

Appendix 6.1: Summary of changes

Regulation 14 comments received and response of the Steering Group

All consultation responses were logged, reviewed and where necessary or appropriate, changes were made resulting in the submission version of the JMNP2. Appendix 6.2 logs all the feedback. A summary of the main changes to the policies (and one objective) of the Neighbourhood Plan as a result of all the Regulation 14 Consultation comments received is provided below in Table 7*. Changes and updates were also made where necessary to the supporting text of the Plan.

*These are included in the main Consultation Statement but repeated as a separate Appendix 6.1, for ease of reference for respondents to view the Summary table from a direct link on the website.

Table 7: Summary of comments made to the Regulation 14 Consultations of the Joint Melksham Neighbourhood Plan 2 (JMNP2) and the proposed changes to the Plan

(Please note - for the final version of the Policy, please see the submission version of JMNP2. Non material, minor updates may have been made in the final edit of the Plan).

Regulation 14 comment	Proposed Change
CAWS (Community Action: Whitley & Shaw) suggested a change to Objective 14: Protecting settlements' rural setting and countryside gaps between Melksham, Bowerhill and surrounding villages.	Protecting settlements' rural setting and countryside gaps between Melksham, Bowerhill and surrounding villages. across the plan area
Summary of Issue raised at Regulation 14 Consultation (and Health Check feedback also noted where relevant)	Proposed Changes made to Policy for SUBMISSION (new text shown in red. Deleted text struck through)
Policy 1: Sustainable Design and Construction	
Community respondents in majority support the policy. WILTSHIRE COUNCIL consider that the policy has been updated and is in many ways reflective of the emerging sustainable construction policy in the Wiltshire Local Plan Review. It is considered to be pitched as ambitious as is reasonably	Policy 1: Sustainable Design and Construction New development schemes that demonstrate how carbon emissions are minimised, with the target of zero carbon in operation, Within the constraints of scale and viability, proposals are expected to demonstrate how the impacts of climate change are mitigated and adapted to, will be supported. This includes:

possible. The policy is therefore supported in principle and provided helpful points of detail to 'tighten-up' the policy. These have all been accepted.

Landowners and agents provided mixed responses. The Steering Group were pleased to note clear support from some and confidence that proposals coming forward would meet the requirements. Others commented that the policy was too onerous and unnecessary given the content of the emerging Local Plan.

The Health Check also gave detailed feedback suggesting the deletion of the last sentence and a review of criteria d & f due to a written ministerial statement in 2015 (which has been updated by the one referenced above).

a. Submission of a Sustainable Energy Strategy for all new development schemes (of all scales) to demonstrate how carbon emissions are minimised, with the target of zero carbon in operation (regulated and unregulated energy). This should demonstrate whether a development will achieve an annual operational net zero carbon emissions balance, by modelling each building's estimated regulated energy consumption and the site's overall renewable energy (electricity and heat) generation. Major development proposals for all new residential buildings should target the following Key Performance Indicators:

- 1. space heating demand of less than 30KWh/m2/ year;**
- 2. total energy consumption less than 40kWh/m2/ annum;**
- 3. provision of enough renewable energy output to match the total energy use.**

b. Embedding the Energy Hierarchy within the design of buildings by prioritising fabric first, orientation design and landscaping, in order to minimise energy demand for heating, lighting and cooling, as well as maximising renewable energy generation. All proposals should consider deliver opportunities, to provide solar PV and energy storage to electrify improve space heating and energy consumption by considering a range of low-carbon and renewable technologies;

c. Demonstrating good connections to existing services and facilities, and/or a mix of uses that minimises the need to travel by private vehicle;

d. maximising green and blue infrastructure to sequester carbon and provide other benefits such as shade;

e. use of appropriate sustainability assessment tools, such as the Building Research Establishment's Environmental Assessment Method (BREEAM), Home Quality Mark for residential development and/or CEEQUAL (or equivalents) for infrastructure development. All major development should set out how embodied carbon associated with the development has been considered and will be minimised in materials has been minimised.

	<p>f. Commercial Non-residential development that achieves BREEAM 'Excellent' certification or equivalent certification;</p> <p>g. the retention of existing buildings where possible and retrofitting measures to improve the energy performance of existing buildings (where planning permission is required).</p> <p>Where this relates to designated and non-designated heritage assets appropriate sensitive approaches and materials must be used in order to maintain the significance of heritage assets through the application of established best practice.</p>
<p>Community generally supportive of the policy.</p> <p>WILTSHIRE COUNCIL commented that this update of the policy places more onerous requirements on renewable energy projects than existing national or local policy and should be reviewed. As such the policy has been reviewed and some text removed to bring it closer to the JMNP1 approved policy.</p> <p>Landowners and agents commented that the policy was too onerous, detailed and unnecessary given the content of the emerging local plan.</p> <p>Community Action Whitley and Shaw (CAWS) submitted comments and suggestions for updating this policy in both Regulation 14 consultations. They expressed concern that the Battery Energy Storage Systems and cumulative impact was not included. The majority of suggestions have been taken on board. Where the group sought to include policy criteria for proposals only being supported on</p>	<p>Policy 2: Local Renewable and Low Carbon Energy and Associated Infrastructure</p> <p>1. Proposals for renewable energy, low carbon energy generation projects/developments, and associated infrastructure including Battery Energy Storage Systems (BESS) will be supported where it can be demonstrated that:</p> <ul style="list-style-type: none"> a. the siting and scale of the proposal is appropriate to its setting; and b. the proposal will not result in adverse impacts on the local environment which cannot be satisfactorily mitigated; and c. the proposal does not create an unacceptable impact on local amenity and safety; and, d. the proposal does not have an unacceptable degree of impact on a feature of heritage, natural or biodiversity importance. Proposals for stand-alone, ground mounted solar photovoltaic development should demonstrate, where possible, that some form of agricultural activity will continue, and/or there are biodiversity improvements around arrays; and, e. the proposal, when taking into consideration other Local Renewable and Low Carbon Energy and associated infrastructure in the area, will not result in an unacceptable cumulative impact. <p>2. Schemes where there are direct benefits to the local community such as energy supplied directly, or financial benefits will be supported. Proposals for community energy generation</p>

brownfield, this has been adapted into the final selection of the policy.

Supporting text has also been updated to reflect the additional elements in the policy.

projects, where there is full or partial ownership and/or control by a local community, **subject to other conditions in this policy**, will be strongly supported.

3. Subject to the above conditions, schemes where the energy produced can be used on or near the generation site/where energy storage is incorporated will be supported. ~~Proposals for energy storage will be supported, where it meets one or more of the following:~~
~~a. it is located on or near, existing or proposed renewable energy generation sites;~~
~~b. it alleviates grid constraints; and~~
~~c. it enables the delivery of further renewable developments.~~

Proposals that harness buildings and structures, or are on brownfield, should be optimised as a preference to use of greenfields for renewable energy generation or associated infrastructure where possible.

Community generally supportive of the policy,

Small changes suggested by Wiltshire Council and the Environment Agency and Wessex Water (see the third paragraph for additional text in response to WW).

Health Check noted that this policy was unaltered from JMNP1. The Modification Statement will need to be updated to reflect the changes.

Definition of 'catchment area' will be added to the supporting text in response to comments from CAWS.

Landowners and agents commented that the policy was too onerous, detailed and unnecessary given the content of the emerging local plan.

Policy 3: Flood Risk and Natural Flood Management

~~Particularly in the South Brook catchment area,~~ **Natural flood management works to conserve and enhance the ecological flood storage value of the water environment, including watercourse corridors and catchments, are supported. Where development proposals are in areas with known surface water flooding issues, they should include appropriate mitigation and construction methods, including where appropriate, contributions towards wider catchment projects.**

All development should demonstrate how flood risk is mitigated. This should include measures to reduce the amount of rainwater run-off (in line with the surface water discharge hierarchy) and incorporate Sustainable Drainage Systems (SuDs), where appropriate as part of the Natural Flood Management approach and wider Green and Blue Infrastructure networking. Where required, flood risk and groundwater assessments should be undertaken and surface water drainage strategy must be

	<p>developed and delivered. The drainage strategy must ensure that flood risk is addressed to 1 in 100 year storm event plus climate change in line with Environment Agency Guidance.</p> <p>This is particularly relevant to the South Brook catchment area which has been identified as a priority flood risk area due to surface water flooding.</p>
<p>Community generally supportive of the policy, but raised concerns over costs of EV vehicles, and many expressed the need to see improvements in public transport.</p> <p>The Health Check recommended that its content be reviewed against current Building Regulations which now (an update since the JMNP1) carry a stipulation applicable to the provision of charging points that would negate the need for at least some aspects of the policy.</p> <p>WILTSHIRE COUNCIL officers recommended the addition of text to address an emerging inequality. They support the retention of the policy as a way to promote the importance of the inclusion of EV and other alternatives in new developments.</p> <p>Some support. Others commented that the policy was too onerous and unnecessary given Building Regulations.</p>	<p>Policy 4: Ultra Low Emission Vehicle Charging Development proposals for houses with on-plot parking spaces and/or garages are encouraged to provide appropriately located charging technology for charging low emission vehicles, such as an electric vehicle charging point.</p> <p>Where shared or off-plot parking spaces are provided, the charging provision locations should have appropriate regard for pedestrian movement. Proposals for new employment, leisure or retail developments are also encouraged to make provision for charging facilities for staff and/or other users.</p> <p>Technology for charging low emission vehicles, such as electric vehicle infrastructure for all development proposals will be required in accordance with national or Wiltshire Council standards as relevant.</p> <p>Support shall be given to proposals where the layout and parking arrangements are designed to provide charging for low emission vehicles (such as an electric vehicle charging point) regardless of the size or tenure of the home; and the developer commits to a planning condition requiring a provision to every dwelling prior to its first occupation where possible.</p> <p>Insofar as planning permission is required, on existing streets (e.g. on-street facilities integrated with street furniture like lighting columns) will be supported subject to detailed considerations such as heritage implications.</p>
<p>Policy 5: Pre-Application Community Engagement</p>	<p>Policy unchanged from JMNP1</p>
<p>Policy 6: Housing in Defined Settlements</p>	

Community respondents majority support the policy, but many also said they weren't sure, and / or expressed concern about the lack of infrastructure coupled with new housing.

Wiltshire Council and other stakeholders (including the Health Check) advised that the policy needed much more flexibility in order to be able to respond to changing local needs.

Policy 6 – Housing in at Defined Settlements

- 1. Proposals for sustainable housing accommodated through development and redevelopment opportunities within existing settlement boundaries of the Plan area will be supported. ~~within the settlements of the Neighbourhood Area will be supported where they accord with the Settlement Boundary provisions of Wiltshire Local Plan Policy 1 and adopted site allocations.~~**

- 0. Housing outside settlement boundaries will be managed in accordance with the adopted Development Plan (Neighbourhood Plan and Local Plan) or allocated for development in this Plan or the adopted Wiltshire Local Plan, and will also be expected to meet evidenced local housing need.**

- 0. New housing will be supported where proposals demonstrate how housing types and tenures have responded positively to meeting local needs, informed by the Melksham Neighbourhood Plan Area Housing Needs Assessment (2023), the Wiltshire Local Housing Needs Assessment, or new evidence of local housing need that has been validated by the local planning authority, and endorsed by the Town and Parish Council. Particular attention should be demonstrated for:**
 - . delivering rented and owner-occupied homes in a tenure-blind mix, design and layout;**
 - . increasing the supply of affordable homes in conformity with adopted Wiltshire Council affordable housing policy; ~~At least 40% of new housing will be provided as affordable housing tenures in conformity with Wiltshire Local Plan policy 76.~~**
 - . ~~To address particular local issues of affordability and demand for affordable homes for first time buyers and local~~**

	<p>households on below average incomes, about 55% of affordable housing should be provided as discounted market affordable housing products, including shared ownership and First Homes products. addressing particular local issues of affordability and demand for affordable homes for first time buyers and local households on below average incomes. Linked to this, providing First Homes housing through developer contribution at up to a 40% discount of the open market value to address local issues of affordability;</p> <ul style="list-style-type: none"> . at Melksham and Bowerhill, prioritising the delivery of a balanced mix of two, three and four bedroom dwellings which should include bungalows; . at Shaw and Whitley, increasing the proportion of two and three bedroom dwellings, to address a shortfall in their availability. . meeting the needs of an increasing local population of older people and those living with disabilities 50% of new housing will meet accessible home standards. Housing that meets part M4(2) of the Building Regulations, Category 2: accessible and adaptable dwellings will be supported. Proposals for age restricted housing and extra-care communities will be supported only in the most sustainable locations where they are closely linked to local services and public transport.
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Policy 7 - ALLOCATIONS

Policy 7.1: Land at Cooper Tires

<p>There is majority community support for the allocation of this site but some raised concern about flooding and the importance of uses other than housing on the site.</p> <p>The housing number that the Neighbourhood Plan consulted on for the Cooper Tires site was at least 150. Wiltshire Council were not happy with this as it implied</p>	<p>Land at the former Cooper Tires main factory site, as defined in figure 6, is allocated for development of a mixed use scheme which will optimise the effective use of the site, including:</p> <p>a. At least 150 Approximately 100 dwellings to include a minimum of 10% affordable housing subject to viability to be provided within the JMNP2 period to 2038. Further housing will be supported in principle in the context of a comprehensive masterplan for the site and</p>
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that a lot more would be built. Wiltshire Council wanted the wording to change to 'approximately' 150 which could suggest the potential for slightly more or less than this number but wouldn't imply that there would be significantly more.

This site is in flood zone 1, 2 and 3 and the plan has no evidence that dwellings can be built in flood zone 2 & 3 without spending a lot of money on a sequential flood test which the councils do not have the resources or time to do. The number to include 'approximately 100' which will fit on flood zone 1, with text related to further housing so that it means that there is a potential for more, so that the developer considers it to be a viable site.

The landowners agents, and other agents also offered feedback on the policy.

addressing key policy and constraints, including flood risk.

~~b. Replacement employment and commercial floorspace (class E, B2 and B8),
c. Community facility, leisure and cultural uses,
d. Retail (subject to conformity with adopted town centre retail policy),~~

b. Other uses including employment, community, leisure, retail and cultural uses where they contribute to creating a sustainable neighbourhood, are consistent with other adopted policies, scheme viability and the delivery strategy.

~~E-c. New accessible walking and cycling routes, including riverside public realm,~~

~~f. Riverside public realm,~~

gd. Flood mitigation infrastructure.

A single comprehensive master plan, phasing and delivery strategy for the development must be prepared, and then approved by the local planning authority, as part or in advance of any detailed planning application being submitted for the whole or part of the allocated site. This must take account of the requirements of this policy and supporting concept plan. Detailed planning applications must be in accordance with the approved masterplan. Proposals the masterplan and planning proposals should be prepared with early pre- application consultation with the local community.

Development proposals for the site will:

Heritage

- 1. Be supported by a heritage assessment of the existing on-site and neighbouring buildings and the impact of proposed development.**
- 2. Protect or enhance the setting of on-site heritage assets; Avon House (listed Grade II) and the former factory canteen (local non- designated heritage asset) and adjacent heritage assets; Town Bridge (Grade II) and Unicorn Public House (Grade II) in conformity with JMNP2 Policy 21.**

3. Investigate the presence and significance of archaeological remains and avoid areas of high value remains where preservation in situ is to be required.

**Landscape, Green and Blue
Infrastructure and Biodiversity**

4. Be informed by arboriculture, landscape and ecology surveys and an approved management and construction management plan to secure the protection of existing and enhanced landscape features, priority species and ecology within the site and River Avon environment.

5. Provide a scheme of site landscape, green and blue infrastructure and communal outdoor space that protects existing trees, contributes positively to resident health and wellbeing and increases on-site tree canopy cover ~~by 20%~~ in accordance with JMNP2 Policies ~~12, 14, 17 and 18.~~

6. Deliver a minimum 10% net gain in on-site biodiversity.

Design

7. Be a high quality of design, appearance and materials in conformity with JMNP2 Policies 9 and 20 and demonstrate a positive response to Melksham Town Centre Master Plan Report (2023) and Melksham Design Guide and Codes (2023) and the Wiltshire Design Guide (2024).

8. Protect the amenity of neighbouring employment and retail uses and residents of Scotland Road, Bath Road and dwellings adjacent to the north-west site boundary.

9. Provide a high standard of residential amenity and wellbeing by achieving design principles contained within recognised design guidance including “Buildings for a Healthy Life” (Homes England).

10. Be resilient to and/or mitigate climate change and make proportionate contributions to Wiltshire carbon neutrality targets including potential significant use of renewable energy, re-use of existing built fabric and sustainable construction methods in accordance with JMNP2 Policies 1 and 2.

Flood Risk

11. Be supported by a proportionate flood risk assessment, testing and mitigation strategy.
12. Include sustainable drainage to manage the discharge of surface water to mitigate flood risk within the site, neighbouring land and downstream.
13. Include measures to ensure the safety of residents, staff and visitors in the event of flooding.

Access and Movement

14. Make safe and convenient level walking and 'wheeling' connections within the site and to the existing public realm.
15. Provide vehicular access to the site and address any necessary off- site works informed by an access and transportation study and strategy.
16. Implement resident, visitor and commercial premises parking and servicing in conformity with Wiltshire Council parking standards.
17. Ensure ultra-low emission vehicle (ULEV) charging infrastructure provided in line with JMNP2 Policy 4.
18. Provide resident and employee travel plans to encourage sustainable travel.

Wilts & Berks Canal Link Project

19. Integrate the future implementation of the Wilts & Berks Canal Link project within the scheme design where it relates directly to the site in conformity with Wiltshire Development Plan policies for safeguarding the route of the Wilts & Berks Canal and explore opportunities for renewable energy installation.

Make appropriate and relevant financial contributions to infrastructure will make-which may include proportionate contributions towards:

- Early years, primary and secondary education
- Healthcare capacity to meet the needs created by the development.
- Measures to positively support walking and cycling in Melksham including links between the site, Melksham Railway Station and town centre and neighbouring facilities and communities.

	<p>The level of contribution sought will be considered in the context of site viability and other relevant considerations, including deliverability.</p>
<p>Policy 7.2 Land at the Former Melksham Library Site</p>	
<p>There was clear community support for this allocation. People were supportive of the redevelopment of a brownfield site and the use proposed in the central location.</p> <p>Wiltshire Council suggested that the Neighbourhood Plan should look at the definition of 'Extra Care' in the local plan so that everyone was on the same page. It had also been advised that the Neighbourhood Plan may have to review the tenancy on the site as might not be able to be just for extra care. It may need to be a mixture of tenancies with the majority being extra care which looks to be the most suitable way forward.</p> <p>Planning agents questioned the deliverability of the allocation.</p>	<p>Policy 7.2REV: Land at the Former Melksham Library Site</p> <p>Land at the former Melksham Library, Lowbourne House and adjacent public car park shown in figure 7 is allocated for development of up to approximately 50 extra-care specialist dwellings for older people including affordable housing (Class C3) to be restricted to qualifying older people.</p> <p>Development proposals for the site will:</p> <p>Heritage</p> <ol style="list-style-type: none"> 1. Be supported by a heritage assessment of the existing buildings and the impact of proposed development. 2. Protect or enhance the setting of adjacent listed buildings and the character of Melksham Conservation Area. 3. Investigate the presence and significance of archaeological remains and avoid areas of high value remains where preservation in situ is to be required. <p>Landscape, Green and Blue Infrastructure and Biodiversity</p> <ol style="list-style-type: none"> 4. Be informed by arboriculture, landscape and ecology surveys and an approved management and construction management plan to secure the protection of existing and enhanced landscape features, priority species and ecology within the site. 5. Provide a scheme of site landscape, green and blue infrastructure and communal outdoor space that protects existing trees, contributes positively to resident health and wellbeing and increases on-site tree canopy cover by 20% in accordance with JMNP2 Policies 12, 14, 17 and 18.

6. Deliver a minimum 10% net gain in on-site biodiversity.

Design

7. Be a high quality of design, appearance and materials in conformity with JMNP2 Policies 9 and 20 and demonstrate a positive response to Melksham Town Centre Master Plan Report (2023) and Melksham Design Guide and Codes (2023) and the Wiltshire Design Guide (2024).

8. Protect the amenity of neighbouring uses and residents of Union Street.

9. Provide a high standard of residential amenity by achieving design principles contained within recognised design guidance **for specialist housing for older people** including **such as** “Design Principles for Extra Care Housing” (Housing Learning and Improvement Network, 2020).

10. Be resilient to and/or mitigate climate change and make proportionate contributions to Wiltshire Carbon Neutrality targets including potential significant use of renewable energy, re-use of existing built fabric and sustainable construction methods in accordance with JMNP2 Policies 1 and 2.

Flood Risk

11. Be supported by a proportionate flood risk assessment and strategy.

12. Include sustainable drainage to manage the discharge of surface water to mitigate flood risk within the site and neighbouring land.

13. Include **a flood emergency plan, where considered necessary** measures to ensure the safety of residents, staff and visitors in the event of flooding.

Access and Movement

14. Make safe and convenient level walking and ‘wheeling’ connections within the site and to the public realm.

15. Provide vehicular access to the site from Lowbourne, potentially utilising the existing access point.

16. Implement resident, visitor and commercial premises parking and servicing in conformity with Wiltshire Council parking standards and include safe parking for resident personal mobility devices.

	<p>17. Provide ultra-low emission vehicle (ULEV) charging infrastructure in line with JMNP2 policy 4.</p> <p>18. Provide resident and employee travel plans to encourage sustainable travel.</p> <p>Make appropriate and relevant financial contributions to infrastructure will make-which may include proportionate contributions towards:</p> <p>19. Healthcare capacity to meet the needs created by the development.</p> <p>20. Measures to positively support walking and cycling in Melksham town centre.</p> <p>21. Contributions towards town centre public car parking improvements as identified in the Melksham Parking Study (AECOM 2024) to mitigate the loss of public parking within the allocation site.</p>
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Policy 7.3: Land South of Western Way

<p>The landowner agents supported the inclusion of the site allocation, but gave specific comments on some aspects of the policy criteria.</p> <p>Wiltshire Council gave some constructive feedback and suggestions.</p>	<p>Policy 7.36 NEW: Land South of Western Way Bowerhill</p> <p>Land south of Western Way, Bowerhill, Melksham, as identified in figure 8, is allocated for development of:</p> <p>a. Up to 210 dwellings (class C3) including Affordable Housing, to meet identified local housing needs in conformity with JMNP2 Policy 6; and,</p> <p>b. a 70-bed residential care home (Class C2).</p> <p>Any detailed application being submitted for the whole or part of the site must be in accordance with the approved parameters plans single comprehensive masterplan, phasing and delivery strategy for the development of the site that has been approved by the local planning authority.</p> <p>Proposals should be prepared in early pre-application consultation with the local community. Development of the site will:</p>
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Landscape, Green and Blue Infrastructure and Biodiversity

- 1. Be informed by arboriculture, landscape and ecology surveys and an approved management and construction management plan to secure the protection of existing and enhanced landscape features, priority species and ecology within and adjacent to the site.**
- 2. Provide a scheme of site landscape, green and blue infrastructure and communal outdoor space that protects existing trees, contributes positively to resident health and wellbeing and ~~increases on-site tree canopy cover by 20%~~ in accordance with JMNP2 Policies 12, 14, 17 and 18.**
- 3. Deliver a minimum 10% net gain in on-site biodiversity.**

Design

- 4. Include a site layout, built form and scale that minimises visual impacts and safeguards the amenities of existing and new neighbouring residents, education and employment uses.**
- 5. Provide a high standard of residential amenity and wellbeing by achieving design principles contained within recognised design guidance including “Buildings for a Healthy Life” (Homes England) and the Wiltshire Design Guide (2024).**
- 6. Be a high quality of design, appearance and materials in conformity with JMNP2 Policy 20 and demonstrating a positive response to the Melksham Design Guide and Codes (2023).**
- 7. Be resilient to and/or mitigate climate change and make proportionate contributions to Wiltshire’s carbon neutrality targets including ~~potential significant~~ use of renewable energy and sustainable construction methods in accordance with JMNP2 Policies 1 and 2.**

Flood Risk

- 8. Be supported by a proportionate flood risk assessment and strategy.**
- 9. Include sustainable drainage to manage the discharge of surface water to mitigate flood risk within the site and neighbouring land.**
- 10. Integrate measures to protect and enhance watercourses**

surrounding the site through appropriate buffers to allow for access and maintenance.

Access and Movement

11. Provide a new vehicular, pedestrian and cycle access from Maitland Place and an internal road network which will incorporate a bus loop.

12. Provide a secondary emergency highway access.

13. Create a pedestrian and cycle only access from Western Way and the Public Right of Way MELW42 to the west of the site boundary and a pedestrian and cycle path network including a spine and orbital pedestrian route connecting with on-site green and blue infrastructure and neighbouring communities, schools and facilities and ~~Bowerhill~~

~~employment area;~~

14. Fund provision of a new signal controlled 'Toucan' crossing of Western Way.

15. Create a 2 metre wide footway connection along the southern side of Western Way adjacent to the site boundary.

16. ~~Provide bus stop~~ **Contribute towards provision of public transport and enhancement** of facilities within less than 5 minutes easy walk of all residents and contributions to provide a viable service.

17. Implement resident and visitor parking and servicing in conformity with Wiltshire Council parking standards.

18. Provide ultra-low emission vehicle (ULEV) charging infrastructure in line with JMNP2 policy 4.

19. Provide resident and employee travel plans to encourage sustainable travel.

Make appropriate and relevant financial contributions to infrastructure will make-which may include proportionate contributions **towards:**

20. ~~Early years, primary and secondary education~~ **where appropriate.**

21. On, or off-site healthcare capacity to meet the needs created by the development.

22. Measures to positively support walking and cycling and public transport use between the site, Melksham town centre and

	<p>Melksham railway station and linking into existing networks. 23. Contributions towards a Melksham Transport Strategy.</p>
<p>Policy 7.4: Land at Whitley Farm, Whitley</p>	
<p>There was support for this policy from the community, but that was closely followed by the number of people who said they weren't sure. Few objected. People mentioned the importance of protecting the heritage and again associated infrastructure needed with increasing population.</p> <p>Wiltshire Council objected to this allocation. Historic England expressed a need to discuss and document discussion with Wiltshire Council in relation to the heritage importance of the site.</p> <p>Following meetings with the Steering Group and the Parish Council in April 2024, the policy approach has been discussed further with Wiltshire Council's heritage officer, to explore her comments raised regarding the suitability of including unit numbers within a proposed allocation. It is agreed that a detailed proposal will need to be brought forward through a pre-application and application process, and her preference is for a neighbourhood plan policy which enables redevelopment to be brought forward, but does not pre-determine the scale of development.</p>	<p>Policy 7.34: Land at Whitley Farm, Whitley</p> <p>Land at Whitley Farm, Whitley, as identified in figure 9, is allocated to enable the development of:</p> <p>a. Approximately 15 new dwellings to include affordable housing; a. redevelopment of redundant modern agricultural buildings and structures; and, b. conversion and re-use of the Grade II listed Whitley Farm barn.</p> <p>Development of the site will:</p> <p>Heritage</p> <ol style="list-style-type: none"> 1. Be informed by a robust scheme specific heritage assessment approved by Wiltshire Council which addresses justifies any proposed change of use, and the extent, scale and design of residential development and the potential for re-use of the listed barn redevelopment and any conversion of the listed barn, having regard to the impact on the heritage assets at the site. 2. Secure the protection or enhancement of the setting of Whitley Farm House and barn (Grade II), in conformity with adopted Wiltshire Development Plan heritage policy and JMNP2 Policy 2. 3. Investigate the presence and significance of archaeological remains and avoid high value archaeological remains where preservation in situ is to be required. <p>Landscape, Green and Blue Infrastructure and Biodiversity</p> <ol style="list-style-type: none"> 4. Be informed by arboriculture, landscape and ecology surveys and an approved management and construction management plan to secure the protection of existing and enhanced landscape features, priority species and

ecology within the site and River Avon environment.

5. Provide a scheme of site landscape, green and blue infrastructure and communal outdoor space that protects existing trees, enhances the rural setting, and contributes positively to resident health and wellbeing. On-site tree canopy cover should be increased by 20% in accordance with JMNP2 Policies 12, 14, 17 and 18.

6. Deliver a minimum 10% net gain in biodiversity.

Design

7. Be of a sensitive high-quality design, appearance and materials that responds appropriately to the listed farm setting informed by The National Farmstead Assessment Framework (Historic England) and in conformity with JMNP2 Policy 20 and demonstrating a positive response to the Melksham Design Guide and Codes (2023) and Wiltshire Design Guide (2024).

8. Safeguard the amenities of neighbouring residents.

9. Where residential development is proposed, provide a high standard of residential amenity and wellbeing by achieving design principles contained within recognised design guidance including “Buildings for a Healthy Life” (Homes England),

10. Be resilient to and/or mitigate climate change and make proportionate contributions to Wiltshire Carbon Neutrality targets including potential significant use of renewable energy and sustainable construction methods in accordance with JMNP2 Policies 1 and 2.

Flood Risk

11. Be supported by a **proportionate** flood risk assessment and strategy.

12. Include sustainable drainage to manage the discharge of surface water to mitigate flood risk **downstream and** within the site and prevent and where possible reduce flood risk to neighbouring land where it relates to the allocation site.

	<p>13. Off-site works on land within the landowner’s control to improve flood management within Whitley.</p> <p>Access and Movement</p> <p>14. Provide vehicular, pedestrian and cycle access from First Lane.</p> <p>15. Provide safe and convenient walking and wheeling connections to existing pavements in First Lane and the existing public right of way adjacent to the rural boundary of the site.</p> <p>16. Implement residential and employee vehicle and cycle parking in conformity with adopted Wiltshire Council parking standards.</p> <p>17. Provide ultra-low emission vehicle (ULEV) charging infrastructure in line with JMNP2 policy 4.</p> <p>Make appropriate and relevant financial contributions to infrastructure will make, which may include proportionate contributions to the following (subject to the detail of proposals):</p> <p>18. Early years, primary and secondary education.</p> <p>19. Off-site healthcare capacity to meet the needs created by the development.</p> <p>20. Measures to positively support walking and cycling and public transport use within Shaw and Whitley.</p>
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Policy 7.5: Land at Middle Farm

<p>The community generally either supported or were not sure about this allocation. Concerns were expressed by both objectors and others about impact on flooding in the area and the importance of ensuring that development levels were proportionate.</p> <p>Updates to the policy have been made in response to feedback on other policies to make sure all allocations are aligned.</p>	<p>Policy 7.5-7NEW: Allocation of Land at Middle Farm, Corsham Road, Whitley</p> <p>The 3 hectare plot of land at Middle Farm, Corsham Road, Whitley as identified in figure 9a is allocated for development of about 55 dwellings including affordable and accessible housing and bungalows.</p> <p>A single comprehensive master plan, phasing and delivery strategy for the development must be prepared, and then approved by the Local Planning Authority in advance of any planning application being submitted for the whole or part of the allocated site. This must take account of the requirements of this policy and the principles shown within the concept plan. Detailed Planning applications must be in accordance with the approved masterplan.</p>
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Proposals should be prepared with early pre-application consultation.

Development proposals for the site will:

Heritage

1. Be informed by a proportionate heritage assessment approved by Wiltshire Council.
2. Protect the setting of neighbouring listed buildings, Whitley House and barn (Grade II), in conformity with JMNP2 Policy 21.
3. Investigates the presence and significance of archaeological remains and avoids high value remains where preservation in situ is to be required.

Landscape, Green and Blue Infrastructure and Biodiversity

4. Be informed by arboriculture, landscape and ecology surveys and an approved management and construction management plan to secure the protection of existing and enhanced landscape features, priority species and ecology within the site.
5. Provide a scheme of site landscape, green and blue infrastructure and communal outdoor space of about 1 hectare that minimises impacts on rural openness and tranquillity, protects existing trees, contributes positively to resident health and wellbeing and increases on-site tree canopy cover by 20% in accordance with JMNP2 Policies 12, 14, 17 and 18.
6. Deliver a minimum 10% net gain in on-site biodiversity.

Design

7. Be of a layout and form that minimises visual impacts and safeguards the amenities of neighbouring residents.
8. Provide a high standard of residential amenity and wellbeing by achieving design principles contained within recognised design

guidance including “Buildings for a Healthy Life” (Homes England), and the Wiltshire Design Guide (2024).

9. Be of a distinctive high quality of design, appearance and materials in conformity with JMNP2 Policy 20 and demonstrating a positive response to the Melksham Design Guide and Codes (2023).

10. Be resilient to and/or mitigate climate change and make proportionate contributions to Wiltshire Carbon Neutrality targets including potential significant use of renewable energy and sustainable construction methods in accordance with JMNP2 Policies 1 and 2.

Flood Risk

11. Be supported by a **proportionate** flood risk assessment and strategy.

12. Include sustainable drainage to manage the discharge of surface water to mitigate flood risk within the site and prevent and where possible reduce flood risk to neighbouring land where it relates to the allocation site.

Access and Movement

13. Provide a vehicular, pedestrian and cycle access from Corsham Road.

14. Provide safe and convenient walking and wheeling connections to existing pavements in Corsham Road and the existing public right of way through the site.

15. Fund a new pedestrian crossing of Corsham Road to adoptable standard.

16. Protect and enhance the existing Public Right of Way along the site’s northern boundary with connections to on-site public open space provision in conformity with JMNP2 Policy 11.

	<p>17. Implement residential and employee vehicle and cycle parking in conformity with adopted Wiltshire Council parking standards.</p> <p>18. Provide ultra-low emission vehicle (ULEV) charging infrastructure in line with JMNP2 policy 4.</p> <p>Make appropriate and relevant financial contributions to Infrastructure will make, which may include proportionate contributions to the following (subject to the detail of proposals):</p> <p>19. Early years, primary and secondary education.</p> <p>20. Off-site healthcare capacity to meet the needs created by the development.</p> <p>21. Measures to positively support walking, cycling and public transport use.</p>
Policy 8: Infrastructure Phasing and Priorities	
<p>Community generally supportive of the policy. Though many have commented on the need for increased healthcare provision and schools etc.</p> <p>Very few comments from Statutory or Stakeholders. No issues raised.</p>	<p>This policy remains as it was in JMNP1 and will not be updated.</p>
Policy 9: Town Centre	
<p>Community generally supportive of the policy. Many said that there were some great events and lots of potential which they hoped could be realised.</p> <p>Very few comments from Statutory or Stakeholders. No issues raised.</p>	<p>Development proposals within the town centre and primary shopping areas (see Figure 10) will be supported provided:</p> <p>a. proposals are in conformity with adopted development plan having regard to the NPPF (Chapter 7) and the Town and Country Planning (Use Classes) Order. Local Plan Policy 68. and Development proposals within and at the edge of the defined town centre area should demonstrate how they will make a proportionate and positive contribution to achieving the priority aims of the Melksham Town Centre master plan Report 2023;</p> <p>b. the proposal is in keeping with the scale and character of the centre of this Market Town</p>

	<p>and, where appropriate, preserves or enhances the Conservation Area;</p> <p>c. access to public transport, walking and cycle routes and car parking is considered and addressed;</p> <p>d. where appropriate, a positive contribution is made to conserving and enhancing the appearance and quality of town centre frontages;</p> <p>e. development proposals at edge of centre locations which are and inter-connected with the Commercial defined town centre Area (see figure 10) will, additional to the above, be required to evidence that there are no suitable and viable sites or buildings within the defined Commercial Area;</p> <p>f. where required, planning applications for development or change of use of ground floor frontages within the defined town centre primary shopping area (see Figure 710) where they retain or enhance the continuity of active ground floor shop front uses; and,</p> <p>g. greater use is made of upper floors of town centre premises, including for offices, small businesses and residential use with independent access, will be supported where they sustain or enhance the vitality of the host building use and Melksham town centre. Development proposals for Main Town Centre Uses outside of the defined town centre will be required to demonstrate that there are no suitable and viable sites or buildings within the defined town centre. , in conformity with Core Strategy Policy 38 Local Plan Policy 67. upon its adoption.</p>
Policy 10: Employment Sites	
<p>Community generally supportive of the policy.</p> <p>Constructive feedback with suggestions for small changes from Wiltshire Council.</p>	<p>Proposals for the retention, intensification and reuse of previously developed employment land will be supported in principle, particularly where they will provide space for start-up and small businesses, bringing a range of new employment opportunities. <u>Except where sites are allocated for alternative uses by this plan,</u> proposals will be expected to generate the</p>

Local business representatives also responded to highlight a lack of suitable sites.	same number, or more, permanent full time equivalent jobs as the existing or former use.
Policy 11: Sustainable Transport and Active Travel	
<p>Community generally supportive of the policy. Many highlighted the need for improved bus and train service.</p> <p>Very few comments from Statutory or Stakeholders. No issues raised.</p>	<p>All developments must be planned in line with the Sustainable Transport Hierarchy, including provision for ultra-low emission vehicles. Applications for major development must demonstrate through an effective Travel Plan how sustainable transport modes are maximised and that safe and suitable movement can be achieved for all people. As a key element in the local sustainable transport network, proposals that would achieve further improvements to the accessibility and quality of the links between the wider town and Melksham railway station will be supported. Improvements to the quality of the public realm around the station will also be supported.</p>
Policy 12: Green and Blue Infrastructure	
<p>Community generally supportive of the policy. Many people commented how important natural green spaces are to health and wellbeing.</p> <p>The Environment Agency suggested this policy be updated to cover 'green and blue infrastructure' to align it with the Wiltshire Green and Blue Infrastructure Strategy. Other than to add in the reference to 'blue' this policy is unchanged from JMNP1.</p>	<p>1. Development that will result in the creation of new Green and Blue Infrastructure (GBI) and/or contribute to the protection, management, enhancement and connectivity of existing GBI will be supported; the potential for GBI within the Neighbourhood Area is illustrated diagrammatically in Figure 12.</p> <p>2. Proposals for major developments must:</p> <ul style="list-style-type: none"> a. identify the existing GBI within and around the development site; and, b. demonstrate how GBI has been incorporated into the proposal, and c. assess and address how the proposal will benefit the function and connectivity of GBI through the site and beyond.
Policy 13: Biodiversity	
<p>Community generally supportive of the policy. Some comments on the importance of protecting biodiversity in the face of lots of housing development.</p> <p>Some consultees suggested that the BNG be increased.</p>	<p>Development proposals, including those for field based solar farms, will be expected to deliver at least a 10% improvement (or higher percentages in accordance with national or Wiltshire Local Plan standards as relevant) in "biodiversity value" within and, where appropriate, beyond the site in order to deliver tangible benefits for biodiversity,</p>

<p>WILTSHIRE COUNCIL have recommended that this policy be amended to include a minimum 20% BNG requirement for all relevant developments within the neighbourhood plan area in line with the Wiltshire Local Plan review. However, the Plan Health Check has made clear that it is not appropriate to include specific references to emerging Local Plan policy within the JMNP2 policies as the former are liable to change and the latter could not be effectively implemented as a result.</p>	<p>including specific attention for protected species. Proposals which go beyond the 10% BNG requirement to achieve 20% will be particularly supported.</p> <p>Protection and enhancement of statutory and non-statutory nature conservation sites (as shown on Figure 10) is a priority for the Neighbourhood Area and development proposals must demonstrate sensitive responses to these sites where necessary, such as accommodating a buffer zone.</p>
<p>Policy 14: Open Spaces & Policy 15: Community Facilities</p>	
<p>These policies remain the same as for JMNP1.</p> <p>Community generally supportive of these policies, but many expressing concern at building on green fields and a lack of facilities to match the growing population. Some mentioned the need for a 3G pitch.</p> <p>No comments suggest this change. WILTSHIRE COUNCIL have however requested mention of the Playing Pitch Strategy in the supporting text.</p>	<p>Updates to supporting text made: The Wiltshire Playing Pitch Strategy (PSS) is an important document and is currently being renewed (target completion 2024) - this will identify what needs there are for new pitches and could inform the next version of the plan in line with national planning policy. However, the Action Plan of the current document has been kept up to date on an annual basis. A key action within the plan is the strategic need for a full size 3G Artificial Turf pitch within the Melksham Community Area.</p> <p>This will be referenced in the new neighbourhood plan.</p>
<p>Policy 16: Designation of Local Green Spaces</p>	
<p>Community generally very supportive of the policy with specific comments on many of the spaces.</p> <p>WILTSHIRE COUNCIL as landowner have objected to, or don't support the designation of a number of sites owned by them. Other landowners or agents for some of the sites have objected. Where appropriate, in relation to landowner comments, LGS have been deleted. Two new sites were also added as a result of community feedback. Full details in</p>	<p>The sites shown on figure 15, and listed on page 95 are designated as Local Green Spaces, and will be protected from inappropriate development in a manner consistent with the protection of land within the Green Belt.</p> <p>As such, these spaces will be protected from built development, except in very special circumstances where proposals enhance the existing use of the space, particularly regarding the characteristics that underpin designation as Local Green Space. and do not conflict with the reasons for designation that make it special to the community.</p>

the Local Green Space Report. Two sites were deleted after consultation, the former LGS 6: Cricket and field – community area, Whitley and former LGS 46 Fields/old golf course (behind Christie Miller). All LGS have been renumbered for this version of the JMNP2. LGS49 and LGS50 were added after a local campaign. The area covered by some Local Green Spaces has been updated most notably a field to the rear of Melksham hospital which was included with the old sports pitch to the rear of Champion Drive has been removed from the LGS area. See the Local Green Space Evidence Base Report for detail. The Health Check Report notes that whilst the LGS Designations report contains a helpful spreadsheet addressing the NPPF criteria, it is likely that some of the areas will be subject to particular scrutiny to establish if the designations are warranted.

Policy 17: Trees and Hedgerows

This policy is highly supported by the community. Many commented on the importance of trees, noting where trees have been lost to development and suggesting that more detail is needed and enforcement to protect trees.

Wiltshire Council support the policy and suggested clarification to the last paragraph of Policy 17 as it could be interpreted a number of ways though. Does it imply 20% coverage over the whole development area or 20% of gardens and streets?

'Green Infrastructure Standards for England' (Natural England 2023) paragraph 6.11 advises that on an area wide basis "Urban Tree

Ancient and Veteran Trees:
To be supported, development proposals should ensure that there will be no loss or deterioration of the irreplaceable habitats of ancient woodlands (as shown in Figure 16) and ancient or veteran trees found outside ancient woodland, unless the need for and benefits of the development in that location clearly outweigh the loss. A minimum buffer of at least 15 metres in width should be maintained between ancient woodland and any development boundary. A buffer zone around an ancient or veteran tree should be at least 15 times larger than the diameter of the tree.

Other Existing Trees and Hedgerows:
To be supported, development proposals should ensure that there is no damage to or loss of trees of good arboricultural and amenity value. Existing trees and hedgerows on development sites should be retained where

Canopy Cover is increased by an agreed percentage based on a locally defined baseline and taking into account local needs, opportunities and constraints. Therefore in Melksham the aim is to increase the existing tree canopy cover figure by 8% on development sites of 0.5ha or more to move toward an average cover of 20% for the area (this position is informed by the recent examination of the Chippenham NP).

The Health Check notes: additional reference to tree canopy cover is expressed as an aspirational aim rather than a prescriptive requirement which ensures, based on the evidence, that the policy is reasonable and capable of effective implementation.

possible and incorporated as placemaking features in new development. Where there is an unavoidable loss of trees on site, the number and type of replacement trees should be informed by the quality and size of trees lost. Integration of existing hedgerows into private curtilage must be avoided where possible.

New Trees Increased Tree Canopy: New tree planting in development proposals and throughout the built and natural environments of the Plan area will be supported in principle. ~~Development proposals are encouraged to aim for 20% tree canopy coverage on site where possible – in gardens and in streets.~~ **Development proposals on sites outside of the town centre and greater than 0.5 ha in size that demonstrate an increase in site tree canopy cover of at least 8% will be supported. This should be demonstrated through a tree planting plan. It is expected that this will be delivered through the retention of existing and / or the establishment of new trees in public areas (for example on street, or in green spaces), and in private gardens. Where this is not possible, other green infrastructure features, such as green roofs, should be provided.**

Policy 18: Landscape Character

This policy was not proposed to be updated in JMNP2 - it remained as in the examined and voted upon a referendum JMNP1. However, in response to concerns raised (primarily by CAWS) as part of Regulation 14, minor policy updates are suggested to cover landscape implications of any development proposals.

Development proposals will be expected to:

- a. integrate natural features such as trees, hedgerows and the local river systems that contribute to both the landscape character and setting of the development;
- b. demonstrate that the whole scheme, including hard landscape and planting proposals, draws on local landscape characteristics and features through reference to relevant existing landscape and historic landscape assessments, supplemented by any additional site specific assessments; and,
- c. respond sensitively to the **settlement setting and transition between the settlement their edges and the countryside and maintain the separate identity of settlements; and,**
- d. **conserve or enhance the character, openness, tranquillity and amenity of the open countryside.**

Policy 19: Green Wedges	
<p>This policy is highly supported by the community.</p> <p>This policy was revised as part of the second Regulation 14 Pre-submission consultation and presented for feedback. Feedback from Regulation 14 A from Wiltshire Council expressed concern that the policy was too restrictive. Local businesses also voiced concerns about the restrictive nature of the policy and the impact it would have on their ability to expand / remain in Melksham. The draft policy presented at Regulation 14 B attempted to address the concern of the Local Authority and local business representatives and reflect planning permission granted on one of the Green Wedge areas. Feedback from Regulation 14 B from local businesses was more positive. Wiltshire Council still expressed concern about the restrictive nature of the policy as did landowner representatives. The policy has been revised to address concerns raised in recognition that it needs to be flexible to take account of Wiltshire Local Plan (adopted and emerging) and local economic priorities in particular.</p>	<p>The Green Wedges (mapped in figure 17) are identified in order to:</p> <p>A. provide long-term protection against coalescence;</p> <p>B. protect the setting and separate identity of settlements; and</p> <p>C. retain the existing settlement pattern by maintaining the openness of land.</p> <p>1. Any proposals for development in the Green Wedge will only be supported where they:</p> <ul style="list-style-type: none"> . are in conformity with adopted Development Plan Policies for development outside of the settlement boundaries; . demonstrate delivery of economic, community and/or environmental benefits for the local area which outweigh any harm to the role and function of the Green Wedge (individually or cumulatively) as set out in section 1 of this policy, and detailed in the Green Gap and Wedge Study (2023); . minimise and mitigate urbanising effects, such as artificial lighting and traffic movements; and, . retain (where possible) and add screening trees and hedgerows as edge features to minimise impact on the overall Green Wedge.
Policy 20: Locally Distinctive, High Quality Design	
<p>Community generally very supportive of the policy.</p> <p>Wiltshire Council suggested small supporting text changes. From the Health Check: The requirement for major development proposals to utilise a masterplan to demonstrate suitable design is repeated from the JMNP1 but may be an onerous requirement in modest development proposals and,</p>	<p>Development proposals that contribute positively to the conservation, enhancement and extension of the quality and local distinctiveness of Melksham and Melksham Without will be supported.</p> <p>In addition to having regard to the National Design Guidance and Wiltshire Council design policy, development proposals must demonstrate how they have been informed by the adopted Melksham Design Guidelines and Codes (2023), therefore how they have</p>

therefore, the reasoning for this should be explained in the supporting justification to the policy. The definition of 'major' should be set out in the glossary and, at the least, it would be helpful for the supporting text to explain what a proportionate master plan would be expected to contain.

responded positively to the history and character of the area in which the site is located.

Proposals for major development must demonstrate through a **design and access statement, how the proposed development layout, density, access proposals and building design approach complement and extend the positive characteristics of Melksham and Melksham Without's settlements and landscape, both historic and topographic.**

Policy 21: Local Heritage

Community generally very supportive of the policy. One respondent requested for their home to be added to the list and gave good evidence for it to be added.

WILTSHIRE COUNCIL suggest that this policy should also include below-ground archaeological sites in the considerations that need to be addressed by a planning application. An extra sub-section is therefore suggested to be added to Policy 21 (section e?). This would state that any planning application must not only consider heritage issues but show that they have been fully taken into account via a heritage statement and that archaeological surveys of a particular site may be required prior to the determination of an application.

The Health Check highlighted that the first paragraph is developed from Policy 19 of the JMNP1, but the alterations to the first paragraph have sought to combine statutory considerations. The result is not terribly clear and should be reviewed for clarity, so the paragraph has been reviewed and the JMNP1 wording restored.

Proposals for development within the Melksham Conservation Area and those that ~~may affect listed buildings or structures within the Neighbourhood Plan area,~~ must show how they preserve or enhance the setting, characteristics and special qualities that make up the architectural and historic character.

For other areas of local heritage importance, including archaeological importance, and buildings or structures identified as Non-designated Heritage Assets (as set out in the **2024 Locally Valued Non-designated Heritage Asset Report or subsequent updates), development proposals should demonstrate that appropriate consideration has been given to:**

- a. the significance of the heritage asset;**
- b. its most distinctive and important features;**
- c. the elements of its setting and immediate surrounds that contribute to its significance, and**
- d. the contribution the asset and its setting makes to the character of the local area (whether in a Conservation Area or not).**
- e. any planning application must not only consider heritage issues but show that they have been fully taken into account via a heritage statement. Archaeological surveys of a particular site may also be required prior to the determination of an application.**

Appendix 2 of the Locally Valued Non-designated Heritage Assets Report provides some helpful indicators as to why the assets listed are considered of value albeit some of the entries are short and do not fulsomely explain their heritage significance. It would be prudent to review and expand on Appendix 2 to ensure that the assets cited clearly meet the broad criteria for designation as non-designated heritage assets.