

SEQUENTIAL TEST REPORT

for

MEADOWBROOK (Wiltshire) CIC,
211 WOODROW ROAD,
MELKSHAM,
WILTS
SN12 7RD

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1. Introduction

This Sequential Test Report has been prepared on behalf of Meadowbrook (Wiltshire) CIC to support a pre-application request for development proposals at 211, Woodrow Road, Melksham, SN12 7RD.

This pre-application follows a full planning application submission that was validated on 18th July 2025 (ref. PL/2025/06078). During determination of the application, the case officer and the applicant agreed that the application would be “paused” and a pre-application request would be submitted to consider the issue of flood risk before the application proceeds to be determined.

Scope of this Report

The case officer has provided advice to assist with scoping of this Sequential Test report. This confirmed that the level of detail should be proportionate to the nature of the proposal. It also advised that zoning of activities by the vulnerability classifications of the proposed uses should be considered.

It is also noted that a proportionate Flood Risk Assessment is required to accompany any application re-submission.

This report is therefore structured as follows:

- Section 2 describes the site, its flood risk and the context to the development proposals;
- Section 3 sets out the planning policy context;
- Section 4 overviews the methodology followed to carry out the sequential test;
- Section 5 analyses alternative sites;
- Section 6 concludes the report.

2. Background and Site Description

Background to Meadowbrook

Meadowbrook is a not-for-profit social enterprise located in Wiltshire. As a Community Interest Company (CIC), they provide a nurturing outdoor space for therapeutic activities such as gardening, creative workshops, and yoga. Their mission is to support individuals experiencing mental and physical health challenges, as well as those struggling with social isolation.

The full planning application includes elements that are retrospective and the CIC has been undertaking some activities that already support beneficiaries within Melksham. The two Directors at Meadowbrook purchased the land at Melksham solely for the purpose of running a Not-for-Profit. This approach means that the CIC does not have any prohibitive monthly rental costs that are outside of their control and ensures the long-term security of the project.

The core activities on the site are guided by four overarching concepts: gathering, growing, creating and moving. Such activities are varied and include (but not limited to):

- Growing plants, vegetables and an orchard in a dedicated growing space;
- Coming together for storytelling, poetry, music and talks in indoor and outdoor areas;
- Working with the land to improve biodiversity and create gardens and natural spaces;
- Indoor and outdoor creative art sessions and workshops;
- Yoga classes with the option to provide other opportunities for fitness and gentle movement.

To make the most of the therapeutic benefits of these activities and classes, a tranquil and nature-focussed environment is required together with being able to do more than one activity at any one time. We recognise that there are natural spaces in and around Melksham for the public. However, many beneficiaries do not feel comfortable accessing such spaces, for example parks or nature reserves, for several reasons such as safety, feeling vulnerable, inaccessibility, noise from nearby roads. Meadowbrook can offer supported sessions in a safe peaceful enclosed space that provides both areas for interaction and areas for 'time out'.

The CIC supports a more vulnerable demographic as a project. It is important that beneficiaries can access all the therapeutic activities in one place, on one site, as being a multi-site project would immediately be a barrier to many. For many beneficiaries, just leaving the house and getting to a different setting is a huge obstacle for them.

The Directors, volunteers and beneficiaries have tended the land at Melksham for the past 6 years to improve its usability for the proposal. Care has included rolling, topping, regular mowing, feeding the soil and landscaping. This

means that the site is now more or less level in the most used areas, ensuring safety for users especially with mobility issues and improved drainage in the growing areas.

The site characteristics and its location are therefore critical to the success of the project in terms of the activities that can be carried out, its accessibility to the beneficiaries and the inclusive way that the activities are facilitated.

Site Description

The land owned by the applicant comprises c. 0.7ha and falls to the south of Woodrow Road. It comprises two agricultural fields accessed via a track through a 5-bar gate from Woodrow Road.

The wider surroundings include agricultural fields and residential development fronting onto Woodrow Road. The site is situated immediately adjacent to the settlement framework boundary of Melksham and is approximately 800m northeast of the urban edge of the town.

Flood Risk Context

Most of the field falls within Flood Zone 1 (low risk of flooding) and has a very low likelihood of surface water flooding. The access road crosses the line of Bezzles Brook. Although this is a small watercourse, it is defined as a 'main river' by the Environment Agency. The access also falls within Flood Zones 2 and 3, which also covers Woodrow Road in this location. An extract from the Environment Agency Flood Map for Planning is shown at Figure 1.

The Wiltshire Level 1 Strategic Flood Risk Assessment shows that this is modelled to be Flood Zone 3a.

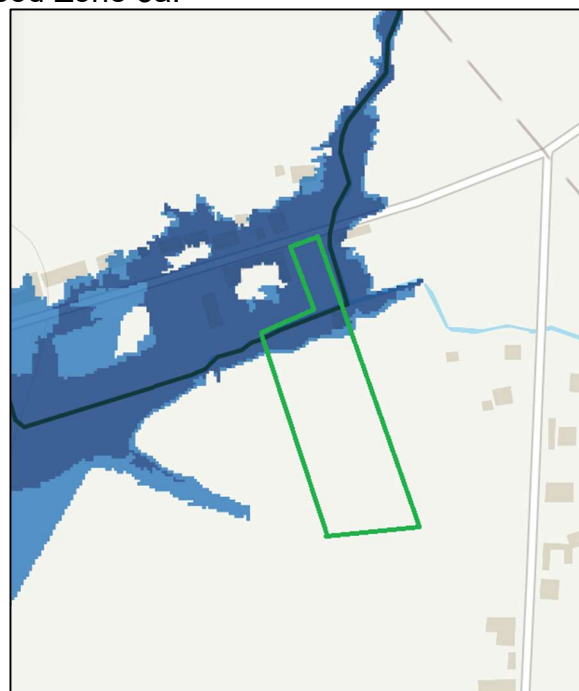


Figure 1: EA Flood Map extract. Site approximately outlined in green.

Proposed Development

The development is described as follows:

Change of Use of the land from Agricultural to Sui Generis Community Garden and Wellbeing Use (Retrospective) Erection of a Keder Polytunnel and Yurt (Proposed)

The proposal comprises the change of use of the land to a Sui Generis use so that it can be used by Meadowbrook to carry out its community work and the therapeutic activities noted above.

The site access crosses Flood Zones 2 and 3. All built structures within this pre-application are located within Flood Zone 1.

Built structures within this pre-application include:

- A compostable loo (existing)
- A small polytunnel (existing)
- A modest refreshments bar (existing)
- 2 x small metal garden sheds (proposed)
- A Keder polytunnel (6m x 12m) (proposed)
- A yurt (9-10 meters in diameter) (proposed)

3. Planning Policy Context

This section outlines the planning policy context for the proposed development with respect to flooding.

The Planning and Compulsory Purchase Act 2004 (Section 38(6)) provides that planning decisions shall be taken in accordance with the Development Plan unless other material considerations indicate otherwise.

Wiltshire Council's Development Plan for the site is formed of the Wiltshire Core Strategy (2015), Saved Policies from the West Wiltshire District Local Plan 2004 and the Joint Melksham Neighbourhood Plan 2 2020 - 2038.

We have reviewed saved policies within the West Wiltshire District Local Plan, and these are not relevant to flooding. The West Wiltshire District Local Plan is not therefore considered further within this report.

Other relevant material considerations include adopted Supplementary Planning Documents as well as the National Planning Policy Framework (NPPF) and associated Planning Practice Guidance (PPG).

Local Policy

Core Policy 67 relates primarily to housing development within flood zones and this policy cannot therefore be directly applied to the proposed development. It states:

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

Policy 3 from the Joint Melksham Neighbourhood Plan 2 states:

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

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

National Policy

At the heart of the NPPF is a sequential approach to flood risk. Paragraph 170 of the Framework states: *"Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere."*

Paragraphs 173-175 confirm that a sequential risk-based approach should be taken for planning applications.

Planning Practice Guidance provides additional explanation for the sequential test: *"In applying paragraph 175 a proportionate approach should be taken. Where a site-specific flood risk assessment demonstrates clearly that the proposed layout, design, and mitigation measures would ensure that occupiers and users would remain safe from current and future surface water flood risk for the lifetime of the development (therefore addressing the risks identified e.g. by Environment Agency flood risk mapping), without increasing flood risk elsewhere, then the sequential test need not be applied"*.

Paragraph 176 also states that *"Applications for some minor development and changes of use should also not be subject to the sequential test, nor the exception test set out below, but should still meet the requirements for site-specific flood risk assessments set out in footnote 63"*. Footnote 62 confirms that the sequential test should not be applied to domestic extensions of less than 250sqm and changes of use (except for changes of use to a caravan, camping or chalet site, or to a mobile home or park home site).

Footnote 63 identifies circumstances where a site-specific flood risk assessment should be provided with a planning application. This includes all development proposals within Flood Zones 2 and 3, and within Flood Zone 1 proposals on *"land that may be subject to other sources of flooding, where its development would introduce a more vulnerable use"*.

The proposal is for a change of use of the land and the erection of modest non-permanent structures associated with the community/CIC activities (noting that part of the proposed development is applied for retrospectively). A sequential approach to the proposed development has been undertaken to ensure that built structures associated with more vulnerable uses are located within Flood Zone 1. A site-specific Flood Risk Assessment will be provided with a planning application to support this proposal and set out how the layout and design ensures that users will remain safe from flood risk.

Notwithstanding the policies within the NPPF that indicate that a sequential test should not be applied to this development, this report provides a proportionate sequential assessment of the proposal to inform and support the pre-application request.

4. Sequential Test Methodology

Defining the Search Area

Planning Practice Guidance provides guidance on defining the search area for sequential tests and the need to apply a pragmatic approach to alternative sites: *“For individual planning applications subject to the sequential test, the area to which the test needs to be applied will be governed by local circumstances relating to the catchment area for the type of development proposed and the needs it is proposing to address. The catchment area should always be appropriate to the nature and scale of the proposal and the settlement it is proposed for. For some developments this may be clear, for example, the catchment area for a school. For a non-major housing development, it would not usually be appropriate for the area of search to extend beyond the specific area of a town or city in which the proposal is located, or beyond an individual village and its immediate neighbouring settlements.”* (Paragraph: 027a Reference ID: 7-027a-20220825 Revision date: 17 09 2025).

Meadowbrook is a Melksham-based organisation with an aim to support vulnerable people in this community. Importantly, Melksham Forest Ward is 1 mile away from the application site and is one of the most deprived wards in Swindon and Wiltshire. There are two local groups already working within that ward that want to work with, and signpost to, Meadowbrook. Beneficiaries therefore need to be able to easily access the site from Melksham.

The site is approximately 800m from the edge of the built-up area of Melksham. On this basis, and in the context of the guidance above, the area of search is limited to Melksham, Shurnold and Bowerhill with the boundary defined as 1km from the built-up edge. This is depicted in Figure 2 below.



Figure 2: Area of search defined approximately by red line boundary.

Alternative Sites Screening Method

A search for alternative sites has been undertaken using the following:

- Wiltshire Core Strategy, Joint Melksham Neighbourhood Plan 2 and Interactive Policy Map
- Wiltshire Emerging Local Plan Review
- Planning application online search via Wiltshire Council Planning Explorer to assess applications for major development within the search area
- Online searches via Rightmove, Zoopla, OnTheMarket and estate and land agent listings including Savills, Knight Frank, Cooper and Tanner, Symonds and Sampson, webbbpaton, AJW Land & Development, Chase Buchanan and Lock & Key

Sequential Test Criteria

The following criteria have been applied to assess sequentially preferable sites:

- Whether the site is within an area at lower risk of flooding (Flood Zone 1 and 2) by reviewing the Environment Agency Flood Map for Planning and Wiltshire Council Level 1 Strategic Flood Risk Assessment;
- Whether the site is of a size that can accommodate the requirements of the proposals (at least 0.7ha in this case);
- Whether the site is in an accessible location to serve the CIC beneficiaries;
- Whether the site can accommodate the requirements of the proposal including horticultural suitability and existing infrastructure;
- The existing use of the site and whether it is reasonably likely that a change of use could be achieved; and
- Whether the site is reasonably available to the applicant within an adequate timeframe to deliver the services that the CIC currently provides.

We would welcome confirmation from the Council through this pre-application enquiry that the search area, methodology and sequential test criteria are acceptable.

5. Alternative Sites Analysis

Policy Allocations

Strategic development to the east of Melksham that is identified within the Wiltshire Core Strategy for Melksham has largely been completed. Allocations within the Melksham Neighbourhood Plan 2 that fall within the search area are assessed in the table below.

Allocated Site	Flood Zone	Assessment
Land at Cooper Tires Factory Site	1, 2 and 3	The site is brownfield land allocated for the delivery of 100 homes within the part of the site that falls in Flood Zone 1. The site is brownfield land, formerly in industrial use with part of the land falling in Flood Zone 3. Surface water flooding is recorded throughout the site. It is currently covered by hardstanding and buildings. The site is owned by a development company with plans for regeneration of the site. <i>Therefore, the site is not suitable or available to accommodate the proposed development. Furthermore, parts of the site are subject to surface water flooding and within the same Flood Zones as the application site.</i>
Land at the Former Melksham Library Site	1	The site is a brownfield site measuring approximately 0.65ha, currently occupied by a car park and buildings. It is proposed to deliver around 50 extra care apartments for older people under Policy 7.2. The site is already smaller than the required area for the proposed development and significant investment would be required to provide for the CIC activities such as gardening. <i>Therefore, the site is not suitable to accommodate the proposed development.</i>
Land South of Western Way, Bowerhill	1, 2 and 3	This site is subject to planning permission for development and is therefore assessed in the planning applications section below.

Proposed allocations within the emerging Wiltshire Local Plan Review have been considered, however, these are not considered sequentially preferable. The emerging Local Plan Review is currently in the early stages of examination. The submitted Housing Trajectory and Assessment of Delivery anticipates that the strategic allocations at Melksham will not deliver homes until 2027 with the majority delivered towards 2030. However, the latest correspondence from the Inspectors has postponed further hearing sessions and it is therefore likely that this timeframe will be delayed. Therefore, even if the proposals could be accommodated as part of proposed development (which is not clear), sites are not likely to be available or accessible within a reasonable timescale to continue the ongoing work of the CIC.

Furthermore, the Planning for Melksham topic paper gives insight into the proposed development as part of strategic allocations. The concept plans for the three proposed allocations do not include provision for community uses. Whilst there is green infrastructure and play space, this is required to mitigate the impact of proposed housing development and would not provide land that could be dedicated for specific use by the CIC.

Major Planning Applications

We have reviewed the Council's planning explorer to consider any sites that could be delivered as part of approved, major applications for housing development within the search area. The sites and assessment are set out in the table below.

Site	Planning Ref	Flood Zone	Assessment
Land at Semington Road	20/01938/OUT & PL/2022/02749	1	Reserved matters were granted on 12 th May 2023 following outline permission. Construction is underway for 144 dwellings. There is green space provided as part of the proposals, however, this is required for drainage and to mitigate the impact of the development. It also falls adjacent to the sewage works and it is not clear that the ground would be suitable for growing. <i>This site is not therefore suitable or available to accommodate the proposed development.</i>
Land to the South of Western Way	PL/2022/08504 & APP/Y3940/W/23/3324031	1, 2 and 3	The site has outline planning permission for a 70-bed care home and up to 210 dwellings. Approved

			parameter plans show an area for the provision of some green space and allotments. However, these areas are not appropriate to accommodate the proposed development because: - They are required to mitigate the impact of the housing development; - The spaces are located at the edges of the development and have a multi-use function as public open space. They are not available to the applicant for sole use by the CIC; - Reserved matters approval is still required prior to commencement of construction. The land is not therefore available to the applicant now; - The spaces are located adjacent to, or within, the same flood zones as the application site. <i>The site is not therefore available or suitable to accommodate the proposed development.</i>
Land at Semington Road	PL/2022/08155 PL/2024/11665	& 1	Reserved matters were granted on 30th October 2025 following outline permission. Most of the site is to be occupied by housing with green space providing for drainage, tree planting and retained hedgerow. <i>The site is not therefore available to accommodate the proposed development.</i>
Land West of Semington Road	20/07334/OUT PL/2023/00808	& 1	Reserved matters were granted on 3rd August 2023 following outline permission. Most of the site is to be occupied by housing with

			green space providing for drainage, tree planting and retained hedgerow. <i>The site is not therefore available to accommodate the proposed development.</i>
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Other Strategic Sites

Other sites have been identified using the Council's Planning Explorer and estate agent website searches for sites within the search area.

Land at Blackmore Farm – outline planning permission was approved under reference PL/2023/11188 on 12th May 2025 for the *demolition of agricultural buildings and development of up to 500 dwellings; 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 development of the site (outline application relating to access).*

Whilst this site has outline planning permission, reserved matters are now required before commencement of development. Furthermore, the community use would need to be delivered after the construction of necessary infrastructure. In addition, the decision notice includes a planning condition that requires the delivery of 0.4ha land for a mixed-use hub (class E / class F). Given the approved uses, it is not clear that this land could be suitable for the proposed community garden Sui Generis use. Furthermore, the site size of 0.4ha would be well below the required area for the proposed development.

This site is not therefore available to the CIC within a reasonable timescale, nor large enough to accommodate the proposed development.

Land South of Snarlton Farm - outline planning permission was refused under reference PL/2024/07097 on 5th August 2025 for the *Erection of up to 300 dwellings (Class C3); land for local community use or building (incorporating Classes E(b), E(g) and F2(b) and (c)); open space and dedicated play space and service infrastructure and associated works on land South of Snarlton Farm (Outline planning application with all matters reserved except for two pedestrian and vehicle accesses (excluding internal estates roads) from Eastern Way) - Resubmission of PL/2023/07107).*

An appeal has been submitted under reference APP/Y3940/W/25/3373278 with an inquiry programmed for January 2026. Flood Zones 1, 2 and 3 cross the site. An area is reserved on the parameter plans for community use and allotment/orchard within Flood Zone 1. However, even if the appeal is successful, reserved matters approval is required before development can commence and it is unlikely that the land for community use would be available until the site accesses, site engineering works and construction of some of the

dwelling is completed. In addition, it is not clear that the proposed Sui Generis use would be acceptable given that the approved uses are class E(b), E(g), F2(b) and F2(c).

This site is not therefore available to the CIC within a reasonable timescale, nor suitable to accommodate the proposed development.

Land to the west of the A350 – an outline planning application for up to 150 dwellings and public open space was withdrawn on 16th November 2022. No further applications for development have been submitted and the site is not allocated for development. The site falls within Flood Zone 1. There are several planning constraints that mean that the site is not well-suited to the proposed development:

- Site location along the A350. This is a primary network route and is a primary north-south route with regional significance. The highways consultation response to the withdrawn application indicates that there would be concerns about access to new development from the A350.
- The site falls within a 'Rural Gap' defined by Policy 19 of the Melksham Neighbourhood Plan 2 where development is restricted to respect the separation of settlements, including Melksham and Beanacre.
- There is currently no access to the site from the highway. A proposal would require the creation of a new access from the A350. We believe that the highways authority would have concerns about the creation of an access. Furthermore, the construction of an access would be cost-prohibitive for the CIC.
- The site lies between the railway and the A350. Noise from these routes would not provide the tranquil, natural environment that the CIC needs to deliver on its core priorities.
- Two thirds of the site comprises Grade 2 agricultural land. Planning policy seeks to protect the best and most versatile agricultural land.
- Ecological corridors cross the site along mature vegetated corridors.

Furthermore, unlike the application site, the land at Beanacre has no existing infrastructure for water or electricity that would support a community use.

The land is not currently being marketed online and it is not therefore currently available to the applicant. In addition, even if the site were on the market, it is unlikely that the CIC would have adequate funds to buy more land that is not well serviced to deliver the activities required.

This site is not therefore suitable or available to accommodate the proposed development.

Agent Listings

An online search for land on the market within the search area has been undertaken using the following websites:

- Zoopla
- Rightmove
- OnTheMarket
- Savills
- Knight Frank
- Cooper and Tanner
- Symonds and Sampson
- Webbpaton
- AJW Land & Development
- Lock & Key
- Chase Buchanan

Only one site has been identified that is being marketed by AJW Land & Development.

The site is referred to as 'Potential Development Land' at Bowerhill, east of the A350. The site plan extracted from the Sales Brochure is shown in Figure 3 below.

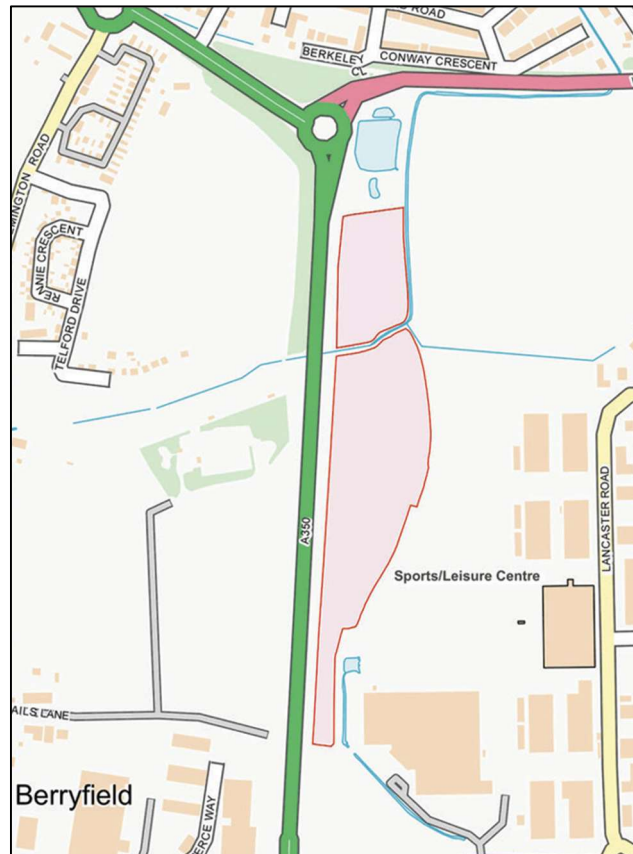


Figure 3: Site marketed by AJW Land & development (extract from Sales Brochure)

Most of the land falls within Flood Zone 1, however, there are also areas of Flood Zones 2 and 3 across the site as well as surface water flooding.

There are also planning constraints that mean that the site is not well-suited to the proposed development:

- Historic planning applications from the early 1980s approved a change of use of this land to 'formal recreation'.
- There is currently no access to the site from the highway. A proposal would require the creation of a new access from the A350. We believe that the highways authority would have concerns about the creation of an access. Furthermore, the construction of an access would be cost-prohibitive for the CIC.
- The site lies east of and within a buffer zone for the sewerage treatment works and is unlikely to be suitable for food growing activities.
- The site falls between commercial development and the A350. Noise from the road and surrounding development would not provide the tranquil, natural environment that the CIC needs to deliver on its core priorities.
- The land has no existing infrastructure for water or electricity that would support a community use, unlike the application site.

This site is not therefore suitable to accommodate the proposed development.

6. Conclusion

This Sequential Test Report has been prepared on behalf of Meadowbrook (Wiltshire) CIC to support a pre-application request for development proposals at 211, Woodrow Road, Melksham, SN12 7RD.

This report sets out relevant planning policy and guidance that underpins the criteria for the sequential test.

A search area has been defined and a search for alternative sites within the search area has been undertaken using:

- Wiltshire Core Strategy, Joint Melksham Neighbourhood Plan 2 and Interactive Policy Map
- Wiltshire Emerging Local Plan Review
- Planning application online search via Wiltshire Council Planning Explorer to assess applications for major development within the search area
- Online searches via Rightmove, Zoopla, OnTheMarket and estate agent listings including Savills, Knight Frank, Symonds and Sampson, Cooper and Tanner, webbpaton, AJW Land & Development, Chase Buchanan and Lock & Key

Section 5 assesses all sites that have been identified. This demonstrates that there are no sequentially preferable sites that could reasonably accommodate the proposed development.