

David Lloyd Chippenham Leisure and Health Impact Assessment and Sequential Assessment

**Southpoint Business Park (Plot 100), A350 West Cepen
Way / N4528 Patterdown, Chippenham, SN15 2NU**

David Lloyd Leisure Ltd and Baylis Estates

18 March 2026

LICHFIELDS

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1.0 Introduction

- 1.1 Lichfields have been asked, as part of the proposals for a David Lloyd Club, to prepare a Leisure and Health Impact Assessment and Sequential Assessment in support of the proposals submitted to Wiltshire Council at Southpoint Business Park (Plot 100), A350 West Cepen Way / N4528 Patterdown, Chippenham, SN15 2NU (referred to as ‘the Site’).
- 1.2 The proposals for the health, fitness and racquets club comprise the David Lloyd building and external activity areas. Overall, the facilities include 3 no. weather protected tennis courts, 3 no. padel courts with canopies, 1 no. Multi-use court, 1 no. Battle Box facility, indoor and outdoor swimming pools, 2 court sports hall, gym and studio facilities, spa facilities, child activity area, lounge and food and drink uses, terrace area, together with ancillary facilities, car and cycle parking, servicing, landscaping and associated works.
- 1.3 This document should be read in conjunction with the full planning application documents and drawings submitted to Wiltshire Council, through Lichfields, on behalf of David Lloyd Leisure Ltd and Baylis Estates.
- 1.4 This Leisure and Health Impact Assessment and Sequential Assessment contains 8 sections:
- Section 2 of this Statement provides a brief background into David Lloyd and provides a summary of the Site and surrounding area;
 - Section 3 describes the proposals;
 - Section 4 reviews the relevant national and local planning policy relevant to the Leisure and Health Impact Assessment and Sequential Assessment;
 - Section 5 assesses the suitability, viability and availability of more central locations (the ‘Sequential Assessment’);
 - Section 6 considers the potential leisure impact of the development proposals;
 - Section 7 considers the potential health impact of the development; and
 - Section 8 provides a conclusion to this Statement.

2.0 Background

David Lloyd Leisure Ltd

- 2.1 David Lloyd Leisure Ltd (David Lloyd) is Europe's premier health, racquets and fitness provider. The company has operated for over 40 years and owns 108 David Lloyd clubs in the UK and a further 29 across Europe. David Lloyd has ambitious growth plans in both the UK and Europe.
- 2.2 The business has 810,000 members (640,000 in the UK) and plays an important role in encouraging UK residents to lead active, healthy lifestyles, helping to reduce pressure on public health services.
- 2.3 25% of members are aged under 16, and 50% of all club attendees visit as a family group. There are 44-million-member visits in the UK each year, and the business delivers 800,000 fitness classes annually.
- 2.4 Active children are more likely to grow into active adults. Every week 160,000 classes are delivered across the UK for children aged 3 to 11 years with an attendance of 1.2 million.
- 2.5 Each week 25,500 children learn to swim and 16,000 to play tennis.
- 2.6 Each club is embedded within the local community, providing schools with access to facilities to learn to swim and supporting local charities and good causes. Members benefit from more than a gym or a racquets club; there are spaces to socialize, relax, and spend quality time with their families.
- 2.7 The design of clubs is very intentional, incorporating a wide variety of facilities with a focus on user experience whilst also considering the number of raw materials used in construction and the amount of energy needed during operation.
- 2.8 As well as a comprehensive choice of facilities and group-exercise classes there is a strong focus on creating inclusive communities and supporting emotional wellbeing of members & staff through social activities such as family discos, quiz nights & coffee mornings. Opportunities are created to enjoy shared interests beyond health & fitness (including book & chess clubs); and designating 'happy to chat' tables in clubrooms to encourage interaction.
- 2.9 The COVID-19 pandemic brought into sharp focus the need for both physical and mental resilience and David Lloyd are at the forefront of development, both in fitness innovation across its Clubs, and mindful-wellness through group exercise classes and spas, and its family-focused provision.
- 2.10 David Lloyd Clubs is a significant employer in the health and fitness market, employing over 11,500 people. These include an expert health and fitness team of over 2,000 and more than 680 tennis professionals.
- 2.11 Pay exceeds the national living wage, and staff benefit from a range of employee benefits to help support the work-life balance and wellbeing of team members. These include flexible working, free family membership and access to 40 degree level apprenticeships.

- 2.12 58% of all permanent team members live within a 3-mile radius of their place of work, rising to 73% within a 5-mile radius.
- 2.13 Job roles are varied, with opportunities in Food & Beverage, Kids & Creche, Lifeguarding, Gym & Fitness, Reception, Sales & Administration and Leadership.
- 2.14 Each club supports a further 35 FTE jobs in UK businesses making up David Lloyd Clubs' supply chain.
- 2.15 In 2024 David Lloyd Clubs contributed a total of £2.7 million to support 1,200 different charities. This included £1.5 million raised through club fundraising with 76% benefitting local causes.
- 2.16 The direct economic contribution of this development to the economy is estimated to be £2.7 million annually.
- 2.17 The development proposals, subject to approval, will represent a major investment by David Lloyd within the area, with the creation of approximately 80-100 FTE operational jobs, and circa 50 construction jobs, and the development of a site which is a key part of the wider Chippenham area.

Site and Surrounding Area

- 2.18 The proposed site is located within the administrative boundary of Wiltshire Council and comprises Plot 100 at the proposed Southpoint Business Park, A350 West Cepen Way/B4528 Patterdown Road, Chippenham. The application site extends to approximately 3.33 hectares.
- 2.19 An aerial of the application site (inc. approx. red line boundary) and the surrounding area is shown in Figure 2.1 below.

Figure 2.1 Proposed Site Location



Source: HCD Architects

- 2.20 The boundaries of the Site are defined by:
- To the west by the Chippenham/ Bath/ Bristol main railway line;
 - To the south by the existing A350/West Cepen Way;
 - To the north by an existing mature hedge line, which is anticipated to be retained as part of the employment masterplan; and
 - The eastern boundary is defined as part of the masterplan for the wider Southpoint Business Park by the main 'spine' access route (Showell Avenue) which bisects the employment park. Immediately beyond the access road is the landmark Siemens building, which is currently under construction.
- 2.21 The proposed access will utilise Showell Avenue which is completed and in use as part of the wider masterplan / employment proposals for Southpoint Business Park, adjoining the A350 with the B4528. The Site will be connected to the wider road network via the A350, leading to the A4 and M4.
- 2.22 In regard to public transport accessibility, the nearest existing bus stops to the Site are the Showell Farm bus stops and the Patterdown bus stops located approximately 800m and 1000m from the proposed site access. The wider Southpoint Business Park will provide pedestrian connections to the Patterdown Bus Stops allowing pedestrians to access the X37. The nearest train station to the Site is Chippenham Train Station, approximately 2.5 miles away. As the Site is part of the wider mixed-use site allocation, good quality active travel options will be available to other parts of Chippenham upon completion of the wider scheme.
- 2.23 Following the update to the Environment Agency's Flood Map for Planning in August 2025, a portion of the site (concentrated to the South) now sits within Flood Zones 2 and 3. As the Proposed Development does not include any residential, hotel or medical facilities, it is classed as a 'less vulnerable' use in a flood risk scenario.
- 2.24 Stantec who are the designers for the developer, Baylis Estates, on Southpoint Business Park, have been liaising with the Environment Agency and are designing a flood mitigation strategy to reduce any impacts on the development. The mitigation strategy will include using landscaped areas of the site to store flood waters and divert any flooding into existing water courses at permitted discharge rates. The David Lloyd proposals allow for the flood mitigation areas within the soft landscape boundaries.

Planning History

- 2.25 Based on a review of the Council's online planning register, the planning history that is relevant to the Site is set out below:

Table 2.1 Planning History

Reference	Description of Development	Decision & Date
PL/2025/06414	Discharge of Conditions 2 (Construction Access), 5 (Archaeological Monitoring), 7 (External Lighting), 11 (Highways / Drainage Details), 12 (Loading, Unloading, Parking of Goods Vehicles), and 13 (LEMP) for PL/2024/04872.	Approved 19.12.2025
PL/2025/06416	Discharge of conditions 1, 2, 3, 4, 9, 10, 11, 12 and 14 relating to application PL/2024/04873.	Approved 22.10.2025
PL/2024/04872	Variation of details approved under conditions 4 (maximum heights) and 16 (parameter plan); removal of condition 1 (since the permission has been implemented); the rewording of condition 2 to refer to details approved pursuant to 20/02511/REM (as amended or as varied); removal of condition 15 (since works to the M4 J17 have been completed), and the rewording of conditions 5, 6, 7, 10, 11, 12, 13 and 14 pursuant to approved or part approved details (to reflect changes to consequential plan references or details previously approved via condition); all pursuant to outline consent N/13/00308/OUT	Approved 20.12.2024
PL/2024/04873	Variation of conditions to revise the Landscape Phasing Plan referenced under condition 3; to update the site masterplan referenced under condition 6; and to allow changes to the drawings and documents listed under condition 11; all pursuant to reserved matters approval ref 20/02511/REM	Approved 20.12.2024
20/02511/REM	Application for the approval of reserved matters (on appearance, landscaping, layout and scale) for the delivery of employment development comprising 50,000sqm incorporating Class B1(b), Class B1(c), Class B2 with ancillary B1(a), Class B8 and ancillary B1(a) uses including means of access, car parking, servicing and associated landscaping and works (Pursuant of Outline Application N/13/00308/OUT)	Approved 24.02.2021
N/13/00308/OUT	Outline Planning Application For Employment Development Comprising 50,000sqm Incorporating Class B1(b), Class B1(c), B2 With Ancillary B1(a), B8 & Ancillary B1(a) Uses Including Means of Access, Car Parking, Servicing, Associated Landscaping & Works	Approved 24.03.2017

Source: Wiltshire Council Online Planning Register

2.26 Policy CH1 of the Chippenham Site Allocations Plan includes the Site as part of the South West Chippenham allocation identified for mixed uses including “*18ha of land for employment (B1, B2 and B8 uses of the Use Classes Order) adjacent to the A350*”.

2.27 As part of the employment allocation, Class B1/E(g)(i) uses are to be provided which are classified as main town centre uses. It is noted that there is therefore a need to demonstrate compliance with the sequential test for these uses. As such, it is understood that, as part of the evidence base for this allocation, the Council has already considered in broad terms the sequential positioning of the Site for employment/main town centre uses and concluded that it would be acceptable.

3.0 The Proposed Development

- 3.1 The increase in interest in physical fitness and wellbeing has shifted people's perceptions regarding the importance of exercise and resilience and has contributed towards both an increase in health-consciousness and growth of health and fitness clubs.
- 3.2 David Lloyd prides itself on ensuring it provides the very best service to both members and staff. In 2025, for the third consecutive year, David Lloyd was awarded one of the best companies to work for in the UK as part of Sunday Times 'Top 10 Very Big Companies to work'. This is due to the company's core belief which states David Lloyd will do the right thing by its members, its employees and the communities in which the business operates. David Lloyd further look to provide the best facilities, services and programs, innovative products and unrivalled expertise for its 810,000 members and over 11,500 employees.
- 3.3 The proposed health, fitness and racquets club in Chippenham consists of a new-build David Lloyd Club that will feature a suite of studios and facilities, targeted at all age groups. The proposed development is described as:

"Erection of health, fitness and racquets club, including three outdoor tennis courts within an enclosed air dome structure, three outdoor padel courts enclosed within canopies, indoor and outdoor swimming pools, outdoor multi use court, outdoor battle box exercise facility, external spa garden, child activity area, lounge facilities including a business hub and terrace, together with ancillary facilities, car parking, servicing, landscaping and associated works."

- 3.4 Further detail on the proposals are contained within the submitted plans and Design and Access Statement which accompanies the Planning Application, with the facilities summarised below:

Facilities

- 3.5 David Lloyd is genuinely positioned as a best in class brand in the Health, Racquets, Fitness and Vitality Markets. The Club is proposed to have a wide range of facilities, with a 'Country Club' feel to the development.
- 3.6 The proposed uses and activities are summarised below:
- 1 Tennis Facilities
 - a 3 court permanent air-dome enclosure
 - b 3 padel courts with canopies
 - 2 Sport Facilities
 - a Multi-use court
 - b 1 Battle Box (outdoor exercise / bootcamp) facility
 - 3 Swimming Facilities
 - a 5 lane, 20m internal pool
 - b 400/800mm deep learner pool
 - c 4 lane, 25m outdoor pool

- d Outdoor children's pool
 - e Swim in/out pool (connecting internal and external spa areas)
- 4 Health and fitness Facilities
 - a 2 court sports hall
 - b 120 - 140 station gym
 - c 4 studio spaces - rhythm and cyclone, blaze, high energy, mind & body studios
 - d Children's soft play and activity space
- 5 Spa Facilities
 - a Internal spa –pool, relax, sauna and steam
 - b External spa garden –pool, sauna and relax
- 6 Leisure Facilities
 - a Lounge including adult lounge/business hub
 - b External lounge terrace
- 7 Ancillary Facilities
 - a Reception, changing, staff, catering kitchen/cafe bar
- 8 External Facilities
 - a Terrace area
 - b Car parking spaces including disabled, parent & child and active and passive EV charger bays
 - c Covered cycle spaces
 - d Delivery area

Accessibility and Parking

- 3.7 The development will be served by 277 car parking spaces, including:
 - 10 disabled;
 - 5 parent and child;
 - 28 EV charger bays; and
 - 28 future provisional EV spaces
- 3.8 Parent and child, and disabled parking, are situated adjacent to the main entrance of the building, providing ease of access.
- 3.9 30 cycle spaces are proposed to the north of the main entrance. The covered cycle parking is located adjacent to a clearly defined pedestrian route, that leads to the main building entrance.

Format and Scale

- 3.10 The new health, fitness and racquets club will provide a premium facility that delivers a range of active and leisure pursuits for the whole community. David Lloyd buildings have been refined over time to ensure the building operates in an economically, environmentally and socially efficient way. For that reason there is limited flexibility in the format under David Lloyd's business model.

Approach to Sequential Test

- 3.11 As can be seen above, David Lloyd's modern clubs follow an efficient format of provision, with tennis courts, main club buildings and facilities defining a significant area which includes open areas of sports and recreational space around the principal building, surrounded by car parking and landscaping.
- 3.12 Therefore, whilst there is some limited flexibility in the David Lloyd model, there are a number of key parameters around the requirement for external tennis courts, parking, landscaping, and facilities which drive the need for an extensive site.
- 3.13 Without such key elements, the business format of a David Lloyd club would not be achieved.
- 3.14 The area of search for sequential assessments is dependent on the type and amount of development proposed and the market that development intends to serve. To that end, the search area is generally confined around the area of Chippenham and the market towns of Calne, Corsham and Melksham.
- 3.15 The search has also been refined by existing David Lloyd clubs in Bristol Emersons Green, Swindon and Gloucester which would suggest a decision to locate in these town centres and wider areas unlikely.
- 3.16 For a site to be appropriate / a sequentially preferable site, it should meet the following tests:
- An accessible location to serve the appropriate catchment;
 - A site of at least 2 hectares (5 acres) to facilitate the whole development; and
 - A location with customer access at ground floor level.
- 3.17 The sequential assessment is driven by these assumptions and has been considered alongside David Lloyd as proposed developers and end user / operators of the Club.

4.0 **Planning Policy Context**

4.1 In this section, we set out the key planning policies relevant to the consideration of the Leisure and Health Impact Assessment and Sequential Assessment.

Adopted Planning Policy

4.2 For the purposes of Section 38(6) of the Act, the Development Plan for the Site comprises:

- 1 Wiltshire Core Strategy, adopted January 2015;
- 2 Chippenham Site Allocation Plan, adopted May 2017;
- 3 Chippenham Neighbourhood Plan 2023-2038, made May 2024; and
- 4 Wiltshire and Swindon Waste Core Strategy 2006-2026, adopted July 2009.

4.3 The National Planning Policy Framework (NPPF) (2024) and Sport England - Planning for Sport Guidance (2019) are also material considerations in the determination of the planning application and are relevant to this Assessment.

4.4 To note, the Government is currently consulting on a revised National Planning Policy Framework (NPPF) and other changes to the planning system, many of which are focused on making national policy and guidance more delivery and growth focused. The consultation commenced on 16th December 2025 and closes on 10th March 2026.

4.5 The wider development plan policy context including other material considerations and detailed planning policy is set out in the supporting Planning Statement.

Emerging Planning Policy

4.6 Wiltshire Council submitted the Wiltshire Local Plan to the Secretary of State for Housing Communities and Local Government for independent examination on 28 November 2024. The first stage of hearings has been completed, and the second stage commenced on 11 November 2025.

4.7 A letter from the Inspectors' leading the Examination was issued to the Council in December 2025 which set out the further work needed before the Local Plan could move forward. The Council have since responded in late January 2026, confirming that the necessary resources and governance have been put in place to complete this work as quickly as possible. Following an anticipated consultation on proposed main modifications to the draft Local Plan, the adoption of the plan is now expected in 2027.

4.8 Whilst not yet a material consideration, some/limited weight has been given to emerging policy as the draft policies are yet to be fully independently examined by the Planning Inspectorate.

National Planning Policy Framework (NPPF) (2024) – Leisure and Health Impact and Sequential

4.9 Paragraph 8 of the NPPF notes, in seeking to achieve sustainable development, the planning system has three overarching objectives, which are:

- an economic objective
- a social objective; and
- an environmental objective

4.10 In respect of the social objective, the NPPF seeks to support strong, vibrant, and healthy communities, notably, (inter alia) proposals which support a communities' health, social and cultural well-being.

4.11 The NPPF recognises the importance of sports and recreation facilities as key mechanisms which can promote 'healthy and safe communities' (Chapter 8). The Framework states that planning policies should aim to achieve healthy, inclusive and safe places which:

"enable and support healthy lives, through both promoting good health and preventing ill-health, especially where this would address identified local health and well-being needs and reduce health inequalities between the most and least deprived communities – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling (Paragraph 96c)".

4.12 Paragraph 103 of the NPPF further considers that access to (inter alia) and opportunities for sport and physical activity is important for the health and well-being of communities.

4.13 Paragraph 94 of the NPPF confirms that when assessing applications for retail, leisure, office and other town centre related development outside town centres, which are not in accordance with an up-to-date plan, local planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold. If there is no locally set threshold, the default threshold is 2,500m² of gross floorspace. This should include an assessment of the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment (as applicable to the scale and nature of the scheme).

4.14 Chapter 7 of the NPPF sets out the government's aspirations for ensuring the vitality of town centres. Paragraph 90 (a) states that planning policies should:

'define a network and hierarchy of town centres and promote their long-term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes in retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters.'

4.15 The paragraph further notes in part (d) that Plans should:

'allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead. Meeting anticipated needs for retail, leisure, office and other main town centre uses over this period should not be compromised by limited site availability, so town centre boundaries should be kept under review where necessary.'

4.16 Part (e) of the paragraph states that:

‘where suitable and viable town centre sites are not available for main town centre uses, allocate appropriate edge of centre sites that are well connected to the town centre. If sufficient edge of centre sites cannot be identified, policies should explain how identified needs can be met in other accessible locations that are well connected to the town centre.’

- 4.17 Paragraph 91 of the NPPF states that LPA’s should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered.
- 4.18 Paragraph 92 of the NPPF states that 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. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre or edge of centre sites are fully explored.

Wiltshire Development Plan and Local Plan Review – Sequential, Impact and Health

- 4.19 The Wiltshire Core Strategy was adopted by Wiltshire Council in 2015. Alongside the adopted Policies Map (2015), Chippenham Site Allocation Plan (2017), Chippenham Neighbourhood Plan 2023-2038 (2024), these provide an up to date Development Plan for the Site.
- 4.20 Core Policy 38 of the Core Strategy states that all proposals for leisure uses not within a town centre, and in excess of 200 sqm, must be accompanied by an impact assessment, which meets the requirement of national guidance and established best practice and demonstrates that the proposal will not harm the vitality or viability of any nearby centre. In addition, proposals should comply with the sequential approach, as set out in national guidance, to ensure that development is on the most central site available.
- 4.21 Saved Policies in the North Wiltshire Local Plan (2011) identify the designated frontages and corresponding policies which were carried forward as part of the adopted Core Strategy (2015). This includes relevant Policies R1 (Town centre primary frontage areas) and R2 (Town centre secondary frontage areas).
- 4.22 Draft Policy 6 of the Wiltshire Local Plan Review confirms that development at Chippenham will provide new employment opportunities...with a strong emphasis on timely delivery to redress the existing levels of net out-commuting within the town and better enable people to live and work locally. The policy also notes that development will ensure the town centre will be a vibrant meeting place for the community to shop, interact and enjoy their leisure time.
- 4.23 Draft Policy 8 notes that proposals which contribute to the delivery of a thriving, vibrant and prosperous town centre will be supported.
- 4.24 Draft Policy 67 confirms that proposals for Main Town Centre Uses on sites outside of the defined Town Centres must be accompanied by a sequential test. This requires applications for Main Town Centre uses to be located primarily in town centres and secondarily at edge

of centre locations. Only in cases where suitable sites are not available, should out of centre sites be considered. In all circumstances, applicants are required to demonstrate flexibility in terms of the scale and format of their proposed development and in the consideration of alternative sites. In relation to edge and out of centre proposals, preference will be given to accessible sites that are well connected to nearby town centres.

- 4.25 Draft Policy 67 also retains the adopted 200+ sqm threshold on sites outside of defined town centres to provide a retail impact assessment to address the impact on public and private sector investment within centres in the catchment area of the proposal; and the impact of the proposal on town centre vitality or viability, including: local consumer choice and trade in the town centre and wider area; and a cumulative assessment of the proposal together with committed and recently completed developments, plus developments under construction.
- 4.26 Draft Policy 68 discusses the management of town centres and outlines the town centre hierarchy confirming that Chippenham is a principal settlement and Calne, Corsham and Melksham are other market towns within the Site's defined catchment area.
- 4.27 Draft Policy 81 notes that the development of new community facilities (including leisure, sport and health facilities) within and adjoining settlement boundaries will generally be supported where it is demonstrated that the development will: contribute towards making the settlement more sustainable; be appropriate to its landscape and environmental setting; be well related to an existing settlement; and lead to no highway safety issues or adverse impacts on the local transport network.
- 4.28 Draft Policy 83 states that proposals should demonstrate that development will contribute positively to health and wellbeing by enabling and promoting healthy lifestyles and minimising any negative health and wellbeing impacts. A Health Impact Assessment should also be undertaken for non-residential development proposals above 1ha and employment development proposals above 5ha.
- 4.29 Draft Policy 84 states that all major new development must make provision for public open space and, where appropriate, play facilities. In addition, all development must protect and improve the quantity, quality, and accessibility of and to public open space.

Sport England – Planning for Sport Guidance (2019)

- 4.30 In June 2019, Sport England produced the Planning for Sport Guidance that focuses on 12 principles which seek to help the planning system provide opportunities for all to take part in sport and physical activity.
- 4.31 The guidance builds upon the importance the Government has placed on the need for the planning system to enable and support healthy lifestyles, in the National Planning Policy Framework.
- 4.32 At the heart of the guidance are the overarching principles, principle 1 states planning must recognise and give significant weight to the benefits of sports and physical activity. It is acknowledged that formal, informal, team, group or individual activities, sport and physical activity generates considerable socio-economic benefits to individuals, communities and the wider society. The guidance also provides a set of principles following three key themes; protect, enhance and provide.

- 4.33 Principle 6 states planning must “*support improvements to existing sport and physical activity provision where they are needed*”. The guidance adds improvements to existing sports and physical activity provision can play a key role in helping people to become and stay active as well as improving the use and viability of the provision. They can enhance the experience for existing users, increase the capacity of the provision and ensure the best use is made of a site for sport and physical activity.

Wiltshire Playing Pitch Strategy (2017) and Playing Pitch Strategy and Action Plan 2024 – 2034 (2024)

- 4.34 The Playing Pitch Strategy (PPS) for Wiltshire Council was adopted in 2024 and builds upon a preceding Assessment Report in 2017. The reports provide a strategic framework in relation to the provision of playing pitch facilities in Wiltshire. The remit of the Playing Pitch Strategy covers the major ‘pitch sports’ comprising Association Football; Cricket; Hockey; Rugby, 3G pitches and some grass pitch sports (e.g. American Football and Aussie rules).
- 4.35 The Strategy confirms that the existing position for all playing pitch sports is either that demand is being met or that there is a shortfall, whereas the future position shows the exacerbation of current shortfalls and the creation of additional shortfalls for some pitch/facility types and in some areas where demand is currently being met. In relation to football, there is also a specific shortfall of 3G pitches that can only be met through increased provision.

Wiltshire Retail and Town Centres Study (2020)

- 4.36 Given that David Lloyd is considered ‘commercial leisure,’ and a town centre use, it falls to be assessed under the Wiltshire Retail and Town Centres Study 2020, prepared by Avison Young (‘AY’) and published in November 2020 pre-Covid-19. The Study provides evidence base information on retail and town centre planning issues associated with the Wiltshire Local Plan Review.
- 4.37 The Study confirms that Chippenham is a healthy town centre, which has been able to adapt to the ongoing trends facing the UK retail sector and also the significant changes in out of centre floorspace in the town. The town centre has seen falling vacant retail units alongside changes to the comparison goods and service sectors, which have mirrored the national trends. It is noted that in terms of new town centre redevelopment opportunities, the Bath Road car park and adjacent Bridge Centre site remain the most obvious opportunity to introduce new land uses into the town centre.
- 4.38 The Study notes, from the findings of the household survey on the usage of health and fitness facilities in Chippenham, that the most popular facility amongst residents is the Olympiad Leisure Centre at Sadlers Mead. This has a 54% of all trips from those residents in the study area that use health and fitness facilities and provides a wide offer including a gym, swimming pool, sports hall and spaces for various types of fitness classes. It is also notable that 22% of local residents also use the Springfield Leisure Centre in Corsham. The Olympiad Leisure Centre has a limited draw beyond the Chippenham study area, with 8% of trips from Corsham residents and 3% of trips from Calne residents.

- 4.39 The Study also confirms that Calne is considered to be a town centre with a localised retail function whose catchment is influenced by the nearby higher order centre of Chippenham and Corsham is one of the smaller main town centres in Wiltshire and performs a localised retail and service function. Melksham is seen to have a limited shopping catchment due to its location close proximity and relationship to Chippenham and Trowbridge, particularly in relation to comparison goods shopping.
- 4.40 To note, the Study does not provide detailed information on the need for health and fitness facilities in Wiltshire and therefore the study is considered to be of limited use for this assessment.

Retail & Town Centres Position Statement (2025)

- 4.41 The Retail and Town Centres Position Statement was prepared by Nexus Planning for Wiltshire Council and published in April 2025. The Statement provides updates to the Wiltshire Retail & Town Centres Study 2020 prepared by Avison Young, forming part of the evidence base for the Wiltshire Local Plan Review.
- 4.42 The Position Statement was prepared in response to the Inspector's Initial Questions, contained within a letter dated 27th February 2025 to the Council. The Statement concludes that alongside the focus on town centre needs, part of the overall retail and leisure expenditure growth (and quantitative capacity) within the main settlements is associated with strategic residential-led land allocations. As a consequence, and also taking into account locationally-specific qualitative needs, it is appropriate that part of the overall identify need is focused upon planning permissions for new local / neighbourhood centres within these draft Local Plan allocations.
- 4.43 As above, the updated Statement does not provide much information on the need for health and fitness facilities in Wiltshire and therefore the study is considered to be of limited use for this assessment.

5.0 Sequential Test

5.1 Paragraph 91 of the NPPF (2024) states that:

‘Local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered.’

5.2 Paragraph 92 of the NPPF (2024) adds that ‘Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre or edge of centre sites are fully explored.’

5.3 The Town Centres and Retail section of the National Planning Practice Guidance (NPPG), updated in September 2020, provides further guidance. Paragraph 011 of the NPPG (Reference ID: 2b-011-20190722) sets out a checklist in relation to determining whether a proposal complies with the sequential test. Considerations include:

- Has the suitability of more central sites to accommodate the proposal been considered?
- Is there scope for flexibility in the format and/or scale of the proposal?
- If there are no suitable sequentially preferable locations, the sequential test is passed.

5.4 Paragraph 012 of the NPPG (Reference ID: 2b-012-20190722) sets out how locational requirements should be considered in the sequential test. It states that:

‘Use of the sequential test should recognise that certain main town centre uses have particular market and locational requirements which mean that they may only be accommodated in specific locations. Robust justification must be provided where this is the case, and land ownership does not provide such a justification.’

Interpretation of Suitability

5.5 The NPPF (2024) is clear that applicants and local planning authorities should demonstrate flexibility when applying the sequential test, specifically on issues such as format and scale, in the assessment of site ‘suitability’ for development proposals.

5.6 The correct interpretation of ‘suitable’ in the application of the sequential test has been established by the Supreme Court. In the Dundee¹ judgement, Lord Hope confirmed at paragraph 29 that:

‘...the applicant is expected to have prepared his proposals in accordance with the recommended approach: he is, for example, expected to have had regard to the circumstances of the particular town centre, to have given consideration to the scope for accommodating the development in a different form, and to have thoroughly assessed sequentially preferable locations on that footing. Provided the applicant has done so, however, the question remains...whether an alternative site is suitable for the proposed development, not whether the proposed development can be altered or reduced so that it can be made to fit an alternative site.’

¹ Tesco Stores Limited v Dundee City Council (2012).

- 5.7 This principle has since been established in English law in the Administrative Court judgement in the case of Zurich². Paragraph 61 of that judgement set out:

‘It is also important to mark that developers, and planning authorities, work in the real world. Marks & Spencer had assessed the only available town centre alternative to the Site, and had concluded that a development that was smaller than that proposed, or one with a more restricted range of goods, was neither commercially viable nor suitable for their commercial requirements. On the basis of that assessment, emphasised by their representative who spoke at the planning committee hearing, the officer and committee knew that, if this planning permission was refused, then Marks & Spencer would not locate into Scunthorpe town centre.’

- 5.8 As Lord Reed said in Tesco v Dundee, at [29]:

“Provided the applicant has [given consideration to the scope for accommodating the development in a different form and to have thoroughly assessed sequentially preferable locations]... the question remains... whether an alternative site is suitable for the proposed development, not whether the proposed development can be altered or reduced so that it can be made to fit an alternative site”: to which Lord Hope perceptively added, at [38]: “[T]he context indicates that the issue of suitability is directed to the developer’s proposals, not some alternative scheme which might be suggested by the planning authority. I do not think that this is in the least surprising, as developments of this kind are generated by the developer’s assessment of the market that he seeks to serve. If they do not meet the sequential approach criteria, bearing in mind the need for flexibility and realism to which Lord Reed refers...they will be rejected. But these criteria are designed for use in the real world in which the developers wish to operate, not some artificial world in which they have no wish in doing so.’

- 5.9 The NPPF (2024) (and the NPPG) is silent on the need for planning applications for main town centre uses that are not in an existing centre to demonstrate whether the proposals can be disaggregated, or divided, into constituent parts across one or more sequential preferable site.

- 5.10 This is supported by Secretary of State appeal decisions – including Rushden Lakes³, Scotch Corner⁴ and Handforth Dean⁵ – as considered below.

- 5.11 In the Rushden Lakes decision, relating to LXB’s proposals for out-of-centre retailing, restaurants, garden centre, lakeside visitor centre and boat house, the Inspector reflected at paragraph 8.45 that:

‘In summary it [the Dundee judgement] establishes [a] that if a site is not suitable for the commercial requirements of the developer in question then it is not a suitable site for the purposes of the sequential approach; and [b] that in terms of the size of the alternative site, provided that the Applicant has demonstrated flexibility with regards to format and scale, the question is whether the alternative site is suitable for the proposed development, not whether the proposed development could be altered or reduced so that it can be made to fit the alternative site. These points although related are distinct.’

² Zurich Assurance Ltd T/A Threadneedle Property Investment v North Lincolnshire Council (2012).

³ APP/G2815/V/12/2190175 (11 June 2014).

⁴ APP/V2723/V/15/3132873 & APP/V2723/V/16/3143678 (1 December 2016).

⁵ APP/R0660/V/17/3179610 (12 June 2019).

- 5.12 He observed at paragraph 8.47 that there is no requirement for disaggregation in the NPPF (2024)⁶ and expressly concluded at paragraph 8.48 that:

‘The sequential test relates entirely to the application proposal and whether it can be accommodated e.g. on a town centre site.’

- 5.13 The Secretary of State, in his decision letter, confirmed this approach. It states at paragraph 15, that:

‘Furthermore, having regard to the arguments put forward by the Inspector at IR8.44-8.48, the Secretary of State agrees with his conclusion at IR8.48 that the sequential test relates entirely to the application proposal and whether it can be accommodated on an actual alternative site (e.g. a town centre site). The Secretary of State agrees with the Inspector’s conclusions on the sequential test in IR8.48.’

- 5.14 The subsequent Scotch Corner decision considered (inter alia) whether the proposed out-of-centre retail development at Scotch Corner passed the sequential test. The Secretary of State endorsed the Inspector’s conclusions at paragraph 11.7 in relation to the sequential approach, namely:

- 5.15 *‘In carrying out the sequential test it is acknowledged that whilst Framework paragraph 24 [paragraph 87 of the revised Framework] indicates that applicants should demonstrate flexibility on issues such as format and scale, it does not require the applicant to disaggregate the scheme. The sequential test seeks to see if the application, i.e. what is proposed, can be accommodated on a town centre site or on sequentially preferable sites.’*

- 5.16 On 12 June 2019 (and therefore in the context of the revised NPPF in that year), the Secretary of State supported the Inspector’s remarks at paragraph 9.232 in the Handforth Dean decision that disaggregation should not apply; and that a sequentially preferable site should be ‘reasonably or closely similar’ to the proposal site. In that case, three separate applications for full planning permission were made as a single but phased site-wide proposal, which was a ‘fully worked up scheme based on operator input.’ The Secretary of State agreed with the Inspector’s conclusion that it ‘is the culmination of the phased components’ of the development that should be determined.

- 5.17 The above cases provide important legal precedent and interpretation of the manner in which the sequential approach should be applied.

The Applicant’s Flexibility

- 5.18 The David Lloyd model sits between a Class E(d) use for indoor sport, recreation or fitness with some Class F2(d) for indoor / outdoor swimming pools and external sports and recreation areas, which therefore has an impact on the requirement and application of the sequential assessment.

- 5.19 A David Lloyd club has a number of constituent elements, including tennis courts, padel courts, all weather dome, gym, fitness operations, food and beverage uses, spa facilities and a small sports shop, all supported by car parking and an attractive landscape setting.

⁶ The Inspector’s comment related to the original NPPF but the revised NPPF (December 2024) is also silent on the requirement for disaggregation.

Individually, these constituent uses would not make the contribution required or meet the functional business model for the health and racquets club.

5.20 By its very nature, the ‘*main town centre use*’ comprising a David Lloyd club has ‘*particular market and locational requirements which mean that they may only be accommodated in specific locations*’ as the NPPG identifies.

5.21 It is noted that in the Council’s pre-application advice relating to the proposals, Officers stated that “*it could be argued that, if disaggregated, then these facilities are all often at central locations where they can be accessed more readily by active travel and public transport. In short, I think further information is required to justify this location and understand how it might impact Chippenham town centre and other local centres*”.

5.22 This cannot be achieved: disaggregation, simply, would not achieve a David Lloyd Club, nor the employment benefits which would flow from a David Lloyd Club. Based on the case law above, David Lloyd have adopted a precautionary approach with its ‘flexibility’ of business model, and have undertaken a sequential assessment based on its constituent, rather than separate uses.

5.23 Specifically, the sequential assessment should be applied to the main town centre uses ‘as a whole’ (i.e. the proposal for which David Lloyd seeks planning permission as established by the Supreme Court in the Dundee judgement).

Scope of the Sequential Assessment

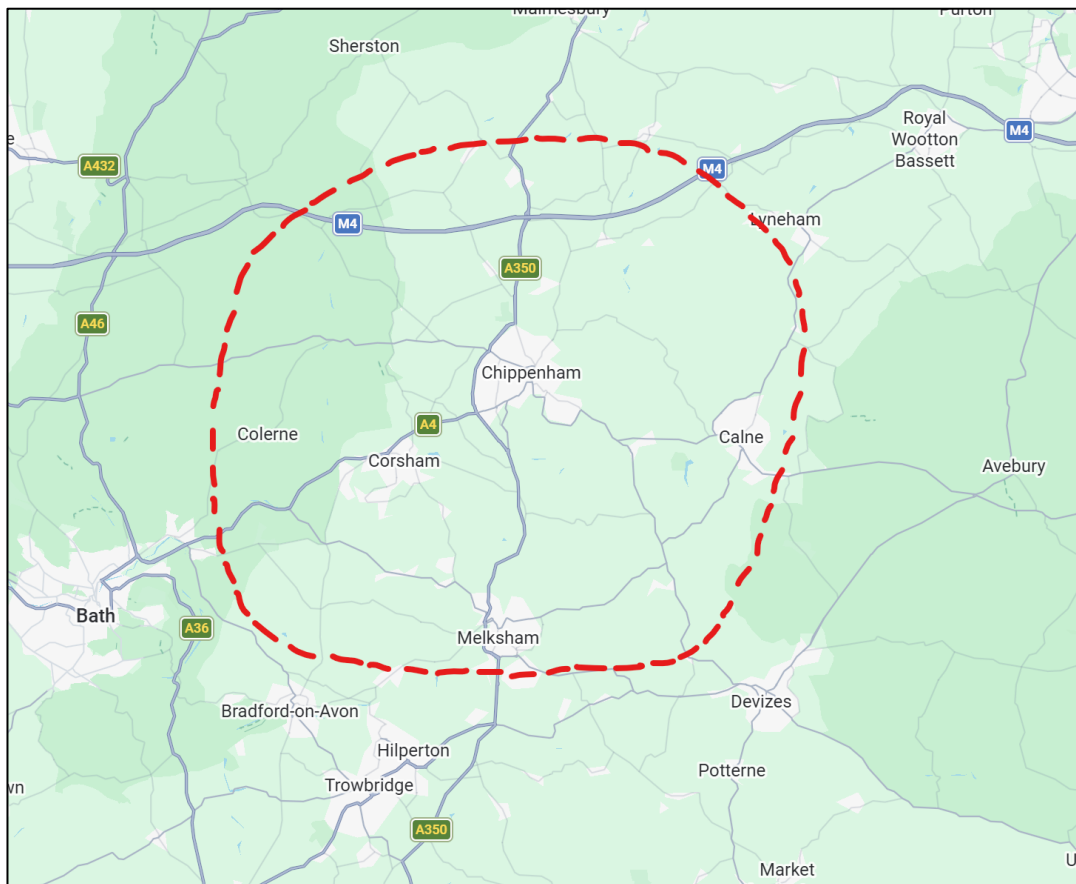
5.24 The area of search for sequential assessments is dependent on the type and amount of development proposed and the market that development intends to serve.

5.25 To that end, as noted earlier, we consider the search area should be generally confined to the area of Chippenham and the surrounding market towns of Calne, Corsham and Melksham. This wider search area is highlighted within Figure 5.1 below.

5.26 Noting that existing David Lloyd clubs exist in Bristol Emersons Green, Swindon and Gloucester which would suggest a decision to locate in these town centres unlikely, this Sequential Assessment therefore focuses on the Wiltshire Council ‘principal settlement’ of Chippenham and ‘market towns’ of Calne, Corsham and Melksham.

5.27 This remains in accordance with the designated retail centre hierarchy and town centre strategy within Core Policies 1 and 38 of the adopted Core Strategy (2017) and draft Policies 67 and 68 of the Local Plan Review (2023).

Figure 5.1 Scope of Sequential Assessment



Source: Google Maps 2026, with Lichfields mark-up

Alternative Sites

- 5.28 The 'availability' and 'suitability' of sequentially preferable locations is fundamental to the sequential assessment and reasonable flexibility should be applied when considering the availability and suitability of alternative sites⁷.
- 5.29 Core Policy 9 of the Core Strategy (2015) outlines the Chippenham Central Areas of Opportunity and states that the redevelopment of the following sites will be supported:
- i **Bath Road Car Park/Bridge Centre Site** - *to form a retail extension to the town centre to provide a supermarket and comparison units.*
 - ii **Langley Park** - *to deliver a mixed use site solution for a key redevelopment opportunity area to support the retention of significant business uses on part of the site.*
- 5.30 The policy goes on to note that the River Avon Corridor will be enhanced for leisure and recreation uses (inc. Olympiad Leisure Centre) in an environmentally sensitive manner and developed as an attractive cycle/ pedestrian route connecting the town centre with the wider green infrastructure network, while conserving and enhancing its role as a wildlife corridor.

⁷ Paragraph 24 of the Secretary of State's decision letter in relation to APP/P0119/V/17/3170627 (1 October 2018).

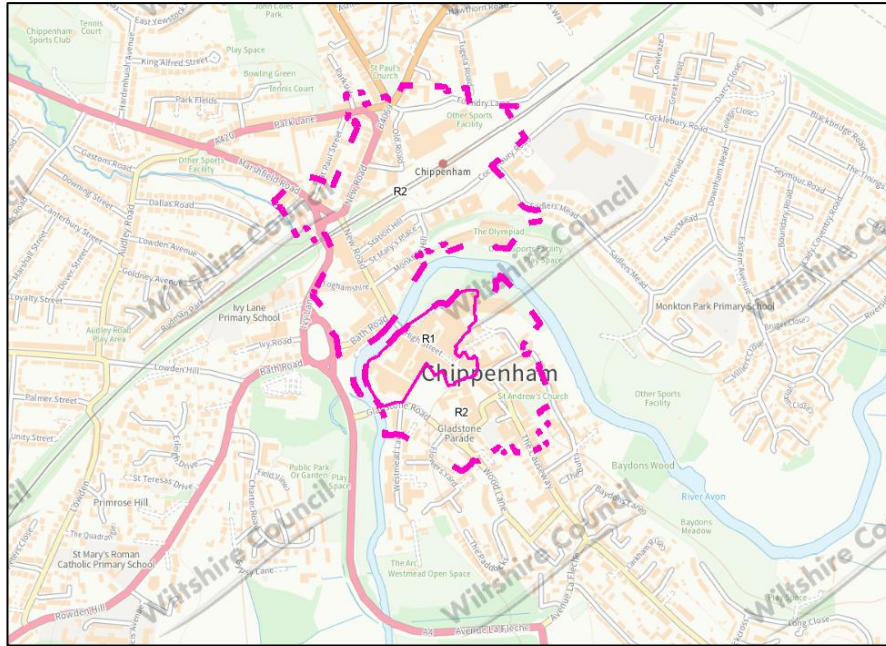
- 5.31 The Chippenham Site Allocations Plan (2017) identifies two main strategic site allocations which sit outside the Chippenham settlement boundary, shown in Core Policy 2 of the Wiltshire Core Strategy, located edge of centre to Chippenham town centre.
- 5.32 These allocations comprise:
- 1 **South West Chippenham** (Policy CH1) – *NB: This site has been excluded from the sequential assessment as the application site is located within this allocation.*
 - 2 **Rawlings Green** (Policy CH2)
 - 3 **Chippenham Riverside Country Parks** (Policy CH3) – *NB: These sites have also been excluded as they comprise land adjacent to the above allocations and the River Avon which will be specifically developed to be used as country parks.*
- 5.33 Policy TC1 of the Chippenham Neighbourhood Plan (2024) states that the Bath Road Car Park/Bridge Centre site represents a key regeneration opportunity as an extension of the town centre for mixed-use development. Policy TC2 also discusses the River-Green Corridor Masterplan which aims to promote and enhance the special character of Chippenham as a historic, riverside, market town and the corridor as a focal point for the town and is adjacent to the Emery Gate shopping centre site.
- 5.34 Policy 6 of the Local Plan Review carries forward Policies CH1 and CH2 of the Chippenham Site Allocations Plan and confirms both of these existing allocations will be provided over the plan period (2020-2038).
- 5.35 Policy 7 of the Local Plan Review also includes a new site allocation at Land South of Chippenham and East of Showell Farm comprising approx. 347ha allocated for the development of 2,525 dwellings, 15ha employment land, along with a district and local centre, schools and an extended River Avon country park. This site sits outside of the settlement boundary (out of centre) and is also adjacent to the South West Chippenham Policy CH1 site allocation where the application site is located and has therefore been excluded from the sequential assessment.
- 5.36 Policy 8 of the Local Plan Review discusses three opportunities sites which are supported for redevelopment in the following locations:
- 1 **Bath Road Car Park and Bridge Centre**
 - 2 **Emery Gate Shopping Centre**
 - 3 **Chippenham Railway Station⁸ and Cocklebury Road area** – *NB: This site, and the adjacent Langley Park site, has been excluded from the sequential assessment as it is allocated for business investment and comprises the Grade II listed railway station and the associated infrastructure which could not accommodate the scale required for a new David Lloyd Club.*
- 5.37 As noted below, Figure 5.2 highlights the adopted Chippenham Town Centre Primary Frontage area in pink and the Secondary Frontage Area shown in pink dots. Additionally, Figure 5.3 shows the revised town centre boundaries and primary shopping areas in the Local Plan Review (2023). Finally, Figure 5.4 highlights the Chippenham town centre boundary shown in the Chippenham Neighbourhood Plan (2024).

⁸ GWR and Wiltshire Council are currently undertaking a significant redevelopment of the listed station and its associated buildings where this opportunity site is situated, including public realm improvements and a new Station Square entrance, refurbished short-stay car park, new bus shelters, improved taxi ranks and enhanced accessibility with new lifts and a bridge.

5.38

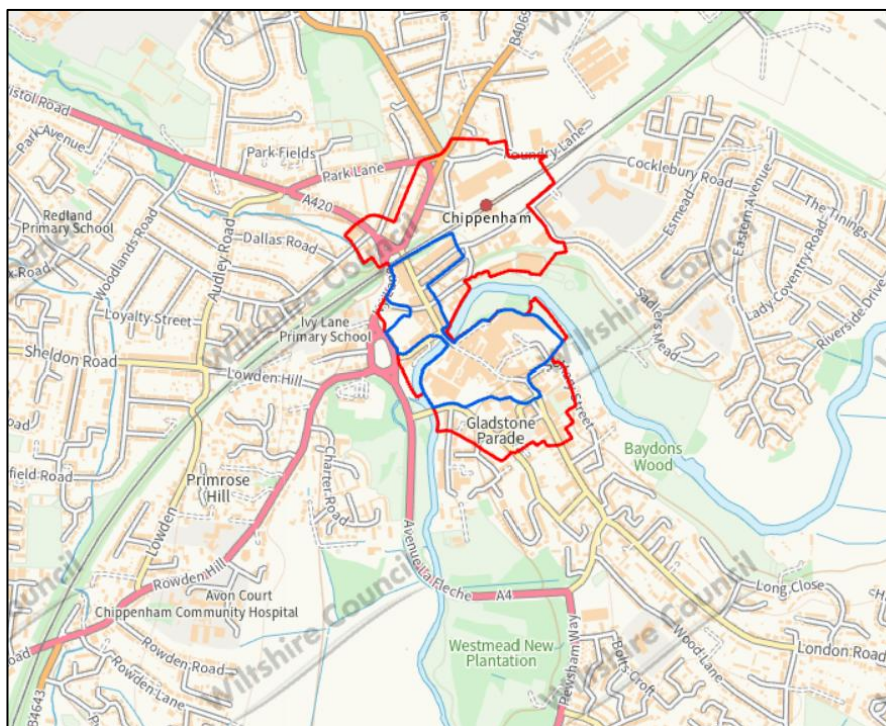
Chippenham town centre has a mix of building styles, with the area to the south of the river accommodating a higher proportion of more historic buildings. The primary shopping area comprises a mix of development including 2 to 3 storey terraced properties and narrow part-pedestrianised streets creating an attractive environment for visitors.

Figure 5.2 Chippenham Town Centre



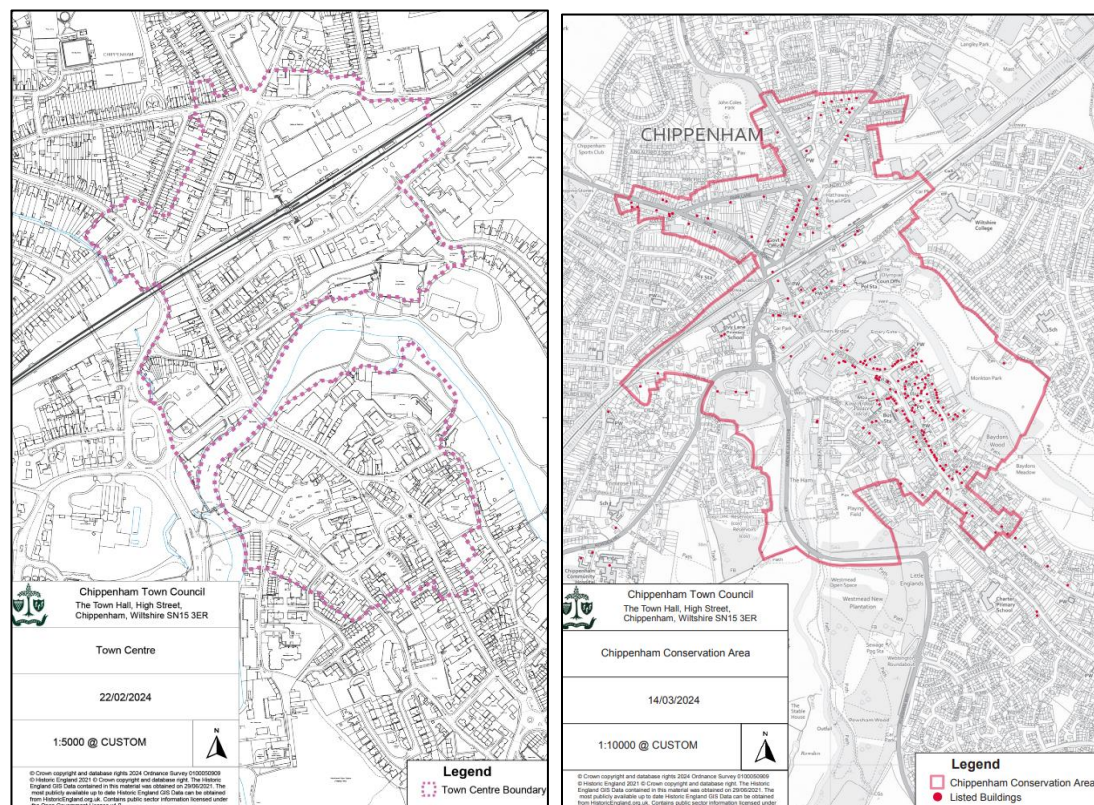
Source: Chippenham Town Centre Primary Frontage area (Saved Policy R1 - pink line) and Secondary Frontage area (Saved Policy R2 - pink dots) on adopted Core Strategy Policies Map (2015)

Figure 5.3 Chippenham Town Centre



Source: Chippenham Town Centre (red) and Primary Frontages (blue) on Local Plan Review Policies Map (2023)

Figure 5.4 Chippenham Town Centre and Chippenham Conservation Area and Listed Buildings

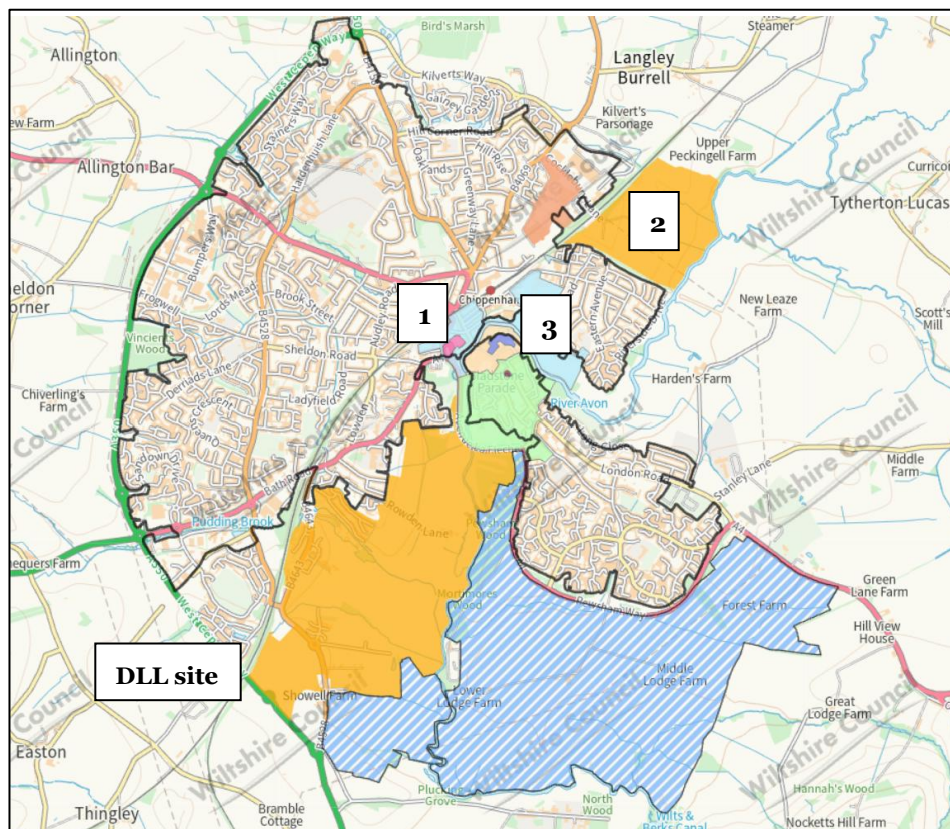


Source: Left: Chippenham Town Centre boundary (pink) and Right: Figure 8.5, Chippenham Conservation Area and Listed Buildings - Chippenham Neighbourhood Plan (2024)

- 5.39 It is noted that the whole of Chippenham Town centre is located within Chippenham Conservation Area and contains a significant amount of Grade I, II and II* listed buildings within the Primary and Secondary Frontages and further afield. The majority of the Buildings of Local Merit, non-designated heritage assets, which have been identified in the Chippenham Neighbourhood Plan are located in the adopted and emerging town centre boundary.
- 5.40 Figure 5.4 above highlights the extent of the Conservation Area and the extensive listed buildings (shown by red dots), as shown in the Chippenham Neighbourhood Plan, and demonstrates the significant heritage context of the area and underlying sensitivities of redevelopment within the town centre boundary.
- 5.41 Based on the above, sequential sites have been reviewed and based on locations within Chippenham town centre and edge of centre in terms of their suitability, viability and availability to accommodate development. On this basis, the potential sequential sites have been identified below in Figure 5.5 with regards to their potential to accommodate development.

Potential Sequential Sites: Chippenham Town Centre

Figure 5.5 Potential Sequential Sites: Chippenham Town Centre



Source: Wiltshire Local Plan Review Draft Policies Map (2023), with Lichfields approx. mark-up of sequential sites

1. Bath Road Car Park and Bridge Centre

- 5.42 The site is identified by the Chippenham Town Council in the Chippenham Neighbourhood Plan as “a longstanding blight on Chippenham Town Centre and is a key regeneration opportunity for the town”. The allocation site comprises land in the Chippenham Conservation Area where a former youth centre was previously located (demolished in 2017), as well as the Grade II Listed Bank House and a large car park on Bath Road.
- 5.43 Core Policy 9 of the adopted Core Strategy allocates the site as a retail extension to the town centre to provide a supermarket and comparison units. This is echoed by the allocation in Chippenham Neighbourhood Plan which seeks to create a high quality development which suits the site’s town centre location. Annexe 6⁹ of the Chippenham Neighbourhood Plan splits the allocation site into different zones and suggests parameters and uses for future development proposals including:
- **Zone 1** - Large retail unit, office headquarters, hotel, or multi-storey public car park.
 - **Zone 2** - Ground floor retail units, restaurants, cafes or bars, or upper floor residential apartments.

⁹ Design Brief Parameters for Bath Road Car Park/ Bridge Centre Site

- **Zone 3** - Low-cost, flexible E Class units, with small floor areas, including niche/independent retail and pop-up shops; restaurants, cafes or bars; workshops; incubator units; arts or community uses.
- **Zone 4** - New public square to anchor the development.

5.44 In considering the suitability, viability and availability under the NPPF (2024) tests, we conclude:

5.45 **Suitability:** The site is not suitable for a David Lloyd Club, given the allocation as an extension to the town centre for retail/main town centre uses, heritage constraints, as well as the extensive open space areas required for external playing areas / courts.

5.46 **Viability:** It is not clear whether a viable scheme could be delivered: we would suggest one could not be made viable given the site's history and the preference for retail and residential development, versus the capital receipt likely from a David Lloyd Club.

5.47 **Availability:** The site is understood to be partially vacant, partially used as a car park, but is allocated for other uses including the pursuit of retail/main town centre uses and residential development, in line with the intention of the allocation in the Core Strategy and Neighbourhood Plan.

2. Rawlings Green

5.48 The site comprises approx. 50ha of farmland within a rural and remote context on the outskirts of the settlement of Chippenham and includes the Grade II listed Rawlings Farmhouse.

5.49 The Chippenham Site Allocations Plan identifies the site for a mixed use development for 650 dwellings, 5ha of land for employment generating uses (B1, B2, C2, D1 and D2 uses), a 2 Form Entry primary school, a Link Road from Parsonage Way to Darcy Close, strategic landscaping and open space, and the creation of an approx. 10ha Country Park along the northern and eastern edge of new development.

5.50 Outline planning permission was granted on the site in October 2021 for “*up to 650 Dwellings, Including 5ha Employment Generating Space and a 2 Form Entry Primary School. Up to 10ha New Public Open Space Including Country Park, Landscaping, Stormwater & Foul Drainage Works, Substation and Associated Infrastructure Works. Access Using Parsonage Way - Over New Railway Bridge, Darcy Close and from Cocklebury Lane (for Pedestrian/Emergency Works)* (ref: 15/12351/OUT).” Reserved matters applications have now been submitted to the Council and are awaiting determination (refs: PL/2024/09507 & PL/2024/06987.)

5.51 In considering the suitability, viability and availability under the NPPF (2024) tests, we conclude:

5.52 **Suitability:** The site is not suitable for a David Lloyd Club, given the allocated residential-led development and other requirements for a primary school and country park, noting the extensive open space areas required for external playing areas / courts.

5.53 **Viability:** It is not clear whether a viable scheme could be delivered: we would suggest one could not be made viable, given the preference for residential-led development, versus the capital receipt likely from a David Lloyd Club.

- 5.54 **Availability:** The site is not available as it is being pursued for other interests including mixed-use residential-led development in an outline planning permission recently approved by the Council, in line with the policy intention.

3. Emery Gate Shopping Centre

- 5.55 The site comprises the Emery Gate indoor shopping centre, located within the adopted primary retail frontage, the vacant former Tesco supermarket and ‘podium’ level car parking within the secondary frontage area.
- 5.56 Policy 8 of the Local Plan Review allocates the site for a mix of retail, commercial, leisure, evening economy and residential uses and confirms that the shopping centre must retain some anchor retail units; any residential uses will be on upper floors and not have a detrimental impact on the continuing use of other units for retail, leisure and commercial uses; active frontage onto the River Avon corridor is maximised; improved pedestrian links between the shopping centre, the River Avon and the High Street; and a review is carried out of car parking requirements at the Emery Gate Car Parks to consolidate that use where possible and open up development opportunities on the site.
- 5.57 An application was submitted in December 2024 for the “*part-demolition of existing buildings and full planning permission for new buildings for Commercial, Business and Service (Use Class E), Local Community and Learning (Use Class F1/F2), and residential (Use Class C3) uses, along with new landscaping, public realm, retained parking, cycle parking, servicing, utilities, plant and pedestrian access routes onto Island Park*” (ref: PL/2024/11661). On 10th February 2026, the Council’s Strategic Planning Committee approved Chippenham Riverside Ltd.’s (Acorn Property Group) plans for the redevelopment of Emery Gate Shopping Centre.
- 5.58 In considering the suitability, viability and availability under the NPPF (2024) tests, we conclude:
- 5.59 **Suitability:** The site is not suitable for a David Lloyd Club, given the allocation for a mix of retail, commercial, leisure, evening economy and residential uses, noting the extensive open space areas required for external playing areas / courts.
- 5.60 **Viability:** It is not clear whether a viable scheme could be delivered: we would suggest one could not be made viable, given the preference for the mixed use/residential-led development, versus the capital receipt likely from a David Lloyd Club.
- 5.61 **Availability:** The site is not available as it is being pursued for other interests including the development approved at Strategic Planning Committee in February 2026, in line with the policy intention.

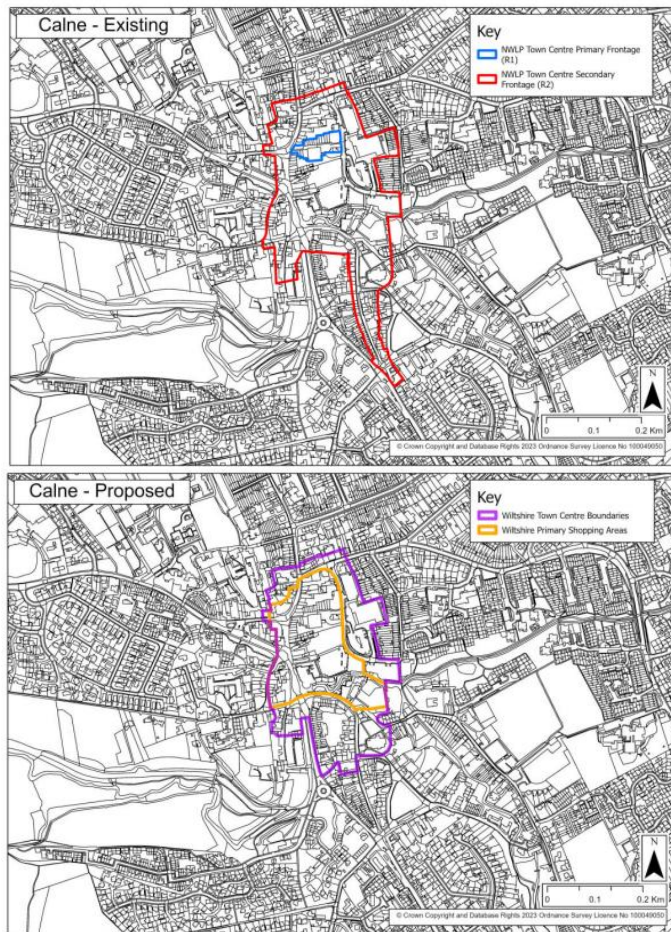
Summary - Chippenham Town Centre

- 5.62 Through our review, there have been no sites identified within the defined Town Centre area which would be suitable for the scale of development which David Lloyd requires for a new leisure club development (approx. 2 hectares).
- 5.63 Due to the predominantly historic character of the area and the town situated within Chippenham Conservation Area, there are also no edge of centre sites which would be considered appropriate or suitable for a new David Lloyd Club.

Potential Sequential Sites: Calne Market Town Centre

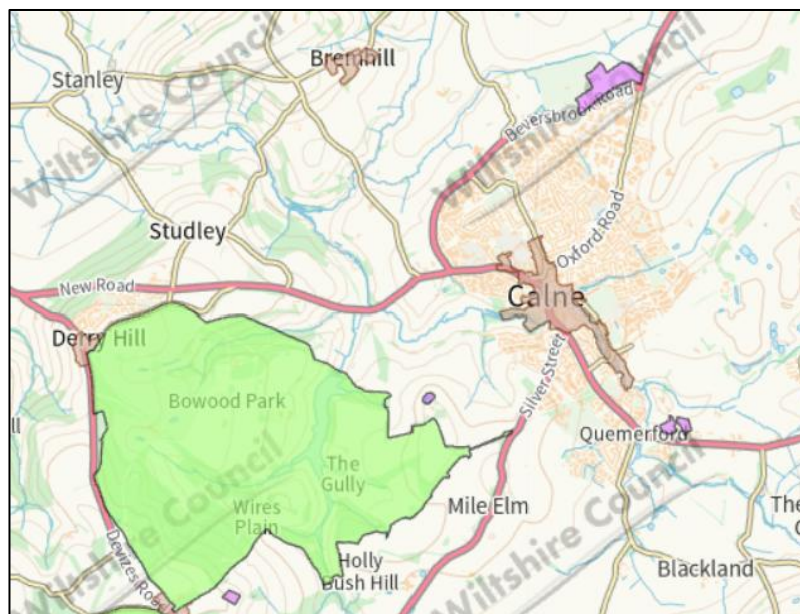
- 5.64 Calne and its market town centre are situated in the northern part of Wiltshire and located to the east of Chippenham and the south-west of Royal Wootton Bassett. Calne lies on the River Marden and is in close proximity to the north-western edge of the North Wessex Downs AONB.
- 5.65 Calne is considered one of the oldest Market Towns in Wiltshire, identified by its town centre historic quarter around St Mary's Church and the heritage centre. The centre is focused on its river frontage and the old coaching road (A4) and the adopted primary frontage covers a small area across Phelps Parade whilst the secondary frontage covers the southern end of Wood Street, High Street, The Strand, Church Street, Mill Street, The Pippin and the western end of Oxford Street. The town centre comprises mainly retail outlets, solicitors, estate agents, accountants, hairdressers, cafes, food outlets, public houses and restaurants and some independent retailers.
- 5.66 Core Policy 8 of the adopted Core Strategy identifies that over the plan period (2006-2026), 6 hectares of new employment land will be provided, including 3.2 hectares at **Land East of Beversbrook Farm and Porte Marsh Industrial Estate** (Saved North Wiltshire District Plan Allocation).
- 5.67 Core Policy 9 of the Local Plan Review confirms that the remainder of the employment land allocation above is to be provided on the site and continues to form part of the strategy for the settlement. The policy also includes two new allocations comprising:
- 1 **570 dwellings, a small local centre, nursery and 0.5ha employment land for office use on land to north of Spitfire Road (Policy 11)** - NB: *This site has been excluded from the sequential assessment as it is allocated for residential-led development with a very small component of employment development which would not be suitable, viable or available for a new David Lloyd club.*
 - 2 **2.7ha employment land on Land off Spitfire Road (Policy 10)**
- 5.68 Policy WS4, Calne Town Centre, of the Calne Neighbourhood Plan, adopted in 2025, identifies two opportunity sites in the town centre boundary for redevelopment, comprising:
- 1 **Phelps Parade**
 - 2 **Old Co-op Site**
- 5.69 The above sites have been excluded from this sequential assessment due to their small size and their inability to meet the tests to be appropriate / sequentially preferable for a David Lloyd new club (a site of at least 2 hectares (5 acres) to facilitate the whole development).
- 5.70 Figures 5.6 and 5.7 below, extracted from the draft Local Plan Review and draft Policies Map, highlights the adopted and draft town centre boundary and the Calne Conservation Area. Other heritage designations including the Grade I listed Church of St Mary in the town centre boundary and other Grade II and II* listed buildings, Registered Parks and Gardens and Scheduled Monuments which lie both within and at the edge of the town centre. Bowood Registered Park and Garden is Grade I listed and contains various listed buildings and is located out of centre to Calne town centre.

Figure 5.6 Calne Town Centre (adopted and draft)



Source: Wiltshire Local Plan Review (2023)

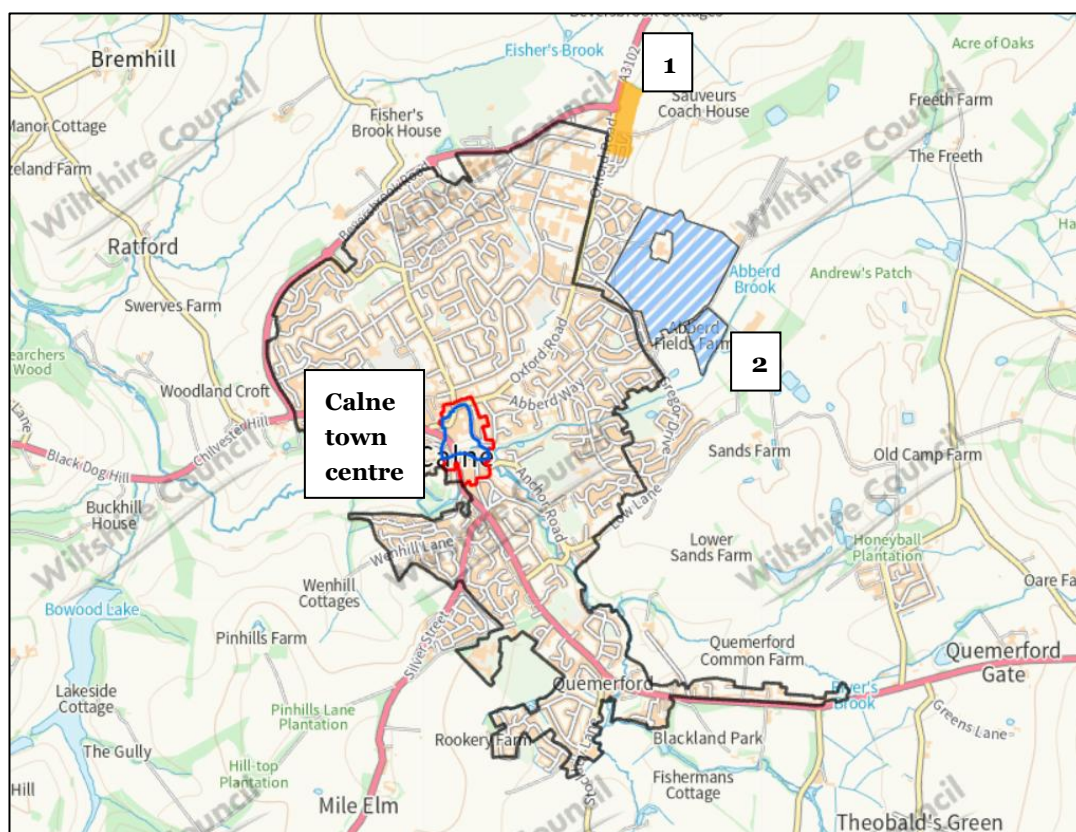
Figure 5.7 Calne Conservation Area (brown), Registered Parks and Gardens (green) and Scheduled Monuments (purple)



Source: Wiltshire Local Plan Review draft Policies Map (2023)

5.71 Based on the above, sequential sites have been reviewed and based on locations within each Calne market town centre and edge of centre in terms of their suitability, viability and availability to accommodate development. On this basis, the potential sequential sites have been identified below in Figure 5.8 with regards to their potential to accommodate development.

Figure 5.8 Potential Sequential Sites: Calne Market Town Centre



Source: Wiltshire Local Plan Review Draft Policies Map (2023), with Lichfields approx. mark-up of sequential sites

1. Land East of Beversbrook Farm and Porte Marsh Industrial Estate

5.72 The site is vacant undeveloped agricultural fields/greenfield land adjacent to the north of the settlement boundary in Calne.

5.73 Saved Policy BD1 of the North Wiltshire Local Plan, brought forward in Core Policy 8 of the adopted Core Strategy, allocates the site for business development (Use Classes B1, B2 and B8). This is brought forward in Policy 9 of the Wiltshire Local Plan Review comprising a site area of 4.4 ha, in line with the original saved policy.

5.74 An application was submitted by Lidl in December 2020 and approved by the Council on the site in February 2025 for “*phased development to comprise: erection of a Class E(a) retail store, car parking and servicing areas, access, landscaping and associated works (Phase I); and erection of 10 employment units for use within Classes E(g), B2 and/or B8, car parking and external areas, access, landscaping and associated works, including a balancing pond (Phase II)*” (ref: 21/00081/FUL).

- 5.75 In considering the suitability, viability and availability under the NPPF (2024) tests, we conclude:
- 5.76 **Suitability:** The site is not suitable for a David Lloyd Club, given the adopted allocation for business/employment uses, noting the extensive open space areas required for external playing areas / courts.
- 5.77 **Viability:** It is not clear whether a viable scheme could be delivered: we would suggest one could not be made viable, given the preference for the retail-led/employment development, versus the capital receipt likely from a David Lloyd Club.
- 5.78 **Availability:** The site is not available as it is being pursued for other interests including the Lidl retail/employment-led development approved by the Council in February 2025, in line with the policy intention.

2. Land off Spitfire Road

- 5.79 The site is undeveloped agricultural fields/greenfield land and is accessible to the town centre and connected to existing and planned residential development, as well as existing business clusters at Porte Marsh Industrial Estate.
- 5.80 Policy 10 of the Local Plan Review allocates the site for approximately 2.7 ha of employment uses (Use Classes B2, B8, E(g)(i-iii)). Figure 4.5 of the draft Local Plan provides a more detailed concept plan for the site and confirms that the site should provide approximate 0.5 ha of office and 2.7 ha industrial development as part of any future proposals.
- 5.81 In considering the suitability, viability and availability under the NPPF (2024) tests, we conclude:
- 5.82 **Suitability:** The site is not suitable for a David Lloyd Club, given the allocation as a traditional office / industrial development site of 2.7 ha in the draft Local Plan, notwithstanding the extensive open space areas required for external playing areas / courts.
- 5.83 **Viability:** It is not clear whether a viable scheme could be delivered: we would suggest one could not be made viable given the preference for office / industrial development, versus the capital receipt likely from a David Lloyd Club.
- 5.84 **Availability:** The site is understood to be vacant, but is allocated for other uses including the pursuit of office/industrial development, in line with the intention of the allocation in the Local Plan Review.

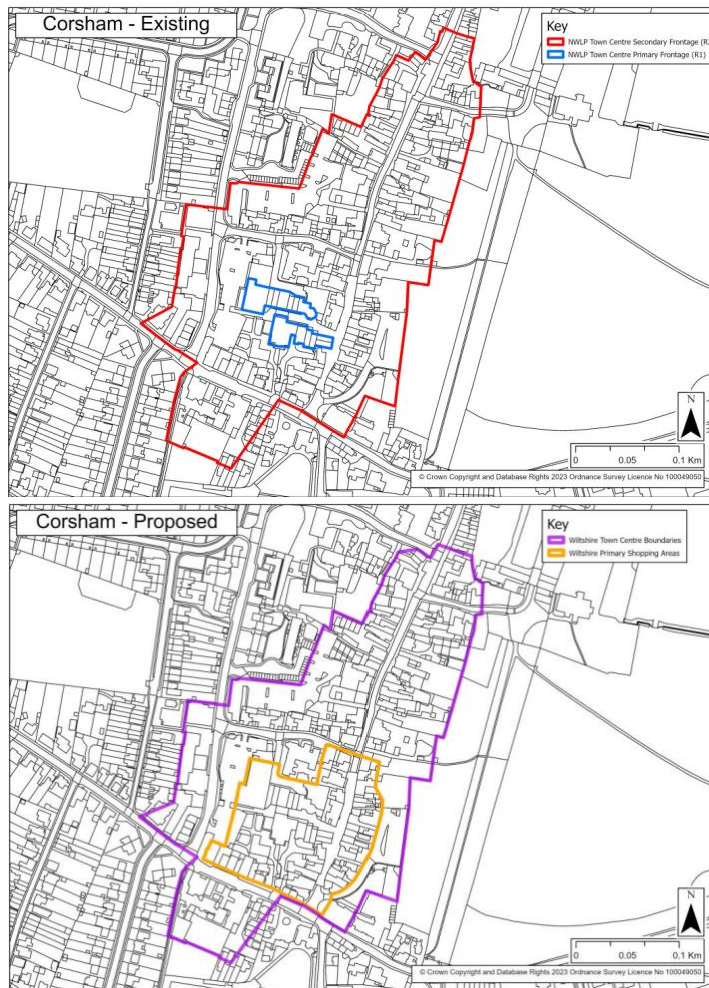
Summary – Calne Market Town Service Centre

- 5.85 Through our review and due to the presence of various listed buildings and location within Calne Conservation Area in the market town centre, it is considered that there is no site within the centre which would be suitable for the scale of development which David Lloyd requires for a new leisure club development (approx. 2 hectares).
- 5.86 Due to the predominantly residential and historic character of the town centre and adjacent area, there are also no edge of centre sites which would be considered appropriate or suitable for a new David Lloyd Club.

Potential Sequential Sites: Corsham Market Town Centre

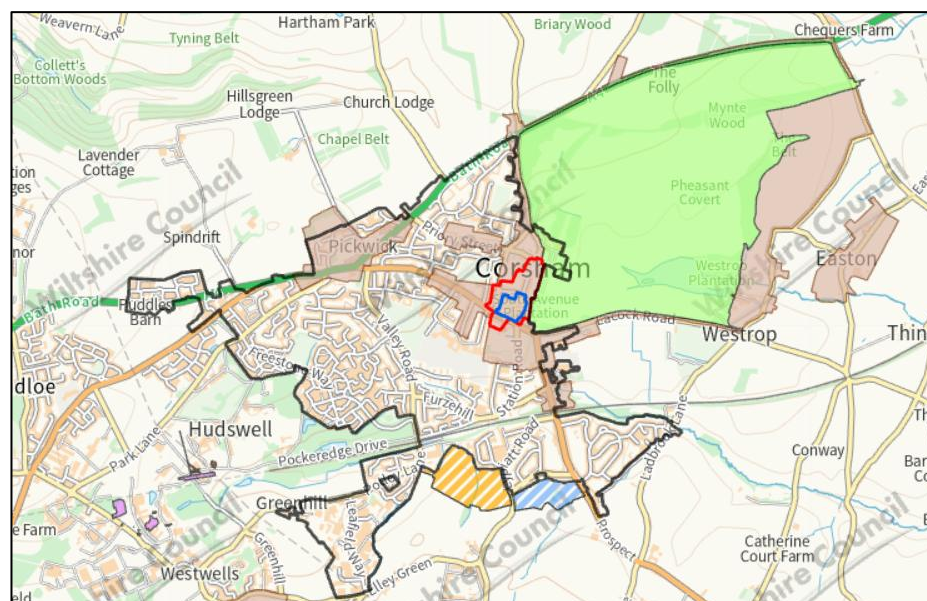
- 5.87 Corsham lies in close proximity to the west of Chippenham (approx. 6km) and includes MoD Corsham which has a large campus on the south-western edge of the town. The town centre in Corsham lies on the eastern edge of the settlement and comprises High Street and the Martingate Centre (a post-war pedestrianised shopping centre).
- 5.88 The adopted primary frontage is confined to the Martingate Centre, with the secondary frontage extending from the High Street from its junction with Pickwick Road in the south to its junction with Priory Street in the north. It also includes Post Office Lane, the southern part of Newlands Road and a small part of Pickwick Road.
- 5.89 The High Street is a narrow street with a one-way highway which is bordered on both sides by a series of two and three storey terraced buildings. The Martingate Centre is also an extension to the pedestrianised area, linking the southern end of High Street to the Coop food store and the surface level car park off Newlands Road.
- 5.90 Core Policy 11 of the adopted Core Strategy confirms that Corsham has not been identified as a location for new strategic employment growth and the out of centre Principal Employment Areas will be retained and supported in accordance with Core Policy 35: Leaffield Industrial Estate and Fiveways Trading Estate.
- 5.91 Policy 12 of the Local Plan Review provides new allocations for a total of 360 homes and a reserve site of approx. 200 dwellings, but does not allocate any land for other commercial or employment uses. The sites within this policy have been scoped out from this sequential assessment due to their allocation for residential development. The policy retains the out of centre Principal Employment Sites at Leaffield Industrial Estate and Five Ways Trading Estate, in accordance with Policy 65 (Existing employment land).
- 5.92 Policy CNP BE4 of the Corsham Neighbourhood Plan (2019) supports employment-related development which would revitalise the town centre in accordance with the Framework Masterplan. Proposals should seek opportunities to: enhance/remodel the Martingate Centre, integrate coach parking, develop a new supermarket (with mixed use opportunities), identify start-up employment within development proposals, remodel/enhance the town centre car parks, and create linkages between key commercial locations.
- 5.93 Figures 5.9 and 5.10 below, extracted from the draft Local Plan Review and draft Policies Map, highlights the adopted and draft town centre boundary located within the Corsham Conservation Area. Other heritage designations including Grade I, Grade II and II* listed buildings, including Corsham Court Grade II* Registered Park and Garden, are located within and adjacent to the town centre boundary. Pickwick Conservation Area is also located edge of centre and Neston Conservation Area and Gastard Conservation Area are situated in out of centre locations within the Corsham Civil Parish.
- 5.94 The Rural Green Buffer in Corsham, as identified in the Corsham Neighbourhood Plan, lies out of the town centre on the settlement boundary where Policy CNP E5 confirms that approval will not be given for the construction of new buildings which, individually or cumulatively, would lead to the coalescence of settlements.

Figure 5.9 Corsham Town Centre (adopted and draft)



Source: Wiltshire Local Plan Review (2023)

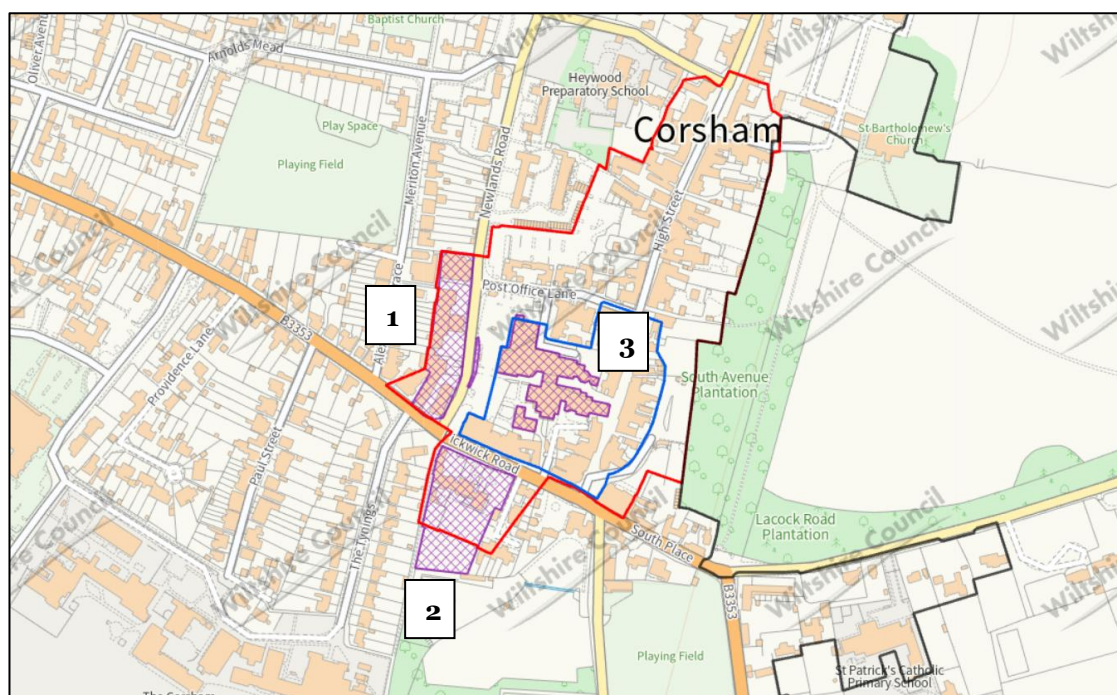
Figure 5.10 Corsham Conservation Area (brown), Registered Parks and Gardens (green) and Scheduled Monuments (pink)



Source: Wiltshire Local Plan Review draft Policies Map (2023)

- 5.95 Based on the above, sequential sites have been reviewed and based on locations within each Corsham market town centre and edge of centre in terms of their suitability, viability and availability to accommodate development. On this basis, the potential sequential sites have been identified below in Figure 5.11 with regards to their potential to accommodate development.

Figure 5.11 Potential Sequential Sites: Corsham Market Town Centre



Source: Wiltshire Local Plan Review Draft Policies Map (2023), with Lichfields approx. mark-up of sequential sites

1. Possible New Supermarket area

- 5.96 The site comprises a mix of uses and properties within the adopted and draft town centre boundary including a Royal British Legion club, a tyre service shop / garage, MOT test centre, the Corsham Club and Abacus House (Class E medical uses and retail units).
- 5.97 Policy CNP BE4 of the Corsham Neighbourhood Plan outlines that opportunities will be supported on the site to develop a second supermarket/additional retail provision in the town centre with mixed-use opportunities and associated infrastructure.
- 5.98 In considering the suitability, viability and availability under the NPPF (2024) tests, we conclude:
- 5.99 **Suitability:** The site is not suitable for a David Lloyd Club, given the allocation as a dedicated supermarket site in the draft Local Plan, as well as the extensive open space areas required for external playing areas / courts.
- 5.100 **Viability:** It is not clear whether a viable scheme could be delivered: we would suggest one could not be made viable given the preference for a supermarket/retail development, versus the capital receipt likely from a David Lloyd Club.

- 5.101 **Availability:** The site is not available as it is understood to be currently occupied by the uses listed above and is allocated for other uses including retail led development, in line with the intention of the allocation in the Corsham Neighbourhood Plan.

2. Business Start-Up area

- 5.102 The site comprises a Grade II Listed Building and former Corsham Library. The building was vacant and was formerly used for library services, youth centre and commercial uses.
- 5.103 Policy CNP BE4 outlines that proposals will be supported on the site for the development of start-up business employment uses within the town centre location.
- 5.104 Planning permission was granted on the site in May 2017 to “*demolish single-storey Library, new two-storey extension & selective demolition of single-storey elements of the Mansion House, new single-storey entrance lobby, external parking areas, access road, landscaping and waste & recycling compound*” (ref: 16/11304/DP4). An associated listed building consent was granted by the Secretary of State in July 2017 (ref: 16/11410/LBC and ref: PCU/LBC/Y3940/77770).
- 5.105 In 2014, the library closed and was demolished and was replaced in 2019 by a modern entrance giving access to the Mansion House and transformation into the Corsham Digital Mansion, a co-working/office environment aimed at start-up businesses.
- 5.106 In considering the suitability, viability and availability under the NPPF (2024) tests, we conclude:
- 5.107 **Suitability:** The site is not suitable for a David Lloyd Club, given the allocation as a business start-up site in the draft Local Plan, the heritage constraints and noting the extensive open space areas required for external playing areas / courts.
- 5.108 **Viability:** It is not clear whether a viable scheme could be delivered: we would suggest one could not be made viable given the preference for ‘business/start-up’ development, versus the capital receipt likely from a David Lloyd Club.
- 5.109 **Availability:** The site is not available as it is currently occupied by Corsham Digital Mansion and is allocated for other uses including business/start-up development, in line with the intention of the allocation in the Corsham Neighbourhood Plan.

3. Martingate Centre

- 5.110 The site is a key commercial area comprising a selection of approx. 20 historic (including Grade II listed buildings) and refurbished properties within Corsham town centre.
- 5.111 Policy 12 of the Local Plan Review encourages development to regenerate and revitalise Corsham town centre and specifically references the Martingate Centre.
- 5.112 Policy CNP BE4 outlines that proposals will be supported on the site to enhance and remodel the Martingate Centre within the town centre location and the new primary shopping area.
- 5.113 Planning permission and listed building consent were granted on part of the site in March 2024 for the “*change of use from Bank to boutique hotel with ancillary brasserie style restaurant and retail wine merchant at ground floor, including additional new*

accommodation at the rear of the building for kitchen and plant rooms, demolition of more recent elements and minor alterations to interior and exterior, together with the remodelling of stone boundary wall and adjacent access stair from service yard at rear to 1st floor flats of the Martingate Centre also integrating a new enclosure to conceal refuse bins, and the installation of a PV panel array at flat roof over ground and south facing pitched roof over 1st floors of the Martingate Centre with battery energy storage for the onsite generated electricity” (refs: PL/2022/09459 & PL/2022/09717).

5.114 In considering the suitability, viability and availability under the NPPF (2024) tests, we conclude:

5.115 **Suitability:** The site is not suitable for a David Lloyd Club, given the allocation to refurbish and retain the existing shopping centre in the draft Local Plan, notwithstanding the extensive open space areas required for external playing areas / courts.

5.116 **Viability:** It is not clear whether a viable scheme could be delivered: we would suggest one could not be made viable given the preference for the refurbishment of the existing shopping centre development, versus the capital receipt likely from a David Lloyd Club.

5.117 **Availability:** The site is not available as it is currently occupied by the existing shopping centre which is allocated for enhancement/retention and further retail/hotel development has recently been approved on the site, in line with the intention of the allocation in the Corsham Neighbourhood Plan.

Summary – Corsham Market Town Service Centre

5.118 Through our review and due to the presence of various listed buildings and location within Corsham Conservation Area in the market town centre and adjacent, it is considered that there is no site within the centre which would be suitable for the scale of development which David Lloyd requires for a new leisure club development (approx. 2 hectares).

5.119 Due to the predominantly residential and historic character and designations of the town centre and adjacent area, there are also no edge of centre sites which would be considered appropriate or suitable for a new David Lloyd Club.

Potential Sequential Sites: Melksham Market Town Centre

5.120 Melksham is a market town situated on the banks of the River Avon approx. 4.5 miles northeast of Trowbridge and 6 miles to the south of Chippenham.

5.121 The adopted primary shopping area is predominantly formed of Bank and High Street, stretching north to south, with the inclusion of parts of Lowbourne and Church St. The commercial area stretches out further until the River Avon to the north-west and extends to King Street in the south.

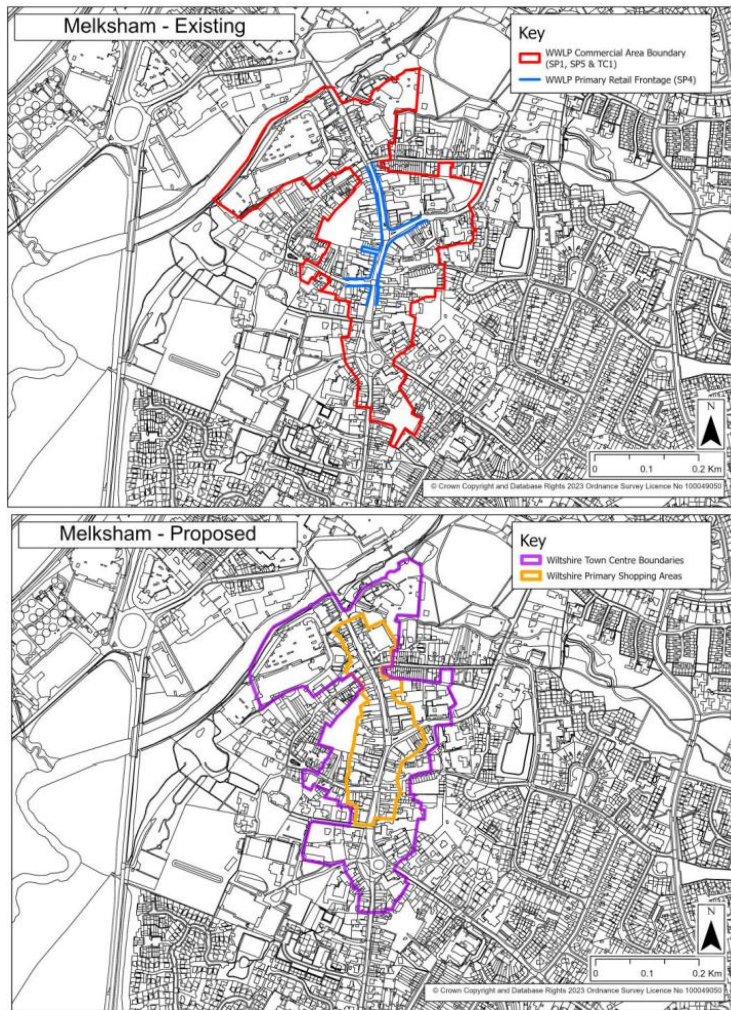
5.122 Melksham town centre is comprised of a range of pre-war and post-war traditional building types, generally of between two to three storeys. The majority of buildings are pre-war terraced properties which highlight the historic urban form of the centre.

5.123 The area within the adopted and draft town centre boundaries and primary shopping area are located within Melksham Conservation Area. There are also a number of Grade II and Grade II* listed buildings within Melksham town centre on Bank Street/High Street in the

primary shopping area. The Grade II* listed St Michael's Church and Grade II Listed 'The Grange' are also located at the edge of the town centre.

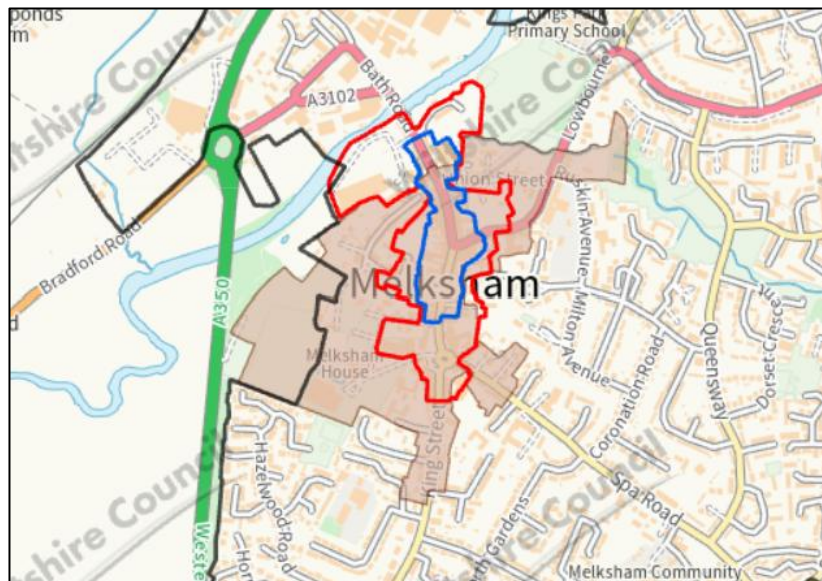
- 5.124 Core Policy 15 of the adopted Core Strategy confirms that over the plan period (2006 to 2026) up to 6 ha of new employment land will be provided at Hampton Business Park (Saved West Wiltshire District Plan).
- 5.125 Policy 17 of the Local Plan Review outlines the key criteria for development in Melksham and confirms that over the plan period (2020 to 2038) approximately 2,160 homes and 5 ha of employment land will be provided at Melksham, including 5 ha of employment land on Land East of Melksham alongside approx. 425 homes (discussed in Policy 18).
- 5.126 Policy 17 also confirms that the remaining employment land on the existing allocation at Hampton Business Park will also be provided. The Park is an out of centre established commercial, office and industrial estate comprising B1/B2/B8 and Class E uses and has therefore been scoped out of the sequential assessment.
- 5.127 Policy 19 (Land off Bath Road, Melksham) and Policy 20 (Land North of the A3102, Melksham) are allocated for both residential development and employment development. However, the employment elements are specifically secured for the expansion of Melksham Oak Academy (Policy 19) and 0.4 ha of land for a 100 place nursery (Policy 20) and have therefore both been excluded from this sequential assessment.
- 5.128 Figures 5.12 and 5.13 below, extracted from the draft Local Plan Review and draft Policies Map, highlights the adopted and draft town centre boundary located fully within the Melksham Conservation Area.

Figure 5.12 Melksham Town Centre (adopted and draft)



Source: Wiltshire Local Plan Review (2023)

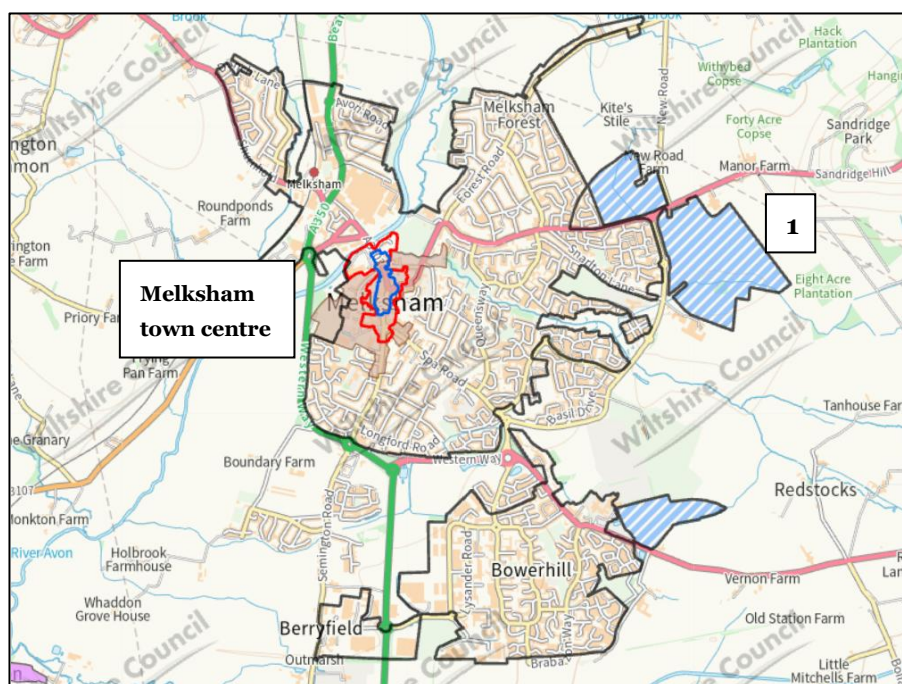
Figure 5.13 Melksham Conservation Area (brown)



Source: Wiltshire Local Plan Review draft Policies Map (2023)

- 5.129 Based on the above, sequential sites have been reviewed and based on locations within each Melksham market town centre and edge of centre in terms of their suitability, viability and availability to accommodate development. On this basis, one potential sequential site has been identified below in Figure 5.14 with regards to its potential to accommodate development.

Figure 5.14 Potential Sequential Sites: Melksham Market Town Centre



Source: Wiltshire Local Plan Review Draft Policies Map (2023), with Lichfields approx. mark-up of sequential sites

1. Land East of Melksham

- 5.130 The site comprises agricultural fields and greenfield land on the eastern outskirts of the settlement boundary of Melksham.
- 5.131 Policy 18 of the Local Plan Review confirms that the site is allocated for the development of 425 dwellings and 5 ha of employment land, a primary school with nursery provision and local retail /service centre with large swathes of green spaces to accommodate a range of children's play areas, public open space and allotments.
- 5.132 Figure 4.12 of the Local Plan Review provides a recommended concept plan for the strategic allocation and confirms that the 5 ha employment area could be located in the south western corner of the allocation boundary, with a 1 ha local centre situated in the centre of the allocation.
- 5.133 It is noted that employment land is defined in the adopted Core Strategy and emerging Wiltshire Local Plan Review and its evidence base¹⁰ as use classes E(g), B2, and B8, excluding the proposed uses of a new David Lloyd Club.
- 5.134 Outline planning permission (relating to access) was granted by the Council on the site in May 2025 for the *“demolition of agricultural buildings and development of up to 500*

¹⁰ Wiltshire Employment Land Review Update, prepared by Hardisty Jones Associates, September 2023

dwelling; up to 5,000 square metres of employment (class E(g)(i)) & class E(g)(ii)); land for primary school (class F1); land for mixed-use hub (class E / class F); open space; provision of access infrastructure from Sandridge Common (A3102); and provision of all associated infrastructure necessary to facilitate the development of the site” (ref: PL/2023/11188).

5.135 In considering the suitability, viability and availability under the NPPF (2024) tests, we conclude:

5.136 **Suitability:** The site is not suitable for a David Lloyd Club, given the strategic residential-led allocation and its associated uses in the draft Local Plan, noting the extensive open space areas required for external playing areas / courts.

5.137 **Viability:** It is not clear whether a viable scheme could be delivered: we would suggest one could not be made viable given the preference for residential-led development, versus the capital receipt likely from a David Lloyd Club.

5.138 **Availability:** The site is not available as residential-led development is being pursued and has recently been approved on the site in May 2025 by the Council, in line with the intention of the allocation in the Wiltshire Local Plan Review.

Summary – Melksham Market Town Service Centre

5.139 Through our review and due to the presence of various listed buildings and location within Melksham Conservation Area in the market town centre, it is considered that there is no site within the centre which would be suitable for the scale of development which David Lloyd requires for a new leisure club development (approx. 2 hectares).

5.140 Due to the predominantly residential and historic character and designations of the town centre and adjacent area, there are also no edge of centre sites which would be considered appropriate or suitable for a new David Lloyd Club.

Summary

5.141 As required by the NPPF, David Lloyd has been flexible on issues such as format and scale. However, the proposals would not be suitable, viable or available on any of the allocated or sites outlined within the Council’s Local Plan and retail and leisure evidence base.

5.142 There is no firm basis in the NPPF or the NPPG for disaggregating a proposal for main town centre uses and there is also no realistic prospect of the development being delivered at any of the town centre locations identified in Wiltshire Council’s Development Plan.

5.143 There are no alternative sites that are available or suitable for the site-specific need identified and, as such, the sequential test is passed.

6.0 Leisure Impact Assessment

- 6.1 This section reviews the impact of sites on the vitality and viability of centres in the development plan.
- 6.2 As noted earlier, within adopted Core Policy 38, the local threshold for proposals to provide a retail and leisure impact assessments is 200 sqm. This is carried forward in Policy 67 in the Local Plan Review. As the Site provides over this amount of gross floorspace, this section considers an assessment of the leisure impact of the David Lloyd proposals.
- 6.3 Paragraph 94 of the NPPF (2024) sets out that the assessment of impact should consider:
- a *the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and*
 - b *the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider catchment (as applicable to the scale and nature of the scheme).*
- 6.4 Main town centres uses are defined in the glossary of the NPPF as “*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)*”.
- 6.5 It is pertinent to note, there is limited provision within the main town centres for the ‘leisure’ main town centre uses, including tennis and other sporting facilities, as set out below:
- Within **Chippenham**, there are some/limited gyms and health and fitness facilities located within the town centre itself, including Pure Gym and Fitness Formula, located in the retail park to the north of the train station, Inspire Fitness, Snap Fitness Chippenham, Anytime Fitness Chippenham and CrossFit Monarch Borough Parade.
 - Chippenham Park Bowling Club, Chippenham Park Tennis Club, Chippenham Cricket Club, Chippenham Town Football Club, Chippenham Hockey Club and Chippenham Netball Club are all located either at edge or out of centre boundary. Chippenham Rugby and Allington Cricket Club are located on the outskirts outside the settlement boundary to the west and in an out of centre location. Stanley Park Sports Ground is in an out of centre location and is owned by Chippenham Town Council, providing 3G pitches and grass football pitches. The North Wilts Indoor Bowls Club is also out of centre and is situated adjacent to the Bath Road Industrial Estate on the southern edge of the settlement boundary.
 - It is noted that Olympiad Leisure Centre at Sadlers Mead sits within the town centre boundary. As the Leisure Centre is a Council owned and offers reduced/concession rates and pay as you go memberships, it is considered to attract a different target audience and would therefore not be impacted by the proposed development by David Lloyd.

- In **Calne**, there are no sport or health and fitness facilities located within the town centre boundary. Calne Recreation Club / Calne Bowls Club at Calne Recreation Ground are located at edge of centre to the Calne town centre. St Mary's Calne Sports Club comprising a fitness centre/gym, swimming pool, sports hall and climbing wall and dance studio is also located edge of centre, to the north west of the town centre boundary.
- Blackland Lakes Health Club, part of the Blackland Lakes Campsite and Fishing Lakes, is located outside the settlement boundary and is an out of centre location. The health club provides a gym, swimming and sauna facilities as well as group fitness classes and an onsite café.
- LPB Fitness 24hr Gym, Hitsona Calne, Fitness Box Calne gym, CrossFit Calne, TT Fitness Hub - 24/7 and Pheeb's Pole Fit dance school are all located out of centre within the industrial area on the northern boundary of the Calne settlement boundary.
- Beversbrook Sports and Community Facility, Calne Tennis Club, Calne Short Mat Bowls Club, FC Wiltshire Football Development Centre, Calne Running Club, Sweaty Mama North Wiltshire fitness centre are all located out of centre and outside the settlement boundary to the north of the A3102 Beversbrook Road.
 - It is noted that Calne Leisure Centre sits within the southern edge of the Calne settlement boundary in an out of centre location. As the Leisure Centre is a Council owned and offers reduced/concession rates and pay as you go memberships, it is considered to attract a different target audience and would therefore not be impacted by the proposed development by David Lloyd.
- Within **Corsham**, there are only a few sport / health and fitness facilities within the town centre boundary, including Pilates Sunshine Pilates studio, Yoga tree Yoga studio, Precision Pilates Mat Studio and Precision Pilates Reformer Studio.
- Corsham Hockey Club, Corsham BMX Track, Corsham Skateboard Park, Corsham Badminton Club are located within central Corsham and are considered to be in an out of centre location.
- First Step GB LTD fitness centre, Marin UK Sports club and Corsham Gymnastics Academy are located in the Leafield Industrial Estate on the southern boundary of the settlement boundary and at out of centre locations.
 - It is noted that Springfield Community Campus sits within the centre the Corsham settlement boundary in an edge of centre location. As the Leisure Centre is a Council owned and offers reduced/concession rates and pay as you go memberships, it is considered to attract a different target audience and would therefore not be impacted by the proposed development by David Lloyd.
- In **Melksham**, Aztec Fitness Rooms gym is located within the town centre boundary, however this appears currently to be temporarily closed. Melksham Blue Pool is also located within the town centre boundary, however this site is permanently closed according to Wiltshire's Council website.
- The Pilates & Movement Studio is located at edge of centre to the Melksham town centre on W End. Melksham Cricket Club and Melksham Tennis Club are also situated in an edge of centre location, to the west of the town centre boundary.

- On the Block Training Boxing club, Dragons Lair mixed martial arts club, Pole-Da-Cise Pole Dance Fitness Wiltshire dance school and Spencers Bowls Club are all located at edge of centre to the north of the town centre boundary on the other side of the River Avon.
- The following facilities are located at the southern tip of the Melksham boundary in Bowerhill and in out of centre locations: CrossFit Civitas fitness centre, Your Tae Kwon-Do (TKD & Self Defence Training) Tae Kwon do school, Gracie Barra Melksham Brazilian Jiu-Jitsu & kickboxing martial arts school, Invictus Fitness, Wiltshire School of Gymnastics and Future of Football club.
 - It is noted that Melksham Community Campus sits within the centre of Melksham in an edge of centre location. As the Leisure Centre is a Council owned and offers reduced/concession rates and pay as you go memberships, it is considered to attract a different target audience and would therefore not be impacted by the proposed development by David Lloyd.

6.6 With regards to 'out of centre' leisure destinations near the application site, there are some situated within the wider area in Chippenham, including Chippenham Golf Club located just outside the northern edge of the settlement boundary and Bowood House & Gardens on the outskirts of both Chippenham and Calne. However, these are both located in 'out of centre' locations and the NPPF (2024) is clear that the assessment of impact falls to those businesses within a town or other centre location only.

6.7 To note, the proposals are also unlikely to affect the provision of markedly distinct other leisure uses (e.g. cinemas, restaurants or small-scale retail) or the provision of residential development for those seeking to invest in the town centres, in line with the adopted and emerging site and strategic allocations.

6.8 In summary, our review has confirmed that the sites above offer a very limited scope of health and fitness activities and would not be comparative in size and scale to David Lloyd health and fitness clubs. These sites are generally unlikely to be impacted by the David Lloyd proposals due to their small-scale nature and specialised services that they offer in the designated town centres. Coupled with the nature of a David Lloyd Club, which pulls from a wide area and this lack of rival town centre facilities, suggests there will be little, if any impact arising from the proposals, either individually, or cumulatively.

6.9 Moreover, whilst the 'need' for a development is not part of the test of impact, clearly any impact needs to be weighed against existing provision, capacity and in some cases paucity of uses within a catchment area. The sequential exercise, undertaken separately, concludes that there are no more preferable town centre options to meet such a requirement.

6.10 Furthermore, the Wiltshire Retail and Town Centres Study (2020) confirms that Chippenham is a healthy town centre, which has been able to adapt to the on-going trends facing the UK retail sector and also the significant changes in out of centre floorspace in the town. The town centre has seen falling vacant retail units alongside changes to the comparison goods and service sectors, which have mirrored the national trends. It is noted that in terms of new town centre redevelopment opportunities, the Bath Road car park and adjacent Bridge Centre site remain the most obvious opportunity to introduce new land uses into the town centre.

- 6.11 The Study notes, from the findings of the household survey on the usage of health and fitness facilities in Chippenham, that the most popular facility amongst residents is the Olympiad Leisure Centre at Sadlers Mead. This has a 54% of all trips from those residents in the study area that use health and fitness facilities and provides a wide offer including a gym, swimming pool, sports hall and spaces for various types of fitness classes. It is also notable that 22% of local residents also use the Springfield Leisure Centre in Corsham. The Olympiad Leisure Centre has a limited draw beyond the Chippenham study area, with 8% of trips from Corsham residents and 3% of trips from Calne residents.
- 6.12 The Study also confirms that Calne is considered to be a town centre with a localised retail function whose catchment is influenced by the nearby higher order centre of Chippenham and Corsham is one of the smaller main town centres in Wiltshire and performs a localised retail and service function. Melksham is seen to have a limited shopping catchment due to its location close proximity and relationship to Chippenham and Trowbridge, particularly in relation to comparison goods shopping.
- 6.13 The Retail & Town Centres Position Statement (2025) concludes that alongside the focus on town centre needs, part of the overall retail and leisure expenditure growth (and quantitative capacity) within the main settlements is associated with strategic residential-led land allocations. As a consequence, and also taking into account locationally-specific qualitative needs, it is appropriate that part of the overall identify need is focused upon planning permissions for new local / neighbourhood centres within these draft Local Plan allocations.
- 6.14 Additionally, the planned future investment in Chippenham town centre, including the allocation at Bath Road Car Park and Bridge Centre and the approved plans for the Emery Gate shopping centre redevelopment, will not be impacted by these proposals as they relate to distinctive residential and retail-led development which would not conflict with a premium health and fitness facilities proposed as part of this application.
- 6.15 Therefore, the evidence base confirms that the proposed David Lloyd will meet an identified need within the wider area, being located on a strategic allocation, and provide choice and competition within the wider catchment area and will not have an impact on the vitality and viability of the adopted town centres as a whole (including retail, service, office and other uses).
- 6.16 Taking account of genuinely available opportunities within the town centres, alongside the paucity of existing comparative health and fitness uses, it is difficult to establish that any impact will arise to either the vitality and viability of the town centres, or any proposed investment in health and fitness within the town to evoke paragraph 94 of the NPPF (2024).

7.0 Health Impact Assessment

7.1 The NHS has set out, as part of its Healthy Urban Development Unit¹¹ a 'Healthy Urban Planning Checklist' to assess the health and wellbeing characteristics of development proposals on a 'Health Impact basis'.

7.2 This checklist supports, inter alia:

'Planning officers, to help identify and address the health impacts of plans and development proposals'¹²

7.3 The David Lloyd Club in Chippenham will have direct health benefits and impact on both physical and mental health.

7.4 Broadly, there will be a cumulative positive and long term impact for users of the new leisure centre ranging from the immediate positive health impacts of exercise on reducing stress and anxiety to long term physiological impact, such as reduced blood pressure, improved cardio-respiratory fitness and improved/maintenance of a healthy body-weight.

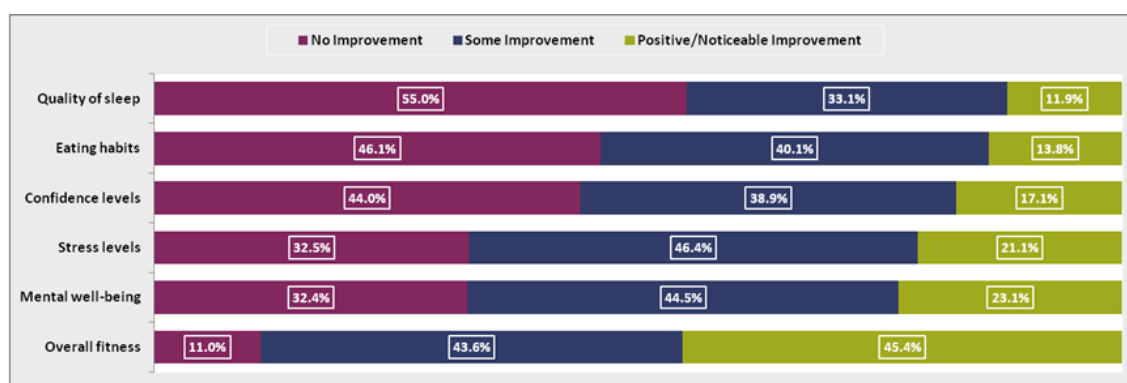
7.5 Physical inactivity is one of the major risk factors causing death and ill-health. The risks of lifestyle diseases such as coronary heart disease (CHD), stroke and type II diabetes are markedly raised in people who are less physically active.

7.6 Physical inactivity is directly linked with an increased cost to the NHS and wider cost to the society, including absence from work, premature deaths lack in productive work from individuals.

7.7 David Lloyd has undertaken its own assessment of the benefits of exercise and wellbeing from members in its clubs¹³.

7.8 These results show the meaningful impact a David Lloyd Club Membership has to health and wellbeing are displayed below.

Figure 7.1



Source: David Lloyd (July 2019)

7.9 Notably,

¹¹ Initially for London, but similar principles can be applied outside London

¹² Healthy Urban Planning Checklist p.

¹³ July 2019

- Almost 90% of members considered they benefitted from an enhancement to overall fitness levels;
- Almost 70% considered membership effected an improvement to mental health;
- Almost 70% found being a Member reduced stress levels;
- Over half considered Membership resulted in healthier eating habits;
- Over half considered it led to greater confidence; and
- Just under half noted Membership resulted in better quality of sleep.

7.10 This shows the positive benefit of a David Lloyd Club not only to physical fitness, but also health and wellbeing.

7.11 Set against this assessment, key Themes identified in the NHS checklist are further assessed below:

NHS Health Impact Checklist

Theme 1: Housing

7.12 Not applicable – the proposal is for commercial development.

Theme 2: Active Travel

7.13 ***Does the proposal promote cycling and walking through measures in a travel plan, including adequate cycle parking and cycle storage?***

- Yes – the proposals provide 30 cycle spaces in accordance with a cycle demand assessment which has been undertaken; and
- Yes - a Travel Plan has been submitted alongside this planning application which promotes cycling and walking as a form of access to the development.

7.14 ***Does the proposal include traffic management and calming measures and safe and well-lit pedestrian and cycle crossings and routes?***

- Yes - the proposals seek to connect with surrounding areas and the wider development in the strategic residential and employment allocation and Chippenham.

7.15 ***Does the proposal connect public realm and internal routes to local and strategic cycle and walking networks and public transport?***

- As above.

7.16 ***Does the proposal seek to minimise car use by reducing car parking provision, supported by the controlled parking zones, car free development and car clubs?***

- Yes - parking provision is minimum required for operational efficiency and to prevent fly-parking on surrounding road / residential networks;
- Yes – parking for the David Lloyd will be controlled for members only; and
- The proposals are also subject to a Travel Plan which explores initiatives to reduce travel by private car.

Theme 3: Healthy Environment

7.17 ***Does the proposal minimise construction impacts such as dust, noise, vibration and odours?***

- Yes - the proposals will be subject to a CEMP which will require agreement prior to commencement of development.

7.18 ***Does the proposal minimise air pollution caused by traffic and energy facilities?***

- Yes: through a Travel Plan for transport which is submitted alongside this planning application; and
- Yes: through the use of Green Energy (PV panels and air source heat pumps).

7.19 ***Does the proposal minimise the impact of noise caused by traffic and commercial uses through insulation, site layout and landscaping?***

- Yes: the proposals are insulated against excessive external noise and also from plant and machinery on site. It is envisaged that there will be suitable noise conditions as part of any approval;
- Yes: the Site is set out with the David Lloyd building positioned centrally in the Site, away from any main roads; and
- Yes: the Site is proposed to be heavily landscaped and the proposed landscaping strategy seeks to further enhance privacy and acoustics.

7.20 ***Does the proposal retain or replace existing open space and in areas of deficiency, provide new open or natural space, or improve access to existing spaces?***

- The proposal does not involve the loss of existing open space, and is already allocated for development; and
- The proposals link and provide access to the wider area, and the areas of open/green space within it.

7.21 ***Does the proposal set out how new open space will be managed and maintained?***

- Not applicable: see above.

7.22 ***Does the proposal provide a range of play spaces for children and young people?***

- Yes - the David Lloyd Club provides formal and informal play space for children across tennis/swimming/fitness and internal child friendly facilities. There are also active coaching programmes for tennis and swimming specifically targeted towards children.

7.23 ***Does the proposal contribute to nature conservation and biodiversity?***

- Yes: the proposals are supported by an Ecological Appraisal and BNG Assessment which confirms that local and national policy has been met regarding the protection of wildlife and species; and
- Yes: the landscaping and ecology assessment is proposing native planting.

7.24 ***Does the proposal provide opportunities for food growing, for example by providing allotments, private and community gardens and green roofs?***

- No.

7.25 ***Does the proposal reduce surface water flood risk through sustainable urban drainage techniques, including storing rainwater, use of permeable surfaces and green roofs?***

- The proposal is supported by a Flood Risk Assessment and Drainage Assessment, including a SUDS Assessment, which outlines the surface water flooding strategy and confirms that the use of sustainable urban drainage techniques will be implemented.

7.26 ***Does the design of buildings and spaces avoid internal and external overheating, through use of passive cooling techniques and urban greening?***

- Yes: design and materials seek to minimise overheating which achieving insulation and reducing energy consumption; and
- Yes: the proposals contain significant landscaping to 'green' the development.

Theme 4: Vibrant Neighbourhoods

7.27 ***Has the impact on healthcare services been addressed?***

- The proposals is for health and fitness, and will assist in enhancing both physical fitness and health and wellbeing resilience across all ages; and
- The proposals will therefore have a positive effect on healthcare service provision.

7.28 ***Has the impact on primary, secondary and post-19 education been addressed?***

- Not applicable.

7.29 ***Does the proposal contribute to new social infrastructure provision that is accessible, affordable and timely?***

- The David Lloyd is accessible, affordable and meets some of the shortfalls identified in the Borough for sports and tennis provision.

7.30 ***Have opportunities for multi-use and the colocation of services been explored?***

- The proposal is for a sport-orientated, multi-use facility.

7.31 ***Does the proposal include commercial uses and provide opportunities for local employment and training, including temporary construction and permanent 'end-use' jobs?***

- Yes: it is anticipated that a number of the jobs, both permanent and temporary will be available locally and will be advertised as such.

- 7.32 ***Does the proposal promote the health and wellbeing of future employees by achieving BREEAM health and wellbeing credits?***
- A BREEAM Report and Pre-Assessment has been provided as part of the submission documents to demonstrate future compliance with the BREEAM credits. The Energy Strategy and BREEAM Travel Plan also outline how the proposals will promote the health and wellbeing of any future employees.
- 7.33 ***Does the proposal provide opportunities for local food shops?***
- No.
- 7.34 ***Does the proposal avoid an over concentration or clustering of hot food takeaways in the local area?***
- Not applicable.
- 7.35 ***Does the design of the public realm maximise opportunities for social interaction and connect the proposal with neighbouring communities?***
- The proposals links with key pedestrian routes on the wider part of the Site, which in turn provides access to the resident communities and nearby businesses.
- 7.36 ***Does the proposal allow people with mobility problems or a disability to access buildings and places?***
- Yes: the proposals will be fully DDA compliant.
- 7.37 The assessment-checklist above, which considers the work undertaken by David Lloyd, alongside a comparison of the proposals against the key indices of the NHS Health Assessment criteria, clearly show that there will be health benefits arising from the development.

8.0 Conclusion

- 8.1 Lichfields have been asked to prepare a Leisure and Health Impact Assessment and Sequential Assessment in support of the proposals submitted to Wiltshire Council at Southpoint Business Park (Plot 100), A350 West Cepen Way / N4528 Patterdown, Chippenham, SN15 2NU.
- 8.2 The proposals for the health, fitness and racquets club comprise the David Lloyd building and external activity areas. Overall, the facilities include 3 no. weather protected tennis courts, 3 no. padel courts with canopies, 1 no. Multi-use court, 1 no. Battle Box facility, indoor and outdoor swimming pools, 2 court sports hall, gym and studio facilities, spa facilities, child activity area, lounge and food and drink uses, terrace area, together with ancillary facilities, car and cycle parking, servicing, landscaping and associated works.
- 8.3 The evidence base which supports the development plan confirms that the existing centres cannot currently accommodate any further development. The proposals will therefore meet an identified need within the wider area and provide choice and competition within the wider catchment area.
- 8.4 With regards to the sequential test, as required by the NPPF (2024), David Lloyd has been flexible on issues such as format and scale. The proposals would not be suitable, viable or available on any of the allocated or recommended sites outlined within the Council's adopted or emerging Local Plan and retail and leisure evidence base. There is no firm basis in the NPPF (2024) or the NPPG for disaggregating a proposal for main town centre uses and there is also no realistic prospect of the development being delivered at any of the town centre locations identified in Wiltshire Council's Development Plan.
- 8.5 As there are no alternative sites that are available or suitable for the site-specific need identified and, as such, the sequential test is passed.
- 8.6 Furthermore, it is not considered that there any impacts will arise to either the vitality and viability of the designated town centres itself, or any proposed investment in health and fitness within the town to evoke paragraph 94 of the NPPF (2024).
- 8.7 Undertaking a Health Impact Assessment using the NHS 'Healthy Urban Planning Checklist' to assess the health and wellbeing characteristics of development proposals on a 'Health Impact Basis' shows that there will be a positive effect arising from the development of a David Lloyd Club. This is also supported by work which David Lloyd has undertaken to examine the positive benefits across a range of health and wellbeing criteria arising from a David Lloyd membership.
- 8.8 If you have any queries, please do not hesitate to contact Ian Anderson - Ian.anderson@lichfields.uk or Ollie Collins – ollie.collins@lichfields.uk in the first instance.