
Draft Joint Melksham Neighbourhood Plan (2020 – 2026)

Prepared by Savills
on behalf of Hallam Land Management

1. Introduction

This Representation is made in response to the consultation on the draft Joint Melksham Neighbourhood Plan (2020-2026). The representation is submitted by Savills on behalf of Hallam Land Management (HLM) who has an interest in land to the south of Western Way, Melksham. A copy of the Site Location Plan is attached at **Appendix A**.

By way of context, HLM controls an area of land comprising approximately 10.5 hectares adjacent to the southern edge of Melksham. Through the 2017 Strategic Housing and Employment Land Availability Assessment (SHELAA), the site has been identified as suitable, available, achievable, deliverable and developable in the short-term (Reference: 1025).

The document comments on the strategic objectives set out within the draft plan, particularly the scale of future development proposed and the need to increase housing delivery at Melksham to respond to a Wiltshire-wide undersupply of housing. The representations also comment upon some draft policies and outlines the significant opportunity presented by the Land South of Western Way to accommodate future growth.

2. Scale of Development

It is clear that the draft Neighbourhood Plan (from hereon in referred to as 'the draft Plan'), whilst outlining policies which relate to housing, does not propose a significant or meaningful scale of development for the plan period, with only a single draft allocation for 18 dwellings at Whitley (Draft Policy 7: Allocation of Land at Middle Farm, Corsham Road, Whitley).

There are a number of references within the draft Plan to the delivery of housing through recent commitments, and Figure 4 on page 15 outlines the major planning permissions granted during the current Wiltshire Core Strategy period.

In explaining the position regarding site allocations, the draft Plan states:

"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).

Then, on page 16 of the draft Plan, the position on housing allocations is further explained, as follows:

"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. Landowners submitted potential land for development through a local call for sites and the Wiltshire Council Strategic Housing Land Assessment process; more than 60 sites were assessed in total. 26 of these sites could be considered to be potential extensions to the current built area of Melksham (both Town and Without). All have been independently assessed, some emerging as suitable, some as potentially suitable, some as unsuitable (see the Housing Evidence Base Report in the Evidence Folder).

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. Sites in the rural areas of Melksham Without Parish were further assessed in relation to possible community benefit as a result of allocation". (underlining our emphasis).

Whilst it is acknowledged that development over the plan period has exceeded the Core Strategy housing requirement for Melksham, the Core Strategy is explicit that this is not a 'cap' on development. The Core Strategy and national policy and guidance, also encourages Neighbourhood Plans to take opportunities to plan proactively for future growth.

It is important to note that Wiltshire Council have issued an update on the Wiltshire wide housing land supply position in June 2020, confirming in a Briefing Note, entitled 'Briefing Note on Housing Land Supply No. 20-20', that the Council can only demonstrate a 4.62 years supply of housing land. This update from Wiltshire Council was a result of the appeal decision for Land at Purton Road, Swindon (Ref: APP/Y3940/W/18/3202551) which confirmed that it was agreed between Wiltshire Council and the Appellant that the five year housing land supply position is between 4.42 – 4.62 years.

Given the lack of a sufficient five year housing land supply across Wiltshire as a whole, and thus a need for additional sites to come forward for development, there is an opportunity for the Melksham Neighbourhood Plan to review sustainable sites to accommodate future growth. We note that a number of sites have been assessed as part of the background work supporting the draft Plan and it would be possible for the Steering Group to review these sites again and allocate additional land in order to address the wider housing shortfall.

The following section outlines the merits of the land south of Western Way, and confirms why this site in particular provides a significant opportunity for sustainable development, and should therefore be considered for allocation in the Neighbourhood Plan.

Given the housing land supply position in Wiltshire, which is only likely to be exacerbated through 2020 into 2021 by the impacts of Covid 19, allocating additional sites now would result in the delivery of affordable housing in the short term, a significant benefit for the area.

Indeed, this is a notion which appears to be supported by the community through consultation carried out on the draft Plan, clear from the summary outlined on page 43 which states that *“whilst there is no remaining housing requirement for the Melksham Area Neighbourhood Plan in the Plan period to 2026, consultation revealed that almost half of those who responded to the consultation (47%) supported more housing growth if the quantity, location and community benefits could be locally defined through the Neighbourhood Plan, with a further 34% answering “it depends”.*

Overall, we consider that there is a good opportunity for the draft Plan to review sites now given the current context of a lack of housing land supply in Wiltshire generally, and that the land south of Western Way represents, in our view, the most logical site on the edge of the town to accommodate future growth should the Steering Group undertake a further site review exercise beyond the Pre-Submission stage.

3. Draft Policies

Draft Policy 8

We agree with the objectives set out in draft Policy 8 and the emphasis that required infrastructure should be delivered alongside new housing.

The Land South of Western Way is capable of accommodating not only residential dwellings to meet the housing need, but also infrastructure including items listed as priorities in draft Policy 8 such as community and green infrastructure.

Draft Policy 14

This draft policy seeks to protect open spaces around the town which we support in principle, however we object to the Land South of Western Way being identified as part of this policy, and on Figure 13, as an ‘amenity green space’.

The land is private with no public access, and is farmed with crops, so does not comprise an area used by local residents. Furthermore, the land is not designated for open space or amenity purposes in Wiltshire’s adopted Development Plan.

It is noted that the land is identified in the Green Infrastructure Evidence Base Report (March 2020) as an ‘amenity green space’, and within the document it is stated that “*Map 1 and Table 1 give further detail on key open spaces in the Neighbourhood Area. A network of Amenity Green Space has been identified by both Wiltshire Council and the Neighbourhood Plan Steering Group (identified in pale pink on Map 1). This network consists of a variety of green areas including green verges and more extensive open areas. The more extensive or notable areas have been labelled on Map 1, and where appropriate, community comments are included in Table 1*”.

However, there is no explanation within this document for why the land has been identified as an amenity green space. Map 1 shows each of the identified green spaces in and around Melksham, with Table 1 providing explanatory text. However, the land south of Western Way is not included in Table 1 and is therefore highlighted on the map with no explanation or evidence for the proposed amenity green space designation.

There is nothing within the Landscape Report or wider evidence base to support the identification. The only way it could become part of Melksham’s Green Infrastructure is by its inclusion as a development area in which case new pedestrian routes would be created and a significant proportion of the site would become managed as important green space.

In addition, half of the draft ‘designation’ is also now permitted for development, and thus an ‘amenity green space’ identification cannot supersede a planning permission.

It is therefore unclear why the land has been designated in this way, and it is recommended that this ‘amenity green space’ designation across the site is removed from the supporting evidence base and main draft Plan.

4. Land South of Western Way, Melksham

HLM controls an area of land comprising approximately 10.5 hectares adjacent to the southern edge of Melksham and immediately north of Bowerhill. A copy of the Site Location Plan is attached.

The land was put forward to the 2017 SHELAA as a suitable and deliverable location for residential development. The site was identified by WC as 'suitable' with 'no suitability constraints'. The Council's assessment also added that it was achievable, available, deliverable, and developable in the short-term (Reference: 1025).

The site has previously been considered for allocation by WC as part of the draft Wiltshire Housing Site Allocations Plan. The site formed part of a selection of sites which were 'Refined Options Carried Forward' in the 2015 Assessment. Within the 'Refined Option 2' Scenario, the site represents the only remaining parcel which has not subsequently secured consent for development. Within the 'Refined Option 1' Scenario, the largest unconstrained parcel has already secured planning consent, and the remainder of the parcels form part of the safeguarded Melksham Canal, which alongside the necessary earthworks, would leave only a small residual area for development. Thus, the site represents the only remaining option from WC's previous site selection exercise. It therefore has a strong planning pedigree having previously been tested through the site allocations process.

The site is bordered by Western Way (A365) to the north, beyond which is housing. Adjacent to the south is the employment area of Bowerhill – which is a designated Principal Employment Area. To the east of the site, there is a planning consent for up to 235 dwellings, primary school with early years nursery and open space provision (16/01123/OUT), which was consented in March 2017, and a subsequent reserved matter application approved in October 2018 for 213 dwellings. This development, Pathfinder Place, is under construction and the site is expected to be complete by 2025. To the west of the site is the A350 and the A350/A365 roundabout. New residential development is also under construction on land to the west; Land East of Semington Road, Melksham (16/00497/OUT) was consented in May 2017 for up to 150 dwellings, and a subsequent reserved matter application approved in May 2018 for 150 units. The site is due for completion in 2022/23.

As a result, the land controlled by HLM will ultimately therefore be surrounded on all four sides by built development. Furthermore, it will be extremely well placed to access the new primary school being delivered as part of the Pathfinder Place development and the significant employment opportunities to the south at Bowerhill.

Over the past 12 months HLM have undertaken transport modelling in order to achieve access into the site off the A350. The attached access drawing at **Appendix B** illustrates a proposed access strategy for the site, and has been considered acceptable by Wiltshire Council's Highways Officer. The agreed access strategy therefore demonstrates that the site is deliverable in highway terms.

In summary, the land is unconstrained, available for development and represents a highly sustainable location for housing. It is accessible, well related to the built-up area, there are no environmental constraints to development, and highways access can be achieved. The site is therefore very well placed to contribute towards addressing the housing need. If the land were to be allocated for development it could attribute to housing supply within the Neighbourhood Plan period to 2026.

5. Site Assessments

We have reviewed the sites assessed within the Melksham Neighbourhood Plan Site Assessment Report (September 2018), published alongside this consultation.

We have already outlined the merits of the land South of Western Way, however we have also reviewed the other potential site options and of are the view that none of the other sites assessed are either suitable or capable of accommodating residential development of a reasonable scale.

The Land South of Western Way represents the only remaining parcel, assessed as part of the Wiltshire Housing Site Allocations Plan, which has not subsequently secured consent for development. Thus, the site represents the only remaining option from the Council's previous site selection exercise, having been tested through the site allocations process.

Therefore, the majority of the sites outlined in Figure 1.2 of the Site Assessment Report have already been previously discounted for various reasons as part of the Wiltshire Site Allocation Plan process.

Whilst we haven't interrogated each site in detail it is clear that the following sites confirmed in the Site Assessment Report as suitable to consider are actually constrained and were discounted as part of the Site Allocations process, as follows:

- Sites 1 – 4, 10, 30, 32 – previously excluded due to 'strategic criteria / assessment'. These sites are all located within flood zone 3 and should be discounted.
- Sites 11, 26 and 31 – whilst not located within flood zone 3, these sites are located adjacent to flood zone 3 and are highly constrained. Indeed, site 31 was previously discounted by the Site Allocations process following further assessment.
- 23, 24 and 25 – previously excluded due to 'strategic criteria / assessment'. These sites would result in a significant protrusion into the countryside as a result of an extension to Bowerhill.
- Site 5 and 27 – whilst these sites were included in the refined options carried forward for further assessment as part of the Site Allocations process, it is clear that the land comprising sites 5 and 27 is constrained as demonstrated by the refused planning application on 15 May 2017 (ref: 17/01095/OUT). The decision notice for this refused application confirms that the land comprises Grade II agricultural land (best and most versatile), was deemed to be sensitive open countryside and has significant highways constraints.

In addition to the above, it is clear that Site 22 is the subject of a pending planning application (ref: 20/01938/OUT) for the development of 155 residential dwellings on Land at Semington Road. However, this land, previously assessed as part of the Site Allocations process, was discounted due to strategic criteria / assessment. The speculative outline application seeks to resolve some of the key technical constraints but it is clear that the application still has outstanding technical constraints relating to drainage and ecology. In addition, the application has received objections from the Council's drainage officer, Melksham Town Council and Melksham Without Parish Council.

It is important to note that the objection from Melksham Without Parish Council understandably highlights concerns over the lack of school provision within safe walking distance of the site. The site is a significant distance from the nearest primary school, and even once the Pathfinder Way Primary School is delivered this would not be a short walk from the site and would result in children having to cross the busy A350.

The Land South of Western Way however, assessed as 'Site 14' in the Site Assessment Report, is confirmed as suitable for development, and the report recommends the site be taken forward for the purposes of the Neighbourhood Plan. The constraints noted within the site assessment are:

“Development of the site would extend the southern boundary of the built-up area of Melksham across Western Way. The site contributes to a green gap between Melksham and the village of Bowerhill. Whilst the approval of planning applications for up to 235 dwellings to the east of the site (16/01123/OUT), and 150 dwellings on land to the west of the site (16/00497/OUT) will remove land contributing to this green gap, and significantly changing the townscape and villagescape development at this location will further erode the separation of the settlements.

Significant residential development to the east and west of the site is likely to increase traffic along the Western Way, a key route through the Neighbourhood Plan area. This has the potential to impact on air quality. Additional development at this location is likely to increase these effects. There are also potential safety concerns as children will need to cross this road to reach the Aloeric Primary School to the north of the site.

From an ecological perspective, there is a row of semi-mature trees along the southern site boundary which might be suitable for protected species. This corridor connects to adjacent tree corridors and hedgerows, including a row of trees extending north/south through the centre of the site”.

Of the constraints highlighted above, whilst development of the site would result in development south Western Way, this wouldn't result in an intrusive extension into an important green gap between Melksham and Bowerhill as suggested. Residential development has already been consented to the east and west of the site, including the Pathfinder Way site to the east which will be delivering a new school. These permissions have therefore already established built development south of Western Way, and the site represents the last remaining parcel of land within this corridor. In addition, the site is not an important green gap and is not subject to any specific policy designation which restricts development. The landscape south of Western Way has therefore already changed and instead presents an opportunity to provide additional residential dwellings in a sustainable location surrounded by a new school, services, facilities and employment opportunities.

With reference to the concerns highlighted by Melksham Town Council and Melksham Without Parish Council to the Semington Road outline planning application, the land south of Western Way would provide future residents with easy and safe access to the adjacent Pathfinder Way school which will be located immediately east of the site.

6. Summary and Conclusions

Whilst it is acknowledged that development over the plan period has exceeded the Core Strategy housing requirement for Melksham, given the lack of a sufficient five year housing land supply across Wiltshire as a whole, this provides an opportunity for the Melksham Neighbourhood Plan to review sustainable sites to accommodate future growth.

Indeed, the housing land supply position in Wiltshire is only likely to be exacerbated through 2020 into 2021 by the impacts of Covid 19, allocating additional sites now would result in the delivery of affordable housing in the short term, a significant benefit for the area.

The Land South of Western Way, Melksham is suitably located to the south of the town, and will soon be surrounded by built development on all four sides. The site has already been assessed as suitable by Wiltshire Council as part of the recent Site Allocations Plan process. The land is free from any significant constraints and is capable of accommodating approximately 250 residential dwellings. If the land were to be allocated for development it could attribute to housing supply within the Neighbourhood Plan period to 2026.

Should further information on the site be required please contact Nick Matthews (nmatthews@savills.com) or Dan Yeates (dyeates@savills.com).

Appendix A: Site Location Plan

NOTES

This drawing is the property of FPCR Environmental and Design Ltd and is based on the conditions of use and responsibility, consent for approval for any construction project, other works or any other activities within the site of FPCR Environmental and Design Ltd. Comments should be made in writing to the project manager. Map data © 2016 Google



KEY

— Site Boundary



Rev	Date	Description	By	Appr
1	01/02/2017	Site boundary	JMG	JMG
2	20/01/2017	Application boundary amendment	JMG	JMG
3	20/11/2016	Final issue	JMG	JMG

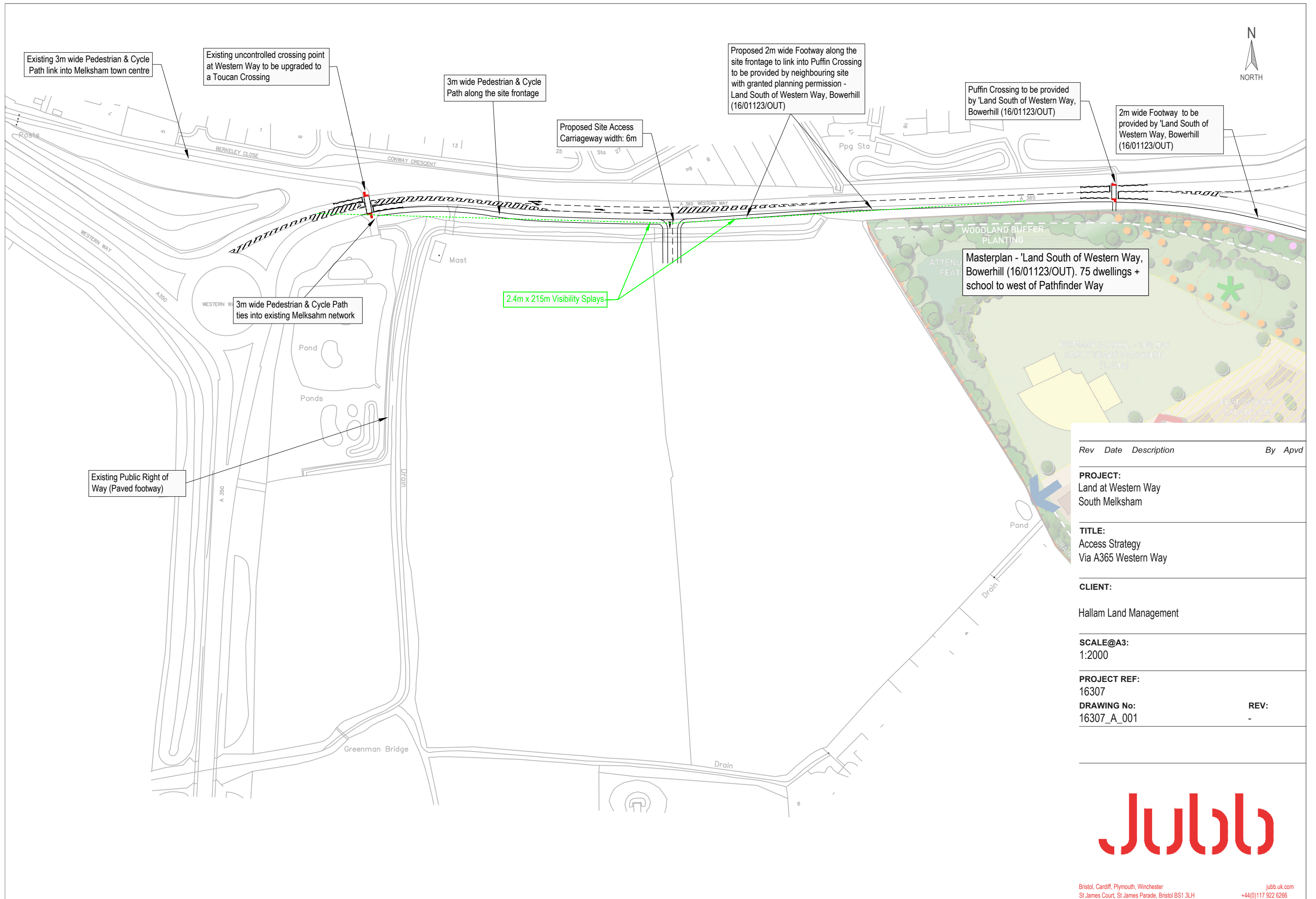


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client
Hallam Land Management Ltd
 project
**Land off Western Way,
 Melksham**
 drawing title
SITE LOCATION PLAN

scale
 1:1250 @ A1
 drawing number
76111-L-01
 date
 November 2016
 revision
B

Appendix B: Access Drawing



Existing 3m wide Pedestrian & Cycle Path link into Melksham town centre

Existing uncontrolled crossing point at Western Way to be upgraded to a Toucan Crossing

3m wide Pedestrian & Cycle Path along the site frontage

Proposed Site Access Carriageway width: 6m

Proposed 2m wide Footway along the site frontage to link into Puffin Crossing to be provided by neighbouring site with granted planning permission - Land South of Western Way, Bowerhill (16/01123/OUT)

Puffin Crossing to be provided by 'Land South of Western Way, Bowerhill (16/01123/OUT)

2m wide Footway to be provided by 'Land South of Western Way, Bowerhill (16/01123/OUT)

3m wide Pedestrian & Cycle Path ties into existing Melksahm network

2.4m x 215m Visibility Splays

Masterplan - 'Land South of Western Way, Bowerhill (16/01123/OUT). 75 dwellings + school to west of Pathfinder Way

Existing Public Right of Way (Paved footway)

Rev	Date	Description	By	Apvd
PROJECT: Land at Western Way South Melksham				
TITLE: Access Strategy Via A365 Western Way				
CLIENT: Hallam Land Management				
SCALE@A3: 1:2000				
PROJECT REF: 16307				
DRAWING No: 16307_A_001				REV: -

