

Strategic Environmental Assessment (SEA) for the Joint Melksham Neighbourhood Plan

Environmental Report to accompany the Regulation 14
version of the Neighbourhood Plan

Joint Melksham Neighbourhood Plan Steering Group

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Quality information

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Non-Technical Summary

What is Strategic Environmental Assessment?

A Strategic Environmental Assessment (SEA) has been undertaken to inform the Joint Melksham Neighbourhood Plan (hereafter referred to as “the JMNP2”). This process is required by the SEA Regulations.

Neighbourhood Plan groups use SEA to assess Neighbourhood Plans against a set of sustainability objectives developed in consultation with interested parties. The purpose of the assessment is to help avoid adverse environmental and socio-economic effects through the Neighbourhood Plan and identify opportunities to improve the environmental quality of the area covered by the Neighbourhood Plan and the quality of life of residents.

What is the JMNP2?

The JMNP2 has been prepared as a Neighbourhood Development Plan under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012.

Purpose of this Environmental Report

This Environmental Report, which accompanies the Regulation 14 version of the JMNP2 is the latest document to be produced as part of the SEA process. The first document was the SEA Scoping Report (December 2022), which included information about the neighbourhood area’s environment and community.

The purpose of this Environmental Report is to:

- Identify, describe, and evaluate the likely significant effects of the JMNP2 and alternatives.
- Provide an opportunity for consultees to offer views on any aspect of the SEA process which has been carried out to date.

The Environmental Report contains:

- An outline of the contents and main objectives of the JMNP2 and its relationship with other relevant policies, plans and programmes.
- Relevant aspects of the current and future state of the environment and key sustainability issues for the area.
- The SEA Framework of objectives against which the JMNP2 has been assessed.
- The appraisal of alternative approaches for the JMNP2.
- The likely significant effects of the JMNP2.
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects as a result of the JMNP2.
- The next steps for the JMNP2 and accompanying SEA process.

Consideration of reasonable alternatives for the JMNP2

Housing numbers to deliver within the neighbourhood area

The JMNP2 is being prepared in the context of the Wiltshire Core Strategy Development Plan Document (DPD), which was adopted in 2015. Wiltshire Council are also in the process of undertaking a review of the Local Plan¹. Regulation 18 consultation on the emerging spatial strategy was completed between January and March 2021, with the outcomes of this consultation informing the preparation of the draft Local Plan. Regulation 19 consultation on the draft Local Plan² commenced in July 2023.

With respect to housing numbers, the emerging Local Plan provides a target of 1,170 homes for the wider Melksham area during the plan period (to 2038), along with 73 homes in the villages of Shaw and Whitley³. The housing requirements are to be delivered through the following mechanisms:

- Existing commitments and completions (i.e., sites which have permission already, and are either currently under construction or are likely to commence in due course).
- Strategic scale site allocations to come forward through the emerging Local Plan (i.e., likely large greenfield sites which will be subject to detail assessment); and
- A proportion of homes to be found through neighbourhood plan allocations.

Additional to the 1,170 homes for the wider Melksham area, Wiltshire Council suggests that a further 200 homes should be delivered in Melksham through site allocations identified within JMNP2. Subtracting the 23 homes which are committed or have already been delivered within Shaw and Whitley, a residual housing number of 50 homes is identified for these villages. Therefore, the JMNP2 will identify sites to deliver a total of 250 homes during the plan period.

Appraisal of options for the focus of development in Melksham

In recognition of the availability of brownfield site options within the neighbourhood area and considering that there are also several greenfield site options surrounding the town, the SEA has considered the relative sustainability merits of taking forward a greenfield first or a brownfield first approach to development in Melksham.

To support the choice of a development strategy for the JMNP2, the SEA process has assessed the following options as reasonable alternatives:

- **Option A:** Meeting housing needs through brownfield site allocations.
- **Option B:** Meeting housing needs through greenfield site allocations.

Table 4.1 to Table 4.8 within the main body of the Environmental Report present the findings of the appraisal of the options for each of the SEA themes. A summary of the findings is presented below in **Table NTS1** and supporting text.

¹ Wiltshire Council (2021): 'Local Plan Review Consultation', can be accessed [here](#)

² Wiltshire Council (2023): 'Wiltshire Local Plan Pre-Submission Draft 2020-2038 (Regulation 19)', accessible [here](#)

³ Wiltshire Council (2023): 'Wiltshire Local Plan – factsheet for Large Villages and Local Service Centres' accessible [here](#)

Table NTS1: Rankings of sustainability performance against each SEA theme

SEA theme	Rank of preference	
	Option A	Option B
Air Quality	1	2
Biodiversity and Geodiversity	1	2
Climate Change and Flood Risk	1	2
Community Wellbeing	1	2
Historic Environment	1	2
Land, Soil, and Water Resources	1	2
Landscape	1	2
Transportation	1	2

Overall, Option A performs more favourably than Option B, and is ranked the most favourable option with respect to each SEA theme. A summary of the appraisal findings is discussed in more detail below.

In terms of air quality, greenfield development through Option B is more likely to lead to the loss of trees and hedgerows (natural absorbers of pollutants) which may exacerbate air quality issues. Meanwhile, brownfield development through Option A will deliver growth closer to services and facilities and public transport hubs in the town centre, reducing the likelihood of residents driving to meet their needs, with positive implications for air quality. In addition to this, Option A could deliver green infrastructure enhancements at brownfield sites (with associated air quality benefits). Nevertheless, it is also recognised that Option A has potential to contribute to air quality issues and congestion in the town centre if residents chose to drive.

Regarding biodiversity, greenfield development through Option B has potential to lead to the loss of key landscape features of biodiversity value over a large area and has the potential to disrupt existing ecological corridors. However, it is noted that proposals through Option B would still be required to deliver biodiversity net gains and has potential to deliver more coordinated green infrastructure enhancements through the design of schemes, linking with existing green and blue corridors within the neighbourhood area. Comparatively, Option A has potential to improve biodiversity at brownfield sites with little to no existing biodiversity value, which will likely be delivered due to the requirement to deliver biodiversity net gain. In addition to this, key areas of biodiversity value are largely located outside of the town centre, and in this respect, development at brownfield sites is less likely to have adverse impacts on internationally and nationally designated sites for biodiversity. Therefore, Option A is ranked more favourably than Option B.

In terms of climate change mitigation, Option B has potential to deliver more coordinated infrastructure, due to the larger size of available greenfield sites, including decentralised energy and active travel infrastructure, contributing to a reduction in operational emissions. However, Option B is also likely to lead to a higher dependency on the private car to access services and facilities and employment opportunities in the town centre as most of the greenfield sites are located outside of the town. Meanwhile, brownfield development through Option A has potential to reduce the emissions associated with infrastructure delivery by encouraging development within the most accessible locations in the neighbourhood.

area, in proximity to local public transport networks. In addition to this, Option A provides opportunities to enhance the resilience of the existing built-up area of Melksham to the effects of climate change through the delivery of green infrastructure as part of scheme design (i.e., integrating sustainable drainage to tackle surface water run-off issues). Option A is also likely to lead a higher uptake of active travel and public transport as it is located close to existing footpaths, cycleways, and public transport nodes. Due to this, Option A is ranked more favourably than Option B.

Regarding landscape, greenfield development through Option B has potential to negatively impact landscape character by reducing the amount of open countryside surrounding the town, which contributes to the setting and feel of the town. Issues are likely to be more pronounced given the in-combination and cumulative effects resulting from the strategic greenfield site allocations which are proposed through the emerging Local Plan. Comparatively, Option A will safeguard the open countryside surrounding the town, maintaining important views, protecting green gaps and wedges between settlements, and helping to safeguard areas of high landscape sensitivity. Also, Option A, through encouraging development on potentially underutilised areas of brownfield land, has the potential to positively contribute to townscape character and enhance the quality of the public realm. However, this is dependent on the design of the schemes which come forward. Nonetheless, Option A performs more favourably with respect to this SEA theme.

With respect to the historic environment, greenfield development through Option B is more likely to locate development away from Melksham Conservation Area and listed buildings and performs well in this respect. However, it is noted that large-scale greenfield development will also impact views into/ out of the town, with potential to negatively impact the setting and significance of the conservation area and listed buildings. Contrastingly, brownfield development through Option A has a greater potential to impact the setting of the conservation area and listed buildings within the existing built-up area of Melksham. Nevertheless, brownfield development also provides opportunities to enhance the local townscape character, including the setting of heritage assets, through high-quality redevelopment of sites that may currently be detracting from the significance and special qualities of nearby heritage assets. However, this is dependent on the design of schemes. On balance, Option A is the preferable option.

In terms of land, soil and water resources, greenfield development through Option B will lead to the permanent loss of greenfield land, including BMV agricultural land, which cannot be mitigated. Conversely, brownfield development through Option A supports the efficient use of land through the reuse of existing structures, whilst rejuvenating previously developed land. Option A also has potential to lead to medium to long-term improvements to water quality and surface water drainage. In light of the above, Option A is the preferable option. However, it is noted that brownfield development is more likely to involve ground contamination and associated remediation works, which may reduce the viability of bringing forward development at these locations.

In terms of community wellbeing, development on greenfield land surrounding the town is likely to support the delivery of relatively large schemes which could offer a wide range of housing types and tenures, including affordable homes. It is recognised that larger greenfield sites also have the potential to generate significant contributions for community infrastructure enhancements, which is more readily

achievable through Option B. Furthermore, greenfield development at the settlement edge provides easier access to the surrounding countryside, with positive impacts on the health and wellbeing of residents. A focus on brownfield development through Option A will support the delivery of housing in areas accessible to existing services and facilities and employment opportunities, positively supporting community vitality. Moreover, brownfield development has potential to enhance the quality of the public realm and improve the satisfaction of residents with their neighbourhood as a place to live. The significance of the opportunities associated with larger greenfield sites (Option B) is less relevant in the context of this neighbourhood plan, as 1) greenfield sites are coming forward through the emerging Local Plan as strategic site allocations for a significant number of homes, and 2) a key focus of the neighbourhood plan is to regenerate and rejuvenate the town centre environment. In this respect, Option A is the most preferable option.

Finally, in terms of transportation, Option A is ranked more favourably than Option B as it would facilitate development in the existing built-up area of Melksham, close to existing active travel and public transport networks. Whilst the potential for Option B to deliver new infrastructure, including footpaths, cycleways, and connections to the existing bus network, is recognised, this is more readily achievable through Option A.

Appraisal of options for the focus of development in Shaw and Whitley

The available site options within and surrounding the villages of Shaw and Whitley are shown below in **Figure NTS1**.

Nine of the sites have been given a 'red' rating through the Site Options and Assessment (SOA) process⁴, due to the environmental sensitivity of the land surrounding Shaw and Whitley. This primarily links to the heritage and landscape sensitivity issues at these locations, which includes a number of historic environment features and proposed green wedges / buffers⁵. A total of four sites have been given an 'amber' rating.

In light of this, the SEA has considered the sites in further detail with respect to the potential constraints and opportunities associated with taking them forward as allocations within the JMNP2. Site summaries are presented below.

⁴ The SOA report accompanies the JMNP2 at Regulation 14 consultation. Reflecting upon the constraints and opportunities of the available site options, sites have been given a red, amber, or green rating in terms of their suitability for a neighbourhood plan allocation. A 'red' rating indicates that the site is unsuitable, an 'amber' rating indicates that the site is potentially suitable (with some minor constraints), and a 'green' rating indicates that the site is suitable to take forward.

⁵ The JMNP2 evidence base accompanies the Neighbourhood Plan at Regulation 14 consultation, including the heritage assessment report and the green wedge / buffer report, and is accessible [here](#)

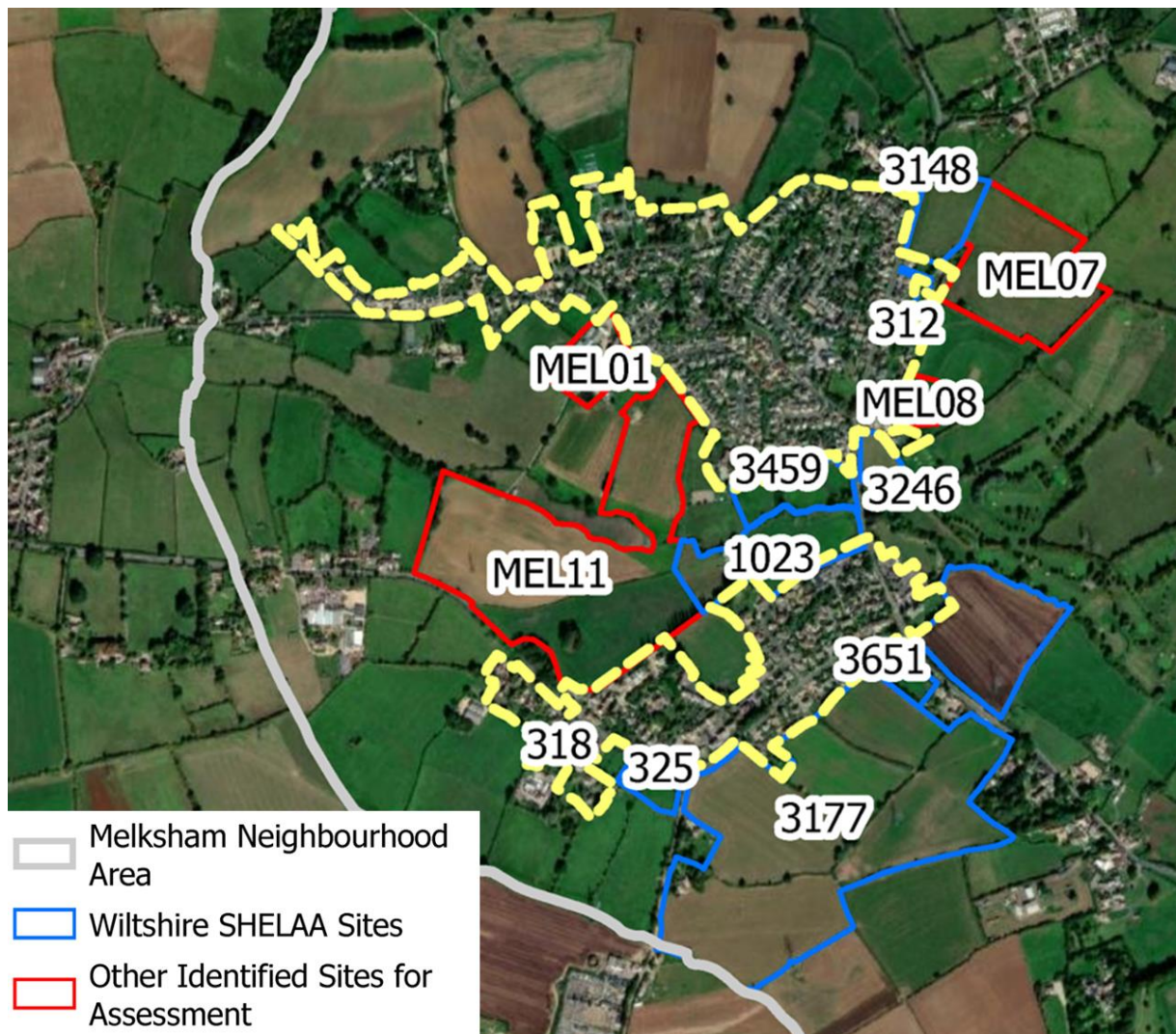


Figure NTS1: Available site options within and surrounding Shaw and Whitley

- **Site 312 'Corsham Road'**: Potentially suitable for up to four homes. Availability not confirmed. The Grade II listed C18 cottage within the site boundary is a key constraint to development at this location.
- **Site 318 '28 and 29 Shaw Hill'**: The site is confirmed to be unavailable for development.
- **Site 325 'South of Shaw House'**: Potentially suitable for up to four homes. Availability not confirmed. The site makes a positive contribution to the transition of Shaw to the open countryside and has some intervisibility with the surrounding landscape, including long distance views to Broughton Gifford. This is a key constraint to development at this location.
- **Site 1023 'Land adjacent to the Vicarage'**: Indicative capacity for up to 103 homes. The site is located along a green infrastructure corridor, with approximately 20% of the site located in Flood Zone 3. From a landscape sensitivity perspective, the site currently plays a critical role in providing a rural setting and separation between Shaw and Whitley. On this basis, the SOA concludes that the site is unsuitable for a Neighbourhood Plan allocation.

- **Site 3148 'Middle Farm, Corsham Road':** The site is allocated for residential development in the 'made' JMNP1 for approximately 18 homes (see Policy 7). A planning application is currently being prepared by a developer.
- **Site 3177 'Land at Shaw':** Indicative capacity for up to 662 homes. Over 50% of the site area to the east of Bath Road is within Flood Zone 3. From a landscape sensitivity perspective, this area encompasses the villages of Shaw and Whitley and has a level and gently undulating landscape with a predominantly rural character. The site also plays a critical role in the transition of Shaw into the open countryside, and in creating a landscape buffer between Shaw and Melksham. Development of the site would represent a significant advancement into the open countryside. On this basis, the SOA concludes that the site is unsuitable for a Neighbourhood Plan allocation.
- **Site 3246 'Land off Corsham Road':** Indicative capacity of between 15 and 24 homes. A previous application for a self-build three-bedroomed home on the site (ref: 16/11951/FUL) was refused, with the decision notice confirming that the proposed development would constitute as unwarranted encroachment of residential development on to agricultural land. The SOA concludes that the site is potentially suitable for a Neighbourhood Plan allocation, however development of the site would increase the risk of coalescence of Shaw and Whitley with some impacts on the local landscape character. Further heritage assessment work would be required to understand the development impacts on the setting of a number of listed buildings in close proximity to the site.
- **Site 3459 'Land adjacent to Lagard House':** Indicative capacity of up to 184 homes. A previous application for four homes (ref: PL/2021/06922) was refused, with the decision notice confirming that the proposed development located in the open countryside would detract from the rural character of the area, would result in urbanisation of the rural landscape, and would allow development to encroach upon the northern boundary of Shaw resulting in increasing coalescence between Shaw and Whitley. With respect to the high landscape sensitivity of the site, the SOA concludes that the site is unsuitable for a Neighbourhood Plan allocation.
- **Site 3651 'Land adjacent to Church Farm House, Bath Rd':** Indicative capacity for up to nine homes. The site is adjacent to the Grade II listed Church Farm and approximately 50 metres south of the Grade II* Christ Church. Wiltshire Council's Heritage Officer has noted that the impact of proposed development on the settings of these listed buildings is of key importance. Alongside the landscape sensitivity of this location, the SOA concludes that the site is unsuitable for a Neighbourhood Plan allocation.
- **Site MEL01 'Whitley Farm, Middle Lane':** Indicative capacity of up to 21 homes. Three existing buildings or structures on the site are Grade II listed, including Barn at Whitley Farm, Whitley Farmhouse, and the Mounting Block to Right of Farm Entrance of Whitley Farm. However, the current setting of the designated heritage structures is harmed by the modern agricultural buildings and storage units on site. Development of the site has the potential to be sympathetic to surrounding residential areas and capitalise on the underutilised nature of the site. From a landscape perspective, whilst the site has some intervisibility with the surrounding landscape, as the site mostly consists of existing agricultural outbuildings and built structures, the change introduced by the redevelopment of the site could be potentially mitigated through sensitive

design in relation to character, scale of development and the introduction of landscape buffer along the boundaries. Viability is a potential constraint to development at this location. Specifically, development of the site would require substantial removal of existing agricultural outbuildings and a water tank, as well as conversion of existing listed buildings. This is likely to impact the development cost of the site.

- **Site MEL07 ‘Land to the rear of Site 3148’:** The site is adjacent to a site which has been allocated for 18 homes within the ‘made’ JMNP1 (see Policy 7). The site contains limited landscape features at present and has a simple landform, however it makes a positive contribution to the rural and tranquil landscape character of this part of Whitley and plays a key role in supporting the transition of Whitley to the open countryside. The site is located in close proximity to several Grade II listed buildings along Corsham Road. Further heritage assessment would be required to understand the potential impacts and identify appropriate mitigation. Other key constraints identified include potential impacts on green infrastructure corridors, loss of Grade 3 Agricultural Land, and proximity to an electricity substation.
- **Site MEL08 ‘Land to the rear of Site 3246’:** The site plays a critical role in the rural transition of Whitley to the open countryside. It currently acts as a buffer between existing dwellings east of Corsham Road, including two Grade II listed buildings, and Whitley Cricket Ground. Development of the site would extend the settlement pattern beyond the established soft edge formed by a continuous line of boundary hedgerows. The SOA concludes that the site is unsuitable for a Neighbourhood Plan allocation.
- **Site MEL11:** An allocation at this location would conflict with the proposed green wedge / buffer and views of the village and open countryside as observed from the west / south west.

Developing the preferred approach

The preferred approach has been informed by the various surveys and evidence base documents prepared to support the JMNP2 (to date), responses from community consultation events, and the SOA and SEA findings.

The JMNP2 encourages developers and site promoters to work collaboratively with the community to ensure that schemes:

- Appropriately addresses any constraints to development.
- Deliver key community aspirations through the design of new development areas (e.g., the provision of new community assets and infrastructure); and
- Positively contribute towards the wider visions and objectives for the neighbourhood area.

The site-specific policies for the proposed site allocations (see **Policies 7.1 to 7.5** within the draft JMNP2) contain further detail with respect to design and mitigation considerations which aim to address any potential constraints to development. These aspects are further discussed within the plan appraisal section of the Environmental Report (presented in **Chapter 5** in the main body of the report).

Melksham

To deliver the housing target of 200 homes for Melksham, the JMNP2 supports a brownfield-first approach to development (**Option A**) to be met via two site allocations. Specifically:

- Up to 150 dwellings as part of mixed development on the former Cooper Tires site; and
- Up to 50 dwellings of affordable, age restricted dwellings on the former Library site.

In terms of the selection of brownfield site allocations to include within the JMNP2, consideration has been given to the following factors:

- Whether the site is currently safeguarded for its employment uses or providing a key community benefit or service.
- Whether the site is considered to be partial / smaller site which forms part of a larger brownfield area within the town which could potentially benefit from a comprehensive approach to regeneration (e.g., via comprehensive and detailed scheme design); and
- The potential of the site to contribute to the wider vision for the town as identified within the Melksham Town Centre Masterplan, which sets out spatial guidance for the town to aid in its protection, conservation, enhancement, regeneration, and sustained vitality.

In the wider context, there are several larger greenfield site options surrounding the town which are currently being considered by Wiltshire Council as potential strategic-scale allocations within the emerging Local Plan. It is expected that the strategic-scale allocations will deliver the 1,170 new homes for the wider Melksham area, positively contributing towards local needs alongside the delivery of new community assets and infrastructure.

Shaw and Whitley

To deliver the residual housing target of 50 homes for Shaw and Whitley, the JMNP2 allocates the following sites:

- 40 dwellings on Middle Farm (Site MEL07); and
- Up to ten dwellings on the Whitley Farm site (Site MEL01).

With respect to the 'amber' sites identified within the SOA findings, Site 312, Site 318, and Site 3246 are relatively small sites (potentially accommodating up to 32 homes in total) which reduces their potential to deliver affordable housing and housing of a range of types and tenures to meet local requirements. Additionally, the combined total number of homes (based on their indicative capacities) would not meet the residual housing target of 50 homes for Shaw and Whitley as identified within the emerging Local Plan. In light of this, the Neighbourhood Group have reconsidered the available sites within and surrounding Shaw and Whitley which were given a 'red' rating within the SOA, as none of the sites have been given a 'green' rating.

Most of the 'red' sites within and surrounding Shaw and Whitley have significant landscape sensitivity constraints to development, which is taken forward would result

in a reduction of the proposed green wedges / buffers between the two villages (e.g., Site 3177 and Site 3651) and Melksham (e.g., Site 1023 and Site 3459). In this respect, the rationale for taking forward Site MEL07 is primarily linked to the following factors: 1) its location adjacent to Middle Farm which is currently allocated within the 'made' JMNP1, and 2) the relative size of the site and potential community benefits of the site (i.e., its potential to accommodate a range of housing types and tenures, alongside affordable housing requirements).

With respect to the potential constraints to development at this location, the Neighbourhood Group confirms the following:

“The site provides substantial capacity for a landscape buffer and open space to mitigate visual impacts on village setting and provide new accessible public open space (adjacent to the cricket ground and golf course). The visual impacts on open countryside are largely restricted to those from the north, with the large substation blocking views from the east.”

Regarding Site MEL01, it is recognised that there are potential viability concerns associated with bringing forward residential development at this location. Specifically, the need to demolish existing agricultural buildings on site, remove the water tank, and the potential heritage sensitivities associated with the listed buildings on site. The Neighbourhood Group confirms the following:

“We have had a heritage impact assessment undertaken (as part of the 'made' JMNP1) for this site which has identified limited developable area (as allocated in JMNP2). We are having site viability technical support to inform this site and expect Regulation 14 feedback to inform a final allocation capacity.”

Appraisal of the Regulation 14 version of the JMNP2

The Regulation 14 version of the JMNP2 presents 25 planning policies for guiding development in the neighbourhood area. These were developed following extensive community consultation and evidence gathering.

Chapter 5 within the main body of the Environmental Report presents the findings of the appraisal of the Regulation 14 version of the JMNP2. Utilising the SEA Framework of objectives and assessment questions developed during the earlier scoping stage of the SEA, the Environmental Report presents the findings of the assessment as a commentary of effects under the following themes:

- Air Quality.
- Biodiversity and Geodiversity.
- Climate Change and Flood Risk.
- Community Wellbeing.
- Historic Environment.
- Land, Soil, and Water Resources.
- Landscape; and
- Transportation and Movement.

In the context of the above, the assessment has concluded that the Regulation 14 version of the Neighbourhood Plan is likely to have **long-term positive effects in**

relation to the 'Community Wellbeing' SEA theme. This primarily links to the Neighbourhood Plan's support for high-quality development proposals which would deliver suitable and appropriate housing for the local community (via a range of types, tenures, and affordability), safeguard and improve the availability of services, facilities and amenities, and support opportunities for town centre regeneration. These policy provisions will support social inclusion, and community and economic vitality. The Neighbourhood Plan is also likely to facilitate improvements to the public realm (including through green infrastructure enhancements) and encourage healthy outdoor recreation and relaxation. These policy provisions will support the quality of life of residents. Furthermore, the inclusion of key design principles within the Melksham Design Guidelines and Codes document will provide an extra level of detail and certainty, helping to ensure local knowledge and aspirations are taken into consideration during development design.

The Neighbourhood Plan will also deliver **long-term positive effects in relation to the 'Landscape' and 'Historic Environment' SEA themes.** These benefits largely relate to the Neighbourhood Plan's emphasis on protecting and enhancing the relationship between natural and built environment, protecting important landscape and heritage features, and facilitating improvements to the quality of the public realm. While the proposed site allocations are sensitive from a landscape and heritage perspective, it is considered that the neighbourhood plan policies provide a detailed overview of the proposed mitigation and enhancement measures which proactively and positively address the sensitivities.

Additionally, **the Neighbourhood Plan will bring minor long-term positive effects in relation to the 'Biodiversity and Geodiversity' SEA theme** by encouraging proposals to protect existing and establish new habitats, enhance ecological networks (including through green infrastructure enhancements), and deliver net gains.

Uncertain effects are considered likely in respect to climate change and flood risk. The Neighbourhood Plan has the potential to lead to positive effects through supporting proposals that promote the inclusion of low carbon technologies and the use of local and traditional building materials, encourage sustainable and active travel, and proactively respond to the potential impacts of climate change through the implementation of appropriate drainage solutions. However, it is recognised that new development would lead to inevitable increases in greenhouse gas emissions due to an increase in the built footprint of the neighbourhood area.

The plan also makes provision for transportation and air quality; encouraging proposals which would deliver new and enhanced public rights of way and improvements to the local transport network. This will allow for safe and active transportation around the neighbourhood area and better access to locations further afield. As such, **minor long term positive effects are anticipated for transportation and air quality** through the implementation of the JMNP2.

It is expected the Neighbourhood Plan will bring forward **minor long term positive effects for land, soil, and water resources** in the neighbourhood area by incorporating several provisions will help support the capacity of the landscape to regulate soil and water quality. The allocations within Melksham support a brownfield-first approach to development, encouraging the most efficient use of previously developed land. Whilst the proposed site allocations at Shaw and Whitley are areas of greenfield land, it is important to recognise that the total number of homes to be delivered through the sites (totalling 50 homes) is perhaps less

significant in the context of the 1,170 homes which are being brought forward in the wider Melksham Area through strategic greenfield allocations in the emerging Local Plan.

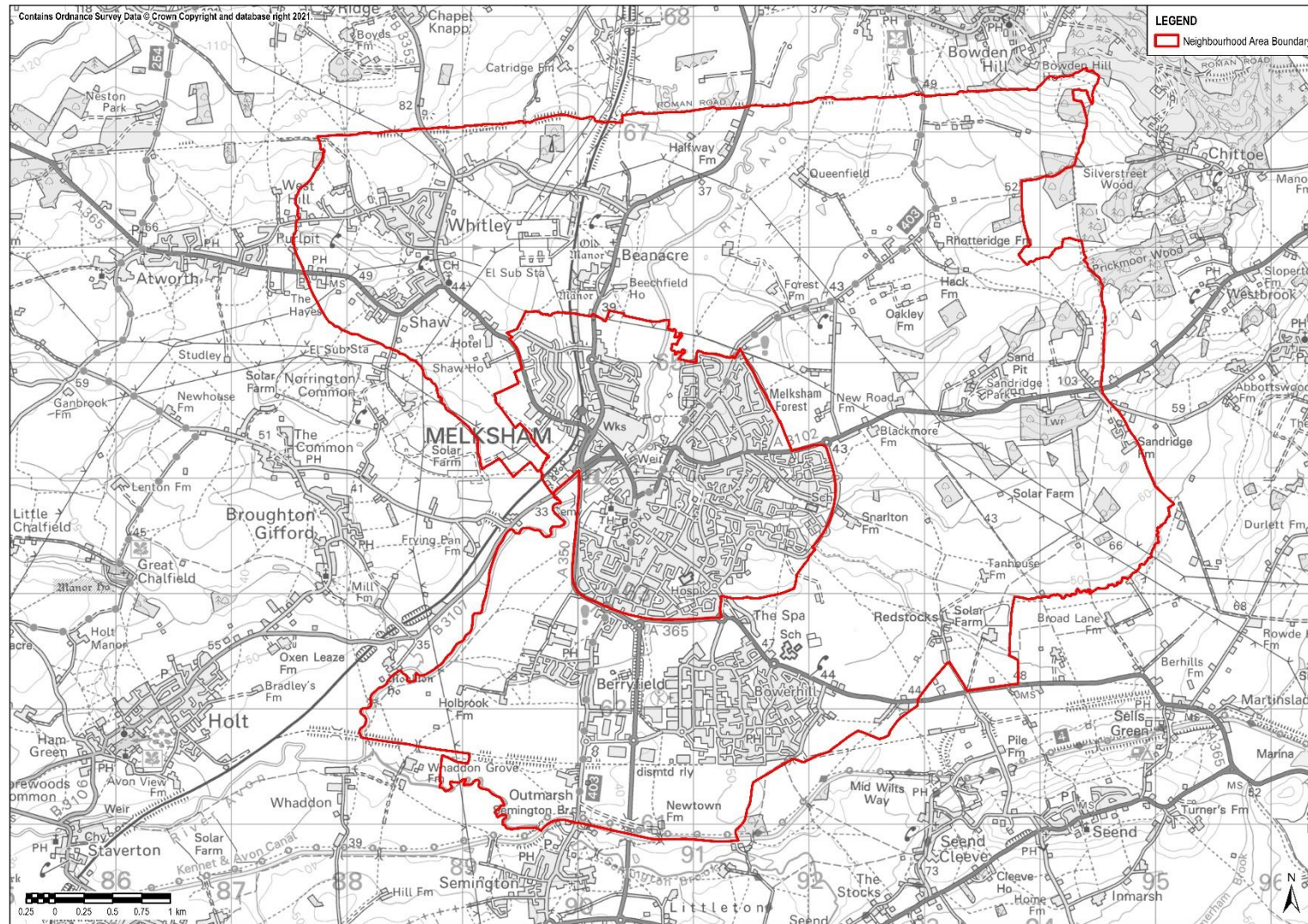
Next steps

This SEA Environmental Report accompanies the JMNP2 for Regulation 14 consultation.

Following the close of Regulation 14 consultation, any representations made will be considered by the Steering Group, and the JMNP2 and Environmental Report will be updated as necessary. The updated and final version of the SEA Environmental Report will then accompany the JMNP2 for submission to the Local Planning Authority, Wiltshire Council, for subsequent Independent Examination.

At Independent Examination, the JMNP2 will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with local planning policy.

If the Independent Examination is favourable, the JMNP2 will be subject to a referendum, organised by Wiltshire Council. If more than 50% of those who vote agree with the JMNP2, then it will be 'made'. Once made, the JMNP2 will become part of the Development Plan for the parishes.



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Figure 1.1: JMNP2 neighbourhood area boundary

1. Introduction

Background

- 1.1 AECOM has been commissioned to undertake an independent Strategic Environmental Assessment (SEA) in supporting of the emerging Joint Melksham Neighbourhood Plan.
- 1.2 The first JMNP (2020-2026) was ‘made’ in July 2021. However, in light of emerging local and national policy requirements, an updated version of the JMNP (hereafter referred to as “the JMNP2) has been prepared with a continued aim to ensure that the neighbourhood area balances the need for growth with community aspirations for the future.
- 1.3 The JMNP2 is being prepared under the Localism Act 2011⁶ and the Neighbourhood Planning (General) Regulations 2012⁷, and in the context of the Wiltshire Core Strategy 2015-2026⁸. Due regard is also given to the Wiltshire Local Plan Review 2020-2038⁹.
- 1.4 The key information relating to the JMNP2 is presented in **Table 1.1** below and the neighbourhood area is depicted in **Figure 1.1** preceding this page.

Table 1.1: Key information relating to JMNP2

Name of Responsible Authority	Wiltshire County Council
Title of Plan	Joint Melksham Neighbourhood Plan 2 (JMNP2)
Subject	Neighbourhood planning
Purpose	<p>The JMNP2 is being prepared as a neighbourhood plan under the Localism Act 2011 and Neighbourhood Planning (General) Regulations 2012. The JMNP2 is being prepared in the context of the Wiltshire Core Strategy, with due regard given to the emerging Wiltshire Local Plan Review (2020-2038).</p> <p>The JMNP2 will be used to guide and shape development within the neighbourhood area.</p>
Timescale	To 2038
Area covered by the plan	The neighbourhood area covers the civil parishes of Melksham and Melksham Without, located in Wiltshire, as shown in Figure 1.1 above.
Summary of content	The JMNP2 will set out a vision, strategy, and range of policies for the neighbourhood area.
Plan contact point	T.S, Clerk, Melksham Without Parish Council Email: clerk@melkshamwithout-pc.gov.uk

⁶ UK Government (2011) ‘Localism Act 2011’ can be accessed [here](#).

⁷ UK Government (2012) ‘The Neighbourhood Planning (General) Regulations 2012’ can be accessed [here](#).

⁸ Wiltshire Council (2022) ‘Wiltshire Core Strategy’ can be accessed [here](#).

⁹ Wiltshire Council (2022) ‘Local Plan Review’ can be accessed [here](#).

SEA Screening for the JMNP2

- 1.5 A Neighbourhood Plan requires SEA where it is likely to have significant environmental effects. In this respect, Neighbourhood Plans are more likely to be screened in as requiring an SEA if both the following apply:
- 1) the Neighbourhood Plan is being prepared within a neighbourhood area with significant environmental constraints, such as, for example, Special Areas of Conservation, Sites of Special Scientific Interest, or large concentrations of heritage assets; and
 - 2) the Neighbourhood Plan is likely to allocate sites for development¹⁰.
- 1.6 The JMNP2 has been screened in by West Suffolk Council as requiring a Strategic Environmental Assessment (SEA). The Neighbourhood Plan will allocate new development in the neighbourhood area. This includes potentially in environmentally sensitive locations, including (but not limited to): Sites of Special Scientific Interest (SSSIs) and their associated Impact Risk Zones (IRZs), local wildlife sites, Biodiversity Action Plan (BAP) Priority Habitats, listed buildings, a conservation area, a registered park and garden, a mineral resource zone, a nitrate vulnerability zone (NVZ), source protection zones (SPZs) and an Area of Outstanding Natural Beauty (AONB).
- 1.7 In light of this outcome, an SEA process is being undertaken to meet the specific requirements prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations)¹¹.

SEA explained

- 1.8 SEA is a mechanism for considering and communicating the potential impacts of an emerging plan, and potential alternatives in terms of key environmental issues. The aim of SEA is to inform and influence the plan-making process with a view to avoiding and mitigating potential negative impacts and maximising the potential for positive effects. Through this approach, the SEA for the JMNP2 seeks to maximise the emerging plan's contribution to sustainable development.
- 1.9 Two key procedural requirements of the SEA Regulations are that:
- i. When deciding on 'the scope and level of detail of the information' which must be included in the Environmental Report there is a consultation with nationally designated authorities concerned with environmental issues;
 - ii. A report (the 'Environmental Report') is published for consultation alongside the draft plan (i.e., the draft JMNP2) that presents outcomes from the environmental assessment (i.e., discusses 'likely significant effects' that would result from plan implementation) and reasonable alternatives.
- 1.10 This 'Environmental Report' is concerned with item 'ii' above.

¹⁰ DLUHC (February 2022): Chief Planner's Newsletter, February 2022 "Strategic Environmental Assessment for Neighbourhood Plans: Timely and effective screening" accessible [here](#)

¹¹ UK Government (2004) 'The Environmental Assessment of Plans and Programmes Regulations 2004' can be accessed [here](#).

Structure of this Environmental Report

1.11 This document is the SEA Environmental Report for the JMNP2 and hence needs to answer all four of the questions listed overleaf with a view to providing the information required by the SEA Regulations. Each of the four questions is answered in turn within this report, as overleaf:

Table 1.2: Questions that must be answered by the SEA Environmental Report to meet the regulatory¹² requirements

Environmental Report question	In line with the SEA Regulations, the report must include... ¹³
What is the plan seeking to achieve?	<ul style="list-style-type: none"> An outline of the contents and main objectives of the plan.
What is the sustainability 'context'?	<ul style="list-style-type: none"> Relationship with other relevant plans and programmes. The relevant environmental protection objectives, established at international or national level. Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.
What's the scope of the SEA?	<ul style="list-style-type: none"> The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan. The environmental characteristics of areas likely to be significantly affected. Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.
What is the sustainability 'baseline'?	<ul style="list-style-type: none"> The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan. The environmental characteristics of areas likely to be significantly affected. Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.
What are the key issues and objectives?	<ul style="list-style-type: none"> Key problems/issues and objectives that should be a focus of (i.e., provide a 'framework' for) assessment.
What has plan-making/SEA involved up to this point?	<ul style="list-style-type: none"> Outline reasons for selecting the alternatives dealt with. The likely significant effects associated with alternatives. Outline reasons for selecting the preferred approach in-light of alternatives appraisal/a description of how environmental objectives and considerations are reflected in the current version of the plan.
What are the assessment findings at this stage?	<ul style="list-style-type: none"> The likely significant effects associated with the Regulation 14 version of the plan. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the Regulation 14 version of the plan.
What happens next?	<ul style="list-style-type: none"> The next steps for the plan making / SEA process.

¹² Environmental Assessment of Plans and Programmes Regulations 2004

¹³ NB this column does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation.

2. Local Plan context and vision for the JMNP2

Local Plan context for the JMNP2

- 2.1 The Wiltshire Core Strategy 2015-2026 was adopted in 2015 and forms part of the development plan for the administrative area of Wiltshire. Within Core Policy 1, Melksham is identified as a 'market town'; this type of settlement "*has the ability to support sustainable patterns of living in Wiltshire through their current levels of facilities, services and employment opportunities*". Market towns have the potential for significant development that will increase homes and jobs, allowing for the maintenance and enhancement of existing services and facilities. There are other large and small villages within the neighbourhood area, and development in these areas is expected to be more limited to reflect the role and function of these settlements.
- 2.2 Wiltshire Council are currently undertaking a Local Plan Review¹⁴. Regulation 18 consultation on the emerging spatial strategy was completed between January and March 2021, and Regulation 19 consultation commenced in July 2023. The emerging Local Plan is expected to be adopted in late 2024.
- 2.3 Neighbourhood plans will form part of the development plan for Wiltshire, alongside, but not as a replacement for the Local Plan. Neighbourhood plans are required to be in general conformity with the Local Plan and can develop policies and proposals to address local place-based issues.

JMNP2 vision and objectives

- 2.4 The vision for the JMNP2 captures the community's views and aspirations for the neighbourhood area as expressed through the neighbourhood planning process. It forms the basis on which the neighbourhood objectives and proposed policies have been formulated.
- 2.5 The vision is as follows: "*To make the town of Melksham and parish of Melksham Without great places to live, work, play and to visit; attractive, health, convenient and environmentally sustainable, with access to employment, education, shops and services via walking, cycling and public transport.*"
- 2.6 The vision is accompanied by 16 objectives grouped under five statements:
 - A 21st century community... meeting the challenges of sustainable development and climate change.
 - Great places to live... where housing and infrastructure needs are balanced with global and regional issues.
 - Great places for shopping, working, and getting around.
 - Places where community wellbeing and open spaces are protected and enhanced; and
 - A locally distinctive and high quality built and natural environment.

¹⁴ Wiltshire Council (2021): 'Local Plan Review Consultation', can be accessed [here](#)

3. What is the scope of the SEA?

Summary of SEA Scoping

- 3.1 The SEA Regulations require that: “When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies”.
- 3.2 In England, the consultation bodies are Natural England, the Environment Agency, and Historic England¹⁵. These authorities were consulted on the scope of the SEA in December 2022. Additionally, Wiltshire Council were also invited to comment on the scope of the SEA.
- 3.3 The purpose of scoping was to outline the ‘scope’ of the SEA through setting out the following information:
- A context review of the key environmental and sustainability objectives of national, regional, and local plans and strategies relevant to the JMNP2.
 - Baseline data against which the JMNP2 can be assessed.
 - The key sustainability issues for the JMNP2; and
 - An ‘SEA Framework’ of objectives against which the JMNP2 can be assessed.
- 3.4 Responses received on the Scoping Report, and how they were addressed, have been summarised below. No scoping response was received from Natural England.

Table 3.1: Consultation responses received on the SEA Scoping Report

Consultation response	How the response was considered and addressed
<i>Historic England</i>	
<i>Historic Places Adviser (email response received 17th January 2023)</i>	
<p>Thank you for your consultation on the SEA Scoping associated with the proposed modified version of the made Melksham Neighbourhood Plan.</p> <p>Our last involvement in this Plan was to respond to the preceding SEA Screening consultation in the late summer of 2022. At that time, we agreed that a full SEA was required as the Plan intended to allocate sites for development, though at that time the sites which might be chosen had not been identified.</p>	<p>Comment noted.</p>

¹⁵ These consultation bodies were selected “by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effect of implementing plans and programmes” (SEA Directive, Article 6(3)).

Consultation response	How the response was considered and addressed
<p>It is not clear now whether there is any further clarification on the sites which the community may favour, but of course the SEA process and associated site options evaluation will help to inform and finesse such an exercise. It is therefore important that full and appropriate account is taken of any historic environment considerations in the form of heritage assets which may be affected by potential site allocations, and their significance used to ensure that the quantum and nature of any development does not generate harm to relevant assets which are identified.</p>	<p>Potential impacts to the historic environment associated with the policies and proposals within the Neighbourhood Plan is presented within Chapter 4 and Chapter 5 of this Environmental Report.</p>
<p>We are therefore pleased to see reference to our guidance on Conservation Areas, SEAs, Site Allocations, and Setting respectively included as relevant documents at the beginning of the section on the Historic Environment within the Scoping Report. The successful and informed identification of relevant assets, their significance, and the manner in which this should influence site selection and development, will depend greatly on the explicit and comprehensive application of this guidance.</p> <p>Otherwise, we have no additional comments on the Report.</p>	<p>The documents have been a useful source of reference during the SEA process.</p>
<p><i>Environment Agency Senior Planning Officer (email response received 2nd February 2023)</i></p>	
<p>Thank you for consulting the Environment Agency on the SEA Scoping Report for the Joint Melksham Neighbourhood Plan. We can offer the following comments in relation to the chapters within the report dated 23 December 2022 (Rev 02).</p>	<p>Comment noted.</p>

3. Biodiversity and Geodiversity

We are in agreement with the proposed SEA objectives for this section with particular emphasis on restoring and enhancing biodiversity and ecological networks. We also support the objectives related to biodiversity within the sections on climate change, and water quality.

Consultation response

How the response was considered and addressed

4. Climate Change

We note and agree that flood risk arising from fluvial and pluvial sources is identified as a key issue, but only within the climate change section. The Local Authority's Strategic Flood Risk Assessment and Surface Water Management Plans forms the evidence base to determine the level of flood risk in this area. We would like the SEA to include flood risk as a standalone sustainability issue with its own issues and objectives.

We note the objectives relating to flood risk in section 4 are limited to,

"Ensure that inappropriate development does not take place in areas at higher risk of flooding, considering the likely future effects of climate change?"

&

"Sustainably manage water run-off, reducing runoff where possible?"

Whilst we agree that these are important considerations, the plan should go beyond just avoiding inappropriate development and surface water management, to include objectives to improve the existing flood risk situation in the area and have an integrated approach to how development can drive a reduction in flood risk. This is particularly important with respect to some of the major development schemes / sites that are ongoing or may be coming forward over the plan period.

If your plan proposes development or promotes growth, we recommend early consultation with Wessex Water to determine whether there is (or will be prior to occupation) sufficient infrastructure capacity existing for the connection, conveyance, treatment, and disposal of water associated with any proposed development within environmental limits of the receiving watercourse. This may impact on the housing figures and the phasing of development.

The SFRA has been a useful source of reference during the SEA process.

Potential climate change impacts (including flood risk) associated with the policies and proposals within the Neighbourhood Plan is presented within Chapter 4 and Chapter 5 of this Environmental Report.

The SEA objective / appraisal question covering flood risk has been revisited and updated as appropriate to reflect the recommendations.

Consultation response	How the response was considered and addressed
<p>7. Land, Soil, and Water Resources</p> <p>We are pleased to see reference to the Catchment Data Explorer within the evidence base, for water quality within the plan area. We are also in agreement with the proposed SEA objectives for this section including pollution prevention and water efficiency.</p> <p>We do note however that there is no reference to the impacts of existing / historic contamination. According to our records there are several areas of historic landfill across the wider Melksham Without plan area. These areas might not be carried forward as potential development allocations, but the SEA should consider historic contamination within the potential impacts and encourage remediation where possible. More information can be found at Historic Landfill Sites - data.gov.uk</p>	<p>Potential impacts to land, soil, and water resources associated with the policies and proposals within the Neighbourhood Plan is presented within Chapter 4 and Chapter 5 of this Environmental Report.</p>
<p>8. Landscape</p> <p>The SEA report does not appear to reference the small number of permitted sites within the plan area, which may be involved in the handling, management, and disposal of waste or other activities which can have localised environmental impacts. The SEA should ensure any proposed allocations in proximity to these sites, are considered against the potential impacts such as dust, noise, and odour.</p>	<p>Potential impacts associated with the proposed site allocations taken forward within the Neighbourhood Plan are discussed in Chapter 4 and Chapter 5 of this Environmental Report.</p>
<p>General Advice</p> <p>For your information, together with Natural England, English Heritage, and Forestry Commission we have published joint guidance on neighbourhood planning, which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available to access here.</p>	<p>The guidance has been a useful source of reference during the SEA process.</p>
<p><i>Wiltshire Council Senior Planning Officer (email response received 6th February 2023)</i></p>	
<p>Thank you for consulting Wiltshire Council on the SEA Scoping Report for the JMNP. It is considered that the report adequately meets the requirements of the SEA Directive and Regulations, and we have no further comments.</p>	<p>Comment noted.</p>

3.5 The key sustainability issues and SEA Framework are presented below.

Key sustainability issues

Air quality

- According to data from 2021, there are no air quality management areas (AQMAs) in the neighbourhood area. However, it could be expected that development in the neighbourhood area could increase traffic flows to nearby locations like Bradford-on-Avon, Devizes, and Westbury, which could impact on AQMAs.
- Designated biodiversity and geodiversity sites within and in proximity to the neighbourhood area are potentially sensitive to air pollution issues.
- The JMNP2 could present opportunities to improve accessibility and support more local and sustainable journeys / connections.

Biodiversity and geodiversity

- Nationally designated sites within and in proximity to the neighbourhood area include three Sites of Special Scientific Interest (SSSI).
- Sections of the neighbourhood area overlap with SSSI Impact Risk Zones (IRZ) for the types and scale of development which may come forward be brought forward, especially to the east of the neighbourhood area and the north-eastern sections. It is therefore likely that Natural England will need to be consulted if development is proposed in these areas.
- There are 14 identified locally important sites in the neighbourhood area.
- There are a variety of Biodiversity Action Plan (BAP) Priority Habitats within and in proximity to the neighbourhood area.

Climate change and flood risk

- Wiltshire Council declared a climate emergency in 2019 and is committed to making the authority area carbon neutral by 2030.
- The transport sector continues to be a key challenge in terms of reducing emissions. The JMNP2 provides opportunities to guide development towards the most accessible locations in the neighbourhood area and require local infrastructure (including walking and cycling infrastructure) improvements where appropriate. This could include the implementation of electric vehicle (EV) charging infrastructure.
- Opportunities to influence per capita emissions could be sought through the JMNP2 process, particularly by planning for integrated and connected development, which reduces the need to travel and supports opportunities to travel by more sustainable modes.
- The neighbourhood area is at risk of varying levels of surface water flooding and has areas of land in Flood Zone 2 and Flood Zone 3 – following the watercourses that are present. Melksham, Shaw, and Whitley are particularly susceptible. Surface water run-off from development can exacerbate the risk of flooding by increasing the run-off from land to water courses.

- Opportunities to enhance the resilience of the neighbourhood area and its residents to the effects of climate change should be sought out in the JMNP2. This can include adaptation strategies, green infrastructure enhancement, flood resilience measures, infrastructure development, and increased renewable energy sources.

Community wellbeing

- Based on the 2019 Index of Multiple Deprivation (IMD) data, the neighbourhood area is most deprived in terms of 'barriers to housing and services' and 'education, skills and training', with lower super output areas (LSOAs) often being within the top 20% most deprived deciles for these sub-domains.
- As the requirements of the working population continue to change, particularly in response to the COVID-19 pandemic, there is likely to be a requirement for adaptable dwellings which can accommodate more flexible working practices.

Historic environment

- There are a variety of designated heritage assets within and surrounding the neighbourhood area, including listed buildings, a registered park and garden and Melksham Conservation Area. Development of the JMNP2 provides an opportunity to deliver a spatial strategy that avoids or minimises impacts for the historic environment.
- The JMNP2 provides an opportunity to develop the existing evidence base in relation to the historic environment. It also poses an opportunity to further heritage understanding in the neighbourhood area through exploring the heritage assets in the area.
- There is an identified heritage asset 'at risk' within the neighbourhood area. Any opportunity to restore or support appropriate management plans for the conservation of this asset should be explored.
- It will be important to ensure that future development avoids / minimises impacts upon the historic environment and maximises opportunities to improve the public realm and green infrastructure, to the indirect benefit of heritage settings.

Land, soil, and water resources

- The provisional agricultural land classification (ALC) and best and most versatile (BMV) data indicates the majority of the undeveloped land within the JMNP2 area has a low likelihood of being BMV land. Areas of high likelihood of BMV land are located around Berryfield and along the A350 to the west. Development should therefore minimise the loss of productive agricultural land, prioritising the redevelopment and regeneration of underutilised brownfield land wherever possible.
- There is a mineral resource zone within the western section of the neighbourhood area and as such Wiltshire Council may need to be consulted if development is taken forward in this section of the neighbourhood area.

- The River Avon is the main waterbody in the JMNP2 area, with some of its tributaries running through the neighbourhood area (particularly through Melksham). Impacts to water quality associated with new development areas is a key concern.
- Plan making should consider how local decisions affect water supply, such as water accessibility issues, and ensure that appropriate drainage infrastructure is in place to accommodate new development areas.

Landscape

- New development has the potential to lead to incremental change in landscape and villagescape character, and visual amenity.
- The relationship between the settlements and the open countryside is an important part of the character and special qualities of the neighbourhood area. As part of the evidence base, the neighbourhood group are completing a landscape gap assessment that will likely demonstrate this importance. It will be important to maintain the identity of the distinct communities within the JMNP2 area, including (but not limited to) Melksham, Bowerhill, Whitley, Shaw and Beanacre.

Transportation and movement

- There is a rail station in the neighbourhood area, offering links to various locations including London, Chippenham, Bristol, Bath, and Portsmouth. There is also a comprehensive bus network that runs within the neighbourhood area and externally to locations such as Trowbridge, Chippenham, and Frome.
- The JMNP2 area is well served by the road network, however it is noted there are issues with congestion on the A350. There are plans for the Melksham Bypass to help address these issues.
- There is an extensive public rights of way (PRoW) network in the neighbourhood area, and any new development areas should seek to connect with and where possible extend PRoW, supporting pedestrian and cycling opportunities for leisure, working and shopping.
- The recovery from the COVID-19 pandemic has the potential to change travel patterns in the short, medium and (potentially) longer term.

SEA Framework

3.6 The SEA Framework provides a way in which environmental effects can be defined and subsequently analysed based on standard ‘tests’. Each proposal within the current version of the JMNP2 will be assessed consistently using the Framework.

Table 3.2: SEA Framework

SEA theme	SEA objective	Assessment questions (will the proposal help to)
Air quality	Deliver improvements in air quality in the neighbourhood area.	<ul style="list-style-type: none"> • Reduce emissions of pollutants from transport? • Promote the use of low emission vehicles? • Promote enhancements in sustainable modes of transport, including walking, cycling, and public transport? • Promote enhancements to green infrastructure networks to facilitate increased absorption and dissipation of nitrogen dioxide (NO₂), particulate matter (PM₁₀) and other pollutants?
Biodiversity and geodiversity	Protect and enhance biodiversity and geodiversity within and surrounding the neighbourhood area.	<ul style="list-style-type: none"> • Avoid or, if not possible, minimise impacts on biodiversity and geodiversity, including nationally designated sites, and provide net gains where possible? • Support the integrity of the designated sites for biodiversity and geodiversity located within proximity to the neighbourhood area? • Protect and enhance habitats, semi-natural habitats, species, and the ecological network connecting them? • Support the national habitat network, particularly Network Enhancement Zone 1 and identified restorable habitat? • Achieve biodiversity net gains and support the delivery of ecosystem services and multifunctional green infrastructure services? • Increase the resilience of biodiversity in the area to the effects of climate change, including through enhancements to ecological networks? • Support and promote access to and interpretation and understanding of biodiversity and geodiversity?
Climate change and flood risk	Reduce the contribution to climate change made by activities within the neighbourhood area and increase resilience to the potential effects of climate change, including flooding.	<ul style="list-style-type: none"> • Reduce the number of journeys made and reduce the need to travel? • Promote the use of more sustainable modes of transport, including walking, cycling, public transport, and EV infrastructure? • Increase the number of new developments meeting or exceeding sustainable design criteria? • Generate energy from low or zero carbon sources, or reduce energy consumption from non-renewable resources? • Ensure that inappropriate development does not take place in areas at higher risk of flooding, considering the likely future effects of climate change?

SEA theme	SEA objective	Assessment questions (will the proposal help to)
		<ul style="list-style-type: none"> • Sustainably manage water run-off, reducing runoff where possible? • Improve the existing flood risk in the neighbourhood area? • Adopt an integrated approach to how development can drive a reduction in flood risk? • Improve and extend green infrastructure networks in the neighbourhood area? • Increase the resilience of biodiversity in the area to the effects of climate change, including through enhancements to ecological networks?
Community wellbeing	Ensure growth in the neighbourhood area is aligned with the needs of all residents, improving accessibility, anticipating future needs and specialist requirements, reducing deprivation, and supporting cohesive and inclusive communities.	<ul style="list-style-type: none"> • Provide everyone with the opportunity to live in good quality, affordable housing? • Support the provision of a range of house types and sizes? • Meet the needs of all sectors of the community? • Provide flexible and adaptable homes that meet people's needs, particularly the needs of an ageing population? • Improve the availability and accessibility of key local facilities, including specialist services for disabled and older people?
Historic environment	Protect, conserve, and enhance the historic environment within and surrounding the neighbourhood area.	<ul style="list-style-type: none"> • Conserve and enhance buildings, structures, and areas of architectural or historic interest, both designated and non-designated, and their settings? • Support access to and the interpretation and understanding of the historic environment? • Support the undertaking of archaeological investigations and, where appropriate, recommend mitigation strategies? • Protect the integrity and the historic setting of key finds of heritage interest as listed in the Wiltshire and Swindon Historic Environment Record (HER)?
Land, soil, and water resources	Ensure the efficient and effective use of land, and protect and enhance water quality, using water resources in a sustainable manner.	<ul style="list-style-type: none"> • Promote the use of previously developed land, including the regeneration of underutilised brownfield land? • Identify and avoid the development of the best and most versatile agricultural land? • Support the minimisation, reuse, and recycling of waste? • Avoid any negative impacts on water quality and support improvements to water quality? • Ensure appropriate drainage and mitigation is delivered alongside proposed development? • Protect waterbodies from pollution? • Maximise water efficiency and opportunities for water harvesting and/or water recycling? • Protect SPZs and NVZs in the neighbourhood area?
Landscape	Protect and enhance the character and quality of the immediate and surrounding	<ul style="list-style-type: none"> • Protect and enhance the local landscape, townscape and villagescape character, key sensitivities and features, and quality of place?

SEA theme	SEA objective	Assessment questions (will the proposal help to)
	landscape, townscape and villagescape.	<ul style="list-style-type: none"> • Conserve and enhance local identity, diversity, and settlement character? • Protect visual amenity and locally important views in the neighbourhood area? • Support the integrity of the landscape in the neighbourhood area in accordance with current and emerging evidence base documents?
Transportation and movement	Promote sustainable transport use and active travel opportunities and reduce the need to travel.	<ul style="list-style-type: none"> • Support the objectives within the Wiltshire Local Transport Plan to encourage the use of more sustainable transport modes? • Encourage a shift to more sustainable forms of travel and enable sustainable transport infrastructure enhancements? • Improve local connectivity and pedestrian and cyclist movement? • Facilitate working from home to reduce the use of private vehicles to access workplaces outside of the neighbourhood area? • Reduce the impact of the transport sector on climate change? • Improve road safety? • Reduce the impact on residents from the road network?

3.7 Since the publication of the SEA Scoping Report, it is acknowledged that there have been several emerging policy drivers and evidence base documents which have informed the development of the JMNP2. Key sources of evidence in this respect include the revised [NPPF](#) (2023), the [Levelling-Up and Regeneration Bill](#) (2022), and the Regulation 19 consultation on the emerging Local Plan Review (and accompanying Interim Sustainability Appraisal Report and evidence base)¹⁶.

3.8 These policy considerations and evidence base documents have been essential sources of evidence during the SEA process.

3.9 Baseline information (including the context review and baseline data as presented within the SEA Scoping Report) is presented in **Appendix A**.

¹⁶ Wiltshire Council (2023): 'Regulation 19 Consultation Portal', [online] available to access [here](#)

4. Consideration of reasonable alternatives for the JMNP2

Introduction

- 4.1 In accordance with the SEA Regulations the Environmental Report must include:
- An outline of the reasons for selecting the alternatives dealt with; and
 - The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting the preferred approach on light of the alternatives appraised.
- 4.2 The ‘narrative’ of plan-making / SEA up to this point is told within this part of the Environmental Report. Specifically, this chapter explains how the JMNP2’s development strategy has been shaped through considering reasonable alternative approaches for the location of housing in the neighbourhood area.
- 4.3 The following sections therefore describe how the SEA process to date has informed the preferred strategy for the neighbourhood area and potential locations for development.

Establishing reasonable alternatives

- 4.4 Whilst work on the JMNP2 has been underway for some time, the aim here is not to provide a comprehensive explanation of work to date, but rather to explain work undertaken to develop and appraise reasonable alternatives.
- 4.5 Specifically, there is a need to explore the strategic factors that have a bearing on the establishment of reasonable alternative approaches (i.e., in relation to the level and distribution of growth). These factors are then drawn together to arrive at reasonable alternatives.

Housing numbers to deliver within the neighbourhood area

- 4.6 The JMNP2 is being prepared in the context of the Wiltshire Core Strategy Development Plan Document (DPD), which was adopted in 2015. Wiltshire Council are also in the process of undertaking a review of the Local Plan¹⁷. Regulation 18 consultation on the emerging spatial strategy was completed between January and March 2021, with the outcomes of this consultation informing the preparation of the draft Local Plan. Regulation 19 consultation on the draft Local Plan¹⁸ commenced in July 2023.
- 4.7 With respect to housing numbers, the emerging Local Plan provides a target of 1,170 homes for the wider Melksham area during the plan period (to 2038), along with 73 homes in the villages of Shaw and Whitley¹⁹. The housing requirements are to be delivered through the following mechanisms:

¹⁷ Wiltshire Council (2021): ‘Local Plan Review Consultation’, can be accessed [here](#)

¹⁸ Wiltshire Council (2023): ‘Wiltshire Local Plan Pre-Submission Draft 2020-2038 (Regulation 19)’, accessible [here](#)

¹⁹ Wiltshire Council (2023): ‘Wiltshire Local Plan – factsheet for Large Villages and Local Service Centres’ accessible [here](#)

- Existing commitments and completions (i.e., sites which have permission already, and are either currently under construction or are likely to commence in due course).
- Strategic scale site allocations to come forward through the emerging Local Plan (i.e., likely large greenfield sites which will be subject to detail assessment); and
- A proportion of homes to be found through neighbourhood plan allocations.

4.8 Additional to the 1,170 homes for the wider Melksham area, Wiltshire Council suggests that a further 200 homes should be delivered in Melksham through site allocations identified within JMNP2. Subtracting the 23 homes which are committed or have already been delivered within Shaw and Whitley, a residual housing number of 50 homes is identified for these villages. Therefore, the JMNP2 will identify sites to deliver a total of 250 homes during the plan period.

4.9 In recognition of the above, the Neighbourhood Plan Steering Group completed a local call for sites in April 2022, along with a consideration of sites which were included in Wiltshire Council's Strategic Housing and Economic Land Availability Assessment (SHELAA).

4.10 The Neighbourhood Plan Steering Group (with support from an independent planning consultancy) completed assessments of the various sites²⁰ in the parishes in terms of their suitability, availability, and achievability for the purposes of a potential Neighbourhood Plan allocation.

4.11 Following this process, sites were given a 'red' rating (i.e., unsuitable for development), 'amber' rating (i.e., potentially suitable, with some minor constraints), and 'green' rating (i.e., suitable without constraints). Further consideration of the sites has been undertaken to inform the SEA process and is presented in the following sections of this chapter. With a view to identifying sites to meet local housing needs, the SEA has considered reasonable alternatives (i.e., options) for the focus of development in Melksham, and the focus of development in Shaw and Whitley.

Appraisal of options for the focus of development in Melksham

4.12 In recognition of the availability of brownfield site options within the neighbourhood area and considering that there are also several greenfield site options surrounding the town, the SEA has considered the relative sustainability merits of taking forward a greenfield first or a brownfield first approach to development in Melksham. The sites are shown below in **Figure 4.1**, with further detail on the sites provided in the SOA report.

²⁰ The SOA report contributes to the evidence base for the JMNP2 and accompanies the Neighbourhood Plan at Regulation 14 consultation.

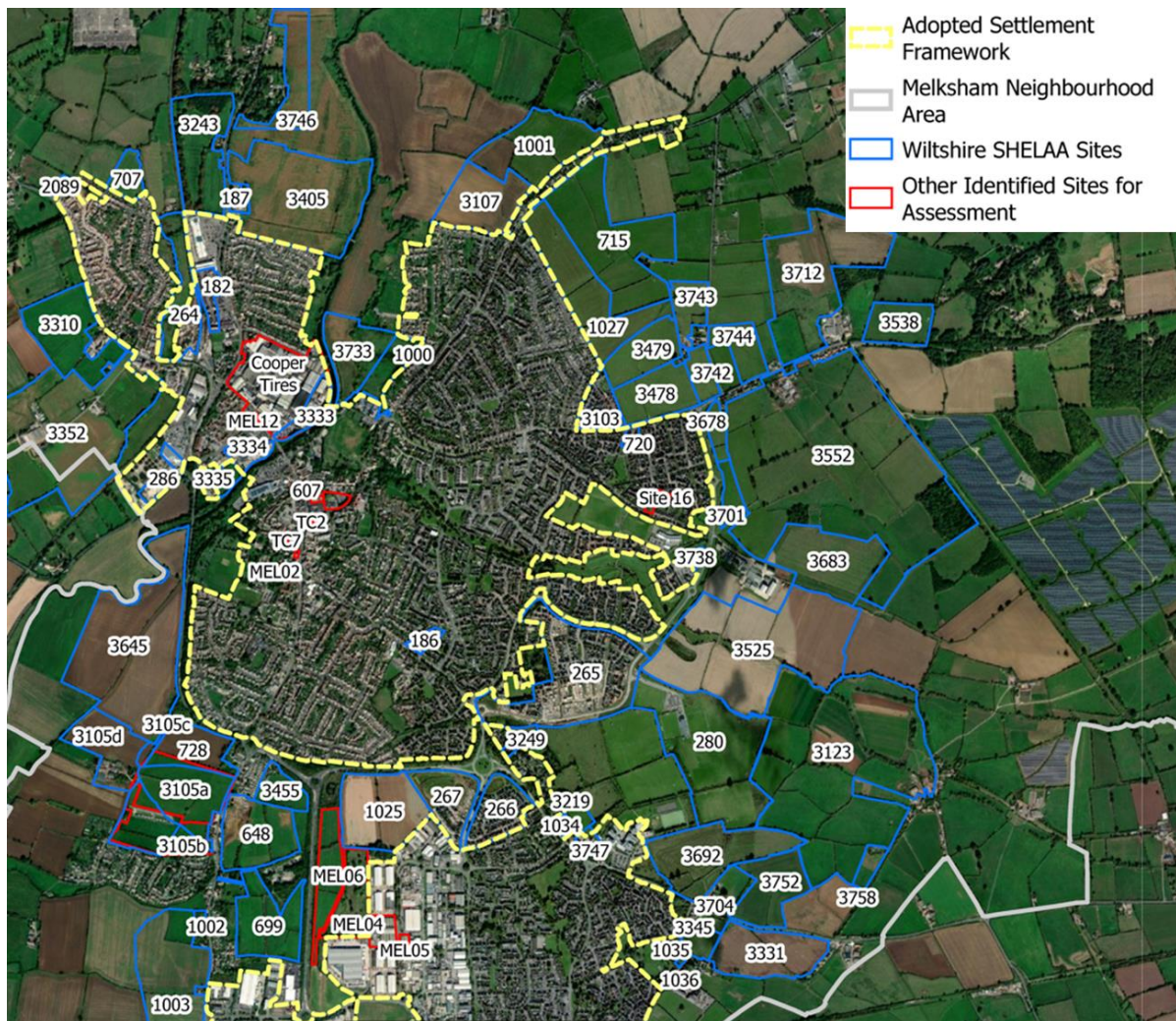


Figure 4.1: Available site options within and surrounding Melksham (and Bowerhill)

4.13 To support the choice of a development strategy for the JMNP2, the SEA process has assessed the following options as reasonable alternatives:

- **Option A:** Meeting housing needs through brownfield site allocations.
- **Option B:** Meeting housing needs through greenfield site allocations.

Appraisal findings

4.14 Utilising the SEA Framework of objectives and assessment questions developed during the earlier scoping stage of the SEA, the appraisal has been presented through the eight SEA themes which have been scoped into the assessment.

4.15 The appraisal considers the relative sustainability merits of each option. Findings are presented as a commentary on effects. To support the appraisal findings, the options have been ranked in terms of their sustainability performance against the relevant SEA theme. It is anticipated that this will provide the reader with a likely indication of the relative performance of the options in relation to each theme considered.

4.16 **Table 4.1** to **Table 4.8** below present the findings of the appraisal of the options for each of the SEA themes.

Table 4.1: Appraisal findings: Air Quality

Option A: Meeting housing needs through brownfield site allocations Option B: Meeting housing needs through greenfield site allocations		
Discussion of potential effects and relative merits of options	Rank of preference	
	A	B
<p>Key considerations with respect to the options are as follows:</p> <p>Option A</p> <ul style="list-style-type: none"> Promotes the use of sustainable transport by delivering development in the built-up area of the town, within proximity to public and active travel networks Potential to incorporate green infrastructure into development with positive impacts on air quality within the built-up area. <p>Option B</p> <ul style="list-style-type: none"> Potential to lead to the loss of trees and hedgerows (natural absorbers of pollutants) which may exacerbate air quality issues. Delivery of new homes at further distance from services and facilities and public transport networks, which may increase the reliance on private vehicles to access the town. This may increase traffic levels on key routes, with associated air quality impacts. 	1	2

Table 4.2: Appraisal findings: Biodiversity and Geodiversity

Option A: Meeting housing needs through brownfield site allocations Option B: Meeting housing needs through greenfield site allocations		
Discussion of potential effects and relative merits of options	Rank of preference	
	A	B
<p>Options which have the greatest potential to enhance ecological networks through new development areas are those which will perform the most favourably with respect to this theme. For example, ensuring proposals are designed to deliver measurable and proportionate net gains in line with national and local policy.</p> <p>Option A</p> <ul style="list-style-type: none"> Potential to improve biodiversity at sites with little to no biodiversity value by delivering ecological enhancements. Delivery of new homes at a further distance from designated sites and ecological networks in the neighbourhood area. Brownfield sites can support important habitats and species. This possibility would need to be considered through development. <p>Option B</p> <ul style="list-style-type: none"> Potential to lead to the loss of biodiversity value and disrupt existing ecological corridors through the loss of key habitats / features (e.g., through enhanced access, disturbance and trampling), in the absence of sensitive design. Proposals for larger sites have the potential to be designed incorporate green infrastructure enhancements at a scale which can positively contribute to local networks, linking areas together and positively contributing to biodiversity objectives. 	1	2

Table 4.3: Appraisal findings: Climate Change and Flood Risk

Option A: Meeting housing needs through brownfield site allocations Option B: Meeting housing needs through greenfield site allocations		
Discussion of potential effects and relative merits of options	Rank of preference	
	A	B
<p>The extent to which the Neighbourhood Plan has the potential to support climate change resilience is dependent (in part) on a distribution strategy which promotes development at locations in closer proximity to the existing services and facilities in the neighbourhood area, and the extent to which mitigation and adaptation measures are incorporated into the design of new development areas. Key considerations with respect to the options are as follows:</p> <p>Option A</p> <ul style="list-style-type: none"> • Provides opportunities for enhancing the resilience of the existing built-up area to the effects of climate change (e.g., via green infrastructure enhancements). • Development within proximity to the town centre (i.e., locations within the neighbourhood area with the widest range of services and facilities) will, to an extent, help limit greenhouse gas emissions from transport through encouraging new development in locations with proximity to the town’s amenities and public transport networks. <p>Option B</p> <ul style="list-style-type: none"> • Potential to deliver coordinated infrastructure, including decentralised energy networks contributing to climate change mitigation efforts. • Greenfield site allocations are likely to increase areas of hardstanding and potentially increase the surface water flood risks to surrounding locations. This may adversely impact the water quality of the River Avon (and its tributaries). 	1	2

Table 4.4: Appraisal findings: Community Wellbeing

Option A: Meeting housing needs through brownfield site allocations Option B: Meeting housing needs through greenfield site allocations		
Discussion of potential effects and relative merits of options	Rank of preference	
	A	B
<p>Key considerations with respect to the options are as follows:</p> <p>Option A</p> <ul style="list-style-type: none"> • Development on these sites would likely be in areas that can more readily provide easy access to community infrastructure, including employment opportunities. • Potential to enhance the quality of the public realm (as many of the available brownfield sites are likely to contain underutilised structures of varying quality which may detract from the character of the town) and improve the satisfaction of residents with their neighbourhoods as a place to live. • Higher likelihood of integration with existing communities within the existing built-up area of the town. • Recognition that many potential brownfield site options within the town are likely to be relatively small sites which limits the potential to deliver a significant number of new homes at these locations. This may reduce the potential to deliver affordable homes and homes of varying types and tenures. • Complexities of brownfield site options may reduce the viability of bringing them forward for redevelopment (e.g., multiple land ownership issues, or ground contamination concerns associated with former uses). <p>Option B</p> <ul style="list-style-type: none"> • Potential to deliver a wide range of types and tenures due to sites being typically larger in comparison to the available brownfield options. • Potential to deliver green and blue infrastructure enhancements through scheme design, linking with existing corridors and improving connectivity. • Potential to generate developer contributions for community infrastructure enhancements, supporting community wellbeing. • Less potential to deliver more homes in the most accessible locations in the neighbourhood area. • Greater potential (i.e., viability) to deliver additional community and employment uses through mixed-use developments on larger greenfield site options. • Potential impact to local green spaces, green wedges / buffers, many of which are located outside of the town in the open countryside. • Potential cumulative and in-combination effects through taking forward greenfield sites within the JMNP2, given the number of strategic greenfield site allocations likely to come forward through the emerging Local Plan. 	1	2

Table 4.5: Appraisal findings: Historic Environment

Option A: Meeting housing needs through brownfield site allocations		
Option B: Meeting housing needs through greenfield site allocations		
Discussion of potential effects and relative merits of options	Rank of preference	
	A	B
<p>In relation to historic environment constraints, the neighbourhood area contains one Grade I, five Grade II* and 219 Grade II nationally designated listed buildings, along with a registered park and garden, and Melksham Conservation Area. The Wiltshire and Swindon Historic Environment Record (HER) also identifies important and distinctive structures or features that positively contribute to the local sense of place and distinctiveness of the county. This includes 525 documented local records within the neighbourhood area – 99 in Melksham and 426 in Melksham Without.</p> <p>In this respect, potential impacts to the historic environment are possible through options which would deliver new development areas within or within the setting of designated and non-designated heritage assets and areas. Key considerations with respect to the options are as follows:</p> <p>Option A</p> <ul style="list-style-type: none"> • Potential to directly impact the significance and setting of heritage assets and areas, including listed buildings and Melksham Conservation Area. • Potential to positively impact the setting of heritage assets within the existing built-up area through the regeneration of redundant and underutilised land. <p>Option B</p> <ul style="list-style-type: none"> • Delivery of new homes at further distance from nationally designated listed buildings within the town centre. • Potential to indirectly impact the significance and setting of Melksham Conservation Area, including views into / out of the designation. • Impact to locally important heritage assets, given that most of the available greenfield site options are located in Melksham Without Parish, which contains over 400 non-designated (and locally significant) heritage assets. <p>Consultation with Historic England is encouraged to ensure that development proposals seek to implement sensitive design which respects and enhances the setting of nearby heritage assets and areas.</p>	1	2

Table 4.6: Appraisal findings: Land, Soil, and Water Resources

Option A: Meeting housing needs through brownfield site allocations Option B: Meeting housing needs through greenfield site allocations		
Discussion of potential effects and relative merits of options	Rank of preference	
	A	B
<p>Key considerations with respect to the options are as follows:</p> <p>Option A</p> <ul style="list-style-type: none"> • Supports the efficient use of land through the reuse of existing structures whilst rejuvenating and remediating areas of previously developed land. • Greater potential for ground contamination and remediation works prior to development, reducing the viability of development. <p>Option B</p> <ul style="list-style-type: none"> • Likely to lead to the loss of greenfield land, including potential areas of best and most versatile land for agricultural purposes, which cannot be mitigated. • Cumulative and in-combination effects likely from the strategic allocations proposed in the wider Melksham area through the emerging Local Plan. • Reduces the amount of open countryside which is potentially contributing to the setting of the existing town by maintaining green gaps and framing views. 	1	2

Table 4.7: Appraisal findings: Landscape

Option A: Meeting housing needs through brownfield site allocations Option B: Meeting housing needs through greenfield site allocations		
Discussion of potential effects and relative merits of options	Rank of preference	
	A	B
<p>The neighbourhood area is not within or within proximity to a National Park, Area of Outstanding Natural Beauty, or any Green Belt land. In this context, neither option would adversely impact the integrity of any nationally protected landscapes.</p> <p>At the local level, landscape, townscape and villagescape character plays an important part in understanding the relationship between people and place, identifying recognisable and distinct patterns which make one area different from another. These factors can assist in the assessment of the likely significance of effects of change resulting from new development areas, both in visual and amenity terms. Key considerations with respect to the options are as follows:</p> <p>Option A</p> <ul style="list-style-type: none"> • Protects the open countryside and landscape character by focusing development away from areas with a higher landscape sensitivity. • Prevents urban sprawl effects by allocating sites which are already located within the built-up area. • Provides opportunities to enhance townscape character and visual amenity in the built-up area. • Opportunities to enhance the public realm through regenerating underutilised sites which may detract from the character of the built environment. 	1	2

Option A: Meeting housing needs through brownfield site allocations Option B: Meeting housing needs through greenfield site allocations		
Discussion of potential effects and relative merits of options	Rank of preference	
	A	B
<p>Option B</p> <ul style="list-style-type: none"> • Potential impacts on proposed green gaps in the neighbourhood area could lead to urban sprawl effects and settlement coalescence / loss of identity. • Greater potential to negatively impact on local landscape character by allocating undeveloped sites on the border of / in the countryside. • Proposals for larger greenfield sites have the potential to positively contribute to wider landscape objectives through sensitive design. For example, delivering net gains in biodiversity and green infrastructure enhancements have the potential to help conserve and enhance landscape and villagescape character, including its special qualities and sense of place. • Larger greenfield sites have the potential to incorporate a landscaping scheme which enhances green and blue infrastructure networks. For example, enhanced habitats (trees, hedgerows, grass, shrub, etc.) can form important parts of the landscape, and also provide a role in landscape buffering and planting, providing screening to restrict undesirable views. 		

Table 4.8: Appraisal findings: Transportation and Movement

Option A: Meeting housing needs through brownfield site allocations Option B: Meeting housing needs through greenfield site allocations		
Discussion of potential effects and relative merits of options	Rank of preference	
	A	B
<p>Key considerations with respect to the options are as follows:</p> <p>Option A</p> <ul style="list-style-type: none"> • Promotes the use of sustainable transport by delivering development in the built-up area of the town, within proximity to existing public transport and active travel networks. • Encourages a strategy which would reduce the need to access travel to services, facilities, and amenities. • Potential to readily connect with pedestrian routes and the local road network, with many brownfield sites benefiting from existing access. <p>Option B</p> <ul style="list-style-type: none"> • Potential to increase the use of private vehicle usage in the neighbourhood area through developing land outside the existing built-up area of the town. • Potential to deliver new footpaths, cycleways and potentially bus services as a result of larger-scale development through greenfield site options. • The proposed A350 Melksham bypass project is likely to connect the south of Bowerhill to Lacock, with intersecting junctions at the A365 and the A3102. In this respect, taking forward greenfield sites for residential uses at locations to the south of the town might undermine the potential for the bypass. 	<p>1</p>	<p>2</p>

Summary of appraisal findings

Table 4.9: Rankings of sustainability performance against each SEA theme

SEA theme	Rank of preference	
	Option A	Option B
Air Quality	1	2
Biodiversity and Geodiversity	1	2
Climate Change and Flood Risk	1	2
Community Wellbeing	1	2
Historic Environment	1	2
Land, Soil, and Water Resources	1	2
Landscape	1	2
Transportation	1	2

4.17 Overall, Option A performs more favourably than Option B, and is ranked the most favourable option with respect to each SEA theme. A summary of the appraisal findings is discussed in more detail below.

4.18 In terms of air quality, greenfield development through Option B is more likely to lead to the loss of trees and hedgerows (natural absorbers of pollutants) which may exacerbate air quality issues. Meanwhile, brownfield development through Option A will deliver growth closer to services and facilities and public transport hubs in the town centre, reducing the likelihood of residents driving to meet their needs, with positive implications for air quality. In addition to this, Option A could deliver green infrastructure enhancements at brownfield sites (with associated air quality benefits). Nevertheless, it is also recognised that Option A has potential to contribute to air quality issues and congestion in the town centre if residents chose to drive.

4.19 Regarding biodiversity, greenfield development through Option B has potential to lead to the loss of key landscape features of biodiversity value over a large area and has the potential to disrupt existing ecological corridors. However, it is noted that proposals through Option B would still be required to deliver biodiversity net gains and has potential to deliver more coordinated green infrastructure enhancements through the design of schemes, linking with existing green and blue corridors within the neighbourhood area. Comparatively, Option A has potential to improve biodiversity at brownfield sites with little to no existing biodiversity value, which will likely be delivered due to the requirement to deliver biodiversity net gain. In addition to this, key areas of biodiversity value are largely located outside of the town centre, and in this respect, development at brownfield sites is less likely to have adverse impacts on internationally and nationally designated sites for biodiversity. Therefore, Option A is ranked more favourably than Option B.

4.20 In terms of climate change mitigation, Option B has potential to deliver more coordinated infrastructure, due to the larger size of available greenfield sites, including decentralised energy and active travel infrastructure, contributing to a reduction in operational emissions. However, Option B is also likely to lead to a higher dependency on the private car to access services and facilities and

employment opportunities in the town centre as most of the greenfield sites are located outside of the town. Meanwhile, brownfield development through Option A has potential to reduce the emissions associated with infrastructure delivery by encouraging development within the most accessible locations in the neighbourhood area, in proximity to local public transport networks. In addition to this, Option A provides opportunities to enhance the resilience of the existing built-up area of Melksham to the effects of climate change through the delivery of green infrastructure as part of scheme design (i.e., integrating sustainable drainage to tackle surface water run-off issues). Option A is also likely to lead a higher uptake of active travel and public transport as it is located close to existing footpaths, cycleways, and public transport nodes. Due to this, Option A is ranked more favourably than Option B.

- 4.21 Regarding landscape, greenfield development through Option B has potential to negatively impact landscape character by reducing the amount of open countryside surrounding the town, which contributes to the setting and feel of the town. Issues are likely to be more pronounced given the in-combination and cumulative effects resulting from the strategic greenfield site allocations which are proposed through the emerging Local Plan. Comparatively, Option A will safeguard the open countryside surrounding the town, maintaining important views, protecting green gaps and wedges between settlements, and helping to safeguard areas of high landscape sensitivity. Also, Option A, through encouraging development on potentially underutilised areas of brownfield land, has the potential to positively contribute to townscape character and enhance the quality of the public realm. However, this is dependent on the design of the schemes which come forward. Nonetheless, Option A performs more favourably with respect to this SEA theme.
- 4.22 With respect to the historic environment, greenfield development through Option B is more likely to locate development away from Melksham Conservation Area and listed buildings and performs well in this respect. However, it is noted that large-scale greenfield development will also impact views into/ out of the town, with potential to negatively impact the setting and significance of the conservation area and listed buildings. Contrastingly, brownfield development through Option A has a greater potential to impact the setting of the conservation area and listed buildings within the existing built-up area of Melksham. Nevertheless, brownfield development also provides opportunities to enhance the local townscape character, including the setting of heritage assets, through high-quality redevelopment of sites that may currently be detracting from the significance and special qualities of nearby heritage assets. However, this is dependent on the design of schemes. On balance, Option A is the preferable option.
- 4.23 In terms of land, soil and water resources, greenfield development through Option B will lead to the permanent loss of greenfield land, including BMV agricultural land, which cannot be mitigated. Conversely, brownfield development through Option A supports the efficient use of land through the reuse of existing structures, whilst rejuvenating previously developed land. Option A also has potential to lead to medium to long-term improvements to water quality and surface water drainage. In light of the above, Option A is the preferable option. However, it is noted that brownfield development is more likely to involve ground contamination and associated remediation works, which may reduce the viability of bringing forward development at these locations.

- 4.24 In terms of community wellbeing, development on greenfield land surrounding the town is likely to support the delivery of relatively large schemes which could offer a wide range of housing types and tenures, including affordable homes. It is recognised that larger greenfield sites also have the potential to generate significant contributions for community infrastructure enhancements, which is more readily achievable through Option B. Furthermore, greenfield development at the settlement edge provides easier access to the surrounding countryside, with positive impacts on the health and wellbeing of residents. A focus on brownfield development through Option A will support the delivery of housing in areas accessible to existing services and facilities and employment opportunities, positively supporting community vitality. Moreover, brownfield development has potential to enhance the quality of the public realm and improve the satisfaction of residents with their neighbourhood as a place to live. The significance of the opportunities associated with larger greenfield sites (Option B) is less relevant in the context of this neighbourhood plan, as 1) greenfield sites are coming forward through the emerging Local Plan as strategic site allocations for a significant number of homes, and 2) a key focus of the neighbourhood plan is to regenerate and rejuvenate the town centre environment. In this respect, Option A is the most preferable option.
- 4.25 Finally, in terms of transportation, Option A is ranked more favourably than Option B as it would facilitate development in the existing built-up area of Melksham, close to existing active travel and public transport networks. Whilst the potential for Option B to deliver new infrastructure, including footpaths, cycleways, and connections to the existing bus network, is recognised, this is more readily achievable through Option A.

Appraisal of options for the focus of development in Shaw and Whitley

- 4.26 The available site options within and surrounding the villages of Shaw and Whitley are shown below in **Figure 4.2**.
- 4.27 Nine of the sites have been given a 'red' rating through the SOA process, due to the environmental sensitivity of the land surrounding Shaw and Whitley. This primarily links to the heritage and landscape sensitivity issues at these locations, which includes a number of historic environment features and proposed green wedges / buffers²¹. A total of four sites have been given an 'amber' rating.
- 4.28 In light of this, the SEA has considered the sites in further detail with respect to the potential constraints and opportunities associated with taking them forward as allocations within the JMNP2. Site summaries are presented below.

²¹ The JMNP2 evidence base accompanies the Neighbourhood Plan at Regulation 14 consultation, including the heritage assessment report and the green wedge / buffer report, and is accessible [here](#)

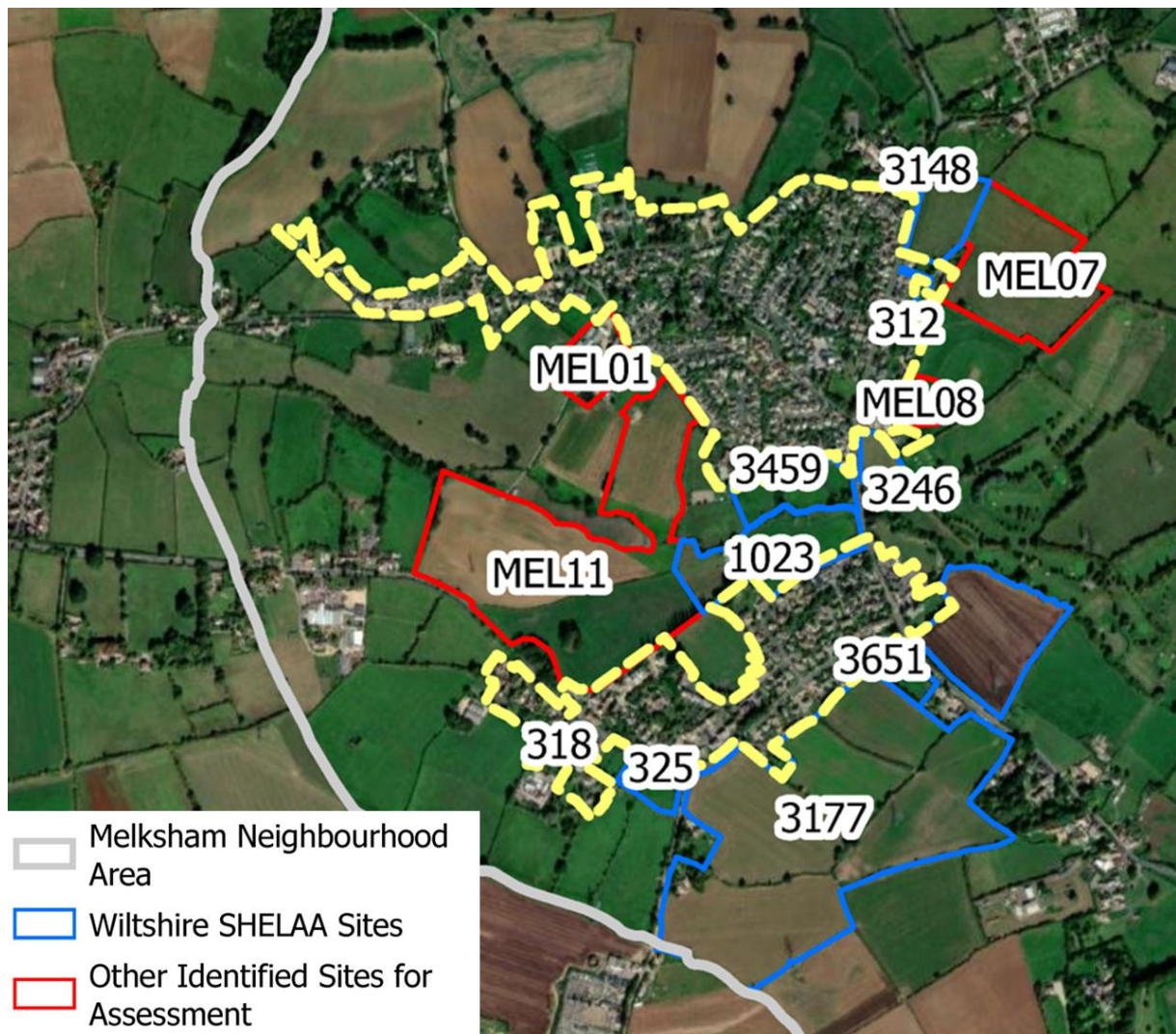


Figure 4.2: Available site options within and surrounding Shaw and Whitley

- **Site 312 'Corsham Road'**: Potentially suitable for up to four homes. Availability not confirmed. The Grade II listed C18 cottage within the site boundary is a key constraint to development at this location.
- **Site 318 '28 and 29 Shaw Hill'**: The site is confirmed to be unavailable for development.
- **Site 325 'South of Shaw House'**: Potentially suitable for up to four homes. Availability not confirmed. The site makes a positive contribution to the transition of Shaw to the open countryside and has some intervisibility with the surrounding landscape, including long distance views to Broughton Gifford. This is a key constraint to development at this location.
- **Site 1023 'Land adjacent to the Vicarage'**: Indicative capacity for up to 103 homes. The site is located along a green infrastructure corridor, with approximately 20% of the site located in Flood Zone 3. From a landscape sensitivity perspective, the site currently plays a critical role in providing a rural setting and separation between Shaw and Whitley. On this basis, the SOA concludes that the site is unsuitable for a Neighbourhood Plan allocation.

- **Site 3148 'Middle Farm, Corsham Road':** The site is allocated for residential development in the 'made' JMNP1 for approximately 18 homes (see Policy 7). A planning application is currently being prepared by a developer.
- **Site 3177 'Land at Shaw':** Indicative capacity for up to 662 homes. Over 50% of the site area to the east of Bath Road is within Flood Zone 3. From a landscape sensitivity perspective, this area encompasses the villages of Shaw and Whitley and has a level and gently undulating landscape with a predominantly rural character. The site also plays a critical role in the transition of Shaw into the open countryside, and in creating a landscape buffer between Shaw and Melksham. Development of the site would represent a significant advancement into the open countryside. On this basis, the SOA concludes that the site is unsuitable for a Neighbourhood Plan allocation.
- **Site 3246 'Land off Corsham Road':** Indicative capacity of between 15 and 24 homes. A previous application for a self-build three-bedroomed home on the site (ref: 16/11951/FUL) was refused, with the decision notice confirming that the proposed development would constitute as unwarranted encroachment of residential development on to agricultural land. The SOA concludes that the site is potentially suitable for a Neighbourhood Plan allocation, however development of the site would increase the risk of coalescence of Shaw and Whitey with some impacts on the local landscape character. Further heritage assessment work would be required to understand the development impacts on the setting of a number of listed buildings in close proximity to the site.
- **Site 3459 'Land adjacent to Lagard House':** Indicative capacity of up to 184 homes. A previous application for four homes (ref: PL/2021/06922) was refused, with the decision notice confirming that the proposed development located in the open countryside would detract from the rural character of the area, would result in urbanisation of the rural landscape, and would allow development to encroach upon the northern boundary of Shaw resulting in increasing coalescence between Shaw and Whitley. With respect to the high landscape sensitivity of the site, the SOA concludes that the site is unsuitable for a Neighbourhood Plan allocation.
- **Site 3651 'Land adjacent to Church Farm House, Bath Rd':** Indicative capacity for up to nine homes. The site is adjacent to the Grade II listed Church Farm and approximately 50 metres south of the Grade II* Christ Church. Wiltshire Council's Heritage Officer has noted that the impact of proposed development on the settings of these listed buildings is of key importance. Alongside the landscape sensitivity of this location, the SOA concludes that the site is unsuitable for a Neighbourhood Plan allocation.
- **Site MEL01 'Whitley Farm, Middle Lane':** Indicative capacity of up to 21 homes. Three existing buildings or structures on the site are Grade II listed, including Barn at Whitley Farm, Whitley Farmhouse, and the Mounting Block to Right of Farm Entrance of Whitley Farm. However, the current setting of the designated heritage structures is harmed by the modern agricultural buildings and storage units on site. Development of the site has the potential to be sympathetic to surrounding residential areas and capitalise on the underutilised nature of the site. From a landscape

perspective, whilst the site has some intervisibility with the surrounding landscape, as the site mostly consists of existing agricultural outbuildings and built structures, the change introduced by the redevelopment of the site could be potentially mitigated through sensitive design in relation to character, scale of development and the introduction of landscape buffer along the boundaries. Viability is a potential constraint to development at this location. Specifically, development of the site would require substantial removal of existing agricultural outbuildings and a water tank, as well as conversion of existing listed buildings. This is likely to impact the development cost of the site.

- **Site MEL07 ‘Land to the rear of Site 3148’:** The site is adjacent to a site which has been allocated for 18 homes within the ‘made’ JMNP1 (see Policy 7). The site contains limited landscape features at present and has a simple landform, however it makes a positive contribution to the rural and tranquil landscape character of this part of Whitley and plays a key role in supporting the transition of Whitley to the open countryside. The site is located in close proximity to several Grade II listed buildings along Corsham Road. Further heritage assessment would be required to understand the potential impacts and identify appropriate mitigation. Other key constraints identified include potential impacts on green infrastructure corridors, loss of Grade 3 Agricultural Land, and proximity to an electricity substation.
- **Site MEL08 ‘Land to the rear of Site 3246’:** The site plays a critical role in the rural transition of Whitley to the open countryside. It currently acts as a buffer between existing dwellings east of Corsham Road, including two Grade II listed buildings, and Whitley Cricket Ground. Development of the site would extend the settlement pattern beyond the established soft edge formed by a continuous line of boundary hedgerows. The SOA concludes that the site is unsuitable for a Neighbourhood Plan allocation.
- **Site MEL11:** An allocation at this location would conflict with the proposed green wedge / buffer and views of the village and open countryside as observed from the west / south west.

Developing the preferred approach

Choice of sites taken forward for the purposes of the Neighbourhood Plan

4.29 The preferred approach has been informed by the various surveys and evidence base documents prepared to support the JMNP2 (to date), responses from community consultation events, and the SOA and SEA findings.

4.30 The JMNP2 encourages developers and site promoters to work collaboratively with the community to ensure that schemes:

- Appropriately addresses any constraints to development.
- Deliver key community aspirations through the design of new development areas (e.g., the provision of new community assets and infrastructure); and
- Positively contribute towards the wider visions and objectives for the neighbourhood area.

4.31 The site-specific policies for the proposed site allocations (see **Policies 7.1 to 7.5** within the draft JMNP2) contain further detail with respect to design and mitigation considerations which aim to address any potential constraints to development. These aspects are further discussed within the plan appraisal section of the Environmental Report (presented in **Chapter 5**, below).

Melksham

4.32 To deliver the housing target of 200 homes for Melksham, the JMNP2 supports a brownfield-first approach to development (**Option A**) to be met via two site allocations. Specifically:

- Up to 150 dwellings as part of mixed development on the former Cooper Tires site; and
- Up to 50 dwellings of affordable, age restricted dwellings on the former Library site.

4.33 In terms of the selection of brownfield site allocations to include within the JMNP2, consideration has been given to the following factors:

- Whether the site is currently safeguarded for its employment uses or providing a key community benefit or service.
- Whether the site is considered to be partial / smaller site which forms part of a larger brownfield area within the town which could potentially benefit from a comprehensive approach to regeneration (e.g., via comprehensive and detailed scheme design); and
- The potential of the site to contribute to the wider vision for the town as identified within the Melksham Town Centre Masterplan, which sets out spatial guidance for the town to aid in its protection, conservation, enhancement, regeneration, and sustained vitality.

4.34 In the wider context, there are several larger greenfield site options surrounding the town which are currently being considered by Wiltshire Council as potential strategic-scale allocations within the emerging Local Plan. It is expected that the strategic-scale allocations will deliver the 1,170 new homes for the wider Melksham area, positively contributing towards local needs alongside the delivery of new community assets and infrastructure.

Shaw and Whitley

4.35 To deliver the residual housing target of 50 homes for Shaw and Whitley, the JMNP2 allocates the following sites:

- 40 dwellings on Middle Farm (Site MEL07); and
- Up to ten dwellings on the Whitley Farm site (Site MEL01).

4.36 With respect to the 'amber' sites identified within the SOA findings, Site 312, Site 318, and Site 3246 are relatively small sites (potentially accommodating up to 32 homes in total) which reduces their potential to deliver affordable housing and housing of a range of types and tenures to meet local requirements. Additionally, the combined total number of homes (based on their indicative capacities) would not meet the residual housing target of 50 homes for Shaw and Whitley as identified within the emerging Local Plan. In light of this, the

Neighbourhood Group have reconsidered the available sites within and surrounding Shaw and Whitley which were given a 'red' rating within the SOA, as none of the sites have been given a 'green' rating.

4.37 Most of the 'red' sites within and surrounding Shaw and Whitley have significant landscape sensitivity constraints to development, which is taken forward would result in a reduction of the proposed green wedges / buffers between the two villages (e.g., Site 3177 and Site 3651) and Melksham (e.g., Site 1023 and Site 3459). In this respect, the rationale for taking forward Site MEL07 is primarily linked to the following factors: 1) its location adjacent to Middle Farm which is currently allocated within the 'made' JMNP1, and 2) the relative size of the site and potential community benefits of the site (i.e., its potential to accommodate a range of housing types and tenures, alongside affordable housing requirements).

4.38 With respect to the potential constraints to development at this location, the Neighbourhood Group confirms the following:

“The site provides substantial capacity for a landscape buffer and open space to mitigate visual impacts on village setting and provide new accessible public open space (adjacent to the cricket ground and golf course). The visual impacts on open countryside are largely restricted to those from the north, with the large substation blocking views from the east.”

4.39 Regarding Site MEL01, it is recognised that there are potential viability concerns associated with bringing forward residential development at this location. Specifically, the need to demolish existing agricultural buildings on site, remove the water tank, and the potential heritage sensitivities associated with the listed buildings on site. The Neighbourhood Group confirms the following:

“We have had a heritage impact assessment undertaken (as part of the 'made' JMNP1) for this site which has identified limited developable area (as allocated in JMNP2). We are having site viability technical support to inform this site and expect Regulation 14 feedback to inform a final allocation capacity.”

5. Appraisal of the Regulation 14 version of the JMNP2

Introduction

5.1 The aim of this chapter is to present appraisal findings and recommendations in relation to the submission version of the JMNP2. This chapter presents:

- An appraisal of the current version (i.e., the Regulation 14 version) of the JMNP2 under the eight SEA theme heading.
- Consideration of potential cumulative effects; and
- The overall conclusions at this current stage.

JMNP2 policies

5.2 To support the implementation of the vision statement for the JMNP2, the Regulation 14 version of the plan puts forward 25 policies to guide new development within the neighbourhood area. Specifically:

Policy reference	Policy name
Policy 1	Sustainable Design and Construction
Policy 2	Local Renewable and Low Carbon Energy
Policy 3	Flood Risk and Natural Flood Management
Policy 4	Ultra Low Emission Vehicle Charging
Policy 5	Pre-application Community Engagement
Policy 6	Housing in Defined Settlements
Policy 7.1	Land at Cooper Tyres
Policy 7.2	Land at the Former Melksham Library Site
Policy 7.3	Land at Whitley Farm, Whitley
Policy 7.4	Land at Middle Farm Plot A
Policy 7.5	Land at Middle Farm Plot B
Policy 8	Infrastructure Phasing and Priorities
Policy 9	Town Centre
Policy 10	Employment Sites
Policy 11	Sustainable Transport and Active Travel
Policy 12	Green Infrastructure

Policy reference	Policy name
Policy 13	Biodiversity
Policy 14	Open Spaces
Policy 15	Community Facilities
Policy 16	Local Green Spaces
Policy 17	Trees and Hedgerows
Policy 18	Landscape Character
Policy 19	Green Wedges
Policy 20	Locally Distinctive, High-Quality Design
Policy 21	Local Heritage

Approach to this appraisal

- 5.3 For each theme, ‘significant’ effects of the Regulation 14 version of the JMNP2 on the baseline are predicated and evaluated. Account is taken of the criteria presented within Schedule 2 of the Regulations. For example, account is taken of the probability, duration, frequency, and reversibility of the effects as far as possible. These effect ‘characteristics’ will be described within the assessment, as appropriate.
- 5.4 Every effort is made to identify / evaluate effects accurately; however, this is inherently challenging given the high-level nature of the JMNP2. The ability to predict effects accurately is also limited by understanding of the baseline and the nature of future planning applications. Because of the uncertainties involved, there is a need to exercise caution when identifying and evaluating significant effects to ensure all assumptions are explained. In many instances it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) in more general terms.
- 5.5 Finally, it is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the SEA Regulations. So, for example, account is taken of the probability, duration, frequency, and reversibility of effects as far as possible. These effect ‘characteristics’ are described within the assessment as appropriate.

Air quality

- 5.6 According to the Wiltshire Council 2021 Air Quality ASR, there are no AQMAs within the neighbourhood area. However, new development in the neighbourhood area has the potential to indirectly impact on AQMAs within Wiltshire. This reflects the location of the neighbourhood area on the A350, connected to the strategic road network. The A350 provides access to neighbouring settlements constrained by AQMAs, such as Salisbury, Westbury, Calne, Marlborough and Bradford-on-Avon. Although it is expected that most residents in the neighbourhood area will utilise Melksham town centre for

access to local facilities and services, indirect impacts on AQMAs in surrounding towns could be expected. This particularly relates to access to employment, health, and education facilities.

- 5.7 Locally, within and around Melksham, traffic congestion is a key issue. It's noted that there is a proposal for a bypass around the town, however as a strategic matter, this will be dealt with by Wiltshire Council and the Highways Authority. What the JMNP2 can do to support improved air quality is support the uptake of active and sustainable travel choices. Policy 11 therefore requires that 'major development must demonstrate through an effective Travel Plan how sustainable transport modes are maximised, and that safe and suitable movement can be achieved for all people.' Policy 9 (Town Centre) is also noteworthy, supported by a masterplan, which will likely include active transport initiatives and improvements to green infrastructure, which would help alleviate current issues in relation to traffic and congestion.
- 5.8 Improvements to the quality of the public realm are also supported through Policy 11, as well as the wider policy framework (Policy 1, Policy 20, Policy 17, Policy 14, etc.). Notably the ecosystem services generated by trees specifically, and multi-functional green infrastructure more broadly, can include mitigating air pollution. The delivery of high-quality design in new development is therefore anticipated to include mitigation measures that support cleaner air; with the potential for long term positive effects.

Biodiversity and geodiversity

- 5.9 The neighbourhood area is constrained by nationally and locally designated biodiversity sites, and includes a network of green infrastructure, covering green spaces, and other green features such as woodlands and verges, together with water courses.
- 5.10 In terms of the site allocations in Melksham, the JMNP2 allocates two brownfield sites within the town. In this respect, growth is directed away from areas of biodiversity importance. Additionally, no habitats, including BAP priority habitats, will be lost as a result of development at these locations, with opportunities to enhance the ecological value of the sites through incorporating green infrastructure through design. Development of brownfield land also provides the opportunity to improve biodiversity in areas that often have low biodiversity value through the delivery of net gains.
- 5.11 Under the Environment Act 2021, all planning permissions granted in England (with a few exemptions) will have to deliver at least 10% Biodiversity Net Gain (BNG) from a start date of January 2024. Policy 89 (Biodiversity Net Gain) of the Wiltshire Local Plan Review sets higher ambitions, with a minimum of 20% BNG or higher, and this is reiterated through the JMNP2. Notably Site allocation Policy 7.2 sets a requirement for masterplanning to ensure the site will achieve a minimum of 20% net gain over the pre-development biodiversity.
- 5.12 Regarding the site allocations in Shaw and Whitley, it is recognised that the sites contain and are bordered by some areas of ecological value, including semi-mature trees and hedgerows. With further respect to these sensitivities, a key objective within the JMNP2 is to respect and enhance the natural environment. This is recognised and acknowledged within several policies which will 1) help limit potential effects on features and areas of ecological

interest and 2) support the resilience of green infrastructure networks. This is further discussed below.

- 5.13 For example, Policy 12 (Green Infrastructure) and Policy 13 (Biodiversity) support the protection and enhancement of these designated biodiversity sites, the creation of new green infrastructure, and improved connectivity of existing green infrastructure. The policies further set requirements for development proposals, including major development and solar farms, with the aim of protecting and enhancing the quality and connectivity of biodiversity within the neighbourhood area.
- 5.14 The nature, scale, timing, and duration of some development activities can result in the disturbance of protected species. This can include effects of poor air quality on designated sites, and severance of ecological networks from new development areas. In this respect, the JMNP2 also sets out provisions which will support and enhance habitats, species, and ecological networks. For example, it is noted that the proposed green wedges / buffers and open spaces are of multifunctional benefit, contributing to the neighbourhood area's green infrastructure resource by providing important biodiversity spaces. Policy 19 and 14 recognise this, notably Policy 19 ensures any development retains important elements such as trees and hedgerows. Policy 17 (Trees and Hedgerows) also sets specific development requirements in relation to these features, further recognising their contribution to the biodiversity value of the neighbourhood area's natural environment.
- 5.15 While proposals are also supported for renewable and low carbon energy projects, it is noted that these will only be supported the proposal does not have an unacceptable impact on features of biodiversity importance (Policy 2: Local Renewable and Low Carbon Energy).
- 5.16 Overall, Neighbourhood Plan policies should help ensure that ecological sensitivities are appropriately considered during the planning, construction, and operational phases for new development proposals which come forward during the plan period, whilst also delivering net gains.

Climate change and flood risk

- 5.17 Key changes introduced through the JMNP2 reflect changing national and local climate change objectives and targets, aligning with new evidence including the Wiltshire 2022-2027 Climate Strategy and relevant policies of the emerging Local Plan which covers the period to 2038.
- 5.18 In terms of mitigating climate change, Policy 1: Sustainable Design and Construction supports development schemes where they demonstrate how carbon emissions are minimised, with a target of net zero emissions in operation. This includes embedding the Energy Hierarchy within building design, and using appropriate sustainability assessment tools such as BREEAM, to demonstrate that buildings are built to high environmental standards.
- 5.19 As evidenced by the number of solar farms, solar is a particularly good form of renewable energy for the area. Policy 2 therefore sets out support for Local Renewable and Low Carbon Energy proposals/ projects, where certain criteria

is met. This includes appropriate siting and scale, impacts on environmental constraints, and ensuring benefits to the community.

- 5.20 Provisions set out in Policy 11 (Sustainable and Active Travel) and Policy 4 (Ultra Low Emission Vehicle Charging) are likely to be effective at reducing emissions from transport, targeting local improvements that will support a modal shift towards active travel and electric vehicles. These policies will help reduce emissions by supporting a modal shift to more sustainable modes of transport, including walking, cycling and the use of bus and train.
- 5.21 In terms of climate adaptation, it is noted that the neighbourhood area is at varying risk of flooding, reflective of the River Avon, its floodplains and tributaries. Flooding is a significant issue for parts of the north west and south eastern sections of the neighbourhood area, including Whitley, Shaw, Melksham Town, Bowerhill and Beanacre. The NPPF and Planning Practice Guidance together with the adopted and emerging Local Plan (Policy 4 – Addressing Climate Change and Policy 95 – Flood Risk) highlight the importance of development taking place in areas at least risk of flooding where possible. This is reiterated through Policy 3: Flood Risk and Natural Flood Management and supporting Melksham Design Guidance and Codes (2023), which seeks to ensure all development demonstrate how flood risk is mitigated.
- 5.22 These policy provisions will positively respond to the potential effects of climate change from the proposed site allocations (particularly from extreme weather events) through providing summer shading and shelter and reducing surface water run-off issues. Additionally, in terms of the site allocation at the Cooper Tires site, significant parts of the site are within Flood Zones 2 and 3. In this respect, the JMNP2 requires that masterplanning addresses flood risk and water management in conformity with national and local planning policies, as well as JMNP Policy 3 (Flood Risk and Natural Flooding Management).
- 5.23 In terms of the wider policy framework, it is recognised that well planned green infrastructure can help an area adapt to and manage the risks of climate change (including flood risk). Providing and enhancing green infrastructure within the neighbourhood area is therefore a key opportunity in which the JMNP2 can help to promote climate change adaptation measures. Key policies in this regard include Policy 20: Locally Distinctive, High Quality Design, Policy 12: Green Infrastructure), and Policy 17: Trees and Hedgerows).

Community wellbeing

- 5.24 Within Melksham, the JMNP2 has taken a pro-active approach in identifying and allocating available brownfield sites within the town to meet local housing requirements. In this respect, the JMNP2 has a strong aspiration and focus to revitalise the town centre environment by facilitating the delivery of high-quality design through the regeneration of previously developed land. The housing target of 200 homes is met through the following allocations:
- Up to 150 dwellings as part of mixed development on the former Cooper Tires site; and
 - Up to 50 dwellings of affordable, age restricted dwellings on the former Library site.

- 5.25 For Shaw and Whitley, the JMNP2 recognises the key sensitivities of the sites surrounding the villages, particularly with respect to landscape capacity and local heritage significance. The housing target of 50 homes is met through two allocations. Specifically, 40 dwellings on Middle Farm (Site MEL07); and up to ten dwellings on the Whitley Farm site (Site MEL01).
- 5.26 In light of the above, the JMNP2 encourages developers and site promoters to work collaboratively with the community (see Policy 5) to ensure that schemes:
- Appropriately addresses any constraints to development.
 - Deliver key community aspirations through the design of new development areas (e.g., the provision of new community assets and infrastructure); and
 - Positively contribute towards the wider visions and objectives for the neighbourhood area.
- 5.27 The choice of site allocations have been informed by the various surveys and evidence base documents prepared to support the JMNP2, responses from community consultation events, and the SEA and SOA findings. This is further discussed within **Chapter 4** of the Environmental Report, presented above.
- 5.28 More broadly with respect to housing provision, the Neighbourhood Plan also supports opportunities to deliver housing for specific demographics within the neighbourhood area which could benefit from additional provision (e.g., the elderly population, or vulnerable groups with protected characteristics), along with delivering homes of a range of types, tenures, and affordability. This will help to ensure that development is reflective of the needs of the community and is appropriate for its location. Key policies in this respect include the site allocation policies (Policies 7.1 – 7.5), Policy 6 (Housing in Defined Settlements) and Policy 8 (Infrastructure Phasing and Priorities).
- 5.29 The quality of development is a key influence on the quality of life of residents. Neighbourhood Plan provisions primarily focus on ensuring that appropriate mitigation measures are incorporated to address any potential constraints to development, in addition to ensuring that new development is safe, attractive, inclusive, and accessible, incorporates an appropriate mix of new housing, and does not cause unnecessary noise and light pollution. Key policies in this regard include the site allocation policies (Policies 7.1 – 7.5), Policy 11 (Sustainable Transport and Active Travel), and Policy 20 (Locally Distinctive, High-Quality Design), with these stipulations also helping to improve the health and wellbeing of the community by encouraging active lifestyles.
- 5.30 The quality of housing will also be supported by Policy 1 (Sustainable Design and Construction) and Policy 2 (Local Renewable and Low Carbon Energy) which set out several provisions which seek to support energy efficient and low carbon development. This will help to address issues such as fuel poverty, which is important in the current economic climate given the rising costs of living. In this respect the JMNP2 will help facilitate the delivery of high quality and inclusive homes and neighbourhoods with the potential to promote the physical and mental health and wellbeing of residents.
- 5.31 Furthermore, the inclusion of key design principles within the Melksham Design Guidelines and Codes²² document will provide an extra level of detail and

²² AECOM (2023): 'Melksham Design Guidelines and Codes', accessible [here](#)

certainty, helping to ensure local knowledge and aspirations are taken into consideration during development design.

- 5.32 A key aspect of the Neighbourhood Plan is to ensure that the provision of community facilities and recreation facilities continues to reflect the needs of a changing and increasingly diverse population, and that these facilities are accessible to all. A key policy in this respect is Policy 15 (Community Facilities) which seeks to protect and support the provision of local services and facilities to enable people to live locally. The Neighbourhood Plan also seeks to promote the economic vitality of the neighbourhood area and support employment opportunities, specifically through Policy 9 (Town Centre) and the Melksham Town Centre Masterplan²³. For example, opportunities for the expansion of existing employment sites is supported in principle, subject to neighbourhood and local policy provisions. Proposals at key locations within the town centre environment are also supported in principle providing that they would deliver public realm enhancements, enhance accessibility and connectivity within the town centre, and improve the quality of the surrounding built environment. This will help to maintain and revitalise the local economy and town centre environment, positively enhancing community vitality.
- 5.33 Further supporting quality of life, the JMNP2 seeks to protect local open spaces and important green wedges / buffers which positively contribute to the neighbourhood area's sense of place and public realm. Additionally, the JMNP2 continues to safeguard a future route of the Wilts and Berks canal and to enable its delivery to provide significant economic, environmental, and social benefits for Melksham. These policies will support physical and mental health and wellbeing for residents and visitors to the neighbourhood area.

Historic environment

- 5.34 There is a variety of designated heritage assets within and surrounding the Neighbourhood Area, including listed buildings, a registered park and garden Melksham Conservation Area, and The Spa. Melksham has a historic town centre, with the Neighbourhood Plan highlighting the need to protect the Conservation Area and its listed buildings. There is no appraisal or management plan available for the Conservation Area, and this is identified as an evidence gap for the area.
- 5.35 The JMNP2 has taken a proactive approach to protecting and enhancing the historic environment. With reference to the proposed site allocations (see Policies 7.1 – 7.5), the key heritage constraints and considerations for development proposals are recognised through the proposals, including specific guidance and requirements for heritage assets and archaeology.
- 5.36 These sensitivities are further reflected by Neighbourhood Plan policies and proposals which focus on the conservation and enhancement of both designated and non-designated heritage assets, and their settings. Specifically, the design stipulations under Policy 20 (Locally Distinctive, High-Quality Design) and Policy 21 (Local Heritage) will guide new development proposals that may come forward during the plan period to respect their surroundings. They will also ensure development proposals work to improve the quality of the built environment through the consideration of materials to

²³ AECOM (2023): Melksham Town Centre Masterplan', accessible [here](#)

use, public realm improvements and appropriate building form. Alongside the provisions within the Melksham Design Guidelines and Codes document, this will benefit the historic environment by ensuring new development does not detract from the historic character of the area or the setting of heritage features. Furthermore, proposals must have regard to the National Design Guidance and Wiltshire Council design policy, which ensures high standards of design to protect and enhance the historic environment.

- 5.37 Recognising the absence of a Conservation Area Appraisal, Policy 21: Local Heritage requires that Proposals for development within the Melksham Conservation Area and those that may affect listed buildings or structures within the neighbourhood area, must show how they preserve or enhance the setting, characteristics and special qualities that make up the architectural and historic character. The policy also considers other areas of local heritage importance, including archaeological importance, and buildings or structures identified as Non-designated Heritage Assets. The policy therefore performs positively overall, helping to meet JMNP2 objective 15: Ensuring that new development is sympathetic to our built heritage and the character of the area.
- 5.38 Where development is proposed in the town centre, Policy 9 (Town Centre) ensures the proposal is in keeping with the scale and character of the centre of Melksham and, where appropriate, preserves or enhances the Conservation Area. This approach aligns with the National Design Guide (2021), which recognises the need to “respond positively to the pattern of uses and activities, including community facilities and local services”.

Land, soil, and water resources

- 5.39 The JMNP2 has a strong focus on protecting the open countryside from inappropriate levels of development. For example, several policies seek to protect key features of landscape and biodiversity interest in the open countryside. While these policies do not specifically seek to address land, soil and water resources, the policies will indirectly help promote and protect these resources, including the promotion of high-quality green networks in the neighbourhood area and the protection and enhancement of key features. This will help support the capacity of the landscape to regulate soil and water quality.
- 5.40 With respect to the proposed site allocations through Policies 7.1 – 7.5, the sites within Melksham are areas of brownfield land which will support the most efficient use of land in the neighbourhood area. The sites are Shaw and Whitley are areas of greenfield land. Allocations at these locations will result in the permanent loss of greenfield land at these locations, which cannot be mitigated. However, it is important to recognise that the total number of homes to be delivered through the sites (totalling 50 homes) is perhaps less significant in the context of the 1,170 homes which are being brought forward in the wider Melksham area through strategic greenfield sites in the emerging Local Plan.
- 5.41 In terms of water resources, Wessex Water are likely to maintain adequate water services over the plan period. Nonetheless, it is recognised that new development has the potential to affect water quality and availability through increased consumption and pollution, wastewater discharges, water runoff and modification. The Melksham Design Guidelines and Codes (July 2023),

includes a section which addresses water management, and this is referenced within Policy 20, and specific site allocations policies.

Landscape

5.42 The neighbourhood area is not within or within proximity to a National Park, Area of Outstanding Natural Beauty, or any Green Belt land. In this context, the proposed site allocations through Policies 7.1 – 7.5 are not likely to adversely impact the integrity of any nationally protected landscapes.

5.43 At the local level, landscape, townscape and villagescape character play an important part in understanding the relationship between people and place, identifying recognisable and distinct patterns which make one area different from another. Landscape, townscape and villagescape character can assist in the assessment of the likely significance of effects of change resulting from new development areas, both in visual and amenity terms.

5.44 An overview of the landscape, townscape and villagescape considerations for the proposed site allocations (and how these have been addressed through Neighbourhood Plan policy provisions) is provided below:

- The Melksham site allocations are brownfield sites within the town which (in their current form) potentially detract from the sense of place and character of the public realm and townscape. Proposals will be expected to be accompanied by a masterplan which provides a comprehensive landscaping scheme to appropriately reflect the special qualities of the built environment.
- The Shaw and Whitley site allocations are particularly sensitive from a landscape capacity perspective. In this respect, the JMNP2 confirms that the sites should accommodate appropriate landscape buffers and open spaces to minimise any potential impacts. Whilst the sites are areas of greenfield land, it is important to recognise that the total number of homes to be delivered through the sites (totalling 50 homes) is perhaps less significant in the context of the 1,170 homes which are being brought forward in the wider Melksham area through strategic greenfield allocations in the emerging Local Plan.

5.45 With further respect to these sensitivities, it will be important for development to consider the key characteristics of the local landscape and the key features that contribute to the special qualities of the neighbourhood area. A key policy in this regard is Policy 18 (Landscape Character), requiring that schemes draw upon local landscape characteristics, and reference relevant existing landscape assessments. Policy 18 also requires proposals respond sensitively to the transition between settlement edge and countryside, which is reinforced through Policy 19 (Green Wedges). Green Wedges have been designated and mapped through the JMNP2, with development restricted in these locations (in accordance with criteria set out). Green Wedges seek to prevent the coalescence of the neighbourhood area's town/ villages and protect local character and identity, with the potential for long term positive effects.

5.46 More broadly, Policy 20: Locally Distinctive, High Quality Design supports development proposals that contribute positively to the conservation, enhancement, and extension of the quality and local distinctiveness of

Melksham and Melksham Without. In addition to having regard to the National Design Guide, and Wiltshire Council Design Policy, proposals must demonstrate how they have been informed by the Melksham Design Guidelines and Codes. This is with the aim of ensuring development in the plan area is designed to complement and strengthen local character and distinctiveness. This will also help guide development to be in-keeping with the surrounding environment, reducing the visual impact of the development and respecting the important relationship between the built and natural environment.

Transportation and movement

- 5.47 Melksham has good transport connections, including Melksham railway station, however otherwise public transport options are relatively limited, and traffic congestion is a key issue. This reflects the location of the neighbourhood area on the A350 between Chippenham and Trowbridge, connecting with the M4 and the wider south west.
- 5.48 Regarding connectivity and accessibility within the neighbourhood area, development proposals should encourage opportunities to help increase sustainability, connectivity, and accessibility (where possible). Key policies in this respect include Policy 9 and Policy 11 which encourage active and sustainable transport options within the neighbourhood area (including through the design of new development areas) wherever possible.
- 5.49 More broadly in relation to transportation, an A350 bypass²⁴ to the town is a priority to improve the efficiency of the transport network and lead to other benefits for the town. The JMNP2 supports the delivery of this project, although it is recognised that this beyond of the scope of the Neighbourhood Plan to directly address.

Conclusions at this current stage

- 5.50 In the context of the above, the assessment has concluded that the Regulation 14 version of the Neighbourhood Plan is likely to have **long-term positive effects in relation to the 'Community Wellbeing' SEA theme**. This primarily links to the Neighbourhood Plan's support for high-quality development proposals which would deliver suitable and appropriate housing for the local community (via a range of types, tenures, and affordability), safeguard and improve the availability of services, facilities and amenities, and support opportunities for town centre regeneration. These policy provisions will support social inclusion, and community and economic vitality. The Neighbourhood Plan is also likely to facilitate improvements to the public realm (including through green infrastructure enhancements) and encourage healthy outdoor recreation and relaxation. These policy provisions will support the quality of life of residents. Furthermore, the inclusion of key design principles within the Melksham Design Guidelines and Codes document will provide an extra level of detail and certainty, helping to ensure local knowledge and aspirations are taken into consideration during development design.

²⁴ The proposed A350 Melksham bypass project is currently at non-statutory public consultation stage, with a draft Outline Business Case submitted to the Department for Transport. The Preferred route published as part of the second public consultation connects the south of Bowerhill to Lacock, with intersecting junctions at the A365 and the A3102.

- 5.51 The Neighbourhood Plan will also deliver **long-term positive effects in relation to the 'Landscape' and 'Historic Environment' SEA themes**. These benefits largely relate to the Neighbourhood Plan's emphasis on protecting and enhancing the relationship between natural and built environment, protecting important landscape and heritage features, and facilitating improvements to the quality of the public realm. While the proposed site allocations are sensitive from a landscape and heritage perspective, it is considered that the neighbourhood plan policies provide a detailed overview of the proposed mitigation and enhancement measures which pro-actively and positively address the sensitivities.
- 5.52 Additionally, **the Neighbourhood Plan will bring minor long-term positive effects in relation to the 'Biodiversity and Geodiversity' SEA theme** by encouraging proposals to protect existing and establish new habitats, enhance ecological networks (including through green infrastructure enhancements), and deliver net gains.
- 5.53 **Uncertain effects are considered likely in respect to climate change and flood risk**. The Neighbourhood Plan has the potential to lead to positive effects through supporting proposals that promote the inclusion of low carbon technologies and the use of local and traditional building materials, encourage sustainable and active travel, and proactively respond to the potential impacts of climate change through the implementation of appropriate drainage solutions. However, it is recognised that new development would lead to inevitable increases in greenhouse gas emissions due to an increase in the built footprint of the neighbourhood area.
- 5.54 The plan also makes provision for transportation and air quality; encouraging proposals which would deliver new and enhanced public rights of way and improvements to the local transport network. This will allow for safe and active transportation around the neighbourhood area and better access to locations further afield. As such, **minor long term positive effects are anticipated for transportation and air quality** through the implementation of the JMNP2.
- 5.55 It is expected the Neighbourhood Plan will bring forward **minor long term positive effects for land, soil, and water resources** in the neighbourhood area by incorporating several provisions will help support the capacity of the landscape to regulate soil and water quality. The allocations within Melksham support a brownfield-first approach to development, encouraging the most efficient use of previously developed land. Whilst the proposed site allocations at Shaw and Whitley are areas of greenfield land, it is important to recognise that the total number of homes to be delivered through the sites (totalling 50 homes) is perhaps less significant in the context of the 1,170 homes which are being brought forward in the wider Melksham Area through strategic greenfield allocations in the emerging Local Plan.

6. Next steps

- 6.1 This SEA Environmental Report accompanies the JMNP2 for Regulation 14 consultation.
- 6.2 Following the close of Regulation 14 consultation, any representations made will be considered by the Steering Group, and the JMNP2 and Environmental Report will be updated as necessary. The updated and final version of the SEA Environmental Report will then accompany the JMNP2 for submission to the Local Planning Authority, Wiltshire Council, for subsequent Independent Examination.
- 6.3 At Independent Examination, the JMNP2 will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with local planning policy.
- 6.4 If the Independent Examination is favourable, the JMNP2 will be subject to a referendum, organised by Wiltshire Council. If more than 50% of those who vote agree with the JMNP2, then it will be 'made'. Once made, the JMNP2 will become part of the Development Plan for the parishes.

Appendix A SEA Scoping – Context review and baseline information

A.1 Air quality

Focus of theme

This chapter presents the policy context and baseline summary in relation to the air quality SEA theme. The theme focuses on air pollution sources, air quality hotspots, and air quality management within and surrounding the neighbourhood area. This information is used to identify key issues (both constraints and opportunities) before proposing a relevant SEA objective and supporting assessment questions.

Policy context

Table A1.1 below presents the most relevant documents identified in the policy review for the purposes of the SEA.

Table A1.1: Plans, policies and strategies reviewed in relation to the air quality SEA theme

Document title	Year of publication
Environment Act	2021
National Planning Policy Framework (NPPF)	2021
The Clean Air Strategy	2019
A Green Future: Our 25 Year Plan to Improve the Environment	2018
UK plan for tackling roadside nitrogen dioxide concentrations	2017
Environment Act	1995
Wiltshire Council 2021 Air Quality Annual Status Report	2021
Wiltshire Council - Consultation report and next steps	2021
Wiltshire Council - Local Plan Review consultation	2021
Joint Melksham Neighbourhood Plan 2020-2026	2020
Wiltshire Council Air Quality Strategy 2019-2024	2019
Wiltshire Council Air Quality Action Plan	2015
Wiltshire Council - Wiltshire Core Strategy	2015

The key messages emerging from the review are summarised below:

- The JMNP2 will need to consider the principles outlined in the National Planning Policy Framework (NPPF), which seek to reduce or mitigate air quality impacts during development whilst simultaneously taking advantage of opportunities to improve air quality. Measures include, but are not limited to; sustainable transport solutions, limiting the need to travel, compliance with pollutant limits or objectives, and the enhancement of green infrastructure. Smaller-scale development should consider the potential for cumulative effects in relation to air quality. The NPPF also states that planning policies should contribute towards compliance with pollutant limit levels or national objectives; acknowledging air

quality management areas, clean air zones and the cumulative impacts from individual sites in local areas. Moreover, the NPPF indicates that new and existing developments should be prevented from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of air pollution.

- The Clean Air Strategy outlines how the government will tackle all sources of air pollution. The strategy proposes goals to cut public exposure to particulate matter pollution and outlines required action to meet these goals. Furthermore, it seeks to recognise wider sources that cause poor air quality, such as diffuse sources and smaller contributors. The proposed measures include new legislation and local powers to act in areas with air pollution issues. The Air Quality Strategy for Wiltshire (2019-2024) seeks to reflect this strategy on a more localised scale.
- The 25 Year Environment Plan establishes how the government will expand net gain approaches to include air quality improvements, such as planting more trees in urban areas and changing fuel supplies. In particular, 'Goal 1 Clean air' and the policies contained within 'Chapter 4: Increasing resource efficiency and reducing pollution and waste' directly relate to the air quality SEA theme.
- The UK plan for tackling roadside nitrogen dioxide is focused on lowering nitrogen dioxide (NO₂) emissions to statutory limits as quickly as possible. The plan acknowledges that an improvement in air quality and a reduction in emissions is important and aims to position the UK at the forefront of vehicle innovation by making motoring cleaner.
- Local authorities are required to monitor air quality across the district, report regularly to Defra and act where nationally set levels and limits of pollutants are likely to be exceeded under Section 82 of the Environment Act (1995). Monitoring is undertaken to assess levels of nitrogen dioxide, sulphur dioxide, ozone, benzene, and particulates. Where exceedances exist, areas are declared as air quality management areas (AQMAs) and local authorities are required to produce an air quality action plan (AQAP) to improve air quality in the area. Under Schedule 11 in the Environment Act (2021), a local authority must identify any parts of its area in which it appears air quality standards or objectives are not likely to be achieved within the relevant period. Additionally, local authorities must also identify relevant sources of emissions that are considered partly or wholly responsible for failing to achieve air quality standards or objectives in the area. As such, the Wiltshire 2021 Air Quality Annual Status Report (ASR) is the last available report for the neighbourhood area; fulfilling the requirements of the local air quality management (LAQM) as set out in Section 82 of the Environment Act (1995).
- The Air Quality Action Plan for Wiltshire sets out "the strategic and locally generated actions that will be implemented to improve air quality and work towards meeting the air quality objectives." This plan builds off the Air Quality Strategy for Wiltshire (2019-2024) and identifies 17 strategic actions that will help to achieve the goal of reducing levels of nitrogen dioxide and fine particulate matter in Wiltshire. A sample of those strategic actions include:
 - Establish community air quality action plan groups under the Area Boards.

- Provide air quality data and information to Area Boards to assist with the production of Community Air Quality Action Plans and Community Neighbourhood Plans.
 - Integrate air quality into wider policies and strategies within the council and the adoption of Core Policy 55 in the Wiltshire Core Strategy.
 - Integrate green infrastructure considerations into Wiltshire Council policy and strategy and to adopt the Wiltshire Council Green Infrastructure Strategy to support Core Policy 52 of the Wiltshire Core Strategy.
 - Integrate wider climate change policies that share common goals on carbon and nitrogen dioxide reduction into Wiltshire strategies and policies.
 - Develop in conjunction with Public Health Wiltshire a text alert system which will be targeted at people with respiratory health issues.
- The JMNP2 will also need to consider the relevant policies that are outlined in the Wiltshire Council Core strategy. In particular, this includes:
 - Core Policy 52: Green Infrastructure.
 - Core Policy 55: Air Quality; and
 - Core Policy 60: Sustainable Transport.
 - Due regard is also given to the emerging Wiltshire Local Plan Review, which works to improve air quality by promoting sustainable transport, active transport and general air quality improvements.

Current baseline

According to the Wiltshire Council 2021 Air Quality ASR, there are no AQMAs within the neighbourhood area. However, new development in the neighbourhood area has the potential to indirectly impact on AQMAs within Wiltshire. These AQMAs are located within Salisbury (three in this settlement), Westbury, Calne, Marlborough and Bradford-on-Avon. Although it is expected that most residents in the neighbourhood area will travel to Melksham town centre to access facilities and services, indirect impacts on these AQMAs could be expected due to potential increases in traffic levels between the neighbourhood area and locations like Bradford-on-Avon, Westbury and Devizes.

Air quality monitoring in Wiltshire is undertaken for nitrogen dioxide (NO₂) and fine particulate matter (PM₁₀), the main source for these pollutants is local traffic emissions caused by traffic volume, road layout, topography and high concentrations of pollutants. The annual national objective for both NO₂ and PM₁₀ is 40 ug/m³ maximum. Data from pollutant monitoring undertaken in 2021 demonstrates the average NO₂ and PM₁₀ levels have been decreasing, which is concluded to be due to the COVID-19 pandemic and its associated lockdowns and restrictions. There were three exceedances of the 24 hour mean for PM₁₀ were reported, all in Devizes.

Future baseline

Future development in the neighbourhood area has the potential to increase traffic, congestion, and their associated emissions. In the absence of suitable planning and mitigation, this could lead to a deterioration in air quality. Therefore, mitigation

measures should be incorporated into the design of new development areas to maintain (and where possible, improve) air quality. It is considered that the present shift towards the use of sustainable transportation, including active travel modes and electric vehicle use, has the potential to support longer term air quality improvements. Furthermore, as a response to the COVID-19 pandemic there has been a shift towards employees working from home, which also contributes to emissions reduction. Planning for these factors during development will have a positive impact on air quality.

A.2 Biodiversity and geodiversity

Focus of theme

This chapter presents the policy context and baseline summary in relation to the biodiversity and geodiversity SEA theme. The theme focuses on nature conservation designations, geological sites, and habitats and species in the neighbourhood area. This information is used to identify key issues (both constraints and opportunities) before proposing a relevant SEA objective and supporting assessment questions.

Policy context

Table A2.1 below presents the most relevant documents identified in the policy review for the purposes of the SEA.

Table A2.1: Plans, policies and strategies reviewed in relation to the biodiversity and geodiversity SEA theme.

Document title	Year of publication
Environment Act 2021	2021
National Planning Policy Framework (NPPF)	2021
A Green Future: Our 25 Year Plan to Improve the Environment	2018
UK Post-2010 Biodiversity Framework	2012
The Natural Choice: securing the value of nature (Natural Environment White Paper)	2011
Biodiversity 2020: A strategy for England's wildlife and ecosystem services	2011
Natural Environment and Rural Communities Act	2006
UK Biodiversity Action Plan	1994
Wiltshire Council - Consultation report and next steps	2021
Wiltshire Council - Local Plan Review consultation	2021
Joint Melksham Neighbourhood Plan 2020-2026	2020
Wiltshire Council - Wiltshire Core Strategy	2015
Wiltshire Biodiversity Action Plan	2008

The key messages emerging from the review are summarised below:

- The Environment Act makes provision for biodiversity gain to be a condition of planning permission in England, in addition to creating biodiversity gain site

registers and biodiversity credits. It recognises there is a duty to conserve and enhance biodiversity and encourages the identification of suitable areas through biodiversity reports and local nature recovery strategies. Furthermore, habitat maps are expected to include recovery and enhancement areas which are currently, or could become, important for biodiversity.

- The JMNP2 will need to consider the principles set out in the NPPF, which indicate that planning policies and decisions should protect and enhance soils and sites of biodiversity and / or geological value. Plans should also identify, map, and safeguard components of wider ecological networks, promote positive action for priority habitats and species, and pursue opportunities to secure biodiversity net gains. The NPPF also states that if development causes substantial harm and cannot be avoided, adequately mitigated, or compensated, then planning permission should be refused.
- The NPPF also supports the establishment and enhancement of habitat networks and green infrastructure to allow for more resilience to current and future pressures for biodiversity.
- The 25 Year Environment Plan places importance on improvements to the natural environment, such as achieving clean air and water, reducing environmental hazard risk, and encouraging sustainable resource use. This will be accomplished through a variety of actions including implementing sustainable land management, engaging in nature recovery, and connecting people to the environment.
- The UK Biodiversity Action Plan (BAP) is a response to the Convention on Biological Diversity, which calls for the development and enforcement of national strategies and associated action plans to identify, conserve and protect existing biological diversity, and to enhance it wherever possible. In particular, the BAP identifies priority species and habitats that are most threatened and require conservation action. The UK BAP is succeeded by the UK Post-2010 Biodiversity Framework, which aims to ensure that biodiversity is valued, conserved, restored, and wisely used, and ecosystem services are maintained. This helps to sustain a healthy planet that delivers essential benefits for everyone.
- The Natural Environment White Paper (NEWP) sets out the importance of a healthy, functioning natural environment to sustaining economic growth, prospering communities, and personal wellbeing. It adopts a landscape approach to protect and enhance biodiversity and aims to create a green economy, whereby the economic growth and the health of natural resources sustain each other.
- Reflecting the commitments within the NEWP, Biodiversity 2020: A strategy for England's wildlife and ecosystem services aims to stop overall biodiversity loss, support healthy and well-functioning ecosystems, and establish coherent ecological networks.
- The Natural Environment and Rural Communities Act details nature protection in the UK, which includes wildlife, Sites of Special Scientific Interest (SSSIs), and National Parks. It extends the UK Government's duty to biodiversity and establishes the role of Natural England, which is responsible for safeguarding England's natural environment, making sure it is protected and improved whilst ensuring people enjoy, understand, and access it.

- The Wiltshire Biodiversity Action Plan contains habitat action plans for the variety of habitats found across the area. It sets out the following priorities for the area:
 - To prioritise action required to conserve Wiltshire’s biodiversity.
 - To provide baseline information on our current knowledge.
 - To coordinate and focus action for biodiversity by creating a cohesive local partnership.
 - To raise awareness among all sectors in Wiltshire – conservation, public, private, local communities.
 - To provide a framework for monitoring; and
 - To identify current issues and set out targets to work towards.
- The JMNP2 will also need to consider the relevant policies that are outlined in the Wiltshire Council Core Strategy. In particular, this includes:
 - Core Policy 50: Biodiversity and Geodiversity; and
 - Core Policy 52: Green Infrastructure.
- Due regard is also given to the emerging Wiltshire Local Plan Review, which works to enhance biodiversity and geodiversity by enhancing blue and green infrastructure and biodiversity itself.

Current baseline

Sites of Special Scientific Interest

Sites of Special Scientific Interest (SSSI) are protected to conserve their wildlife and / or geological value. Within the neighbourhood area there is one SSSI which partly overlaps with the neighbourhood area, with two additional SSSIs located within proximity to the boundary to the south of the neighbourhood area. The location of these designations is shown in **Figure A2.1** at the end of this chapter. Further information is provided below:

- Part of the Spye Park SSSI overlaps with the neighbourhood area to north-east within Upper Selves Wood and Lower Selves Wood. Covering a total area of 89.64 ha, it is designated for its extensive habitat mosaic and geology that creates a rich habitat for epiphytic lichens, breeding woodland birds and diverse insect communities. According to the latest condition survey, this SSSI was 100% in unfavourable-recovering condition²⁵.
- Seend Cleeve Quarry SSSI is within 1 km of the neighbourhood area boundary to the south. Covering a total 3.05 ha, it is designated for its geology, which is an example of the Oxfordian Stage, and provides information on the Jurassic System. According to the latest condition survey, this SSSI was 100% in unfavourable-declining condition²⁶.
- Seend Ironstone Quarry and Road Cutting SSSI is approximately 1.2 km south of the neighbourhood area. Covering a total of 2.3 ha, it is designated for its Lower Greensand geology and diverse fauna communities. According to the latest condition survey, this SSSI was 100% in favourable condition²⁷.

²⁵ Natural England (no date) 'Spye Park SSSI' can be accessed [here](#).

²⁶ Natural England (no date) 'Seend Cleeve Quarry SSSI' can be accessed [here](#).

²⁷ Natural England (no date) 'Seend Ironstone Quarry and Road Cutting SSSI' can be accessed [here](#).

SSSI Impact Risk Zones (IRZ) are a GIS tool/dataset that map zones around each SSSI according to their sensitivities. They specify the types of development that have the potential to have adverse impacts at a given location, and thresholds of development which indicate a need to consult Natural England. In this respect, the north-east corner of the neighbourhood area (to the east of Hanging Wood, Frogditch Farm and Selves Farm) is likely to overlap with IRZs typical of the kind of development the neighbourhood plan may potentially bring forward (residential development of 100 units or more, and any residential development of 50 or more houses outside existing settlements / urban areas). In this respect, consultation with Natural England may be required for any applications that come forward in these locations.

Locally important sites

The Melksham Neighbourhood Plan Green Infrastructure Evidence Base Report²⁸ identifies 14 local wildlife sites within the neighbourhood area, which includes areas of ancient woodland, as well as the River Avon and the Kennet and Avon Canal. Of note is Conigre Mead Nature Reserve, which was bought by local people and given as a nature reserve to Wiltshire Wildlife Trust in 1989. It is now a valuable habitat for a variety of wildlife, including wild meadow plant species, insects, birds and small mammals (woodmice and bats). These wildlife sites are shown in **Figure A2.2** overleaf.

²⁸ Joint Melksham Neighbourhood Plan (2021) 'Green Infrastructure Evidence Base Report' can be accessed [here](#).

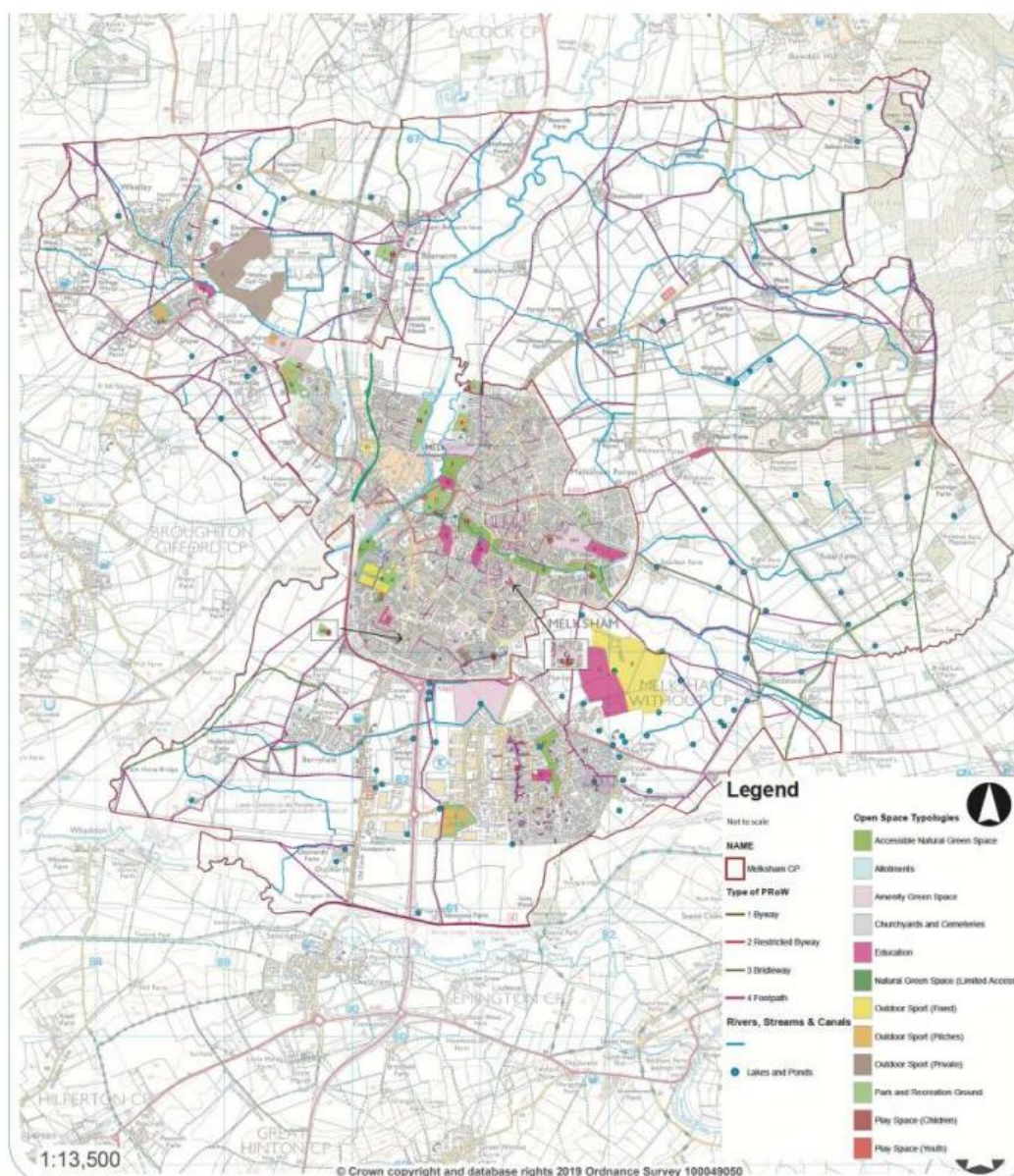


Figure A2.2: Green infrastructure assets and priorities (taken from the Melksham Neighbourhood Plan Green Infrastructure Evidence Base Report)

Priority habitats and species

There are a variety of Biodiversity Action Plan (BAP) Priority habitats within and in proximity to the neighbourhood area. This includes ancient woodland, deciduous woodland, traditional orchards, wood pasture and parkland, lowland fens, and good quality semi-improved grassland. The location of the habitats is shown in **Figure A2.3** at the end of this chapter.

Ancient woodland takes hundreds of years to establish. It is considered important for its wildlife (often including rare and threatened species), and soils. Ancient woodland includes land that has been wooded continuously since at least 1600 AD. This means the following is included under its designation:

- Ancient semi-natural woodland mainly made up of trees and shrubs native to the site, usually arising from natural regeneration; and

- Plantations on ancient woodland sites - replanted with conifer and broadleaved trees that retain ancient woodland features, such as undisturbed soil, ground flora and fungi²⁹.

Within the neighbourhood area there are five areas of ancient woodland - Daniel's Wood to the north-west of Beanacre, Upper Selves Wood and Lower Selves Wood to the north-east, Hanging Wood north of the A3102 Sandridge Hill and Morass Wood south of Sandridge Tower.

The national habitat network is a set of maps that work to help identify areas for future habitat creation and restoration at a landscape scale³⁰. In terms of the national habitat network, there are areas of Network Enhancement Zone 1 to the south of Shaw, to the north of Beanacre and in the north-east corner. Network Enhancement Zone 1 is deemed most suitable for habitat re-creation supporting the primary habitat. Additionally, there are areas of Network Enhancement Zone 2 running through Melksham and to the east of the neighbourhood area – Network Enhancement Zone 2 is most suitable for new habitats and green infrastructure. There is also a large area of Network Expansion Zone to the north – this is identified as a suitable location for connecting and linking up habitats across a landscape through new habitat creation.

The Wiltshire and Swindon Biological Records Centre (WSBRC)³¹ will contain archives of protected and notable species within Wiltshire and Swindon, including those species protected by the Wildlife and Countryside Act 1981³² and under Section 41 of the Natural Environment and Rural Communities Act 2006. The BAP Priority Habitats and ecological designations within and surrounding the neighbourhood area are likely to support populations of protected species.

Future baseline

Habitats and species will potentially face increasing pressures from future development within the neighbourhood area, with the potential for negative impacts on the wider ecological network. This may include a loss of habitats and impacts on biodiversity networks, which may be exacerbated by the effects of climate change. This has the potential to lead to changes in the distribution and abundance of species and changes to the composition of habitats.

The neighbourhood area presents an opportunity to maximise benefits for biodiversity by including consideration of important habitats, species, and designated sites at an early stage of planning for future growth. To maintain and improve the condition of biodiversity in the future, it will be important to not only protect and enhance important habitats, but also the connections between them. It will be crucial to effectively coordinate the delivery of new development to ensure that opportunities to improve green infrastructure and ecological corridors are maximised within the neighbourhood area.

²⁹ GOV.UK (2022) 'Ancient woodland, ancient trees and veteran trees: advice for making planning decisions' can be accessed [here](#).

³⁰ Natural England (2020) 'National Habitat Network Maps' can be accessed [here](#).

³¹ The Wiltshire and Swindon Biological Records Centre (WSBRC) website can be accessed [here](#).

³² UK Government (1981) 'The Wildlife and Countryside Act 1981' can be accessed [here](#).

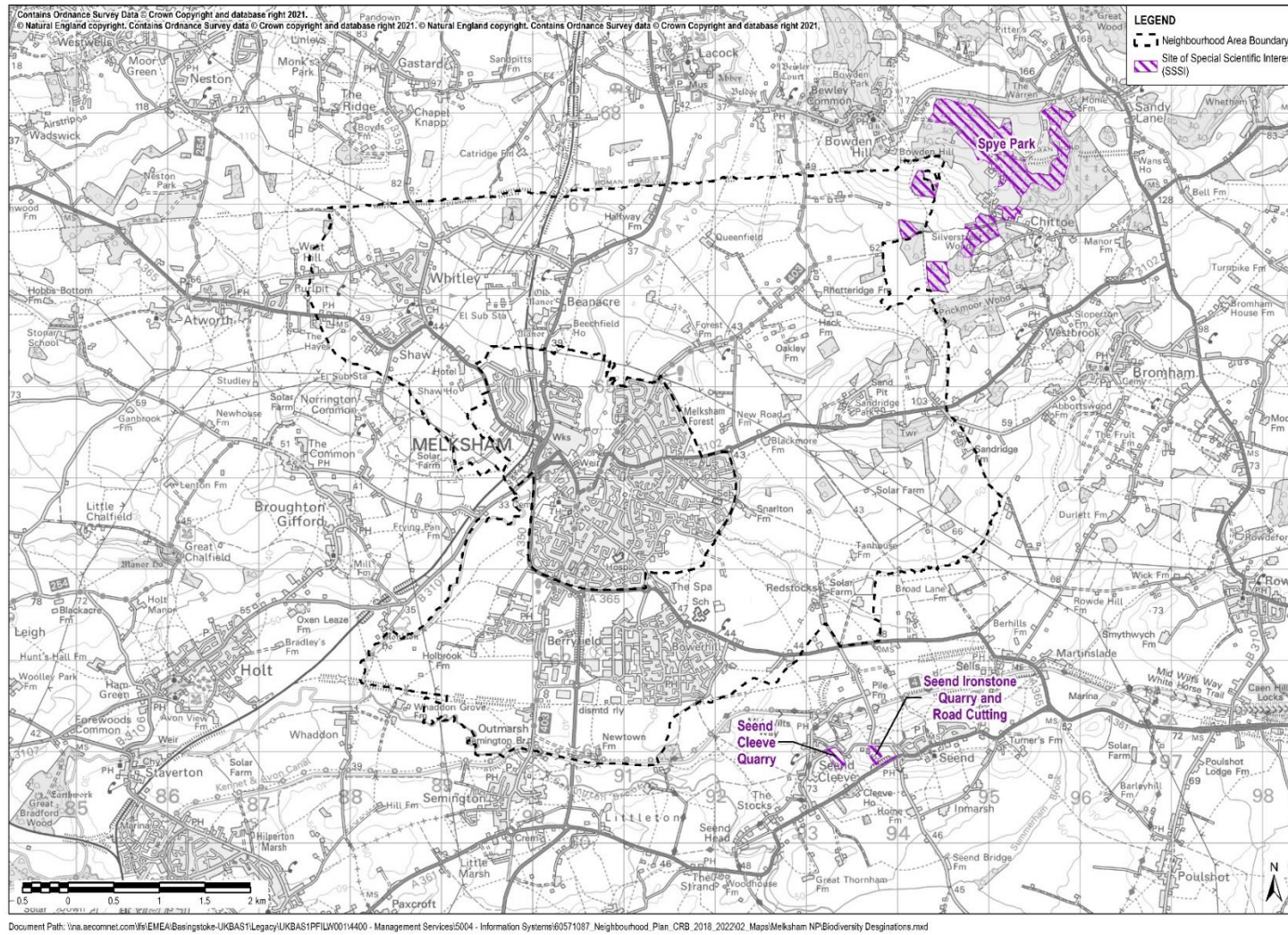


Figure A2.1: Biodiversity designations within the neighbourhood area

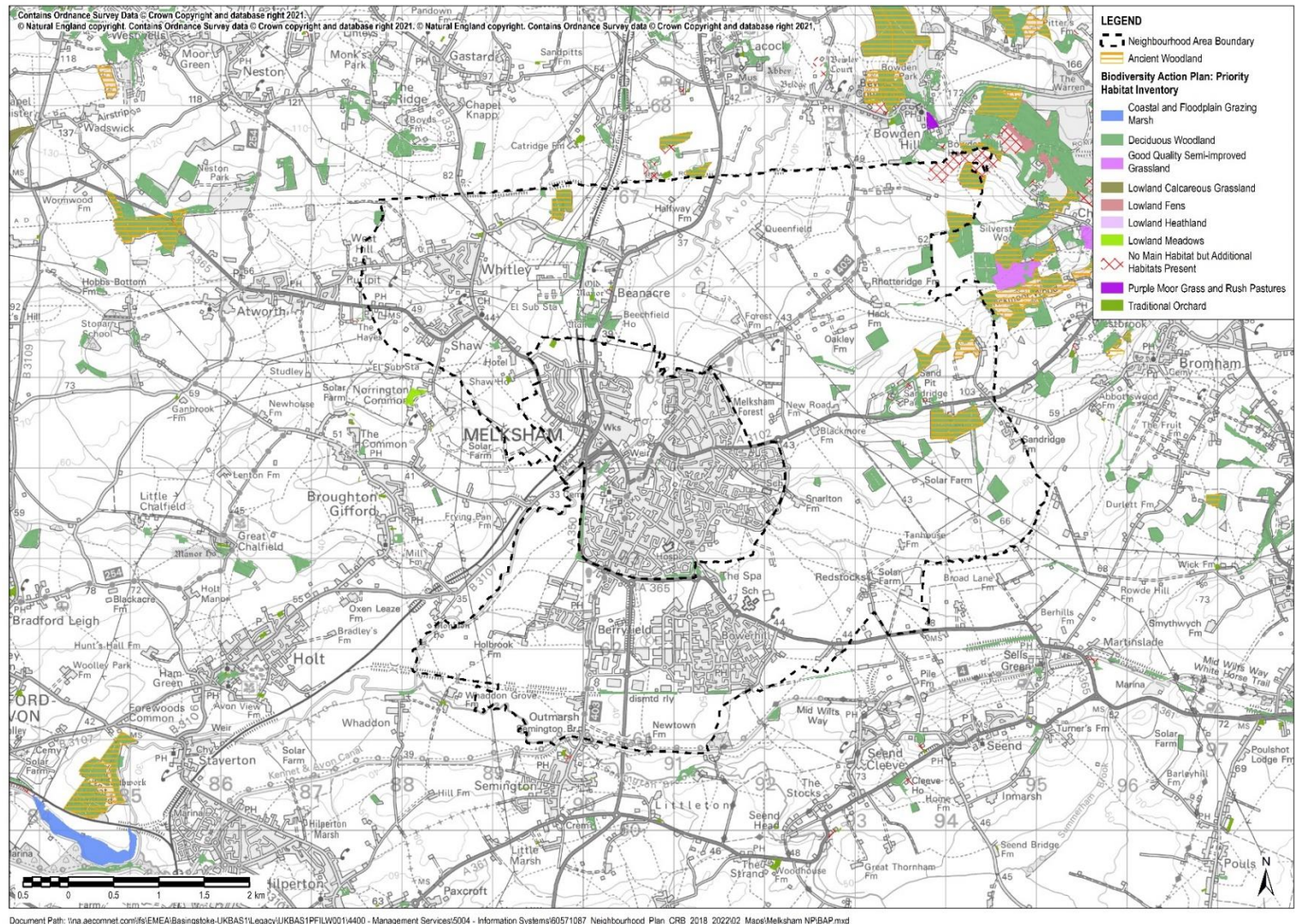


Figure A2.3: BAP Priority Habitats within the neighbourhood area

A.3 Climate change

Focus of theme

This chapter presents the policy context and baseline summary in relation to the climate change SEA theme. The theme focuses on contributions to climate change, the effects of climate change, climate change adaptation, and flood risk in the neighbourhood area. This information is used to identify key issues (both constraints and opportunities) before proposing a relevant SEA objective and supporting assessment questions.

Policy context

Table A3.1 below presents the most relevant documents identified in the policy review for the purposes of the SEA.

Table A3.1: Plans, policies and strategies reviewed in relation to the climate change SEA theme

Document title	Year of publication
National Planning Policy Framework (NPPF)	2021
Net Zero Strategy: Build Back Greener	2021
National Infrastructure Assessment	2021
The UK Sixth Carbon Budget	2020
The Clean Air Strategy 2019	2019
The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting	2018
A Green Future: Our 25 Year Plan to Improve the Environment	2018
The Clean Growth Strategy	2017
UK Climate Change Risk Assessment 2017	2017
Flood and Water Management Act 2010	2010
Climate Change Act 2008	2008
Anthesis Reports - Wiltshire Council (downloadable from here)	2022
Wiltshire Climate Strategy 2022-2027	2022
Wiltshire Council - Consultation report and next steps	2021
Wiltshire Council - Local Plan Review consultation	2021
Joint Melksham Neighbourhood Plan 2020-2026	2020
JBA Consulting - Wiltshire Council Level 1 Strategic Flood Risk Assessment	2019
Wiltshire Council - Wiltshire Core Strategy	2015

The key messages emerging from the review are summarised below:

- The JMNP2 will need to consider the principles set out in the NPPF, including adopting a proactive planning approach to both mitigate and adapt to climate change. Planning policies are expected to improve the resilience of communities and infrastructure to climate change impacts, avoid inappropriate development in

the flood plain zone, and support the move to a low carbon economy. The NPPF recognises the potential for planning to shape places to better contribute to reductions in greenhouse gas emissions and deliver long-term resilience.

- The Clean Growth Strategy, Clean Air Strategy and the Net Zero Strategy are a collection of documents seeking to progress the government's commitment to becoming net zero by 2050 under the UK Climate Change Act 2008. The documents outline how the government will tackle air pollution sources whilst maintaining an affordable energy supply and increasing economic growth. This parallels with the 25 Year Environment Plan, which seeks to manage land resources sustainably, recover and reinstate nature, protect soils and habitats, increase resource efficiency, improve water quality, and connect people with the environment. Of note in the 25 Year Environment Plan are the following: 'Chapter 1: Using and managing land sustainably', 'Chapter 6: Protecting and improving the global environment', 'Goal 4: A reduced risk of harm from environmental hazards such as flooding and drought' and 'Goal 7: Mitigating and adapting to climate change'.
- The National Infrastructure Assessment is published every five years and analyses the UK's long-term economic infrastructure needs to create a strategic vision and recommendations. The baseline report states that climate change will increase pressures on all sectors, including economic infrastructure.
- The National Adaptation Programme outlines the government's response to the second Climate Change Risk Assessment, demonstrating the actions the government is currently taking and actions it will be taking in the future. It outlines risks that fit within the priority areas identified by the UK Climate Change Risk Assessment 2017:
 - Flooding and coastal change risks to communities, businesses, and infrastructure.
 - Risks to health, well-being, and productivity from high temperatures.
 - Risk of shortages in the public water supply, and for agriculture, energy generation, and industry.
 - Risks to natural capital, including terrestrial, coastal, marine and freshwater ecosystems, soils, and biodiversity.
 - Risks to domestic and international food production and trade; and
 - New and emerging pests and diseases, and invasive non-native species, affecting people, plants, and animals.
- The Flood and Water Management Act 2010 provides for better and more comprehensive management of flood risk for people, homes, and businesses, in addition to aiding in safeguarding community groups from unaffordable rises in surface water drainage charges and protecting consumer water supplies. It also highlights alternatives to traditional engineering to flood risk management.
- The UK Climate Change Act 2008 establishes a framework to develop an economically viable emissions reduction path. The Climate Change Act 2008 (2050 Target Amendment) Order of 2019 put in place the legally

binding target of achieving net-zero emissions by 2050. The Climate Change Act includes the following:

- The UK Government must reduce greenhouse gas emissions by a minimum of 100% of 1990 levels by 2050.
 - The document requires the government to produce legally binding carbon budgets – a cap on the amount of greenhouse gases emitted in the UK over a five-year period.
 - The Act requires the government to assess and prepare for the risks and opportunities linked to climate change for the UK.
- The Sixth Carbon Budget is the legal limit of UK net greenhouse gas emissions and requires the country to reduce emissions by 78% by 2035 relative to 1990 levels. This puts the country on track to achieve net-zero emissions by 2050 at the latest.
 - Wiltshire Council declared a climate emergency in February 2019³³; since this declaration, the council has sought to make the county of Wiltshire carbon neutral by 2030. A Global Warming and Climate Emergency Task Group was set up for gather evidence and suggest recommendations on achieving net zero. An update on the current situation in July 2021³⁴ reinstated the following priorities:
 - Growing the economy.
 - Strong communities.
 - Protecting the vulnerable; and
 - Working with partners.
 - Wiltshire Council have commissioned an independent consultant to provide a technical study of the area's climate ambitions in order to clearly see a way forward and to visualise progress. The Anthesis reports set out a plan for climate action across six areas:
 - Buildings
 - Improving energy efficiency.
 - Reducing gas heating systems; and
 - Low carbon and energy efficient cooking, lighting and appliances.
 - Transport
 - Travelling shorter distances.
 - Driving less.
 - Switching to electric vehicles; and
 - Improving freight emissions
 - Waste
 - Reducing the quantity of waste; and
 - Increasing the recycling rate.

³³ Wiltshire Council (2022) 'Climate emergency' can be accessed [here](#).

³⁴ Wiltshire Council (2021) 'Update on Council's response to the climate emergency' can be accessed [here](#).

- Industry
 - Shifting away from fossil fuels; and
- More efficient processes
- Natural environment
 - Increased tree coverage and tree planting.
- Land use management; and
- Livestock management.
- Energy supply
 - Increase solar photovoltaic (PV) capacity; and
 - Increase the capacity of other renewable technologies.

The reports also undertake an emissions analysis and recommend how changes to the carbon footprint can be achieved through a variety of activities, like decarbonisation efforts.

- The Wiltshire Climate Strategy builds on the current evidence base to outline how Wiltshire can reduce its impact on climate change and become climate neutral by 2030. The strategy is split into eight different sections:
 - Transport.
 - Homes and the Built Environment.
 - Natural environment, food and farming.
 - Energy.
 - Green economy.
 - Resources and waste.
 - Carbon neutral council; and
 - Strategies and targets timeline.

The strategy ensures the transition to a low carbon, climate resilient future is accessible and manageable for all, using the most up-to-date evidence to deliver benefits to the area.

- The Wiltshire Council Level 1 Strategic Flood Risk Assessment (SFRA) forms part of a comprehensive and robust evidence base for the Local Plan Review, which will set out a vision and framework for development in Wiltshire up to 2036. The SFRA will also be used to assess planning applications, and flood risk mapping information will be made available for developers for carrying out flood risk assessments.
- The Wiltshire Local Flood Risk Management Strategy has an overarching vision of ‘working together to manage local flood risk in Wiltshire.’ Several strategic measures are identified to address the following five objectives:
 - Improve knowledge regarding flood risk.
 - Improve protection from flooding.
 - Improve resilience to flooding.
 - Improve the environment; and

- Improve communications and flooding issues.
- The JMNP2 will also need to consider the relevant policies that are outlined in the Wiltshire Council Core Strategy. In particular, this includes:
 - Core Policy 41: Sustainable construction and Low Carbon Energy.
 - Core Policy 42: Standalone Renewable Energy Installations.
 - Core Policy 52: Green Infrastructure.
 - Core Policy 60: Sustainable Transport.
 - Core Policy 67: Flood Risk; and
 - Core Policy 68: Water Resources.
- Due regard is also given to the emerging Wiltshire Local Plan Review, which works to combat climate change by:
 - Tackling flood risk and promoting sustainable water management; and
 - Delivering sustainable design and construction methods in the built environment.

Current baseline

Contribution to climate change

The Climate Change Act 2008 (2050 Target Amendment) Order of 2019 requires carbon dioxide (CO₂) emissions from the built environment to be monitored and recorded at the local authority level. The CO₂ emissions shown in **Figure A3.1** and **Figure A3.2** below are derived from data supplied by the Department for Business, Energy, and Industrial Strategy³⁵.

As demonstrated by **Figure A3.1** overleaf, the largest contributing sector with regards to CO₂ emissions in Wiltshire was the industry and commercial sector until 2011, where the transportation sector contributed more and has continued to do so. The transport sector has been decreasing in terms of CO₂ emissions since 2017 but still remains the biggest emissions contributor in Wiltshire.

The introduction and uptake of Ultra Low Emission Vehicles (ULEVs) will contribute positively towards the reduction of road transport related emissions. In line with assumptions made by the Department for Transport's 'Road to Zero' report (2018)³⁶, it is assumed that ULEV uptake will increase rapidly in the coming decade. Therefore, all vehicles could be ultra-low emission (powered either by hydrogen or electricity) by 2030, thus the CO₂ emissions from the transport sector have the potential to decrease.

³⁵ Department for Business, Energy and Industrial Strategy (2020) 'UK local authority and regional carbon dioxide emissions national statistics: 2005-2008' can be accessed [here](#). The data tables used to generate Figures 4.1 and 4.2 can be downloaded from this page.

³⁶ Department for Transport (2018) 'The Road to Zero' can be accessed [here](#).

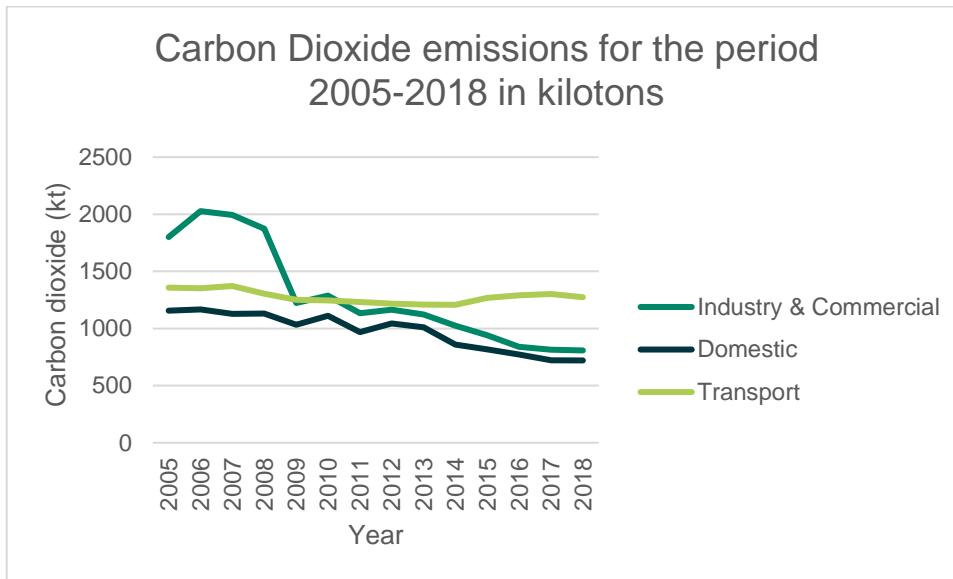


Figure A3.1: CO2 emissions in kilotons per year for each sector in Wiltshire (2005-2018)

Figure A3.2 below indicates that CO₂ emissions per capita have been higher in Wiltshire than the average for South West England and the whole of England between 2005-2018. Wiltshire has experienced the greatest decrease in per capita emissions over the examined period; a decrease of 4.1 tons per capita. This is in comparison to an average of 3.2 tons per capita in South West England and 3.5 tons per capita for England.

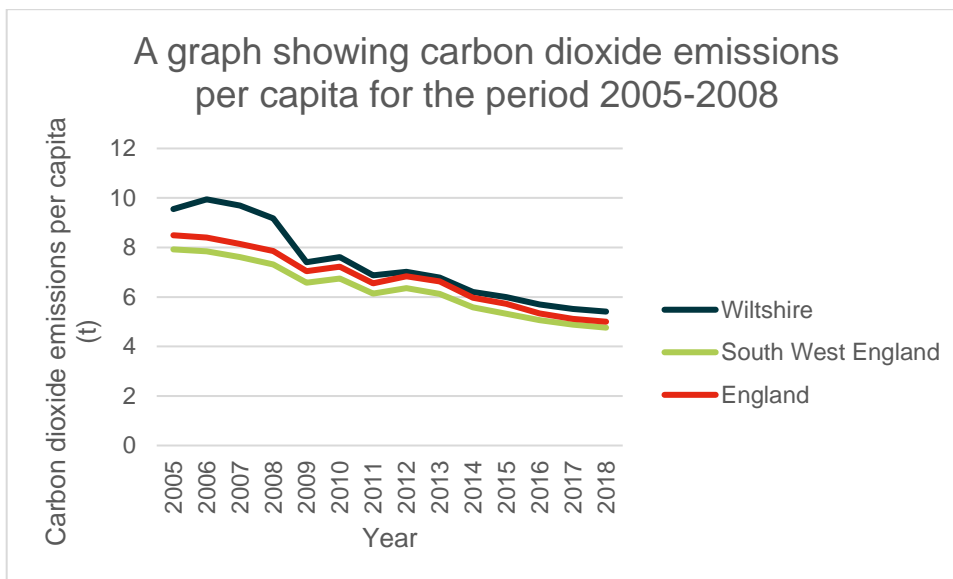


Figure A3.2: CO2 emissions per capita (in tons) for Wiltshire, the South West England region and the whole of England (2005-2018)

Potential effects of climate change

The UK Climate Projections (UKCP18) programme is a climate analysis tool that provides the most up-to-date assessment on potential future climatic changes in the UK based on climate model simulations³⁷. Projections can be downscaled to a regional level across the UK, allowing for specific evaluations of a selected area.

³⁷ Met Office (no date) 'UK Climate Projections (UKCP)' can be accessed [here](#).

The UKCP18 projections conclude the effects of climate change for the South West, under the high emissions “worst case” scenario RCP8.5³⁸, are likely to be as follows (as compared to 1981-2000):

- 2021-2040:
 - An average 1.18 °C increase in mean winter temperatures.
 - An average 2.11 °C increase in mean summer temperatures.
 - An average 0.21 mm increase in mean winter precipitation rate; and
 - An average 0.35 mm decrease in mean summer precipitation rate.
- 2061-2080:
 - An average 2.95 °C increase in mean winter temperatures.
 - An average 5.07 °C increase in mean summer temperatures.
 - An average 0.86 mm increase in mean winter precipitation rate; and
 - An average 0.86 mm decrease in mean summer precipitation rate.

If these changes were to occur, the neighbourhood area would likely face a range of risks, including:

- Increases in cases of heat related illnesses and deaths during the summer period as well as illnesses and deaths related to exposure to sunlight.
- An increase in the risk of injuries and deaths caused by storm events, due to both the increase in quantity and magnitude.
- Changes to water resources, in terms of quality and quantity.
- An increased risk of flooding, including changes in vulnerability to 1 in 100-year floods, and a need to upgrade flood defences.
- Soil erosion due to flash flooding.
- Loss of species that are at the edge of their distribution, particularly their southern edge, and a spread of species at the northern edge of their distribution.
- Increased drought events, both in quantity and magnitude; and
- Heat related impacts to local infrastructure, e.g., road surfaces melting.

Flood risks

Figure A3.3³⁹ overleaf indicates the areas within Flood Zones 2 and 3 within the neighbourhood area. The figure indicates that Whitley, Shaw, Melksham Town, Bowerhill and Beanacre are distinct communities within the neighbourhood area with differing flood risks due to the presence of the River Avon, its floodplains and its tributaries. A section of the A350 Western Way is also within Flood Zone 2 and 3 within Melksham and is in proximity to these flood zones to the north.

³⁸ The RCP 8.5 emissions scenario assumes there is a fast population growth (doubling the planet's population to reach 12 billion), the lowest rate of technological development, slow GDP growth, a massive increase in world poverty and high energy use and emissions. It is seen to be the 'worst case scenario' in which no climate change mitigation or adaptation techniques are engaged with.

³⁹ GOV.UK (2021) 'Get flood risk information for planning in England' can be accessed [here](#).

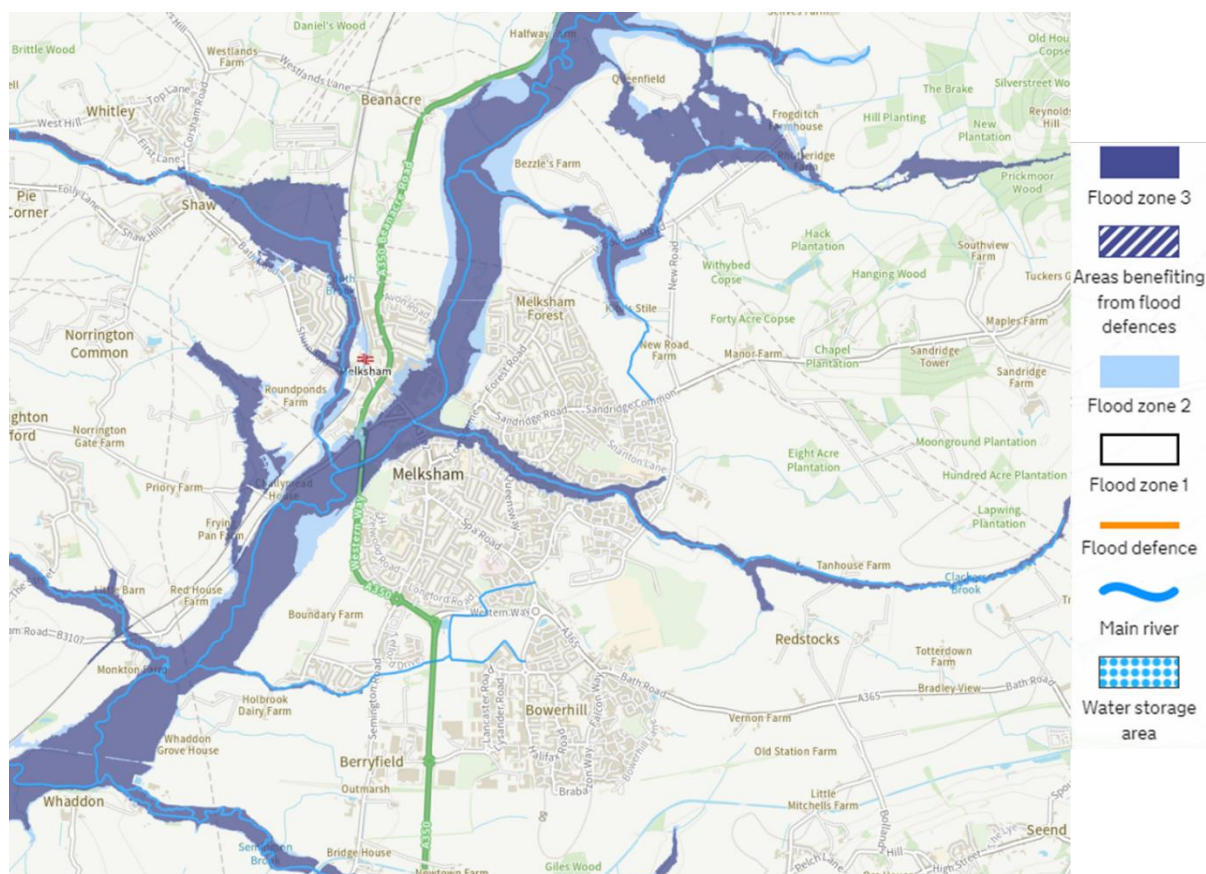


Figure A3.3: Fluvial flood risks within the neighbourhood area

Figure A3.4⁴⁰ overleaf demonstrates that similar areas are at risk of surface water flooding. In particular, Melksham, Shaw and Whitley are at medium and high risk of surface water flooding - with houses in these settlements being subjected to internal flooding within properties due to surface water (this has occurred multiple times over the last decade). This may be due to drains in streets and paved areas becoming clogged or reaching capacity during heavy rainfall events. Additionally, the area around Woodrow Road in the north of the neighbourhood area is also at high and medium risk of surface water flooding.

⁴⁰ GOV.UK (2019) 'Learn more about flood risk' can be accessed [here](#).



Figure A3.4: Surface water flood risks within the neighbourhood area

Future baseline

Climate change has the potential to increase the occurrence of extreme weather events in the neighbourhood area. In turn it is likely the neighbourhood area will experience an amplified level of risk associated with climate change and a subsequent increase in need for resilience and adaptation measures. New development has the potential to increase flood risk through changing surface and ground water flows, overloading existing inputs to the drainage and wastewater networks, and / or increasing the number of residents exposed to areas of existing flood risk.

In terms of climate change contribution, greenhouse gas emissions generated in the neighbourhood area may continue to decrease with the wider adoption of energy efficiency measures, renewable energy production, and new technologies. However, increases in the built footprint of the neighbourhood area would likely contribute to increases in the absolute levels of greenhouse gas emissions, and these increases are considered likely with or without the JMNP2.

A.4 Community wellbeing

Focus of theme

This chapter presents the policy context and baseline summary in relation to the community wellbeing SEA theme. The theme focuses on population and age structure, deprivation levels, housing mix and affordability, community assets and infrastructure, and influences on health and wellbeing for residents in the neighbourhood area. This information is used to identify key issues (both constraints and opportunities) before proposing a relevant SEA objective and supporting assessment questions.

Policy context

Table A4.1 below presents the most relevant documents identified in the policy review for the purposes of the SEA.

Table A4.1: Plans, policies and strategies reviewed in relation to the community wellbeing SEA theme.

Document title	Year of publication
National Planning Policy Framework (NPPF)	2021
Health Equity in England: The Marmot Review 10 Years On	2020
Healthy and Safe Communities Planning practice guidance	2019
Planning for Sport Guidance	2019
A Green Future: Our 25 Year Plan to Improve the Environment	2018
Wiltshire Council - Consultation report and next steps	2021
Wiltshire Council - Local Plan Review consultation	2021
Joint Melksham Neighbourhood Plan 2020-2026	2020
Wiltshire's Joint Health and Wellbeing Strategy	2019
Wiltshire Council - Wiltshire Core Strategy	2015

The key messages emerging from the review are summarised below:

- The JMNP2 will need to consider the principles outlined in the NPPF, which seek to retain and enhance access to community services and facilities. The NPPF recognises the benefits of having a range of local provision to support community needs. In addition, the NPPF recognises the benefits of creating cohesive communities in safe environments where the fear of crime (and crime itself) does not undermine resident quality of life.
- The NPPF recognises the role of development plans in helping to deliver access to high quality open spaces and opportunities for sport and physical activity, therefore contributing to the health and wellbeing of communities. The health benefits of access to nature, green spaces and green infrastructure are further reiterated in the 25 Year Environment Plan. Additional guidance is available through the Healthy and Safe Communities Planning practice guidance.
- The 2020 Health Equity in England Report identifies a health gap between less and more deprived areas, which has grown in the last decade. This

means an increased amount of people can expect to spend more of their lives in poor health with a stalled, or even declining, life expectancy.

- The Planning for Sport Guidance seeks to help the planning system provide formal and informal opportunities for everyone to take part in sport and be physically active, setting out twelve principles.
- Wiltshire's Joint Health and Wellbeing Strategy is a shared strategy which aims to improve the health and wellbeing of the local population, reduce inequalities, and promote the integration of services. The strategy has been developed based upon the evidence of need identified within The Wiltshire Health and Wellbeing Joint Strategic Needs Assessment (JSNA) which provides a summary of the current and future health and wellbeing needs of the people in Wiltshire.
- The JMNP2 will also need to consider the relevant policies that are outlined in the Wiltshire Council Core Strategy. In particular, this includes:
 - Core Policy 1: Settlement Strategy.
 - Core Policy 3: Infrastructure Requirements.
 - Core Policy 34: Additional Employment Land.
 - Core Policy 35: Existing Employment Land.
 - Core Policy 36: Economic Regeneration.
 - Core Policy 38: Retail and Leisure.
 - Core Policy 39: Tourism Development.
 - Core Policy 43: Providing Affordable Homes.
 - Core Policy 44: Rural Exception Sites.
 - Core Policy 45: Meeting Wiltshire's Housing Needs.
 - Core Policy 46: Meeting the Needs of Wiltshire's Vulnerable and Older People.
 - Core Policy 47: Meeting the Needs of Gypsies and Travellers.
 - Core Policy 48: Supporting Rural Life.
 - Core Policy 49: Protection of Rural Services and Community Facilities.
 - Core Policy 51: Landscape.
 - Core Policy 52: Green Infrastructure.
 - Core Policy 55: Air Quality.
 - Core Policy 60: Sustainable Transport.
 - Core Policy 66: Strategic Transport Network; and
 - Core Policy 68: Water Resources.
- Due regard is also given to the emerging Wiltshire Local Plan Review, which works to enhance community wellbeing by:
 - Enhancing blue/green infrastructure and biodiversity; and
 - Promoting sustainable transport, active travel and improving air quality.

Current baseline

Population and age structure

The JMPN2 area includes two parishes – Melksham Town and Melksham Without. A significant proportion of the population is located within Melksham Town and settlements surrounding Melksham Town, including Whitley, Shaw, Bowerhill and Beanacre.

According to the City Population website, which uses the 2011 Census data, the data for Melksham⁴¹ indicates the area had a total of 15,229 residents in 2011; this is estimated to have increased to 16,416 in 2020. The estimated population for Melksham Town in 2020, categorised by age group, is shown by **Figure A4.1** below.

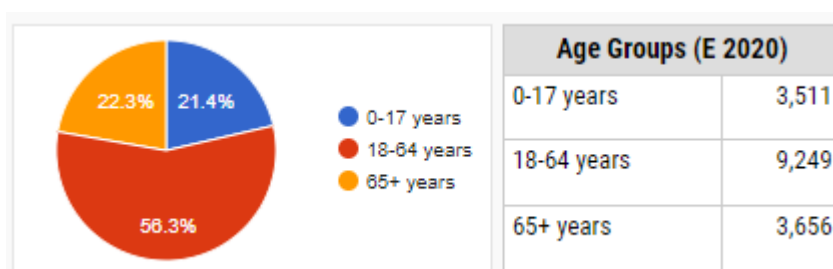


Figure A4.1: Age groups in Melksham⁴²

The data for Melksham Without⁴³ indicates the area had a total 6,678 residents in 2011; this is estimated to have increased to 7,701 in 2020. The estimated population for Melksham Without in 2020, categorised by age group, is shown by **Figure A4.2** below.

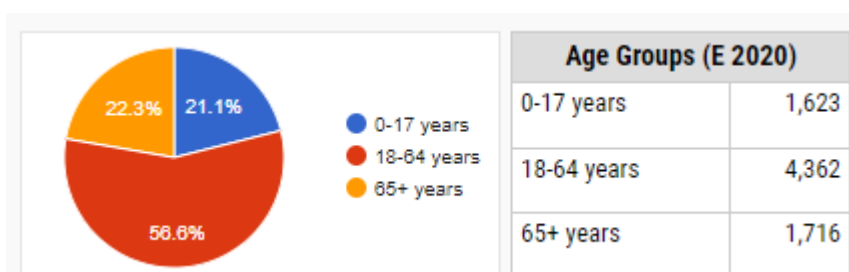


Figure A4.2: Age groups in Melksham Without⁴⁴

Index of Multiple Deprivation

The Index of Multiple Deprivation 2019 (IMD) is an overall relative measure of deprivation and is the combination of seven different domains as described below:

- **Income:** the proportion of the population experiencing a deprivation relating to low income. There are a further two subsets of this measure:
 - **Income deprivation affecting children:** the proportion of children aged 0-15 living in income deprived families; and
 - **Income deprivation affecting older people:** the proportion of all adults aged 60 and above that experience income deprivation.

⁴¹ City Population (2021) 'Melksham' can be accessed [here](#).

⁴² Ibid.

⁴³ City Population (2021) 'Melksham Without' can be accessed [here](#).

⁴⁴ Ibid.

- **Employment:** the proportion of the working-age population involuntarily excluded from the labour market, including those who want to work but cannot.
- **Education, skills, and training:** the lack of attainment and skills in the population.
- **Health deprivation and disability:** the risk of premature death and the impairment of quality of life through poor physical or mental health.
- **Crime:** the risk of personal and material victimisation at the local level.
- **Barriers to housing and services:** the physical and financial accessibility of housing and local services, split into ‘geographical barriers’ linked to physical proximity and ‘wider barriers’ linked to access to housing.
- **Living environment:** the quality of the local environment, categorised into ‘indoors living environment’ to measure the quality of housing and ‘outdoors living environment’ to measure indicators like air quality and road traffic accidents.

Lower super output areas (LSOAs)⁴⁵ are designed to improve the reporting of small area statistics in England and Wales. They are standardised geographies intended to be as consistent as possible, with each LSOA containing approximately 1,000 to 1,500 people. In relation to the IMD 2019, LSOAs are ranked out of the 32,844 in England and Wales, with 1 being the most deprived.

In this respect, the neighbourhood area overlaps with 14 LSOAs. **Table A4.2** below indicates which deprivation domain is more prevalent across the LSOAs overlapping the neighbourhood area. Reflecting on this information, clearly ‘barriers to housing and services’ and ‘education, skills and training’ are the main deprivation issues in the area.

Table A4.2: IMD rankings for the neighbourhood area

LSOA	Most deprived deprivation domain
Wiltshire 020A	Barriers to Housing and Services – 3,403 (amongst 20% most deprived neighbourhoods)
Wiltshire 020B	Education, Skills and Training – 767 (amongst 10% most deprived neighbourhoods)
Wiltshire 020C	Education, Skills and Training – 7,513 (amongst 30% most deprived neighbourhoods)
Wiltshire 020D	Education, Skills and Training – 7,000 (amongst 30% most deprived neighbourhoods)
Wiltshire 020E	Education, Skills and Training – 13,324 (amongst 50% most deprived neighbourhoods)
Wiltshire 021B	Barriers to Housing and Services - 12,484 (amongst 40% most deprived neighbourhoods)

⁴⁵ The Indices of Deprivation Explorer can be accessed [here](#).

LSOA	Most deprived deprivation domain
Wiltshire 021D	Barriers to Housing and Services – 5,037 (amongst 20% most deprived neighbourhoods)
Wiltshire 021E	Barriers to Housing and Services – 5,694 (amongst 20% most deprived neighbourhoods)
Wiltshire 021F	Barriers to Housing and Services – 15,679 (amongst 50% most deprived neighbourhoods)
Wiltshire 022A	Education, Skills and Training – 2,272 (amongst 10% most deprived neighbourhoods)
Wiltshire 022B	Education, Skills and Training – 5,550 (amongst 20% most deprived neighbourhoods)
Wiltshire 022C	Crime – 11,638 (amongst 40% most deprived neighbourhoods)
Wiltshire 022D	Employment – 11,123 (amongst 40% most deprived neighbourhoods)
Wiltshire 022E	Education, Skills and Training – 12,525 (amongst 40% most deprived neighbourhoods)

Housing tenure

As reported by Zoopla⁴⁶, the average house price in Wiltshire is £317,935 – with flats selling for an average of £158,168, terraced houses for an average of £253,863, semi-detached houses for an average of £296,446 and detached houses for an average of £486,235. Furthermore, according to Zoopla⁴⁷, the average house price in Melksham is £285,745 – with flats selling for an average of £126,948, terraced houses for an average £239,151, semi-detached houses for an average of £256,131 and detached houses for an average of £428,834. This suggests that the neighbourhood area has lower than average house prices in comparison to the regional trends. However, the affordability of housing for local residents is a key issue as identified by the IMD data, with ‘barriers to housing and services’ linked to the financial affordability of housing.

Figure A4.3 below indicates housing tenure in the neighbourhood area. According to 2011 Census data, approximately 72.4% of the neighbourhood area households are owned outright or with a mortgage or loan, with an additional 0.5% under shared ownership. 14.4% of the neighbourhood area households are socially rented, 11.8% are privately rented and 0.9% of households live rent free.

⁴⁶ Zoopla (2022) ‘House prices in Wiltshire’ can be accessed [here](#).

⁴⁷ Zoopla (2022) ‘House prices in Melksham’ can be accessed [here](#).

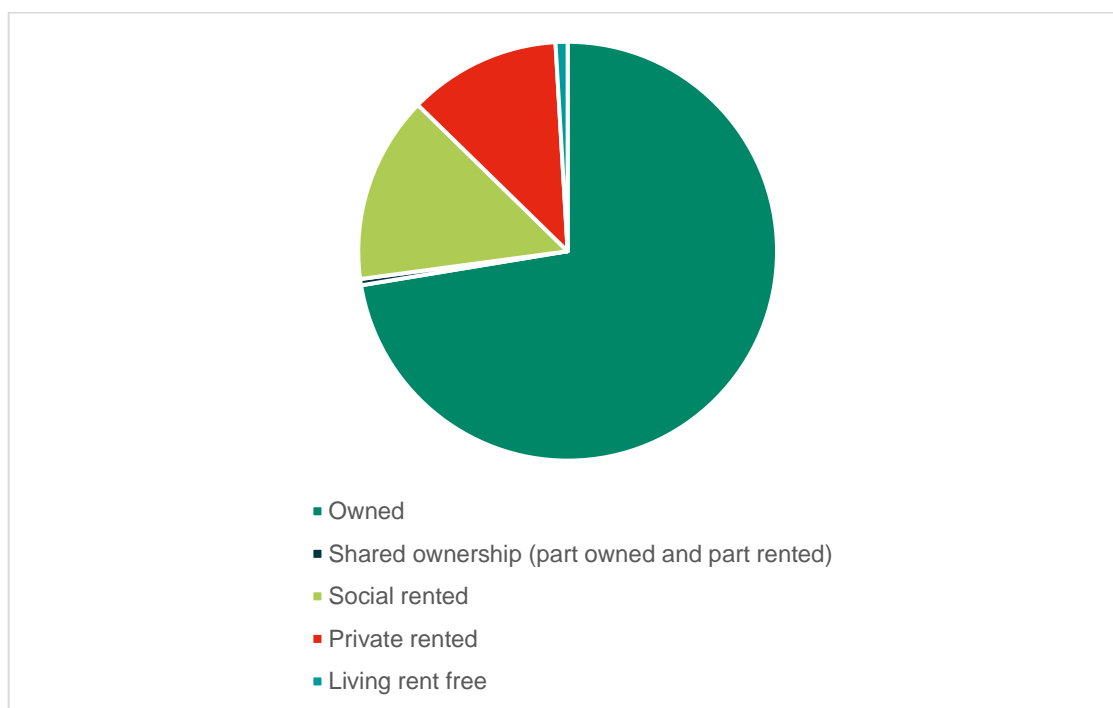


Figure A4.3: Tenure by household composition for the neighbourhood area (based on 2011 Census data)

Community assets and infrastructure

An overview of the services and facilities within the neighbourhood area is provided below^{48,49}:

- Melksham Town parish area:
 - Community centres like Melksham Town Hall and the Bangladeshi Centre.
 - Supermarkets, including (but not limited to) ASDA Melksham Superstore and Waitrose and Partners Melksham.
 - The Melksham Community Campus (including a leisure centre, library and community meeting rooms).
 - The Post Office.
 - Multiple restaurants, including Casa Restaurant and Bar, Refa Tandoori and the West End Inn.
 - Multiple places of worship, including St. Michael's and All Angels' Church and the Queensway Chapel.
 - King George V Park.
 - Various primary schools and nurseries, including (but not limited to) Forest and Sandridge C of E Primary School and River Mead Nursery.
 - Melksham Train Station.
 - Allotments.

⁴⁸ The review of the services, facilities and amenities was conducted via a high-level Google Maps search – focusing on each settlement in the neighbourhood area in turn and making a note of the different features present.

⁴⁹ Joint Melksham Neighbourhood Plan (2020) 'Community Facilities Evidence Base Report' can be accessed [here](#).

- Multiple health facilities, including a community hospital, a GP and dental practices.
- Hotels, including the Kings Arms Hotel.
- Small, local businesses.
- The Spencer Sports and Social Club; and
- Facilities for youth groups, such as the Scout Hut and Guide Centre.
- Melksham Without parish area:
 - Multiple village halls, including Bowerhill Village Hall, Shaw Village Hall and Berryfield Village Hall (it is noted a new village hall is being opened in Berryfield).
 - Places of worship, including Whitley Methodist Church.
 - A gym.
 - Independent businesses.
 - Shops like Tesco Express.
 - Primary schools like Bowerhill Primary School.
 - Whitley Golf Club.
 - Melksham Town Football Club and Rugby Club.
 - Nurseries like Rocking Horse Nursery.
 - Boomerang Play Centre.
 - The Melksham Oak Community School.
 - Travelodge Melksham.
 - A gymnastics school.
 - Bowerhill Sports Field.
 - Beanacre Community Park and Play Area.
 - Large industrial sites in Bowerhill which include businesses like Screwfix, Melksham Motor Spares and Wiltshire School of Gymnastics.
 - Dick Lovett car showrooms.
 - Pubs, including the Pear Tree Inn, The Pilot and the Golden Fleece; and
 - The Melksham Squadron Air Training Corps (2385).

Green infrastructure networks

Access to gardens, parks, woodlands, and rivers have played a huge part in helping people through the COVID-19 pandemic. Almost nine in ten adults surveyed by Natural England reported that being in nature makes them feel happy, and nearly three quarters of adults were concerned about biodiversity loss in England⁵⁰.

Within the neighbourhood area, green spaces include⁵¹:

⁵⁰ Natural England (2020) People and Nature survey can be accessed [here](#).

⁵¹ Joint Melksham Neighbourhood Plan (2021) 'Green Infrastructure Evidence Base Report' can be accessed [here](#).

- Allotments.
- Whitley Golf Club.
- King George V Park.
- Bowerhill Sports Field.
- Accessible natural green space like Conigre Mead Nature Area and Clackers Brook Corridor.
- Blenheim Park.
- Riverside Walk.
- Forresters Park.
- Churchyards, including Melksham Cemetery, St Andrew's Churchyard and Christ Church Shaw Cemetery.
- Various parks and recreation grounds, like Primrose Play Area, Beanacre Community Park, Skylark Play Area and Shaw Play Area.

The JMNP2 is looking to designate new local green spaces, and evidence is being prepared to support the justification of these designations. Once finalised, this evidence will be a useful source of reference during the next stages of the SEA process.

Additionally, a priority of the JMNP1 was to support the restoration of the Wilts and Berks canal, as well as engage with the safeguarding of the future route of the canal. According to the Wilts and Berks Canal Trust website⁵², the Melksham Link was not originally incorporated into the early canal restoration but is now being planned and two proposals should have been submitted by the time of writing this SEA Scoping Report. The proposed route uses the River Avon that runs through Melksham Town.

Future baseline

As the population of the neighbourhood area increases and ages, there is likely to be increasing pressure on services within the neighbourhood area. This highlights the need to support the retention of existing facilities in the area, including open green space, which has been increasingly used and valued through the COVID-19 pandemic. These factors are more likely to be appropriately considered and addressed through planned development rather than unplanned development.

The suitability and affordability of housing for local requirements depends on the implementation of appropriate housing policies throughout the neighbourhood area. Unplanned development may have wider implications in terms of transport and access to infrastructure, or the natural environment.

The COVID-19 pandemic has also changed the way people work and shop. For many people, working from home is likely to continue to form part of a more flexible approach. The effects of increased levels of home working are further discussed under the 'Transportation' SEA theme.

⁵² Wilts and Berks Canal Trust (2022) 'Melksham Link: 2006 – Present' can be accessed [here](#).

A.5 Historic environment

Focus of theme

This chapter presents the policy context and the baseline summary in relation to the historic environment SEA theme. The theme focuses on designated and non-designated assets, the setting, special qualities, and significance of heritage assets, locally important heritage features, and the historic character of the neighbourhood area. This information is used to identify key issues (both constraints and opportunities) before proposing a relevant SEA objective and supporting assessment questions.

Policy context

Table A5.1 below presents the most relevant documents identified in the policy review for the purposes of the SEA.

Table A5.1: Plans, policies and strategies reviewed in relation to the historic environment SEA theme.

Document title	Year of publication
National Planning Policy Framework (NPPF)	2021
National Model Design Code	2021
The National Design Guide	2019
Historic England: Heritage and Climate Change	2022
Historic England Advice Note 1: Conservation Area Appraisal Designation and Management	2019
A Green Future: Our 25 Year Plan to Improve the Environment	2018
Historic England Good Practice Advice in Planning: The Setting of Heritage Assets	2017
Historic England Advice Note 8: Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA)	2016
Historic England Advice Note 3: The Historic Environment and Site Allocations in Local Plans	2015
Wiltshire Council - Consultation report and next steps	2021
Wiltshire Council - Local Plan Review consultation	2021
Joint Melksham Neighbourhood Plan 2020-2026	2020
Wiltshire Council - Wiltshire Core Strategy	2015

The key messages emerging from the review are summarised below:

- The key principles for the conservation and enhancement of the historic environment are as follows:
 - The historic environment is a shared resource;
 - Everyone should be able to participate in sustaining the historic environment;
 - Understanding the significance of places is vital;
 - Important places should be managed to sustain their values;

- Decisions about change must be reasonable, transparent, and consistent; and
- Documenting and learning from decisions is essential⁵³.
- The significance of a place is the crucial element that supports the conservation and enhancement of the historic environment. Significance is the collective term for the sum of all the heritage values attached to a place, no matter what form the place takes. This means a singular building, an archaeological site, or a larger historic area, such as a whole village or landscape, can be important.
- The JMNP2 will need to consider the principles set out in the NPPF, which seek to conserve and enhance historic environment assets in a way that compliments and works with their significance. The NPPF pursues planning policies and decisions that are understanding to local character and history without preventing or discouraging appropriate innovation and change. The NPPF supports the use of area-based character assessments, design guides and codes, and masterplans to help ensure that land is used efficiently while also creating beautiful and sustainable places.
- The NPPF indicates proposed plans should ensure the design of streets, parking areas and other transport elements reflect current national guidance including the National Design Guide and the National Model Design Code. Design codes can set out a necessary level of detail in sensitive locations. In the case of the historic environment, they can indicate specific ways to maintain local character.
- The 25 Year Environment Plan and the National Design Guide recognise and reiterate the role of the historic environment in supporting healthy and thriving ecosystems, landscapes, and cultural values. Of note in the 25 Year Environment Plan is ‘Goal 6: Enhanced beauty, heritage, and engagement with the natural environment’.
- Historic England’s Heritage and Climate Change strategy document details the impacts climate change could have on heritage in the future, and highlights the role of heritage in climate action. The vision of the document is to ensure the role of heritage in the global fight to limit climate change and its impact on people and places by 2040 – working to mitigate, manage risk and adapt.
- Historic England’s Advice Notes provide further guidance on the conservation and enhancement of the historic environment. Of relevance for the JMNP2 is the emphasis on the importance of:
 - Understanding the different types of special architectural and historic interest that underpin designations and the consideration of how settings and / or views contribute to the significance of heritage assets.
 - Recognising the value of implementing controls through neighbourhood development plans, conservation area appraisals and management plans; and

⁵³ Historic England (2008) ‘Conservation Principles, Policies and Guidance for the sustainable management of the historic environment’ can be accessed [here](#).

- Appropriate evidence gathering, including the clear identification of any issues that threaten an area, asset character, or appearance that merit the introduction of management measures.
- The JMNP2 will also be required to be in general conformity with the policies of the Wiltshire Core Strategy. This includes:
 - Core Policy 57: Ensuring High Quality Design and Place Shaping.
 - Core Policy 58: Ensuring the Conservation of the Historic Environment.
- Due regard is also given to the emerging Wiltshire Local Plan Review, which works to safeguard the historic environment by delivering sustainable development and construction methods in the built environment.

Current baseline

Listed buildings

Listed buildings are nationally designated heritage assets that are protected through the Planning (Listed Buildings and Conservation Areas) Act 1990⁵⁴. To assess the historic environment, the National Heritage List for England, provided by Historic England⁵⁵, has been utilised. According to this search engine, there are 225 listed buildings within the neighbourhood area: one Grade I, five Grade II* and 219 Grade II. The location of these assets is shown in **Figure A5.1** at the end of the chapter.

The Grade I listed building is Beanacre Old Manor – Historic England (HE) list number [1021755](#). The Grade II* listed buildings are as follows:

- Church of St Michael – HE list number [1021707](#).
- Turner memorial in the churchyard about 45 metres south of Lady Chapel of the Church of St Michael – HE list number [1021708](#).
- Woolmore Farmhouse – HE list number [1021762](#).
- Christ Church – HE list number [1194686](#); and
- Beanacre Manor with Dairy – HE list number [1364152](#).

There are a large number of listed buildings within Melksham, concentrated along King Street, Spa Road, Bank Street, Church Street, Church Walk, Cannon Square and the area around St Michael and All Angels' Church. Within Melksham Without, the listed buildings are mostly concentrated along Beanacre Road (A350) and the Old Road south of Beanacre, and in Whitley – along West Hill, Bath Road, First Lane, Folly Lane, Top Lane and Corsham Road.

Conservation areas

Conservation areas are designated because of their special architectural and historic interest. Conservation area appraisals are a tool to demonstrate the area's special interest, explaining the reasons for designation and providing a greater understanding and articulation of its character - mentioned within the 'Conservation Area Designation, Appraisal and Management' advice note by Historic England.

⁵⁴ UK Government (1990) 'Planning (Listed Buildings and Conservation Areas) Act' can be accessed [here](#).

⁵⁵ Historic England (no date) 'National Heritage List for England – Search the List – Advanced Search' can be accessed [here](#). Select which heritage categories you'd like to view and enter 'Wiltshire' into the 'District/Unitary Authority/Borough' box and then 'Melksham' and 'Melksham Without' into the 'Parish (Civil / Non-civil)' box in turn and press the search button at the bottom of the page.

Within the neighbourhood area there is one conservation area – Melksham conservation area, which can be viewed on the Wiltshire online mapping system⁵⁶. There is no appraisal or plan available for this conservation area

Registered parks and gardens

Historic England's 'Register of Parks and Gardens of Special Historic Interest in England', established in 1983, currently identifies over 1,600 sites assessed to be of significance.

The Grade II Spye Park⁵⁷ is immediately north-east of the neighbourhood area, located within Bromham parish. It is the remains of an early 18th century garden by Stephen Switzer, within a late 18th century pleasure grounds and landscape park. There is evidence of further late 19th century landscaping. There are two large lawns that offer wide views into the surrounding countryside, and three areas of park with a variety of tree species.

Locally important heritage features

It is noted that not all of the neighbourhood area's historic environment features are subject to statutory designations and non-designated features contribute a large part of what people interact with on a day-to-day basis. Although not designated, many buildings and areas are of historic interest and are important to local communities. It is noted the neighbourhood group are preparing a list of important heritage assets to contribute to the evidence base for the emerging JMNP2 which will inform the plan policy. This evidence, once completed, will be an essential source of reference during the next stages of the SEA process.

The Wiltshire and Swindon Historic Environment Record (HER) identifies important and distinctive structures or features that positively contribute to the local sense of place and distinctiveness of the county. Following a high-level review of the HER via the Heritage Gateway⁵⁸, there are 525 documented local records within the neighbourhood area – 99 in Melksham and 426 in Melksham Without, including enclosures, archaeological finds, ditches and banks, Bronze Age barrows and locally important infrastructure. During the subsequent stages of the SEA process, the Wiltshire and Swindon HER shall be explored in further detail to consider the potential impacts associated with the plan proposals on these assets.

Heritage at risk

Since 2008, Historic England has produced an annual Heritage at Risk Register, which highlights historic environment assets that are seen to be 'at risk'. According to the 2021 Heritage at Risk Register for the South West⁵⁹, there is one heritage asset within the neighbourhood area that is considered to be at risk – the Grade II listed Church of St Andrew (HE number: [1286098](#)).

However, it is important to recognise that Heritage at Risk registers for areas outside of London do not contain information about the status of Grade II listed buildings. As such, it is currently not possible to determine whether any of the Grade II listed buildings within the neighbourhood area are at risk.

⁵⁶ Wiltshire Council (2021) 'Wiltshire Core Strategy' can be accessed [here](#).

⁵⁷ Historic England (2022) 'Spye Park' can be accessed [here](#).

⁵⁸ Heritage Gateway (2021) 'More Detailed Search' can be accessed [here](#). Open the link, change the tab from 'map' to 'admin location', type 'Melksham' into the administrative location search bar and press the search button at the bottom of the page. Then repeat the process for 'Melksham Without'.

⁵⁹ Historic England (2021) 'Heritage at Risk Register 2021 – South West' can be accessed [here](#).

Future baseline

New development in the neighbourhood area has the potential to impact on the fabric and setting of heritage assets, for example, through inappropriate design and / or layout. It should be noted, however, that existing historic environment designations offer a level of protection to heritage assets and their settings. Additionally, the planning system has in place tools to offer a degree of protection to heritage assets and their settings, reducing the potential impacts of development to some degree.

It is recognised that planning for development could provide opportunities for positive effects for the historic environment. This may include new management plans for assets 'at risk', an updated evidence base to compliment information and data associated with conservation areas, public realm and access improvements, or opportunities to better reveal the significance of an asset or increase enjoyment of the historic environment.

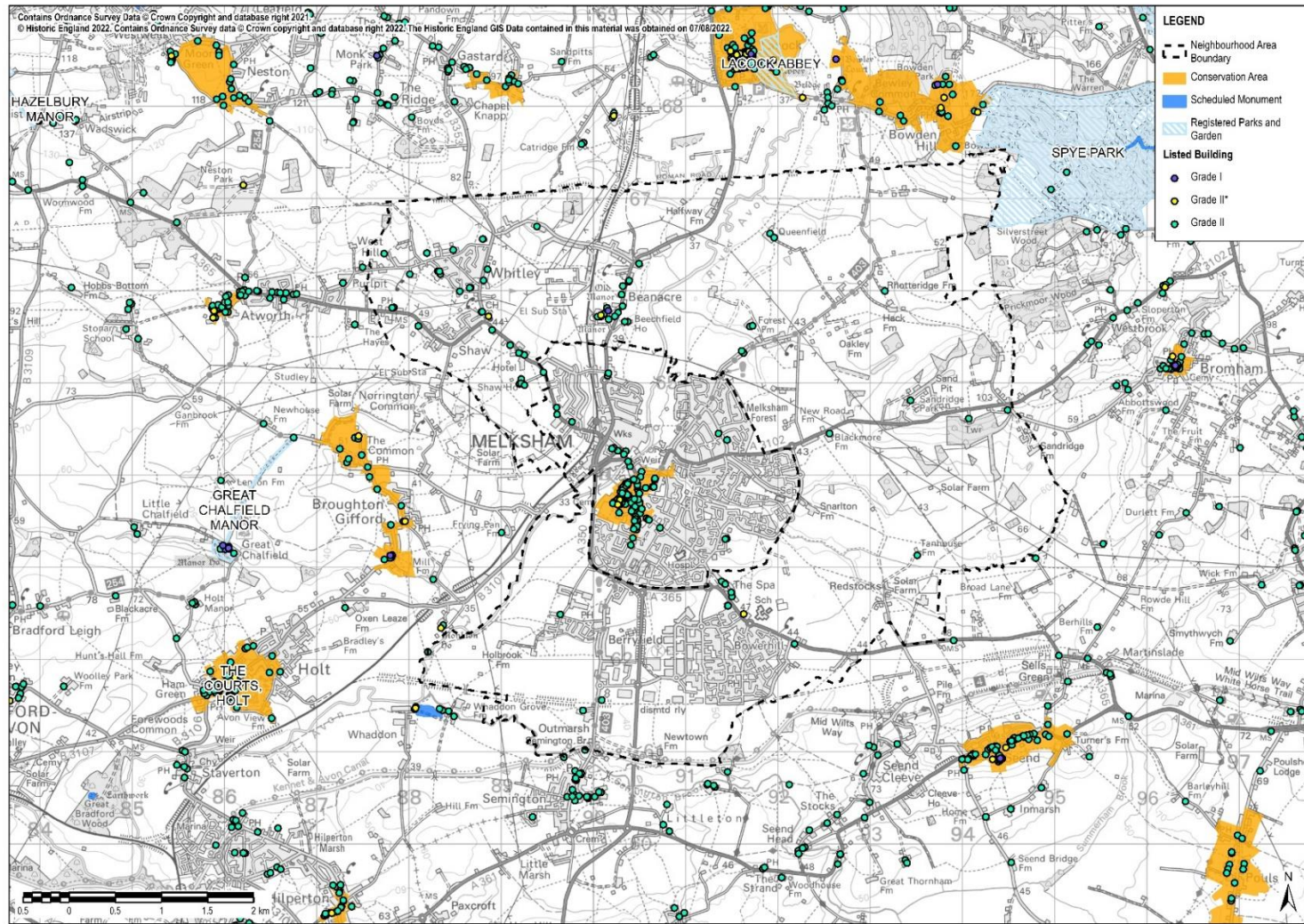


Figure A5.1: Historic environment assets in the neighbourhood area

A.6 Land, soil, and water resources

Focus of theme

This chapter presents the policy context and baseline summary in relation to the land, soil, and water resources SEA theme. The theme focuses on quality of agricultural land, extent of mineral resources, and water resources and water quality. This information is used to identify key issues (both constraints and opportunities) before proposing a relevant SEA objective and supporting assessment questions.

Policy context

Figure A6.1 below presents the most relevant documents identified in the policy review for the purposes of the SEA.

Table A6.1: Plans, policies and strategies reviewed in relation to the land, soil, and water resources SEA theme.

Document title	Year of publication
National Planning Policy Framework (NPPF)	2021
A Green Future: Our 25 Year Plan to Improve the Environment	2018
Waste Management Plan for England	2013
Future Water: The Government's water strategy for England	2011
Water for Life	2011
Safeguarding our Soils: A Strategy for England	2009
Wessex Water's Water Resource Management Plan	2019
Wiltshire Council - Consultation report and next steps	2021
Wiltshire Council - Local Plan Review consultation	2021
Joint Melksham Neighbourhood Plan 2020-2026	2020
Wiltshire Council - Wiltshire Core Strategy	2015
Wiltshire and Swindon Minerals Core Strategy 2006-2026	2009
Wiltshire and Swindon Waste Core Strategy 2006-2026	2009

The key messages emerging from the review are summarised below:

- The JMNP2 will need to consider the principles outlined in the NPPF which pursue the protection of high-quality soil resources and the improvement of the water environment. It recognises the wider benefits of natural capital and the need to consider the long-term implications of climate change and ways in which to build resilience in this respect. The NPPF encourages efficient land use, utilising brownfield land opportunities and land remediation schemes where appropriate and delivering environmental gains.
- The 25 Year Environment Plan discusses measures to improve soil quality, restore and protect peatlands, use water more sustainably, reduce pollution, maximise resource efficiency and minimise environmental impacts. Of note is 'Chapter 1: Using and managing land sustainably', 'Chapter 4: Increasing resource efficiency, and reducing pollution and

waste’, ‘Goal 2: Clean and plentiful water’, ‘Goal 5: Using resources from nature more sustainably and efficiently’ and ‘Goal 8: Minimising waste’.

- Future Water: The Government’s water strategy for England sets out how the water sector will look by 2030 for both people and wildlife. The vision also includes valuing and protecting water resources and delivering water to customers in a fair, affordable, and cost-reflective manner. Water for Life highlights the Government’s vision for a more resilient water sector. It details the measures that will be deployed to tackle issues such as poorly performing ecosystems, and the combined impacts of climate change and population growth on stressed water resources.
- The Safeguarding our Soils: A Strategy for England policy paper seeks to ensure that all soils in England will be managed sustainably, and degradation threats minimised successfully by 2030. This policy paper also seeks to secure sustainable and resilient water resources in addition to the improvement in waterbody quality. The Waste Management Plan for England identifies measures being taken to move towards a zero-waste economy, which includes national waste plan which seeks to identify measures being taken to move towards a circular economy in which resources are kept in use for longer. To do this, there needs to be a maximisation in the value of resources used and a minimisation in the waste created.
- The neighbourhood area is serviced by Wessex Water. The Wessex Water Water Resources Management Plan (WRMP) outlines the issues the water provider faces, like climate change and supply problems, and outlines what measures will be taken to overcome these, including the installation of smart meters.
- The JMNP2 will also be required to be in general conformity with the policies of the Wiltshire Core Strategy. This includes:
 - Core Policy 56: Contaminated Land.
 - Core Policy 68: Water Resources.
- Due regard is also given to the emerging Wiltshire Local Plan Review, which works to safeguard and enhance land, soil, and water resources through:
 - Tackling flood risk and promoting sustainable water management; and
 - Enhancing blue/green infrastructure and biodiversity.
- The JMNP2 will be required to be in line with the Wiltshire and Swindon Minerals Core Strategy 2016-2026 which takes the overall approach to “*manage the availability, extraction and use of primary, secondary and recycled mineral resources whilst seeking to protect the interests of local communities and the wider environment through a series of strategic policies*”.
- The JMNP2 will also be required to be in general conformity with the Wiltshire and Swindon Waste Core Strategy 2016-2026 which “*sets out the strategic planning policy framework for waste management over the next 20 years*”.

Current baseline

Soil resources

The Agricultural Land Classification (ALC) classifies land into six grades (plus ‘non-agricultural land’ and ‘urban’), where Grades 1 to 3a are recognised as being the ‘best and most versatile’ (BMV) land and Grades 3b to 5 are of poorer quality. In this context, there is a need to avoid loss of higher quality BMV agricultural land.

As shown in the left-hand image in **Figure A6.1** below, the majority of the neighbourhood area is underlain with Grade 3 ‘Good to Moderate’ agricultural land, with areas of Grade 4 ‘Poor’ land around Beanacre and to the east of Melksham Town. There are areas of Grade 2 ‘Very Good’ land on the eastern boundary and along the A350 to the north of Melksham Town, as well as an area of Grade 1 ‘Excellent’ land around Berryfield to the south. Melksham Town is classified as ‘land predominantly in urban use’⁶⁰.

Figure A6.1 also shows the results of Natural England’s ‘Predictive Best and Most Versatile (BMV) Land Assessment’ for the South West region in the right-hand image. It indicates the majority of the undeveloped land within the neighbourhood area has a low likelihood of being BMV land, with areas of moderate likelihood located towards the north, north-east and north-west of the neighbourhood area, and areas of high likelihood around Berryfield to the south and along the A350 to the west. Melksham, Berryfield, Bowerhill, Beanacre and Whitely are classified as ‘urban / industrial’⁶¹.

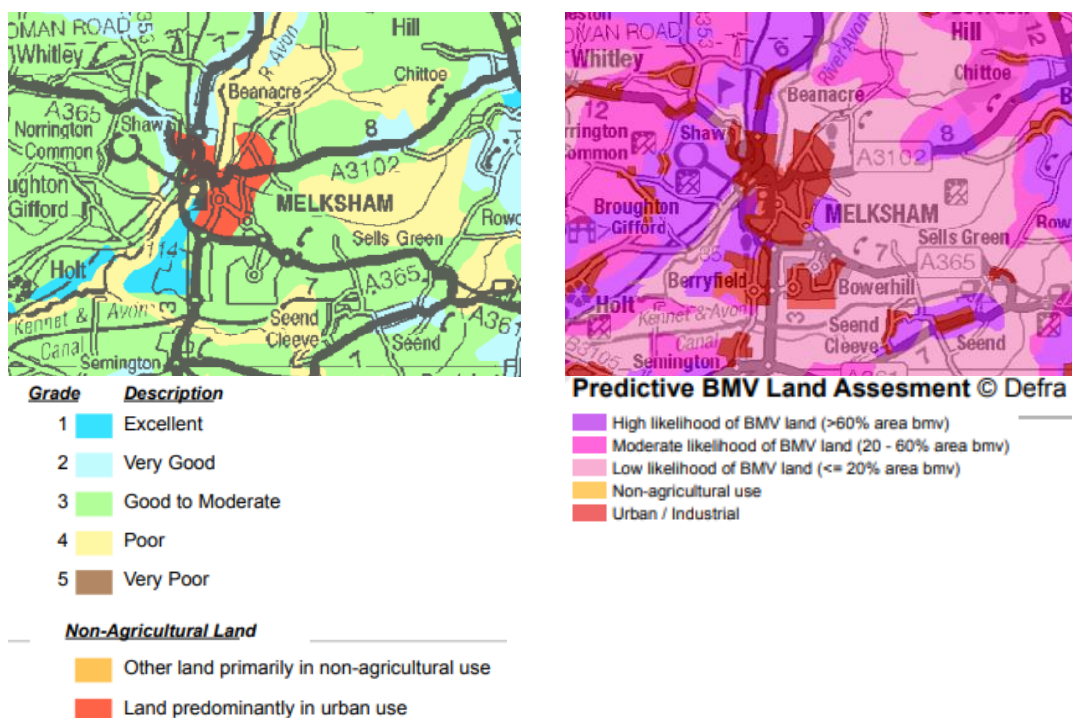


Figure A6.1: ALC and the likelihood of BMV land within the neighbourhood area

⁶⁰ Natural England (2010) ‘Agricultural Land Classification Map South West Region’ can be accessed [here](#).

⁶¹ Natural England (2017) ‘Likelihood of Best and Most Versatile (BMV) Agricultural Land – Strategic scale map South West Region’ can be accessed [here](#).

Mineral resources

Mineral resources are defined as natural concentrations of minerals or bodies of rock that have the potential to be of economic interest in the present or the future due to their inherent properties. As minerals are a non-renewable resource, minerals safeguarding is deployed as the process through which it is ensured that non-minerals development does not needlessly prevent the future extraction of mineral resources⁶².

With regards to mineral resources, the western part of the neighbourhood area appears to be within a mineral resource zone⁶³. However, the Wiltshire and Swindon Minerals and Waste Development Framework Policies Map does not have the clearest resolution; as such, Wiltshire Council may need to be consulted for development in the neighbourhood area to ensure key areas for minerals are not negatively affected through development.

Water quality

The neighbourhood area is located within the Severn Basin District. Specifically, within the Avon Bristol and Somerset North Streams Management Catchment and the Avon Bristol Rural Operational Catchment. There are several waterbodies within the neighbourhood area (which can be viewed on the Catchment Data Explorer⁶⁴):

- South BK – source to conf R Avon (Brist) Water Body⁶⁵ is a tributary of the River Avon. It was awarded a good ecological status in 2019 but failed the chemical status test for the presence of priority hazardous substances including mercury and its compounds and polybrominated diphenyl ethers (PBDE).
- Avon (Brist) conf R Marden to conf Semington Bk Water Body⁶⁶ is a section of the River Avon and a tributary located in Berryfield. It was awarded a moderate ecological status in 2019 but failed the chemical status test for the presence of priority hazardous substances including mercury and its compounds, perfluorooctane sulphonate (PFOS) and PBDEs.
- Forest Brook Water Body⁶⁷ is a tributary of the River Avon. It was awarded a poor ecological status in 2019 and failed the chemical status test for the presence of mercury and its compounds and PBDEs.
- Clackers Bk – source to conf R Avon (Brist) Water Body⁶⁸ was awarded a poor ecological status in 2019 and failed the chemical status test for the presence of mercury and its compounds and PBDEs.

Nitrate Vulnerable Zones (NVZs) represent areas at risk from agricultural nitrate pollution, identifying rules in relation to the use of fertilisers and manures as well as a requirement to prevent water pollution from farming areas⁶⁹. According to the interactive map⁷⁰ the north-western part of the neighbourhood area (west of the A350

⁶² UK Government (2014) 'Guidance: Minerals' can be accessed [here](#).

⁶³ Wiltshire Council (2013) 'Wiltshire and Swindon Minerals and Waste Development Framework: Policies Map' can be accessed [here](#).

⁶⁴ Environment Agency (2022) 'Catchment Data Explorer' can be accessed [here](#).

⁶⁵ Environment Agency (2022) 'South BK – source to conf R Avon (Brist) Water Body' can be accessed [here](#).

⁶⁶ Environment Agency (2022) 'Avon (Brist) conf R Marden to conf Semington Bk Water Body' can be accessed [here](#).

⁶⁷ Environment Agency (2022) 'Forest Brook Water Body' can be accessed [here](#).

⁶⁸ Environment Agency (2022) 'Clackers Bk – source to Conf R Avon (Brist) Water Body' can be accessed [here](#).

⁶⁹ UK Government (2018) Nitrate vulnerable zones can be accessed [here](#).

⁷⁰ UK Government (2021) Nitrate vulnerable zone designations and appeals 2021 to 2024 can be accessed [here](#).

and Beanacre) is within the Surface Water S559 – S bk – source to conf R Avon (Brist) NVZ.

Groundwater Source Protection Zones (SPZs) have been defined by the Environment Agency in England and Wales to protect groundwater sources such as wells, boreholes, and springs that are used for public drinking water supply⁷¹. There is a small section of the neighbourhood area around Brittle Wood that is within Zone I – Inner Protection Zone and Zone II – Outer Protection Zone.

Future baseline

New development in the neighbourhood area has the potential to impact areas of BMV agricultural land. In this context there could potentially be opportunities to avoid developing Grade 3a agricultural land by directing development toward areas of Grade 3b land where this is available. Additionally, the regeneration of brownfield sites is encouraged, wherever possible.

Future development has the potential to affect water quality and availability through increased consumption and pollution, wastewater discharges, water runoff and modification. Wessex Water are likely to maintain adequate water services over the plan period; therefore, it will be important for new development to avoid negative impacts on water quality, and instead contribute to reducing consumption and improving efficiency.

A.7 Landscape

Focus of theme

This chapter presents the policy context and baseline summary in relation to the landscape SEA theme. The theme focuses on nationally protected landscapes, landscape character and quality, and visual amenity in the neighbourhood area. This information is used to identify key issues (both constraints and opportunities) before proposing a relevant SEA objective and supporting assessment questions.

Policy context

Table A7.1 below presents the most relevant documents identified in the policy review for the purposes of the SEA.

Table A7.1: Plans, policies, and strategies reviewed in relation to the landscape SEA theme

Document title	Year of publication
National Planning Policy Framework (NPPF)	2021
National Model Design Code	2021
The National Design Guide	2019
A Green Future: Our 25 Year Plan to Improve the Environment	2018
Wiltshire Council - Consultation report and next steps	2021
Wiltshire Council - Local Plan Review consultation	2021
Joint Melksham Neighbourhood Plan 2020-2026	2020

⁷¹ UK Government (2017) 'Groundwater Protection' can be accessed [here](#).

Document title	Year of publication
Joint Melksham Neighbourhood Plan - Community Character and Distinctiveness Statement	2020
Joint Melksham Neighbourhood Plan - Local Landscape Character Report	2020
Wiltshire Council - Wiltshire Core Strategy	2015

The key messages emerging from the review are summarised below:

- The JMNP2 should consider the principles outlined in the NPPF, which gives great weight to conserving and enhancing protected landscapes, landscape character, and scenic beauty. The scale and extent of development within these areas should be limited and development within their setting should be mindfully located and designed to avoid/minimise adverse impacts on the designated areas.
- The NPPF also recognises the role of green infrastructure in landscape settings, as well as the positive contribution that land remediation can have on despoiled, degraded, derelict, contaminated, and unstable land.
- The 25 Year Environment Plan and National Design Guide outline the same aims as one another, focusing on creating a cleaner, greener country that puts the environment first and celebrates the variety of natural landscapes and habitats present in the UK. Design is focused on creating beautiful, enduring, and successful places, which respond to local character and provide a network of high quality and green open spaces. Of note is 'Chapter 2: Recovering nature and enhancing the beauty of landscapes' and 'Goal 6: Enhanced beauty, heritage and engagement with the natural environment'.
- The National Model Design Code states that all design codes should include a landscape and open space strategy that incorporates the existing natural features and new structural elements. It recognises that landscapes can be major drivers in the design process.
- The JMNP2 will also be required to be in general conformity with the policies of the Wiltshire Core Strategy. This includes:
 - Core Policy 51: Landscape.
 - Core Policy 57: Ensuring High Quality Design and Place Shaping; and
 - Core Policy 58: Ensuring the Conservation of the Historic Environment.
- Due regard is also given to the emerging Wiltshire Local Plan Review, which works to safeguard and enhance the landscape through enhancing blue and green infrastructure and biodiversity.

Current baseline

Nationally protected landscapes

There are no nationally protected landscapes within the neighbourhood area. However, approximately 3.8km to the west of the neighbourhood area is the Cotswolds Area of Outstanding Natural Beauty (AONB), approximately 2.3km west is the Bristol and Bath Greenbelt, and approximately 4.6km to the east is the North Wessex Downs AONB. Although the proposals in the JMNP2 are unlikely to impact

on the setting of these nationally important landscapes due to the distance between them and the JMNP2 area, it will be important for the plan to consider the special qualities of the surrounding landscape and how development could impact local landscape significance. Both AONB management plans should be referred to in order to ensure development works with the landscape effectively^{72,73}. The location of the AONBs in relation to the neighbourhood area is demonstrated in **Figure A7.1** at the end of the chapter.

National character areas

National Character Areas (NCAs) are areas that share similar landscape characteristics, and which follow natural lines in the landscape rather than administrative boundaries. This makes them valuable in creating decision-making frameworks for the natural environment.

The neighbourhood area overlaps with two NCAs – 117 Avon Vales⁷⁴ and 107 Cotswolds⁷⁵. The Avon Vales NCA is characterised by the underlying and undulating clay vale with a mix of arable and pasture farming landscapes, transport corridors along roads and watercourses, large historic parks and mansions and numerous low ridges with local views over towns and villages. The Cotswolds NCA is characterised by its underlying geology of limestone scarp (influencing drainage, soils, vegetation, land use and settlement), locally quarried limestone that gives a sense of unity across the landscape, large areas of common land, arable farming and a rich history that includes Neolithic barrows, iron-age forts and Roman roads and villas, medieval structures and WW2 airfields.

The NCA profiles will be useful sources of reference during the following stages of the SEA process due to their management principles and detailed landscape sensitivities.

Local landscape, townscape and villagescape character

Landscape, townscape and villagescape character play an important role in understanding the relationship between people and place and identifying recognisable and distinct patterns in the landscape which make one area different from another. Landscape and villagescape character assessments can both help identify the value of landscapes and villagescapes, in terms of visual and amenity value.

According to the Melksham Neighbourhood plan Local Landscape Character report⁷⁶, four local landscape character areas overlap with the neighbourhood area, shown in **Figure A7.2** below and described as follows:

- Limestone lowland around Whitley and Shaw; characterised by a level and gently undulating landscape, extensive views and a distinct pattern of irregular fields enclosed by fragmented hedgerows.
- Avon clay river floodplain runs from the north through Melksham and then to the southwest and the east; characterised by the River Avon, an intricate network of

⁷² Cotswolds AONB (2018) 'Cotswolds Area of Outstanding Natural Beauty Management Plan 2018-2023' can be accessed [here](#).

⁷³ North Wessex Downs AONB (2019) 'North Wessex Downs Area of Outstanding Natural Beauty Management Plan 2019-2024' can be accessed [here](#).

⁷⁴ Natural England (2014) 'NCA Profile: 117 Avon Vales (NE522)' can be accessed [here](#).

⁷⁵ Natural England (2013) 'NCA Profile: 107 Cotswolds (NE420)' can be accessed [here](#).

⁷⁶ Joint Melksham Neighbourhood Plan (2020) 'Local Landscape Character Neighbourhood Plan Evidence Base Report' can be accessed [here](#).

footpaths along an intimate river corridor and a sense of tranquillity throughout the area.

- Open clay vale is the dominant landscape type in the neighbourhood area; characterised by a general sense of openness, a flat low-lying landscape with mixed use farmland, and a scattered settlement pattern with a comprehensive footpath network.
- Wooded Greensand Hills is around Bowden Hill in the neighbourhood area; characterised by steeply rising western slopes that provide dramatic views, wooded parkland around Sandridge Park and a strong sense of tranquillity.

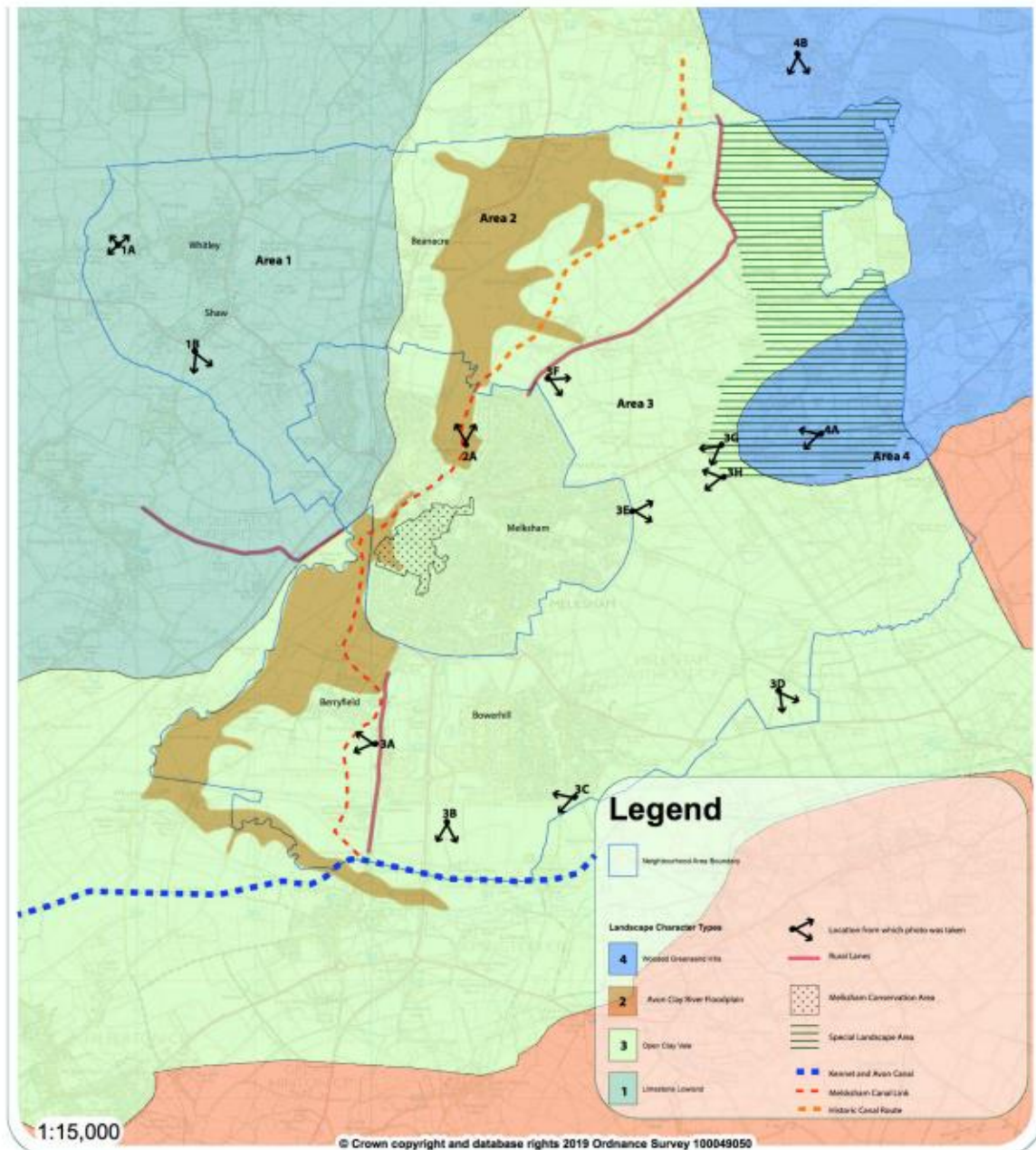


Figure A7.2: Local landscape character areas in the neighbourhood area

Additionally, according to the Local Landscape Character report⁷⁷, there is an area to the north-east of the neighbourhood area that is designated as a ‘special landscape

⁷⁷ Ibid.

area' – an area of high landscape quality. This report will be an essential source of reference during the next stages of the SEA process, along with the Community Character and Distinctiveness Statement, which provides character area assessments for Melksham Town.

Additional evidence documents have recently been prepared, including a design codes package and a masterplanning package (with a focus on Melksham Town) – these documents will also be essential sources of evidence for the SEA to draw upon and will accompany the JMNP2 at Regulation 14 consultation.

It is recognised that the neighbourhood group are completing a landscape gap assessment (with a view to designating gaps within the JMNP2), and, once created, this evidence will be a useful source of reference during the next stages of the SEA and will accompany the JMNP2 at Regulation 14 consultation.

Visual amenity

It is useful to note that views of and across the neighbourhood area are also an important factor to consider in the planning process, as the scale, height, and mass of development can ultimately impact on important views. Changes like development and landscape change can see these important views and vistas degraded overtime.

Future baseline

New development has the potential to lead to small, incremental, but cumulative changes in the landscape character and quality within the neighbourhood area. This includes the loss or damage of features and areas with an important visual amenity value. The JMNP2 can help guide development so that it does not negatively impact upon the landscape and visual features which contribute to the distinctive character of the area.

It should be noted that the planning system has tools in place to offer a degree of protection to the landscape. Therefore, new development will not necessarily result in harm. Furthermore, locally distinctive landscape features, characteristics and special qualities can be protected, managed, and enhanced through appropriate planning policies. It is further recognised that new development that is appropriately designed and landscape led could support the area's intrinsic landscape character and quality. This could include regeneration that improves the setting of the villages, delivering green infrastructure improvements and / or new recreational opportunities and the identification and / or enhanced framing of key views.

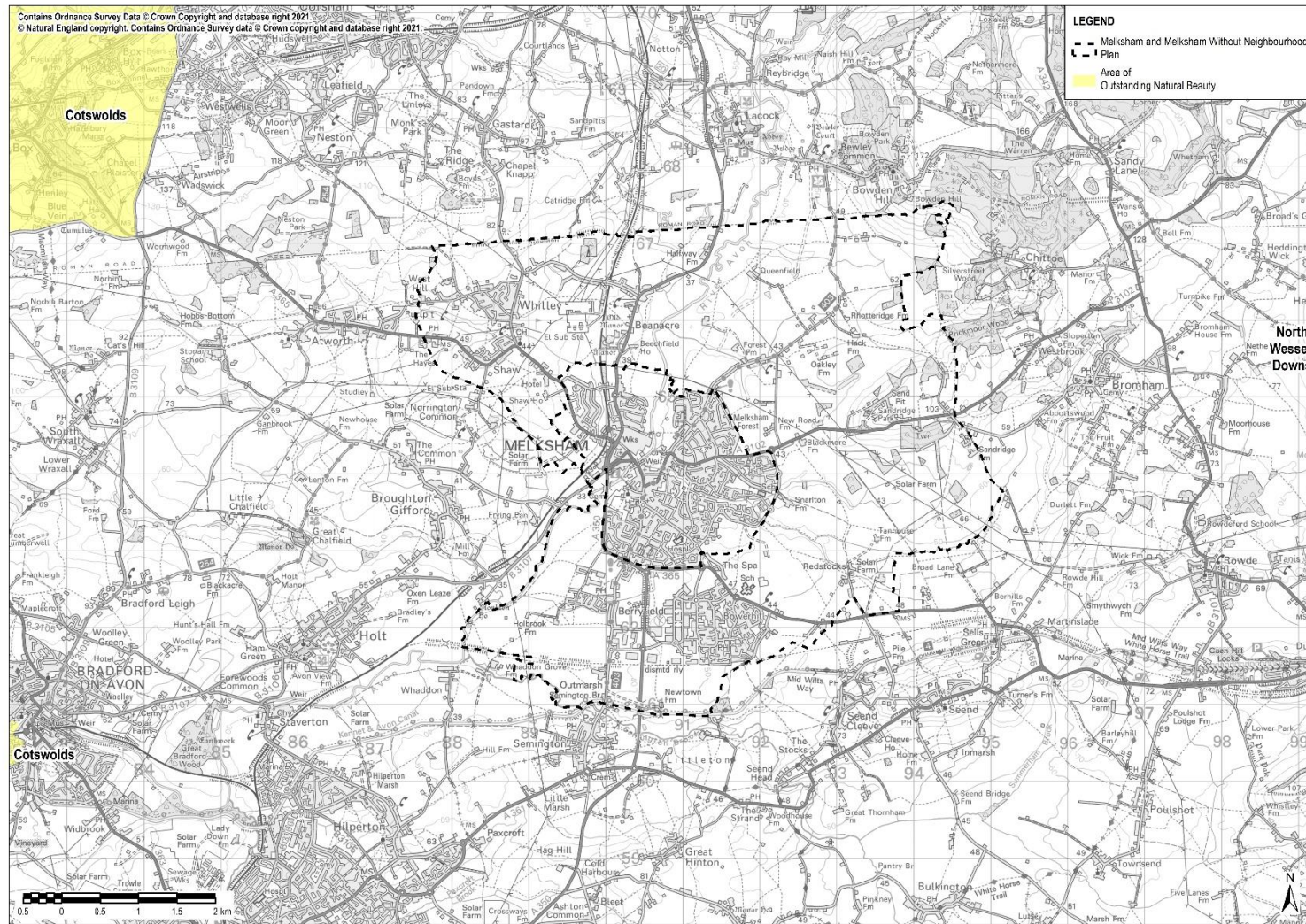


Figure A7.1: AONB locations in relation to the neighbourhood area

A.8 Transportation

Focus of theme

This chapter presents the policy context and baseline summary in relation to the transportation SEA theme. The theme focuses on transport infrastructure, transport use, traffic flows and congestion, accessibility, and active travel opportunities within and surrounding the neighbourhood area. This information is used to identify key issues (both constraints and opportunities) before proposing a relevant SEA objective and supporting assessment questions.

Policy context

Table A8.1 below presents the most relevant documents identified in the policy review for the purposes of the SEA.

Table A8.1: Plans, policies, and strategies reviewed in relation to the transportation SEA theme

Document title	Year of publication
National Planning Policy Framework (NPPF)	2021
Decarbonising Transport: A Better, Greener Britain	2021
Transport Investment Strategy	2017
Wiltshire Council - Consultation report and next steps	2021
Wiltshire Council - Local Plan Review consultation	2021
Joint Melksham Neighbourhood Plan 2020-2026	2020
Wiltshire Council - Wiltshire Core Strategy	2015
Wiltshire Local Transport Plan 3 2011-2026	2011

The key messages emerging from the review are summarised below:

- The JMNP2 will need to consider the principles outlined in the NPPF, which influence plans and development proposals to ensure they consider transport issues from the earliest stages, address any known issues, and maximise opportunities to increase accessibility to sustainable transport. Larger developments are expected to limit the need to travel and offer a genuine choice of transport modes. However, it is recognised that sustainable transport solutions will vary between urban and rural environments.
- Decarbonising Transport: A Better, Greener Britain sets out how the UK Government will deliver emission reductions and associated benefits in the country; presenting the path to net-zero transport in the UK and the commitments and actions necessary to make progress on this path.
- The Transport Investment Strategy sets out investment priorities to improve the connectivity, effectiveness and reliability of transport network whilst simultaneously reducing impacts on the natural environment. Furthermore, the document places great emphasis on making cycling and walking the natural choice for shorter journeys, or as part of longer journeys.

- The Wiltshire Local Transport Plan 2011-2026 seeks the development of a transport system that supports economic growth, choice and opportunity across Wiltshire's communities whilst also being sensitive to the environment and considering climate emissions. The plan identifies the following five challenges in delivering a sustainable transport system for the area:
 - A largely rural county with many historic towns and villages.
 - Relatively high car ownership levels and small, isolated pockets of access deprivation.
 - The changing climate and the prospect of 'peak oil'.
 - Significantly lower funding for transport; and
 - Increasingly elderly population.To address these challenges, the Wiltshire Local Transport Plan sets out several strategic objects to help achieve the following five goals:
 - Support economic growth.
 - Reduce carbon emissions.
 - Contribute to better safety, security, and health.
 - Promote equality of opportunity; and
 - Improve quality of life and a healthy natural environment.
- The JMNP2 will also be required to be in general conformity with the policies of the Wiltshire Core Strategy. This includes:
 - Core Policy 60: Sustainable Transport.
 - Core Policy 61: Transport and Development.
 - Core Policy 62: Development Impacts on the Transport Network.
 - Core Policy 63: Transport Strategies; and
 - Core Policy 66: Strategic Transport Network.
- Due regard is also given to the emerging Wiltshire Local Plan Review, which works to promote sustainable transport and active travel.

Current baseline

Rail network

There is a rail station in the neighbourhood area – Melksham train station is operated by Great Western Railway and offers services to Swindon and Westbury⁷⁸, which also stop at Chippenham and Trowbridge. Swindon rail station⁷⁹ and Westbury rail station⁸⁰ offer services to a variety of locations including London Paddington, Bristol Temple Meads, Cardiff Central, Weston-super-Mare, Portsmouth Harbour, Paignton and Weymouth. It is also useful to note that there are services from Chippenham and Trowbridge rail stations^{81,82} to Bath Spa rail station, which are likely to be used regularly by JMNP2 residents (as Bath is approximately 10km to the west of the

⁷⁸ GWR (2022) 'Melksham' can be accessed [here](#).

⁷⁹ GWR (2022) 'Swindon' can be accessed [here](#).

⁸⁰ GWR (2022) 'Westbury' can be accessed [here](#).

⁸¹ GWR (2022) 'Chippenham' can be accessed [here](#).

⁸² GWR (2022) 'Trowbridge' can be accessed [here](#).

neighbourhood area). The service runs weekdays at approximately two hourly intervals, and there are slightly less services on a Sunday. For the service to be more viable for many of the JMNP2 residents, it is desirable to increase the frequency of services, provide better links to the local bus network, and provide an earlier start and later service in each direction.

Bus network

According to the Melksham Without website⁸³ and the Bustimes website⁸⁴, there are multiple bus services within the neighbourhood area. FromeBus⁸⁵ operates services 14, 15 and X69 in the neighbourhood area. Services 14 and 15 operate solely within the neighbourhood area, and X69 runs between Melksham and Frome. It is noted services X69 is an infrequent service that does not operate in the evenings or on Sundays.

Faresaver⁸⁶ offers services 68, 69, 271, 272, 273, 555 and X34. Services 68 and 69 provide access to Corsham, Bradford-on-Avon and Trowbridge, services 271, 272 and 273 provide access to Bath and Devizes, and X34 allows access to Chippenham, Trowbridge and Frome. Service 555 is a school bus service to Corsham. It is noted service X34 does not currently run in the evenings, which reduces its value as a core service for commuting or evening leisure activity. This is similar to services 68 and 69, which do not operate in the evenings or on Sundays. Additionally, services 271, 272 and 273 have very limited evening frequencies in the limiting use for evenings out in Bath.

Swindon's Bus Company runs one service in the neighbourhood area – service X76⁸⁷ provides access to Marlborough, Bath, Cherhill, Calne and Bathford.

The Bustimes website also notes there are two community bus schemes operating in the neighbourhood area – the Seend Shuttle⁸⁸ and the Urchfont Community Bus⁸⁹.

All bus services are very limited on Sundays.

Road network and congestion

The main roads within the neighbourhood area are the A350, A3102 and A365 – the A350 allows for access to Chippenham and the M4 to the north and Westbury, Warminster and the A361 to the south. The A3102 allows access to Calne and the A342 to the east and the A365 allows access to the A361 to the south-east, which links Devizes to the A361 and A350.

The key routes that allow entry into Melksham Town are Bath Road (connecting Melksham Town to Whitley and Shaw), the A350 Beanacre Road / Semington bypass, Forest Road, Sandridge Road and the B3107 Bradford Road. The Eastern Way and Western Way ring roads pass around the east and south of Melksham Town (connecting to Bowerhill and Berryfield).

⁸³ Melksham Without Parish Council (no date) 'Local Transport' can be accessed [here](#).

⁸⁴ Bustimes (no date) 'Melksham' can be accessed [here](#).

⁸⁵ FromeBus (no date) 'Timetables' can be accessed [here](#).

⁸⁶ Faresaver (2022) 'Timetables' can be accessed [here](#).

⁸⁷ Swindon's Bus Company (2022) 'X76 Marlborough to Bath' can be accessed [here](#).

⁸⁸ Bustimes (no date) 'Seend Shuttle to Melksham' can be accessed [here](#).

⁸⁹ Bustimes (no date) 'Urchfont Community Bus to Bath via Devizes' can be accessed [here](#).

Other important roads in the neighbourhood area include the B3353 that connects Melksham Town to Corsham, and Forest Road, Woodrow Road, Westlands Lane and Semington Road, which lead to both Melksham Town and Melksham Without.

The first JMNP⁹⁰ indicates high levels of traffic congestion is a common occurrence on the A350. As such, it has been identified as a key issue for the two parishes of Melksham and Melksham Without.

The first JMNP referred to proposals to upgrade the A350 with a Melksham bypass with appropriate crossing points for cyclists, pedestrians and livestock. This bypass would allow for the A350 to avoid running through Melksham Town, therefore avoiding a critical pinch point, and improve north to south connectivity throughout the Western Gateway. It is noted that the discussion around the bypass in the first JMNP received a number of public comments, but that the bypass is an issue outside of the neighbourhood plan scope.

Public Rights of Way (PRoW)

According to the digital map available on the Wiltshire Council website⁹¹, there are a multitude of PRoWs within the neighbourhood area. This includes footpaths, bridleways, restricted byways and byways open to all traffic.

Additionally, according to the LDWA website, there are a couple of long distance walking paths that cross over the neighbourhood area. This includes the Wilts and Berks Canal Towpath⁹², the North Wiltshire Rivers Route⁹³ and the Kennet and Avon Canal Walk⁹⁴.

Future baseline

Given the multiple options for sustainable transport within the neighbourhood area and for travel outside of it (rail network and bus network), it is difficult to predict the volume of private vehicle usage. Although use of sustainable transport should be encouraged, for example by early provision of local bus services in new developments, allowance must be made for potential private vehicle use to avoid further traffic congestion. However, a minor increase could still have an impact on the traffic concerns related to the A350.

As discussed in previous chapters, considering the COVID-19 pandemic and changing working habits, the provision of infrastructure to facilitate working from home may contribute towards transport management, but it is difficult to predict the long-term outcome. Whilst negative effects of new development on the transport network are likely to be mitigated in part by new infrastructure, there will be a continuing need for development to be situated in accessible locations.

⁹⁰ Joint Melksham Neighbourhood Plan (2020) 'Joint Melksham Neighbourhood Plan 2020-2026 Referendum Version' can be accessed [here](#).

⁹¹ Wiltshire Council (2021) 'Wiltshire Council Rights of Way Explorer' can be accessed [here](#).

⁹² LDWA (2022) 'Wilts and Berks Canal Towpath' can be accessed [here](#).

⁹³ LDWA (2022) 'North Wiltshire Rivers Route' can be accessed [here](#).

⁹⁴ LDWA (2022) 'Kennet and Avon Canal Walk' can be accessed [here](#).

