

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

## **Addendum Environmental Report to accompany the Submission Joint Melksham Neighbourhood Plan 2**

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## **1. Introduction**

This is an addendum to the Strategic Environmental Assessment report for the second Joint Melksham Neighbourhood Plan (JMNP2). It has been produced to assess proposed revisions to the site allocations in the Pre-submission Regulation 14B Draft of the JMNP2, and updated to take account of changes to the Plan following the consultation.

The initial main SEA report was prepared in October 2023 to accompany a Regulation 14 pre-submission consultation of the draft JMNP2 (referred to as Regulation14A pre-submission draft JMNP2 in this document). The SEA report was provided by consultants AECOM as part of the Locality Technical Support programme provided to JMNP2 during financial year 2023-24.

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

## **2. Significant Changes to the Draft JMNP2**

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

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

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

Following consideration of representations made during the Regulation 14B consultation in 2024, further less significant refinements have been incorporated into the draft submission plan. This addendum report addresses the revisions made through both stages of the Regulation 14 consultation periods.

## **3. Scope of Revisions for Addendum Assessment**

Three significant revisions to the draft JMNP2 have been proposed after Reg14A and Reg 14B consultations.

### **I. Policy 7.1: Land at Cooper Tires**

In response to additional capacity and viability evidence, the allocation policy proposes revised mixed use allocation including commitment to approximately 100 dwellings to be delivered within the JMNP2 period to 2038 and support for further residential development where this addresses flood risks and supports viable mixed-use re-development.

## II. Policy 7.3: Land South of Western Way, Bowerhill

A proposed new allocation of Land South of Western Way regularises the principle of residential development of this greenfield site that has been established by the November 2023 appeal decision to grant outline consent for 210 dwellings and 70 bed care home. JMNP2 aims to plan positively in the context of these new circumstances and seek to promote and secure the optimum delivery of JMNP2 objectives through the potential phased detailed planning and delivery of this significant site.

In making the allocation, JMNP2 is required to account for the environmental and sustainable development implications of this proposed allocation, including ensuring that it has assessed reasonable greenfield site alternatives in addition to brownfield land being allocated.

## III. Policy 7.5: Land at Middle Farm, Whitley.

This new allocation is proposed in response to further land-owner information and Regulation 14A representations. It is proposed to consolidate previously proposed site allocations 7.3 and 7.4 (as included in the Regulation14A pre-submission draft JMNP2) into a single proposed allocation with a significantly reduced three hectare overall allocation area than the combined area of the two separate sites.

## **4 SEA Addendum Methodology**

This SEA addendum appraises the environmental implications of the proposed amended JMNP2 allocations strategy following consideration of and responses to Regulation 14 consultation representations and significant new circumstances. It does so with regard to the assessment of site allocation alternative approach options A (Brownfield) and B (Greenfield) that were assessed as part of the full SEA process and report.

The addendum assessment is undertaken using the SEA framework and sustainability themes:

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

- Transportation and Movement.

### **Further SEA of Reasonable Greenfield Site Alternatives**

The main SEA report identified the greater sustainability of 'Option A', a brownfield land lead allocations strategy, whilst recognising the greater, but mixed, environmental effects of Option B, a greenfield lead approach.

In relation to site 1025, Land South of Western Way, the proposed allocation has also had regard to the Sustainability Appraisal<sup>1</sup> undertaken by Wiltshire Council as part of its assessment of SHELAA sites in selecting proposed Local Plan allocation sites at Melksham.

The spatial distribution of strategic development within Wiltshire and the Chippenham Housing Market Area, within which Melksham is located, and the identification of larger strategic allocation sites at Melksham has been addressed by the Local Plan. It has set a housing requirement that JMNP2 may address within the Local Plan period.

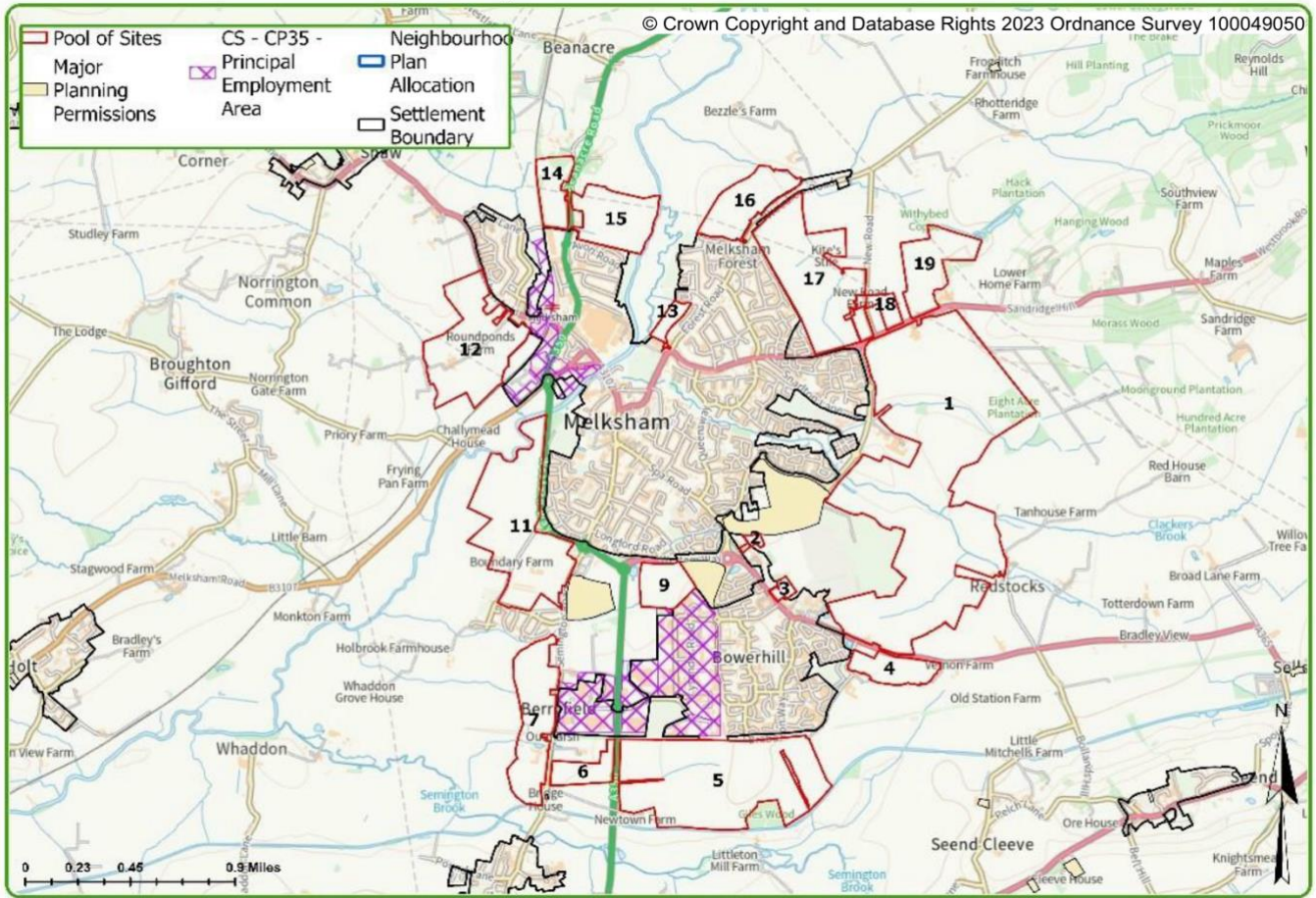
In compliance with the EU Directive 2001/42/EC on the assessment of the effects of certain plans on the environment (the 'SEA Directive'), Wiltshire Local Plan proposed strategy and sites allocations have been informed by a Sustainability Appraisal (SA), incorporating Strategic Environmental Assessment (SEA) meeting the requirements of the SEA Regulations

In resolving allocation sites at Melksham, the SA process assessed 17 reasonable alternative larger sites and site clusters promoted through the Wiltshire Council Strategic Housing and Employment Land Availability Assessment (SHELAA). It identified the likely effects of developing these sites against a range of sustainability criteria which are aligned with those assessed in the JMNP2 full SEA report.

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<sup>1</sup> [https://www.wiltshire.gov.uk/media/12012/Sustainability-Appraisal-Report-September-2023/pdf/Sustainability\\_Appraisal\\_Report\\_September\\_2023\\_formatted.pdf?m=1695901099477](https://www.wiltshire.gov.uk/media/12012/Sustainability-Appraisal-Report-September-2023/pdf/Sustainability_Appraisal_Report_September_2023_formatted.pdf?m=1695901099477)

## 'Reasonable alternative' development sites at Melksham



Site	Site name	SHELAA ref(s)	Site size (Ha)	Approx. range (No. of dwellings)
1	Land to the east of Melksham	3123, 3525, 3552, 3678, 3683, 3692, 3701, 3704, 3752	206.52	4442 - 6223
2	398a The Spa	3249	1.12	28 - 39
3	Land adjacent to Woolmore Manor	3219, 1034	1.72	43 - 60
4	Land to the east of Bowerhill	3345, 3331	10.46	261 - 366
5	Land to the south of Bowerhill	1005, 1006, 3603	76.85	1921 - 2690
6	Land south of Hampton Park	1004	7.83	195 - 274
7	Land to the south of Berryfield	1003, 1019, 1002	27.38	684 - 958
9	Land south of Western Way	1025	10.22	255 - 358
11	Land to the west of Melksham	3105a, 3105b, 3105c, 3105d, 728, 3645	52.06	1301 - 1822
12	Land to the west of Shurnhold	3352, 3310	38.90	972 - 1361
13	Land to rear of Lowbourne Infants School	1000	3.31	82 - 116
14	Land north of Dunch Lane	3243	10.20	255 - 357
15	Land to the north of Melksham	3405, 187	20.60	515 - 721
16	North-West of Woodrow Road & Land Rear of Woodrow	3107, 1001	18.09	452 - 633
17	Land to the north of A3102	715, 1027, 3479, 3478, 3742, 3743	47.28	1177 - 1650
18	Land northwest of Blackmore Farm	3744	3.55	88 - 125
19	Land to the north and west of Manor Farm	3712	18.79	469 - 658

In resolving the allocation of brownfield and some greenfield land within the JMNP2, assessment of all promoted sites was undertaken. This is discussed in detail within the JMNP2 Sites Allocation Topic Paper submitted with JMNP2.

It included:

- Technical assessment of the availability, feasibility and suitability of all promoted sites to identify reasonable alternatives.

It identified 12 small edge of settlement greenfield sites at Melksham and Bowerhill that were potentially suitable alternatives for allocation. All other promoted sites were discounted.

- Site 3738 Verbena Court, Eastern Way: 10 dwellings
- Site 187 Nortree Motors Ltd: 17 – 26 dwellings
- **Site 728 Land to the North of Berryfield: 53 dwellings**
- **Site 1000 Land rear of Lowbourne Infants School: 50 – 112 dwellings**
- **Site 1005 Land South of Sports Ground: Employment**
- **Site 1006 Land South of Falcon Way, Bowerhill: 800 dwellings**
- **Site 3107 North West of Woodrow Road: 77 dwellings**
- **Site 3478 Land North of A3102: 136 – 184 dwellings**
- **Site 3525 Land at Snarlton Lane: 450 – 889 dwellings**
- **Site 3678 Land east of Eastern Way, Melksham: 40 dwellings**
- **Site 3692 Land north of Bath Road: 180 – 240 dwellings**
- **Site 3701 Land to the east of Eastern Way, Melksham: 40 dwellings**

All potentially suitable greenfield site alternatives were subject to further assessment including consideration of:

- Site residential suitability and capacity
- Planning status
- Sequential flood risk assessment of all reasonably available brownfield and greenfield sites.
- Landowner and community consultation.

### **SA/SEA Assessment of Reasonable Alternatives**

In addition to the SEA assessment to inform the “brownfield first” approach of the Regulation 14 version of JMNP2, further sustainability assessment was subsequently undertaken to inform a greenfield site allocation. This had regard to the Sustainability

Appraisal (which incorporated SEA) undertaken by Wiltshire Council of all SHELAA sites. This provided robust sustainability assessment of all larger reasonable alternative sites. These coincided with or incorporated most of those considered by JMNP2. These are highlighted in bold above.

The Sustainability Appraisal of reasonable alternatives concluded that site 1 (Land East of Melksham) and site 9, SHELAA 1025, (Land South of Western Way) were the most sustainable reasonable alternatives.

The Sites Allocation Topic Paper has explained that sites proposed for allocation in Wiltshire Local Plan were excluded from further consideration by JMNP2. This included the majority of Site 1.

Site 1025 was excluded from further consideration by the initial pre-Reg14 sites appraisal process, on grounds of coalescence and conflict with emerging green wedge policy 19. However, the granting of outline consent ref; PL/2022/08504 has changed the circumstances within which the site must be considered by JMNP2. In these circumstances, it remains the most sustainable promoted greenfield site alongside site 3525, Land at Snarltan Farm.

When both are considered in the context of other sites assessment evidence and new circumstances, JMNP2 has resolved that Land South of Western Way should be promoted for allocation to optimise the sustainable development and JMNP2 objectives from its potentially phased development.

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

### **I. Policy 7.1 Land at Cooper Tires**

Policy 7.1 proposes the allocation of the 12.88 hectare brownfield site for the development of approximately 100 dwellings within a mixed use regeneration of the former factory site.

#### **Reason for Revision**

Capacity and local case study analysis has identified capacities for between 60 - 130 dwellings on Flood Zones 1 and 52-110 on land in Flood Zone 2. The allocation commits to delivery of approximately 100 dwellings in flood zone 1 in the JMNP2 period to 2038. It is also supportive of further residential development, subject to addressing flood risk issues, within an agreed master plan and delivery strategy.

Viability assessment has indicated the need to provide support of houses above the capacity of flood zone 1 alone to support a viable mixed use development of the entire site.

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



## **Air Quality**

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

## **Biodiversity and Geodiversity**

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

## **Climate Change and Flood Risk**

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

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

## **Landscape**

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

## **Wellbeing**

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

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

## **Heritage**

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

## **Land, Soil and Water**

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

## **Transport**

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

## **Conclusion**

Housing provision of c100 dwellings across the site is likely to *moderately* increase the sustainable development outcomes of the site.

### **II. New Policy 7.3: Land South of Western Way**

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

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

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

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

## **Reasons for Allocation**

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

The aims of the proposed allocation are:

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

## **Air Quality**

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

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

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

ULEV charging can help mitigate greenhouse gas emissions.

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

### **Biodiversity and Geodiversity**

Greenfield development through Option B has potential to lead to the loss of key landscape features of biodiversity value over a large area and has the potential to disrupt existing ecological corridors. However, it is noted that proposals through Option B would still be required to deliver biodiversity net gains and has potential to deliver more coordinated green infrastructure enhancements through the design of schemes, linking with existing green and blue corridors within the neighbourhood area. Option A is ranked more favourably than Option B.

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

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

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

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

### **Climate Change and Flood Risk**

Greenfield development has potential to deliver more coordinated infrastructure, due to the larger size of available sites, including green energy and active travel infrastructure, to

contribute to reduction in operational emissions. However, it is also likely to lead to a higher dependency on the private car use producing greenhouse gases.

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

This is a smaller site which should produce fewer emissions than a larger one. It is considered that there are opportunities to support resilient development, which supplies energy

efficient buildings and provides investment in renewable energy. It is possible for new development to be in Flood Zone The minor adverse effect of development may be mitigated by:

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

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

### **Landscape**

Impact on landscape character by reducing the amount of open countryside surrounding the town and between settlements, which contribute to the setting and feel of the town. Issues are likely to be more pronounced given the in-combination and cumulative effects resulting from the strategic greenfield site allocations which are proposed through the emerging Local Plan.

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

Mitigations:

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

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

## **Well-being**

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

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

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

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

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

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

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

## **Heritage**

Greenfield development is more likely to locate development away from Melksham Conservation Area and listed buildings and performs well in this respect. However, it is noted that large-scale greenfield development will also impact views into/ out of the town, with potential to negatively impact the setting and significance of the conservation area and listed buildings.

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

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

## **Land and Soil and Water**

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

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

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

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

### **Transport**

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

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

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

Mitigation:

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

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

### **Conclusion**

Allocation Policy 7.3 is proposed in response to the new circumstances of the outline consent establishing the principle of development for c210 dwellings and extinguishing the opportunity for JMNP2 to designate the site as a Green Wedge (reflected in JMNP2 Policy 19R).

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

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

### **III. Policy 7.5: Land at Middle Farm**

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

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

#### **Air Quality**

No impact

#### **Biodiversity and Geodiversity**

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

#### **Climate Change and Flooding**

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

#### **Landscape**

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

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

#### **Wellbeing**

No change

#### **Heritage**

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

#### **Land, Soil and Water**

C50% reduction in removal of valuable agricultural land.

#### **Transport**

No change

## Conclusion

Revised allocation Policy 7.5 retains the allocation amount and approach tested by the main SEA report. It results in moderate reduction to potential harm to landscape, biodiversity and land, soil and water by reducing the total area of allocated land from c6.5 hectares to c3 hectares.

## 6. Effect of Revisions on Alternative Development Scenarios

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

It tested:

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

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

JMNP2 has adopted a brownfield first approach to site allocations at Melksham. New circumstances and evidence have informed the proposed revision of allocation of the Cooper Tires site (Policy 7.1) and the new allocation of a greenfield site, South of Western Way (Policy 7.3)

At Whitley new evidence and in response to Regulation 14A representations, a significant change is proposed to allocation of land at Middle Farm (Policy 7.5).

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

SEA Framework Topics and Criteria	Assessment or Effect of Development
<b>Air Quality</b>	
Option A <ul style="list-style-type: none"> <li>• Promotes the use of sustainable transport by delivering development in the built-up area of the town, within proximity to public and active travel networks.</li> <li>• Potential to incorporate green infrastructure into development with positive impacts on air quality within the built-up area.</li> </ul>	7.1: Cooper Tires – <ul style="list-style-type: none"> <li>• Increased use of most sustainable site.</li> </ul> <p><b>Neutral</b></p>
Option B <ul style="list-style-type: none"> <li>• Potential to lead to the loss of trees and hedgerows (natural absorbers of pollutants) which may exacerbate air quality issues.</li> </ul>	7.3: South of Western Way – <ul style="list-style-type: none"> <li>• Most sustainable reasonably available greenfield site.</li> </ul>



<ul style="list-style-type: none"> <li>• Delivery of new homes at further distance from services and facilities and public transport networks, which may increase the reliance on private vehicles to access the town. This may increase traffic levels on key routes, with associated air quality impacts.</li> </ul>	<ul style="list-style-type: none"> <li>• Potential to mitigate loss of GBI &amp; minimise carbon emissions</li> </ul> <p><b>Minor additional harm</b></p> <p>7.5: Land at Middle Farm –</p> <ul style="list-style-type: none"> <li>• Reduced loss of GBI</li> </ul> <p><b>Moderate benefit</b></p>
<b>Biodiversity &amp; Geodiversity</b>	
<p>Option A</p> <ul style="list-style-type: none"> <li>• Supports the efficient use of land through the reuse of existing structures whilst rejuvenating and remediating areas of previously developed land.</li> <li>• Greater potential for ground contamination and remediation works prior to development, reducing the viability of development.</li> </ul>	<p>7.1: Cooper Tires –</p> <ul style="list-style-type: none"> <li>• Increased viability to address ground contamination.</li> </ul> <p><b>Minor benefit</b></p>
<p>Option B</p> <ul style="list-style-type: none"> <li>• Likely to lead to the loss of greenfield land, including potential areas of best and most versatile land for agricultural purposes, which cannot be mitigated.</li> <li>• Cumulative and in-combination effects likely from the strategic allocations proposed in the wider Melksham area through the emerging Local Plan.</li> <li>• Reduces the amount of open countryside which is potentially contributing to the setting of the existing town by maintaining green gaps and framing views.</li> </ul>	<p>7.3: South of Western Way –</p> <ul style="list-style-type: none"> <li>• Outline consent establishes principle of development.</li> <li>• Allocation will contribute to cumulative loss.</li> <li>• 10% biodiversity net gain</li> </ul> <p><b>Moderate additional harm</b></p> <p>7.5: Land at Middle Farm –</p> <ul style="list-style-type: none"> <li>• Reduced site area-reduced loss. 10% biodiversity net gain</li> </ul> <p><b>Moderate benefit</b></p>
<b>Climate Change and Flooding</b>	
<p>Option A</p> <ul style="list-style-type: none"> <li>• Provides opportunities for enhancing the resilience of the existing built-up area to the effects of climate change (e.g., via green infrastructure enhancements).</li> <li>• Development within proximity to the town centre (i.e., locations within the neighbourhood area with the widest range of services and facilities) will, to an extent, help limit greenhouse gas emissions from transport through encouraging new development in locations with proximity to the town’s amenities and public transport networks.</li> </ul>	<p>7.1: Cooper Tires –</p> <ul style="list-style-type: none"> <li>• Increased delivery and support of GBI viability.</li> </ul> <p><b>Minor benefit</b></p>
<p>Option B</p>	<p>7.3: South of Western Way –</p> <ul style="list-style-type: none"> <li>• No scope for CHP.</li> <li>• No flood risk.</li> </ul>

<ul style="list-style-type: none"> <li>• Potential to deliver coordinated infrastructure, including decentralised energy networks contributing to climate change mitigation efforts.</li> <li>• Greenfield site allocations are likely to increase areas of hardstanding and potentially increase the surface water flood risks to surrounding locations. This may adversely impact the water quality of the River Avon (and its tributaries).</li> </ul>	<ul style="list-style-type: none"> <li>• SUDS potential.</li> </ul> <p><b>Minor additional harm</b></p> <p>7.5: Land at Middle Farm –</p> <ul style="list-style-type: none"> <li>• Reduced site area.</li> </ul> <p><b>Minor benefit</b></p>
<b>Community Wellbeing</b>	
<p>Option A</p> <ul style="list-style-type: none"> <li>• Development on these sites would likely be in areas that can more readily provide easy access to community infrastructure, including employment opportunities.</li> <li>• Potential to enhance the quality of the public realm (as many of the available brownfield sites are likely to contain underutilised structures of varying quality which may detract from the character of the town) and improve the satisfaction of residents with their neighbourhoods as a place to live.</li> <li>• Higher likelihood of integration with existing communities within the existing built-up area of the town.</li> <li>• Recognition that many potential brownfield site options within the town are likely to be relatively small sites which limits the potential to deliver a significant number of new homes at these locations. This may reduce the potential to deliver affordable homes and homes of varying types and tenures.</li> <li>• Complexities of brownfield site options may reduce the viability of bringing them forward for redevelopment (e.g., multiple land ownership issues, or ground contamination concerns associated with former uses).</li> </ul>	<p>7.1: Cooper Tires -</p> <ul style="list-style-type: none"> <li>• Increased housing delivery at most sustainable and connected location.</li> <li>• Increased viability to support facilities.</li> </ul> <p><b>Minor benefit</b></p>
<p>Option B</p> <ul style="list-style-type: none"> <li>• Potential to deliver a wide range of types and tenures due to sites being typically larger in comparison to the available brownfield options.</li> <li>• Potential to deliver green and blue infrastructure enhancements through scheme design, linking with existing corridors and improving connectivity.</li> <li>• Potential to generate developer contributions for community infrastructure enhancements, supporting community wellbeing.</li> <li>• Less potential to deliver more homes in the most accessible locations in the neighbourhood area.</li> </ul>	<p>7.3: South of Western Way –</p> <ul style="list-style-type: none"> <li>• Loss of Green Wedge designation.</li> <li>• Cumulative impact of greenfield loss.</li> <li>• Most sustainable greenfield site.</li> <li>• Delivery of POS and GBI.</li> <li>• Contributions to facilities and services</li> </ul> <p><b>Moderate harm</b></p>

<ul style="list-style-type: none"> <li>• Greater potential (i.e., viability) to deliver additional community and employment uses through mixed-use developments on larger greenfield site options.</li> <li>• Potential impact to local green spaces, green wedges / buffers, many of which are located outside of the town in the open countryside.</li> <li>• Potential cumulative and in-combination effects through taking forward greenfield sites within the JMNP2, given the number of strategic greenfield site allocations likely to come forward through the emerging Local Plan.</li> </ul>	<p>7.5: Land at Middle Farm –</p> <ul style="list-style-type: none"> <li>• Smaller site.</li> <li>• Unchanged amount of housing</li> </ul> <p><b>Minor benefit</b></p>
<p><b>Historic Environment</b></p>	
<p>Option A</p> <ul style="list-style-type: none"> <li>• Potential to directly impact the significance and setting of heritage assets and areas, including listed buildings and Melksham Conservation Area.</li> <li>• Potential to positively impact the setting of heritage assets within the existing built-up area through the regeneration of redundant and underutilised land.</li> </ul>	<p>7.1 Cooper Tires</p> <ul style="list-style-type: none"> <li>• Potential re-purposing of on-site heritage assets including (Avon House (Grade 2) &amp; Former Canteen (Non-designated Heritage Asset) as identified in Cooper Tires Heritage Assessment (D Insall Assoc. 2020)</li> </ul> <p><b>Neutral</b></p>
<p>Option B</p> <ul style="list-style-type: none"> <li>• Delivery of new homes at further distance from nationally designated listed buildings within the town centre.</li> <li>• Potential to indirectly impact the significance and setting of Melksham Conservation Area, including views into / out of the designation.</li> <li>• Impact to locally important heritage assets, given that most of the available greenfield site options are located in Melksham Without Parish, which contains over 400 non-designated (and locally valued) heritage assets.</li> </ul>	<p>7.3: South of Western Way -</p> <ul style="list-style-type: none"> <li>• No direct relationships of site.</li> </ul> <p><b>Neutral</b></p> <p>7.5: Land at Middle Farm -</p> <ul style="list-style-type: none"> <li>• No additional impact.</li> </ul> <p><b>Neutral</b></p>
<p><b>Land Soil and Water Resources</b></p>	
<p>Option A</p> <ul style="list-style-type: none"> <li>• Supports the efficient use of land through the reuse of existing structures whilst rejuvenating and remediating areas of previously developed land.</li> <li>• Greater potential for ground contamination and remediation works prior to development, reducing the viability of development.</li> </ul>	<p>7.1: Cooper Tires -</p> <ul style="list-style-type: none"> <li>• Intensified mixed use of brownfield land. Added viability to support decontamination.</li> </ul> <p><b>Minor benefit</b></p>
<p>Option B</p>	<p>7.3: South of Western Way -</p>

<ul style="list-style-type: none"> <li>• Likely to lead to the loss of greenfield land, including potential areas of best and most versatile land for agricultural purposes, which cannot be mitigated.</li> <li>• Cumulative and in-combination effects likely from the strategic allocations proposed in the wider Melksham area through the emerging Local Plan.</li> <li>• Reduces the amount of open countryside which is potentially contributing to the setting of the existing town by maintaining green gaps and framing views.</li> </ul>	<ul style="list-style-type: none"> <li>• Increases loss of rural agricultural land.</li> <li>• Site not part of rural setting of settlement.</li> </ul> <p><b>Moderate harm</b></p> <p>7.5: Land at Middle Farm -</p> <ul style="list-style-type: none"> <li>• C 3 hectare reduction in development site area and retention of agricultural land.</li> </ul> <p><b>Moderate benefit</b></p>
<b>Landscape</b>	
<p>Option A</p> <ul style="list-style-type: none"> <li>• Protects the open countryside and landscape character by focusing development away from areas with a higher landscape sensitivity.</li> <li>• Prevents urban sprawl effects by allocating sites which are already located within the built-up area.</li> <li>• Provides opportunities to enhance townscape character and visual amenity in the built-up area.</li> <li>• Opportunities to enhance the public realm through regenerating underutilised sites which may detract from the character of the built environment.</li> </ul>	<p>7.1: Cooper Tires -</p> <ul style="list-style-type: none"> <li>• No impacts on designated landscapes.</li> <li>• Residential use adds vitality to new public spaces across currently private site.</li> </ul> <p><b>Minor benefit</b></p>
<p>Option B</p> <ul style="list-style-type: none"> <li>• Potential impacts on proposed green gaps in the neighbourhood area could lead to urban sprawl effects and settlement coalescence / loss of identity.</li> <li>• Greater potential to negatively impact on local landscape character by allocating undeveloped sites on the border of / in the countryside.</li> <li>• Proposals for larger greenfield sites have the potential to positively contribute to wider landscape objectives through sensitive design. For example, delivering net gains in biodiversity and green infrastructure enhancements have the potential to help conserve and enhance landscape and village character, including its special qualities and sense of place.</li> <li>• Larger greenfield sites have the potential to incorporate a landscaping scheme which enhances green and blue infrastructure networks. For example, enhanced habitats (trees, hedgerows, grass, shrub, etc.,) can form important parts of the landscape, and also provide a role in landscape</li> </ul>	<p>7.3: South of Western Way -</p> <ul style="list-style-type: none"> <li>• Loss of potential for Green Wedge.</li> <li>• Localised impacts on settling separation.</li> <li>• No impacts on designated landscapes.</li> <li>• Potential for retention of key landscape features and provision of communal open space.</li> </ul> <p><b>Moderate harm</b></p> <p>7.5: Land at Middle Farm -</p> <ul style="list-style-type: none"> <li>• Reduced landscape impact.</li> </ul> <p><b>Moderate benefit</b></p>

buffering and planting, providing screening to restrict undesirable views.	
<b>Transport</b>	
<p>Option A</p> <ul style="list-style-type: none"> <li>• Promotes the use of sustainable transport by delivering development in the built-up area of the town, within proximity to existing public transport and active travel networks.</li> <li>• Encourages a strategy which would reduce the need to access travel to services, facilities, and amenities.</li> <li>• Potential to readily connect with pedestrian routes and the local road network, with many brownfield sites benefiting from existing access.</li> </ul>	<p>7.1: Cooper Tires -</p> <ul style="list-style-type: none"> <li>• No significant change</li> </ul> <p><b>Neutral</b></p>
<p>Option B</p> <ul style="list-style-type: none"> <li>• Potential to increase the use of private vehicle usage in the neighbourhood area through developing land outside the existing built-up area of the town.</li> <li>• Potential to deliver new footpaths, cycleways and potentially bus services as a result of larger-scale development through greenfield site options.</li> <li>• The proposed A350 Melksham bypass project is likely to connect the south of Bowerhill to Lacock, with intersecting junctions at the A365 and the A3102. In this respect, taking forward greenfield sites for residential uses at locations to the south of the town might undermine the potential for the bypass.</li> </ul>	<p>7.3: South of Western Way -</p> <ul style="list-style-type: none"> <li>• Potential for additional vehicle trips and emissions</li> <li>• Site 900m from town centre. Walking and cycling trips viable/ Opportunities for integration of active and sustainable travel infrastructure.</li> <li>• Pedestrian/cycle access to town centre severed by Western Way. Need for new crossing.</li> <li>• Potential for connection to primary school.</li> </ul> <p><b>Minor harm</b></p> <p>7.5: Land at Middle Farm -</p> <ul style="list-style-type: none"> <li>• No change resulting.</li> </ul> <p><b>Neutral</b></p>
<b>Overall Effect of Revised Allocations</b>	
Option A	<p>7.1: Cooper Tires -</p> <p><b>Moderate benefit</b></p>
Option B	<p>7.3: South of Western Way -</p> <p><b>Moderate harm</b></p> <p>7.5: Land at Middle Farm -</p> <p><b>Moderate benefit</b></p>

## 7. Conclusions

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

Allocation of Land South of Western Way regularises the principle of residential development of this greenfield site established by the November 2023 appeal decision to grant outline consent for 210 dwellings and 70 bed care home. Allocation would result in the loss of agricultural land and soil and remove open greenfield landscape from a valued gap between settlements. However, the site is assessed as a more sustainable reasonably available greenfield site that is capable of enabling the early and viable delivery of a type and tenure of market and affordable housing within 900m of the town centre with capacity for landscape and biodiversity benefits that partially mitigate the impacts. Affordable housing delivery at 30-40% will help ensure JMNP2’s contribution to meeting community wellbeing needs are secured, where viability challenges at Cooper Tires is likely to require a lower level of provision.

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

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