

Technical Facilitation Joint Melksham Neighbourhood Plan

Green Gap and Green Wedge Assessment

Final Report
March 2023

Joint Melksham Neighbourhood Plan- Technical Facilitation

Quality information

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Joint Melksham Neighbourhood Plan- Technical Facilitation

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Disclaimer

This Technical Facilitation report is an evidence base report rather than a Neighbourhood Plan policy document. It reports the situation as of February-March 2023 and may be superseded by events and developments after this time.

Abbreviations used in the report

Abbreviation

AONB	Area of Outstanding Natural Beauty
JMNP	Joint Melksham Neighbourhood Plan
LCA	Landscape Character Assessment
LGS	Local Green Space
LVIA	Landscape and Visual Impact Assessment
NCA	National Character Area
NPPF	National Planning Policy Framework
OS	Ordnance Survey
PPG	Planning Practice Guidance
PRoW(s)	Public Right(s) of Way
SHELAA	Strategic Housing and Economic Land Availability Assessment
WC	Wiltshire Council
WCS	Wiltshire Core Strategy

Executive Summary

About this Report

This report is the output of a Technical Facilitation study carried out by AECOM and Icen Projects, to support the emerging replacement Joint Melksham Neighbourhood Plan (JMNP). The replacement Neighbourhood Plan constitutes a review of the JMNP 'made' or adopted in 2021 (referred to as JMNP 2021 in our report). AECOM and Icen Projects' support is carried on behalf of Melksham Town Council and Melksham Without Parish Council, (the 'Qualifying Body'), who together form the Joint Melksham Neighbourhood Plan Steering Group. The work undertaken was agreed with the Qualifying Body and the Department for Levelling Up, Housing and Communities (DLUHC) as part of the national neighbourhood planning Technical Support Programme led by Locality.

The study comprises an assessment of the potential and most appropriate locations for green gaps and green wedges proposed within the replacement JMNP. It was carried out in January, February and March 2023 by planning policy specialists from AECOM and a landscape specialist from Icen Projects.

The report is one element of the evidence base for the replacement JMNP. Its study area comprises the two parishes that make up the neighbourhood area: Melksham (which is governed by a Town Council) and Melksham Without (governed by a Parish Council).

Other elements of the evidence base for the replacement JMNP, covering related but separate issues such as suitability of land for housing allocations or Local Green Space (LGS) designation, will be developed by others alongside this report. The findings of all evidence base studies can be drawn on collectively to develop new Neighbourhood Plan policies directing future development to the most appropriate, sustainable locations.

AECOM and Icen Projects' approach to the study has at all times aimed for impartiality and objectivity, and been guided by technical best practice, in terms of planning advice and landscape assessment. The conclusions of this study, including the suggested policy and supporting text in the Conclusions chapter, are non-binding and are based on technical and physical evidence. Views of stakeholders, such as local residents, councillors, or developers, are not taken into account as part of this study. However, stakeholders may express their views at the replacement JMNP's forthcoming Regulation 14 consultation stage.

Definition of Green Gaps and Green Wedges

A significant challenge faced by a study of this nature is that there is no statutory or Government definition of 'green gap' or 'green wedge' within the planning system in England. However, green gap and green wedge designations feature regularly in adopted Local Plans and made Neighbourhood Plans. As such, there is no in-principle barrier to their designation in a Neighbourhood Plan. The key considerations at past Neighbourhood Plan Examinations appear to centre on the designation policy not being overly restrictive, and on the designation area not being disproportionately extensive in area. The extent to which either of these criteria are met is a matter of judgement on the part of the Neighbourhood Plan Examiner, having regard to national and local policy, guidance, and evidence.

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Given that there is no official definition of green gaps or wedges but that they can be included within a Neighbourhood Plan if they are considered to align with national policy and guidance, plan-makers must take a proportionate, evidence based approach.

It is for this reason that, for the purposes of this study, AECOM and Icen Projects have reviewed in detail examples of adopted Neighbourhood Plans from across England that designate green gaps and wedges (as well as some such designations that failed at Examination) in order to maximise the chances that any such designations in the emerging JMNP pass Examination. The results of this exercise are set out in Chapter 3 below.

Because there is no official designation of green gaps or green wedges, the difference between the two terms is not always clear. However, as Chapter 3 will demonstrate, both terms are regularly used, do not differ in policy terms, and can be considered interchangeable for Neighbourhood Plan purposes. However, the term 'green wedge' tends to be more commonly used than 'green gap' (although we cannot determine the reason for this); for example, the former term is defined in the Planning Portal glossary whereas the latter is not.

For maximum effectiveness and clarity, it is recommended that just one term be used in the replacement JMNP, and that this term should be 'green wedge'. This is because this term reflects the apparent majority preference and, most importantly, allows for use of the Planning Portal glossary definition.

Examples from elsewhere- summary of key points

Based on examples of Neighbourhood Plans made elsewhere, it is considered that any green wedges policy in the emerging JMNP should be informed by the following key points:

- Many Neighbourhood Plans that designate green wedges do so in a context where there are already restrictive policies at a higher level, such as Green Belt, AONBs, or green gaps / wedges in the Local Plan.
- Examiners attach significant weight to evidence of community support for green wedge policies.
- Land within green wedges should specifically exclude existing built-up areas (particularly if within settlement boundaries) or land with permission for residential/commercial development.
- Justification text supporting the case for the green wedges should reference evidence of development pressure within them.
- The precise boundaries of green wedges designated by the policy could be supported by evidence of important views.
- The term coalescence can and should be used in the policy and/or supporting text but needs careful definition.
- The evidence supporting the policy should consider the physical characteristics of each green wedge, explaining key landscape features (and existing development such as farm buildings, if relevant) and how those features contribute to preventing coalescence.

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- The policy should be positively worded and support development to a greater extent than would AONB or Green Belt policy.
- The supporting text, and potentially the policy, should use the language of national policy on local character and identity.
- Clear mapping should be provided alongside the policy.
- The topic of green wedges and avoiding coalescence should be kept separate from any other related policy areas
- The policy should be proportionate in the number and extent of wedges to be defined.
- Attempts to designate green wedges that extend across parish boundaries should be avoided.

Key conclusions and recommendations

On the basis of the evidence considered in this report, the emerging JMNP **can and should include a policy protecting land within designated green wedges** from development that would result in coalescence and loss of settlement identity, and this report could form key evidence supporting that policy. Of the eight potential green wedges considered in this report, six were found to meet the criteria of green wedge designation at Neighbourhood Plan level.

The green wedge policy **should appear in the Regulation 14 consultation draft of the emerging JMNP**. This will enable feedback on the draft policy by relevant stakeholders, including the local community, landowners, developers, and WC.

After Regulation 14 consultation, the policy **should be amended if necessary, based on the representations received by consultees** (or for any other reason deemed appropriate). It can then be carried forward into the submission version of the replacement JMNP, to be reviewed by an independent Examiner against the Basic Conditions of neighbourhood planning.

Section 5.3 of this report presents **one possible suggestion for the wording of a green wedge policy and supporting text which could be included in the replacement JMNP, based on the evidence reviewed**. While there is never any guarantee that such a policy or wording would pass Examination, it is considered that the wording presented would maximise the chances of doing so. It is at any rate deemed appropriate for testing at Regulation 14 stage, to be amended as appropriate following any representations received or for any other reason the Qualifying Body deem appropriate.

The policy should only be included within the neighbourhood plan if **accompanied by a good-quality map clearly showing the boundaries of the green wedge designations**. Figure 17 in Chapter 5 uses Google Earth imagery as a base to indicate what such a map might look like, although for the neighbourhood plan itself, a map with Ordnance Survey (OS) 1:25,000 scale base mapping, relying on an OS mapping license, would be preferable. It is understood that both the Qualifying Bodies hold such licenses.

1. Introduction and Context

1.1 About this Report

- 1.1 This report is the output of a Technical Facilitation study carried out by AECOM and Icen Projects, to support the emerging replacement Joint Melksham Neighbourhood Plan (JMNP). The replacement Neighbourhood Plan constitutes a review of the JMNP 'made' or adopted in 2021 (referred to as JMNP 2021 in our report). AECOM and Icen Projects' support is carried on behalf of Melksham Town Council and Melksham Without Parish Council, (the 'Qualifying Body'), who together form the Joint Melksham Neighbourhood Plan Steering Group. The work undertaken was agreed with the Qualifying Body and the Department for Levelling Up, Housing and Communities (DLUHC) as part of the national neighbourhood planning Technical Support Programme led by Locality.
- 1.2 The study comprises an assessment of the potential and most appropriate locations for green gaps and green wedges (defined below) proposed within the replacement JMNP. It was carried out in January, February and March 2023 by planning policy specialists from AECOM and a landscape specialist from Icen Projects.
- 1.3 The report is one element of the evidence base for the replacement JMNP. Its study area comprises the two parishes that make up the neighbourhood area: Melksham (which is governed by a Town Council) and Melksham Without (governed by a Parish Council).
- 1.4 Other elements of the evidence base for the replacement JMNP, covering related but separate issues such as suitability of land for housing allocations or Local Green Space (LGS) designation, will be developed by others alongside this report. The findings of all evidence base studies can be drawn on collectively to develop new Neighbourhood Plan policies directing future development to the most appropriate, sustainable locations.
- 1.5 AECOM and Icen Projects' approach to the study has at all times aimed for impartiality and objectivity, and been guided by technical best practice, in terms of planning advice and landscape assessment. The conclusions of this study, including the suggested policy and supporting text in the Conclusions chapter, are non-binding and are based on technical and physical evidence. Views of stakeholders, such as local residents, councillors, or developers, are not taken into account as part of this study. However, stakeholders may express their views at the replacement JMNP's forthcoming Regulation 14 consultation stage.

1.2 Definition of Green Gaps and Green Wedges

- 1.6 A significant challenge faced by a study of this nature is that there is no statutory or Government definition of 'green gap' or 'green wedge' within the planning system in England. However, green gap and green wedge designations feature regularly in adopted Local Plans and made Neighbourhood Plans. As such, there is no in-principle barrier to their designation in a Neighbourhood Plan. The key considerations at past Neighbourhood Plan Examinations appear to centre on the designation policy not being overly restrictive, and on the designation area not being disproportionately extensive in area. The extent to which either of these

criteria are met is a matter of judgement on the part of the Neighbourhood Plan Examiner, having regard to national and local policy, guidance, and evidence.

- 1.7 For this reason, there are examples of both green gaps and green wedges that have been deleted at Neighbourhood Plan Examination, where the Examiner considered their definition too restrictive and/or their extent too large. In such cases, the Examiner concluded the policy would fail one or more of the Basic Conditions¹ of neighbourhood planning. In many cases, the failure is against Basic Condition 'a', which requires Neighbourhood Plans to have regard to national policies and advice contained in guidance issued by the Secretary of State (see Chapter 2 below for a review of relevant policy, guidance, and evidence).
- 1.8 Given that there is no official definition of green gaps or wedges but that they can be included within a Neighbourhood Plan if they are considered to align with national policy and guidance, plan-makers must take a proportionate, evidence based approach.
- 1.9 It is for this reason that, for the purposes of this study, AECOM and Icen Projects have reviewed in detail examples of adopted Neighbourhood Plans from across England that designate green gaps and wedges (as well as some such designations that failed at Examination) in order to maximise the chances that any such designations in the emerging JMNP pass Examination. The results of this exercise are set out in Chapter 3 below.
- 1.10 Because there is no official designation of green gaps or green wedges, the difference between the two terms is not always clear. However, as Chapter 3 will demonstrate, both terms are regularly used, do not differ in policy terms, and can be considered interchangeable for Neighbourhood Plan purposes. However, the term 'green wedge' tends to be more commonly used than 'green gap' (although we cannot determine the reason for this); for example, the former term is defined in the Planning Portal glossary² whereas the latter is not.
- 1.11 For maximum effectiveness and clarity, it is recommended that just one term be used in the replacement JMNP, and that this term should be 'green wedge'. This is because this term reflects the apparent majority preference and, most importantly, allows for use of the Planning Portal glossary definition. This definition is as follows: *'the open areas around and between parts of settlements, which maintain the distinction between the countryside and built up areas, prevent the coalescence (merging) of adjacent places and can also provide recreational opportunities.'* Coalescence, in turn, is defined in the Planning Portal glossary as: *'The merging or coming together of separate towns or villages to form a single entity.'*
- 1.12 On this basis, the term 'green wedge' is used instead of 'green gap' in the remainder of this report, with the exception of the review of other Neighbourhood Plans that have chosen the term 'green gap' instead.

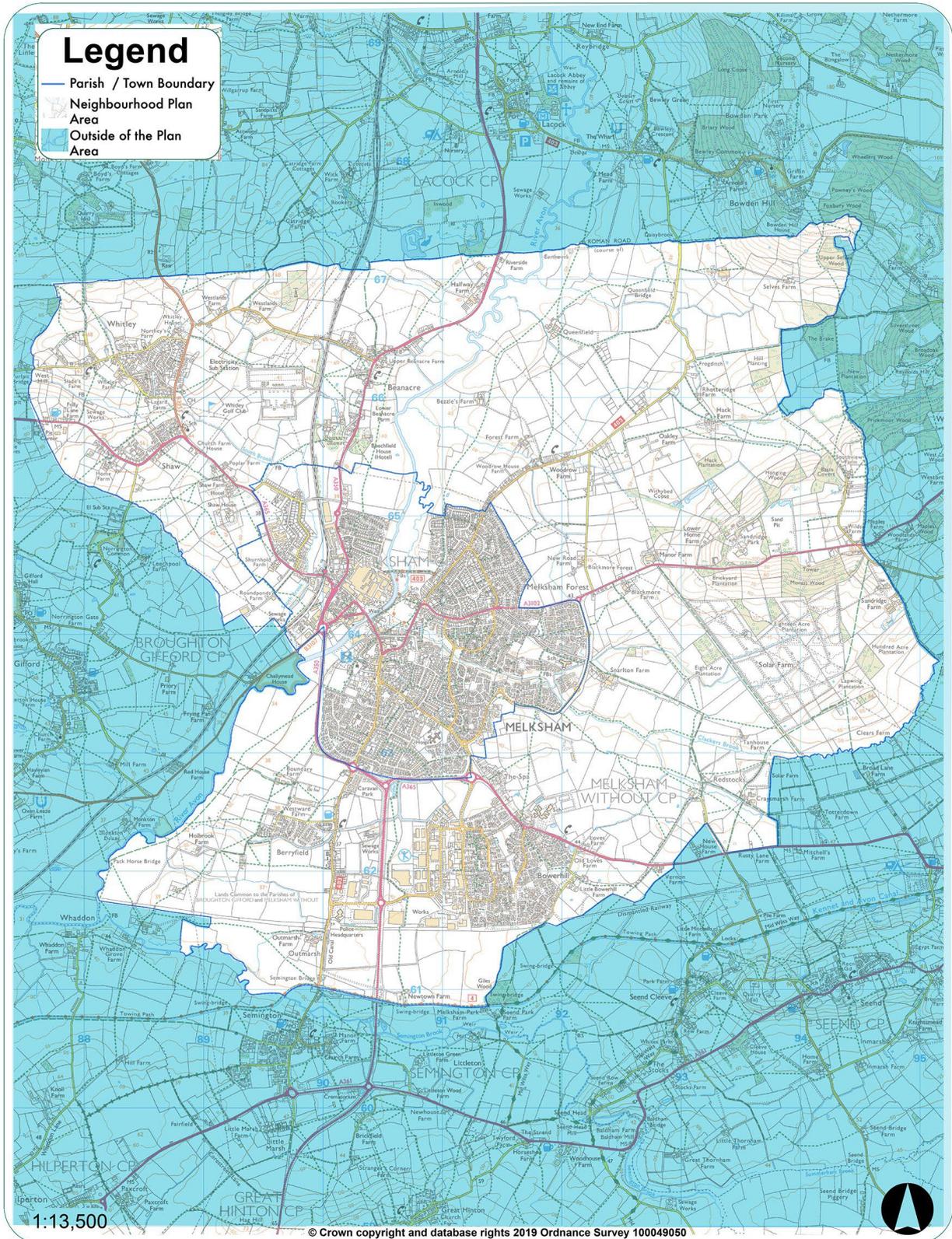
¹ Available at <https://www.gov.uk/guidance/neighbourhood-planning--2#basic-conditions-for-neighbourhood-plan-to-referendum>

² Available at <https://www.planningportal.co.uk/services/help/glossary/g#green-wedges>

1.3 Overview of Study Area

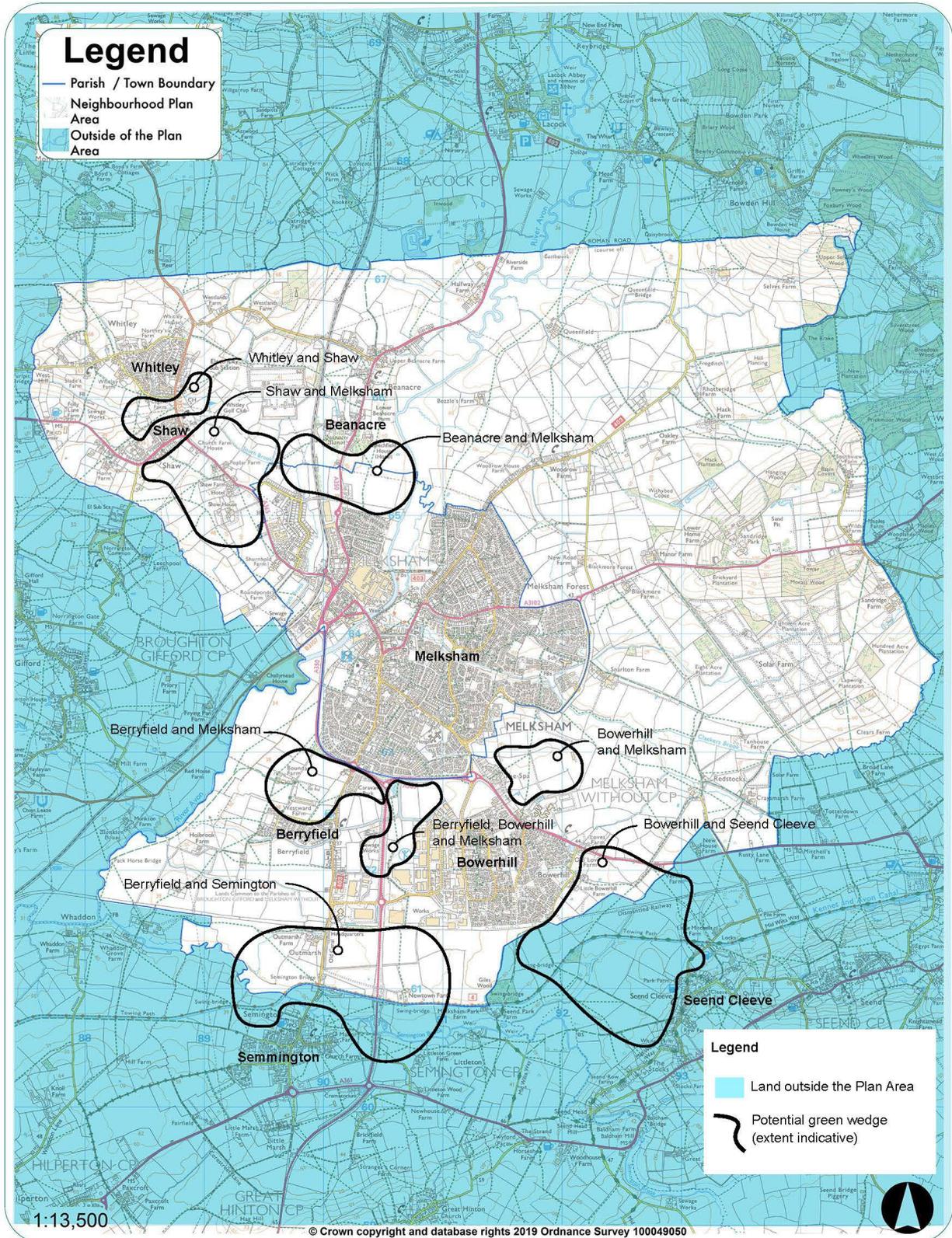
- 1.13 The study area is the JMNP area comprising the parishes of Melksham and Melksham Without. This is illustrated in Figure 1 below. Figure 2 then overlays the base map with the broad locations identified by the Qualifying Body that have potential to be defined as green wedges, for AECOM and Icen Projects to review in detail.

Figure 1: Joint Melksham Neighbourhood Plan Area



Source: Joint Melksham Neighbourhood Plan Steering Group

Figure 2: Broad locations for potential green wedge designation in replacement JMNP



Source: Joint Melksham Neighbourhood Plan Steering Group

2. Policy and Evidence Review

- 2.1 All Neighbourhood Plan policies, including designations and allocations, must be in general conformity with the strategic policies of the adopted Local Plan and should have appropriate regard to emerging Local Plan policies. A number of sources therefore have to be taken into account in order to understand the context for the replacement JMNP and its proposed green wedge designations.
- 2.2 This section sets out relevant national policy, designations, guidance, and evidence, followed by relevant adopted and emerging local development plan policy and evidence. Finally, it sets out some relevant examples of past planning application and appeal decisions.

2.1 National Planning Policy Framework (NPPF)

- 2.3 The NPPF (last revised in July 2021 at the time of writing)³ is the primary document setting out the Government's national policies on planning for England. The NPPF is a high-level document which sets the overall framework for the more detailed policies contained in Local and Neighbourhood Plans. Guidance on how national policies are to be applied is contained in national Planning Practice Guidance (PPG) and other guidance, including that published by bodies such as Natural England.
- 2.4 The terms 'green gap', 'green wedge', or 'coalescence' are not included in the NPPF 2021. However, indirectly, the NPPF offers a sound policy basis for the designation of green wedges in Neighbourhood Plans.
- 2.5 The key paragraphs are as follows:
 - NPPF paragraph 9, which states that:
'.... planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.'; and
 - paragraph 130, which states that:
'Planning policies and decisions should ensure that developments:
...
c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities); and
d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit'.

³ Available at

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf

- 2.6 The key words in these paragraphs are '(local) character', 'history' (including built environment and landscape setting) and 'strong sense of place'. This is because cities, towns and villages each have their own unique character, history and sense of place, which derive in many cases from their built environment and landscape setting, including their status as built-up areas distinguishable from other neighbouring settlements by intervening countryside.
- 2.7 Furthermore, there are a number of planning designations, at both strategic and local level (all outside the JMNP area), which can significantly restrict development and its extent in much of this countryside between settlements. Such designations are typically introduced through Acts of Government, such as the Countryside and Rights of Way Act or the Town and Country Planning Act, and their protection is now enshrined in the NPPF.
- 2.8 The main examples at a strategic level are Natural England designations such as National Parks and Areas of Outstanding Natural Beauty (AONBs)⁴, as well as the (Norfolk) Broads and Green Belts. These designations are mentioned here because there are cases where green gap or wedge policies seeking to restrict development to the same extent or in the same way as in these strategic designations have failed at Examination.
- 2.9 As such, the approach to development in National Parks, the Broads, AONBs and Green Belts (set out in NPPF paragraphs 176, 177 and 137-151 respectively) can be taken as a benchmark when formulating green wedge policy of what to avoid. In other words, the development restrictions set for green wedges should not match or exceed those for these strategic designations. If they did, they would be at high risk of either deletion by the Examiner, challenge from developers and landowners, or both.
- 2.10 At the same time, restrictions greater than those already applying to undesignated open countryside (see NPPF paragraphs 80 and 84c) need to apply, otherwise a green wedge designation would have no effect over and above existing planning policy.
- 2.11 Another type of restrictive designation in the planning system is Local Green Space (LGS). Policy on LGSs is set out in NPPF paragraphs 101-103 and is as restrictive as Green Belts.
- 2.12 While there is no reason why an LGS could not be designated within or instead of a green wedge, the three criteria for LGS designation set out in NPPF paragraph 102⁵ indicate that not every location suitable or appropriate for the designation of a green wedge will also be suitable for the designation of an LGS. LGSs are not the same in policy terms as green wedges because they have differing objectives.

⁴ [Natural England designations programme for areas, sites and trails - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

⁵ Specifically: that the Local Green Space designation should only be used where the green space is: a) in reasonably close proximity to the community it serves; b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and c) local in character and is not an extensive tract of land.

- 2.13 As such, LGSs should not be used as tools to achieve green wedge designation, meaning the potential for any land (whether within or outside the boundaries of a green wedge) to be designated as an LGS in the replacement JMNP is outside the scope of this study.

2.2 National Character Area Profile 117

- 2.14 National Character Areas (NCAs) are defined as follows by Natural England: '[areas with] a unique combination of landscape, biodiversity, geodiversity, history, and cultural and economic activity. Their boundaries follow natural lines in the landscape rather than administrative boundaries'⁶. There are 159 NCAs across England, and each has an NCA Profile, which is a guidance document, developed for it.⁷
- 2.15 The whole of the study area falls within NCA Profile 117, Avon Vales⁸. NCA Profiles are relevant to the study of green wedges because, in the words of Natural England, they '*can help communities to inform their decision-making about the places that they live in and care for....the profiles will also help to inform choices about how land is managed and can change.*'
- 2.16 Under its 'Sense of Place' heading, NCA Profile 117 states '*The NCA has in large part a clear riparian character, which although now influenced by modern development, retains characteristic features such as wetland pastures and wet woodland which are of biodiversity and landscape importance.*'

2.3 Adopted Wiltshire Core Strategy, 2015

- 1.1 The statutory local plan-making authority for the study area is Wiltshire Council (WC). WC's relevant statutory development plan documents include:
- Wiltshire Core Strategy (WCS), incorporating saved policies from District Local Plans (adopted January 2015)⁹;
 - Housing Site Allocations Plan (adopted February 2020)¹⁰;
 - Minerals and Waste policies¹¹; and
 - Made Neighbourhood Plans like the JMNP 2021.
- 2.17 Development plan documents, including local and neighbourhood plans, are able to define green wedges. In Local Plans, unlike in Neighbourhood Plans, such designations can be strategic rather than local in their scale or importance,

⁶ [National Character Area profiles: data for local decision making - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making/national-character-area-profiles)

⁷ A full list of NCA profiles appears at <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making/national-character-area-profiles>

⁸ Avon Vales NCA Profile is available at <http://publications.naturalengland.org.uk/publication/4822288767647744?category=587130>

⁹ [Wiltshire Core Strategy - Wiltshire Council](#)

¹⁰ [Wiltshire Housing Site Allocations Plan - Wiltshire Council](#)

¹¹ [Minerals and Waste - Wiltshire Council](#)

although Local Plans can also designate local gaps. The WCS 2015¹² designates two strategic gaps, between Salisbury and Wilton and between Salisbury and Ford, which are far from the JMNP area and thus have no relevance for the purposes of this study.

- 2.18 While there is no specific WCS policy on strategic or local green gaps or wedges, the closest policies, in terms of supporting the same objectives, are Core Policies CP51 (Landscape) and CP57 (Ensuring High Quality Design and Place Shaping).
- 2.19 CP51 states that: *'proposals will need to demonstrate that the following aspects of landscape character have been conserved and where possible enhanced through sensitive design, landscape mitigation and enhancement measures:*
- ii. The locally distinctive character of settlements and their landscape settings.*
 - iii. The separate identity of settlements and the transition between man-made and natural landscapes at the urban fringe.'*
- 2.20 CP57 states that: *'Development is expected to create a strong sense of place through drawing on the local context and being complementary to the locality. Applications for new development must be accompanied by appropriate information to demonstrate how the proposal will make a positive contribution to the character of Wiltshire through:*
- i. enhancing local distinctiveness by responding to the value of the natural and historic environment, relating positively to its landscape setting and the existing pattern of development and responding to local topography by ensuring that important views into, within and out of the site are to be retained and enhanced*
 - ii. the retention and enhancement of existing important landscaping and natural features, (e.g. trees, hedges, banks and watercourses), in order to take opportunities to enhance biodiversity, create wildlife and recreational corridors, effectively integrate the development into its setting and to justify and mitigate against any losses that may occur through the development*
 - vi.....taking account of the characteristics of the site and the local context to deliver an appropriate development which relates effectively to the immediate setting and to the wider character of the area'.*
- 2.21 Furthermore, in supporting text to CP15 (Spatial Strategy for the Melksham Community Area), the WCS notes in its paragraph 5.83 that the identity of Melksham and Bowerhill as separate communities will need to be preserved through the planning process. Similarly, Berryfield is identified as a small village, and while both Berryfield and Bowerhill have strong functional links to Melksham, they *'have important individual characteristics which should be protected where practicable'*. The policy itself requires development *'to demonstrate how the relevant issues and considerations listed in paragraph 5.83 will be addressed.'*
- 2.22 Collectively, therefore, these policies and supporting text make the WCS theoretically strong in resisting coalescence between settlements in the study area, even while not designating specific strategic or local gaps or wedges.

¹² Available at <https://www.wiltshire.gov.uk/planning-policy-core-strategy>

2.23 However, the ‘presumption in favour of sustainable development’ in NPPF paragraph 11 (sometimes also referred to as the ‘tilted balance’) means that the Core Strategy policies carry less weight in planning decisions in cases where WC cannot demonstrate a five-year supply of deliverable housing sites.¹³

2.24 As WC has been unable to demonstrate a five-year supply of housing sites in recent years, WCS policies limiting development in the countryside have carried less weight than they otherwise would (as is clear from a recent appeal decision within the green wedge between Melksham and Berryfield discussed in detail below). The situation is unlikely to be remedied until a new Wiltshire Local Plan allocating sites for over five years’ worth of housing is adopted.

2.4 West Wiltshire Landscape Character Assessment (2006)

2.25 The West Wiltshire Landscape Character Assessment (LCA) (Chris Blandford Associates, 2006)¹⁴ is an evidence base document¹⁵ which sets out a number of ‘forces for change’ affecting the study area landscape. It notes that *‘the pace of change today is far greater than ever before. Development and other environmental changes are having increasingly visible, cumulative and far-reaching effects on landscape character. These include increasing demands for road transport, new infrastructure and high rates of residential and commercial development.’*

2.26 The most relevant of the ‘forces for change’ identified is ‘built development’. This part of the LCA notes that:

‘As elsewhere in the country, housing development represents a significant pressure for change in West Wiltshire District¹⁶. Continued urban development around the towns have all had impacts on local landscape character. The challenge for the future is to accommodate housing development without eroding local character and distinctiveness.’

¹³ The Qualifying Body will not be surprised to hear that paragraph 11 has become politically unpopular and, as such, changes to the NPPF that would dilute its effect are being consulted on at the time of writing by the Government through the Levelling-up and Regeneration Bill. These changes, if made, could have significant positive implications for policies seeking the designation and retention of green gaps and wedges in any Neighbourhood Plan and the Qualifying Body should monitor progress carefully. For further details, see

<https://www.gov.uk/government/consultations/levelling-up-and-regeneration-bill-reforms-to-national-planning-policy>

¹⁴ Available at https://www.wiltshire.gov.uk/media/9710/West-Wiltshire-Landscape-Character-Assessment/pdf/11102101_Draft_Final_LCA_12-06.pdf?m=637962467303870000

¹⁵ This evidence supported the West Wiltshire Core Strategy and was commissioned by the former West Wiltshire District Council, which has since been replaced by WC. The Wiltshire Core Strategy, adopted in 2015, incorporated and replaced policies from the West Wiltshire District Plan.

¹⁶ The evidence remains relevant for planning purposes despite West Wiltshire District Council no longer existing.

Key forces for change are:

- *Development pressures, particularly for new housing which will affect the character of the existing small settlements - villages may appear to coalesce and suburbanisation may occur.*
- *Isolated development such as new single dwellings that might compromise rural character.*
- *Loss of vernacular architectural features such as old barns and industrial heritage features such as mills.*
- *Modern residential developments in more open locations, some close to the floodplain, have weakened the pattern of tight knit villages in the past.*
- *Pressure for development on main road corridors such as services which are highly visible in more open landscape types.*
- *Pressure for further expansion of settlement and new development along rural lanes threatening the character of the small villages and scattered farmsteads.*

2.27 The West Wiltshire LCA identifies forty Landscape Character Areas within the former district. Those within the study area comprise:

- A3: Broughton Gifford Limestone Lowland, which encompasses the villages of Shaw and Whitley;
- B1: Avon Floodplain, covering land west and north-east of Melksham;
- C1: Melksham Open Clay Vale, covering land east and south-east of Melksham and Bowerhill;
- C2: Semington Open Clay Vale, covering land south and south-west of Melksham and Bowerhill, including Berryfield, and land north of Melksham including Beanacre.

2.28 Table 1 overleaf sets out, in more detail, the LCA conclusions for each of the four Landscape Character Areas found across the study area. For ease of reference, it also includes the broad locations for potential green wedges within each.

Table 1: West Wiltshire LCA conclusions by Landscape Character Area within the study area

Landscape Character Area	Broad location(s) for green wedges within it	Key relevant LCA conclusions
A3 Broughton Gifford Limestone Lowland	Location 1: Whitley and Shaw Location 2: Shaw and Melksham Location 3: Melksham and Beanacre (western half)	<p><i>Summary of Visual Character:</i></p> <p><i>The area has a strong rural character with a mixture of pasture and arable farmland. The small sized, mainly irregular fields are enclosed by generally mature and intact but in places gappy, hedgerows with trees. Views tend to be open with the main notable vertical elements being pylons and hedgerow trees.</i></p> <p><i>Inherent landscape sensitivities:</i></p> <ul style="list-style-type: none"> • <i>Peaceful, rural nature of the area.</i> • <i>The extensive views.</i> • <i>Landscape setting, vernacular character and small scale of the villages</i> • <i>The remaining traditional field pattern.</i> <p><i>Key Landscape Changes</i></p> <ul style="list-style-type: none"> • <i>Pressure for new – linear - developments in and around villages could cause the villages to lose their distinctiveness</i> <p><i>Management Strategy and Objectives</i></p> <p><i>The management strategy for this area is to maintain and conserve the peaceful rural nature of the area with the small villages set in their surroundings of arable and pastoral farmland</i></p>

Landscape Character Area	Broad location(s) for green wedges within it	Key relevant LCA conclusions
B1: Avon Floodplain	Location 6: Melksham and Berryfield (western half)	<p><i>Summary of Visual Character</i></p> <p><i>There is a general sense of openness across the floodplain, however views are often channelled along the river corridor as a result of tall vegetation along the banks. Sense of tranquillity is relatively strong throughout the character area, at distance from the main settlements.</i></p> <p><i>Inherent Landscape Sensitivities:</i></p> <ul style="list-style-type: none"> • <i>Generally peaceful, rural nature of the area, coupled with a relatively strong sense of tranquillity at distance from major settlements.</i> • <i>Overall, rural, generally undeveloped character of the river corridor.</i> <p><i>Management Strategy and Objectives</i></p> <p><i>The overall strategy for the area is to conserve the overall peaceful rural character of the area, including the.....scattered/ isolated settlement pattern. There are also opportunities to enhance the landscape setting of Melksham.</i></p> <p><i>Specific management objectives are to:</i></p> <ul style="list-style-type: none"> • <i>Seek to conserve and maintain the overall rural character of the area and generally strong sense of tranquillity away from major settlements.</i> • <i>Conserve the relatively isolated settlement pattern along the river corridor.</i>
C1: Melksham Open Clay Vale	Location 8: Bowerhill and Melksham (north of A365)	<p><i>Summary of Visual Character</i></p> <p><i>Relatively open and predominantly flat expanse of Open Clay Vale. Occasional drainage ditches are visible at field boundaries. Medium-sized, relatively regular field pattern apparent. Field boundaries are delineated with a mixture of mature hedgerows and deciduous hedgerow trees. However, although predominantly</i></p>

**Landscape
Character Area**

**Broad location(s) for green
wedges within it**

Key relevant LCA conclusions

intact, the hedgerow network is gappy in places. Occasional deciduous copses are scattered throughout the landscape, although these are not a dominant characteristic. Pylons are also visible as dominant vertical elements in certain parts of the character area. The landscape has a strong settled and urbanised feel in proximity to Melksham and Bowerhill (where views to the urban edge are apparent),

Inherent Landscape Sensitivities:

- *Predominantly intact, mature field boundaries and overall intact, coherent landscape pattern.*
- *Open and glimpsed views across the floodplain of the River Avon (adjacent and to the west).*
- *Wide, open skies, with distant views to higher downland.*

Management Strategy and Objectives

The overall strategy for the area is to conserve the intact and recognisable existing landscape pattern and enhance the landscape settings of adjacent urban areas and features that have been lost (e.g. hedgerows). Specific management objectives are to

- *Conserve and enhance the landscape setting of existing settlements/ urban areas (such as Melksham and Bowerhill).*
- *Conserve open views across the clay vale to distant downland ridges.*
- *Seek ways to mitigate the visual impact of the A365 main road corridors.*
- *Conserve and enhance the existing hedgerow network.*

Landscape Character Area	Broad location(s) for green wedges within it	Key relevant LCA conclusions
C2: Semington Open Clay Vale	<p>Location 3: Melksham and Beanacre (eastern half)</p> <p>Location 4: Bowerhill and Seend</p> <p>Location 5: Berryfield, Bowerhill and Semington</p> <p>Location 6: Melksham and Berryfield (eastern half)</p> <p>Location 7: Berryfield, Bowerhill and Melksham (south of A365)</p>	<ul style="list-style-type: none"> • <i>Introduce arable field margins as an important nature conservation feature.</i> • <i>Screen visually intrusive urban edges of Melksham and Bowerhill</i> <hr/> <p><i>Summary of Visual Character:</i></p> <p><i>Overall, there is a strong sense of openness throughout the area, with characteristically extensive views across the vales from certain locations. Sense of tranquillity is, however, disturbed due to proximity to main settlements and major interconnecting road corridors.</i></p> <p><i>Inherent Landscape Sensitivities:</i></p> <ul style="list-style-type: none"> • <i>Open and glimpsed views across open clay vales.</i> • <i>Wide, open skies, with distant views to higher downland.</i> • <i>Mature single trees at field boundaries and within fields.</i> <p><i>Key Landscape Changes</i></p> <ul style="list-style-type: none"> • <i>Visually harsh residential development at the.....edges of Melksham and Bowerhill</i> • <i>Expanding influence of urban areas (urban fringe characteristics)</i> <p><i>Management Strategy and Objectives:</i></p> <p><i>The overall strategy for the area is to enhance the landscape setting of... Melksham and Bowerhill.</i></p> <ul style="list-style-type: none"> • <i>Enhance visually intrusive harsh urban edges of...Melksham and Bowerhill.</i>

**Landscape
Character Area**

**Broad location(s) for green
wedges within it**

Key relevant LCA conclusions

- *Conserve open views across the clay vale to distant downland ridges.*

2.5 Made Joint Melksham Neighbourhood Plan (JMNP 2021)¹⁷

2.29 In 2021, the first JMNP (JMNP 2021) was ‘made’ or adopted. It now forms part of the development plan for the study area and guides planning decisions in the study area, together with the Wiltshire Local Plan and national policy. Its Figure 9 shows designations/features of relevance for the purposes of this study, namely:

- Two green stars between Melksham and Bowerhill (either side of Pathfinder Way) designating Illustrative Important Green Gaps;
- A number of Illustrative Green Infrastructure Corridors (MGI-1-7), of which M GI5 (Kennet and Avon Canal Way) runs between Berryfield to its west and Bowerhill to its east;
- Illustrative Setting of the Kennet and Avon Canal in the gap between Berryfield, Bowerhill and Semington; and
- Shurnhold Fields Country Park in the gap between Melksham and Shaw.

2.30 The conclusions of the JMNP 2021’s Examiner on some of the above designations (as set out in the Examiner’s Report¹⁸), are of relevance to this study. It was the Examiner who recommended that the Important Green Gaps be made ‘*indicative, with a star or similar rather than a size-suggestive blob*’. He also required that what had been called ‘Strategic Green Infrastructure Corridors’ be renamed ‘Indicative Green Infrastructure Corridors’¹⁹ and that each corridor should be ‘*appropriately to their indicative status, exactly the same width across each of their lengths*’.

2.31 Just as for the WCS, although the JMNP 2021 contains a number of policies limiting development outside settlement boundaries (i.e. in the countryside) (specifically Policies 1, 6 and 17), the ‘presumption in favour of sustainable development’ in NPPF 2021 paragraph 11 means that these policies carry less weight in planning decisions for as long as WC is unable to demonstrate a five-year supply of deliverable housing sites.

2.32 Therefore, for the purposes of this report, the JMNP 2021’s policies that limit development in the countryside are likely to carry less weight (as is clear from the recent appeal decision within the green wedge between Melksham and

¹⁷ Available at

https://www.melkshamneighbourhoodplan.org/files/ugd/da341b_a77fec5a6e68413d80560425e1368f24.pdf

¹⁸ Available at

https://www.melkshamneighbourhoodplan.org/files/ugd/da341b_dc0b15857b2349bea392d301e54b1e1b.pdf

¹⁹ In the ‘made’ plan the word ‘Indicative’ has been replaced by the word ‘Illustrative’. For the purposes of this assessment, this change makes little or no difference. Also note the Examiner’s deletion of the word ‘strategic’. This is because planning designations and policies described as ‘strategic’ can only be adopted at Local Plan rather than Neighbourhood Plan level.

Berryfield discussed in detail below). For this reason, they are not reviewed in depth here.

2.6 Local Landscape Character Neighbourhood Plan Evidence Base Report (2020)

2.33 The made JMNP 2021 was supported by an extensive evidence base, which includes a Local Landscape Character Neighbourhood Plan Evidence Base Report.²⁰ The Report is referenced here because its Map 1 is at a much larger scale and therefore provides a far clearer picture of the Landscape Character Areas across the study area originally set out in the West Wiltshire LCA referenced previously. For this reason, Map 1 was a source informing Table 1 of this report.

2.7 Emerging Wiltshire Local Plan

2.34 The emerging Wiltshire Local Plan, which provides the strategy for development in Wiltshire up to 2038, underwent public consultation in January – March 2021²¹. The consultation was on Issues and Options only, rather than on a Preferred Options Draft Plan. Therefore, it did not yet contain any draft policy proposals. Officers are currently reviewing consultation responses.

2.35 WC recently announced, in December 2022, that they intend to update their Local Development Scheme, to include revised timelines for their Gypsies and Travellers Plan and the Wiltshire Local Plan Review, and to reflect an updated plan period to 2038 in response to the consultation and further work being undertaken on housing need and employment evidence. This is signalling a delay of the Local Plan Review, with adoption unlikely in 2023. This is relevant to our study as it means that it is unlikely that WC will be able to demonstrate a five year housing land supply in the near future.

2.8 Planning for Melksham (2021) and emerging Wiltshire Strategic Housing and Economic Land Availability Assessment

2.36 Although the emerging Wiltshire Local Plan will not be adopted until 2024 at the earliest, WC has already produced a range of evidence documents to inform the new Local Plan. The most relevant for the purposes of this study is the 'Planning for Melksham'²² document, which was part of the consultation material for the 2021 Issues and Options consultation.

2.37 The document highlights a number of sites submitted by developers and landowners through a Call for Sites to inform the emerging Wiltshire Strategic

²⁰ Available at

https://www.melkshamneighbourhoodplan.org/files/ugd/2303f3_b229af92e4e14b07a8b3065b1ebe67a1.pdf

²¹ [Local Plan Review consultation - Wiltshire Council](#)

²² Available at https://www.wiltshire.gov.uk/media/5638/Planning-for-Melksham/pdf/WLP_Market_Town_Planning_for_Melksham_FINAL.pdf?m=637938114955330000

Housing and Economic Land Availability Assessment (SHELAA), some of which have implications for potential green wedges across the study area.

2.38 There are so many SHELAA sites that it would be disproportionate to assess them individually here. In any case, their numbers have been boosted by more recent Calls for Sites at the neighbourhood level. However, the locations and extents of both the SHELAA and the Call for Sites returns informed the analysis of broad locations for green wedges. Figure 1 of the Planning for Melksham document provides a high-level overview of broad growth locations across the neighbourhood area, while red-line boundary maps of each individual SHELAA site appear in the document's Melksham Community Area Appendix.²³

2.9 Relevant Planning Appeal Decisions

2.39 This section and the following section set out, for contextual purposes, examples of relevant past planning application and appeal decisions. However, it is important to note that there are, legally speaking, no 'precedents' in planning. In other words, approval of one development cannot be cited as 'precedent' for the approval of another development. This is due to the unique circumstances of each scheme and site, as well as of every plan and plan area, and due to national and local planning documents and planning legislation regularly changing.

2.40 As such, all planning decisions must be considered on their own merits, facts, and circumstances. Nevertheless, past decisions are material considerations for the purposes of planning policy and can contain important information and lessons to be learnt.

2.41 One recent planning appeal decision, within Location 1: Melksham and Berryfield, has particular relevance for this study. The decision dated 30th May 2022 (appeal reference: APP/Y3940/W/21/3285428)²⁴, allowed the development of fifty new dwellings immediately south of Melksham. This has the effect of reducing the extent of separation between Berryfield and Melksham.

2.42 It should also be noted that the application site comprises the eastern half of SHELAA site 728. The site is illustrated in Figure 3 below.

²³ Available at

<https://cms.wiltshire.gov.uk/documents/s149110/SHELAA10SHELAAAppendix59MelksHamCommunityArea.pdf>

²⁴ Available at <https://acp.planninginspectorate.gov.uk/>

Figure 3: Site location of planning appeal decision reference APP/Y3940/W/21/3285428



Source: *Planning Inspectorate, Google Earth*

2.43 In the Inspector's Report, as is standard practice, a wide range of planning matters, including, for example the need for affordable housing, were considered. However, only those conclusions relevant for the purposes of this study are considered here.

2.44 The Inspector considered that coalescence between Melksham, Berryfield, and Bowerhill has already taken place. He noted (paragraph 27) that *'Semington Road includes ribbon development which, on its eastern side extends south from the roundabout with the A350. This appears as an extension to Melksham. Development includes a mobile home park, the recently completed development by Bellway Homes and the recent permission for residential development (20/01938/OUT)²⁵ on a site further south. The net effect of this development is to link with the eastern edge of Berryfields [sic] and in turn to the industrial and commercial estates in Bower Hill [sic] further east.*

2.45 Paragraph 29 continues: *'I do not accept [Wiltshire Council's] argument that the appeal site requires protection from development because it forms a continuous area of land, characteristic of LCA B1. The appeal site is bounded to its west by a strong boundary hedge with mature trees which cut the site of [sic] from wide open views, west to the River Avon. Furthermore, the appeal scheme would retain existing hedgerows which could be strengthened through appropriate*

²⁵ Available at <https://development.wiltshire.gov.uk/pr/s/>. This planning decision is reviewed in more detail below.

landscaping. This is in contrast with the views from the fields further south which are open on their boundary to Berryfield Lane affording long distance views west.'

- 2.46 Later in the report, the Inspector turned to the specific issue of the gap between Melksham and Berryfield, with conclusions as follows (paragraphs 41): *'The Development Plan does not include reference to a strategic gap between Melksham and Berryfield but instead relies on Policy CS51 which seeks to protect landscape character.*
- 2.47 Paragraph 42 states: *'Berryfield is a settlement consisting primarily of post war housing surrounded on 3 sides by open fields. Its eastern side forms part of a continuous area of commercial and residential development which extends along both the A350 and the A365 from the Bowerhill Industrial estate. The Council's recent decision to allow further development on the east side of Semington Road south of Bowood View further undermines Berryfields [sic] identity distinct from Melksham.*
- 2.48 Paragraph 45 continues: *'A clear gap along the west side of Semington Road Westwards [sic] would be retained between the appeal site and the northern edge of the ribbon development which extends from Berryfield. This would be sufficient to maintain the visual links to land to the west, retain separation between the 2 settlements, and allow some degree of transition between man-made and natural landscapes as required by Policy CP51.'*
- 2.49 The Inspector concludes (paragraph 48): *'there are no specific Development Plan policies which seek to protect the Gap between Melksham and Berryfield and the proposed development would not significantly erode it.'*
- 2.50 The Inspector's Report comprises important evidence and can be cited as a material consideration for planning purposes. The key relevant conclusions are as follows: Firstly (paragraph 27), in his judgement, coalescence has already occurred to some extent between Melksham and Berryfield and between Berryfield and Bowerhill. The second key conclusion (paragraph 29) is supportive evidence for the purposes of designating a green wedge between Melksham and Berryfield, where the Inspector concludes that the undeveloped fields south of the appeal site, which would be the most likely location for any designated green wedge, are *'open on their boundary to Berryfield Lane affording long distance views west'* and for this reason are considered less suitable for development than the appeal site.

2.10 Other Relevant Planning Applications

- 2.51 The map-based planning application search site hosted by WC shows a large number of planning applications over the years within the areas that could potentially be designated for green wedges.
- 2.52 Among these, the Qualifying Body and AECOM consider that there are five recent planning applications of particular relevance for this study. Three of these were granted permission, one was refused, and one is still being determined at the time of writing. Furthermore, it is understood that at the time of writing a new application is being prepared for the site where a past application was refused.

2.53 Two of the three applications granted permission were referenced by the Inspector in the appeal decision cited above. The five relevant applications are reviewed below in date order, oldest to most recent.

2.10.1 Application 16/00497/OUT

2.54 As indicated by the first two numbers of its reference code, this application was received by WC in 2016.²⁶ Its site address is 'Land East of Semington Road, Melksham' and the proposal was described as an outline application for the erection of up to 150 dwellings with access, new village hall and areas of open space.

Figure 4: Site location of Application 16/00497/OUT



Source: Wiltshire Council, Google Earth

2.55 The key document setting out WC's response to the application (other than the Decision Notice granting approval for the development) is the Officer's Report to the Strategic Planning Committee, dated 11th May 2016. This sets out the reasons why approval should be granted. Like the Inspector's report for the appeal site reviewed above, Officer's Reports and the Decision Notices they

²⁶ Available at

<https://wiltscouncil.maps.arcgis.com/apps/webappviewer/index.html?id=74a353612a934bd48fee1f2bc564cdd8>

inform are also material considerations for planning purposes and hence can be used as evidence for the purposes of this study.

2.56 The elements of the Officer's Report relevant to this study are as follows:

- The site had been the subject of a previous application in 2014 which had been refused for reasons including the need to avoid coalescence between Melksham and Berryfield.
- However, for this application, WC's landscape officer had no objection, stating that 'the Landscape and Visual Impact (LVIA) report has demonstrated that the visibility of the site within the wider landscape is very restricted and contained by the existing houses along Semington Road and the A350 corridor/ embankment and field boundaries. There are only immediate and occasional views of the site from Semington Road and partial views from Berryfield and PRowS [Public Rights of Way] to the west. As such the landscape and visual impacts are limited to the immediate surroundings and there would be no perceived coalescence between Melksham and Berryfield.'
- The Officer's Report concludes that it has been satisfactorily demonstrated that the proposed development would not result in the visual coalescence of Melksham and Berryfield and that the two settlements would retain their separate identities as required by Core Policies 15 and 51. Therefore the applicants were considered to have overcome the second reason for refusal given in the previous application, and for this and other reasons, the application was granted.

2.57 It is interesting to note the above conclusions in the light of the Inspector's comments on the appeal site, made six years later after the development had been completed. He wholly disagreed in terms of coalescence, specifically pointing to the site²⁷ not only as an example of coalescence between Berryfield and Melksham but also between Berryfield and Bowerhill.

2.58 This shows just how subjective and inconsistent judgements on the issues of gaps and coalescence can be even between planning professionals, emphasising further the value of a policy designating wedges to help promote consistent decision-making.

2.10.2 Application 16/01223/OUT

2.59 This application was also received by WC in 2016.²⁸ Its site address is 'land south of Western Way, Bowerhill' and the proposal was described as 'outline application for residential development of up to 235 dwellings, primary school with early years nursery and open space provision'.

²⁷ Referring to it as 'the recently completed development by Bellway Homes'.

²⁸ Available at <https://wiltcouncil.force.com/pr/s/planning-application/a0i3z000014eieZAAQ/1601123out>

Figure 5: Site location of Application 16/01223/OUT



Source: Wiltshire Council, Google Earth

2.60 The elements of the Officer's Report dated 21st September 2016 relevant to this study are as follows:

- The officer noted that the proposal would jeopardise the individual identity of Melksham and Bowerhill.
- However, the officer concluded that the fact that all public space and drainage provision lies to the north of the proposed housing can be taken as a strategic approach to try and address the policy requirement to retain the separate identities of Melksham and Bowerhill.
- The WC landscape officer stated that while perceived coalescence with Melksham would result, likely landscape and visual effects are not significantly adverse to warrant an objection.
- Part of any landscaping, public art or design strategy should include a 'gateway feature' to reinforce the separate identity of Bowerhill and the northern green buffer should be entirely contained within areas of public open space to ensure longevity.
- Whilst bringing the built form of Bowerhill towards Melksham would erode the sense of openness and physical separation, this also presents an urban design opportunity, through a sensitive approach to design and landscaping, to retain

the separate identities of the two settlements and enhance the identity of Bowerhill in particular; and

- At the time, the JMNP 2021 (which identifies the location as an Important Green Gap) was not yet adopted and therefore significant weight could not be afforded to it.

2.10.3 Application 20/01938/OUT

2.61 This application was received by WC in 2020.²⁹ Its site address is 'land at Semington Road, Melksham' and the proposal was described as 'outline planning permission for up to 144 dwellings with informal and formal open space, associated landscaping and vehicular and pedestrian accesses off Semington Road.' It should also be noted that the application site overlaps wholly with SHELAA site 699.

Figure 6: Site location of Application 20/01938/OUT



Source: Wiltshire Council, Google Earth

2.62 The Officer's Report is dated 27th January 2021. It does not mention coalescence, settlement gaps or wedges in its recommendation to approve the development, despite the fact that the resulting development increases the degree of physical and perceptual coalescence between Berryfield and Bowerhill

²⁹ Available at <https://development.wiltshire.gov.uk/pr/s/planning-application/a0i3z000014evHV/2001938out>

(as was subsequently noted by the Inspector for the appeal decision reviewed above).

2.63 The Officer's Report again accords the then-emerging JMNP 2021 very limited weight, albeit even if it had been adopted at this point, it does not designate the site as an Important Green Gap between Berryfield and Bowerhill.

2.10.4 Application 20/08400/OUT

2.64 This application was also received by WC in 2020.³⁰ Its site address is 'Land south of Western Way, Melksham' and the proposal was an outline application for the erection of up to 231 residential dwellings and a 70-bed care home with associated access, landscaping and open space. It should also be noted that the application site is the same as SHELAA site 1025.³¹

Figure 7: Site location of Application 20/08400/OUT



³⁰ Available at <https://development.wiltshire.gov.uk/pr/s/planning-application/a0i3z000014ex1U/2008400out>

³¹ At the time of writing, a new application has emerged for the same site, namely PL/2022/08504 but this was still being determined at the time this report was completed. Like all applications, it will have to be considered by WC on the basis of its own merits, facts and circumstances. Details are available at <https://development.wiltshire.gov.uk/pr/s/planning-application/a0i3z0000199C49AAE/pl202208504>

Source: *Wiltshire Council, Google Earth*

2.65 The application was refused. The officer's report, dated 7th December 2021, notes the following relevant points:

- The proposal would further erode the remaining buffer between Bowerhill village to the south and Melksham to the north;
- The JMNP 2021 was given full weight in the decision-making process because by the time of the Officer's Report it had been 'made'. The fact that the JMNP 2021 allocated a site for development elsewhere but did not support development here counted in its favour in terms of planning weight attached to it; and
- NPPF paragraph 14 was considered to have been engaged, which unlike for the other three sites, requires WC to demonstrate only a three-year rather than five-year supply of deliverable housing sites, due to the recent adoption of a Neighbourhood Plan.

2.66 It is clear, therefore, that the making of the JMNP 2021 is already having an effect in resisting further speculative housing developments within the study area that have the potential to erode green wedges.

2.67 It is, however, worth noting that the application site is identified as an Important Green Gap in the JMNP 2021 but that this fact was not noted in the officer's report. The only specific policy of the JMNP 2021 cited was Policy 6- Housing In Defined Settlements which (ironically, in the circumstances) specifically resists development at Beanacre and Berryfield but does not mention Bowerhill.

2.68 This highlights the importance of including a specific evidence-based policy (rather than map designation alone) for green wedges in the replacement JMNP, with this report as a key element in that evidence base.

2.10.5 Application PL/2022/08155

2.69 At the time of writing, application PL/2022/08155 has not yet been determined. Its address is given as 'land to the west of Semington Road and the development description is 'outline planning permission for up to 53 dwellings including formation of access and associated works'. It sits to the immediate west of the appeal site reviewed above. It should also be noted that the site covers the western half of SHELAA site 728.

Figure 8: Site location of Application PL/2022/08155



Source: *Wiltshire Council, Google Earth*

2.70 As an Officer's Report has not yet been drafted by WC in response to the application, there is little of relevance for the purposes of this study and it is not possible to determine if the application will be refused or permitted at this point in time. While the fact of the initial refusal for the appeal site (and for 20/08400/OUT) is a material consideration supporting refusal, the fact of the appeal being allowed is a material consideration supporting permission being granted. However, in the round, the application, like all applications, will have to be considered by WC on the basis of its own merits, facts and circumstances.

3. Examples from other Neighbourhood Plans

3.1 Introduction

- 3.1 The detailed review of the policy and evidence relating to green gaps, wedges and/or coalescence in Chapter 2 above strongly supports the case for a policy designating green wedges in the replacement JMNP. In recent years, much development has been allowed to erode the green wedges separating individual settlements in the study area, through a combination of the presumption in favour of sustainable development in the NPPF applying, the technical approach of WC to those applications, and the lack of a made Neighbourhood Plan to resist them at the time.
- 3.2 This chapter next considers how any policy in the replacement JMNP might best be worded and illustrated to maximise the ability to continue resisting speculative development, and what the features or characteristics of the evidence supporting that policy should be. Thirdly the study considers how that policy can be worded in a sufficiently effective way without being so restrictive that it fails Examination.
- 3.3 For this reason, a desktop review of relevant Neighbourhood Plans elsewhere in England was undertaken, including:
 - made Neighbourhood Plans, alongside their relevant Examiner's Report and evidence base, that have defined and designated green gaps or wedges; and
 - Neighbourhood Plans and their relevant evidence, usually but not necessarily made, whose policy or policies for designating green gaps or wedges were deleted or amended at Examination, and the Examiner's Report giving the reason(s) for that deletion.
- 3.4 A detailed online search highlighted eight relevant examples of Neighbourhood Plans meeting the first bullet point criterion above and three examples for the second. While no case studies within Wiltshire were found for either (which would have been particularly helpful in terms of determining the WC approach to such cases), the relevant policy principles nevertheless hold elsewhere.
- 3.5 It should be noted that some Neighbourhood Plans that included or referenced green gaps or wedges did so only to reflect strategic or local gaps or wedges already designated in the relevant Local Plan. While this may not be the case in the study area, because there is no current indication that WC will designate green gaps or wedges of its own, there are still useful points that can be gleaned from these examples.
- 3.6 Detailed reviews of all eleven case-study Neighbourhood Plans are set out below. Where relevant policies or aims were found, their supporting text was also quoted if relevant. The chapter then concludes with a 'lessons learned' section.

3.2 Green Gaps or Wedges in Made Neighbourhood Plans

3.2.1 Battle (Rother)³²

- 3.7 Objective 3 of the Battle Neighbourhood Plan (made June 2021) is to maintain a green gap between the three settlements of Netherfield, Telham and Battle. Policy HD7: Protection of Green Gap states that the Plan designates the area identified in Appendix D as a Green Gap where development will only be supported if it maintains the openness of the area.
- 3.8 The Policy Intent section for HD7 states that: *‘although the land outside the settlement boundaries is already designated as High Weald AONB, which offers policy protection from development and is also protected by being within an area of the highest level of landscape protection, evidence gained through the Parish wide Survey indicates that it is important to protect the strategic gaps to maintain the separate identities of surrounding villages and Battle.*
- 3.9 It continues: *‘the Rother District Council definition of Strategic Gap (SG) is ‘an area of land which helps determine the separation of settlements and protect their individual character’. This Green Gap Policy will afford extra protection from risk of coalescence between Battle and the surrounding villages.’*
- 3.10 Appendix D of the Battle Neighbourhood Plan comprises a Green Gap Analysis. It states that *‘the particular objectives of [a Green] Gap are:*
- a. To maintain the separate identity and distinctiveness between settlements*
 - b. To maintain the strategic settlement pattern*
 - c. To prevent the coalescence of settlements’.*
- 3.11 It continues: *‘The Steering Group analysed and considered the following potential Green Gaps:*
- GG01 Battle north, east of A2100*
 - GG02 Battle north-east, Whatlington Road*
 - GG03 Battle east, Marley Lane*
 - GG04 Telham, A2100 and Telham Lane*
- However, in view of the Examiner’s advice and in discussion with RDC it has been decided to only designate GG03 Battle east, Marley Lane, which fulfils the objective criteria. (The other potential Green Gaps do not fulfil the above objectives, nevertheless the areas covered have extensive protection by virtue of several other RDC and Neighbourhood Plan Policies.)’*
- 3.12 The Examiner’s Report³³ explains that he recommended three of the green gaps be removed because *‘three of these areas could be characterised as almost*

³² Available at <https://rdcpublish.blob.core.windows.net/website-uploads/2021/11/Battle-CP-Neighbourhood-Plan-2019-2028-Referendum-Version.pdf>

³³ Available at <https://rdcpublish.blob.core.windows.net/website-uploads/2021/06/Battle-NP-Examiners-Report-FINAL.pdf>

transitional areas between the built-up areas of the town and the countryside beyond'. He continued: 'the policy refers to the gaps preventing the coalescence of settlements, but in the three cases which I am questioning, I do not consider that development within the proposed green gaps would individually or cumulatively, lead to effective coalescence of the settlements, as there are significant tracts of open land beyond the gaps to protect the separate identity of Battle from Crowhurst and/or Whatlington.'

3.13 The Examiner also noted that:

- *'many of the proposals quoted as examples of pressure for development within the gaps, did not actually support the case for having these gaps. For example, in some cases the site which was being quoted actually lay within the development boundary and was not within the green gap.'*
- *'a gap policy can only protect open undeveloped land.....between two settlements, which if developed would lead to the coalescence of the settlements. It could not be used if the boundary of the gap were to be defined by an administrative boundary, such as a parish council boundary.'*
- *'part of the justification for designation of the green gaps is to protect important views, particularly of the town from the countryside. That objective could have been achieved by the Neighbourhood Plan identifying what are deemed to be important views and establishing a policy framework to protect such views. Such a policy would deliver a similar outcome...'*

3.2.2 Hurstpierpoint and Sayers Common (Mid Sussex)³⁴

3.14 This Neighbourhood Plan was made in March 2015. It uses the term Local Gaps rather than Green Gaps. Some of the parish lies within the South Downs National Park, but none of the Local Gaps it seeks to protect lie within the National Park.

3.15 Its policy Countryside HurstC3 Local Gaps and Preventing Coalescence states: *'Development will be permitted in the countryside provided that it does not individually or cumulatively result in coalescence and loss of separate identity of neighbouring settlements, and provided that it does not conflict with other Countryside policies in this Plan. Local Gaps between the following settlements define those areas covered by this policy:*

- *Hurstpierpoint and Hassocks;*
- *Sayers Common and Albourne;*
- *Hurstpierpoint and Albourne;*
- *Hurstpierpoint and Burgess Hill.'*

3.16 The supporting text to this policy notes that it reflects relevant Local Plan policies. In his Report³⁵, the relevant Examiner noted that *'Mid Sussex Local Plan Policy*

³⁴ Available at <https://www.midsussex.gov.uk/media/2817/hurstpierpoint-and-sayers-common-neighbourhood-plan.pdf>

³⁵ Available at https://www.midsussex.gov.uk/media/3181/hurstpierpoint_and_sayers_common_np_examnation_report.pdf

C3 identifies areas of countryside that are particularly vulnerable to development pressure, but which have an important function with regards [sic] protecting local character.

3.17 It continues: *'Neighbourhood Plan Policy C3 permits development in the countryside, subject to it not resulting in coalescence or the loss of identity of neighbouring settlements. This approach is in general conformity with Mid Sussex Local Plan Policy C3. Further to testing and robust consultation, it reflects the local community's strong support for the vision for the Neighbourhood Area, which seeks to retain a "village feel" and sense of place. This has regard to the Framework, which gives communities direct power to develop a shared vision for their neighbourhood.*

3.18 The Examiner concludes: *'The policy contributes to the achievement of sustainable development by protecting local character and supporting appropriate development. No modifications are proposed.'*

3.2.3 Slinfold (Horsham)³⁶

3.19 Slinfold Neighbourhood Plan was made in June 2018. It contains an anti-coalescence Aim 1, worded as follows: *'Protecting the separate identity of Slinfold is a key community aim of the [Neighbourhood Plan]. It is considered important to ensure the spacing, openness and rural character of the Parish between the Village and the adjoining urban areas are retained and protected. This will be achieved by offering full support to Horsham [District Council] in implementing HDPF Policy 27.*

3.20 The supporting text for the policy states: *'The primary settlement of the Parish is Slinfold Village....the eastern approach to the Village along Lyons Road retains a rural character, bordered by farmland and the River Arun valley to the north, with fields and woodland leading to the Downs Link to the south. One of the distinctive features of the Village is its setting, and visual connectivity with the surrounding countryside. The landscape forms an intrinsic part of the character and setting of the Village and provides informal and formal recreational opportunities for the community. To the east of the Parish is Broadbridge Heath, and beyond this, Horsham. The recent expansion of these areas has involved the housing development and associated infrastructure of Wickhurst Green. This has a substantial urbanising character which has the potential to undermine the rural character of Slinfold Parish, and the rural setting of the Village.'*

3.21 The Aim is supported by an Anti-Coalescence Gap Background Paper³⁷ fulfilling a very similar function to this report. The Background Paper notes the difficulty of defining coalescence when it states *'It is recognised that coalescence does not occur with one single development. It is not the final infill development that joins two settlements that can be attributed with their coalescence, but rather the insidious creep of settlement expansion that occurs over generations.'*

³⁶ Available at https://www.horsham.gov.uk/data/assets/pdf_file/0019/65215/Slinfold-Neighbourhood-Plan.pdf

³⁷ Available at http://www.slinfold-pc.gov.uk/Updates_29715.aspx

- 3.22 The Examiner's Report into the Slinfold Neighbourhood Plan³⁸ called the Background Paper helpful and stated that he supported the maintenance of the gap in principle, noting that this aim was supported by Local Plan policy.
- 3.23 The Examiner stated that the Neighbourhood Plan could have gone even further, noting the potential for it to mention *'the avoidance of urbanising effects within the settlement gap, including artificial lighting; development along key corridors and traffic movements; and the support which would be given to the redevelopment of existing sites which seek to reduce the existing urbanised character and appearance of the area between settlements, particularly along road corridors'*.
- 3.24 However, he noted that because the proposed Neighbourhood Plan policy did not mention these additional points, it overlapped with, but did not restate, the relevant Local Plan policy. As such, it was not in conformity with it, but if it were to be made in conformity, it would simply restate it. He therefore recommended that it be changed into an Aim rather than a Policy.
- 3.25 The Examiner also criticised the boundaries selected for the gap in the Neighbourhood Plan as follows: *'Whereas the eastern and western boundaries shown.....extend along the edge of the respective built-up areas, those to the north and south appear as arbitrary lines across the countryside with little recognition of physical features such as roads or field boundaries. Therefore, in my opinion, in its present form, [it] would be an unworkable tool for development management purposes'*.

3.2.4 Wisborough Green (Chichester)³⁹

- 3.26 Wisborough Green Neighbourhood Plan was made in March 2016. Its policy OA2: Spatial Strategy states that *'The Parish welcomes appropriate sustainable development, which will be permitted providing it complies with the following criteria:.....does not consolidate the local gaps, as these must be kept open (shown in Figure 8) to protect the village form; they mark the gateways to the village and ensure that the settlement does not sprawl along radial routes and impact on the wider countryside.'*
- 3.27 A further policy, OA5 Local Gaps, covers the issue in more detail. Accompanied by the Figure 8 referred to in policy OA2 above, which comprises a clear map of the areas to be designated as Local Gaps, it states:
- 'Development proposed within the local gaps identified in Figure 8 must comply with the following criteria to be acceptable:*
- a. The proposal must not consolidate the local gap by visually and physically reducing the break between the central core and outlying areas.*

³⁸ Available at http://www.slinfold-pc.gov.uk/UserFiles/Files/NP/slinfold_np_final_29_1_18.pdf

³⁹ Available at https://www.chichester.gov.uk/media/26030/Wisborough-Green-Neighbourhood-Plan-for-referendum-March-2016/pdf/Post_Examination_Version_NP_March_2016_final_to_print.pdf

b. The proposal should be accompanied by a landscape and visual impact assessment to demonstrate no diminution in openness and views in the local gap.

c. Proposals should be accompanied by a mitigation plan showing how the local gap can be enhanced by planting and other amelioration.

d. Important trees and hedgerows within the local gaps should be retained as part of any development proposal.

e. Positive community uses of the open areas in the local gaps will be supported where these can enhance visual impact and biodiversity and enhance the range of facilities available.'

3.28 The supporting text to OA5 states: *'Wisborough Green is characterised by green spaces and a feeling of spaciousness; both in the central core and within green gaps which separate the settlement boundary from the peripheral sporadic ribbon development along the main village approach roads. These green gaps (local gaps) are an important feature of the village character. In order to reinforce this local distinctive feature, the....policy applies to those areas shown as local gaps that form a distinct physical and visual break between the village centre and outlying development. The local gaps.....have been included where there is an appreciable feeling of separation between the central village core and the ribbon development.'*

3.29 In his Report⁴⁰, the relevant Examiner has required Figure 8 to be made clearer, as he felt that some of the Local Gaps defined on it had encroached into areas allocated for housing. Otherwise, he had no comment to make on either of policies OA2 or OA5.

3.2.5 Armthorpe (Doncaster)⁴¹

3.30 Policy ANP28 of this Neighbourhood Plan reads as follows: *'Armthorpe's green infrastructure network will be protected, maintained, and where possible enhanced, including Green Wedges, to the north and south of the village as delineated on the Proposals Maps'.*

3.31 The supporting text to the policy reads: *'to reinforce the protection of the countryside, Green Wedges are identified, particularly where development allocations need to be sensitive to strategic rural gaps between settlements. Proposals will be supported which make an overall contribution to the green infrastructure network and the Green Wedge by:*

⁴⁰ Available at [https://www.chichester.gov.uk/media/25436/Wisborough-Green-Neighbourhood-Plan-Examiners-Report/pdf/Wisborough Green Neighbourhood Plan - Chichester District Council 23 11 15.pdf](https://www.chichester.gov.uk/media/25436/Wisborough-Green-Neighbourhood-Plan-Examiners-Report/pdf/Wisborough%20Green%20Neighbourhood%20Plan%20-%20Chichester%20District%20Council%2023%2011%2015.pdf)

⁴¹ Available at <https://dmbcwebstolive01.blob.core.windows.net/media/Default/Planning/Documents/Neighbourhood%20Plans/Armthorpe%20NP/Armthorpe%20Neighbourhood%20Plan%20%E2%80%93%20Adopted%20Version.pdf>

1. *including measures, either on or off site, that are of an appropriate size, shape, scale and type and that have regard to the nature of the proposal and its potential impact;*
2. *contributing to the delivery of identified opportunities and priorities;*
3. *providing for appropriate long term maintenance and management; and*
4. *avoiding damage to or loss of green infrastructure assets or, where loss is unavoidable and the benefits of the development outweigh the loss, including appropriate compensation measures.*

....The identification of areas as being within a Green Wedge would not in itself exempt it from development....Where, however, the Green Wedges overlay development allocations, there will be a requirement that the development must deliver an extensive buffer with an exceptionally high standard of landscaping (to prevent the complete merging of settlements and enhance the amenity and visual appearance of settlement edges), as well as improving access to the countryside, etc. They will thus function as a type of green infrastructure corridor with a focus on landscape and amenity.'

- 3.32 The Examiner's Report for the Neighbourhood Plan⁴² reveals that developers had objected to the scale of the green wedges. Nevertheless, the Examiner considered that the policy could be retained, largely due to its consistency with relevant Local Plan policy, with amended wording. The most significant change he recommended was deletion of the text '*No development shall be permitted within the Green Wedge except as may be allowed by theCore Strategy*' because this was too restrictive.

3.2.6 Cheddar (Sedgemoor)⁴³

- 3.33 Policies BE5 and LEH2 of this made Neighbourhood Plan both resist development on the Green Wedge between Cheddar and the adjacent settlement of Axbridge, whose purpose is defined in the latter policy as being to 'maintain the separation' of the settlements.
- 3.34 Supporting text indicates that the boundaries of the Green Wedge were specifically defined to avoid committed and approved development sites. It also reflects, again, a commitment at Local Plan level to green wedges and strategic gaps.
- 3.35 In his Report into the Neighbourhood Plan⁴⁴, the Examiner noted the purpose of the green wedge was described as '*for leisure, recreation and maintenance of the countryside and preventing built up sprawl*' and protection of the '*western boundary of the village*'.

⁴² Available at

<https://dmbcwebstolive01.blob.core.windows.net/media/Default/Council%20and%20Democracy/Elections/2018/Examiners%20Report.pdf>

⁴³ Available at https://cheddarplan.co.uk/wp-content/uploads/2018/07/Neighbourhood_Plan_2011_-_2027_REFERENDUM_VERSION.pdf

⁴⁴ Available at https://cheddarplan.co.uk/wp-content/uploads/2018/07/Final_Examiners_Report_June_18_Cheddar.pdf

- 3.36 The Examiner further stated: *'Green wedges are not the same as either Green Belts or LGSs, (for example there is no requirement that they should be capable of enduring beyond the end of the plan period) and it is important to remember that different types of designations are intended to achieve different purposes. It is nonetheless also important to ensure that a Green Wedge does not approximate to the creation of a Green Belt (which NDPs cannot do) by another name [or] approximate to the creation of an LGS that departs significantly from government advice and guidance. Particular care should be taken to ensure that designation of an extensive tract of land does not prevent the achievement of sustainable development.'*
- 3.37 He continued: *'The point that the PPG [Planning Practice Guidance] makes about LGSs must also apply to a proposed green wedge: "plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan making".'*
- 3.38 For this reason, the Examiner required the boundaries of the green wedge to be reduced, which would also have the effect of excluding an emerging Local Plan allocation.
- 3.39 In doing so, he also noted reasons why other green wedges would be inappropriate: *'As far as the gap between Cheddar and Axbridge is concerned, for the reasons given above, I consider that there should be Green Wedge (reduced from its original size) to prevent the merger of the two settlements. Draycott, Wedmore and Shipham are more distant and I can see no risk of Cheddar merging with them.'*

3.2.7 Creech St Michael (Somerset West and Taunton)⁴⁵

- 3.40 Again, this Neighbourhood Plan was developed in the context of strategic green wedge designations made in the relevant Local Plan. Its policy CSM10 states that *'Development proposals in the Local Green Wedge identified on Plan 14 (Appendix E) will be resisted where they conflict with its purposes, which are to:*
- Prevent the coalescence of settlements and maintain a sense of place and identity for neighbourhoods;*
 - Maintain the open character of a green lung contributing to health and wellbeing for residents;*
 - Provide accessible formal and informal recreation, sport and play;*
 - Provide valuable wildlife corridors and habitat*
 - Protect areas of landscape importance and visual amenity.'*
- 3.41 The supporting text notes that the key evidence justifying the designation of the green wedge was a Green Wedge Assessment published in 2018. It continues: *'The....Neighbourhood Plan 2016 Survey report confirms significant local support for the protection of this land from development. The Local Green Wedge complements the green wedge extension opportunity established by the Core*

⁴⁵ Available at <https://www.somersetwestandtaunton.gov.uk/media/2017/re01-creech-st-michael-ndp.pdf>

Strategy....Policy CSM 10 seeks to bolster this existing development plan policy.....regard has been had to both national and local policies within the specific Green Wedge Assessment to support this policy.'

3.42 The Green Wedge Assessment⁴⁶ sets out that it examined a range of opportunities across the study area through desk-based assessment and site visits. It notes: *'In considering potential land to be designated as Green Wedge, consideration was given to the following:*

- *Existing land use and its compatibility with a potential Green Wedge use*
- *Comments and suggestions on potential locations taken from consultation on the draft NDP*
- *Consideration of areas of current or future development pressure, taking into account settlement limits and site allocations in the statutory development plan.'*

3.43 The Assessment benefitted from having been able to test each area of search against emerging policy criteria, because policy text had been drafted before assessment started. This differs from the Melksham context. However, given that those criteria covered topics outside the scope of the issue of coalescence or settlement separation, such as wildlife value, the assessment scope may have been disproportionate in any case.

3.44 The Examiner's Report for the Neighbourhood Plan⁴⁷ refers to the green wedge policy as being 'clearly worded'. However, she considered that *'there has been some confusion around the concept and its relationship to green infrastructure or biodiversity issues or whether it is a mechanism for preventing coalescence'*.

3.45 The Examiner continued: *'Coalescence is a recognised planning issue. It is important to prevent neighbouring settlements merging into one another and for local identity and distinctiveness to be reinforced and promoted.....The policy is carefully worded so as not to exclude development per se...as there is not a blanket ban on development, the wording of the policy has sufficient flexibility....In my view, the proposed designation is made validly and logically. Whilst it can always be argued that more or different evidence could be available, the designation takes account of national policy and guidance insofar as reinforcing local identity and distinctiveness are recurring aims of the NPPF, it is in general conformity with the Core Strategy and will help to achieve sustainable development.'*

3.2.8 Rockbeare (East Devon)

3.46 Policy Rock06 of this Neighbourhood Plan states: *'Development proposals in the designated Green Wedge area within the neighbourhood area (shown on map 5) will not be supported unless it can be demonstrated that no harm to the character or purpose of this area will occur and development is:*

- i) for the purposes of agriculture, horticulture or forestry; or*

⁴⁶ Available at <https://www.somersetwestandtaunton.gov.uk/media/1184/7-green-wedge-assessment.pdf>

⁴⁷ Available at <https://www.somersetwestandtaunton.gov.uk/media/2018/re02-independent-examiners-report.pdf>

- ii) development that supports the objectives of the Clyst Valley Regional Park; or*
- iii) within an existing residential or employment site curtilage and iv) proportionate to its location in scale and type.*

- 3.47 The policy supporting text states that the Local Plan has designated the northern part of the parish as a green wedge, whose purpose is to prevent “*creeping development*” that could lead to “*the coalescence of adjacent or neighbouring settlements, villages or towns.....it is important that open land between settlements is retained thus helping them maintain their separate identities, their landscape settings and to avoid the creation of unrelieved development*”.
- 3.48 The Local Plan policy appears to be a strong and popular foundation for the Neighbourhood Plan policy, with up to 98% support in community surveys. Support from neighbouring Aylesbeare, Cranbrook and Whimple Parish Councils is also referenced. The supporting text also ensures a positive approach to development, stating that ‘*whilst isolated new development or incursions into the green wedge area will be resisted, we recognise there may be a need and justification for minor development in the interests of ensuring that existing properties and business within the green wedge can continue to function properly.*’
- 3.49 The Examiner’s Report for the Neighbourhood Plan⁴⁸ examined in depth whether policy Rock06 was more or less restrictive than the Local Plan policy it reflected. The Examiner concluded that it was not, indeed in some regards being more positively worded. He voiced support for the fact that it was not as restrictive as Green Belt policy would be.
- 3.50 He also noted that while the policy had potential to be in conflict with a then-emerging separate Local Plan policy, this did not affect the fact that the policy could meet the Basic Conditions, which require it only to be in general conformity with adopted strategic policy. He also concluded that because the policy did not seek a blanket ban on development within the green wedge, it was in conformity with relevant national policy. The only relevant amendment he made to the policy for Melksham purposes was to ensure it covered only land within the neighbourhood area boundary.

3.3 Green Gaps or Wedges deleted from Neighbourhood Plans

3.3.1 Bray (Royal Borough of Windsor and Maidenhead)

- 3.51 A proposed green gap policy in the submission Bray Neighbourhood Plan⁴⁹ was deleted by the Examiner in his Report, dated October 2017.⁵⁰ The key reasons why the Examiner rejected the designation in principle were as follows:
- The proposed green gap was already entirely Green Belt land;

⁴⁸ Available at <https://eastdevon.gov.uk/media/2538844/rockbeare-report-final.pdf>

⁴⁹ Available at <https://www.brayparishcouncil.gov.uk/wp-content/uploads/2012/04/Bray-Parish-Council-Appendix-A-Bray-Parish-Neighbourhood-Plan.pdf>

⁵⁰ Available at <https://www.rbwm.gov.uk/media/1057/download>

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- The policy suggested that development would be supported where it would protect the landscape and environmental qualities of the gap, but the Examiner queried how this could occur and that those qualities had not been set out in detailed, up-to-date evidence;
- The policy was ambiguous because the gap was illustrated on a map as an arrow rather than a specific area with clear, defined boundaries;
- The policy supporting text indicated that the green gap might cover some existing built-up land which would be inappropriate; and
- The policy resisted ‘inappropriate development’ without defining that term.

3.3.2 Ringmer (Lewes)

3.52 Ringmer’s Neighbourhood Plan⁵¹ was examined by the same Examiner as at Bray. His Report⁵² is dated December 2014.

3.53 Policy 5.4 of the submission Neighbourhood Plan sought to designate a green gap where no such policy already existed at Local Plan level. However, the Examiner objected to its restrictive wording, which only allowed development ‘that would preserve the openness, separation and character of the countryside.’

3.54 The Examiner found the wording to be ‘*significantly more onerous than Green Belt policy*’ and that it ‘*would fail to have regard to the national policy presumption in favour of sustainable development.*’ He deleted the policy without suggesting a replacement.

3.3.3 West Clandon (Guildford)

3.55 The Examiner’s Report for West Clandon⁵³ states that Policy 4 of the submission Neighbourhood Plan designates a green gap, but the Examiner did not approve of the policy for two main reasons. Firstly, the land covered by the Gap is already Green Belt. Secondly, in the words of the Examiner, ‘*the Green Gap delineation is so extensive and the development management implications are so great that it is a strategic policy which is inappropriate for the Neighbourhood Plan*’.

3.56 With regard to the development management implications, the Examiner went on to note ‘*the description of the development management criteria....are more restrictive than those normally applicable to the Green Belt and so do not have regard to national guidance and do not generally conform with [the Local Plan]. Therefore, I recommend that clauses (i) and (ii) are deleted*’.

3.57 The Examiner concluded by recommending that the deleted clauses be replaced by the following new text: ‘*Subject to the exceptions provided by [Local Plan policy], development proposed which would result in significant or cumulative*

⁵¹ Unfortunately, the submission version of the Neighbourhood Plan is not available online.

⁵² Available at <https://www.lewes-eastbourne.gov.uk/resources/assets/inline/full/0/258936.pdf>

⁵³ Available at [https://www.guildford.gov.uk/media/33874/West-Clandon-NDP-Examiner-Report-201021/pdf/West_Clandon_NDP_Examiner_Report_201021.pdf?m=637717024618000000](https://www.guildford.gov.uk/media/33874/West-Clandon-NDP-Examiner-Report-201021/pdf/West_Clandon_NDP_Examiner_Report_201021.pdf?m=63771702461800000)

erosion of the separation of West Clandon and other settlements and the protected views in Appendix 2 will not be supported.

3.58 Map 4 in the submission version of the Neighbourhood Plan⁵⁴ is of interest in showing the size of the proposed green gap that the Examiner considered was of a strategic scale and thus not appropriate for a Neighbourhood Plan. Cross-referencing Map 4 with Google Earth indicates that the proposed gap was approximately 423 hectares in size.

3.4 Summary of lessons learned from example Neighbourhood Plans

3.59 As this chapter makes clear, there is an extensive amount that can be learnt and applied from Neighbourhood Plans across the rest of England when considering parameters and approach in policy terms to potential green wedges in the JMNP area.

3.60 This section comprises a bullet-point summary of what AECOM considers, based on knowledge and experience of neighbourhood planning, to be the most important lessons learnt from example Neighbourhood Plans. These are aimed at informing effective policies on green wedges in the emerging JMNP that can meet the Basic Conditions and thus pass Examination.

3.61 This summary was drafted ahead of the site visits undertaken as part of the study. Therefore, assessors in the field already had a broad idea of what might be possible or desirable in evidence and policy terms before surveying the land to which the policy might apply. This was helpful in informing, guiding, and focussing the site visits and the conclusions of post-visit analysis.

3.62 Based on examples of Neighbourhood Plans made elsewhere, it is considered that any green wedges policy in the emerging JMNP should be informed by the following key points:

- **Many Neighbourhood Plans that designate green gaps or wedges do so in a context where there are already restrictive policies at a higher level, such as Green Belt, AONBs, or green gaps / wedges in the Local Plan.** Logically, green gaps and wedges appear most necessary at Neighbourhood Plan level where no higher-level policy protection already exists, as is the case at Melksham. However, this point does indicate that at Melksham, detailed reference to relevant WCS policy and supporting text (see our Chapter 2) is important to include in supporting text, because it provides a key justification supporting the JMNP policy, informing policy aims as well as demonstrating conformity with the adopted development plan.
- **Examiners attach significant weight to evidence of community support for green wedge policies.** If evidence of such support does not already exist for the emerging JMNP, it should be very easy to produce, given the likely popularity of the policy among local residents. That evidence should be clearly referenced (alongside technical evidence, such as this report) in the supporting text as justification for the policy.

⁵⁴ Available at <https://guildford.inconsult.uk/WCNP21/consultationHome>

- **Land within green wedges should specifically exclude existing built-up areas** (particularly if within settlement boundaries) **or land with permission for residential/commercial development** even if not yet developed or still under construction. Any built development within the wedge should comprise only uses permissible in the countryside, i.e. agricultural buildings such as farms and their barns.
- **Justification text supporting the case for the green wedges should reference evidence of development pressure within them.** Alongside this, it would also be appropriate to provide more general evidence of development pressure across the study area as a whole (indicating that the green wedges are not being designated with the general objective of hindering development, given that the majority of the land being promoted for development across the JMNP area is outside their boundaries). In this context, it would also be relevant to mention the sites developed in recent years contrary to WCS policy because WC was unable to demonstrate a deliverable five-year supply of housing sites.
- **The precise boundaries of green wedges designated by the policy could be supported by evidence of important views** (from publicly accessible locations), of towns/villages from countryside and vice versa. Such views could be identified through a site visit exercise. Boundaries should seek to follow features on the ground, such as roads or field boundaries, rather than straight lines. This will make the policy easier to understand and apply.
- **The term coalescence can and should be used in the policy and/or supporting text but needs careful definition.** Developments can contribute to coalescence both individually and cumulatively, so both adverbs should appear, to ensure the definition is sufficiently clear and hence make the policy effective and clear to use and apply.
- **The evidence supporting the policy⁵⁵ should consider the physical characteristics of each green wedge, explaining key landscape features** (and existing development such as farm buildings, if relevant) **and how those features contribute to preventing coalescence.** Such evidence can help support correspondingly stronger and broader policy text seeking to resist 'urbanising influences' (such as artificial lighting, new kerbs or roadside development like petrol stations) or built development itself in the green wedges.
- **The policy should be positively worded and support development to a greater extent than would AONB or Green Belt policy.** In both cases this helps to minimise the chances of the policy being challenged for being overly restrictive or amounting to a blanket ban on development. It should therefore include positive phrasing such as 'Development will be supported where it....'. Restrictions on development will also have to be significantly less onerous than Green Belt/LGS policy (which effectively allows no development that would compromise the openness of land) or National Park/AONB policy (which effectively prohibits 'major development' in most circumstances). Terms whose meaning is not clear but not defined (such as 'inappropriate development') should

⁵⁵ In the case of the JMNP, the evidence is this report itself.

be avoided. Whatever the restrictions imposed⁵⁶, the easiest and clearest way to do so is likely through a criteria-based policy (i.e. lettered clauses, each with one criterion that the development must meet in order to be supported). A further way to ensure positivity is through the highlighting of opportunities within the gaps or wedges (e.g. for leisure).

- **The supporting text, and potentially the policy, should use the language of national policy on local character and identity.** This will make the policy stronger in a context where green wedges and coalescence are not clearly defined nationally.
- **Clear mapping should be provided alongside the policy.** This will allow all plan users to easily understand the locations and extents of the green wedges designated. The boundaries of each wedge should not be blurred or indicative; to do so would be to weaken the policy. Any attempts, like that of the Examiner at the first JMNP, to introduce deliberate ambiguity to the mapping by substituting indicative symbols like green stars for specific boundaries can be more easily resisted once there is a firm technical and consultation evidence base supporting the boundaries selected. Figure 8 of the Wisborough Green Neighbourhood Plan is a helpful benchmark for clear mapping.
- **The topic of green wedges and avoiding coalescence should be kept separate from any other related policy areas⁵⁷.** This will promote clarity, and hence effectiveness. Overlaps should be avoided with policies on related topics such as green infrastructure, biodiversity, housing design or general landscape policies. This should maintain the focus purely on avoiding coalescence and respecting the setting, local character, and identity of free-standing settlements. The only existing planning designation directly related to the issue is (Local Plan-level) settlement boundaries⁵⁸.
- **The policy should be proportionate in the number and extent of wedges to be defined,** recognising this approach in the review of other example Neighbourhood Plan policies. Most other policies designate only one location as a green wedge. Even where many are designated (such as at Wisborough Green) their extents are proportionate to the scale of the settlements they separate. In terms of extent, West Clandon was an example of where a proposed gap was considered disproportionately large relative to the size of the village. The relatively larger size of settlements in the study area, particularly Melksham

⁵⁶ The specific restrictions should reflect the JMNP context as determined through site visits and desktop policy/evidence review alongside the consultation and other technical evidence (including comparable other Neighbourhood Plan policies and their success or otherwise at Examination).

⁵⁷ With the exception of the point on opportunities for activities within them (e.g. leisure, landscaping, biodiversity) made previously.

⁵⁸ For those applying within the JMNP area, see Wiltshire Housing Site Allocations Plan Appendix A: North and West HMA Part 2 Amended Settlement Boundaries (February 2020) at https://www.wiltshire.gov.uk/media/4550/Wiltshire-Housing-Site-Allocations-Plan-Appendix-A-North-West-HMA-Part-2/pdf/Wiltshire_Housing_Site_Allocations_Plan_Appendix_A_North_West_HMA_Part_2.pdf?m=637347432799270000

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and Bowerhill, should, however, allow for proportionately larger areas to be designated as gaps or wedges.

- **Attempts to designate green wedges that extend across parish boundaries should be avoided**, as this would not be possible at neighbourhood level. In the case of JMNP, this applies to Locations 4 and 5, because Seend and Semington are outside its area. There are no examples of cross-boundary gaps or wedges in other made Neighbourhood Plans except for where they reflect the extents of gaps or wedges already designated at Local Plan level that lie within their area. As such, such locations could only be designated as either local or strategic wedges at Local Plan level.

4. Assessment of individual locations

4.1 Introduction

- 4.1 Green wedges preserve the physical and visual separation of settlements. As such, their designation is based on the spatial function that land between settlements provides, rather than a recognition of landscape quality or value that might arise from the condition, beauty, or services (such as ecological or recreational) provided by the landscape.
- 4.2 Eight potential green wedges were identified, in consultation with Melksham Town Council and Melksham Without Parish Councils, based on their perceived role in providing separation between settlements which is considered to be threatened by development pressure. Table 2 lists the areas identified for consideration in this report. The location of the areas is shown on Figure 2.

Table 2: Potential locations for Green Wedge designation

Potential location for Green Wedge	Locational context
Whitley and Shaw	Whitley and Shaw are, in physical terms, two separate villages. The potential green wedge would act to retain the rural setting of each village and their respective identities. Three SHELAA sites (1023, 3246 and 3459) are located between the two settlement boundaries.
Shaw and Melksham	Shaw is a small village beyond the edge of Melksham. The potential green wedge would act to retain the rural setting of Shaw, preventing its coalescence with Melksham; particularly important here as there is significant intervening countryside development between the two settlements. Four SHELAA sites (187, 2089, 3177 and 3651) are located between the two settlement boundaries.
Melksham and Beanacre	Beanacre is a small village beyond the edge of Melksham. The potential green wedge would retain its rural setting and help preserve the setting of the village. Three SHELAA sites (3243, 3405 and 3746) are located between the two settlements and outside the Melksham settlement boundary.
Bowerhill and Seend Cleeve	The potential green wedge would protect the settings of Bowerhill and Seend Cleeve, retaining their identity as separate settlements, but would cross the parish boundary between Melksham Without and Seend. Four SHELAA sites (1035, 1036, 3331 and 3345) are located outside the Bowerhill settlement boundary but within the JMNP Neighbourhood Area, all south of the A365.
Bowerhill and Semington	The potential green wedge would protect the settings of Bowerhill and Semington, retaining their identity as separate settlements, but would cross the parish boundary between

Melksham Without and Semington. Six SHELAA sites (1003, 1004, 1005, 1006, 1019 and 1024) are located within this area outside the Bowerhill settlement boundary but within the JMNP Neighbourhood Area, on both sides of the A350.

Melksham and Berryfield	A degree of coalescence between Melksham and Berryfield has already occurred along the eastern side of Semington Road. The potential green wedge would prevent further coalescence by protecting land west of Semington Road, within which there are six SHELAA sites outside the Melksham settlement boundary (728, 3105a, 3105b, 3105c, 3105d and 3645).
Between Berryfield, Bowerhill and Melksham (south of A365)	Some coalescence has occurred between Bowerhill and Berryfield, along Semington Road. Similarly, coalescence is beginning to be perceptible between Melksham and Bowerhill around the A365 Western Way roundabout. However, the settlement boundaries for Bowerhill and Melksham indicate that separate identities for all three settlements remain. The potential green wedge would act to safeguard the remaining open land between the settlements, preventing further coalescence. One SHELAA site (1025) and two Call for Sites submission sites (MEL04 and MEL06), all outside the Bowerhill and Melksham settlement boundaries, are found here.
Bowerhill and Melksham (north of A365)	Bowerhill and Melksham retain separate settlement boundaries, but the countryside between them to the north of the A365 has been reduced in extent by recent housing developments. The potential green wedge would retain a sense of separation between the two areas. Three SHELAA sites outside the Bowerhill and Melksham settlement boundaries (1034, 3219, 3249) are found here.

4.2 Methodology

- 4.3 Each potential green wedge was assessed against the following three criteria to determine its suitability for designation.

4.2.1 Criterion 1: Settlement character

- 4.4 A green wedge defines land between settlements of distinct character. As such it is necessary to analyse each of the two (or more) settlements adjoining each potential green wedge to determine its key characteristics relative to the one or more settlements on the other side of the potential green wedge.
- 4.5 The following list identifies considerations to be used in this process:
- Do the settlements have distinct origins/history?
 - Do land uses differ by settlement?
 - Are building typologies distinctive by settlement- for example, prevailing building heights, massing, scales or materials?

- Is the perceptual quality of the townscape different by settlement, e.g. the level of tranquillity or activity?
- Does each settlement hold distinctive cultural associations?

4.6 The review of settlement character is based on desktop research, including review of historic maps, OS maps, aerial imagery and published character assessments, including the Melksham Neighbourhood Plan Rapid Community Character and Distinctiveness Statement, 2020⁵⁹ prepared as part of the evidence base for the first Neighbourhood Plan.

4.2.2 Criterion 2: Green wedge character

4.7 Green wedges provide a physical separation between built-up settlements; in other words, they are recognisable as open countryside, largely free from development. As such, each potential green wedge was analysed against the following criteria:

- Is there a clear edge between the countryside and its adjacent settlements?
- To what degree is there intervisibility between the countryside and the adjacent settlement?
- To what extent is there existing development within the countryside, other than for uses permissible in planning terms here (i.e. agriculture, forestry and horticulture)?
- Is the countryside generally open, thus allowing perception of separation between settlements?
- Do people travelling between the settlements (on road, foot or rail) have a sense of leaving one settlement, traversing countryside, and then arriving in the second settlement?
- Can the boundary of the potential green wedge be drawn using physical features identifiable on the ground (e.g. hedgerows, roads, rail lines)?

4.2.3 Criterion 3: Planning considerations

4.8 The review of national and local policy in Chapter 2 and of green gaps and wedges from elsewhere in Chapter 3 demonstrated the characteristics of green wedges that might meet the Basic Conditions of neighbourhood planning. A number of those characteristics are already included in criteria 1 and 2. Those remaining are listed below, and thus should be considered through criterion 3:

- Are there sites with planning permission for residential or commercial development, whether or not construction has started? Such sites should be considered existing settlements for planning purposes⁶⁰ and thus not included in the potential green wedge.

⁵⁹ Available at:

https://www.melkshamneighbourhoodplan.org/files/ugd/da341b_e73a84f04c544e28b803b1844af13825.pdf

⁶⁰ Even if the settlement boundary has not yet been updated to include them within the settlement of which they form a part.

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- Is the potential green wedge entirely within the Neighbourhood Area? If not, it cannot be designated at neighbourhood plan level, only at Local Plan level (assuming the potential green wedge does not also extend beyond Local Plan area boundaries)
 - Is there known intention to develop outside current settlement boundaries within the potential green wedge? This may be evidenced by recent planning applications and/or the presence of SHELAA and Call for Sites submission sites. Where such intention can be demonstrated, it increases the justification for wedge designation.
- 4.9 The remainder of this chapter comprises a location-by-location assessment of the potential for designating green wedges based on consistent application of the three criteria set out above.

4.3 Location 1: Whitley and Shaw

Table 3 Evaluation of green wedge between Whitley and Shaw

Criterion	Evaluation	Conclusion
1: Settlement Character	<p>Whitley and Shaw are both within LCA A3 which notes the “<i>Landscape setting, vernacular character and small scale of the villages as a key characteristic</i>”, and notes that “<i>pressure for new – linear - developments in and around villages could cause the villages to lose their distinctiveness</i>”.</p> <p>Both the northern edge of Shaw and the southern edge of Whitley comprise 20th century residential buildings. However, the two settlements exhibit different characters, as set out below. The settlements are also perceived to be distinct from one another by the local community, as set out in the Rapid Community Character and Distinctiveness Statement⁶¹.</p> <p>Whitley comprises a nucleated settlement, mostly set between the B3353 to the east, First Lane to the west, and Top Lane to the north. Building typology varies across the village, including historic farm houses, two storey houses and chalet bungalows. Houses typically comprise natural stone facades and red tile roofs. Mature vegetation borders the roads on the boundary of Whitley, typically limiting intervisibility with the wider landscape.</p> <p>Shaw is a linear settlement, focussed on the northern side of Shaw Hill, typically affording open views of the surrounding landscape to the south. Natural stone characterises the local material palette used for boundary walls and houses, which are typically detached and set back from the road behind boundary walls and hedgerows, interspersed by mature deciduous trees. Christ Church, located east of Corsham Road, comprises a prominent feature and local landmark.</p>	<p>The character of each settlement is considered sufficiently distinct to identify as two separate settlements.</p>

⁶¹ https://www.melkshamneighbourhoodplan.org/files/ugd/da341b_e73a84f04c544e28b803b1844af13825.pdf

Criterion	Evaluation	Conclusion
2: Green wedge character	<p>The green wedge is bisected from east to west by South Brook. An overhead line extends along the same orientation. (Photograph 1)</p> <p>Both settlements exhibit a clear boundary fronting onto the green wedge. The southern edge of Whitley is contained by First Lane. Vegetation south of First Lane softens the appearance of houses from the green wedge (Photograph 2). Lagard Farm extends south of the road, but this is not incongruous with the green wedge, given the farm’s agricultural use and character. Shaw’s northern boundary is formed by the rear of properties on Beeches Green and the rear of Mavern House, accessed off Corsham Road.</p> <p>The gap between the two settlements measures c. 160m at its narrowest point. Mature trees flanking the brook and hedgerows on the edge of each settlement substantially limit intervisibility between the two settlements.</p> <p>The green wedge is free from buildings. The perception of the green wedge is strengthened by the open landscape to the east and west, accessible via local footpaths. As such, the green wedge reads as part of the wider countryside, thereby providing a rural setting and separation to each village.</p> <p>The clear edge to each village and intervening field boundaries provide physical features along which the boundary of the green wedge can be drawn.</p>	<p>The character of the green wedge is sufficiently open to separate the two settlements.</p>
3: Planning considerations	<p>No sites within the green wedge are known to have received planning permission.</p> <p>The green wedge is entirely within the Neighbourhood Area.</p> <p>SHELAA sites are located between the two settlements (see Table 2 for details), indicating likely development pressure.</p>	<p>The green wedge is appropriate to be defined as such in terms of this criterion.</p>

4.10 The green wedge is found to provide physical and perceptual separation between the two villages and is therefore recommended for designation in the Neighbourhood Plan .

Figure 9: Recommended green wedge between Whitley and Shaw



Source: Google Earth

4.11 Figure 9 shows the extent of the recommended green wedge. The northern boundary is defined by the southern edge of Whitley, comprising First Lane and the southern boundary of Lagard Farm. The eastern boundary follows the western boundary of Whitley Golf Club, thereby including open land immediately east of Corsham Road which contributes to the perception of openness from the highway. The southern boundary follows the northern edge of Shaw. The western edge follows field boundaries between the two settlements. Fields further west are in agricultural use, perceived as part of the wider rural landscape, and therefore beyond the extent of the green wedge.

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Northern edge of Shaw

Approximate alignment of footpath

Overhead lines extending through green wedge

Glimpses of southern edge of Whitley

South Brook



Photograph 1: View of green wedge looking west from Corsham Road



Properties on southern edge of Whitley

Photograph 2: View north to southern edge of Whitley

4.4 Location 2: Shaw and Melksham

Table 4 Evaluation of green wedge between Shaw and Melksham

Criterion	Evaluation	Conclusion
1: Settlement character	<p>Shaw is within LCA A3 which notes the “<i>Landscape setting, vernacular character and small scale of the villages as a key characteristic</i>”, and notes that “<i>pressure for new – linear - developments in and around villages could cause the villages to lose their distinctiveness</i>”. Being a large settlement, Melksham is not included within a landscape character area.</p> <p>Shaw is a linear settlement, focussed on the northern side of Shaw Hill, typically affording open views of the surrounding landscape to the south (Photograph 3). Natural stone characterises the local material palette used for boundary walls and houses, which are typically detached and set back from the road behind boundary walls and hedgerows, interspersed by mature deciduous trees. The village’s southern boundary is well defined, extending along the rear of properties located on Shaw Hill (Photograph 4). The spire of Christ Church is visible on the edge of the settlement, enhancing its historic character and identity.</p> <p>The town of Melksham comprises a varied building typology and vernacular, and a wide range of land uses, including industrial and commercial uses. This results in a high degree of activity, compared to the settled character of Shaw. The north-western edge of Melksham comprises a modern estate built on land east of Bath Road.</p> <p>The settlement boundaries identified by WC identify Melksham as a Market Town, separate to the Large Village of Shaw and Whitley.</p>	<p>The character of each settlement is considered sufficiently distinct to identify as two separate settlements.</p>
2: Green wedge character	<p>Bath Road (A365) bisects the green wedge, broadly running from north to south. The road is typically busy with traffic and flanked by buildings. However, the materials (natural stone), form and layout of these buildings reflect their historic and agricultural character, and therefore the perception that they are part of the wider rural landscape, rather than part of either Shaw or Melksham (in landscape character terms).</p>	<p>The character of the green wedge is sufficiently open to separate the two settlements.</p>

Criterion	Evaluation	Conclusion
3: Planning considerations	<p>West of Bath Road, the green wedge comprises agricultural land with little visibility of the surrounding settlements or perception of Bath Road itself due to strong field boundaries, comprising hedgerows interspersed with trees. Similarly, the northern part of land east of Bath Road comprises agricultural land, whilst the southern part comprises Shurnhold Fields Country Park (Photograph 5), exhibiting a rural and open character. The perception of the green wedge is strengthened by the open landscape to the east and west, accessible via local footpaths. As such, the green wedge reads as part of the wider countryside, thereby providing a rural setting and separation for each village.</p> <p>The boundaries can be clearly identified by physical features, namely development boundaries and field boundaries.</p>	<p>The green wedge is appropriate to be defined as such in terms of this criterion.</p>

4.12 The green wedge is found to provide physical and perceptual separation between Shaw and Melksham and is therefore recommended for designation in the Neighbourhood Plan.

Figure 10: Recommended Green Wedge between Shaw and Melksham



Source: Google Earth

4.13 Figure 10 shows the extent of the recommended green wedge between Shaw and Melksham. The northern boundary is defined by the southern edge of Shaw, comprising the rear of properties located south of Shaw Hill. The eastern boundary includes all of Shurnhold Fields, a public open space. The southern boundary follows the northern edge of Dunch Lane and the northern boundary of Shaw Grange. The western boundary follows field boundaries extending between the two settlements, broadly in line with the western extent of the southern boundary of Shaw to the north and Shaw Grange to the south.



Photograph 3: View south from edge of Shaw

Properties on southern edge of Shaw

Christ Church



Photograph 4: View north towards edge of Shaw

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Bath Road (behind
vegetation)

Christ Church

Shurnhold Fields Country
Park



Photograph 5: View north from edge of Melksham

4.5 Location 3: Melksham and Beanacre

Table 5 Evaluation of green wedge between Beanacre and Melksham

Criterion	Evaluation	Conclusion
1: Settlement Character	<p>Beanacre is within LCA C2: Semington Open Clay Vale. Being a large settlement, Melksham is not within a landscape character area of its own.</p> <p>Beanacre comprises a ribbon settlement along the A350 and Westlands Lane and includes several listed buildings, contributing to the settlement’s historic character. Located on low-lying land close to the River Avon, the built development is typically enclosed by mature woodland, substantially screening views of the settlement from the south. (Photograph 7)</p> <p>The northern edge of Melksham comprises a line of post war housing located on Avon Road and Trent Crescent, as well as commercial buildings including Leekes Department Store and a car garage (Photograph 6). This edge is representative of the wider character of Melksham, comprising a varied vernacular and a range of land uses.</p> <p>The settlement boundaries identified in the Wiltshire Core Strategy identify Melksham as a Market Town. Beanacre is identified as a ‘small village’ so has no settlement boundary.</p>	<p>The character of each settlement is considered sufficiently distinct to identify as two separate settlements.</p>
2: Green Gap Character	<p>The A350 bisects the green wedge. The landform is relatively flat, forming part of the floodplain of the River Avon, promoting a sense of openness. Vegetation east of the A350 is sparse, limited to field boundary hedgerows, emphasising the openness of the landscape.</p> <p>Clumps and belts of woodland occupy land west of the A350, creating a localised sense of enclosure. However, the vegetation flanking the A350 is relatively thin and therefore intervisibility across the road remains. The green wedge is free from built development other than Burnt Cottages, a terrace of four red brick houses fronting onto the A350. Given their small footprint, they are not considered to detract from the function of the green wedge. The southern edge of Beanacre, comprising Beechfield House and Beanacre Manor, is enclosed by woodland (Photograph 7). However, the northern edge of Melksham is relatively open,</p>	<p>The character of the green wedge is sufficiently open to separate the two settlements.</p>

affording visibility of residential and commercial buildings. As a result, the green wedge exhibits an urban fringe character in the south, becoming increasingly rural to the north.

The boundaries can be clearly identified by physical features, namely development boundaries and field boundaries.

3: Planning considerations

No sites within the green wedge are known to have received planning permission.

The green wedge is entirely within the Neighbourhood Area.

SHELAA sites are located between the two settlements indicating likely development pressure (for details, see Table 2). Land west of the A350 was subject to a residential application that was subsequently withdrawn.

The green wedge is appropriate to be defined as such in terms of this criterion.

4.14 The green wedge is found to provide physical and perceptual separation between Beanacre and Melksham and is therefore recommended for designation in the Neighbourhood Plan .

Figure 11: Recommended Green Wedge between Beanacre and Melksham



Source: Google Earth

4.15 Figure 11 shows the extent of the recommended green wedge between Beanacre and Melksham. The northern boundary is defined by the southern edge of Beechfield House's curtilage in the east, and that of Beanacre Manor to the west. The eastern edge is marked by the River Avon. The southern edge is offset from the northern boundary of Melksham, following a field boundary and the edge of commercial development. The western boundary follows the railway line that runs between Melksham and Chippenham.

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Properties on northern
edge of Melksham

Nortree Motor
Company



Photograph 6: View south towards Melksham

Woodland surrounding
Beechfield House



Photograph 7: View north towards Beanacre

4.6 Location 4: Bowerhill and Seend Cleeve

Figure 12: Bowerhill to Seend Cleeve - dashed line indicates area fails to meet criteria for green wedge designation at neighbourhood plan level



Source: Google Earth

- 4.16 Figure 12 shows the extent within the JMNP area of the potential green wedge between Bowerhill and Seend Cleeve. The northern boundary follows Bath Road (A365). The eastern and southern boundaries follow the parish boundary, which comprises field boundaries. The western edge is marked by the easternmost extent of Bowerhill.
- 4.17 Desk based review and field survey found that the two settlements exhibited a distinct character and that the intervening landscape, centred on the Kennet and Avon Canal, was open and provided a rural setting to each settlement, preventing their coalescence. These findings indicated that the green wedge would satisfy criteria 1 and 2. However, the southern extent is forced to follow an administrative boundary rather than the full extent of the functional green wedge, extending into Seend parish. As such, the area does not satisfy criterion 3 and therefore cannot be recommended for designation in the Neighbourhood Plan.
- 4.18 It should, however, be noted that because the land between Bowerhill and Seend Cleeve is considered to provide the function of a green wedge, and because all land is within WC's planning area, the land could be considered for green wedge designation through the emerging Wiltshire Local Plan.

4.7 Location 5: Bowerhill and Semington

Figure 13: Bowerhill and Semington - dashed line indicates area fails to meet criteria for green wedge designation at neighbourhood plan level



Source: Google Earth

- 4.19 Figure 13 shows the extent within the JMNP area of the potential green wedge between Bowerhill and Semington. The northern boundary follows the line of a dismantled railway south of Melksham Police Station. The eastern boundary follows the Semington Bypass (A350). The Kennet and Avon Canal, which is also the parish boundary, marks the area's southern boundary, whilst the western boundary is defined by a field boundary, part of Outmarsh Farm.
- 4.20 This review found that Bowerhill and Semington exhibit distinct characters, and that the existing land between them is open and prevents their coalescence. However, the southern extent is forced to follow an administrative boundary rather than the full extent of the functional green wedge, which extends into Semington parish. As such, the area does not satisfy criterion 3 and therefore cannot be recommended for designation in the Neighbourhood Plan.
- 4.21 It should, however, be noted that because the land between Bowerhill and Semington is considered to provide the function of a green wedge, and because all land is within WC's planning area, the land could be considered for green wedge designation through the emerging Wiltshire Local Plan.
- 4.22 After the draft final stage of this report was completed, Melksham Town Council and Melksham Without Parish Council contacted AECOM with information on the

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proposed next steps for Location 5. These are summarised in Appendix A: Next Steps for Location 5.

4.8 Location 6: Melksham and Berryfield

Table 6 Evaluation of green wedge between Berryfield and Melksham

Criterion	Evaluation	Conclusion
1: Settlement Character	<p>Berryfield is within LCA C2: Semington Open Clay Vale. Being a large settlement, Melksham is not within a landscape character area.</p> <p>Berryfield comprises a number of developments that have been built between 1800 and the present day. There is a wide variety of materials and form, resulting in a diverse architectural vernacular. The core of Berryfield comprises the estates of Berryfield Park, Winston Road and Padfield Gardens, located west of Semington Road and extending at a perpendicular angle towards the River Avon. More recent estates extend along the eastern side of Semington Road. Bowood View, the most recent development east of Semington Road, extends the settlement eastwards, towards the A350. Views from Berryfield to the surrounding landscape, particularly westerly views towards the River Avon and southerly views from the edge of Berryfield Park and Berryfield Lane, provide a green setting and semi-rural character to the settlement.</p> <p>The southern edge of Melksham is defined by the A350, which forms a line of severance in the landscape, dividing Melksham from the wider rural landscape to the south. As a result, the houses on the southern edge of the town relate principally to the wider townscape to the north.</p> <p>The settlement boundaries identified in the Wiltshire Core Strategy identify Melksham as a Market Town. Berryfield is identified as a 'small village', so has no settlement boundary.</p>	<p>The character of each settlement is considered sufficiently distinct to identify as two separate settlements.</p>
2: Green Wedge Character	<p>The green wedge comprises flat agricultural fields defined by hedgerows interspersed with trees.</p> <p>The green wedge is free from residential development. Agricultural buildings associated with Westward Farm, accessed off Berryfield Lane, occupy the centre of the area. The area promotes a sense of openness, resulting from the limited built form and relatively low field</p>	<p>The character of the wedge is sufficiently open to separate the two settlements.</p>

Criterion	Evaluation	Conclusion
	<p>boundaries, and marks a transition from the surrounding settlements to the wider rural landscape. Similarly, the absence of access roads leading into the green wedge, other than the agricultural tracks identified above, contributes to its rural character.</p> <p>The more recent developments located on Semington Road are visible from within the green wedge. The edge appears relatively uniform, following the alignment of Semington Road. The older estates, extending west from Semington Road, are mostly screened by a mature hedgerow on Berryfield Lane. There is almost no intervisibility with Melksham, given the screening effect of intervening field boundaries.</p> <p>The boundaries can be clearly identified by physical features, namely development boundaries and field boundaries.</p>	
3: Planning considerations	<p>No sites within the green wedge are known to have received planning permission. The northern boundary follows the edge of the development site west of Semington Road which was allowed on appeal in 2022.</p> <p>The green wedge is entirely within the Neighbourhood Area.</p> <p>The green wedge would protect land west of Semington Road, within which there are five SHELAA sites. An application for 53 dwellings has also been submitted (PL/2022/08155), but as this had not been determined at the time of writing, it is for the moment appropriate to include within the wedge. If the development is consented before the green wedge is designated in a made replacement JMNP, then the boundaries of the wedge would have to change to exclude it.</p>	<p>The green wedge is appropriate to be defined as such in terms of this criterion.</p>

4.23 The green wedge is found to provide physical and perceptual separation between Berryfield and Melksham and is therefore recommended for designation in the Neighbourhood Plan .

Figure 14: Recommended Green Wedge between Melksham and Berryfield



Source: Google Earth

4.24 Figure 14 shows the extent of the green wedge between Melksham and Berryfield. The northern boundary follows the A350 and the boundary of a forthcoming residential development west of Semington Road which was allowed on appeal in 2022. The eastern boundary broadly follows Semington Road and the boundaries of development lining the road. The northern extent of Berryfield forms the southern boundary, whilst the western boundary is formed by field boundaries.

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Agricultural buildings Visual connection to the wider rural landscape



Photograph 8: View west from Semington Road

Houses on western side of Semington Road

Houses on Berryfield Lane



Photograph 9: View east towards Berryfield

4.9 Location 7: Berryfield, Bowerhill and Melksham

Table 7 Evaluation of green wedge between Berryfield, Bowerhill and Melksham

Criterion	Evaluation	Conclusion
1: Settlement Character	<p>Berryfield is within LCA C2: Semington Open Clay Vale. Melksham and Bowerhill are not within an LCA.</p> <p>The eastern edge of Berryfield comprises agricultural fields and recent residential development; however, this edge is separated from the green wedge by the A350 which forms a line of severance in the landscape, preventing any physical or visual connection.</p> <p>The southern edge of Melksham comprises post-war housing estates, bounded by Western Way (A365). The western edge of Bowerhill mostly comprises an industrial estate, characterised by eight large sheds which are converted from former RAF hangars. Each of the three settlements exhibit different land uses and/or building typologies, leading to distinct townscape characters.</p> <p>The settlement boundaries identified in the Wiltshire Core Strategy identify Melksham and Bowerhill as separate settlements. Berryfield is identified as a ‘small village’, so has no settlement boundary.</p>	<p>The character of each settlement is considered sufficiently distinct to identify as two separate settlements.</p>
2: Green wedge character	<p>The green wedge comprises flat fields defined by hedgerows interspersed with hedgerow trees.</p> <p>There is little to no intervisibility between the green wedge and the surrounding settlements. The green wedge acts as an open corridor of undeveloped land extending from the southern edge of Melksham to the wider rural landscape south of Bowerhill, experienced as people move along the public right of way network. As such, the area contributes to the character of the settlements at a local level, maintaining their connection to the wider landscape.</p> <p>Whilst motorists driving on the A350 and A365 experience very few direct views of the green wedge, the lack of development is evident by the absence of road accesses connecting to the highway and fleeting glimpses of the land at field accesses.</p>	<p>The character of the wedge is sufficiently open to separate the three settlements.</p>

Criterion	Evaluation	Conclusion
3: Planning considerations	<p>The green wedge boundary can be clearly identified by physical features, namely the edge of settlements and field boundaries.</p> <p>No sites within the green wedge are known to have received planning permission.</p> <p>The green wedge is entirely within the Neighbourhood Area.</p> <p>SHELAA and Call for Sites submissions are located in this area (for details, see Table 2). A recently refused residential application (20/08400/OUT) is also located within the area; all demonstrate development pressure here.</p>	<p>The green wedge is appropriate to be defined as such in terms of this criterion.</p>

4.25 The green wedge is found to provide physical and perceptual separation between Berryfield, Bowerhill and Melksham and is therefore recommended for designation in the Neighbourhood Plan .

Figure 15: Recommended Green Wedge between Berryfield, Bowerhill and Melksham



Source: Google Earth

4.26 Figure 15 shows the extent of the green wedge between Berryfield, Bowerhill and Melksham. The northern boundary follows A365 Western Way. The eastern and southern boundaries follow the residential and industrial edge of Bowerhill. The A350 forms its western edge.

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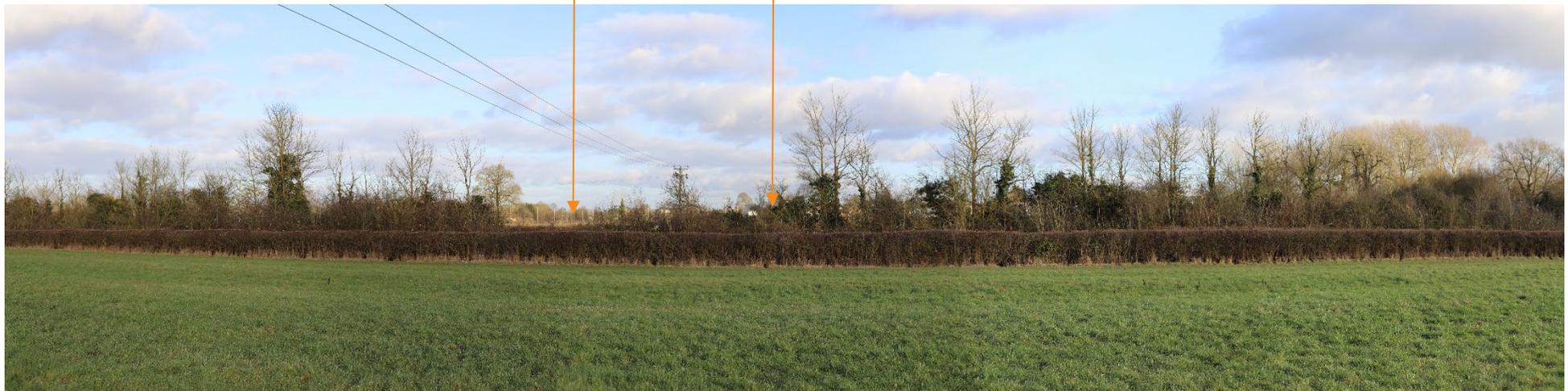
Vegetation flanking A350



Photograph 10 View north from southern extent of green wedge

Vehicles on A365

Houses south of Western Way roundabout



Photograph 11 View east from green wedge

4.10 Location 8: Bowerhill and Melksham

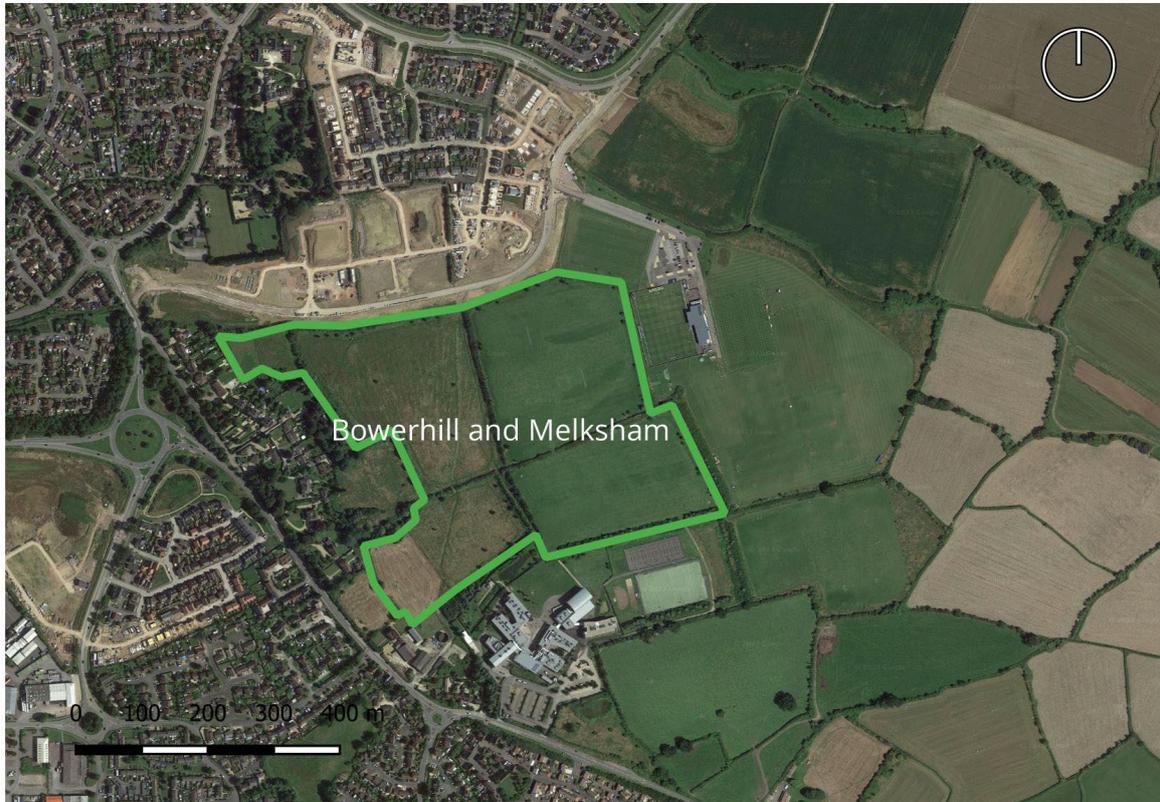
Table 8 Evaluation of green wedge between Bowerhill and Melksham

Criterion	Evaluation	Conclusion
1: Settlement Character	<p>The green wedge is within LCA C1: Melksham Open Clay Vale. Neither Melksham nor Bowerhill are located within a landscape character area.</p> <p>Both the southern edge of Melksham and the northern edge of Bowerhill include similar building typologies, typically comprising two storey red brick houses. Melksham is categorised as a Market Town in the Wiltshire Core Strategy and Bowerhill as a Large Village.</p> <p>The Spa, located between Melksham and Bowerhill, comprises distinctive detached Georgian houses, three of which are of four storeys, with ashlar facades, set within large gardens which provide a leafy setting.</p> <p>The rural landscape and the distinctive built form of The Spa, both located between Bowerhill and Melksham, provide a degree of separation between the two settlements, contributing to a semi-rural setting and preventing their physical coalescence.</p>	<p>Whilst the settlements exhibit similar building typologies, their physical separation is considered to protect their individual character.</p>
2: Green wedge character	<p>The 'Key Landscape Changes' identified for LCA C1 include "<i>Potential visually intrusive urban extensions to Melksham and Bowerhill</i>". The 'Management Strategy and Objectives' include "<i>Conserve and enhance the landscape setting of existing settlements/urban areas (such as Melksham and Bowerhill)</i>".</p> <p>The green wedge comprises flat fields of rough grassland to the west, and sports fields to the east. Tall, vegetated field boundaries limit intervisibility with the wider landscape, although glimpses of the settlement edges are apparent (Photograph 12).</p> <p>There are no buildings within the green wedge, promoting a rural and open character, creating a clear gap and transition between the two settlements, as experienced by people walking on the public right of way network.</p>	<p>The character of the wedge is sufficiently open to separate the two settlements.</p>

Criterion	Evaluation	Conclusion
3: Planning considerations	<p>The boundaries can be clearly identified by physical features, namely development boundaries and field boundaries.</p> <p>No sites within the green wedge are known to have received planning permission.</p> <p>The green wedge is entirely within the Neighbourhood Area.</p> <p>SHELAA sites are located in this area (for details, see Table 2), demonstrating development pressure here.</p>	<p>The green wedge is appropriate to be defined as such in terms of this criterion.</p>

4.27 The green wedge is considered to provide physical and perceptual separation between Bowerhill and Melksham and is therefore recommended for designation in the Neighbourhood Plan.

Figure 16: Recommended Green Wedge between Bowerhill and Melksham



Source: Google Earth

4.28 Figure 16 shows the extent of the green wedge between Bowerhill and Melksham. The northern boundary follows the southern edge of Melksham, as defined by a major new housing site under construction. The eastern boundary follows field boundaries between agricultural fields and Melksham Rugby and Football Club. The southern boundary follows the northern edge of Melksham Oak community School, whilst the edge of The Spa forms the western boundary.

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Houses on southern edge of Melksham



Photograph 12: View north towards Melksham

Houses fronting onto Bath Road



Photograph 13: View south towards Bowerhill

5. Conclusion, Recommendations and Next Steps

5.1 Introduction

- 5.1 This is an independent, impartial technical report which has assessed the potential and most appropriate locations for green wedges within the replacement JMNP, based on a comprehensive review of relevant evidence, including:
- National policy and guidance;
 - Desktop review of relevant evidence and policy in the study area;
 - Examples of Neighbourhood Plans from elsewhere;
 - Technical best practice in policy advice and landscape assessment; and
 - A site visit by landscape and policy planning specialists.
- 5.2 The report was progressed at the same time as a separate AECOM Site Assessment, whose conclusions are relevant for but independent of this report's conclusions. Likewise, any work being carried out by the Joint Melksham Neighbourhood Plan Steering Group on the potential for LGSs is also independent of this report, even if its conclusions have some relevance.
- 5.3 While there is no specific definition of green wedges and no explicit statement of the need to avoid coalescence in national policy and guidance, this does not mean that national policy is not supportive in principle of such designations, as evidenced by the many made Neighbourhood Plans across England that designate them.

5.2 Key conclusions and recommendations

- 5.4 It is considered that the emerging JMNP **can and should include a policy protecting land within designated green wedges** from development that would result in coalescence and loss of settlement identity, and that this report could form key evidence supporting that policy. Of the eight potential green wedges considered in this report, six were found to meet the criteria of green wedge designation at Neighbourhood Plan level.
- 5.5 The green wedge policy **should appear in the Regulation 14 consultation draft of the emerging JMNP**. This will enable feedback on the draft policy by relevant stakeholders, including the local community, landowners, developers, and WC.
- 5.6 After Regulation 14 consultation, the policy **should be amended if necessary, based on the representations received by consultees** (or for any other reason deemed appropriate). It can then be carried forward into the submission version of the replacement JMNP, to be reviewed by an independent Examiner against the Basic Conditions of neighbourhood planning.

- 5.7 Section 5.3 presents **one possible suggestion for the wording of a green wedge policy and supporting text which could be included in the replacement JMNP, based on the evidence reviewed**. While there is never any guarantee that such a policy or wording would pass Examination, it is considered that the wording below would maximise the chances of doing so. It is at any rate deemed appropriate for testing at Regulation 14 stage, to be amended as appropriate following any representations received or for any other reason the Qualifying Body deem appropriate.
- 5.8 The policy should only be included within the neighbourhood plan if **accompanied by a good-quality map clearly showing the boundaries of the green wedge designations**. Figure 17 below uses Google Earth imagery as a base to indicate what such a map might look like, although for the neighbourhood plan itself, a map with Ordnance Survey (OS) 1:25,000 scale base mapping, relying on an OS mapping license, would be preferable. It is understood that both the Qualifying Bodies hold such licenses.

Figure 17: Locations and extents of all recommended Green Wedge designations



Source: Google Earth

5.3 Suggestion for wording of policy and supporting text

Policy XXX: Green Wedges

Within designated Green Wedges (mapped in Figure XXX), development will only be supported where it:

- a) does not individually or cumulatively result in coalescence or loss of separate identity or character of individual settlements;*
- b) maintains the generally open character of the countryside;*
- c) minimises urbanising effects, such as artificial lighting and traffic movements;*
- d) retains important elements of the rural landscape such as trees and hedgerows; and*
- e) does not adversely impact the existing landscape and recreational value of the countryside.*

Justification

In recent years, extensive new housing development has been approved across the Neighbourhood Area. Some of this development has had the effect of increasing the perceived or actual coalescence between formerly free-standing settlements, each with their own history, character, and identity. Such development was in some cases permitted contrary to relevant policy in the Wiltshire Core Strategy because the Council was unable to demonstrate a five-year supply of deliverable housing sites, meaning the Core Strategy policies carried less weight, in line with the presumption in favour of sustainable development in NPPF paragraph 11).

The new Wiltshire SHELAA and separate town and parish Call for Sites carried out alongside the drafting of this Neighbourhood Plan clearly indicate that land continues to be promoted for development in locations where coalescence could result if an application were consented.

Shaw, Whitley, Beanacre, Bowerhill, Berryfield and Melksham itself each retain a unique character, history and sense of place derived from their landscape settings as recognisably distinct built-up areas distinguishable from other neighbouring settlements by intervening countryside.

The proportionate designation of certain areas of countryside outside settlement boundaries as green wedges can help prevent further erosion of local character and identity arising from coalescence, noting that developments can contribute to coalescence both individually and cumulatively. Further details on green wedges are set out in the AECOM/Iceni Projects Green Gap and Wedge study⁶² that forms part of the evidence underpinning this policy.

The areas designated as green wedges are proportionate in scale to the settlements they separate and have clearly-defined boundaries based on

⁶² Joint Melksham Neighbourhood Plan Steering Group to insert here link to where this report is saved on the JMNP website.

physical features. The restrictions on development are looser than for policy designations defined at a strategic level, including for example Green Belts, Areas of Outstanding Natural Beauty (AONBs) or National Parks. However, the restrictions are greater than those already applying to undesignated countryside (NPPF paragraphs 80 and 84c), to ensure the policy is effective. Relevant national policy supporting Green Wedge designation includes

-NPPF paragraph 9, which aims for planning policies to reflect the character of each area;

-NPPF paragraphs 130 c) and d), which respectively require planning policies to ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, and to ensure that developments maintain a strong sense of place.

The policy wording also reflects the adopted strategic development plan (Wiltshire Core Strategy) and the West Wiltshire Landscape Character Assessment (LCA) upon which it is based. While the Core Strategy does not have a specific green wedges policy of its own, policy CP51: Landscape requires proposals to conserve and enhance the locally distinctive character of settlements and their landscape settings, and the separate identity of settlements and the transition between man-made and natural landscapes at the urban fringe.

Similarly, Core Strategy Policy CP57: Ensuring High Quality Design and Place Shaping states that development is expected to create a strong sense of place through drawing on the local context and that applications should enhance local distinctiveness by responding to the value of the natural and historic environment, relate positively to its landscape setting and the existing pattern of development and take account of the characteristics of the site and the local context.

The Core Strategy further notes (paragraph 5.83) that the identity of Melksham and Bowerhill as separate communities will need to be preserved through the planning process. It also notes that both Berryfield and Bowerhill ‘have important individual characteristics which should be protected where practicable’.

The policy has also taken into account recent relevant planning application and appeal decisions on coalescence and landscape impact of development, which are material considerations for planning purposes. These are reviewed in detail in the AECOM/Iceni Projects study referenced previously.

Consultation carried out by the Joint Melksham Neighbourhood Plan Steering Group indicates that this policy has strong support among local residents and communities.⁶³

In developing this policy, the Joint Melksham Neighbourhood Plan Steering Group have noted potential for further green wedges extending outside the neighbourhood area (specifically, between Bowerhill and Seend/Seend Cleeve and between Bowerhill, Berryfield and Semington). However, it is recognised that these would not be appropriate to designate through a Neighbourhood Plan. As such, the Joint Melksham Neighbourhood Plan Steering Group support their

⁶³ Joint Melksham Neighbourhood Plan Steering Group to insert here link to where such evidence is saved on the JMNP website.

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designation as strategic or local green wedges within the emerging Wiltshire Local Plan.

Appendix A-Next Steps for Location 5: Bowerhill and Semington

On 10th March 2023, following completion of the draft final text of this report, Melksham Town Council and Melksham Without Parish Council informed AECOM of their proposed next steps for Location 5: Bowerhill and Semington.

Following receipt of this information, it was agreed between the Town and Parish Councils, AECOM and Locality that while the conclusions of the original report would stand, this appendix would be added to indicate the proposed next steps for a candidate green wedge in this location.

The Town and Parish Councils firstly contacted Wiltshire Council to determine if there was any prospect of a strategic green wedge (i.e. one that can cut across parish boundaries) being designated in this location within the emerging Wiltshire Local Plan, a possibility mentioned in the main body of this report.

David Way, Neighbourhood Planning Officer at Wiltshire Council, indicated in response that the emerging Local Plan will not contain such a strategic designation. On the basis of this information, the Town and Parish councils have commenced joint working with Semington Parish Council to seek to co-ordinate a non-strategic green wedge in this location across the two separate emerging neighbourhood plans.

The objective is the designation of a green wedge crossing the parish boundary of Melksham Without and Semington; as such, data and evidence similar to that presented in this report would need to be gathered on the Semington side of the boundary. In their e-mail, the Town and Parish Councils indicate that this process has already started. The ultimate aim is to ensure that both the Examiner for the replacement JMNP and the Examiner for the emerging Semington Neighbourhood Plan come to the same conclusion, i.e. that a cross-boundary (but non-strategic) green wedge is justified in this location based on relevant evidence.

Potentially relevant evidence mentioned by the Town and Parish Councils that could inform the neighbourhood plan processes on both sides of the border is the as yet undetermined planning application for the restoration of the Wiltshire and Berkshire Canal⁶⁴ by the Wilts and Berks Canal Trust as part of their Melksham Link project.⁶⁵

This project/planning application was not mentioned in the main body of the report because it was superseded by the overall conclusion that it would not be possible to designate a strategic green wedge in this location; this has now been confirmed by Wiltshire Council. However, it could indeed be relevant in the context of planning a co-ordinated non-strategic green wedge across the two neighbourhood plans.

⁶⁴ Available at <https://development.wiltshire.gov.uk/pr/s/planning-application/a0i3z000014ebeJAAQ/w1201080ful>

⁶⁵ See <https://www.wbct.org.uk/mcc-projects/melksham-link>

