

Planning Statement

Land east of Blackmore Farm, Melksham

April 2026

Turley

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Client

Gleeson Land

Our reference

03004

May 2026

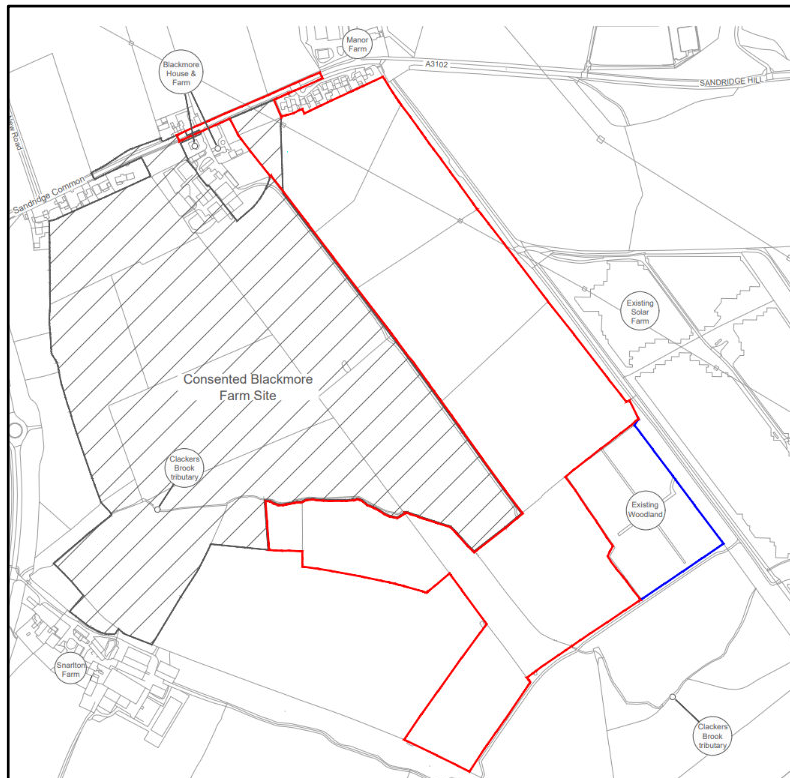
1. Introduction

- 1.1 This Planning Statement has been prepared by Turley on behalf of Gleeson Land in relation to an Outline Planning Application for the development of the Land east of Blackmore Farm, Melksham (“the site”) within the administrative area of Wiltshire Council.
- 1.2 This Outline Application seeks the development of up to 275 dwellings, with all matters reserved, with the exception of the primary vehicular and pedestrian access to the site from Sandridge Common. Accordingly, all other matters of further access (including internally within the site) and layout, scale, appearance and landscape are reserved for future determination.
- 1.3 The description of development is as follows:
- “Outline planning application for the erection of up to 275 dwellings (including affordable housing), associated infrastructure, landscape and biodiversity enhancements, with all matters reserved except for the main access from Sandridge Common.”*
- 1.4 The application site immediately adjoins the ‘Phase 1’ site, which has outline consent¹ for up to 500 homes and employment uses. The current proposals can come forward in a way that respects and enhances the consented growth at this side of Melksham.
- 1.5 This Planning Statement is structured in the following order and is to be read in combination with the other submitted planning application documents as listed on the covering letter:
- The Site and Context
 - Planning History and Proposed Development
 - The Development Plan and Other Material Planning Documents
 - Planning Assessment
 - Planning Obligations; and
 - Planning Balance and Conclusions

¹ Ref. PL/2023/11188

2. The Site and Context

- 2.1 The site is 27.41 hectares in size and lies on land which extends eastwards up to the existing Bridleway MELW40 and northwards to adjoin existing homes at Lopes Close and the primary highway at Sandridge Common. Land immediately west of the site has outline permission for up to 500 homes and employment land².



- 2.2 The site lies within walking and cycling distance of the Water Meadow public house, the Co-op food store, and Forest and Sandridge Primary School, all located off Cranesbill Road to the west of the site. Melksham town centre, which offers a wide range of retail, leisure, and employment opportunities, is located approximately 2.5 km from the site and is considered to be within acceptable walking and cycling distance. The site will also benefit from direct access to facilities and services available within Phase 1 of the wider development.
- 2.3 The site is not located within a Conservation Area, and there are no listed heritage assets within the red line boundary. A Grade II listed building (Blackmore Farmhouse) is located to the west of the proposed access; however, it is separated from the site by a hedgerow, domestic gardens, and small outbuildings. Heritage assessment work has been prepared to support the application and indicates that any impact on the significance of this asset would be at the lower end of less than substantial harm and only through the impact on the assets setting rather than to the fabric.

² This was approved in May 2025 and a first reserved matters application for 229 dwellings is currently pending determination (ref. PL/2026/01555)

- 2.4 The site is crossed by the route of a 132 kV overhead power line and an existing potable water main.
- 2.5 In terms of flood risk, the majority of the site lies within Flood Zone 1, as defined by the Government's Flood Risk Map for Planning. A small area to the south falls within Flood Zones 2 and 3; however, all proposed development will be located within Flood Zone 1. Parts of the site are identified as having a low to high risk of surface water flooding. A tributary of Clacker's Brook runs through part of the southern field.
- 2.6 The site does not lie within a nationally or locally designated landscape but is adjacent to a Special Landscape Area as designated in the adopted Wiltshire Core Strategy. The site does not fall within any other landscape-related designation.
- 2.7 There are several Public Rights of Way (PROWs) in the vicinity of the site. Bridleway MELW40 runs south-east along the eastern boundary. Footpath MELW26 runs south-east from Sandridge Common and crosses the south-western part of the site. Bridleway MELW41 runs south-east from Eastern Way, passing adjacent to the south-western boundary, further enhancing pedestrian and equestrian connectivity.

3. Planning History and Proposed Development

Planning History

- 3.1 A Scoping Request was originally submitted for Land at Blackmore Farm in 2022 (Ref: PL/2022/01864) for the site and the consented site (Phase 1) to the west.
- 3.2 An updated Scoping Request was submitted for the application site in 2025 (Ref: PL/2025/08778) in respect of the proposed development. The Scoping Decision was issued on 6 January 2026, and the feedback provided has been taken into account in the preparation of the Environmental Statement and incorporated into the application as appropriate.
- 3.3 The northern parcel of land was included in an application for outline permission for up to 500 residential dwellings and associated uses, for which planning permission was granted in May 2025 (ref. PL/2023/11188). Part of this application falls within the red line of the site and the approved use in this location comprises an emergency pedestrian/cycle route and orchard planting, which is retained in this application.
- 3.4 The site formed part of a wider land parcel submitted for consideration in the 2017 Strategic Housing and Economic Land Availability Assessment (SHELAA) under reference 3552. In summary, the assessment identified the land as having potential for future development, subject to addressing constraints including landscape impact, access arrangements, and the relationship with surrounding development. The site was not proposed to be allocated for development but was acknowledged as contributing to the longer-term development strategy of the area.

The Proposed Development

- 3.5 The proposed development comprises a new residential development, consisting of up to 275 dwellings with provision of relevant infrastructure. The description of the proposed development is:

“Outline planning application for the erection of up to 275 dwellings (including affordable housing), associated infrastructure, landscape and biodiversity enhancements, with all matters reserved except for the main access from Sandridge Common”

- 3.6 The proposals include:
- Erection of up to 275 dwellings;
 - 30% of units will be affordable housing (up to 83 affordable homes);
 - Vehicular access from Sandridge Common;
 - Large areas of public open space including areas for recreation and formal play (including a Local Area for Play and Local Equipped Area for Play);

- New planting and biodiversity enhancement, achieving at least a 10% Biodiversity Net Gain;
- Enhanced pedestrian connectivity to the east, west, north and south including to existing Public Rights of Way (PRoW); and
- Sustainable Urban Drainage features.

3.7 A full pack of application documents is included with this submission, and these documents and plans are detailed on the covering letter.

Pre-Application Engagement

3.8 The Applicant submitted a pre-application request to the Council on 18th December 2025 (Ref. ENQ/2025/02104). A written response was issued on 10th March 2026 followed by detailed landscape feedback in an email dated 23rd March 2026. A summary of the feedback provided for each discipline is set out below:

- Principle of Development – The site is not allocated in the current or emerging development plan and, therefore, the proposal is contrary to the development plan. It was agreed that, at the time of the pre-application advice, the tilted balance in paragraph 11(d) of the NPPF was engaged.
- Design – A review of the masterplan is recommended to investigate alternative parking solutions, alongside a detailed review of the attenuation basins to ensure they provide the naturalistic qualities expected of integrated landscape features. The design feedback also suggests that additional woodland planting should be provided to create a stronger landscape buffer and contribute more meaningfully to long-term canopy enhancement. It is suggested that a requirement for a Design Code should be secured at the outline application stage.
- Landscape – The response highlighted a narrow landscape buffer along the north-east edge of the site and confirmed that cumulative impacts and sequential views had been agreed with the Consultant via email ahead of the pre-application response. It was noted that Wiltshire now forms part of the Western Forest initiative, which seeks to increase woodland canopy cover, and this is a material planning consideration.
- Arboriculture – An Arboricultural Impact Assessment was requested as part of any future application.
- Ecology – The response concludes that updated surveys would be required to support any future application, building on the existing Phase 1 baseline. In addition, any application should be supported by a Phase 2 Ecological Assessment, Ecological Parameter Plan, BNG Statement and statutory Metric, initial CEMP principles, a lighting strategy and a preliminary outline EMMP framework. To summarise, the principle of development is not precluded on ecological grounds, however any future application would need to demonstrate

that protected species, ecological connectivity and Priority Habitats are fully considered, buffered and enhanced.

- Drainage – The LLFA requested a site-specific Flood Risk Assessment to demonstrate that the site would not be adversely affected by flood risk from any source, and to set out how flood risk would be managed. It was also recommended that appropriate ground investigations are undertaken to characterise flood risk and assess the site's infiltration potential prior to developing a detailed drainage strategy.
- Education – The response outlined the financial contribution required as a result of the Proposed Development with a caveat that this would change as a future application emerges.
- Housing Enabling – The response sets out the policy requirement for affordable housing which is 30% and references the neighbouring Phase 1 scheme, which provides 40% affordable housing based on the (then) emerging Local Plan Review. Accordingly, a 40% on-site provision is sought, equating to 110 affordable dwellings.
- Conservation – The response concludes that the proposed development would result in harm to the setting and significance of the Grade II listed Blackmore Farmhouse, with the level of harm identified as "less than substantial". It was also noted that no heritage benefits were proposed as part of the pre-application submission.
- Archaeology – The response confirmed that the Archaeologist is awaiting submission of the evaluation report, and further comments will be provided once this has been reviewed.
- Agricultural Land – As the site comprises agricultural land predominantly classified as Grades 3–4, it should be subject to soil analysis to confirm whether any Best and Most Versatile (BMV) land is present.
- Validation – The pre-app response highlighted the need for any future application to be accompanied by a Sustainable Energy Strategy and Soil Sampling Verification.

3.9 No feedback was received from the Highway or Public Right of Way teams.

Community Engagement

- 3.10 The Applicant has undertaken public engagement in the form of a letter drop and consultation website to the surrounding community (circa. 593 addresses). The aim of which is to inform the local community about the proposals and to provide them with an opportunity to give feedback on the proposed development.
- 3.11 The consultation period was undertaken between 23 February and 9th March 2026.

- 3.12 In addition to the public consultation, the Applicant attended a meeting with Melksham Without Parish Council on 5 March 2026 and arranged an in-person site visit for immediate neighbours, which took place on 30 March 2026.
- 3.13 The accompanying Statement of Community Engagement [“SCE”] (prepared by Turley) sets out the detail of this engagement and provides a summary of the responses received.

4. The Development Plan and Other Material Planning Documents

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

“If regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise”.

4.2 The site is located within the administrative boundary of Wiltshire Council. The Development Plan for the site comprises:

- Wiltshire Core Strategy Development Plan (adopted 20th January 2015); and
- Wiltshire Housing Site Allocations Plan (adopted February 2020).

Development Plan

Core Strategy

4.3 The Wiltshire Core Strategy was adopted in January 2015 and sets out the strategic planning policy for Wiltshire covering the period up to the end of March 2026. It is therefore now time expired. The plan is, therefore, wholly out-of-date and the Core Strategy housing requirement is not compliant with the NPPF due to the age of the housing need evidence base.

4.4 Nevertheless, despite its age, the Core Strategy remains the starting point for the determination of the application and the following policies covered within this section are considered by the Applicant to be the most relevant for the determination of the application.

4.5 The key policies relating to the principle of development are provided below

- Core Policy 1: Settlement Strategy states that Market Towns (which Melksham is classified as) have the potential for significant development that will increase the jobs and homes in each town in order to help sustain and, where necessary, enhance their services and facilities and provide better levels of self-containment and viable sustainable communities.
- Core Policy 2: Delivery Strategy sets out that at least 42,000 new homes will be distributed around Wiltshire and delivered in a sustainable pattern.
- Core Policy 3: Infrastructure Requirements states that developments should provide for the necessary on-site and where appropriate, offsite infrastructure requirements arising from the proposal. This will be delivered directly through an appropriate financial contribution prior to, or in conjunction with new development.

- Core Policy 43: Providing Affordable Homes sites of 5 or more dwellings will be required to provide affordable housing, Melksham is situated within the 30% affordable housing zone.
- Core Policy 45: Meeting Wiltshire's Housing Needs sets out that new housing should be well designed to address local housing needs incorporating a range of different types, tenures and sizes of homes to create mixed and balanced communities.
- Core Policy 50: Biodiversity and Geodiversity seeks to protect features of nature conservation and geological value as part of the design rationale. All developments should seek opportunities to enhance biodiversity, with major development in particular to include measures to deliver biodiversity gains.
- Core Policy 51: Landscape seeks to protect, conserve and where possible enhance landscape character. Proposals should be informed by and sympathetic to the distinctive character areas identified in the relevant Landscape Character Assessment(s) and any other relevant assessments and studies.
- Core Policy 52: Green Infrastructure sets out that development proposals must make provision for the retention and enhancement of Wiltshire's green infrastructure network and shall ensure that suitable links to the network are provided and maintained.
- Core Policy 55: Air Quality requires that development proposals, which by virtue of their scale nature or location are likely to exacerbate existing areas of poor air quality, demonstrate that measures can be taken to effectively mitigate emission levels in order to protect public health, environmental quality and amenity.
- Core Policy 57: Ensuring High Quality Design and Place Shaping seeks to ensure a high quality of design for all new developments. Developments should create a strong sense of place through drawing on the local context and being complementary to the locality.
- Core Policy 58: Ensuring the Conservation of the Historic Environment seeks to protect, conserve and where possible enhance the historic environment. Designated heritage assets and their settings will be conserved, and where appropriate enhanced in a manner appropriate to their significance. Distinctive elements of Wiltshire's historic environments, including non-designated heritage assets, are to be conserved and enhanced where possible.
- Core Policy 60: Sustainable Transport promotes the need to reduce travel particularly by private car, and encourage the sustainable, safe and efficient movement of people and goods within and through Wiltshire.
- Core Strategy 61: Transport and Development states that in order to encourage sustainable transport alternatives, transport assessments must demonstrate that consideration has been given to the transport hierarchy as set out in the plan. Where appropriate, contributions will be sought towards sustainable transport

improvements, and travel plans will be required to encourage the use of sustainable transport alternatives.

- Core Policy 62: Development Impacts on the Transport Network requires that developments provide appropriate mitigation measures to offset any adverse impacts on the transport network at both the construction and operational stages.
- Core Policy 67: Flood Risk requires all new developments 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.

Joint Melksham Neighbourhood Plan 2 (“JMPN2”)

4.6 The site is located within the designated area of Melksham Without Parish Council. The Parish Council ‘made’ the Joint Melksham Neighbourhood Plan 2 (together with Melksham Town Council) in July 2025.

4.7 The key policies relating to the site are:

- Policy 1: Sustainable Design and Construction requires the submission of a sustainable energy strategy to demonstrate how carbon emissions are minimised.
- Policy 3: Flood Risk and Natural Flood Management requires appropriate mitigation and construction methods and clearly demonstrate how flood risk is mitigated.
- Policy 5: Community Engagement states that proposals should be prepared with early, proactive, proportionate and effective engagement.
- Policy 6: Housing at Defined settlements notes that housing outside settlement boundaries will be managed in accordance with the adopted Development Plan and should meet evidenced local housing need. Proposals should demonstrate how the housing types and tenures respond positively to meeting local needs.
- Policy 11: Sustainable Transport and Active Travel notes that development should complement the Sustainable Transport Hierarchy, including provision for ultra-low emission vehicles. Major development proposals should be supported by a Travel Plan that demonstrates how sustainable transport modes are maximised and that safe and suitable movement can be achieved for all people.
- Policy 12: Green and Blue Infrastructure supports development that will result in the creation of new Green and Blue Infrastructure and/or contribute to the protection, management, enhancement and connectivity of existing GBI.
- Policy 13: Biodiversity requires development to deliver at least a 10% improvement in biodiversity.

- Policy 17: Trees and Hedgerows provides further support for the protection of ancient and veteran trees, reduced damage or loss of existing trees and hedges and increases in tree canopy across the site.
- Policy 18: Landscape Character sets out criteria for proposals to integrate natural features where possible, demonstrate that the whole scheme draws on local landscape characteristics, responds sensitively to the settlement setting and conserve or enhance the character, openness, tranquillity and amenity of the open countryside.
- Policy 20: Locally Distinctive, High Quality Design states that proposals should contribute positively to the conservation, enhancement and extension of the quality and local distinctiveness of the neighbourhood area.
- Policy 21: Local Heritage requires development to be supported by a Heritage Statement and archaeological surveys, where relevant.

Other Material Considerations

Emerging Wiltshire Local Plan

- 4.8 The emerging Local Plan was submitted to the Secretary of State for examination on 28 November 2024, and hearings were held in November 2025. However, following an update from the Inspector outlining significant issues with the examination, it has been recommended that the plan be withdrawn. This is due to be considered further at Cabinet and Council meetings in May 2026.

National Planning Policy Framework

- 4.9 The latest revised National Planning Policy Framework (NPPF) was published in December 2024. The NPPF sets out the Government's planning policies for England and how these are expected to be applied.
- 4.10 The individual technical and environmental reports provide specific reference to national policy relevant to each specific discipline and a summary of the main relevant parts of the Framework is provided below.
- 4.11 At the core of the NPPF is a presumption in favour of sustainable development (Paragraph 10). To achieve this, the NPPF cites three overarching independent but mutually supportive objectives (Paragraph 8):
- An economic objective – to build a strong and competitive economy by ensuring the right land is used at the right times to support growth, innovation, and improved productivity; and by coordinating the provision of infrastructure;
 - A social objective – to support communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations, and by fostering well-designed places, with accessible services and open spaces that reflect current and future needs, supporting communities' health, social and cultural well-being; and

- An environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.
- 4.12 Paragraph 11 identifies the NPPF’s presumption in favour of sustainable development. For decision-taking, this presumption means approving development proposals which accord with the development plan without delay and where the development plan is absent, silent, or relevant policies are out-of-date, permission should be granted unless:
- Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination; or
 - Specific policies within the NPPF provide a strong reason for why development should be restricted.
- 4.13 Paragraph 14 states that where the presumption (at paragraph 11d) applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided the following apply:
- a) the neighbourhood plan became part of the development plan five years or less before the date on which the decision is made; and
- b) the neighbourhood plan contains policies and allocations to meet its identified housing requirement (see paragraphs 69-70).
- 4.14 Paragraph 61 confirms that the Government’s objective of significantly boosting the supply of homes, requiring a sufficient amount and variety of land can come forward where it is needed. The paragraph confirms that the overall aim should be to meet an area’s identified housing need, including with an appropriate mix of housing types for the local community. The requirement to meet an areas housing need is a change from the December 2024 NPPF where the requirement was to meet as much of an areas housing need as possible. This emphasises that full housing needs must be met.
- 4.15 Paragraph 78 is focused around significantly boosting the supply of housing. It states that Local Planning Authorities should maintain and update annually a 5-year supply of deliverable sites.
- 4.16 Paragraph 124 confirms that planning policies and decisions should support development that make effective use of land.
- 4.17 Paragraph 135 states that planning policies and decisions should ensure that developments function well and add to the overall quality of the area as well as being visually attractive and sympathetic to local character, history, the surrounding built environment, and landscape setting.

- 4.18 Paragraph 187 states that planning policies and decisions should contribute to and enhance the natural and local environment by (as is relevant in this case) the intrinsic character and beauty of the countryside and minimising impacts on ecological and environmental assets.

Planning Practice Guidance

- 4.19 The PPG expands on the high-level policy framework of the NPPF by setting out detailed guidance. This includes guidance on flood risk, historic environment, housing supply and delivery, natural environment.

5 Year Housing Land Supply

- 4.20 The most recent Housing Land Supply Statement and Annual Monitoring Report, published in June 2025 with a 1st April 2024 base date, sets out the Council's position that it has a deliverable supply of only 2.42 years (a shortfall of 9,561 years).
- 4.21 Wiltshire Council is not, therefore, able to demonstrate a sufficient housing land supply as required by NPPF paragraph 78 and, indeed, the shortfall in supply is very serious and significant.
- 4.22 As a consequence of not being able to demonstrate a sufficient housing land supply, paragraph 11 (and the tilted balance) is engaged. We consider this further under the Planning Assessment section, below.

Supplementary Planning Documents

- 4.23 The Wiltshire Design Guide (adopted 25 March 2024) is of relevance to the proposed development.
- 4.24 The Wiltshire Design Guide sets out the approach towards design and place-shaping to ensure future development makes a positive contribution to the physical character and heritage of Wiltshire. Whilst at outline stage, the proposal has been carefully considered to ensure compliance with the Design Guide, where possible. This is further detailed in the Design and Access Statement.

5. Planning Assessment

- 5.1 This section provides an assessment of the proposed development with reference to the planning policy context provided in Section 4, as well as other relevant considerations.

Principle of Development

- 5.2 This application is to be determined in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, which requires decisions to be made in accordance with the Development Plan unless material considerations indicate otherwise.
- 5.3 The Development Plan for Wiltshire comprises the Wiltshire Core Strategy (WCS), the Wiltshire Housing Site Allocations Plan and the JMNP2. The emerging Wiltshire Local Plan was submitted for examination but is likely to be withdrawn³ and carries very limited weight.
- 5.4 Core Policy 1 of the Core Strategy sets out the settlement strategy and identifies the settlements where sustainable development will take place. Melksham is identified as a Market Town and such centres are defined as settlements that have the ability to support sustainable patterns of living in Wiltshire through their current levels of facilities, services and employment opportunities. The settlement hierarchy was unchanged in the submitted version of the Wiltshire Local Plan.
- 5.5 Although the site is located outside the settlement boundary, it represents a logical and sustainable extension to the settlement. The site is well-related to the built-up area and is immediately adjacent to Phase 1, which was identified as a draft allocation in the submitted Local Plan and benefits from Outline Planning Permission, with the first detailed application submitted on 31 March 2026. The proposal integrates with existing and planned development, supporting the principles of sustainable growth.
- 5.6 Core Policy 2 sets out a general presumption against development outside defined settlement boundaries unless brought forward through a Site Allocation Development Plan Document or a Neighbourhood Plan. The JMNP2 defers to the adopted Development Plan for housing outside settlement boundaries and requires such development to meet identified local housing needs, as outlined below.
- 5.7 Policy 6 of the JMNP2 notes that housing outside of settlement boundaries will be managed in accordance with the adopted Development Plan and should meet evidenced local housing need. The site lies beyond the defined settlement boundary and therefore does not strictly accord with Core Policy 2 of the Core Strategy.
- 5.8 However, in the current circumstances, significant material considerations justify a departure from this policy. The site forms a logical and sustainable extension to Melksham, and is immediately adjacent to land benefiting from outline planning permission and identified as a draft allocation in the submitted Local Plan, and will

³ A report will be taken to Cabinet in June 2026 seeking approval to withdraw the submitted plan and start work on a new Local Plan

contribute meaningfully to addressing the Council's housing land supply shortfall. In this context, reduced weight should be afforded to restrictive settlement boundary policies.

Other Material Considerations

- 5.9 Where a local authority is unable to demonstrate a five-year supply of deliverable housing land, the weight that can be afforded to policies restricting the delivery of homes (such as Core Policy 2) is reduced.
- 5.10 The Council is currently unable to demonstrate a five-year supply of deliverable housing land, as confirmed through its latest Housing Land Supply Statement and Annual Monitoring Report, published in June 2025. Indeed, the Statement confirms the Council (on its own evidence) has a deliverable supply of only 2.42 years. This equates to a very serious and significant shortfall of 9,561 dwellings. It is clear that urgent action needs to be taken to address this shortfall.
- 5.11 In light of this, the Council should maximise opportunities for sustainable housing delivery to address the identified shortfall. In accordance with paragraph 11(d) of the NPPF, relevant policies for the supply of housing should therefore be considered out of date, and the presumption in favour of sustainable development applies.
- 5.12 Paragraph 11(d)(ii) of the NPPF requires that, in such circumstances, planning permission should be granted unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework as a whole. This is commonly referred to as the tilted balance.
- 5.13 Paragraph 14 of the NPPF confirms that the adverse impact of allowing development that conflicts with a neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided the following apply:
- a) The neighbourhood plan became part of the development plan five years or less before the date on which the decision is made; and
 - b) The neighbourhood plan contains policies and allocations to meet its identified housing requirement.
- 5.14 The JMNP2 was 'made' less than five years ago, and allocates a number of sites for housing development in Melksham. It also states that the identified housing requirement is 270 dwellings. However, this figure was based on the emerging Wiltshire Local Plan which has now stalled at examination and is likely to be withdrawn imminently. We therefore consider there to be some doubt as to whether the JMNP accords with part b of paragraph 14.
- 5.15 In addition, Policy 6 of the Neighbourhood Plan sets out that housing outside settlement boundaries will be managed in accordance with the adopted development plan and should meet evidenced local housing need. It thereby defers to the Core Strategy and the evidence on housing need. The Core Strategy plan period ended in March 2026 and the Council currently has a significant housing land supply shortfall of

over 9,500 homes. The issues with the submitted Local Plan indicate that there is likely to be a lack of an up to date development plan in place for Wiltshire for some time and no plan led plan led mechanism to rectify the housing land supply shortfall.

- 5.16 In addition, Paragraph 14 states that conflicts with a neighbourhood plan are likely to significantly and demonstrably outweigh the benefits, not that they would certainly outweigh the benefits. This issue in relation specifically to the Melksham Neighbourhood Plan was recently considered at an inquiry for a site at Land off Woodrow Road, Melksham (ref. 3374421). The Inspector states in the decision, at paragraph 43;

...in the parlance of Framework paragraph 14 'likely' does not and cannot mean 'absolute'. It does not place a firm bar against development going ahead even if counter to a Neighbourhood Plan that meets the tests in Framework paragraph 14. I acknowledge that the JMNP2 has relatively recently been made and reflects the wishes of those who supported it at referendum. I also note that development has been coming forward in Melksham, but the Council's housing land supply shortfall is acute and county-wide. Action to address that needs to be taken now through the provision of housing on suitable sites.

- 5.17 The appeal was allowed. For the purposes of the Blackmore Farm application, our view is that the conflicts with JMNP2 policies do not significantly demonstrably outweigh the benefits of the development proposals.
- 5.18 The proposed development is well related to the built-up area of Melksham, and the site represents a logical extension to the settlement due to its location adjacent to Phase 1. The site will benefit from direct pedestrian access into Phase 1 which will deliver a community hub, primary school and onward access to other key village amenities (including primary school, pub and village hall). The site also benefits from good access to pedestrian and cycle connections and is well located in relation to bus stops.
- 5.19 The application is submitted in outline and is supported by an illustrative Masterplan demonstrating that the site can accommodate a high-quality, landscape-led development that responds appropriately to its context. The proposal aims to deliver a distinctive, well-integrated residential scheme that enhances the settlement edge and delivers meaningful benefits to the local community.
- 5.20 The scheme will deliver 30% affordable housing in accordance with Core Policy 43. The affordable homes will be tenure-blind and distributed throughout the development. The final mix will be agreed through the reserved matters in line with Core Policy 45 and the latest evidence of local need. Providing affordable homes is one key policy referred to under NPPF paragraph 11. D) ii.
- 5.21 The accompanying technical reports (further detail set out below) demonstrate that there are no adverse impacts which would significantly and demonstrably outweigh the benefits of delivering new housing in this location. As such, the proposal accords with the overarching objective of the NPPF to significantly boost the supply of housing.

- 5.22 To summarise, the proposed development represents a sustainable and deliverable opportunity to contribute to local housing needs – including policy compliant affordable provision – in a location identified as suitable for growth. Given the current housing land supply position and the site’s accessibility to services and facilities the development is supported when determining the overall planning balance in accordance with the presumption in favour of sustainable development, and planning permission should be granted accordingly.

Design

- 5.23 Chapter 12 of the NPPF emphasises the importance of achieving well-designed places, particularly those that respond positively to local character and history, and which are visually attractive through high-quality architecture and appropriate landscaping.
- 5.24 This approach is reiterated within the JMNP2, specifically Policy 20, which requires development proposals to contribute positively to the conservation, enhancement and extension of the quality and local distinctiveness of the neighbourhood area.
- 5.25 The Illustrative Masterplan submitted in support of this application demonstrates how residential development could be delivered on the site. The accompanying Design and Access Statement, prepared by Origin3, provides further detail on the design principles underpinning the masterplan, including an assessment of surrounding development to ensure contextual consistency. In response to feedback received at the pre-app stage, enhanced woodland planting has been provided in the Clackers Valley park, creating a stronger buffer in this area.
- 5.26 Together, these documents confirm that the scheme is landscape-led, with a strong emphasis on creating multifunctional open spaces and a connected green infrastructure network, particularly along the eastern boundary. This approach enables landscape enhancement, ecological gain and opportunities for community recreation. The proposals incorporate both retained and new planting to ensure that the development conserves and enhances the setting and character of Melksham.
- 5.27 The proposed development would deliver an average density of approximately 36 dwellings per hectare across the site. This would be achieved through a varied layout and housing typology, with the final housing mix to be agreed with the Council at the reserved matters stage. The scheme therefore proposes a lower average density when compared to the adjacent development of up to 500 dwellings, which achieves approximately 38.9 dwellings per hectare. This is considered to be an appropriate design response in the edge of settlement location.
- 5.28 In response to community engagement, particularly the neighbour site visit undertaken on 30 March, the design has evolved to provide an additional landscape buffer between existing and proposed dwellings. This includes a 6-metre-wide buffer incorporating a planted hedge with scattered trees and shrubs along the boundary, as illustrated in Figure 4.17 of the DAS.
- 5.29 The information submitted in support of the application demonstrates that the proposed development would deliver a high-quality, comprehensive scheme capable of

conserving and enhancing the character, quality and local distinctiveness of the neighbourhood area, in accordance with relevant Neighbourhood Plan policies.

- 5.30 Accordingly, the proposed development complies with the relevant design-related policies of the Development Plan and the NPPF, or is capable of doing so at the reserved matters stage.

Transport and Access

- 5.31 The application is supported by a Transport Assessment, prepared by i-Transport. This details the principal means of access to the site via a new simple priority junction from Sandridge Common Road. The junction has been designed to accommodate all modes of transport including vehicular, cycle and pedestrian. The assessment demonstrates that the proposed access arrangement is safe and suitable, with adequate capacity, in accordance with Core Policy 61.
- 5.32 In addition to the principal access, the proposed development will deliver two further pedestrian/cycle/vehicular accesses to the Phase 1 site and the points of connection are illustrated on the Masterplan. Direct access is also proposed to bridleway MELW40 on the eastern boundary of the site to facilitate leisure walking journeys.
- 5.33 The proposed development offers a range of measures as part of a comprehensive sustainable travel strategy, ensuring that:
- Good connectivity to both the A3102 Sandridge Common Road to the north and via the extension footway and cycleway network provided by the adjacent Phase 1 site. This includes improvements to the footway on Sandridge Common and a connection to Bridleway MELK 40 to the east.
 - Extension of the new town bus service provided by the adjacent site into phase 2, with appropriate provision made within the Illustrative Masterplan to allow for this.
 - Enhanced opportunities for future residents to walk, cycle and use public transport for day-to-day local journeys to and from the site.
- 5.34 A Framework Travel Plan has been prepared in support of the application and will be developed into a Full Travel Plan (“FTP”) at Reserved Matters stage. This document identifies opportunities for the effective promotion and delivery of sustainable transport initiatives for the site.
- 5.35 In sustainability terms, the site benefits from a highly accessible location adjacent to Phase 1 of the wider development. Phase 1 provides access to a primary school, employment opportunities, and a mixed-use hub, thereby enhancing opportunities for sustainable transport and reducing reliance on private vehicles. The proposed development will incorporate pedestrian and cycle connections to the neighbouring site to ensure that residents of Phase 2 can conveniently access these consented facilities.

- 5.36 In addition, the consented residential area to the west of the site, together with Melksham Town Centre, will provide a broad range of local services and facilities within walking and cycling distance. These include the Water Meadow public house, a Co-op food store, Forest and Sandridge Primary School located off Cranesbill Road, and Melksham Railway Station.
- 5.37 Accordingly, the site benefits from access to a range of day-to-day facilities and services that are readily reachable via sustainable modes of transport. The proposed development is therefore considered to accord with Policy 11 of the JMNP2.
- 5.38 As demonstrated within the Transport Assessment and Framework Travel Plan, the proposed development is acceptable in transport and highways terms. It complies with the key transport tests set out within the NPPF and the requirements of Core Policy 60 and 61 and Policy 11 of JMNP2.

Landscape

- 5.39 There are no statutory or landscape designations within the site or immediate area. There are no non-statutory designations within the site, although a Special Landscape Area lies beyond parts of the north-eastern site boundary.
- 5.40 Paragraph 187 (b) of the NPPF states that planning decisions should contribute to and enhance the natural and local environment by (relevant in this case) *“recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland”*.
- 5.41 This application is accompanied by a Landscape and Visual Impact Assessment (LVIA) prepared by EDP. The proposed development is a landscape-led proposal which has informed the design of the scheme. The LVIA submitted identifies the baseline conditions of the site and surrounding area, whilst determining those landscape and visual characteristics that might inform the design of the proposals, including recommendations for mitigation. An assessment of the landscape and visual effects predict to arise from the proposal is also undertaken.
- 5.42 The LVIA concludes the following:
- The landscape strategy seeks to utilise the site’s existing natural features to create a positive sense of place. Measures include retention of hedgerows and trees, provision of buffer zones around veteran trees, and enhancement of existing landscape features.
 - Proposed enhancements include:
 - A varied 15-20m woodland belt along the southern half of the site’s boundary where Bridleway MELW40 becomes more visually contained and rural in character.

- A varied planted edge along the northern half of the eastern boundary to filter and soften views from the bridleway towards the outward facing settlement edge.
 - A woodland/tree belt to bolster the boundaries around the northern field parcel to filter the proposed development to the immediate south of Lopes Close, in views from Bridleway MELW40 and SLA providing betterment over the existing stark urban edge.
 - Setback of development in the north east to create an undeveloped area of green space.
 - Provision of dark corridors along the Eight Acre Plantation and additional vegetation along the western boundary.
 - A large multifunctional area of public open space in the south, providing a sensitive transition to the wider countryside, retaining rural features and strengthening multi-functional links.
 - Planting proposals to reflect the historic landscape character, including parkland style planting within areas of open space to the north-east and orchard planting within the setting of Blackmore Farm.
 - Additional hedgerow and tree planting, including new riparian tree planting along the tributary.
 - A new connection to Bridleway MELW40/Prater's Lane to improve accessibility to the PRow network.
- In relation to designated landscape areas at construction and operation, the higher land of Spye and Bowood Parklands would experience limited effects due to the well-wooded nature of the SLA, which limits views.
 - Significant effects on landscape character are identified at the site level, including within Host LCA c1 Melksham Clay Vale and Area 3 Open Clay Vale.
 - Significant effects on some visual receptors (full list at para 9.5 of the LVIA) are predicted during the construction stage, primarily due to proximity, and the noise and movement that are associated with construction activities. There would be no significant effects on other visual receptors.
 - Significant effects are predicted at Year 1 on sections of the immediate localised PRow networks, however, these effects reduce as mitigation planting establishes.
 - Some receptors will continue to experience significant effects at Year 15, although these are localised in nature. A full list of the impacted areas is listed in Paragraph 9.12 of the LVIA.

5.43 The LVIA concludes that the site has landscape and visual capacity to accommodate the proposed development as illustrated on the masterplan. While development of a

greenfield site will inevitably result in change and some degree of landscape and visual impact, the assessment concludes that only limited weight should be attributed to this as an adverse effect within the overall planning balance.

- 5.44 The LVIA outlines measures to secure the establishment and long term management of the proposed landscape strategy. This includes a detailed planting design and a Landscape Ecological Management Plan, which can be secured through condition.
- 5.45 The proposed development is considered to accord with Policies 18 and 20 of the JMNP2 and Core Policy 50, 51, 52 and 57 of the Core Strategy.

Biodiversity

- 5.46 Paragraph 187(d) of the NPPF states that planning decisions should contribute to and enhance the natural and local environment by *“minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs”*.
- 5.47 Paragraph 193 states that when determining applications, local planning authorities should refuse applications that cannot adequately mitigate or compensate for significant harm to biodiversity as a result of the development.
- 5.48 The application is accompanied by an Environmental Statement, within which Chapter 7 addresses biodiversity matters. The chapter confirms that there are no statutory or non-statutory designated sites of nature conservation importance within or immediately adjacent to the site. There are, however, ten non-statutory designated sites within 2km of the site, including Eighteen Acre Plantation Local Wildlife Site, located approximately 0.3km to the east and designated for its woodland habitats.
- 5.49 In accordance with Policy 12 of the JMNP2 and Core Policy 50 and 52 of the Core Strategy, the proposed development seeks to retain important existing ecological features and delivery biodiversity enhancements across the site, including:
- Retention of existing hedgerows and associated ditches, where present.
 - Retention of Clackers Brook Tributary and the use of existing culvert crossings.
 - Retention of trees, including three veteran trees.
 - Creation of extensive green infrastructure in the south west and throughout the site, including natural landscaping, hedgerows, allotments/orchards, woodland, spaces for recreational use and Suds.
 - Provision of a structural landscape buffer zone to strengthen habitat connectivity and provide buffers to retained habitats; and
 - Provision of a minimum 15m buffer between the off-site broadleaved woodland and the built development.

- 5.50 In accordance with Policy 13 of the JMNP2, the measures set out in Chapter 7 of the ES demonstrates that the proposed development would deliver a minimum of 10% Biodiversity Net Gain on site.
- 5.51 Overall, the proposed development accords with the biodiversity objectives of the NPPF, Core Policy 50 and 52 of the Core Strategy and Policy 12 of the JMNP2.

Flood Risk and Drainage

- 5.52 A Flood Risk Assessment (FRA) and Drainage Strategy (DS), prepared by Mayer Brown and appended to this submission, conclude that the site is mainly located within the low-risk Flood Zone 1, with areas of Flood Zones 2 and 3 in the southwest. This information has informed the evolution of the proposal, and all developable areas will be restricted to Flood Zone 1, removing the risk of fluvial flooding.
- 5.53 Similarly, the site falls within areas of medium and high surface water flood risk. However, all development will be located in very low to low-risk areas, effectively eliminating the risk of surface water flooding. The site is also at low risk of flooding from groundwater, infrastructure failure, reservoir flooding, and canal flooding. Mitigation measures are listed in Table 7.1 of the FRA & DS and will be incorporated into any permitted development.
- 5.54 Sustainable Drainage Systems (SuDS) are proposed to discharge surface water to the surrounding ditch network via attenuation basins. Runoff will be restricted to greenfield rates with a 30% betterment in accordance with Wiltshire Council's drainage and betterment strategy. The site is divided into three catchments, each with its own attenuation basins, flow control, and outfall to the ditch network running through and around the site.
- 5.55 Foul drainage is proposed to drain by gravity to a foul pump station in the south of the site. From there, it will be pumped to a demarcation chamber in the north, adjacent to the access point onto Sandridge Common, before discharging by gravity into the Wessex Water public foul sewer network.
- 5.56 Overall, the FRA and DS demonstrate that the development can be safely implemented without increasing flood risk to downstream or surrounding areas, in accordance with Core Policy 67 of the Core Strategy and Policy 3 of the JMNP2.

Archaeology and Heritage

- 5.57 An Archaeological and Heritage Assessment has been prepared by EDP in support of this planning application.
- 5.58 The assessment concludes that there are no designated heritage assets on the site that would represent a constraint. However, the site comprises agricultural land with a historic functional association with Grade II listed Blackmore House.
- 5.59 The proposed development has been designed to respect the setting of Blackmore House. Design mitigation has been embedded into the proposals, although changes to the setting to the east and south-east are anticipated due to the change in character

from agricultural fields to residential development. As such, the proposed development is anticipated to result in a low level of less than substantial harm to the designated asset Blackmore Farm. In line with paragraph 215 of the NPPF, this low level of harm will be weighed in the planning balance against the public benefits of the scheme.

- 5.60 Regarding non-designated assets, the archaeological evaluation identified one distinct area containing archaeological features in the southern field of the site, dating to the Romano-British period. The proposed development takes these findings into account and seeks to utilise this area as public open space, with the only intrusive works being attenuation basins as part of the SuDS strategy (as described above). The Applicant understands that any works in this area at the detailed design stage would be subject to an Archaeological Management Plan, secured via a suitably worded planning condition, with any mitigation agreed in advance with the Council's archaeological advisor.
- 5.61 The public benefits associated with the proposed development, including the delivery of market homes (in the context of shortfalls in housing land supply), 30% affordable housing and other economic, social and environmental benefits clearly outweigh the very low level of heritage and archaeological harm identified in this case. In terms of heritage benefits, the Proposed Development provides an opportunity to deliver a minor heritage benefit in the form of a proposed "themed" play area inspired by the 18th century agricultural practices in the north-east edge of the site, as indicated in the Illustrative Masterplan.
- 5.62 Overall, the very low level of harm to the historic landscape and the potential loss of archaeological remains will be considered in line with paragraph 216 of the NPPF.

Arboriculture

- 5.63 An Arboricultural Impact Assessment and tree survey was prepared by EDP, as requested by the tree officer within the pre-app response.
- 5.64 This assessment identified 97 hedgerows, trees or tree groups on the site, of which 12 have been categorised as A (high quality), 19 as B (moderate quality) and 52 as C (low category). Three veteran oak trees have been identified of which an undeveloped buffer zone from 24-27m has been included within the proposal. Where possible, the proposed development has sought to retain existing trees and hedgerows throughout the site and seeks to provide several enhancements.
- 5.65 The proposed development is compliant with core policies 51 and 57 of the Core Strategy, Policy 17 of the JMNP2 and paragraph 136 of the NPPF regarding the RPA and buffer zones for veteran trees. The inclusion of a suitable worded condition regarding mitigation measures would be accepted by the Applicant.

Air Quality

- 5.66 An Air Quality Assessment has been prepared by Cass Allen in support of this application.

- 5.67 The Assessment concludes that no significant impacts on local air quality are anticipated as a result of the proposed development with no requirement for additional mitigation. The site is therefore considered suitable for development in air quality terms, and that there is no technical reason to withhold planning permission on this basis.

Noise

- 5.68 A detailed Noise Assessment has been undertaken by Cass Allen and submitted with this application.
- 5.69 A noise and vibration survey was carried out at the site. Noise levels at the site are dictated by road traffic noise emissions from the A1302. A qualitative assessment of ground-borne vibration levels was carried out at the site and no perceptible vibration levels were identified. Consequently, vibration levels are considered to be acceptable for the development.
- 5.70 The design of the development is considered to be acceptable subject to the adoption of standard thermal double glazing and standard hit & miss trickle ventilators. This can be investigated further at the detailed design stage and may be secured by the imposition of a noise related planning condition by the Local Planning Authority.
- 5.71 Road traffic noise increases because of the development as well as cumulative schemes has been assessed and is shown to result in either no change or minor adverse impacts. These are considered acceptable without the need for any specific acoustics mitigation.
- 5.72 In terms of construction impacts, with the implementation of an appropriate Construction Environmental Management Plan (CEMP) any construction impacts are anticipated to be short-term, direct, temporary minor adverse impacts.
- 5.73 The conclusion is that the site is suitable for the development in terms of noise and vibration levels and that planning permission may be granted subject to the imposition of suitable planning conditions, if considered necessary.

Waste Management

- 5.74 An Outline Waste Management Strategy Plan (OWMSP) has been prepared by Mayer Brown.
- 5.75 It is the intention of the Applicant that waste will be 'designed out' at each stage of the design process for the development and that sustainable waste management facilities and integrated recycling infrastructure will be integral to the final stage. The OWMSP recommends the preparation of a Detailed Site Waste Management Plan (SWMP) and the Applicant will accept this via condition to the planning permission.
- 5.76 The OWMSP sets out assumptions and guidance for Operational Waste Management, and this will be set out in further detail at the Reserved Matters stage. All premises will be designed to accommodate the storage of the following waste streams; domestic, including recycling and household waste.

- 5.77 It is anticipated that the development will comply with the strategic and local waste requirements identified.

Sustainability

- 5.78 An Energy and Sustainability Statement has been prepared by Daedalus Environmental in support of the application. This provides as much detail as is possible at this stage in the planning process to demonstrate that the proposals will achieve the Future Homes Standard and will meet the relevant requirements of Wiltshire's adopted planning framework to create a highly sustainable development.

Summary of Technical Reports and Assessments

- 5.79 The application submission is supported by a full set of technical plans and documents that explain and assess the proposals in detail. Taking into account the above, it is clear that there are no constraints to the residential development of the site that cannot be resolved or satisfactorily addressed by the application proposals. Overall, there would be limited adverse effects arising from the application proposals and these would be outweighed by the substantial benefits delivered. This is expanded on in the Planning Balance and Conclusions Section of this Statement.

6. Planning Obligations

Community Infrastructure Levy

- 6.1 The Wiltshire Council CIL Charging Schedule came into effect on 18 May 2015. The application proposals will be liable for CIL.
- 6.2 The exact CIL revenue will be determined based on an indexed calculation at the point of approval of the application. The application lies within charging Zone 1: Settlement Categories 1, 2 and 3 for the purpose of CIL charging where £85 per square metre is sought for residential developments.

Planning Obligations

- 6.3 Despite the progression of a CIL Charging Schedule, the Council retains the ability to utilise S106 Agreements, mainly with the provision of affordable housing and with predominately site-specific measures that are required to mitigate the impact of development.
- 6.4 Any planning obligations to be secured through S106 are to be considered on a case-by-case basis, having regard to the statutory 'tests' as now amplified within the CIL Regulations. Particular regard should be had to Regulation 122 to the effect that a planning obligation is legitimate only if it is:
- Necessary to make the development acceptable in planning terms;
 - Directly related to the development; and
 - Fairly and reasonably related in scale and kind to the development.
- 6.5 Set out below are draft 'Heads of Terms' for those matters that have been identified as being appropriate for this proposed development, based on information provided by the Council in relation to the previous approved schemes on the site, pre-application discussions with Melksham Without Parish Council / JMNP2 requirements, and arising from the technical reports in our application submission.
- 6.6 Once further details and associated costs are agreed work can commence on the completion of the necessary legal agreements.
- Affordable Housing – 30% in accordance with Core Policy 43 with mix to be agreed;
 - Public Open Space – provision, management and monitoring, including provision of allotments as required by the JMNP2;
 - Education - contributions to Primary and Secondary education places, as identified as needed by the education authority;
 - Healthcare – contributions to fund additional primary care floorspace if required;

- Community Facilities – contribution towards the community hub to be delivered on Phase 1, as requested by Melksham Without Parish Council during pre-application discussions;
- Bus Service Contribution – as required by the JMNP2, and specifically to facilitate the extension of the new town bus service provided by the adjacent site into phase 2;
- Rights of Way – Contribution towards improvements, as required by the JMNP2;
- Public Art contribution;
- Waste and Recycling contribution; and
- Travel Plan – implementation of Residential Travel Plan obligations to help improve the sustainability of the proposed development and support healthy active travel.

7. Planning Balance and Conclusions

- 7.1 This section considers the planning balance in determining whether planning permission should be granted for the proposed development. In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, decisions must be made in accordance with the Development Plan, unless material considerations indicate otherwise.
- 7.2 Whilst the applicant accepts a degree of conflict with policies in the Development Plan, that Plan must be considered in light of Wiltshire's current housing land supply position and also in light of the Plan's overall age and conformity with national guidance.
- 7.3 The Council cannot demonstrate a five-year supply of deliverable housing sites. Furthermore, the Core Strategy is more than five years old and the strategic policies have not been reviewed since their adoption in 2015. In addition, the Core Strategy is now time expired as of the end of March 2026. The strategic policies are, therefore, out of date, thereby triggering the "presumption in favour of sustainable development" under paragraph 11(d) of the NPPF. There are very serious and significant shortfalls in supply that need to be urgently addressed. The weight to be afforded to the conflict with the Council's spatial strategy should be reduced accordingly.
- 7.4 Paragraph 11(d) of the NPPF states that where the most important policies for determining an application are out-of-date, planning permission should be granted unless the application of NPPF policies that protect areas or assets of particular importance provides a clear reason for refusal, or the adverse impacts of doing so would significantly and demonstrably outweigh the benefits.
- 7.5 There are no policies in this case that provide a strong reason for refusing the development proposals. This includes policies related to heritage, as the public benefits outweigh the less than substantial harm identified.
- 7.6 Indeed, the supporting suite of technical and environmental reports confirm that there are limited adverse impacts overall.
- 7.7 Paragraph 14 of the NPPF suggests that where there is a recently adopted Neighbourhood Plan in place which includes allocations to meet an identified housing need the conflicts with the neighbourhood plan are likely to outweigh the benefits of the proposals. For the application site we do not consider that any conflict with the JMNP2 outweighs the benefits of the proposals, we also consider that there are issues with the JMNP's accordance with Part b of paragraph 14 given that the housing requirement identified was based on the emerging Wiltshire Local Plan which is now likely to be abandoned.
- 7.8 In terms of the benefits, the proposed development will deliver up to 275 dwellings in the context of significant shortfalls in housing land supply. Paragraph 61 of the NPPF confirms the Government's objective to significantly boost the supply of housing. The delivery of homes in the context of shortfalls in supply should be a matter that is afforded substantial weight in the planning balance.

- 7.9 The proposals will also secure 30% of the homes as affordable housing. There is a substantial need for affordable homes in Wiltshire and the benefits of new affordable housing will be significant. Improving the supply of affordable homes will mean that households needing affordable housing will spend less time in unsuitable accommodation, and less time bidding for over-subscribed housing. This will improve the lives of those real households who will benefit from the provision of high quality, affordable homes that meet their needs. This is a benefit that should also be afforded substantial weight in the planning balance.
- 7.10 The proposal includes a commitment to deliver a minimum of 10% Biodiversity Net Gain on site. This gain can be secured by planning condition or within the S106. This environmental enhancement should carry substantial weight, providing ecological and landscaping benefits aligned with the principles of sustainable development.
- 7.11 The site is well related to the existing town and immediately adjoins the 'Phase 1' consented site to the west which has outline permission for 500 homes. The proposals will complement this approved growth area to the east of the town and the site itself if a logical 'rounding off' to the settlement given the natural boundary of the bridleway to the east and solar farm beyond.
- 7.12 In response to local feedback the proposal have considered the relationship between the proposed development and existing homes at Lopes Close and the design has evolved and considered how setbacks between properties could be accommodated at the detailed design stage. The site wide approach to design has been landscape led and has a strong emphasis on creating multifunctional open spaces and a connected green infrastructure network, particularly along the eastern boundary. The proposals have been informed by the local context and seek to maximise the opportunities of the site. The information submitted in support of the application demonstrates that the proposed development would deliver a high-quality, comprehensive scheme capable of conserving and enhancing the character, quality and local distinctiveness of the local area.
- 7.13 The proposed development contributes positively to all three dimensions of sustainable development, as defined in the NPPF:
- 7.14 Economic
- Supports economic growth through the creation of direct and indirect jobs during construction.
 - Generates local expenditure associated with the delivery and occupation of new homes.
 - Increases the local population, supporting existing businesses and services in the area.
- 7.15 Social
- Delivers market and affordable homes to meet current and future housing needs.

- Provides a policy-compliant proportion of affordable housing.
- Contributes to social infrastructure through highway improvements and active travel links.
- Includes high-quality design that reflects the local character of Melksham.
- Provides a substantial recreational and community infrastructure including a Local Area for Play (LAP), Local Equipped Area for Play (LEAP), and a Community Orchard and garden, providing opportunities for the member of the community to come together.

7.16 Environmental

- Locates development within walking and cycling distance of key services and public transport.
- Delivers at least 10% on-site Biodiversity Net Gain.
- Enhances biodiversity through habitat creation, a community orchard, bat and bird boxes, and improvement of existing wetland features.
- Provides opportunities to enhance public rights of way, and provide new walking routes through the site, in accordance with paragraph 105 of the NPPF.

7.17 Overall, the presumption in favour of sustainable development is engaged in this case (as set out at paragraph 11 d ii of the NPPF) whereby planning permission should be granted unless any adverse impacts of granting planning permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF when taken as a whole.

7.18 It is clear from our assessment, that the adverse effects in this case do not significantly and demonstrably outweigh the benefits and so this confirms that planning permission should be granted.

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