

**Strategic Environmental Assessment for the Joint
Melksham Neighbourhood Plan**

**Addendum Environmental Report to accompany the
Regulation 14B version of the Neighbourhood Plan**

Neighbourhood Plan Steering Group

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1 Introduction

This is an addendum to the Strategic Environmental Assessment report for the second Joint Melksham Neighbourhood Plan (JMNP2). It has been produced to assess proposed revisions to the site allocations in the Regulation 14B Draft of the Joint Melksham Neighbourhood Plan (JMNP2).

The initial main report was prepared in October 2023 to accompany a Regulation 14 pre-submission consultation of the draft JMNP2. The SEA report was provided by consultants AECOM as part of the Locality Technical Support programme provided to JMNP2 during financial year 2023-24.

2 Significant Changes to the Draft JMNP2

As a result of significant new circumstances within the JMNP2 area, additional evidence and responses to the 2023 Regulation 14 consultation representations, revisions have been made to the draft JMNP2 site allocations.

In consultation with Wiltshire Council and AECOM, it is considered that the revisions are of a significance to require:

- (a) An addendum to the SEA and report
- (b) A second period of Regulation 14 consultation in 2024 on what will be termed 'pre-submission draft B JMNP2'.

3 Scope of Revisions for Addendum Assessment

Three significant revisions to the draft JMNP2 have been proposed.

I. Policy 7.1REV: Land at Cooper Tires

In response to additional capacity and viability evidence, a proposed revised allocation supports development of in-excess of 150 dwellings where this addresses flood risks and supports viable mixed-use re-development.

II. Policy 7.6 NEW: Land South of Western Way, Bowerhill

A proposed new allocation of Land South of Western Way regularises the principle of residential development of this greenfield site that has been established by the November 2023 appeal decision to grant outline consent for 210 dwellings and 70 bed care home. In doing so, JMNP2 is required to account for the environmental and sustainable development implications of this proposed allocation.

III. Policy 7.7 NEW: Land at Middle Farm, Whitley.

This new allocation is proposed in response to further land-owner information and Regulation 14A representations. It is proposed to consolidate previously proposed site allocations 7.3 and 7.4 into a single proposed allocation with a significantly reduced overall allocation area than the combined area of the two separate sites.

4 SEA Addendum Methodology

This SEA report addendum appraises the environmental implications of the proposed amended JMNP2 allocations strategy. It does so with regard to the assessment of site allocation alternative approach options A (Brownfield) and B (Greenfield) that were assessed as part of the full SEA process and report.

The addendum assessment is undertaken using the SEA framework and sustainability 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.

The appraisal has drawn upon evidence gathered in the JMNP2 sites assessment process, including independent site suitability assessments of all promoted sites undertaken by AECOM. In relation to site 1025, Land South of Western Way, it has also had regard to the Sustainability Appraisal undertaken by Wiltshire Council as part of its assessment of SHELAA sites in selecting proposed Local Plan allocation sites at Melksham.

The addendum SEA has been undertaken by Vaughan Thompson MRTPI, of Place Studio Ltd, who is a chartered town planner with more than 20 years' experience in policy drafting and significant knowledge of Melksham and JMNP2.

5. SEA Addendum Assessment of Revised Allocation Policies - Non-technical Summary

I. Policy 7.1REV Land at Cooper Tires

Regulation14A Policy 7.1 proposed the allocation of the 12.88 hectare brownfield site for the development of about 150 dwellings within a mixed-use regeneration of the former factory site.

Reason for Revision

Viability assessment evidence supporting the proposed allocation has identified a viable mixed-use development of the site requires enabling development of in excess of 150 dwellings.

Capacity and case study analysis has identified capacities for between 100-130 dwellings on Flood Zones 1 and c80-120 on land in Flood Zone 2. The allocation commits to delivery of at least 150 dwellings in the JMNP2 period to 2028 within a phased master planned approach. But it is supportive of development of c300 dwellings across the site, subject to addressing flood risk issues. This increases the overall potential residential content by c150 above previously tested allocation.

The allocation retains the brownfield land regeneration approach that has been found to be most allocation sustainable option.

Air Quality

Increased residential development may lead to increased emissions, balanced against reduced employment development. However, the site is highly sustainably located to enable sustainable transport and low car use.

Biodiversity and Geodiversity

The site has very low levels of biodiversity except for the riverside. Increased residential development will not affect the requirement to deliver 10% net gain in biodiversity.

Climate Change and Flood Risk

The site location is highly sustainable. Increased housing on the site will minimise the production of greenhouse gases from residents when compared with provision on greenfield land.

Two hectares of land within Flood Zones 1 is capable of enabling residential development outside of flood risk. Additional housing to support viability, will need to be developed in at least zone 2 and potentially zone 3. This will be subject to further flood assessment, exceptions testing or measures to make safe or reduce the areas of higher flood risk as described in the site-wide Flood Assessment report (WSP 2024). Subject to resolving flood mitigation issues, the site is assessed to be the most sustainable location for housing and employment development.

Landscape

Additional residential development will have no material impact on the effect of development of the Cooper Tires site on nationally designated landscapes.

Wellbeing

Residential development of the site is well-connected to local facilities and open space and mixed uses and services within the developed site. Whilst a further c150 dwellings will increase demands, it would be expected to make proportionate contributions to support increased provisions.

Viability assessment and case study analysis has demonstrated that affordable housing provision may need to be reduced to 10%. Increased housing will increase the number of affordable homes delivered.

Heritage

Additional residential development will have no material harmful impact on the effect of development of the Cooper Tires site on nationally designated heritage assets or locally designated assets. Residential conversions of heritage assets may create greater opportunities for their re-use.

Land, Soil and Water

Development of the site will necessitate remediation of contaminated land. Residential development will provide value to enable this a.

Transport

Residential development will increase vehicle movements on the local highway network and greenhouse gas emissions. However, the site location maximises the viability of active and sustainable travel choices when compared with development of greenfield sites.

Conclusion

The increase of housing provision of c150 across the site is likely to *moderately* increase the sustainable development outcomes of the site.

II. New Policy 7.6NEW: Land South of Western Way

Proposed allocation of the 10.24 hectare greenfield site is additional to the allocation of brownfield sites at Melksham.

The site was excluded after JMNP2 sites assessment stage 1 as it was considered to contribute to the separation of Melksham, Bowerhill and Berryfield. But it was also assessed by Wiltshire Council's Sustainability Appraisal as the most sustainable potential allocation site.

Due to the granting of outline consent for development of 210 dwellings and a 70-bed residential care home in November 2023, during the JMNP2 Reg14 period, the significant change in circumstances has required changes to the JMNP2 approach. This combines;

- I. Deletion of the proposed Policy 19 Green Wedge.
- II. Allocation of the site for residential development

Reasons for Allocation

JMNP2 has a duty to plan positively within the constraints and realities of the context of Melksham. This must include these new circumstances.

The aims of the proposed allocation are'

- To regularise and account for the principle of development of housing and Affordable Housing within the JMNP2 period.
- To proactively manage the content and design of housing and infrastructure that are significant detailed matters still to be resolved.

Air Quality

Greenfield development is more likely to lead to the loss of trees and hedgerows (natural absorbers of pollutants) which may exacerbate air quality issues.

There is no AQMA in Melksham. Increased traffic feeding into the network of roads causing additional air quality pressure. As such, steps would need to be taken to mitigate the additional impact of any development.

The site is within 900m of the town centre. Walking, cycling and public transport use is viable. The site has potential to support active and sustainable transport infrastructure.

All electric housing with ULEV charging can help mitigate greenhouse gas emissions.

Whilst greenfield development may result in higher emissions, the site's location and size maximises the potential for low carbon emissions through sustainable construction, electrification and active and sustainable travel.

Biodiversity and Geodiversity

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. Option A is ranked more favourably than Option B.

The site comprises two small, arable fields, bound by a combination of hedgerows and narrow tree belts while also containing mature trees. It is bound to the north, south and west by two small watercourses. It is within a wider area which supports great crested newts (GCN). The hedgerows provide good connectivity around the site while the small copse off site to the southern boundary and open space to the south provide good newt terrestrial habitat. Development could result in the loss of the habitat.

Protection, maintenance of existing landscape and habitats has potential to mitigate to impact on site ecology. A minimum of 10% net gain for biodiversity is required within individual sites (as per latest biodiversity metric) and the overall layout and design of this site should ensure that habitat creation

Green buffers should protect any ecologically valuable features while the provision of biodiverse open space should provide opportunities for biodiversity enhancement.

Development is likely to be moderately harmful. However, it has the potential to mitigate impacts through application of JMNP2 landscape policies and delivery of 10% biodiversity net gain.

Climate Change and Flood Risk

Greenfield development has potential to deliver more coordinated infrastructure, due to the larger size of available sites, including green energy and active travel infrastructure, to contribute to reduction in operational emissions. However, it is also likely to lead to a higher dependency on the private car use producing greenhouse gases.

The site is in Flood Zone 1 and there is minimal fluvial, pluvial or groundwater flood risk.

This is a smaller site which should produce fewer emissions than a larger one. It is considered that there are opportunities to support resilient development, which supplies energy efficient buildings and provides investment in renewable energy. It is possible for new development to be in Flood Zone. The minor adverse effect of development may be mitigated by:

- Sustainable construction and all-electric dwellings
- Small-scale renewable energy generation
- Connectivity to sustainable transport

The site has no significant flood risk. It is a well-located and sufficiently large greenfield site to enable implementation of a range of carbon results on and climate change resilience measures.

Landscape

Impact landscape character by reducing the amount of open countryside surrounding the town and between settlements, which contribute 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.

The site is locally valued as rural separation between Melksham, Bowerhill and Berryfield. Its development will be considered harmful in principle. However, there are no visible relationship with designated national landscape. The landscape is not designated and judged of moderate landscape value. Greatest values internal trees and boundary hedgerow.

Mitigations:

- Protection of existing trees and hedgerow
- Enhancement of trees canopy cover towards 20% target.
- Retention of areas of public open space could increase publicly accessible green space and GBI connections

The development of the site will erode separation between settlements. But protection and enhancement of valued landscape features and creation of linked GBI can increase public access to the site.

Well-being

Rural open space will be lost to development impacting existing residents. Development will put additional demands on existing community facilities

Greenfield development of relatively large schemes which could offer a wide range of housing types and tenures, including affordable homes and potential to generate significant contributions for community infrastructure enhancements,

Development at the settlement edge provides easier access to the surrounding countryside, with positive impacts on the health and wellbeing of residents.

The site would support a range of types and tenures of homes to meet local needs including care home facilities. These would viably meet 30/40% affordable housing thresholds.

Contributions to support education and community infrastructure will mitigate strain on facilities

Provision of sustainable transport connections are viable to local facilities and town centre. Potential for on-site open space/play facilities and leisure walking routes

On-site community benefits delivered through a range of market and affordable housing, open space and viable active travel connections mitigate for the loss of agricultural land

Heritage

Greenfield development 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.

There are no setting or on-site relationships with listed buildings or JMNP2 non-designated heritage assets or known archaeological remains.

Site development not likely to be harmful to heritage. Archaeological investigation can establish need for protection

Land and Soil and Water

Development will lead to the permanent loss of greenfield land, including agricultural land which cannot be mitigated.

The site is Grade 3 Good Quality agricultural land. Development will require significant new water and drainage infrastructure. Surrounding water courses could be adversely affected by development of site

Perimeter boundary buffer landscape and SUDS May mitigate impacts on existing water courses

The site will result in the loss of valued agricultural land. However, landscape and GBI protection and enhancement may reduce the impact and introduce alternative benefits,

Transport

Greenfield development would be likely to lead to higher levels of car use. Larger scale sites can integrate active and sustainable travel infrastructure and link to public transport to local facilities.

The site is within 900m of town centre. Walking and cycling is viable. It is well-related to local services.

Western Way obstruction of pedestrian cycle connections. Constrained vehicle and pedestrian access. Not viable from A roads. Impact on amenity of residents of Maitland Place.

Mitigation:

- Controlled Toucan crossing of Western Way + new pedestrian footways.
- Potential for pedestrian / cycle connections to schools, facilities, employment at Bowerhill
- On-site active and sustainable travel infrastructure
- Residential ULEV charging

The site has the best potential to minimise car use by location and potential to include a range of sustainable transport infrastructure measures.

Conclusion

Allocation Policy 7.6 is proposed in response to the new circumstances of the outline consent establishing the principle of development for c210 dwellings and extinguishing the opportunity for JMNP2 to designate the site as a Green Wedge (reflected in JMNP2 Policy 19R).

JMNP2 retains its priority of allocation of brownfield land, considered the most sustainable SEA alternative Option A. Adding the greenfield site is aligned with less sustainable SEA alternative Option B. This has potential to result in moderate levels of additional harm, particularly to biodiversity, landscape and land soils and water and well-being of some neighbouring residents.

However, the site location is capable of enabling viable active and sustainable transport connections to facilities. Its size enables protection of valued GBI and community access to open space. The site also delivers potential for the site to enable early delivery of a range of affordable, specialist and market homes that will probably precede and compliment delivery of housing at Cooper Tires. These minor benefits to wellbeing and GBI can be weighed against potential moderate harm caused by allocation.

III. Policy 7.7 NEW: Land at Middle Farm

Revisions to the draft plan consolidate previously proposed allocations 7.3: Land at Middle Farm (Plot A) and Policy 7.4: Land at Middle Farm (Plot B) into a new single site allocation. The new allocation for c55 dwellings combines the total housing delivery of the two sites. However, through a more efficient use of the land, the allocation of c3 hectares is c3.5 hectares smaller, significantly reducing the development area and retaining land in agricultural use.

The revised allocation therefore provides a more sustainable and less impactful outcome in the following SEA Framework topics;

Air Quality

No impact

Biodiversity and Geodiversity

Reduction of the site area by c3,5 hectares reduces the impact on existing habitats. The site retains the capacity to enable protection of hedgerow and buffer zones.

Climate Change and Flooding

Reduced impact from development of greenfield land. No increased flood risk.

Landscape

Significant reduction in landscape and visual impact. The reduced site reduces the extension of residential development in longer views of the setting of Whitley.

Potential for landscape buffering to mitigate visual impacts and create visual buffer to electricity sub-station.

Wellbeing

No change

Heritage

Increased density of development to c30DPH may have an increased potential for harm to the setting of Whitley House (listed Grade 2). Heritage assessment to identify potential issues and mitigations.

Land, Soil and Water

C50% reduction in removal of valuable agricultural land.

Transport

No change

Conclusion

Revised allocation 7.7 retains the allocation amount and approach tested by the main SEA report. It results in moderate reduction to potential harm to landscape, biodiversity and land, soil and water by reducing the total area of allocated land from c6.5 hectares to c3 hectares.

6. Effect of Revisions on Alternative Development Scenarios

The full SEA report assessed two alternative approaches to sites allocation by JMNP2 to identify the least environmentally impactful and most sustainable approach.

It tested:

- Option A: Brownfield First Approach
- Option B: Greenfield Approach

It concluded that overall Option A performed better. But recorded that in some instances greenfield allocations provided alternative opportunities that were less viable on brownfield land.

JMNP2 has adopted a brownfield first approach to site allocations at Melksham. New circumstances and evidence have informed the proposed revision of allocation of the Cooper Tires site (Policy 7.1REV) and the new allocation of a greenfield site, South of Western Way (Policy 7.6 NEW)

At Whitley new evidence and in response to Regulation 14A representations, a significant change is proposed to allocation of land at Middle Farm (Policy 7.7 NEW).

These revisions and addition have been considered with regard to the SEA Framework and alternative approaches to ensure their implications are taken into account.

Air Quality	
<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>7.1REV: Cooper Tires –</p> <ul style="list-style-type: none"> • Increased use of most sustainable site. <p>Neutral</p>
<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 	<p>7.6NEW: South of Western Way –</p> <ul style="list-style-type: none"> • Most sustainable reasonably available greenfield site. • Potential to mitigate loss of GBI & minimise carbon emissions <p>Minor additional harm</p> <p>7.7NEW: Land at Middle Farm –</p>

	<ul style="list-style-type: none"> • Reduced loss of GBI <p>Moderate benefit</p>
Biodiversity & Geodiversity	
<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>7.1REV: Cooper Tires –</p> <ul style="list-style-type: none"> • Increased viability to address ground contamination. <p>Minor benefit</p>
<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. 	<p>7.6NEW: South of Western Way –</p> <ul style="list-style-type: none"> • Outline consent establishes principle of development. • Allocation will contribute to cumulative loss. • 10% biodiversity net gain <p>Moderate additional harm</p> <p>7.7NEW: Land at Middle Farm –</p> <ul style="list-style-type: none"> • Reduced site area-reduced loss. 10% biodiversity net gain <p>Moderate benefit</p>
Climate Change and Flooding	
<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>7.1REV: Cooper Tires –</p> <ul style="list-style-type: none"> • Increased delivery and support of GBI viability. <p>Minor benefit</p>
<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. 	<p>7.6NEW: South of Western Way –</p> <ul style="list-style-type: none"> • No scope for CHP. • No flood risk. • SUDS potential.

<ul style="list-style-type: none"> • 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). 	<p>Minor additional harm</p> <p>7.7NEW: Land at Middle Farm –</p> <ul style="list-style-type: none"> • Reduced site area. <p>Minor benefit</p>
Community Wellbeing	
<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>7.1REV: Cooper Tires -</p> <ul style="list-style-type: none"> • Increased housing delivery at most sustainable and connected location. • Increased viability to support facilities. <p>Minor benefit</p>
<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 	<p>7.6NEW: South of Western Way –</p> <ul style="list-style-type: none"> • Loss of Green Wedge designation. • Cumulative impact of greenfield loss. • Most sustainable greenfield site. • Delivery of POS and GBI. • Contributions to facilities and services <p>Moderate harm</p> <p>7.7NEW: Land at Middle Farm –</p> <ul style="list-style-type: none"> • Smaller site. • Unchanged amount of housing

strategic greenfield site allocations likely to come forward through the emerging Local Plan.	Minor benefit
Historic Environment	
<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>7.7NEW: Land at Middle Farm –</p> <ul style="list-style-type: none"> • Potential residential re-purposing of on-site heritage assets <p>Neutral</p>
<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 valued) heritage assets. 	<p>7.6NEW: South of Western Way -</p> <ul style="list-style-type: none"> • No direct relationships of site. <p>Neutral</p> <p>7.7NEW: Land at Middle Farm -</p> <ul style="list-style-type: none"> • No additional impact. <p>Neutral</p>
Land Soil and Water Resources	
<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>7.1REV: Cooper Tires -</p> <ul style="list-style-type: none"> • Intensified mixed use of brownfield land. Added viability to support decontamination. <p>Minor benefit</p>
<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. 	<p>7.6NEW: South of Western Way -</p> <ul style="list-style-type: none"> • Increases loss of rural agricultural land. • Site not part of rural setting of settlement. <p>Moderate harm</p> <p>7.7NEW: Land at Middle Farm -</p> <ul style="list-style-type: none"> • c3 hectare reduction in development site area and retention of agricultural land. <p>Moderate benefit</p>
Landscape	

<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. 	<p>7.1REV: Cooper Tires -</p> <ul style="list-style-type: none"> • No impacts on designated landscapes. • Residential use adds vitality to new public spaces across currently private site. <p>Minor benefit</p>
<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 village 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. 	<p>7.6NEW: South of Western Way -</p> <ul style="list-style-type: none"> • Loss of potential for Green Wedge. • Localised impacts on settling separation. • No impacts on designated landscapes. • Potential for retention of key landscape features and provision of communal open space. <p>Moderate harm</p> <p>7.7NEW: Land at Middle Farm -</p> <ul style="list-style-type: none"> • Reduced landscape impact. <p>Moderate benefit</p>
Transport	
<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>7.1REV: Cooper Tires -</p> <ul style="list-style-type: none"> • No significant change <p>Neutral</p>
<p>Option B</p> <ul style="list-style-type: none"> • Potential to increase the use of private vehicle usage in the neighbourhood 	<p>7.6NEW: South of Western Way -</p>

<p>area through developing land outside the existing built-up area of the town.</p> <ul style="list-style-type: none"> • 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. 	<ul style="list-style-type: none"> • Potential for additional vehicle trips and emissions • Site 900m from town centre. Walking and cycling trips viable/ Opportunities for integration of active and sustainable travel infrastructure. • Pedestrian/cycle access to town centre severed by Western Way. Need for new crossing. • Potential for connection to primary school. <p>Minor harm</p> <p>7.7NEW: Land at Middle Farm -</p> <ul style="list-style-type: none"> • No change resulting. <p>Neutral</p>
Overall Effect of Revised Allocations	
Option A	<p>7.1REV: Cooper Tires -</p> <p>Moderate benefit</p>
Option B	<p>7.6NEW: South of Western Way -</p> <p>Moderate harm</p> <p>7.7NEW: Land at Middle Farm -</p> <p>Moderate benefit</p>

7. SEA Addendum Report Conclusions

The enabling of additional residential development over the total area of the Cooper Tires site increases sustainable development outcomes of the regeneration of this brownfield site and is consistent with JMNP2 SEA Option A “brownfield first” approach to site allocations at Melksham.

Allocation of Land South of Western Way regularises the principle of residential development of this greenfield site established by the November 2023 appeal decision to grant outline consent for 210 dwellings and 70 bed care home. Allocation would result in the

loss of agricultural land and soil and remove open greenfield landscape from a valued gap between settlements. However, the site is assessed as a more sustainable reasonably available greenfield site that is capable of enabling the early and viable delivery of a type and tenure of market and affordable housing within 900m of the town centre with capacity for landscape and biodiversity benefits that partially mitigate the impacts. Affordable housing delivery at 30-40% will help ensure JMNP2's contribution to meeting community wellbeing needs are secured, where viability challenges at Cooper Tires is likely to require a lower level of provision.

JMNP2 has proposed the allocation of all reasonably available brownfield land first. Allocation of greenfield Land South of Western Way helps ensure the delivery of the identified housing requirement on the most sustainable sites, in a sequential approach.

At Whitley, the revised new allocation site at Middle Farm continues to enable the delivery of c55 market and Affordable homes and open space, but significantly reduces the amount of allocated land reducing impacts on land and soil, landscape and biodiversity. However, it retains the core objectives tested in the main SEA report.