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## MELKSHAM WITHOUT PARISH COUNCIL

Clerk: Mrs Teresa Strange

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Tuesday 24<sup>th</sup> June 2025

To all members of the Council Planning Committee: Councillors Richard Wood, Alan Baines, John Glover (Chair of Council) David Pafford (Vice Chair of Council), Mark Harris, Peter Richardson and Martin Franks

You are summoned to attend the Planning Committee Meeting which will be held on **Monday 30<sup>th</sup> June 2025 at 7.00pm** at **Melksham Without Parish Council Offices (First Floor), Melksham Community Campus, Market Place, SN12 6ES** to consider the agenda below:

**TO ACCESS THE MEETING REMOTELY, PLEASE FOLLOW THE ZOOM LINK BELOW. THE LINK WILL ALSO BE POSTED ON THE PARISH COUNCIL WEBSITE WHEN IT GOES LIVE SHORTLY BEFORE 7PM.**

<https://us02web.zoom.us/j/2791815985?pwd=Y2x5T25DRlVWVU54UW1YWWE4NkNrZz09&omn=86718310170>

Or go to [www.zoom.us](http://www.zoom.us) or Phone 0131 4601196 and enter: **Meeting ID: 279 181 5985**  
**Passcode: 070920.** Instructions on how to access Zoom are on the parish council website [www.melkshamwithout-pc.gov.uk](http://www.melkshamwithout-pc.gov.uk). If you have difficulties accessing the meeting please call (do not text) the out of hours mobile: 07341 474234

**YOU CAN ACCESS THE AGENDA PACK HERE**

Yours sincerely,

Teresa Strange, Clerk



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## AGENDA

1. **Welcome, Announcements & Housekeeping**
2. **To receive Apologies and approval of reasons given**
3. **Declarations of Interest**
  - a. To receive Declarations of Interest.
  - b. To consider for approval any Dispensation Requests received by the Clerk and not previously considered.
4. **To consider holding items in Closed Session due to confidential nature**

*Under the Public Bodies (Admission to Meetings) Act 1960, the public and representatives of the press and broadcast media be excluded from the meeting during consideration of agenda items (14biii) where publicity would be prejudicial to the public interest because of the confidential nature of the business to be transacted.*
5. **Public Participation**
6. **To consider the following new Planning Applications:**
  - a. [PL/2025/04991](#) **Shaw Court, Bath Road, Shaw, Melksham, SN12 8EE**  
To fully repair the stone tiled roof  
Applicant: Mr Stefano Patacchiola. Comments by **11 July 2025**
  - b. [PL/2025/05108](#) **49 BLENHEIM PARK, BOWERHILL, MELKSHAM, SN12 6TA**  
Full Planning Permission: Proposed Conversion of Existing Hair Salon into 2 x 1 Bed Dwellings and Insertion of Dormer Rooflights  
Applicant: Mr Ponsford. Comments by **11 July 2025**
  - c. [PL/2025/03212](#) **Roundponds Farm, Shurnhold, Melksham, SN12 8DF**  
Full Planning Permission: The removal of existing gas fuelled generators (retrospective) and proposed installation of battery energy storage system (BESS) and associated equipment.  
Applicant: HC ESS3 LIMITED. Comments by **18 July 2025**
  - d. [PL/2025/05205](#) **498 Semington Road, Melksham, SN12 6DX**  
Householder planning permission: Side extension and alterations to the dwelling house and Alterations to the detached outbuilding.  
Applicant: Ms J Lund. Comments by **17 July 2025**
  - e. [PL/2025/05137](#) **SANDRIDGE FARM, BRICK HILL, BROMHAM, WILTSHIRE, SN15 2JL**  
Prior Approval - Class Q - Agricultural to Dwellinghouse: Class Q conversion and extension of existing building to create 6 No. dwellings  
Applicant Name: Mr & Mrs C Jaggard. Comments By: **17 July 2025**

7. **Amended Plans/Additional Information:** To comment on any revised/amended plans/additional information on planning applications received within the required timeframe (14 days).
8. **Current planning applications:** Standing item for issues/queries arising during period of applications awaiting decision.
- a. [PL/2024/07097](#): **Land south of Snarlton Farm, Snarlton Lane, Melksham, SN12 7QP:** Erection of up to 300 dwellings (Class C3); land for local community use or building (incorporating Classes E(b), E(g) and F2(b) and (c)); open space and dedicated play space and service infrastructure and associated works on and South of Snarlton Farm (Outline planning application with all matters reserved except for two pedestrian and vehicle accesses (excluding internal estates roads) from Eastern Way) - Resubmission of PL/2023/07107). Applicant: Catesby Estates Promotions Limited.

**To note new comments from Active Travel England, Natural England, Drainage, Lacock Parish Council and the Environment Agency.**

- b. [PL/2024/11665](#) **Land at, Semington Road, Melksham, SN12 6DP (Rear of Townsend Farm, Phase 2)**  
Application for reserved matters pursuant to application ref: PL/2022/08155 for appearance, scale, layout and landscaping  
Applicant: Living Space Housing

**To note new comment from Public Protection.**

**To consider any response to feedback given to Wiltshire Council following meeting with developer on 16<sup>th</sup> June 2025**

- c. [PL/2024/10674](#): **Land off Woodrow Road, Woodrow Road, Melksham, SN12 7AY**  
Outline application with all matters reserved except for access for the development of up to 70 dwellings, open space, ecological enhancements, play space, associated infrastructure (including drainage structures and works to the public highway), access, parking, servicing and landscaping. Applicant: Waddeton Park Ltd

**No new comments or documents to date**

- d. [PL/2024/10345](#): **Land north of the A3102, Melksham (New Road Farm)** The construction of 295 homes; public open space, including formal play space and allotments; sustainable drainage systems; and associated infrastructure; with 0.4ha of land safeguarded for a nursery. The principal point of access is to be provided from a new northern arm on the existing Eastern Way/A3102 roundabout junction, with a secondary access onto the A3102. Additional access points are proposed for pedestrians and cyclists. Applicant: Bloor Homes South West

**To note new comment from the Environment Agency**

- e. [PL/2024/09725](#) **Land off Corsham Road, Whitley, Melksham (Middle Farm)** Outline planning application (with access, layout and landscaping to be approved) for up to 22 dwellings, new access off Corsham Road, public open space, drainage and associated works.

**No new comments or documents to date**

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- f. **PL/2025/00626**: Land North of Berryfield Lane, Melksham, SN12 6DT: Outline planning application for up to 68 dwellings and formation of new access and associated works (All matters reserved other than access).

**No new comments or documents to date**

**To note meeting with developer planned for Thursday 3<sup>rd</sup> July 2025**

- g. **PL/2024/11426**: Land to the South of A365 Bath Road and West of Turnpike Garage, Melksham, Wilts (Gompels): Construction of warehouse with office space, parking and associated landscaping including site access.

**To note the application will be considered at Strategic Planning Committee on 1<sup>st</sup> July 2025 <https://cms.wiltshire.gov.uk/ieListDocuments.aspx?CId=145&MId=16028&Ver=4>**  
**To consider any further comments to be made by Melksham Without Parish Council representative attending.**

- h. **PL/2025/03513** Land North of Top Lane, Whitley, Melksham (E388633, N166527)  
Permission in principal: Permission in principal for up to 6 dwellings  
Applicant: Ms Patricia Eaton

**No new comments or documents to date**

**9. To consider Environmental Permit application EPR/SB3455TZ/A001**

Environmental Permit for the remediation of radioactive contaminated land at the former RAF Bowerhill station, Lancaster Road, Bowerhill, Melksham, Wilts, SN12 6SS (former golf course)

**10. Premises Licences applications and decisions:**

- a. **To receive and consider feedback from WTF Festival on 20<sup>th</sup> and 21<sup>st</sup> June at Oakfield Stadium, Eastern Way, Melksham, SN12 7GU**

**11. Proposed Energy Installations**

- a. **Halfway House Farm, Beanacre proposed Battery Energy Storage System (BESS)**

**To consider response to Enray Power consultation regarding the proposal for a BESS. Comments by 3<sup>rd</sup> July 2025**

- b. **Lime Down Solar**: A Targeted Consultation is running from Tuesday 03 June to Friday 11 July 2025

**To consider a response to the Targeted Consultation and to consider correspondence from the Stop Lime Down Campaign (deferred from the meeting on 9<sup>th</sup> June 2025)**

- c. **National Grid related to the substation upgrade**

**To note meeting planned with National Grid at MWPC offices on Monday 22<sup>nd</sup> July**

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- 12. Planning Enforcement:** To note any new planning enforcement queries raised and updates on previous enforcement queries.
- 13. Planning Policy:**
- a. **Wiltshire's Housing Land Supply Statement**  
To consider the implications of the Land Supply Statement
  - b. **Joint Melksham Neighbourhood Plan:**  
To note minutes of Neighbourhood Plan Steering Group meeting held on 5<sup>th</sup> June 2025
  - c. **Wiltshire Council's Draft Local Plan Examination:** To consider any updates  
<https://www.localplanservices.co.uk/wiltshirelpexamination>
- 14. S106 Agreements and Developer meetings: (Standing Item)**
- a. **Updates on ongoing and new S106 Agreements**
    - i. **Land at Blackmore Farm, Sandridge Common, Melksham, SN12 7QS**  
**[PL/2023/11188](#)**: Demolition of agricultural buildings and development of up to 500 dwellings, up to 5,000 square metres of employment, land for a primary school, land for mixed use hub, open space. Applicant: Tor & Co for Gleasons
    - ii. **Pathfinder Place:**
      - To note any update on outstanding issues and consider way forward.
      - To note update regarding transfer of Play Area
    - iii. **Buckley Gardens, Semington Road (PL/2022/02749: 144 dwellings)**
      - To note any updates and consider a way forward.
    - iv. **To note any S106 decisions made under delegated powers**
  - b. **Contact with developers:**
    - i. **Land South of Western Way for 210 dwellings and 70 bed care home (PL/2022/08504) – reserved matters**  
To consider feedback from meeting with developer on 30<sup>th</sup> June 2025
    - ii. **Land at Bath Road (adjacent to Melksham Oak) - pre-application**  
To receive feedback from public consultation held on 16<sup>th</sup> June 2025 at Oakfield Melksham Town Football Club and consider any formal response.
    - iii. **Land at the former Countrywide Farmers PLC, Bradford Road, Melksham**  
To agree attendees at Melksham Town Council Economic Development meeting.
    - iv. **Land at Old Love's Farm, Bath Road, Bowerhill**  
To consider feedback from meeting with developer on 30<sup>th</sup> June 2025
    - v. **To review the list provided to Developers on what the Parish Council would like to see provided.**  
To approve the updated list

Copy to all Councillors

**NOTES OF MEETING WITH LIVING SPACES  
ON MONDAY 16<sup>th</sup> June 2025 AT 1.00PM  
RE: LAND AT SEMINGTON ROAD (REAR OF TOWNSEND FARM  
(PL/2023/008098 Ph1 and PL/2024/11665 Ph2)**

**Present:** Councillor David Pafford (Vice Chair of Council)  
Councillor Richard Wood (Chair of Planning)  
Councillor Alan Baines (Vice Chair of Planning)  
Councillor Mark Harris (Planning Committee Member)  
Councillor Martin Franks (Planning Committee Member)  
Teresa Strange (Clerk to Melksham Without)  
Fiona Dey (Parish Officer, Melksham Without)  
Wiltshire Councillor Andrew Griffin (Melksham Without West & Rural)  
Luke Webb, Planning Director, Living Spaces

Luke explained that he was attending to provide a general catch up with updates on the progress of Phase 1, access challenges, the construction management plan (currently on version 7), residents' concerns and the progress of Phase 2.

Members explained that the residents of Townsend Farm were unhappy with the ongoing use of Townsend Farm to access the site and the damage that was being caused to their property and to the road. There was also a separate issue (not within the remit of the Parish Council as a civil matter) regarding the Householders' right to have their septic tanks overflow into the adjacent field (where building work is now in progress). They feel that they are being held to ransom to pay to be connected to mains sewage for the overflow. Luke committed to follow this up with Living Space & Sovereign Housing.

Members understood that building of the proper access to the site was being held up by the need for BT to move their underground equipment. It was understood that BT had recently attended site to perform the work but stopped due to discovering electricity cables that would need to be moved. Members were keen to understand when the proper access would be available.

Luke acknowledged that BT had been slow. He explained that BT take approximately 6-9 months to schedule each requested package of work. Therefore, the recent complications would result in another 6-9 months before BT would return as the developers cannot undertake the work themselves.

He explained that the dwellings cannot be occupied until the proper access is available for use. Therefore, Living Space have proposed to move the site entrance, by approximately 1m to avoid the BT equipment.

Members challenged how the project was planned and why the BT work was not scheduled sooner to mitigate for these further delays, or why the amendment to the access was not proposed sooner. Luke re-iterated that the BT work was scheduled properly and was always expected at about this time but the need for the additional work was unexpected.

Luke explained that they had been advised that the relocation of the site entrance would be considered a non-material amendment, with a 28-day approval timeline, and wouldn't need a full consultation provided the Parish Council and Highways provided agreement in principle. He stated that Highways had already agreed to the proposed change.

Luke explained that occupation of the first dwellings was expected in October or November and that the access would need to be in place before then. He commented that building the proper access would take approximately 2 months from the point the amendment was agreed. It was clarified that the proper access would be available 3 months from today, but that construction traffic would be able to start using it sooner.

Members stressed that the access via Townsend Farm must be closed as soon as the new access is available (i.e. on the same day) and that the developer would also need to put right any damage caused to Townsend Farm road surface, a private road, as soon as the access was closed.

**Members agreed to take a proposal to the Full Council Meeting that evening (16<sup>th</sup> June 2025) as it was time sensitive to support the revised access proposed by the developers provided:**

- **the highways officer is happy with the sight lines etc.**
- **that as soon as the new access is usable, the route through Townsend Farm is discontinued immediately and the road surface repaired**

The Clerk raised concerns about issues that had been caused by construction lorries incorrectly using Berryfield Lane and Berryfield Park to access the site. Although they were no longer using this route, damage had been caused to the kerbs and road surface (photos to be shared). In addition, mud and silt had built up in the drains which the Parish Council had to have cleared using Wiltshire Council's discretionary gulley cleaning service, as it had caused deep surface water following heavy rain in a flood prone area.

It was noted that Melksham Without Parish Council continued to object (27 May 2025) to the Phase 2 application (PL/2024/11665) as concerns were raised that the layout would require refuse collectors to move bins 25m (in each direction) at multiple locations on the site. Members felt that this was unacceptable, and that the layout should be redesigned to allow better access for the bin lorries and not cause additional workload for the refuse collectors.

Luke explained the bin drag distances were within the permitted range and that the concern had not been raised by Highways. He commented that to improve the bin drag distances there would be a loss of green areas. Members commented that an alternative would be to reduce the number of dwellings.

In response to earlier comments (13 February 2025) made by Melksham Without Parish Council, Luke commented that Sovereign Housing are including a LEAP (Local Area Equipped for Play) as part of Phase 1 which would include 4 pieces of equipment (a plan is not yet available). Members questioned who would manage the

area. Luke explained that he would need to check the s106 agreement, but it was possibly Sovereign Housing. Members reiterated that the Parish Council would wish to have first refusal for the LEAP.

It was noted that Sovereign Housing may not be the developers for Phase 2 of the development.

Members reiterated their previous requests to ensure that pedestrians cannot access the A350 from the north of the site, as it is a dangerous point at which to cross the busy A-road. They requested that the northern boundary be made impenetrable by increased vegetation and/or other boundary treatment. The temporary, not agreed, site access (installed gate) that has been used from the northwest corner of the site must be closed off to pedestrian and vehicular traffic and made impenetrable. Pedestrian access from the north west corner of the site for residents to easily access the parish council's allotment sites and the Right of Way networks to the canal and river were welcomed.

The Clerk highlighted that Berryfield Lane had been subject to fly tipping, and that while it was not resulting from the development, help to clean up the area would be welcomed by the community.

A question was raised about whether Phase 2 had started as there had been recent activity on the site. Luke confirmed that Phase 2 had not started but that ground water monitoring had been conducted.

Luke confirmed that he would take the points that had been raised back to the office.

The Clerk confirmed that she would let Luke know the outcome on the proposed change to the site access following the Full Council Meeting that evening.

Meeting closed at 1:54pm



## Fiona Dey

---

**From:** Teresa Strange  
**Sent:** 17 June 2025 10:38  
**To:** Luke Webb  
**Cc:** andrew.griffin@wiltshire.gov.uk; O'Donoghue, Ruaridh; Fiona Dey  
**Subject:** Fw: Melksham Access - Revised Plan  
**Attachments:** Access Plan.pdf  
  
**Categories:** Planning Lists

Hi Luke and Ruaridh

Thanks for sending this through Luke.

I confirm that at the Melksham Without parish council meeting last night they formally agreed that they supported this revised access as long as the highways officer is happy with the sight lines etc. They also request that as soon as the new access is usable, the route through Townsend Farm must be discontinued immediately and the road surface repaired, as agreed when we met yesterday.

Kind regards

Teresa

---

**From:** Luke Webb <lwebb@livingspacehousing.co.uk>  
**Sent:** Tuesday, June 17, 2025 08:46  
**To:** Teresa Strange <clerk@melkshamwithout-pc.gov.uk>  
**Subject:** Melksham Access - Revised Plan

Morning Teresa,

Great to catch up again yesterday, I felt the meeting was very useful for all in attendance.

As discussed, I have attached the plan showing the alternative access which we are proposing moves south to avoid the BT box. It was agreed in the meeting yesterday that this is a suitable solution and would allow for the access to be delivered in a shorter timeframe than currently proposed thus allowing the current construction access to be closed sooner.

We discussed the submission of this via an NMA and given the positive view from the Parish on this access, the members agreed that an NMA was suitable.

If you could confirm this morning, I shall formalise the submission today.

Thanks again and enjoy the holiday.

Kind regards,

**Luke Webb** *MRTPI*  
Planning Director

T: 0121 752 3726  
M: 07399250872

[livingspacehousing.co.uk](http://livingspacehousing.co.uk)

Hayfield House, Arlestone Way, Shirley, B90 4LH

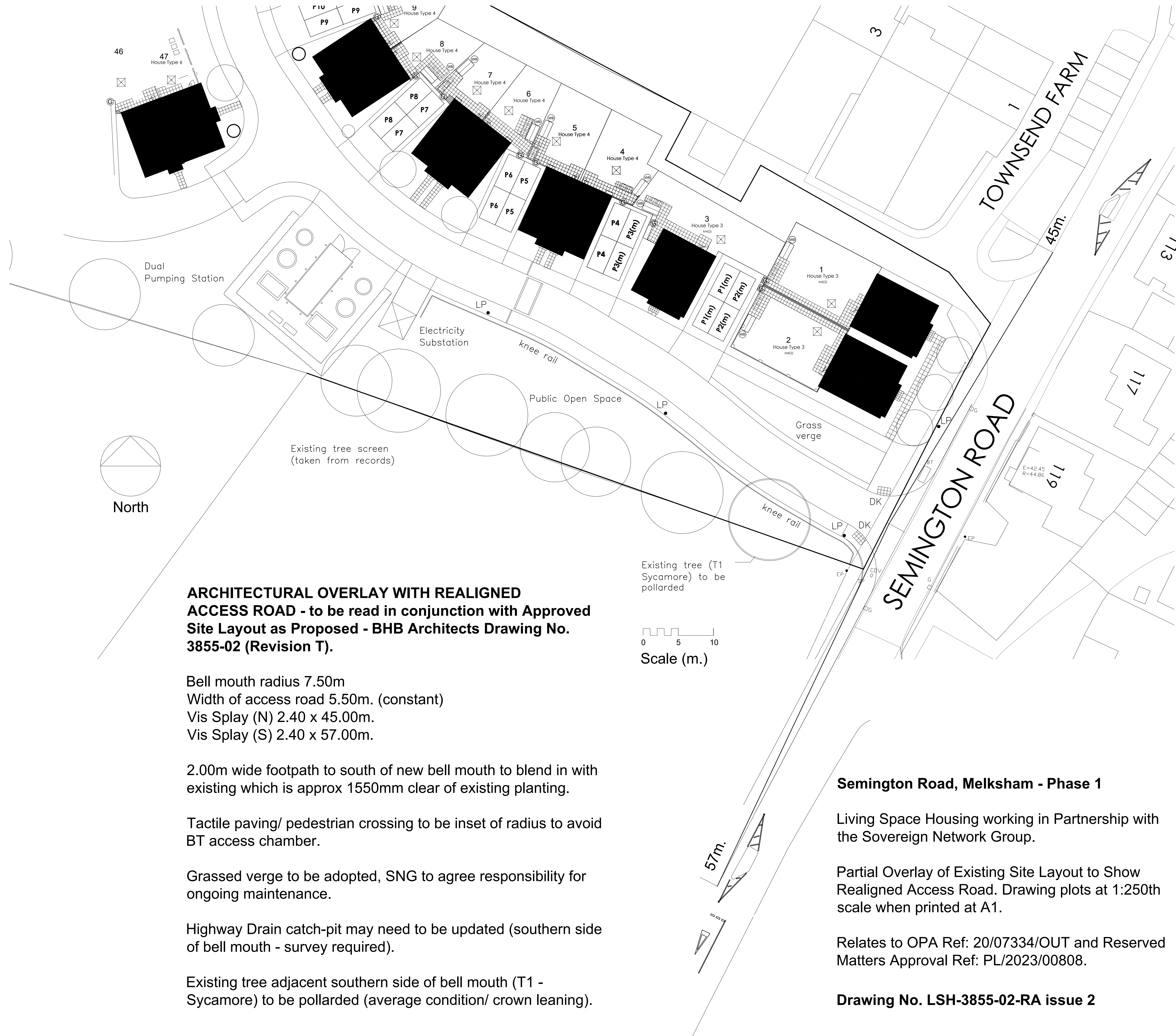


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**ARCHITECTURAL OVERLAY WITH REALIGNED  
ACCESS ROAD - to be read in conjunction with Approved  
Site Layout as Proposed - BHB Architects Drawing No.  
3855-02 (Revision T).**

Bell mouth radius 7.50m  
Width of access road 5.50m. (constant)  
Vis Splay (N) 2.40 x 45.00m.  
Vis Splay (S) 2.40 x 57.00m.

2.00m wide footpath to south of new bell mouth to blend in with  
existing which is approx 1550mm clear of existing planting.

Tactile paving/ pedestrian crossing to be inset of radius to avoid  
BT access chamber.

Grassed verge to be adopted, SNG to agree responsibility for  
ongoing maintenance.

Highway Drain catch-pit may need to be updated (southern side  
of bell mouth - survey required).

Existing tree adjacent southern side of bell mouth (T1 -  
Sycamore) to be pollarded (average condition/ crown leaning).

**Semington Road, Melksham - Phase 1**

Living Space Housing working in Partnership with  
the Sovereign Network Group.

Partial Overlay of Existing Site Layout to Show  
Realigned Access Road. Drawing plots at 1:250th  
scale when printed at A1.

Relates to OPA Ref: 20/07334/OUT and Reserved  
Matters Approval Ref: PL/2023/00808.

**Drawing No. LSH-3855-02-RA issue 2**

23 June 2025

Dear Sir/Madam

Application No:	PL/2024/11426
Application Type	Outline planning permission: All matters reserved
Proposal:	Construction of warehouse with office space, parking and associated landscaping including site access
Location:	Land to the South of A365 Bath Road and West of Turnpike Garage, Melksham, Wilts
Applicant:	Gompels Healthcare Ltd

This is to inform you that under the Council's delegation scheme the above application will be determined at the Strategic Planning Committee at Council Chamber - County Hall, Trowbridge BA14 8JN on 01 July 2025. The meeting will commence at 10.30am.

The agenda and the committee reports for the meeting are published 5 clear working days prior to the committee meeting (e.g. Tuesday the week before a Wednesday meeting where there is no bank holiday). These are available on the Website [Browse meetings - Strategic Planning Committee | Wiltshire Council](#). Please note that the meeting will be live streamed on the [Council's YouTube Channel](#) so that you can watch the meeting online should you wish to do so.

**If you would like to register for a public speaking slot, you should contact [committee@wiltshire.gov.uk](mailto:committee@wiltshire.gov.uk) for attention of the officer listed on the front of the agenda (not the case officer for the application).**

**The deadline for registration is 10 minutes before the start of the meeting**, however in accordance with the procedure for planning committees, no more than three statements in support or three statements in objection may be made at the meeting for each application. In most cases, the first three people to register would fill those speaking slots. Statements and comments beyond the three in support and three in objection will not be received.

If you require any further information regarding the committee, please do not hesitate to contact Democratic Services at [committee@wiltshire.gov.uk](mailto:committee@wiltshire.gov.uk).

Yours faithfully,  
*Head of Development Management*

## REPORT FOR THE STRATEGIC PLANNING COMMITTEE

<b>Date of Meeting</b>	1 July 2025
<b>Application Number</b>	PL/2024/11426
<b>Site Address</b>	Land to the South of A365 Bath Road and West of Turnpike Garage, Melksham, Wiltshire
<b>Proposal</b>	Construction of warehouse with office space, parking and associated landscaping including site access
<b>Applicant</b>	Gompels Healthcare Ltd
<b>Town / Parish Council</b>	Melksham Without Parish Council
<b>Electoral Division</b>	Bowerhill - Cllr Nick Holder
<b>Grid Ref</b>	51.35716, -2.111517
<b>Type of Application</b>	Outline planning permission: All matters reserved
<b>Case Officer</b>	Russell Brown

### Reason for the application being considered by Committee

This application is brought before the Strategic Planning Committee as it is a large-scale major development of more than 10,000 square metres of non-residential floor space which requires the application to be determined by the Strategic Planning Committee. The divisional ward member (Cllr Nick Holder) also asked a neighbouring division member (Cllr Tamara Reay) to submit a call-in request irrespective of the officer recommendation with the following key issues being identified:

The scale of the development; and  
The visual impact upon the surrounding area

### 1. Purpose of Report

This report considers the relevant planning considerations for the above proposal, including the consultation responses as well as local and national planning policy and guidance. The report identifies the key planning issues and appraises whether this application proposal represents a sustainable form of development having regard to the respective social, environmental and economic dimensions.

### 2. Report Summary

The key planning issues for this application are considered to be:

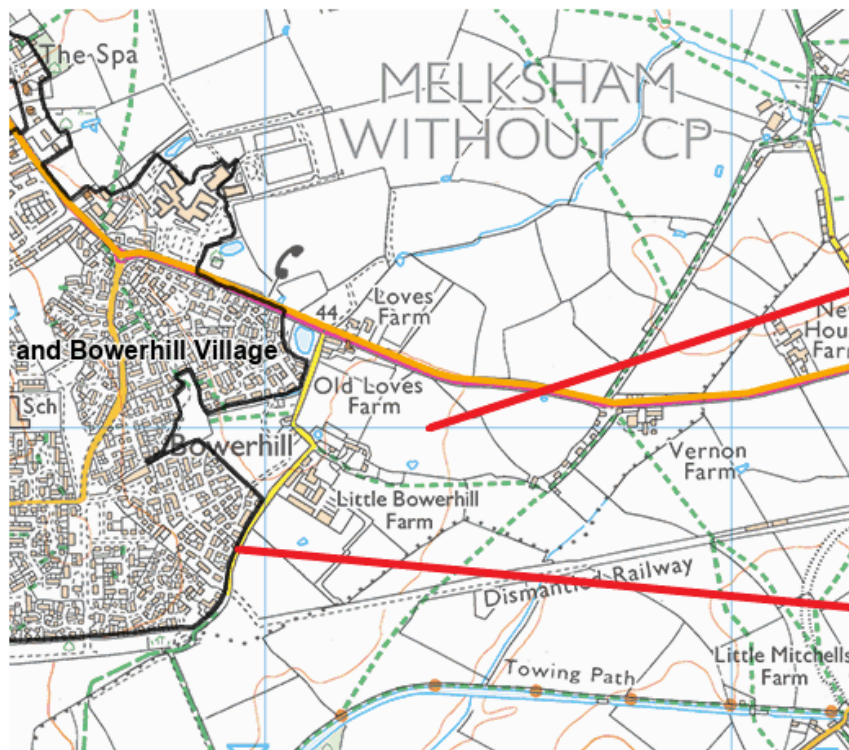
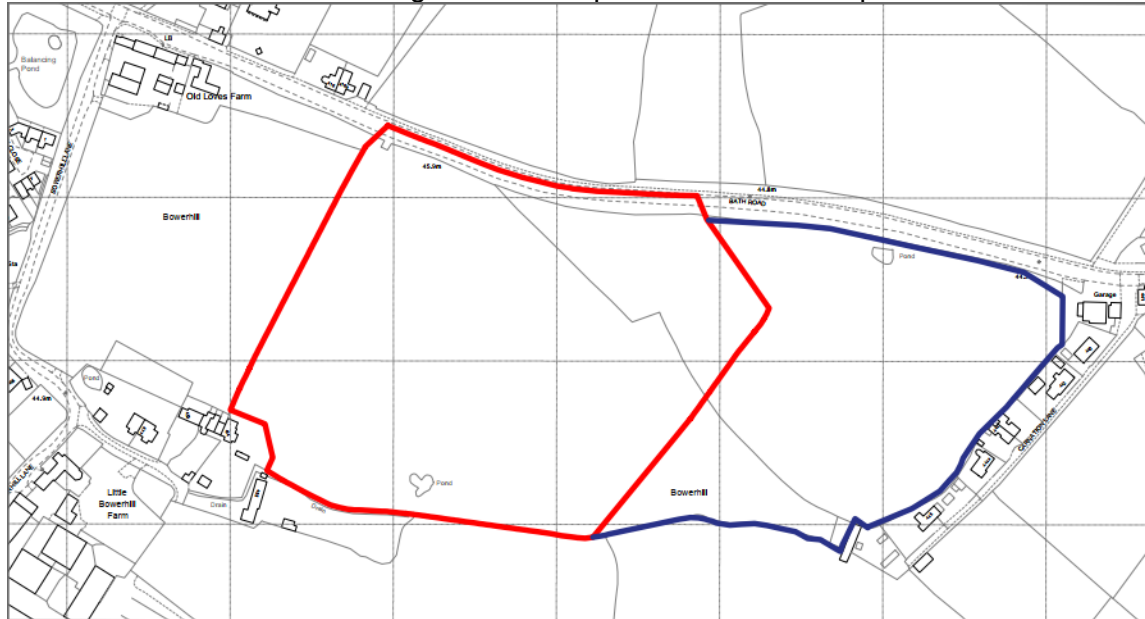
- Principle of development;
- Design, scale and visual impact upon the surrounding area and residential amenity;
- Landscape impacts
- Ecology impacts;
- Heritage impacts;
- Drainage and flooding issues; and
- Highways safety issues

### 3. Site Description

The application site as illustrated on the following page and relates to land to the east of the Bowerhill and Melksham and sits within the open countryside and comprises agricultural land. There are residential neighbouring properties to the immediate south-west and north-west, and at longer distances to the east and west.

There is a Grade II listed building at Old Loves Farm, located to the north-west of the application site and shown in the below insert which is measured as being 95 metres from application site boundary and approximately 110m from the siting of the proposed warehouse.

Fig. 1: Location plan and context map



Application site

Settlement boundary

The above inserts reveal the application (in red), other land owned by the applicant (in blue) and the settlement boundary of Bowerhill village shown by a thick black line (above).



The boundaries of the site are formed by mature trees and hedgerows commensurate with the agricultural land use of the site and its surroundings.

The site is partly included within the Bath and Bradford on Avon Bat Special Area of Conservation (SAC) and is wholly within the amber risk zone for great crested newts. The site is in an area where the flood risk is mapped as being low.

Fig. 2: Aerial view of site and surrounding



#### **4. Relevant Planning History**

There is no material planning history for the application site.

#### **5. The Proposal**

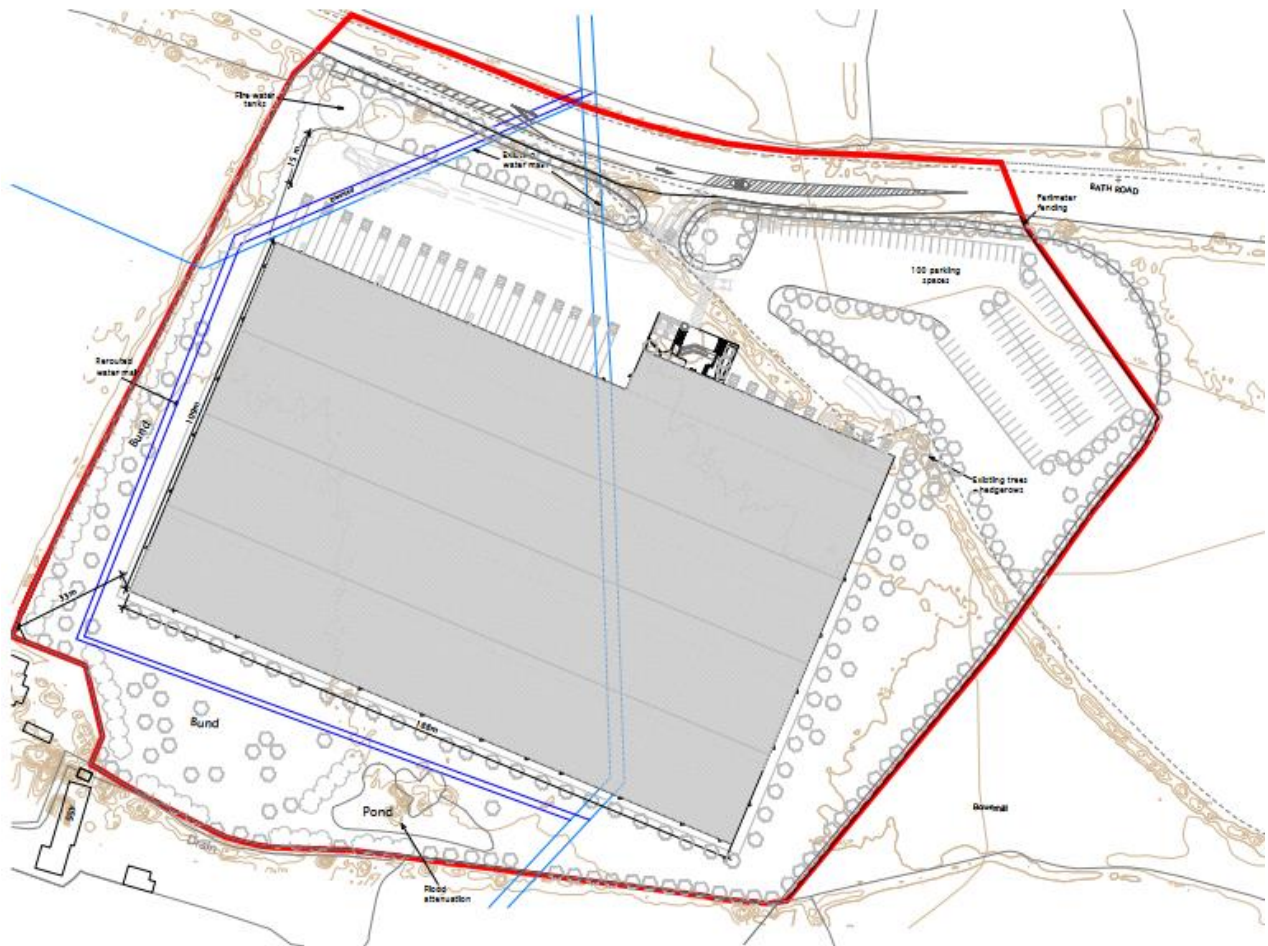
The proposal under this application seeks outline planning permission, with all matters being reserved for a later application pursuant to the proposed construction of a warehouse with office space, parking and associated landscaping including site access.

The proposal would include the following:

- A commercial warehouse, under B8 use, with a floor area of approximately 21,000 square metres.
- The proposed building would be 188m long and between 109m and 121m deep. The building would be 16m high at the eaves, rising to 17.5m at the apexes.

- 100 parking spaces would be provided.
- An external loading area for approximately 20 HGVs.
- Widening the A365 to the north, to facilitate a left-turn lane into the site.
- Removal and replacement of the northern site boundary hedge to allow for a proposed turning lane.
- Flood attenuation pond.
- Diversion of a water main.
- Landscape planting including bunding to the south and west.

Fig. 3: Proposed indicative site plan



All matters are reserved as part of this outline application, however the submission does include some indicative details, including the above site plan, as well as elevational details and floor plans (as set out within Figs. 5 and 6 included on the next couple of pages). The application is also supported by a series of supportive reports relating to transport, ecology, heritage, drainage and landscape.

The site is located outside of the defined settlement limits and is not allocated for employment use in the current Wiltshire Core Strategy (WCS), and the same applies to the emerging local plan.



The proposal would allow for the expansion of the Gompels storage and distribution business currently located within the Bowerhill Principal Employment Area.

The applicant asserts that this application would, if built, create about 100 additional jobs for the Gompels business as the following insert reveals:

Fig 4: The Applicant's Job Creation Projections

A breakdown of existing roles and employment growth is summarised below for Gompels HealthCare:

Role	Current numbers	With new development
Directors and management team	6	12
Procurement and accounting	14	25
Sales, Marketing, Customer services	24	48
Programmers and IT	4	10
Regulatory (H&S, Compliance)	2	7
Warehouse – pickers, supervisors	18	38
Forklift Drivers and other drivers	10	22
Maintenance and cleaning	2	6
New roles	-	12
Total	80	180

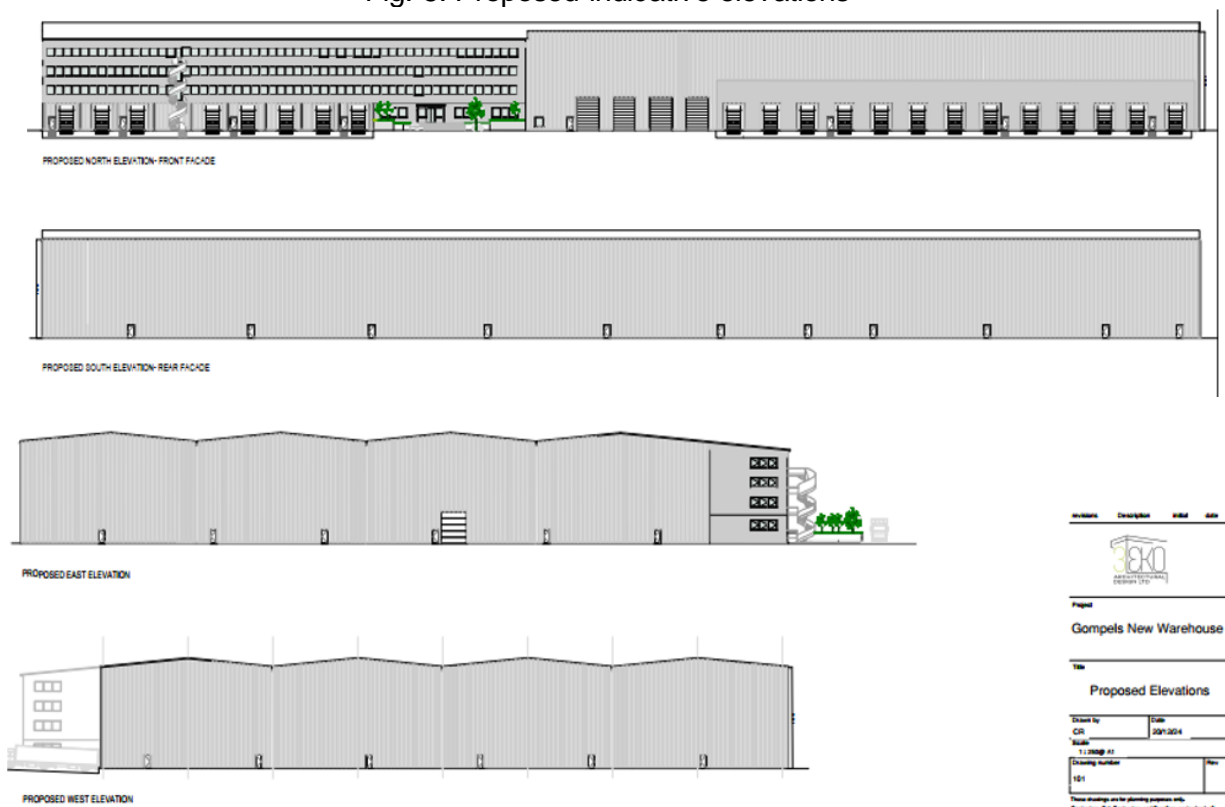
The applicant has also provided a document that shows the level of total jobs that could be created as a result of this application being between 275 – 547 (based on a “trickle down” assessment and assumption that other local businesses could expand to take over the existing Gompels building).

The job creation numbers quoted above have not been verified by officers and represent what the applicant argues may happen.

The site would be accessed from a proposed new entrance from the A365 to the north.

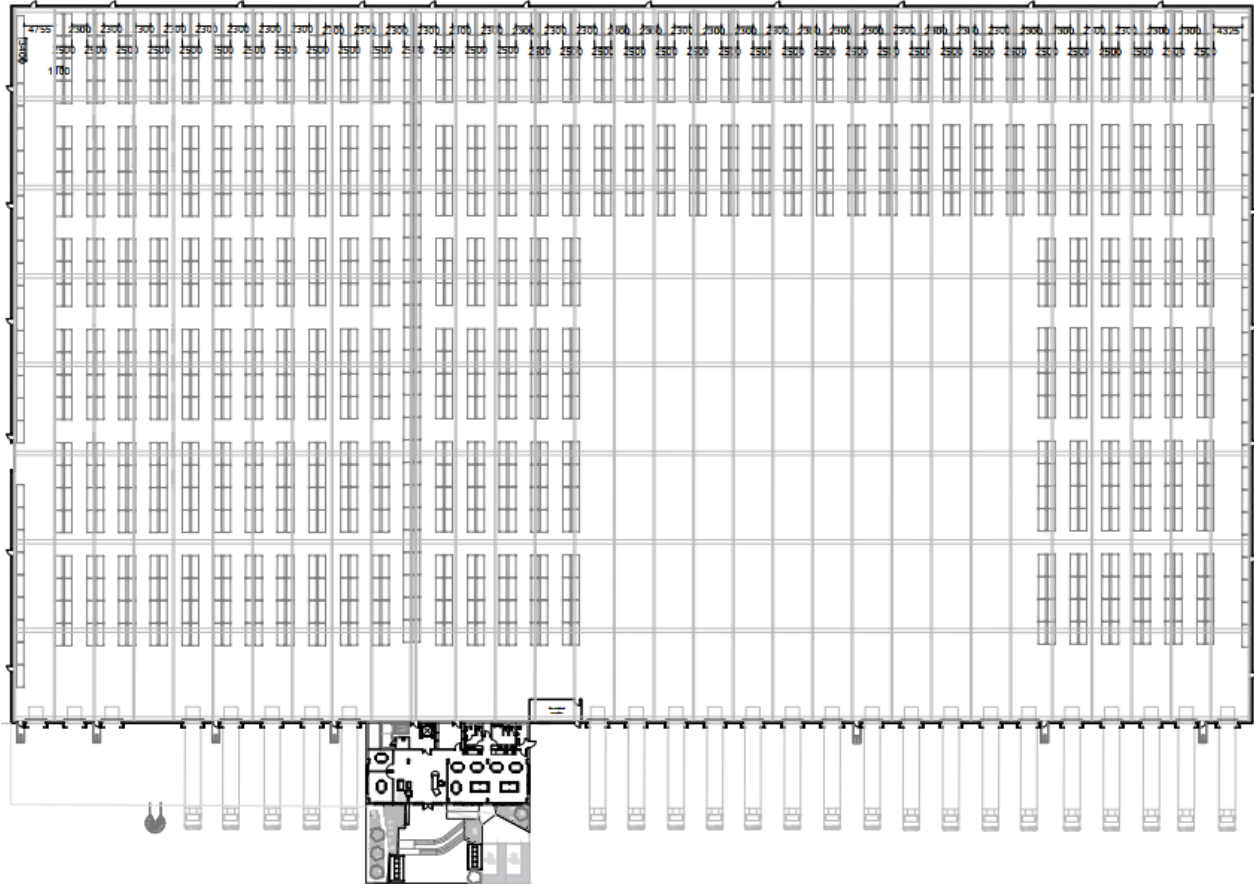
The proposed warehouse would operate between the hours of 7am and 7pm (Monday to Friday).

Fig. 5: Proposed indicative elevations



The proposed ground floor plan (Fig. 6) shows the extent of the warehousing, and as with the existing premises, there would be offices on the upper floors.

Fig. 6: Proposed indicative ground floor plan



## 6. Planning Policy

### National Planning Policy Framework (NPPF, The Framework)

The adopted Wiltshire Core Strategy (WCS) 2015 - Relevant policies include: Core Policy 1: Settlement Strategy; Core Policy 2: Delivery Strategy; Core Policy 3: Infrastructure Requirements; Core Policy 15: Spatial Strategy Melksham Community Area; Core Policy 34: Additional Employment Land; Core Policy 41: Sustainable Construction and Low Carbon Energy; Core Policy 50: Biodiversity and Geodiversity; Core Policy 51: Landscape; Core Policy 57: Ensuring High Quality Design and Place Shaping; Core Policy 58: Historic Environment; Core Policy 60: Sustainable Transport; Core Policy 61: Transport and New Development; Core Policy 62: Development Impacts on the Transport Network; Core Policy 64: Demand Management; Core Policy 67: Flood Risk; Core Policy 68: Water Resources

### West Wiltshire District Local Plan (1st Alteration) - saved policies U1a Foul Water Disposal

#### Other Material Considerations

Planning Practice Guidance (PPG)

Wiltshire Council's Design Guide

Wiltshire's Local Transport Plan 2011- 2026

Wiltshire's Community Infrastructure Levy – Planning Obligations Supplementary Planning Document (Planning Obligations SPD)  
Wiltshire's Community Infrastructure Levy - Charging Schedule (Charging Schedule)  
Wiltshire's Community Infrastructure Levy - Regulation 123 List (123 List)  
Strategic Housing and Economic Land Availability Assessment (SHELAA)

Joint Melksham Neighbourhood Plan 2020-2026 (Made July 2021)

### Emerging documents

Wiltshire Council's Emerging Local Plan (for the period of 2020-2038) has reached examination stage and the first hearing will take place on June 24 to consider the duty to cooperate. The Emerging joint Melksham neighbourhood plan to be known as the Joint Melksham Neighbourhood Plan 2 (for the period of 2020-2038) is currently subject to an independent examination whereby the appointed inspector has confirmed his satisfaction on the following:

- *the policies relate to the development and use of land for a designated neighbourhood plan area; and*
- *the Plan meets the requirements of Section 38B of the Planning and Compulsory Purchase Act 2004 (the Plan must specify the period to which it has effect, must not include provision about development that is excluded development, and must not relate to more than one neighbourhood area); and*
- *the Plan has been prepared for an area that has been designated under Section 61G of the Localism Act and has been developed and submitted for examination by a qualifying body.*

## **7. Summary of Consultation Responses**

**Melksham Without Parish Council:** Melksham Without Parish Council recognises and respects the conflict and dilemma between the need for additional employment land and the loss of a greenfield site, its proximity to a heritage asset and the potential to impact the residential amenity and landscape. It is unfortunate that no other suitable employment land in Melksham has been found to accommodate the application proposals; or been allocated in the emerging Local Plan.

The parish council unanimously resolved on balance, to have no objection to this application but does have serious concerns about some aspects and therefore request planning conditions/mitigation measures be secured should the application be supported as detailed below.

Melksham Without Parish Council believes that the application meets the requirements for Additional Employment Land policies in Core Strategy (Core Policy 34) and the emerging Local Plan (Policy 64).

### **From the adopted Core Strategy Policy 34:**

***“Proposals for employment development (use classes B1, B2 or B8)... Outside the Principal Settlements, Market Towns and Local Service Centres, developments will be supported that:***

- are adjacent to these settlements and seek to retain or expand businesses currently located within or adjacent to the settlements”...“and are supported by evidence that they are required to benefit the local economic and social needs”***

### **From the emerging Local Plan Policy 64**

***“Proposals for employment development (within use classes B2, B8 or E(g)(iii)) will be supported on unallocated sites within or adjacent to Principal Settlements, Market Towns, Local Services Centres and Large and Small Villages where they are appropriate to the role and function of the settlement.”***

***“and would not undermine the delivery of strategic employment allocations”.***

The made Joint Melksham Neighbourhood Plan 1 and Emerging NHP2 Policy 10: Employment Sites is covered by NHP1 4.11.2 & NHP2 4.10.2:

***“The level of out commuting to neighbouring towns and jobs along the M4 corridor is high, and community engagement confirms that people want to work closer to their homes. Expansion of new employment opportunities with the Plan area is considered desirable to reduce the amount of out commuting to deliver sustainable travel movements.”***

The parish council are very keen to safeguard existing employment and provide space for the expansion of jobs in the Melksham and Bowerhill area. With the Local Plan and emerging Melksham Neighbourhood Plan 2 housing site allocations, current planning applications for large housing developments and the changing landscape in light of the recent NPPF update, they feel strongly that Melksham should not develop any further as a dormitory town; jobs must be provided for the residents who currently live in the town and parish, and for those moving into the new houses in the future. Out commuting contributes to more car travel, congestion, and pollution, and takes money away from the Melksham community for local spend in shops and cafes. The parish council want to see Melksham, and its local economy, thrive.

The parish council have previously expressed their concerns at the lack of Employment Land allocated in the emerging Local Plan. Only 5 Hectares for industrial use is allocated, with 2 Hectares of that allocation already approved with a change of use to “Office and Research & Development” on the Blackmore Farm development (Local Plan Policy 18, Planning Application PL/2023/11188).

The “Planning for Melksham” September 2023 supporting document for the emerging Local Plan at paragraph 19 states *“The findings of an Employment Land Review has stated that businesses and agents report significant demand for expansion space in the area against a shortage of available sites and premises. This review has recommended that new employment sites are allocated to ensure there is a sufficient supply of employment land to meet forecast demand over the Local Plan Period”*. The Place Shaping Priorities “PSP2 Reducing Out commuting” states *“Reducing out-commuting through and improved employment offer, including delivery of new employment land to allow existing businesses to expand and to attract inward investment”*.

These statements are reflected in “Policy 17 Melksham Market Town” in the emerging Local Plan.

This planning application gives the retention and expansion for future jobs at Gompels and free up their existing premises for the retention and expansion of jobs at Knorr Bremse, who are adjacent to the current Gompels site. The parish council note the letter of intent provided in the “Planning, Design & Access statement” dated April 2022, but would like to see more recent evidence of this and suggest a draft Heads of Terms for Knorr Bremse moving into the vacated existing Gompels building.

The proposed building is large. On balance, the parish council feel that the need for retention and expansion of jobs outweighs the point in CP34 & LP64 relating to “harm to the residential amenity” but request mitigation on the following aspects.

### **Residential amenity/landscape/historic environment**

CP34 requires new development to be “*consistent in scale with their location, do not adversely affect nearby buildings and the surrounding area or detract from residential amenity*”.

Emerging Local Plan Policy 64 (LP64) as currently drafted seeks new development to be “*appropriate in scale with their location, do not adversely affect the operation of nearby uses or unacceptably harm residential amenity*”.

LP64 also seeks to avoid “*unacceptable harm to landscape character or visual intrusion*” ...and “*unacceptable impacts on the historic environment*”.

1. Planting/Screening: the application proposes new tree planting being mature in 15 years' time; the parish council requests that mature, large specimens are planted to give more coverage, in a quicker time.
2. Design: the building is a functional warehouse, and thought is to be given to the design of the building to make it more architecturally interesting and appealing.
3. Colour scheme: the parish council request the use of graduated colour on the building to make it less “jarring” on the landscape; for example, the graduated colour on the Great Bear Distribution building for Cereal Partners on the A350, located on the other side of the Bowerhill industrial estate.
4. Lighting: External building lighting to not be obtrusive, use of downlighting, and not to impact on the residents and wildlife.

### **Highways/Footpaths**

LP64 as drafted would seek new development to avoid “*unacceptable impacts on the local transport network*” which made Melksham NHP1 & Emerging NHP2: Policy 11 Sustainable Transport and Active Travel refers.

The parish council recognises that the site would be accessed via a ghost lane, rather than a roundabout, as per several other applications for major development in the parish at present. The lane must be long enough to allow for waiting vehicles to turn right and include sufficient width to allow vehicles to pass on either side of waiting vehicles.

There is an emerging Local Plan site allocation at Bath Road, adjacent to (MOCS) Melksham Oak Community School (Policy 19) for 135 dwellings which would require a new access (possibly a roundabout) onto the A365 at this stretch, as well as the long-held belief of the parish council that the entrance to MOCS is currently inadequate and should be a roundabout. The proposed route of the potential A350 Eastern Bypass would be located to the east of this planning application site, which would have another roundabout. Wiltshire Council's highway officers are asked to take all these access points into account and review a holistic approach to this stretch of road and not just look at this planning application's site access in isolation.

It is noted that the A365 at the proposed site entrance is an HGV advisory route, with HGV traffic encouraged to use the A365 rather than travel through Seend and the A361.

The parish council request an upgrade to the existing footpath surface and a safe pedestrian crossing for those employees walking to work.

### **Sustainable Design & Construction & EV Charging**

**WCS CP34 seeks new development to “*meet sustainable development objectives*”.**

Similarly, the made Joint Melksham NP1 and emerging NHP2: Policy 1 Sustainable Design & Construction refer.

**Made Joint Melksham NP1: Policy 4 refers to Ultra-low emission vehicle charging and “*proposals for new employment, leisure or retail developments are also encouraged to make provision for charging facilities for staff and/or other users.*”**

**Emerging Joint Melksham NHP2 Policy 4 covers ultra-low emission vehicle charging and states that “*Technology for charging low emission vehicles, such as electric vehicle infrastructure, will be required for all development proposals in accordance with national or Wiltshire Council standards as relevant*”.**

Whilst the application incorporates solar panels, air source heat pumps etc and an excellent BREEAM rating at pre-assessment, which are welcomed, there is no mention of EV charging points, and the parish council would like to see these provided. This would not only lead to decarbonising road transport, but more use of electric vehicles would mean quieter traffic.

Care needs to be taken with the siting of the solar panels to ensure there is not a large reflective surface when the building is viewed from further away, from Seend/Seend Cleeve.

#### **Other points raised at the public parish council meeting**

Members recognised and respected the many points raised by the residents of Bowerhill Lane and Bath Road and the wider Bowerhill and Seend areas who attended the meeting but felt that points raised were not material planning considerations. For example, concerns of loss of view, or reduced property values. Likewise, there were suggestions for Gompels to look at other sites, to swap their land with the parish council's sports field, to work night shifts at their existing site, or to take less orders and not expand as a business, but the parish council were only able to consider the current planning application in front of them and the material planning considerations.

The parish council also noted that the site was looked at previously by the Council and registered as “SHELAA (The Strategic Housing and Economic Land Availability Assessment) 3331 Land South of Bath Road (A365) West of Carnation Lane” in the Local Plan review (September 2023) as part of “Site 4: Land to the east of Bowerhill” and was considered the joint 6th most sustainable site (out of 19 sites reviewed by the Council's strategic planning team), but was not allocated in the Local Plan.

The parish council welcomed the additional information provided during the application process, but having considered the new information, the PC saw no reason to change their view on having no objection (with the previous caveats remaining).

**Melksham Town Council (MTC):** Melksham Town Council acknowledges that this development falls within the boundary of Melksham Without Parish Council, but the outcome of the application would affect the town as well. The consultee comments made by Melksham Without Parish Council are fully endorsed. Concerns were expressed about the location of the proposed warehouse and vehicle access to the site.

The Town Council are sympathetic to the views and concerns of residents but ultimately felt that

the employment benefits were paramount and on that basis the Town Council voted not to object to the application. However, if the application is to be granted, Melksham Town Council requests that planning conditions are imposed to mitigate the effect on local residents, as suggested below.

Planting/Screening – MTC would like to see larger, more mature trees planted at an early stage, to provide some immediate cover and give full coverage in a shorter time period.

Design – MTC would like to see more architectural appeal in the design, rather than a basic functional warehouse.

Colour – MTC would like to see graduated colouring on the warehouse to help it blend into the landscape and make it less jarring to residents.

Lighting – MTC is concerned about intrusiveness of external lighting for residents and the adverse effect of external lighting on wildlife. MTC requests that any external lighting be mitigated downlighting.

As well as any other mitigating conditions that are considered suitable in addition to the above.

**Seend Parish Council:** During the Council's meeting on 28th January 2025, more than 20 local residents attended and raised concerns about this application, three residents were invited to speak on their behalf.

The concerns included:

- The height and scale of the proposed building
- Possible impact on Septic Tanks if the water table rose
- Wildlife impact
- Impact on the current view enjoyed by Local Residents
- The detrimental effect on adjacent property values
- Increase in traffic passing the adjacent school

It was however conceded there is a recognised need for local employment opportunities but there were questions whether there were more suitable locations nearby and that some would prefer the land to remain undeveloped agricultural land.

At the PC meeting, the applicant responded to these concerns explaining they had completed a full landscape impact assessment with a plan to screen the warehouse with tall trees and hedging. In addition, provision would be made to increase biodiversity and provide the necessary drainage to ensure the existing water table does not rise and may actually be slightly lower.

Councillors shared some of the concerns raised and noted that this is a very difficult planning decision to make. Given time, it is believed that although the building could be screened, it is very high and perhaps a compromise could be found by lowering the overall height of the building by covering a larger land area. The Parish Council's understanding is that the applicant has looked at more than 20 sites.

There was a suggestion made regarding potentially redeveloping the recreational land adjacent to Gompels present site and be exchanged for Gompels land.

Wiltshire Council appears not to have fully understood the Company's plight. Gompels has been a



local success and is a growing company. All of their employees are directly employed, and they have been supportive of their local staff.

Without Wiltshire Council's support the company may be forced into a position that could ultimately become a choice between jobs or housing. It is a decision the applicant did not want and one the Parish Council feels would have been unnecessary had Wiltshire Council fully considered the long-term needs of its locally based medium sized enterprises.

This situation has a wider impact as it calls into question the value of local Neighbourhood Plans as it is possible they could be over-ruled. Guidance on the creation of future Neighbourhood Plans may need to be revised to include adequate provision of 'Employment' land so that people have the opportunity to live and work within the same community area without having to travel.

**Wiltshire Council Highways Authority:** No objection, subject to conditions and subsequent reserved matters application, along with a s278 agreement.

The Highways officer raises concerns over the detail included within the application, whilst acknowledging that the application is in Outline with all matters reserved.

There are some conflicts within the submitted plans, but these are shown as indicative and not set as a detailed matter at this stage. The works to the highway would require a s278 agreement. It is pointed out that the Indicative Preliminary Junction Layout shows area of embankment support to the south of the widened carriageway which conflicts with the proposed parking arrangements within the site.

The pedestrian links to the site would need to be upgraded and there may be pressure to create a shared use path for pedestrians and cyclists.

Nevertheless, the highways officer does not object to the outline proposal and considers that there is enough space within the highway land and application site to create a safe access.

**Wiltshire Council Drainage Authority:** Objects

While it is noted this is an outline application, the drainage authority is not satisfied that the applicant has demonstrated the surface and foul water drainage strategy would be feasible based on the current information provided.

Further information was provided by the applicant that has not resolved all of the technical objections.

There remains a concern that there is no source control SuDS, which would cause unrestricted flows through the swale until the final discharge control device at the connection into the watercourse. The applicant has not demonstrated that this would be managed appropriately.

The applicant has also failed to satisfy the drainage authority that the proposal would have a strategy to deal with various flooding events.

**Wiltshire Council Conservation Officer:** Objects.

**Key Issue – the effect of the development on a designated heritage asset, a grade II listed farmhouse and historic farmstead at 'Old Loves Farm'.**

**Relevant Legislative / Policy Position:**

- Section 66 of the Planning (Listed Building and Conservation Areas) Act 1990 – requirement to have special regard to the desirability of preserving or enhancing the building or its setting or any features of special architectural or historic interest which it possesses.
- The National Planning Policy Framework (2024) outlines government policy, including the historic environment (Section 16). National Planning Policy Guidance provides guidance on making changes to Heritage Assets.
- Wiltshire Council's Core Strategy Policy CP57 'Ensuring high quality design and place shaping': A high standard of design is required in all new developments, including extensions, alterations, and changes of use of existing buildings. Development is expected to create a strong sense of place through drawing on the local context and being complementary to the locality.
- Wiltshire Council's Core Strategy Policy CP58 'Ensuring the conservation of the historic environment' requires that "designated heritage assets and their settings will be conserved, and where appropriate enhanced, in a manner appropriate to their significance."

**Issues:**

- Impact upon the preservation of the listed building and/or its setting or any features of special architectural and/or historic interest.

**Assessment:**

The farm is a good intact example of a traditional farmhouse and farmstead, of national importance, and whilst some of the farm buildings have been converted to residential use, the overall character of the site and its relationship with its rural surroundings has been preserved. Farmsteads have a fundamental relationship with their surrounding hinterland, which contributes to its understanding and special interest. Wide open spaces and field systems contribute to the immediate and wider setting of historic farmsteads such as this.

The proposed warehouse would be a vast building, built up close to the boundary of the site and would have a visual impact on the setting of the designated heritage asset at Old Loves Farm, causing harm, justifying a conservation-based objection with the proposals being considered contrary to current national and local policies that seek to preserve or enhance the historic environment.

**Revised comments:**

Following the submission of additional information by the applicant, including a heritage statement and proposed mitigation measures, the following updated conservation-based comments were provided.

Whilst it is accepted to a point that the early 21st century residential development to the west has eroded the setting of the designated heritage assets, the historic rural lane ('Bowerhill Lane') has been an historic physical and visual separation of the farm site from the land to the west. Whilst each application is assessed on its own merits, and therefore the presence of development to the west sets no precedent for this proposed development, the type and scale of the housing development is quite different to the proposed warehouse.

The fact that there is development to the west does, and should, not automatically mean that further erosion of the wider setting of the listed farmhouse is acceptable. The additional erosion of the rural character of the setting would have a negative cumulative impact and therefore would fail to

preserve or enhance the setting of Old Loves Farm, which is contrary to the NPPF and Core Strategy.

It is noted that additional mitigation measures in the form of planting have now been proposed, and whilst the principle of providing improved greenery and bunding is generally positive, it does not take away from the fact that mitigation measures are required to reduce the visual impact on the character of the rural setting. These measures acknowledge that there would be a visual impact on the wider rural setting, which is harmful to the point that mitigation is required.

The additional information is appreciated, however the conclusions set out within the heritage statement are not agreed with, and the degree of visual harm to the setting of the listed farmhouse is substantive grounds to maintain an objection. Accepting that some harm has occurred in the past should not be a reason to allow further harm within this sensitive setting. Other suitable sites for industrial buildings should be explored that will not result in harm to heritage assets.

**Wiltshire Council Public Protection:** Objects

There are existing residential properties in close proximity. With regard to noise and the effects on the amenity for all the residential receptors, a noise assessment is required which should consider factors such as background noise and hours of working. Following the submission of such an assessment, planning conditions may be necessary regarding noise mitigation or to restrict hours of work/deliveries, but a baseline understanding is required.

**The development should be designed so as to achieve a rating level of 5dB (LAeq) below the typical background (LA90) level at the nearest noise sensitive location.**

Where this criterion cannot be achieved, the various noise control measures considered as part of the assessment should be fully explained (i.e. relocation of noise sources, use of quieter equipment, enclosures, screening, restriction of the hours of operation) and the achievable noise level should be identified. This information would allow a judgement to be made concerning the application and its likely impact on the surrounding area. In addition to the above, maximum noise levels should also be adequately controlled.

Deliveries and collections are usually controlled by restricting operational hours but depending on the extent of these activities, a Noise Management Plan (NMP) may be necessary, which would include an assessment of noise. This would usually involve assessing the noise upon arrival, loading/unloading period and then departure.

The NMP may also need to include controls such as acoustically sealed delivery bays, and restrictions on vehicle mounted refrigeration units, audible alarm systems or white noise reversing beepers. Where applicable, the noise assessment will take account of multiple noise sources operating simultaneously and report the cumulative impact.

**Wiltshire Council Ecologist:** Objects.

**Further Information Required:**

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date)
1	Impacts on protected and notable species.	CP50, NPPF, Conservation of Habitats and Species Regulations 2017 (as amended), Wildlife and Countryside Act 1981 (as amended).	Ecological Impact Assessment to include (but not exclusively) detailed survey for protected and notable species bats (foraging and commuting including LHB), dormice, great crested newts, birds and reptiles. Assessment of impacts on lesser horseshoe bats.	
2	Protection of features of nature conservation value including local biodiversity resource and ecological networks.	CP50, NPPF	Ecological Parameters Plan	
3	Biodiversity Net Gain	Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021)	A completed <u>statutory</u> metric calculation confirming the baseline and predicted post-development biodiversity units of Site (including the condition assessment sheets (if applicable) and maps.	

An ecological assessment has been submitted in support of this application however this contains insufficient information to determine potential impacts on the following protected sites, habitats and protected/ notable species: Bath and Bradford on Avon Bat SAC, hedgerows (priority habitat), hedgerows (priority habitat), bats (foraging and commuting including LHB), dormice, great crested newts, birds and reptiles.

In carrying out its statutory function, the LPA must be reasonably sure that the proposal will not result in significant adverse effects on protected habitats or species.

Under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) this application is required to deliver 10% Biodiversity Net Gain (BNG). The Biodiversity Gain Plan condition will automatically apply if approval is forthcoming. Information required by the Article 7 of The Town and Country Planning (Development Management Procedure) (England) Order 2015 has not been submitted.

The site extends to approximately 5.6 hectares that is not covered by any statutory or non-statutory nature conservation designation. The southern boundary of the site does however lie within a lesser horseshoe bat LHS Core Roost Buffer for a maternity roost located at Seend Head Mill and as such impacts on the Bath and Bradford on Avon bat Special Area of Conservation must be fully considered.

Based on walk over surveys carried out in 2022 and 2024 the site is reported to be predominantly arable land bound with hedgerows, with one hedgerow cutting across the site from North-West to

South-East. The hedgerows would be considered habitat of conservation importance (i.e. Priority Habitat) and are considered to be ecologically important.

Detailed surveys for protected and notable species as recommended by the applicant's own submitted ecology reports have not been completed however preliminary results indicate that the hedges may support protected and notable species bats (foraging and commuting), dormice, great crested newts, birds and reptiles.

To avoid impacts on features of nature conservation value, including ecological networks and protected and notable species the hedges would need to be retained and buffered from the development (including artificial light spill).

The submitted site plan shows the proposed development encroaching on hedgerow that would result in significant loss and fragmentation of this habitat.

Detailed survey for the following species is recommended in the submitted reports, but these have not been completed:

bats (foraging and commuting), dormice, great crested newts, and reptiles.

It is also noted that the assessment does not consider farmland birds.

As recommended by the applicants own surveys, the application must be supported by an Ecological Impact Assessment predicated on completed surveys.

### **Ecological Parameters Plan (EPP)**

An Ecological Parameters Plan (EPP) is required. The EPP must clearly identify those areas of the site which are unconstrained, those areas where sensitive design or restrictions may be required, and any areas of the site which are to be retained, remain undeveloped, enhanced, form part of the landscaping for the purposes of protecting and enhancing biodiversity and any areas to be used as compensatory habitat in line with the submitted ecology documents, including the Biodiversity Net Gain Calculator spreadsheet. The EPP would become an 'approved document' of any outline permission granted and any future reserved matters application would need to be designed and planned to be in compliance with the EPP.

The EPP must include:

1. A scaled drawing showing existing ecological features, distinguishing between those to be retained and those which will be lost e.g. hedgerows, trees, water features, badger setts etc
2. Specify the minimum distance from each feature to the footprint of development e.g. to curtilage of properties, car parks, roads.
3. Specify the buffer distance from light sensitive ecological features where the increase in lux levels will be zero or, if lux contours have been modelled, show contour lines for 1, 0.5 or 0.1 lux depending on the sensitivity of ecological features
4. Identify where new habitats will be created on site, include minimum area in hectares or length in metres and habitat type
5. Identify areas where habitat enhancement will be undertaken, include minimum area in hectares or length in metres and habitat type, e.g. defunct hedgerow to be grubbed up and replanted
6. Provide stand-off distances to the footprint of development e.g. curtilage to properties, car parks, roads for each tree to be retained, sufficient to ensure the tree will survive throughout the operational phase without risk of it being removed for health and safety, loss of amenity or liability reasons.

## **Habitat Regulations Assessment (HRA) – Bath and Bradford on Avon Bat SAC**

The application site is partially located within a consultation zone for bats associated with the Bath & Bradford on Avon Bats Special Area of Conservation (SAC) and therefore the proposed development has the potential to result in significant adverse impact on the special features of that site.

**Insufficient information has so far been submitted to undertake the HRA, which must be completed and the conclusion agreed with Natural England prior to the application being determined.**

### **Biodiversity Net Gain**

This application was submitted after Biodiversity Net Gain (BNG) becoming mandatory however the requisite information required for applications subject to the biodiversity gain condition has not been submitted. Under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) this application is required to deliver 10% Biodiversity Net Gain (BNG).

Applications subject to the biodiversity gain condition must be accompanied by minimum information set out in Article 7 of The Town and Country Planning (Development Management Procedure) (England) Order 2015, which includes:

- the completed statutory metric calculation tool showing the calculations of the predevelopment biodiversity value of the onsite habitat on the date of application (or proposed earlier date) including the publication date of the biodiversity metric used to calculate that value.
- a description of any irreplaceable habitat (as set out in column 1 of the Schedule to the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024) on the land to which the application relates, that exists on the date of application, (or an earlier date); and
- plan(s), drawn to an identified scale and showing the direction of North, showing onsite habitat existing on the date of application (or earlier proposed date), including any irreplaceable habitat (if applicable).

Note: the above is only a summary. The applicant should refer to Paragraph: 011 Biodiversity net gain - GOV.UK for full details.

If the applicant considers that the development would not be subject to the biodiversity gain condition, Schedule 7A of the Town and Country Planning Act 1990 the applicant should provide a statement setting out the reasons why they believe this is the case. The submission of a completed metric calculation tool is also considered necessary to evidence any such statement.

**Wiltshire Council Rights of Way:** A Public Footpath MELW35 is located in the field to the south of this proposed development. If the diversion of the A350 goes ahead and the route of the A350 is to be located to the east of this development, it is likely that MELW35 would need to be diverted over the A350. If possible, it would be advantageous to have a public bridleway dedicated within the area of planting which would run between the new road and the proposed building. This would allow for a connection to the north without the need to cross the new road. It would also help improve the connectivity of the bridleway network to include the potential linkage with public bridleway SEEN13 to the south-west of the site.

### **Wiltshire Council Landscape Officer:** Objects

This application follows a pre-app enquiry (ENQ/2022/00548) which focused on the site and the surrounding landscape character – which is referenced as Landscape Character Type 12B.

The site is isolated from the main industrial estate located to the west of Bowerhill and is thus potentially out of scale to the landscape character and context. The LCA states under broad management objectives to *'Consider screening views to intrusive urban edges through planting new woodland.'*

It is noted that the applicant's submitted masterplan has included considerable tree planting to the South, East and Western boundaries of the site although more could be done to strengthen the Northern boundary. The building would be approximately 17.5m high at the ridgeline and would be considerably taller than any of the nearby development, making it a visual outlier. There is a 146m gap between the site and the settlement boundary of Bowerhill, whilst the nearest similar sized industrial / warehouse buildings at Bowerhill Industrial Estate are over 1km to the west.

Set against this is the onward eastern expansion of Melksham to the north of the site with substantial housing development either approved or in the planning stage creating a long-term urban extension to Melksham that this development could add to cumulatively. There is also the future delivery of a Melksham Bypass to consider that could potentially pass the eastern boundary of the site. Whilst the bypass has been out to public consultation there is no formal planning application submitted, so it cannot be relied upon from a landscape perspective that this major infrastructure project would be implemented at the location envisaged, and if at all. At this stage, the consulted upon bypass cannot be used as defining a future settlement 'edge' for an expanded Melksham.

The eastern expansion of Melksham on land to the north of this site is low rise housing development and primarily residential in nature which would again make this scheme an outlier even if the eastern edge of Melksham was fully built out. The development therefore has to be able to stand on its own merits without relying on other development to either weaken the surrounding rural character of the landscape so that the scheme can be deemed acceptable or help to filter views.

The substantial economic benefit to the local economy that the expansion of this local business would generate are fully appreciated (as set out in the applicant's Design and Access Statement (DAS)), but this needs to be weighed up alongside the harm the proposed development would have to landscape character by virtue of the large scale warehouse being proposed on an isolated greenfield site in the rural countryside contrary to Core Policy 51 and NPPF (2024) para 187 (b) *'...recognising the intrinsic character and beauty of the countryside...'*

The DAS suggests using a horizontal pallet of matt coloured cladding to match into the landscape setting in order to reduce the visual impact of the building. This would certainly help to reduce the buildings impact, but a fuller understanding of the colour scheme to be used based on an analysis of the local landscape would be helpful. Currently the DAS gives some examples from a bright blue to shades of green. It would be helpful to know what the applicants design team considers most suitable for the Avon Open Clay Vale character Type.

This form of 'camouflage cladding' would however impact more on long distance views rather than close up views where a colour scheme would not hide the bulk of the building. It is also noted that whilst the examples given in the DAS indicate the use of horizontal cladding, the submitted sketch plan elevations show vertical cladding for the main warehouse building which would not work with the proposed coloured cladding system.

After reviewing the applicant's masterplan, two large fire water tanks have appeared on the front of the development since the pre-app scheme was submitted. These are potentially unsightly and

could be located away from the boundary to reduce their visual impact and allow the north boundary landscape to be strengthened. No information has been given on their height / colour and these characteristics along with their location are likely to be detrimental to the impact of the scheme on the surrounding landscape context.

The footpath and front entrance layout do not match the swept pathed analysis submission contained in the transport report. The landscape layout plan needs to be updated to the latest scheme as this would have the benefit of reducing the number of pathways along the northern boundary and thereby increasing the width of landscape screening and bunding.

It would also be useful to know if approaching lorries to the site would be required to wait in front of a security gate before being allowed to enter the site and if there is enough room for this without the longer lorries causing a hazard.

It is also noted that a utility wayleave needs to be relocated in order to accommodate the building, yet its new path leads right across several landscape bunds and is shown with tree planting underneath. Is the utility provider content with trees being planted so close to their diverted infrastructure and if not, does the plan need to be amended to suit their wayleave preferences so that we can have a better understanding on the landscape mitigation.

The proposed car parking would be very close to the site boundary with little potential to provide effective screening. There is also a large area of tarmac to the south of one of the parking areas that does not seem to have any real purpose. A betterment would involve relating the car parking at least 5m away from the site boundaries in order to allow for additional substantial landscape planting with bunding similar to that currently proposed to the east of the current fire water tank location. This would provide a better landscaped edge and would not rely upon any future planting associated with a bypass roundabout – which appears to be something the applicant is indicating on the masterplan.

As noted above any proposed scheme must be able to show that it can manage the impact on the current landscape without relying on future landscape mitigation for another development. Whilst it is useful to know that the proposed scheme would not directly conflict with a potential future bypass it would be more helpful if the illustrated outline layout drawing was drawn with the A365 based on its current alignment to show how the scheme would work currently with perhaps the bypass arrangement faintly dashed in without any of its potential tree planting being shown because at this stage, there are no planning or landscape certainties with the bypass, and this will remain the case until a formal planning application has been submitted for the bypass.

The proposed wide areas of woodland planting are welcomed in order to try and reduce the visual impact of the building in the landscape although how much of this is achievable due to the utility wayleave diversion is yet to be confirmed, and even with substantial depth of tree planting it could be 15-20 the years before the tree planting reaches a height and maturity that would adequately screen/filter views of the building from local PRoWs which run close to the development to the south and east.

The DAS notes the use of solar panels and roof lights on the roof, but the illustrative outline layout does not show this. It would be useful to understand where solar panels are proposed as glint or glare issues could offset the attempts at reducing the buildings impact at distance with coloured cladding choices.

With respect to sites the applicant has considered prior to submitting this application, the



applicant's own review of sites in the DAS takes no account of potential landscape impacts and thus whilst this site might meet all the technical requirements as stated in the DAS other sites may have been more suitable from a landscape character perspective.

The applicant's submitted Landscape Visual Assessment (LVA) does not provide a plan setting out the viewpoints, so it is difficult to judge exactly where they have been taken from and whether they are representative of the views experienced along the local PRoW network. The viewpoints do not have the site location or extent noted on them which is standard practice when undertaking LVAs / LVIAs in accordance with GLVIA (3rd Edition) guidance. This makes it especially difficult to appreciate the impact on a particular view presented in the LVA.

The submitted LVA states under para 5.4 that the scheme would be set in the context of '*...existing industrial development to the west of Bowerhill is present within outward views from the ridge tops, and therefore the proposed building would not be without precedent.*' However, none of the viewpoint photographs in terms of the close and middle-distance views make this point. As noted previously Bowerhill industrial area is 1km west from this development and despite the proposed architectural detailing and landscape mitigation that this development may offer, it would be seen as an isolated industrial development in the countryside.

All the applicant's submitted VLA viewpoints generally show a largely wooded undeveloped edge to this part of the Melksham and Bowerhill settlement Boundary. Placing a 17.5m high large-scale warehouse would be completely out of context with the landscape character of the Open Clay Vale.

The LVA argues that the proposed Melksham bypass would significantly degrade the landscape to such an extent that would '*fundamentally alter the baseline condition of the site*' (para 4.23). The Melksham bypass has not reached application stage, and the extent of its landscape mitigation is unknown. The applicant's assertion that a future bypass (which may never reach application submission stage or be approved and constructed) should have material weight, is not accepted.

### Conclusion

The applicant's DAS concentrates on the economic importance of securing a site for the expansion of an important local business. The proposal however fails to recognise '*...the intrinsic character and beauty of the countryside...*' as required under NPPF (2024) para 187 (b) or the following parts of Core Policy 51:

- ii. The locally distinctive character of settlements and their landscape settings.***
- iii. The separate identity of settlements and the transition between man-made and natural landscapes at the urban fringe.***

The landscape mitigation proposed by the applicant could be compromised by the need to divert the utility wayleave across the site. And by virtue of the proposed size and scale of the proposed warehouse and its prominent location, there are substantive landscape-based concerns in an area that is characterised by '*level landform with wide open skies and views to ridges and downs*'. The proposed landscape mitigation would take too long to have the desired screening impact and may have a detrimental impact on the openness of the Open Clay Vale landscape character.

The Council's landscape officer refutes the LVA's conclusion that the initial '*significant (adverse - my addition) effects*' on the landscape character would be mitigated by the proposed landscaping due to the overall scale of the building, the poor master planning at the northern boundary, and the utility way leave that would require a considerable area to be kept clear to allow for management

access. The applicant's assertions made with respect to the undefined impacts associated with a future Melksham Bypass scheme are also rejected.

**The scheme fails, by its scale and form, to reflect the landscape character of the site and the surrounding countryside at odds with Core Policy 51 / NPPF (Dec 2024) para 187 (b). Whilst mention is made in the DAS to make use of coloured cladding to reduce the visual impact of the development this has not been followed through in the elevations of the building.**

**The landscape mitigation does not reflect the potential impact of utility wayleaves on the ability to plant screening vegetation along the boundaries of the site.**

**Concerns remain regarding poor master planning and layout of ancillary structures in particular on the northern boundary of the site and the impact on public views into the site and the ability to fully mitigate the sites impact on the surrounding landscape.**

**Concerns around discrepancies between plans (particularly around site entrance layouts shown on different plans)**

**The applicant cannot reasonably rely upon theoretical negative impacts of a potential future development (in particular the proposed Melksham Bypass) devaluing the landscape character.**

#### **Updated Landscape Comments:**

Following the submission of an LVIA (produced by consultants WH Landscape), along with a new site plan, and a SUDS / drainage report, the following landscape-based comments are made:

*The new LVIA still concludes that the development '...can be acceptably integrated into the receiving landscape on the edge of Bowerhill / Melksham.' (para 7.1) and '[o]n balance these effects are considered acceptable in the context of the site's proximity and spatial relationship to the urban edge of Bowerhill and Melksham, which exert an urban fringe influence over the site and its environs. Impacts on these receptors can be partially mitigated by landscape enhancements.'* (para 7.5)

The above is fundamentally disagreed with. The localised built-form character is defined by low rise residential housing and not by large scale warehousing which is found 1km to the west of the application site forming part of the Bowerhill Industrial Estate with a significant number of residential properties in between. This would make this development an outlier in the urban fringe.

The applicant's new LVIA repeats the previous LVA's note on the potential negative impacts of a future Melksham bypass as a reason to allow this development to go ahead (para 7.6). This is not accepted. The Melksham bypass and its potential impacts on Landscape Character are too difficult to quantify at this stage and in the absence of a formal planning application, this current application must be judged on its own merits and compared with the current baseline landscape assessment and known development that is planned for or has approval to date (as well as any application with a Council endorsement to approve, subject to the sealing of a legal agreement).

The concerns raised over the utility wayleave remain. The updated SUDS / flood risk report and revised site plan show the diverted wayleave still running along the western and eastern boundaries of the site right through the proposed landscape mitigation. This is not what is shown on the revised landscape layout. The revised landscape layout suggests the diverted wayleave

would be taken through the road verge and diverted along the verge of the proposed Melksham bypass. This is important conflicting information provided by the applicant/his consultants.

Substantive concerns remain in place regarding the poor master planning and no noticeable changes have been to the layout following the initial Council landscape concerns were logged.

The new SUDS plan would undermine the landscape mitigation that both the new LVIA and previous LVA proposed. Instead of substantial landscape buffer planting to the south, east and west being reinforced with suitable bunds, the SUDS scheme proposes substantial attenuation ponds in these areas with much reduced opportunities to provide bunds or landscape buffer planting.

[Below image extracted from LVIA to illustrate this commentary]:



**Fig. 1 Distribution warehouse at junction of Portal Road/A350.**

The applicants recently submitted LVIA provides an example of the sort of buffer planting being proposed in Fig1 which shows a large warehouse being screened by a substantial landscape buffer of native trees and shrubs along with a large bund. However, having found out where this photograph was taken from, and scaling off the figure, the illustrative bund would be approximately 30m wide and densely planted. Even the proposed planting shown on the WH Landscapes drawing is only 20m wide at its widest point, which is 2/3rds the width of the planting shown in Fig 1 which would mean the bund would have 2/3rds the height.

If the attenuation basins are now added the ability to provide any form of bunding would be virtually removed and the width of planting would be further reduced to perhaps 10m or approximately 1/3rd of that illustratively shown in Fig.1.

Based on the above, Fig 1 gives an inaccurate visualisation of what screening is achievable or even proposed for this application due to the site constraints.

No attempt has been made to address the landscape-based concerns regarding the weak landscape mitigation along the northern boundary of the site and the poor location of the firefighting tanks. Even the amenity space set aside for the workers has been lost to the large attenuation basin down the eastern side of the building.

The landscape plan shows the existing pond to be retained and planted with marginal species, but this does not match the SUDs drawing which incorporates a virtually new 'wet' pond within a new southern attenuation basin. Considering the substantial amount of landscape buffer planting proposed along the southern boundary, serious doubts are held as to whether the marginal planting would successfully establish or instead if this proposed 'ecological feature' might just become over shaded, deoxygenated, and full of leaf litter.

The landscape masterplan and site plan still do not match the transport assessment proposed site access layout and the original queries around footpath layouts and lorry pull-ins and gate locations remain.

### Final Landscape Conclusions

**This development does not sit well with the existing urban fringe (contrary to the LVIA's conclusions), and that the landscape mitigation that has been proposed in order to justify the resultant levels of visual and landscape character impacts caused by the development are fatally undermined by the requirements of the SUDS drainage design.**

### **8. Publicity**

The application was publicised by individually posted notification letters sent to neighbouring properties within close proximity of the application site as well as the display of site notices. As a result of this publicity, many representations have been received:

Approximately 760 representations have been received in support of the application, with approximately 690 of those being submitted as a petition or pre-written letters that were signed.

Approximately 400 representations have been received objecting to the scheme, including some petitions, and some from duplicate addresses.

The third-party comments are available to read in full on the Council's planning portal, and can be summarised as follows:

### **SUPPORTIVE COMMENTS:**

- Gompels is a family run business, there is a longstanding commitment to the area.
- This would create 275 new jobs, which is important given the thousands of new homes being built in the area. Keeping jobs local and supporting growing population.
- This creation of these jobs would reduce the need for out-commuting, cutting traffic congestion and pollution, and creating a better work-life balance.
- As a local business we have struggled to find space to expand in and around the Melksham area. Development of unused land is key in keeping businesses and employment within the area. Failure to develop unused land and build capacity will mean that housing expands at a faster rate than commercial property and a lack of jobs for local people. More development of industrial units is urgently needed. Whilst we understand that warehouses

are maybe not beautiful in the landscape, we are pleased to see the comprehensive screening and non-significant impact at 15 years.

- British businesses should be supported.
- The economic benefits of this project are substantial. By expanding their infrastructure, Gompels will be better positioned to drive growth across the supply chain, fostering stronger relationships with suppliers and creating new business opportunities. The new facility will also contribute to local economic priorities by generating employment and supporting the region's industrial development.
- If this shortage of industrial land is not addressed, businesses like ours, Gompels and many others on the industrial estate face an uncertain future, with the potential for job losses and reduced economic activity in the region. Gompels' proposed warehouse offers a sensible solution to these issues by allowing them to expand their operations and continue to grow in a sustainable way, as well as freeing up their existing site for other local businesses in such desperate need for space.
- a state-of-the-art premises will reinforce Gompels' commitment to sustainability, allowing for eco-friendly practices and energy-efficient operations.
- Government supports economic growth.
- This project aligns with broader community goals for sustainable growth and development.
- Knorr-Bremse is also expanding and would take over the existing Gompels site, creating jobs.
- Gompels Healthcare has demonstrated an exceptional commitment to innovation and collaboration in the technological sphere. Through the provision of warehouse space, operational insights, and knowledge-sharing initiatives, Gompels has enabled the Oxford Robotics Institute to develop, test, and refine cutting-edge robotics systems in real-world environments. These contributions have been instrumental in advancing our understanding of autonomous systems, machine learning in logistics, and robotics deployment at scale - fields that are critical to both regional and global technological progress.
- While some comments suggest the site is a "wildlife haven," it is not designated as a protected habitat or green belt land. Like any field, it has passing wildlife, but it is not an ecologically significant site. The proposal includes substantial tree planting and landscaping improvements, which will enhance biodiversity rather than diminish it.
- For the past 25 years, Gompels has been a key provider of essential pharmacy services to Nutricia, a specialized medical nutrition division of the Danone Group. Our market-leading service in the UK has enabled thousands of individuals to receive nutritional support in the comfort of their homes, rather than in a hospital setting. The strategic partnership with Gompels continues to grow as we develop our service and adapt to NHS reforms. We encourage you to support Gompels in their application for a new warehouse. This expansion will enable them to continue providing vital support to us in the future from their Melksham base as well as contribute further to the local economy.
- Employees of the business are in support of the proposal:
  - Noting that additional commuting time to a different location would put off existing employees due to longer commuting.
  - The business has attempted to secure a new site in numerous locations around Melksham but all to no avail.
  - The local school children would not be in danger.
  - The business produces little pollution.
  - Everyone would prefer land to remain as fields but we all know that cannot always happen.
  - We've outgrown our current space, and this move is essential for the business to expand and continue supplying to care homes and nurseries.

- I understand there are concerns about views being affected for a small number of residents. However, I believe the long-term benefits of securing hundreds of jobs and supporting a thriving local business far outweigh the impact on a handful of individuals.
- The building would only operate Monday to Friday.
- Gompels supports local community clubs and charities.

## **OBJECTIONS:**

- The loss of sun light in the early mornings from a structure that will stand 52 feet high and that will only be a few feet from our boundary and will stretch the entire length of our Garden some 400 feet plus! We will instead focus on the reasons why it should be rejected.
- The field has standing water on it from late Autumn to early Spring that does not drain away.
- We are concerned about the noise levels from the forklift trucks, lorries and vans and air conditioning units etc. And that in time they will move to working a night shift as well.
- This proposal stands in stark contrast to the character and environment of our community and threatens to irreversibly damage the local ecosystem, diminish the quality of life for residents, and endanger the safety of children in local schools which are a few hundred meters away.
- The proposed industrial facility, with its colossal structure standing at 16 meters in eaves, is entirely out of place within our community. Our area is known for its scenic landscapes and tranquil environment, qualities that have drawn many residents, including myself, to purchase properties here. The introduction of such a large-scale industrial operation is not only aesthetically jarring but will lead to a significant increase in noise pollution, thereby eroding the peace.
- The proposed site is outside the settlement boundary, on greenfield land, adjacent to a listed building and a primary school, with limited infrastructure and poor pedestrian/cycle access.
- Object to this proposal on the grounds that this agricultural land is not eligible for industrial development. Therefore, no exception should be granted by Wiltshire Council, not least because of the sheer disproportionate scale and size of this project.
- This is wholly inappropriate and will be extremely detrimental to the area in question, which comprises farmland, countryside walks, a heritage site, local residents and a community secondary school.
- The negative environmental impact is immeasurable in terms of the upheaval that will result, not least changes to the landscape, infrastructure, increased volume of traffic/pollution levels, endangering wildlife and decreasing the quality of life for the immediate population - all of which contribute towards making this development unjustifiable.
- There is no reason why Gompels cannot achieve their goal in a more suitable, pre-existing industrialised location, for which there is already plenty of scope on the nearby designated Trading Estate.
- This stretch of road is also used twice a day by students walking and cycling to/from Melksham Oak School, often over spilling into the busy A365 traffic. Accidents have already happened.
- Ridiculous place to even consider such a thing. Thought that was what industrial/trading estates were for, to keep these unsightly things away from our lovely countryside.
- The LVIA is flawed and there is an over-reliance on long-term mitigation and mischaracterised the landscape context.
- The letters signed in support of the scheme were misleading.

- I do not disagree with the need for the warehouse, but the location is completely inappropriate and wrong, and they fail to properly consider the existing residents.
- The environmental impacts on existing agricultural land in a solely residential area, not only visually but audibly, etc. Instead, by building a new warehouse instead of expanding in the Bowerhill Industrial Estate or re-locating, the impact on the environment and carbon levels would be considerable.
- The current and previous government both adopted a "Brown Field First" policy so therefore this application should be rejected because it's a Green field site.
- The redundant Cooper Tires site would be a better place for this development.
- The emerging Local Plan and the Neighbourhood Plan have not allocated commercial land on this proposed site.
- Core Strategy policy 34 (additional employment land) states that the proposal must be appropriate to its surroundings and not affect residential amenity.
- The location proposed is too close to a grade II listed farmhouse Heritage Asset.
- Increased traffic both during the building phase and during the operational phase, with potential for over 200 HGV movements/day. This high level of heavy vehicle movements will potentially make roads more dangerous for pedestrians and cyclists. The A365 does not have suitable capacity for more HGVs.
- Noise, light, and air pollution —While the applicant claims the site is not currently expected to operate 24 hours a day, no firm restrictions have been proposed to prevent extended or overnight operations in future. A facility of this size bring serious risk of long-term disruption through noise, artificial lighting, and increased air pollution including for schoolchildren at Melksham Oak School.
- The proposals would destroy the rural character of the area & impact a Heritage Site. The development would set a terrible local precedent for more industrial buildings in the wrong location, altering the character and appearance of this mostly rural area. Old Loves Farm nearby is a Grade II listed building that would be harmed.
- The Scale and Design of the warehouse is very unsuitable for this rural and low-rise residential setting.
- Some material submitted by the applicant is not related to material planning considerations.
- CP34 only allows employment development outside allocated employment land when:
  - 1 - There is clear evidence that no suitable sites exist within designated areas (There is no such evidence - see below)
  - 2 - The location is sustainable and well served by infrastructure. (It isn't)
  - 3 - The development supports rural economic needs or strategic employment objectives (It does neither)

The test for CP34 is about land use planning — not business preference, staff convenience, or operational habits.

The applicant has not convincingly demonstrated that allocated sites elsewhere in Wiltshire are unavailable. In fact - on page 4 of his own Design and Access Statement he does the exact opposite. He quite rightly identifies that Trowbridge and Chippenham sites exist and meet his criteria: Size, Viable, Deliverable and Road Access. He chooses to rule those sites out on the basis of distance alone stating that staff would leave due to child care commitments and being unable to commute on foot or by bike.
- This warehouse would be massive — totally out of place next to fields and houses. No amount of planting trees or digging banks is going to hide a building that size. It's going to stick out like a sore thumb and spoil the countryside that people here value.
- Projected job creation numbers are not accurate.
- The new documents do not demonstrate that this location is the only viable option. Core Policy 34 explicitly requires that alternative sites be ruled out before employment

development can be justified outside designated areas. Yet the applicant offers no detailed evidence that other industrial sites beyond those in the immediate vicinity of Swift Way were fully explored. Claims that sites were ruled out due to the potential impact on existing employees travel or childcare arrangements are not valid planning considerations. These sites exist, and the council should be focusing its efforts on unlocking their potential—not allowing the countryside to be lost to speculative development.

- Transport concerns also remain unresolved. The Highways response confirms the need for pedestrian safety improvements and highlights the narrowness of the existing footway, but the proposed upgrades are minimal and still leave significant risks. HGV movements are set to double, yet there are no detailed plans for mitigating the impact on local roads or improving public transport or cycle access.
- Core Policies 60 and 61 are clear: developments must be supported by appropriate infrastructure and located where they make use of existing sustainable transport links. This site does neither. The outline nature of the application leaves too much undefined, and there is no binding commitment to provide the infrastructure needed to make it viable. Supporting business growth should not come at the expense of landscape, heritage, and road safety. I urge Wiltshire Council to stand by its own planning principles and reject this application, encouraging future investment to focus instead on the industrial areas already designated for this purpose.
- Environmental & Landscape Harm Confirmed – The site supports local biodiversity and forms part of our rural landscape. Even the applicant's own assessments acknowledge permanent landscape changes. The drainage proposals also raise concerns about long-term flood and pollution risks.
- If this is approved, it sets a dangerous precedent – it says that any business with enough local goodwill can override planning policy and build whatever they want, wherever they want, regardless of the impact. That's not how planning is supposed to work.
- Environmental Impact - The development threatens to disrupt the local ecosystem by the removal of trees, destruction of green spaces, and poses an increased flood risk.
- The negative impact that this proposal will have on the countryside landscape and general character of this area is significant. There is no development remotely similar in the area and Outline Landscape and Visual Appraisal openly notes this fact. I would hope that the Wiltshire Council Planning Team consider the 15-year timeframe associated with the suite of landscape mitigation methods that would diminish these impacts to a “non- significant level.” Again, I would question the strength of the statement that the potential bypass route would have in influencing how this application is determined from a Landscape and Visual impact perspective.

## **9. Assessment**

### **9.1 Principle of Development**

Section 38(6) of the Planning & Compulsory Purchase Act 2004 and Section 70(2) of the Town and Country Planning Act 1990 require that planning applications must be determined in accordance with the Development Plan, unless material considerations indicate otherwise.

Adopted Wiltshire Core Strategy (WCS) Core Policy (CP) CP1 details the settlement strategy for Wiltshire. Melksham is identified as a Market Town where there is potential for development that will increase the jobs and homes in the town in order to promote sustainable communities.

WCS CP2 of the WCS states that development will not be permitted outside the defined limits of development unless the development falls under an exception policy, in this case CP34 – additional employment land.



WCS CP15 sets out the community area strategy for Melksham. It points to the issues stated at paragraph 5.83 and sets out that *“Melksham and Bowerhill village have a functional relationship and are considered together for the purposes of this strategy. ... The identity of these separate communities will need to be preserved through the planning process. ... However, it is recognised that ... Bowerhill ha[s] strong functional links to Melksham and ha[s] important individual characteristics which should be protected where practicable.”* And that *“development at Melksham should protect the historic environment”*.

WCS paragraph 5.83 also states that *“further employment growth in Melksham will help to further diversify the employment base, providing protection against possible future changes in the employment market. **The regeneration and improvement of existing employment sites, such as the Bowerhill Industrial Estate, remains a priority**”* (officer emphasis added above).

WCS CP34 states that *“Proposals for employment development will be supported within the ... Market Towns ... in addition to the employment land allocated in the Core Strategy. These opportunities will need to be in the right location and support the strategy, role and function of the town, as identified in Core Policy 1 (Settlement Strategy) and in any future community-led plans, including neighbourhood plans, where applicable.”*

The site is not situated within the defined limits of development, and CP34 is very clear in stating that employment development outside market towns development will be supported that *“are adjacent to these settlements and seek to retain or expand businesses currently located within or adjacent to the settlements”* where they *“are consistent in scale with their location, [and] do not adversely affect nearby buildings and the surrounding area or detract from residential amenity”*. (WCS CP34, i, b)

Officers assert that the application site is not adjacent to the boundary of the limits of development, and that the proposed building would not be consistent in terms of localised built form and scale with its location would adversely affect the nearby residential dwellings and would have a harmful impact on residential amenity. In addition, given the lack of any baseline noise assessment supporting evidence officers are unable to support the application in terms of fully appreciating the potential noise impacts this development may have.

The proposal is therefore considered contrary to WCS CP34. The emerging Local Plan includes a similar policy to CP34 (under Policy 64), which, as drafted, would seek to secure the same safeguarded forms of sustainable development. It should also be noted that emerging Local Plan can only be given some weight at this stage, appreciating that the first examination hearing session has been scheduled to only address the legislative duty to cooperate requirement.

The made Joint Melksham Neighbourhood Plan under Policy 10 requires that *“Proposals for the retention and reuse of previously developed employment land will be supported in principle, particularly by start-up and small businesses bringing a range of new employment opportunities. The Principal Employment Areas and the central Commercial Area”*.

The application site does not comply with the above as the site is a greenfield site in the open countryside.

Officers fully appreciate that there would be employment benefits to the proposal in terms of creating jobs associated to the expanding local business. It is also fully understood that the expansion of the business to the identified site would release the current Gompels buildings for

other businesses to move/expand into. Officers also acknowledge that the application submission includes a job creation projection that starts at 275, based on what is planned with some assumptions based on the knock-on impacts of other businesses also expanding. 100 additional jobs are projected to be created by this application for the Gompels business as the following breakdown submission made by the applicant suggests:

A breakdown of existing roles and employment growth is summarised below for Gompels HealthCare:

Role	Current numbers	With new development
Directors and management team	6	12
Procurement and accounting	14	25
Sales, Marketing, Customer services	24	48
Programmers and IT	4	10
Regulatory (H&S, Compliance)	2	7
Warehouse – pickers, supervisors	18	38
Forklift Drivers and other drivers	10	22
Maintenance and cleaning	2	6
New roles	-	12
<b>Total</b>	<b>80</b>	<b>180</b>

Notwithstanding the job creation benefits that the applicant projects for this application, officers strongly submit that this application proposal is in the wrong place.

The emerging Local Plan proposes new allocations of employment land in Wiltshire; and, as part of the Local Plan evidence base, an Employment Land Review (ELR) was undertaken which identified a demand for up to 24.6 hectares of employment land in the Chippenham, Corsham and Melksham cluster.

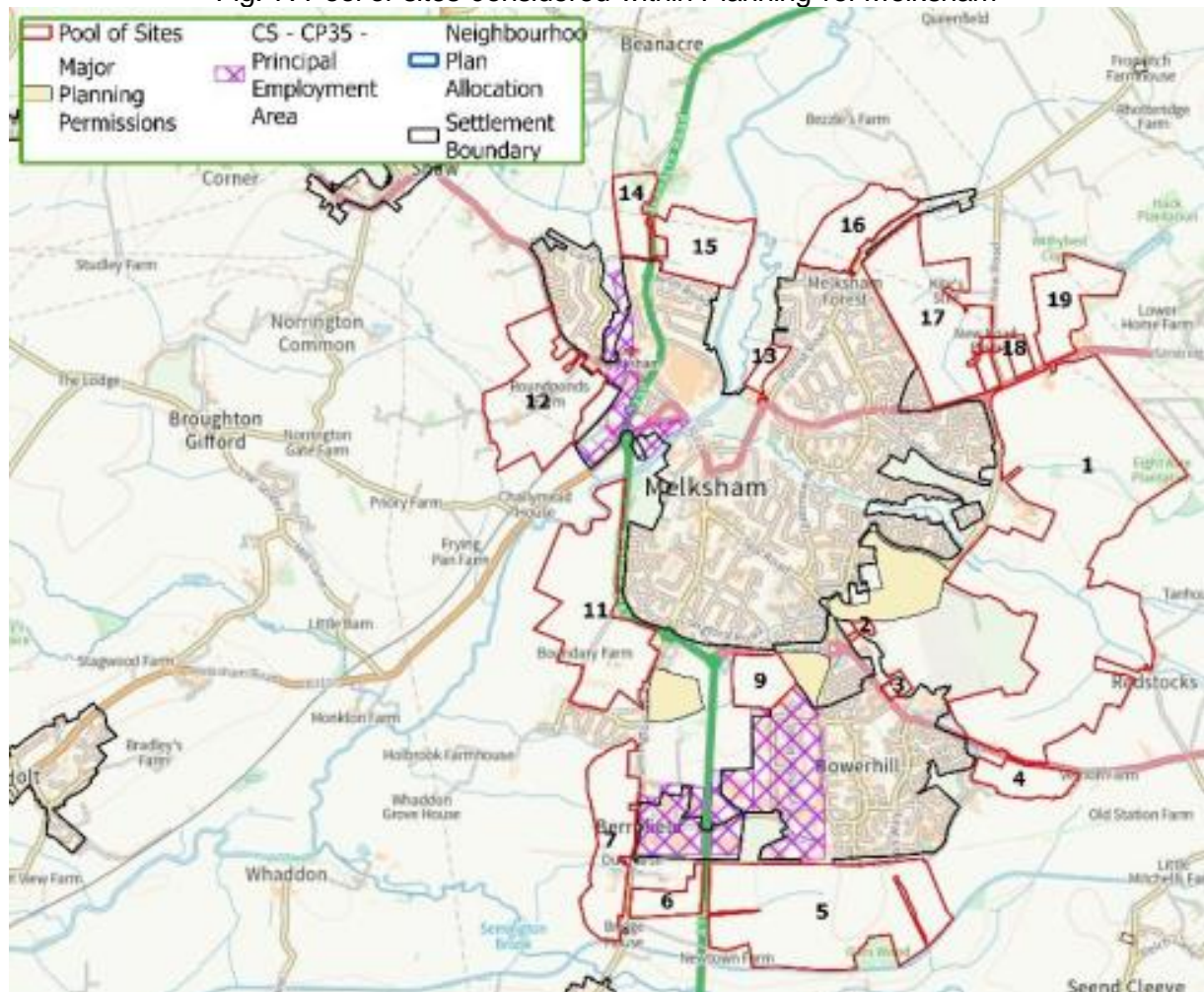
Melksham was identified as needing up to 1.2 hectares for offices and 6.9 hectares for new industrial / warehousing premises.

The Planning for Melksham supporting document recommends that new employment sites be allocated to ensure there is a sufficient supply of employment land to meet the forecast demand over the Local Plan period.

The document acknowledges that *“There are very few available sites left in the town for business expansion or inward investment and there is ongoing demand for more employment. The spatial strategy for Melksham identifies a requirement for approximately 5ha of employment land at the town which is proposed to be delivered on Site 1a ‘Land East of Melksham’.”*

Site 1a is located to the north of the application site, with very good connectivity. The application site was considered under the aforesaid local plan review process, and was notated as site 4 as shown in the below extract:

Fig. 7: Pool of sites considered within Planning for Melksham



The emerging plan sets out that *“Parts of Site 1 and Site 17 are considered capable of meeting the majority of the scale of residual requirements for both new homes and employment, as well as any infrastructure and mitigation requirements, that should be planned for.”*

Related to site 4, of which the application site forms a part, the site was considered for inclusion in the emerging Local Plan, but was rejected by the Council as an allocated site *“from a landscape perspective the site would be an urban encroachment into the rural setting between Bowerhill and Seend / Seend Cleeve which could prove difficult to mitigate.”* In addition, the site would have material heritage-based impacts as the following extract confirms:

**“Heritage** – development at this site would impact on the Grade II Listed Building Loves Farmhouse. Farmsteads have a fundamental relationship with their surrounding hinterland which contributes to their understanding and special interest. The site forms the immediate setting to Loves Farm. Whilst mitigation is possible, the requirement to preserve the setting of Loves Farm is likely to severely reduce site capacity. The site also has medium to high value features including a medieval settlement, comprising building platforms, hollow ways, field boundaries and ponds in the eastern half of the site.”

There would be substantive landscape harm too as set out below:

*“**Landscape** – the site has a strong, open rural character, which has a sense of separation from the adjoining suburban residential development at Bowerhill. There is potential for built form to alter the character of the existing well-integrated settlement edge and break treed skylines, and for development to result in prominent urban sprawl extending from Bowerhill into the surrounding, open rural landscape.”*

The highway and transport were also duly considered as follows:

*“**Highways/transport** - the location of this site to the east of the village of Bowerhill makes most town centre services and facilities difficult to access by active travel modes, although the site is in fairly close proximity to primary and secondary schools. The proposed bypass route will go through the middle of this site. This route will need to be safeguarded and this will significantly reduce the number of dwellings the site can deliver. This site is not supported by the Local Highway Authority. The site cannot be accessed from Bowerhill Lane or Hornchurch Road and hence it will need to be delivered direct from the A365, in a location where traffic flows are high with high recorded speeds.”*

In further analysis, the document continued by stating:

*“This site is considered unlikely to include employment land given its size and location at Bowerhill village, and also given the proximity to Bowerhill Industrial Estate to the west. However, the proximity to Bowerhill Industrial Estate would allow residents to easily access local jobs by walking and cycling. Effects on out-commuting are considered to be neutral.”*

Committee members are respectfully reminded of the importance attached to not compromising the Council's own emerging Local Plan which has reached examination stage. The Council has devoted significant resources to preparing and advancing the Plan and it would not be appropriate for the committee to open up a separate critique of the policies and strategies contained within the emerging local plan – which was supported at Full Council in late 2024.

This application should be assessed on its own merits with a planning judgement based on current adopted policy and all the material planning considerations which are set out in the remainder of this report.

In terms of policy, the proposed warehouse is considered a significant plan departure and officers are unable to support the application. The application is considered contrary to the made JMNP, the adopted WCS and NPPF. The current WCS and the emerging Local Plan focus on delivering economic, social and environmentally sustainable development (to which NPPF para 8 refers) and the promotion and delivery of additional employment land in the right places. This application fails to meet the essential policy requirements to deliver a sustainable development.

**The application is not supported by officers in principle when tested against the adopted WCS, the made JMNP and the NPPF.**

**Should the committee however be minded to support the application, contrary to officer recommendation, members are respectfully advised that there is a Plan Departure Direction imposed upon the Council by the Secretary of State for Levelling Up, Housing and Communities (“the Secretary of State”), in exercise of powers conferred by articles 18(4), 31(1) and 45 of the Town and Country Planning (Development Management Procedure) (England) Order 20151 (“the Order”) which came into force on 26 January 2024, which requires the Council, where it does not propose to refuse, to notify the Secretary of State.**

**The procedural reasons for the notification (should members not support the officer recommendation) are set out as follows (and taken directly from the SoS direction), and it should be fully appreciated that a failure to follow this requirement would expose the Council Judicial Review and maladministration.**

5. (1) For the purposes of this Direction, “development outside town centres” means development which consists of or includes retail, leisure or office use, and which –
- (a) is to be carried out on land which is edge-of-centre, out-of-centre or out-of-town; and
  - (b) is not in accordance with one or more provisions of the development plan in force in relation to the area in which the development is to be carried out; and
  - (c) consists of or includes the provision of a building or buildings where the floor space to be created by the development is:
    - (i) 5,000 square metres or more; or
    - (ii) extensions or new development of 2,500 square metres or more which, when aggregated with existing floor space, would exceed 5,000 square metres.

The following sections appraise the application proposals in more detail starting with design, scale and visual impacts upon the surrounding area and residential amenity.

#### 9.2 Design, scale and visual impact upon the surrounding area and residential amenity

Adopted WCS Core Policy 57 requires a high standard of design in all new development and requires development to respond positively to the existing townscape and landscape in terms of building layout, built form, height, mass, scale, building line, plot size, design, materials and streetscape.

The site is in the open countryside and is agricultural land, with the A365 to the north and residential properties and gardens to the south, south-west and north-west.

The application is submitted in outline with all matters reserved. Therefore, all the detailed matters such as design and appearance are not open for the Council to determine.

However, the application submission includes some indicative elevations and floor plans for the proposed warehouse which the application description states would include office space and associated works.

Officers have fully considered the applicants supporting statements and acknowledge that the application is specific in terms of the amount of provision that the business needs to operate, and



the indicative details provided on the size and scale of the proposed warehouse is the subject to the following officer analysis.

Fig. 8: Existing Site Photographs

Views from the A365



View from the southern neighbouring garden No 455 Bowerhill



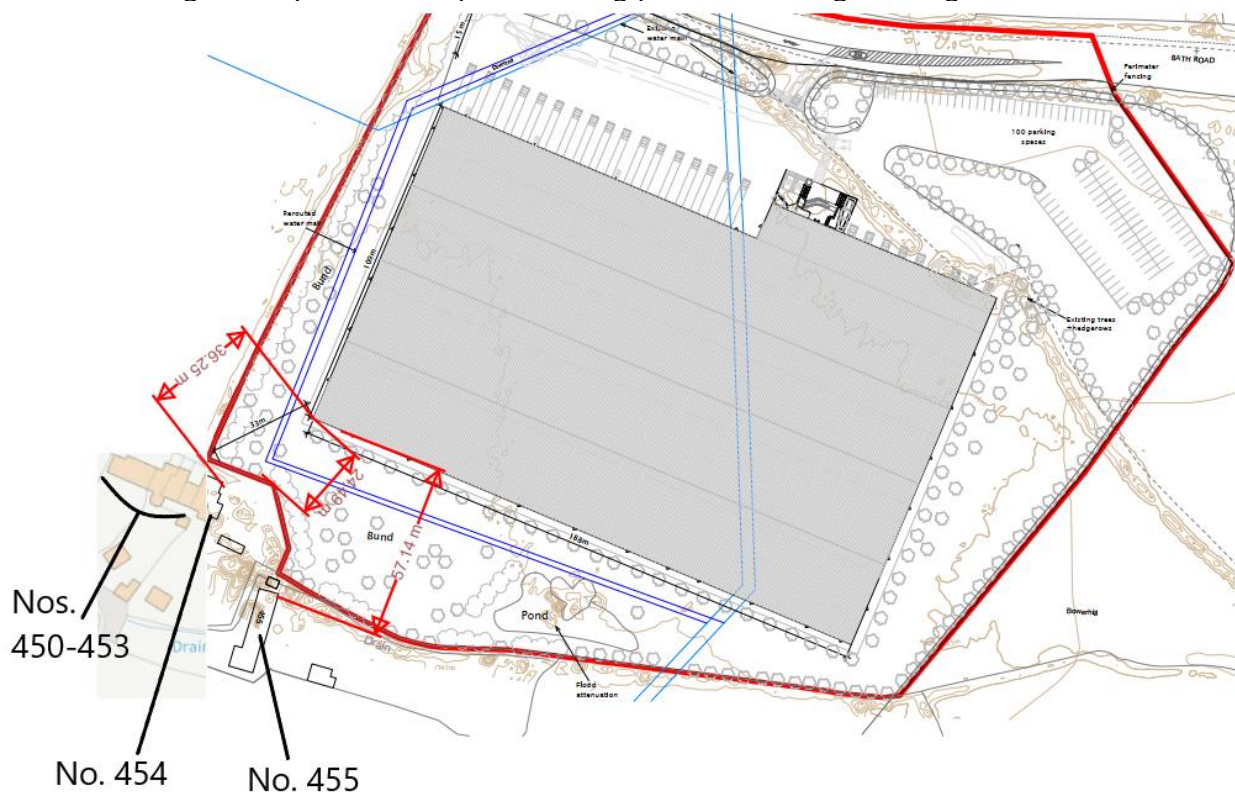


View from the south-western neighbouring garden No. 454 Bowerhill



The neighbouring houses, as shown below, are two storey properties that do not appear as significant visual intrusions in the prevailing landscape when viewed from the open agricultural land with boundary hedging and trees.

Fig. 9: Proposed block plan showing positions of neighbouring houses.



The proposed building would have a significant harmful overbearing impact on the nearby residential properties, and there would be a substantial impact on amenity.

The visual impact of the development on No 454 Bowerhill would be especially significant with the proposed warehouse dominating the immediate locality and markedly changing what is an open green field to a significant industrial complex of a height and scale that is not considered appropriate to its immediate context (noting that the nearest industrial sized buildings located in the employment estate is 1km distant), see photo above in Fig. 8.

The proposed building would be just 24m from the boundary of No. 454, and 36m from the rear elevation of No. 454 itself.

No.455 Bowerhill to the south of the application site would be similarly significantly affected, see photo above in Fig. 8 and below in Fig. 10, being 57m from the proposed building. No. 455 has a garden running from the dwelling east along the southern side of the application site, therefore the proposed building would impact the full length of the garden, as well as impact on the dwelling itself.

Fig. 10: Photograph from No. 455 first floor overlooking their garden (right) and the application site (left).



Other local residential properties (Nos. 450-453) would be affected but to decreasing degrees compared to Nos. 454 and 455. However, the impact on these additional nearby properties from the very large proposed building would still have a demonstrably harmful impact in terms of the overbearing impact.

The proposed building would be a very large building of utilitarian design. It would be 188m long and between 109m and 121m wide. The building would have 16m high eaves, with the ridgeline being 17.5m at the apexes. The indicative floor area would occupy 2.2 hectares of the 5.5-hectare site which in totality would be completely unrepresentative of the immediate locality.

The proposed building would not at all relate well with the surroundings and would be a highly incongruous structure due to the projected size, siting, scale, design – all of which would lead to a deleterious impact on the immediate character and localised amenities.



Officers acknowledge that the applicant has attempted to filter the visual impact of the warehouse building by proposing tree planting and provision of a planted bund to the south and west of the proposed building, however as the Council's landscape officer has noted, there are significant anomalies set out within various supporting plans and documents submitted by the applicant and officers are not satisfied that a significant level of landscape mitigation can be provided to materially filter the impact of the development. Moreover, the future tree planting would take many years to mature to deliver any substantive filtering mitigation. The applicant's submitted Design and Access Statement states that it would take 15 years to reduce the impact to a non-significant level. This is not acceptable to officers and is further substantive reasoning to refuse the application.

**Officers have concluded that the proposal in terms of its indicative size, siting, scale, design, and impact on residential amenity and local character would be highly incongruous and harmful and contrary to the Council's Core Strategy policy CP57, the made JMNP and the NPPF. Moreover, the applicant's failure to submit a baseline noise assessment is further grounds for refusal which would materially limit the reach and application of any imposed planning condition that would otherwise seek to restrict a certain decibel level from the development when noise is measured at all nearby vulnerable receptors.**

### 9.3 Impact on the landscape

The site sits in the Avon Vale Countryside Character area outside of the Melksham settlement boundary. The site forms part of the open countryside to the east of Melksham that is broadly flat in character below the rise to Seend in the south-east. The immediate agricultural field system is also quite open in character, with traditional hedging boundaries with sporadic trees. This open character defines the countryside at this point which would offer very limited screening/filtering mitigation (from existing landscaping) to what would be a very large warehouse building.

The Council's landscape officer is very critical of the application and strongly objects and argues that

*"The building itself is approximately 17.5m high at the ridgeline and thus is considerably taller than any of the nearby development, making it a visual outlier. There is a 146m gap between the site and the settlement boundary of Bowerhill, whilst the nearest similar sized industrial / warehouse buildings at Bowerhill Industrial Estate are over 1km to the west."*

*"The eastern expansion of Melksham to the North of this development [would be] low rise housing development and primarily residential in nature which would again make this scheme an outlier even if the eastern edge of Melksham was fully built out. The development therefore has to be able to stand on its own merits without relying on other developments to either weaken the surrounding rural character of the landscape so that the scheme can be deemed acceptable or help to screen it from view."*

*"I note the substantial economic benefit to the local economy that the expansion of this local business would allow as set out in the DAS, but need to balance this with the likely harm to landscape character that placing a large scale warehouse on an isolated greenfield site in the rural countryside contrary to Core Policy 51 and NPPF (2024) para 187 (b) '...recognising the intrinsic character and beauty of the countryside...'"*

*"The site is isolated from the main industrial estate located to the west of Bowerhill and thus would be out of scale to the landscape character and context."*

It is clear from the landscape officer's comments that the proposed building would be of a size and scale that would be significantly harmful to the landscape character.

**Officers have concluded that the proposed building would, by virtue of its size, siting and scale, be a highly incongruous and harmful in landscape terms and would be contrary to the Council's Core Strategy policy 51 and the NPPF.**

#### 9.4 Ecology Issues

Adopted WCS Core Policy 50 requires all development proposals to demonstrate how they protect features of nature conservation and geological value as part of the design rationale, with the expectation that such features shall be retained, buffered, and managed favourably in order to maintain their ecological value, connectivity and functionality in the long-term.

Furthermore, the policy specifies that all development should seek opportunities to enhance biodiversity.

An ecological assessment has been submitted in support of this application however the applicant has submitted insufficient information to determine potential impacts on the following protected sites, habitats and protected/ notable species: Bath and Bradford on Avon Bat SAC, hedgerows (priority habitat), hedgerows (priority habitat), bats (foraging and commuting including LHB), dormice, great crested newts, birds and reptiles.

Under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) this application would be required to deliver 10% Biodiversity Net Gain (BNG). The Biodiversity Gain Plan condition will automatically apply if approval is forthcoming. Information required by the Article 7 of The Town and Country Planning (Development Management Procedure) (England) Order 2015 has not been submitted.

The approximately 5.5-hectare site is not covered by any statutory or non-statutory nature conservation designations. However, the southern boundary of the site lies within a lesser horseshoe bat LHS Core Roost Buffer for a maternity roost located at Seend Head Mill and as such the impacts on the Bath and Bradford on Avon bat Special Area of Conservation must be considered.

The proposed site plan shows that development would encroach on hedgerows that would result in the significant loss and fragmentation of the habitat, to the detriment of priority habitat.

Without the relevant protected species surveys being undertaken and completed, and the preparation of an Ecological Impact Assessment, the Council cannot conclude that harm would not be caused to priority habitat and the protected species referred to above.

**In carrying out its statutory function, the LPA must be satisfied that the proposal would not result in significant adverse effects on protected habitats or species. As set out above, the Council's ecologist is not satisfied with the level of supporting ecology information provided by the applicant, and as such, this application must be refused.**

**For the avoidance of any doubt, appropriate assessments are required where a Habitats Regulations Assessment (HRA) are essential for many applications to comply with the law and to have a fully transparent appraisal of the ecological impacts of any given project pursuant to any known protected habitat site/conservation status. The purpose of an**

appropriate assessment is to enable planning authorities to eliminate adverse effects on the integrity of these protected areas.

HRA Appropriate Assessments must be done by the decision-maker (and someone of competent authority and following consultation with Natural England) when deciding the application. In the absence of an HRA supportive Appropriate Assessment for this application, any decision to approve the application would be considered by officers to be unlawful and open to Judicial Review and expose the Council to maladministration.

Officers have concluded that the proposed building and site layout would result in harm to protected species and priority habitat. There is not enough information submitted to carry out an Appropriate Assessment in order to legally comply with the Habitat Regulations. Therefore, the proposed development must be refused because the application fails to comply with the Conservation of Habitats and Species Regulations 2017 (as amended) and is contrary to adopted Wiltshire Core Strategy Policy 50 and the NPPF.

#### 9.5 Impact on designated Heritage Assets

The application site is less than 100m from the Grade II listed building, Old Loves Farm, which sits to the northwest of the site.

The farm is a good intact example of a traditional farmhouse and farmstead, of national importance, and whilst some of the farm buildings have been converted to residential use, the overall character of the site and its relationship with its rural surroundings has been preserved. Farmsteads have a fundamental relationship with their surround hinterland, which contributes to its understanding and special interest. Wide open spaces and field systems contribute to the immediate and wider setting of historic farmsteads such as this.

The Council's conservation officer argues that:

*"The proposed warehouse will be a vast building, built to the boundary of the site and have a visual impact on the setting of the designated heritage asset, causing harm, and therefore I object to the proposals as they are contrary to current national and local policies that seek to preserve or enhance the historic environment."*

A Heritage Statement was subsequently prepared and submitted to address the aforesaid Conservation-based concerns.

The Statement references new housing development to the west of the listed farmhouse, however this was rejected as being some kind of material precedent as the following explains:

*"...the presence of development to the west sets no precedents for this proposed development, the type and scale of the housing development is quite different to that of a proposed warehouse. The fact that there is development to the west does, and should, not automatically mean that further erosion of the wider setting of the listed farmhouse is acceptable. The additional erosion of the rural character of the setting has a negative cumulative impact, and therefore fails to preserve or enhance the setting of Old Loves Farm, which is against policy within the NPPF and Core Strategy."*

The setting of the Grade II listed farmhouse and its farm buildings would be irrevocably harmed by the proposed development. The proposed building would divorce the historic farmstead from the open countryside which currently forms a historically and contextually valuable setting.

The proposed mitigation, through the indicated planting of trees and vegetation, would not outweigh the harm that would be caused to the setting of the listed building, and this is furthermore reason to refuse the application.

**Officers have concluded that the proposed building would result in very significant harm to the setting of Old Loves Farm, a Grade II listed building, and its historic farmstead. Therefore, the proposed development would be contrary to the Council's Core Strategy policy 58 and the NPPF.**

#### 9.6 Drainage Matters

A site-specific flood risk assessment (FRA) has been submitted by the applicant in support of the application which was revised to include additional data following the Council's Drainage Authority requests.

The site is in Flood Zone 1, which means that the site has the lowest risk for flooding. However, the proposal would lead to the majority of the 5.5-hectare site (currently a green field) being laid as hardstanding and the erection of a significant building occupying over 2 hectares. This would lead to the site being much less permeable and would require a significant surface water management system to avoid SW runoff leading to offsite flooding. The proposed development would also require dedicated wastewater connections.

Whilst the application is an outline with all matters reserved, the Council needs to be satisfied that the applicant's proposed surface and foul water strategy would be feasible.

For this application, the Council's Drainage Authority objects due to various factors, including there being insufficient detail to enable a full assessment of the impact of the proposal on the drainage of the site.

Revised information was submitted to deal with the initial drainage-based concerns and objections, and some of these issues have been overcome. However, there remains several matters outstanding, and the drainage team maintain their objection.

The outstanding matters include that the proposed SuDS system would not be adequately controlled such that it would cause unrestricted flows through the swale and into the watercourse. In addition, the proposed building has not been shown to deal adequately with various flooding events.

**Officers are not satisfied with the applicant's proposed drainage strategy which has not demonstrated the surface and foul water drainage strategy would be feasible based on the current information provided. Therefore, the application is considered to be contrary to WCS CP67 and CP68 and section 14 of the NPPF.**

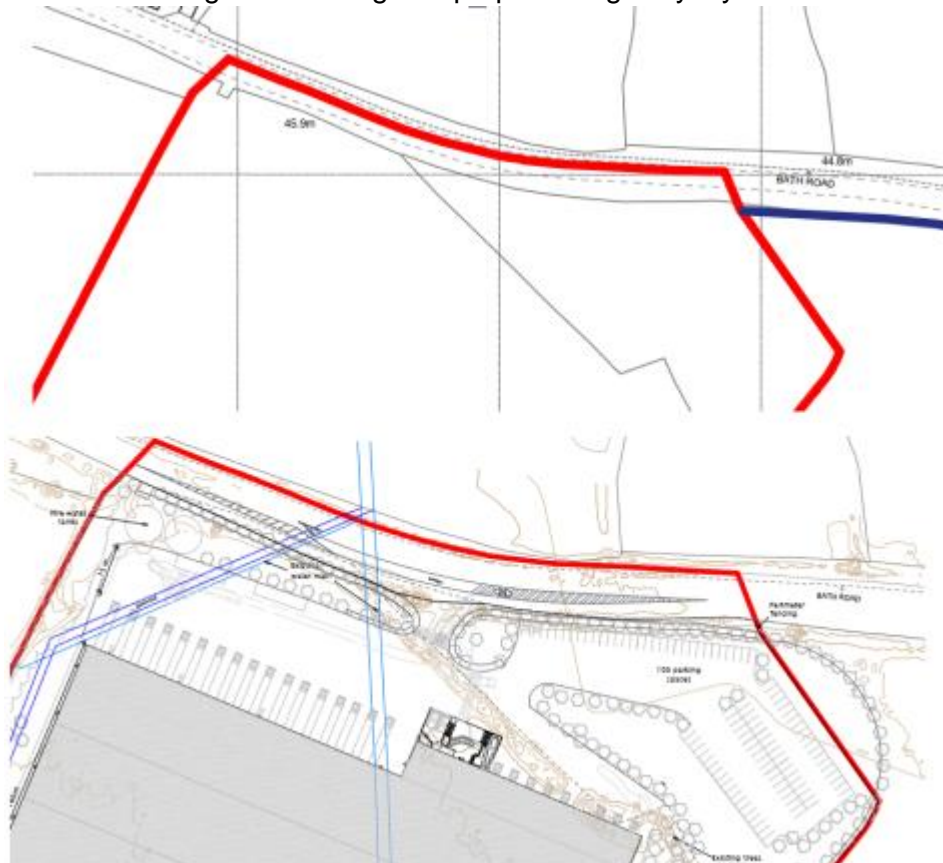
#### 9.7 Highway/ Access/ Parking Matters

Adopted WCS Core Policy 61 seeks to ensure that all new development is capable of being served by a safe access to the highway network, and Core Policy 64 sets out to manage the demand for parking and sets non-residential parking standards based on maximum parking standards.

Paragraph 116 of the NPPF states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

This application is submitted in outline with all matters reserved. Access details are therefore not under full consideration at this time, as they would be dealt with in a Reserved Matters application. However, the applicant has submitted an indicative site plan show the addition of a turning lane to the A365 with a pedestrian crossing point and footway.

Fig. 11: Existing and proposed highway layout



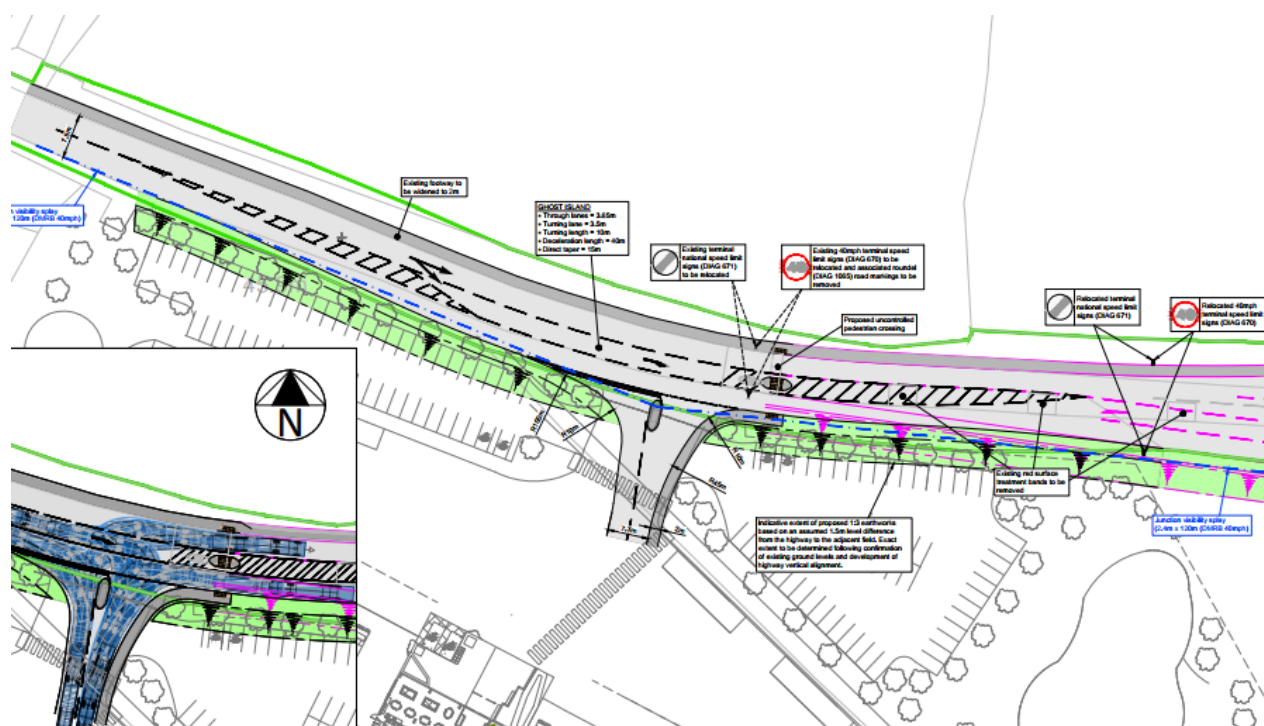
The Council's highways team have concluded that:

*"The proposed footway improvement between No.416a and the proposed crossing point east of the new junction is now shown added to Drawing 23070/PHL-03 Rev B. The reconstructed and widened footway will need to be a minimum width of 2.0m as indicated. However, if ditch culverting is subsequently required to achieve this, then consideration should be given to a shared use path (SUP) length of increased width to allow cyclist use (3.5m). As noted earlier, the speed and volume of traffic along this part of the A365 Bath Road may encourage cyclists to use a 2.0m footway anyway.*

*"The Site Plan (Drawing 100-A)) and the A365 Site Access Layout Plan (Drawing 23070/PHL-03 Rev B) remain inconsistent in several ways. TA01 advises: "the internal layout of the site will be subject to Detailed Reserved Matters applications at a later date. However, the submitted plans*

are presented for illustrative purposes to provide context to the proposals in respect of access and layout”.

Fig. 12: Indicative access layout



Whilst this is accepted, it would be expected that the two plans included now in the TA would show a higher level of consistency and conformity than is the case. As noted, they are quite different, so what ‘for illustrative purposes’ should be broadly assumed as the proposed in principle is unclear.”

More information is required to address the highway issues, however the level of detail requested by the highways authority goes beyond the reasonable scope of this outline application.

The inconsistencies within the submitted information identified by the Highways officer would be resolved and clarified at the detailed application stage.

**Whilst it is duly noted that the Council’s highway team request more details and could be secured through the discharge of condition process and subsequent Reserved Matters application.**

## 10 Conclusion (The Planning Balance)

Planning law requires that applications seeking planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise.

The proposal seeks to erect a very large warehouse with office provision in the open countryside along with car parking for 100 motor vehicles and associated works with works to the public highway on land that is not allocated for such industrial development. Officers fully appreciate the applicant’s business aspirations to expand what is a very successful local business and there are clear economic benefits that would be linked with the proposed development, and once built, the existing premises owned by the applicant would most likely be of appeal to other businesses seeking to expand their own operations.

The proposal is however fundamentally contrary to national and local planning policies, including the NPPF, the Wiltshire Core Strategy and the Joint Melksham Neighbourhood Plan. When tested against the emerging Local Plan, which can be afforded some weight now that the local plan examination had a programme hearing scheduled to review the legislative requirements of the local plan. Officers submit that when tested against the emerging Local Plan, the proposals would be non-compliant and would be manifestly harmful in terms of the deleterious landscape impacts, residential amenity effects and through the higher end level of less than substantial harm caused to the setting of the grade II listed building at Old Loves Farm.

The application is also fundamentally deficient in terms of ecological analysis and in the absence of an HRA Appropriate Assessment, the application cannot be supported since the impacts on protected species and priority habitats have not been fully appraised, and unless the application is withdrawn, to be legally compliant, it should be refused.

As a reminder, the application is brought to committee because of the terms set out in the Cllr call-in request as listed on the opening page of this report, and because the application represents a major policy departure from the WCS.

**RECOMMENDATION:** That the application be refused for the following reasons.

***The applicant has failed to submit sufficient ecology-based information to adequately assess and mitigate the impacts of the development on protected species and priority habitat. Moreover, no appropriate assessment has been undertaken, which is a legal requirement for any endorsed grant of planning permission, and as a consequence, the proposal fails to meet requirements of the Habitat Regulations and are contrary to WCS CP50 as well as paragraphs 187a), 187b), 187d) and 193a) of the NPPF and in accordance with paragraph 193a) the development should be refused.***

***The warehousing/office development proposals would be located outside any defined settlement limit and principal employment area (as set by the adopted Wiltshire Core Strategy), and it would result in a significant industrial building covering more than 2.2 hectares in the open countryside that would have a significant deleterious impact on the rural landscape character and would materially reduce the undeveloped land parcel between Bowerhill and Seend/Seend Cleeve which is considered important to maintain the separate identity of the two settlements. The application is contrary to WCS CP1, CP2, CP15 (with reference also to WCS paragraph 5.83) and CP34, CP51 as well as being in conflict with the made Joint Melksham Neighbourhood Plan and the NPPF, including para 8 and 187b.***

***The proposed warehouse/office building by virtue of its indicative size, siting, scale, design would be an incongruous and harmful feature within the area. The building would have materially harmful impacts on residential amenities (and most particularly on the properties at 454 and 455 Bowerhill, and to a lesser, but still materially harmful degree, at 450 – 453 Bowerhill) that would not be sufficiently mitigated by the applicants proposed landscape scheme. The proposal is therefore found to be contrary to WCS CP57, the made Neighbourhood Plan and the NPPF which require a high-quality form of development that is complementary to the immediate surroundings.***

***In addition, the lack of a Noise Assessment, identifying existing and proposed levels of noise at the site boundaries of nearby vulnerable receptors (dwellings), means that the Council cannot be satisfied that the level of noise created by the proposed building and use***

***of the site would not harmfully impact the amenities of local residential properties. The proposal is therefore found to be contrary to WCS CP57 and NPPF paragraph 135 f).***

***The application proposals would result in less than substantial harm (at a high level) to the setting of the Grade II listed building Old Loves Farm, and the historic farmstead, contrary to the Core Policy 58 and section 16 of the NPPF. The less than substantial harm is considered to be at the upper end of the scale and is not outweighed by public benefits or the applicants asserted economic benefits.***

***In recognition of the substantial area of land to be developed and the indicative footprint and roof cover area, the Council is not satisfied that the applicant has submitted sufficient information to adequately assess and mitigate the impacts of the development pursuant to drainage interests and to satisfy the policy requirements that the application proposal would not lead to off-site flood risks as required by WCS CP67 and CP68.***



## **Teresa Strange**

---

**From:** Teresa Strange  
**Sent:** 25 June 2025 13:44  
**To:** Russell Brown - Wiltshire Council (russell.brown@wiltshire.gov.uk)  
**Cc:** Reay, Tamara  
**Subject:** RE: PL/2024/11426 Gompels warehouse, Melksham

Hi Russell

I am just following up on this query raised by the parish council, now that the Officer Report has been published, and shows that the Wiltshire Council Economic Development team have not submitted comments. Are you able to clarify why they were not consulted, but they were on the planning application for a significantly smaller warehouse application just north of the parish at the end of last year? <https://development.wiltshire.gov.uk/pr/s/web-comment/a07Q300000LtehsIAB/economic-developments-comment> or if they were consulted, but decided not to comment? Just anticipating what the parish council may query when they meet as a Planning Committee on Monday 30<sup>th</sup> June evening, but as the Strategic Committee is the following morning they won't have time to raise before then.

When attending the Strategic Committee at the end of January for a large development in the parish, the meeting was paused in order to gain the view of the Ec Dev officers, which they were unable to locate and speak at the meeting.

Any update you can give would be useful please.  
With kind regards, Teresa

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**Advanced Notice of Leave:**  
Tues 17<sup>th</sup> June to Thurs 26<sup>th</sup> June

**Wellbeing Statement** I may send emails outside office hours but never with any expectation of response. Please just get back to me when you can within your own working hours. Thank you.

Want to keep in touch?  
Follow us on facebook: Melksham Without Parish Council or Teresa Strange (Clerk) for additional community news  
On X: @melkshamwithout  
On Instagram: melkshamwithoutpc  
On LinkedIn: Melksham Without Parish Council

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**From:** Teresa Strange

**Sent:** 20 February 2025 17:40

**To:** Russell Brown - Wiltshire Council ([russell.brown@wiltshire.gov.uk](mailto:russell.brown@wiltshire.gov.uk)) <[russell.brown@wiltshire.gov.uk](mailto:russell.brown@wiltshire.gov.uk)>

**Cc:** 'Developmentmanagement' <[developmentmanagement@wiltshire.gov.uk](mailto:developmentmanagement@wiltshire.gov.uk)>; Reay, Tamara <[Tamara.Reay@wiltshire.gov.uk](mailto:Tamara.Reay@wiltshire.gov.uk)>

**Subject:** RE: PL/2024/11426 Gompels warehouse, Melksham

Hi Russell

Have you consulted the Economic Development team on this application at all?

Considering that most of this will presumably hinge on the balance between the policies for Additional Employment Land and impact on the local amenity/landscape and heritage, it would be good to see the Ec Dev comments, as they did on the one I mentioned below; rather than just the comments of the applicant on the economic benefit/need in the area.

With many thanks, Teresa

---

**From:** Teresa Strange

**Sent:** 30 January 2025 19:58

**To:** Russell Brown - Wiltshire Council ([russell.brown@wiltshire.gov.uk](mailto:russell.brown@wiltshire.gov.uk)) <[russell.brown@wiltshire.gov.uk](mailto:russell.brown@wiltshire.gov.uk)>

**Cc:** 'Developmentmanagement' <[developmentmanagement@wiltshire.gov.uk](mailto:developmentmanagement@wiltshire.gov.uk)>

**Subject:** PL/2024/11426 Gompels warehouse, Melksham

Hi Russell

I am just reading more into this planning application for the Gompels warehouse before the parish council consider on Tuesday evening.

I have looked at the one the other side of the parish, considered recently, and note that Economic Development were consulted, and wondered if this was something considered for this application, it doesn't look like they have been from the consultee list.

**PL/2024/03104**

**Site Address**

OCTAVIAN BONDED WAREHOUSE, GOODES HILL, GASTARD, CORSHAM, SN13 9PP

**Proposal**

Proposed Construction of 2-Storey Extension to the Side of the Existing Offices and Single Storey Storage Building

With kind regards, Teresa

Teresa Strange

Clerk & Responsible Financial Officer

Melksham Without Parish Council

First Floor

Melksham Community Campus  
Market Place, Melksham  
Wiltshire, SN12 6ES  
01225 705700  
[www.melkshamwithout-pc.gov.uk](http://www.melkshamwithout-pc.gov.uk)

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Comment

Economic Development's comment

Planning Application	Stance
<u><a href="#">PL/2024/0310...</a></u>	Support

Details (?tabset-ae70b...

Files (?tabset-ae70b=2)

▼

Information

Comment Name

Economic Development's comment

Comment Number



WC-24-05-300403

Text



The Economic Development Service welcomes this proposal by Octavian Wine Services to invest further in its Wiltshire facilities. Octavian is a significant high value brand, a successful specialist service provider, and a significant private employer locally. The company's ongoing presence and growth delivers a range of direct and wider benefits to the economy and community.

The proposed investment is an enhancement to the established secure employment site, enabling the core business to grow via a new product category which requires different storage in an independent new building. This diversification is expected to support a further 10-12 local jobs over the next 5 years. It also provides a much improved office working environment better reflecting the company's brand and further supporting staff recruitment and retention. The proposal helps address efficiency, sustainability and site-specific considerations, and responds positively to feedback on earlier proposals and more recent local consultation.

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Notice

# **SN12 6SS, Wiltshire Council: environmental permit application advertisement – EPR/SB3455TZ/A001**

Published 3 June 2025

**Applies to England**

Contents

Details of the application

How to comment on the application



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# Details of the application

The Environment Agency has received a new bespoke application for an environmental permit under the Environmental Permitting (England and Wales) Regulations 2016 from Wiltshire Council.

**Application number**

EPR/SB3455TZ/A001

**Regulated facility type**

Radioactive substances activity

The facility is land formerly occupied by RAF Bowerhill. RAF sites have a historic legacy of using radioactive substances as luminising agents on aircraft components and disposing of such items on site. Monitoring surveys have identified areas where there are elevated radiation measurements, and it is proposed to undertake further investigations and potentially remediate the site. The application is for an environmental permit to allow the temporary on-site storage of excavated wastes and their subsequent off-site transfer to suitably permitted sites for final disposal. There will be no importation of radioactive wastes or materials to the site from elsewhere.

**Regulated facility location**

Former RAF Bowerhill  
Lancaster Road  
Bowerhill  
Melksham  
Wiltshire  
SN12 6SS

## How to comment on the application

If you have any comments on the application send these by 1 July 2025

Email: [rsr.rotherham2.ne@environment-agency.gov.uk](mailto:rsr.rotherham2.ne@environment-agency.gov.uk)

Or write to:

Environment Agency  
PO Box 4404  
Sheffield  
S9 9DA

The Environment Agency will normally put any comments it receives on the public register. This includes your name but not your personal contact details. Please tell us if you do not want your response to be public.

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You can read guidance on [radioactive substances regulation \(/government/uploads/system/uploads/attachment\\_data/file/69503/pb13632-ep-guidance-rsr-110909.pdf\)](https://www.gov.uk/guidance/radioactive-substances-regulation)

This includes

- guidance to applicants
- guidance on how to comply with our permits.



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# **WILTSHIRE COUNCIL – SUPPORTING INFORMATION FOR PERMIT APPLICATION**

# 1 Introduction

This document has been produced in support of Wiltshire Council's application for a Radioactive Substances Regulations (RSR) Environmental Permit for the remediation of land contaminated with radium-226 (Ra-226) at the former RAF Bowerhill station, Lancaster Road, Bowerhill, Melksham, Wilts, SN12 6SS.

This document must be read alongside the other Permit application documents including:

- Form EP-RSR: Application for an environmental permit – Part RSR-A;
- Form EP-RSR: Application for an environmental permit – Part RSR-B4; and
- Form EP-RSR: Application for an environmental permit – Part RSR-F.

The application is being made for a new bespoke RSR Permit to:

- Accumulate up to 500 MBq of Ra-226 in 200 m<sup>3</sup> for a period of up to 180 days; and
- Dispose of, via transfer, up to 1 GBq of Ra-226 in 100 m<sup>3</sup> to a permitted waste recipient. (500 MBq to Landfill and 500 MBq for incineration)

# 2 Supporting Information

This section contains the detail for the relevant sections of Parts RSR-A, RSR-B4 and RSR-F and includes information pertaining to the Permit request.

Form	Section	Additional Information
RSR-A	13	<p><b>Details of existing contamination</b></p> <p>Radiological surveys undertaken by Aurora Health Physics Services in January 2025 identified locations on the former RAF Bowerhill site contaminated with Ra-226. This is likely due to luminising activities undertaken prior to the 13 May 2000 by the RAF when they used the site as an engineering and instrument training school. Intrusive sampling has not been undertaken at this time to determine the activity concentrations of Ra-226 in soil. It is Aurora's experience of similar sites that soil concentrations of Ra-226 can be up to 300 Bq/g and can include old dials containing several MBq of activity.</p>
RSR-B4	7a	<p><b>Arrangements for transfer of radioactive waste to another person</b></p> <p>A letter of acceptance in principle to accept the Low Level Waste have been provided by Augean who operate the landfill site at Kings Cliffe (ENRMF). Augean hold a suitable Permit to accept and dispose of radium contaminated material. A further letter of acceptance in principle has been obtained from Tradebe to collect and dispose of radium artifacts.</p>

Form	Section	Additional Information
RSR-F	1	<p><b>Determination of complexity</b></p> <p>Using Annex 1 “RSR Complexity Methodology” from “Form Guidance EP-RSR: How to apply for an environmental permit – Part RSR-F”.</p> <p><b>Radionuclides:</b> Radium-226</p> <p><b>Radionuclide Group/Band:</b> Ra-226 Band 1</p> <p><b>Purpose of Permit:</b> Accumulation and disposal</p> <p><b>Annual limit requested:</b> 1GBq Ra-226,.</p> <p>As the application does not include any permitted discharge limits to sewer, water or air the disposal ratio will be zero which is less than 30,000 and as such the complexity will be low.</p> <p><b>Determined activity:</b> 1.2.6 Keeping or use of unsealed radioactive sources and subsequent disposal only by transfer of radioactive waste – not high complexity.</p> <p><b>Permit application fee:</b> <span style="background-color: black; color: black;">REDACTED</span></p>

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# **Wiltshire Council – Management of Compliance with the Environmental Permitting (England and Wales) Regulations 2016 as amended for Bowerhill, Melksham**



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DRAFT

# 1 Introduction

This document describes the management arrangements that Wiltshire Council (hereafter referred to as the Permit Holder) has in place in order to achieve compliance with the terms and conditions of the Radioactive Substances Environmental Permit (reference: XXXXX) issued by the Environment Agency (EA) under the Environmental Permitting (England and Wales) Regulations 2016, as amended (EPR16).

The Permit relates to a site contaminated with radioactive material at the former RAF Bowerhill station, Lancaster Road, Bowerhill, Melksham, Wilts, SN12 6SS. Parts of the Permitted site have been identified as being contaminated with radium-226 from historic use of the site by the RAF as an engineering and instrument training school. The Permit Holder intends to undertake sampling and potential remediation of the site to allow future redevelopment.

## 2 Management System

The Permit Holder is committed to establishing robust operating practices using equipment and facilities, implementing policies and procedures, and working in a manner which is consistent with established best industry practice. The Permit Holder is also committed to promoting the highest standards with regards to achieving regulatory compliance and implementing radiological safety practices at the site. It is the intent of the Permit Holder to ensure the application of the Best Available Techniques (BAT) with respect to the accumulation and disposal of radioactive wastes.

The management of the radiological sampling and potential remediation activities at the site (which gives rise to the need to accumulate radioactive wastes) has been subcontracted by the Permit Holder to a Principal Contractor (Atkins Réalis) who has engaged specialist advisory support to enable them to set out how they intend to differentiate, characterise, segregate and prepare radioactive wastes from the site for final disposal to a permitted waste recipient.

The above work will be undertaken in a manner consistent with BAT. The Permit Holder and the Principal Contractor has appointed its own Radiation Protection Adviser (RPA) and Radioactive Waste Adviser (RWA) - Aurora Health Physics Services Ltd (Aurora) - to provide advice on achieving compliance with the requirements of both EPR16 and the Ionising Radiations Regulations 2017 (IRR17).

The Permit Holder will only allow remediation work to proceed once it is satisfied that its contractors have provided details of the arrangements intended to ensure any sampling or remediation activities on the site is carried out in compliance with applicable radiological legislation and these have been approved by the Permit Holder's appointed RPA/RWA. Furthermore, the proposed method of sampling and remediation and its implementation must be consistent with the application of BAT and achieve compliance with the conditions stipulated in Permit Holder's Environmental Permit.

The Permit Holder will inform the EA in writing within the period of notice required of any intention to change the name of the Permit Holder, to cease to occupy the premises or to cease to accumulate and dispose of radioactive waste.

The Permit Holder will forward an application to surrender the Permit upon the completion of the sampling and remediation works once works have been completed and the appropriate evidence to that effect has been generated. The Permit Holder's appointed Radioactive Waste Adviser (RWA) will review all evidence of sampling and remediation and advise accordingly.

### 3 EPR Permit

The Permit Holder has been issued with an Environmental Permit by the EA (Table 1), as the enforcing authority for EPR16, in relation to the former RAF Bowerhill station, Lancaster Road, Bowerhill, Melksham, Wilts, SN12 6SS. Details of the Permit are presented in the table below. This Permit remains valid until it is formally revoked in writing by the EA.

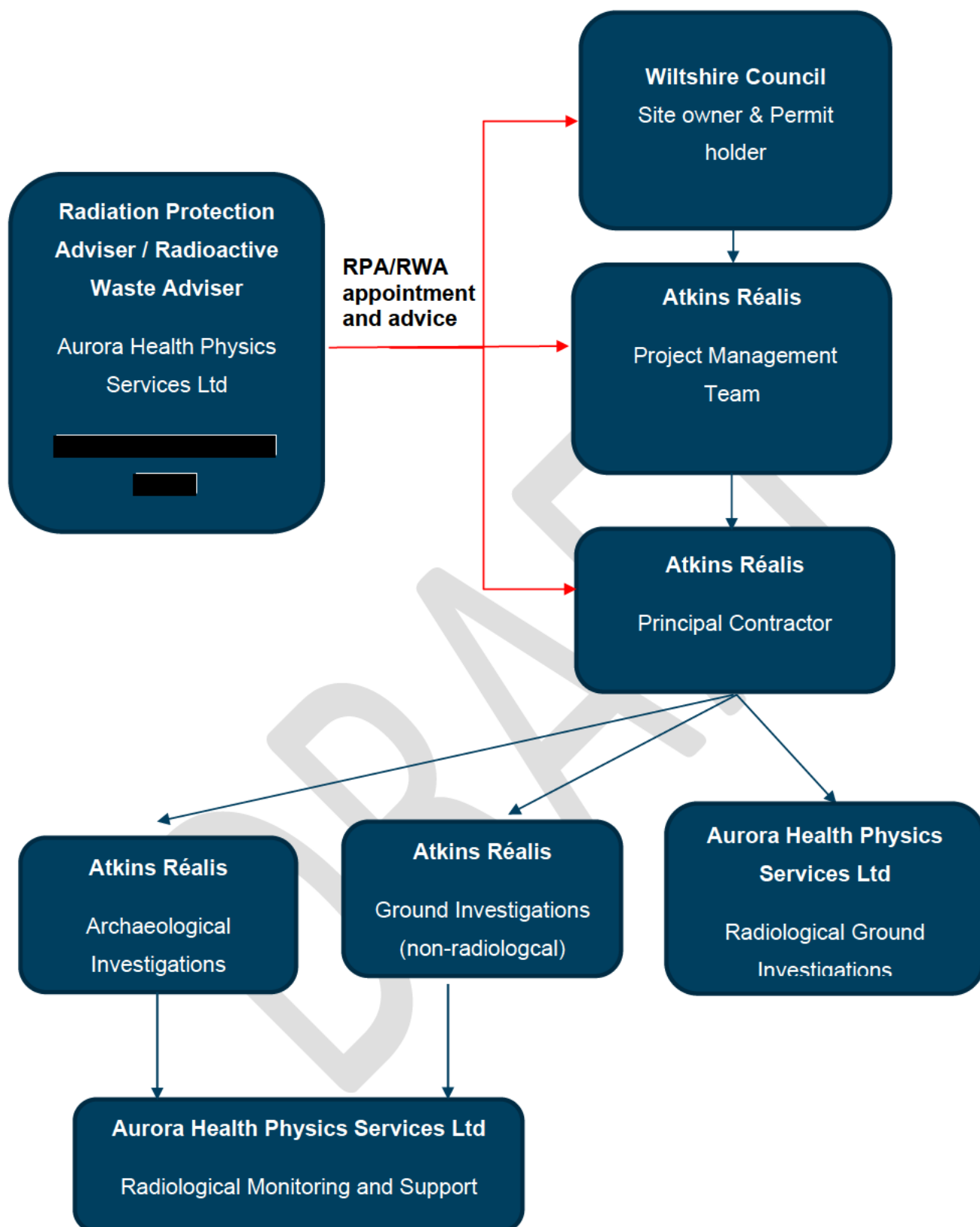
**Table 1. Details of Radioactive Substances Environmental Permit**

Current Permit Issued Under EPR	Reference
Authorisation to accumulate and dispose of radioactive waste	EPR/XXXXX

### 4 Management Structure

Figure 1, below, sets out an organogram of the management structure during the radiological remediation. Key roles for the administration of EPR compliance are indicated including the individuals with overall management responsibility for ensuring Permit compliance.

Note that details of the supporting contractors may change during the project, however, the Permit Holder will ensure that any contractor appointed is suitably qualified and experienced to undertake the required role.



**Figure 1. Organogram of the management and advice structure for radiological works.**

The Permit Holder will ensure that appropriate financial resources will be made available to fund any expenditure necessary to secure compliance with legislative requirements and to ensure that the environmental impact of the organisation's work with radioactive waste is minimised through the application of BAT.





The Permit Holder will take advice from its own appointed RPA/RWA regarding the requirements to accumulate and dispose of radioactive waste in compliance with Permit conditions and will liaise with the Principal Contractor to ensure that the advice is being implemented.

The Principal Contractor will have day to day responsibility for the supervision and control of the work activities resulting in the accumulation and disposal of radioactive waste and will provide the Permit Holder with information and records, as specified in writing. Managerial responsibility for achieving compliance with Permit conditions is retained by the Permit Holder.

All individuals carrying out work with ionising radiation will receive suitable training in accordance with the requirements of IRR17; this training will also cover the waste requirements and the importance of ensuring compliance with the Permit conditions.

## **7 Security of Waste**

The Principal Contractor will provide a secure area on site for the storage of radioactive waste, this store will be managed during routine operations by the Principal Contractor. In order to access the waste accumulation area, visitors are required to contact the Principal Contractor. Where visitors to the site require access to any radiologically designated or radiologically contaminated areas of the site then they will be supervised by a nominated person and will take instruction from the Radiation Protection Supervisor (RPS) or their designate.

Excavated radioactive wastes will be stored in a secure area on site.

If it is found that the security has been breached and that any radioactive waste has been lost or stolen, the relevant contingency plans will be implemented. The Principal Contractor will immediately, upon discovering such an incident, notify the Permit Holder who will in turn notify the EA. This initial notification will be followed up in writing.

### **7.1 Radioactive Waste Store**

During the sampling and remediation work, solid waste which is categorised low level waste (LLW) will be loaded into drums or bulk bags, and these will be placed into a secure area. The secure area will be an ISO container or compound formed by Heras fencing. The area, the drums and the bags will be clearly and legibly marked with the word 'Radioactive' and with the ionising radiation trefoil symbol complying with BS EN ISO 361.

Wastes generated will consist of contaminated soil, rubble and potentially radium dials/items associated with historic luminising activities. The secure area store will be fenced off and secured at night and when not in operational use. Wastes identified as being below the agreed remediation endpoint criteria or being out of scope of EA will be reused or disposed of outside the scope of the Permit.

Waste sorting processes will be reviewed against the need to segregate whilst minimising the spread of contamination and the generation of secondary wastes.

## 8 Production and Minimisation of Waste

Waste is produced as a consequence of the remediation of radioactively contaminated land. It is considered that there is no reasonably practicable treatment or process that could be used to further minimise the volume or activity of soil contaminated wastes.

Application of BAT therefore is grounded in ensuring that:

- plant, equipment and facilities are constructed so as to be readily decontaminated;
- no unauthorised radioactive discharges are made to the surrounding environment;
- contaminated wastes are not mixed with clean uncontaminated materials;
- wastes are only disposed of via Permitted or authorised routes;
- waste volumes and activities are with Permit limits;
- wastes are kept secure pending disposal;
- creation of secondary wastes is kept to a minimum; and
- waste accumulation and disposal activities are carried out by authorised personnel with appropriate records begin created and retained.

The systems, equipment and procedures provided to meet the above requirements will be reviewed by the Permit Holder's RPA/RWA who will advise on any alterations to processes and facilities. Any changes to the waste sorting or categorisation processes must be agreed with the Permit Holder's RPA/RWA prior to the changes being undertaken.

Contingency plans will include details of what to do in the event of an incident that has or could lead to the loss of control of stored/accumulated radioactive wastes or the release of such waste from site. Contingency plans will be detailed within local rules in compliance with the requirements of IRR17.

The Permit Holder will contact the EA, after consultation with the Permit Holder's RWA, should it be discovered that there has been a failure in achieving compliance with the Permit conditions. Actions will be taken immediately upon the realisation of compliance failure, so far as is reasonably practicable, to correct the situation.

## 9 Radioactive Waste

No radioactive waste is to be accumulated or disposed of in gaseous or aqueous form.

### 9.1 Solid Waste Accumulation

Waste activities will be assessed using a combination of in-situ measurements and laboratory analysis.

Soil wastes, following segregation, will be sorted into secure bulk bags (capacity 1 m<sup>3</sup> each) or steel drums (capacity 200 litres each). Other containers (such as 30 or 60 litre drums) may be used dependent upon the Conditions for Acceptance (CFA) of the final waste recipient.

All assessed wastes will be identified and assigned a unique ID with details of the radionuclides, activity concentrations and any other information required by the waste recipient such as chemical contaminants present.

## **9.2 Waste Disposal**

Waste disposal activities will be carried out to ensure that the waste is disposed of to the most appropriate waste recipient for the type and volume of waste with account being taken of the financial impact of these activities alongside the environmental impact of the disposal.

Where this requires further waste segregation activities to achieve this then these will be carried out in compliance with the Permit conditions.

## **10 Best Available Techniques (BAT)**

### **10.1 BAT Declaration & Reviews**

The Permit Holder is committed to the implementation of Best Available Techniques (BAT) as applied to the sampling and remediation of the contaminated land at former RAF Bowerhill station, Lancaster Road, Bowerhill, Melksham, Wilts, SN12 6SS and the advice of the RPA/RWA will always be sought with respect to this. (See reference: WILT/MEL/RSR/BAT).



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# **Permit Boundary for Application RSR-A for Wiltshire Council for RAF Bowerhill station, Lancaster Road, Bowerhill, Melksham, Wilts, SN12 6SS**



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**Reference:** WILT/MEL/RSR/MAP

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ولشائر کونسل (Wiltshire Council) کی سروسز کے بارے معلومات دوسری طرزوں میں فراہم کی جاسکتی ہیں (جیسے کہ بڑی چھپائی یا آڈیو ہے) اور درخواست کرنے پر دوسری زبانوں میں فراہم کی جاسکتی ہیں۔ براہ کرم کونسل سے 0300 456 0100 پر رابطہ کریں، ٹیکسٹ فون سے (01225) 712500 پر رابطہ کریں یا [customerservices@wiltshire.gov.uk](mailto:customerservices@wiltshire.gov.uk) پر ای میل بھیجیں۔

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# Application for an environmental permit

## Form RSR-B4 – New or varied bespoke radioactive substances activity permit (unsealed sources and waste from unsealed sources)



### Read through this form and the RSR-B4 guidance notes before you fill it in.

It should take less than two hours to fill in this application form.

If you are applying for a new bespoke permit for a radioactive substances activity involving unsealed sources and/or radioactive waste from unsealed sources on a non-nuclear site, fill in this form, together with forms RSR-A and RSR-F. Unsealed sources are sometimes known as open sources. If you also want to make on-site disposals of solid waste to land, also fill in form RSR-B5. If you need a permit to store radioactive materials in transit, complete form RSR-B2.

Only fill in the sections relevant to your application. If you are applying to vary (change) an existing permit for unsealed sources and/or radioactive waste you should only fill in the sections which cover the changes you are seeking.

For security reasons, do not refer to sealed sources on this part of the form. There is a separate form (RSR-B2) for radioactive substances activities involving sealed sources.

#### Contents

- 1 Other applications
- 2 About the activities
- 3 Using unsealed sources on the premises
- 4 Radioactive waste
- 5 Accumulation of radioactive waste from unsealed sources
- 6 Radioactive waste disposal
- 7 Transfer of radioactive waste to another person
- 8 Receipt of waste
- 9 Use of mobile radioactive apparatus in the form of unsealed sources
- 10 How to contact us

## 1 Other applications

1a Is this an application for:

New permit (i.e. you don't currently have an RSR unsealed source permit)

Variation to an existing unsealed source permit

Please give the permit number:

\_\_\_\_\_

Note – You cannot vary a standard rules permit.

1b Have you recently made, or do you intend to make, an application for an environmental permit to operate a regulated facility, other than for a radioactive substances activity, on the premises?

No

Yes

## 2 About the activities

**2a** Tick the relevant boxes to show which radioactive substances activities you are applying for.

Schedule 23 Part 2 paragraph reference	Description	
11(2)(a)	Keep or use radioactive material on premises used for the purposes of an undertaking	
11(2)(b)	Dispose of radioactive waste on or from premises used for the purposes of an undertaking	
11(2)(c)	Accumulate radioactive waste on or from premises used for the purposes of an undertaking	
11(4)(a)	Receive radioactive waste for the purposes of disposing of it	
11(5)(a)	Keep or use mobile radioactive apparatus for testing, measuring or otherwise investigating any of the characteristics of substances or articles	
11(5)(b)	Keep or use mobile radioactive apparatus for releasing quantities of radioactive material into the environment or introducing such material into organisms	

**2b** Describe your reasons for keeping, using, accumulating or disposing of unsealed sources.

**2c** If you are applying to vary an existing permit describe the changes you are seeking and the reasons for them.

**2d** Describe how and why you intend to use the unsealed sources.

## 2 About the activities, continued

2e Where and how will you store the unsealed sources when they are not in use?

--

## 3 Using unsealed sources on the premises

Only answer this section if you are applying for an activity described in Schedule 23, Part 2, paragraph 11(2)(a), 11(5)(a) or 11(5)(b) involving unsealed sources. For mobile radioactive apparatus in the form of unsealed sources, see question 9.

3a Give details of the unsealed sources that you will keep or use on the premises.

Radionuclide (you may use the groups of radionuclides specified in the guidance document for this part of the form)	Maximum activity at any one time (in becquerels)

## 4 Radioactive waste

You may use the groups of radionuclides specified in the guidance document for this part of the form.

4a Enclose your assessment of how you plan to use the ‘best available techniques’ to reduce the amount of radioactive waste you create and have to dispose of.

Document reference

\_\_\_\_\_



## **4 Radioactive waste, continued**

**4b** Do you have an emergency role under the National Arrangements for Incidents Involving Radioactivity (NAIR) or RADSAFE schemes?

No

Yes

**4c** Do you want us to include the standard conditions for organisations taking part in NAIR or RADSAFE on this permit?

No

Yes

## **5 Accumulation of radioactive waste from unsealed sources**

**5a** Why do you plan to accumulate radioactive waste?

**5b** How do you plan to accumulate radioactive waste?

**5c** Give the chemical and physical details of the radioactive waste.

**5d** How will you measure the activity of all the types of radioactive waste?

**5 Accumulation of radioactive waste from unsealed sources, continued****5e** Give the following details of the gaseous waste you will accumulate.

Radionuclides or groups of radionuclides	Activity limit	Volume limit	Period limit

**5f** Give the following details of the aqueous liquid waste you will accumulate.

Radionuclides or groups of radionuclides	Activity limit	Volume limit	Period limit

**5g** Give the following details of the organic liquid waste you will accumulate.

Radionuclides or groups of radionuclides	Activity limit	Volume limit	Period limit

**5h** Give the following details of the very low-level waste (VLLW) you will accumulate.

Cubic metres	Maximum period

If you plan to accumulate the VLLW for more than two weeks before you dispose of it, tell us why you need the extra time.

--

## 5 Accumulation of radioactive waste from unsealed sources, continued

5i Give the following details of low-level solid waste (other than VLLW) you will accumulate.

Radionuclides or groups of radionuclides	Activity limit	Volume limit	Period limit

## 6 Radioactive waste disposal

Note that the guidance for part RSR-B4 is especially important for this section. This section covers the types of radioactive waste specified below. Tick all relevant boxes:

Gaseous waste

Aqueous waste

Solid waste to be incinerated on the premises

Liquid waste to be incinerated on the premises

6a Provide a description of your arrangements for disposing of radioactive waste by the above means.

Document reference

\_\_\_\_\_

See guidance notes.

## Discharge of radioactive gas or aqueous liquid and incineration of waste on the premises

6b Indicate which discharge points or routes you plan to use.

Tick all relevant boxes:

A chimney

A fume cupboard vent

Other gaseous discharge

An incinerator stack

A public sewer

A river or stream

A lake, pond or reservoir

An estuary

The sea

Your own sewage treatment works

Other aqueous disposal

6c Provide your assessment of the risk of radiation from the waste you plan to discharge.

Document reference

\_\_\_\_\_

## 6 Radioactive waste disposal, continued

**6d** Only answer this question if your activity can be described as one of the operations in the Transboundary Radioactive Contamination Direction (England) 2020 and you meet the criteria for providing a transboundary radiation dose assessment as described in the RSR-B4 guidance notes.

If required, provide a prospective dose assessment for the most exposed members of the public in Member States of the European Union and/or Norway.

Document reference

\_\_\_\_\_

**6e** State the limits you need for discharge of gaseous waste to air.

Disposal outlet ref	Radionuclides or group	Annual limit	Daily limit

**6f** State the limits you need for discharge of aqueous waste to sewer or water.

Disposal outlet ref	Radionuclides or group	Annual limit	Daily limit

### Disposal of waste by incineration on the premises

**6g** What type(s) of incinerator do you have on the premises?

**6 Radioactive waste disposal, continued****6h** What will you do if your incinerator breaks down?

--

**6i** Give the following details of solid waste you will incinerate.

Radionuclides	Monthly limit	Daily limit

**6j** Give the following details of organic liquid waste you will incinerate.

Radionuclides	Monthly limit	Daily limit

**Disposal of organic liquid or solid waste by other means****6k** Describe any other method you intend to use to dispose of liquid organic or solid waste.

Attach your description and radiological assessment.

Document reference

--

## 7 Transfer of waste to another person

This section covers the types of radioactive waste specified below. You do not need to include any radioactive waste that you intend to dispose of under an exemption

Tick all relevant boxes:

Solid waste

Organic liquid waste

Aqueous liquid waste

Very low-level waste (where not exempt)

**7a** Provide a description of your arrangements for transferring radioactive waste to another person.

Document reference

\_\_\_\_\_

See guidance notes.

### Solid waste and organic or aqueous liquid waste

**7b** Give the following details of your plans to transfer solid waste (excluding exempt waste).

Specified waste type	Person to whom transfer will be made	Purpose of transfer	Radionuclides or group	Annual limit
Solid waste				
Solid waste				
Solid waste				
Solid waste				

**7c** Give the following details of your plans to transfer organic or aqueous liquid waste.

Specified waste type	Person to whom transfer will be made	Purpose of transfer	Radionuclides or group	Annual limit
Organic/aqueous* liquid waste				
Organic/aqueous* liquid waste				
Organic/aqueous* liquid waste				
Organic/aqueous* liquid waste				

\*Delete as appropriate

## 7 Transfer of waste to another person, continued

7d Confirm whether you have contracts in place for another organisation to receive all your organic liquid and solid waste, and any aqueous liquid waste, that you intend to dispose by transfer

Yes

No

7e Describe contingency arrangements should your planned transfer routes for liquid or solid waste become unavailable.

7f Do you intend to transfer solid waste to a landfill site?

Yes

No

Provide details of your proposals

## Disposal of very low-level waste (VLLW)

Fill in this section only if the disposal of VLLW will not be exempt – see guidance.

7g. Tell us how you plan to dispose of the VLLW.

Give details below



## 8 Receipt of waste

- 8a** Provide details of the origin, nature and quantity of waste from unsealed sources to be accepted onto the premises, and how you will manage and dispose of it.

Do not answer this question if the only radioactive waste that you will receive from elsewhere is that which may arise as a result of your participation in NAIR or RADSAFE.

Document reference

\_\_\_\_\_

## 9 Use of mobile radioactive apparatus in the form of unsealed sources

Only answer this question if you are applying for an activity described in Schedule 23, Part 2, paragraph 11(5)(a) or 11(5)(b).

- 9a** Fill in the table below with details of the radioactive material that you will use in mobile form.

Radionuclides	Maximum amount <sup>1</sup>	Maximum daily release

1 This is the total radioactivity of the specified radionuclide to be used for the environmental study.

- 9b** Where will the mobile radioactive apparatus be used (address or Ordnance Survey map reference if none)?

- 9c** Is it within a 5 km radius of any environmentally sensitive site?

For example, an SSSI, SAC or SPA.

No

Yes Please give details.

## 9 Use of mobile radioactive apparatus in the form of unsealed sources, continued

9d What is the size of the area where the radioactivity is to be used?

9e Which council or unitary authority is the area in?

9f How long will the source be used for?

9g Give the frequency of use over the period.

9h Will the use release radioactive materials into the environment?

No

Yes

9i What measures will be in place to avoid human or animal contact with the radioactive materials when being used?

## 9 Use of mobile radioactive apparatus in the form of unsealed sources, continued

- 9j Provide your assessment of the risk of radiation from the use of mobile radioactive apparatus to release radioactivity to the environment.

Document reference

\_\_\_\_\_

Now fill in part RSR-F.

## 10 How to contact us

Please send all parts of your filled-in application form and supporting documents to our Radioactive Substances Regulation Permit Support Team as described in form RSR Part-F.

### Support:

If you need help filling in this form, please contact the person who sent it to you or contact us using the methods described in Part RSR-F, which is available at:

Application for a RSR environmental permit: part RSR-F – GOV.UK ([www.gov.uk](http://www.gov.uk))

If you are happy with our service, please tell us. It helps us to identify good practice and encourages our staff. If you're not happy with our service, please tell us how we can improve it.

### Feedback

(You don't have to answer this part of the form, but it will help us improve our forms if you do.)

We want to make our forms easy to fill in and our guidance notes easy to understand. Please use the space below to give us any comments about this form or the guidance notes that came with it.

How long did it take you to fill in this form?

\_\_\_\_\_

We will use your feedback to improve our forms and guidance notes, and to tell the Government how regulations could be made simpler.

Would you like a reply to your feedback?

Yes please

No thank you

**Please tell us if you need information in a different language or format (for example, in large print) so we can keep in touch with you more easily.**

## 10 How to contact us, continued

### For Environment Agency use only

Date received (DD/MM/YYYY)

\_\_\_\_\_

Our reference number

\_\_\_\_\_

Payment received?

No

Yes

Amount received

£ \_\_\_\_\_

## Teresa Strange

---

**From:** Neil Martin <neil.martin@environment-agency.gov.uk>  
**Sent:** 13 June 2025 13:57  
**To:** Teresa Strange  
**Subject:** Permit application EPR/SB3455TZ/A001 Former RAF Bowerhill  
**Attachments:** Application Bespoke A001 Site Plan-230525.pdf; Application Bespoke A001- Forms RSR PART B4-230525.pdf; Application Bespoke A001 - (11.06.2025) - additional Information Document WILT-MEL-RSR-001\_Redacted.pdf; Application Bespoke A001 Forms-230525 Compliance Management Document WILT-MEL-RSR-CMD\_Redacted.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Teresa

Thank you for taking the time to meet to discuss the above application. I am looking at linking the Gov.UK permit advert to Citizen Space, but in the meantime and in case I can't arrange it for this application, I attach the key application documents for your reference. If you have any questions please get in touch with me direct and, at least for now, if you have any formal response to the application please send to [RSR.Rotherham2.NE@environment-agency.gov.uk](mailto:RSR.Rotherham2.NE@environment-agency.gov.uk).

Regards

Neil Martin RWCA, MSRP

Radioactive Substances Regulation Senior Officer

**Environment Agency** | Goldcrest House, Alice Holt, Farnham, Surrey, GU10 4LQ

[neil.martin@environment-agency.gov.uk](mailto:neil.martin@environment-agency.gov.uk)

External: 0203 025 9717

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## Fiona Dey

---

**From:** Cary, Louise <Louise.Cary@wiltshire.gov.uk>  
**Sent:** 20 June 2025 07:23  
**To:** Teresa Strange  
**Cc:** nick.holder@wiltshire.gov.uk; Fiona Dey; John Glover  
**Subject:** RE: Permit application EPR/SB3455TZ/A001 Former RAF Bowerhill

Hi Teresa

I hope you are enjoying your holiday. As promised a response to your queries and concerns.

The radiation survey and subsequent requirements to apply for a permit before undertaking further ground investigations are routine activity for a project of this nature. As noted in the email containing our press statement that we sent to you on Tuesday, the elevated levels are absolutely minimal: if a person was to sit for one hour every week for a whole year in the spot with the highest levels they would get the same radiation exposure as having a single dental x-ray.

Regarding dog walkers accessing the site, they should not be doing so. The land was fenced off, but following a site visit a couple of weeks ago it appears that the fencing has been removed again. There is no risk to people using the site as long as the land is not disturbed in any way. However, it would be helpful if you could communicate that the land should not be used.

Surveys have only been undertaken in relation to the central depot development on the former golf course land and Christie Miller site. The developer to the north of the site would be responsible for undertaking any due diligence on their land, as would the Parish Council should you wish to develop the Bowerhill Sports Field. I do not know the extent to which the former RAF base was operating on land at Bowerhill, so you may wish to investigate this further.

I trust that helps to alleviate any concerns.

Kind regards

Louise

**Louise Cary**  
**Head of Capital Projects**  
Assets



Tel: 01722 434274  
Internal: 54274

Email: [louise.cary@wiltshire.gov.uk](mailto:louise.cary@wiltshire.gov.uk)  
Website: [www.wiltshire.gov.uk](http://www.wiltshire.gov.uk)

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**From:** Cary, Louise  
**Sent:** 17 June 2025 11:45  
**To:** Teresa Strange <clerk@melkshamwithout-pc.gov.uk>

**Cc:** Holder, Nick <Nick.Holder@wiltshire.gov.uk>; Fiona Dey <office@melkshamwithout-pc.gov.uk>; John Glover <john.glover@melkshamwithout-pc.gov.uk>

**Subject:** RE: Permit application EPR/SB3455TZ/A001 Former RAF Bowerhill

Hi Teresa

I'm good thanks, hope you are too.

Thank you for your email. I will come back to you with a response to your queries before you need to issue anything for your agenda.

Kind regards

Louise

**Louise Cary**  
**Head of Capital Projects**  
Assets



Tel: 01722 434274

Internal: 54274

Email: [louise.cary@wiltshire.gov.uk](mailto:louise.cary@wiltshire.gov.uk)

Website: [www.wiltshire.gov.uk](http://www.wiltshire.gov.uk)

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**From:** Teresa Strange <[clerk@melkshamwithout-pc.gov.uk](mailto:clerk@melkshamwithout-pc.gov.uk)>

**Sent:** 17 June 2025 11:01

**To:** Cary, Louise <[Louise.Cary@wiltshire.gov.uk](mailto:Louise.Cary@wiltshire.gov.uk)>

**Cc:** Holder, Nick <[Nick.Holder@wiltshire.gov.uk](mailto:Nick.Holder@wiltshire.gov.uk)>; Fiona Dey <[office@melkshamwithout-pc.gov.uk](mailto:office@melkshamwithout-pc.gov.uk)>; John Glover <[john.glover@melkshamwithout-pc.gov.uk](mailto:john.glover@melkshamwithout-pc.gov.uk)>

**Subject:** Fw: Permit application EPR/SB3455TZ/A001 Former RAF Bowerhill

Hi Louise,

I hope that you're well. I wanted to get in touch with you following conversations I've had with the Environment Agency about the permit application (EPR/SB3455TZ/A001) they have for the removal of historic radioactive waste from the golf course behind Christie Miller on Bowerhill Industrial Estate. It was brought to our attention by a resident (so it is in the public domain) and it's published on the EA website, with more details added yesterday <https://www.gov.uk/government/publications/sn12-6ss-wiltshire-council-environmental-permit-application-advertisement-eprsb3455tza001/sn12-6ss-wiltshire-council-environmental-permit-application-advertisement-eprsb3455tza001>].

I contacted the EA and spoke with the officer who then sent the information in the email trail below. Two things:

Firstly, I feel quite strongly that it's Wiltshire Council that should be putting out communications about the work that is planned. As you are aware, residents use the golf course for dog walking and possibly have continued to do so even with it being fenced off. There is obviously a careful balance that needs to be managed between letting residents know, so that they're not going too close,



without worrying them seeing signs about radioactive waste, and obviously not letting those with bad intentions too aware of what's going on.

When Christie Miller was demolished and the asbestos dust management plan was considered, the Parish Council did raise concerns to sensitive receptors who are the children's pre-school nursery on the other side of road from Christie Miller and 100s of children who play for Future of Football on the Bowerhill Sports Field.

Secondly, was the search just on the golf course land or anything wider in RAF Bowerhill? Are there concerns about anywhere else on RAF Bowerhill? I'm thinking, at the moment, of potential work which might happen on Bowerhill Sports Field which was transferred from Wiltshire Council to the Parish Council a few years ago. We are in early discussions about a potential 3G pitch and enlarged carpark on that field, which would involve digging up the ground. Also, Barratt Homes are just about to submit their Reserved Matters application for 210 houses and a care home on the other side, Land South of Western Way (PL/2022/08504).

I am planning on putting this on the agenda for Monday 30th June which is the Parish Council's next planning committee meeting. The agenda will go out early next week. I am on holiday but if you are able to send something back by email (rather than being able to talk on the phone), I would be grateful to understand how much we put in the public domain when the Parish Council meet next week. As it is a permit application and the Parish Council will want to make a comment before the deadline on the 1st of July.

With many thanks  
Teresa

Teresa Strange  
Clerk  
Melksham WI

---

**From:** Neil Martin <[neil.martin@environment-agency.gov.uk](mailto:neil.martin@environment-agency.gov.uk)>  
**Sent:** Friday, June 13, 2025 13:57  
**To:** Teresa Strange <[clerk@melkshamwithout-pc.gov.uk](mailto:clerk@melkshamwithout-pc.gov.uk)>  
**Subject:** Permit application EPR/SB3455TZ/A001 Former RAF Bowerhill

Teresa

Thank you for taking the time to meet to discuss the above application. I am looking at linking the Gov.UK permit advert to Citizen Space, but in the meantime and in case I can't arrange it for this application, I attach the key application documents for your reference. If you have any questions please get in touch with me direct and, at least for now, if you have any formal response to the application please send to [RSR.Rotherham2.NE@environment-agency.gov.uk](mailto:RSR.Rotherham2.NE@environment-agency.gov.uk).

Regards  
Neil Martin RWCA, MSRP  
Radioactive Substances Regulation Senior Officer  
**Environment Agency** | Goldcrest House, Alice Holt, Farnham, Surrey, GU10 4LQ

[neil.martin@environment-agency.gov.uk](mailto:neil.martin@environment-agency.gov.uk)  
External: 0203 025 9717

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## Fiona Dey

---

**From:** Perrett, David <David.Perrett@wiltshire.gov.uk>  
**Sent:** 17 June 2025 15:23  
**To:** Fiona Dey  
**Cc:** Teresa Strange; nick.holder@wiltshire.gov.uk; John Glover; Ashdown, David; Dickerson, Kirsty; Cary, Louise  
**Subject:** RE: Permit application EPR/SB3455TZ/A001 Former RAF Bowerhill  
**Categories:** Planning Lists

Hi Fiona,  
For your information, please see the statement below that we have sent to both the Melksham News and Wiltshire Times. I hope this is helpful.

Cllr Helen Belcher OBE, Cabinet Member for Economic Development, Regeneration and Assets, said, "As part of our plans for a new central area depot in Bowerhill, we have been carrying out environmental surveys on the site.

"Following a non-intrusive walkover survey, our contractors identified radiation dose rates that were slightly higher than the normal background dose rates expected in the UK. Although there were found to be higher dose rates, there is no elevated risk to the general public who may have accessed the site in the past, or in association with the current use of the land, as long as the land is not disturbed.

"We have now applied for an Environment Agency permit so that we can further assess the areas with a higher dose rate in advance of completing the required ground investigations and archaeological works on the site.

"This work will help us to finalise detailed designs ahead of the submission of a planning application.

"If that application is successful, we would look to start work on site in 2026."

### **Notes to editors:**

The contractor has confirmed that there is no elevated risk to the general public who may have accessed the site in the past, and gave a comparison as an example of the radiation dose: If a person was to **sit** for one hour every week for a whole year in the spot with the highest levels they would get the same radiation exposure as having a single dental x-ray.

Kind regards

**David Perrett**  
**Communications Business Partner - Place**  
Customer and Communications

**Wiltshire Council**

Tel: 01225 718519

Email: [david.perrett@wiltshire.gov.uk](mailto:david.perrett@wiltshire.gov.uk)

Web: [www.wiltshire.gov.uk](http://www.wiltshire.gov.uk)



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**From:** Cary, Louise <Louise.Cary@wiltshire.gov.uk>  
**Sent:** 17 June 2025 15:14  
**To:** Fiona Dey <office@melkshamwithout-pc.gov.uk>  
**Cc:** Teresa Strange <clerk@melkshamwithout-pc.gov.uk>; Holder, Nick <Nick.Holder@wiltshire.gov.uk>; John Glover <john.glover@melkshamwithout-pc.gov.uk>  
**Subject:** RE: Permit application EPR/SB3455TZ/A001 Former RAF Bowerhill

Thanks Fiona

Melksham News have been in contact with our Comms teams but thank you for the heads up.

Kind regards

Louise

---

**From:** Fiona Dey <[office@melkshamwithout-pc.gov.uk](mailto:office@melkshamwithout-pc.gov.uk)>  
**Sent:** 17 June 2025 15:10  
**To:** Cary, Louise <[Louise.Cary@wiltshire.gov.uk](mailto:Louise.Cary@wiltshire.gov.uk)>  
**Cc:** Teresa Strange <[clerk@melkshamwithout-pc.gov.uk](mailto:clerk@melkshamwithout-pc.gov.uk)>; Holder, Nick <[Nick.Holder@wiltshire.gov.uk](mailto:Nick.Holder@wiltshire.gov.uk)>; John Glover <[john.glover@melkshamwithout-pc.gov.uk](mailto:john.glover@melkshamwithout-pc.gov.uk)>  
**Subject:** FW: Permit application EPR/SB3455TZ/A001 Former RAF Bowerhill

You don't often get email from [office@melkshamwithout-pc.gov.uk](mailto:office@melkshamwithout-pc.gov.uk). [Learn why this is important](#)

Hi Louise,

Thank you for your previous response to Teresa. Please be aware that Melksham News are now chasing this story so any information that you are able to share sooner would be very helpful.

Many thanks  
Fiona

---

**From:** Fiona Dey  
**Sent:** 17 June 2025 11:38  
**To:** [louise.cary@wiltshire.gov.uk](mailto:louise.cary@wiltshire.gov.uk)  
**Cc:** Teresa Strange <[clerk@melkshamwithout-pc.gov.uk](mailto:clerk@melkshamwithout-pc.gov.uk)>; Nick Holder <[nick.holder@melkshamwithout.co.uk](mailto:nick.holder@melkshamwithout.co.uk)>  
**Subject:** FW: Permit application EPR/SB3455TZ/A001 Former RAF Bowerhill

Dear Louise,

Following on from Teresa's email, she has asked me to make you aware the Wiltshire Times article which we have just been made aware of.

<https://www.wiltshiretimes.co.uk/news/25234673.radioactive-contamination-found-former-raf-bowerhill/>

Kind regards  
Fiona  
Fiona Dey  
Parish Officer  
Melksham Without Parish Council

First Floor  
Melksham Community Campus  
Market Place, Melksham  
Wiltshire, SN12 6ES  
01225 705700  
[office@melkshamwithout-pc.gov.uk](mailto:office@melkshamwithout-pc.gov.uk)  
[www.melkshamwithout-pc.gov.uk](http://www.melkshamwithout-pc.gov.uk)

---

**From:** Teresa Strange <[clerk@melkshamwithout-pc.gov.uk](mailto:clerk@melkshamwithout-pc.gov.uk)>  
**Sent:** 17 June 2025 11:01  
**To:** Cary, Louise <[louise.cary@wiltshire.gov.uk](mailto:louise.cary@wiltshire.gov.uk)>  
**Cc:** [nick.holder@wiltshire.gov.uk](mailto:nick.holder@wiltshire.gov.uk); Fiona Dey <[office@melkshamwithout-pc.gov.uk](mailto:office@melkshamwithout-pc.gov.uk)>; John Glover <[john.glover@melkshamwithout-pc.gov.uk](mailto:john.glover@melkshamwithout-pc.gov.uk)>  
**Subject:** Fw: Permit application EPR/SB3455TZ/A001 Former RAF Bowerhill

Hi Louise,

I hope that you're well. I wanted to get in touch with you following conversations I've had with the Environment Agency about the permit application (EPR/SB3455TZ/A001) they have for the removal of historic radioactive waste from the golf course behind Christie Miller on Bowerhill Industrial Estate. It was brought to our attention by a resident (so it is in the public domain) and it's published on the EA website, with more details added yesterday <https://www.gov.uk/government/publications/sn12-6ss-wiltshire-council-environmental-permit-application-advertisement-eprsb3455tza001/sn12-6ss-wiltshire-council-environmental-permit-application-advertisement-eprsb3455tza001>].

I contacted the EA and spoke with the officer who then sent the information in the email trail below. Two things:

Firstly, I feel quite strongly that it's Wiltshire Council that should be putting out communications about the work that is planned. As you are aware, residents use the golf course for dog walking and possibly have continued to do so even with it being fenced off. There is obviously a careful balance that needs to be managed between letting residents know, so that they're not going too close, without worrying them seeing signs about radioactive waste, and obviously not letting those with bad intentions too aware of what's going on.

When Christie Miller was demolished and the asbestos dust management plan was considered, the Parish Council did raise concerns to sensitive receptors who are the children's pre-school nursery on the other side of road from Christie Miller and 100s of children who play for Future of Football on the Bowerhill Sports Field.

Secondly, was the search just on the golf course land or anything wider in RAF Bowerhill? Are there concerns about anywhere else on RAF Bowerhill? I'm thinking, at the moment, of potential work which might happen on Bowerhill Sports Field which was transferred from Wiltshire Council to the Parish Council a few years ago. We are in early discussions about a potential 3G pitch and enlarged carpark on that field, which would involve digging up the ground. Also, Barratt Homes are just about to submit their Reserved Matters application for 210 houses and a care home on the other side, Land South of Western Way (PL/2022/08504).

I am planning on putting this on the agenda for Monday 30th June which is the Parish Council's next planning committee meeting. The agenda will go out early next week. I am on holiday but if you are

able to send something back by email (rather than being able to talk on the phone), I would be grateful to understand how much we put in the public domain when the Parish Council meet next week. As it is a permit application and the Parish Council will want to make a comment before the deadline on the 1st of July.

With many thanks  
Teresa

Teresa Strange  
Clerk  
Melksham WI

---

**From:** Neil Martin <[neil.martin@environment-agency.gov.uk](mailto:neil.martin@environment-agency.gov.uk)>  
**Sent:** Friday, June 13, 2025 13:57  
**To:** Teresa Strange <[clerk@melkshamwithout-pc.gov.uk](mailto:clerk@melkshamwithout-pc.gov.uk)>  
**Subject:** Permit application EPR/SB3455TZ/A001 Former RAF Bowerhill

Teresa

Thank you for taking the time to meet to discuss the above application. I am looking at linking the Gov.UK permit advert to Citizen Space, but in the meantime and in case I can't arrange it for this application, I attach the key application documents for your reference. If you have any questions please get in touch with me direct and, at least for now, if you have any formal response to the application please send to [RSR.Rotherham2.NE@environment-agency.gov.uk](mailto:RSR.Rotherham2.NE@environment-agency.gov.uk).

Regards  
Neil Martin RWCA, MSRP  
Radioactive Substances Regulation Senior Officer  
**Environment Agency** | Goldcrest House, Alice Holt, Farnham, Surrey, GU10 4LQ

[neil.martin@environment-agency.gov.uk](mailto:neil.martin@environment-agency.gov.uk)  
External: 0203 025 9717

**Working days:** Monday to Friday

[Report an environmental problem - GOV.UK](#)



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## Shock over radioactive contamination secrecy at Christie Miller site

- By Local Democracy Reporter Peter Davison

[June 20, 2025](#)



Wiltshire Council knew about radioactive contamination at a former military base in January – but did nothing to alert the public, papers show.

The secrecy surrounding the discovery has been slammed by the council’s division representative, Nick Holder, who, until May’s election, was a member of the Conservative cabinet.

Last week, the Local Democracy Reporting Service wrote that contractors at the former RAF Melksham base in Bowerhill “identified radiation dose rates that were slightly higher than the normal background dose rates expected in the UK.”

While the council insisted there was “no elevated risk to the general public,” Cllr Holder said he was not told about the find – a move he called “shocking”.

The contamination was found at the former camp gymnasium and cinema, which was housed in a hangar-sized building on the base, which is now owned by Wiltshire Council.

The former Christie Miller sports centre is being demolished and redeveloped by Wiltshire Council as a depot for its highways operations. Contractors had already found asbestos as part of the demolition work.

During the Second World War, radium paint was used on instrument dials so that they could be seen in the dark. Local reports suggest there was an explosion in the paint store, which could be the cause of the contamination.



Papers seen by the Local Democracy Reporting Service say that radiological surveys identified the contamination in January 2025.

But an application by Wiltshire Council for a permit to deal with the contamination was only published by the Environment Agency on 3rd June – the first that elected councillors at both parish and county levels knew about it.

The Local Democracy Reporting Service approached Wiltshire Council for comment on June 9, and an official statement was issued by the authority on 12th June.

The undated papers include a full explanation from Wiltshire Council to the Environment Agency about what exactly has been found, and how the council intends to deal with it.

The papers say: “Radiological surveys undertaken in January 2025 identified locations on the former RAF Melksham site contaminated with Ra-226.

“This is likely due to luminising activities undertaken by the RAF when they used the site as an engineering and instrument school.”

In the papers, Wiltshire Council tells the Environment Agency it intends to employ specialist contractors to remove the “unsealed waste” and “radium contaminated soil, rubble, and artefacts” and put the waste into sealed drums.

The waste would then be incinerated or disposed of at a landfill site near Peterborough, which is permitted to deal with radioactive waste.

The Local Democracy Reporting Service contacted Cllr Holder for comment after it became clear that the council had known about the contamination for up to six months.

Despite holding a cabinet position and sitting on the steering group overseeing the works at the council-owned site, Cllr Holder said he was not informed about the discovery of contaminated material by the council, and only found out when the permit application to the Environment Agency was filed by Wiltshire Council, followed soon after by “reports in the press.”

“I’m concerned that we should find out in such a roundabout way,” he said. “It appears Wiltshire Council was reluctant to go through the normal process of notification.

“It is unacceptable that the public found out about it first through the press.

“What annoys me more than anything is that they’ve known since January. Why weren’t we told?

“Since the discovery, members of the public have had access to the site. People walk their dogs there. Hundreds of kids play football at the nearby playing field. A site nearby is earmarked for new housing.”

Cllr Holder, who said he had been approached by concerned residents since the news became public, said he would be writing to Wiltshire Council officers asking for an explanation, and would be raising the matter with the new Liberal Democrat cabinet at its meeting next Tuesday 24th June.

Cllr Helen Belcher, cabinet member for economic development, regeneration and assets, said: “This is merely a precautionary measure, and these surveys are part of the process that any potential construction site has to go through.

“There is no elevated risk to the public. If a person was to sit for one hour every week for a whole year in the spot with the highest levels, they would get the same radiation exposure as having a

single dental x-ray, and people are likely to receive more radiation by just being in sitting in their homes or taking a single flight to Spain.”

<https://www.wiltshiretimes.co.uk/news/25234673.radioactive-contamination-found-former-raf-bowerhill/>

**Wiltshire Times**

### **Radioactive contamination found at former RAF Bowerhill**

14th June

**Radioactive contamination has been found at a former military airbase in Wiltshire that has been converted into a business and retail park.**

Wiltshire Council confirmed today (Thursday) that contractors at the former RAF Bowerhill base in Melksham "identified radiation dose rates that were slightly higher than the normal background dose rates expected in the UK."

The council insists there is "no elevated risk to the general public," but has applied to the Environment Agency to carry out further investigations.

The contamination was found at the former Christie Miller sports centre – an RAF hangar which has been demolished and is being redeveloped by Wiltshire Council as a depot for its highways operations. Contractors had already found asbestos as part of the demolition work.

The former RAF Bowerhill station was established in 1940 as a base for the RAF School of Instrument Training and, later, the RAF Armament School. The RAF left Bowerhill in the 1970s and in the 1980s the base was redeveloped as an industrial estate.

Finding higher-than-normal levels of radioactivity at former RAF bases is not unknown - and not necessarily associated with weaponry. Luminous paints used in instrument panels can cause radioactive contamination.

Helen Belcher, Wiltshire Council cabinet member for economic development, regeneration and assets, said: "As part of our plans for a new central area depot in Bowerhill, we have been carrying out environmental surveys on the site.

"Following a non-intrusive walkover survey, our contractors identified radiation dose rates that were slightly higher than the normal background dose rates expected in the UK.

"Although there were found to be higher dose rates, there is no elevated risk to the general public who may have accessed the site in the past, or in association with the current use of the land, as long as the land is not disturbed.

"We have now applied for an Environment Agency permit so that we can further assess the areas with a higher dose rate in advance of completing the required ground investigations and archaeological works on the site.

"This work will help us to finalise detailed designs ahead of the submission of a planning application.

"If that application is successful, we would look to start work on site in 2026."

[Radioactive](#)

[RAF](#)

[Wiltshire Council](#)

[Environment](#)

[Local government](#)

[Melksham](#)

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[1 Comment](#)

## View results

Respondent

581

Nick Holder

01:35

Time to complete

## 1. Application Ref: \*

PL/2025/04158

## 2. Site Address: \*

Melksham Football And Rugby Club, Eastern Way, Melksham, SN12 7GU

3. Before making a request for a planning application to be referred to a Planning Committee Members are asked to discuss it with the case officer to ensure that they are aware of all of the relevant considerations and the likely recommendation. This should ensure that only those applications that need to, appear on agendas. (There have been cases where applications have appeared where the officer's recommendation is in line with the Members thoughts).

I have discussed this application with the case officer. \*

☒ Yes☐ No

4. I request this application to be called to committee if the recommendation is for:

☒ Approval☐ Refusal

5. I request that the above mentioned planning application is considered at a meeting of the Planning Committee. I have indicated below the key issues which I consider justify the call in.

☐ Scale of development☒ Visual impact upon the surrounding area☒ Relationship to adjoining properties☐ Design – bulk, height, general appearance☒ Environmental/highway impact☒ Car parking (use)

6. Other (please specify)

Noise and traffic impact on the surrounding area

7. Division Member: \*

Nick Holder

8. Date: \*

16/06/2025



## Fiona Dey

---

**From:** Teresa Strange  
**Sent:** 19 June 2025 10:57  
**To:** Fiona Dey  
**Subject:** Fw: Consultation re. Proposed Battery Energy Storage System (BESS) at land at Halfway House Farm, Beanacre  
**Attachments:** Parish Council - Public Consultation Letter.pdf  
**Categories:** Planning Lists

I havent looked but guess its for planning committee agenda, can you send to all cllrs for info  
Thankyou

---

**From:** Sophie Cattlin <Sophie.Cattlin@energyline.ltd.uk>  
**Sent:** Thursday, June 19, 2025 10:00  
**To:** Teresa Strange <clerk@melkshamwithout-pc.gov.uk>  
**Subject:** Consultation re. Proposed Battery Energy Storage System (BESS) at land at Halfway House Farm, Beanacre

Good Morning,

On behalf of Enray Power, please find enclosed a letter introducing you to a proposed development at land at Halfway House Farm, Beanacre and inviting you to provide any comments and/or questions on the proposed development prior to a formal planning application being submitted.






The proposed development is a Battery Energy Storage System (BESS) Including Associated Infrastructure, Drainage, Cabling, Landscaping and Access.

If you have any questions or queries regarding this, please do not hesitate to contact us at [consultations@energyline.ltd.uk](mailto:consultations@energyline.ltd.uk).

Best wishes

**Sophie Cattlin** MRTPI

Senior Planner

 01423 396140  
 01423 799950  
 [Sophie.Cattlin@energyline.ltd.uk](mailto:Sophie.Cattlin@energyline.ltd.uk)  
 [www.energyline.ltd.uk](http://www.energyline.ltd.uk)  
 Jubilee Court, Copgrove, N. Yorkshire, HG3 3TB

  
Electricity Networks Expertise



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19<sup>th</sup> June 2025

Dear Sir/Madam,

**ENRAY POWER – APPLICATION FOR A BATTERY ENERGY STORAGE SYSTEM AT LAND FORMING PART OF HALFWAY HOUSE FARM, BEANACRE.**

We are writing to introduce you to a proposal for a 100 MW Battery Energy Storage System (BESS) installation (the proposed development) at Land forming part of Halfway House Farm, Beanacre (the Site) by Enray Power (hereafter referred to as 'Enray').

As the local Parish Council to the Site, this letter provides information about the proposed development and invites you to give feedback prior to the submission of a formal planning application to Wiltshire Council.

Enray have already undertaken pre-application consultation with Wiltshire Council as the Local Planning Authority for the Site and are currently in the process of consulting with public bodies such as the Dorset and Wiltshire Fire and Rescue Service regarding the design of the development. In addition, we will also be applying to Wiltshire Council to confirm the application is not 'EIA development' as per the Environmental Impact Assessment (EIA) Regulations 2017.

**What is a Battery Energy Storage System? How does the Technology Work and Why is it Being Proposed?**

Battery Energy Storage Systems, or BESS facilities, are rechargeable batteries that can store energy from different sources and discharge it back to the electrical grid when needed.

Currently, clean power is regularly wasted as renewable energy generation can exceed the capacity of the electricity network. For example, at night-time, wind turbines can generate a lot of electrical energy, but there is not much demand at this time, and therefore there is surplus energy. The amount of wind generation wasted in 2022 due to wind congestion was equivalent to the yearly consumption of approximately 1 million households.

In order to meet the UK's net zero targets, it has been assessed that the UK needs to deploy 7 times the amount of energy storage currently operating. More battery systems are therefore needed to secure our energy supply.

### **What are the Benefits of BESS facilities?**

There are numerous environmental, economic and social benefits of BESS facilities, a selection of which are outlined below:

- Supporting renewable energy schemes, BESS facilities play a vital role in reducing UK's reliance on foreign fossil fuels, ensuring a cleaner environment and securing the nation's energy supply, preventing blackouts.
- The proposed BESS at Halfway House Farm could power approximately the equivalent of ~54,000 household's average daily demand.
- The BESS site will offset 950,000 tonnes of Carbon Dioxide (CO<sub>2</sub>) if that same electricity was otherwise generated by burning Natural Gas.
- By storing surplus energy and redistributing it during peak demand, BESS reduces electricity system costs, benefiting consumers in the long term.
- BESS projects create jobs during construction and ongoing operation.
- The proposed BESS will deliver a minimum of 10% biodiversity net gain, enhancing the natural environment.
- The proposed BESS at Halfway House Farm will provide additional drainage and will not increase flood risk.

### **What is being proposed here?**

A draft Proposed Site Layout Plan is provided at Appendix A to this letter and illustrates Enray's current thoughts on the proposed design of the scheme at Halfway House Farm. A photo illustrating the typical design of a BESS facility, such as the one proposed at Halfway House Farm, is also provided on Page 4.

### **Why at this Site?**

In order for a BESS facility to function there needs to be a suitable connection to the electrical grid. The scheme will connect via underground cable to the National Grid Melksham Substation to the south west of the Site, on Westlands Lane.

There are also several other factors which have been considered when selecting this Site. These include:

- Distance away from residential properties: The proposed BESS has been deliberately sited at the northernmost end of the farm, ensuring maximum distance from the nearest residential properties. The closest residential property is approximately 200 metres away from the proposed compound location. Therefore, harm to the amenity of any properties in terms of noise or visual impact will be limited.

- Screening, Landscaping and Biodiversity: Direct views of the BESS would be limited by the existing established hedgerows and landscaping. Further landscaping is also proposed as part of the proposed development which will support biodiversity in the area using native species planting.
- Designations: The proposed siting of the BESS will not be located in a protected area such as a National Landscape. The Site is not within the Green Belt either. There are no protected trees, or ecological sites of international, national or local importance in proximity to the proposed siting of the BESS. The BESS facility is also located outside areas at high risk of flooding.
- Access: There is an existing access for agricultural vehicles to the Site from Chapel Lane, which is currently used to access the farm, and provides suitable and safe access to the Site for construction and operational purposes. Full details of the site access and haulage route will be submitted as part of the full planning application.

### **Is it Safe?**

Enray acknowledge that the public may have questions about safety. Below are some commitments which ensure that batteries are a safe technology:

- Enray only procure equipment from reputable manufacturers with excellent safety track records. All equipment is rigorously tested, to the latest industry standards.
- There are least 160 utility scale battery storage systems in the UK which operate safely.
- Enray are consulting Dorset and Wiltshire Fire Rescue Service to inform the design, and they will also act as a consultee to the Council on the planning application. A verification report will be submitted with the planning application ensuring the facility meets the latest National Fire Chief Council guidance.
- Enray will prepare a detailed battery storage plan to accompany the proposed development, detailing how the BESS facility will be managed through its lifetime.
- Battery units have minimum of 5m separation distance to reduce fire risk.
- Enray will have a strict programme of testing and maintenance throughout the operational life of the site. Battery containers are monitored 24/7, thereby any fault within the battery would be detected and immediately taken offline.
- Despite the risk of fires being extremely low, a fire risk management plan and an emergency response plan will be developed for the Site.



Figure 1: A photo illustrating the typical design of a BESS facility, such as the one proposed at Halfway House Farm

### **What are the next steps?**

As the local Parish Council to the Site, we want to give you the opportunity to provide us with any comments and/or questions on the proposed development. This consultation will run until 3<sup>rd</sup> July 2025, and we welcome any comments or queries during this period. Comments and queries can be sent via email to [consultations@energyline.ltd.uk](mailto:consultations@energyline.ltd.uk). A short form is also provided at Appendix B to help facilitate any feedback. This form can be sent back via email or by post, to the following address:

Energyline Limited  
Planning and Environmental Team  
Jubilee Court  
Copgrove  
North Yorkshire  
HG3 3TB

Following this, the consultation responses will be considered, informing the design where possible, and a planning application will subsequently be submitted to Wiltshire Council. Following submission, the application will be published on the Council's planning website where you will also have the opportunity to review and comment on the proposals before a decision is made by the Council on whether or not to grant planning permission.

Your sincerely,

Energyline Limited  
(Planning Consultants on behalf of Enray Power)

**Appendix A: Proposed Site Layout Plan**

Please see overleaf.



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 whole or in part or used in any manner without prior written permission.  
 Scaled dimensions must not be taken from this drawing. All dimensions are to be confirmed on site prior to  
 commencement of work.

## Revisions:

Revision	Date	Revision Notes	Drawn	Accepted
01	27.06.23	First Issue	JM	RS
02	30.06.23	Revised	JM	RS
03	11.07.23	BESS Site Revised	PP	RS
04	10.08.23	Background Map Changed to OS Data	KC	RS
05	04.02.24	Amendments to BESS site	OB	RS
06	15.02.24	Amendments and change to 5m spacing	OB	RS
07	27.02.24	Additional constraints	OB	RS
08	07.03.24	Change to Triva Elements 2 design	OB	RS
09	13.05.24	Layout Revised, Water Tank Added	GM	RS

## LEGEND:

	PLANNING APPLICATION BOUNDARY
	DND ACCESS ROUTE
	SITE ACCESS
	INTERNAL ACCESS
	EMERGENCY ACCESS
	PERIMETER FENCELINE
	EXISTING 132KV OH CABLE
	EXISTING 132KV OH CABLE

## SITE INFRASTRUCTURE:

	SECURITY GATE		BESS BATTERY UNIT
	TWIN SKID (TX)		PCS INVERTER
	132KV SUBSTATION & CONTROL ROOM		BATTERY INTERFACE CABINET
	CCTV CAMERA		STORAGE CONTAINER
	AUX TRANSFORMER		CUSTOMER SWITCHGEAR
	240,000L WATER TANK		HYDRANT

## VEGETATION:

	EXISTING VEGETATION
--	---------------------

Project:

**Halfway House BESS**  
 Land on the East Side Of Chapel Lane,  
 Beanacre Melksham, SN12, 7QA

Consultant:

**INTEGRUM**  
 RENEWABLE ENERGY

Integrum Renewable Energy Ltd

107 - 109 Denham House,  
 RTC Business Park,  
 London Road,  
 Derby, DE24 6UF

Drawn by:



CADmando Design & Drafting Solutions Ltd  
 The Long Barn, The Courtyard, Seven Drive, Teesbury  
 Business Park, GL20 9SD  
 Tel: +44 (0) 1634 855019  
 Mob: +44 (0) 7514436910

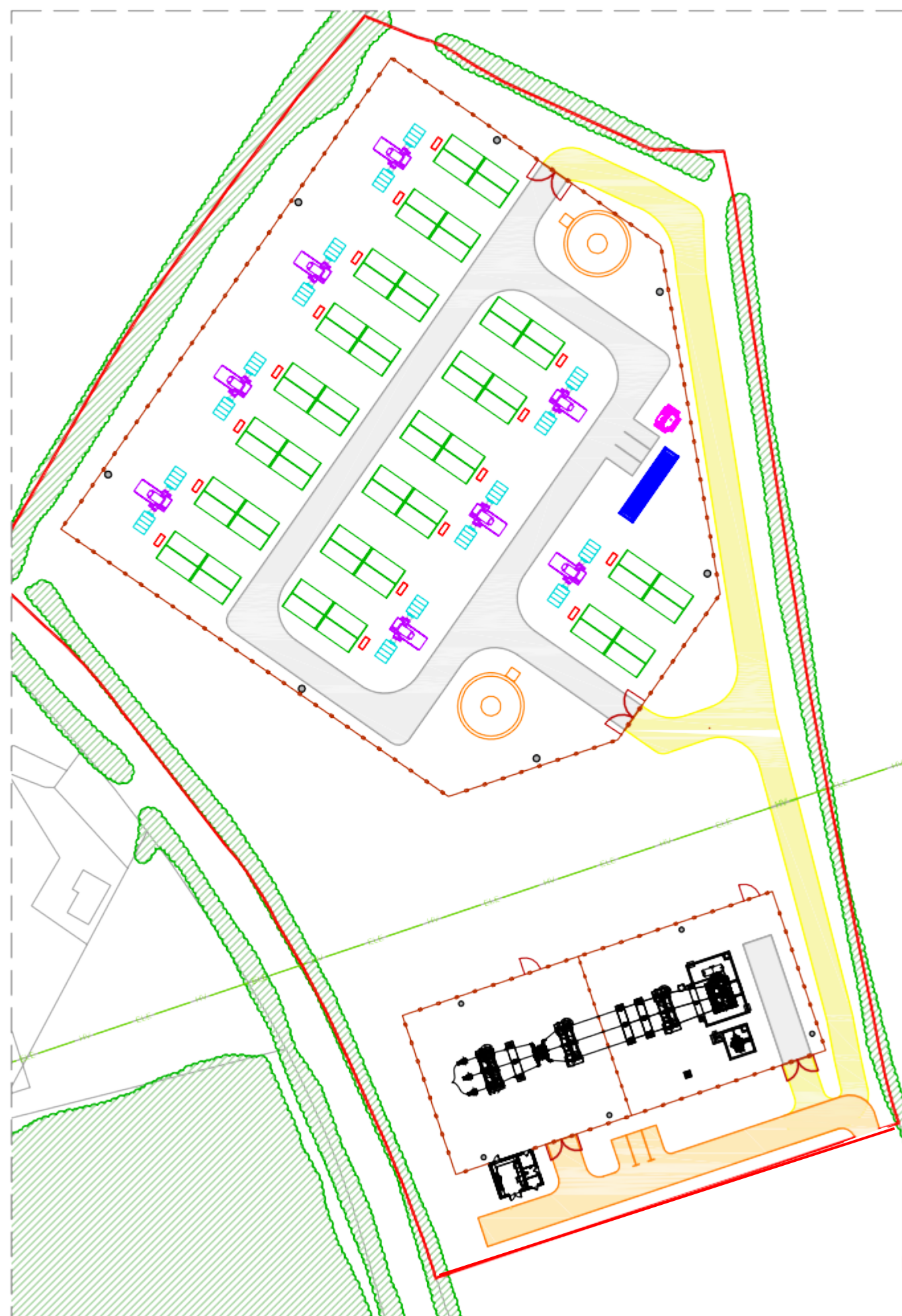
Status:

**PLANNING**

Drawing Title:

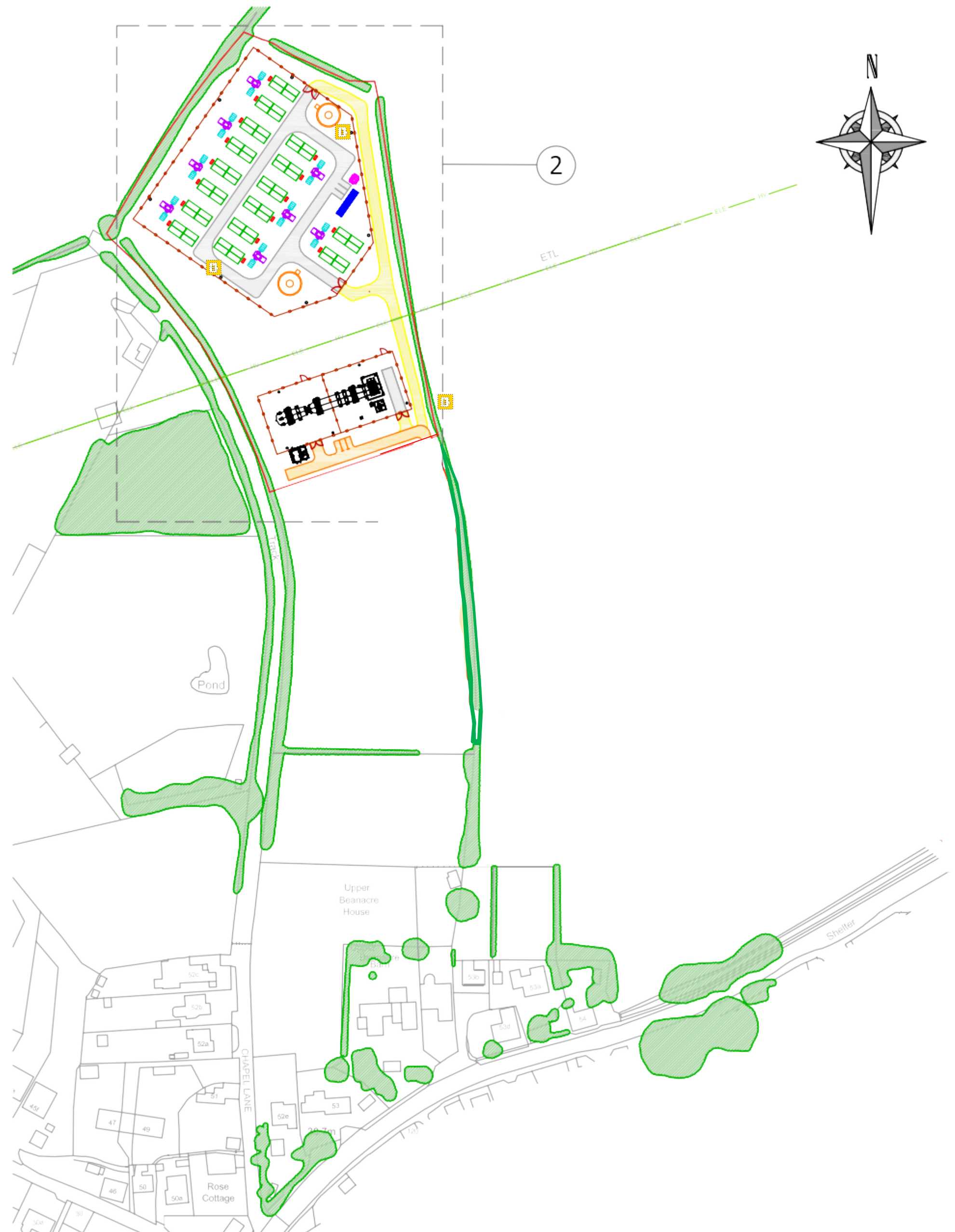
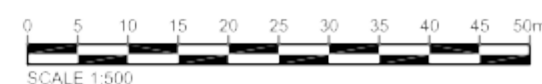
**Halfway House BESS**  
**Proposed Site Layout Plan**

Drawn: JM	Checked: RS	First Issued: 27.06.2023
Project Code: <b>IRE005-</b>	Drawing Number: <b>PL-01</b>	Revision: <b>09</b>
Sheet Size: <b>A1</b>	Scale: <b>A:N</b>	



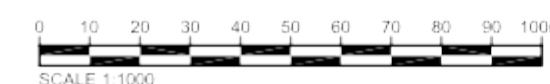
**2 BESS PROPOSED SITE LAYOUT PLAN**

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**1 HALFWAY HOUSE SITE LAYOUT PLAN**

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## Appendix B: Public Consultation Feedback Form

### **Question 1:**

Are you a local resident or Parish Council? (please tick the relevant box)

Local Resident ☐

Parish Council ☐

### **Question 2:**

Do you agree that we are facing a climate crisis?

Yes ☐

No ☐

Unsure ☐

If no, please explain why:

### **Question 3:**

Do you agree that Battery Energy Storage Systems can help to reduce our carbon emissions?

Yes ☐

No ☐

Unsure ☐

If no, please explain why:

### **Question 4:**

Are you, in general, supportive of the development of Battery Energy Storage Systems?

Yes ☐

No ☐

Unsure ☐

If no, please explain why:

**Question 5:**

What, if any, comments do you have about the proposed development at Halfway House Farm?

**Question 6:**

Can you think of any improvements you would want to see as part of the overall scheme? E.g. layout changes and wildlife improvements?

**Question 7:**

Having viewed the consultation material, do you support the development of a BESS facility in this location?

Yes ☐

No ☐

Unsure ☐

**If you have any further suggestions or comments regarding the development of a BESS at this location, please use the space below:**

## Fiona Dey

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**From:** Fiona Dey  
**Sent:** 20 June 2025 10:31  
**To:** consultations@energyline.ltd.uk; Sophie.Cattlin@energyline.ltd.uk  
**Cc:** Teresa Strange  
**Subject:** Consultation re. Proposed Battery Energy Storage System (BESS) at land at Halfway House Farm, Beanacre

Good Morning,

Thank you for your correspondence regarding the proposed development at land at Halfway House Farm, Beanacre and the proposed Battery Energy Storage System (BESS). Melksham Without Parish Council would like the opportunity to have a pre-application meeting with you as part of your current consultation. Would this be possible and could you propose some suitable dates & times?

We would be happy to host the meeting at our Council Offices located at Melksham Community Campus, Melksham, SN12 6ES.

Please see link to the parish council's pre app protocol in the adopted Melksham Neighbourhood Plan  
[https://www.melkshamneighbourhoodplan.org/files/ugd/da341b\\_98a68c0eabc446bf896fc6e062079926.pdf](https://www.melkshamneighbourhoodplan.org/files/ugd/da341b_98a68c0eabc446bf896fc6e062079926.pdf)

Kind regards  
Fiona

Fiona Dey  
Parish Officer  
Melksham Without Parish Council  
First Floor  
Melksham Community Campus  
Market Place, Melksham  
Wiltshire, SN12 6ES  
01225 705700  
[office@melkshamwithout-pc.gov.uk](mailto:office@melkshamwithout-pc.gov.uk)  
[www.melkshamwithout-pc.gov.uk](http://www.melkshamwithout-pc.gov.uk)

Want to keep in touch?

Follow us on facebook: Melksham Without Parish Council or Teresa Strange (Clerk) for additional community news  
On twitter: @melkshamwithout On Instagram: melkshamwithoutpc

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## Fiona Dey

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**From:** Teresa Strange  
**Sent:** 23 June 2025 09:05  
**To:** Fiona Dey  
**Subject:** Fw: Beanacre Application for further Battery Storage in Beanacre

Morning Fiona

Hope you have had a good weekend.

This is for thd agenda pack pls, with this agenda item. Redacted of name and email address please.

Thanks

Teresa

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**Sent:** Saturday, June 21, 2025 12:34

**To:** Teresa Strange <clerk@melkshamwithout-pc.gov.uk>; phil.alford@wiltshire.gov.uk  
<phil.alford@wiltshire.gov.uk>

**Subject:** Beanacre Application for further Battery Storage in Beanacre

Good morning

We are now faced with yet more battery storage applications for Beanacre. We are now surrounded by battery storage, solar panels and national grid site. **There is no benefit to residents** yet we are suffering due to these developments. The main concern is lack of habitat for the wildlife, I have personally seen the deer, running scared, from their home due to all the upheaval in Westlands Lane. There is now a plan from Energyline/Enray (conveniently difficult to find anything about this online) for further battery site at the end of Chapel Lane.

This cannot continue, a small village being encompassed by electrical stations, our views have been removed, our walks removed from us, it is impossible to walk down Westlands Lane due to high grass, signage across the verge and traffic. The public footpaths are impassible, no fields to walk due to works everywhere. The disruption to everyday life is everywhere, noise, mud on road when wet, Lorries everywhere, even against restrictive signage. You cannot sit in your garden without hearing noise from the National Grid works and Wick solar works. Chapel Lane, I believe is part of the old Roman road and now this is proposed for traffic, to enable another battery site. The entrance and exit is onto the dangerous A350, how could this be allowed. Where is this ever going to end. Yes there is a National Grid site close which they wish to tap into, however, this was already a scar on our homes that we lived with, not expecting to have more and more eyesores and noise daily.

I would also query the health impact of these electrical sites. What research has been undertaken to ensure that this is safe for residents. We already live near power lines and despite researching into this when we bought our home, I am still not convinced there is no risk to health. My son suffered a brain tumour and I know of at least two others who live close to the National grid site who have suffered brain tumours, is this coincidental?

This further application needs to be refused to protect what is left. Please do what you can to protect residents. Please confirm receipt and what action you will be taking.

Sent from my iPad

## Delegated Report

<b>Application Reference</b>	PL/2023/05883
<b>Site Address</b>	Land to the rear of 52e, Chapel Lane, Beanacre, Melksham, Wilts, SN12 7PX
<b>Proposal</b>	Erection of three dwellings, with access, parking, and associated works including landscaping (Outline application with all matters reserved - Resubmission of PL/2022/06389
<b>Type of Application</b>	Outline – all matters reserved
<b>Case Officer</b>	David Cox

### 1. Purpose of Report

The purpose of this report is to assess the merits of the proposal against the policies of the development plan and other material considerations and to consider the recommendation that the application should be refused.

### 2. Report Summary

The key determining planning issues are considered to be: The Principle of Development, Drainage and Flood Risk, Impact on the Street Scene and Neighbouring Amenity, Highway Safety (including public right of way MELW99) and Car Parking and Ecology/BNG.

### 3. Site Description

Beanacre is defined as a small village in the Wiltshire Core Strategy and therefore does not have a limits of development boundary.

The application site is approximately 0.4 hectares and comprises of a 'P' shaped application site that is enclosed from Chapel Lane by a mature existing hedge.



Site Location Plan and Council mapping image of the application site

Chapel Lane is accessed directly off the A350 Beanacre Road which leads southwards to Melksham and northwards to Chippenham. The Council's mapping system shows the Chapel



Lane access onto the A350 to be approximately 10m wide, however once the grass verges are taken into account the access is considered to be approximately 6m wide.



Google Street View Image of Chapel Lane access onto the A350

Chapel Lane is a private road which continues for approximately 118m serving 8 dwellings until it then becomes a track leading to agricultural fields. Public Right of Way MELW99 also runs up Chapel Lane from the A350 and up the track and into the open countryside to the north. Chapel Lane is generally only wide enough for one car although as the road is quite straight there is good visibility down the road. There are driveways of the properties and adjacent to No 52e there is a grass verge parking area; whilst these could be informal passing areas it is assumed that they are private spaces and access, and use can be restricted (as demonstrated by No 52c's use of a barrier across its driveway).



View from the north of Chapel Lane looking towards the A350

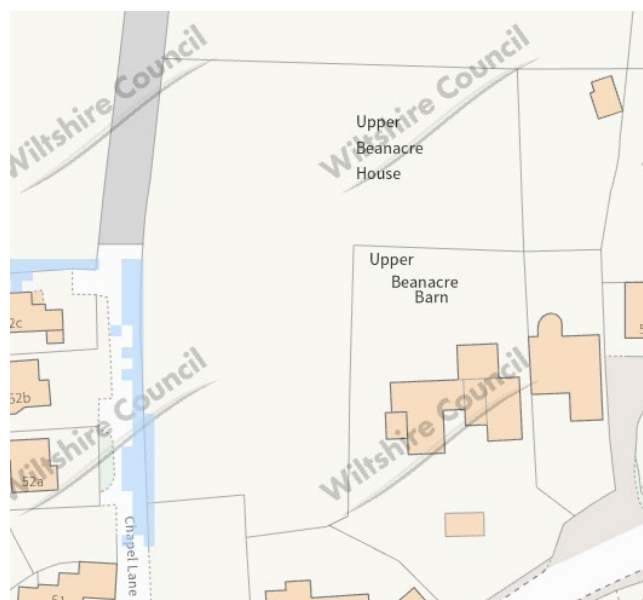


The dwellings on the A350 and immediately off Chapel Lane are predominantly two storey dwellings – but the three dwellings that would be opposite the site, No's 52a, 52b and 52c are all bungalows.

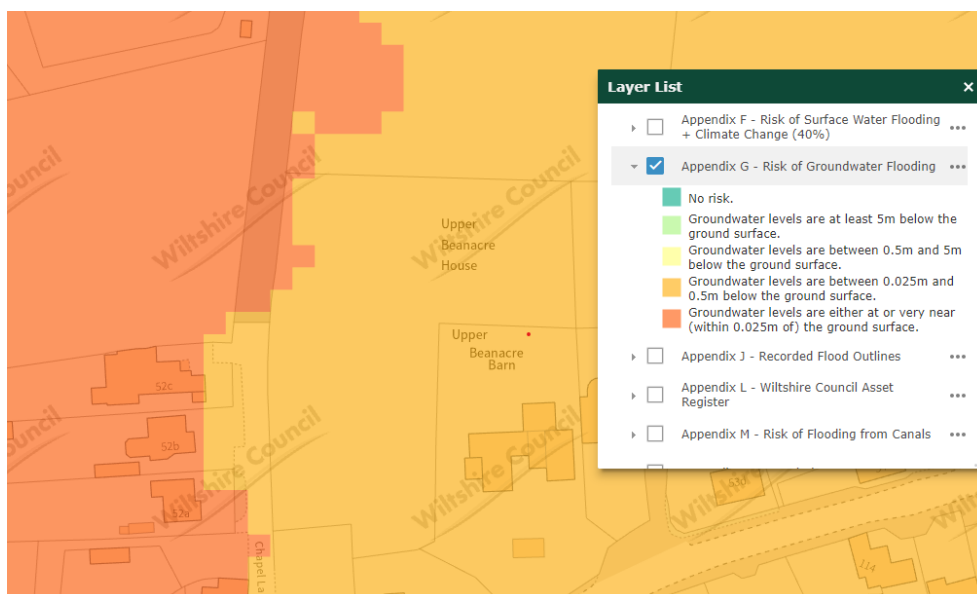


The application site forms grade 2 agricultural land. It is also within flood zone 1. Small parts of Chapel Lane (and potentially very limited parts within the application site) are at 1:1000 risk of surface water flooding. The western edge of the application site is a drainage ditch separating Chapel Lane from the hedge that currently encloses the site.

The majority of the site is also within the second highest risk of ground water flooding (orange - 0.025m and 0.5m zone below the ground surface) with a very small section within the highest (red - 0.025m) below the ground surface.



1:1000 Risk of Surface Water Flooding



#### Ground Water Flood Risk (via Wiltshire Council's 2019 Strategic Flood Risk Assessment)

The site is not within a conservation area and the closest listed building Upper Beanacre Farmhouse is 105m away and on the opposite side of the A350 to the south.

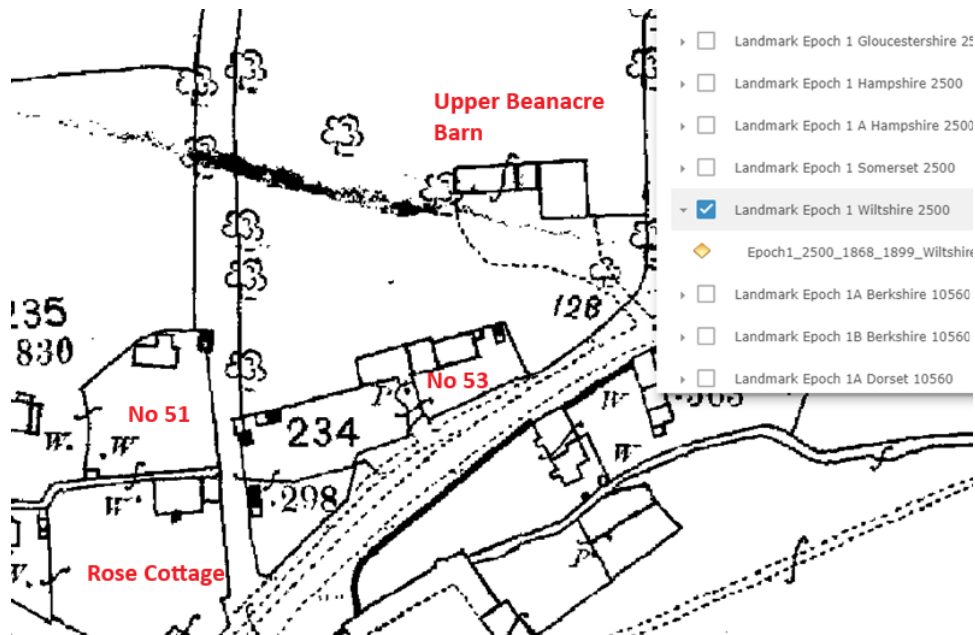
#### **4. Planning History**

W/80/01516/HIS - *Outline 4 building plots and improvement of Chapel Lane to County Standard* – Refused; for 4 reasons and is also understood to have been dismissed at appeal.

DECISION OF THE PLANNING AUTHORITY			DATE & DECISION OF MINISTER, EITHER ON APPEAL OR REFERENCE UNDER SECTION 22 OF THE ACT
DATE	REFUSAL OR CONSENT	CONDITIONS OF PERMISSION, OR REASONS FOR REFUSAL	
3.2.81	R	<p>1. The proposal is contrary to the provisions of policy H4 of Melksham District Plan and policy H14 of the Western Wiltshire Structure Plan which limits development in the village to infilling i.e. the filling of a small gap in an otherwise built up frontage.</p> <p>2. The development represents an unwarranted extension of the village into the open countryside to the detriment of the rural character of the locality.</p> <p>3. If permitted, the development would establish a precedent for further similar proposals which would be the more difficult to resist and which cumulatively would further erode the rural character of the area.</p> <p>4. The proposal for development on Grade 2 agricultural land is contrary to Policy RE8 of the Melksham District Plan which states that, in general, there will be a presumption against development of land classified as Grade 1 or 2 and land classified as 3a will be safe-guarded wherever possible.</p>	<p>APPEAL DISMISSED 5.11.81.</p>

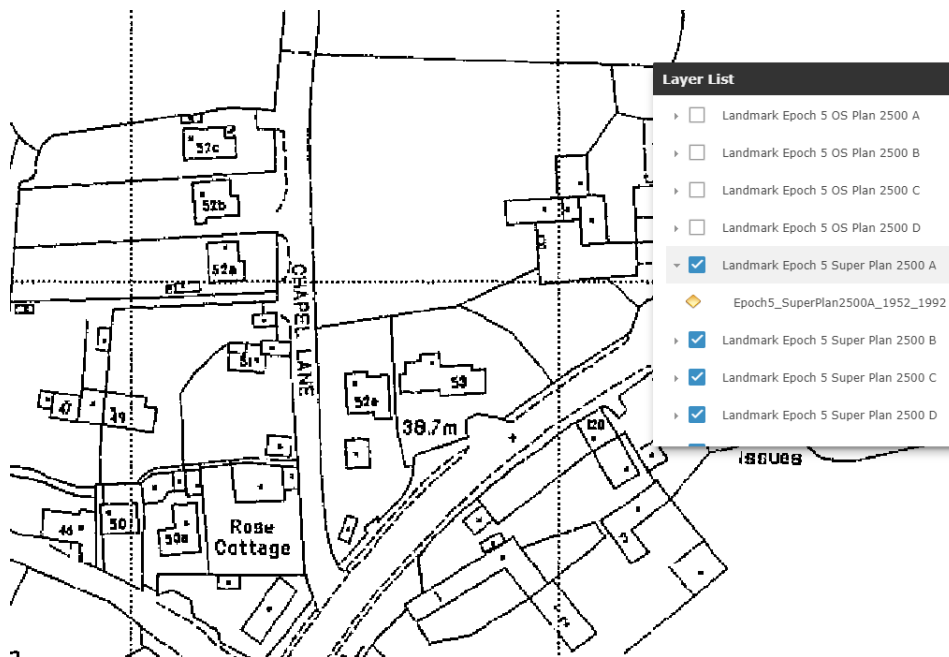
For the avoidance of any doubt the Council does not have record of the Melksham District Plan or the Western Wiltshire Structure Plan to fully understand what the policy wording contained. It is also not known as to what the extent of surrounding built form was for the application to not be considered as an infill site.

Historic maps show that in 1868-1899 Upper Beanacre Farm, No 51, No 53 and Rose Cottage had already been built.



1868-1899 Historic Mapping Image

However, there are no historic planning records as to when No's 52a, 52b and 52c were built and is therefore assumed to have been built between 1952 and 1970 (1970 is when records began in West Wiltshire) and would therefore have been present for application W/80/01516/HIS.



1952-1992 Historic Mapping Image

PL/2022/06389 - Erection of three dwellings, with access, parking – Withdrawn by applicant due to lack of ecology and flooding evidence.

For the avoidance of any doubt, the red outline of PL/2022/06389 did not include the parcel of land to the north of the application site (that makes the 'P' shape) and has been included in this PL/2023/05883 application to form part of the drainage solution for the proposal.

## 5. The Proposal

This is an outline application with all matters reserved for the erection of 3 dwellings. As an outline with all matters reserved the plans are all indicative and would require reserved matters applications for all aspects including access, layout, external appearance, landscaping and materials.

However, in order to demonstrate where the dwellings would be located within the red outline an indicative layout plan was submitted to demonstrate that the three dwellings would each have their own driveways and be relatively opposite No's 52a, 52b and 52c, with plot 3's garden in line with the northern boundary of Upper Beanacre Barn.

As the western boundary of the site has a drainage ditch adjacent to Chapel Lane, the applicants have confirmed that culverts would be installed underneath each driveway access with 225-300mm pipes with headwalls on both upstream and downstream of each crossing point.

The indicative layout plan has shown that the dwellings would be set back from the road allowing for two off road parking spaces each along with soft landscaping. Whilst the indicative plans do not demonstrate it, there is likely to be sufficient space within each plot for two parking spaces to be provided along with a turning head, which will allow cars the opportunity to leave the site in a forward gear and allow for visibility down Chapel Lane to the junction with the A350.

An indicative turning head has been shown at the top northern end of the application site on plot 3 which is intended to be used communal use of delivery/service vehicles.



Indicative layout plan

The applicants are proposing their own on-site foul drainage solution using a package treatment plant which then feeds into a drainage mound. Both the package treatment plant and the drainage mound would be in the northern part of the site, and separated from plot 3

The site plan illustrates the proposed drainage system for the Upper Beanacre Barn. Key features include:

- Package Treatment Plant:** A rectangular structure with a population of 15, designed for 150 persons/void. It includes BOD loading of 40g/head/day and Ammonia as N loading of 8g/head/day.
- Drainage Mound - Above Ground:** A rectangular structure with an area of 74.0m², designed for 150 persons/void. It includes BOD loading of 40g/head/day and Ammonia as N loading of 8g/head/day.
- Upper Beanacre Barn:** A large rectangular structure with a roof protection barrier to be installed where the trench abuts tree roots.
- Drainage Layout:** A network of pipes and manholes (F0, F1, F2, F3, F3.1) showing the flow of water from the barn and treatment plant to the drainage mound.
- Other Structures:** A water butt for rainwater harvesting, a garden, and a driveway.
- Topography:** Contour lines and spot heights indicating the ground level and the proposed drainage level.

150mm topsoil

300mm Distribution Layer

Proposed ground level

Permeable Geotextile (1000 or similar)

1:3 slope

Existing ground level

60-80mm Stable Rock Layer

Maximum Groundwater level found 0.3m below

100mm below existing topsoil to be ploughed

The Applicants have submitted a range of Drainage and Flood Risk Documents including;

- Drainage Design Plan
- Flood Risk Assessment (FRA) and Drainage Statement
- Infiltration Testing Report

Infrastruct CS Ltd – Infiltration Testing May 2023:

## GROUNDWATER

Following completion, TP01, which was taken down to 2.3m depth, was left open for two hours after which the standing water level was recorded at 1.7m.



Infrastruct CS Ltd – Flood Risk Assessment and Drainage Statement May 2024:

Three monitoring wells were installed (in slightly different locations to the trial pits) and found:

Borehole Reference	Groundwater Strikes (m bgl)	Standing Water Levels (m bgl)			
		13/12/23	05/01/24	08/02/24	07/03/24
CT01	1.0	0.7	0.2	0.2	0.5
CT02	1.0	1.0	0.2	0.3	0.5
CT03	1.0	1.1	0.3	0.4	0.6

**Conclusions**  
Based on the findings of this and the previous investigation it is considered the local groundwater level is variable depending on weather conditions and time of year. However, the monitoring carried out indicates the local groundwater level across the site is close to ground level during the winter months.

Listers Ground Water Monitoring (Feb-March 2025):

Formal document not submitted but data from the monitoring wells found:

Location	Monitoring dates, groundwater depths (m below Ground Level)	
	27/02/2025	11/03/2025
CT01	0.53	0.59
CT02	0.40	0.74
CT03	0.56	0.67



Plan to show the location of the CT locations

## 6. Planning Policy

### National Context:

The National Planning Policy Framework 2024 (NPPF) and Planning Practice Guidance (PPG)

### Local Context:

The Wiltshire Core Strategy (adopted Jan 2015): CP1 – Settlement Strategy; CP2 Delivery Strategy; CP15 - Melksham Community Area; CP50 -Bio-diversity and Geodiversity; CP51 - Landscape; CP57 – Ensuring High Quality Design and Place Shaping; CP58 – Ensuring the Conservation of the Historic Environment; CP60 – Sustainable Transport; CP61 – Transport; New Development; CP64 – Demand Management and CP67 – Flood Risk

West Wiltshire District Local Plan (1st Alteration) - U1a Foul Water Disposal

Wiltshire Council Strategic Flood Risk Assessment 2019

Wiltshire Council's Groundwater Management Strategy 2016

Melksham Neighbourhood Plan 2020-2026 – Made July 2021 – Policy 6 – Housing Development

Wiltshire and Swindon Minerals Development Control Policies Development Plan Document: 2006 – 2026

- Policy MDC4 - Proposals for development within Minerals Safeguarding Areas

## 7. Consultations

The initial public consultation was sent out on 25 July 2023 and additional information and revised plans were received on 8 April and 1 July 2024 which were both publicly consulted on for 14 days each. Further specific consultations have been carried out with the Drainage Officers.

Cllr Alford called this application into Committee should Officers be minded to approve the application:

*Beanacre is a small village and has no settlement boundary, the site is not infill and is adjacent to open countryside and is unsustainable therefore contrary to Core Policy 2 of the Wiltshire Core Strategy. The proposal is also contrary to policy 6 of the made Neighbourhood Plan that is up to date to 2026. The highways access is not compliant to the NPPF and is unsafe. The access is only 12ft wide and not 12m as written in the application. There is no turnaround space for cars in the land and no turning head, which means some have to reverse out onto the busy A350. Flooding is also a local problem with Chapel Lane and Westlands having recently flooded.*

### Melksham Without Parish Council – Objection

*Having considered the revised plans, the Parish Council object to proposals and wish to reiterate their previous concerns, particularly regarding drainage, highway safety concerns and the removal of an established hedgerow, which will reduce the biodiversity for the area.*

*The Parish Council believe the introduction of a turning head does not alleviate concerns previously raised and will not accommodate larger vehicles, such as septic tankers turning around. They also suspect there is nothing preventing the proposed turning head from being an additional parking space and raise a concern who will make sure it is kept free. Members*

*also raise a concern who will ensure the boundary treatment does not exceed 900mm, in order to ensure visibility across the frontage, as suggested by Highways in their comments.*

*Given the Council's concern at the impact this development will have on drainage of the area, it was agreed to contact Wessex Water and the Environment Agency direct to make them aware of proposals and to ask they provide a response as it does not look like Wiltshire Council took up the parish council's suggestion to consult them. To also contact Wiltshire Council Drainage team to chase a response to revised plans.*

Wiltshire Council Drainage Officer – Objection.

NB: There have been 6 consultation responses over the course of this application, including two which had 'no objection subject to conditions'. However, both 'no objections' were based on requiring further information as to how the site could be drained given that SuDs and soakaways would be located in saturated ground due to the ground water levels. Additionally, following review of the July 2024 ground monitoring data (and following outcomes of various appeals and Counsel advice) Drainage Officers have now confirmed objection.

*"After looking at the additional Feb / Mar 2025 GI data, I would still have the concern that groundwater is still close to the surface. I acknowledge that the groundwater levels shown in the 2025 data are lower than those from 2024 but it is important to note the following:*

- i. Monitoring results for January 2025 are not shown*
- ii. When comparing 2024 vs 2025 data we can see a similar trend that Groundwater levels drop between February and March; if we therefore extrapolate to January 2025 based on previous observed trends (and confirmed by the 2024 data) we would likely have seen Groundwater levels closer to the surface in January 2025.*
- iii. The GWLs shown in 2025 are of similar order of magnitude to 2024 – this helps confirm that 2024 readings were not anomalous.*
- iv. Winter 2023-2024 was comparably wetter than Winter 2024-2025 (approx. 350mm vs 280mm); with Winter 2024/2025 experiencing fewer named storms and a weak La Nina effect. When we compare to the GI provided we see a corresponding (and predictably higher) GWL in the 2024 GI (corresponding to the winter 2023 – 2024 storm)*

*With regards the May 2023 data, it is noted that this was completed using trial pits. Trial pits are inherently less accurate than monitoring wells (although are often used to help undertake initial assessments) given they disturb surrounding soil and can lead to short-term variations in observed groundwater level. That said, the 2024 / 2025 data would indicate that groundwater levels would likely be falling by May on this site, and as we would mainly be concerned with peak seasonal groundwater levels, we would put greater weight on the 2024 and 2025 readings.*

*Given that there is still groundwater within 1m of the surface, and therefore within 1m of the base of infiltration based drainage (at least at points during the year), I would continue to question whether there is a credible drainage strategy, given this is solely based on infiltration.*



Wiltshire Council Highways Officer – No objection subject to conditions

*The site is served via Chapel Lane; the junction of Chapel Lane with the A350 is acceptable to accommodate an extra 3 dwellings.*

*The turning head as shown would be acceptable; it shall be identified as a turning head in perpetuity.*

Wiltshire Council Rights of Way Officer –

Initial objection received on 27 July 2023, however this was changed on 16 July 2024 to: No objection subject to conditions

*Note that the parking spaces are set further back from the bridleway (Chapel Lane) on the revised site plan and a turning area has been added in front of plot 3. I also note that Chapel Lane is included within the registered title of the applicant and it is therefore in their interest to maintain the surface to a higher standard than the Council would. As there are already a number of properties accessed via the bridleway I think the addition of 3 residential dwellings should be acceptable in principle. I therefore do not wish to sustain my earlier objection. Subject to the conditions below I have no objection to the revised proposal.*

Wiltshire Council Tree Officer – No objection subject to condition

*“The revised drainage layout plan showing the new location for the drainage mound area and package treatment plant is more appropriate with regards to the existing and proposed trees, however the landscape plan still does not reflect the number of trees on the drainage plan. I am happy to accept the landscape plan, however it would be useful if the plans corresponded with each other.”*

Wiltshire Council Ecology Officer – No objection subject to condition

*The application is supported by ecological documents which have been reviewed and include;*

- Preliminary Ecological Appraisal dated September 2022 by Darwin Ecology;*
- Reptile Survey dated June 2023 by Griffin Ecology and;*
- Landscape Proposals 2023\_59 001 Rev A dated July 2023 by Kirsten Bowden.*

*The surveys outline the sites low potential to support protected species and confirms the likely absence of reptiles on site.*

*Core Policy 50 of the Wiltshire Core Strategy requires all development to demonstrate no net loss of biodiversity and encourages developments to seek opportunities to enhance biodiversity.*

*A number of enhancement proposals have been provided to include habitat creation in the form of hedgerows, grassland and standing trees and these are included within the Landscape Proposals plan. The inclusion of these features would be in accordance with Core Policy 50.*

*However, additional information on the long-term provision and management of these enhancement measures will be required in the form of a LEMP prior to works commencing*

Wiltshire Council Landscape Officer – No comment to make

Dorset & Wiltshire Fire and Rescue Service – General comments relating to building control matters

*“In the event the planning permission is granted for this development, the development would need to be designed and built to meet current Building Regulations requirements.”*

Wessex Water: General comments only

*“In addition to the information sent below I can advise that the LLFA will need to approve the surface water arrangement and the EA and Natural England will need to approve the Package Treatment Plant.”*

## **8. Publicity**

The application was initially publicly advertised through the display of a site notice and at the site and 12 individually posted neighbour notification letters to local residents residing in properties.

In response to the public notification exercise, a total of 20 representations were received, all objecting. The objections and comments are summarised below:

### Objections:

- Loss of grade 2 agricultural land
- The principle of development is not supported and the proposal is not infill
- The land needed for the drainage mound is certainly not ‘infill’
- Over development of the site
- Access onto the A350 is hazardous. The number of HGVs has increased significantly
- Chapel Lane has flooded in recent years
- This proposal would interfere with the open ditch and further affect recent flood events
- Chapel Lane is a bridleway which is only 3.1m wide. There are no facilities for vehicles to turn around
- The junction onto the A350 is only 5m and doesn’t have adequate visibility splays
- The proposal would necessitate the removal of mature hedgerows with detrimental impacts on wildlife and visual amenity
- Likely soakaway issues
- There are no opportunities to turn around unless using private driveways
- Refuse bins on collection days restrict visibility and the access itself
- The Ecology survey is inadequate. No bat survey
- The proposal will block sunlight to adjacent properties
- No indication that a right of access exists to No 53 to allow for drainage maintenance
- concerned over traffic movements from the dwellings and during construction.

## **9. Planning Considerations and Assessment**

Section 70(2) of the Town and Country Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004 require that the determination of planning applications must be made in accordance with the Development Plan, unless material considerations indicate otherwise.

Principle of Development:

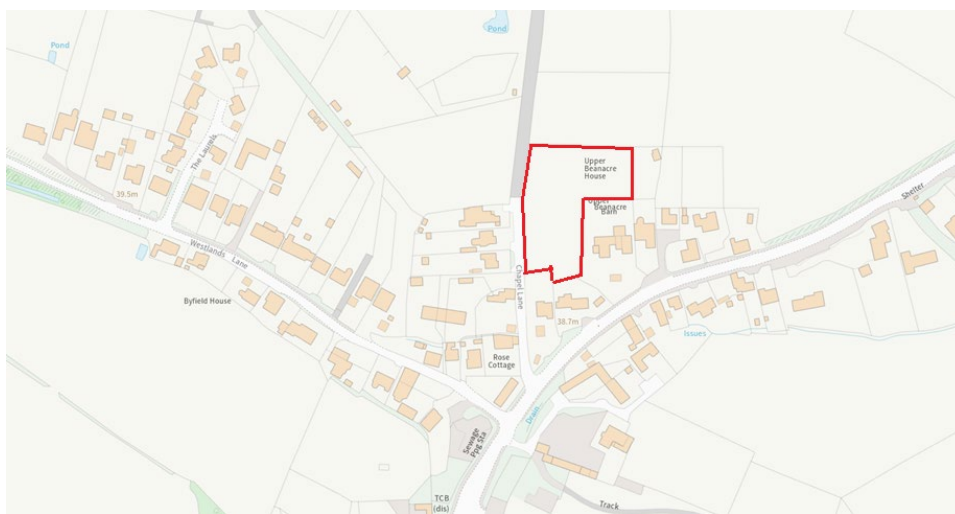
Core Policy 1 ‘*Settlement Strategy*’ and Core Policy 2 ‘*Delivery Strategy*’ of the Wiltshire Core Strategy (WCS) outlines the Council’s adopted hierarchy strategy which identifies the settlements where additional sustainable residential development should take place to improve the lives of all those who live and work in Wiltshire.

The adopted WCS identifies Beanacre in Core Policy 15 as a small village and Appendix F confirms that Beanacre is a small village that does not have development boundary limits. Core Policy 1 states that small villages have a low level of services and facilities, and few employment opportunities and consequently, development proposals should be limited to ‘infill’ opportunities. Preamble paragraph 4.34 states that for the purposes of CP2 “*infill is defined as the filling of a small gap within the village that is only large enough for not more than a few dwellings, generally only one dwelling.*”

Core Policy 2 states that “*At the same villages development will be limited to infill within the existing built area*” it would also require development to satisfy the following tests:

- i) *Respects the existing character and form of the settlement*
- ii) *Does not elongate the village*
- iii) *Does not consolidate an existing sporadic loose knit areas of development related to the settlement*

It is submitted that the built form of Beanacre is clearly identifiable as forming the development along the main spine of the A350 and the dwellings on Westlands Lane and Chapel Lane. At the end of Chapel Lane itself No 52c would align with the proposed northernmost proposed dwelling, which would also be broadly in line with the dwellings to the east (Upper Beanacre Farm). As such it is considered that this proposal would meet the definition of a small gap and would be infill development within the built area of the village. Additionally, it would respect the existing character and form of the settlement, would not elongate the village and as part of the existing built area would not consolidate an existing loose knit area of development related to the settlement.



The drainage mound would be in the northern part of the site, to which Officers agree with the third party representations would not be within the built area of the village, would not be a 'small gap' and consequentially would not be an 'infill' site. However, whilst forming a part of this overall development, the actual dwellings would be within part of the site that is considered to be infill compliant. The mound itself whilst having a footprint of approximately 15 x 11m, it would only be approximately 75cm high and would be in a field that will have additional soft landscaping including a wildflower meadow, which typically grow higher than 1m high. Furthermore, landscaping is a reserved matter and could be used to ensure that appropriate screening of the mound is designed and planned for.

It is submitted that refusing the application on the basis that the inclusion of the mound alone would be contrary to infill policy contained within CP2 (by not being within the built area of the village) would not be reasonable. Furthermore, it is submitted that the mound itself would not be out of character of the settlement or its form, and it would not elongate the village. The mound would look like a small grass hill or bank that can be screened using appropriate landscaping design and as such would assimilate into the wider countryside setting that the field would be part of.

#### 5 year housing land supply:

It is currently acknowledged that the Council cannot demonstrate a 5 year supply of housing, where current figures indicate a 2.03 year supply.

However, it is considered that the tilted balance is not engaged due to sub-note 7 relating to paragraph 11(d) of the NPPF. As will be set out in the next section the site is considered to be at flood risk due to ground water flood risk. Furthermore, the flood risk forms a 'strong reason' for refusal due to the need for the sequential test to be applied and due to the lack of credible evidence that the site can be drained.

#### Drainage and Flood Risk:

NPPF Paragraphs 173, 174 and 175 state;

*"173. A sequential risk-based approach should also be taken to individual applications in areas known to be at risk now or in future from any form of flooding, by following the steps set out below.*

*174. Within this context the aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test.*

*175. The sequential test should be used in areas known to be at risk now or in the future from any form of flooding, except in situations where a site-specific flood risk assessment demonstrates that no built development within the site boundary, including access or escape routes, land raising or other potentially vulnerable elements, would be located on an area that would be at risk of flooding from any source, now and in the future (having regard to potential changes in flood risk)."*

The issue of the sequential test was first raised in the PL/2022/06389 application where the Drainage Officer reported that the NPPF required the test to be taken for all sources of flooding, including ground water. The issue of surface water management was also raised. Application PL/2022/06389 had not been submitted with any site-specific flood risk assessment or any ground water monitoring (along with a lack of ecological survey) and was withdrawn until these details were provided.

However, when this application was received it only contained data from trial pit excavations and not formal ground well monitoring. Officers then requested that information which was provided by the applicants as set out in the introduction of this report.

As already set out, the initial trial pit trenching was carried out in May, when further data shows that ground water is not a problem at this time, and was also a method that is not as accurate as ground well monitoring.

The May 2024 results (from ground water monitoring wells) are very conclusive that for two months of the year (and the wettest part of the year) the ground water level was between 0.2-0.4m below ground and therefore well within the second highest category of flood risk as set out in the Council's 2019 Strategic Flood Risk Assessment (SFRA). The evidence suggests that for January 2024, the northern part of the site (CT01 and CT02) could be in the highest risk category. Nonetheless, the data for March 2024 further confirms that the majority of the site is within the second flood risk category.

Borehole Reference	Groundwater Strikes (m bgl)	Standing Water Levels (m bgl)			
		13/12/23	05/01/24	08/02/24	07/03/24
CT01	1.0	0.7	0.2	0.2	0.5
CT02	1.0	1.0	0.2	0.3	0.5
CT03	1.0	1.1	0.3	0.4	0.6

**Conclusions**  
Based on the findings of this and the previous investigation it is considered the local groundwater level is variable depending on weather conditions and time of year. However, the monitoring carried out indicates the local groundwater level across the site is close to ground level during the winter months.

#### May 2024 Report Data

The applicants were duly advised that this meant that the sequential test had to be applied because the site was clearly at flood risk as defined in both the SFRA and NPPF. Negotiations were then held between the Council and applicants to allow for additional ground water monitoring to be carried out (early 2025). The Council stressed that in order to be able to consider the May 2024 results as being an anomaly the 2025 evidence would have to be "compelling" i.e. demonstrate results that far exceed 0.5m and couldn't leave for any reasonable doubt. The Council further advised that it would be likely and preferable to withdraw the application to allow for winter 2025/26 testing to also be carried out to allow for a complete data set to be analysed. The applicants chose to carry out the 2025 testing understanding that it was unlikely to be sufficient to be able to overcome the May 2024 report data and that the Council could not extend the application again until mid 2026.

Unfortunately, ground monitoring wells were not installed again until February (missing the key month of January) and the February 2025 data confirmed that CT02 is still in the second highest category of flood risk with the two other wells being extremely close (within 3-6 cm). It

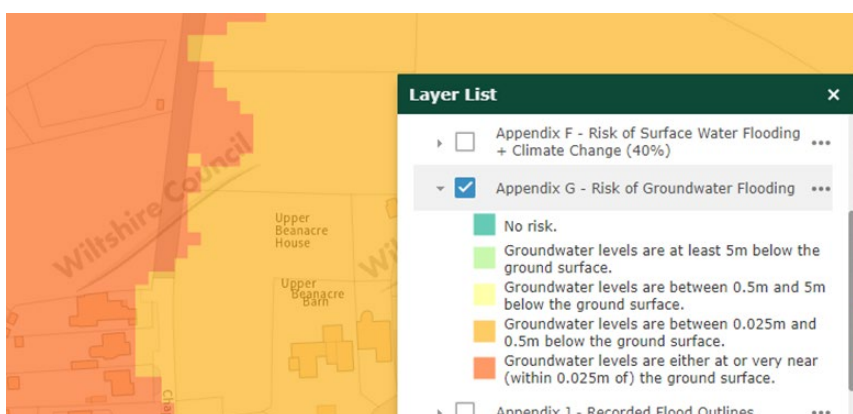
is submitted that had January 2025 been included, it is likely that it would have shown levels being below the 0.5m threshold.

Whilst the 2025 data is clearly an improvement, it is submitted that it is not conclusive enough to consider the 2024 data as being an anomaly. The 2025 data is of a similar magnitude to 2024. There is also evidence that the winter of 2023/24 was comparably wetter than winter 2024-25 which would explain why the 2025 data is more favourable.

Location	Monitoring dates, groundwater depths (m below Ground Level)	
	27/02/2025	11/03/2025
CT01	0.53	0.59
CT02	0.40	0.74
CT03	0.56	0.67

### 2025 Data

It is therefore concluded that the site is within the second (and even potentially the highest risk category for ground water flood risk) as defined in the SFRA and consequentially cannot be considered to be at a 'low risk' of flooding. Paragraphs 173-175 of the NPPF therefore apply and as the site is at risk of flooding the sequential test must be applied. The applicants have not supplied a sequential test of sites that could accommodate these three dwellings when requested to do so by the Council.



The first stage of the Sequential Test will identify all potential sites located within Flood Zone 1, and at low risk of flooding from all other sources, in order that they can be taken forward for consideration for inclusion in the Local Plan at the Preferred Option Stage (Figure 5.2). In Wiltshire, for a site to be considered at low risk of flooding, it meets the following conditions, determined by the Council:

- Site is within Flood Zone 1
- Site is not within Flood Zone 3 plus climate change
- Less than 10% of the site is at risk from surface water flooding in the 1 in 1,000-year event
- Less than 10% of the site is within highest risk category in JBA Groundwater map (groundwater is <0.025m below the surface in the 1 in 100-year event)
- Less than 75% of the site is within the second highest risk category in JBA Groundwater map (groundwater is between 0.025m and 0.5m below the surface in the 1 in 100-year event)

Extract from Wiltshire Council's 2019 Strategic Flood Risk Assessment



As ground water level have been demonstrated by the applicants own submitted data to be high, this brings into question whether the site can be adequately drained for its surface and foul water demands.

The Council's 2016 Ground Water Management Strategy is clear that in areas in ground water flood risk, infiltration drainage should not be permitted unless it can be demonstrated to be appropriate. This proposal relies on filtration for both surface and foul water drainage.

## **11.2 Soakaways and infiltration drainage**

11.2.1 Infiltration may be identified as the preferred drainage option under the FWMA and SUDS.

11.2.2 In areas susceptible to groundwater flooding infiltration drainage which may be part of a SuDs scheme for new developments should not be permitted unless it can be demonstrated to be appropriate by means of a local groundwater flood risk assessment including ground water level monitoring and a full FRA may be needed on all ground water sites.

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11.2.4 Unless a developer can demonstrate through the groundwater flood risk assessment that infiltration drainage has either no adverse impact on groundwater flood risk or could lead to improvements in all types of flood risk there should be a presumption against infiltration drainage in those areas. This may need works off site to address ground water flooding.

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### Extract from the 2016 Ground Water Management Strategy

The proposed foul water drainage strategy includes a package treatment plant with an outlet for the treated effluent to drain (into the drainage mound). Whilst the treatment plant will remove solids and a lot of the potential contaminants, the drainage mound is needed to help provide the final element of its treatment. Therefore, with ground water being as high as 20cm of the surface and with additional volumes being added there is a potential contamination risk as a result.

### Impact on highway safety:

Both the Highways and Public Rights of Way Officers have no objection to the proposal. Whilst Chapel Lane is narrow and generally only allows one car to pass it is considered that Chapel Lane can reasonably accommodate the additional vehicle movements. The Lane is quite straight allowing for clear visibility and the access onto the A350 is also considered to be acceptable. There will likely be instances where cars have difficulty in passing each other, but this is an existing situation and the additional car movements would not increase this to a harmful level in which to warrant the refusal of the application.

The plots are large enough to accommodate the required off road parking. The indicative plans have also included a 'communal' turning head at the northern end of the site (plot 3) which will help when delivery vehicles use Chapel Lane. The turning head was provided to help

overcome initial highway and public rights of way objections. This detail could be reasonably conditioned to ensure that the turning head is provided and maintained as such at all times for the lifetime of the development.

As this is an outline application, details of the access would be a 'reserved matter' for a future application but the applicants have submitted that the accesses will build over the drainage ditch, using culverts.

#### Impact on the street scene and neighbouring amenity:

This is an outline application to which matters relating to layout, scale, design and appearance are 'reserved matters'. Therefore, issues over visual amenity, potential overlooking, overshadowing etc would be matters for that application to address.

The dwellings opposite (No's 52a, b and c) are all single storey bungalows within fairly long and elongated rectangle shaped plots. Two of the dwellings also sit 'sideways' in the plot i.e. their gables face Chapel Lane and their main built form then extends into the depth of the plot. No 52a is orientated facing Chapel Lane and still comfortably sits within the plot. This is mainly because all of the plots are quite wide measuring at least 13.8m.

As the proposed development would use Chapel Lane for its access, it would be most associated with the three bungalows opposite but this part of Beanacre is characterised by a mixture of two and single storey development (as seen in the site photographs above).

The indicative site plan demonstrates that the plot sizes are generous, however such detailed matters would be considered at reserved matters stage.

#### Impact on Ecology and BNG:

The Council's Ecology Officer has no objection to the proposal stating;

*"The \*submitted\* surveys outline the sites low potential to support protected species and confirms the likely absence of reptiles on site.*

*Core Policy 50 of the Wiltshire Core Strategy requires all development to demonstrate no net loss of biodiversity and encourages developments to seek opportunities to enhance biodiversity. A number of enhancement proposals have been provided to include habitat creation in the form of hedgerows, grassland and standing trees and these are included within the Landscape Proposals plan. The inclusion of these features would be in accordance with Core Policy 50.*

*However, additional information on the long-term provision and management of these enhancement measures will be required in the form of a Landscape Environmental Management Plan condition."*

The application was submitted before the 10% biodiversity net gain requirement became law and is therefore exempt.

#### Other matters:



The site is located within a 'Mineral Safeguarding Area' (MSA). Planning Practice Guidance states that when determining planning applications, this should be in accordance with development policy on minerals safeguarding, taking account of the views of the mineral planning authority on the risk of preventing minerals extraction. Minerals Local Plan Policy MDC4 states that proposals for development within Mineral Consultation Areas and Mineral Safeguarding Areas that may prevent or adversely affect current or possible future mineral extraction and/or associated ancillary operations, rail-head facilities, and mineral recycling facilities will be opposed unless:

- An appropriate quantity of mineral can be reasonably extracted prior to or in phase with the proposed non-mineral development such that the extraction does not unreasonably prevent or hinder the non-minerals development; or
- It can be proven that the mineral deposit is unlikely to be worked due to its quality or quantity; or
- The development is of a temporary nature and can be completed and the site restored to a condition that does not inhibit extraction within the timescale that the mineral is likely to be needed; or
- There is an overriding need for the proposed non-minerals development to commence without delay.

Any potential mineral extraction at the site would have environmental impacts on the surroundings including from noise and dust, and visual impact from the extraction works themselves. Given that the site is located next to residential properties, these impacts on nearby receptors would be likely to be significant, and construction of visual buffers would mean that the area of extractable mineral would be further reduced.

In addition, the local infrastructure of single-track roads providing access to the site would require upgrading and widening for access, and disruption to the landscape and neighbouring residents would be significant. As such, the minerals beneath the site are unlikely to be economically viable given the small size of the site, costs associated with reducing visual and auditory disturbance, and upgrading local infrastructure. Based upon the above it is considered that mineral extraction at the site is unlikely to be viable due to a combination of economic and social factors. The scheme is therefore considered to comply with policy MDC4.

## **CONCLUSION:**

Whilst the application is considered to be CP2 compliant in relation to being an infill site and not posing an adverse highway safety risk, the site is subject to flood risk via ground water flooding and therefore requires the application of a sequential test, and has significant issues as to how the site can be adequately drained. Therefore, the tilted balance from the Council not being able to demonstrate a 5 year supply of housing is not engaged.

It is acknowledged that the Council cannot demonstrate a five year housing land supply, however, the delivery of three market dwellings would not add significantly to the housing stock to warrant a recommendation for approval where harm has been identified as set out above, as such only limited to moderate weight can be attributed to the Council's current housing land supply. Benefits to delivering new dwellings in this location include adding new dwellings to the housing stock, short term economic benefits during the construction phase and the addition of new occupiers contributing to the social and economic structure of the local area.

However, the scheme is located within land that is susceptible to ground water flooding, and the proposed drainage strategy is based solely on infiltration, despite monitoring showing groundwater levels within 1 metre of ground level and within 1 metre of the proposed base of infiltration features. This is contrary to best practice guidance, which indicates that infiltration should not be relied upon where the water table is within 1 metre of the base of SuDS features, and therefore the development fails to demonstrate that a viable or sustainable drainage strategy can be achieved.

As such the proposal is considered to fail to comply with Core Policies 57 and 67 of the Wiltshire Core Strategy (Flood Risk), saved Policy U1a of the West Wiltshire District Local Plan (1st Alteration) 2004 (Foul Water Disposal), and paragraphs 173, 174 and 175 of the National Planning Policy Framework (2024). There are no identified benefits that would outweigh the conflict, and the application should therefore be refused.

**RECOMMENDATION:** Refuse for the following reason:

*The submitted groundwater monitoring results demonstrate that 100% of the application site lies within Flood Risk Category 2 (high risk of groundwater emergence) as defined by the Wiltshire Council Strategic Flood Risk Assessment (SFRA) 2019. As such, the site cannot be considered to be at a 'low risk' of flooding.*

*In accordance with paragraphs 173–175 of the National Planning Policy Framework (NPPF), where development is proposed in areas at risk of flooding, the sequential test must be applied to steer new development to areas with a lower probability of flooding. No sequential test has been submitted to demonstrate that there are no reasonably available sites with a lower risk of flooding within Wiltshire to accommodate the development.*

*In addition, the proposed drainage strategy is based solely on infiltration, despite monitoring showing groundwater levels within 1 metre of ground level and within 1 metre of the proposed base of infiltration features. This is contrary to best practice guidance, which indicates that infiltration should not be relied upon where the water table is within 1 metre of the base of SuDS features, and therefore the development fails to demonstrate that a viable or sustainable drainage strategy can be achieved.*

*As such, the proposal fails to demonstrate that the development is appropriately located in flood risk terms and fails to provide a credible drainage solution. The application is therefore contrary to Core Policy 67 of the Wiltshire Core Strategy (Flood Risk), saved Policy U1a of the*

*West Wiltshire District Local Plan (1st Alteration) 2004 (Foul Water Disposal), and paragraphs 173, 174 and 175 of the National Planning Policy Framework (2024).*

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Mrs Teresa Strange  
Melksham Without Parish Council  
Melksham Without Parish Council  
First Floor, Melksham Community Campus  
Market Place  
Melksham  
Wiltshire  
SN12 6ES

Tuesday 03 June 2025

Dear Mrs Teresa Strange

**Lime Down Solar Park**

**Targeted Consultation**

**Section 42 of the Planning Act 2008 ('the 2008 Act'), Regulation 3 of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 and Regulations 11 and 13 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 ('the 2017 Regulations')**

**Notice publicising a proposed application for a Development Consent Order ("DCO") to construct, operate, maintain and decommission a solar photovoltaic (PV) generating station, with a generating capacity of more than 50 megawatts (MW) and associated infrastructure on land in Wiltshire (Lime Down Solar Park).**

Notice is hereby given that Lime Down Solar Park Limited (Company registration number 13211532) of Unit 25.7 Coda Studios, 189 Munster Road, London, England SW6 6AW (the Applicant), proposes to apply to the Secretary of State (SoS) for Energy Security and Net Zero under Section 37 of the Planning Act 2008 for a Development Consent Order for the Lime Down Solar Park (the Application).

The Preliminary Environmental Information Report (PEIR) published at Stage Two Statutory Consultation for Lime Down Solar Park (Project) identified a combined area of approximately 2,835 hectares as being required, comprising the following sites:

- Lime Down A, B, C, D, E: five solar array sites located in Wiltshire currently comprising 878 hectares which lie to the north of the M4, southwest of Malmesbury, between the villages of Alderton, Luckington, Sherston, Foxley, Norton, Corston, Startley, Upper Seagry, Lower Stanton St Quintin and Hullavington.

- The solar array sites will include solar panels, conversion units, inverters, and up to five 33 kV substations located in Lime Down A to E and up to three 132 kV substations located in Lime Down A, C and E. There will be one 400 kV substation located within Lime Down D.
- One or two Battery Energy Storage System (BESS) areas, both of which will be located within Lime Down D.
- A cable route search area has been identified for the underground electricity cables connecting the Lime Down A to E solar array sites, substations, and the BESS to the national grid at the existing Melksham Substation, comprising an area of approximately 1,947 hectares.
- Associated infrastructure, mitigation and enhancement measures, and other ancillary works, for example, fencing, security, local grid connections, temporary access roads, permanent means of access, highway works, temporary works compounds and work sites.

At PEIR, Lime Down Solar Park was located entirely within the administrative boundary of Wiltshire Council. The Solar PV Sites are located across several parishes:

- Lime Down A is located within the civil parish of Sherston approximately 735 metres to the southeast of Sherston;
- Lime Down B is located within the civil parish of Norton approximately 3.9km to the west of Malmesbury;
- Lime Down C is located withing the civil parishes of Sherston, Luckington, Hullavington, and Norton approximately 3.3km to the south of Sherston;
- Lime Down D, which incorporate the proposed BESS areas, is located in the civil parishes of Norton and Hullavington approximately 4km to the southwest of Malmesbury; and
- Lime Down E is located within the civil parish of St Paul Malmesbury Without approximately 4.4km to the south of Malmesbury.

The proposed DCO will, among other things, authorise:

- Construction, operation, maintenance and decommissioning of the solar PV electricity generating station and associated development including grid connection and energy storage facility;
- Compulsory acquisition of land, including interests in land, rights over land and imposition of restrictions, powers to override, suspend or extinguish rights over land and powers for the temporary use of land;
- The application, modification and/or disapplication of legislation including legislation relating to compulsory purchase and landlord and tenant; and
- Such ancillary, incidental and consequential provisions, licenses, property rights, permits and consents as are necessary and/or convenient.

Lime Down Solar Park is an Environmental Impact Assessment (EIA) development for the purposes of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. This means that the proposed works constitute development for

which an EIA is required and the proposed application for a DCO will therefore be accompanied by an Environmental Statement. The Environmental Statement will provide a detailed description of Lime Down Solar Park and its likely significant environmental effects. Information compiled so far about Lime Down Solar Park's likely significant environmental effects is set out for consultation in a Preliminary Environmental Information Report (the PEIR) and summarised in a Non-Technical Summary (NTS).

### **Targeted Consultation on Lime Down Solar Park**

The Applicant is carrying out a further round of targeted consultation for the Project, focusing on fifteen specific changes, which have resulted in small increases to the development boundary area compared to the boundary presented in the PEIR for Stage Two Statutory Consultation. Each of the fifteen changes comprises an amendment to the development boundary area of between 0.03 ha and 0.69 ha, representing a total additional area of 3.24 ha since the PEIR.

Following the fifteen changes, Lime Down Solar Park is located predominantly within the administrative boundary of Wiltshire Council with two additional areas within the administrative area of South Gloucestershire. We are holding this round of consultation from **Tuesday 03 June until 23:59 on Friday 11 July 2025**. During this time, you have the opportunity to comment on these changes to the Project. We encourage you to submit any feedback you may have using the details provided at the end of this letter.

To summarise, the changes comprise:

- Six areas to enable the temporary highway and traffic works that would be required to safely accommodate the Abnormal Indivisible Load (AIL) vehicles needed during the construction phase of the Project.
- Nine areas where the proposed development boundary area has been adjusted to enable access to and within the Project site, and to avoid constraints such as woodland and hedgerows.

Although these changes are minor in nature and scale, we are committed to ensuring that relevant stakeholders are consulted on the changes prior to the DCO application being submitted.

We anticipate submitting our DCO application to the Planning Inspectorate on 19 September 2025. The DCO application will show any changes and refinements made in response to the feedback received during the Stage Two Statutory Consultation, as well as this phase of further targeted consultation.

We are writing to you as you have been identified as a consultee for the purpose of section 42(1)(a) of the 2008 Act as a prescribed person(s) in respect of the targeted consultation. If you are a newly identified consultee and did not receive a letter as part of the statutory consultation, please refer to the enclosed section 48 notice.

This targeted consultation also includes:

- Consultation with any persons with an interest in the land affected by the proposed changes (under section 42 and section 44 of the 2008 Act);
- Consultation with relevant prescribed bodies, host, and neighbouring authorities (under section 42 and section 43 of the 2008 Act); and
- Consultation with the local community in the vicinity of the proposed changes (within a minimum distance of 200 metres of the relevant areas). This aligns with consultation under the 2008 Act.

Hard copies of the PEIR, NTS and maps and plans from the statutory consultation remain available for inspection free of charge at two of the community venues listed below: Chippenham Library and Malmesbury Library. Details of these locations, how to request these documents and any related charges are set out in the enclosed section 48 notice that related to the statutory consultation.

### **Targeted consultation materials**

The Applicant has published an Information Change Note on the proposed changes on the Project website for this targeted consultation. The document includes an overview of the changes, maps showing the changes and the land affected. Information on any updates to the reporting of likely significant environmental effects is also presented. The Information Change Note is free to read and download from the Documents section of the Project website ([www.limedownsolar.co.uk](http://www.limedownsolar.co.uk)).

The Applicant has notified properties in the vicinity of the proposed changes about the targeted consultation. The Applicant has also produced a dedicated Feedback Form (available online and in hard copy) and is accepting feedback in writing via Freepost and email via the Project-dedicated communications lines. Verbal representations will also be possible by appointment with the Project team (contact details listed at the end of this letter).

Hard copies of the targeted consultation materials (Information Change Note, Feedback Form) are available upon request by using the contact details listed at the end of this letter, and for inspection free of charge from 03 June to 11 July 2025 at the local venues listed below, which include the four Community Access Points listed in the published Statement of Community Consultation and an additional two further locations in proximity to the changes (Chipping Sodbury Community Library and Yate Library).



Venue and address	Opening times*
<b>Corsham Library</b> Springfield Community Campus Beechfield Road Corsham, Wiltshire SN13 9DN T: 01249 468 490	Mon (staffed): 09:00 – 19:00 Tues (staffed): 09:00 – 17:00 Weds (staffed): 09:00 – 17:00 Thurs (staffed): 09:00 – 17:00 Fri (staffed): 09:00 – 19:00 Sat (staffed): 09:00 – 17:00 Sun (not staffed).
<b>Melksham Library</b> Melksham Community Campus Market Place Melksham, Wiltshire SN12 6ES T: 01225 702 039	Mon (staffed): 09:30 – 19:00 Tues (staffed): 09:30 – 17:00 Weds (not staffed). Thurs (staffed): 09:30 – 17:00 Fri (staffed): 09:30 – 19:00 Sat (staffed): 09:00 – 17:00 Sun (not staffed).
<b>Malmesbury Library</b> 24 Cross Hayes Malmesbury, Wiltshire SN16 9BG T: 01666 823 611	Mon: 14:30 – 19:00 Tues: 09:30 – 17:00 Weds: 09:30 – 17:00 Thurs: closed Fri: 09:30 – 19:00 Sat: 09:00 – 17:00 Sun: closed
<b>Chippenham Library</b> Timber Street Chippenham, Wiltshire SN15 3EJ T: 01249 650 536	Mon: 10:00 – 19:00 Tues: 09:00 – 17:00 Weds: 09:00 – 13:00 Thurs: 09:00 – 19:00 Fri: 09:00 – 19:00 Sat: 09:00 – 17:00 Sun: closed
<b>Chipping Sodbury Community Library</b> High Street Chipping Sodbury South Gloucestershire, Bristol BS37 6AH T: 01454 868 006	Mon: closed Tues: 09.30 – 12.30; 13.30 – 16.30 Weds: 09.30 – 12.30; 13.30 – 16.30 Thurs: closed Fri: 09.30 – 12.30 Sat: 09.30 – 12.30 Sun: closed
<b>Yate Library</b> Unit 44, Yate Shopping Centre West Walk Yate, Bristol BS37 4AX T: 01454 868 006	Mon (staffed): 10.00 – 17.00 Tues (staffed): 10.00 – 17.00 Weds (unstaffed). Thurs (staffed): 10.00 – 17.00 Fri (staffed): 10.00 – 17.00 Sat (staffed): 09.30 – 12.30 Sun (unstaffed).
<b>*Opening hours can change and documents may only be available for inspection or viewing on a computer during staffed hours. We recommend contacting the venues prior to visiting to confirm opening hours and Targeted consultation document availability.</b>	

### **Targeted consultation events**

The Applicant will hold an online information event during the consultation period, on Thursday 19 June 2025 from 18:30 to 20:00. If you would like to attend, details of how to register to attend can be found on [www.limedownsolar.co.uk](http://www.limedownsolar.co.uk)

### **How to respond to this targeted consultation**

#### **Any person may comment on the DCO application.**

When providing your response, please include your name and contact details (postal or email address) and confirm the nature of your interest in the DCO application. Completed responses must be submitted:

- a) By email to [info@limedownsolar.co.uk](mailto:info@limedownsolar.co.uk); or
- b) In writing to FREEPOST LIME DOWN SOLAR (no stamp or further details required).

#### **Responses must be received no later than 23:59 on 11 July 2025.**

The Applicant will consider all responses received on or before this date. Responses received after this time may not be considered.

Responses and representations will be included in the Consultation Report, which will be submitted as part of the DCO application.

Responses may be made public or made available to the SoS, the Planning Inspectorate, and other relevant statutory bodies, in accordance with the requirements of the 2008 Act and data protection legislation. Personal details will be kept confidential where possible and only used for purposes in connection with the statutory consultation, the DCO process and further development of Lime Down Solar Park. You do not have to provide any personal information, but this information will help the Applicant to understand the range of responses and enable the Applicant to send you further information relating to the Lime Down Solar Park.

Your views are also likely to be recorded or paraphrased in the Consultation Report which will be submitted with the DCO application. Please refer to our Privacy Notice for more details: <https://www.limedownsolar.co.uk/privacy-policy>

**Further information**

If you would like further information about this letter, the consultation, or the Lime Down Solar Park, please contact the Applicant project team by using one of the contact methods provided below:

**Emailing:** [info@limedownsolar.co.uk](mailto:info@limedownsolar.co.uk)

**Calling our Freephone:** [0808 175 6656](tel:0808 175 6656)

**Visiting our website at:** <https://www.limedownsolar.co.uk/>.

Yours faithfully,

*W Threlfall*

Will Threlfall  
Senior Project Development Manager  
On behalf of Lime Down Solar Park Limited



# SECTION 48 PLANNING ACT 2008 REGULATION 4 OF THE INFRASTRUCTURE PLANNING (APPLICATIONS: PRESCRIBED FORMS AND PROCEDURE) REGULATIONS 2009.

**Notice publicising a proposed application for a Development Consent Order ("DCO") to construct, operate, maintain and decommission a solar photovoltaic (PV) generating station, with a generating capacity of more than 50 megawatts (MW) and associated infrastructure on land in Wiltshire (Lime Down Solar Park).**

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- The solar array sites will include solar panels, conversion units, inverters, up to five 33 kV substations located in Lime Down A to E and up to three 132 kV substations located in Lime Down A, C and E. There will be one 400 kV substation located within Lime Down D.
- One or two Battery Energy Storage System (BESS) areas, both of which will be located within Lime Down D.
- A cable route search area has been identified for the underground electricity cables connecting the Lime Down A to E solar array sites, substations and the BESS to the national grid at the existing Melksham Substation, currently comprising 1,947 hectares; and,
- Associated infrastructure, mitigation and enhancement measures, and other ancillary works, for example, fencing, security, local grid connections, temporary access roads, permanent means of access, highway works, temporary works compounds and work sites.

Lime Down Solar Park is located entirely within the administrative boundary of Wiltshire Council. The solar PV sites are located across several parishes:

- Lime Down A is located within the civil parish of Sherston approximately 735 metres to the southeast of Sherston;
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- Lime Down E is located within the civil parish of St Paul Malmesbury Without approximately 4.4km to the south of Malmesbury.

The proposed DCO will, among other things, authorise:

- Construction, operation, maintenance and decommissioning of the solar PV electricity generating station and associated development including grid connection and energy storage facility;
- Compulsory acquisition of land, including interests in land, rights over land and imposition of restrictions, powers to override, suspend or extinguish rights over land and powers for the temporary use of land;
- The application, modification and/or disapplication of legislation including legislation relating to compulsory purchase and landlord and tenant; and
- Such ancillary, incidental and consequential provisions, licenses, property rights, permits and consents as are necessary and/or convenient.

Lime Down Solar Park is an Environmental Impact Assessment (EIA) development for the purposes of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. This means that the proposed works constitute development for which an EIA is required and the proposed application for a DCO will therefore be accompanied by an Environmental Statement. The Environmental Statement will provide a detailed description of Lime Down Solar Park and its likely significant environmental effects. Information compiled so far about Lime Down Solar Park's likely significant environmental effects is set out for consultation in a Preliminary Environmental Information Report (the PEIR) and summarised in a Non-Technical Summary (NTS).

## Statutory Consultation

The Applicant is undertaking a statutory consultation on the proposals for Lime Down Solar Park between 29 January and 19 March 2025.

A copy of the PEIR, together with the PEIR NTS, the Statement of Community Consultation (SoCC), and other consultation documents, plans and maps explaining the statutory consultation process and details of the nature and location of Lime Down Solar Park can be found on the Applicant's website in the document library at [www.limedownsolar.co.uk](http://www.limedownsolar.co.uk). These documents will be free to read and download from the Applicant's website from 29 January to 19 March 2025.

Hard copies of the SoCC, PEIR, PEIR NTS, maps and plans will be available for inspection free of charge from 29 January until 19 March 2025 at the following community access points:

Venue and address	Opening times
<b>Corsham Library</b> , Springfield Community Campus, Beechfield Road, Corsham, Wiltshire, SN13 9DN T: 01249 468 490	Mon, Fri (staffed): 09:00 - 19:00 Tues, Weds, Thurs, Sat (staffed): 09:00 - 17:00 Sun (not staffed):
<b>Melksham Library</b> , Melksham Community Campus, Market Place Melksham, Wiltshire, SN12 6ES I: 01225 702 039	Mon, Fri (staffed): 09:30 - 19:00 Tues, Thurs, Sat (staffed): 09:30 - 17:00 Weds, Sun (not staffed):
<b>Malmesbury Library</b> , 24 Cross Hayes Malmesbury, Wiltshire, SN16 9BG T: 01666 823 611	Mon: 14:00 - 19:00 Tues, Weds, Sat: 09:30 - 17:00 Thurs, Sun: closed Fri: 09:30 - 19:00
<b>Chippenham Library</b> , Timber Street Chippenham, Wiltshire, SN15 3EJ T: 01249 650 536	Mon: 10:00 - 19:00 Tues, Sat: 09:00 - 17:00 Weds: 09:00 - 13:00 Thurs, Fri: 09:00 - 19:00 Sun: closed

Form will be available to take away free of charge. Please note that due to limited space at Corsham Library and Melksham Library hard copies of the consultation materials will only be available to view during staffed hours when it is possible to request assistance from a member of staff to provide access to the documents.

Electronic copies of all the consultation documents may be viewed on a computer at the above community access points from 29 January until 19 March 2025. While access to computers at these information points is free of charge, the venues require visitors to show proof of identity to use an on-site computer. More information is available at [www.wiltshire.gov.uk/libraries-accessing-computers](http://www.wiltshire.gov.uk/libraries-accessing-computers). We recommend contacting the venues to check the opening times prior to visiting.

The Applicant will host public information events to provide interested parties with the opportunity to view the relevant consultation documentation and speak with members of the project team. The details of the consultation events are as follows:

Date and time	Location
<b>Wed 05 February 2025</b> 18:30 - 20:00	<b>Online - Zoom</b> - register to attend via Project website <a href="http://www.limedownsolar.co.uk">www.limedownsolar.co.uk</a>
<b>Fri 07 February 2025</b> 14:30 - 19:30	<b>Sherston Village Hall</b> , High Street, Sherston, Malmesbury, SN16 0LQ
<b>Sat 08 February 2025</b> 11:00 - 15:00	<b>Hullavington Village Hall</b> , Hill Hayes Lane, Hullavington, Chippenham, SN14 6EB
<b>Wed 12 February 2025</b> 14:30 - 19:30	<b>Grittleton Village Hall</b> , The Street, Grittleton, Chippenham, SN14 6AW
<b>Thurs 13 February 2025</b> 14:30 - 19:30	<b>Corsham Town Council Hall</b> , Town Hall, 65 High Street, Corsham, SN13 0EZ
<b>Fri 14 February 2025</b> 14:30 - 19:30	<b>Malmesbury Town Hall</b> , Cross Hayes, Malmesbury, SN16 9BZ
<b>Sat 15 February 2025</b> 11:00 - 15:00	<b>Luckington Village Hall</b> , Bristol Road, Luckington, Chippenham, SN14 6NP
<b>Tues 25 February 2025</b> 14:30 - 19:30	<b>Goss Croft Hall</b> , Startley Road, Upper Seagry, Chippenham, SN15 5HD
<b>Wed 26 February 2025</b> 17:30 - 20:30	<b>Shaw CofE Primary School</b> , Corsham Road, Shaw, Melksham, SN12 8EQ
<b>Thurs 27 February 2025</b> 18:30 - 20:00	<b>Online - Zoom</b> - register to attend via Project website <a href="http://www.limedownsolar.co.uk">www.limedownsolar.co.uk</a>

These consultation events offer an opportunity to find out more about Lime Down Solar Park. Attendees do not need to register in advance to attend an in-person consultation event. To attend an online event attendees need to go to the Project website where they will be able to sign up in advance. Alternatively joining details can be provided by contacting the project team on FREEPHONE 0808 175 6656 or sending an email to [info@limedownsolar.co.uk](mailto:info@limedownsolar.co.uk).

For further information or queries, please call 0808 175 6656 (free of charge); write to FREEPOST LIME DOWN SOLAR (no stamp or further details required); email [info@limedownsolar.co.uk](mailto:info@limedownsolar.co.uk) or visit [www.limedownsolar.co.uk](http://www.limedownsolar.co.uk).

To obtain hard copies of the consultation documents

Hard copies of all other consultation materials may be requested during the consultation period by contacting the Applicant on FREEPHONE 0808 175 6656 or by email at [info@limedownsolar.co.uk](mailto:info@limedownsolar.co.uk). Requests for consultation materials in an alternative format such as large print or audio for those with visual impairments or in an alternative language for those who do not speak English as their first language will be considered on a case-by-case basis. Requests for multiple copies of these documents will be considered on a case-by-case basis and a reasonable charge may apply to cover printing and postage costs.

Requests for a printed hard copy of the PEIR will be reviewed on a case-by-case basis. To cover printing and postage costs, a charge of up to £4,874.00 may apply. (The charge will be calculated based on cost per individual volume requested as follows: Volume 1 - Main Report, £1896.00, Volume Two - Figures, £700.00 and Volume Three - Appendices, £3,278.00).

Have your say

Feedback can be provided through the consultation feedback form on the Applicant's website at [www.limedownsolar.co.uk](http://www.limedownsolar.co.uk). Hardcopy feedback forms will also be available at the community access points listed above and at the in-person public information events taking place.

The consultation feedback form, responses to the consultation or other representations in respect of Lime Down Solar Park can also be sent to the Applicant by email to [info@limedownsolar.co.uk](mailto:info@limedownsolar.co.uk) or by post to FREEPOST Lime Down Solar (no stamp or further details required).

Any response or representation in respect of the proposed DCO application must be received by the Applicant on or before 23.59 on Wednesday 19 March 2025.

The Applicant will consider and have regard to all responses to consultation and publicity when developing its DCO application. Individual responses may be made publicly available, or made available to the Secretary of State, the Planning Inspectorate and other relevant statutory authorities, in accordance with the requirements of the Planning Act 2008 and data protection legislation.

Respondents do not have to provide any personal information, but this information will help the Applicant to understand the range of responses and enable the Applicant to send you further information relating to the Lime Down Solar Park. Personal information will be kept confidential where possible. Please refer to our Privacy Notice for more details: [www.limedownsolar.co.uk/privacy-policy](http://www.limedownsolar.co.uk/privacy-policy).





# Targeted Consultation Information Change Note

June 2025

We are inviting your feedback on a series of localised changes we are proposing to our plans for Lime Down Solar Park.

**This stage of targeted consultation will run from Tuesday 03 June to Friday 11 July 2025.**

The localised changes we are proposing have been informed by further design work and due diligence, ongoing consideration of feedback submitted to our Stage Two statutory consultation, and findings from the Environmental Impact Assessment (EIA).

More information about the EIA process is available on our website at [www.limedownsolar.co.uk/environmental-impact-assessment](http://www.limedownsolar.co.uk/environmental-impact-assessment)

These localised changes relate to minor amendments to the development boundary area for the Project, compared to the boundary which we consulted you on during our Stage Two consultation (Jan – Mar 2025).

The changes comprise:

- + Six areas to enable the temporary highway and traffic works that would be required to safely accommodate the Abnormal Indivisible Load (AIL) vehicles needed during the construction phase of the Project.
- + Nine areas where the development boundary has been adjusted to enable access to and within the Project site, and to avoid constraints such as woodland and hedgerows.

Although these changes are minor in nature and scale, we are committed to ensuring communities and consultees have had an opportunity to comment on the changes prior to the Development Consent Order (DCO) application being submitted.

## Inside this booklet you will find:

- + Overview of Lime Down Solar Park
- + Site map showing localised changes
- + Description of individual changes and why they are being proposed
- + Further information on Abnormal Indivisible Loads
- + How to have your say
- + Next steps
- + Contact details



# About Lime Down Solar Park

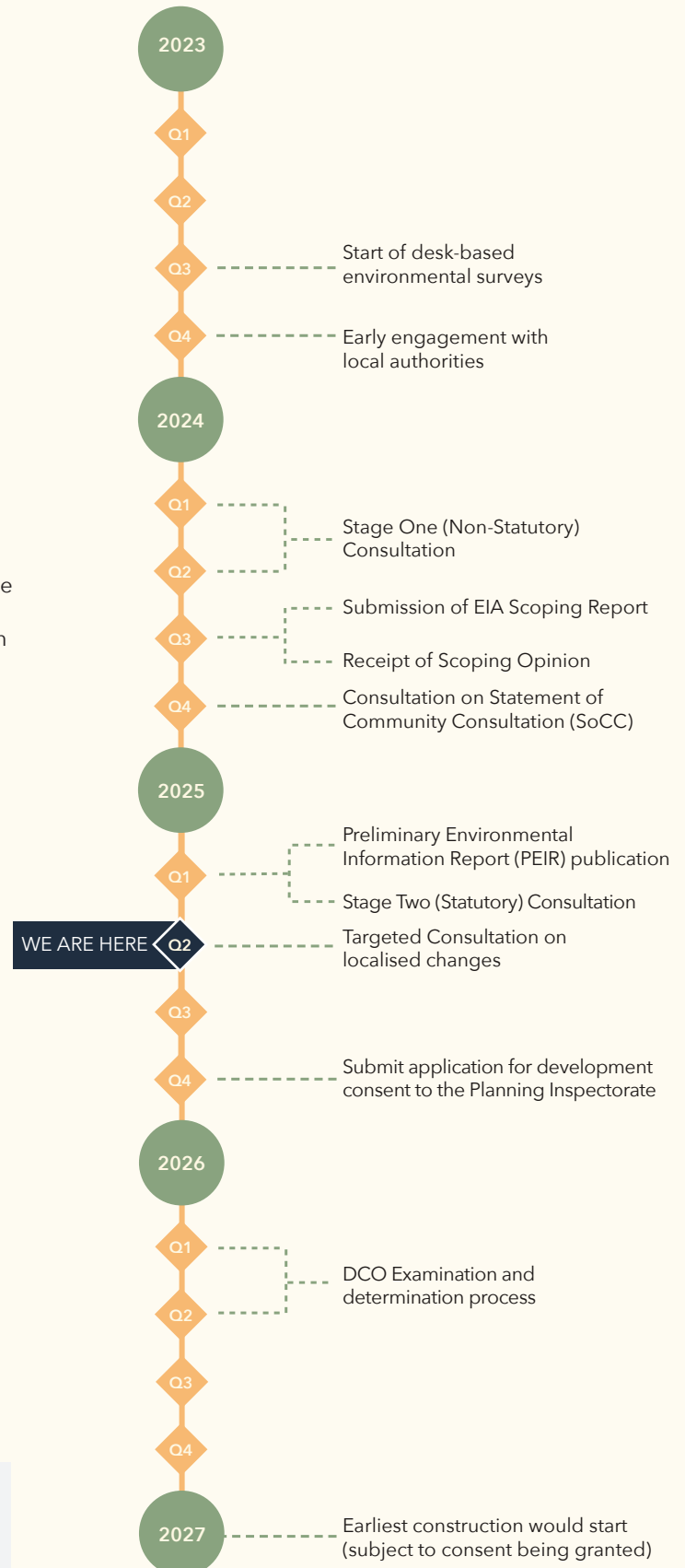
Lime Down Solar Park is a utility-scale solar park and battery energy storage project proposed to be built on land in Wiltshire. The Project involves the installation of solar panels and an on-site battery energy storage facility, with an underground cable connection into the National Grid at Melksham substation. Electricity generated would be made available for homes and businesses across the UK.

If consented, the solar park could deliver up to 500 megawatts (MW) of renewable energy. This is equivalent to providing enough clean affordable electricity to power approximately 115,000 homes annually.

As its generation capacity exceeds 50MW, it is classified as a Nationally Significant Infrastructure Project (NSIP). The development consenting regime for an NSIP comes under the Planning Act 2008. This means that we need to submit an application for a Development Consent Order (DCO) to build, operate and decommission Lime Down Solar Park to the Planning Inspectorate rather than the local planning authority.

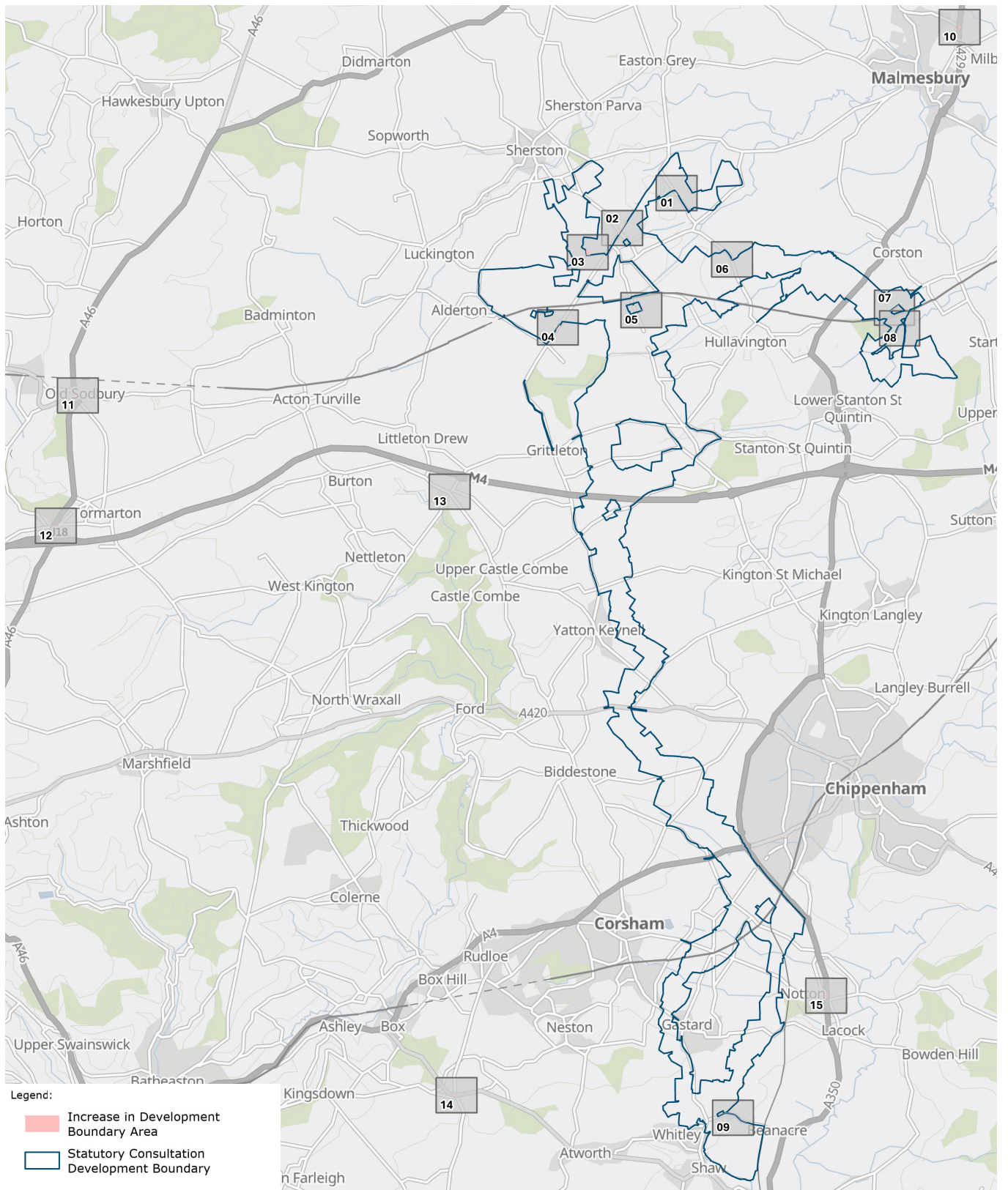
In the case of energy related NSIPs, the Planning Inspectorate acts on behalf of the Secretary of State for Energy and Net Zero. The Planning Inspectorate will carry out an examination of our application and then make a final recommendation to the Secretary of State on whether to grant consent. The Secretary of State will make the final decision on whether to grant consent for Lime Down Solar Park.

You can view where we are at in the development process in the indicative timeline to the right.



For more information on the next steps for Lime Down Solar Park, go to page 12.


# Localised changes to development boundary area



# Individual Revisions

1

Statutory Consultation development boundary with localised changes



**Location of change - Road north of Norton, Lime Down B**


**Why the change was proposed:**  
Design and engineering

**Description of change:**  
The development boundary area has been amended to provide a wider area within which cables will be laid. This will allow optimal locating of cables to avoid constraints.

**Total area of change:**  
0.12 ha (0.3 acres)

2

Statutory Consultation development boundary with localised changes




**Location of change - Fosse Way, Lime Down B**

**Why the change was proposed:**  
Transport and access requirements

**Description of change:**  
The development boundary area has been amended to accommodate the potential for temporary minor junction widening, temporary removal of street furniture and vegetation removal.

This will allow an abnormal load vehicle to turn at the corner and provide sufficient visibility for vehicles to safely access the Site.

**Total area of change:**  
0.55 ha (1.37 acres)

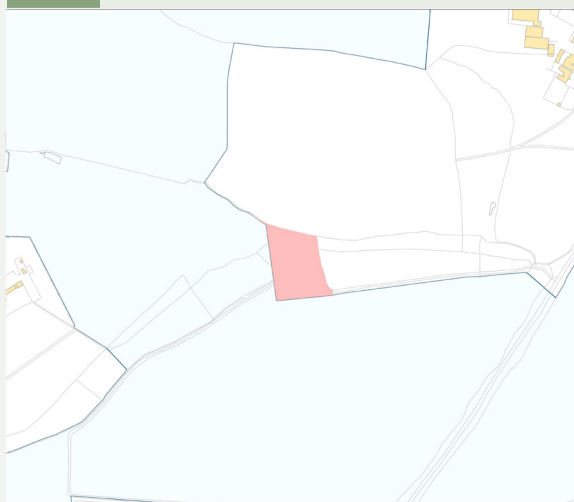


For further information on Abnormal Indivisible Loads (AIL) please turn to page 11.

A map showing the proposed AIL routes is available on our Project website.

3

## Statutory Consultation development boundary with localised changes



Location of change - Land between Lime Down A and Lime Down C

**Why the change was proposed:**

Design and engineering

**Description of change:**

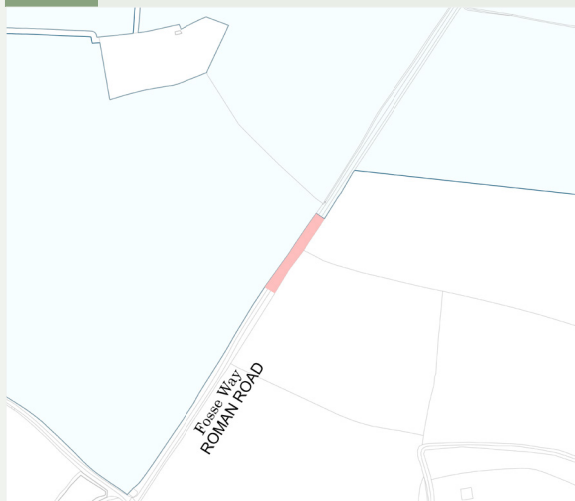
The development boundary area has been amended to provide a wider area within which cables will be laid. This will allow optimal location of cables to avoid constraints.

**Total area of change:**

0.69 ha (1.71 acres)

4

## Statutory Consultation development boundary with localised changes



Location of change - Fosse Way, Lime Down C

**Why the change was proposed:**

Transport and access requirements

**Description of change:**

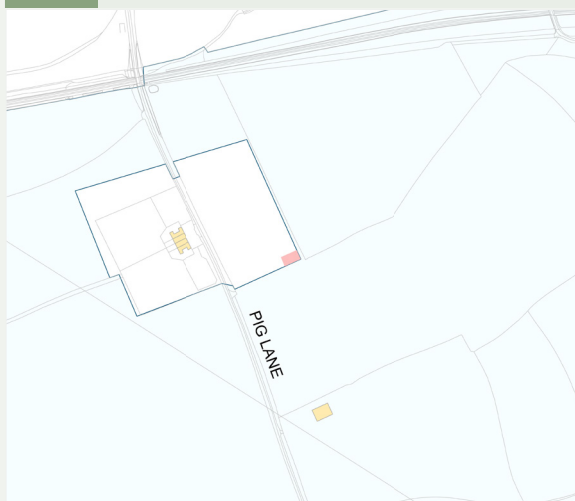
The development boundary area has been amended to accommodate the potential for areas of vegetation removal along the highway. This will ensure there is sufficient visibility for vehicles to safely access the Site.

**Total area of change:**

0.18 ha (0.44 acres)

5

## Statutory Consultation development boundary with localised changes



Location of change - East of Pig Lane, Lime Down C

**Why the change was proposed:**

Transport and access requirements

**Description of change:**

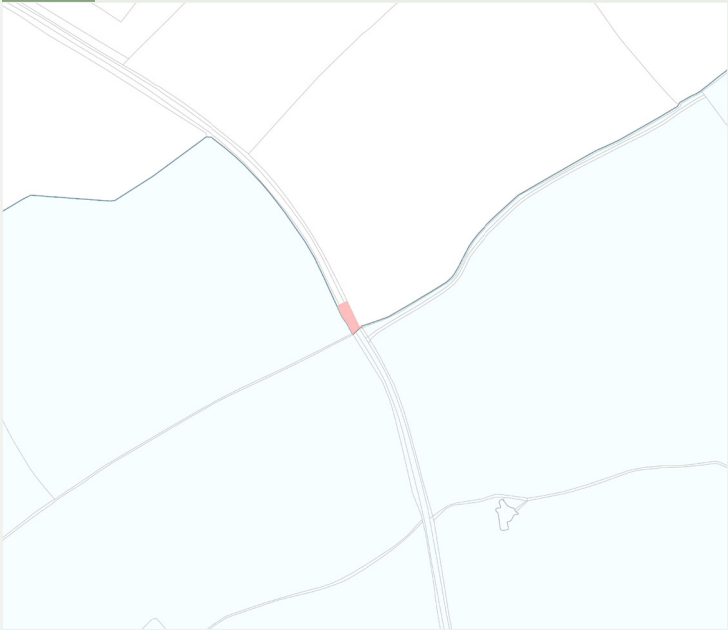
The development boundary area has been amended to ensure there is enough space for an internal access track.

**Total area of change:**

0.03 ha (0.08 acres)

6

Statutory Consultation development boundary with localised changes



Location of change - Bradfield Cottages, Lime Down D

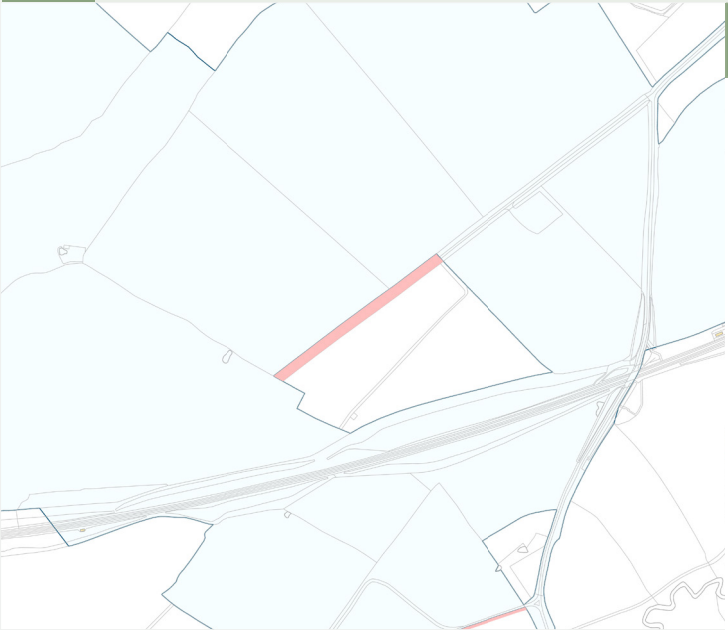
**Why the change was proposed:**  
Transport and access requirements

**Description of change:**  
The development boundary area has been amended to accommodate constructing a site access. This will ensure there is sufficient space for vehicles to safely access the Site.

**Total area of change:**  
0.04 ha (0.09 acres)

7

Statutory Consultation development boundary with localised changes



Location of change - South west of Rodbourne, Lime Down E

**Why the change was proposed:**  
Transport and access requirements

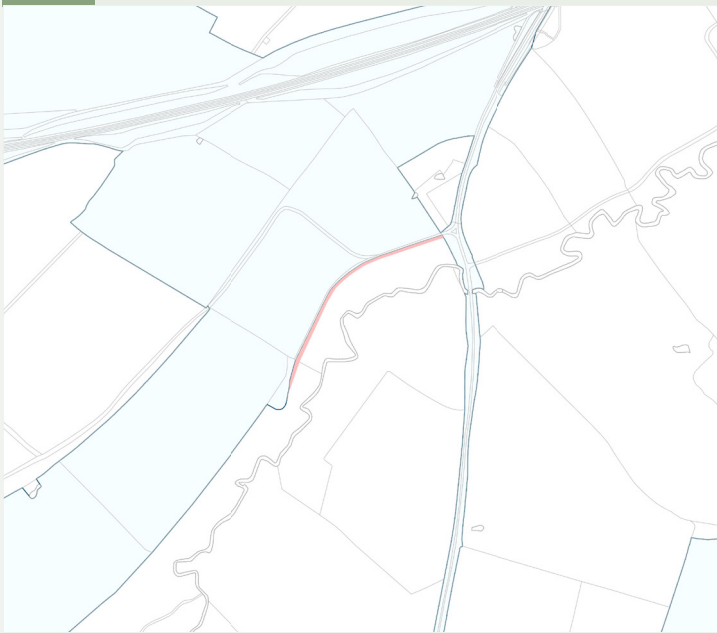
**Description of change:**  
The development boundary area has been amended to ensure that there is enough space for an internal access route. This is to allow utilisation of an existing track.

**Total area of change:**  
0.25 ha (0.61 acres)



## 8

## Statutory Consultation development boundary with localised changes



Location of change - South of Rodbourne, Lime Down E

**Why the change was proposed:**

Transport and access requirements

**Description of change:**

The development boundary area has been amended to ensure that there is enough space for an internal access route. This is to allow utilisation of an existing track.

**Total area of change:**

0.09 ha (0.21 acres)

## 9

## Statutory Consultation development boundary with localised changes



Location of change - Westlands Lane, Melksham

**Why the change was proposed:**

Design and engineering

**Description of change:**

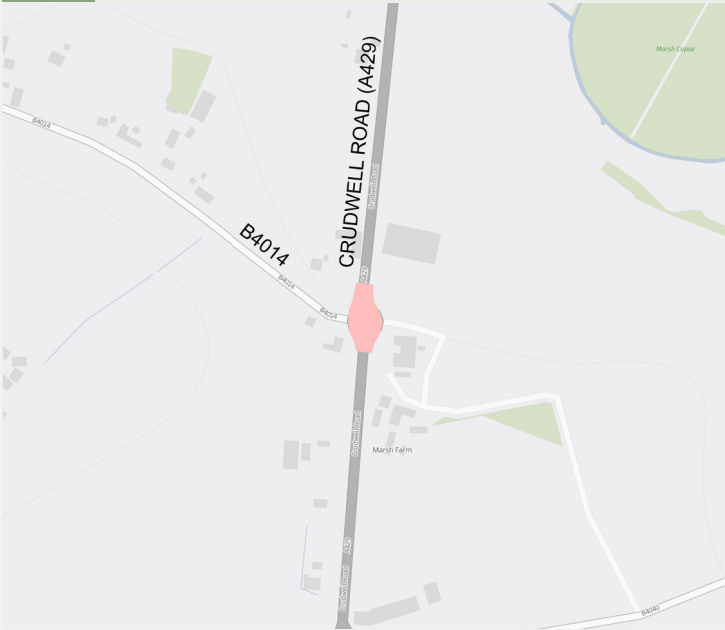
The development boundary area has been amended to accommodate space for the routing of cables. This will allow optimal locating of cables on the approach to the existing National Grid Melksham Substation.

**Total area of change:**

0.41 ha (1.02 acres)

10

Statutory Consultation development boundary with localised changes



Location of change - A429 / B4014 roundabout

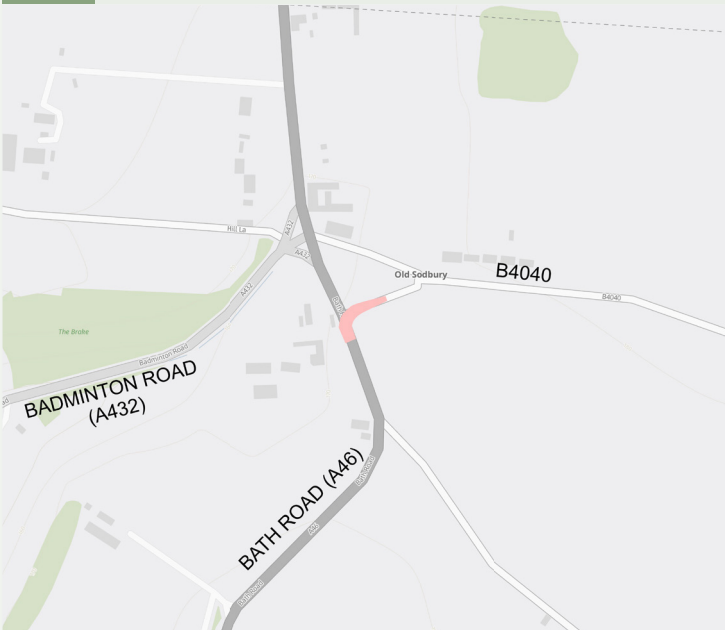
**Why the change was proposed:**  
Transport and access requirements

**Description of change:**  
The development boundary area has been amended to accommodate minor junction widening and temporary removal of street furniture. This will allow an abnormal load vehicle to cross the roundabout.

**Total area of change:**  
0.21 ha (0.51 acres)

11

Statutory Consultation development boundary with localised changes



Location of change - A46 Bath Road / B4040 junction

**Why the change was proposed:**  
Transport and access requirements

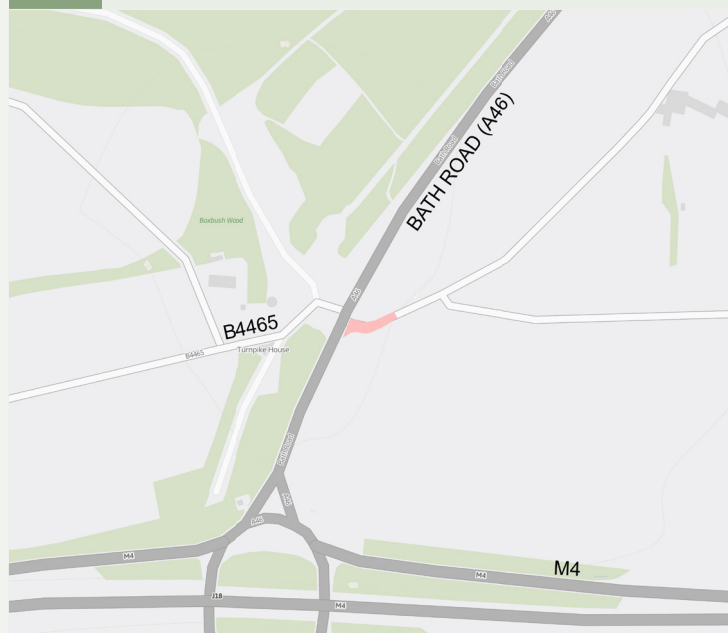
**Description of change:**  
The development boundary area has been amended to accommodate temporary minor junction widening, temporary removal of street furniture and vegetation removal. This will allow abnormal load vehicles to turn at the junction.

**Total area of change:**  
0.09 ha (0.21 acres)



## 12

### Statutory Consultation development boundary with localised changes



Location of change - A46 Bath Road / Acton Turville Road junction

**Why the change was proposed:**  
Transport and access requirements

**Description of change:**  
The development boundary area has been amended to accommodate temporary minor road widening and temporary removal of street furniture. This will allow an abnormal load vehicle to turn at the junction.

**Total area of change:**  
0.06 ha (0.16 acres)

## 13

### Statutory Consultation development boundary with localised changes



Location of change - B4093 / The Gibb crossroads

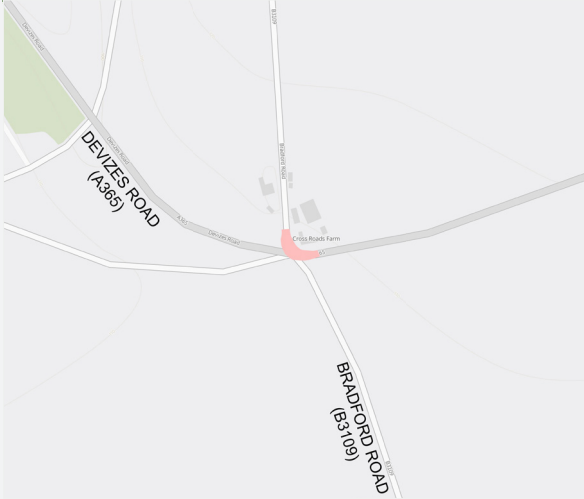
**Why the change was proposed:**  
Transport and access requirements

**Description of change:**  
The development boundary area has been amended to accommodate temporary minor junction widening and vegetation removal. This will allow an abnormal load vehicle to turn at the junction.

**Total area of change:**  
0.07 ha (0.18 acres)

14

Statutory Consultation development boundary with localised changes



Location of change - A365 / B3109 junction (Box Fiveways)


**Why the change was proposed:**  
Transport and access requirements

**Description of change:**  
The development boundary area has been amended to accommodate temporary removal of street furniture. This will allow an abnormal load vehicle to turn at the junction.

**Total area of change:**  
0.10 ha (0.25 acres)

15

Statutory Consultation development boundary with localised changes




Location of change - A350 / Corsham Road junction

**Why the change was proposed:**  
Transport and access requirements

**Description of change:**  
The development boundary area has been amended to accommodate temporary removal of street furniture. This will allow an abnormal load vehicle to turn at the junction.

**Total area of change:**  
0.15 ha (0.37 acres)



ENVIRONMENTAL IMPACT ASSESSMENT

The additional areas and associated activities including their nature, extent and duration have been reviewed as part of the environmental assessment. The additional areas do not change the likely significant effects of the environmental impact assessment that are set out in the Preliminary Environmental Information Report (PEIR), the findings from which we sought views on for our Stage Two statutory Consultation.

# Further information on Abnormal Indivisible Loads

**Abnormal Indivisible Loads (AIL) refer to loads that cannot be divided into smaller, more manageable parts for transportation without risking damage or incurring unreasonable costs. These loads typically exceed standard legal dimensions or weights and require special permissions for road transport within the UK.**

Operators must notify the police, highway authorities, and bridge owners when planning to transport AILs. It is likely that AIL deliveries will require police escorts and/or temporary road closures or diversions on the day of the delivery.

As part of the Project, AIL vehicles will be required for the delivery of the transformers to the proposed substations located in Lime Down A, C, D and E. There will be one AIL delivery per transformer. The number of transformers in each location will be as follows:

- + Lime Down A: 2 x Transformers
- + Lime Down C: 2 x Transformers
- + Lime Down D: 7 x Transformers
- + Lime Down E: 2 x Transformers

This will result in the following number of AIL transformer deliveries on each identified AIL route:

- + Lime Down A&C Substation Route: 4 x AIL deliveries
- + Lime Down D Substation Route: 5 x AIL deliveries
- + Lime Down D&E Substation Route: 4 x AIL deliveries

There may also AIL movements associated with cable route construction to transport the required cable drums. In comparison to the transformer deliveries, these will be delivered by smaller AIL vehicles or HGVs where possible. Each of the eight AIL access route serving the cable route would accommodate approximately 20 AIL deliveries. Where possible, several AIL deliveries will be undertaken at one time in a convoy to minimise disruption.

To ensure minimal impact upon the local road network, AIL vehicle movements will be undertaken during off-peak times.

To accommodate the proposed AIL movements, temporary highway mitigation will be required at certain locations along the identified AIL routes. Temporary highway mitigation would include measures such as laying temporary road surface or providing plates for vehicle overrun. Once the required AIL deliveries have been undertaken, the temporary highway mitigation will be removed and the highway returned to its original layout at the earliest opportunity.

## Have your say

**This targeted consultation is your opportunity to comment on these proposed changes and let us know your views.**

You can submit your feedback until **23:59 on Friday 11 July 2025**. Feedback can be submitted online, in writing, or via email.

- + **Submit comments online:** you can access the online feedback form on the Project website. Any emails sent to [info@limedownsolar.co.uk](mailto:info@limedownsolar.co.uk) during the consultation period will also be considered as feedback.
- + **Fill in a feedback form:** hard copies are available during the consultation at the locations listed on the right. Alternatively, you can ask us to send one to you directly. Then just fill in your details and post it back tous at FREEPOST Lime Down Solar. You do not need a stamp. Any letters sent to this address during the consultation period will also be considered as feedback.

All the comments submitted to this consultation will be acknowledged, recorded, and considered as we finalise our proposals. While we will not be able to respond to you individually, we will address the issues and themes you raise in your feedback to this stage of targeted consultation in our Consultation Report, which will be submitted as part of our application for a Development Consent Order (DCO) to the Planning Inspectorate.



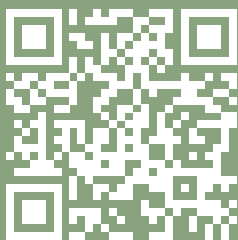
**Hard copies of this Information Change Note and feedback forms are available at:**

- + Corsham Library, Springfield Community Campus, Beechfield Road, Corsham, SN13 9DN
- + Melksham Library, Melksham Community Campus, Market Place, Melksham, Wiltshire, SN12 6ES
- + Malmesbury Library, 24 Cross Hayes, Malmesbury, SN16 9BG
- + Chippenham Library, Timber Street, Chippenham, SN15 3EJ
- + Chipping Sodbury Library, High Street, Chipping Sodbury, Bristol, BS37 6AH
- + Yate Library, Unit 44, Yate Shopping Centre, W Walk, Yate, Bristol, BS37 4AX

**Opening times are dependent on each venue listed and may be subject to change. Please make sure to check these on the day of your visit.**

By appointment with the Project team, you can make a verbal representation over the Project Freephone 0808 175 6656.

Feedback provided will be transcribed and agreed verbally prior to submission. Appointments to provide verbal feedback should be made by contacting the Project team via the Project email address or Project Freephone.



## Next Steps

Feedback from our Stage Two statutory consultation and this stage of targeted consultation will continue to be considered alongside ongoing design and environmental work. This will help us finalise our proposals before submitting an application for development consent to the Planning Inspectorate, anticipated later this year.

Subject to our Application being accepted, you will be able to directly register your interest in our proposals with the Planning Inspectorate. The Planning Inspectorate will then keep you informed about the progress of our application as well as further opportunities for you to inform and contribute to that process.

You can find more information about the application process for Nationally Significant Infrastructure Projects on the Planning Inspectorate website at: [national-infrastructure-consenting.planninginspectorate.gov.uk/detailed-information](https://national-infrastructure-consenting.planninginspectorate.gov.uk/detailed-information)

## Contact us



[info@limesdownsolar.co.uk](mailto:info@limesdownsolar.co.uk)



**Freephone 0808 175 6656**

(open 09.00-17.00 Monday to Friday (excluding bank holidays) with voicemail outside these hours)



**FREEPOST Lime Down Solar**



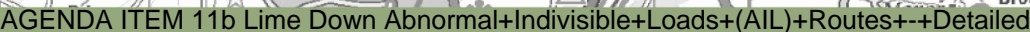
[www.limesdownsolar.co.uk](http://www.limesdownsolar.co.uk)

### Register for updates

If you would like to be kept informed about our Project, please register your details with us by completing the registration form on the Project website or by sending an email to the community relations team.

**If you would like this document in large text or an alternative format please contact us on 0808 175 6656 or send an email to [info@limesdownsolar.co.uk](mailto:info@limesdownsolar.co.uk)**







## Wiltshire's Housing Land Supply Statement Briefing Note No. 25 - 04

**Service:** Planning  
**Further Enquiries to:** Nic Thomas, Director - Planning, Economy and Regeneration  
**Email:** nic.thomas@wiltshire.gov.uk  
**Date Prepared:** 18 June 2025

### BRIEFING NOTE ON HOUSING LAND SUPPLY

#### Summary

We have now completed the update to Wiltshire's housing land supply position. The current position is a **2.42 years** supply using a base date of 1 April 2024. This will be used to inform decision-taking of planning applications and appeals.

This is the first Housing Land Supply Statement to be published since the update to the National Planning Policy Framework (NPPF) was issued on 12 December 2024. This made changes to how housing land supply should be assessed, including the reintroduction of a buffer on the housing requirement, and an update to the calculation by which the housing requirement is established. An update on how the revised NPPF impacts on the council's planning functions is provided in [Briefing Note 24-20](#).

Recent housing delivery in Wiltshire remains strong, with the latest Housing Delivery Test results (from 2023) indicating the council has met **135%** of its housing targets over the past three years.

However, it is imperative that the housing land supply is continually replenished with new planning permissions and site allocations to ensure that housing requirements in the future can be met. Where there is an insufficient housing land supply to meet housing requirements over the next five years (for example, through allocated sites not being brought forward promptly) the council can be exposed to unplanned, 'speculative' planning applications, to help improve the housing land supply.

This briefing note provides information on both these Government measures and what the implications are for decision making.

## 1. Introduction

- 1.1 Government policy as set out in the National Planning Policy Framework (NPPF) includes two measures that are designed to drive the delivery of housing:
- (i) Five-year housing land supply (see below)
  - (ii) Housing Delivery Test
- 1.2 The main difference between the two is that:
- (i) the five-year housing land supply measures the level of 'supply' that can be expected to come forward over a five-year period of time i.e. the number of homes that it is anticipated **will be** built; whereas
  - (ii) the Housing Delivery Test measures the number of homes that **have been** built over a set period.
- 1.3 Both measures have established methodologies and assess the expected delivery of homes, and homes that have been delivered respectively, against the housing requirement for a local authority area. There is no latitude as to how the methods are applied.

## 2. What is the five-year housing land supply?

- 2.1 The latest NPPF (December 2024) sets out how the five-year housing land supply operates. There are two pertinent paragraphs:

### Paragraph 78

*Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old. The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:*

- a) 5% to ensure choice and competition in the market for land; or*
- b) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply; or*
- c) From 1 July 2026, for the purposes of decision-making only, 20% where a local planning authority has a housing requirement adopted in the last five years examined against a previous version of this Framework, and whose annual average housing requirement is 80% or less of the most up to date local housing need figure calculated using the standard method set out in national planning practice guidance.*



## Paragraph 79

*To maintain the supply of housing, local planning authorities should monitor progress in building out sites which have permission. Where the Housing Delivery Test indicates that delivery has fallen below the local planning authority's housing requirement over the previous three years, the following policy consequences should apply:*

- a) where delivery falls below 95% of the requirement over the previous three years, the authority should prepare an action plan to assess the causes of under-delivery and identify actions to increase delivery in future years;*
- b) where delivery falls below 85% of the requirement over the previous three years, the authority should include a buffer of 20% to their identified supply of specific deliverable sites as set out in paragraph 78 of this framework, in addition to the requirement for an action plan;*
- c) where delivery falls below 75% of the requirement over the previous three years, the presumption in favour of sustainable development applies, as set out in footnote 8 of this Framework, in addition to the requirements for an action plan and 20% buffer.*

*Where there has been significant under delivery of housing over the previous three years<sup>1</sup>, the supply of specific deliverable sites should in addition include a buffer of 20% (moved forward from later in the plan period)."*

- 2.2 As the Wiltshire Core Strategy (adopted January 2015) is more than five years old, the housing requirement to be used in the five-year housing land supply calculation is Wiltshire's local housing need based on the Government's standard method<sup>2</sup>. The local housing need is based on the existing housing stock and an adjustment to take account of housing affordability in the local authority area. It is recalculated every year based on the latest data which is applicable at the base date, currently 1 April 2024. The standard methodology operates on a local authority basis and does not disperse the local housing need figure to a smaller geographic level.
- 2.3 The annual update for Wiltshire has now been completed and the results of the assessment, using a base date of 1 April 2024, are set out in the 2024 Housing Land Supply Statement (HLSS). This is available on our website via this [link](#). Key points:
  - The council cannot demonstrate the requisite five-year housing land supply. The current position indicates there is a **2.42 years** supply.
  - The deliverable supply has increased from the previous position (as set out in Briefing Note 24-20) due to a number of factors, including an increase in the number of permissions being granted, and solutions for nutrient mitigation on environmentally designated sites being established.

<sup>1</sup> Where the Housing Delivery Test results indicate delivery below 85%.

<sup>2</sup> Planning Practice Guidance (MHCLG, December 2024) - <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

### 3. How is the housing land supply calculated?

- 3.1 Housing land supply is calculated using a base date from which calculations are made to ensure a consistent position is established.
- 3.2 We have now updated the housing land supply calculation using a base date of 1 April 2024. Using this base date, an explanation is provided below:

Starting point for calculation at base date of 1 April 2024:

Local Housing Need (as at 1 April 2024) = **3,525 homes per annum**

Base 5-year requirement = **17,625 homes**

Add a 5% buffer to the base 5-year requirement = **18,506 homes**

What can be included in the supply ?

- (i) Number of homes on small sites (less than 10 homes) with planning permission or resolution to grant at 1 April 2024 = **1,415 homes** outstanding of which **955 homes** were considered to be deliverable within five years (the reduced number takes into account a delivery rate that is based on historic data on non-implementation and delivery timescales).
- (ii) Number of homes on large sites (10 or more homes) with full planning permission at 1 April 2024 = **4,853 homes** outstanding of which **4,289 homes** were considered deliverable within five years (the reduced number reflects delivery timescales and that some sites will not deliver in their entirety, or at all, in the five-year period).
- (iii) For other large sites with either outline planning permission, resolution to grant planning permission, or sites of any size which are allocated in the development plan<sup>3</sup> at 1 April 2024 = **9,745 homes** outstanding, of which **2,411 homes** were considered deliverable over the five year period from 1 April 2024 to 31 March 2029 (the reduced number reflects delivery timescales and that some sites will not deliver in their entirety, or at all, in the five-year period).
- (iv) Windfall allowance: number of homes expected to be completed on new 'windfall' sites (which do not have planning permission as at 1 April 2024) over a five-year period from 1 April 2024 to 31 March 2029 = **1,290 homes**

Therefore, in total **8,945 homes** can be included in the deliverable supply.

- 3.3 (i) and (ii) are relatively straightforward statistical exercises, which involve an understanding of delivery timescales for individual sites.

---

<sup>3</sup> Wiltshire Core Strategy, Chippenham Site Allocations Plan, Wiltshire Housing Site Allocations Plan, and allocations in Neighbourhood Plans which do not yet have planning permission.

- 3.4 (iv) is also a statistical exercise that requires understanding of past delivery trends and the potential for development opportunities to come forward in the future. As these are matters which vary year-on-year, the allowance is reviewed and refreshed as part of each annual update. The position includes an allowance for delivery on brownfield sites and small greenfield sites.
- 3.5 (iii) is more complex, and clear evidence must be provided for each site to meet the requirements of paragraph 78 of the NPPF, which requires that sites are deliverable over the five-year period being assessed. This means that for large sites, which take time to deliver, we may only be able to include the early phases of development in the five-year land supply.
- 3.6 So, while on the face of it there is a substantial pool of sites (for **17,303 homes** in total) and a higher level of supply could be expected, the timescales within which these can be delivered is a key consideration in setting out the five-year housing land supply. An assessment of the deliverability of these sites has indicated that only **52%** of these are capable of delivery during the five-year period 1 April 2024 to 31 March 2029. This is an increase from last year's assessment of deliverability, indicating that larger strategic sites are starting to come forward and contribute to the five-year supply. Factors determining housing delivery are often outside our control, as the development industry ultimately determines how and when sites come forward, despite planning permissions being granted and sites being allocated within the development plan.
- 3.7 It is important for credible judgements to be made in undertaking these assessments because they are subject to scrutiny at appeal by appellants, third parties and the appointed Planning Inspector.

#### **4. What are the implications of not having a five-year housing land supply?**

- 4.1 The implications for not having an adequate housing land supply for decision making were set out in previous briefing notes, most recently in [No. 24-18](#) (September 2024). These indicated that the presumption in favour of sustainable development applied when determining planning applications.
- 4.2 Following the December 2024 changes to the NPPF, the council is now required to demonstrate a five-year housing land supply (including the appropriate buffer as set out in paragraph 78 of the NPPF) to prevent the presumption in favour of sustainable development (or 'tilted balance') applying when determining planning applications. The implications of this are detailed in Briefing Note 24-20 (December 2024).

#### **5. What is the Housing Delivery Test (HDT) and consequences?**

- 5.1 It measures net homes delivery (i.e. net homes built) in a local authority area, such as Wiltshire, against the homes required over the preceding three years. It uses local authority completions statistics and planning data to carry out the calculation.
- 5.2 The results are published for each local authority area by the Secretary of State annually, see [Housing Delivery Test \(www.gov.uk\)](https://www.gov.uk/government/publications/housing-delivery-test)
- 5.3 As set out in the NPPF the Housing Delivery Test will apply the day following publication of the results, at which point they supersede previously published results. The most up to date

result, at the time of writing, is for 2023.

5.4 Since the inception of the Housing Delivery Test the published results for Wiltshire are:

2018	139% (years measured 2015/16 - 2017/18)
2019	149% (years measured 2016/17 - 2018/19)
2020	140% (years measured 2017/18 - 2019/20)
2021	141% (years measured 2018/19 - 2020/21)
2022	106% (years measured 2019/20 - 2021/22)
2023	135% (years measured 2020/21 – 2022/23)

5.5 The three consequences of failing the Housing Delivery Test (HDT) are set out in paragraph 79 of the NPPF, as follows:

1. Triggering the presumption in favour of sustainable development (HDT below 75%)

The presumption in favour of sustainable development (paragraph 11d, NPPF), as explained above, should be applied to decisions where the HDT indicates delivery has fallen below 75% of the housing requirement.

2. 20% buffer (HDT below 85%)

The five-year land supply must include an additional buffer of 20% where the HDT indicates that delivery was below 85% of the housing requirement.

3. Requirement to prepare an action plan (HDT below 95%):

The authority should prepare an action plan in line with national planning guidance, to assess the causes of under-delivery and identify actions to increase delivery in future years.

5.6 Wiltshire has consistently performed well against the HDT and has passed the test in the latest results. As a result, none of the consequences set out above apply in Wiltshire.

## 6. What can we do to improve the housing land supply?

6.1 The council will look to restore a five-year housing land supply through the Local Plan, which should be adopted prior to December 2025. In the interim, where applications are being considered for sites at settlements but outside the defined settlement boundaries there may be the opportunity to improve housing supply by favourably considering housing development proposals. The Wiltshire Local Plan review also looks to allocate additional housing land, some of which can be delivered within five years, and therefore will contribute towards meeting the five-year housing land supply in the future.

6.2 Since the base date of 1 April 2024, consents have continued to be granted permission on suitable sites. While these do not currently contribute to the housing land supply because they were permitted after the base date of 1 April 2024, they will help to increase the housing land supply in the future. New permissions help replenish the housing land supply as it is reduced due to housing completions, planning permissions lapsing, and delays in

delivery on key sites. Table 4 of the HLSS contains a list of large new sites (10 or more dwellings) that have been permitted since the base date up to the date of publication.

- 6.3 Work will now commence on the preparation of the next HLSS which will have a 1 April 2025 base date. These statements take time to prepare, particularly for authorities the size of Wiltshire, and typically take around 9 to 12 months from the base date to publication. It is anticipated that the next HLSS will take into account housing allocations in the Local Plan review.

# NOTICE OF REFERENDUM

## Referendum on the Joint Melksham Neighbourhood Plan 2

### for the parish area(s) listed below: **Melksham, Melksham Without**

A referendum will be held on the following question:

**Do you want Wiltshire Council to use the Neighbourhood Plan for Melksham to help it decide planning applications in the neighbourhood area?**

1. The poll will take place on **Thursday, 31st July 2025**.
2. Applications to register to vote must reach the Electoral Registration Officer by **12 midnight on Tuesday 15 July 2025**. Applications can be made online at [www.gov.uk/register-to-vote](http://www.gov.uk/register-to-vote).
3. Applications for postal and postal proxy votes must reach the Electoral Registration Officer at Electoral Services, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN by **5pm on Wednesday 16 July 2025**. Applications can be made online at [www.gov.uk/apply-postal-vote](http://www.gov.uk/apply-postal-vote).
4. Amendments or cancellations to existing postal, postal proxy and proxy votes must reach the Electoral Registration Officer by **5pm on Wednesday 16 July 2025**.
5. Applications for a Voter Authority Certificate or an Anonymous Elector's Document valid for this election must reach the Electoral Registration Officer by **5pm on Wednesday 23 July 2025**. Applications can be made online at [www.gov.uk/apply-for-photo-id-voter-authority-certificate](http://www.gov.uk/apply-for-photo-id-voter-authority-certificate).
6. Applications to vote by proxy must reach the Electoral Registration Officer by **5pm on Wednesday 23 July 2025**. Applications can be made online at [www.gov.uk/apply-proxy-vote](http://www.gov.uk/apply-proxy-vote).
7. A person can apply to vote by emergency proxy if they learn they cannot go to the polling station because of their occupation, service or employment, or a medical condition, illness or disability arises, after **5pm on Wednesday 23 July 2025**. Applications must reach the Electoral Registration Officer by **5pm on Thursday, 31 July 2025**.
8. Full details of upcoming polls including timetables, forms to register to vote and results can be found by scanning the code.

Dated Thursday 26 June 2025



Lucy Townsend  
Counting Officer



## Joint Melksham Neighbourhood Plan 2 Information Statement

A referendum relating to the Joint Melksham Neighbourhood Plan 2 will be held on 31<sup>st</sup> July 2025.

The question which will be asked in the referendum is '**Do you want Wiltshire Council to use the Neighbourhood Plan for Melksham to help it decide planning applications in the neighbourhood area?**'

The referendum area is identified on the map which is included with this information statement. The referendum area reflects the area that has been designated as the Melksham Neighbourhood Area.

A person is entitled to vote in the referendum if:-

- He or she is entitled to vote in an election of any Councillor of Wiltshire Council whose area is in the referendum area; and
- His or her qualifying address for the election is in the referendum area. A person's qualifying address is, in relation to a person registered in the register of electors, the address in respect of which he or she is entitled to be so registered.

The referendum expenses limit that will apply in relation to the referendum is £3,559.96. The number of persons entitled to vote in the referendum by reference to which that limit has been calculated is 19,966.

The referendum will be conducted in accordance with procedures which are similar to those used at local government elections.

A copy of the specified documents, that is those documents listed below, may be inspected during normal opening hours at:

- Melksham Community Campus, Market Place, Melksham SN12 6ES
  - Town Hall, Market Place, Melksham, Wiltshire, SN12 6ES
- Sprockets Coffee 116 Top Lane, Whitley, Melksham, SN12 8QU

The documents are also available for public viewing on Wiltshire Council's website at:  
<http://www.wiltshire.gov.uk/planning-neighbourhood-latest-news>

The specified documents are:-

- The referendum version of the Joint Melksham Neighbourhood Plan 2;
- Referendum Information Statement;
- The report of the independent examiner into the draft Neighbourhood Plan;
- Copies of the written representations submitted to the independent examiner;
- A Decision Statement of the Local Planning Authority's satisfaction that the draft Neighbourhood Development Plan meets the basic conditions specified by statute and complies with the provision made by or under Sections 38A and 38B of the Planning and Compulsory Purchase Act 2004;
- A statement that sets out general information as to town and country planning including neighbourhood planning and the referendum;
- Map of the Melksham referendum area.

Lucy Townsend  
Counting Officer  
Wiltshire Council  
County Hall  
Bythesea Road  
Trowbridge  
BA14 8JN

15<sup>th</sup> June 2025





# Joint Melksham Neighbourhood Plan 2

2020 – 2038

Referendum Version



## Land South of Western Way, Bowerhill

### Policy 7.3: Land South of Western Way Bowerhill

Land South of Western Way, Bowerhill, Melksham, as identified in figure 8, is allocated for development of:

- a. Up to 210 dwellings (class C3) including Affordable Housing, to meet identified local housing needs in conformity with JMNP2 Policy 6; and,
- b. a 70-bed residential care home (Class C2).

Any detailed application being submitted for the whole or part of the site must be in accordance with the approved parameters plans for development of the site.

Development of the site will:

#### Landscape, Green and Blue Infrastructure and Biodiversity

1. Be informed by arboriculture, landscape and ecology surveys and an approved management and construction management plan to secure the protection of existing and enhanced landscape features, priority species and ecology within and adjacent to the site.
2. Provide a scheme of site landscape, green and blue infrastructure and communal outdoor space that protects existing trees, contributes positively to resident health and wellbeing in accordance with JMNP2 Policies 12, 14, 17 and 18.
3. Deliver a minimum 10% net gain in on-site biodiversity.

#### Design

4. Include a site layout, built

form and scale that minimises visual impacts and safeguards the amenities of existing and new neighbouring residents, education and employment uses.

5. Provide a high standard of residential amenity and wellbeing by achieving design principles contained within recognised design guidance including "Buildings for a Healthy Life" (Homes England) and the Wiltshire Design Guide (2024).

6. Be of high quality design, appearance and materials in conformity with JMNP2 Policy 20 and demonstrating a positive response to the Melksham Design Guide and Codes (2023).

7. Address climate change through mitigation and adaptation and contribute to Wiltshire Council's carbon neutrality ambitions by including a significant use of low-carbon and renewable energy technologies, the re-use of the existing built fabric, and the application of the energy hierarchy.

*continued overleaf*

### Flood Risk

8. Be supported by a proportionate flood risk assessment and strategy.

9. Include sustainable drainage to manage the discharge of surface water to mitigate flood risk within the site and neighbouring land.

10. Integrate measures to protect and enhance watercourses surrounding the site through appropriate buffers to allow for access and maintenance.

### Access and Movement

11. Provide a new vehicular, pedestrian and cycle access from Maitland Place and an internal road network which will incorporate a bus loop.

12. Provide a secondary emergency highway access.

13. Create a pedestrian and cycle only access from Western Way and the Public Right of Way MELW42 to

the west of the site boundary and a pedestrian and cycle path network including a spine and orbital pedestrian route connecting with on-site green and blue infrastructure and neighbouring communities, schools and facilities;

14. Fund provision of a new signal controlled 'Toucan' crossing of Western Way.

15. Create a 2 metre wide footway connection along the southern side of Western Way adjacent to the site boundary.

16. Contribute towards provision of public transport and enhancement of facilities within less than 5 minutes easy walk of all residents and contributions to provide a viable service.

17. Implement resident and visitor parking and servicing in conformity with Wiltshire Council parking standards.

18. Provide ultra-low emission

vehicle (ULEV) charging infrastructure in line with JMNP2 Policy 4.

19. Provide resident and employee travel plans to encourage sustainable travel.

### Infrastructure

20. Make appropriate and relevant financial contributions to infrastructure, which may include proportionate contributions to:

- Early years education where appropriate.
- On or off-site healthcare capacity to meet the needs created by the development.
- Measures to positively support walking, wheeling and public transport use between the site, Melksham town centre and Melksham railway station and linking into existing networks.

### Land South of Western Way, Bowerhill

#### The reason for the policy

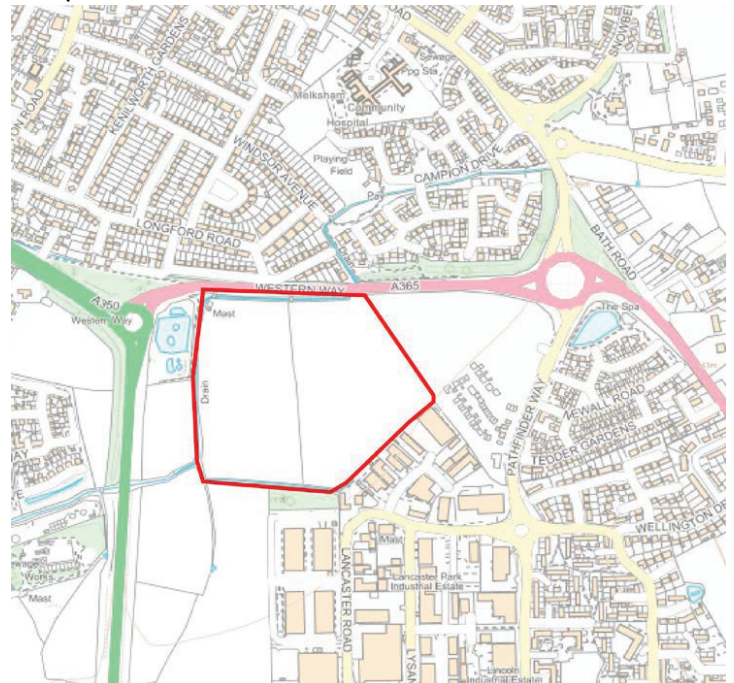
4.8.37 The 10.25 hectare greenfield site located to the south of Melksham, north-west of Bowerhill and east of Berryfield has been made available for allocation by JMNP2. In late 2023 outline planning permission granted on appeal established the principle for development of 210 dwellings and a 70 bed care home, with vehicle access from Maitland Place and broad landscape, layout and density parameters. Further “reserved matters” planning consents will be required to establish the precise layout, housing mix and design of the development.

4.8.38 The allocation addresses these new circumstances to ensure the development of the site is both best managed to protect the amenity of neighbouring residents and employers, and also secure optimum benefits for the community.

4.8.39 The proposed allocation of the site therefore seeks to:

- Regularise the consented housing development within JMNP2 to account for the 210 homes it enables;
- Plan positively to influence and set the layout, design and mix of future detailed housing proposals to meet local needs and expectations.

Figure 8: Land South of Western Way (approximate area/not to scale)



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2023, Contains OS data © Crown copyright and database right 2023

**Meeting with representatives of Barratt Homes regarding land South of Western Way held on Tuesday, 6<sup>th</sup> May 2025 at 11.30am at Melksham Without Parish Council Offices at Melksham Community Campus**

**Present:** Councillor Richard Wood (Chair of Planning)  
Councillor Alan Baines (Vice Chair of Planning)  
Councillor David Pafford (Vice Chair of Council)  
Councillor Mark Harris

Wiltshire Councillor Nick Holder, Bowerhill

Teresa Strange, Parish Clerk  
Fiona Dey, Parish Officer

Alex Winter, Design and Planning Manager – Barratt Homes  
Charlotte Counsell, Technical Co-ordinator - Barratt Homes  
Sean Hindes, Lead Designer, Pegasus Group

As Chair of Planning, Councillor Wood chaired the meeting and welcomed Alex, Charlotte and Sean to the meeting and introduced those present.

Charlotte provided the following summary of the meeting:

*Hi Teresa,*

*Thank you very much for your time meeting us regarding the proposed development south of Western Way. I have summarised the points raised below which will be considered as we develop our proposals.*

- *There are concerns regarding access to the site. It was suggested that the emergency access point to the northeast of the site could be used for construction access during construction of the development. It was suggested that the emergency access point to the northeast of the site could be used for construction access during construction of the development.*
- *'What counts as an emergency access point needs' to be confirmed specifically in relation to the need to access the care home.*
- *It was requested that there could be additional footpath linkages both east and west to provide connectivity across the site to the adjacent school etc. During the meeting it was explained that we are only able to carry out works within the boundary of our development, During the meeting it was explained that we are only able to carry out works within the boundary of our development.*



- *Location and layout of two attenuation ponds are to be detailed within RM applications.*
- *With regards to the MUGA (Multi-use games area), it was requested to include a 'Teen shelter' within this area. The intention of this is to draw older youth away from the LEAP area and other public open space. As the northern pond area is being reduced in size, the location of the MUGA could be proposed in an alternative location away from the care home and allotments.*
- *It was confirmed that the specification of street tree pits and the selection of tree species would be considered during the design process to ensure that long term health of trees can be promoted whilst safeguarding the adjacent properties from root damage and soil heave.*
- *The Affordable housing mix has been provided within the agreed S106, The Parish would like to see the inclusion of affordable bungalows. We can confirm that the S106 requires 2x Bungalows to be provided as part of the Affordable mix.*
- *The Parish expressed the desire for 'starter homes' (Smaller homes targeting first-time buyers). Barratt confirmed that, within the open market mix, they would be looking to provide a mix of 2 bed and smaller 3 bed homes to meet this need.*
- *The industrial estate to the south of the development will be considered as part of the reserved matters application, with the support of our specialist consultant.*
- *The Parish raised the point about historic Wessex comments regarding foul capacity. Parish to forward Wessex Water consultation response to local plan submission. Barratt to make contact with all utility providers regarding capacity.*
- *Parish raised concerns regarding the management of the POS during the period from completion to handover of the POS areas including play areas. Barratt confirmed that these areas will be maintained by our in-house adoption management team until such time that they can be handed over to the management company.*
- *The Parish requested that an area for a parish notice board was included within the proposals. The board would be installed by the Parish.*
- *The Parish provided a printed list of requirements they would like to see considered as part of developments in their area. Barratt will review and seek to include where possible.*

*We propose to come and present the developed design prior to RM submission and to demonstrate how we have incorporated your comments. If you could suggest a convenient date after the 9th June, we can get something in the diary.*

The following additional points were discussed at the meeting:

- Members expressed the need for a robust construction management plan.
- Members expressed a desire for additional footpath linkages both east and west to provide connectivity across the site to the adjacent school etc. While Barratt cannot carry out works outside the boundary of their development, they did offer to build a spur, at an appropriate break in the tree line, to link with the neighbouring development.
- The Barratt team commented that the Care Home will be developed separately by a specialist company still to be identified. It is expected that the Care Home will be completed within the overall timeframe for the residential build.
- The distance to the nearest shop/pub was noted to be significant. The Barratt team responded that, as shops/pubs were not included in the outline plan, they could not be added at this stage

Meeting closed at 13.15pm





## Land at Bath Road, Melksham



### COMMUNITY CONSULTATION

Hannick is seeking the views of local residents and will host a public exhibition at:

Melksham Town Football Club  
Oakfield Stadium  
Eastern Way  
Melksham  
SN12 7GU

Between **2.00pm - 7.00pm** on  
**16<sup>th</sup> June 2025.**

### PROPOSAL

Proposal for circa 200 homes with land reserved for expansion of Melksham Oak Community School.

### SITE

The site is located on the south east side of Melksham and extends to approximately 11.44 acres.

### PLANNING

The site is identified as a draft allocation in the emerging Wiltshire Local Plan.

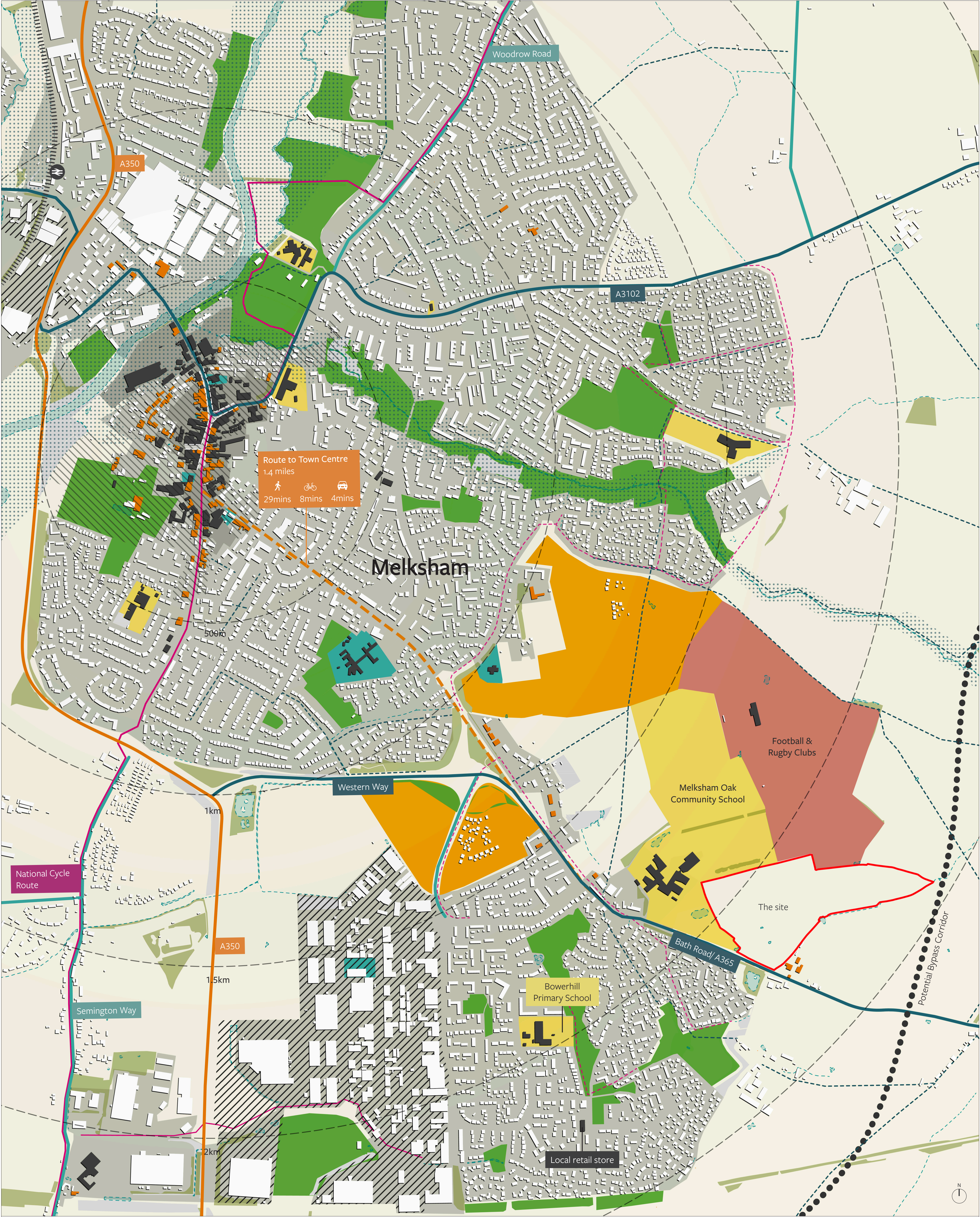
### COMMENTS

Please provide your comments via our website or in writing to the address below by **27<sup>th</sup> June 2025.**

www.bathroadmelksham.com







Site boundary

Settlement boundary

Town Centre

Town Centre frontage

Key local facilities

Conservation area

Flood zones 2 & 3

Listed buildings

Employment land

Education facilities

Health facilities

Recreational facilities

Railway line

Railway Station

Primary route

Other A road

B road

Public Rights of Way

National cycle route

Other existing cycle routes

Approved/Under Construction Housing

Sports Facilities

Land North of Bath Road, Melksham

Context Plan

210205 L 01 03

1:5000 @ A1

March 2021

CliftonEmerydesign

Hems House, 84 Longbrook Street, Exeter, Devon EX4 6AP

T: 01392 368866 W: www.cliftonemerydesign.co.uk M: mail@cliftonemerydesign.co.uk

Drawing Status

Preliminary

CONTRACTORS MUST CHECK ALL DIMENSIONS ON SITE. ONLY FIGURED DIMENSIONS ARE TO BE WORKED FROM. © THIS DRAWING IS COPYRIGHT.

AGENDA ITEM 14b ii - Bath Road 210205 L 01 03 A Context Plan A1

192





**DRAFT**



Schedule of Concept Masterplan Areas: (3003A)		
Gross site area (red line):		11.44ha
Gross residential development: (approx 203 homes @ average 37/hectare)		5.5ha
Area required for access:		0.15ha
School expansion:		2.00ha
POS (includes existing and proposed planting and SuDS)		3.79ha
SuDS (within POS)		0.82ha

- Site boundary
- Proposed all modes access
- Proposed pedestrian crossing area
- Residential development
- Focal buildings
- Land Reserved for Possible Future Melksham Oak School Expansion
- Roads
- Private drives/courtyards
- Local Equipped Area of Play (LEAP)

- Public Open Space (to include Sustainable Drainage Systems) (to be confirmed by engineer)
- Existing trees/hedges
- Root Protection Area
- Enhanced Root Protection Area
- Water mains (taken from Wessex Water mapping) to be retained and incorporating 5m no-build offset to each side of pipes
- Proposed new planting
- Proposed new buffer planting to existing hedges



client: <b>Hannick Developments Limited</b>	
project: <b>Land North of Bath Road, Melksham</b>	
drawing title: <b>Concept Masterplan</b>	
job number: <b>HAN102</b>	drawing number: <b>3003 rev B</b>
scale <b>1:2000 @ A3</b>	drawn <b>er/jvs</b>
date: <b>March 2025</b>	status: <b>Preliminary</b>

**urbandesignbox.co.uk**

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# Wiltshire Local Plan

Pre-Submission Draft 2020-2038 (Regulation 19)

**September 2023**

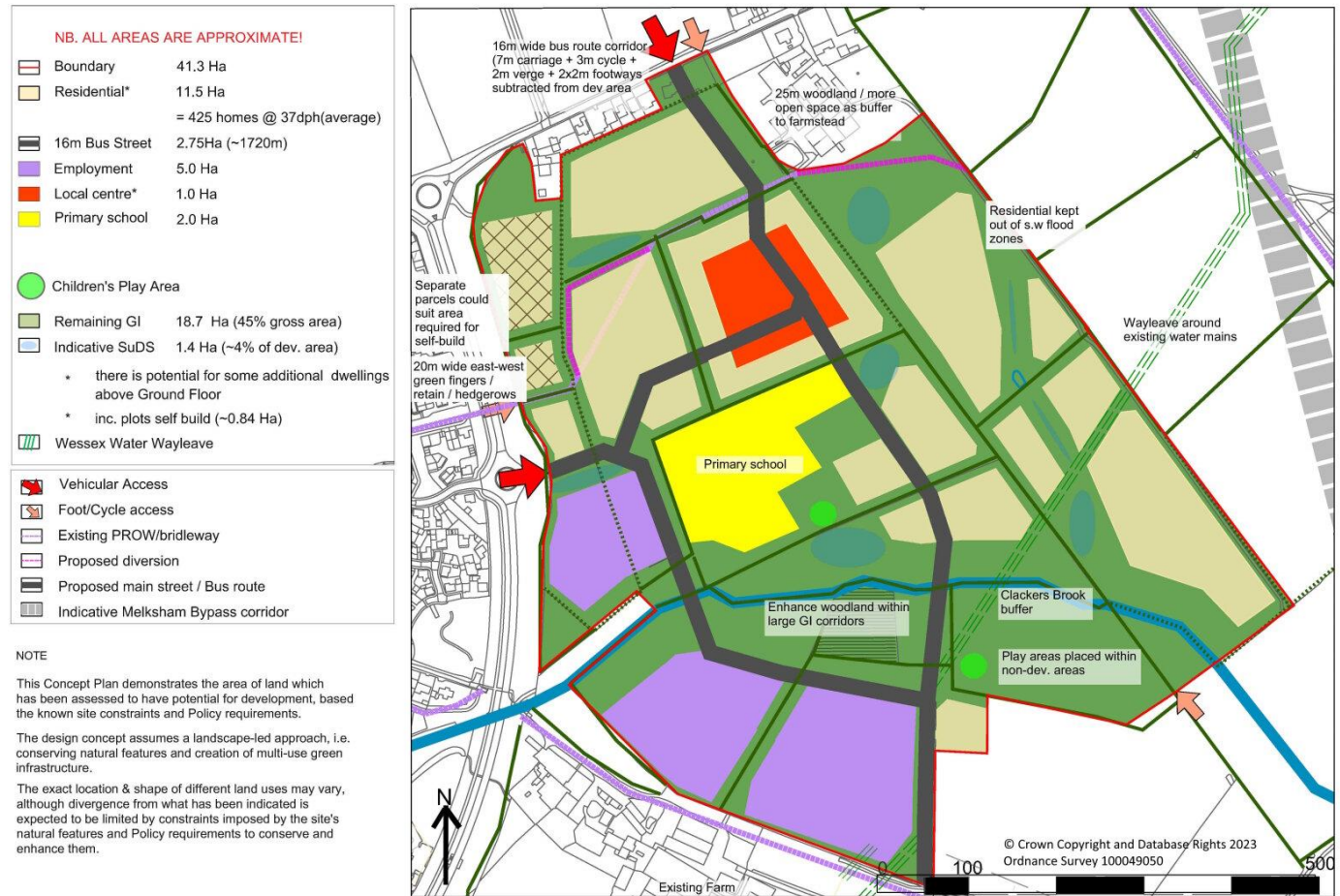
AGENDA ITEM 14b ii - Bath Road Policy Plan from Wiltshire Council Local Plan

**Wiltshire Council**

**Figure 4.12 Land East of Melksham Concept Plan**

Land East of Melksham

Concept Plan



## Land off Bath Road, Melksham

- 4.97** Approximately 11.3ha is allocated for the development of 135 dwellings, public open space and 2ha of land to enable Melksham Oak school to be expanded.
- 4.98** A tributary watercourse running through the site will require a significant buffer to create a green and blue corridor and assist biodiversity net gain. Protection, maintenance and enhancement should be provided for habitats such as hedgerows, trees and watercourses within and along the boundaries of the site alongside other ecologically valuable habitat/features.



## Policy 19

### Land off Bath Road, Melksham

Land off Bath Road, Melksham, as identified on the Policies Map, is allocated to provide approximately 135 dwellings and 2ha of land secured for the expansion of Melksham Oak Academy. Development will be brought forward in accordance with the principles in the concept plan.

Infrastructure and mitigation requirements include:

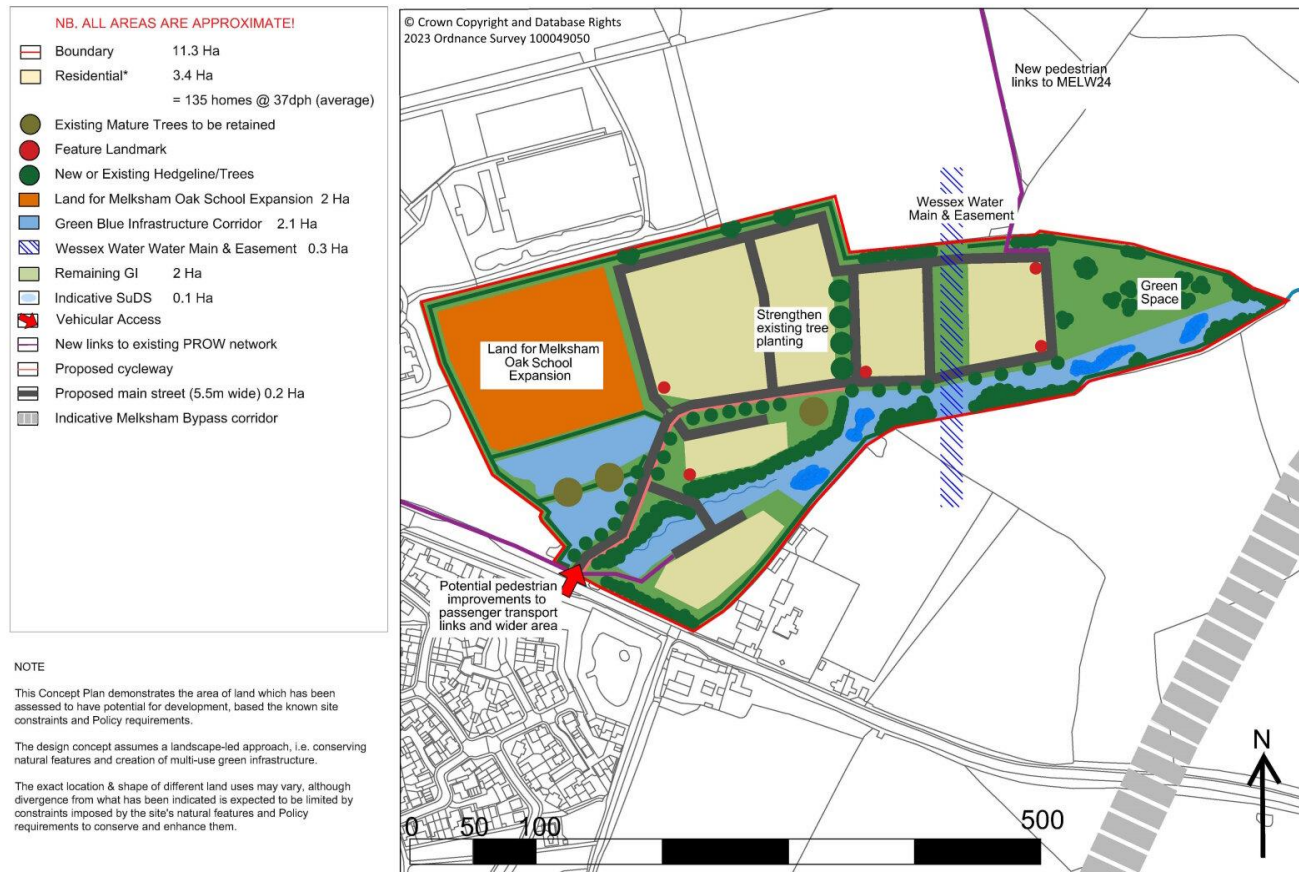
- vehicular access from the A365;
- Public Open Space within the development and as the main recreational area on the eastern part of site;
- measures to protect and enhance watercourses within the site;
- offsite infrastructure improvements to the water supply and foul water network;
- water infrastructure running through the site will need safeguarding through appropriate buffers to allow for access and maintenance;
- green and blue infrastructure through the development that incorporates new and existing woodland and protects and enhances existing hedgerows and trees;
- lower density development in the east of the site to prevent coalescence with and retain the rural character and separate identity of outlying rural settlements;
- design and layout that safeguards high value archaeological features;
- provision of pedestrian crossing facilities on the A365 if achievable;
- funding contributions towards early years, primary and secondary education and on, or off-site healthcare capacity to meet the needs created by the development; and
- measures to positively support walking, cycling and public transport use between the site, Melksham town centre and Melksham railway station and linking into existing networks; and
- implementation of ecological buffer zones alongside habitats to be retained and protected within the scheme layout, and wildlife sensitive lighting design in order to minimise adverse effects on light sensitive and intolerant wildlife, particularly bats: and
- appropriate mitigation and compensation for protected species, such as great crested newts; and
- contributions to be made towards a Melksham Transport Strategy.

**4.99** How the site may be developed is shown on the concept plan as shown in Figure 4.13. This illustrates one treatment of the site that considers mitigation requirements and the homes, other uses and infrastructure envisaged.

**Figure 4.13 Land off Bath Road, Melksham Concept Plan**

Land off Bath Road, Melksham

Concept Plan



## Land North of the A3102, Melksham

- 4.100** Land North of the A3102, Melksham is allocated for the development of 285 dwellings and land for a nursery. The site benefits from being reasonably well connected to the town centre, which is accessible by walking and cycling.
- 4.101** The site will deliver a sensitively designed residential led development set alongside a significant provision of greenspace, including a range of children's play areas and allotments.
- 4.102** Proposals for the site will need to demonstrate protection and enhancement of the nearby wooded greensand hills, and conservation and enhancement of habitats such as mature hedgerows, trees, water bodies/ponds and watercourses, including a tributary of the River Avon. The site is close to a working farm/industrial units and proposals must be accompanied by a noise impact assessment.

## Policy 20

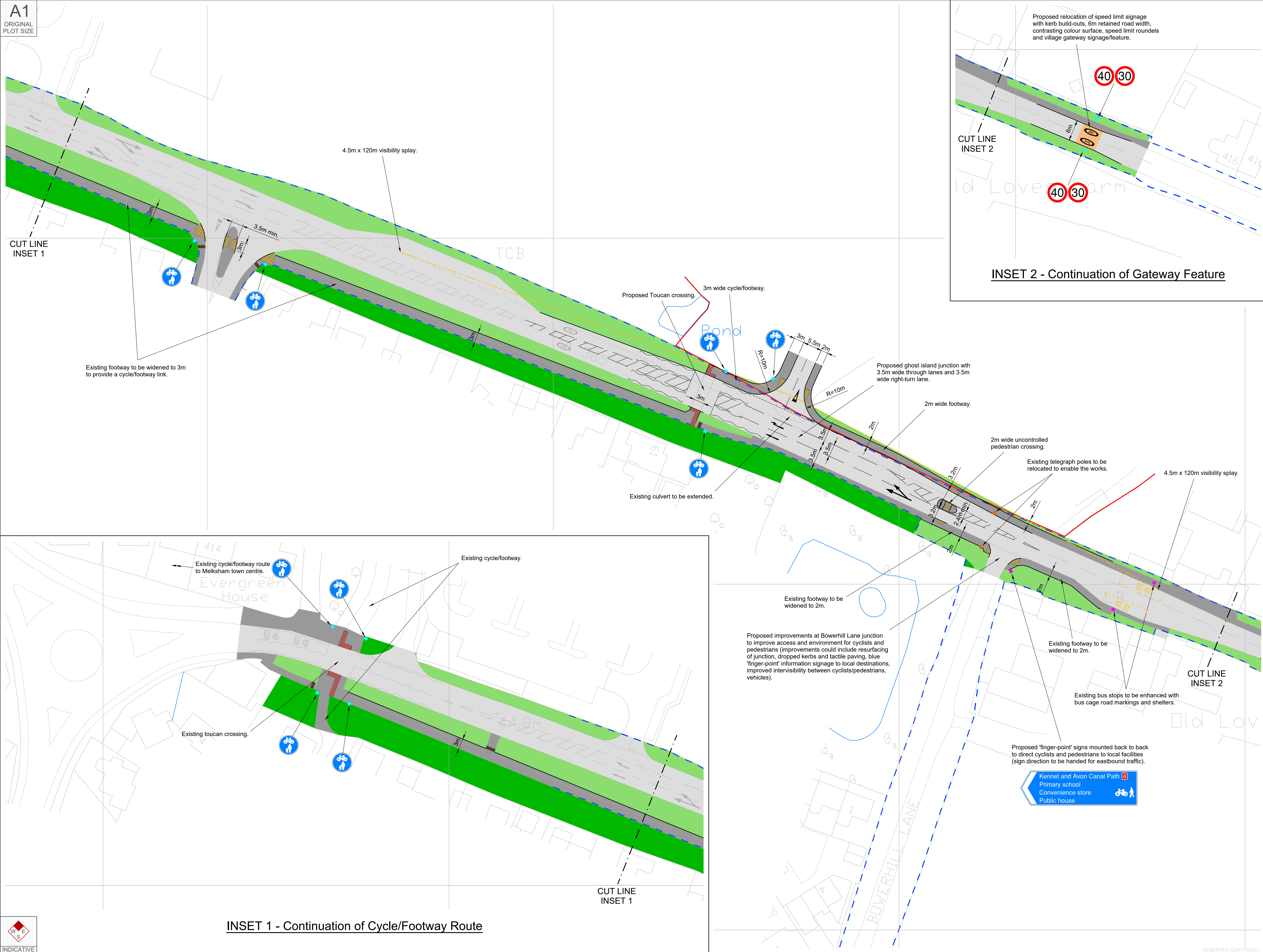
### Land North of the A3102, Melksham

Land North of the A3102, as identified on the Policies Map, is allocated for approximately 285 dwellings and 0.4ha of land for a 100-place nursery.

A single comprehensive masterplan, phasing and delivery strategy for the development, must be prepared and approved by the local planning authority in advance of any planning application being submitted for the whole or part of the allocated site. This must take account of the requirements



A1  
ORIGINAL  
PLOT SIZE



INSET 1 - Continuation of Cycle/Footway Route

INSET 2 - Continuation of Gateway Feature

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NOTES:

1. The extent of adopted highway has been taken from a 1:3,000 scale Ordnance Survey based adopted highway plan produced by Wiltshire Council dated 4th May 2020 and is indicative only.

KEY

- Approximate site boundary.
- Approximate extent of adopted highway maintainable at public expense by Wiltshire County Council.
- Carriageway.
- Footway, cycle/footway or traffic island.
- Tactile paving at uncontrolled crossing (colour buff).
- Tactile paving at controlled crossing (colour red).
- Corduroy hazard warning tactile paving at change in use.
- Grassed verge.
- Trees/planted area.
- Proposed sign post.
- Existing bus stop location.
- Existing telegraph pole to be relocated.

Rev	Date	Details	Drawn by	Checked by	Approved by
B	04.03.25	Updated to address RSA1 comments/recommendations.	PSW	AJS	JD
A	14.01.25	Proposals updated to address Wiltshire Council comments.	PSW	AJS	RR

**Bristol**  
Cambridge  
London  
Weylyn Garden City

**tpa**  
Transport Planning Associates

40 Berkeley Square  
Bristol  
BS8 1HP  
0117 925 9400  
[www.tpa.uk.com](http://www.tpa.uk.com)

CLIENT:  
HANNICK HOMES & DEVELOPMENTS LTD

PROJECT:  
LAND TO THE NORTH OF  
BATH ROAD, MELKSHAM

TITLE:  
Potential Site Access  
Arrangement and Pedestrian/  
Cycle Improvements

STATUS:  
**PRELIMINARY**

SCALE: 1:500	DATE: 09.02.22	DRAWN: PSW	CHECKED: RR	APPROVED: JD
JOB NO: 2109-008	DRAWING NO: SK02	REVISION: B		

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**Pre-App Meeting with representatives of Hannick Homes regarding land East of Melksham Oak School held on Tuesday, 6<sup>th</sup> May 2025 at 10.00am at Melksham Without Parish Council Offices at Melksham Community Campus**

**Present:** Councillor Richard Wood (Chair of Planning)  
Councillor Alan Baines (Vice Chair of Planning)  
Councillor David Pafford (Vice Chair of Council)  
Councillor Mark Harris

Wiltshire Councillor Nick Holder, Bowerhill

Teresa Strange, Parish Clerk  
Fiona Dey, Parish Officer

Glenn Godwin, Land & Planning Consultant, Hannick Developments Ltd  
Chris Minors, Operations Director, Hannick Developments Ltd.

As Chair of Planning, Councillor Wood chaired the meeting and welcomed Glenn and Chris to the meeting and introduced those present.

Glenn explained they are now in a position to progress with an outline planning application as the site is allocated in the emerging Local Plan. He commented that, in the application, they have taken note of the comments from the previous pre-application (pre-app) with Melksham Without Parish Council in 2021.

He explained that Hannick is planning a public consultation within the next 4 weeks and are planning to hold this at Melksham Town Football Club or Melksham Rugby Football Club as they are close to the site location. Other members of the Hannick team will be present at the consultation, including from the highways team to help answer any specific questions.

Glenn explained that Hannick having been undertaking a number of assessments in consultation with David Way and Geoff Wilmslow at Wiltshire Council and have reached a Statement of Common Ground in line with the Local Plan allocation. Glenn expects an outline planning application to be made within the next 6 weeks.

Glenn stated that ecology surveys have been completed and have identified that most protected species are found at the site borders and in the hedgerows. The site plans will protect the existing hedgerows with the exception of a punch-through for one road. The trees on the site have been surveyed and there are some veteran trees which will form focal points in the design. Archaeology will need to be investigated but there are no constraints.

Glenn presented the context plan (document: 210205 I 01 03 A Context Plan A1.pdf) showing the location of the site. The plan also includes the route of the potential Melksham by-pass.

Glenn then presented the Wiltshire Council Local Plan Pre-Submission (document: WLPR Concept Plan.pdf). He explained that this shows the 2.0ha set aside for Melksham Oak Community School (MOCS) expansion and a Wessex Water easement across the site which can't be developed and will be left as open space. Blue and green infrastructures are shown.

Glenn then presented the concept masterplan (document: Concept Masterplan 3003 Rev B.pdf) which he commented is similar to the plan from Wiltshire Council.

He commented that the Flood Risk Assessment (FRA) indicates that the southern edge of the development could be prone to surface water flooding. However, the risk of flooding has been reduced by 70% by more accurate modelling, slight remodelling of the landscape and by increasing the depth of the watercourses.

Glenn explained that the plan is currently for about 200 dwellings. This is less than the previously planned 240 dwellings due to the set aside of land for the school expansion. The 2ha set aside was decided following conversations with the MOCS and with the Local Education Authority. It was thought to be the maximum amount of space needed to accommodate an additional 300 pupils. Glenn commented that it was expected that any school expansion would take place within the existing site, but the set aside plan would accommodate displaced open space, such as sports pitches or car parking.

Nick Holder commented that there are currently 300 vacancies at MOCS so there is no immediate need to create additional school places.

Glenn agreed with Nick, that there are no definite plans from MOCS or Wiltshire Council to expand the school. He also emphasised that the 2ha was the maximum predicted space needed.

A question was asked about what happened to the land if the expansion didn't take place. Chris responded that a s106 might define that it would be retained for education use for 10 years and possibly then revert to the developers.

Glenn went on to present the site access plan (document: SK02-Reev B Site Access Arrangement and Cycle Improvements.pdf). He commented that the access had been designed to be optimum for visibility. A Toucan crossing had been included on the A365 at the site entrance to provide a link to the footpath and cycleway on the south side of the road. This had been developed with Chris Mead, Highways Officer, at Wiltshire Council (noted that Chris has now left the council).

## CONCERNS RAISED BY MEMBERS

### Access to MOCS

It was noted that children from the development would need to cross the A365 twice to access MOCS, as there is no space for a footpath on the north side of the road.

**The councillors felt strongly that this was not satisfactory and that an entrance to the school directly from the development would be needed.** Nick Holder commented that this would need to happen.

Glenn commented that it had been assumed that the school would not want an additional access point but there was scope within the residential area to add one. He agreed to discuss options with MOCS executive Head David Cooper and White Horse Federation.

### Access to Primary Schools

It was noted that the closest primary school to the development was Bowerhill, as the planned primary school at Pathfinder Way has not been progressed and other primary schools are more distant. It was felt that the development is isolated from Bowerhill and the rest of Melksham which may deter children from walking to school.

### A365 Speed Limit and Turning Right from the Development

Several existing risk points for turning on or off the A365 were identified: right turn out of MOCS, right turn into Bowerhill lane, right turn into Hornchurch Road. It was noted that turning right from the development onto the A365 combined with the proximity of the Toucan crossing would also be difficult. It was noted that, as proposed, relocation of the change of speed limit from 30mph to 40mph (travelling away from Melksham) would be better further east along the A365. It was also noted that the potential Gompels development would also impact the road speeds.

**Therefore, it was suggested that a s106 should include a comprehensive speed limit review.**

### Proposed number of Dwellings, density and appearance

Councillors questioned why the proposal for about 200 dwellings was higher than the 135 allocated in the NHP and why the development was encroaching into the space indicated in the Local Plan allocation to be open space. Glenn explained that the increase is based on detailed plans and evaluations, and even with 200 dwellings they are in excess of the open space ratio requirements because of SUDS and surface water drainage areas. The overall housing density is 37 dph which Glenn



commented was similar to other developments. There will be a total of 5.5ha of residential development and the design includes focal points of 2.5/3 storey buildings.

Councillors questioned the mews/terrace in the southern corner of the site and whether this would be affordable housing. Glenn explained that this would be a farmyard type arrangement as there was only one way in and out. He also confirmed that 40% of dwellings would be Affordable Housing in line with the Local Plan but that the location of the Affordable Housing has not yet been considered. The clerk confirmed that the council would want to see affordable housing dispersed across the development.

Glenn also confirmed that there would be no gas on site, every dwelling would have an Electric Vehicle charging point, and that there would be heat pumps and solar panels.

The Parish Clerk explained the Parish Council had a list of things they requested from developers, such as circular walks, provision of bins and play equipment, with the Parish Council taking on responsibility for any LEAPs installed. The Parish Officer agreed to forward the list of requests.

Glenn and Chris thanked the Parish Council for their time and agreed to send details of the planned public consultation.

Meeting closed at 11.15am



9<sup>th</sup> June 2025

For the attention of the owner / occupier

Dear Sir or Madam

**Re: Proposed residential development on land to the south of Old Loves Farm, Bowerhill**

We are writing to let you know that The Silverwood Partnership is preparing an outline planning application for residential development of up to 50 new homes on land south of Old Loves Farm. The site location is outlined in red in Figure 1 below:



*Figure 1. the redline shows the extent of the prospective planning application site.*

Our draft proposals have been informed by a pre-application enquiry with the Council, and technical surveys across a range of technical disciplines.

The proposed outline application proposal will make provision for: a mix of open market and affordable homes; drainage works including the creation of wetland features; and a new single vehicular access direct from the Bath Road (A365) with associated provision of a new footway. The proposal will meet mandatory targets for biodiversity net gain and will protect, enhance and manage the existing perimeter hedgerows as well as making provision for new tree planting and a pedestrian cycle link to Bowerhill Lane.

Before the proposals are finalised for a planning application submission, which is scheduled for later in 2025, we are contacting local residents adjacent to the site to offer an individual briefing



ASHWORTH HOUSE, WESTONBIRT, GLOUCESTERSHIRE GL8 8QJ

[land@silverwood.uk.com](mailto:land@silverwood.uk.com)

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meeting in order that we can explain the draft proposals in more detail and answer any questions. This could be in-person or via a Teams or Zoom meeting.

When the application has been finalised, submitted and registered, Wiltshire Council will conduct their own statutory consultation. They will erect a site notice and contact immediate neighbours. You will then have an opportunity to submit comments directly to the planning case officer as part of the formal planning application process.

If you wish to arrange a meeting, please could you contact me using the email contact details above prior to the end of June 2025.

Yours faithfully


Kevin Bird  
**The Silverwood Partnership**

# Joint Melksham Neighbourhood Plan Site Options And Assessment 2023

Melksham Town Council and Melksham Without Parish  
Council (the 'Qualifying Body')

5<sup>th</sup> June 2023

## 3345

1. Site Details	
<b>Site Reference / Name</b>	3345
<b>Site Address / Location</b>	Old Loves Farm, Bowerhill Lane, Melksham, SN12 6RB
<b>Gross Site Area</b> (Hectares)	1.98
<b>SHLAA/SHELAA Reference</b> (if applicable)	3345
<b>Existing land use</b>	Agriculture
<b>Land use being considered</b>	Residential
<b>Development Capacity</b> (Proposed by Landowner or SHLAA/HELAA)	75 dwellings (Wiltshire SHELAA); No indicative capacity proposed by the promoter
<b>Site identification method / source</b>	Wiltshire SHELAA
<b>Planning history</b>	No recent or relevant planning applications.
<b>Neighbouring uses</b>	Residential to the west, agricultural to the north and south with some residential to the immediate south.
<b>Site Boundary</b>	

2. Assessment of Suitability	
Environmental Constraints	
<p><b>Site is predominantly, or wholly, within or adjacent to the following statutory environmental designations:</b></p> <p>Yes / No / partly or adjacent</p> <ul style="list-style-type: none"> <li>• Ancient Woodland</li> <li>• Area of Outstanding Natural Beauty (AONB)</li> <li>• Biosphere Reserve</li> <li>• Local Nature Reserve (LNR)</li> <li>• National Nature Reserve (NNR)</li> <li>• National Park</li> <li>• Ramsar Site</li> <li>• Site of Special Scientific Interest (SSSI)*</li> <li>• Special Area of Conservation (SAC)</li> <li>• Special Protection Area (SPA)</li> </ul> <p><i>*Does the site fall within a SSSI Impact Risk Zone and would the proposed use/development trigger the requirement to consult Natural England?</i></p>	<p>No. The site is within a SSSI Impact Risk Zone however the proposed use does not trigger the requirement to consult Natural England.</p>
<p><b>Site is predominantly, or wholly, within or adjacent to the following non statutory environmental designations:</b></p> <p>Yes / No / partly or adjacent / Unknown</p> <ul style="list-style-type: none"> <li>• Green Infrastructure Corridor</li> <li>• Local Wildlife Site (LWS)</li> <li>• Public Open Space</li> <li>• Site of Importance for Nature Conservation (SINC)</li> <li>• Nature Improvement Area</li> <li>• Regionally Important Geological Site</li> <li>• Other</li> </ul>	<p>No impact identified on non-statutory environmental designations.</p>
<p><b>Site falls within a habitats site which may require nutrient neutrality, or is likely to fall within its catchment?</b></p> <p>Yes / No</p>	<p>No. There are no identified habitats in unfavourable condition due to excessive nutrients in Melksham. The Neighbourhood Area falls outside of the Nutrient Alert Areas in Wiltshire which includes the River Test catchment, the Hampshire River Avon catchment and the River Lambourn and Somerset Levels and Moors.</p>
<p><b>Site is predominantly, or wholly, within Flood Zones 2 or 3?</b></p> <p>See guidance notes:</p> <ul style="list-style-type: none"> <li>• Flood Zone 1: Low Risk</li> <li>• Flood Zone 2: Medium Risk</li> <li>• Flood Zone 3 (less or more vulnerable site use): Medium Risk</li> <li>• Flood Zone 3 (highly vulnerable site use): High Risk</li> </ul>	<p>Low Risk. The site is wholly within Flood Zone 1.</p>
<p><b>Site is at risk of surface water flooding?</b></p> <p>See guidance notes:</p> <ul style="list-style-type: none"> <li>• Less than 15% of the site is affected by medium or high risk of surface water flooding – Low Risk</li> <li>• &gt;15% of the site is affected by medium or high risk of surface water flooding – Medium Risk</li> </ul>	<p>Low Risk - Less than 15% of the site is affected by medium or high risk of surface water flooding.</p>
<p><b>Is the land classified as the best and most versatile agricultural land (Grades 1, 2 or 3a)?</b></p> <p>Yes / No / Unknown</p>	<p>The site is Grade 3 Good to Moderate Quality Agricultural Land. More detailed site surveys would be required to assess whether the site is Grade 3a Good Quality Agricultural Land.</p>



## 2. Assessment of Suitability

<p><b>Site contains habitats with the potential to support priority species? Does the site contain local wildlife-rich habitats? Is the site part of:</b></p> <ul style="list-style-type: none"> <li>• UK BAP Priority Habitat;</li> <li>• a wider ecological network (including the hierarchy of international, national and locally designated sites of importance for biodiversity);</li> <li>• wildlife corridors (and stepping stones that connect them); and/or</li> <li>• an area identified by national and local partnerships for habitat management, enhancement, restoration or creation?</li> </ul> <p><i>Yes / No / Unknown</i></p>	<p>The site does not contain national or locally identified wildlife-rich habitats, but is adjacent to multiple identified priority habitats (deciduous woodland).</p>
<p><b>Site is predominantly, or wholly, within or adjacent to an Air Quality Management Area (AQMA)?</b></p> <p><i>Yes / No / Unknown</i></p>	<p>No</p>
<h3>Physical Constraints</h3>	
<p><b>Is the site:</b></p> <p><i>Flat or relatively flat / Gently sloping or uneven / Steeply sloping</i></p>	<p>Flat or relatively flat.</p>
<p><b>Is there existing vehicle access to the site, or potential to create suitable access?</b></p> <p><i>Yes / No / Unknown</i></p>	<p>Vehicular access could potentially be provided to the site via Bowerhill Lane. However, comments from the Highways Authority on adjacent sites note that Bowerhill Lane is a single width lane with no official passing places or pedestrian facilities and have not been considered of a suitable standard to accommodate additional traffic generated by the small-scale development or further dwellings off of Bowerhill Lane.</p>
<p><b>Is there existing pedestrian access to the site, or potential to create suitable access?</b></p> <p><i>Yes / No / Unknown</i></p>	<p>No, the site is not served by pedestrian access and is not connected to a continuous footpath network to the existing settlement.</p>
<p><b>Is there existing cycle access to the site, or potential to create suitable access?</b></p> <p><i>Yes / No / Unknown</i></p>	<p>Yes, cycle access could potentially be created to the site via Bowerhill Lane which may require upgrade, subject to consultation with relevant local highways authority.</p>
<p><b>Are there any Public Rights of Way (PRoW) crossing the site?</b></p> <p><i>Yes / No / Unknown</i></p>	<p>No, there are no PRoW crossing the site.</p>
<p><b>Are there any known Tree Preservation Orders on the site?</b></p> <p><i>Yes / No / Unknown</i></p>	<p>No</p>
<p><b>Are there veteran/ancient trees within or adjacent to the site?</b></p> <p><i>Within / Adjacent / No / Unknown</i></p>	<p>Unknown</p>
<p><b>Are there other significant trees within or adjacent to the site?</b></p> <p><i>Within / Adjacent / No / Unknown</i></p>	<p>Yes, within. The site is bordered to the east by semi-mature trees. Further arboricultural assessment would be required to understand their significance.</p>
<p><b>Is the site likely to be affected by ground contamination?</b></p>	<p>Unknown, further assessments would be required however the site is unlikely to be contaminated land due to its existing use.</p>

## 2. Assessment of Suitability

Yes / No / Unknown

**Is there any utilities infrastructure crossing the site i.e. power lines/pipe lines, or is the site in close proximity to hazardous installations?**

Yes / No / Unknown

No known utilities infrastructure crossing the site or hazardous installations in close proximity.

**Would development of the site result in a loss of social, amenity or community value?**

Yes / No / Unknown

No

### Accessibility

Distances to community facilities and services should be measured using walking routes from the centre of each site to each facility. The distances are based on the assumption that 400m is equal to approximately 5 minutes' walk .

Facilities	Town / local centre / shop	Bus / Tram Stop	Railway station	Primary School	Secondary School	Open Space / recreation facilities	Cycle Route
Distance (metres)	>1200m	<400m	>1200m	>1200m	<1600m	<400m	>800m

### Landscape and Visual Constraints

**Is the site low, medium or high sensitivity in terms of landscape?**

- **Low sensitivity:** the site has few or no valued features, and/or valued features that are less susceptible to development and can accommodate change.
- **Medium sensitivity:** the site has many valued features, and/or valued features that are susceptible to development but could potentially accommodate some change with appropriate mitigation.
- **High sensitivity:** the site has highly valued features, and/or valued features that are highly susceptible to development. The site can accommodate minimal change.

Medium sensitivity.

The site falls within the Semington Open Clay Vale Landscape Character Area of the Melksham Neighbourhood Plan Local Landscape Character Report 2020 and the West Wiltshire Landscape Character Assessment (December 2006). This area is characterised by a strong sense of openness throughout the area, with characteristically extensive views across the vales. The management strategy of this Character Area is to enhance the landscape setting of Melksham and Bowerhill, particularly its visually intrusive harsh urban edges.

The site contains limited landscape features at present and has a simple landform. Therefore it has few or no valued features that are less susceptible to development and can accommodate change. However, the site supports the transition of the settlement edge of Melksham to the open countryside. Development of the site extending beyond the defined edge at Bowerhill Lane may be contrary to the management strategy for this Character Area.

## 2. Assessment of Suitability

### Is the site low, medium or high sensitivity in terms of visual amenity?

- *Low sensitivity: the site is visually enclosed and has low intervisibility with the surrounding landscape, and/or it would not adversely impact any identified views.*
- *Medium sensitivity: the site is somewhat enclosed and has some intervisibility with the surrounding landscape, and/or it may adversely impact any identified views.*
- *High sensitivity: the site is visually open and has high intervisibility with the surrounding landscape, and/or it would adversely impact any recognised views.*

Medium sensitivity.

The site is largely enclosed and has low intervisibility with the surrounding landscape, development on the site may impact on views of the open clay vale landscape and views from the Public Right of Way to the southeast.

### Heritage Constraints

#### Would the development of the site cause harm to a designated heritage asset or its setting?

*Directly impact and/or mitigation not possible /  
Some impact, and/or mitigation possible /  
Limited or no impact or no requirement for mitigation*

Some impact subject to further heritage assessment. The site is located to the rear of the Grade II listed Old Love Farmhouse and may have a positive contribution to its agricultural setting. Further heritage assessment would be required.

#### Would the development of the site cause harm to a non-designated heritage asset or its setting?

*Directly impact and/or mitigation not possible /  
Some impact, and/or mitigation possible /  
Limited or no impact or no requirement for mitigation*

No identified non-designated heritage within or adjacent to the site.

### Planning Policy Constraints

#### Is the site in the Green Belt?

*Yes / No / Unknown*

No

#### Is the site allocated for a particular use (e.g. housing / employment) or designated as open space in the adopted and / or emerging Local Plan?

*Yes / No / Unknown*

No

#### Are there any other relevant planning policies relating to the site?

#### Is the site:

*Greenfield / A mix of greenfield and previously developed land / Previously developed land*

Greenfield

#### Is the site within, adjacent to or outside the existing built up area?

*Within / Adjacent to and connected to /  
Outside and not connected to*

Adjacent to and connected to the existing built-up area.

#### Is the site within, adjacent to or outside the existing settlement boundary (if one exists)?

*Within / Adjacent to and connected to /  
Outside and not connected to*

Adjacent to and connected to the existing settlement boundary.

#### Would development of the site result in neighbouring settlements merging into one another?

*Yes / No / Unknown*

No. Development on the site would not result in neighbouring settlements merging into one another.

## 2. Assessment of Suitability

**Is the size of the site large enough to significantly change the size and character of the existing settlement?**

Yes / No / Unknown

Yes. The site strongly relates to the rural character of the area. Development of the site would contribute to an urbanising effect on the area.

## 3. Assessment of Availability

**Is the site available for development?**

Yes / No / Unknown

Yes. The site is confirmed to be available as part of the landowner engagement conducted by Melksham Town Council and Melksham Without Parish Council as of October 2022.

**Are there any known legal or ownership problems such as unresolved multiple ownerships, ransom strips, tenancies, or operational requirements of landowners?**

Yes / No / Unknown

Part of the identified boundary of 3345 is now in separate land ownership and has been considered as Site 3758.

**Is there a known time frame for availability?**

Available now / 0-5 years / 6-10 years / 11-15 years

Available now

## 4. Assessment of Viability

**Is the site subject to any abnormal costs that could affect viability, such as demolition, land remediation or relocating utilities? What evidence is available to support this judgement?**

Yes / No / Unknown

Unknown

## 5. Conclusions

_What is the expected development capacity of the site? (either as proposed by site promoter or estimated through SHLAA/HELAA or Neighbourhood Plan Site Assessment)	N/A
_What is the likely timeframe for development _ (0-5 / 6-10 / 11-15 / 15+ years)	0-5 years
_Other key information	
_Overall rating (Red/Amber/Green) _The site is <b>suitable and available</b> _The site is <b>potentially suitable, and available.</b> _The site is <b>not currently suitable, and available.</b>  Are there any known viability issues? Yes / No	<b>Red</b>        <b>No</b>
_Summary of justification for rating	<p>The site is not suitable for allocation for residential development in isolation.</p> <p>The site is greenfield southeast of Bowerhill, adjacent to its settlement boundary. It is served by existing bus stops and is within a reasonable distance from local education services. The site could be potentially accessed via Bowerhill Lane, however, comments from the Highways Authority on planning applications on adjacent sites note that Bowerhill Lane may be unsuitable to support further development. The site may be potentially suitable if developed in conjunction with Site 3331. The creation of acceptable vehicular access may require the removal of the existing mature hedgerows surrounding the site. Further consultation with the relevant Highways Authority would be required.</p> <p>The site contributes to the rural transition of Bowerhill to the open countryside and has some intervisibility with the surrounding landscape and Public Rights of Way. Development of the site would lead to an urbanising effect which would need to be mitigated. It may be appropriate to develop the site alongside Site 3331 as a comprehensive extension to Bowerhill, however, this may adversely impact the settlement pattern and settlement edge of Bowerhill.</p> <p>The site is located to the rear of the Grade II listed building, Old Love Farmhouse. It may contribute to the agricultural setting of the designated heritage assets. Further heritage assessment would be required.</p>



<b>The Joint Melksham Neighbourhood Plan 2 requires the following provided:</b>	<b>The Parish Council would like to see the following provided</b>
Adherence to adopted Melksham Neighbourhood Plan 1 policies and emerging Neighbourhood Plan 2 and evidence documents.	Circular pedestrian routes around the site.
Contribution towards improved bus services, which serve the area.	<p>The Parish Council seek the provision of play equipment above that required by the West Wiltshire District Council saved Policy in the Core Strategy and wish to enter into discussions being the nominated party for any proposed LEAPs (Local Equipped Area of Play)/Play area and seek the following:</p> <ul style="list-style-type: none"> <li>• A maintenance sum in the s106 agreement</li> <li>• Safety Surfacing extended beyond the play area fence line (by at least 30 cm) and for the whole area to be surfaced as such, with no joins to prevent future expansion gaps, and no grass that will require maintenance</li> <li>• Tarmac paths provided not hoggins.</li> <li>• No wooden equipment provided.</li> <li>• Dark Green Metal bow top fencing provided.</li> <li>• Clean margins around the edges, no planting.</li> <li>• Bins provided outside the play area.</li> <li>• Easy access provided for maintenance vehicles.</li> <li>• Public access gates painted red.</li> <li>• No inset symbols provided in the safety surfacing, which should be one solid surface.</li> </ul>
Contribution to educational and medical facilities within the Melksham area.	Equipment installed for teenagers such as a teen shelter/MUGA and somewhere to kick a ball around
The provision of bird, bat and bee bricks, reptile refugia and hibernacula within the development, in order to increase biodiversity.	The provision of benches and bins where there are circular pedestrian routes and public open space and the regular emptying of bins to be reflected in any future maintenance contribution.
Improvements to Rights of Way.	Contribution towards playing fields.

Provision of allotments with access to parking and water supply in line with National Allotment Society guidance.	Connectivity with existing housing development so not isolated.
Heat pumps and provision of solar panels and storage batteries for every house or group of houses/block of flats to be included in proposals. To include capacity for hydrogen heating in the future within proposals.	There are practical art contributions Parish Council are involved in public art discussions
	Any bus shelters provided should include seats rather than perches, as well as sides and are suitable in providing Real Time Information (RTI) ie access to an electricity supply, WiFi connectivity and are an appropriate height.
	Speed limit within the site is 20mph and self-enforcing.
	Proposed trees are not planted on boundaries of new/existing housing, but further into public open spaces.
	The development is tenant blind.
	If adjacent to existing dwellings the design is such that the layout is garden to existing garden.
	The road layout is such that there are no dead ends in order that residents and refuse lorries do not need to reverse out of roads.
	There is visible delineation between pavement and roads so they are easily identifiable
	Provision of convenience store with free access cash point.
	Inclusion of lifebuoys, noticeboards, and defibrillators. The maintenance of these items to be undertaken by the management company, unless the council decides that they would like to take on the asset.