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**Melksham Neighbourhood Plan Steering Group  
c/o Office at Melksham Without Parish Council**

The Sports Pavilion  
Westinghouse Way  
Bowerhill  
Melksham  
Wilts  
SN12 6TL

27<sup>th</sup> July 2020

Dear Sir/Madam

**Representations to the Draft Melksham Neighbourhood Plan – Regulation 14  
On behalf of Hollins Strategic Land**

This letter provides Hollins Strategic Land's representations in response to the draft version of the Melksham Neighbourhood Plan (MNP) under Regulation 14 of the Neighbourhood Planning (General) Regulations 2012.

These representations focus on land at Semington Road, Melksham (location plan, Appendix 1) which is considered to present an appropriate and sustainable location for residential development, capable of accommodating up to 144 new homes and is subject to the current planning application ref: 20/01938/OUT (Indicative Layout Plan, Appendix 2). This representation sets out our view that the evidence base, which supports the Melksham Neighbourhood Plan, should be reviewed to correct a number of errors relating to Land at Semington Road, prior to submission of the Plan for examination.

**Melksham Neighbourhood Plan**

We support the Steering Group's intention to ensure that there is synchronicity between the emerging Wiltshire Local Plan process and the Joint Melksham Neighbourhood Plan. This is a suitable and well-considered approach, and will ensure that due consideration is given to developing the strategy that will underpin the Neighbourhood Plan.

The Vision articulated within the draft Neighbourhood Plan is also supported, in that it sets out a vision of Melksham as a vibrant place in which to live and work, with community facilities sustained and sustainable development encouraged. We support the Plan in that it will aim to balance the needs of today whilst managing the challenges of the future. It is also clear in that necessary housing growth in Melksham forms a key part of

the vision. This will also enable the other aspirations outlined in the Vision to be achieved, particularly in respect of improving and expanding retail and other facilities in the town, and to maintain Melksham as an attractive location for businesses to locate to.

Equally the objectives outlined in the draft Plan are also supported. These provide a basis through which the articulated Vision can be delivered, and set out how sustainability, the delivery of housing and the creation of locally distinctive and high-quality environments can be achieved.

### Site Assessment Summary Report

To support the draft Neighbourhood Plan, a Site Assessment Summary Report has been prepared by AECOM (dated September 2018). The individual assessments of each site considered are set out at Appendix A of this report. Nexus consider the Site Assessment process undertaken by AECOM, to be flawed and accordingly the evidence base should be reviewed prior to submission of the Neighbourhood Plan for examination.

Within AECOM's assessment, Site 22 'Land at Semington Road, Berryfield' was considered to have significant constraints, and as such "unsuitable" to take forward for the purposes of the Neighbourhood Plan. Firstly, the validity of the findings of the Site Assessment and the methodology used in order to reach the conclusions must be questioned. In particular, we note the following inconsistencies in the assessment of Land at Semington Road (Site 22):

#### *Context*

***AECOM Site Assessment Report Statement:*** *There is a sewage plant to the north of the site, residential properties to the west, agricultural land to the south and east.*

**Nexus Planning Response:** The Site is bound to the south by existing business/employment premises around Hampton Park West. Furthermore, the Site is immediately bound to the east by the A350, confirming the Site is well contained by either existing development or roads, not agricultural land.

#### *Suitability*

***AECOM Site Assessment Report Statement:*** *Contingent with development at Semington Road, but separate from the rest of the town. The development would relate to the residential properties located to the west of the site; however, development would be a contrast to the agricultural land located to the south and the east of the site.*

**Nexus Planning Response:** To the south of the site are existing business/employment premises around Hampton Park West (not agricultural land) and to the west extends an existing residential area around Berryfield Lane and Semington Road. Land to the north benefits from planning approval for 150 dwellings and a village hall (17/12514/REM). This has resulted in a continuous line of development along Semington Road between the site and Melksham, and thus confirms the suitability for residential development in this location. Accordingly, the Site cannot be considered as 'separate' from the rest of the town.

***AECOM Site Assessment Report Statement:*** *There used to be access into the site from Semington Road, however access is now achieved via the A350.*

**Nexus Planning Response:** Access to the site is not currently achieved via the A350. Rather, access to the Site is currently achieved via Shails Lane to the South of the Site and via Semington Road to the West of the Site. In respect of the planning application for the Site, which is currently pending determination (20/01938/OUT), Sustainable Transport at Wiltshire Council have confirmed that satisfactory vehicular access in to the site from Semington Road can be achieved.

### *Community facilities and services*

The Site Assessment includes a site-specific review of distances between sites and community facilities and services, including shops, public transport interchanges, schools and medical facilities. Table 1 shows a review undertaken by Nexus of Site 22 (HSL Site -Land at Semington Road, Melksham) and the distances from them to key facilities and services.

**Table 1: Nexus review of Community facilities and services for Site and 22**

What is the distance to the following facilities (measured from the site centre)	Site 22: Berryfield, land at Semington Road	
	Distance (metres)	Distance (metres) (Nexus review)
Town / local centre / shop	400-800	400-800
Public transport e.g. Train Station or Bus Stop (with at least a half hourly service during the day)	<400	<400
School(s)	>800	>800
Open Space / recreation facilities	>800	<400 – area of equipped play at Berryfield Park to west of site
Health Centre facility	>800	>800
Cycle route	<400	<400

A review of the distances provided for land at Semington Road has shown that open space and recreation facilities are located within 400 metres of the site (at Berryfield Park to the west of the site). Crucially Site 22 is located less than 400 metres from a bus stop, which benefits from at least a half hourly services during the day. This service provides regular access to the Town Centre and a range of services such as schools and medical facilities within Melksham.

### *Availability*

**AECOM Site Assessment Report Statement:** *In terms of availability, the Site Assessment concludes for Site 22 "Unknown – to be confirmed by client"*

**Nexus Planning Response:** It is unclear why availability of Site 22 has not been confirmed by the Town/Parish Council. Hollins Strategic Land and Nexus Planning have held meetings with both the Town/Parish Council, and have made submissions on this site making it clear the site is available for development, suitable and achievable during the plan period. Furthermore, the Site has been submitted to the Local Planning Authority for consideration as part of the Strategic Housing and Economic Land Availability Assessment (SHELAA) under site reference 691, confirming the Site is available for development.

The site's availability has been further demonstrated through submission of a planning application for 144 dwellings (ref: 20/01938/OUT). The illustrative layout submitted in support of application 20/01938/OUT shows

how a residential development of 144 dwellings can be delivered to preserve mature trees along the northern and eastern site boundaries, provide for large areas of natural open space, a Habitat Protection Area, a Local Equipped Area for Play and a Teen Shelter/Outdoor Gym.

### *Conclusion*

***AECOM Site Assessment Report Statement:*** *In terms of a conclusion, the Site Assessment provides Site 22 has "significant constraints"*

**Nexus Planning Response:** It is unclear why AECOM have come to the above conclusion for Site 22, considering that no "significant" constraints have been identified within AECOM's assessment of the Site. Conversely, AECOM's assessment finds:

- Development would be contingent with development at Semington Road
- The Site is accessible from the highway network
- The Site is not impacted by any statutory environmental considerations
- There would be no heritage impacts in developing the site
- The site is within 400-800m of a town / local centre / shop and bus stops are located within 400m of the Site
- The Site lies within flood risk zone 1 (the lowest) and is not impacted by TPOs, contamination or significant infrastructure
- The Site is flat and there are no landscape and visual impacts due to the constrained nature of views into and out of the site

### AECOM Site Assessment Report Summary

The findings of AECOM's Site Assessment are then considered within a Summary Report. For Site 22 it is found that *"although the site is relatively unconstrained, the planning approval for 150 dwellings through application 17/12514/REM is a significant barrier. As such, the site is considered to be unsuitable to take forward for the purposes of the Neighbourhood Plan"*.

It is unclear how the planning approval to the north of the site represents a 'significant barrier', considering that the northern boundary of the site is formed by Berryfield Brook, Bowerhill Wastewater Treatment Works and a dense line of mature vegetation. The approval of 17/12514/REM is not a significant barrier to development; rather it demonstrates that development to the south of Melksham adjacent to Semington Road is entirely sustainable location, suitable for growth.

No justification is provided by AECOM in their assessment to support their view an approved residential scheme represents a significant barrier. Accordingly, it is requested the statement be removed from the Site Assessment Report and AECOM's conclusions in respect of Site 22 be updated accordingly.

Should AECOM's concerns relate to vehicular access, planning application ref: 20/01938/OUT further demonstrates that a suitable vehicular and pedestrian access can be achieved from the site to Semington Road and this has been confirmed by Wiltshire Council highways. In respect of the other considerations planning application ref: 20/01938/OUT further demonstrates there are no known constraints that would preclude the

development of the site for residential purposes. As such, it requested that AECOM's assessment be updated to confirm Site 22 can be considered available, achievable, suitable and therefore deliverable within the Neighbourhood Plan period.

Moreover, delivery of housing at the Site at Semington Road, Melksham was the most supported option of those presented to the community during the '*Housing Sites Community Engagement*' (November-December 2017), 54% of respondents favoured development at this site (ref 3555). Indeed, the proposals presented during this consultation are similar to those sought through planning application ref: 20/01938/OUT. Accordingly, we request that the Parish/Town Council review their evidence base to ensure any allocation is supported by sufficient and proportionate evidence, whilst also contributing towards sustainable development in accordance with the requirements of Neighbourhood Plan basic conditions.

We have also reviewed the proposed Policies set out in the draft Neighbourhood Plan, and have set out our comments, and where necessary our suggested amendments, below:

- Draft Policy 2 relates to flood risk and states that all new development will be expected to include measures to reduce the rate of rainwater run-off in order to mitigate flood risk. Proposals will also need to address surface water run-off and re-use measures. The wording and aspirations of this policy is materially similar to Core Policy 67 (Flood Risk) of the Wiltshire Core Strategy. It is unclear why this policy is required given the existence of a comparable policy that required development to include measures to reduce the rate of rainwater run-off. Accordingly, we feel that draft Policy 2 should either be revised to reflect Core Policy 67 or should be removed from the Plan altogether.
- Draft Policy 5 as it is currently worded does not provide clear policy, rather it reads as guidance. A policy seeking early engagement with members of the local community would be advisable and welcomed, however we feel that it would be more practical if it were worded as follows: "Applications should demonstrate early, proactive and effective engagement with the community"
- Draft Policy 12 concerning Green Infrastructure is supported in so far as it requires developments to demonstrate how Green Infrastructure has been incorporated into the scheme. This Policy will help to achieve the overall vision and objectives set out in the Plan. For similar reasons, Draft Policy 13 relating to Biodiversity is also supported.
- Draft Policy 13, in so far as it relates to the planting of new trees in development proposals, is welcomed and is supported.
- Draft Policy 18 relates to ensuring high quality standards of design are met largely through provision of a design compliance statement. Although this policy is supported, we feel that it would be beneficial if this policy is amended to make clear that a Design and Access Statement (already a Wiltshire Validation requirement for outline/full proposals of 10 dwellings or more) is the most suitable document for this assessment to be undertaken.

## **Conclusions**

Having regard to the Neighbourhood Plan's supporting evidence base it is unclear how the planning approval to the north of the site represents a 'significant barrier' to the delivery of Site 22, considering that the northern

boundary of the site is formed by Berryfield Brook, Bowerhill Wastewater Treatment Works and a dense line of mature vegetation. The approval of 17/12514/REM is not a significant barrier to development; rather it demonstrates that development to the south of Melksham adjacent to Semington Road is an entirely sustainable location, which is suitable for growth.

These representations confirm that land at Semington Road (Site 22) is available, suitable, achievable and therefore deliverable in line with the definition at Annex 2 of the NPPF:

- Available – Hollins Strategic Land are keen to see the site brought forward for residential development as reflected by the current outline application for 144 dwellings 20/01938/OUT;
- Suitable – the site is located in a sustainable location for residential development, owing to its contiguous location to the Melksham built-up area. Contributions towards improvements to the existing highways infrastructure through 20/01938/OUT will further improve the accessibility of the site and its suitability for pedestrians and cyclists. The site is shielded from views in or out by dense mature vegetation on its boundaries and intervening development along Semington Road and Hampton Park West. The site has limited conservation and ecological value and its development will not cause adverse impacts on local heritage and ecology assets.
- Achievable – The site has very limited technical constraints and is located in an area, which is of strong interest to the market ensuring the Site would be delivered within five years.

We trust these representations will be taken into account in the preparation of the next stage of the Neighbourhood Plan.

Yours sincerely,



Jon Penrose

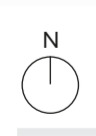
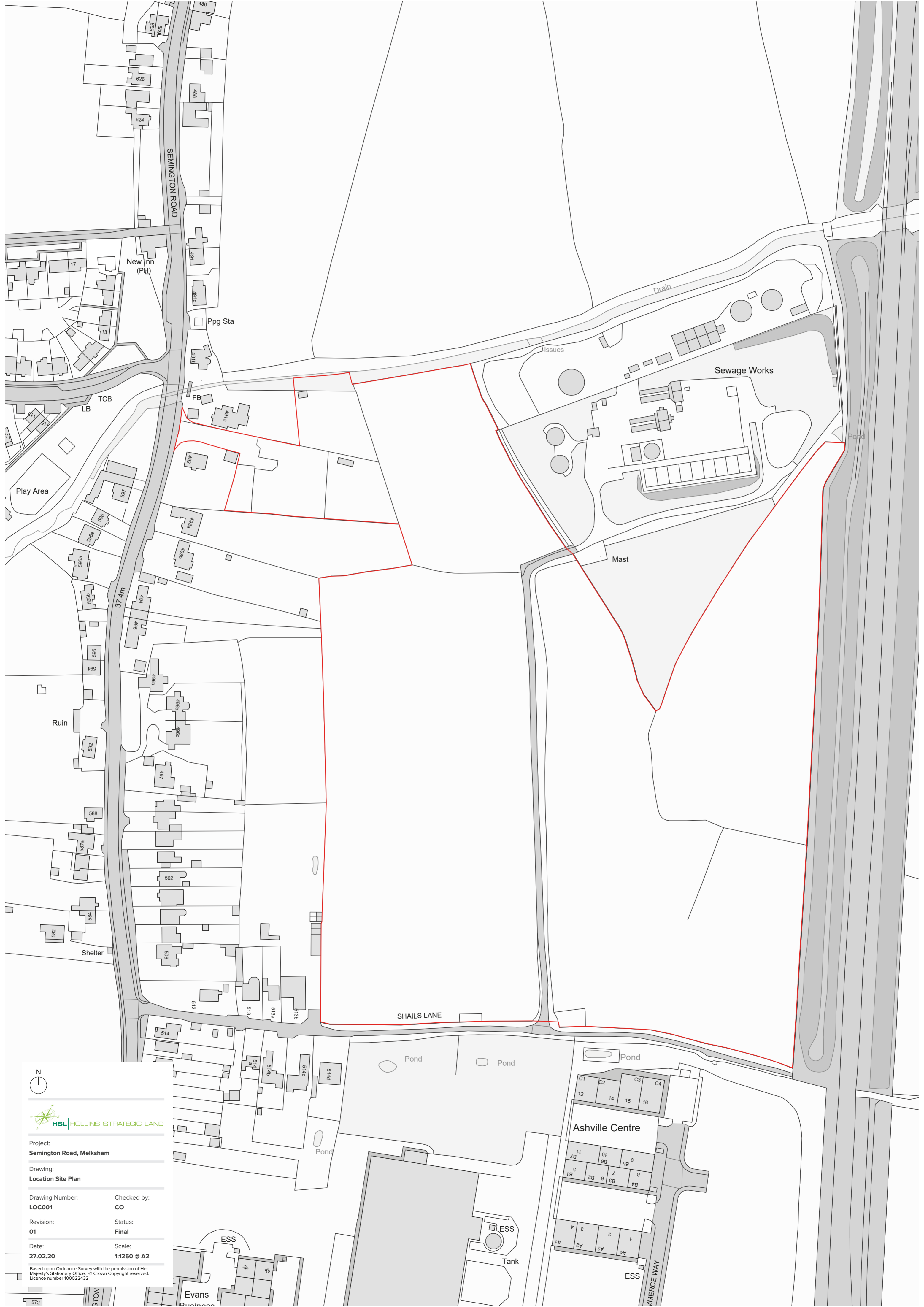
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**Appendix 1: Site Location Plan, land at Semington Road, Melksham**





Project:  
**Semington Road, Melksham**

Drawing:  
**Location Site Plan**

Drawing Number: **LOC001**      Checked by: **CO**

Revision: **01**      Status: **Final**

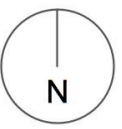
Date: **27.02.20**      Scale: **1:1250 @ A2**

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**Appendix 2: Indicative Layout Plan, land at Semington Road, Melksham**





Drawing Title: Sketch Layout (with Google Base)  
 Drawing Number: UG1851 - URB - UD - XX - XX - SK - (90) - 001  
 Project: Melksham, Wiltshire

Revision: H  
 Scale: 1:2,000 @ A3  
 Date: 04.06.2020

