

Spatial Planning
Economic Development and Planning
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Melksham Town Council and Melksham Without Parish Council
For attention: Teresa Strange – MWPC clerk

Via: e-mail
7th August 2020

Dear Teresa,

**Consultation on the draft Joint Melksham Neighbourhood Plan 2020 – 2026
(Regulation 14) - Wiltshire Council consultation response**

1. Thank you for providing Wiltshire Council with the opportunity to comment on the draft Joint Melksham Neighbourhood Plan - Regulation 14 Consultation Draft (June 2020), referred to hereafter as the 'draft JMNP'. We welcome the publication of this draft of the neighbourhood plan and the significant progress this represents.
2. This consultation gives an opportunity for the Council to comment at this first formal consultation stage of the draft JMNP's preparation. Our focus at this stage is to ensure that the draft plan generally conforms to strategic policies contained in the development plan, which includes the Wiltshire Core Strategy (WCS), Chippenham Site Allocations Plan (CSAP) and Wiltshire Housing Site Allocations Plan (WHSAP), and that the proposed policies will be effective in achieving their stated objectives through the determination of individual planning applications.
3. At this stage it is also worth reviewing the Basic Conditions, which include making sure the draft JMNP aligns with national policies and advice contained in the National Planning Policy Framework (NPPF) and in general conformity with the strategic policies contained in the development plan, but also whether the draft plan contributes to sustainable development and conforms to any relevant EU legislation.
4. The comments that follow identify areas that should be addressed when considering appropriate changes to be made to the draft JMNP following the consultation period. These comments also take into consideration the views of specialist officers in the Council. We would welcome the opportunity to discuss the contents of this letter when you are in a position to do so.

Draft JMNP Plan Period

5. It is noted that the intention is to align the draft JMNP plan period with the adopted Wiltshire Core Strategy (WCS) plan period to 2026, with a review being undertaken as the Local Plan Review proposals emerge. On reflection, we consider that as 2026 is now only a relatively short time away, neighbourhood plans are supposed to set out a positive vision for how they want their community to develop over the next 10, 15, 20 years, and the policies of the neighbourhood plan are capable of enduring longer, it would seem sensible to extend the plan period to 2030 and that is our recommendation. Therefore, the Plan period should be 2020-2030. An early review of the neighbourhood plan can still take place as intended.

Habitats Regulations Assessment (HRA)

6. Likely effects of proposed draft JMNP policies on European Sites were considered both individually and in combination with other plans and projects. It has been confirmed by ecologists at Wiltshire Council that the draft JMNP will not trigger the requirement for appropriate assessment under The Conservation of Habitats and Species Regulations 2017 (amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019).

Strategic Environmental Assessment (SEA)

7. The SEA screening determination (July 2020) of Wiltshire Council concluded that the draft JMNP was not likely to have significant environmental effects and that an SEA would not be required. The three SEA 'consultation bodies' – Natural England, Historic England and Environment Agency – were consulted on this decision and agreed with the Council's determination.

General Comments

8. It is considered that the draft JMNP has been prepared positively with a proactive attitude to achieving the desired outcomes of the parish, and at the same time helping to address relevant issues identified in the WCS Melksham Community Area Strategy (Core Policy 15). It is considered that care has been taken to understand how the draft JMNP can support the strategic development needs set out in the WCS and plan positively to support local development.
9. One general point is that it would be useful if the Plan contained paragraph numbers so that reference could be made to those in representations and in decisions on planning applications.
10. It is also recommended that the draft JMNP include a policies map that shows the extent of the policies and designations in one place. This map could include settlement boundaries at relevant settlements, Melksham town centre commercial area, Principal Employment Areas, any relevant heritage and environmental designations and the housing allocation at Middle Farm, Whitley. This policies map would make it clearer to see all designations in one place, for those reading the document and for those making decisions on planning applications coming forward in the neighbourhood area.
11. It is recommended that the reference to the review of the neighbourhood plan in point 3 on page 16 is amended to read '*Once the draft Local Plan Review has reached an appropriately advanced stage, this Neighbourhood Plan will be reviewed.*' It is considered that the plan can be reviewed earlier and should not wait until the Local Plan Review is adopted.
12. In the interests of accuracy and clarity, the references that relate to Wiltshire Council's resolution to acknowledge a climate emergency should be reviewed to ensure they are correct and appropriately used within the neighbourhood plan. Currently there appears to be some confusion, which possibly arises from the fact that the Council itself is committed to achieving carbon neutrality by 2030, whereas for the county of Wiltshire the resolution is to seek to make the county of Wiltshire carbon neutral by 2030. All references in the neighbourhood plan to carbon neutrality in Wiltshire by 2030 should be amended to refer to the correct wording of the resolution which is for Wiltshire Council to '*seek to make the county of Wiltshire carbon neutral by 2030.*' It should not refer to a '*commitment*' or a '*target*' or an '*aim*'. Paragraphs to be amended are on pages 14, 22, 30, 31 and 34.

Chapter 2 – Setting the Agenda

13. In the final paragraph on page 16, it is noted that the designation of Local Green Space (LGS) is being left to a future review of the neighbourhood plan. It may be worthwhile that, if there is evidence to designate LGS in this plan, then a policy is included. It is possible that certain sites may come under increasing pressure from developers so it may be prudent to designate some of these LGS now rather than leave to a later review.

Chapter 3 - Vision and Objectives

14. It is considered that the draft JMNP sets out a clear vision and objectives for the future of the plan area and that they deal with issues that are specific and of concern to local people.
15. Objective 1 refers to '*Reducing carbon emissions with the aim of becoming carbon neutral by 2030.*' This could be made clearer. Are the town and parish councils aiming to become carbon neutral by 2030? Or is there an aim for the neighbourhood area to be carbon neutral by 2030? Possibly amend to read '*Reducing carbon emissions **to seek to contribute to carbon neutrality in Wiltshire by 2030.***'
16. Another minor amendment that could also be made is to objective 5 which refers to supporting housing adjacent to existing settlements. Housing development outside of settlement boundaries is only allowed through certain exception policies and this could be made clearer in the wording of the objective. This objective could be amended to read '*Supporting sustainable development of new housing and associated facilities within settlements, **and exceptionally, adjacent to settlements.***' All references to this objective in the plan e.g. before the housing polices, should also be amended.

Draft Policy 1 – Sustainable Design and Construction

17. Where the Plan might innovatively influence the sustainability of design is in terms of gross and net housing density, transport options, and perhaps housing typologies. For example, building too low a gross density can reduce sustainability of public transport, and building large, detached "executive" houses each increase the rate of greenfield being used up to house people. It is noted in the community engagement that large homes are not seen as the priority but low net densities usually deliver larger houses. This is a difficult issue to contemplate, but as the Plan says, "*Great places to live ... where housing and infrastructure needs are balanced with global and regional issues*".

Draft Policy 2 - Flood Risk and Natural Flood Management

18. Wiltshire Council suggest that this policy could make reference to the drainage hierarchy i.e. i) re-use ii) infiltration iii) watercourse/surface water body vi) surface water sewer v) combined sewer, and that the last paragraph of the policy makes reference to the multiple benefits of Sustainable Drainage Systems (SuDS) as part of Green Infrastructure, such as improving water quality and water quantity, amenity and biodiversity.
19. SuDs should have multiple benefits (see Ciria guidance). A policy might explicitly require SuDS to comply with CIRIA Guidance, and to demonstrate at outline that an adequate area has been reserved for storage volumes without requiring inaccessible slopes.

20. Depending on how serious flood risk is, might a policy be useful that seeks to ensure the floor level of all new homes is raised slightly above the surrounding ground level, to ensure no water ingress during heavy rainfall?
21. The first paragraph on page 33 refers to new development not increasing the risk of flooding. It is recommended that this also refers to new development making use of opportunities to reduce the causes and impacts of flooding (where appropriate through the use of natural flood management techniques) as per NPPF paragraph 157.
22. It is also recommended that the supporting text to this policy references that development should also demonstrate adherence to the new National Design Guide, that includes guidance on integrated water management that enhances the character of a place and makes it more resilient. The design guide forms part of planning practice guidance that sets out the 10 characteristics that define good design and supports paragraph 130 of the NPPF.

Draft Policy 3 – Local Renewable and Low Carbon Energy Generation

23. The roof designs of both traditional vernacular housing and modern volume housing only really consider cost and to a degree aesthetics. In reality, the opportunity now always exists to use roof space for solar panels, which means that roof orientation could be something to strategically design into a scheme, to predominantly increase south facing areas. Does the neighbourhood plan have any view on this? WCS Core Policy 57 design guidance for 'keeping to local character' usually lets developers off the hook from doing anything more bespoke, and the number of roofs facing south is effectively a random by-product of the most profitable layout of limited mix of standardised house types.

Draft Policy 4 – Ultra Low Emission Vehicle Charging

24. The DfT consultation:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/818810/electric-vehicle-charging-in-residential-and-non-residential-buildings.pdf is closed and awaiting feedback. This is likely to be addressed in updated Building Regs and in the Local Plan Review. Wiltshire Council support this policy in principle but without government mandate this is not currently applied by Highways development control.
25. With regards to homes that do not have on plot parking, or group housing that use group parking, sometimes dissociating parking from the plot can actually allow for more flexible and attractive residential design as the (significant) constraint of the parking space is removed. It's quite extreme planning intervention but it has precedent https://en.wikipedia.org/wiki/Vauban,_Freiburg
26. Less extreme might be the preservation of any opportune spaces for retro-fitting existing neighbourhoods especially in the town centre, with small EV charging hub courts. For now, it might just be a case of recognising opportune spaces and saving the space so that it is not all lost to windfall housing development. (i.e. there could be a vacant plot where the NP feels a building is not suitable but an EV parking court is).

Draft Policies relating to housing (policies 5 – 8)

27. In relation to draft policies 5, 6, 7 and 8 relating to Housing, it is noted that connections have been made to the NPPF and to Wiltshire Core Strategy policies and that any new development would, therefore, reflect Affordable Housing policies and procedures as required.

Draft Policy 5 – Pre-application Community Engagement

28. Does this policy apply to outline stage only? At outline stage, so much detail on appearance and character is indicative that people may feel very disappointed with what comes back in at reserved matters stage, in terms of architecture, landscaping and generally quality. In fact, the feedback in the engagement appendix shows this to be a concern.
29. A more engaging community consultation should ideally occur at reserved matters stage too, perhaps early on making better use of social media and surveys, instead of applications just being uploaded to the planning portal as a *fait accompli*, often including bland or generic housing design. If a policy can enforce this could help raise the bar as builders are forced to literally face the community with their 'products'.
30. How could the Plan succeed better in engaging more people in the 15-29 age group and get their opinions on the type and character of houses and neighbourhoods? They will be the ones living with the legacy of what is delivered through the Plan. Is it possible that Mobile phone App based surveys might be more engaging to them? Could similar engagement be encouraged for applicants of major planning applications?

Draft Policy 6 – Housing in Defined Settlements

31. It is welcomed that the draft Plan allocates land for additional housing, but the decision to allocate just the one site at Whitley has been questioned, given the size of the neighbourhood area. It has been suggested that if other suitable sites have been assessed and identified for possible new housing growth, could those sites also be allocated in the Plan now rather than waiting for a review?
32. The reasons for allocating the one site at Whitley and not, for example, at Melksham, are understood but could be more fully explained in the plan. On page 41 under the heading '*The reason for the policy*' it is suggested the text is amended as follows: '*The total of 2,773 shows that the housing actually delivered/committed was 17% over the indicative housing requirements set out by the Core Strategy and this is likely to have increased since the base date of April 2018. Melksham town, in particular, has over delivered a significant amount of new housing in contrast to under delivery at the Principal Settlements, without a corresponding increase in infrastructure. Given that the Melksham Community area has already significantly exceeded the indicative housing requirements set out for it by the Wiltshire Core Strategy.....*'
33. The reference to supporting 'small' windfall housing developments within settlements needs to be amended. The policy refers in criteria i) to the need to accord with WCS Core Policy 2 which states that '*within the limits of development, there is a presumption in favour of sustainable development at the Principal Settlements, Market Towns, Local Service Centres and Large Villages.*' It is recommended that Draft Policy 6 is amended to read '*We will support proposals for sustainable housing development within...*'
34. Draft Policy 6 does not mention WCS Core Policy 43 on affordable housing provision, although Core Policy 45 is referred to. The provision of affordable housing is important, both at Melksham and Bowerhill and in the rural area and could also be referenced within this policy.

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

35. It is recommended that the text on page 43 is amended as follows: (1st para) '*Whilst the indicative housing requirement for the neighbourhood area has been significantly*

exceeded in the Plan period to 2026.....' (4th para) 'Taking into account the potential large-scale housing requirement for the neighbourhood area through the emerging Wiltshire Local Plan Review, **which may require a strategic approach to allocation through the Local Plan itself**, the decision was taken to give no further consideration in this plan to those sites adjacent to the settlement boundary of Melksham. These will be considered in a future review of the Neighbourhood Plan.'

36. The Council also makes the following comments on this policy as follows:

- i) The requirement for 30% affordable housing provision on-site should be included in the policy, not in the supporting text, and the reference to 5 affordable dwellings is incorrect – it should state 6 as we do not count downwards.
- ii) There should be a reference to securing an appropriate mix of house type and sizes on-site (WCS Core Policy 45) as referenced in draft Policy 6.
- iii) Why is there a requirement for a substantive western landscape boundary with Corsham Road but there is none proposed for the eastern field boundary? A substantive western buffer may also have forward visibility impacts.
- iv) Has enough analysis been done to reach the view that approximately 18 dwellings on the 0.9 hectares would be an efficient use of land and in turn would deliver quality urban design?
- v) A quantum of 18 units would constitute about 22dph, which is higher than the surrounding residential density to the south and on the other side of Corsham Road. That in itself may not be such an issue, but there is a disconnect where the policy seeks to 'reinforce' the form and character of the immediate setting.

37. Wiltshire Council confirm that there is no river, surface water or groundwater flood risk predicted at this site and that therefore it is a good site to allocate. It is recommended that criterion vi of the policy is amended to state '*include appropriate mitigation measures to prevent an increase in flood risk within the site or elsewhere and provide multifunctional benefits of amenity and biodiversity.*'

38. Wiltshire Council would like to ensure the JMNP group is aware of Community Led Housing whilst it is in the process of drafting the plan. Community led housing is about diversifying from the current mainstream housing delivery, it can be a way to get the views of the community better heard and better development to happen. Community Led Housing is also a way in which Affordable Housing can be developed and secured for local people in perpetuity, together with other defined community benefits.

39. If in the future an independent incorporated community body representing the community exists in Melksham and/or Melksham Without, such as a CLT, a policy or protocol in the plan for working with such a trust would future-proof the need for a developer to work with said trust. If the neighbourhood plan group would like to discuss Community Led Housing in more detail or receive further information about how it can be included in their plan please contact communityledhousing@wiltshire.gov.uk.

40. Wiltshire Council asks what specifically is meant by "*reinforces and enhances the historic form and character of Whitley*" as the village appears to have predominantly evolved as separate cul-de-sacs of 70s style housing, with a range of house types, landscaping and road design reflective of that era. That urban form is typically not replicated with contemporary development, and so

something more specific should be described to give weight to the policy. The consistent use of sandy coloured reconstone and brown pantile roofs and landscaped frontages appears to be a strong existing theme.

41. More fundamentally, can the Plan provide any evidence of what housing need is for this site so that the forthcoming mix is community-led and not developer-led? Is the figure based on any sketch layout? If the Plan is encouraging where it cannot enforce, then meeting National Space Standards should at least be a requirement.
42. Does the Plan believe that the land to the east of the site might be developed in future? If so, they might want to ensure that a direct connection through is preserved so that a logical connection is not precluded forcing future access to be convoluted.
43. What is the purpose of the 15m landscape buffer, along a street which is otherwise characterised by active frontage of homes (which reinforce the sense of the street being residential and not rural which can assist with traffic calming)? If this landscape buffer is retained, it should be removed from the developable area and the numbers recalculated. If a new landscape screen is desired along the eastern edge, then the developable area should also be pulled in a bit from that edge (this would actually align with policy 16 which asks that hedges become features within public space, not privatised).
44. The Core Strategy requires public art as part of new developments. What this might entail is often difficult for applicants and officers to establish. The neighbourhood plan might be able to offer further direction on this.
45. Does any of the open space on this site need to be given over to woodland, as part of Draft Policy 12 and Draft Policy 16? Can any more detail be added on what is desired of the open space, such as functions, equipment or seating? An example of a modern layout that attempts to be visible, distinctive, and of its time but could enhance the edge of any settlement is Lovedon Fields, Winchester, which has a compact mix of house types, including even some flats, and a large amount of communal space and shared surface streets:
https://www.habhousing.co.uk/sites/default/files/lovedonfields_compressed.pdf
46. Wiltshire Council have previously commented that the development criteria stipulated for the former allocated site (Whitley Farm) did not include any requirements with respect of ecology or the provision of ecological enhancements and biodiversity net gain. Having reviewed Draft Policy 7, it is pleasing to see the inclusion of site requirement point ii. which stipulates: *'incorporate habitat creation that achieves an overall net enhancement to biodiversity on site;'*. However, the policy should include the required net gain figure. Likewise, it is pleasing to see that site requirement point iii. has strengthened the requirements with regards to retention and management of existing hedgerows and planting of new hedgerow and trees; as well as requiring the inclusion of a buffer area at least 15m wide along the western boundary of the allocated site.

Draft Policy 10 – Employment sites

47. The former Christie Miller Sports Centre and golf course at Lancaster Road, Bowerhill, Melksham have been closed for some time. Wiltshire Council's Property dept. has advised that the site, which extends to approximately 6.3 hectares (15.5 acres) could be a suitable extension to the Bowerhill Industrial Estate. Accordingly, it could be identified for B Use Class development, potentially including the land between the golf course and the Semington Bypass. This would accord with WCS Core Policy 34: Additional Employment Land.

48. It is suggested that Figure 9 of the Plan on page 48 could be amended to include the former Christie Miller Sports Centre and golf course and potentially including the land between the golf course and the Semington Bypass. Alternatively, or in addition, the site could be specifically identified for B use class development.

Draft Policy 11 – Sustainable Transport and Active Travel

49. There is no mention in the policy of the public realm around the railway station, which is a unique asset to the town and its sustainability aspirations. The area around the station is very poor-quality urban realm, and the paths connecting it to the town centre are very poor too. A dedicated Railway Station Masterplan might seek to redress this.

Draft Policy 12 – Green Infrastructure

50. The inclusion of a dedicated GI policy and a change in the policy position within the framework of the neighbourhood plan is welcomed and accords with previous suggestions on the Plan. It is also noted that some of the policy wording has been amended and that the accompanying text provides examples of GI/GIS assets as per previous suggestions. The inclusion of Figure 11 is also welcomed and although unfortunately what is listed in the legend is not clear to see due to the resolution of the pdf, the figure appears to illustrate appropriate sites and GI assets.

Draft Policy 13 – Biodiversity

51. Similarly, the inclusion of a dedicated Biodiversity policy is welcomed. The strengthening of the policy wording and requirement for biodiversity net gain (BNG) is also good to see. It is noted that the policy itself does not stipulate what percentage BNG they wish developments to deliver but rather it is specified in the accompanying text that the policy is intended to reflect the NPPF and forthcoming Environment Bill which will mandate a BNG of 10%. It is important that any percentage requirement is set out in the policy itself in order to support planning decisions, as having the requirement set out in the policy will necessitate the quantification of BNG through calculations (using the Natural England Biodiversity Metric) which will need to be provided to the council alongside planning applications as evidence to demonstrate that developments will actually be able to deliver the BNG proposed.
52. In addition, whilst it is good to see reference to the forthcoming Environment Bill in the accompanying text to the policy, it is worth noting that the 10% BNG requirement that will be mandated by the aforementioned Bill is a minimum figure only. As such there is scope for LPAs and neighbourhood plan Steering Groups to stipulate a higher percentage requirement within biodiversity policies in local plans and neighbourhood plans respectively. Therefore, we would encourage the Steering Group to consider requiring a percentage that aligns with their own objectives for their plan area, as it is not obligatory to align exactly with what will be required by the Environment Bill; for example, a BNG requirement of 15-20% may be a reasonable percentage and would ensure a tangible benefit for biodiversity.
53. Wiltshire Council also suggest that Draft Policy 13 could be strengthened as there is currently some duplication across points i. to iv. especially in terms of reference to networks and GI. Point iii. references recreational opportunities ahead of biodiversity, however the focus of the policy is biodiversity and as such this should be the primary consideration with reference to creation of recreational opportunities being secondary.
54. It is also noted that the policy makes no direct reference to fauna and flora and protection thereof, or to any types of nature conservation sites, whether that be statutory or non-statutory sites; although some mention is provided in the policy rationale. In addition, Figure 12, whilst welcomed, only illustrates Melksham LBAP priority habitats and omits for example, the Bristol Avon River

which is a County Wildlife Site as well as being classified as priority habitat/Habitat of Principal Importance (HPI) under Section 41 of the NERC Act 2006. According to the legend, it also only illustrates grassland and floodplain and coastal grazing marsh priority habitats and omits ancient woodland and priority/HPI woodlands. Whilst it is appreciated there is a dedicated Trees and Hedgerows policy (Draft Policy 16) it would be prudent for Figure 12 to denote all key designated sites and priority habitats/HPIs.

55. Furthermore, it appears that Figure 11 associated with the GI policy includes SSSIs whereas this is omitted from Figure 12 where it is also of great relevance. The correlation between the policy itself and Figure 12 could be reinforced so that it is clear that the sites/areas/habitats illustrated on Figure 12 must be retained and protected. Some of these suggestions were detailed in our response at the pre-Regulation 14 stage and we are happy to discuss with the Steering Group if that would be useful.

Draft Policy 14 – Open Spaces

56. This policy, which identifies the need for open spaces to be protected, is a positive inclusion within the Plan and it's very useful that the key areas are illustrated on Figure 13. Unfortunately, due to the resolution of the pdf, it is difficult to see the areas listed under the legend against the areas highlighted in the figure. It may be prudent to consider amending the title of Figure 13 as the current title may cause a little confusion and/or result in perceived overlap given the dedicated GI policy earlier in the Plan.

Draft Policy 16 – Trees and Hedgerows

57. This policy seems reasonable but could also refer to native planting replacements of suitable stock sizes and to allow for tree loss (even veteran trees) through arboriculture reports that identify prevalent health conditions that will lead to decay, disease and death.
58. The special consideration and protection of trees and hedgerows that Draft Policy 16 affords is very positive. The policy references Figure 11, however, it would be sensible for this policy to have its own dedicated figure which could also show ancient trees; this data can be obtained from the Woodland Trust. It is noted that this policy does not stipulate the requirement for buffers alongside ancient woodland and/or priority/HPI woodland and ancient/veteran trees in the event of development being proposed adjacent or near to such areas. Given that Draft Policy 7 pertaining to the allocated site sets out a required buffer alongside the hedgerow delineating the western extent of the site, we would suggest that a similar, or stronger approach needs to be taken with regards to Draft Policy 16.
59. At present, it is suggested that there seems to be some duplication and/or confusion between the GI, Biodiversity and Trees and Hedgerows draft policies and their associated figures, with some items perhaps not quite falling under the most appropriate policy and/or being omitted from the most appropriate policy. We would be happy to provide further steer if the Steering group wishes to discuss this further.

Draft Policy 17 – Landscape Character

60. There is a heartening acknowledgement of how the parish's landscape is an important material consideration. There is also information presented from the Landscape Character Assessment and other relevant sources which outline the present visuals and value in the local landscape. However, there may well be elements of historic landscape character (tangible elements of past land use that influence the present-day landscape) that have an influence on the sense and place of character of the present-day town and its environs. This information was also provided along with the Historic Environment Record (HER) data, and maybe could be further explored (even if with just some short statements) in 'Section 4.6.2 –Landscape Character'.

61. Both heritage assets and historic landscape could be covered by the existing policies derived from the sections set out as the objectives of the Neighbourhood Plan. It should also be seen when looking at appropriate development and future aspirations that heritage can be seen as a positive force for change and not merely something to conserve/preserve. It could influence design, the wellbeing agenda or help define local distinctiveness – what it is that makes Melksham a unique place.

Draft Policy 18 – Locally Distinctive, High Quality Design

62. Please be aware that on 23 July 2020, Design for Homes announced the release of Building for a Healthy Life. This will replace Building for Life 12 (B4L12). Building for Life (B4L12) is an industry standard for well-designed homes and neighbourhoods which is endorsed by the Government.

63. This policy seems to refer to all types of development in the neighbourhood area, even minor household applications. It is suggested that a requirement for a Design Compliance Statement for minor household applications is too onerous and that maybe this requirement should be limited to larger applications only.

64. At the beginning of the Plan, it states that planning policies '*should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared*'. There is concern that Policy 18 isn't very distinct from what the WCS Core Policies already say. For example:

- **Draft policy 18:** '*Melksham Town Council and Melksham Without Parish Council will support development that contributes positively to the conservation, enhancement and extension of Melksham's quality of place and local distinctiveness*' which is similar to **WCS Core Policy 57(iii):** '*responding positively to the existing townscape and landscape features in terms of building layouts, built form, height, mass, scale, building line, plot size, elevational design, materials, streetscape and roof lines to effectively integrate the building into its setting*' and **(vi):** '*making efficient use of land whilst taking account of the characteristics of the site and the local context to deliver an appropriate development which relates effectively to the immediate setting and to the wider character of the area*'
- **Draft policy 18:** '*Applicants should submit a design compliance statement to demonstrate how a proposal has responded positively to the character of the area in which it is located*' and '*Proposals for major development must demonstrate through a masterplan how the proposed development layout, building designs, materials and detailing complement and extend the positive characteristics of Melksham and Melksham Without's settlements and landscape*' which is similar to **WCS Core Policy 57(xiii):** '*the case of major developments, ensuring they are accompanied by a detailed design statement and masterplan, which is based on an analysis of the local context and assessment of constraints and opportunities of the site and is informed by a development concept, including clearly stated design principles, which will underpin the character of the new place*'.

65. In order to develop some design policies that fulfil the criteria of being distinct:

- What is *unique/unusual* about Melksham that is worth celebrating and reinforcing in a modern way?

- What is *missing* from or *wrong with* recent new development in Melksham. How could the existing Core Strategy's Policies' wording be refined or supplemented to better achieve local aspirations?
- In what ways might the future housing development of Melksham be distinct from current, recent and historic development and eventually be looked back upon fondly as being *of its people and its time*?

66. The Melksham Design Guide is more a helpful guide to the town as it exists today – it describes the “positive and distinct characteristics” of some areas, but leaves this as a starting point for would-be architects to develop and justify their own proposals. There is a good degree of instruction within it.

67. To try and test its effectivity in regulating a scheme, the interpretation of the guidance might be as follows:

- Any large development should be designed in a way to make it look and feel like it is the product of different developers with varying characters of place and house types (less obviously a single volume builder using a nationally standard house type).
- Primary streets within new developments should be designed distinctively wider and as tree lined 'avenues' with soft verges.
- Areas of communal green space should be visually or physically linked to primary movement routes as opposed to private drives or obscure corners of sites.
- Layouts need not retain a strict build line and can utilise a mix of off-street parking arrangements.
- Generally, the character of the new place should feature houses set within a front garden that individuals can personalise.
- Existing landscaping should be incorporated into public realm, not privatised or hidden. This means layouts should generally not back onto field hedgerows edges.
- Houses should mostly be standard 2 storey but 3 story could be used in the town centre, or on main streets and focal nodes in suburban development, if sensitively done.
- A range of roof forms can be accommodated within new development. New development could (but not should) seek to choose the optimum design for the location and orientation.
- Facing materials should consist of a mix of red brick, white/cream render and recon. stone. There is no specific guidance on the proportion of the use of each, or colour and tone/texture of these or where the stone should come from. Most roofs to reflect clay tiles, but no particular colour/style specified.
- Elevation design ought to look to use some interesting traditional detailing found in the area, such as stone quoins, tile hanging, decorative brickwork, or perhaps some decorative timber cladding. Possibly the guide is suggesting this could be more effective if themes applied over small groups of houses rather than pepper potted across sites, but this is not 100% clear.

- There is not specific guidance on the colours and materials or styles of doors and windows etc. so a developer would be able to specify all houses in schemes to be a generic white UPVC, and generic casement windows.
- Whilst most developers will prefer to not include any front boundary treatment, stone walling and privet hedge type front boundaries might be expected on some streets to help create character. The developer will probably prefer to opt for cheap metal railing.
- Plot typologies which fill the space in front of a house with 2 parking bays should be avoided, because of the lack of street/ plots enclosure and the increased amount of continuous hardstanding created. Where they are used significant amounts of tree planting should be used to break up the parking.
- In rural settlements, layouts should generally have a less formal (rectilinear) structure with varied build lines and house orientations – this will invariably relax the density somewhat by opening up more space between buildings.
- Accordingly, street layouts should not be all rigidly straight, and should have a less formal character where possible – maybe narrower shared surfaced streets?
- The extra space should be used for more landscaping and trees with large canopies.
- Some areas of more formal housing and terracing could be created so long as the overall 'loose' character is not lost.
- Boundaries treatments guidance similar to above
- Building form should be authentically of its time, but with enough variety that it does not dominate or dilute the existing context.
- Materials guidance similar to above. More expensive natural stone (as opposed to common reconstituted stone) is not explicitly requested in the guidance.

68. In future, with allocations surrounding the town, is it the intention that all sites are treated the same in terms of the design guidance on character, or might some sites be acceptably quite different in appearance or scale in order to achieve something distinguishable from another allocation site, in ways supported by the NP?

69. For example, Graven Hill, the Self-Build development in Bicester has permitted housing that is very mixed and diverse, because the concept there is that individuals create their own home. And in the North west of Swindon, the Tadpole Garden reflects the very formal Garden City style more than it does any traditional part of Swindon.

70. Elsewhere in the country, like in the Lovedon Fields example, various edge of settlement sites are developed in a more contemporary style which is often most distinguishable for their deliberately nonlocal styles (e. g. rows of houses with striking gable fronts) and attention to contemporary detailing, than for how it blends in with the surrounding building stock.

71. This neighbourhood plan has the opportunity to consider and debate all the possibilities, and direct developers and planning officers early on as to what local people want or might be open to, should a more aspirational developer be looking to get involved.

Draft Policy 19 – Local Heritage

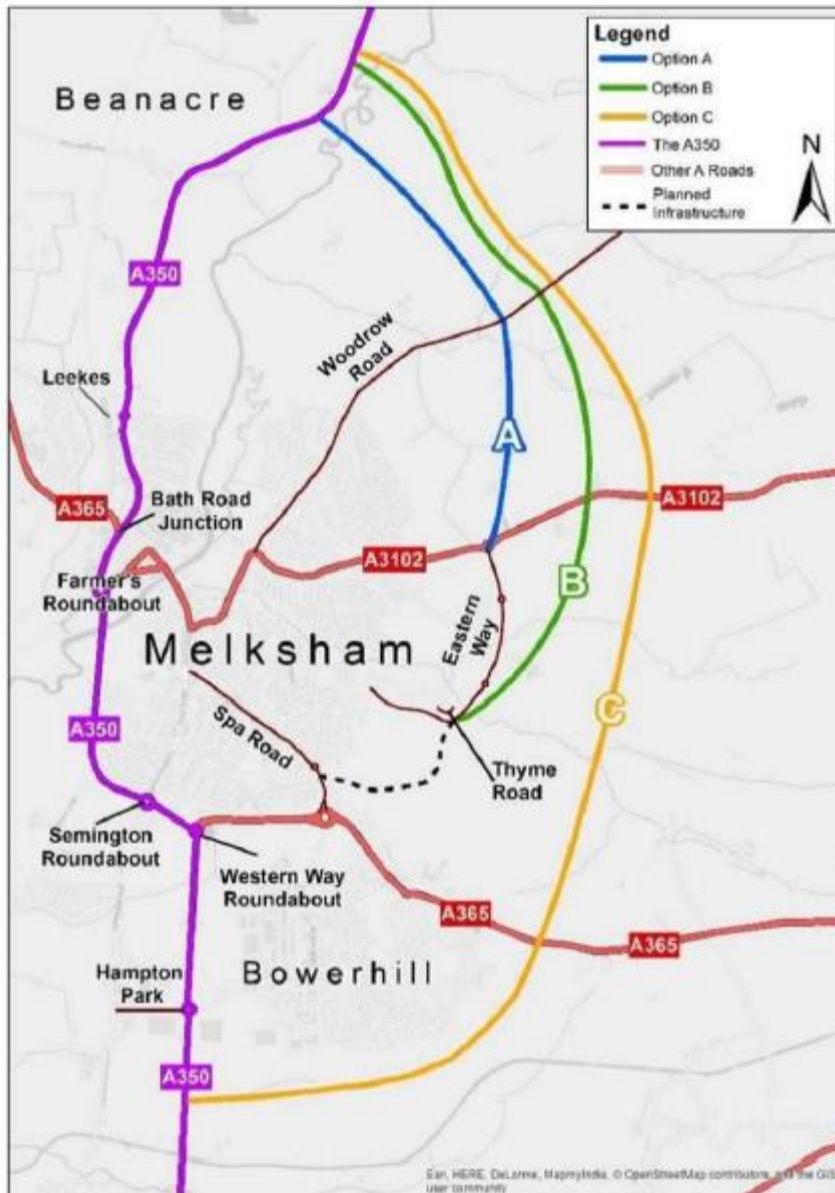
72. This seems to be a sensible and measured policy that does not cause any concerns regarding the protection of heritage assets.
73. It is noted that amongst the supplementary evidence, the 2006 Urban Design Study is a useful document by a well-respected consultant (Colin Davies Assoc) and its inclusion in this process gives it a measure of additional weight. The group seem to have relied upon this document to provide examples of unlisted buildings of 'local heritage importance'. However, the Urban Design Study is not really intended to be a detailed heritage assessment and, whilst it is a useful start, the identification lacks the rigour which is suggested by current guidance on identifying non designated heritage assets for local lists and so on. The group may therefore want to consider whether they wish to follow this up with a bit more detail which might give their policy more weight.
74. It is noted that the Neighbourhood Plan group approached the Archaeology Service to gather information from the county Historic Environment Record (HER) relating to principally archaeology and historic landscape character. This is very heartening and the full gazetteer seems to be included as an appendix. There was also a clear statement in the plan agenda to protect heritage and make use of the assets in the town and parish to make Melksham a pleasant place to live.
75. Nevertheless, the policies that relate to heritage only focus on built heritage and conservation areas – with only a small amount of archaeology (medieval era onwards) being mentioned in the historic background to the parish and town. It would be nice to see more acknowledgement that heritage comprises archaeology as well as historic buildings/ structures. Archaeology can add to the character and sense of place and people walking and accessing heritage sites can have a role in wellbeing. This could be done by expanding on the information outlined in 'Section 4.6.4 – Local Heritage'.
76. Both heritage assets and historic landscape could be covered by the existing policies derived from the sections set out as the objectives of the Neighbourhood Plan. It should also be seen when looking at appropriate development and future aspirations that heritage can be seen as a positive force for change and not merely something to conserve/preserve. It could influence design, the wellbeing agenda or help define local distinctiveness – what it is that makes Melksham a unique place.

Draft Priority Statement 4: Transport Infrastructure - By-Pass

77. The second paragraph in this statement is not quite correct and should be amended. Rather than funding confirmed, DfT requested further development of the schemes through a contribution to the Outline Business Case. This is the award text from the DfT:

'I am delighted to say that the A350 Melksham Bypass and A338 Southern Salisbury Junction Improvements schemes has been approved to progress to the next stage of development under the Major Road Network (MRN) and Large Local Majors (LLM) programme. To help the scheme progress to the next stage, the Department will make a contribution of £1.33 million and £170,000 respectively towards the costs of developing the Outline Business Cases (OBC).

78. The bypass route options map on page 85 is not the current one and should be replaced with the following:



79. I hope this provides a useful summary of our views and we look forward to discussing these comments with you as the plan progresses to the next stages.

Yours sincerely,

David Way
Senior Planning Officer