

PL/2026/04916 – Land west of Semington Road, Berryfield, Melksham

Melksham Without Parish Council – Initial Comments

Melksham Without Parish Council objects to the application.

These are the Parish Council's initial comments. The detailed application documents and consultee responses remain under review and the Parish Council may submit further or amended comments as that work progresses.

1. Current planning context

The Parish Council recognises the implications of Wiltshire's current housing-land-supply position and the planning balance which now applies.

The Wiltshire Core Strategy is now considered out of date in important respects, particularly in relation to housing supply and the current planning balance. At the same time, the **Joint Melksham Neighbourhood Plan 2 (JMNP2)** was made in August 2025 and is the most recent and locally specific Development Plan document for the Melksham area.

The application site was not identified for development through the adopted Wiltshire Core Strategy, JMNP2 or the withdrawn draft Wiltshire Local Plan.

Following withdrawal of the draft Wiltshire Local Plan, JMNP2 remains a particularly important part of the statutory Development Plan for the Melksham area. Although the changed housing-land-supply position and national planning context may affect the weight which can presently be placed on arguments about housing numbers and speculative development alone, JMNP2 remains in force and its policies remain highly relevant to the form and design of development, infrastructure, green space, settlement separation and other locally important planning matters.

MWPC recognises the implications of the current housing-supply position and the weight which housing delivery carries in the planning balance. However, **the existence of a housing-land-supply shortfall does not mean that every location put forward for major development is necessarily appropriate**, nor does it remove the need to consider how individual proposals fit into the long-term planning of the wider Melksham area.

MWPC also notes that the 2025 Housing Delivery Test records Wiltshire's delivery at **93% of its housing requirement**. The Housing Delivery Test result does not provide a separate justification for speculative housing development.

MWPC acknowledges that Wiltshire Council cannot currently demonstrate a five-year housing land supply. However, **this does not displace the statutory Development Plan or mean that unallocated development should automatically be approved**.

JMNP2 was made in August 2025, contains allocations intended to meet its identified housing requirement and forms part of the statutory Development Plan. Where this proposal conflicts with JMNP2, MWPC considers that the relevant policy conflict and the particular planning harm arising from the proposal should form part of the assessment of the application.

The Parish Council is therefore assessing this proposal on its individual merits, while also considering its cumulative effects and how it fits within the wider planning and infrastructure needs of Berryfield and the Melksham area.

2. Scale and capacity of the site

The Parish Council is concerned that **up to 225 dwellings is too large a scale of development for this site**, particularly when considered alongside the cumulative growth already experienced and committed around Berryfield.

The site must accommodate significantly more than housing. It must also provide meaningful public open space, structural landscaping, the safeguarded Melksham Link Canal corridor, existing public rights of way, drainage, ecological mitigation and enhancement, walking and cycling connections, play and recreation provision and an appropriate relationship with the surrounding landscape and settlements.

The Parish Council considers that the genuine capacity of the site should therefore be established after proper provision has been made for all of those requirements and after unacceptable planning harm has been avoided.

If that results in a capacity below 225 dwellings, the number of dwellings should be reduced accordingly.

The Parish Council notes that the scheme presented before the application was submitted was approximately 195 dwellings. The subsequent increase reinforces the Parish Council's concern about site capacity, but its objection is to the **overall scale of 225 dwellings**, not simply to the fact that the number has increased.

3. Cumulative development – Berryfield and the wider Melksham area

The Parish Council recognises that this application must be assessed on its own merits. However, the effects of the proposal should not be considered in isolation.

MWPC considers that the cumulative assessment should take account of development already completed, development under construction, existing planning permissions, allocations, live planning applications, significant known pre-application proposals and other reasonably foreseeable development.

This is particularly important at Berryfield, where substantial development has already taken place and further growth is permitted, under construction or progressing through the planning system.

Viewed individually, each development may appear capable of being accommodated. Viewed together, however, the combined effect can be materially different, including greater pressure on highways, schools, healthcare, drainage, public transport, community facilities, open space and other infrastructure, together with effects on landscape, settlement identity and the amount of remaining open countryside.

The Parish Council therefore asks Wiltshire Council to assess PL/2026/04916 both on its individual merits and in the context of the cumulative effects of relevant development across Berryfield and the wider Melksham area.

Cumulative assessment should also consider the need for coordination between adjoining, nearby or functionally related developments. Separate applications should not result in fragmented or conflicting access arrangements, junction designs, walking and cycling links, public transport provision, community infrastructure, open space, landscaping or other mitigation.

4. Berryfield and the location of development

Berryfield is identified as a Small Village in the Wiltshire Core Strategy.

The application site lies outside the defined settlement area to which **JMNP2 Policy 6** directs housing development and the proposal therefore needs to be considered against that policy and the wider Development Plan framework governing the location of housing.

The Parish Council recognises that the current housing-land-supply position affects the weight which may be given to policies concerned with the distribution of housing. However, Policy 6 remains part of the Development Plan and should form part of the assessment of this proposal.

The scale of the proposal must also be considered in the context of Berryfield's existing character and the substantial amount of residential development which has already taken place around the village.

5. Building height, density and character

The Parish Council objects to the inclusion of three-storey development.

The surrounding development at Berryfield, including along Semington Road and at Bowood View, comprises **bungalows and predominantly two-storey housing**. Introducing substantial areas of three-storey housing on this settlement edge would therefore increase the prominence and urbanising effect of the development and would not reflect the prevailing scale of surrounding residential development.

The Parish Council considers that **two storeys should be the maximum building height throughout the site**, with the detailed mix and form of development responding appropriately to the lower-rise character of Berryfield, including its existing bungalows.

Building upwards should not be used as a means of achieving the maximum housing number where doing so would adversely affect the character, appearance or landscape impact of the development.

The layout and density should instead respond to the genuine capacity of the site, its landscape setting, the canal corridor, open space and the need to retain meaningful separation between settlements.

6. Outline application and parameter plans

As this is an outline application, the Parish Council considers that the key spatial parameters must be fixed at this stage rather than deferred to reserved matters.

These should include maximum building heights, the extent and location of built development, housing density parameters, access arrangements, principal movement routes, pedestrian and cycle connections, public rights of way, public open space, green infrastructure, structural landscaping, drainage areas, the safeguarded canal corridor and the areas necessary to maintain meaningful separation between Berryfield and Melksham.

The Parish Council would be concerned if permission for up to 225 dwellings were granted without sufficient certainty that all of these elements can be accommodated satisfactorily within the site.

The capacity of the site should be derived from its constraints and infrastructure requirements rather than those requirements being fitted around a predetermined housing number.

7. Separation between Berryfield and Melksham

The Parish Council considers the remaining physical and perceptual separation between Berryfield and Melksham to be a major planning consideration.

The Parish Council recognises that, following examination, the Melksham–Berryfield gap was removed from the areas specifically identified in Policy 19.

However, the Examiner did not conclude that the remaining land between Melksham and Berryfield was therefore suitable for development. The Examiner’s findings did not mean that the remaining land should simply be treated as available for development, and the supporting text retained the need to balance development at settlement edges against the need to ensure the ongoing separation of settlements.

That distinction is important.

Since the examination of JMNP2, further development permissions have reduced the amount of undeveloped land between Berryfield and Melksham. In the Parish Council’s planning judgment, that makes the remaining open land **more important, not less important**, in maintaining the physical and visual distinction between the two settlements.

Previous losses should not create an incremental justification for further development until no meaningful separation remains.

The application should therefore be assessed carefully in terms of the remaining physical separation, the visual and perceptual relationship between the settlements, the openness of the remaining land, important views across and through the site, the urbanising effect of up to 225 dwellings and the cumulative effect of previous and proposed development on settlement identity.

Core Policy 51 requires consideration of the separate identity of settlements, their landscape settings, the transition between built development and countryside and important views.

The Parish Council does not consider landscaped public open space within a housing development to be equivalent to the existing open countryside which currently contributes to the separation between Berryfield and Melksham.

8. Melksham Link Canal corridor

The safeguarded route of the **Wilts & Berks Canal Melksham Link** is an important feature running through the site and should be treated as significant green and blue infrastructure and as a key structuring element of the development, rather than as residual land within the layout.

The development must not prejudice the future delivery of the canal.

The layout should demonstrate clearly how the safeguarded corridor is protected, how sufficient land is retained for the future canal and associated infrastructure, and how the adjoining development, open space, drainage, walking and cycling routes and landscaping relate positively to it.

The application should also demonstrate how ecological, landscape and recreational functions will be incorporated, how drainage features will relate to the eventual canal and how the corridor will be owned, managed and protected in the long term.

The Parish Council is concerned that the canal corridor should not simply become a narrow landscaped strip between areas of housing.

Where development of this scale includes the safeguarded canal route within the site, the opportunity should be taken to secure meaningful progress towards the canal project and the associated walking, cycling, ecological and recreational benefits.

9. Semington Road and cumulative highway impact

The Parish Council is concerned about the additional vehicle movements which would arise from up to 225 dwellings onto Semington Road.

The highway assessment should consider the proposal alongside existing and committed development in Berryfield and the wider Melksham area rather than assessing the site in isolation.

Particular consideration should be given to cumulative effects on Semington Road, the A350, the A350/A365 junction, routes towards Melksham town centre and Bowerhill, peak-hour congestion, school travel periods and the interaction between residential traffic, commercial traffic and HGV movements.

The assessment should use realistic assumptions about other completed, committed and reasonably foreseeable development and should demonstrate clearly how those developments have been incorporated into the modelling.

10. Semington Road walking, wheeling and cycling improvements

The Parish Council commissioned **Sustrans, now the Walk Wheel Cycle Trust**, to undertake a holistic review of Semington Road.

Semington Road forms part of National Cycle Network Route 403, which further reinforces the importance of providing safe and attractive conditions for walking, wheeling and cycling along the corridor.

The Sustrans/Walk Wheel Cycle Trust review notes that Semington Road forms part of National Cycle Network Route 403, while also identifying existing deficiencies in the corridor and the additional pressures arising from current and planned residential development.

The review found that pedestrian provision along Semington Road is inconsistent and below standard, with footways frequently narrow, uneven or absent. It also records people walking in the carriageway, including with buggies, because of the lack of adequate footway space.

The review also found that existing traffic speeds and volumes make mixed-traffic cycling unsuitable on significant parts of the corridor and that additional development could worsen those conditions.

The Sustrans recommendations include:

- reducing vehicle speeds to approximately **20 mph**, supported by physical traffic-calming measures;

- progressive widening of footways;
- a **signal-controlled toucan crossing on the western arm of the A350 roundabout**, on the established desire line towards Aloeric Primary School;
- additional safe crossing points along Semington Road;
- a traffic-free walking and cycling route, potentially delivered substantially through adjoining development land, or further consideration of a modal filter;
- improved crossings at development access points;
- direct and accessible connections into the wider walking and cycling network;
- improved public realm, seating, bus-stop facilities and wayfinding; and
- Section 106 contributions from development towards wider corridor improvements.

The review specifically recommends that future development fronting Semington Road should safeguard sufficient land for wider footways, contribute towards strategic walking and cycling provision, provide direct connections into the wider network, deliver high-quality crossings at site accesses and contribute towards wider corridor improvements.

The Parish Council therefore considers that this application provides a direct opportunity to deliver these improvements.

It would not be sufficient merely to acknowledge or cost the Sustrans recommendations. Where measures are necessary to make the development safely and sustainably accessible, there should be a clear mechanism for securing, funding and delivering them.

The Parish Council asks Wiltshire Council to provide the **Sustrans/Walk Wheel Cycle Trust report to the highway officer commenting on this application**. The report has not yet been shared with that officer. If Wiltshire Council is unable to forward it internally, MWPC asks to be advised who the relevant highway officer is so that the Parish Council can provide the report directly.

The Parish Council also asks for early confirmation of which recommendations Wiltshire Council considers capable of being secured through this application, and what further evidence, specification or design work is required for any of the relevant measures to be included within the Section 106 heads of terms.

11. Wider transport network

The scale of development proposed at Berryfield should also be considered in the context of the wider transport network serving Melksham.

The Parish Council is particularly concerned that successive developments should not each be assessed on the basis that they generate only a proportion of the additional traffic using already constrained routes and junctions.

Where impacts arise cumulatively, the necessary mitigation should also be considered cumulatively and should provide a coherent solution rather than a series of unrelated individual measures.

12. Department for Transport Connectivity Tool

If Wiltshire Council or the applicant relies upon the Department for Transport Connectivity Tool in assessing the sustainability of the site, the Parish Council considers that the result needs to be properly explained.

This should include the overall score, component scores, methodology used, the benchmark against which the score is being judged and what the score actually means in planning terms.

A numerical score should not substitute for an assessment of actual accessibility on the ground.

That assessment should include frequency and hours of bus services, evening and Sunday provision, reliability, access to Melksham railway station, access to employment at Bowerhill, safe walking and cycling routes, the effect of barriers such as the A350, and access to schools, healthcare, shops and other everyday services.

13. Public transport and connections to Melksham railway station and Bowerhill

The Parish Council considers that a development of up to 225 dwellings should make a meaningful contribution towards improved public transport provision.

This should include service frequency, evening and weekend provision and the long-term viability of services serving Berryfield.

The Parish Council would particularly like consideration to be given to a development-supported bus connection linking the Semington Road/Berryfield area with **Melksham railway station, Bowerhill Industrial Estate and other employment areas, and local medical and community facilities.**

Development funding could potentially be used to pump-prime/fund the initial operation of an improved service, subject to the relevant planning-obligation tests and agreement with the transport authority and operators.

Safe and direct routes should also be provided to bus stops, with appropriate shelters, proper seating, raised kerbs where required and provision for real-time passenger information.

14. Travel Plan

Any Travel Plan associated with the development should contain measurable targets, monitoring arrangements and a clear mechanism for remedial action if those targets are not achieved.

The Parish Council is concerned about Travel Plans which rely upon aspirational targets such as car sharing or modal shift without any meaningful response if those targets are missed.

Measures relied upon as mitigation should be properly funded, capable of being delivered and subject to ongoing monitoring.

15. Public rights of way and recreational routes

The Parish Council welcomes the intention to retain and enhance existing public rights of way, but further detail is required about what those enhancements would involve.

The development should provide an integrated network of attractive, direct and accessible walking and cycling routes connecting with:

- the existing public-rights-of-way network;
- Berryfield;
- Berryfield allotments;
- Semington Road;
- Melksham town centre;
- local schools;
- adjoining developments;
- the **Kennet and Avon Canal**;
- **the river**; and
- the future **Wilts & Berks Canal towpath forming part of the Melksham Link**.

The Parish Council would also like specific consideration to be given to improvements to existing rights of way leading towards the river and the Kennet and Avon Canal. Some existing routes currently pass through a farm, and the Parish Council would like to explore whether appropriate diversion or realignment could provide a safer, more attractive and more usable recreational route, subject to the necessary legal process and agreement with affected landowners.

The layout should include opportunities for circular recreational routes and should avoid creating isolated paths or routes which terminate without a useful onward connection.

Routes should be appropriately surfaced, sufficiently wide, accessible and suitable for year-round use, with appropriate seating, bins, wayfinding and long-term maintenance arrangements.

The developer should meet the costs of any necessary path diversions, dedications, legal orders or off-site works arising from the development.

16. Education, early years and safe journeys to school

The Parish Council is particularly concerned about how the primary-school and early-years needs generated by this development would actually be met.

Wiltshire Council's Education consultation response identifies a requirement arising from the development for **64 primary-school places, 45 secondary-school places and 27 early-years places**.

The same response is explicit that there are **no places currently available across the in-area primary schools** and that there is **no spare capacity across the designated schools for this development**.

The Parish Council considers that this raises a fundamental question:

Where will the primary-school children generated by up to 225 dwellings actually go to school?

The Education response identifies Aloeric as the nominal designated primary and also refers to Bowerhill, Forest & Sandridge CE, River Mead, The Manor, Semington St George and a planned primary school as being within a two-mile safe walking route.

However, the Parish Council has significant concerns about the practical reality of those options.

The Parish Council understands that the proposed **Pathfinder school has planning permission**, but that there is no current intention to build it. It therefore cannot presently be treated as a certain solution.

The Parish Council also understands that Wiltshire Council's preferred future primary-school provision is associated with **Blackmore Farm**. However, there is currently no planning application for that school and the surrounding housing development has not yet progressed to reserved-matters approval.

There is therefore no certainty as to when that school would be delivered.

The present application is on the south-western side of Melksham whereas Blackmore Farm is to the north-east. The Parish Council does not consider it realistic to assume that primary-school children from this development would routinely walk across the town to a school at Blackmore Farm. In practice, such a journey is likely to be made by car.

For **Semington St George Primary School**, the driving route is also materially different from a simple distance measurement because of the bus gate by the canal. Parents travelling by car cannot simply continue directly across the bridge but would need to return to the A350 and travel around to access Semington from the other side, a journey of 2.5 miles compared with the direct route of 1.4 miles.

For **Aloeric Primary School**, the Parish Council notes that the school does not provide early-years provision. Families with nursery-age and primary-age children may therefore need to make separate journeys to different settings.

The Parish Council also notes that Aloeric is participating in a school-streets trial using ANPR controls at the entrance to St Michael's Road. The need for such traffic-management measures is relevant to the consideration of existing vehicle movements and school drop-off conditions at that location.

Schools such as **Forest & Sandridge CE Primary School** are on the north-eastern side of Melksham and again would involve substantial cross-town journeys from this south-western development.

The Parish Council therefore does not consider that identifying a school as being within a nominal two-mile distance is sufficient.

Assessment should consider the actual journey families would need to make, including crossings of the A350 and other major roads, existing congestion, school-run traffic, bus-gate restrictions, narrow or missing footways, the needs of younger children, pushchairs, scooters, adapted cycles and linked journeys involving children attending different settings.

The Parish Council does not consider that a financial contribution alone resolves these concerns.

The Education response seeks **£1,200,512** towards the 64 primary-school places and **£473,094** towards 27 early-years places.

The application still needs to demonstrate where those places will physically be provided, when they will be available and how children will reach them safely and practically.

The Parish Council notes that the Education response currently concludes that Melksham Oak has sufficient secondary capacity and does not seek a secondary-school contribution.

However, the Parish Council requests confirmation that this assessment has taken full account of the cumulative effect of all relevant current development proposals across the Melksham area, including live planning applications which have not yet been determined, as well as development already approved, under construction or otherwise committed.

17. Drainage, groundwater and flood risk

The Parish Council remains concerned about existing drainage and groundwater issues in the Berryfield area.

The application should fully assess conditions affecting both the site and surrounding land and property.

Particular consideration should be given to known concerns around the Berryfield Park/Semington Road junction, Berryfield Lane near the New Inn, Berryfield Brook and surrounding properties and land.

The development must not increase flood risk elsewhere.

Where works associated with the development provide a reasonable opportunity to improve existing off-site drainage or flooding problems, the Parish Council considers that those opportunities should be investigated and, where appropriate, incorporated into the scheme.

This is consistent with **JMNP2 Policy 3 – Flood Risk and Natural Flood Management**, which requires development not only to avoid increasing flood risk but also, where opportunities arise, to help address wider existing flood-risk issues.

Further information is also required about any permanent water features proposed within the safeguarded canal corridor, including their function, safety, water quality, maintenance, ownership and relationship with the future canal.

18. Landscape, trees, hedgerows and biodiversity

The application should demonstrate how the development responds to the landscape character of the site and its position between Berryfield and Melksham.

Existing trees and hedgerows should be retained wherever possible and incorporated as meaningful features within the green-infrastructure network.

The Parish Council is concerned about important trees or hedgerows being placed within private rear gardens, where there may be no reliable mechanism to secure their long-term management, retention or replacement.

Important landscape features should therefore be located within areas subject to appropriate long-term management arrangements wherever possible.

New landscaping should be structural and substantial enough to perform a genuine landscape function.

The development should deliver biodiversity enhancement through a connected network of habitats and wildlife corridors.

Detailed proposals should include appropriate features such as bird bricks, bat bricks, bee bricks, reptile refuges where appropriate, native planting, connected habitat corridors and appropriate long-term ecological management.

19. Green infrastructure and public open space

Public open space should be meaningful, usable and appropriately located.

It should not consist primarily of land which cannot be developed because it is required for drainage, the canal corridor or other constraints.

The development should provide a connected network of green infrastructure linking open space, the canal corridor, public rights of way, ecological features and the wider countryside.

The design should avoid excessive urbanisation of remaining open areas through drainage structures, formal play equipment, lighting, fencing or other infrastructure.

Clear arrangements will be required for ownership, management and maintenance.

20. Community facilities and recreation

A development of up to 225 dwellings will create substantial additional demand for community facilities and recreation provision in Berryfield.

Berryfield Village Hall was delivered with Section 106 funding arising from the Bowood View development, also developed by Bellway, together with other funding secured by the Parish Council, including Community Infrastructure Levy funding.

Bowood View comprised around 150 dwellings. The Parish Council considers it appropriate that a further development of up to 225 dwellings should make a substantial contribution towards expanding and improving community facilities for the growing Berryfield population.

The Parish Council would specifically wish to see improvements to Berryfield Village Hall, including a covered outdoor community area, patio doors providing a direct connection between the hall and the outside space, tables and chairs for outdoor community use and associated works to make the external area a practical extension of the hall.

The development should provide appropriate formal play and recreation provision, including **LEAP provision and, having regard to the scale of the development and cumulative growth at Berryfield, consideration of whether NEAP provision is required.**

The Parish Council would wish to be offered **first refusal on the ownership and management of LEAP and NEAP provision** so that it can consider whether to take those facilities on for the benefit of the local community. The Parish Council would not wish to take on LAP provision.

Provision should also address the needs of older children and teenagers, including informal recreation space, a multi-use games area, social seating, covered or sheltered space and appropriate contributions towards wider formal recreation provision, including **3G pitches and similar facilities.**

The Parish Council is also increasingly concerned that **Berryfield has no shop or other local retail provision at all**. As the population continues to increase, the absence of basic day-to-day facilities becomes progressively more significant.

A development of up to 225 additional dwellings should therefore be considered in the context of the community infrastructure required for a substantially enlarged Berryfield population rather than simply providing housing and minimum on-site play provision.

21. Healthcare

The Parish Council is concerned that the healthcare impact of the development needs to be assessed against the actual capacity and needs of the GP practices serving the Melksham area.

The Parish Council understands that, for a healthcare contribution to meet the relevant planning-obligation tests, the local healthcare provider needs to identify a sufficiently specific project or item of infrastructure to which the contribution would be directed.

This issue arose in relation to the Berryfield Lane application (PL/2025/00626), where the healthcare request put forward did not meet the required test.

The Parish Council has therefore asked for greater clarity about what information and level of specificity are required from local GP practices in order for a healthcare contribution to be considered acceptable and capable of being secured through a Section 106 agreement.

The Parish Council is aware that **NHS Wiltshire Property/Estates is currently experiencing staffing difficulties, including long-term sickness**, which may make it more difficult for the necessary healthcare infrastructure request to be prepared within the planning timetable.

The Parish Council would therefore like the **local GP Primary Care Network to be invited to provide the necessary evidence directly**, identifying the current pressures on local practices, the additional demand arising from this development and the specific project or provision required to mitigate that demand.

The Parish Council would be concerned if the absence of a sufficiently detailed healthcare request were treated as evidence that no mitigation is required where the difficulty lies in the ability of the relevant NHS property/estates function to submit the necessary information rather than in an absence of local healthcare need.

22. Construction traffic and construction-related disruption

The Parish Council considers that Berryfield Lane and its junction with the A350 should not be used as a construction access or as a general vehicular access to the development.

This should apply to construction vehicles, contractors' vehicles, deliveries and temporary traffic arrangements.

If an emergency access is proposed from Berryfield Lane, it should be designed and legally controlled so that it cannot subsequently become a general residential access.

A Construction Traffic Management Plan should be agreed before development begins and should include approved construction routes, hours of operation, arrangements for deliveries, wheel washing, highway-condition surveys and obligations to repair damage caused by construction traffic.

Traffic management associated with construction works and utility connections on **Semington Road** should also be planned so that existing bus services are not unnecessarily disrupted or prevented from operating.

The Parish Council has experienced previous development works where utility and other connection works have interfered with bus journeys for prolonged periods.

This has a particularly significant effect on **less mobile residents of Berryfield, including residents of the mobile home park**, who may rely on the bus to reach day-to-day services in Melksham town centre and may not have access to a car.

The Construction Traffic Management Plan should therefore include arrangements for maintaining bus access and continuity of service during construction and utility works, with any unavoidable temporary disruption kept to the minimum possible period and communicated clearly in advance.

23. Sustainable design, energy and housing quality

The Parish Council expects the development to incorporate a high standard of sustainable design.

This should include energy-efficient homes, solar generation, battery-ready infrastructure, electric-vehicle charging, high-quality walking and cycling provision, streets designed to support a self-enforcing 20 mph environment and biodiversity features integrated into buildings and the wider layout.

Affordable housing should be distributed throughout the development and should be tenure blind.

24. Timing and delivery of infrastructure

The Parish Council considers that necessary infrastructure should be delivered before it is required by the occupation of the development.

Essential highway, walking, cycling, drainage, public-transport and rights-of-way works should therefore be completed before first occupation or in accordance with an early and clearly defined occupation trigger.

The Parish Council would not support a situation in which homes are occupied first and the infrastructure needed to serve them follows substantially later.

There should be clear phasing and delivery arrangements identifying what infrastructure is required, who will deliver it, how it will be funded, when it will be delivered and what occupation limits will apply if delivery is delayed.

25. Planning obligations, mitigation and early engagement

If Wiltshire Council is minded to approve the application, the Parish Council considers that the necessary mitigation should be secured through robust planning conditions and a Section 106 agreement.

The Parish Council recognises that any Section 106 obligation must satisfy the relevant statutory and policy tests.

What MWPC is seeking is clear and early guidance from Wiltshire Council as to what evidence, level of detail and form of request are required in order for proposed mitigation to be properly considered and, where justified, secured.

This is particularly important for this application because the Parish Council is seeking mitigation in a number of areas, including highways and active travel, public transport, education, healthcare, community facilities, play and recreation, public rights of way, green infrastructure and the canal corridor.

The Parish Council has previously made mitigation requests on major applications only to discover late in the determination process that a request had not been included within the proposed Section 106 package or was considered not to meet the necessary test.

MWPC has therefore asked Wiltshire Council to clarify why previous requests have not been secured, what evidence is required from the Parish Council or other bodies, and how requests need to be framed so that they are made in the right form, with the right evidence and early enough in the process.

This is directly relevant to the **Semington Road walking, wheeling and cycling measures**. The Parish Council commissioned the Sustrans/Walk Wheel Cycle Trust review using the organisation recommended by Wiltshire Council Highways and specifically asked that work to consider potential Section 106 mitigation.

MWPC now wishes to understand precisely what Wiltshire Council requires in order for appropriate measures identified through that work to be included within the heads of terms for this application.

The Parish Council asks Wiltshire Council to ensure that the Sustrans/Walk Wheel Cycle Trust report is shared with the **highway officer commenting on this application**. The report has not yet been shared with that officer. If Wiltshire Council is unable to forward it internally, MWPC asks to be advised who the relevant highway officer is so that the Parish Council can provide the report directly.

The same principle applies to **Berryfield Village Hall**. The Parish Council has previously been advised that further detail was needed to support a community-facilities request and subsequently obtained indicative costs.

For the present Bellway application, MWPC is considering a specific and deliverable package of improvements to the hall and is willing to obtain more detailed drawings, specifications and costs if that is what Wiltshire Council requires.

Likewise, in relation to **healthcare**, the Parish Council wishes to understand exactly what the local GP practices or appropriate NHS body must provide for a healthcare request to be capable of being secured, including who must make the formal request and what level of specificity is needed.

The Parish Council would welcome **early visibility of the emerging Section 106 heads of terms before the application is determined**, so that it can understand which mitigation requests are being taken forward, which are not, the reasons why, and whether any further evidence can still be supplied in time.

Where several developments contribute to the same cumulative problem, Wiltshire Council should also consider how lawful contributions can be coordinated so that they deliver coherent improvements rather than disconnected individual measures.

26. Overall planning balance

The Parish Council recognises the current housing-land-supply position and that the delivery of additional housing carries very substantial weight.

Its objection is therefore not based simply on the fact that the site is unallocated or that additional housing is proposed.

The Parish Council's concern is whether **up to 225 dwellings can be accommodated on this particular site without unacceptable harm**, having regard to the genuine capacity of the site, cumulative development around Berryfield and Melksham, settlement separation, landscape and visual impact, the safeguarded canal corridor, highway and transport effects, walking and cycling, public transport, education, drainage and flood risk, healthcare, community facilities, green infrastructure, biodiversity and the timely delivery of the infrastructure and mitigation necessary to support the development.

The Parish Council considers that these matters require rigorous assessment and should not be outweighed simply by the numerical contribution of up to 225 dwellings.

27. Conclusion

For the reasons set out above, Melksham Without Parish Council objects to PL/2026/04916.

These are the Parish Council's initial comments. The detailed application documents and consultee responses remain under review, and the Parish Council intends to submit further or amended comments as that work progresses.