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Dear Sir/Madam

**RE: DRAFT MELKSHAM NEIGHBOURHOOD PLAN – REGULATION 14 PRE-SUBMISSION CONSULTATION**

Thank you for the opportunity to respond to the draft Melksham Neighbourhood Plan consultation. This response has been prepared on behalf of Terra Strategic in relation to its land interests at land west of Semington Road, Melksham (site 5, AECOM Site Assessment report, September 2018). We are pleased to see that the neighbourhood plan is progressing as it is several years since the neighbourhood plan area was formally designated during which time we have discussed development proposals with both the Town and Parish Councils and the Melksham Neighbourhood Plan steering group.

Development plans are an integral part of the planning system and therefore it is unfortunate that in Wiltshire that the development plan is out-of-date. The Wiltshire Core Strategy was adopted in January 2015 with a 20-year plan period starting in 2006 and ending 2026. The plan was adopted with a largely retrospective plan period, already nine years progressed, and now in 2020 it has only six years left. The 2012 Regulations stipulate that local plans should be reviewed at least once every five years<sup>1</sup> and this legal requirement is reaffirmed in paragraph 33 of the National Planning Policy Framework (NPPF, February 2019). Wiltshire Council has not commenced its review of the Core Strategy and therefore it is out-of-date and in accordance with paragraph 11 of the NPPF a presumption in favour of sustainable development applies to the granting of planning permissions.

It is therefore disappointing that the Melksham Neighbourhood Plan has been prepared in the context of the out-of-date Wiltshire Core Strategy. Wiltshire Council should be planning positively for future growth through an up-to-date development plan rather than defending appeals challenging its housing land supply position. We note the suggestion that the plan may be an interim neighbourhood plan (neighbourhood plan 1) with a proposal to review the plan following the local plan review. This is not ideal situation, the neighbourhood plan should support and supplement an up-to-date local plan, and once it is 'made' (adopted) it should not need to be reviewed for several years. However, as Wiltshire Council's Core Strategy is out-of-date the neighbourhood plan has been put in this unfortunate position.

In this letter we will outline our comments to the draft neighbourhood plan, referring to page numbers and section references, policy extracts and make recommendations for amendments. We also provide comments on the evidence base to the neighbourhood plan, particularly the Site Assessment report (AECOM, September 2018).

**Foreword**

"When our work is completed the Neighbourhood Plan will have a place in planning law and should help to prevent unwelcome development while encouraging changes."

<sup>1</sup> (Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012

### TKP Comments

Whilst we appreciate that the Foreword is intended to be an informal introduction to the document, it is incorrect to say that the neighbourhood plan will have a place in planning law. The neighbourhood plan once it is 'made' (i.e. adopted) will form part of the development plan<sup>2</sup>. This is stated correctly in section 1.1 (page 6) and section 1.4 (page 8). Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires where in making any determination under the planning Acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material consideration indicates otherwise. Accordingly, the role of development plans is to guide and shape the future development of towns, villages and rural areas focussing on the achievement of sustainable development.

Also stating that the neighbourhood plan will "help to prevent unwelcome development" also sets a negative tone to the document. The NPPF and planning practice guidance (PPG) encourage neighbourhood plans to plan positively for future growth: "Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area."<sup>3</sup>

Indeed, text in section 1.1 of the draft neighbourhood plan reinforces this point by stating:

"It is important to note that the legislation does not allow Neighbourhood Plans to prevent development. A Neighbourhood Plan cannot say no to any more houses built when there is a national and regional shortage of housing. Instead, the Plan will help to shape new development, ensuring that local needs and aspirations are taken into account."

### TKP recommendations for amendments

For clarity, we suggest that this section of the Foreword is rewritten as follows:

"Once the neighbourhood plan has been endorsed by the local community at referendum, it will help guide the growth and future development of Melksham and form part of the Wiltshire Development Plan."

### 2.3 The Wider Context

*Fifth paragraph:*

The Core Strategy prescribes the number of homes to be built in the Melksham Community Area by 2026: 2,240 for Melksham (Town and Bowerhill) and 130 for the remainder of the Community Area. Development over the plan period to date has exceeded the housing numbers set out in the Core Strategy meaning that the housing requirement in Melksham (Town) and the remainder of the Community Area is now zero. There is therefore no specific requirement for this Plan to allocate sites for housing (see Wiltshire Council Housing Land Supply Statement dated April 2018).

### TKP Comments

Again, we reiterate our concerns about the Core Strategy being an out-of-date development plan which was adopted with a largely retrospective plan period and therefore does not plan for the future. Wiltshire Council has failed to progress a review of the Core Strategy despite its commitment to an early partial review being a determining factor in the Inspector's report recommending adoption of the Core Strategy (subject to main modifications). The suggestion that a new local plan could be in place by 2022 is unfortunately unrealistic given that Wiltshire Council has not commenced consultation on the local plan review yet.

The reference to the Core Strategy prescribing the number of homes to be built in the Melksham Community Area as 2,240 for Melksham (Town and Bowerhill) and 130 for the remainder of the Community Area is incorrect. These figures come from Table 1 (page 48) of the Core Strategy in which they are referred to as an "indicative requirement". It is not intended to be a ceiling or a cap on new housing development and many planning appeals<sup>4</sup> have confirmed that this is the case. The NPPF encourages local authorities to significantly boost the supply of homes through the development plan process and granting planning permissions.

<sup>2</sup> Planning and Compulsory Purchase Act 2004 Section 38 3c

<sup>3</sup> Planning Practice Guidance Paragraph: 001 Reference ID: 41-001-20190509

<sup>4</sup> Appeal Ref. 3132915, Land at Shurnhold, Melksham & Appeal Ref. 3150774, Land at Boreham Road, Warminster

In the absence of the Wiltshire Site Allocations making any housing allocations in Melksham, the neighbourhood plan should be taking the opportunity to plan positively for future growth of the town.

#### **TKP recommendations for amendments**

We therefore suggest that the text in section 2.3 is rewritten as follows:

“The Core Strategy outlines an indicative requirement for the number of homes to be built in the Melksham Community Area by 2026: 2,240 for Melksham (Town and Bowerhill) and 130 for the remainder of the Community Area.”

The following statement should be deleted:

“Development over the plan period to date has exceeded the housing numbers set out in the Core Strategy meaning that the housing requirement in Melksham (Town) and the remainder of the Community Area is now zero. There is therefore no specific requirement for this Plan to allocate sites for housing (see Wiltshire Council Housing Land Supply Statement dated April 2018).”

#### **2.4 The approach to the Neighbourhood Plan – Page 16**

*First paragraph:*

Although there is no requirement to allocate housing in this Neighbourhood Plan, there is ongoing development pressure in the area. The Steering Group therefore felt it important to consider and review potential development sites in the Plan area with a particular focus on what community benefit development could offer.

*Second Paragraph:*

Wiltshire Council is likely to allocate land for development in Melksham through the Local Plan Review process, and given that no final decision has yet been made on the precise scale or location of any allocation, it was agreed that this neighbourhood plan should not reach decisions on, or move to allocate, any of the 26 submitted edge of town sites.

#### **TKP Comments**

It is disappointing that the neighbourhood plan steering group has chosen not to allocate any housing sites in Melksham, aside from the site in Whitley which does not relate to the town. This is a missed opportunity. Government planning guidance encourages neighbourhood plans to be proactive and plan for growth; paragraph 13 of the NPPF states:

“Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies.”

To this end, the PGG states:

“Neighbourhood planning bodies are encouraged to plan to meet their housing requirement, and where possible to exceed it. A sustainable choice of sites to accommodate housing will provide flexibility if circumstances change, and allows plans to remain up to date over a longer time scale.”<sup>5</sup>

The PPG is clear that neighbourhood planning bodies can and should exceed their local housing requirement figure, albeit as we have explained the Wiltshire Core Strategy only outlines an “indicative requirement” for settlements across Wiltshire so it is not a cap or ceiling to development.

Paragraph 103 of the PPG continues:

“Where neighbourhood planning bodies intend to exceed their housing requirement figure, proactive engagement with their local planning authority can help to assess whether the scale of additional housing numbers is considered to be in general conformity with the strategic policies.”<sup>6</sup>

The neighbourhood plan steering group invited landowners and their agents to promote their sites for inclusion in the neighbourhood plan which included presentations to the steering group. Terra Strategic and Tetlow King Planning attended a presentation to the steering group in October 2017. It is therefore disappointing that despite undertaking the call for sites exercise and reviewing 32 sites

<sup>5</sup> PPG Paragraph: 103 Reference ID: 41-103-20190509

<sup>6</sup> Ibid

in the Site Assessment Report (AECOM, September 2018) that the steering group has chosen not to any allocate sites for housing and defer this until after the local plan review.

As the PPG explains, the neighbourhood plan does not have to wait for the local plan to make allocations it just needs to demonstrate that there is a need for the sites and that it is in accordance with the spatial strategy.

#### **TKP recommendations for amendments**

We strongly recommend that the progression of the neighbourhood plan is paused whilst further consideration is given to the allocation of housing sites around the edge of Melksham. There is a need to allocate housing sites at Melksham and the neighbourhood plan should seize this opportunity.

### **2.4 The approach to the Neighbourhood Plan – Page 16**

#### *Third Paragraph*

1. This Plan – it might be termed Neighbourhood Plan 1 – focuses on a number of key policy areas relevant to the Plan area as a whole which can also be used to inform the final details of any potential strategic site allocations for development made by Wiltshire Council in the Local Plan Review.
2. The Local Plan Review will draw from the contents of the Melksham Neighbourhood Plan when deciding on the scale and location of any potential strategic site allocations. Strategic allocations are, therefore, likely to be strengthened by the inclusion of more detailed, locally-generated principles and criteria than would otherwise have been the case.
3. Once the draft Local Plan Review is adopted, or has reached an appropriately advanced stage, this Neighbourhood Plan will be reviewed – it might be termed Neighbourhood Plan 2. At this point it will be possible to determine whether any of the other submitted potential sites on the edge of the main built area are even necessary and, if so, which could be allocated for development. This reviewed Neighbourhood Plan will also pick up on a number of other more detailed issues such as the potential designation of Local Green Spaces.

#### **TKP Comments**

The PPG makes it clear that a neighbourhood plan can be prepared in advance of a local plan:

“Neighbourhood plans, when brought into force, become part of the development plan for the neighbourhood area. They can be developed before or at the same time as the local planning authority is producing its local plan.”<sup>7</sup>

The PPG advises that this can be achieved by the local planning authority taking a proactive and positive approach, working collaboratively with a qualifying body. However, the lack of progress with the local plan review seems to have hindered the progress of the neighbourhood plan.

It is therefore disappointing that the neighbourhood plan is not seeking to strive ahead of the local plan and identify future areas of growth for the town. As the above quote from the PPG makes clear neighbourhood plans can be progressed at the same time or in advance of the local plan review.

Referring back to our earlier comments, neighbourhood plans can and should exceed the housing requirement; the PPG also states that neighbourhood planning bodies:

“...can use the authority’s local housing need as a starting point, taking into consideration relevant policies such as an existing or emerging spatial strategy, alongside the characteristics of the neighbourhood plan area.”<sup>8</sup>

Therefore, there does not seem any justification to prepare a ‘Neighbourhood Plan 1’ and a subsequent ‘Neighbourhood Plan 2’ after the local plan review.

The phrasing of the text at point 2 is confusing as whilst the PPG encourages collaborative working with the neighbourhood planning bodies and the local planning authority, the neighbourhood plan is only required to be in “general conformity with, and plan positively to support, the strategic policies of the development.” However, this text infers that the neighbourhood plan will be influencing the

<sup>7</sup> PPG Paragraph: 009 Reference ID: 41-009-20190509

<sup>8</sup> PPG Paragraph: 102 Reference ID: 41-102-20190509

local plan review, but the neighbourhood plan is the subservient plan to the local plan so the text is misleading.

We also challenge the text within point 3:

“At this point it will be possible to determine whether any of the other submitted potential sites on the edge of the main built area are even necessary and, if so, which could be allocated for development.”

This is a prejudicial statement, speculating whether any of the sites are “even necessary”. Clearly there will be a requirement to allocate more sites for housing in Melksham, whether the local plan allocates sites, or the neighbourhood plan does.

Again, we express our disappointment that despite the neighbourhood plan steering group encouraging landowners and agents to engage with it on the promotion of sites that no sites have been allocated for the town’s future growth.

The suggestion that the neighbourhood plan will be subject to an early review is unwarranted. The PPG notes that there is no requirement to review or update a neighbourhood plan but the policies may become out of date. It is only because the local plan is out of date that the proposal for an early review of the neighbourhood plan is being mooted but this approach is not justified. It is preferable that a more robust neighbourhood plan is prepared that plans for the future of Melksham.

#### **TKP recommendations for amendments**

We strongly recommend that the progression of the neighbourhood plan is paused whilst further consideration is given to the allocation of housing sites around the edge of Melksham. It is preferable that the steering group prepares one robust neighbourhood plan with a long lifespan rather than prepare an interim plan which is promptly reviewed. To be future proof the neighbourhood plan needs to proactively plan for Melksham’s growth.

#### **Draft Policy 6: Housing in Defined Settlements**

We will support proposals for small ‘windfall’ housing development within the settlements of the Plan area, where they conform with the policies of the Development Plan and where they:

- i. accord with the limits of development provisions of Wiltshire Core Strategy Core Policy 2;
- ii. include a suitable mix of house types, sizes and tenures informed by and addressing the current and demonstrable needs for the area within which the site is located in accordance with Wiltshire Core Strategy Core Policy 45 (Meeting Wiltshire’s Housing Needs), and
- iii. have regard to the character and quality of the surrounding area.

In accordance with Wiltshire Core Strategy Core Policy 2, development will not be permitted outside the settlement boundaries other than in circumstances as permitted by other policies within the Core Strategy. At the small villages, development will be limited to infill within the existing built area, or where appropriate outside the built area, but well connected to it, as a rural exception site to provide affordable housing to meet identified local needs.

#### **TKP Comments**

There is no need for draft policy 6. Core Strategy Core Policy 2 states:

“Within the limits of development, as defined on the policies map, there is a presumption in favour of sustainable development at the Principal Settlements, Market Towns, Local Service Centres and Large Villages.”

It is therefore an unnecessary policy which duplicates Core Policy 2.

We are concerned that draft policy 6, together with the lack of housing allocations, portrays the message that the neighbourhood planning steering group is not supportive of new development proposals and actively encouraging Melksham to grow and thrive.

Again, in response to the reason for the policy (page 41) we reiterate our comments in relation to “indicative requirement” for Melksham and the community area being 2,370 homes. This figure is not a cap or ceiling to development and should be exceeded especially as it is only planning until 2026.

#### **TKP recommendations for amendments**

We recommend that the policy is deleted as it is unnecessary duplication of Core Strategy Core Policy 2.

**Draft Policy 7: Allocation of Land at Middle Farm, Corsham Road, Whitley**

Land at Middle Farm, Corsham Road, Whitley is allocated for development of approximately 18 (eighteen) dwellings. Proposals will be expected to conform with the criteria (below) and relevant policies within the Development Plan.

**TKP Comments**

The Core Strategy classifies Whitley, along with the adjacent settlement of Shaw, as a large village. It is fifth in the settlement hierarchy (Core Policy 1) which defines Large Villages as settlements with a limited range of employment, services and facilities. It is therefore not a sustainable location for development compared to Melksham which is one of Wiltshire’s largest market towns where there are employment opportunities, a broad range of shops, facilities and services and public transport including a main line railway station. Accordingly, sites should be allocated in Melksham in advance of rural areas such as Whitley.

Moreover, the Site Assessment report (AECOM, 2018), the evidence base to the neighbourhood plan, did not include this site (site 12: Middle Farm, Corsham Road) in the shortlist of 10 sites suitable for development. It was identified as one of 12 other sites as having potential on the basis of there being “a number of constraints which would need to be overcome to enable development, including potential impacts on the road network.” It is therefore odd that the steering group has ignored the findings of its own evidence base and allocated this site for housing.

The site would be more appropriate as a rural exception site where it could bring forward much needed affordable homes to the local community. Core Strategy Core Policy 44 encourages the provision of rural exception sites in Local Service Centres, Large and Small Villages. However, the supporting text to the policy only suggests that the site would only bring forward five homes, which is less than 30% of the 18 dwelling capacity figure and is therefore not policy compliant nor will it address the unmet housing needs of the local community. The NPPF encourages the provision of rural exception sites and entry-level exception sites to address housing needs. Further the PPG suggests that neighbourhood plans are a useful tool to ensure the delivery of affordable homes<sup>9</sup>.

It is therefore a missed opportunity that no sites have been identified in the neighbourhood plan to address affordable housing needs.

In response to the reason for the policy (page 43) we reiterate our comments that: “Whilst there is no remaining housing requirement for the Melksham Area Neighbourhood Plan in the Plan period to 2026” is incorrect. The 2,370 homes is an indicative requirement and not a cap or ceiling to development. Moreover, there are only six years left in the plan period and Core Strategy review is long overdue.

**TKP recommendations for amendments**

Whilst we question the rationale and justification of this allocation in terms of its sustainability and evidence base, if the neighbourhood plan steering group should pursue this allocation then we strongly recommend that the site be allocated as a rural exception site.

**Draft Policy 8: Infrastructure Phasing and Priorities**

To ensure the sustainability of housing development, proposals must consider, assess and address their necessary infrastructure requirements and plan any related programmes of work in parallel with the housing to ensure that infrastructure keeps pace with the needs of the community.

A Joint Plan Area Statement of Infrastructure Priorities for infrastructure needs and improvements will be reviewed annually and agreed jointly between the Town and Parish Councils. The broad infrastructure categories are:

- Social infrastructure: e.g. Community Facilities
- Physical infrastructure: e.g. sustainable transport link and town centre regeneration
- Green infrastructure: e.g. continued investment in the Riverside Millennium Walk / Shurnhold Fields etc.
- Other project areas: e.g. community energy

<sup>9</sup> Paragraph: 100 Reference ID: 41-100-20190509 & Paragraph: 005 Reference ID: 41-005-20190509

### TKP Comments

We appreciate that the neighbourhood plan steering group is interested in what community benefits a new housing development can bring and ensure that there is sufficient infrastructure to support developments. However, without new developments, the town and wide community area of Melksham will not benefit from infrastructure improvements as it is reliant on new developments to fund infrastructure. We therefore repeat our previous comments that the neighbourhood plan needs to be proactive and encourage new development and allocate housing sites.

We note the comment in the reason for the policy section (page 45):

“The issues raised by the community echo the elements considered important for Melksham in the Wiltshire Core Strategy (paragraph 5.83) which states that, ‘residential growth in Melksham should help address the shortfall in affordable housing and contribute towards delivering improved infrastructure’.”

Again, we express our disappointment that no sites have been allocated specifically to address affordable housing needs. As we suggested in our comments to draft policy 7, rural exceptions sites should be identified to directly respond to affordable housing needs and the site at Whitley would be an ideal candidate. Neighbourhood plans are ideally placed to allocate rural exception sites to meet local housing needs.

Indeed, Terra Strategic previously promoted a 100% affordable housing scheme at land west of Semington Road which would have addressed a range of housing needs including affordable rent and affordable home ownership. It was disappointing that despite the number of community benefits the scheme would bring, most notably affordable housing, it did not receive the support of the Parish Council, whom are representative on the neighbourhood plan steering group.

We also note that page 45 refers to the local planning authority being required to produce a Regulation 123. This requirement was deleted when the CIL Regulations was amended in 2019.<sup>10</sup> Local authorities are now required to produce annual infrastructure funding statements which set out how much money has been raised through developer contributions (both CIL and S106 obligations) and how it has been spent. All authorities must produce their first statement by 31 December 2020.

Notwithstanding these changes to the CIL Regulations it is welcome that the Town and Parish Councils are intending to prepare a joint plan area statement of Infrastructure Priorities which will be reviewed annually. Whilst we welcome this proactive approach, we would ask the Town and Parish Councils to be mindful of deliverability as disproportionate developer contributions can lead to unviable developments. It is in the interests of all that housing developments bring forward community benefits but infrastructure requirements need to be viability tested as is the case for the CIL charge for each local planning authority area.

### TKP recommendations for amendments

We are satisfied with the principle of this policy but wish you to consider the comments we raise in further revisions to the policy. The text in the reason for the policy section needs to be updated regarding the CIL 123 list as explained above.

### Melksham Canal Link Project – Page 60 & 87

A key priority for the Plan area G.I is the Melksham Link Project. The Wiltshire Core Strategy safeguards the route of the Melksham Link Canal in Core Policy 16.

#### *Draft Priority Statement 6: Wilts & Berks canal restoration*

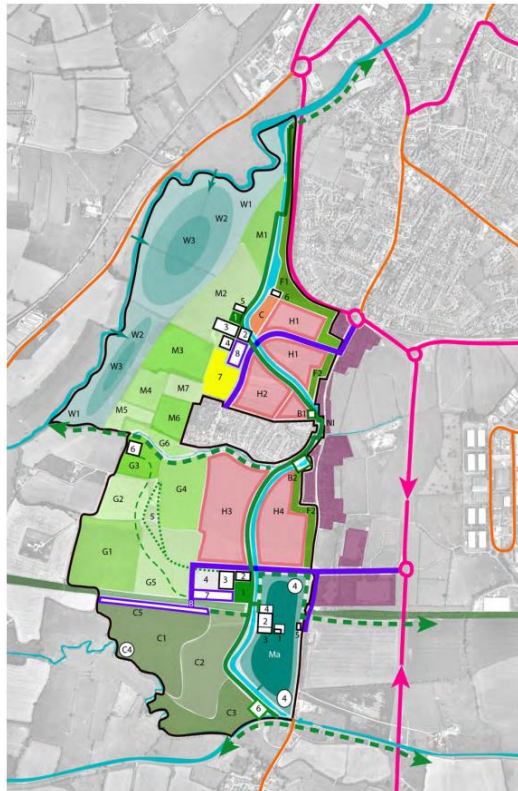
The Town and Parish Councils continue to support the safeguarding of the future route of the canal, as this restoration project could provide significant economic, environmental and social benefits to Melksham.

### TKP Comments

As noted in the text a planning application for the Melksham link was submitted to Wiltshire Council in 2012 and is still pending determination. The concept masterplan relies on residential development

<sup>10</sup> Community Infrastructure Levy (Amendment) (England) (No. 2) Regulations 2019

to facilitate and fund the development of the canal link and identifies a number of residential parcels along Semington Road, includes our client's land at Townsend Farm, see extract below.



We welcome that there is still a commitment to deliver the Melksham canal link project as it will bring substantial recreational, economic and environmental benefits to the community. However, without the funding generated from new housing developments it is clear the canal link vision cannot be achieved.

It is disappointing that the neighbourhood plan steering group has not taken the opportunity to proactively plan for Melksham's future. Melksham is a thriving market town, a sustainable location that should be allowed to grow to bolster further infrastructure investment. We appreciate that, in part, the neighbourhood plan's progression has been held back by delays to the local plan review. We think it is important that sites on the edge of Melksham are considered for housing allocations and below we highlight the merits of the site location and provide comments on the site assessment report.

### Land west of Semington Road (Site 5)

Our client's land is situated to the south-west of Melksham, immediately adjacent to the existing settlement boundary. It therefore forms a logical extension to the south of Melksham. The site is sustainably located within walking distance of services and facilities in Melksham town centre. The site itself is flat and constraint free. It is a self-contained site with well-defined defensible boundaries, which are screened by mature vegetation. The site is situated within Flood Zone 1.

The Site Assessment report (AECOM, September 2018) acknowledges that site 5 is relatively unconstrained and well screened from all boundaries. However, despite the site's proximity to the town boundary, the site is unfairly scored as being potentially suitable (amber category) for allocation in the neighbourhood plan. Rather than taking a neutral perspective on all sites, the assessment for site 5 seems unfairly prejudiced by the 2017 application for 160 residential dwellings which was refused planning permission. Wiltshire Council was opposed to the scheme predominantly on the basis of principle of development on the basis of the site's location beyond the defined settlement limits. All of the sites assessed in the Site Assessment report are beyond the defined settlement limits; but only a few, such as site 5, are immediately adjacent to the settlement boundaries.



We do question the soundness of the methodology of the site assessment report as site 5 should have made the shortlist of sites suitable for development. Its location is clearly preferable as a logical extension to Melksham town boundary. Wiltshire Council has granted planning permission for a number of developments beyond the settlement boundary, the most notable example being land east of Semington (reference 16/00497/OUT) which is removed from Melksham and more closely related to Berryfields.

Furthermore, the ecology comments cited within the key constraints section (4.5.2) of the site analysis are not founded on any evidence to demonstrate the assertions of the presence of bats and Great Crested Newts. The ecology survey which was submitted with the planning application confirmed that the nearest pond (approx. 68m north-west of the site) was found to be levelled, dry and overgrown with vegetation and therefore unsuitable for amphibians. Also, the ecology survey concluded that none of the trees on site had any bat roosting features present.

Finally, in the recommendation (4.5.3) it states “whilst the site has not recently been surveyed, the site is likely to comprise land classified as the best and most versatile agricultural land.” It is noted that site 12: Middle Farm, Corsham that has been allocated for housing is currently in agricultural use, as are many of the other sites which are reviewed in the site assessment, however, this isn’t mentioned in the recommendations to site 12, nor has it hindered its allocation. The document is therefore inconsistent and partial.

We have previously submitted planning applications for the site at Land West of Semington Road. The most recent scheme being a 100% affordable housing scheme which would have addressed a range of local housing needs including affordable rent and affordable home ownership products. The site is located in a suitable location and meets the NPPF deliverable test: available, suitable and achievable.

In summary, whilst we welcome the production of the neighbourhood plan and are pleased to see it progress to draft consultation stage, we are extremely concerned that the neighbourhood plan misses the opportunity to proactively plan for the future growth of Melksham. Rather than preparing what is essentially an interim neighbourhood plan, waiting for the Wiltshire Local Plan review, the neighbourhood plan steering group should be taking the lead in addressing local housing need for Melksham, in particular affordable housing need. We therefore urge the neighbourhood plan steering group to pause the preparation of the plan whilst further consideration is given to the allocation of housing sites around the edge of Melksham. It is preferable that the steering group prepares one robust neighbourhood plan with a long lifespan rather than prepare an interim plan which is promptly reviewed. To be future proof the neighbourhood plan needs to proactively plan for Melksham’s growth and our client’s site, land west of Semington Road is ideally located to deliver much need housing.

In light of the ongoing promotion of the site for residential development our client is keen to engage in the process on further stages of the neighbourhood plan. We would therefore like to be consulted on further stages of the neighbourhood plan and other related publications and would welcome the opportunity to meet with the steering group to discuss the site.

Yours sincerely



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