire	16/11603/OUT	Outline permission	Malmesbury	A Commencement of Development notice dated 18/07/2022 was submitted to the local authority. WC mapping shows that the majority of the site has been built out as of May 2025.
Land at Chippenham Road, Lyneham, SN15 4PA	PL/2022/07119	Full permission	Royal Wootton Bassett & Cricklade CA Remainder	COD Notice dated 29/11/24. Bellway are advertising the site on their website. Forecast yields reflect developer survey from January 2025.
Land at Elizabeth Way, Hilperton,, Trowbridge	20/09701/FUL	Full permission	Trowbridge	Commencement notice received September 2024. Site visit in May 2025 confirms highway works undertaken, internal road layout started and several plots are under construction. Forecasts in line with developer survey.
Land at Elm Grove, Drynham Lane, Trowbridge, Wiltshire, BA14 0PL	19/11459/OUT	Outline permission	Trowbridge	The Reserved Matters application (PL/2022/09425 - 248 dwellings) was submitted prior to the trajectories base date (submitted on 7/12/2022) and approved on 05/12/2024. The subsequent Commencement of Development Notice for the development is dated 20/01/2025. Site visit in April 25 confirmed groundworks were being undertaken on site.
Land at Filands Road / Jenners Lane, Malmesbury, SN16 9GT	PL/2023/00958	Full permission	Malmesbury	COD Notice dated 15/01/2024. Correspondence on file from developer confirming first occupation in December 2024. Yields comparable to adjacent sites also built out by Bloor (Land South of Filands)
Land at Green Farm, Chippenham Road, Lyneham SN15 4PA	19/03199/OUT	Outline permission	Royal Wootton Bassett & Cricklade CA Remainder	The Reserved Matters application for up to 200 dwellings was approved January 2024 (PL/2022/07119) and the subsequent Commencement of Development notice is dated 22/11/2024.
Land at Grove Farm Bincknoll Lane Royal Wootton Bassett Swindon Wiltshire SN4 8BD	18/06442/FUL	Full permission	Royal Wootton Bassett	The full planning application was approved on 07/02/2019. Google Street View imagery from August 2023 shows completions on site. 2025 Wiltshire Council mapping shows development mostly/if not fully built out.
Land at Hunters Moon Chippenham Wiltshire	16/12493/FUL	Outline permission	Chippenham	Site under construction and nearing completion.
Land at Hunters Moon Chippenham Wiltshire	N18.0401	Full permission	Chippenham	Approved in July 2018. Remaining plots in location of sales office and car park.

Site Address	Site reference	Planning status (at 31 March 2024)	Settlement / CA Remainder	5-year deliverability summary
Land at Hunters Moon Chippenham Wiltshire	N16.12493	Full permission	Chippenham	Developer survey confirms that this phase of Hunters Moon development is now complete (dated: 17/10/2024)
Land at Hunters Moon, Chippenham	20/06824/REM	Full permission	Chippenham	A developer survey (December 2024) confirms that this phase of development is now complete.
Land at North Chippenham, Hill Corner Road, East of A350, Chippenham	N/12/00560/OUT	Outline permission	Chippenham	Various Reserved Matters applications have been approved for several different phases/parcels of the overall development (18/01102/REM, 17/07413/REM,18/08316/REM,18/04224/REM, 17/08741/REM, 18/07826/REM, 18/01610/REM)
Land at North Chippenham, Hill Corner Road, West of A350, Chippenham	20/11468/REM	Full permission	Chippenham	Reserved Matters application (20/11468/REM) approved in November 2021. Development mostly built out as per Wiltshire Council's mapping.
Land at Northcote	NP/NW27	Neighbourhood Plan	Royal Wootton Bassett & Cricklade CA Remainder	Site has been allocated by the local community which indicates the site's suitability for development. Timescales for development not known, but there is a reasonable prospect that the site will be available and could be viably developed by 2038.
Land at Patterdown Road	16/09277/OUT	Outline permission	Chippenham	See 19/00098/REM.
Land at Patterdown Road, Chippenham	19/00098/REM	Full permission	Chippenham	Developer survey (October 2024), remaining 17 dwellings to be completed after HV diversion.
Land at Phase 2, Star Ground, Station Road, Holt, Wiltshire.	PL/2021/09777	Full permission	Bradford on Avon CA Remainder	COD notice dated 20/03/2023.
Land at Pound Farm South View Lyneham Wiltshire	20/02387/OUT	Outline permission	Royal Wootton Bassett & Cricklade CA Remainder	Commencement of Development notice on file is dated 08/08/2022.
Land at Pound Farm, South View, Lyneham	PL/2021/09817	Full permission	Royal Wootton Bassett & Cricklade CA Remainder	Reserved Matters application (PL/2021/09817) approved in March 2022. Commencement of development in August 2022. Non-Material Amendment to amend the materials of certain plots approved in December 2023. Google Streetview imagery from June 2023 shows completions on site. Wiltshire Council Mapping (May 2025) shows development mostly (if not completely) built out.

Site Address	Site reference	Planning status (at 31 March 2024)	Settlement / CA Remainder	5-year deliverability summary
Land at Purton Road, Swindon	20/10523/OUT	Outline permission	Royal Wootton Bassett & Cricklade CA Remainder	Outline permission was granted at appeal on 23/11/2023. The Inspector concluded in appeal decision APP/Y3940/W/21/3275053 that the lack of a five-year supply of deliverable housing sites results in the presumption in favour of sustainable development. Therefore, the delivery of this site was considered necessary to help address the shortfall. There has not been a Reserved Matters application submitted as of yet (however a pre-app response in relation to the RM was issued Nov 2024).
Land at Rawlings Farm, Cocklebury Lane, Chippenham, Wiltshire, SN15 3LR	15/12351/OUT	Outline permission	Chippenham	Outline consent for housing, employment, primary school and associated infrastructure granted October 2021. Variation application submitted April 2025 to vary layout and highways currently under consideration. Two Reserved Matters applications are currently submitted and undetermined in relation to this site: PL/2024/09507 (for 454 dwellings) and PL/2024/09507 (for 196 dwellings) for housing aspects of the development. Delivery anticipated to be outside the immediate five year period whilst variation on outline permission is being considered.
Land at Regents Park, Calne	20/07659/OUT	Outline permission	Calne	There is currently a Reserved Matters application (PL/2024/08991) under consideration. A revised site masterplan was submitted in January 2025 in response to consultation comments (including Highways). If this application approved in the 25/26 period, commencement would likely take place in 26/27.
Land at Restrop Road	NP/NW30	Neighbourhood Plan	Royal Wootton Bassett & Cricklade CA Remainder	Site complete
Land at Restrop Road, Purton, SN5 4BP	PL/2023/02576	Full permission	Royal Wootton Bassett & Cricklade CA Remainder	COD Notice dated 31/01/2024.
Land at Restrop Road, Purton, Swindon, Wiltshire, SN5 4BP	21/01155/OUT	Outline permission	Royal Wootton Bassett & Cricklade CA Remainder	Reserved Matters application (PL/2023/02576) which includes a discharge of condition application for several outline planning conditions submitted in March 2023 and approved in February 2024. Commencement of development notice on file dated 31/01/2024.
Land at Saltersford Lane, Chippenham	PL/2022/06612	Outline permission	Chippenham	The Reserved Matters Application (PL/2024/11691) is currently under consultation. The initial Outline application was allowed at appeal (APP/Y3940/W/21/3275053), where the inspector concluded that the lack of a five-year supply of deliverable housing sites results in the presumption in favour of sustainable development, with the site helping to address the shortfall.

Site Address	Site reference	Planning status (at 31 March 2024)	Settlement / CA Remainder	5-year deliverability summary
Land at Semington Road, Melksham, Wilts	20/01938/OUT	Outline permission	Melksham	The Reserved Matters application (PL/2022/02749) was approved in May 2023. Commencement of Development notice on file dated 21/08/2023.
Land at Semington Road, Melksham, Wilts	PL/2022/02749	Full permission	Melksham	Site under construction with completions in 2024/25.
Land at Showell Farm, Patterdown Road, Showell, Chippenham, SN15 2NT	18/04241/OUT	Outline permission	Chippenham	Reserved Matters application (PL/2022/07442) was approved 01/12/2023 and the subsequent Commencement of Development Notice is dated 01/07/2024.
Land at Showell Farm, Patterdown Road, Showell, Chippenham, SN15 2NT	PL/2022/07442	Full permission	Chippenham	Development comprises 74 additional bed spaces in C2 use. Figures shown in the trajectories are based on a bed spaces-to-dwellings ratio in accordance with the PPG. COD Notice dated: 01/07/2024
Land at Showell Nurseries Showell Chippenham Wiltshire SN15 2NU	17/08554/OUT	Outline permission	Chippenham CA Remainder	Commencement of Development Notice dated 17/02/2025.
Land at Showell Nurseries, Showell, Chippenham, Wiltshire, SN15 2NU	20/11654/REM	Full permission	Chippenham	Duplicate reserved matters application PL/2023/06727, validated 08 August 2023, approved 29 August 2024. There is a Commencement of Development notice on file from the developer/agent that is dated 17/02/2025. Site visit on 19 May 2025 saw site prep work underway, with a few plots approaching oversite level.
Land at Silver Street Calne Wiltshire	N16.4124	Full permission	Calne	Approved in February 2018. COD dated 19/03/2018

Site Address	Site reference	Planning status (at 31 March 2024)	Settlement / CA Remainder	5-year deliverability summary
Land at the proposed West Warminster Urban Extension North of Victoria Road & to the West of Bath Road Comprising approx. 84 hectares Warminster Wilt	15/01800/OUT	Outline permission	Warminster	Strategic site allocation from the Wiltshire Core Strategy, being built out by Persimmon Homes. Phase 1 (145 dwellings) - see permission record PL/2021/07207. Phase 2 - reserved matters application PL/2022/08898 for 168 dwellings validated 16/11/2022 . Natural England ratified the ecology team's HRA AA with no objection subject to securing the mitigation proposed by Persimmon which provided a comprehensive approach to ensure the floating wetland achieves the nutrient reductions required to meet phosphorus neutrality requirements; Wiltshire Council as the competent authority, signed off the HRA and subsequently approved the application on 21/05/2024. Reserved matters for phase 3 of the site for 193 dwellings was validated on 07/05/24 and had an accompanying Nutrient Neutrality Assessment and Mitigation Strategy which follows the approach approved at phase 2. Permission was granted on 12 December 2024. Forecasts in line with developer survey. Persimmon capable of achieving yields - on the Castlemead site in Trowbridge (650 dwellings, same HMA), they averaged 116 completions per annum (not including start-up and wind-down years).
Land at The Street	NP/NW36	Neighbourhood Plan	Chippenham CA Remainder	PL/2024/03115 Reserved Matters for up to 71 dwellings approved in January 2025 (pursuant to outline 20/10972/OUT)
Land at The Street, Hullavington	20/10972/OUT	Outline permission	Chippenham CA Remainder	The Reserved Matters application (PL/2024/03115) for the 71 dwellings was approved on 08/01/2025. Commencement of Development Notice dated 10.03.2025. Trajectories have been inputted corresponding to the Developer Survey which was received from the applicant/agent and dated 25/10/2024.
Land at West Street	5/LPA/55	District Local Plan Allocation	Warminster	No applications submitted for residential development at the site in recent years.
Land at Westbury Sailing Lake Station Road Westbury Wiltshire	W17.1314	Outline permission	Westbury	Reserved Matters application was approved in March 2019 (17/12194/REM) for 285 units. The development is largely complete and as such, the remaining 15 units in the outline permission are unlikely to be implemented.
Land at Westbury Sailing Lake, Station Road, Westbury, Wiltshire,	W17.12194	Full permission	Westbury	Site nearing completion.

Site Address	Site reference	Planning status (at 31 March 2024)	Settlement / CA Remainder	5-year deliverability summary
Land East of Damask Way and East of Upper Marsh Road and North of Smallbrook Lane, Warminster BA12 9PP	17/12348/OUT	Outline permission	Warminster	Reserved Matters application (20/07214/REM) pursuant to 17/12348/OUT was withdrawn by the applicant.
Land North of Folly Farm Warminster	19/09428/FUL	Full permission	Warminster	COD notice dated 05/04/2021.
Land north of Grovelands Way Warminster BA12 8TB (Extra care element)	W17.5360	Outline permission	Warminster	17/05360/OUT varied to 19/07198/VAR. RM for zones A,B,Ea,Eb submitted in June 2023 - PL/2023/04318. Ongoing phosphate issue to be resolved. Most recent correspondence on file from August 2023. Email from agent noting development has not commenced as of 25/10/2024. Development comprises 85 additional bed spaces in C2 use. Figures shown in the trajectories are based on a bed spaces-to-dwellings ratio in accordance with the PPG.
Land north of Grovelands Way Warminster BA12 8TB (Retirement bungalows)	19/07198/VAR	Outline permission	Warminster	Reserved matters application PL/2023/00956 submitted February 2023 for retirement bungalows (Zone D). Revised plans submitted in June/July 2023. Applicants secured credits for nutrient neutrality to ensure a positive Appropriate Assessment and to allow permission to be granted. Application approved 18/10/2024.
Land North of Grovelands Way, Warminster., BA14 8JN (Care home element)	PL/2021/03889	Full permission	Warminster	NMA submitted May 2023 by operator indicating willingness to progress development. Further NMA submitted in December 2024 and approved January 2025. Development comprises 62 additional bed spaces in C2 use. Figures shown in the trajectories are based on a bed spaces-to-dwellings ratio in accordance with the PPG.
Land North of Hill Corner Road Land Parcel B3 & B5 Chippenham Wiltshire	19/08039/VAR	Full permission	Chippenham	Variation of Conditions 1,5,6,7 application relevant to Reserved Matters application (18/07826/REM) was approved on 20/12/2019. Wiltshire Council mapping shows that the development is approaching completion.
Land north of St George's Road, Semington	19/02147/OUT	Outline permission	Melksham CA Remainder	Appeal granted for outline permission on 10/09/2021. Inspector concluded in appeal decision APP/Y3940/W/19/3236860 that the lack of a five-year supply of deliverable housing sites results in the presumption in favour of sustainable development. Reserved Matters (PL/2023/10561) approved 02/08/2024.

Site Address	Site reference	Planning status (at 31 March 2024)	Settlement / CA Remainder	5-year deliverability summary
Land North of Victoria Road & to the West of Bath Road, Phase 1, Land North of Victoria Road, Warminster	PL/2022/04343	Full permission	Warminster	COD Notice dated 01/11/2023. Google Street View (April 2024) shows several completions on site.
Land North of Webbs Court, Lyneham	PL/2021/11175	Outline permission	Royal Wootton Bassett & Cricklade CA Remainder	Reserved Matters application (PL/2023/09551) for 56 dwellings approved in October 2024. Estimated commencement in 2026/27. Development on neighbouring site being carried out by the same housebuilder at Pound Lane (PL/2021/09817) has commenced.
Land north of Westbury Road and west of Court Orchard, Bratton	PL/2021/05259	Outline permission	Westbury CA Remainder	Reserved Matters application (PL/2023/07170) for 31 dwellings was approved in January 2024.
Land north of Westbury Road and west of Court Orchard, Bratton, Wiltshire	PL/2023/07170	Full permission	Westbury CA Remainder	A Commencement of Development Notice was submitted to Wiltshire Council dated 01/05/2024. Developer Survey (October 2024) confirms build out rate.
Land off Frome Road, Upper Studley, Trowbridge	20/09659/FUL	Full permission	Trowbridge	Agent notes that development likely to commence in 2025.
Land off Melksham Road, Holt	PL/2022/03315	Outline permission	Bradford on Avon CA Remainder	Reserved matters application PL/2024/04625 refused at committee on design grounds on 05/02/2025. Application has now been taken to appeal, which is under consideration. Therefore, with no detailed permission existing on the site, delivery within five years can not be justified. However, with an appeal being lodged almost immediately and discharge of conditions applications being submitted soon after outline approval, the pro-active approach from the applicant to progress the application, gives confidence that an acceptable scheme could come forward from at least 2029/2030.
Land off of Elizabeth Way, Hilperton, Wiltshire, BA14 7	PL/2021/08554	Full permission	Trowbridge	Site under construction, forecasts in line with developer survey.

Site Address	Site reference	Planning status (at 31 March 2024)	Settlement / CA Remainder	5-year deliverability summary
Land off Oldfield Road	5/LPA/49	District Local Plan Allocation	Westbury	Saved former District Plan allocation
Land off Oxford Road	N11.3524	Outline permission	Calne	Wiltshire Council mapping (2025) shows that development is mostly (if not completely) built out as of May 2025.
Land off Park Road, Malmesbury, SN16 0QW	19/05898/OUT	Outline permission	Malmesbury	Outline planning permission (19/05898/OUT) granted at appeal (PP/Y3940/W/21/3286853) on 26th September 2022. Paragraph 74 of the Appeal decision stated “the Council’s approach to improving housing supply relies in part on sites such as these coming forward.”. Conditions attached to the Appeal decision set out reduced timescales to submit Reserved Matters application and to implement the permission. A Reserved Matters application (PL/2023/07797), was submitted before the 1-year deadline outlined above on 12th September 2023. Despite being recommended approval by the planning officer, the scheme was refused at planning committee and has subsequently been taken to appeal (APP/Y3940/W/25/3361710) with a start date of 24/03/2025. In the disputed sites discussion from another appeal decision ref: APP/Y3940/W/24/334081, the Inspector stated in Paragraph 104: "The speed of the submission of the reserved matters application and the special conditions requiring quick delivery point to a proposal that will likely come forward quickly. This is clear evidence of deliverability within five years and the dwellings should therefore remain in the supply.". However, given the application is currently at appeal, the council can not justify the delivery of a site within 5 years, but it is considered a realistic prospect that an acceptable scheme pursuant to the outline permission can be delivered in the plan period.
Land off Potley Lane, Corsham, Wiltshire, SN13 9RX	20/03234/FUL	Full permission	Corsham	Wiltshire Council mapping shows site complete in 2024/25.
Land off Silver Street and White Horse Way	N11.3628	Outline permission	Calne	Reserved Matters application (13/06774/REM) for 72 dwellings approved in August 2014. Wiltshire Council mapping shows that the development is mostly (if not completely) built out as of May 2025.

Site Address	Site reference	Planning status (at 31 March 2024)	Settlement / CA Remainder	5-year deliverability summary
Land off St George's Road, Semington, Melksham, Wilts	PL/2022/01367	Full permission	Melksham CA Remainder	Commencement notice submitted on 02/04/2024 with commencement date of 08/04/2024. As the site has commenced, it is realistic that the site will complete by 2026/27 as the council has forecast.
Land off Station Road Westbury Wiltshire	17/07548/FUL	Full permission	Westbury	Wiltshire Council mapping system shows site nearing completion (April 2025)
Land off the A363 at White Horse Business Park	H2.2	DPD Allocation	Trowbridge	Two applications relate to the allocation. Full planning application PL/2022/05426 (62 dwellings) under consultation. Outline application 20/03641/OUT (70 dwellings) - resolution to grant permission subject to signing of the s106 agreement (March 25).
Land off the B4069 East of Barrow Farm, Langley Burrell, Chippenham	PL/2022/04681	Outline permission	Chippenham	Outline permission granted at appeal (3309170) where the Inspector concluded that the site would help address the shortfall in housing and based on what they had heard at the appeal, that the site would be deliverable within 5 years. Reserved Matters application submitted in July 2024 (PL/2024/05355), so would have likely started being prepared prior to base date. Developer survey dated 20/11/2024 confirms projected build out rate based on two outlets on-site (Barratt and David Wilson Homes).
Land off Wesley Lane	NP/NW39	Neighbourhood Plan	Trowbridge CA Remainder	Full application currently live for 30 dwellings (PL/2022/05416).
Land Rear of 54 Woodmarsh, North Bradley	PL/2021/09739	S106	Trowbridge	Outline application given resolution to grant subject to S106 agreement on 13/04/2024. A series of EoTs have been agreed since then as outstanding issues related to the legal agreement are being resolved. This is reflected in the trajectory and likely delivery in the medium term.

Site Address	Site reference	Planning status (at 31 March 2024)	Settlement / CA Remainder	5-year deliverability summary
Land south east of Trowbridge	15/04736/OUT	S106	Trowbridge	Wiltshire Core Strategy allocation. Outline application currently live and has resolution to grant subject to legal agreement, most recently in January 2023. Due to length of time that has passed to agree the legal agreements on the site, changes to the various contributions have been negotiated, a revised Environmental Statement, BNG metrics, green infrastructure plans have been submitted in February 2024 which are currently subject to consultation. In November 2024 part of site was sold to Barratt and Redrow to operate further outlets from the site which will increase the likely build out rates. Developer survey from Persimmon (Oct 2024) was used to help inform forecasts for their parcels. Likely start date moved back from Persimmon forecast given outline permission not yet granted and discharge of conditions still required. Developer survey response has indicated Persimmon's Phase 1 reserved matters has been prepared and agreed through pre- app, and ready to be formally submitted simultaneously with grant of Outline.
Land South of Broad Town Primary School, Broad Town Road, Broad Town, SN4 7RE	19/03874/OUT	Outline permission	Royal Wootton Bassett & Cricklade CA Remainder	The application was approved at appeal on 27/05/2021. This appeal decision was challenged (for statutory review) however this challenge was unsuccessful. There have been no subsequent Reserved Matters application(s) submitted at the site to date (May 2025) and as such this permission has now expired.
Land South of Low Lane, Calne, Wiltshire, SN11 8EQ.	19/11601/OUT	Outline permission	Calne	The Reserved Matters application (PL/2022/09034) was granted in September 2023. The Commencement of Development notice was submitted to Wiltshire Council and dated 16/12/2024.
Land South of Sandhole Lane Westbury	20/11515/OUT	Outline permission	Westbury	Following the approval of the Outline application at appeal, the subsequent Reserved Matters application (PL/2022/09817) was approved in February 2024. The developer/agent submitted a Commencement of Development Notice to Wiltshire Council which was dated 02/09/2024.
Land South of Sandhole Lane Westbury	PL/2022/09817	Full permission	Westbury	Developer Survey (October 2024) confirms build out rate.
Land South of Trowbridge, Wiltshire	20/00379/OUT	Outline permission	Trowbridge	After initial refusal by Wiltshire Council, the outline application was approved at appeal in March 2024. There has not yet been a Reserved Matters application submitted as of 24/03/25. The site is currently being marketed and it is anticipated that after the site has been purchased, a Reserved Matters application will follow.

Site Address	Site reference	Planning status (at 31 March 2024)	Settlement / CA Remainder	5-year deliverability summary
Land South of Western Way, Melksham, Wilts	PL/2022/08504	Outline permission	Melksham	Outline application (PL/2022/08504) was approved on appeal in November 2023. Substantial weight was given to contribution of housing in the light of a 5 year HLS shortfall in the appeal decision. However no REM has been submitted by the developers as of April 2025.
Land South of Western Way, Melksham, Wilts	PL/2022/08504	Outline permission	Melksham	Outline application (PL/2022/08504) was approved on appeal in November 2023. Substantial weight was given to contribution of housing in the light of a 5 year HLS shortfall in the appeal decision. However no REM has been submitted by the developers as of April 2025. Development comprises 70 additional bed spaces in C2 use. Figures shown in the trajectories are based on a bed spaces-to-dwellings ratio in accordance with the PPG.
Land south of Westwells Road, Neston, Corsham	18/09884/OUT	Outline permission	Corsham CA Remainder	The outline application was approved at appeal on 26/04/2021. There has been no subsequent Reserved Matters submitted as of May 2025.
Land South West of Park Road, Malmesbury, Wiltshire	20/08341/OUT	Outline permission	Malmesbury	Reserved Matters application PL/2023/05471 approved on 19/09/2024 for 23 dwellings. However, the application was submitted prior to the April 2024 base date on 05/07/2023. A commencement notice has been submitted on the 25/09/2024 with a commencement date of 04/11/2024. A developer survey return in October 2024 forecasts full delivery of the site in 2025/26. The council has taken a cautious approach to spread the delivery over a two year period.
Land to East of Oxford Road, Calne, Wiltshire	N16.7209	Full permission	Calne	Site nearing completion.
Land to North West of Folly Farm, Warminster	PL/2021/11051	Full permission	Warminster	Developer survey from December 2024 confirms build out rate.
Land to the east of Church View Sutton Benger Chippenham Wiltshire SN15 4FD	20/03876/OUT	Outline permission	Chippenham CA Remainder	The outline application was approved in September 2022. There is currently a live application to amend the Section 106 Agreement to facilitate the option to provide an 'either 50% or 100% affordable housing' clause. However no Reserved Matters application has been submitted as of 25/03/2025.

Site Address	Site reference	Planning status (at 31 March 2024)	Settlement / CA Remainder	5-year deliverability summary
Land to the east of Storey Mews, Malmesbury, SN16 0FH	PL/2021/04960	Full permission	Malmesbury	Reserved Matters application approved on 14/02/2022. Commencement of development notice provided by the applicant/agent dated 18/07/2022. Wiltshire Council mapping shows that the development is mostly (if not totally) complete as of May 2025.
Land to the East of Waitrose, A429, Malmesbury, Wiltshire	PL/2021/09852	Outline permission	Malmesbury	The outline application was approved at appeal (March 2024) for the self-build development. There have been no Reserved Matters application submitted as of May 2025 in relation to any of the individual plots. The Local authority self-build register indicates unmet demand for this type of housing so reasonable to assume site will be delivered in medium term.
Land to the north of Whychurch Farm and to the south of Filands, Malmesbury	PL/2021/08453	Outline permission	Malmesbury	The Reserved Matters application (PL/2023/08687) was made valid on 26/10/2023. Revised drawings submitted following several requests for additional info from statutory consultees in March 2025.
Land to the south of Chilvester Hill, Calne, Wiltshire SN11 0LR	20/06684/OUT	Outline permission	Calne	20/06684/OUT was approved in February 2021. A subsequent Reserved Matters application (PL/2022/05993) was submitted in August 2022 and approved in February 2023.
Land to the south of Chilvester Hill, Calne, Wiltshire SN11 0LR	PL/2022/05993	Full permission	Calne	Site under construction.
Land to the south of Church Lane, Upper Studley	18/10035/OUT	S106	Trowbridge	S106 agreed and application subsequently approved on 07/06/2024. No reserved matters or discharge of condition applications yet submitted. There is not enough evidence to suggest the site will be delivered within 5 years at this stage.
Land West of Elizabeth Way and South of Middle Lane, Hilperton, Trowbridge	20/07751/FUL	Full permission	Trowbridge	Commencement notice received February 2025. Forecasts in line with developer survey.
Land West of Elizabeth Way, (Land SW of Hilperton Marsh) (HILPERTON GAP) Trowbridge Wiltshire	16/00672/OUT	Outline permission	Trowbridge	Reserved matters PL/2021/08554 approved 16/09/2022.

Site Address	Site reference	Planning status (at 31 March 2024)	Settlement / CA Remainder	5-year deliverability summary
Land west of Semington Road, Melksham	20/07334/OUT	Outline permission	Melksham	The subsequent Reserved Matters application was approved in August 2023 (PL/2023/00808). The developer/agent submitted a Commencement of Development notice dated 06/11/2023.
Land west of Semington Road, Melksham	PL/2023/00808	Full permission	Melksham	COD notice dated 06/11/2023.
Langley Park	N16.3515	Outline permission	Chippenham	The subsequent Reserved Matters application was approved for 329 dwellings in July 2023 (19/12100/REM). Conditions are currently being discharged. The Commencement Of Development notice, provided by the agent/developer is dated 01/09/2023
Langley Park	19/12100/REM	Full permission	Chippenham	CIL commencement notice completed on 14/08/2023 and states commencement date of 01/09/2023. The site includes 16 blocks of flats which can be worked on concurrently, hence the higher levels of completions forecast in in 2026/27. Forecasts reflect latest phasing plan from developer (received May 25) - plan includes anticipated completions dates for plots. Site visit on 19 May 25 confirms foundations being dug and drainage being installed.
Limpley Mill Lower Stoke Limpley Stoke Bath	PL/2022/03452	Full permission	Bradford on Avon CA Remainder	Full permission granted in May 2023. VAR to amend plan approved in April 2024 (PL/2023/11026). No COD on file as of April 2025
Longbridge Deverill Nursing Home, Church Street, Longbridge Deverill, Warminster, Wilts, BA12 7DJ	PL/2022/05421	Full permission	Warminster CA Remainder	Development comprises 9 additional bed spaces in C2 use. Figures shown in the trajectories are based on a bed spaces-to-dwellings ratio in accordance with the PPG.
Manor Farm, The Street, Grittleton, SN14 6AN	21/01331/VAR	Full permission	Chippenham CA Remainder	The majority of the development has now been completed as per previous trajectories. The remaining 1 dwelling is likely to be completed in 24/25 period.
Middle Farm, Corsham Road, Whitley	NP/NW40	Neighbourhood Plan	Melksham CA Remainder	Outline Planning application for 40 dwellings currently live (PL/2024/09725).

Site Address	Site reference	Planning status (at 31 March 2024)	Settlement / CA Remainder	5-year deliverability summary
Patterdown and Rowden - Small Extension Sites (South West Chippenham)	CH1	DPD Allocation	Chippenham	Strategic site allocated in the Chippenham Site Allocations Plan, being brought forward by Redcliffe Homes. PL/2024/02998 validated on 08/04/2024 for 41 dwellings (Full application). Revised plans received in October 2024 and again in February 2025 to address consultation feedback. Further work required in relation to Ecology, but no objections from Urban Design, Public Protection (subject to condition), Highways, Historic England, Education, National Highways, Waste, Housing, Drainage (subject to conditions).
Patterdown and Rowden (South West Chippenham)	CH1	DPD Allocation	Chippenham	Allocation in the Chippenham Site Allocations Plan.
Phase 5, Land at Hunters Moon, Chippenham	21/01463/FUL	Full permission	Chippenham	Developer Survey (Dec 2024) confirms that Phase 5 will be completed in 2025.
Quemerford House & Mill	2/LPA/14	District Local Plan Allocation	Calne	Former district LP allocation. No development progress in a number of years so unlikely to see further development from this site.
RAF Yatesbury Jugglers Lane Yatesbury Wiltshire	N14.0153	Full permission	Calne CA Remainder	VAR Permission 17/00154/VAR has expired and aerial imagery shows no signs of commencement (circa 2021). Site now for sale January 2025.
Rawlings Green	CH2	DPD Allocation	Chippenham	See outline application 15/12351/OUT.
Rear of Westbury Road	5/LPA/58	District Local Plan Allocation	Warminster	Outline application approved PL/2021/09067 for 2 dwellings approved on 10/06/2022. Reserved matters application PL/2024/04959 submitted on 31/05/2024. EoT agreed up to June 2025.
Rowden Park - Crest Nicholson South West Phase 2 Patterdown Road Chippenham Wiltshire	19/11461/REM	Full permission	Chippenham	Crest Phase 2 - being built out first. Crest forecast based on average of 50 dwellings per annum.
Rowden Park Patterdown Road Chippenham	N17.8786	Full permission	Chippenham	Redcliffe Phase 1/2. Original permission was for 114 dwellings, but reduced to 102 dwellings due to variation app PL/2021/06001. Redcliffe forecast based on average of 45 dwellings per annum. Site visit May 25 confirms site is complete.

Site Address	Site reference	Planning status (at 31 March 2024)	Settlement / CA Remainder	5-year deliverability summary
Rowden Park Patterdown Road Chippenham Wiltshire	N14.12118	Outline permission	Chippenham	Strategic site allocated in the Chippenham Site Allocations Plan. Being developed by Redcliffe Homes, Crest Nicholson and Bellway Homes; both Redcliffe and Crest had reserved matter applications approved at base date (also see N17.8786, PL/2021/06001, 20/02326/REM, 19/11461/REM, & PL/2023/01773). As of the base date, between the three outlets there were 6 further applications validated and awaiting determination, totalling 415 dwellings and a 60 bed care home (20/02334/REM, 20/02335/REM, 20/02381/REM, 20/02382/REM, 20/02383/REM & 20/02384/REM). Since the base date, 221 dwellings have been approved (20/02334/REM, varied under PL/2024/08632 - 87 dwellings, 20/02335/REM - 134). Other applications approved include infrastructure works and discharge of conditions. The same agent is working on behalf Redcliffe, Crest and Bellway, so progression of applications is being prioritised based on keeping all outlets with a continuing supply.
Rowden Park, Patterdown Road, Chippenham	PL/2023/01773	Full permission	Chippenham	Crest Phase 1 - following on from Phase 2. Crest forecast based on average of 50 dwellings per annum. Site visit in May 2025 saw over 50 units under construction.
Rowden Park, Patterdown Road, Chippenham (Redcliffe Phase 3)	20/02326/REM	Full permission	Chippenham	Redcliffe Phase 3. Redcliffe forecast based on average of 45 dwellings per annum. Site visit in May 2025 saw approximately 50 houses complete or under construction.
Rowden Park, Patterdown Road, Chippenham, Wiltshire	PL/2021/06001	Full permission	Chippenham	Redcliffe Phase 1/2 - variation app for N17.8786 (17/08786/REM). Additional 12 dwellings. Site visit in May 2025 saw all units complete.
Royal Arthur Park, Westwells Road	N10.4093	Full permission	Corsham	Retirement village where majority of site has been completed, with final two blocks of apartments to be commenced shortly. Rangeford Villages website confirms the launch of a new phase of 45 apartments, ready to move into from Autumn 2025.
Sopworth Lane	NP/NW33	Neighbourhood Plan	Malmesbury CA Remainder	Site is part of live planning application PL/2024/00865 for 45 dwellings
South East Trowbridge	WCS/NW6	Strategic site	Trowbridge	Forms part of South East Trowbridge WCS allocation. Appeal on this parcel dismissed in September 2022. Expectation is for this parcel to be delivered later in the development cycle of the wider allocation.

Site Address	Site reference	Planning status (at 31 March 2024)	Settlement / CA Remainder	5-year deliverability summary
Southwick Court	H2.6	DPD Allocation	Trowbridge	Outline application approved at appeal in March 2024. 20/00379/OUT
Station Road	5/LPA/59	District Local Plan Allocation	Warminster	No recent planning activity or known development plans to suggest that the allocation will be delivered in the Local Plan period.
Station Road	5/LPA/32	District Local Plan Allocation	Westbury	17/07548/FUL - FULL Application approved for 87 dwellings on 31/07/2019
Station Road	WCS/NW9	Strategic site	Westbury	See 'Westbury Sailing Lake'. Development almost if not fully built out
The United Church & Community Buildings Church Street Trowbridge Wiltshire BA14 8DZ	18/03338/FUL	Full permission	Trowbridge	Discussion with the estate agent (Davies and Davies) confirms that last few units are being finished off (May 25).
Timber Yard, Real World Studios, Mill Lane, Box, Corsham, Wiltshire, SN13 8PD	20/08387/VAR	Full permission	Corsham CA Remainder	The Commencement of Development notice provided by the agent/applicant was dated 20/02/2023.
Tuner's Lane	NP/NW31	Neighbourhood Plan	Malmesbury CA Remainder	Live planning application for 25 dwellings (PL/2023/09595).
Upper Studley	H2.5	DPD Allocation	Trowbridge	Full permission granted on 12/03/2024 - see 20/09659/FUL.
West of Warminster	WCS/NW7	Strategic site	Warminster	Urban extension has mostly come forward (aside from employment elements) - Outline Application (15/01800/OUT) approved in December 2020.
Works, Cocklebury Road	2/LPA/17	District Local Plan Allocation	Chippenham	There are currently no live planning applications for residential development at the site.

Site Address	Site reference	Planning status (at 31 March 2024)	Settlement / CA Remainder	5-year deliverability summary
South Wiltshire HMA				
141 Castle Street, Salisbury	20/06868/PNCOU	Full permission	Salisbury	The building has been converted into flats and is now occupied. Council tax records confirm occupancy for the majority of apartments, and the estate agent's website indicates that the remaining units are "ready to move into."
40 BLUE BOAR ROW, SALISBURY, SP1 1DA	PL/2022/04289	Full permission	Salisbury	Full planning permission was granted on 20/10/2023.
42-44 CHIPPER LANE, SALISBURY, SP1 1BG	PL/2023/02891	Full permission	Salisbury	The remaining three flats completed in 2024/25, as indicated by council tax records.
82 VICTORIA COURT, STRATFORD ROAD, SALISBURY, SP1 3NP	PL/2024/00118	Full permission	Salisbury	Figures shown in the trajectories are based on a bed spaces-to-dwellings ratio in accordance with the PPG. C2 use - 1 additional bed space
Albany House The Square Tisbury SP3 6JP	20/09285/FUL	Full permission	Tisbury	Figures shown in the trajectories are based on a bed spaces-to-dwellings ratio in accordance with the PPG. C2 use - 2 additional bed spaces
Alderbury Park Caravan And Camping Site, Southampton Road, Whaddon, Salisbury, SP5 3HB	PL/2021/11771	Full permission	Southern Wiltshire CA Remainder	Phosphate and nitrate mitigation issues remain unresolved between the developer and the council, with no updates since 28 April 2022. No Discharge of Conditions (DoC) applications have been submitted to date. As a result, the council has adopted a cautious approach, and first completions are not anticipated until 2029/30.
Beaumont Business Park, Woodlands Road, Mere, Warminster, Wiltshire, BA12 6BT	20/07469/OUT	Outline permission	Mere	Since the outline approval was granted, no DoCs or reserved matters applications have been submitted. As a result, the council has taken a cautious approach, with first completions not expected until 2029/30.

Site Address	Site reference	Planning status (at 31 March 2024)	Settlement / CA Remainder	5-year deliverability summary
Building Known As Finch House The Old Manor Hospital Wilton Road Salisbury Wiltshire	19/11110/FUL	Full permission	Salisbury	The flats were complete in 2024/25 with council tax records confirming occupation.
Bulbridge	3/LPA/36	District Local Plan Allocation	Wilton	Site is a saved allocation which indicates the site's suitability for development. There has been recent interest in the site but has not come to fruition. Timescales for development not known, but there is a reasonable prospect that the site will be available and could be viably developed by 2038.
Castle View Rest Home, 8 Old Castle Road, Salisbury, Wilts, SP1 3SF	PL/2022/06171	Full permission	Salisbury	Google Earth satellite imagery shows the new care home nearing completion (at roof level) as of November 2024. Development comprises 28 additional bed spaces in C2 use. Figures shown in the trajectories are based on a bed spaces-to-dwellings ratio in accordance with the PPG.
Central Car Park	WCS/S5	Strategic site	Salisbury	Full application PL/2024/06047 for 47 retirement apartments was refused on 23/12/2024. The application is now under appeal and is due to proceed through the hearing process. There have been no further major residential planning applications at the site, so dwellings are not expected to be delivered until the later years of the Local Plan period.
Churchfields & Engine Sheds	WCS/S4	Strategic site	Salisbury	There have been no further major residential planning applications submitted for this allocation.
Clover Lane	H3.6	DPD Allocation	Amesbury	Full planning application PL/2024/02283 includes eastern portion of the site and adjacent land to the north for 68 dwellings. Application was submitted on 01/03/2024 and remains under consultation.
E V Naish Ltd Crow Lane Wilton Salisbury Wiltshire	S/2003/1016	Outline permission	Wilton	Reserved matters application PL/2021/03251 is currently under consultation, having been validated on 16/03/2021. In February 2025, the applicant requested an EoT until September 2025 to allow for additional technical work. Following this, the application is expected to be brought forward to the committee for determination on 18 September.

Site Address	Site reference	Planning status (at 31 March 2024)	Settlement / CA Remainder	5-year deliverability summary
Erskine Barracks	S11.0517	Outline permission	Wilton	The components of the UKLF development covered by the 2011 outline permission are now complete. The remainder of the site is subject to a full planning application (PL/2021/08160) for an innovation centre, veterans' flats, and additional dwellings. This application is currently being progressed but has not yet been determined.
Former Sports Centre	NP/S17	Neighbourhood Plan	Tisbury	See PL/2022/00855.
Fugglestone Red	WCS/S3	Strategic site	Salisbury	See S12.0814.
Kings Gate	WCS/S1	Strategic site	Amesbury	Last parcel being built out, see 19/07304/REM.
Kings Gate Phase 4, West of Archers Gate Development, Amesbury, Wiltshire	19/07304/REM	Full permission	Amesbury	Remaining dwellings completed in 2024/25, as confirmed by council tax records.
Knighton Road (Site 4)	NP/S15	Neighbourhood Plan	Wilton CA Remainder	Full planning application PL/2023/00911 for 6 dwellings remains under consultation. There is an EoT until the 16/05/2025 to finalise the drainage details.
Land Adjacent Quarryfield Industrial Estate Castle Street Mere BA12 6LA	20/11079/FUL	Full permission	Mere	Development comprises 70 additional bed spaces in C2 use. Figures shown in the trajectories are based on a bed spaces-to-dwellings ratio in accordance with the PPG. Google Earth satellite imagery from June 2024 shows that the care home was under construction. Based on this progress, it is reasonable to expect completion by 2025/26.
Land at Chicklade Road, Hindon, Wiltshire	PL/2021/09623	S106	Tisbury CA Remainder	A resolution to grant permission was made at Committee on 27/04/2023. The Section 106 agreement is still being finalised, with an Extension of Time (EoT) in place until the end of October 2025. Consequently, site delivery is forecast to commence from 2029/30.
Land at H3.7 adj to 'Warren's Folly' and Vets, Larkhill Road, Durrington, SP4 8DR	20/04397/OUT	Outline permission	Amesbury	Reserved matters application is yet to be submitted. As a result, the Council has adopted a cautious approach, forecasting completion in 2029/30.

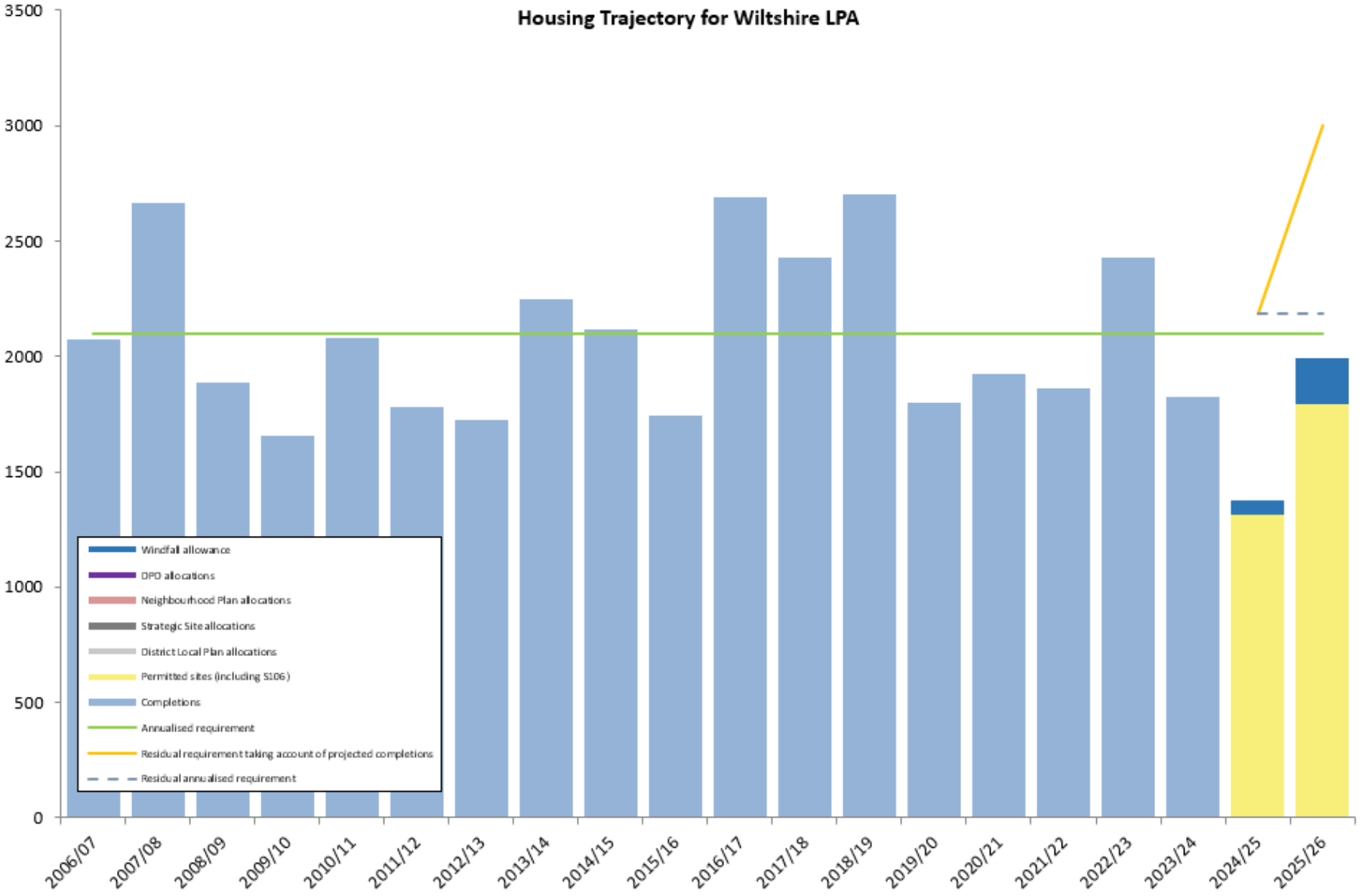
Site Address	Site reference	Planning status (at 31 March 2024)	Settlement / CA Remainder	5-year deliverability summary
Land at Hillbrush Company Ltd Woodlands Road Mere	S17.0085	Full permission	Mere	Remaining 8 units completed in 2024/2025. Council tax records are present for these units.
Land at Hillcrest Paddock	NP/S19	Neighbourhood Plan	Tisbury CA Remainder	No recent residential planning applications or known plans at the site, but potential for the site to be developed in the medium-to-long term.
Land at Red House Farm	NP/S20	Neighbourhood Plan	Tisbury CA Remainder	No recent residential planning applications or known plans at the site, but potential for the site to be developed in the medium-to-long term.
Land at Romsey Road, Whiteparish, Salisbury	PL/2022/09532	S106	Southern Wiltshire CA Remainder	The Section 106 agreement has been finalised, and the decision notice was issued on 10/06/2024. A Reserved Matters application has not yet been submitted. As a result, the Council has adopted a cautious approach, forecasting first completions from 2029/30.
Land at Rowbarrow	H3.4	DPD Allocation	Salisbury	See 20/00337/FUL.
Land at The Hill Brush Co Ltd Woodlands Road Mere Warminster	S14.6780	Outline permission	Mere	See S17.0085.
Land at Westside Close, Old Sarum, SP4 6BX	PL/2021/09567	Outline permission	Salisbury	Reserved matters application PL/2023/04526 for 46 dwellings was approved on 11/07/2024. However, as the application was submitted on 06/06/2023, it was under consideration prior to the 2024 base date. A Commencement Notice was submitted on 23/01/2025, with a start date of 17/02/2025. All pre-commencement conditions have been discharged. Given the efficient progress made since the reserved matters approval, it is considered reasonable to expect first completions in 2025/26.
Land between Glebe Hall and Primary School	NP/S12	Neighbourhood Plan	Southern Wiltshire CA Remainder	Pre-app for 50 dwellings at the site in 2017 - no further details available. This suggests there is potential and interest for the site to be delivered in the latter years of the Local Plan Period through a new scheme.

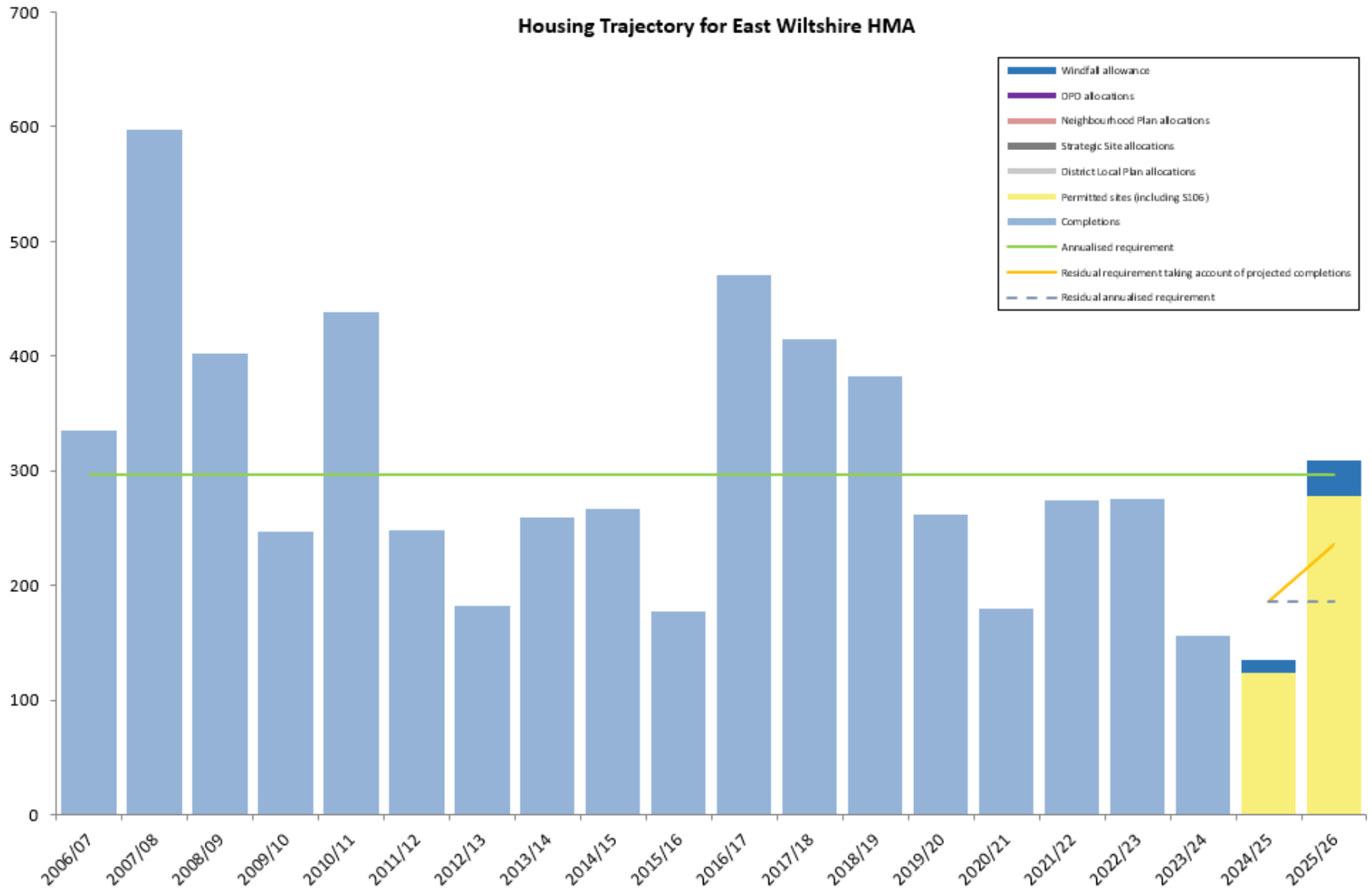
Site Address	Site reference	Planning status (at 31 March 2024)	Settlement / CA Remainder	5-year deliverability summary
Land immediately to the south and west of the Archers Gate Housing Development Amesbury	S15.2530	Outline permission	Amesbury	See 19/07304/REM.
Land North of Netherhampton Road, Salisbury, Wiltshire	PL/2021/06594	Full permission	Salisbury	A Commencement Notice was submitted on 20/02/2023, with a start date of 23/02/2023. Google Earth Street View imagery from November 2024 shows that a significant portion of the dwellings has been constructed up to roof level.
Land off Chicklade Road	NP/S18	Neighbourhood Plan	Tisbury CA Remainder	See PL/2021/09623.
Land south of Netherhampton Road Salisbury	19/05824/OUT	Outline permission	Salisbury	Reserved matters application PL/2023/11196 for 406 dwellings is currently under consultation. Pre-commencement conditions for this phase will need to be discharged once the decision notice is issued. The Council has secured phosphate credits and the developer has made contributions to purchase these credits for a positive Appropriate Assessment to allow permission for the reserved matters to be granted. Contributions to secure habitat mitigation through the SAMM strategy required for the New Forest protected sites are to be achieved by a Unilateral Undertaking. First completions in 2027/28 are considered achievable. Yield projections are informed by the developer's recent local build-out history.
Land South of Netherhampton Road, Salisbury	PL/2021/08735	Full permission	Salisbury	A Commencement Notice was submitted on 09/01/2023. Google Earth satellite imagery from November 2024 shows several dwellings at roof level and nearing completion. Yield projections are based on the developers recent local build-out history.

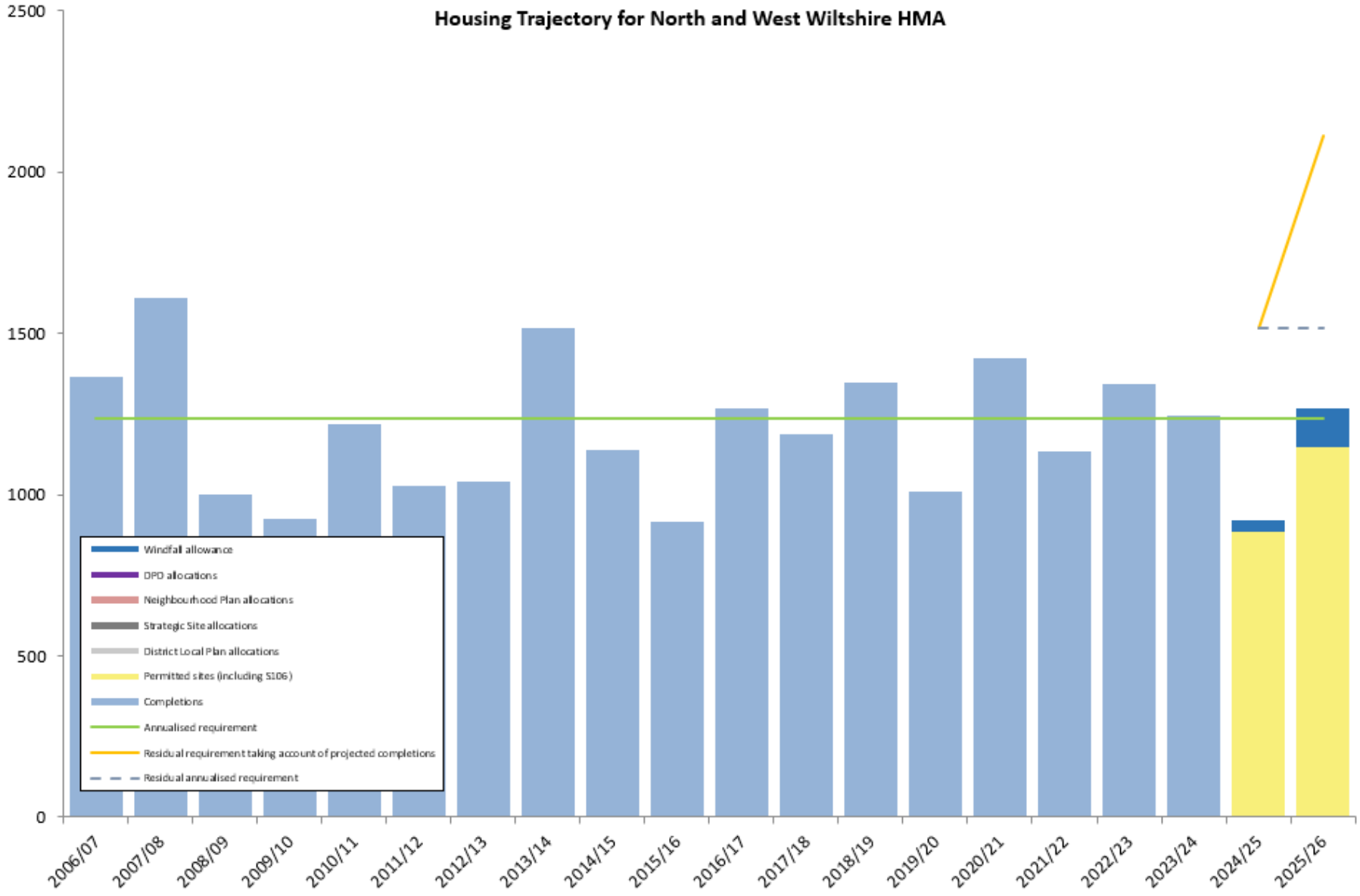
Site Address	Site reference	Planning status (at 31 March 2024)	Settlement / CA Remainder	5-year deliverability summary
Land to the north west of Fugglestone Red and Bemerton Heath	S12.0814	Outline permission	Salisbury	Outline element of the allocation. Both Phase B3 (PL/2023/05287 - 176 dwellings) and Phase A2B (PL/2023/10980 - 164 dwellings) were submitted prior to base date, but were held up with phosphates. However, both are now resolved with PL/2023/05287 receiving permission on 15/04/2025 and PL/2023/10980 on 23/05/2025. Both B3 and A2B will be built concurrently, utilising two brands. Forecasts in line with developer survey (May 25). Despite the delay in planning approvals, Persimmon have still averaged over 120 completions per annum on site (not including start up year).
Land to the North West of Fugglestone Red and Bemerton Heath, Salisbury, Wilts P	PL/2022/07678	Full permission	Salisbury	Phase A2 of development. Wiltshire Council mapping shows over half the phase is complete (April 2025).
Larkhill Road	H3.7	DPD Allocation	Amesbury	See 20/04397/OUT.
Longhedge (Old Sarum)	WCS/S2	Strategic site	Salisbury	Site built out.
Manor Farm Road (Site 5)	NP/S16	Neighbourhood Plan	Wilton CA Remainder	Application PL/2023/00909 for three dwellings awaiting completion of S106 agreement
Netherhampton Road	H3.1	DPD Allocation	Salisbury	See 19/05824/OUT.
North of Netherhampton Road	H3.3	DPD Allocation	Salisbury	See PL/2021/06594.
Odstock Hospital	3/LPA/41	District Local Plan Allocation	Salisbury	No recent planning activity or known development plans suggest that the allocation will be delivered in the Local Plan period.
Old Manor Hospital	3/LPA/11	District Local Plan Allocation	Salisbury	See 19/11110/FUL - last remaining part of allocation.
RAF Baverstock	3/LPA/38	District Local Plan Allocation	Wilton CA Remainder	No recent planning activity or known development plans suggest that the allocation will be delivered in the Local Plan period.

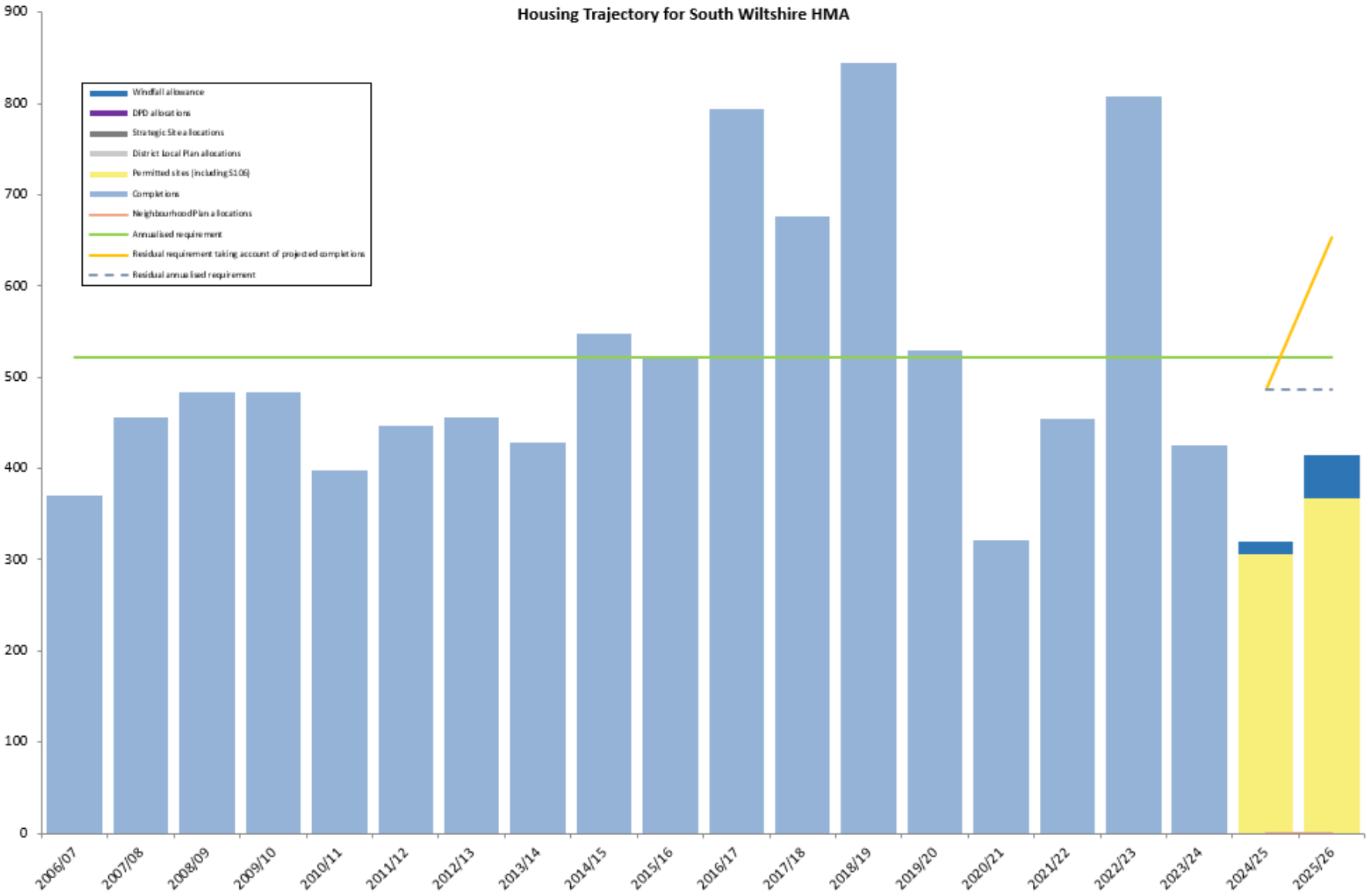
Site Address	Site reference	Planning status (at 31 March 2024)	Settlement / CA Remainder	5-year deliverability summary
South of Rowbarrow	20/00337/FUL	S106	Salisbury	The Section 106 agreement was signed on 17/10/2024, and a Commencement Notice was issued on 29/10/2024, with a start date of 18/11/2024. The developer, Bellway, forecasted first completions for 2025/26 in a survey submitted to the council in October 2024. As a result, the housing trajectory has been updated to reflect this recent information.
Station Works	NP/S11	Neighbourhood Plan	Tisbury	Appeal (APP/Y3940/W/22/3308919) dismissed for 86 dwellings and a care home of up to 40 bedspaces on 21/06/2023. Recent activity suggests there is potential and interest for the site to be delivered in the latter years of the Local Plan Period through a new scheme.
Stratford Court, Stratford Road, Salisbury, SP1 3JH	PL/2022/05365	Full permission	Salisbury	Development comprises 30 additional bed spaces in C2 use. Figures shown in the trajectories are based on a bed spaces-to-dwellings ratio in accordance with the PPG. Google Earth Street View imagery from November 2024 indicates that the new care home is nearing completion.
Tisbury Sports Centre, Weaveland Road, Tisbury, Salisbury, SP3 6HJ	PL/2022/00855	Full permission	Tisbury	Planning permission for 13 dwellings was granted on 04/12/2023. A discharge of conditions application (PL/2024/07292) is currently under consultation. Initial completions are considered achievable by 2026/27.
UKLF	WCS/S7	Strategic site	Wilton	See S11.0517.

Appendix 4: Trajectory graphs for Wiltshire LPA and Wiltshire Core Strategy Housing Market Areas


Housing Trajectory for Wiltshire LPA
3500
3000
2500
2000
1500
1000
500
0
Windfall allowance
DPD allocations
Neighbourhood Plan allocations
Strategic Site allocations
District Local Plan allocations
Permitted sites (including S106)
Completions
Annualised requirement
Residual requirement taking account of projected completions
Residual annualised requirement
2006/07
2007/08
2008/09
2009/10
2010/11
2011/12
2012/13
2013/14
2014/15
2015/16
2016/17
2017/18
2018/19
2019/20
2020/21
2021/22
2022/23
2023/24
2024/25
2025/26


Housing Trajectory for East Wiltshire HMA
Windfall allowance
DPD allocations
Neighbourhood Plan allocations
Strategic Site allocations
District Local Plan allocations
Permitted sites (including S106)
Completions
Annualised requirement
Residual requirement taking account of projected completions
Residual annualised requirement
700
600
500
400
300
200
100
0
2006/07
2007/08
2008/09
2009/10
2010/11
2011/12
2012/13
2013/14
2014/15
2015/16
2016/17
2017/18
2018/19
2019/20
2020/21
2021/22
2022/23
2023/24
2024/25
2025/26


Housing Trajectory for North and West Wiltshire HMA
2500
2000
1500
1000
500
0
Windfall allowance
DPD allocations
Neighbourhood Plan allocations
Strategic Site allocations
District Local Plan allocations
Permitted sites (including S106)
Completions
Annualised requirement
Residual requirement taking account of projected completions
Residual annualised requirement
2006/07
2007/08
2008/09
2009/10
2010/11
2011/12
2012/13
2013/14
2014/15
2015/16
2016/17
2017/18
2018/19
2019/20
2020/21
2021/22
2022/23
2023/24
2024/25
2025/26


Housing Trajectory for South Wiltshire HMA
Windfall allowance
DPD allocations
Strategic Site allocations
District Local Plan allocations
Permitted sites (including S106)
Completions
Neighbourhood Plan allocations
Annualised requirement
Residual requirement taking account of projected completions
Residual annualised requirement
900
800
700
600
500
400
300
200
100
0
2006/07
2007/08
2008/09
2009/10
2010/11
2011/12
2012/13
2013/14
2014/15
2015/16
2016/17
2017/18
2018/19
2019/20
2020/21
2021/22
2022/23
2023/24
2024/25
2025/26

Appendix 5 - Windfall allowance for land supply calculations

A1. The NPPF (paragraph 75) identifies that an allowance for windfall may be made where appropriate. It states:

"*Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.*"

A2. In Annex 2, the NPPF defines windfall sites as:

"*Sites not specifically identified in the development plan."*

A3. For the purposes of this assessment, windfall is defined as unallocated development. The 2019 NPPF (and subsequent versions of the NPPF) no longer define windfall sites as "normally" previously-developed land, and this indicates that an allowance for greenfield sites can be made subject to the criteria set out in paragraph 75 of the NPPF.

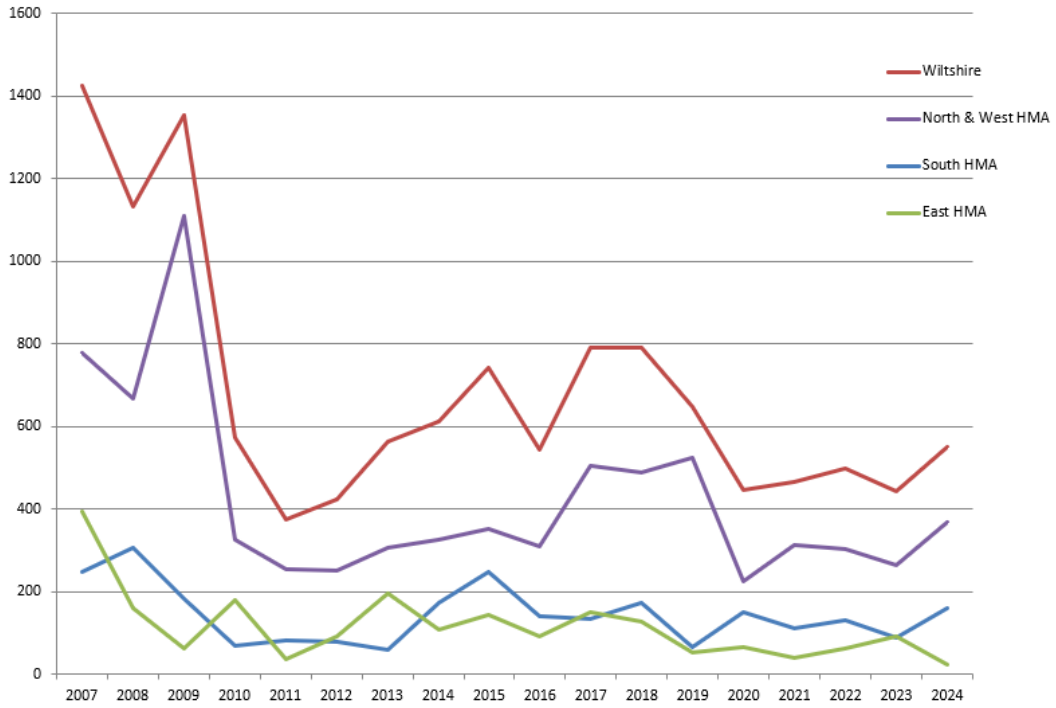
A4. This Appendix determines an appropriate windfall allowance for each of the Housing Market Areas within Wiltshire. It firstly analyses the trend of windfall permissions over the recent past in order to determine whether there has been consistent delivery from this source of supply. It also has regard to the Strategic Housing and Economic Land Availability Assessment (SHELAA) and potential supply from windfall sites in future years.

A5. In order to accord with the NPPF requirements for windfall allowance, the Council analyse prospects for windfall delivery each year as part of the annual review of its housing land supply.

Historic windfall delivery – brownfield sites

A6. The number of new brownfield windfall permissions granted during the Wiltshire Core Strategy period to date (2006 to 2024) is presented in Chart 1.

Chart 1: Brownfield windfall permissions



A7. The early years of the plan period saw a peak of permissions and corresponding delivery. There was a notable drop-off in permissions during the economic downturn following the financial crash in 2008 and given the limited availability of finance for development schemes and house purchases during this period, this is to be expected. However, periods of recovery since 2010 have shown peaks where developers are seeking consent on development opportunities. In recent years (since 2020) consents have been more limited, but this is likely to have been affected by the COVID-19 pandemic, and even during that period permissions have stayed relatively stable.

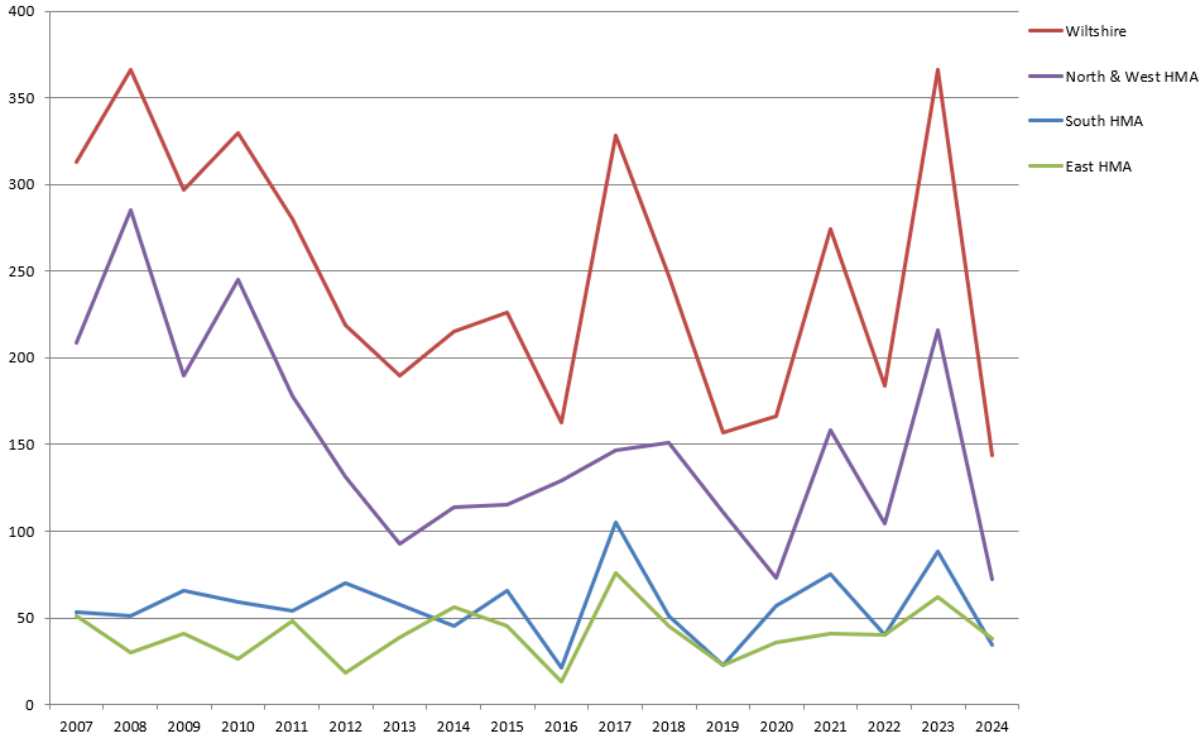
A8. In addition, during this period the Government have relaxed permitted development rights for changes of use to residential uses through the prior approval process. These have a lower requirement to show suitability than for equivalent detailed planning permission and removing the requirement for contributions, thus reducing the cost burden for developers. This has had a positive impact on applications for residential development, particularly on small sites.

A9. Taking these factors into account, it is appropriate to base a future windfall allowance on trends over a longer period of time to reflect such variations in economic conditions.

A10. Brownfield windfall development has historically contributed to supply in Wiltshire, accounting for some 27% of housing delivery during the Wiltshire Core Strategy period to date from 2006 to 2024. During this period, there has been a contribution from a range of sites of varying sizes. To better understand the propensity for different sized sites to contribute to delivery, the council have analysed delivery separately for small sites (<10 dwellings) and large sites (10 or more dwellings).

A11. The rate at which brownfield windfall development on small sites has come forward is presented in Chart 2.

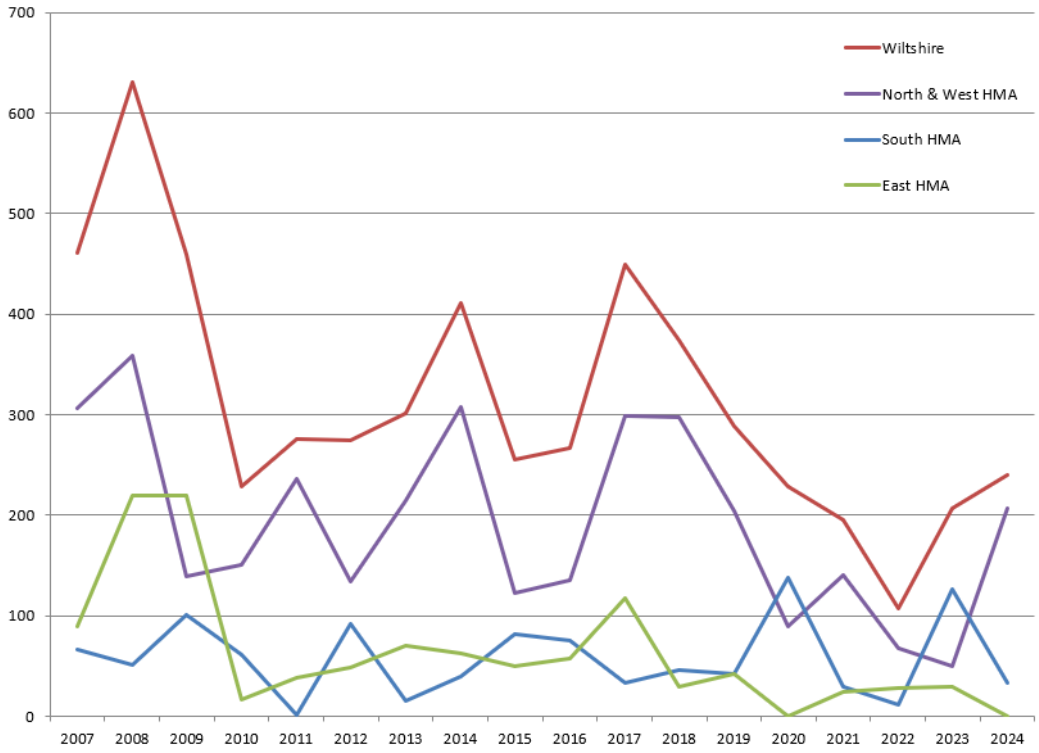
Chart 2: Brownfield windfall completions - small sites



A12. As with the volume of permissions, brownfield completions on small sites are lower than in the very early years of the plan period. Since the early stages of the economic recovery in 2012 completions on small sites have remained relatively stable (allowing for inevitable peaks and troughs over this period.) Increased availability of credit following the 2008 economic crash is likely to have made potential schemes more viable, and thus more likely to be implemented. The relatively consistent delivery from small sites reflects the number of opportunities and propensity for sites to become available. To reflect this, the allowance for small sites is based on the volume of such permissions since April 2009.

A13. The rate at which brownfield windfall development on large sites has come forward is presented in Chart 3.

Chart 3: Brownfield windfall completions - large sites



A14. Delivery from large sites on brownfield land may be more limited, due to fewer sites being delivered at any one time. However, the quantum of development will deliver more significant levels of housing when brought forward. The pattern of delivery from large sites has broadly followed that from small sites as shown in Chart 2 for the majority of the plan period.

A15. However, in recent years, rather than following a steady trajectory across the longer time period, delivery has shown a noticeable decrease. This may be due to existing sites being used up, but without a stock of opportunities being refreshed by the recycling of sites where the existing use has ceased.

A16. Although this may not be a long-term trend, the council have responded by amending its windfall allowance to reflect this trend on large sites. As such, the allowance for large sites is now based on the volume of permissions since April 2019 as this broadly reflects the time during which more limited delivery has occurred.

Historic windfall delivery – greenfield sites

A17. The council have not previously assessed the potential capacity from a windfall allowance on small greenfield sites due to national policy. Under the original Planning Policy Statement 3: Housing (DCLG, 2006) windfall development had been restricted to previously-developed land only. In response to concerns regarding over-development of neighbourhoods and targets to deliver a proportion of housing requirement on brownfield land, the Government issued a written statement in June 2010, to remove residential gardens from the definition of previously-developed land. Planning Policy Statement 3 was subsequently re-issued, with the definition of previously-developed land revised to excluding residential gardens.

A18. Under the 2012 NPPF the Annex 2 definition of windfall indicated that such sites "normally comprised previously developed land", thus providing some flexibility in the types of land that could be assessed as windfall. However, the windfall policy requirement (then paragraph 48) continued the approach set out in the (now superseded) PPS3 that such an allowance should not include development on residential gardens.

A19. Although it was recognised that not all small greenfield sites were residential gardens, analysis indicated that this formed a significant proportion of such sites. As detailed above, national policy that was in effect at this time limited the potential to identify windfall from greenfield sources and, as such, the council restricted its windfall allowance to brownfield land only.

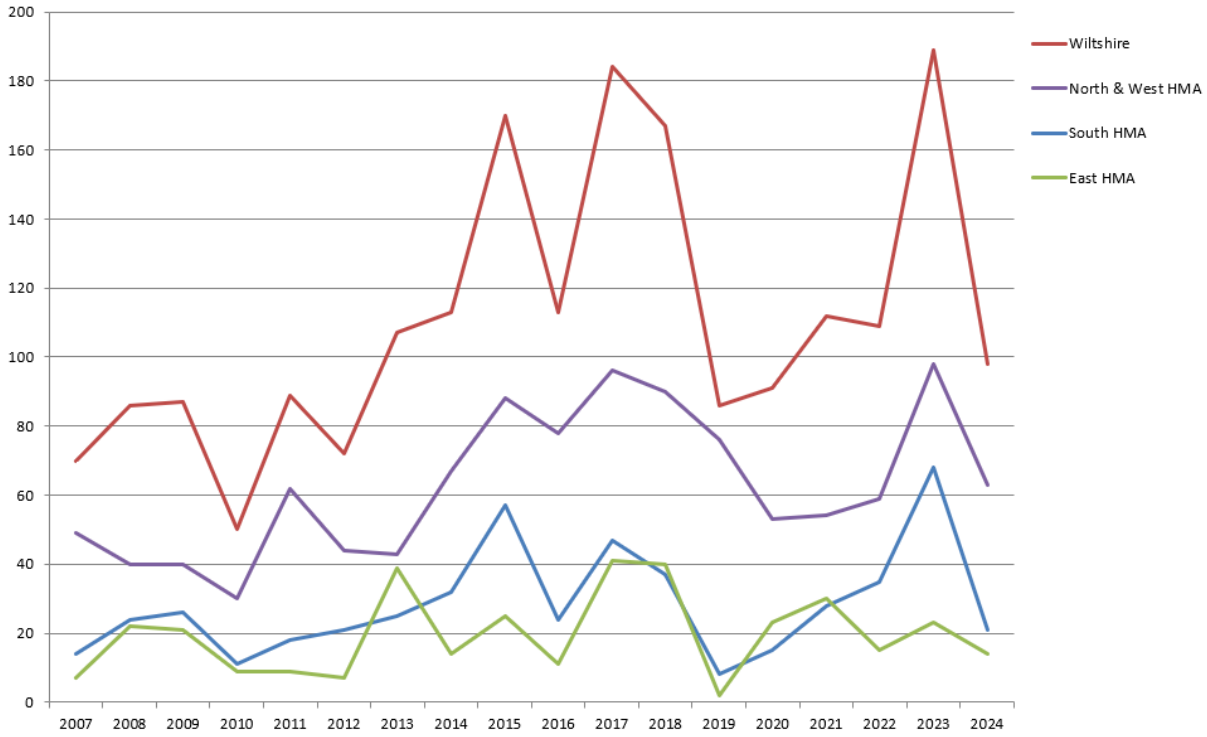
A20. The publication of the 2018 NPPF both amended the Annex 2 definition to remove the text referring to previously developed land, and amended the policy requirement (then paragraph 70) from a blanket exclusion on residential gardens to setting out policies in plan-making to restrict this where appropriate. These changes to national policy provided greater potential to consider delivery from un-allocated greenfield sites.

A21. The council recognise that policies in the development plan make provision for opportunities on small sites, both on previously-developed and greenfield land. There is a presumption in favour of development within existing settlement boundaries, which could include greenfield opportunities. At Small Villages, the delivery strategy makes provision for in-fill development which can include areas of undeveloped or vacant land within the built form. Core Policy 44 also makes provision for small rural exception housing sites where there is an identified local need. In addition, changes to legislation such as permitted development changes have encouraged the re-use of agricultural buildings to residential dwellings.

A22. As such the council have assessed delivery from small greenfield sites across the Wiltshire Core Strategy plan period to establish whether there is a case for including delivery from this source in the windfall allowance.

The rate at which greenfield development on small sites has come forward is presented in Chart 4.

Chart 4: Greenfield completions - small sites



A23. Unlike delivery from brownfield sites, delivery from small greenfield sites has broadly shown a gradual increase across the plan period, even accounting for peaks in delivery. Although delivery from this source is more limited than from brownfield sites, this demonstrates that this represents a continuous source of supply.

A24. The council recognises that until 2018, national policy restricted the use of greenfield delivery in its windfall allowance. However, given the changes to the NPPF at that date (which prevail in the current version) and that analysis shown in Chart 4 indicate this is a reliable source of supply, the council has included an allowance for small sites on greenfield land, based on permissions granted since April 2009. This is consistent with the approach taken for small brownfield sites.

Strategic Housing and Economic Land Availability Assessment (SHELAA)

A25. As noted in paragraph A1 above, the NPPF requires that, among other matters to be taken into consideration, a windfall allowance should be realistic having regard to the Strategic Housing Land Availability Assessment (now referred to as Strategic Housing and Economic Land Availability Assessment, or SHELAA).

A26. Up to the 2014 Housing Land Supply Statement, the Council based the windfall allowance for large sites using by assessing sites in the SHELAA which met the NPPF definition of windfall and were 'assumed deliverable' based on the following criteria:

- previously developed land within settlement boundaries (and therefore suitable in principle),
- confirmed to be in single ownership (and therefore with no availability constraint),
- viable, based on the model used in the SHELAA methodology (and therefore achievable).

A27. Following the publication of the 2012 SHLAA the Council carried out a proactive 'Call for Sites' as part of the emerging Wiltshire Housing Site Allocations Plan in 2014. As a result, there were a large number of new sites submitted that were considered in the Plan and were included in the most recent SHELAA (August 2017). More recently, the Council have carried out a Regulation 18 consultation for its emerging Local Plan in January 2021: this also generated a significant number of responses including sites where there are aspirations for development. The majority of these are on greenfield land outside settlement boundaries.

A28. However as acknowledged in previous Housing Land Supply Statements the Council does not rely on specific SHELAA sites within the 5-year supply, as sites that have not been submitted to the SHELAA come forward more regularly. To demonstrate this, the Council has carried out analysis of the contribution of SHELAA sites to brownfield windfall delivery during the Wiltshire Core Strategy period to date, compared to overall windfall delivery.

During the Wiltshire Core Strategy period (up to 31 March 2024), **1,348** windfall units have been delivered on sites which were originally identified in the SHELAA[4] compared with **10,145** brownfield windfall completions overall. Delivery of such sites thus represents just **13%** of total windfall in Wiltshire. This demonstrates that SHELAA sites have historically made a low contribution to windfall development.

Given the relatively low proportion of SHELAA sites submitted on brownfield land, this contribution is unlikely to change over time, whilst the overall numbers of windfall completions looks likely to maintain current delivery levels, supplied by the consistent numbers of windfall permissions being granted as shown in recent years.

In summary, although it is recognised that sites in the SHELAA do come forward, it can be shown that they form a low proportion of overall windfall delivery.

[4] Including sites identified prior to the concept of a SHELAA within a predecessor Urban Capacity Study or the National Land Use Database.

Permitted development legislation changes

A29. A number of changes to the General Permitted Development Order have been introduced since May 2013 which have reduced the need to seek planning applications for certain changes of use. These concern the change of use from a number of use classes to residential under a prior approval process.

A30. The consolidated General Permitted Development Order 2015 (and subsequent amendments) detailed this, and includes the change of use from offices, light industrial, storage and distribution units, shops, professional services, pay-day loan and betting shops, agricultural uses, casinos, and amusement arcades.

A31. With regards to greenfield delivery, the Government's expansion of permitted development rights has included Class MB (now Class Q following changes to the Use Class Order) which allows conversion of agricultural buildings to residential uses subject to criteria on floorspace and a maximum number of dwellings permitted under the extended rights. This has been subsequently further expanded in May 2024 to increase the amount of floorspace and number of dwellings permissible under such changes of use. In a rural authority such as Wiltshire there are plentiful supply of such opportunities, and these have developed in popularity since their introduction.

A32. More recently in 2020 and 2021, further changes have continued to allow provision for residential dwellings on previously developed land. These have allowed:

- upwards extensions of existing residential and commercial buildings (Class AA, AB, AC and AD),

- demolition and redevelopment of redundant buildings formerly in commercial or mixed use to residential use (Class ZA), and

- change of use of commercial and business uses to residential uses (Class MA). This right was extended further in March 2024 to increase the amount of floorspace permissible under such a change of use and no longer requires the building to have been vacant for 3 months prior to the change.

Since the first change-of-use prior-approvals amendments came into effect (May 2013) until the end of the current monitoring period (March 2024) prior approval has been granted (or not required) for a total of **590** residential units on brownfield land in Wiltshire.

In addition, over the same time period, prior approval has been granted (or not required) for a total of **233** dwellings for agricultural-to-residential changes of use in Wiltshire.

Policy and legislative incentives

A33. In addition to the continuous trend in windfall permissions and delivery from small sites and the effect of relaxing permitted development rights, the Government proposed initiatives to increase housing supply, implemented through the Housing and Planning Act 2016. As part of the legislation Local Planning Authorities now have to maintain statutory registers of previously-developed land in the Brownfield Land Register and can grant 'permission-in-principle' for sites on the Register.

The concept of 'permission-in-principle' has subsequently been extended to allow applicants to apply for permission-in-principle for Small sites, with details of the proposal submitted later through Technical Details Consent. Plan-making authorities can also grant permission-in-principle on site allocations in the development plan.

A34. The 2019 NPPF (and retained in subsequent versions of the NPPF) includes a chapter entitled 'Making effective use of land' which promotes policies to meet the need for homes and other uses. It requires policies and decisions to give substantial weight to the value of suitable brownfield land within settlements. As the emerging Wiltshire Local Plan progresses, future development strategies would need to demonstrate how they have regard to this national policy. This has the potential to unlock brownfield sites and increase the supply of windfall development within Wiltshire in the future.

A35. To encourage opportunities for first-time buyers the 2018 NPPF also introduced the concept of entry-level exception sites. These set out criteria for development of such uses on non-allocated and smaller sites[5] thus potentially unlocking sites that may not previously have garnered policy support.

A36. The introduction of legislation and policy specifically for self-build and custom-build housing also has the potential to increase windfall as a source of supply. This form of development includes an exemption from Community Infrastructure Levy (CIL) payments and Biodiversity Net Gain (BNG) requirements, thus reducing the cost burden and making such developments more attractive for would-be developers.

A37. As part of its programme of planning reform to speed up build rates and timescales of development, in May 2025 MHCLG announced proposals to improve the planning and development environment for Small and Medium sized enterprise (SME) developers. Such enterprises are those most likely to build small sites, which form a significant proportion of windfall permissions and delivery in Wiltshire. The changes includes reforming site size thresholds to introduce a 'medium' site between

[5] Footnote 36 of the NPPF (December 2024) indicates such exception sites should not be larger than one hectare in size or exceed 5% of the size of the existing settlement.

major and non-major development, and reducing policy requirements for such sites.

The proposal also seeks to reduce development costs on non-major sites including less regulatory requirements on BNG which will improve viability, and exempting sites from proposed build-out transparency proposals (also introduced through the May 2025 announcements). The Government are also introducing a new Housing Delivery Fund for SMEs to support long-term finance options for development projects to support delivery. The existing Home Building Fund offered by Homes England has also been extended to provide access to finance for SMEs who had been unable to obtain funding from traditional lenders.

A38. Although the proposals are currently in consultation, it does indicate the recognition that SMEs make in delivering smaller sites and the Government's drive to improve prospects of future development of small and medium sized windfall sites.

A39. At a local level, the Council has commissioned studies to identify existing provision and potential need for non-residential land uses, to inform the emerging Local Plan review. The Wiltshire Retail and Town Centres Study 2020 (Avison Young, November 2020) identifies approaches to diversify uses within town centres in certain locations. In response, the town centre policy (Policy 68) in the emerging Local Plan provides a criteria-based approach for circumstances in which provision of residential development may be acceptable.

Expected future supply

A40. Chart 1 above shows brownfield windfall permissions in the 18 years of the Wiltshire Core Strategy. Permissions decreased from the start of the plan period in 2006 following the financial crisis and subsequent economic recession from 2009 to 2012.

A41. Chart 2 shows brownfield windfall completions from small sites in the 18 years of the Wiltshire Core Strategy. It also reflects the economic conditions over that period, with relative consistent delivery since recovery from the 2008 economic crash began. These trends indicate that development opportunities are consistently being implemented and, in terms of future delivery, that supply is continually being replenished with new sites. This arises where the current land use has changed and/or policy and legislative changes are simplifying the planning process, and/or making such opportunities attractive for development.

A42. The change in the approach for brownfield windfall from large sites (Chart 3) reflects the downward trend from this source, however this is not to indicate this will continue indefinitely. This, as well as all sources of windfall, will be monitored as part of the annual review of the housing land supply.

A43. Chart 4 shows greenfield windfall completions from small sites in the 18 years of the Wiltshire Core Strategy. This indicates that development opportunities are consistently being implemented over a longer period of time. Opportunities have continually arisen, both through in-filling of greenfield sites in built-up areas, and opportunities offered through rural sites given the nature of Wiltshire.

Method for identifying an allowance for future windfall delivery

A44. Up to the 2014 Housing Land Supply Statement the Council calculated a windfall allowance based on two separate components:

- For **small** sites (5 or fewer dwellings): historic permissions of such sites from 2009 to 2012 with a delivery rate applied,

- For **large** sites (more than 5 dwellings): capacity of previously developed sites within settlement boundaries (therefore assumed to be suitable) and in single ownership (therefore assumed to be available) within the 2012 SHELAA.

A45. Paragraph 32 of the NPPF requires Local Planning Authorities to ensure their local plan is based on relevant and up-to-date evidence. This should include the update of the authority's Housing Land Supply position, and therefore the windfall allowance that forms a source of housing supply. This previous windfall allowance used permissions from April 2009 to March 2012 which is now dated, and relied on delivery rates from permissions prior to 2008 which no longer reflect the prevailing economic climate. In addition, as discussed in A26-A28 above, using the capacity of 'assumed deliverable' SHELAA sites to establish a large site allowance significantly under-estimates the potential future supply when compared against actual historic permissions, and has also found to be difficult to understand.

A46. Following the publication of the July 2014 Housing Land Supply Statement the Wiltshire Core Strategy Inspector produced his Final Report confirming that the development plan passed the tests of soundness set out in the NPPF. The housing land supply was discussed in paragraphs 88-97 of the Final Report and included a discussion on the use of a windfall allowance at paragraph 97. It states:

"*...the Council promulgates three methods of calculating windfall allowances all of which have some credibility and which produce a county wide five year range of housing delivery between 940 and 2713 homes. The Council has elected to take a conservative estimate of likely windfalls yet the evidence is sufficiently compelling to suggest that the likely rate of housing delivery on such sites, both large and small, will be greater.*"[6]

The Wiltshire Core Strategy was subsequently adopted by the Council in January 2015.

A47. Given the national and local policy context the Council has adopted its current windfall allowance to reflect the Inspector's conclusions. The method is a model based on historic delivery as used in Method 3 set out in the July 2014 Housing Land Supply Statement and referenced in the Wiltshire Core Strategy Inspector's Final Report. This was referred to as Method A from the 2015 Housing Land Supply Statement onwards up to the present Statement.

A48. Method A uses the number of permissions across a period achieved to date to produce an annualised average to which a delivery rate is then applied. The delivery rate reflects more recent economic conditions - specifically build out of permissions granted from 2008 to 2014 - rather than an earlier period (from 2001 to 2008) used in the windfall allowance calculation until 2017.

As discussed in the section on 'Historic windfall delivery', for small sites it is considered that permission figures derived from the 2009 – 2024 period represent an accurate estimate of future delivery, as it covers the low number of permissions granted during the recessionary period following the economic crisis, a relatively steady position up to the present day, with some reduction across the years affected by the COVID pandemic (as shown in Chart 1 above). For large brownfield sites, it is appropriate to base the calculation on permissions in more recent years 2019 – 2024 to reflect the recent downward trend in delivery from this source.

A49. To demonstrate the realistic nature of this method, a number of alternative methods and the allowance generated by each are set out in Table A6.

[6] It is acknowledged that Methods 1 and 2 referenced in the July 2014 Statement use the capacity of Large sites in the SHLAA to calculate the large part of the allowance (as discussed in A14 above). Method 3 (which produced the largest allowance quoted in the Wiltshire Core Strategy Inspector's Final Report paragraph 97 above) is based exclusively on permissions during the period 2006-2012.

Windfall allowance calculation

A50. As identified above, the number of windfall sites achieving permission since 2009 has varied with differing longer term trends depending on the size and land type nature (brownfield or greenfield) of the site.

A51. Although future economic conditions are, by their nature, uncertain it is considered that basing the allowance on a longer period results in a more representative picture of the economic cycle and potential future development activity.

A52. For **small brownfield** and **small greenfield sites** the average number of permissions across the period 2009-2024 will be assumed to be permitted each year for the following five years.

A53. For **large brownfield sites** the average number of permissions across the period 2019-2024 will be assumed to be permitted each year for the following five years.

A54. The average number of new windfall permissions across this period for each category of windfall is presented in Table A2.

Table A2: windfall permissions and assumed delivery over five years

Area	Average number of brownfield windfall permissions on small sites (per annum)	Average number of brownfield windfall permissions on large sites (per annum)	Average number of greenfield windfall permissions on small sites (per annum)
East Wiltshire HMA	54	6	20
North and West Wiltshire HMA	161	130	74
South Wiltshire HMA	70	38	28
Wiltshire	**285**	**174**	**122**

Delivery rate

A55. In order to estimate how many windfall sites will actually be delivered within five years, a delivery rate is applied to allow for non-implementation of permissions. The delivery rate has been calculated

using the completion date of windfall permissions granted from 2009 to 2015[7] over an eight-year period. This is appropriate for two reasons:

Firstly, it reflects the low number of permissions in the early part of that period with a gradual increase to 2015, and thus reflects delivery throughout that economic period as permissions were implemented.

Secondly, if brownfield windfall permissions are implemented, historic delivery records indicate any permission that is implemented will be completed within eight years after permission. Using the period 2009 – 2015 for assessing implementation of permissions provides a comprehensive dataset of delivery rates. This is because virtually all implemented permissions that were granted in 2009 will be complete by 2017. Similarly at the later end of the range, virtually all implemented permissions granted in 2015 will be complete by 2023 which is the present position.

The resulting rate is presented in Table A3.

Table A3: Standard delivery rate

Type	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8
Small greenfield	13.7%	29.5%	14.3%	7.6%	3.0%	1.4%	0.04%	0.03%
Small brownfield	14.0%	26.3%	14.9%	8.7%	3.3%	0.1%	0.03%	0.02%
Large brownfield	0.02%	14.9%	23.2%	14.2%	5.6%	6.4%	0.01%	0.00%

A56. Table A3 shows that for a small brownfield permission granted in year 1, only 67.2% will reach completion in the five-year period. Indeed, only 68.6% will reach completion at all, providing an allowance for non-delivery. For a large brownfield permission granted in year 1, only 59.7% will reach completion in the five-year period and 66.9% overall. Finally, for a small greenfield permission granted in year 1, only 68% will reach completion in the five-year period and 70.7% overall. This provides a comprehensive assessment of the rate at which permissions are either implemented or lapsed.

A57. This delivery rate has been applied to the assumed number of new windfall sites for small and large brownfield sites. Table A4 shows an example which is for small brownfield sites in the East Wiltshire HMA.

[7] This uses the same number of dwellings permitted as in earlier Housing Land Supply Statements, however the data used to determine the delivery rate has been refreshed to include completions up to 2015. This will result in a revised rate for each year, and thus for the overall 5-year period.

Table A4: Delivery matrix showing small brownfield sites in the East Wiltshire HMA

	Built in year 1	Built in year 2	Built in year 3	Built in year 4	Built in year 5
54 permitted in year 1	54 x 14.0% = **7.6**	54 x 26.3% = **14.2**	54 x 14.9% = **8.0**	54 x 8.7% = **4.7**	54 x 3.3% = **1.8**
54 permitted in year 2		54 x 14.0% = **7.6**	54 x 26.3% = **14.2**	54 x 14.9% = **8.0**	54 x 8.7% = **4.7**
54 permitted in year 3			54 x 14.0% = **7.6**	54 x 26.3% = **14.2**	54 x 14.9% = **8.0**
54 permitted in year 4				54 x 14.0% = **7.6**	54 x 26.3% = **14.2**
54 permitted in year 5					54 x 14.0% = **7.6**
Sum	**7.6**	**21.8**	**29.8**	**34.5**	**36.3**

A58. This demonstrates the effect of assessing delivery from a 'cold start' (in order not to double-count completions on permissions that have already been granted at the base date) and providing a realistic delivery rate.

A59. In the example given, of the **290** dwellings that are forecast to be permitted within 5 years on small brownfield sites in the East Wiltshire HMA, only **130** are assumed to be deliverable in the forthcoming 5 years.[8]

A60. Using the above calculation, the resulting allowance for each category of windfall in each HMA and Wiltshire overall is presented in Table A5[9].

[8] Figures from table A4 may not sum exactly due to rounding.

[9] Figures from table A5 may not sum exactly due to rounding.

Table A5: Summary of windfall allowance for each HMA, development size and land type for 2024-2029.

Area	From brownfield windfall permissions on small sites	From brownfield windfall permissions on large sites	From greenfield windfall permissions on small sites	TOTAL
East Wiltshire HMA	130	10	50	**190**
North and West Wiltshire HMA	389	225	183	**797**
South Wiltshire HMA	168	66	69	**303**
Wiltshire	**687**	**301**	**302**	**1,290**

A61. This allowance, as described throughout this section, is set out to be a realistic estimate based on prevailing and anticipated economic conditions. To demonstrate this Table A6 shows the proposed method described above (Method A) and two alternative calculations (Methods B and C) using permissions granted during other time periods, thus reflecting a different mix of economic conditions. Each method is described briefly in footnotes 10 and 11.

Table A6: Comparison of methods for calculating windfall allowance

Area	Method A (as above)	Method B[10]	Method C[11]
East Wiltshire HMA	**190**	244	223
North and West Wiltshire HMA	**797**	916	607
South Wiltshire HMA	**303**	315	161
Wiltshire	**1,290**	1,475	991

[10] **Method B:** as Method A but for brownfield sites only. It assumes that the average number of new windfall permissions over the entirety of the Wiltshire Core Strategy period to date (2006-2024) will be permitted for the next five years and will be delivered at the standard development rate. This could be perceived to be a more robust assessment of future windfall delivery as it covers a longer period of time and thus takes into account both peaks and troughs of the economic cycle. However, given the nature of the economic recession from 2008, permissions achieved in the early years of this period are considered to have been driven by an unsustainable financial model, and therefore are unlikely to be a realistic representation of future activity.

[11] **Method C**: as Method A but for brownfield sites only. It assumes that the average number of new windfall permissions during the period 2009-2012 will be permitted for the next five years and will be delivered at the standard development rate. This period of time was used for the small brownfield site windfall allowance in Housing Land Supply Statements prior to 2015. As can be seen from Chart 2 and Chart 3 in this section it represents the lowest points in the economic cycle. Since this date there have been periods of improved economic activity, with greater opportunities for delivery and for reasons explained earlier this is likely to continue. As such this method is not considered to be a realistic projection for future years.

Appendix 6 – Summary assessment of supply and remaining housing to be identified (by Community Area settlements and rural remainders)

Area	Indicative requirement 2006-2026	Completions 2006-2024	Deliverable commitments 2024-2026[12]	Indicative remaining requirement [13]
Devizes	2,010	2,066	87	-143
Devizes CA remainder	490	442	105	-56
Devizes CA	2,500	2,508	192	-200
Marlborough	680	726	17	-63
Marlborough CA remainder	240	237	12	-9
Marlborough CA	920	963	29	-72
Pewsey CA	600	611	7	-18
Tidworth and Ludgershall	1,750	1,370	164	216
Tidworth CA remainder	170	117	7	46
Tidworth CA	1,920	1,487	172	261
EAST WILTSHIRE HMA	**5,940**	**5,569**	**399**	**-28**
Bradford on Avon	595	630	8	-43
Bradford on Avon CA remainder[14]	185	201	22	-38
Bradford on Avon CA[14]	780	831	30	-81
Calne	1,440	2,134	87	-781
Calne CA remainder	165	196	6	-37
Calne CA	1,605	2,330	93	-818
Chippenham	4,510	2,918	453	1,139
Chippenham CA remainder	580	571	67	-59
Chippenham CA	5,090	3,489	521	1,080
Corsham[15]	1,220	984	65	171
Corsham CA remainder[15]	175	459	13	-297
Corsham CA	1,395	1,443	78	-126

[12] Figures in the Deliverable commitments column represent committed sites only and **do not** include a windfall allowance. The summary for each area shows the total number of units assumed to be developable based on historic delivery rates (rounded to the nearest whole unit) and information from developers, site representatives and officers for Large sites.

[13] Figures in the Indicative remaining requirement column show as a positive figure where the indicative requirement (completions and commitments) has not yet been met. It shows as zero or a negative figure where the indicative requirement has been met or exceeded.

[14] Bradford on Avon CA remainder and Bradford on Avon CA exclude any development at Staverton Marina which is classified as Trowbridge Principal Settlement.

[15] Corsham CA remainder and Corsham CA exclude any development at South West Chippenham which is classified as Chippenham Principal Settlement.

Area	Indicative requirement 2006-2026	Completions 2006-2024	Deliverable commitments 2024-2026[12]	Indicative remaining requirement [13]
Malmesbury	885	1,043	180	-338
Malmesbury CA remainder	510	617	118	-225
Malmesbury CA	1,395	1,660	297	-562
Melksham and Bowerhill	2,240	2,590	103	-453
Melksham CA remainder[16]	130	186	22	-78
Melksham CA[16]	2,370	2,776	125	-531
Royal Wootton Bassett	1,070	1,170	16	-116
Royal Wootton Bassett and Cricklade CA remainder[17]	385	745	104	-464
Royal Wootton Bassett and Cricklade CA[17]	1,455	1,915	120	-580
Trowbridge	6,810	3,629	352	2,829
Trowbridge CA remainder	165	346	24	-205
Trowbridge CA	6,975	3,975	376	2,624
Warminster	1,920	1,124	230	566
Warminster CA remainder	140	193	23	-76
Warminster CA	2,060	1,317	253	490
Westbury	1,500	1,848	100	-448
Westbury CA remainder	115	90	36	-11
Westbury CA	1,615	1,938	136	-459
NORTH AND WEST WILTSHIRE HMA	**24,740**	**21,674**	**2,030**	**1,036**
Amesbury, Bulford and Durrington	2,440	2,328	31	81
Amesbury CA remainder	345	317	16	12
Amesbury CA	2,785	2,645	47	93
Mere	235	265	52	-82
Mere CA remainder	50	73	5	-28
Mere CA	285	338	57	-110
Salisbury	6,060	4,681	517	346
Wilton		510	6	
Wilton CA remainder	255	182	1	72
Salisbury and Wilton CAs	6,315	5,373	524	418
Downton	190	183	1	6
Southern Wiltshire CA remainder[18]	425	616	37	-228

[16] Melksham CA remainder and Melksham CA exclude any development at Land North of Green Lane as this is classified as Trowbridge Principal Settlement.

[17] Royal Wootton Bassett & Cricklade CA remainder and Royal Wootton Bassett & Cricklade CA exclude any development at the West of Swindon.

[18] Southern Wiltshire CA remainder and Southern Wiltshire CA exclude development at Old Sarum and Longhedge. These are classified as Salisbury Principal Settlement.

Area	Indicative requirement 2006-2026	Completions 2006-2024	Deliverable commitments 2024-2026[12]	Indicative remaining requirement [13]
Southern Wiltshire CA[18]	615	799	38	-222
Tisbury	200	181	1	18
Tisbury CA remainder	220	94	6	120
Tisbury CA	420	275	7	138
SOUTH WILTSHIRE HMA	**10,420**	**9,430**	**673**	**316**
Swindon (within Wiltshire)	**900**	**932**	**0**	**-32**
WILTSHIRE	**42,000**	**37,605**	**3,103**	**1,292**

APPENDIX L - SNARLTON FARM SoS RECOVERY LETTER

The Planning Inspectorate

The Planning
Inspectorate
c/o QUADIENT
69 Buckingham
Avenue
Slough
SL1 4PN

Helen Skinner
Tel: No 0303 444 5532
helen.skinner@planninginspectorate.gov.uk

Wiltshire Council

Your Ref: PL/2024/07097

Our Ref: APP/Y3940/W/25/3373278

Date: 29th January 2026

Dear Sir,

Town and Country Planning Act 1990
Appeal by: Catesby Estates Promotions Limited
Site Address: Land South of Snarlton Farm, Snarlton Lane, Melksham

Although under the Town and Country Planning (Determination of Appeals by Appointed Persons) (Prescribed Classes) Regulations 1997, the appeal was to have been decided by an Inspector, the Secretary of State considers that he should determine it himself.

Accordingly, in exercise of his powers under section 79 and paragraph 3 of Schedule 6 of the Town and Country Planning Act 1990, the Secretary of State hereby directs that he shall determine this appeal instead of an Inspector. This means that instead of writing a decision, the Inspector will prepare a report and recommendation, which will be forwarded to the Secretary of State.

The reason for this direction is that the appeal involves proposals for residential development of over 150 units or on sites of over five hectares, which would significantly impact on the Government's objective to secure a better balance between housing demand and supply and create high quality, sustainable, mixed and inclusive communities.

This direction is being served on the Inspector the appellant (or their representative) and the local planning authority.

The guidelines for 'recovering' appeals are to be found in House of Commons Hansard Ministerial Statement of 30 June 2008 (as amended). We will send you a copy of the appropriate extracts if you ask for them or you can get them from GOV.UK

https://www.gov.uk/government/collections/planning-applications-called-in-decisions-and-recovered-appeals#recovered-planning-appeals

Yours faithfully

Helen Skinner

Operations Manager, Inquiries & Major Casework

This decision was made by officials on behalf of the Secretary of State, and signed on his behalf

APPENDIX M - SNARLTON FARM COMMITTEE REPORT PL/2024/07097

REPORT FOR STRATEGIC PLANNING COMMITTEE

Date of Meeting	5 August 2025
Application Number	PL/2024/07097
Site Address	Land South of Snarlton Farm, Snarlton Lane, Melksham, SN12 7QP
Proposal	Erection of up to 300 dwellings (Class C3); land for local community use or building (incorporating Classes E(b), E(g) and F2(b) and (c)); open space and dedicated play space and service infrastructure and associated works on land South of Snarlton Farm (Outline planning application with all matters reserved except for two pedestrian and vehicle accesses (excluding internal estates roads) from Eastern Way) - Resubmission of PL/2023/07107)
Applicant	Catesby Estates
Town/Parish Council	MELKSHAM WITHOUT
Electoral Division	BOWERHILL – Cllr Nick Holder
Type of application	OUTLINE PLANNING PERMISSION: SOME MATTERS RESERVED
Case Officer	Verity Giles-Franklin

Reason for the application being considered by Committee: In accordance with the Council's Scheme of Delegation, this application constitutes a development plan departure comprising a housing development on unallocated land outside the established settlement limits of Melksham, and in recognition of the Council's current demonstrable housing land supply position, the application merits being reported to the Strategic Planning Committee rather than the relevant area planning committee, since there are strategic planning matters requiring member determination.

The local ward member Cllr Holder requested that this application be referred to committee should officers be minded to recommend the application for approval due to the scale of the development, the visual impact of the development and the site being located outside the defined settlement boundary for Melksham.

1. RECOMMENDATION: For the reasons set out within this report, officers recommend that members of the Planning Committee endorse the officer recommendation to approve the abovementioned application, subject to a Section 106 (s106) legal agreement and planning conditions (as set out within sections 10 and 11 of this report).

2. Purpose of Report: The purpose of this report is to assess the merits of the proposal against the policies of the development plan and other material considerations and to consider the recommendation that the application should be approved subject to conditions and require the applicant to enter into a s106 legal agreement.

3. Report Summary: This report appraises the: principle of the development; loss of agricultural land; visual/landscape impacts; highway safety; flood risk and drainage; heritage impacts; neighbouring amenity and amenity of future occupiers; ecology; planning obligations.

Melksham Without Parish Council objects to the application, the details of which are provided within section 7 of this report. A total of 18 public representations have also been received, which are summarised within section 8 of this report.

4. Site Description: The application site extends to about 19.2 hectares and is relatively flat agricultural land in the open countryside to the east of Melksham. As partly shown below, there is residential development to the west of the application site (beyond Eastern Way). The land to the east is open countryside and more agricultural land. To the south of the site, there is the Melksham Football and Rugby Clubs with its associated clubhouse and pitches.



Extract of the submitted location plan (drawing no. 05d)

The proposed dwellings in the southernmost parcel would be positioned around the surface water drainage detention basin shown in the above plan extract which itself falls outside the applicant's red lined site area and does not form part of this application). This feature is associated with the residential development comprising 446 dwellings with associated infrastructure (that was approved under planning applications 14/10461/OUT and 18/04644/REM and has been subject to subsequent variations and discharge of conditions submissions.

A designated main river (the Clackers Brook) crosses the centre of the site (and is shown in green in the above extract and runs west to east) and as shown in the following extract, this river has a mapped floodplain to the north and south with the land being mapped as Flood Zones 2 and 3. With reference to

the Government's Flood Map for Planning, the developable area within the applicant's submitted site area is shown to be in Flood Zone 1 and at low risk of future groundwater flooding. Part of the application site is however at risk of surface water flooding, with the northeastern area of the site relating to a shallow depression within the site boundary, within an area that generally falls north to south towards the Clacker's Brook. Reference to the site-specific topographic survey illustrates that this slight depression would generate a *maximum* flood depth of approximately 200mm, and typically depths of between 0mm and 150mm and does not form part of a wider surface water flow path.

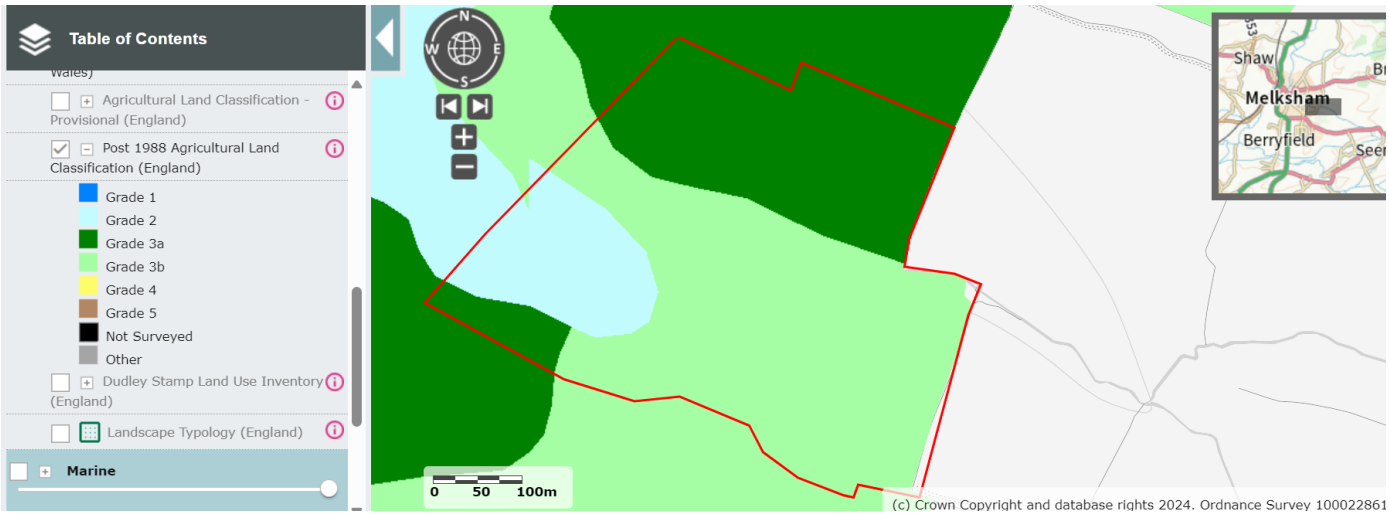


Flood Zones 2 and 3 as taken from [Flood map for planning - GOV.UK]



Extent of likely surface water flooding in a 1 in 100 event taken from [Flood map for planning - GOV.UK]

With reference to the government's online Magic Map[1] mapping tool, the site is located on land designated as Grade 3a (area shown in dark green) and Grade 3b (depicted by the light green colouring) with a small area of Grade 2 (shown in light blue) to the south-west (in the approximate location of the existing attenuation basin), as illustrated by the below extract:



Based on the Magic Mapping resource, it is acknowledged that the application site does include land which the NPPF defines as 'best and most versatile agricultural land' (BMV), including land in Grades 2 and 3a of the Agricultural Land Classification and this is discussed in section 9.2 of this report.

The application site is not subject to any protected landscape or ecological designations and there are no heritage assets within 50m of the site. There are two public rights of ways (PRoW) which cross the site (namely MELW22 located to the north of Clackers Brook and MELW23 to the south of the site) and the site is within the Avon Open Clay Vale Landscape Character Assessment area (reference 12B) and Avon Vale Countryside Character Area (reference 117).

4. Planning History: The following planning history is of relevance to this application:

PL/2023/03281 - EIA Screening Opinion in accordance with Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) – The Council concluded that the proposed residential development of this site in combination with other approved and consented schemes would require an EIA. Following the Council issuing their screening opinion in June 2023, the applicant sought a separate view from the Secretary of State in July 2023 who responded in December 2023 stating that the proposal did not represent EIA development.

PL/2023/07107 - Outline planning application with all matters reserved except for two pedestrian and vehicle accesses (excluding internal estates roads) from Eastern Way, for the erection of up to 300 dwellings (Class C3); land for local community use or building (incorporating Classes E(b), E(g) and F2(b) and (c)); open space and dedicated play space and service infrastructure and associated works – Withdrawn

[1] Magic Map Application (defra.gov.uk)

It is also important to mention that the site to the north of Snarlton Farm has been granted approval for the development of the Blackmore Farm site for 500 dwellings (application reference PL/2023/11188), as endorsed by Members of the Strategic Planning Committee on 23 January 2025.

5. The Proposal: This application seeks outline planning permission with all matters reserved except for two pedestrian and vehicle accesses from Eastern Way. An illustrative masterplan has been submitted for the application site which would have two land parcels separated by Clackers Brook with no vehicular access over Clackers Brook being advanced, but instead a pedestrian route is proposed to add site permeability as shown below.



It is important to appreciate that as this application is submitted in outline, the proposal does not seek to fix an internal road layout through the developable site area since this would, along with the full details for the erection of up to 300 dwellings (Class C3), the development of land for local community use or building (incorporating Classes E(b), E(g) and F2(b) and (c)), be matters for a follow up reserved matters application. In addition, the applicants are committed to providing public open space and a dedicated children's play

area within the site alongside associated infrastructure and works to the highway.

Due to the position of the Clackers Brook, the proposed development would be split across two land parcels either side of the brook and would come forward as two cul-de-sacs each to be served by their own access off Eastern Way, with no vehicular access being proposed over the Clackers Brook.

The proposed development would be served by its own surface water strategy and would be entirely separate to the existing attenuation basin that serves the housing development to the west of Eastern Way.

As this application is outline with all matters except access from Eastern Way reserved, any layout plans submitted as part of this application are indicative and for illustrative purposes only, and as shown above, the applicant has revised the application to advance the scheme with two roundabout connections to the west to serve the proposed dwellings, community land, internal roads, attenuation basins and public open space either side of the Clackers Brook.

6. Planning Policy

National Context: National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG)

Local Context: The adopted Wiltshire Core Strategy (WCS) 2015, namely core policies (CP): CP1 - Settlement Strategy; CP2 - Delivery Strategy; CP3 - Infrastructure Requirements; CP15 - Spatial Strategy for the Melksham Community Area; CP41 - Sustainable Construction and Low Carbon Energy; CP43 - Providing Affordable Housing; CP50 - Biodiversity and Geodiversity; CP51 - Landscape; CP52 - Green Infrastructure; CP57 - Ensuring High Quality Design and Place Shaping; CP58 - Ensuring the Conservation of the Historic Environment; CP60 - Sustainable Transport; CP61 - Transport and New Development; CP62 - Development Impacts on the Transport Network; CP64 - Demand Management; CP67 - Flood Risk

Saved policies of the West Wiltshire District Plan (1st Alteration) adopted June 2004: U1a Foul Water Disposal, I2 Arts and I3 Access for Everyone

Wiltshire Council Local Transport Plan 2011-2026 (LTP3) and Local Transport Plan 2025-2038 (LTP4)

Joint Melksham Neighbourhood Plan 2020-2026, 'made' July 2021 and Advancing Joint Melksham Neighbourhood Plan 2 2020-2038 (Referendum Version)

Wiltshire Council Housing Land Supply Statement (using base date April 2024) published in June 2025

Wiltshire Housing Site Allocations Plan, adopted 25 February 2020

Wiltshire Council's Waste Core Strategy, adopted July 2009

Wiltshire Council's Waste Storage and Collection: Guidance for Developers Supplementary Planning Document adopted January 2017

Leisure and Recreation Development Plan Document, adopted 21 January 2009, relevant policies including: LP4 - Providing Recreation Facilities in New Developments; LP5 - New Sport and Recreation Facilities; CR1 - Footpaths and Rights of Way; CR3 - Green Space Network; GM2 - Management and

Maintenance of New or Enhanced Open Space; GM3 - Future Management Partnerships; and YP1 - Children's Play Areas

7. Summary of Consultation Responses

Melksham Without Parish Council: Objects as follows:

- *Loss of Greenfield site.*

- *The development is in the open countryside, outside the Settlement Boundary of Melksham & Bowerhill, isolated and is therefore unsustainable.*

- *This site equates to piecemeal development and is not plan led. Wiltshire Council's current Core Strategy, and its draft Local Plan do not include this site as a strategic allocation. There is no allocation for Melksham in the adopted Wiltshire Housing Site Allocations Plan (adopted February 2020) either. Melksham's made Neighbourhood Plan (adopted July 2021), does not include this site as a housing allocation; nor does it include it in its reviewed Plan which has recently been subject to a second Regulation 14 consultation (Version B: June 2024). This version of the Neighbourhood Plan has housing allocations for at least 483 dwellings across 5 sites. The emerging Local Plan has allocations for 845 dwellings across 3 sites. This gives a total allocation of 1,328 set against a residual figure in the Melksham area of 1,120 and 68 for Shaw and Whitley (31 May 2023) as set out in the draft Local Plan. In addition, the current Core Strategy sets out policies until 2026, and the housing allocation for the Melksham area has been exceeded to date (refer to evidence documents for the draft Local Plan Reg 19: September 2023).*

Following changes to the National Planning Policy Framework (NPPF) announced at the end of 2023, current guidance means such development can be refused, as Wiltshire Council can prove they have a 3.85-year land supply and have met the condition to have undertaken a Regulation 19 Local Plan consultation within 2 years. In addition, the Melksham Neighbourhood Plan (adopted in July 2021) now has full Paragraph 14 protection until July 2026 and has recently been reviewed and a second Regulation 14 consultation completed in August 2024. In a letter to the parish council from Catesby Estates on the plans to be resubmitted, they explain that this change in policy context is why they withdrew their application, however, there has been no further change in planning policy since then.

- *As this site has not been allocated in the draft Local Plan and therefore this site does not form part of the strategic thinking with regard to housing and infrastructure requirements in Melksham. The site is not part of a wider strategic site bringing with it infrastructure, such as schools, medical facilities, community centre, highway improvements and a local centre etc.*

- *As an example of the lack of master planning across the wider area, the neighbouring site at Blackmore Farm has a current planning application for 500 houses (PL/2023/11188), with a primary school and Local Centre land with no accessibility from this proposed development. In addition, there is only one footway running along Eastern Way on its Western side and not adjacent to this development. Therefore, children wishing to access the proposed primary school at Blackmore farm will have to cross Eastern Way and cross back again.*

- *Proposals do not include 40% affordable housing as per the draft Local Plan requirement.*

- *Highway Safety Concerns:*

There is the possibility of an Eastern Bypass and if the bigger highway scheme could not be afforded, Eastern Way could potentially be the Eastern route for the A350 bypass, therefore, isolating the site even further.

The impact this development will have on New Road, which is a single-track road and used as a 'rat run' to access Chippenham and the M4 via the National Trust village of Lacock including its medieval bridge which

again is single track.

Consideration needs to be given to how this site could impact the new roundabout under construction in Spa Road as part of the East of Melksham extension. This route may potentially be the preferred route by drivers to access road infrastructures North and South.

Consideration needs to be given to the provision of a roundabout on the Southern entrance to the site, as opposed to traffic lights as previously proposed in planning application PL/2023/07107, particularly as this entrance serves the larger part of the site.

Eastern Way is not well served by bus routes and would result in the reliance upon the need for travel by car, which is contrary to Core Strategy Policies 60 and 61.

Members note in the Education response, they have stated the following and raise concern "if this development comes forward prior to the housing allocation within the draft Local Plan at Blackmore Farm (adjacent to the site) which includes a primary school, there will be insufficient primary school facilities for any future primary aged children. Wiltshire Council have already stated their objection to the planning application for 650 houses at neighbouring Blackmore Farm site as there are insufficient secondary school places until the Local Plan allocation south of Melksham Oak (Policy 19) is progressed."

As part of the current review of the Neighbourhood Plan, AECOM has undertaken an independent Site Assessment and assessed SHELAA[1] site 3525, which includes this site, with the following comments:

- *Impact on non-statutory environmental designations: The site is adjacent to public open space (playing field), Primrose Drive Nature Area and located along indicative green infrastructure corridor.*
- *The central part of the site along Clackers Brook is in Flood Zone 2 and 3. The site is proposed for more vulnerable uses (residential). The sequential test and a site level exception test would need to be applied before these parts of the site could be developed.*
- *Over 15% of the wider SHELAA site is affected by high risk of surface water flooding.*
- *The site is Grade 3 Good to Moderate Quality Agricultural Land. More detailed site surveys would be required to assess whether the site is Grade 3a Good Quality Agricultural Land. (The Parish Council note in terms of potential changes to the National Planning Policy Framework (NPPF), the land has been used for food production until recently, which is planned to carry more weight in the new NPPF amendments)*
- *The site includes Public Rights of Way MELW23 and MELW22.*
- *The site has several mature and semi mature trees within its boundary. Further arboricultural assessment would be required to understand their significance.*
- *Accessibility of the site in relation to facilities being within a 5-minute walk (400m). The following areas are over a 5-minute walk away:*

Town/Local Centre/Shop: >1200m
Train Station: >1200m
Secondary School: >1600-3900m
Cycle Route: >800m

- *The site falls within the Open Clay Vale Landscape Character Area of the Melksham Neighbourhood Plan Local Landscape Character Report 2020 and the West Wiltshire Landscape Character Area Report 2006. This area has a strong sense of openness with occasional deciduous copses and ancient woods to the east. The management objectives of this Landscape Character Area are to conserve and enhance the landscape setting of Melksham, screen visually intrusive urban edge of Melksham, conserve open views across the clay vale to distant down land ridges and conserve and enhance the existing hedgerow network.*

The site contains some valued features including the Clackers Brook, continuous tree line along the Brook which provides an intimate setting and boundary vegetation. The site makes a significant contribution to the

rural and tranquil landscape character of the area. Development on the site would represent a significant advancement into open countryside, beyond the current defined settlement edge formed by the Eastern Way.

- *The site is visually open and has high intervisibility with the surrounding landscape. Development may adversely impact views of the surrounding open clay vale landscape, as well as from the Public Rights of Way crossing the site.*

- *The site strongly relates to the rural character and sense of openness of the area. Development of the site would contribute to a substantial urban expansion into open countryside.*

The Parish Council also wish to submit the following comments in relation to comments published on Catesby's website www.catesby-snarltonfarm.co.uk regarding proposals:

- *Concern is raised at proposals to release surface water into the public sewer, which is understood is not permitted.*

- *Object to proposals for Community Infrastructure Levy (CIL) funds to be used for transport infrastructure, education, health, community facilities such as indoor and outdoor sports /leisure facilities, outdoor play areas etc and green infrastructure, as these are usually included within Section 106 Agreements. It is understood developers cannot dictate what local authorities or parish/town councils can spend their CIL funding on.*

If the development were to go ahead, the Parish Council welcome the opportunity to discuss aspects of the application and be party to the s106 agreement. In addition, they would like to see:

- *Adherence to Melksham Neighbourhood Plan policies and emerging Neighbourhood Plan policies and evidence documents including the Melksham Design Guide and Housing Needs Assessment.*

- *Circular pedestrian routes around the site.*

- *The Parish Council seek the provision of play equipment above that required by the West Wiltshire District Council saved Policy in the Core Strategy and wish to enter into discussions being the nominated party for any proposed LEAPs (Local Equipped Area of Play)/Play area and seek the following:*

    - *A maintenance sum in the s106 agreement*
    - *Safety Surfacing extended beyond the play area fence line (by at least 30 cm) and for the whole area to be surfaced as such, with no joins to prevent future expansion gaps, and no grass that will require maintenance*
    - *Tarmac paths provided not hoggin.*
    - *No wooden equipment provided.*
    - *Dark Green Metal bow top fencing provided.*
    - *Clean margins around the edges, no planting.*
    - *Bins provided outside the play area.*
    - *Easy access provided for maintenance vehicles.*
    - *Public access gates painted red.*
    - *No inset symbols provided in the safety surfacing, which should be one solid surface.*
    - *Equipment installed for teenagers such as a teen shelter/MUGA and somewhere to kick a ball around.*
    - *Contribution towards playing fields.*
    - *The provision of benches and bins where there are circular pedestrian routes and public open space and the regular emptying of bins to be reflected in any future maintenance contribution.*
    - *Connectivity with existing housing development so not isolated.*
    - *There are practical art contributions and the Parish Council are involved in public art discussions.*
    - *Contribution towards improved bus services, which serve the area.*

- *Any bus shelters provided are suitable in providing Real Time Information (RTI) i.e., access to an electricity supply, Wi-Fi connectivity and are an appropriate height or provided with RTI already included.*
- *Speed limit within the site is 20mph and self-enforcing.*
- *Proposed trees are not planted on boundaries of new/existing housing, but further into public open spaces.*
- *The development is tenant blind.*
- *If adjacent to existing dwellings the design is such that the layout is garden to existing garden.*
- *The road layout is such that there are no dead ends in order that residents and refuse lorries do not need to reverse out of roads.*
- *Contribution to educational and medical facilities within the Melksham area.*
- *There is visible delineation between pavement and roads so they are easily identifiable.*
- *The provision of bird (swift boxes), bat and bee bricks, reptile refugia and hibernacula within the development, in order to increase biodiversity.*
- *There are various Rights of Way in the vicinity, which could be improved/upgraded, including the provision of lighting via Section 106 contributions from this application if approved. The provision of a footpath to access Prater's Lane from Sandridge Common (MELW40); MELW30 becoming a bridleway to connect up bridleways at MELW40 & 41. Provision of kissing gates on the various bridleways between East of Melksham and Redstocks.*
- *Provision of allotments with access to parking and water supply.*
- *Provision of convenience store with free access cash point.*
- *Ground source heat pumps to be included in proposals.*
- *To include capacity for hydrogen heating in the future within proposals.*
- *Provision of solar panels and storage batteries for every house or group of houses/block of flats.*
- *Inclusion of lifebuoys, noticeboards and defibrillators. The maintenance of these items to be undertaken by the management company, unless the council decides that they would like to take on the asset.*

• *Any housing adjacent to a potential community centre should include sound proofing and insulation to not restrict the design and activities of the community centre.*

Melksham Town Council: Objects "*as the area is already overdeveloped and congested as a result of said development. MTC fully supports the position, views and comments of Melksham Without Parish Council on this application*"

Lacock Parish Council: Objects due to the "*absence of the necessary new road infrastructure to serve such a development much of the traffic from the new houses when travelling north will choose to use New Road then Forest Lane to gain access to the A350 at the Whitehall junction. By doing this they will go through the historic village of Lacock. Lacock is already suffering the adverse effect of the traffic from all the other new developments to the east of Melksham. This is completely unacceptable and is placing a serious burden on the residents of Lacock*".

Wiltshire Council Highways Department: No objection subject to conditions and s106 contributions.

Active Travel England: Unable to support the application for the following reasons:

- *Absence of forecast multi-modal trips (hourly and daily) in addition to their distribution and assignment*
- *Transport Assessment scope confined to repeating historic car reliance in favour of committing to a step-change in movement patterns and behaviours, as required within a vision-led approach expected by National Planning Policy Framework (NPPF) paragraphs 109, 115 and 118*
- *A lack of qualitative analysis of surrounding routes and access to key destinations including the town*

centre, secondary school, strategic public transport routes and employment locations.

- *Consequent to the above matters, the absence of a package of works, mode shares that contribute towards making walking, wheeling and cycling the most convenient and attractive mode of travel and therefore realise modal shift.*

Environment Agency: No objections subject to conditions.

Wiltshire Council Drainage Authority: No objections subject to conditions.

National Trust: Objects *"there does not appear to be a Transport Assessment or Travel Plan. These are vital to make a proper assessment of the proposals and the impact of the development on the local highway network.*

Despite the lack of information and evidence, we have concerns regarding the impact of the housing development on the local road network and in particular Lacock. Motorists travelling from the east side of Melksham use New Road, Lower Woodrow and Forest Lane to access the A350 via Lacock village. (This route avoids joining the A350 at Melksham, and it is the route offered by AA Route Planner; albeit drivers tend to continue through Lacock via West Street and Cantax Hill to join the A350 at the northern junction). The use of this Melksham to A350 route is inappropriate for large volumes of traffic, and increased traffic due to housing development will exacerbate this situation. The 'rat-running' traffic using this route has an adverse impact on the historic environment, character and significance of Lacock village, and on the grade II listed Lacock Bridge over the River Avon, to the east of the village. There are also safety considerations, given that this route has to be crossed by visitors to Lacock via the pedestrian crossing in Hither Way. Plus, it involves through-traffic using the rural lanes between Melksham and Lacock, including Lower Woodrow and Forest Lane, both part of National Cycle Network route 403. We do not consider that additional housing on the east and north-east side of Melksham is appropriate unless and until it could be delivered without increasing through-traffic to/from the A350 via Lacock. We have made similar representations in response to proposed allocations in the pre-submission Wiltshire Local Plan*".

Wiltshire Council Ecology: No objection subject to conditions.

Natural England: No objection "*the proposed development would not have significant adverse impacts on statutorily protected nature conservation sites or landscapes."*

Wiltshire Council Arboricultural Officer: No objections.

Wiltshire Council Conservation Officer: No objections "*The proposals would not result in any harm to designated heritage assets. Snarlton Farm should, however, be considered as a non-designated heritage asset and proposals are required to mitigate the impact of development on its setting. I would suggest that this should include a more substantial landscape edge to the site at the northern edge to allow the proposals to meet the requirements of CP57 and 58 and para 203 of the NPPF. Subject to this being included there would be no objection to an application from the point of view of the historic built environment*."

Wiltshire Council Education: No objections subject to a S106 legal agreement towards early years and primary education. Currently, no secondary contribution is required.

- *Early Years contribution required - £17,522 x 36 = £630,792 (unchanged)*
- *Primary contribution required - 85 x £18,758 = £1,594,430 (unchanged)*

Wiltshire Council Housing Enabling Team: Policy requirement in CP43 Wiltshire Core Strategy to provide 30% on-site Affordable Housing provision with this proposal needing to provide 90 affordable units within a scheme of 300 dwellings, which would need to be secured by a S106 legal agreement.

Tenure Mix:

In accordance with Core Policies 43 and 45 of the Wiltshire Core Strategy the tenure mix should reflect local need for Affordable Housing. It should also meet the government's requirement that 25% of the Affordable Housing units are provided as First Homes. In order to meet these policy requirements, the Affordable Housing units should be provided with a tenure mix of 60% (54 units) for Affordable Rented housing, 25% (22 units) as First Homes and 15% (14 units) being provided for Shared Ownership homes.

Please note that First Homes must be discounted by a minimum of 30% against the market value, with the sale price, at first sale, no higher than £250,00 after the discount has been applied. They must be sold to qualifying first time buyers with the discount and restrictions passed on to subsequent owners in perpetuity.

Unit Size Mix:

Core Policy 45 of the Wiltshire Core Strategy states that housing size and type will be expected to reflect that of the demonstrable need for the community within which a site is located. An indicative mix which would reflect current need and policy approaches would be as follows:*

Affordable Rent (60%) = 54 units:

*25% x 1 bed 2 person flats/maisonettes ** (14)*
*8% x 2 bed 4 person bungalows** (4)*
31% x 2 bed 4 person houses (17)
28% x 3 bed 5 person houses (15)
8% x 4 bed 6 person houses (4)

NB: Blocks of l bed flats should be small (6 units/2 storey with a small parking court) and/or in house-style maisonettes (2 units) in order to integrate with surrounding houses.

First Homes (25%) = 22 units:

18% x 1 bed 2 person flats/maisonettes (4)
18% x 2 bed 3 person flats/maisonettes (4)
46% x 2 bed 4 person houses (10)
18% x 3 bed 5 person houses (4)
100% 22

Shared Ownership (15%) = 14 units:

60% x 2 bed 4 person houses (8)
40% x 3 bed 5 person houses (6)
100% 14

**Tenure mix details would need to be reviewed and confirmed prior to the submission of any Reserved Matters planning application*.

Wiltshire Council Archaeologist: No objection subject to condition.

NHS: A financial contribution is requested to provide additional primary care floorspace at existing premises totalling £311,844.

Police Liaison Officer: No comments.

Wessex Water: Requires no buildings, trees, or drainage features to be placed within 5–6 metres of key water mains crossing the site, to ensure safe access and prevent damage, and the developer must agree protection measures and accurately map all assets.

This includes no surface water attenuation features and associated earthworks in the standoff strip as changes in ground levels resulting in additional loading or excavation can lead to instability in the pressurised pipe which is carrying large volumes of water. The water main must not run through enclosed private rear gardens; it must be within a 10m (5m either side) open access strip or roads. Wessex Water require unrestricted access to maintain and repair our apparatus.

Measurements are given for a pipeline depth of between 900mm and 2000mm. The stand-off distance may increase for a strategic water main due to material, size, depth and pressure. Wessex Water reserves the right to change the requirements for specific sites or strategic mains.

The applicant would need do agree protection arrangements for the existing 300mm trunk main and 350mm distribution main which cross the site (standoff details as given above). Any damage to our apparatus by third parties will result in a compensation claim.

All apparatus must be accurately located on site and marked on deposited drawings.

Wiltshire Council Climate Team: A final Sustainable Energy Strategy is required to provide specific details of electric vehicle charging points, integrated technologies within the buildings, cycle storage, and water efficiency which can be addressed through a DOC submission.

Wiltshire Council Landscape: Objects and raises concerns over site master planning and delivering tree planting. *Other than the main access roads,* street trees seem to be little evidenced in the side streets with much of the development plot tree planting being located in back gardens as noted on the illustrative masterplan. This reliance of the masterplan on rear garden tree planting for development plot large scale planting is not considered sustainable as there will be no control over whether these trees are properly maintained or even retained by the house dwellers. Whilst planting in private back gardens is not discouraged and the Wiltshire Design Guide (WDG) suggests providing fruit trees to private gardens where the size is suitable, this should not be the primary method of achieving development plot tree growth which needs to be through an approach that integrates street trees with swales and rain gardens as indicated by the WDG.

The site has approximately 500m of Clackers Brook located within it. Previous comments highlighted the potential for not just incorporating the existing line of the brook within the PoS but also using this as an opportunity to make the line of the brook more sinuous and to construct leaky dams in order to reduce peak flows, create more diverse on site BNG habitat (subject to ecology Officer comments), and a more dynamic

PoS and habitat.

Wiltshire Council Public Protection: No objections subject to conditions.

Wiltshire Council Public Open Space: Based on a "*net gain of 300 dwellings, this would generate an on-site requirement for 10,478.40m² of Public Open Space (POS) and 531.00m² of Equipped Play. However, if this provision is not provided on-site, either wholly or partially, then an off-site financial contribution will be required to replace the on-site requirement, either in its entirety or as a supplement to a partial on-site provision.*

In the case of no on-site provision, the equivalent off-site financial contribution would be £359,997.47 for the POS requirement and £76,464.00 for the Equipped Play requirement. Target sites in the vicinity of the development for any off-site contributions would be identified at application stage.

Any on-site Equipped Play would need to be provided as per the Wiltshire Council Play Specification. All on-site POS and Equipped Play needs to be secured and managed in perpetuity. Wiltshire Council will not adopt the on-site POS or Equipped Play.

The development would also generate a requirement for 708.00m² of Sports pitches & courts, which equates to an off-site financial contribution of £70,800.00 A Target site in the vicinity of the development for any off-site contribution would be identified by the Council's Leisure Strategy Infrastructure Officer".

The Council's Public Open Space department have also stated that the Parish Council have expressed an interest in adopting new on-site areas play within its parish and that they are keen to be part of any s106 drafting engagement.

Wiltshire Council Rights of Way: No objections – the development requires s106 contributions to cover improvements to the Public Rights of Way Network, including surface upgrades, access furniture upgrades, creation of new public Rights of Way and diversion of Public Rights of Way. A contribution to cover the costs of any cycle conversion orders would also be required.

Wiltshire Council Urban Design: No comments.

Wiltshire Council Waste (Refuse & Management): Supportive subject to a s106 legal agreement to fund the provision of waste and recycling facilities/containers for each new residential unit, currently at an estimated cost of £101 per dwelling.

8. Representations

Third-party representations: A total of 19 third-party representations have been received, 17 objecting and 2 making general comments, with the following summarised concerns:

- Need to satisfy building regulation requirements
- Damage/loss of habitat and wildlife
- Loss of greenspace/agricultural land
- The development should incorporate swift bricks and universal nesting bricks
- Detrimental to the rural character
- Encroachment into the countryside

- Housing needs to go on brownfield/industrial sites
- Not enough capacity at secondary and primary schools
- Difficulty booking appointments with doctors and dentists
- Lack of infrastructure to support new households
- Lack of retail and leisure provision in the town
- Existing roads unable to manage traffic
- Additional traffic congestion
- Traffic calming measures would be needed along Eastern Way
- Increase in traffic
- Increase in speeding and car racing and anti-social behaviour
- Bypass should be approved first
- More sewage in rivers
- Potential flood risk
- Houses would not be affordable
- Pollution generated from the construction phase of the development
- Should be rejecting unplanned development
- Unsustainable location
- Isolated from facilities

9. Planning Considerations and Assessment

Section 70(2) of the Town and Country Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004 require that the determination of planning applications must be made in accordance with the Development Plan, unless material considerations indicate otherwise.

9.1 Principle of Development: The application site is located to the east of Melksham and outside of the defined limits of development for Melksham and Bowerhill Village. The application is therefore located in the open countryside.

In the adopted WCS, Core Policy 1 identifies the settlements within which sustainable development and additional housing growth is encouraged in accordance with the Council's hierarchy of Principal Settlements, Market Towns, Local Service Centres, and Large and Small Villages.

Core Policy 2 sets out how the Council will seek to deliver on the minimum requirement of providing 42,000 additional homes across the County by 2026. It outlines how this would be provided within the settlement hierarchy, allocating over half of the houses to the North and West Wiltshire Housing Market Area (HMA), which is one of the 3 HMAs in the County. Although full weight cannot be afforded to CP1 and CP2 when the Council cannot demonstrate an NPPF compliant housing land supply CP2 does set out a presumption in favour of sustainable development within the limits of development whereas land outside the settlement boundary limits, require a full justification.

The settlement boundary approach is justified in terms of providing clear, plan-led development. This approach was endorsed by the Inspector who examined the Core Strategy, who stated in his final report, that "…*by such means the Council intends to provide clarity on what forms of development may be carried out where in a manner consistent with the Framework'.*

The appointed WCS examining Inspector acknowledged that settlement boundaries in Wiltshire needed to be reviewed but stated that the correct mechanism to advance this review would be through what led to the Wiltshire Housing Sites Allocations DPD being adopted in February 2020.

The application site was not however incorporated into any revised settlement boundary for Melksham and the site is not included in either the made or advancing Joint Melksham Neighbourhood Plan(s), and as such, the proposed development conflicts with Core Policies 1, 2 and 15 of the WCS.

In light of the above, the proposed housing development is located outside of the limits of development and does not accord with the development plan and as such, it is contrary to local plan policy.

However, it is important to fully appreciate that this application is being assessed at a time when the Council cannot demonstrate a 5-year housing land supply and following revisions made by the Government to the National Planning Policy Framework (NPPF) and associated Planning Practice Guidance (PPG) in December 2024, the following commentary holds significant material weight.

Housing Land Supply and Delivery: The NPPF, within the context of a presumption in favour of sustainable development, aims to significantly boost the supply of housing. It requires LPAs to identify and regularly update a supply of specific deliverable sites sufficient to provide a housing land supply measured against the housing requirements of the housing market area identified in the WCS (a description normally abbreviated to 5 years supply). The NPPF makes it clear that where this cannot be demonstrated, relevant policies for the supply of housing (which in this case would include WCS Core Policy 2) cannot be considered up to date, and planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.

The Government issued a revised National Planning Policy Framework, accompanying Planning Practice Guidance (including the Local Housing Need calculation) and 2023 Housing Delivery Test results on 12 December 2024. This has implications for the Council's housing land supply position.

The Council have subsequently published the 2024 Housing Land Supply Statement (base date April 2024). http://www.wiltshire.gov.uk/planning-policy-monitoring-evidence This Statement now forms the basis for the Council's housing land supply position for decision-taking purposes. Notably:

- This is the first Housing Land Supply Statement to be released since the December 2024 changes to the NPPF. These changes required councils to now demonstrate a five-year housing land supply in all circumstances, have reintroduced the need to include a buffer on the housing requirement, and introduced a revised method for calculating the Local Housing Need.

- The housing land supply position for Wiltshire is **2.42 years**. This is below the five-year housing land supply required by the NPPF. This indicates that the presumption in favour of sustainable development ("tilted balance") applies in decision-taking of planning applications and appeals.

- The latest Housing Delivery Test results (which measure housing delivery over the past three years) shows that the Council has performed well in the level of housing delivery in Wiltshire. The latest results indicate that the Council have achieved **135%** of its housing requirement in the past three-year period – this requires that only a 5% buffer should be added to the housing requirement in the calculation.

- The housing land supply position used in the operation of NPPF paragraph 78 is calculated at a unitary authority level. However, the Statement also includes details of housing delivery and supply assessed against the indicative housing requirements set out in the adopted Wiltshire Core Strategy (WCS) provide more localised evidence of delivery and supply which can also be used in the decision-taking exercise.
- The housing land supply is made up of qualifying permissions and resolutions to grant, and allocations from saved district Local Plans, Wiltshire Core Strategy, Chippenham Site Allocations Plan, Wiltshire Housing Site Allocations Plan, and made Neighbourhood Plans.

- The presumption in favour of sustainable development (tilted balance') set out in paragraph 11 (d) continues to apply for Wiltshire, where relevant. This paragraph has been amended to adjust the circumstances under which protection policies set out in footnote 7 apply, and when particular regard must be had to certain policies set out in footnote 9.

- The implications of the housing land supply position, and in particular the weight to be attributed to the development plan policies, must be taken into account when determining applications. The extent of the housing land supply shortfall and how it has arisen, the actions being taken to recover the shortfall, and the potential for the proposal to deliver housing in the forthcoming five-year period to help remedy the current shortfall should also be taken into account in the balancing exercise. Following the December 2024 changes, the extent of the housing land supply shortfall has changed significantly, and the council currently has a shortfall in its housing land supply position. This should be taken into account in the balancing exercise.

- The presumption in favour of sustainable development does not mean that all applications for housing should be permitted. However, it does mean that the most important policies (which are likely to include Core Policy 2 of the Wiltshire Core Strategy in relation to settlement boundaries and housing requirements, and the relevant Community Area Strategy policy in Core Policies 4 - 33) should not have full weight applied to them in the decision-making exercise. The weight to be attributed to such policies is however a matter of judgement for the decision maker.

- Applications where the adverse impacts would significantly and demonstrably outweigh the benefits can, and should, still be refused. The shortage of a sufficient housing land supply is a material consideration in the decision-taking exercise but this, in itself, does not indicate that all housing applications should be granted permission.

- The annualised housing supply requirement for Wiltshire changed following the December 2024 Government revisions as set out below:

Number of homes per annum under previous Local Housing Need calculation[2].	Number of homes per annum under revised Local Housing Need calculation.	Percentage change
1,917	3,525	+84%

In a recent appeal at Calne (PL/2023/10421 – on land South of Abberd Lane and East of Spitfire Road, Calne) which was determined on 17 February 2025, the Inspector heavily criticised the Council in paragraph 31 by stating the following:

"***The Local Planning Authority cannot currently demonstrate a five-year supply of deliverable housing sites*** [which at the time of issuing the appeal, the Council could demonstrate a 2.03 years HLS]; ***and there have been chronic problems with housing delivery at the first-tier settlements; and the Council has been unsuccessful in resisting a number of recent appeals at lower tier settlements including Large and Small Villages. The inevitable conclusion is that, although some representations claim that development is not necessary, new house building will be required on unallocated sites. Priority should be given to the more sustainable locations***".

Wiltshire Council's Briefing Note: The Council previously published a "*5 Year Housing Land Supply and Housing Delivery Test Briefing Note No 22-09*" which sought to outline how the Council would work to restore its 5-year Housing Land Supply in the face of an acknowledged material shortfall. In this regard, a 3-pronged strategy was outlined in paragraph 6.1 which included a commitment that the Council would:

Positively consider speculative applications where there are no major policy obstacles material to the decision other than a site being outside settlement boundaries or unallocated.

Planning appeal inspectors have given significant weight to this Briefing Note in several recent appeals, including the appeal site to the south of Melksham Road in Holt (pursuant to application PL/2022/03315 – appeal APP/Y3940/W/23/3315432 refers) which was determined at a time when the Council could demonstrate a 4.59 year's supply. The briefing note merits even greater weight now given the significant

deficit and officers are committed to supporting new housing where there are no technical planning reasons to sustain a refusal as well as applying the NPPF paragraph 11d weighting assessment.

The Council has processed many applications through the years whereby the 'tilted balance' has been engaged. However, officers are fully aware that footnote 7 enshrined within the NPPF, sets out circumstances when the presumption in favour of new housing is not automatically engaged.

However, the changes introduced within the revised NPPF (December 2024) mean that the Council now has a very significant housing supply shortfall (now being 2.42 years when tested against the 5-year requirement as set out in the latest Housing Land Supply Statement published in June 2025), and it is necessary to alter and elevate the weight to be given to housing supply as part of assessing applications for residential development.

This means balancing the strengthened need to boost housing supply against any adverse impacts of the proposal when considered against the adopted development plan and NPPF as a whole, and any material considerations on a case-by-case basis.

The *Wiltshire's Housing Land Supply Statement Briefing Note No. 25-04* published on 18 June 2025 confirms that the Council's housing land supply position is 2.42 years, using a base date of April 2024, and there is a requirement for the Council to restore its five-year housing land supply, and as set out in the member briefing note ***"in the interim, where applications are being considered for sites at settlements but outside the defined settlement boundaries there may be the opportunity to improve housing supply by favourably considering housing development proposals"***.

The advancing Wiltshire Local Plan will allocate additional housing land, some of which can be delivered within five years, and therefore these would contribute towards meeting the five-year housing land supply in the future.

The below extract forms part of the Council's emerging new Local Plan and is part of the evidence base and examination topic papers (Housing Topic Paper, dated April 2025), and provides an up-to-date position on confirmed housing completions and commitments for the various Housing Market Areas (HMA), including the Chippenham HMA (which Melksham moving forward forms a part of).

The data represents the period of 1 April 2020 to 31 March 2024 as well as providing a residual total being correct as of 1 April 2024 (with the totals being rounded to the nearest ten dwellings):

Table 4.2 – Chippenham HMA

Settlement	Housing growth (2020-2038) (dwellings)	Completions and commitments (1 April 2020 - 31 March 2024)	Residual at 1 April 2024*
Chippenham	5,850	3,965	1,890
Calne	1,230	628	600
Corsham	360	95	270
Devizes	980	987	0
Malmesbury	600	651	0
Melksham	2,160	1,248	910
Rural Area	2,460	1,492	970

*Residual rounded to the nearest ten dwellings.

The above extract indicates that the projected housing growth for Melksham in the emerging Plan for the period of 2020-2038 seeks to deliver 2160 new homes. After taking away the housing completions and commitments (approved but not completed schemes), there is a material residual requirement to deliver more than 900 housings, and as will be set out in this report, officers consider this site to be suitable and capable of accommodating up to 300 dwellings in a sustainable manner, and would make a significant contribution towards addressing the current housing land supply deficit.

Neighbourhood Planning: **The made Joint Melksham Neighbourhood Plan (JMNP)** was confirmed on 7 July 2021. Therefore, the current 'made' neighbourhood plan became part of the development plan less than 5 years ago, and it is duly noted that it included a site allocation at Land at Middle Farm, Corsham Road, Whitley in addition to policies relating to new housing (Policy 6 and Policy 7).

Policy 6 of the JMNP supports sustainable housing development within the settlements of the neighbourhood area where they accord with the CP2 and the Wiltshire Housing Site Allocations Plan, include a suitable mix of housing to address the neighbourhood plan area's needs and integrates with the surrounding area. T

Policy 7 of the JMNP specifically pertains to the housing allocation site at Middle Farm in Whitley for the development of a 1.6-hectare site designated for around 18 dwellings that represents a planned housing growth site allocation to be progressed through the neighbourhood plan process.

It is appreciated that this application, which seeks speculative development on an unallocated site outside the defined settlement limits for Melksham, does not comply with Policy 6 and is not relevant to Policy 7 of the JMNP.

When tested against the NPPF, it is not in dispute that the JMNP is less than 5 years old, and the Plan contains policies and a housing allocation towards meeting the local housing needs.

However, in recognition that the adopted WCS is more than 5 years old, the housing need is defined by the county as a whole and is not based on any one settlement or community area. Furthermore, following the release of the revised NPPF in mid-December 2024 and acknowledging the Council's urgent need to address the significant housing supply deficit, significant weight must be afforded to the housing supply shortfall.

The 'emerging' Joint Melksham Neighbourhood Plan 2020 – 2038 Referendum Version is advancing. Pursuant to the above, the examiner's report was received on 2 May 2025 and concluded that subject to the modifications recommended in the report, the draft Joint Melksham Neighbourhood Plan 2 meets the Basic Conditions and should proceed to Referendum. The Council is satisfied that the draft Neighbourhood Plan, as modified, complies with the legal requirements and can proceed to Referendum with a 31 July date being targeted.

The JMNP (version 2) (JMNP2) looks to allocate land for housing (policies 7.1-7.5 refer) totalling to c.365 dwellings, plus 50 specialist dwellings for older people on the former Melksham Library Site (Policy 7.2) and a 70-bed residential care home as part of the already approved outline application at Western Way, Bowerhill (Policy 7.3) as permitted at Appeal under application PL/2022/08504, and the redevelopment of Whitley Farm (Policy 7.4).

Whilst this demonstrates a plan-led approach to delivering new housing in the local area, there would still nevertheless be a substantive HLS deficit (based on the revised NPPF calculations for HLS) even if all of these sites do come forward.

As set out within NPPF paragraph 49, LPAs may give weight to relevant policies in emerging plans according to:

a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);

b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and

c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given)[23].

The plan has material significant weight and once made, the Neighbourhood Plan will form part of the local plan framework for Wiltshire.

Policy 6 of the JMNP2 states:

Policy 6: Housing at Defined Settlements

1. Proposals for sustainable housing accommodated through development and redevelopment opportunities within existing settlement boundaries of the Plan area will be supported.

2. Housing outside settlement boundaries will be managed in accordance with the adopted Development Plan and should meet evidenced local housing need.

3. Development proposals for new housing should demonstrate how their housing types and tenures respond positively to meeting local needs, informed by the Melksham Neighbourhood Plan Area Housing Needs Assessment (2023), the Wiltshire Local Housing Needs Assessment, or any updates of these Assessments. As appropriate to their scale, nature and location, development proposals should respond positively to the following matters:

a. delivering rented and owner-occupied homes in a tenure-blind mix, design and layout;

b. increasing the supply of affordable homes in conformity with adopted Wiltshire Council affordable housing policy;

c. addressing local issues of affordability and demand for affordable homes for first time buyers and local households on below average incomes, including providing First Homes housing through developer contribution at up to a 40% discount of the open market value (where it is commercially viable to do so);

d. at Melksham and Bowerhill, prioritising the delivery of a balanced mix of two, three and four bedroom dwellings, which should include bungalows;

e. at Shaw and Whitley, increasing the proportion of two and three bedroom dwellings, to address a shortfall in their availability; and,

f. meeting the needs of an increasing local population of older people and those living with disabilities. Housing that meets part M4(2) of the Building Regulations, Category 2: accessible and adaptable dwellings will be supported. Proposals for age restricted housing and extra-care communities will be supported only in the most sustainable locations where they are closely linked to local services and public transport.

JMNP2 includes allocations of land for housing to help to meet objective 5: *Supporting sustainable development of new housing and associated facilities within settlements and, adjacent to settlements.* The plan proposes 3 sites for allocation over the plan period to 2038 in Melksham and Bowerhill to contribute towards meeting housing requirements and local needs, as well as delivering a sustainable approach to plan-led development with the overall objective being to secure the best possible outcomes from development for local communities. The allocated sites are:

4.8.1 Site allocations:

At Melksham and Bowerhill

- 7.1 - Land at Cooper Tires
- 7.2 - Land at the Former Melksham Library, Lowbourne House and Car Park
- 7.3 - Land South of Western Way, Bowerhill

The application site was put forward and considered under the Wiltshire Council Strategic Housing and Economic Land Availability Assessment (SHELAA) process, but it was not selected. On the matter of site selection, the Referendum NDP says:

"Melksham Brownfield Site Allocations (Policies 7.1 and 7.2)
4.8.5 Wiltshire Council, together with Melksham Town Council and Melksham Without Parish Council, have agreed a collaborative approach to coordinate Local Plan strategic allocation of greenfield sites with the sustainable brownfield-led approach to site allocations in the town by JMNP2.

4.8.6 Community engagement undertaken to shape the Melksham Town Centre Masterplan Report20 identified strong support for the regeneration of both the Cooper Tires site and the former library site. Assessment of greenfield and brownfield-led site allocation options through Strategic Environmental Assessment of the potential allocations confirmed that JMNP2 brownfield sites represent the most sustainable and deliverable approach. NPPF Paragraph 124(c) states policy should "…give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated …land".

Referendum JMNP2 Policy 19 is a new policy which considers the separation of settlements. It goes further than the Core Strategy policies CP1 and CP2, stating,

"*Development proposals which would result in the loss of, or an unacceptable reduction of the contribution which it makes to the separation of the settlements concerned will not be supported."*

The application site, being a greenfield site outside the settlement boundary, does not form part of the JMNP2 strategy and is not part of the plan led vision for the future of the settlement as envisaged by the JMNP2 and WCS. Significant weight merits being attached to this matter in the planning balance.

Regarding the relevance of the made Joint Melksham Neighbourhood Plan, paragraph 14 of the NPPF states that in situations where the presumption (at paragraph 11d) applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided all the following apply:

a) The neighbourhood plan became part of the development plan five years or less before the date on which the decision is made:
b) The neighbourhood plan contains policies and allocations to meet its identified housing requirement (see paragraphs 69-70)

This application proposal is contrary to the strategic policies of the Wiltshire Core Strategy and the made Joint Melksham Neighbourhood Plan. However it would provide a meaningful contribution towards the Council's housing land supply, at a time when the Council has a significant undersupply (created by a slowdown in developers not advancing schemes as quickly as first projected, as well as taking into account the latest NPPF/Government revisions) while providing some additional affordable housing, and this must be weighed in the planning balance.

The remainder of this report will review the technical and material planning considerations which merit being part of the planning balance.

9.2 Flood Risk and Drainage: Adopted WCS CP67 requires all new development to include measures to reduce the rate of rainwater run-off and improve rainwater infiltration to soil and ground (SuDs). Whilst paragraph 181 of the NPPF requires local planning authorities, when determining planning applications, to ensure that "*that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment*".

The submitted Flood Risk Assessment and Surface Water Drainage Strategy (produced by RSK LDE Ltd, reference 680831-R1(2)-FRA, dated May 2025) confirms that the site is impacted by Flood Zones 1, 2 and 3, with Flood Zones 2 and 3 being located either side of Clackers Brook and the proposed development and developable areas being restricted to land that is flood zone 1 only.

In terms of the risk of surface water flooding, the majority of the subject site's developable areas are at low risk, with surface water to be managed on-site utilising SuDS, to store the volume of water associated with a 1 in 100-year rainfall event (including an allowance for climate change).

The area of land at surface water risk does not form part of a wider surface water flow path. This is critical, as the surface water ponding would be generated within the site boundary without external influence and would therefore be controlled and managed on-site as part of the future surface water drainage scheme. In reality, they are shallow, localised depressions, typical of many agricultural fields, as expanded upon below.

The main area of land within the application red lined site area at risk from surface water flooding is located in the northeastern part of the site and is isolated, relating to a shallow depression within the site boundary, within an area that generally falls north to south towards the Clacker's Brook.

Reference to the site-specific topographic survey (as included within Appendix B of the submitted FRA) illustrates that the slight depressions would generate a *maximum* flood depth of approximately 200mm, and typically depths of between 0mm and 150mm, which is not grounds for substantive concern as far as the Council's drainage authority is concerned, and is considered low level, low-risk and typical of most agricultural fields, and would be addressed via mitigation by appropriate surface water drainage design, and as referenced by the applicants FRA, dated May 2025.

From the details submitted within the FRA, the areas of surface water flood risk would effectively disappear post development by minor land reprofiling, typical of any residential development (as the depressions are only circa 0mm-150mm) and through on-site drainage betterment and a formal drainage strategy with runoff rates being limited to greenfield rates, with significant attenuation provided (to accommodate the 100 year climate change storm event, where there is none currently).

The Council's drainage officer (representing the Lead Local Flood Authority (LLFA)) has confirmed that applicant's "*plans to restrict discharge rates from the site to the greenfield Qbar rate (corresponding to the 1 in 2.33year rainfall event) for all events up to the 1in 100year + climate change storm; [and] it is acknowledged that for the higher return period rainfall events this will provide betterment, however this will not provide the required level of betterment for lower return period events (such as the 1 in 1 year rainfall event)*".

Part 2.1 of the Council's Drainage and Betterment Strategy (dated June 2024) states the following:

"With regards the control of surface water discharges from new development, Wiltshire Council requires post development discharges from greenfield sites to provide 30% betterment over pre-development discharges for all storm events between the 1 in 1year and 1 in 100year return period events.

For greenfield development, the runoff volume from the development to any highway drain, sewer or surface water body in the 1 in 100-year, 6-hour rainfall event should never exceed the greenfield runoff volume for the same event."

The Council's drainage officer has therefore requested additional information to be submitted through planning condition(s) to demonstrate that the required 30% betterment against the greenfield rates can be achieved for all storm events between the 1 in 1 year and the 1 in 100 year return period storm events, and to confirm that there is sufficient capacity to fully attenuate the 1 in 100 year plus climate change storm event.

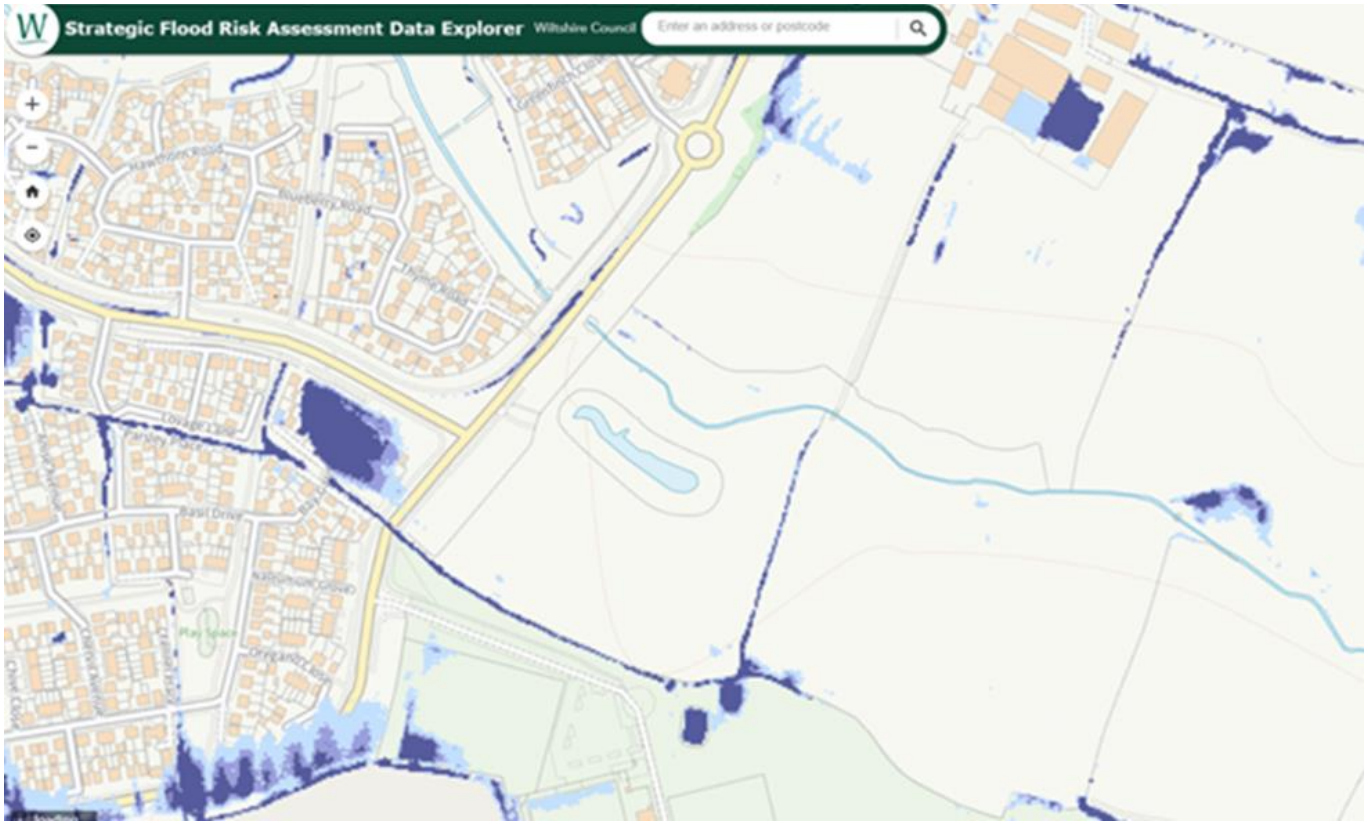
Based on the information submitted to date, and following meetings that took place when this report was being advanced, it is considered that the above requirements can be delivered.

The applicant's appointed flood risk and drainage consultants have also confirmed that there is ample space available within the application site to extend the existing indicative SuDS basin features, which would enable the basins to accommodate any minor increase in attenuation as a result of further reducing the discharge rates, to comply with the updated Wiltshire Council's Drainage and Betterment Strategy, as quoted above.

This is the case for all four sub-catchments within the site and would not conflict or compromise with any other technical considerations, such as landscaping or floodplain extents. This would be fully appraised as part of a Reserved Matters application and/or at the discharge of conditions submission stage (at a later date), once the final design details of the development are known.

The applicant's appointed flood risk and drainage consultants have also clarified that the submitted surface water drainage strategy includes a 20% reduction on Greenfield (QBAR) runoff rates (as set out in Section 7.3 of the submitted FRA), which was the LLFA requirement up to June 2024, when the Council's 'Drainage & Betterment Strategy' was last updated, so the required further reduction in discharge rates (in order to achieve a 30% reduction as opposed to a 20% reduction) would be negligible and can be accommodated on-site.

The Council's drainage officer has also assessed the site on the 2d rainfall-on-mesh topographic model - which, when considering the lowest depth band available on the Environment Agency's map (exceeding 200mm flood depth), produces the below image demonstrating that the pluvial flooding on the site relates to either existing ditch channels or topographical low points. Importantly, the mapping also confirms there are no identified surface water flow paths from outside the site boundary; therefore, the ponding areas relate to runoff originating on-site (i.e. shallow depressions), which can be managed on-site by the proposed drainage system. As such, no objections have been raised by the drainage authority, as it is considered that the residual risk can be wholly and safely managed on-site. Similarly, no objection has been raised by the Environment Agency.



Planning and drainage officers maintain that the additional required information, relating to the drainage strategy for this site, can be suitably secured by planning conditions, with specific details of the proposed surface water drainage strategy to be submitted at Reserved Matters and/or through a discharge of condition process.

It is important to note that the layout of this site has not been confirmed at this outline stage and any future Reserved Matters/discharge of conditions application would need to demonstrate how the finalised

development layout would not be susceptible to any sources of flood risk.

A detailed drainage strategy for this site would also need to fully accord with and comply with the new National Standards for SuDS (published on 19 June 2025).

Through the details submitted and use of planning conditions, the mapped flood risk would be improved on the site and the residual risks would be negligible. The development would need to comply with a range of planning conditions to commission and submit a drainage strategy to suitably manage risk for the lifetime of the development.

It is proposed that the finished floor levels for the future housing (all within Flood Zone 1) would be raised approximately 300mm above the surrounding ground levels in some areas (particularly in the southern parcel of the site) to provide sufficient protection during an extreme event. This is typical of most residential development and is considered acceptable. Furthermore, the main vehicular access points from Eastern Way would be located in Flood Zone 1 to ensure that safe access and egress would remain achievable at all times. It is also important to note that the indicative layout plan also shows that all dwellings and associated infrastructure, such as attenuation basins, can be located in Flood Zone 1.

The proposed SuDS measures would include the use of permeable paving, roadside swales and attenuation basins within the area of open space. The proposed SuDS features would be designed to provide a volume of 1 in 100 plus 40% climate change event, with both parcels having an outfall into the Clackers Brook.

Page 23 of the submitted FRA and Drainage Strategy document confirms that "*the features have been designed up to 1.4m deep and have a minimum side slope of 1:4 to comply with safety and maintenance guidelines as highlighted in the SuDS Manual*", and such an approach is considered acceptable.

As submitted, flood risk would not be increased off site, and through the delivery of on-site attenuation and bettering the existing greenfield discharge rate, the land drainage would be improved locally. The proposals would, therefore, be safe and acceptable from a flood risk and drainage perspective.

In light of the above assessment, and subject to planning conditions being imposed, the Council's drainage officer has raised no technical objections to the proposed scheme and has confirmed that an appropriate surface water strategy can be implemented to manage pluvial flood risk on-site.

The extent of pluvial flooding risk for the site is limited, with it largely relating to 'ponding' on the site in existing depressions, with the flood risk mapping and latest FRA indicating that that depth of the ponding would be shallow (i.e. less than 200mm).

There would be no risk related to interrupting an off-site surface water flow path, or effect off-site properties. In reality, the risk is a fairly typical situation on agricultural land and with the indicated drainage betterment requirement, it would fall to the detailed design stage of the proposal at Reserved Matters and discharge of condition stage to verify the precise land levels, drainage solutions, and compliance.

Given the limited nature of the mapped surface water flood risk, designing out the flood risk can be comfortably accommodated as part of the detailed design process.

With regard to the comments from Wessex Water, a revised Indicative Masterplan was uploaded on receipt of their original objection with Wessex Water's apparatus overlaid, which demonstrates that suitable off-sets (of 5m) to Wessex Water's assets and infrastructure can be achieved. It is important to mention that the layout at this outline stage is however not fixed and would be a matter for future consideration as part of any reserved matters application.

9.3 Loss of Agricultural Land: NPPF Paragraph 187 refers to decision making contributing to and enhancing the natural local environment by:

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.

The site's agricultural land classification is mapped as follows:



The application site is a combination of Grade 3a (shown above in dark green) and Grade 3b (which accounts for most of the site and is shown in light green colouring) with a small area of Grade 2 in the far southwestern part of the application site (illustrated by the light blue shading) part of which relates to the existing attenuation basin that falls outside the application red line.

In this particular case, regard should be given to the site having existing residential to the east, the construction of the Eastern Way bypass (over mostly grade 2 and 3a land), the established sports facility to the south, and planning approval being recently endorsed for a 500 house development on land at Blackmore Farm to the north of Snarlton Farm, which in combination has and will continue to change the character of this part of Melksham. This residential proposal would further contribute towards the urbanisation of greenfield land and would result in additional loss of best most versatile agricultural land. However, the economic and other benefits of the land remaining in agricultural use must be weighed against the substantive benefits of delivering a significant quantum of housing at a time when the Council cannot demonstrate a 5-year housing land supply.

A Landscape and Visual Impact Assessment (LVIA) has appraised the visual and landscape impacts which would be localised and would not have a significant effect on the wider landscape or setting of Melksham.

This report ends with a section on the consequential loss of the best and moderate agricultural grade land in the planning balance, which must be considered alongside all the other material considerations.

9.4 Layout, Design and Visual Impact: As this application is in outline with the vehicular means of access being the only detailed matter open for consideration at this stage, the design, layout, scale, appearance and landscaping are not maters to be assessed at this stage but would need to be addressed as part of any future reserved matters application. It is however necessary for the Council to be satisfied that the proposed quantum of development (of up to 300 dwellings) can be adequately accommodated across the application site, to ensure that a high standard of design can be achieved.

Core Policy 45 of the adopted WCS requires "*new housing, both market and affordable, must be well*

designed to address local housing need incorporating a range of different types, tenures and sizes of homes to create mixed and balanced communities".

Criterion ii of Policy 6 of the made JMNP also requires "*a suitable mix of house types, sizes and tenures*" to be informed by and to address the current housing needs for Melksham and Bowerhill.
In addition to the above policy, Core Policy 51 ('Landscape') of the WCS states that new development should protect, conserve and where possible, enhance landscape character. The policy requires applications to demonstrate how development proposals conserve and where possible enhance landscape character through sensitive design, landscape mitigation and enhancement measures.

Core Policy 57 of the adopted WCS requires a "*high standard of design*" for all new developments. This policy requires developments to "*create a strong sense of place through drawing on the local context and being complementary to the locality*" with applications being accompanied by appropriate information to demonstrate how the proposal would "*make a positive contribution to the character of Wiltshire*" and sets out a list of criteria that proposals for new development must comply with.

Policy 18 of the made JMNP also requires proposals to "*contribute positively to the conservation, enhancement and extension of the quality and local distinctiveness of Melksham and Melksham Without*" and requires proposals for major development to "*demonstrate through a masterplan how the proposed development layout, density, access proposals and building design approach complement and extend the positive characteristics of Melksham and Melksham Without settlements and landscape, both historic and topographic*".

In addition, paragraph 131 of the Framework seeks the "*creation of high quality, beautiful and sustainable buildings and places…"*

Paragraph 135 of the Framework sets out a series of criteria which planning policies and decisions should ensure developments create, including being of high quality over the lifetime of the development, being visually attractive and sympathetic to the local character and history, creating a strong sense of place and creating places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users.

Paragraph 136 makes special reference to trees within developments stating that trees "*make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate chan*ge" and continues to state that both planning policies and decisions "*should ensure that new streets are tree-lined*".

This outline application has been accompanied by an illustrative masterplan (drawing no. 22b), development parameter plan (drawing no. AI14h), in addition to a Design and Access Statement (DAS) (Rev D, dated July 2024) with an addendum Design and Access Statement (Rev C, dated 6 March 2025) following the application being subject to an independent Design Review in February 2025.

These plans and documents demonstrate the developable area and illustrate how the site could indicatively be laid out.

The DAS sets out the vision for the development, with an aim for the development to comprise a mix of housing and affordable housing that would be designed to "*rigorous energy standards*", situated close to existing schools, shops and public transport links.

The proposal seeks to provide up to 300 dwellings across a developable area of c. 8.68 hectares, which would represent a c.35 dwellings per hectare (dph) density, which is considered acceptable. For comparison, the gross housing density for the nearby Land at Blackmore Farm site (application PL/2023/11188), which gained Members' endorsement in January 2025, indicatively proposed a density of 38.9dph.

The below table extract is taken from the applicant's cover letter accompanying the revised access drawings) and was received on 22 May 2025 which demonstrates the proposed land use budget for the site, incorporating the highway-based revisions to accommodate the proposed roundabout to serve the southern aspect of the site.

	Ha	Ac	Dwellings at 34.6dph
Residential Developable	8.68	21.45	**300**
Community Use Area	0.32	0.79	
Open Space (incl. SUDS & Children's Play)	8.76	21.65	
Highways	1.39	3.43	
Allotments	0.13	0.32	
TOTAL	**19.28**	**47.64**	**300**

Officers are also mindful of NPPF para 130 that seeks new housing development to male sufficient use of land and to avoid low densities, with the Government stressing the following:

"***Where there is an existing*** *or anticipated* ***shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site.***" [emphasis added by officers]

In light of the above, given the need to keep housing outside of flood zones 2 ad 3 and to have a centralised green lung, the proposed density is considered acceptable.

The proposal also includes net gains for biodiversity (which is covered in detail later in this report), providing 8.76 hectares of open space, 0.13 hectares for allotments or an orchard, and 0.32 hectares of community use (either in the form of a building or open space) that would be confirmed as part of a future Reserved Matters application.

Whilst the Parish Council have raised concerns with this proposal seeking to provide an on-site community facility, the Parish Council do not have to take on the responsibility of this themselves, as this community use could be managed by another community group/club – details of which would need to be confirmed at Reserved Matters state.

The applicant has nevertheless agreed to contribute towards the cost of building a new community hub to serve the eastern side of Melksham, which has Committee endorsement to be provided on the nearby Blackmore Farm site to the north, and the details of this developer commitment are set out within the legal contribution section of this report.

The proposal includes a buffer either side of the Clackers Brooks for natural drainage purposes associated with the floodplain, with attenuation basins to be strategically placed on land in Flood Zone 1 and would be designed to provide ecological benefits.

The indicative layout includes the formal provision of a play area for children, with a dedicated space for older children and an information grassed area to be used as a kickabout area. The play areas would be distributed across the site to ensure they are accessible from the dwellings and maximise natural surveillance.

In terms of placemaking principles, the submitted DAS addendum which was submitted following the Design Review Panel with Design West in February 2025, confirms from page 8 that the urban form should include perimeter blocks with active frontages to the public realm, with focal buildings/spaces with defined gateways. The dwellings are likely to be a range of 2–3 storeys, with buildings set back from the pavement. There is also a commitment to provide tree-lined streets, with the retention of veteran trees and hedgerows, enhancement of the Clackers Brook and new native planting.

In terms of the design and appearance of the proposed dwellings and buildings, and the overall layout of the site, these would be matters for any future reserved matters submission(s). However, to secure the key principles set out in the submitted DAS, this can be secured by condition at outline stage to establish the parameters and commitments to deliver a high-quality design at the Reserved Matters application stage.

In terms of landscape impacts, it is appreciated that the proposed development would result in a change in character through the change of use from agricultural to residential use, and by the development of up to 300 dwellings with associated roads and ancillary infrastructure.

The application has been accompanied by a Landscape and Visual Impact Assessment (LVIA) Addendum (produced by LDA Design, dated July 2024) which considers that there would be some impacts through the loss of a greenfield, but such impacts would be on a localised level, as detailed on page 3 of the submitted LVIA:

"[The] e*ffects on landscape character would be at their greatest within the Site and its immediate context, being at most of a Medium Magnitude and Moderate-Slight. Effects are judged to be Adverse owing to the loss of a greenfield site, but it is considered that the Proposed Development would relate well to, and be characteristic of, the existing built environment and would not affect any of the key characteristics of the wider landscape*."

The LVIA continues by stating that the impacts would reduce further out from the site, with the "*effects on the Wooded Greensands Hills LCA would be of Low/Negligible magnitude, Slight/Minimal, and, on balance, Neutral with barely perceptible differences to the characteristics of the landscape*".

It is appreciated that there would be a change in views gained from the immediate public footpaths (namely via MELW22 adjacent to Clackers Brook and MELW23 to the south), with the loss of agricultural land and the construction of dwellings, however the LVIA argues that "*the proposed residential properties will be seen within the context of the existing Melksham settlement edge, Snarlton Farm buildings and the Melksham Football and Rugby Club, forming an addition to the existing built fabric*".

To the north and east, the LVIA considers the proposed development to be "*largely screened by intervening vegetation and built form and will not appear prominent within views but perceived as forming part of Melksham's eastern settlement edge*".

The LVIA concludes that "*no significant environmental effects were identified in landscape and visual terms*", with any harm being "*limited in geographically extent and typical of greenfield development*".

It is noted that the Council's Landscape Officer has raised a holding objection to the proposal, raising concerns over the lack of a wider masterplan for the eastern side of Melksham, and with this proposal seeking to 'future proof' the provision of agricultural access points along the eastern boundary of the site.

The landscape concerns about sufficient landscape planting on the eastern edge of the site and tree planting throughout the site would be matters for a future Reserved Matters application(s), as landscaping and layout are not matters open for the Council to consider at this stage.

The application is supported by an Arboricultural Impact Assessment (produced by The Environmental Dimension Partnership Ltd, dated July 2024) and a Tree Retention and Removal Plan (reference

edp8111_d002b, Rev b) which confirms that all Category A (high quality) and Category B (moderate quality) trees would be retained.

The assessments identify 6 Category C (low quality) trees impacted by the proposals, with 4 stretches of hedgerow to be partially removed and 2 field maples (T95 and T96) to be felled.

The Council's tree officer has raised no objection subject to a planning condition requiring a Tree Protection Plan and Arboricultural Method Statement, prepared by a qualified Arboriculturalist and in accordance with BS5837:2012.

The public right of way to the north of the Clackers Brook (MELW22) would remain, with MELW23 to the south requiring to be partially diverted to accommodate the proposed development.

An internal footbridge would be constructed over the Clackers Brook to connect the two parcels of development, where an existing field access is located presently. The public rights of way would be embedded within the green infrastructure proposals.

On the basis of the above, officers are satisfied that the proposal can deliver a high-quality housing development at a time when there is a significant housing land supply deficit.

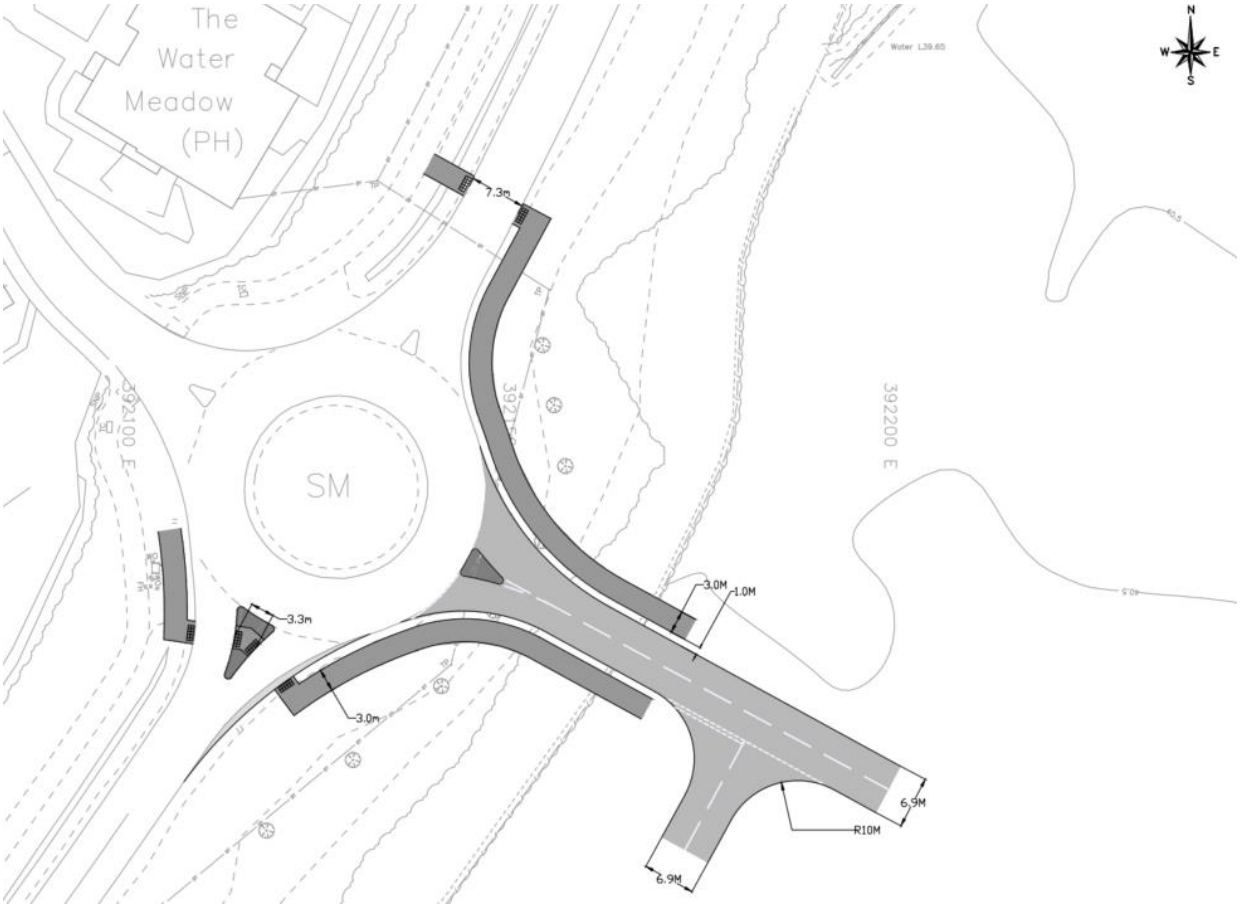
9.5 Highway Safety: Criterion xiv of CP57 of the adopted WCS requires proposals to satisfy the requirements of CP61. Policy CP61 requires new developments to be "*located and designed to reduce the need to travel particularly by private car, and to encourage the use of sustainable transport alternatives*". CP61 also requires in criterion ii that proposals would be "*capable of being served by safe access to the highway network*". In addition, CP64 of the adopted WCS requires adherence to residential parking standards.

In addition to the abovementioned policies, paragraph 116 of the NPPF states that developments "*should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe*".

It is important to appreciate that this outline application is only seeking detailed consideration on the two proposed means of vehicular access onto Eastern Way, with all the other matters, including internal road layouts, being reserved for future consideration.

This application is seeking to provide two new vehicular access point from Eastern Way, one to the north through the formation of new arm (creating a fourth arm) of an existing Cranesbill Road roundabout; and one to the south of Clackers Brook (close to the Melksham Football and Rugby Club) where a four way signalised crossroad junction was originally proposed but through officer negotiations, this has now been revised to a 36m diameter roundabout, in response to concerns raised by the Council's local highways authority.

To the north, the proposed access includes a new fourth arm off the existing roundabout with a toucan crossing to be provided north of this, as endorsed by the SPC decision to support the approval of the Blackmore Farm development (application PL/2023/11188 refers).



Proposed North Access – Formation of fourth arm off existing roundabout

The submitted Transport Assessment (produced by DTA Transport Planning Consultants, reference 18507-04b, dated 4 July 2024) states that the applicant proposes a new toucan crossing point along Eastern Way (between the two access points proposed as part of this application) near existing bus stops to provide a shared footway and cycleway crossing opportunity, which would also link up to existing public rights of way.

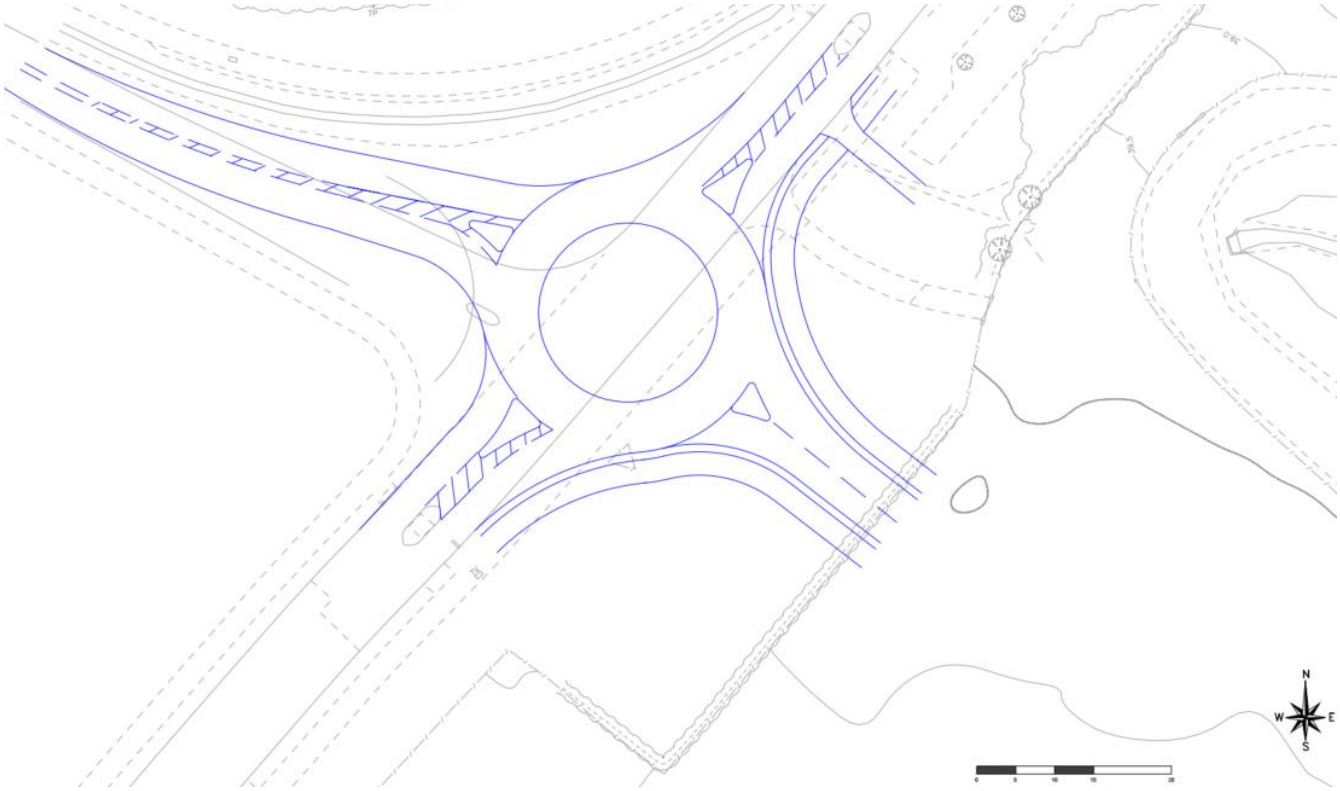
The provision of such a crossing is supported by officers, as this would aid with active travel and assist in connecting the proposed development with Melksham town centre to the west, due to the severance caused by Eastern Way.

The Council's highways department has recommended conditions relating to the provision of such facilities, which are considered necessary and reasonable.

With regard to the southern access, the Council's highway officer raised concerns about the initially proposed signalised junction to serve the southern part of the application site and argued that it would not align with the existing measures for maintaining traffic flow and was deemed excessive for a development of up to 300 dwellings.

Concerns were raised that the originally proposed signalised junction would be underutilised and would prioritise vehicle movement over walking and cycling, contrary to paragraph 117 of the NPPF, which requires development to give priority to pedestrian and cycle movements first.

It is also important to appreciate that the immediate area is characterised by roundabouts rather than signalised junctions, and the now proposed roundabout is considered a more suitable solution.



Proposed South Access – Formation of a new roundabout

It has been noted that the highways authority would prefer to have a single point of access to serve the whole site, but due to the Clackers Brook the option of delivering a singular access to serve the two developable land parcels is not deliverable in light of the ecological, flood risk and landscape sensitivities.

The applicant sets out in their Transport Technical Note 3 (reference 18507-11a, dated 10 February 2025) that the bridge would need to measure 100m in length and 30m in width to avoid the Flood Zones at Clackers Brook.

The Council's ecologist also confirmed in their response dated 21 February 2025 that they shared the applicant's own consultant ecologist's concerns with such an approach (as set out in the Technical Note produced by Ethos Environmental Planning dated 11 February 2025) about a singular access serving both land parcels.

The applicant was therefore invited to assess the potential of delivering a roundabout to serve the southern land parcel making use of the land they have control over as well as highway land.

Revised detailed drawings were submitted on 22 May 2025 to demonstrate a commitment to create a new roundabout instead of the previously proposed signalised junction, and this was subject to a fresh consultation exercise.

With reference to the applicant's Transport Technical Note 5 (produced by DTA Transport Planning Consultation, reference 18507-14, dated 3 March 2025), the revised southern access has been assessed using ARCADY modelling and shown to operate within capacity under 2036 scenarios, with or without the Melksham Bypass. A Stage 1 Road Safety Audit (RSA) has been undertaken, and the applicant has committed to addressing all identified issues.

The Council's highways department confirmed in their support on 19 June 2025 pursuant to the site being accessed off two roundabouts with no capacity concerns, based on the forecasted traffic demand, and this is based on whether a new Melksham Bypass is delivered or not.
From a highway perspective, the proposed access arrangements are appropriate for the scale of

development with the proposed accesses now reflecting a more context-sensitive solution in keeping with the existing Eastern Way highway corridor.

Regarding on-site parking provision, section 5.4 of the submitted Transport Assessment states that parking would be a reserved matter, but it is important to mention that adherence to the Council's adopted car and cycle parking standards would be required at the detailed design stage and would need to be factored into the future layout of the proposal.

It is also important to stress that NPPF paragraph 116 clearly states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety.

From reviewing the supporting technical details, the highways officer raises no objection, subject to planning conditions (and a sealed legal agreement) and considers the access points to serve the proposed development to be acceptable when tested against the NPPF and local plan policy and highway standards.

In terms of sustainability, the proposed development would be accessible by public transport, walking, and cycling, and would integrate with the existing developments to the west and the 500-house development recently endorsed by the Committee for land to the north at Blackmore Farm – which was approved by this Council on 12 May 2025 after the completion of a s106 legal agreement.

The below table is taken from the applicant's submitted Transport Assessment, and sets out the local bus services, with the number 14 and 16 bus services being located along Eastern Way, with access thereto being close to the site. Melksham railway station is located approximately 2.5km from the site and is within a similar distance that was supported for the Blackmore Farm site being within a reasonable cycling distance.

Table 7 – Local Bus Services and Frequencies

Service No.	Route	Frequency		
		Mon-Fri	Saturday	Sunday
14	Melksham Metro	PM service 13:56, 16:46, 17:51	PM service 13:56, 15:01, 16:01, 16:41, 17:21	No Service
15	Melksham Town Service	AM 10:19 PM 12:19	AM 10:19 PM 12:19	No Service
271	Bath - Bathford - Melksham - Bowerhill	Hourly	Hourly	No Service
272	Bath - Box - Melksham - Devizes	Hourly	Hourly	No Service
273	Bath - Box - Melksham - Devizes	PM service	PM service	Every 2 hours
X34	Frome - Trowbridge - Chippenham	One AM and One PM service	No Service	No Service

*Services correct June 2024

In terms of local services, the Transport Statement submits that these are within *"suitable walking distance of the site, there are local facilities and services including a Co-op convenience store (and cash point), Fish & chips shop, charity shop, pub located off Cranesbill Road to the north-west of the site. Morrisons Daily is located around 1.4km to the west of the site. Waitrose and Sainsbury's are located around 2km to the west of the site*".

The site is also reasonably well located in terms of access to local schools, including "Forest & Sandridge located approximately 400m to the north-west of the site. Aloeric Primary School and Bowerhill Primary

School are around 1.5km walking distance from the site.

The nearest secondary school is Melksham Oak Community School, accessible off Bath Road about 1.9km walking distance south of the site and would be closer than the recently approved Blackmore Farm housing development.

In terms of the distances to various local services, the below table, taken from paragraph 3.8.4 of the Transport Assessment provides an indication of how long it may take to walk to the local facilities within a 30-minute walk of the site:

Table 10 – Distances to local facilities (measured from site accesses)

Facility	Proposed Site	Walking Time (1.4 m/s)	Cycling Time (4.2m/s)
Bus Stops	400m	5	2
Primary School	400m	5	2
Convenience Store/ Supermarket	300m	3	1
Nursery	630m	8	3
Doctors Surgery	1.2km	14	5
Pharmacy	1.4km	17	6
Secondary School	1.9km	23	8
Employment	1.9km	23	7
Leisure Facility	2.0km	24	8
Post Office	2.1km	25	8
Library	2.2km	26	8

Whilst it is appreciated that the subject site is located outside the Melksham settlement limits, its proximity to existing residential development to the west and to the emerging housing allocation on land to the north that now benefits form outline planning permission for up to 500 dwellings at Blackmore Farm, officers argue that in the absence of technical grounds to refuse the application, whilst the Council has such a significant housing land supply deficit, this site on the edge of Melksham is a sustainable location for future housing growth.

The Council's highways department has suggested a number of s106 contributions to go towards pedestrian and cycle route improvements and public right of ways improvements.

It is noted that there are a number of Public Rights of Way (PRoW) crossing the site, and MELW22 adjacent to the Clackers Brook (which connects to MELW26 to the east) would be retained. At this stage, it is likely that MELW23 within the southern part of the site would need a diversion to facilitate the southern block of residential development. However, this is dependent on the final layout details and would be a matter for a follow up application and separate Rights of Way diversion application. It is considered reasonable, given the size and location of the site to request s106 contributions towards PRoW improvement in the vicinity of the site.

Subject to the recommended conditions and planning obligations, no highway based reason for refusal has been put forward and no conflict with NPPF paragraph 116 of the NPPF has been identified, and when tested against the NPPF as well as local plan policy, there are no substantive highway reasons to refuse the application on the basis that there would be no unacceptable highway impacts on highway safety or severe residual cumulative road network impacts (following mitigation).

9.6 Heritage Impacts: Where applicable, the NPPF requires that 'great weight' should be given to the

conservation of heritage assets and advises that a balanced approach with the public benefits which may result from proposals being weighed against any harm caused. NPPF Paragraph 207 advises that "*where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation*".

Core Policy 57 of the adopted WCS not only requires a "*high standard of design"* criterion iv requires new development to be *"sympathetic to and conserve[e] historic buildings and historic landscapes"*. CP58 of the adopted WCS similarly sets that the new development *"should protect, conserve and where possible enhance the historic environment"* and that designated heritage assets and their settings should be *"conserved, and where appropriate enhanced in a manner appropriate to their significance"*.

The submitted Archaeology and Heritage Assessment (produced by BSA Heritage Ltd, reference BSA 2316_1c, dated July 2024) states within section 3.3 that there are "*no designated heritage assets within almost a kilometre's radius of the site*" with the closest property being the "*Grade II listed 'Blackmore House', which is a former farmhouse of likely 18th century origin which lies almost a kilometre north of the site...It was clear from initial research that change within the site would not harm the significance of this asset and this was confirmed during the site visit*".

The Council's Principal Conservation Officer advises that the "*Photographs in the Archaeology and Heritage Assessment confirm that the farmhouse* [Little Snarlton farmhouse], *which lies to the west of the modern complex, should be considered as a non-designated heritage asset as the house and associated outbuilding and walls comprising an historic building. The former farm complex to the east, however, appears to be wholly modern*" but the proposal would not affect any designated heritage assets.

Officers appreciate that the setting of Little Snarlton has altered given the extent of the change of use and development, and the Council's conservation officer submits that the "*house remains recognisably a farmhouse set within a farmyard and surrounded by undeveloped agricultural land and the development will inevitably contribute to further erosion of this setting such that the experience of the asset will be diminished, resulting in some harm*".

NPPF Paragraph 216 requires that the "*effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset*".

In this instance, it is recommended that mitigation be incorporated, through the provision of an undeveloped buffer, "*to preserve some sense of its agricultural context*".

The submitted Indicative Masterplan shows a separation distance of c.171 metres between Little Snarlton and the northern edge of the development site, with a landscaped buffer in between. As landscape is not a matter open for consideration at this stage, a planning condition would be appropriate at this stage to secure this buffer mitigation.

In terms of archaeology, following receipt of the archaeological evaluation, the Council's Archaeologist removed their objection, subject to a planning condition relating to a programme of archaeological investigation, which is considered reasonable given that moderate preserved archaeological remains that were found during the on-site surveying.

NPPF Paragraph 207 advises that "*where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation*".

The submitted Archaeological Evaluation conducted by Foundations Archaeology dated January 2025 (reference 1680) carried out an evaluation of 63 trenches which included the presence of moderate

preserved archaeological remains to the north and eastern parts of the field. The recovered artefacts indicate that the enclosures "*were related to Roman agricultural activity and/or occupation, which potentially spanned the Roman period. A small amount of residual struck flint, as well as some Medieval pottery indicated a low potential for Prehistoric and post-Roman activity within the site*".

The Council's Archaeologist concluded that *"it is clear that the site contains extensive remains of agricultural enclosures and settlement sites dating from the Roman period. It is also clear that due to the unfriendly ground conditions experienced during the evaluation, it was not possible to fully investigate all of the features encountered within the trial trenches. While this was not the fault of the archaeological contractor, the fact remains that we are left with only a partial understanding of the archaeological activity within the proposed development area*". As such, it has been possible to conclude "*that the site does not contain any nationally important heritage assets*".

The evaluation results have however, identified local significance archaeology, and the Council's archaeologist advises that notwithstanding the results of the trial trenching, the site may have more interest *and* as such, additional extensive investigations are required prior to the construction phase of the development, and this requirement can be secured by a planning condition.

Based on the above, it is considered necessary and reasonable to impose a planning condition at this outline stage to set out the need for the applicant to complete further archaeological investigation prior to any house building commencing and the Council's archaeologist has raised no objections to the proposal on this basis.

9.7 Neighbouring Amenity and Amenity of Future Occupiers: WCS Policy CP57 sets out within criteria vii for development to have "*regard to the compatibility of adjoining buildings and uses, the impact on the amenities of existing occupants, and ensuring that appropriate levels of amenity are achievable within the development itself, including the consideration of privacy, overshadowing, vibration, and pollution (e.g. light intrusion, noise, smoke, fumes, effluent, waste or litter)*".

NPPF paragraph 135 Criterion f) meanwhile requires the creation of *"places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users"*.

As this application is outline with all matters reserved, the layout, scale and appearance are not matters for determination at this stage but would be material to any future reserved matter submission(s). Whilst this outline has been submitted with an indicative layout, this is purely for illustrative purposes only to demonstrate how the site could be layout out predicated on the site constraints and opportunities.

The Council's adopted Design Guide sets out a series of design requirements that any subsequent Reserved Matters application would need to be informed by. This includes planning for a minimum back-to-back separation distance of 21m between dwellings and as a minimum, having garden areas for all dwellings being at least equal to the size of the house footprint or 50sqm (whichever is greater).

WDG Paragraph 9.2.2 stipulates the following garden depths, which a future layout would need to be informed by:

- *In general, a north facing garden for a typical 2 storey house should be minimum of 12m long or up to 15m long for a typical 3 storey house.*
- *In general, a south, east or west facing garden should be a minimum of 10m deep.*

The applicants Design and Access Statement and addendum recognise the above and set out a commitment to deliver a WDG complaint development.

The application is supported by a Noise Assessment Report (produced by RSK Acoustics, reference 2061758-RSKA-RP-001-(03)) which has established the baseline noise levels across the site including noise

monitoring from a football match at the Melksham Town Football Club. The report concludes that there would be a negligible noise impact on future occupiers of dwellings situated close to Eastern Way being subject to a slightly elevated noise level that would likely exceed the nighttime noise criteria, which would need to be factored into the finalised layout and detailed house designs and be secured by planning condition.

The Council's public protection department were consulted on this application and raised no objections subject to conditions requiring the submission of a Construction Management Plan and acoustic design scheme. No concerns with respect to land contamination have been raised.

It is noted that the Council's public protection department has included a restriction to the noise levels attributed to the community centre and to also restrict the hours of use of this facility. However, it is not considered reasonable at this stage to impose such conditions at this stage. This may be necessary at REM stage when any fixed community use would be detailed.

9.8 Ecology Matters: WCS CP50 requires development proposals to *"demonstrate how they protect features of nature conservation and geological value as part of the design rationale"* and requires all proposals to *"incorporate appropriate measures to avoid and reduce disturbance of sensitive wildlife species and habitats throughout the lifetime of the development"*.

Improving biodiversity is enshrined within the environmental objective contained within paragraph 8c of the NPPF for achieving sustainable development. The NPPF also requires net gain for biodiversity to be provided including by *"establishing coherent ecological networks that are more resilient to current and future pressures"* as set out within paragraph 187d.

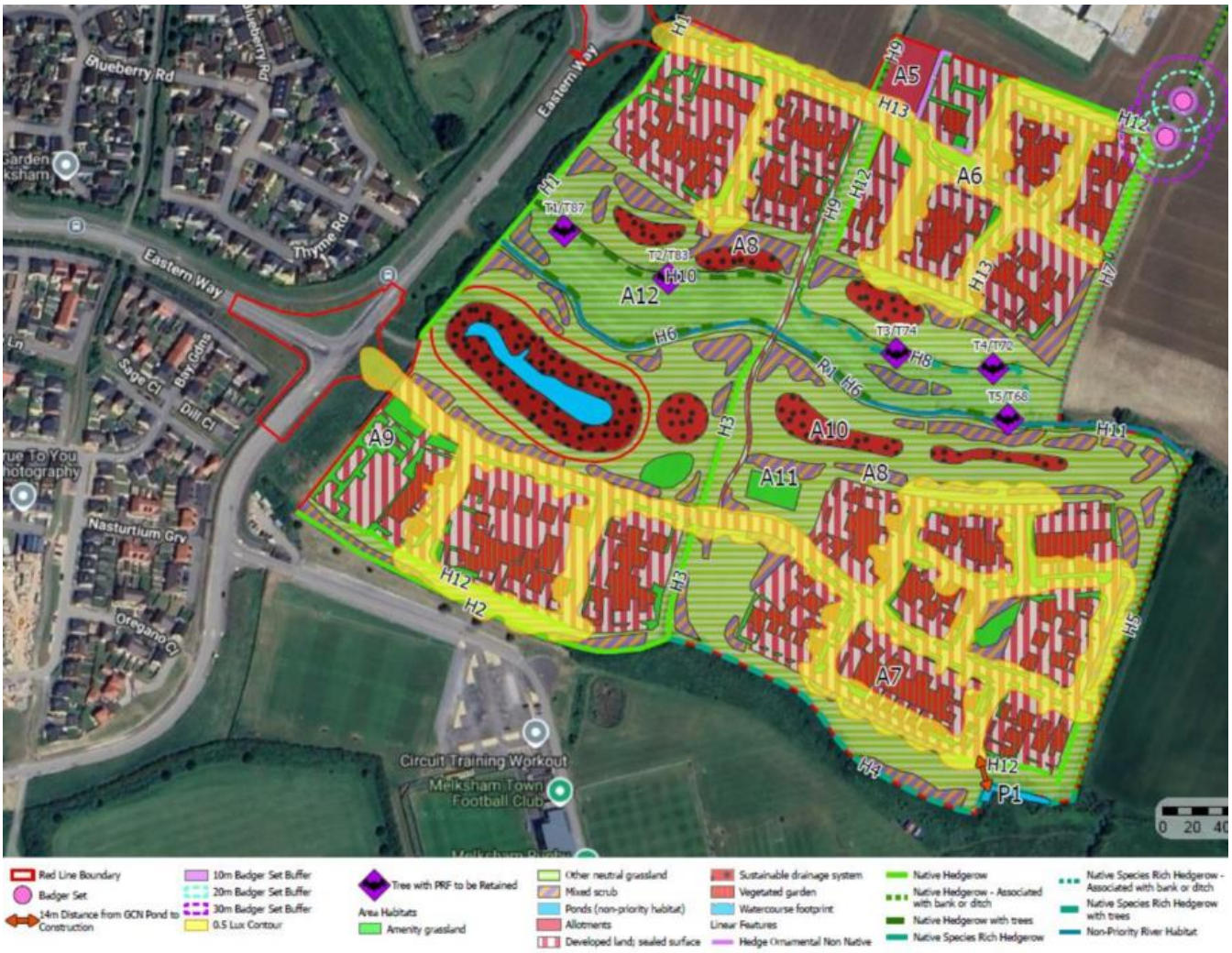
This outline application has been submitted with an Ecological Impact Assessment (produced by Ethos Environmental Planning, reference V1, dated July 2024); a Great Crested Newt Licensed Mitigation Strategy (produced by Ethos Environmental Planning, reference V1, dated March 2025); a Biodiversity Net Gain Plan (produced by Ethos Environmental Planning, reference V1, dated July 2024); a Biodiversity Net Gain Assessment Metric, completed on 19 July 2024; and an Ecological Parameters Plan (produced by Ethos Environmental Planning, dated 15 May 2025).

The Council's ecologist specifically requested the submission of an Ecological Parameters Plan and a Great Crested Newt (GCN) mitigation strategy in order for their holding objection to be removed. Both outstanding documents were submitted in March 2025 and the Council's ecologist has confirmed that their previous objections and requests have been satisfied.

The Council's ecologist noted that the submitted parameters plan has been updated to include larger buffers along the "*eastern and southern boundaries as well as alongside the central north-south hedgerow features… however an Ecological Parameters Plan (EPP) stating the minimum buffer distances along important ecology corridors will be required to secure adherence with these distances at reserved matters stage*" and the EPP must also include the following:

- *Identification of "dark corridors" where lighting will be below 0.5 lux (or no higher than existing), this must include a north-south corridor, east-west corridor, and a suitable buffer around trees with bat roost potential.*
- *Identification of trees with bat roost potential which must be retained and protected from damage and disturbance. The tree numbers provided must align with the arboriculture and ecology reports for easy identification. Note: any trees with bat roost potential which cannot be retained will require further survey to identify their roosting status.*
- *Suitably sized buffers (with minimum distance specified) around sensitive ecology features (e.g., GCN pond and badger sett) where construction activities cannot take place, public access will be prevented, and landscaping will be for the benefit and protection of that ecology feature.*

An extract of the submitted revised EPP is provided below (as received on 22 May 2025), which identifies the key ecological constraints and must be used to inform any future layout proposals:



The submitted Ecological Impact Assessment includes a number of enhancement and mitigation measures for habitats and protected species including the installation of bat and bird boxes, and for existing hedgerows to have a grassland buffer of 10m wide along the eastern and southern site boundaries, and in addition to mixed scrub planting across the development. Such measures must be detailed within a Construction Environmental Management Plan for the site, which shall be secured via a planning condition. A Badger Mitigation Strategy can also be secured via a planning condition.

It is appreciated that four sections of hedgerows (totalling to 62m) would need to be removed to form the proposed access points to each development parcel from Eastern Way and to form the two agricultural accesses to the adjoining fields to the east, but the submitted Ecological Impact Assessment confirms that this would not result in the loss of trees and this loss would be compensated for within the scheme. Section 6.14 of the applicant's Ecological Impact Assessment confirms that the proposal would include 200m of native hedgerow planting, with a 167m section of hedgerow to be planted adjacent to the existing south-western site boundary to create a double hedgerow feature, and a further 122m of hedgerow to be planted adjacent to the existing south-eastern field corner, forming a dark corridor and extra buffer to the GCN breeding pond.

Section 7.1 of the Ecological Impact Assessment also confirms that the existing hedgerows would gain a 10m grassland buffer along the eastern and southern site boundaries, with "*extensive mixed scrub planting across the development site, buffering existing hedgerows to the southern and eastern boundaries, as well*

as centrally" (paragraph 7.1.12).

The proposed tree and scrub planting and enhancements to the existing hedgerows would provide opportunities for nesting and foraging birds, as well as providing mitigation for light-sensitive bat species and dormouse.

With regard to Great Crested Newts (GCN), the applicant's mitigation strategy has been updated to include additional measures to protect GCN during the construction phase, including the use of amphibian exclusion fencing along the southern and eastern boundary. In response, the Council's ecologist has confirmed that the "*strategy also demonstrates that there is sufficient space within the development site to provide suitable habitat for GCN for the lifetime of the development. Underpasses are proposed to ensure habitat connectivity between suitable GCN habitats*".

In terms of Biodiversity Net Gain, which under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) become mandatory in February 2024 and as such this application is required to deliver 10% Biodiversity Net Gain (BNG), the completed statutory metric calculation (dated 19 July 2024) confirms that the proposals would result in a percentage gain of 29.21% for habitat units, a gain of 10.24% for hedgerows and a 58.1% gain for watercourse unit.

In order for the Council to fulfil its BNG monitoring responsibilities, a BNG monitoring contribution would be required and be secured via a legal agreement.

In light of the above, it is considered that subject to the requisite ecology safeguards being imposed by way of planning conditions and securing the necessary future BNG legal agreement to ensure the bat habitat / the natural environment is preserved and enhanced, no ecology-based objection is raised.

9.9 Climate Change: WCS Policy CP41 requires new development to incorporate design measures to reduce energy demand and for major planning applications to be supported by a Sustainable Energy Strategy.

This application is supported by a Sustainability & Energy Statement (produced by Iceni Projects Ltd, dated July 2024), which sets out key sustainability measures for the proposal including using low-impact materials; minimizing water consumption; reducing energy demand; and, utilizing renewable energy options (such as Air Source Heat Pumps (ASHPs) and Photovoltaic (PV) panels).

The Council's climate officer has provided comment on this application and has raised concerns relating the indicative masterplan failing to support the ambition of the submitted Sustainability & Energy Statement. However, as the layout and appearance of the proposal are not yet confirmed and the submitted masterplan would not form part of the approved plan list for this application, this is a matter for a future reserved matters application to address pursuant to setting out the measures/technologies to be used to comply with national and local plan policy on reducing carbon dependency and delivering energy efficiencies.

10. Developer Obligations: WCS Core Policy 3 states that all new development is required *"to provide for necessary on-site and, where appropriate, off-site infrastructure requirements arising from the proposal"* which would be delivered directly by the developer and/or through a financial contribution.

Policy 8 of the made JMNP also requires *"infrastructure requirements, in proportion to their scale and in accordance with prevailing Wiltshire policies, will be delivered through the Community Infrastructure Levy, planning conditions and section 106 agreements"*.

The infrastructure items listed below are those that are relevant to the application site and are required to mitigate the impact of the proposed scheme, in line with the tests set under Paragraph 58 of the NPPF. These are:

a) necessary to make the development acceptable in planning terms.
b) directly related to the development; and
c) fairly and reasonably related in scale and kind to the development.

The following s106 contributions have been identified and have been agreed in writing with the applicant as being CIL regulation compliant (i.e. being reasonable, necessary and directly related to the development) in the event that this outline application is considered acceptable when tested against the NPPF and local plan policy.

Arts Contribution: CP57 paragraph xii promotes "*the use of high standards of building materials, finishes and landscaping, including the provision of street furniture and the integration of art and design in the public realm*".

CP3 'Infrastructure Requirements' (page 58, paragraph 4.42) promotes and defines public art as a type of place-shaping infrastructure and states that the cost of providing infrastructure can be met through the use of planning obligations. In addition, the NPPF recognises that cultural wellbeing is part of achieving sustainable development and includes cultural wellbeing within the twelve core planning principles that underpin both plan-making and decision-taking.

The PPG complements the NPPF and states that "*Public art and sculpture can play an important role in making interesting and exciting places that people enjoy using*."

A contribution of **£90,000** is necessary (based on the Council's current public art charging of £300 per dwelling) to fund a Council-led arts installation to deliver a public art scheme for the site.

Affordable Housing: Section 5 of the NPPF sets out the policies for delivering a sufficient supply of home and includes in paragraph 63 the need "*of establishing need, the size, type and tenure of housing needed for different groups in the community*" including affordable housing. WCS Core

Policy 43 sets out a requirement for 30% on-site Affordable Housing provision, based on the scheme of up to 300 residential units, the on-site affordable housing requirement equates to 90 homes, with the current local needs meriting 54 affordable rented unit, 14 shared ownership units and 22 First Homes units. These dwellings would need to be transferred to a Registered Provider at nil subsidy and the applicant should contact the Council's Housing Team to secure the most up to date requirements prior to the submission of a reserved matters application.

Community Hub: Consistent with the planning arguments made at the SPC meeting in January 2025, which members accepted, new major housing development coming forward on the eastern side of Melksham are expected to make a proportionate contribution towards a new community hub building to be provided on land at Blackmore Farm (as approved in principle by application PL/2023/11188).

A new community hub building has recently been calculated to cost in the region of £1.6 million and in addition to CIL receipts, a dedicated developer contribution for this application has been negotiated. To work out a fair contribution, the referenced cost figure has been divided by the sum total of dwellings planned to be delivered in Melksham as part of the Local Plan Review or is presently known to the Council in the form of live planning applications (totalling 2,160 dwellings), equating to a figure of £740 per dwelling.

Accordingly, for this scheme, the contribution towards the community hub would be **£220,000** (based on £740 x 300 (dwellings).

Education: The Council's education department has confirmed that developer contributions are required towards early years and primary education, with there being no secondary education contribution required.

The calculations that have bene done present a need to fund 36 places for early years, equating to £17,522 (each) **£630,792** and funding 85 new primary school places at £18,758 each equating to **£1,594,430**.

Highways: It is necessary to ensure the proposed development would provide safe, suitable and accessible movement from the site for all users to facilities, services and amenities and the following developer obligations are necessary.

- Bus Service Contribution: **£360,000**
- Green Travel Vouchers: £300 per dwellings **= £90,000**
- Walking and Cycling Infrastructure Network Enhancements: **£87,373**
- LTN 1/20 Compliant junction (possibly zebra) at Heather Avenue/Snowberry Lane - £28,000 to £43,000 + £3000 (crossing assessment - with the costs likely to range between £31,000 to £46,000 [**median = £38,500**]
- Deliver a better alignment of pedestrian only route with zebra crossing at Queensway – 14m x (£250(tarmac)+110(edging)+110(edging)) **= £6,580** (plus mobilisation, legal costs and risk budget)
- Deliver an enhanced crossing facility at Milton Ave./Thackeray Crescent./Ruskin Avenue./Pembroke Rd (possibly a zebra crossing) = median cost of **£38,500** (as per above)
- Enhanced security/visibility at Strattons Walk – circa. **£10,000** (incl. maintenance)
- Widening of pedestrian routes to cycle-route compliance at: Dorset Cre. To Queensway - 115m x (£250+110(one side edging)) = **£41,400**; and Heather Ave. to Dorset Cre. - 82m x (£250+110(one side edging)) = **£29,520**
- Rail Accessibility**: £5,128**
- Cycle Maps: **£1,000**
- Travel Plan Monitoring: **£7,000**

Management Company: The s106 Legal agreement would need to ensure that the proposed dwellings are served by a management company to ensure that the areas of public open space and other shared areas are managed and looked after in perpetuity. The Management Company would also be responsible for maintaining the biodiversity habitat within the application site for the lifetime of the development.

The management company could be the Parish Council or an independent company and the s106 Legal Agreement should be drafted in consultation with Melksham Without Parish Council should they express a commitment to take on the play space or other communal areas within the scheme pursuant to their long-term maintenance and management.

NHS: The proposed development would generate further demand on the local health infrastructure and the NHS Bath and Northeast Somerset, Swindon and Wiltshire Integrated Care Board has confirmed that there is not sufficient existing primary healthcare capacity locally to address the projected new demand generated by the development, with additional floorspace required at Giffords Surgery and the Spa Medical Centre and to part fund this capital project, a developer contribution of **£311,844** is hereby sought towards the capital cost of delivering the additional primary care floorspace:

Table 2 Capital cost calculation of additional primary healthcare infrastructure

Total residential units	Population Generated	Required Floorspace as per HBN 11-01	Delivery Approach	Total Capital Cost
300	690	60sqm	Refurbishment and/or extension of existing premises	£311,844

POS/Play Provision: Based on a "*net gain of 300 dwellings, there is a policy requirement for the developer to provide 10,478.40m² of Public Open Space (POS) and 531.00m² of Equipped Play"*, and the applicant has advised that delivering this provision on site would be achievable.

However, if this provision is not provided on-site, either wholly or partially, it is fully accepted that an off-site financial contribution would be required to replace the on-site requirement, either in its entirety or as a supplement to a partial on-site provision.

In the case of there being no on-site provision, the equivalent off-site financial contribution would be **£359,997.47** for the POS requirement and **£76,464** for the Equipped Play requirement. Target sites in the vicinity of the development for any off-site contributions would be identified at application stage.

The on-site Equipped Play would need to be provided as per the Wiltshire Council Play Specification. All on-site POS and Equipped Play needs to be secured and managed in perpetuity. It should be noted that Wiltshire Council would not look to adopt the on-site POS or Equipped Play.

Officers are fully aware that the Parish Council have expressed an interest in adopting new on-site areas play within its parish and that they would be keen to be part of any s106 drafting engagement with the Council and developers should this application be endorsed as a conditional approval.

The development would also generate a requirement for 708m² of Sports pitches & courts, which equates to an off-site financial contribution **of £70,800**. A target site would be identified by the Council's Leisure Strategy Infrastructure Officer as part of the s106 drafting in the vicinity of the development.

Right of Way: Policy CP52 of the adopted WCS states that development "*shall make provision for the retention and enhancement of Wiltshire's Green Infrastructure network and shall ensure that suitable links to the network are provided and maintained*". This is also confirmed in Saved Policy CR1 of the Leisure and Recreation DPD and the Local Cycling and Walking Infrastructure Plan, which is nearing adoption. Paragraph 105 of the NPPF also requires planning decisions to "*protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users*".

The Council's RoW team seek a developer contribution of **£41,877.20** to improve PRoWs in the local vicinity including MELKW23, MELW22 and MELW41, and to enhance the route to the town centre.

S106 Monitoring Fee: A s106 monitoring fee would be required to be included within the s106 Legal Agreement, which would be 1% of the total financial contributions, **capped at £10,000**.

Waste: Under Policy CP3 of the adopted WCS and WCS6 of the Waste Core Strategy, contributions towards the provision of waste and recycling containers for each residential unit (at £101 per dwelling) are required, totalling **£30,300** for 300 dwellings.

11. PLANNING BALANCE & CONCLUSION

NPPF Paragraph 11(d) and footnote 8 state that when a Council cannot demonstrate a five-year housing land supply then, for applications including housing provision, the policies which are most important for determining the application should be considered 'out-of-date'.

As a result, the presumption in favour of sustainable development (often referred to as the 'tilted balance') should be applied and permission should be granted unless protection policies set out in footnote 7 of the NPPF apply, or the adverse impacts of granting permission would significantly and demonstrably outweigh the benefits.

Paragraph 14 of the NPPF states that in situations where the presumption (at paragraph 11(d)) applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts

with a neighbourhood plan is likely to significantly and demonstrably outweigh the benefits should be refused.

Whilst the made Joint Melksham Neighbourhood Plan is less than 5 years old ('made' in July 2021), with a revised neighbourhood plan scheduled for referendum on 31 July and both deserve significant weight in the planning balance, it remains the case that the Council cannot demonstrate a 5-year supply of deliverable housing sites for the County and after negotiating this application and securing a suite of revisions and developer commitments, this application is supported by officers in light of there being no substantive technical reasons to refuse outline planning permission and in the absence of any adverse impacts significantly and demonstrably outweighing the benefits of delivering a significant quantum of housing at a time when the Council can only demonstrate delivering 2.42 years supply when tested against the 5-year requirement*, "and when assessed against the policies in the framework taken as a whole*".

In this instance, whilst there is conflict with the made and emerging JMNPs and the adopted WCS, the benefits associated with the proposed development would significantly outweigh the harm caused by the in-principle conflict with the neighbourhood plans and the restrictive housing delivery policies contained with the 2015 WCS – which is out of date when tested against the NPPF.

As such, paragraph 11d fully applies and the presumption in favour of sustainable development therefore tilts towards a positive recommendation.

The application proposal for up to 300 additional homes would deliver multiple benefits through the provision of 210 open market properties and 90 affordable homes which is a key part of national and local planning policy and has recently been re-enforced by the Written Ministerial Statement and would contribute meaningfully towards addressing the Councils housing shortfall and meeting affordable housing needs, which merits being afforded **very significant weight**.

The site is an accessible location with good access to public transport links. This also merits **very significant weight** in the planning balance.

The site would also generate short term economic benefits and support jobs during construction and long-term economic benefits from the expenditure on local goods and services by the future residents alongside CIL which also deserves **significant weight**.

The developers s106 and CIL burdens merits **moderate weight.**

The provision of public open space, play area and public rights of way improvements would provide some benefit to existing residents in the wider area and merits being afforded **moderate weight.**

Turning to the adverse impacts, the proposal fails to comply with the development plan as a whole given the policy conflict with CP1, CP2 and CP15 of the Wiltshire Core Strategy, and Policy 6 of the Neighbourhood Plan. By reason of the site being located outside the limits of development the conflict with these policies cannot be afforded full weight by virtue of the housing land supply deficit, but the Plan conflicts nevertheless are significant, but the stated Plan conflict is not considered sufficient to outweigh the aforementioned public benefits.

The housing development would result in the loss of some best and most versatile agricultural land, which is a natural capital asset. However, the development does not trigger a statutory consultation with Natural England due to the size of the site being below the BMV consultation threshold (of 20 hectares) and with the majority of the site falling under 3b classification being land of moderate agricultural quality and capable of producing moderate yields principally cereals and grass. There is some 3a classified agricultural land which is referenced as good quality land capable of producing moderate to high yields of a narrow range of arable crops. There would be **moderate harm** through the loss of the land designated as 3b land, but this must be weighed against the wider public benefits that would include delivering significant housing on-site and land drainage benefits and greenfield run-off betterment to be secured through the housing application proposal

The development would also result in some harm to landscape character (through the development of a greenfield site), but the harm would be localised and would not significantly and demonstrably outweigh the benefits of delivering up to 300 homes at this site, and as such only **limited weight** can be afforded to this stated harm.

The Council has a very significant housing supply deficit and the additional housing to come forward as part of the advancing Melksham Neighbourhood Plan will not on its own, resolve the land supply. **Significant weight** can be afforded to the conflict with the Neighbourhood Plan (in recognition of its status). However, at the time of reporting this application to the members of the Strategic Planning Committee, as a result of the changes made by the Government to the way housing need is calculated in late 2024, Wiltshire Council is unable to demonstrate a five-year supply of deliverable housing sites, and as demonstrated through this report, the adverse impacts of allowing the residential development would not significantly and demonstrably outweigh the benefits of the proposal when assessed against the policies in the NPPF when taken as a whole. The proposal therefore benefits from the presumption in favour of sustainable development which represents a very significant material consideration that steers the decision maker towards granting outline planning permission subject to a s106 and planning conditions.

RECOMMENDATION: To defer and delegate to the head of Development Management to grant outline planning permission subject to the prior completion of a Section 106 legal agreement to cover the contributions identified in Section 10 of this report, and subject to the following planning conditions set out below:

1. The development hereby permitted shall be begun either before the expiration of three years from the date of this permission, or before the expiration of two years from the date of approval of the last of the reserved matters to be approved, whichever is the later.

REASON: To comply with the provisions of Section 92 of the Town and Country Planning Act 1990 as amended by the Planning and Compulsory Purchase Act 2004.

2. Application(s) for the approval of all reserved matters specified in Condition 3 shall be made to the Local Planning Authority before the expiration of two years from the date of this permission.

REASON: To comply with the provisions of Section 92 of the Town and Country Planning Act 1990.

3. No application for reserved matters shall be submitted until there has been first submitted to and approved in writing by the Local Planning Authority a detailed Phasing Plan and order of delivery schedule for the entire application site indicating geographical phases for the entire development.

Where relevant these phases shall form the basis for the reserved matters applications, and each phase shall include within it the defined areas and the quantities of open market and affordable housing as well as the community, POS and on-site play provision uses and associated infrastructure relevant to any given phase.

The 'order of delivery schedule' shall also specify the order in which each land parcel shall commence.

In addition, detailed plans and an order of delivery schedule for 'non-phase specific' landscape and ecology mitigation measures shall be submitted to and approved in writing by the local planning authority.

The development shall be carried out in strict accordance with the provisions of the approved phasing plan and/or any subsequent amendment to the phasing plan that has been agreed in writing by the Local Planning

Authority.

REASON: To ensure the proper planning and delivery of the development and to deliver a sustainable development which is in character with its surroundings and in accordance with the terms of the application.

4. No development shall commence on site until details of the following matters (in respect of which approval is expressly reserved) have been submitted to, and approved in writing by, the Local Planning Authority:

a) The scale of the development.
b) The layout of the development.
c) The external appearance of the development.
d) The landscaping of the site.

The development shall be carried out in accordance with the approved details.

REASON: The application was made for outline planning permission and is granted to comply with the provisions of Section 92 of the Town and Country Planning Act 1990 and Article 3(1) of the Town and Country Planning (General Development Procedure) Order 1995.

5. The development hereby permitted shall be carried out in a phased manner in accordance with the following approved plans and documents:

Dwg 05d, Location Plan, received on 22 May 2025.
Dwg AI14h, Development Parameters Plan, received on 22 May 2025.
Dwg 18507-03-1 Rev C, Proposed Roundabout Site Access and Crossing Works (North Access), received on 22 July 2025.
Dwg 18507-06, Proposed Roundabout Site Access (South Access), received on 22 May 2025
Dwg 18507-03-3 Rev A, Proposed Toucan Crossing, received on 4 September 2024.
Ecological Impact Assessment (Produced by Ethos, issue V1, dated July 2024).
Great Crested Newt Licensed Mitigation Strategy (Produced by Ethos, issue V1, dated March 2025).
Ecological Parameters Plan (Produced by Ethos, dated 15 May 2025).
Tree Retention and Removal Plans (produce by EDP, reference edp8111_d002b (Overview and Sheets 1-4)

REASON: For the avoidance of doubt and in the interests of proper planning and for the protection, mitigation and enhancement of biodiversity.

6. The subsequent reserved matters application(s) (phased or otherwise) to be submitted pursuant to Condition 4 shall accord with the principles, objective and parameters set out in the Design and Access Statement Addendum (produced by Catesby Estates, Rev C, dated 6 March 2025) to ensure a high standard of design and placemaking is achieved at detailed design stage.

REASON: To ensure high-quality placemaking, satisfactory design and residential amenity.

7. The subsequent reserved matters applications (phased or otherwise) shall make appropriate provision for the following:

- Plan to deliver a contiguous carriageway network to reduce the need for large vehicle turning areas.
- Provide refuse collection vehicle tracking and walking distances to collection points.
- Provide full details of pedestrian realm infrastructure and the means to identify priority and continuity across side roads and where routes cross the spine road.
- Provide full details of Public Rights of Way treatment, including construction and surfacing materials where appropriate and any diversions/stopping up.
- Provide an access and movement plan illustrating dedicated walking and cycling routes, construction, geometry and connectivity with external networks.
- Provide full details of Shared Surface streets and transitions, including geometry details and material treatment.
- Provide full details for the on street landscaping.
- Provide details on speed restraint measures to reduce on-site traffic speeds to 20mph or lower.

With the aforesaid requirements for any given phase to be submitted to and approved in writing by the Local Planning Authority before any on site works commence. Following receipt of written approval, the works shall be delivered in full accordance with the phasing plan and shall be maintained as such thereafter.

REASON: To ensure the site is designed and delivered to maximise and prioritise sustainable modes of transport.

8. A detailed housing mix strategy, including the number and size of dwelling units shall be submitted as part of the reserved matters application(s) (phased or otherwise). The development shall be carried out in accordance with the approved housing mix.

REASON: The matter is required to be agreed with the Local Planning Authority in order that the development is undertaken in an acceptable manner and to ensure that the proposed development provides a diverse and balanced range of housing types and sizes, contributing to the creation of a sustainable and inclusive community, in accordance with local planning policies and housing needs.

9. A final Sustainable Energy Strategy shall be submitted as part of the reserved matters application(s) for the housing development to provide details of operational energy, embodied carbon, climate change adaptation measures, low-carbon and renewable energy technologies, water efficiency, electric vehicle charging points, cycle parking, and sustainable transport for the written approval of the Local Planning Authority. The development shall be carried out in accordance with the approved details.

REASON: In order that the development is undertaken in an acceptable manner and in response to climate change.

10. No site clearance, preparatory work or development shall take place until an Arboricultural Impact Assessment incorporating a Tree Constraints Plan, Tree Protection Plan and Arboricultural Method Statement prepared in accordance with BS5837:2012, has been submitted to and approved in writing by the local planning authority as part of the first reserved matters application and then submitted with each subsequent reserved matters application, to demonstrate the protection of all trees and hedgerows and the appropriate working methods and materials used for construction. The development shall then be carried out in accordance with the details approved by the Local Planning Authority.

REASON: In order that the development is undertaken in an acceptable manner, to ensure the retention and

protection of existing trees and hedges in the interests of visual amenity and ecology.

11. No development shall commence on site until:

a) A Written Programme of archaeological investigations is submitted to, and approved by, the Local Planning Authority. This programme will include archaeological Strip, Map and Record (SMR) excavations covering the locations of evaluation trenches 5, 6, 7, 8 and 9 in Field 1(field numbers as defined by the evaluation report of January 2025) and trenches 33, 35, 36, 43, 44, 45, 50, 51, 53, 55, 56 and 57 in Field 4, as well as an open area excavation site in Field 2, covering locations of evaluation trenches 19, 20, 22, 24, 26, 27, 28, 29 and 30. The written programme should include all on-site work and off-site work, including the analysis, publishing and archiving of the results; and
b) The approved programme of archaeological work has been carried out in accordance with the approved details between the calendar months of April and September.

REASON: To enable the recording of any matters of archaeological interest.

NOTE: The excavations and required works are to be undertaken by qualified archaeologists following the standards and guidelines for Sites and Monuments Records and open area excavations, as set out by the Chartered Institute for Archaeologists (CIfA). The costs of the work are to be borne by the applicant.

12. No development shall commence on site until a detailed drainage strategy for the site, incorporating sustainable drainage details, has been submitted to and approved in writing by the Local Planning Authority and detailing the following matters.

- Evidencing how the surface water disposal hierarchy has been applied and how all other options have been exhausted.
- Providing drainage calculations which demonstrate that the required 30% betterment against greenfield rates has been achieved for all storm events between the 1 in 1 year and the 1 in 100-year return period storm events. Large attenuation features shall achieve a minimum of 300mm freeboard above the 1 in 100 year + 45% climate change water level.
- Confirmation that there is sufficient attenuation on site to fully attenuate the 1 in 100 years plus climate change storm event.
- Full labelled drawings for the proposed drainage layout, including layout plans to show the pipe network and attenuation ponds, which should correspond with the drainage calculations.
- Cross sections and design details for all attenuation ponds and their components.
- Confirmation that all development and SuDs attenuation areas are located outside the current and future flood extents.
- Confirming the arrangements for ownership and ongoing maintenance of SuDS over the lifetime of the development.
- Construction phasing plan

The development shall then be carried out in accordance with the approved details.

No housing shall not be first occupied until surface water drainage has been constructed in accordance with the approved scheme.

REASON: To ensure that the development can be adequately drained.

NOTE: All proposals should be designed in accordance with National Standards for SuDS and the latest CIRIA SuDS Manual (C753).

13. No development shall commence on site until a scheme to dispose of foul drainage, including connection to the public foul sewer network, has been submitted to, and approved in writing by the local planning authority. The scheme shall be implemented in accordance with the approved details.

REASON: To ensure that the proposed development does not pose an unacceptable risk to the water environment.

14. No development shall commence on site (including any works of demolition), until a Construction Management Plan (CMP), has been submitted to and approved in writing by the local planning authority. The plan shall include details of the measures that will be taken to reduce and manage the emission of noise, vibration and dust during the demolition and/or construction phase of the development. It shall include details of the following:

i. The movement of construction vehicles;
ii. The parking of vehicles of site operatives and visitors;
iii. The cutting or other processing of building materials on site;
iv. Wheel washing and vehicle wash down facilities;
v. The transportation and storage of waste and building materials;
vi. The storage of plant and materials used in constructing the development;
vii. The erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate;
viii. Measures to control the emission of dust and dirt during construction;
ix. A scheme for recycling/disposing of waste resulting from demolition and construction works;
x. Measures for the protection of the natural environment;
xi. Pre-condition photo survey of local roads and highway infrastructure;
xii. Large Vehicle Routing plan;
xiii. Traffic Management Plan (including signage drawing(s));
xiv. Number (daily/weekly) and size of delivery vehicles;
xv. Number of staff vehicle movements;
xvi. Details of temporary/permanent Traffic Regulation Orders;
xvii. Construction phasing plan;
xviii. The recycling of waste materials (if any);
xix. The loading and unloading of equipment and materials;
xx. The location and use of generators and temporary site accommodation;
xxi. Where piling is required this must be continuous flight auger piling wherever practicable to minimise impacts;
xxii. Hours of construction, including deliveries;
xxiii. Hours of Operation (8am to 6pm Mon – Fri, 8am – 1pm Sat, no working on Sundays or Bank Holidays)

The approved Statement shall be adhered to throughout the construction period. The development shall not be carried out otherwise than in accordance with the approved construction method statement without the prior written permission of the Local Planning Authority.

REASON: To minimise detrimental effects to the neighbouring amenities, the amenities of the area in general, detriment to the natural environment through the risks of pollution and dangers to highway safety, during the construction phase.

15. No development shall commence on site, including demolition, ground works/excavation, site clearance, vegetation clearance and boundary treatment works, until a Construction and Environmental Management Plan (CEMP) has been submitted to and approved in writing by the local planning authority. The CEMP shall include details of the avoidance, mitigation and protective measures to be implemented before and during the construction phase, including but not necessarily limited to the following, and the development shall be carried out in strict accordance with the approved CEMP:

a. Identification of ecological protection areas/buffer zones and tree root protection areas and details of physical means of protection, e.g. exclusion fencing;
b. Working method statements for protected/priority species, such as bats, nesting birds, riparian mammals and reptiles;
c. Mitigation strategies for great crested newts and badger - this should comprise the preconstruction/construction related elements of strategies only;
d. Work schedules for activities with specific timing requirements in order to avoid/reduce potential harm to ecological receptors; including details of when a licensed ecologist and/or ecological clerk of works (ECoW) shall be present on site;
e. No external night-time works or use of artificial lighting during the construction phase;
f. Pollution prevention measures including the location of site and storage compounds, the use of plant and machinery, measures to control of dust and noise, the location and use of wheel washing and vehicle washdown plant/machinery, and the location and use of oils/chemicals;
g. Key personnel, responsibilities and contact details (including Site Manager and ecologist/ECoW).

Construction hours shall be limited to 0800 to 1800 hrs Monday to Friday, 0800 to 1300 hrs Saturday and no working on Sundays or Bank Holidays.

REASON: To ensure appropriate levels of amenity are achievable and to ensure adequate protection and mitigation for ecological receptors prior to and during construction, and that works are undertaken in line with current best practice and industry standards and are supervised by a suitably licensed and competent professional ecological consultant where applicable.

16. No site clearance or development shall commence on site until a Landscape and Ecology Management Plan (LEMP) has been submitted to and approved in writing by the Local Planning Authority. The LEMP shall include:

i. An Ecological Enhancement Plan showing:
    a. The location, number and type of features for wildlife in accordance with Paragraph 7.2.1 of the Ecological Impact Assessment.
    b. Locations of fence gaps for hedgehogs.
    c. The location, type and extent of exclusion measures (e.g. fencing) to protect sensitive ecological features i.e., great crested newt breeding pond.
    d. Identification of the habitats to be created/enhanced and managed specifically for the benefit of target species i.e. great crested newt.
ii. Long term objectives and targets, management responsibilities and maintenance schedules for each ecological feature shown on the Ecological Enhancement Plan.

iii. The mechanism for monitoring success of the management prescriptions and a procedure for review and necessary adaptive management in order to attain targets.
iv. Details of the mechanism(s) by which long-term implementation of the plan will be secured.

The LEMP shall be implemented in full and for the lifetime of the development in accordance with the approved details.

REASON: To ensure the long-term management of landscape and ecological features retained and created by the development for the benefit of visual amenity and biodiversity for the lifetime of the scheme.

17. No site clearance or development shall commence on site until a Habitat Management and Monitoring Plan (the HMMP), prepared in accordance with the statutory Biodiversity Gain Plan and including:

1. A non-technical summary;
2. The roles and responsibilities of the people or organisation(s) delivering the HMMP;
3. The planned habitat creation and enhancement works to create or improve habitat to achieve the biodiversity net gain in accordance with the statutory Biodiversity Gain Plan and schedule for implementation;
4. The management measures to maintain habitat in accordance with the statutory Biodiversity Gain Plan for a period of 30 years from the completion of development; and
5. The monitoring methodology and specification of a Monitoring Pack (to include but not exclusively up to date Management Actions Logs, Habitat Condition Assessment Reports, metric calculation, and corresponding post-intervention Habitat Map), which shall be submitted to the Local Planning Authority in years 2 (two) 5 (five) 10 (ten) 15 (fifteen) 20 (twenty) and 30 (thirty) of the Maintenance Period, has been submitted to, and approved in writing by, the local planning authority.

No more than 50% of units shall be occupied until the habitat creation and enhancement works set out in the approved HMMP have been implemented.

The created and/or enhanced habitat shall be managed and maintained in accordance with the statutory HMMP at all times thereafter.

REASON: To ensure the development delivers a biodiversity net gain on site in accordance with Schedule 7A of the Town and Country Planning Act 1990.

18. Notwithstanding the submitted details, no works shall commence (except for site enabling or site clearance operations) on site until full construction details for the northern access have been submitted to and approved by the Local Planning Authority.

The construction details shall take into consideration of planned and delivered pedestrian infrastructure in the vicinity of the junction, including necessary carriageway surface treatments, and shall incorporate details of and an uncontrolled LTN 1/20 compliant crossing of the development arm of the roundabout. The full construction details shall be subject of a Stage 2 Road Safety Audit.

Prior to first occupation of any dwelling served from the northern access, the northern access shall be completed in all respects in accordance with the approved details and maintained as such thereafter.

REASON: To ensure that a safe and sufficient access strategy is provided.

19. Notwithstanding the submitted details, no works shall commence (except for site enabling or site clearance operations) on site until full construction details for the southern access facilities have been submitted to and approved by the Local Planning Authority. The construction details shall include details of an uncontrolled LTN 1/20 compliant crossing of the development arm of the roundabout. The full construction details shall be subject of a Stage 2 Road Safety Audit. Prior to first occupation of any dwelling served from the southern access, the southern access shall be completed in all respects in accordance with the approved details and maintained as such thereafter.

REASON: To ensure that a safe and sufficient access strategy is provided.

20. No development shall commence above ground floor slab level until a scheme for water efficiency has been submitted to and approved in writing by the Local Planning Authority. The scheme will demonstrate a standard of a maximum of 110 litres per person per day is applied for all residential development. The scheme shall be implemented in accordance with the agreed details.

REASON: This condition contributes to sustainable development and meeting the demands of climate change. Increased water efficiency for all new developments also enables more growth with the same water resources.

21. No development shall commence above ground floor slab level until full construction details of the proposed toucan crossing and bus stop and shelter provision have been submitted to and approved by the Local Planning Authority. The construction details shall include but not be limited to all necessary surface treatments to accommodate the crossing, shelter and real time information specification and orientation of bus stops to maximise pedestrian crossing visibility.

The full construction details shall be subject of a Stage 2 Road Safety Audit.

Prior to first occupation of any dwelling, the Toucan Crossing and Bus Stop/Shelter provision shall be completed in all respects in accordance with the approved details and maintained as such thereafter.

REASON: To ensure that a safe and sufficient access strategy is provided.

22. No development shall commence above ground floor slab level until full design and construction details of an extension of the existing shared walking and cycling facility along the eastern side of Eastern Way linking the existing facility to the south with Bridleway MELW41 in the north have been submitted to and approved by the Local Planning Authority.

Prior to first occupation of the 150th dwelling, the shared walking and cycling facility shall be provided in all respects in accordance with the approved details and maintained as such thereafter.

REASON: to ensure that the proposed development is accessed by a variety of transport modes of choice, including, walking, cycling and public transport.

23. No development shall commence above ground floor slab level until full details of a hard and soft landscaping has been submitted to and approved in writing by the Local Planning Authority, the details of which shall include: -

- Location and current canopy spread of all existing trees and hedgerows on the land;

- Full details of all existing trees and hedging to be retained, together with measures for their protection during development;
- A detailed planting specification showing all plant species, supply and planting sizes and planting densities
- All means of enclosure;
- Car park layouts;
- Refuse/recycling collection points;
- Bin storage areas;
- Other vehicle and pedestrian access and circulation areas;
- All hard and soft surfacing materials.

REASON: In order that the development is undertaken in an acceptable manner, to ensure a satisfactory landscaped setting for the development and the protection of existing important landscape features.

All soft landscaping comprised in the approved details of landscaping shall be carried out in the first planting and seeding season following the first occupation of the building(s) or the completion of the development whichever is the sooner. All shrubs, trees and hedge planting shall be maintained free from weeds and shall be protected from damage by vermin and stock. Any trees or plants which die, are removed, or become seriously damaged or diseased shall be replaced in the next planting season with others of a similar size and species, unless otherwise agreed in writing by the local planning authority. All hard landscaping shall also be carried out in accordance with the approved details prior to the occupation of any part of the development or in accordance with a programme to be agreed in writing with the Local Planning Authority.

REASON: To ensure a satisfactory landscaped setting for the development and the protection of existing important landscape features.

24. All lighting provided on site shall be in accordance with the appropriate Environmental Zone standards set out by the Institute of Lighting Engineers in their publication GN01:2021, 'Guidance for the Reduction of Obtrusive Light' (ILP, 2021), and Guidance note GN08/23 'Bats and artificial lighting at night', issued by the Bat Conservation Trust and Institution of Lighting Professionals and shall demonstrate that bat habitat (trees with bat roost potential, Clacker's Brook river corridor and hedgerows) on the perimeter of the site shall remain below 0.5 lux (or no higher than existing).

REASON: In the interests of the amenities of the area and to minimise impacts on biodiversity caused by light spillage to areas above and outside the development site.

25. The Reserved Matters application(s) (phased or otherwise) shall be accompanied by an updated mitigation strategy For Great Crested Newt and Badger. The mitigation strategies shall be informed by up-to-date surveys where required.

REASON: To ensure adequate protection and mitigation for Great Crested Newt and Badger.

26. An acoustic design scheme for protecting the proposed dwellings from external (traffic/railway/aircraft) noise shall be submitted to and approved in writing by the local planning authority at reserved matters stage. The scheme shall ensure that, upon completion of the development, the following noise criteria shall be met, with windows open, in accordance with the Professional Practice Guidance: Planning and Noise - New Residential Development (May 2017) (or any subsequent modification):

A. bedrooms shall achieve an 8-hour LAeq (23:00 to 07:00) of 30dB(A) and an LAmax, F of 45 dB
B. living rooms and dining rooms shall achieve a 16 – hour LAeq (07:00 to 23:00) of 35dB(A)
C. external amenity spaces shall achieve a 16 – hour LAeq (07:00 to 23:00) of 55dB(A)

The details as approved shall be implemented prior to occupation of the development and thereafter be permanently retained. For the avoidance of doubt, using closed windows to achieve the internal noise level target shall only be considered once all other good acoustic design acoustic mitigation measures have been utilised.

REASON: In the interests of residential amenity.

INFORMATIVES TO APPLICANT:

1. This permission shall be read in conjunction with an Agreement made under Section 106 of the Town and Country Planning Act, 1990 and dated the [INSERT TO BE ADDED ONCE S106 IS SEALED AT LATER DATE].

2. The applicant is advised that the development hereby approved represents chargeable development under the Community Infrastructure Levy Regulations 2010 (as amended) and Wiltshire Council's CIL Charging Schedule. If the development is determined to be liable for CIL, a Liability Notice will be issued notifying you of the amount of CIL payment due. If an Additional Information Form has not already been submitted, please submit it now so that we can determine the CIL liability. In addition, you may be able to claim exemption or relief, in which case, please submit the relevant form so that we can determine your eligibility. The CIL Commencement Notice and Assumption of Liability must be submitted to Wiltshire Council prior to commencement of development. Should development commence prior to the CIL Liability Notice being issued by the local planning authority, any CIL exemption or relief will not apply, and full payment will be required in full and with immediate effect. Should you require further information or to download the CIL forms please refer to the Council's Website: Community Infrastructure Levy - Wiltshire Council.

3. The applicant must obtain Wessex Water's permission for any connections to their infrastructure.

4. An environmental permit is required for any works within 8m of a main river. Consult the Environment Agency's main river map to see if a river/watercourse is designated as a main river. For more guidance on environmental permits, consult the website: Check if you need an environmental permit - GOV.UK.

5. Wiltshire Council is the Lead Local Flood Authority that has the lead responsibility for surface water management, the discharge rate from the site must be agreed with Wiltshire Council as part of agreeing the surface water drainage strategy for the site. Wiltshire Council's land drainage bylaws can be downloaded at: Drainage - Wiltshire Council. The land drainage consent application form and guidance notes can be found on our website at: Land drainage and ordinary watercourse - Wiltshire Council

APPENDIX N - SNARTLON FARM DECISION NOTICE PL/2024/07097

Wiltshire Council

The Town and Country Planning Act 1990

Refusal of Outline Planning Permission (Some Matters Reserved)

Application Reference Number: PL/2024/07097

Decision Date: 05/08/2025

Applicant:	Catesby Estates Promotions Limited Arena Business Centre, First Floor, The Square, Basing View, Basingstoke, United Kingdom, RG21 4EB
Particulars of Development:	Erection of up to 300 dwellings (Class C3); land for local community use or building (incorporating Classes E(b), E(g) and F2(b) and (c)); open space and dedicated play space and service infrastructure and associated works on land South of Snarlton Farm (Outline planning application with all matters reserved except for two pedestrian and vehicle accesses (excluding internal estates roads) from Eastern Way) - Resubmission of PL/2023/07107)
At:	Land South of Snarlton Farm, Snarlton Lane, Melksham, SN12 7QP

In accordance with paragraph 39 of the National Planning Policy Framework (NPPF), this planning application has been processed in a proactive way. However, due to technical objections or the proposal's failure to comply with the development plan and/or the NPPF as a matter of principle, the local planning authority has had no alternative other than to refuse planning permission.

In pursuance of their powers under the above Act, the Council hereby REFUSE TO GRANT PERMISSION for the development referred to in the above application and plans submitted by you, for the following reason(s):

Refusal Reason

1 The development as proposed, would materially conflict with the Council's strategic core policies CP1, CP2 and CP15 of the adopted Wiltshire Core Strategy, as well as significantly and demonstrably conflicting with the Joint Melksham Neighbourhood Plan 2, which allocates other land for housing (as made on 4 August 2025) and that the benefits of the development would not outweigh the

aforesaid Plan conflicts and that the application is hereby refused in full compliance with the National Planning Policy Framework paragraph 14.

2 The application fails to provide and/or secure adequate provision for the necessary on-site and, where appropriate, off-site infrastructure to make the application proposal acceptable in planning terms. The application is therefore contrary to policy CP3 of the adopted Wiltshire Core Strategy, and the National Planning Policy Framework, with regard to the central social and environmental sustainable development objectives enshrined within paragraph 8.

INFORMATIVE TO APPLICANT:

Pursuant to RFR No.2, in the event of an appeal being advanced, it may be possible to address the necessary developer obligations and commitments through a suitably worded s106 Unilateral Undertaking for an appointed planning inspector to review.

Nic Thomas **- Director of Planning, Economy and Regeneration**

APPENDIX O - LIST OF SUGGESTED CONDITIONS

Should this appeal be allowed, the Council would request the following conditions be included on any permission granted:

1. This permission in principle (PIP) shall cease to have effect three year from the date of the Appeal Decision. The Technical Details Consent (TDC) relating to the proposed development must be granted prior to the expiration of the PIP.

2. In accordance with Paragraph: 045 Reference ID: 58-045-20180615 of the Permission in Principle Planning Guidance, the key development considerations at the TDC stage are as follows:

    1) Full plans and elevations of the proposed structure, to a recognised scale
    2) A Design and Access Statement which addresses how any proposed development would:
        i. Respect the established pattern and character of surrounding development; and
        ii. Ensure that an acceptable level of residential amenity would be available to the occupants of the proposed dwellings in terms of amenity space, privacy, outlook and levels of natural light and existing surrounding dwellings in terms of amenity impacts, in accordance with the Council's adopted Wiltshire Design Guide.
        iii. Include a materials specification, with specific sample photos/brochures details
    3) An Agricultural Land Classification Statement which includes robust analysis of the quality of the land and confirms the grading of the site in accordance with Natural England's Agricultural Land Classification.
    4) A Heritage Statement which identifies and assesses all nearby heritage assets and their setting and also sets out the impact the proposed development would have on the significance of such assets.
    5) An Ecological Assessment which robustly establishes the potential of the site for bats and their habitats and the impact the proposal would have on this. The assessment should include any mitigations measures required to avoid adversely impacting bat habitat.
    6) A site plan (to a recognised scale) which identifies the proposed access points and demonstrates suitable levels of visibility, including but not reserved to:
        i. Intervisibility can be provided from the site access, both for vehicles and pedestrians;
        ii. The proposed site plan should also display any pedestrian routes within the site;
        iii. The proposed on-site car parking layout, including the number of parking spaces provided on-site should be provided in accordance with the standards set out in Council's adopted Car Parking Strategy
        iv. The applicant should consider the site's accessibility by sustainable modes of transport and proximity to facilities;
        v. The applicant will be required to provide details of cycle parking;

vi. Details of the refuse collection strategy for the site should be provided. A refuse collection point must be provided which is located in accordance with the maximum carry distances as outlined in the Council' adopted Waste Strategy

7) Details of all new planting, landscaping and boundary treatments to be created, on a landscaping plan drawn to a recognised scale. Enhanced planting would be sought within this rural location to reduce the presence and visual impact of hard boundaries in open countryside
8) A statement of how the development would be of a high quality of sustainable design which includes reference to how the layout, design and construction of the development would involve the efficient use of natural resources through reducing resource requirements in terms of energy demands and water use; the consideration of opportunities for renewable and low carbon energy technologies; the use of passive solar design to maximise the use of the sun's energy for heating and facilitate sustainable cooling of buildings; and the mitigation of flooding, pollution and overheating.

3. The proposed development would likely be liable for Community Infrastructure Levy (CIL). CIL would apply to the development consented through the permission in principle route if a Technical Details Consent has been granted. Charges would become due from the date that a chargeable development is commenced.