

Ref	Date Received	Sender	Recommendation	Summary
1	07/04/20	Melksham Without Parish Council	13	Withdrawing a proposal from the pre-consultation survey
2	16/04/20	West Ashton Parish Council	CGR	Letter from parish on CGR process, and letter in response, and objections to pre-consultation survey proposal
3	19/05/20	Local resident	11	Objecting to a proposal included in the pre-consultation survey
4	08/06/20	Cllr Christine Crisp	9	Supports recommendation
5	15/06/20	Calne Without Parish Council	9,10	Supports recommendations
6	19/06/20	Local resident	11	Opposes recommendation
7	26/06/20	Local resident	11	Opposes recommendation
8	02/07/20	Local resident	4	Email from local resident to Spatial Planning, with response
9	03/07/20	Local resident	4	Related to 08 - Email from local resident to Spatial Planning, with response
10	25/06/20	Local resident	4	In response to letter from council, also attached, opposed to recommendation and questioning process
11	02/07/20	North Bradley Parish Council	11	Letter from solicitors for parish council, opposing recommendation
12	27/06/20	Local resident	11	Opposes recommendation
13	03/07/20	Local resident	4	Related to 08 and 09 - Email from local resident to Spatial Planning, with response
14	03/07/20	Local resident	11	Opposes recommendation
15	06/07/20	Local resident	4	Related to 08, 09 and 13 - Opposes recommendation
16	06/07/20	Local resident	11	Opposes recommendation
17	06/07/20	Local resident	4	Opposes recommendation
18	06/07/20	Local resident	4	Opposes recommendation
19	06/07/20	Local resident	4	Related to 10 - Opposes recommendation and draws attention to what they believe is an error in the draft recommendations document
20	08/07/20	Local resident	11	Opposes recommendation
21	09/07/20	Wilcot Parish Council	7,8	Supports recommendations

22	09/07/20	Local resident	11	Opposes recommendation
23	09/07/20	Local resident	24	Requests deferment, and includes previous submission for alternative merger option
24	09/07/20	Petition Organiser	9	Comments on recommendation, including reference to responses to pre-consultation survey, and potential options for future division of Calne Without
25	09/07/20	Manningford and Woodborough Parish Councils	5	Supports recommendations, with clarification to exact boundary line along the roads
26	10/07/20	North Bradley Parish Council	11	Opposes recommendation
27	10/07/20	Dr Andrew Murrison MP	11	Responding to comments at 26, opposes recommendation
28	10/07/20	Melksham Without Parish Council	13	Clarifying position
29	06/07/20	Local resident	11	Opposes recommendation
30	08/07/20	Local resident	11	Opposes recommendation
31	10/07/20	Local residents	11	Opposes recommendation (12 signatures)
32	10/07/20	Local resident	11	Opposes recommendation
33	17/06/20	Local resident	11	Opposes recommendation
34	17/07/20	Interested Party	CGR and 11	Comments on CGR process including consideration of alternative proposals, and supporting Parish Council at 26
35	24/07/20	Local resident	11	Opposes recommendation
36	28/07/20	Interested Party	11	Opposes recommendation

From: Teresa Strange
To: [REDACTED]
Subject: MELKSHAM WITHOUT PARISH COUNCIL REQUEST TO WITHDRAW THEIR PROPOSAL FOR Community Governance Review- Scheme 11 SEEND
Date: 07 April 2020 10:13:41

Dear Colleagues

Melksham Without Parish Council met on 9th March 2020 and resolved to withdraw their proposal for Scheme 11 Seend under the CGR process. Please take this email as formal notification of that intention.

I apologise for the delay in passing this information on to you... the unprecedented events of recent weeks has meant that the MWPC Officers' attention has been concentrated on community support and we are only now catching up on parish council business.

Keep safe!

Kind regards,

Teresa

Teresa Strange

Clerk

Melksham Without Parish Council

[REDACTED] (Please ring as texts will not be received as this is diverted to a staff member's 'phone)

From: Teresa Strange
Sent: 11 February 2020 13:14
To: Sue Bond [REDACTED]
Cc: [REDACTED]
[REDACTED]
[REDACTED]
Subject: MELKSHAM WITHOUT PARISH COUNCIL REQUEST TO AMEND THEIR PROPOSAL FOR Community Governance Review- Scheme 11 SEEND (remove Giles Wood)

To: Seend Parish Council
CC: Pauline Helps, Secretary, BRAG
Wilts Cllr Jonathan Seed, Summerham and Seend
Wilts Cllr Nick Holder, Melksham Without South
Wilts Cllr Richard Clewer, Chair, Electoral Review Committee
Community Governance Review officers
Cllr Alan Baines, MWPC

Dear Sue

Melksham Without Parish Council met last night and approved the request of BRAG (Bowerhill Residents Action Group) to remove Giles Wood from their Community Governance Request to move the boundary between Seend and Melksham Without (see attached).

By copy of this email we have also informed the CGR team at Wiltshire Council and the relevant Wiltshire Councillors.

Melksham Without Parish Council would very much like to meet with yourselves to discuss

where the boundary line between Giles Wood and the Bridleway to the picnic area could be redrawn..... perhaps with Cllr Seed and the landowners too if appropriate (from MWPC it would be myself and Cllr Alan Baines). We hope that Seend Parish Council will be amenable to this revised request to Scheme 11.

We look forward to hearing from you.....

With kind regards,
Teresa

Teresa Strange
Clerk
Melksham Without Parish Council
Sports Pavilion
Westinghouse Way
Bowerhill, Melksham
Wiltshire, SN12 6TL
01225 705700
clerk@melkshamwithout.co.uk
www.melkshamwithout.co.uk

Want to keep in touch?

Follow us on facebook: Melksham Without Parish Council or Teresa Strange (Clerk) for additional community news

On twitter: @melkshamwithout

On Instagram: melkshamwithoutpc

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-----Original Message-----

From: Pauline Helps [REDACTED]
Sent: 24 January 2020 11:42
To: Teresa Strange <clerk@melkshamwithout.co.uk>
Subject: Community Governance Review- Scheme 11

Hi Teresa

BRAG had their meeting last night and it was agreed that I send the PC a formal letter to ask them to consider a revised proposal to Scheme 11.

This is attached for consideration. I'll write again with other issues arising from the meeting once I have written out the minutes!

Have a good weekend

Regards

Pauline

West Ashton Parish Council



Please reply to the Clerk – Mrs C Hackett, [REDACTED]
[REDACTED] email: westashtonpc@outlook.com

Email:

philip.whitehead@wiltshire.gov.uk

16th April 2020

Dear Mr Whitehead,

Ref: Community Governance Review

I refer you to the decision notification on Tuesday the 7th April that the government added paragraph 107 to the Planning Practice Guidance which sets out changes that have been introduced to neighbourhood planning in response to the coronavirus (COVID-19) pandemic. The key message is that neighbourhood planning can continue, including consultations subject to compliance with current guidance on isolating. Paragraph: 107 Reference ID: 41-107-20200407 - Revision date: 07 04 2020. All referendum(s) for neighbourhood plans cannot take place until 6th May 2021.

Similarly the Community Governance Review relies on consultation and representation at public meetings, which clearly also should be curtailed because of the COV-19 pandemic and central government guidelines to “Stay at Home” except for essential defined needs.

It therefore seems perfectly reasonable to postpone the Community Governance Review (CGR); it does not make sense to go ahead with the CGR when it is impossible to hold proper consultation meetings with the parish councils, electors and other interested parties when they are unable to make representations. In the Trowbridge area there are three parishes affected by the CGR: North Bradley; Southwick and West Ashton, all would lose large areas of their parishes if the proposals by Trowbridge Town Council are carried through without any opportunity to make a robust case for no change at this time.

I would draw your attention to the letter sent to Wiltshire Council by the solicitors “Thrings” ref: FMQ/W7289-1 on behalf of the three parishes mentioned above that in summary states:-

- The proposed changes are fundamentally premature. Trowbridge Town Council relies on a proposed urban extension and a number of housing allocations to demonstrate a need for a boundary change. Whilst it may be the intention for an urban extension to be delivered, and for housing to be brought forwards on other allocated sites, this is simply at too early a stage for it to form the basis of a boundary change. There is no current justification in terms of size or population to justify severing this land from its current community. Indeed, only schemes 15 and 17 show any substantive change to the predicted population numbers of the areas in question.
- West Ashton is now making progress with its neighbourhood plan, despite the delays caused by the internal issues of Wiltshire Council, and this would largely be undone by the proposed changes.

It is only a few years since the last CGR was carried through and the parishes lost significant land to Trowbridge Town Council and who are now after yet more land even though in the case of West Ashton’s loss there has been no progress on the “Land West of Biss Farm”, formally given planning permission in 1999 for employment. There is very little likelihood of Ashton Park commencing before

West Ashton Parish Council



Please reply to the Clerk – Mrs C Hackett, [REDACTED]
[REDACTED] email: westashtonpc@outlook.com

2025! Therefore any change now, which is opposed by the three parishes, would be premature and grossly unfair in the current pandemic situation and a good reason for an appeal to the Local Government Ombudsman.

Some final points:-

1. Who benefits from the increase in revenues in TTC?
2. The Land West of Biss Farm has had planning permission since 1999 – Persimmon has yet to build on it – It was formally intended to be a business park.
3. Is Ashton Park simply a Persimmon Land Bank?
4. House building rates are only reported as some 120 per year again making any change very premature and will have no effect electoral numbers.
5. In the light of “2” above - What chance is there of a business park ever being built on the proposed West Ashton site in Ashton Park? Indeed, persimmon have now been discussing with planning a change from employment/business to residential.
6. Wiltshire Council’s track record is not good based on the last CGR decision that went against the recommendations of the working group

There is no practical reason why any parish boundary changes are needed or indeed necessary at this time.

West Ashton is opposed to this wholesale land grab by Trowbridge Town Council that is founded entirely in their financial gain.

Yours sincerely,

Richard Covington
Chairman West Ashton Parish Council

Cc:
richard.clewer@wiltshire.gov.uk
andrew.murrison.mp@parliament.uk
[REDACTED]

Cabinet Office
Wiltshire Council
Bythesea Road
Trowbridge
Wiltshire
BA14 8JN
CGR@wiltshire.gov.uk

29 April 2020

Dear Cllr Covington,

Thank you for your letter to the Leader of the Council dated 16 April 2020 requesting details of the ongoing Community Governance Review. As Chairman of the Electoral Review Committee I have been asked to respond.

Community Governance Reviews are conducted under the Local Government and Public Involvement in Health Act 2007, and taking account of statutory guidance prepared by the Secretary of State and the Local Government Boundary Commission for England.

There is a requirement that Wiltshire Council consult appropriately on any draft recommendations that it has prepared, but the method and timing of that consultation is not set out in statute or by the guidance.

For the 2019/20 Community Governance Review the Council through its Electoral Review Committee has undertaken significant levels of engagement and pre-consultation with parishes, interested parties and the public beyond merely consulting upon any draft recommendations.

This has included early engagement with parishes on submitted proposals prior to the commencement of the review, individual sessions with potentially affected parish councils and unitary councillors from potentially affected areas, public meetings on submitted proposals, regular briefing notes circulated to parish councils, an online survey and a physical survey sent to those resident in areas potentially subject to change.

In that context, in which parish councils, electors and other interested parties have had multiple opportunities to make representations on possible options, the Committee believes it is reasonable to proceed with the Community Governance Review process. In particular it notes that a decision would need to be made this year for changes to take effect for the next unitary and parish elections in May 2021. A failure to do so in some cases would in the view of the Committee be detrimental to effective and convenient local governance and/or community identity or interests, and therefore the resolution of this has been determined to be an essential need for some areas.

Further to its meeting on 24 March 2020 at which it formulated its draft recommendations, it is therefore the intention of the Committee to undertake appropriate consultation on an adjusted timetable, taking into account the impact of the current Covid-19 situation.

Presently, it is intended a consultation will take place from 15 May to at least 10 July 2020. This will be by way of briefing notes, press releases, online survey and physical surveys. It should be noted that it is not a requirement of the Act or the Guidance to hold public

meetings or to physically write to those potentially affected, so long as consultation is appropriate. It is therefore not the case that parties would be unable to make representations.

However, the Committee has directed that those who reside in an area should receive a physical communication, which even during the present situation they would be able to respond to with physical mail during their daily exercise or essential activities.

In relation to public meetings, the Committee is keen to hold these if possible whilst still feeling it necessary for a decision to be made by Full Council in September 2020 in order for any changes to take effect for the 2021 elections for reasons as stated above. This is one reason why the consultation period has been pushed back and extended, so that should public restrictions be relaxed to some degree for June, July, or even August, public meetings could be held. If this proves possible, the Council will communicate this with parishes and in briefing notes and press releases, and advise electors resident in potentially affected areas to be alert to the possibility public meetings may be arranged and advertised in such a manner, including potentially extending further the consultation period if possible. Some form of streamed meetings relevant to specific areas may also be possible.

In relation to other points in your letter in opposition to proposals from Trowbridge Town Council, these will be recorded as a representation for future consideration by the Committee. For information, the Committee has not included in its draft recommendations that there be any changes to the governance arrangements of West Ashton.

Yours sincerely,

Cllr Richard Clewer
Chairman of the Electoral Review Committee

Item 3

Further to our earlier telephone conversation about this proposal thank you for your update.

This is just to record my support for Wiltshire Council's decision to REJECT the proposal to move the area including Church Lane, Oldbrick Fields and The Nestings out of Trowbridge and into Southwick.

As I said on the phone residents of this area head south down Firs Hill (A361) past Southwick Country Park and eventually pass the sign 'welcome to Southwick'. These roads are part of Trowbridge on the north side of the green belt, while Southwick lies to the south of it. I could see no sense in the Southwick proposal.

Best regards, S W

8 June 2020

I support the Committee's proposal to reject this application and expressed my views in an email in February, which I attach herewith. I have not changed my view and hope that the Committee will continue to favour rejection of this proposal

Sincerely

Christine

To the Electoral Review Committee

11 February 2020

THE PROPOSAL TO SPLIT DERRY HILL AND STUDLEY FROM CALNE WITHOUT PARISH

I have represented Calne Rural Division since 2009 and the greater part of Calne Without Parish falls within my Division. Various boundary changes over the years have meant that I have represented all areas of Calne Without Parish at one time or another since election to Wiltshire County Council in 1997 and also all the villages surrounding Calne and even parts of the town itself.

I do not support the proposal to make a separate parish of Derry Hill and Studley that is currently on the table. Whilst Derry Hill and Studley would probably be quite self-sufficient as a parish council, I believe the effect on the remaining hamlets would be extremely detrimental. Hardly any of them possess any public meeting places at all. It is true there are the George Inn at Sandy Lane, the Wellington Barn at Calstone, and the Blacklands Leisure Club, but all these are private property.

The register MT2 for Middle Ward Part 2 covers Chilvester Hill (26 electors) on the edge of Calne, the hamlets of Fishers Brook (25 electors), a couple of miles away and Ratford (23 electors) a couple of miles away from both the above. Also on the register is the hamlet of Mile Elm (40 electors) which is on the opposite side of Calne from the above. Also on this register at present is Cherhill Way which is part of the new development which is adjacent to Calne Town and which will become part of the town shortly.

Calne Without Parish is named for the fact that it surrounds Calne Town and it is true that some of the hamlets and villages are remote from one another. Being the largest settlement by far, the parish has managed to be cohesive by focussing on Derry Hill and Studley as the centre for recreation and schooling. If this centre were removed, the outlying settlements would struggle. Should the petitioners be allowed to have their way, I believe the future for the representation of these settlements would be bleak. If it were felt that this was the way forward, I feel a more large-scale upheaval would be necessary. For example, Ratford might be successfully incorporated into Bremhill parish. Chilvester Hill and Lower Compton might be incorporated into Calne town, although there might be some strong objections to that! When the proposal to ally Stockley with Heddington was made at Heddington Parish Council meeting by the instigator of the petition, the response was not favourable – in spite of the names always being coupled by the Heddington and Stockley Steam Rally! Compton Bassett has a successful parish council with only 177 electors, but they have a church, pub and village hall. Lower Compton and Calstone (East Ward Part 1) have 577 electors, but no pub and no hall.

I would urge members to consider that a move to split up Calne Without Parish into smaller groups would require a great deal more thought and planning than has been given to the current proposal. If there are any further questions the Committee might wish to put to me, I will be delighted to answer them.

Christine Crisp

Wiltshire Councillor for Calne Rural Division

item 5

Calne Without Parish Council

Email: clerk@calnewwithout-pc.gov.uk

Cllr Richard Clewer
Chairman of the Electoral Review Committee

15th June 2020

By email: CGR@wiltshire.gov.uk

Dear Cllr Clewer,

Community Governance Review 2019/20 – Consultation on Draft Recommendations

Calne Without Parish Council considered the Electoral Review Committee's recommendations at its meeting on the 8th June 2020 and agreed the following unanimous response.

1. In supporting Wiltshire Council's Electoral Review Committee's draft Recommendation 9, the Parish Council acknowledges that the Electoral Review Committee recognised compelling evidence and support for a new Parish Council for Derry Hill and Studley but that it also saw the need to consider this more broadly in the context of the remainder of Calne Without Parish, the adjacent Parishes and requests for change from Calne Town Council as soon as practicable.
2. In respect of Recommendation 10 the Parish Council supports the recommendation.

I would be grateful if you would keep me informed of progress on this matter and any prospective dates for Council meetings so that I can keep Councillors informed.

Yours sincerely,

S Glen

Sarah Glen
Clerk

item 6

From: [REDACTED]
Sent: 19 June 2020 11:16
To: Clewer, Richard <Richard.Clewer@wiltshire.gov.uk>
Subject: White Horse and Park Wards

We strongly object to Trowbridge Council taking over these wards

Regards [REDACTED]

item 7

From: [REDACTED]
Sent: 26 June 2020 13:22
To: Whitehead, Philip <Philip.Whitehead@wiltshire.gov.uk>
Subject: LAND GRAB

Dear Sir, ref Trowbridge Town Council's proposed boundary changes

My husband and I live in the parish of North Bradley and have done so for a long time. Over the years we have very much enjoyed being part of village life, as we have found it to be a very active community. We are therefore very much opposed to plans to take part of this land. If Trowbridge council is allowed to annex part of our village, you will be destroying part of this enjoyment.

There is also the likelihood of more land grab in future, even if a false promises to the contrary are given .

-We would also like it to be noted that the building of a large number of properties, which include a care ho-me would be better placed on land housing derelict properties in the Town

Yours faithfully

[REDACTED]



Thank you for your email. We understand your concerns, however the references in the Draft Governance Review Recommendations Report are correct as they reflect development that is due to take place in the area. The proposed changes for Showell refer to the proposed development in the adopted Chippenham Site Allocations Plan Policy CH1 South West Chippenham Allocation which includes built development such as housing, employment and community facilities as well as a Country Park. This can be viewed at <http://www.wiltshire.gov.uk/csap-adopt-adopted-may-2017..pdf> (Page 30/31) The site does now have outline planning permissions and reserved matters applications with further details have been and are in the process of being submitted, so this will lead to the sites being developed and built out and will lead to some of the area being more urban in nature.

Regards
Louise

Louise Tilsed
Senior Planning Officer
Spatial Planning Team
Wiltshire Council



From: [Redacted]
Sent: 01 July 2020 14:46
To: Spatial Planning Policy <SpatialPlanningPolicy@wiltshire.gov.uk>
Cc: [Redacted]
Subject: CGR : Scheme 4 Lacock
Importance: High

Dear Sir/Madam

I note from your web page that the *“Spatial Planning Service carries out research and develops the policies that plan for physical, social and economic development in Wiltshire. Mindful of the necessity to protect and enhance our built and natural environment, the spatial planning service works with local communities to deliver change while protecting our heritage for future generations.”* Therefore it is on that note that I believe you may be able to help with a CGR deadline of 10th July 2020.

I represent nine households in Rowden Hamlet, which are currently represented by Lacock Parish Council. With the ongoing Community Governance Review (CGR), Scheme 4 Lacock, there is a significant risk that this rural hamlet which is a World Heritage site with historic records dating back to Lacock in the 13th Century could be transferred to Chippenham Town Council. This transfer is based on an error in the draft recommendations, omitting that Rowden Hamlet is in the heart of the countryside, in a Conservation Area. We have outlined the error below:

The CGR draft recommendations document states that, *“Whilst the areas in question were largely undeveloped at the present time, significant development was projected and the characteristics of the areas would be urban, not rural such as was the case with the remainder of Lacock and Langley Burrell Without parishes, as the parish councils themselves had noted. As a result, though comments including a petition from local residents in the Showell ward had been received emphasising*

community connections with Lacock in that case, the Committee considered that the developing position of the area was such that it would increasingly be more appropriate for it to be transferred within the town boundary."

Whilst this makes reference to the petitions submitted by the residents, it is incorrect to state in the case of Rowden Hamlet that the characteristics of the areas would be urban, since it will remain rural in nature owing to its position in a Conservation Area and at the centre of what is to become Rowden Country Park. If uncorrected, this error could lead to the committee making the wrong decision regarding Rowden Hamlet.

The oversight of the removal of the hamlet from Lacock Parish impacts the local heritage for generations to come and, as such, needs urgent consideration ahead of the CGR deadline of 10th July. It is hoped that Spatial Planning would be delighted that this error has been picked up and would support our case by resisting the proposed change.

Please could you advise of your thoughts. Our ideal would be to have a chance for a zoom call to discuss the matter and know that this error has been identified and corrected.

Kind regards



[REDACTED]

The Conservation Area contained within the South West Chippenham allocation and which is now part of the area included in the draft Community Governance proposals is the Rowden Conservation Area centred around Rowden Manor. It isn't part of the Lacock Conservation Area, which is separate and centred around Lacock Village which is further south and remains in the Lacock Parish Council/Corsham Without area. The reasons why the whole site including the Country Park is included in the proposed changes is explained in the consultation document on Page 13.

The Community Governance Review is not being led by Spatial Planning. It is another part of the Council which is overseeing this review. It is being undertaken in accordance with Community Governance legislation. This consultation provides you with another opportunity to comment on the proposals. A report will then be compiled with recommendations and will then be taken through our Cabinet/Full Council committee process for approval. These meetings are open to the Public to ask questions and attend.

Regards
Louise

Louise Tilsed
Senior Planning Officer
Spatial Planning Team
Wiltshire Council
[REDACTED]

-----Original Message-----

From: [REDACTED]
Sent: 02 July 2020 15:11
To: Tilsed, Louise <Louise.Tilsed@wiltshire.gov.uk>
Cc: Spatial Planning Policy <SpatialPlanningPolicy@wiltshire.gov.uk>;
[REDACTED]
Subject: Re: CGR : Scheme 4 Lacock

Hi Louise

Thank you for your note. I think that the point has been missed that the hamlet we live in houses the Lacock Parish Saxon fort that protects Lacock Church and is part of the same conservation area as Lacock.

Our Parish site cannot be developed, and therefore will not be more urban in nature, but infact, exactly the same as it currently is.

Is there any way that our case or petition can formally be heard?

Kind regards
[REDACTED]

Wiltshire Council,
Bythesea Road,
Trowbridge,
Wiltshire,
BA14 8JN



25 June 2020

Ref.: CGR.25.6.CB

For the attention of: Kieran Elliott, Senior Democratic Services Officer

Dear Mr Elliott,

Wiltshire Council CGR Draft Recommendation 3.3: Lacock

Thank you for your letter dated 12 June, which was in response to my letter of 1 June. Whilst I understand what you say, it still seems wrong to me and the other residents that the proposed change has proceeded to the recommendation stage when the objective of the CGR has not been satisfied. It is stated that the objective of the CGR is to ensure the governance arrangements of town and parish councils continue to reflect the identity and interests of the local communities. Given that every resident who would be affected by the proposed change has objected to it, both by individual responses and through the petition signed by every resident, would you please advise how it fulfils that objective?

In the current lockdown environment, the residents have not been afforded the opportunity for a face-to-face meeting with those driving this change. Whilst you have sought the views of those affected by the change, these have been ignored. Forcing the change through against the will of the residents is undemocratic and warrants independent scrutiny. In your above referenced letter, you say that "...in considering the likely position in five years from the commencement of the review, the positions of the two parish councils, public comments and other evidence and arguments set out in the draft recommendations, the Council determined that the proposal made by Chippenham Town Council should be recommended". Without the opportunity for a face-to-face meeting with the decision makers, it seems the views of the residents affected by the proposal have not been afforded the weighting they deserve. It really feels as if the decision was made before any consultation; as if the consultation process was nothing more than a tick-box exercise. Would you please arrange urgently for a face-to-face meeting with the residents so that this can be discussed before it proceeds any further? This could be performed in a suitably

socially distanced manner in the debating chamber of the Chippenham Town Council offices at Monkton Park.

Additionally, I am still awaiting a response to my letter of 12 February, sent on behalf of all the residents to Mr Cunningham. In that letter I asked what tangible benefits would be enjoyed by the residents as a result of moving from Lacock Parish Council to Chippenham Town Council. This needs to be answered, since without any benefit to the residents, there remains no justification for the change. Would you please address this point too?

In view of the above arguments, and whilst still at the draft recommendation stage, alternative arrangements need to be considered for the residents of Rowden Hamlet as has been the case for Showell Farm.

I look forward to your reply.

Yours sincerely,

A large black rectangular redaction box covering the signature area.A smaller black rectangular redaction box covering contact information.

Democratic Services
Wiltshire Council
Bythesea Road
Trowbridge
Wiltshire
BA14 8JN
CGR@wiltshire.gov.uk

12 June 2020

Dear 

I have been asked to respond to your letter of 1 June regarding the Community Governance Review. I apologise you did not receive a further response to your previous letter. A copy of your letter and petition in respect of the proposals for Lacock and Chippenham parishes was however provided to the Electoral Review Committee ahead of its meeting on 24 March 2020, as was the letter from Michelle Donelan MP on behalf of the residents of Rowden Lane. These documents along with others were also made available in public documentation, and the petition was specifically referenced as having been considered in the Draft Recommendations document.

It is therefore the case that the points raised by yourself and other residents and your interests were fully considered and taken into account. However, in considering the statutory guidance on community governance reviews in particular the need to consider the likely position in five years from the commencement of the review, the positions of the two parish councils, public comments and other evidence and arguments as set out in the draft recommendations, the Committee determined that the proposal made by Chippenham Town Council should be recommended.

As the letter you received indicated this recommendation is currently being consulted upon, and the Committee will be considering any fresh responses and evidence in late July/August in order to form Final Recommendations, which would then be considered by a meeting of Full Council in September. I hope this letter clarifies that the points as raised by your petition were provided to the decision-makers and taken into account, though I appreciate you disagree with the draft recommendation made by the Committee.

Yours

Kieran Elliott
Senior Democratic Services Officer

THRINGS

Community Governance Review
County Hall
Trowbridge
BA14 8JN

2 July 2020

Your Reference:
Our Reference: FMQ/W7289-1

Direct Line: 0117 930 9572

Email: fquartermain@thrings.com

Dear Sirs

Wiltshire Council Community Governance Reviews 2019-2020 – Further Representations on behalf North Bradley Parish Council

As you know, we are instructed North Bradley Parish Councils (“our Clients”) in relation to the ongoing Community Governance Review of boundaries of the Trowbridge Town Council and North Bradley Parish Council.

Previous representations have been made during the consultation on the terms of reference for the Community Governance Review. Our clients have now had the opportunity to consider the Draft Recommendation of the Electoral Review Committee (May 2020). Unfortunately, our Clients continue to have a number of concerns about the proposed changes which do not seem to have been addressed by the Electoral Review Committee. We write to set these continuing concerns out in full with the hope that the Electoral Review Committee will give them proper consideration before the final recommendations are submitted to the Full Council for approval later this year.

Background

1. The Local Government and Public Involvement in Health Act 2007 devolved the power to take decisions about matters around the creation of parishes and their electoral arrangements to local government bodies. Wiltshire Council (“the Council”) is therefore the responsible body for undertaking community governance reviews for those parishes that fall within its administrative area.
2. From 2017-2019 the Local Government Boundary Commission for England (“LGBCE”) undertook an electoral review of the Council. This resulted in a number of recommendations which in turn has led the Council to conclude that a community governance review is necessary.
3. On 9 July 2019 the Full Council of the Council delegated authority to its Electoral Review Committee to undertake community governance reviews. At a meeting on 31 October 2019 the Electoral Review Committee resolved to undertake those reviews subject to published terms of reference (“the ToR”). The ToR include the following:

The Paragon • Counterslip • Bristol • BS1 6BX • Tel: 0117 930 9500 • Fax: 0117 929 3369 • DX: 7895 Bristol
Email: solicitors@thrings.com • www.thrings.com Also in Bath, London, Romsey and Swindon

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“Trowbridge, Hilperton, North Bradley, West Ashton and Southwick.

Review to Cover:

Internal and external boundaries of the Parish of Trowbridge and neighbouring parishes as listed and associated warding and other arrangements in respect of the areas impacts by the LGBCCE final recommendations for the unitary divisions of Southwick, Trowbridge Drynham and Trowbridge Park, and other areas within the parishes of Hilperton, West Ashton, Southwick, North Bradley adjoining the parish of Trowbridge and areas of Trowbridge adjoining the parishes of West Ashton and Southwick.”

4. In March 2010 the Government produced guidance entitled “guidance on community governance reviews” (“the Guidance”). The Guidance is expressly not an authoritative interpretation of the law as it pertains to community governance reviews, however, the Council is required to have regard to the Guidance in reaching any decisions.
5. The Guidance requires that community governance is reflective of the identities and interests of the community in any given area, and that it is effective and convenient. It states that the Council should consider a number of influential factors in its decision making, including:
 - 5.1. The impact of community governance arrangements on community cohesion; and
 - 5.2. The size, population and boundaries of a local community or parish.
6. Consequently, the representations in this letter will focus on the effects of the proposals on those factors.

The Recommendations

7. Following consultation on the ToR a number of recommendations have been published. The recommendations that affect our Client, and against which they object, are set out at Recommendation 11 of the May 2020 Draft Recommendations. This states as follows:
 - 11.1 *That the area of the White Horse ward of North Bradley Parish Council be transferred to Trowbridge Town Council as part of the Trowbridge Drynham ward, coterminous with the Unitary Division of the same name and to be represented by three town councillors.*
 - 11.2 *That the area of the Park ward of North Bradley Parish Council be transferred to the Trowbridge Town Council as part of the Trowbridge Park ward, coterminous with the Unitary Division of the same name and to be represented by three town councillors.*
 - 11.3 *That North Bradley Parish Council be comprised of eleven parish councillors without warding arrangements.*
8. The reasoning for these recommendations is “paragraphs 73,78,80,83,54,85 of the Guidance on Community Governance Reviews”. We anticipate that the reference to paragraph 54 may be a typographical error intended to read “84”, however this does not affect our Clients objections.

Objections

9. We have previously written (dated 24 February 2020) to set out concerns with these proposals. Our Clients continue to have a number of concerns about the proposals and consequently object to the suggested changes.
10. The first ground of concern is that the proposed changes remain fundamentally premature. Simply, there is no current justification in terms of size or population or community cohesion which would justify severing this land from its current community.
11. Whilst development proposals, including those at a “deliverable” stage in planning terms, affect the areas those schemes will take a substantial time to build out. This fact is recognised in the

population assessments undertaken as part of the review process. On any rational assessment, until those new homes are delivered these areas will remain rural in character and have no substantially increased population. Whilst it may be that at a future date these areas should be transferred, that must be a consideration for a future community governance review. To make this change now is unjustifiable.

12. It is relevant that of the schemes which we previously covered in our representations, those which the Councils own evidence suggested a demonstrable population affect within the next five years have not been taken forwards. This indicates that the Council have not properly addressed the issues in making their recommendations.
13. It remains clear that the recommendations affecting North Bradley are pre-emptive of future development plans rather than reliant upon them. Boundary reform that pre-empts development serves to destroy existing social cohesion based entirely upon predicted outcomes rather than current assessments. Fundamentally, it is only once development has occurred that any urbanising effect of community cohesion can be properly assessed.
14. Consequently, a realignment of parish boundaries based upon these assumed developments will be premature and unjustified. Indeed, this prematurity is recognised in the text of the draft recommendations where it confirms that there is a risk that slow development rates might lead to “an unreasonable and unviable ward”¹.
15. The current proposals will only seek to split land from its existing community. There is nothing within the Guidance which would support the severance of rural land from a rural parish for the benefit of a town council. Indeed, the effect of the changes proposed in the recommendations is reduction in the size of parish by some 25%². Further the result of the proposed boundary change is absurd. By following the River Biss and not the current south east border line a long narrow area of land (circa 1.125km long and varying in width from approximately 60m to 250m in width) sits between the West Ashton parish boundary and the proposed new south east boundary of North Bradley parish. This is clearly harmful to community cohesion.
16. Whilst it is accepted that Council Precepts cannot form a consideration in relation to this governance review the application of CIL receipts is a relevant consideration. By seeking to have all prospective development around Trowbridge incorporated within Trowbridge Town Council, the Council is facilitating the pooling of much needed parish resources within the town council. This is to the detriment of our Client and the community that they serve. Consequently, our view is that the proposals will only emphasise the division between the town of Trowbridge and the rural communities around it. This will have a disastrous effect on overall community cohesion.
17. Finally, it is relevant that the adopted Wiltshire Core Strategy 2015 sets great importance on the distinction between Trowbridge and the rural communities around it. It states:
“it is recognised that the villages surrounding Trowbridge, particularly Hilperton, Southwick North Bradley and West Ashton, have separate and distinct identities as villages. Open countryside should be maintained to protect the character and identity of these villages as separate communities. The local communities may wish to consider this matter in more detail in any future community-led neighbourhood planning”

¹ Paragraph 73 of the May 2020 Recommendations

² A plan prepared by local councillors is enclosed which demonstrates this point.

18. Despite this, the Council is now considering a substantial erosion of the separation that exists with large areas of otherwise rural land which contributes significantly to that "separate and distinct" identity absorbed in to Trowbridge on the basis of development potential. This has significant repercussions in terms of the protection of that identity, but also future (and indeed current) neighbourhood planning. Consequently, the proposed boundary changes are directly at odds with the Council's own planning policy.

Conclusion

19. For the reasons set out above, the recommendations in their current form will destroy the existing cohesion in North Bradley with no justification and little identifiable benefit. Simply put there is no rational justification for these proposals in terms of parish size, population, or community cohesion.
20. Whilst it maybe that future development occurs such that the size, population or boundary location in each of these areas would justify a change, to make any changes prospectively and on the basis of a justification provided by development plan documents that are either unadopted or talk about development in the most general of terms would be wholly premature.
21. Consequently, the recommendations in relation to North Bradley should be excluded from the community governance review and the parish boundary should remain as they currently stand.

If we can be of any further assistance in relation to this matter, please don't hesitate to contact the writer on the above contact details.

Yours sincerely,



Thrings LLP

Item 12

Wiltshire Council



27th June 2020.

Sir/Madam

We have a strong suspicion that the members of the Trowbridge Council have strong sympathies to China and Russia. Their behaviour is similar in that you are aiming to take our land which does not belong to you and has not done so since 1894.

We will do all we can to prevent this travesty and preserve the identity of North Bradley and Yarnbrook, because we are sure you have your sights on that. These areas are where we live, where we have bought property and you should take cognisance that opposition to your land grab is strong. It gives the appearance of the London syndrome in swallowing all around the centre and this must not go ahead.


The other serious side to all of this is the question "Where is all the water to come from" More houses less water to the aquifers. The surface water i.e. rivers and streams are drying up with a flow at a minimum. I hope this situation strangles your conscience to know the devastation you are aiming to cause.

Yours faithfully,



c.c. to Robert Jenrick MP. Andrew Murrison. Horace Prickett. Philip Whitehead. Wiltshire Times.
Cllr Roger Evans.

Item 13


This webpage on the Wiltshire Council website provides all the information about the Community Governance Review.

<https://eur02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.wiltshire.gov.uk%2F%2Fcouncil-democracy-cgr&data=02%7C01%7CCommittee%40wiltshire.gov.uk%7C259fc72c9c0c40fa6edf08d81f4fc3bf%7C5546e75e3be14813b0ff26651ea2fe19%7C0%7C0%7C637293774724457619&data=EDk1VJxvOvtSD%2FUW%2FYcYX60C%2B9npuryphTXLQ37DKaY%3D&reserved=0>

The draft Recommendations Report is available to view at

<https://eur02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fcms.wiltshire.gov.uk%2FecSDDisplayClassic.aspx%3FNAME%3DSD4468%26ID%3D4468%26RPID%3D21716557%26sch%3Ddoc%26cat%3D14165%26path%3D14165&data=02%7C01%7CCommittee%40wiltshire.gov.uk%7C259fc72c9c0c40fa6edf08d81f4fc3bf%7C5546e75e3be14813b0ff26651ea2fe19%7C0%7C0%7C637293774724457619&data=eE3wuXGbZJXq8b0pWHVAXH4J4GhsK%2Fbq52BaT2l0dZ0%3D&reserved=0>


Page 12-14 explains the reasons for the proposed changes at Chippenham.

This is the link to where you can submit comments on the Community Governance Review:

<https://eur02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fsurveys.wiltshire.gov.uk%2Fsnapwebhost%2Fs.asp%3Fk%3D158819314903&data=02%7C01%7CCommittee%40wiltshire.gov.uk%7C259fc72c9c0c40fa6edf08d81f4fc3bf%7C5546e75e3be14813b0ff26651ea2fe19%7C0%7C0%7C637293774724467616&data=%2BiqGnWkDLOGFmljFTLx%2FDTTc0wJF3Ok%2FFt2i4aQ%2FAYk%3D&reserved=0>

On the right side on the webpage, a contact email address is provided which is for our Democratic Services Team and who are leading on the Governance Review. They are the team to contact about the Community Governance Review.

Regards
Louise

Louise Tilsed
Senior Planning Officer
Spatial Planning Team
Wiltshire Council


-----Original Message-----

From: 
Sent: 03 July 2020 12:42
To: Tilsed, Louise <Louise.Tilsed@wiltshire.gov.uk>
Cc: Spatial Planning Policy <SpatialPlanningPolicy@wiltshire.gov.uk>;

Subject: Re: CGR : Scheme 4 Lacock

Hi Louise

Thank you for your information below, I'm sure dealing with the public is not the most favoured part of your job but I really appreciate the response.

Can I ask you a couple of things? Firstly, why is Showell remaining in the Lacock Parish?

And secondly, as we are seriously running out of time, are you able to tell me who at Wiltshire Council I should be contacting who is responsible and accountable for the CGR?

We have just simply been concerned with COVID and that the 'public' meetings are not inclusive and that the information endorsed by many interested parties in this matter is acknowledge and we know that this has not just slipped through the net.

I really appreciate your help, thank you.

Kind regard



From: [REDACTED]
Sent: 03 July 2020 10:42
To: Complaints Mailbox <Complaints@wiltshire.gov.uk>
Subject: Moving of boundary at North Bradley

Dear Sirs

As residents of North Bradley, we would like to register our complaint against the movement of the North Bradley boundary which will include the village as part of Trowbridge.

It has always been classed as a rural area and, as such, has not been part of Trowbridge. North Bradley Parish Council have held meetings about neighbourhood plans for building homes in the area, but we do not see why the remainder of the area should be swallowed up to become part of Trowbridge town.

Yours faithfully

[REDACTED]

Dear Mr Elliott

Thank you for your email and furnishing us with the process of the Committee when considering the Final Recommendations for the Full Council to consider in September.

Unfortunately we have not particularly finished with submitting our views due to the fact that surely there has been quite a **significant mistake** in the documentation.

Showell has remained in Lacock Parish despite proposals for quite heavy urbanisation. Not being a planning expert I googled the Taylor Wimpy development for Showell - and indeed, the area looks as though it will be highly developed and urban.

Land at Showell Nurseries

We have submitted an outline planning application for a residential development of up to 100 new homes on land at Showell Nurseries, Chippenham. The application includes the provision of 40% affordable homes, ensuring that local people are able to live and work in the local area.

The land, which is situated near Pottenstein Road, gives us an opportunity to deliver a mixed development of homes, from one-bedroom apartments up to four-bedroom family homes, with parking and public open space.

The proposals submitted to planning Councils reflect the comments made by local people, Chippenham Town Council and Lacock Parish Council.

This site forms a key part of the Wilts & Aveon Growth Strategy as it is part of the extension site to the Chippenham City Allocations (approved in May 2017). The larger Rowden Park proposals have obtained outline planning permission, and we will be working with the developer as they proceed at their next detailed plan to ensure that the sites complement each other.



Our proposed development site is outlined in red in this location plan.

Therefore, the draft recommendations report is incorrect in its assertion Rowden Hamlet will be urbanised as a result of the development:

“Whilst the areas in question were largely undeveloped at the present time, significant development was projected and the characteristics of the areas would be urban, not rural such as was the case with the remainder of Lacock and Langley Burrell Without parishes, as the parish councils themselves had noted. As a result, though comments including a petition from local residents in the Showell ward had been received emphasising community connections with Lacock in that case, the Committee considered that the developing position of the area was such that it would increasingly be more appropriate for it to be transferred within the town boundary.”

The Rowden Hamlet, by contrast, is a rural hamlet in a Conservation Area and as such will remain in the countryside and cannot be developed in to an urban Hamlet.

Additionally, Rowden Hamlet has a history relating to Lacock that dates back to the 13th Century in the form of the Saxon Fort and fortress lines between Rowden Hamlet and Lacock. Rowden Hamlet is listed as a site of national heritage and has always sat in Lacock, in the countryside and cannot become urban due to the conservation status. The residents of Rowden Hamlet have strong links to Lacock and indeed, businesses run by the Rowden Hamlet market themselves on the positioning with the Parish of Lacock.

This begs the question to be raised in to the actual decision making process of;

- a) Maintaining Showell in the Parish of Lacock
- and/or
- b) Removing the 8 houses of Rowden Hamlet from the Parish of Lacock

Which leads the conclusion that there has to be a mistake. Rowden Hamlet has further claim and criteria than Showell, to be granted the same exclusion as the Showell nurseries area.

Therefore, please could you advise of the best course of action to ensure we have an owned, observed and balanced view of the deciding factors in the decision making. We cannot just fall back on Acts and Government legislation that are somewhat hidden and behind closed doors. The case is very clear, the Rowden Hamlet have been mis-represented in the draft recommendations and should remain in the Parish of Lacock.

Yours sincerely,

A black rectangular redaction box covering the signature area.

Item 16

From: [REDACTED]
Sent: 06 July 2020 12:00
To: Whitehead, Philip <Philip.Whitehead@wiltshire.gov.uk>
Subject: Fw: Wiltshire Council taking part of North Bradley . . .

Subject: Re: Wiltshire Council taking part of North Bradley . . .

Hello Mr Whitehead,

We are writing to ask for your help in stopping the proposal from Wiltshire Council to take over a large part of the White Horse ward of North Bradley to transfer to Trowbridge Town Council as part of the Trowbridge Drynham Ward.

We are an active village community with a fantastic school that would not be able to expand to take more children, and a beautiful village church. We have had a number of fairly new housing developments which are in keeping with our village so they have not been intrusive. As we are a village community, we are a friendly village and this has been demonstrated recently in the Corona virus outbreak when a volunteer group was quickly set up to help vulnerable residents with shopping etc. I am sheltering as I am on the Government at risk register because I have T-cell large granular lymphocytic leukaemia, and for the past 16 weeks a lovely young couple have done our shopping, an example of our village community spirit.

We understand that life cannot stand still and changes will be made as the years go by, but my husband comes from Manchester and he is really annoyed that we would be losing our village identity as has happened over the years with the smaller villages and towns around Manchester which now come under Greater Manchester. We do not want North Bradley to lose its village status and become another part of Trowbridge, which is a start if this takeover is allowed to happen.

Please do all you can to stop this takeover of a large part of North Bradley by Wiltshire Council happening to our village.

Thank you, Mr Whitehead,
Yours sincerely,

[REDACTED]



5 July 2020

Wiltshire Council,
Bythesea Road,
Trowbridge,
Wiltshire,
BA14 8JN
[For the attention of Kieran Elliot, Democratic Services]

SENT BY EMAIL AND POST

Dear Mr Elliot,

I refer to the CGR consultation letter sent to me on 14 May 2020 and I respond to the draft recommendations therein.

I disagree with your recommendation 3.3 for a number of reasons:

1. You appear to have ignored the previous objections of every resident in this Rowden hamlet area that you propose to merge. As a local community with a strong and historic affinity with Lacock we had all lodged objections to the loss of our democratic right to remain under Lacock local governance.
2. You have not achieved the objective of your CGR as your recommendations do not reflect the identity and interests of our local community.
3. Nor is this hamlet representative of an urban area. We live in a very rural country environment within a designated Conservation Area, disconnected from the increasing urbanisation of recent housing and commercial developments that have encroached on the farmland - green belt. The so-named "Rowden Country Park" that has been ring-fenced by such development will maintain a buffer and hopefully permit our hamlet to retain its rural and obvious non-urban status.
4. It would appear that a convenient line has been drawn along the proposed Southern Relief Road and all land inside presumed to be taken under Chippenham's urban governance. Showell Farm - within the Showell Ward of Lacock - will not be transferred to Chippenham local governance despite its industrial and residential development boundaries. However Rowden hamlet within the same ward is surrounded by open fields and so it is therefore logical to also leave its local governance within Lacock.
5. To leave Rowden hamlet under Lacock's governance retains Wiltshire's commitment to the principles of the Conservation Area that was established to protect the rural and historic nature of the hamlet. To absorb the hamlet into the urban area of Chippenham goes against these principles.
6. A change to our local governance would be seen as a reduction in Wiltshire's commitment to climate change initiatives.
7. There are no material benefits to your proposed change - we have a private unmaintained road, a private sewer and no urban facilities such as street lighting, cleaning nor an acceptable broadband service.

Please reconsider your recommendations and leave the Rowden hamlet under the continuing local governance of Lacock.

Yours sincerely,



CC - Cllr Richard Clewer, Chairman of the Electoral Review Committee



Item 18

Dear sirs

I am writing in support of Rowden Hamlet remaining within the parish of Lacock. Fellow residents have expressed the reasons for this with great eloquence and have offered historical background evidence. I wish to add my name to the list of residents who feel strongly that we remain a rural hamlet. We are within a conservation area and a site of historic significance and as such need to maintain our rural status and our historic connection with the ancient parish of Lacock.

It is important that the river valley area is protected against further urbanisation in order to preserve the historic and environmental treasures it contains. As such the parish of Lacock will benefit from the council tax it receives from Rowden Hamlet far more than the comparatively vast parish of Chippenham can benefit from just 8 more houses contributing to its coffers.

I hope that the final decision for the parish boundary will result in Rowden Hamlet remaining in its rightful and historical place within the parish of Lacock.

Yours sincerely

A solid black rectangular box used to redact the signature of the sender.

Item 19

Dear Mr Elliott,

Further to my letter, reference CGR.25.6.CB, dated 25 June 2020, I feel it is important to draw your attention to an error in the Community Governance Review 2019/20 Draft Recommendations document, dated May 2020. Paragraph 25 of the document states:

“Whilst the areas in question were largely undeveloped at the present time, significant development was projected and the characteristics of the areas would be urban, not rural such as was the case with the remainder of Lacock and Langley Burrell Without parishes, as the parish councils themselves had noted. As a result, though comments including a petition from local residents in the Showell ward had been received emphasising community connections with Lacock in that case, the Committee considered that the developing position of the area was such that it would increasingly be more appropriate for it to be transferred within the town boundary.”

Whilst this correctly makes reference to the petitions submitted by the residents, it is incorrect to state in the case of Rowden Hamlet (Showell Ward) that the characteristics of the areas would be urban. Rowden Hamlet will remain rural in nature owing to its position in a Conservation Area and at the centre of what is to become Rowden Country Park. If uncorrected, this error could lead to the committee making the wrong decision regarding Rowden Hamlet.

Rowden Hamlet, at the centre of Rowden Country Park, will be considerably less urbanised than the Showell nurseries area, which, it is noted, will continue under the governance of Lacock Parish Council. The same exception should be afforded Rowden Hamlet and, indeed, the whole of Rowden Country Park.

I have already notified Jonathon Seed (member, Electoral Review Committee) and Jane Durrant (Chair, Lacock Parish Council) of this error, but would you please ensure that the members of the Electoral Review Committee are formally advised of the error in paragraph 25 so that the committee will be better able to make an informed decision?

Thank you and regards,

[Redacted signature]

[Redacted contact information]

Item 20

From: [REDACTED]
Sent: 08 July 2020 13:44
To: andrew.murrison.mp@parliament.uk
Cc: Whitehead, Philip <Philip.Whitehead@wiltshire.gov.uk>; jenrickr@parliament.uk
Subject: Trowbridge Council taking the land of the North Bradley Parish

Dear Sirs,

We write to object against Trowbridge Council's intentions to grab land belonging to the parish of North Bradley. The only possible reason for this is, of course, to increase revenue.

We have reluctantly agreed to the proposed Neighbourhood Plan but now suddenly and perhaps rather sneakily Trowbridge Council want to take the area suggested in the plan. The plan allows for a gap of fields that should not be built on keeping the North Bradley parish separate and protecting and preserving wildlife. Perhaps because of the Covid-19 pandemic it provided the council with an ideal opportunity of a virtual get together to make decisions knowing most people are isolated and unable to get to meetings, discussions etc.

Whether the Town Council buy the land to build on, with proposed planning or already built upon is irrelevant. Once they have the land they will not stop until the entire area dividing North Bradley from Trowbridge is built on. Parishes such as North Bradley should be preserved and kept distinct and separate from town/urban areas. We moved from Woking in Surrey to North Bradley on retirement, to get away from the constant rush and busyness of the urban surroundings. But it seems the Government are intent on digging up our 'green and pleasant land' in order to spread the urban sprawl vast and wide destroying wildlife habitat, the preservation of the countryside and the destruction of individual communities making them into yet another vast busy faceless urban area.

Living in Woodmarsh, North Bradley we enjoy keeping bees at the bottom of our garden which overlooks fields behind the White Horse Business Park. We are visited by a variety of birds, hedgehogs, bats and grass snakes and have seen Roe deer in the field behind us. Why does this have to be taken away from us? Where do people go to find peace and quiet free from anxiety and stress?

There are so many buildings (brown sites?) in Trowbridge which could be converted into housing; old mills, Bowyers site and other old buildings which are standing rotting away. If we have to have building then this is the place to put it. But no it is far easier, cheaper and more convenient to buy up the green land and build upon it. This doesn't make Trowbridge Council look good since they are blatantly ignoring these potential brown sites with which they could tidy up and make something of and for their town. No, the easy option is to destroy the countryside leaving their rubbish behind as an eyesore.

There has been very little unemployment so anyone coming to live here would just be using it to commute outside the area. How does that help our environment? More noise, traffic and air pollution to be added to the atmosphere and our parish. It is not wanted. Neither are the actions of Trowbridge Council to take over our village.

Yours sincerely

[REDACTED]

Item 21

Good afternoon,

Wilcot and Huish (with Oare) PC supports the following recommendations:

7.1 That the area shown above be transferred from the parish of Pewsey to the parish of Wilcot, Huish and Oare (see Recommendation 8.3).

7.2 That the Electoral Divisions of Pewsey Vale West and Pewsey be amended to be coterminous with the parish boundaries of Pewsey and Wilcot, Huish and Oare.

8.1 That the parishes of Wilcot and Huish be merged into a single parish.

8.2 For the combined parish to have no warding arrangements, with nine councillors.

8.3 For the combined parish to be called Wilcot, Huish and Oare.

The Parish Council wishes me to thank you for ensuring the Review and resulting Draft Recommendations accurately reflect the Parish Council's concerns and wishes in this matter.

Thankyou,

Ruth Kinderman, Clerk, Wilcot&Huish (with Oare) PC

Item 22

[REDACTED]

25 June 2020.

Council Leader - Cllr Philip Whitehead
Wiltshire Council
County Hall
Trowbridge,

philip.whitehead@wiltshire.gov.uk

Dear Cllr. Whitehead,

Governance Review – North Bradley Parish, Wiltshire

I am greatly concerned at the proposed 'land grab' of approximately 25% of the parish of North Bradley to Trowbridge Town Council in the proposed Governance Review. The Parish Council has existed in its present shape since 1894 and has, I believe, served the residents well and they deserve better consideration from their County Council.

The fields, that runs alongside the Woodmarsh Road, which act as a buffer between Trowbridge and the village of North Bradley has specific reference made to them in Wiltshire Councils Core Strategy, which states that the Parish's of *'Southwick, West Ashton, **North Bradley** have separate & distinct identities as villages. Open countryside should be maintained to protect the character & identity of the villages as separate communities'* The proposed transfer to Trowbridge Town Council does not allow the Parish to retain its identity. Is Wiltshire Council Core Strategy not fit for purpose? Can it be ignored, overruled? The transfer proposals will destroy the parish with no visible benefits to the parish/residents as a whole.

North Bradley Parish Council has a Neighbourhood Plan, at Regulation 16 and their referendum had to be cancelled due to the pandemic. However, the consultations for the Governance review continued. The normal consultations did not take place and meeting dates were confined to Briefing Notes and nothing else. With the pandemic it was obvious that attendance would be very limited. I feel the pandemic was an opportunity for the Council to technically 'bury bad news'.

I believe the changes are also premature? There is no justification for the transfer of these green fields which have no properties on them so little if any revenue. These fields have approval from North Bradley's Neighbourhood Plan for a small development of 175 properties, to the North of the fields, leaving the bulk of the fields green space and including a bat corridor for protected species. I can only suppose that Trowbridge Town Council has its eye on this potential development as a money earner, which I have serious doubts would they would benefit the Parish with.

I have not explained all my objections but hope this letter is sufficient for you to realize the feeling I have at Trowbridge Town Councils blatant attempt to take part of the Parish of North Bradley. Also their lack of concern for the residents and the identity of the Parish of North Bradley, which I certainly hope are not shared by Wiltshire Councillors.

Yours sincerely,

[REDACTED]

[REDACTED]

Copy to Kieran Elliott W.C. 9.7.19

Item 23

Good afternoon Kieran

I hope you are keeping safe and well.

I have refrained from submitting comments on the Recommendations until the last moment because I wanted to see if full engagement with the issues was possible. I have now completed and submitted the SNAP survey form with an updated view.

The submission that I lodged on 30th November 2019 remains valid. I attach it again

However some of it has been overtaken by decisions taken since, which directly impact on consideration of Recommendations 12 and 13 - for example:-

- (a) the impact of the COVID-19 lock-down in diverting public attention from proper consideration of the issues and restricting opportunities for proper public engagement in the decision making;
- (b) the government allocation of £135m funding for a by-pass round Melksham;
- (c) the publication and Regulation 14 consultation of the Melksham Neighbourhood Plan encompassing both the Town and parish boundaries
- (d) further applications for new housing development
- (e) evidence of the high level of inter-dependency in addressing the need for the Melksham community.

For that reason, I believe the Council should consider a new option - to defer any decision of Recommendations 12 and 13 until 2021 to allow proper public engagement and consideration of this matter.

Best wishes

[Redacted signature]

10th July 2020

COMMUNITY GOVERNANCE REVIEW
Melksham Town, Melksham Without Parish and Seend

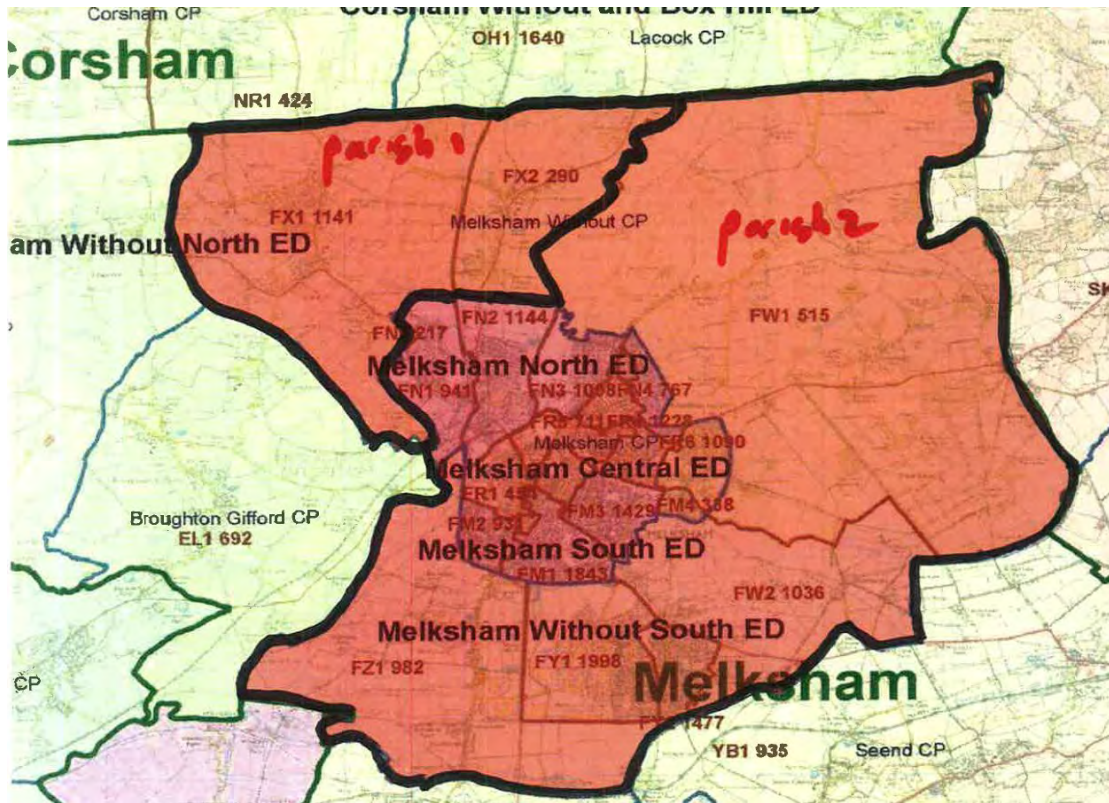
The Case for integrating the areas of
Berryfield, Bowerhill and East of Melksham
to create a new single Melksham Council

Including

- (B) creating a new Parish of Beanacre, Shaw and Whitley
- (c) transferring the BRAG land from Seend for inclusion in a new Melksham Council boundary

Prepared by

N W



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PROMOTING COMMUNITY COHESION: The Case for one integrated Council for Melksham

COMMUNITY GOVERNANCE PROPOSAL

- 1. Dissolve both Melksham, Town and Melksham Without Parish Councils;**
- 2. Create a single integrated Melksham Council within the Polling Districts boundaries of (see map):**

Melksham Town:	FR1, FR2, FR3, FR4, FR5, FR6, ZY1, ZZ1, ZZ2, ZZ3, ZZ6	4,421 voters
	FN1, FN2, FN3, FN4, FN5, ZY2, ZY3, ZZ7	4,308 voters
	FM1, FM2, FM3, FM4, ZZ4, ZZ5, ZZ4, ZZ8	4,571 voters
Melksham Without Parish: FZ1, FW1, FW2, FY1, FY2		6,008 voters
with TOTAL CURRENT ELECTORATE (excluding new housing development) 19,308 voters		
- 3. Review the number of Wards**
- 4. Create a new separate Parish to include the historic villages of Beanacre, Shaw and Whitley, with a combined current electorate within Polling Districts of FX1 and FX2 of 1,431;**
- 5. Transfer all the 'BRAG' land from Seend Parish into the proposed new Melksham Council area**

THE PROPOSAL

1. Melksham is a long established market town, surrounded by agricultural farming land. In 2019, Melksham celebrated the 800th anniversary of the granting of a Royal Market Charter. Third tier civic governance is currently provided by Town and Parish Councils; derived from the former Urban and Rural District Councils serving the industrial and agricultural nature of these former communities.
2. However, new development in the Melksham area has seen rapid growth over recent years to the point that it already exceeds Wiltshire Council's 2026 housing projection. More new housing estates are currently under development, being occupied or in the pipeline – particularly to the east and south of Melksham area.
3. All these developments adjoin existing housing in Melksham or the commercial and industrial premises on the large Bowerhill and Hampton trading estates. They are built on green field sites, which effectively closes the rural green buffer between Berryfield, Blackmore, Bowerhill; and the town, and further contributes to the further urbanisation of the entire Melksham local community.
4. Melksham Without Parish Council (MWPC) has already transferred 750 new East of Melksham houses to the Town Council; and it is understood that in response to this community governance review is proposing to similarly transfer the 100 Sandridge Place houses and the 450 new houses under construction East of Melksham. ²
5. Wiltshire Council has long included Bowerhill with town for planning purposes. It's plans to achieve government demands for more houses in the period to 2036 is to transfer Melksham into the Chippenham Housing Market Area, which has a revised target of around 22,500 new houses – possibly with around 3,000 in the Melksham area. ³

6. Data produced by Wiltshire Council in August 2018⁴ suggested that the number of voters in each Polling District within the proposed integrated Melksham Council boundaries (as shown in the Map on page 2) is as indicated in the TABLE A below:

TABLE A

The proposed Integrated Melksham Council boundary – by Polling District

WiC ED	Ward Description	Polling District	Estimated Voters		Suggested New Ward
			2018	2024	
96	Melksham South 1	FM1	1721	1843	Melksham South
98	Melksham South 2	FM2	897	931	Melksham South West
96	Melksham South 3	FM3	1377	1429	Melksham East
95 /96	Melksham South 4	FM4	326	338	Melksham South East
96	Melksham South 5	ZZ4	132	137	Melksham South West
96	Melksham South 6	ZZ5	536	556	Melksham South West
96	Melksham South 7	ZZ8	0	0	Melksham Central
94	Melksham North 1	FN1	684	941	Melksham North West
94	Melksham North 2	FN2	1101	1144	Melksham North West
97	Melksham North 3	FN3	969	1008	Melksham North East
97	Melksham North 4	FN4	739	767	Melksham North East
94	Melksham North 5	FN5	35	217	Melksham North West
97	Melksham North 6	ZZ7	184	191	Melksham Central
97	Melksham North 7	ZY2	4	4	Melksham North East
97	Melksham North 8	ZY3	6	6	Melksham North East
94/98	Melksham Central 1	FR1	431	454	Melksham North East
97	Melksham Central 2	FR2	674	702	Melksham Central
98	Melksham Central 3	FR3	39	40	Melksham Central
98	Melksham Central 4	FR4	1183	1228	Melksham Central
98	Melksham Central 5	FR5	648	711	Melksham Central
97	Melksham Central 6	FR6	1018	1090	Melksham East
97	Melksham Central 1	ZY1	2	2	Melksham East
96	Melksham Central 7	ZZ1	10	10	Melksham South West
96	Melksham Central 8	ZZ2	0	0	Melksham South West
97	Melksham Central 9	ZZ6	191	198	Melksham East
96	Melksham Central 1	ZZ3	0	0	Melksham South West
94	Blackmore 1	FW1	308	515	Melksham North East
95	Blackmore 2	FW2	156	1036	Melksham South East
95	Bowerhill 1	FY1	1484	1998	Melksham South
95	Bowerhill 2	FY2	1423	1477	Melksham South West
93	Berryfield	FZ1	654	982	Melksham South West
	TOTAL		16,934	19,955	
	AVERAGE PER WARDS (x7 Average per Councillor @ x3 ward		2,418 806	2,850 950	

7. The PARISH 2 proposal below assumes that the Melksham Council has **SEVEN** Wards each with an average voter range of around 2850 by 2024 to take account of planned new housing development. It is suggested that each Ward should have **THREE** Councillors – electing a total of 21 Councillors in total every four years – with the number of extra voters in the proposed Melksham South Ward being addressed by having extra Councillors elected - say 4 or 5 - in order to maintain balance with the average per Councillor.

8. A Suggested Ward structure with two options for seven and five Wards in a new integrated Melksham Council is detailed in the following TABLE B.

TABLE B

Proposed Ward Allocation for New Integrated Melksham Council

WC ED	Suggested Ward Description	Polling District	Estimated Voters 2018		Estimated Voters 2024		Cllrs
94	Melksham North Split approx 20: 80	FN1	684	1900 (633)	941	2392 (797)	3
		FN2	1101		1144		
		FN5	35		217		
		FR1 (part)	80		90		
	Melksham North East	FN3	969	2403	1008	2691	3
		FN4	739		767		
		FW1	308		515		
		ZY1	2		2		
		ZY2	4		4		
		ZY3	6		6		
		ZZ6	191		198		
		ZZ7	184		191		
	Melksham East	FM3	1377	2723	1429	2859	3
		FM4	326		338		
		FR6	1018		1090		
		ZY1	2		2		
	Melksham South West	FM2	897	2229	931	2616	3
		FZ1	654		982		
		ZZ1	10		10		
		ZZ2	0		0		
		ZZ3	0		0		
		ZZ4	132		137		
		ZZ5	536		556		
	Melksham South **	FM1	1721	3205	1843	3841	3, 4 or 5
		FY1	1484		1998		
	Melksham South East	FW2	156	1579	1036	2513	3
		FY2	1423		1477		
	Melksham Central Split approx 80: 20	FR1 (part)	345	2544	363	2681	3
		FR2	674		702		
		FR3	39		40		
		FR4	1183		1228		
		FR5	648		711		
		ZZ8	0		0		
			TOTAL	16,934	TOTAL	19955	21 - 23

** Melksham South - extra voters could be addressed by having additional Councillors – either 4 or 5

Suggested Ward Allocation for New Integrated Melksham Council

Based on guidance provided in answer to my question at the 14th February pre-consultation meeting in the Assembly Hall, Melksham I have tried to allocate Polling Districts and the number of Councillors per ward to the revised boundaries authorized by the Electoral Boundaries Commission.

TABLE B(ii) below assumes that Option 24(c) is proposed to create a new Shaw, Whitley and Beanacre Parish Council.

The proposed Wards or a new integrated Council is detailed in the following:-

TABLE B(ii)

ED	Suggested Ward Description	Polling District	Estimated Voters 2018		Estimated Voters 2024		Cllrs
94	Shaw and Whitley Beanacre Parish Council	FX1 FX2	1094 279	1373	1141 290	1431	tba
94	Melksham North Split approx. 20: 80	FN1 FN2 FN5 FR1 (part) FW1 FZ1	684 1101 35 80 308 654	2862 (573)	941 1144 217 90 515 982	3889 (972) (778)	4 or 5
95	Split approx 20: 80 Melksham South East	FM4 (part) FW2 FY1 FY2	65 156 1484 1423	3128 (625)	67 1036 1998 1477	4578 (915) (763)	5 or 6
96	Melksham South Split approx. 80:20	FM1 FM3 FM4 (Part) ZZ1 ZZ2 ZZ3 ZZ4 ZZ5 ZZ8	1721 1377 326 10 0 0 132 536 0	4102 (683)	1843 1429 338 10 0 0 137 556 0	4313 (862) (718)	5 or 6
97	Melksham East	FN3 FN4 FR2 FR6 ZY1 ZY2 ZY3 ZZ6 ZZ7	969 739 674 1018 2 4 6 191 184	3787 (757)	1008 767 702 1090 2 4 6 198 191	3968 (992) (796)	5 or 6
98	Melksham Forest Split approx. 80 :20	FM2 FR1 (part) FR3 FR4 FR5	897 345 39 1183 648	3112 (659)	931 363 40 1228 711	3273 (818) (692)	4 or 5
			TOTAL	16991	TOTAL	20021	23 or 27

9. The integrated Ward proposals above seeks to relate adjoining Polling Districts - regardless of their original Town / Parish allocations - to seek a approximate equal balance in the number of voters served by any one Councillor – shown in brackets (voter / Councillor ratio in BLUE).
10. Population growth projection data from various sources for the Melksham Community Area suggested a rise from 24,100 (2006) to 26,590 (2011) and then up to 29,810 (2026) ⁵.

The 2011 census showed the actual population was 28,343 ⁶, which already exceeds the 2026 projection used to plan facilities and services, and more recent 2018 ONS data indicates this has risen again to 30,867.⁷

11. In order of size of populations by civil parish in Wiltshire, Melksham Town ranks as 7th and Melksham Without Parish is 17th. However, the combined total of one integrated Melksham Council (24,052) would rank as the 4th largest population in Wiltshire - after Salisbury, Trowbridge and Chippenham.⁸

INTRODUCTION

12. Wiltshire Council describes Melksham as “ one of Wiltshire’s oldest towns “⁹. Originally a Saxon settlement on a ford across the River Avon, in medieval times Melksham became a centre for a range agricultural and wool-based cloth weaving activity. It was surrounded by farming land and served as a royal forest during the Middle Ages.
13. As the weaving industry started to decline during the early 1800s, Melksham evolved to use the closed mills along the River Avon for manufacturing purposes. In 1940, the Royal Air Force took over agricultural land in the Bowerhill area to create No 12 Technical Training School and also the Berryfield area became married quarters housing.
14. When the RAF closed these training facilities during the mid 1960’s, the land did not revert to farming but was used instead to build housing and industrial estate premises for distribution, manufacturing and warehousing. Today the land at Bowerhill and Berryfield is largely covered in houses and the large industrial and commercial estates separated from Melksham town only by the A350 and A365. These housing developments and those in Blackmore to the East of Melksham area have been built on green field sites, immediately adjoining the Town Council boundary.
15. There is high level of mutual dependency with local both town and parish residents of all ages equally using Melksham’s many facilities and services, and enjoying the local events and Festivals wherever they are located within the town or parish.
16. When asked where they come from, most parish and town residents are proud enough of their local community to respond first by saying ‘Melksham’, only sometimes then expanding to include ‘Bowerhill’. However, few local residents - especially recent ‘incomers’ - realise that the Parish Council makes little or no financial contribution towards their costs of such facilities and services.
17. Melksham faces many challenges over the coming decades if it is to contribute effectively to meeting future national and Wiltshire targets for new housing; whilst identifying the community, employment, health and infrastructure needs to support the rapidly growing local population.

REASONS FOR ONE INTEGRATED MELKSHAM COUNCIL

Population Growth

18. The Melksham area has experienced very significant population growth over the past few years. A lack of five-year land supply and Wiltshire’s consequential inability to resist large scale planning applications has resulted in a significant increase in the number of developments for large numbers new houses currently approved by Wiltshire Council or under construction in the Melksham area.
19. Estimated forecasts population growth for the Melksham Community Area over the period from 2001 to 2026 was forecast to rise from 24,100 to 29,810 (19%) with a projected forecast for 2011 of 26,590.⁵
20. However, the 2011 census showed that the population of the Melksham Community Area as being 28,343 ⁶, and more recent mid 2018 ONS data indicates this has risen again to 30,867. ⁷

21. Information included in the recent 2020 – 2036 Melksham Town Review:
 - a) indicates that the population is split between Town (16,678), Parish (7,374) with the other rural Parishes (6,885).⁸
 - b) in the mid 2018 order of the largest Wiltshire populations by civil parish, Melksham Town is 7th and Melksham Without Parish is 17th - but the combined total of one integrated Melksham Council (24,052) ranks 4th (after Salisbury, Trowbridge and Chippenham).⁹
22. Public domain data reported by the Wiltshire and Swindon Information Network (WSIN) reports that the 'Mid-2018 Lower-layer Super Output Area Population estimates' file produced by the Office for National Statistics (ONS) indicates the population of Melksham community area has now grown to 30,867 ⁷.
23. Respective town and parish websites claim 23,000 and 7,500 residents ¹⁰ - a total for the Melksham Community of 30,500, which is broadly in line with the ONS figures.
24. So during the intervening period from 2011 to 2018 census, the population of the Melksham Community Area has grown significantly to a point that it already exceeds the Wiltshire Council's previously projected population for the year 2026.
25. This data is also broadly supported by figures produced by the recent review of Wiltshire Electoral Divisions produced by the Local Government Boundary Commission,¹¹ which has allocated the registered voters to each Melksham Division according to the Table below.

URBAN (Melksham Town)		RURAL (Melksham Without)	
Melksham East	4183	Melksham Without North & Shurnhold	3,907
Melksham Forest	4196	Melksham Without South & Rural	3,845
Melksham South	4,128		
TOWN	12,507	RURAL	7752

These figures do not take account of under-age or non-registered adult residents in the Melksham area.

This allocation reflects Wiltshire's need to 'balance its county wide electoral Division' rather than representing voter needs of the Melksham Community.

The Future Housing Market

26. Tables in Wiltshire Council's Chippenham Housing Market Report (2017) confirms that the target for 2,370 new homes needing to be built in the Melksham Area has already been achieved – and will exceed the target for future development to 2026 – so the revised target is zero new units.
27. Even though Melksham's 2026 housing target has already been exceeded, more new housing developments are currently under development / occupied or are in the pipeline having been approved by Wiltshire Council for the area.
28. More new housing is currently under development, being occupied or in the pipeline within the boundaries of the proposed single Melksham Council area. Melksham area. Large scale developments are taking place East of Melksham Extension (450), Sandridge Place (100), Bowood View off the Semington Road (150), Pathfinder Way, Bowerhill (235) – a total 935 new homes with another 70 units is various smaller projects in the town area.
29. These developments all adjoin existing housing in Melksham and further contribute to the urbanisation of the entire local community.

30. Wiltshire Council's future plans to meet the government's targets for new housing by the year 2036 is to transfer Melksham into the Chippenham Housing Market Area, which has a revised target of around 23,000 new houses by 2036. Inevitably this means over 2,500 more houses for Melksham. ¹²

Addressing Resident Concerns

31. There is growing public concern that community infrastructure investment is not keeping pace with new house building within the Melksham area. Residents currently see no apparent commitment between the two Councils to adopt common policies that require developers to provide the essential community, education, employment, health and infrastructure facilities / services to serve Melksham's rapidly rising population as a whole. This is becoming a matter of discussion in the letter pages of local media.
32. Integration of Polling Districts into one integrated Melksham Council need not change the character of established local communities nor the expectations of residents.
33. This is becoming a matter of discussion in the local media. Recent suggestions in the local press that creation of one integrated Melksham Council might double the precept for parish residents might be politically motivated mischief to 'maintain the myth' of 'village status', but the discussion reflects the fact that many local people are now questioning if the present split civic governance of two Councils representing Melksham residents is any longer 'fit-for-purpose'.
34. Also being discussed is the allocation of precept and Community Infrastructure Levy (CIL) funding, which is supposed to be allocated to provide the community infrastructure, retail and transport facilities needs of local communities. However the rapidly growing population of the Melksham community as a whole has not benefitted since relevant regulations came into force in April 2010.
35. Some examples of poor decision making arising from the lack of a consistent civic governance approach are:
- a) the plan to locate a primary school within the site of the Pathfinder Way development, to served pupils from this estate and the 450 new East of Melksham homes, which necessitates parents and their children having to cross the busy A365 Western Way unprotected at peak times when traffic is accessing the Bowerhill houses and industrial estates;
 - b) the allocation of the one million pounds offered by developers towards providing more secondary education places to the Oaks Community School without any engagement or consultation with local parents and residents;
 - c) the planners recommendation to refuse a request from the NHS for £150,000 - and accepted by developers - as a funding contribution towards meeting the cost of hard-pressed GP health resources struggling to meet the needs of the more patients than predicted for 2026 arising from new housing development - rejected in the planning process as no immediate use of the funds was identified in the parish area.
36. Many residents are simply not aware that the split governance arrangement even exists – and certainly what the impact might be in terms of providing facilities and services. They assume that there is only one Council with this responsibility - and they expect equitable sharing of the costs of providing the facilities and services that both town and parish residents rely on. Melksham needs better understanding and commitment to provide the facilities and services needed by the local community across the age range.
37. One Council would be better placed to liaise and collaborate in partnership with Wiltshire Council and other statutory / voluntary sector partners to plan, fund and provide the essential facilities and services to keep pace with Melksham's rapidly growing residential expansion.
38. These partners should benefit from reducing their administration costs and the pressure on their staff, resources and time needed to deal with just one Council; who in turn should also be able to more efficiently manage decision-making and an expanded staff team for the benefit of all Melksham residents.

BENEFITS OF ONE INTEGRATED MELKSHAM COUNCIL

39. Overtime, the integration of the Polling Districts identified in the foregoing paragraphs 6 and 8 to create one single Melksham Council would be better placed to deliver benefits for local third tier community governance, for local residents, and also to Wiltshire Council.
40. One Council would be better placed to liaise and collaborate in partnership with Wiltshire Council and other statutory / voluntary sector partners to plan, fund and provide the essential facilities and services to keep pace with Melksham's rapidly growing residential expansion.

Local Governance

41. The benefits for local community governance of an integrated single Melksham Council are likely to be opportunities:
 - a) to promote Melksham as one integrated Council serving a population of 24,052, which would rank as the 4th largest population in Wiltshire;
 - b) for the local community to deliver a more cohesive message when demanding the facilities and services needed to support its very rapidly increasing population and to use its resources to significantly enhance the local urban community as a whole;
 - c) a much stronger voice when decisions are being made about how and where Melksham develops for the future – building on its position as the 4th largest urban population in Wiltshire;
 - d) to create a credible and viable longer-term Melksham Neighbourhood Plan to 2036;
 - e) set future precepts to fund the facilities and services needed to support and benefit all Melksham residents;
 - f) to efficient use of the expanded resources and staff in Council planning and implementation of policies to achieve economies of scale and deliver essential facilities and services;
 - g) to strengthen the democratic balance of elected representation for the Melksham community by widening the geographic eligibility area to attract applications from residents, including existing town and parish Councillors, to offer themselves for election.

Local Residents

42. The benefits of one integrated Melksham Council for local residents are likely to be opportunities:
 - a) to demand the facilities and services that are needed to support a very rapidly increasing population and the resources to significantly enhance our local town.
 - b) to use the single Council status to address resident concerns about lack of investment to provide the essential community, education, employment, health and infrastructure facilities / services to serve Melksham's rapidly rising population as a whole;
 - c) to offer a much stronger voice a single source when decisions are being made about how and where Melksham develops for the future;
 - d) to reduce the cost of supporting two Councils by making more efficient use of the expanded resources and Melksham staff team available to enhance the whole Melksham community;
 - e) to strengthen Council planning and implementation of policies to achieve economies of scale and deliver essential facilities and services more efficiently;
 - f) to equitably share CIL, grant and other sources of funding and the setting of fairer future precepts to provide the facilities and services needed to support and benefit all Melksham residents;

- g) to help create an even stronger progressive community spirit in Melksham for the benefit of young and older residents of all ages.

Wiltshire Council

43. Wiltshire Council is also likely to benefit from into one single Melksham Council by:
- a) reducing Wiltshire Council's administration costs and officer time needed to:
 - liaise and carry out partnership working with one council rather than two;
 - carry out more efficient engagement to obtain community feedback;
 - avoid and resolve conflicting consultation feedback on development and implementation of Wiltshire Council plans, policies, and strategies;
 - create a viable organisation to enable the transfer or upkeep of assets that Wiltshire Council can no longer afford to maintain;
 - administer the collection and distribution of future precepts for one Council rather than two in the Melksham area;
 - comply with legislative requirements in dealing with planning applications.
 - b) creating enhanced opportunities for more efficient and effective partnership working to plan and deliver Wiltshire Council's Core Strategy policies, plans, facilities and services in the Melksham area;
 - c) scope to integrate Polling Districts across the Melksham area to better relate to availability of Polling stations;
 - d) a much stronger voice when decisions are being made. In short, we need more say about how and where Melksham develops for the future;
 - e) efficient use of the expanded resources and staff in Council planning and implementation of policies to achieve economies of scale and deliver essential facilities and services;
 - f) ensuring that a democratically viable third tier Council exists in Melksham with strengthened elected representation to articulate and help create an even stronger progressive community spirit for the benefit of local residents of all ages.

PROMOTING ECONOMIC AND STRATEGIC DEVELOPMENT

44. Even though the combined Melksham population ranks the area as 4th largest within Wiltshire, there is no apparently consistent economic and strategic planning to provide essential employment facilities nor to alleviate local traffic congestion.
45. Wiltshire Council's current Core Strategy seems to view Melksham's role as being a largely domiciliary area, with a significant proportion of local residents seeking employment via outward commuting to Bath, Bristol, Swindon and farther afield – including along the M4 to London. This is evidenced by the higher than planned traffic congestion on Melksham roads at peak period and the surge in use of local rail services through Melksham Railway Station.
46. However, this no longer accords with the amount of manufacturing and other commercial accommodation in the town nor changes in the work-life balance expectations of modern society.
47. Melksham has succeeded over recent years, in attracting a number of major new employers to the area - Avon, Knorr Bremse, Gompels, GPlan, Herman Miller, Travelodge, and Wiltshire Air Ambulance - offering a range of jobs and broadening the range of skills required locally.

Employment

48. Wiltshire Council records that “ the proportion of employment in the manufacturing sector is the highest in Wiltshire (well above average both locally and nationally) and employment in the retail sector is also above average¹³.
49. Comparative analysis of the commercial premises in Melksham indicates space, position and number of premises against other urban areas in Wiltshire show: ¹⁴

	Sq Mtrs	Postition	Premises
WILTSHIRE	1,520,000	-	2,779
industrial	203,000	1st	187
office	14,000	7th	124
warehouse / distribution	193,000	2nd	103

50. Wiltshire Council’s Core Strategy identifies that currently land is allocated for employment use in the Melksham area is primarily located in the Bowerhill and the Hampton Park trading estates in the parish adjacent to the A350 Semington Bypass; and at the Cooper Tires and Avonside Park sites in the town area north of the River Avon.
51. These sites provide employment for local people in a range of distribution, manufacturing and warehousing businesses. Other, largely low skill part time or zero contract, jobs are provided in the supermarkets, town centre shops and other local community retail premises; and at a range of local pubs and restaurants.
52. An integrated strategic approach will be needed to take advantage of future economic and employment creation opportunities. These could be created by the release of a substantial acreage of brownfield sites in both the town and parish – for example, arising from the recent decision by Cooper Tires to relocate most of its manufacturing activities overseas and Wiltshire Council’s closure of the Christie Millar Sports Centre site.
53. Attracting a wider range of artisan, local and national retail outlets and improved car parking facilities as part of a long-overdue town centre regeneration project is needed to enhance the shopping experience of Melksham and other local residents.
54. This can best achieved by a single integrated Council promoting the town’s combined population as the fourth largest town in Wiltshire. A single Melksham Council would be well placed to adopt a strategic vision of how the redevelopment of these projects as employment land sites can be achieved. This would broaden the experience, expertise and skills mix needed to support the local economy; and encourage schemes of apprenticeship, training and up-skilling within the local workforce. As a start to progress this approach, the Town Council is employing an Economic Development Officer to promote the benefits of locating businesses in Melksham.
55. The limited retail provision serving the Berryfield, Bowerhill and East of Melksham communities is consistent with the small district community developments now found in other local urban conurbations such as Chippenham and Trowbridge.
56. A single Melksham Council would also be well placed to ensure that the area benefits from its central location along the A350 north-south corridor linking to the M4 motorway and Poole; from future enhancement of the local highway network; and from the greatly improved rail links with the enhancement of its own station but also easy access to the national network via Chippenham, Trowbridge and Westbury.

Strategic Projects

57. One integrated Council is needed to provide a cohesive economic development strategy for the entire Melksham community. A strong voice is needed to promote several other local strategic projects that need to be explored to boost the local economy and create new employment opportunities in Melksham to take advantage of the town's central location along the A350; especially for large scale strategic and canal / highway projects
58. There is, as yet, no strategic vision for investing in the development of sustainable future economic and employment opportunities for the Melksham area agreed by the town and parish. The Town Council is developing proposals for regenerating the town centre, and some progress is belatedly being made via the long delayed evolving Neighbourhood Plan.
59. Wiltshire Council has previously identified land adjoining the Bowerhill trading estate as SHLAA sites with development potential for housing, but which might be better suited for employment purposes. Also some smaller brownfield sites exist in the town. An integrated approach is better placed to develop a plan for their development, regardless of location within an integrated Melksham Council boundary.
60. A strategic vision for the regeneration of Melksham's Town Centre, coupled with a cohesive plan for the redevelopment of any spare acreage at the Cooper Tires and Avonside Park sites, has the potential to create a significant number of new jobs for Melksham residents.
61. In July 2017 Wiltshire Clinical Commissioning Group identified a requirement to update the primary care facilities and services for the 120,000+ patient population of Bradford – Chippenham – Melksham and Trowbridge communities.¹⁵ Amongst other things, this included provision of a 'hospital hub'.¹⁵ The proposal created an opportunity, then supported by the landowner, to take advantage of Melksham's central location for creating a new build facility immediately adjacent the A350 Semington Bypass and next to the Wiltshire Air Ambulance Base. This has not progressed as yet due to changes within the NHS Estates organisation, which have recently been implemented, but may still be an option for consideration, especially as the Damian GP surgeries is seeking to close in March. Investment in health related facilities will create many multi-skills jobs and be very beneficial in sustaining the economy of the Melksham area.
62. Wiltshire's Core Policy includes the safeguarding of land running through both the parish and town to restore the Wiltshire and Berkshire Canal.¹⁶ The development to restore a link from the Kennet and Avon Canal to the town centre will initially create construction jobs and deliver some new housing. Once completed the proposal has major implications for both parish and town areas, as it potentially offers the prospect of providing additional community facilities, boosting the local tourism economy, and delivering environmental and recreational benefits.
63. Following a highways review that identified an much higher level than expected of traffic movements along the A350, Wiltshire Council has recently completed a transitional improvement of the Farmers Roundabout to reduce congestion. Longer-term Wiltshire Council has identified, with support from both town and parish, several options to meet the need for a by-pass round the east of Melksham.¹⁷
64. Although both Berryfield and Bowerhill have village Halls, the Berryfield one is no longer fit for purpose and needs to be replaced. This is reliant on developer contributions arising the new housing development along the former Semington Road.
65. Many jobs will be created during the construction phase of all the above projects, followed thereafter by a range of skilled / unskilled and full / part local employment opportunities – all of which will contribute towards the long-term economic prosperity of the whole Melksham community and of the wider Wiltshire.

Community Infrastructure Levy (CIL)

66. The intention of the CIL legislation introduced in the 2008 Planning Act was to use a one-off payment made by property owners / developers to help fund the cost of providing the local infrastructure needed by communities to support increased population arising new housing

developments. However the community of Melksham as a whole has not benefitted since the relevant Community Infrastructure Levy Regulations came into force on 6th April 2010.¹⁷

67. The resources of a single integrated Council working with Wiltshire Council and local partners can more efficiently enhance the wellbeing of all Melksham residents by using Community Infrastructure Levy (CIL) and other funding to deliver enhancement of such projects as the King George V Park, the Assembly Hall, the Library, and sports facilities at the Melksham House Campus, and the ongoing maintenance of allotments, green spaces, play areas local footpaths / cycle-ways.
68. A more efficient allocation of CIL funding is required to provide the community, infrastructure, retail and transport facilities needs of the rapidly growing population of Melksham. Under current arrangements, the parish benefits from the CIL funding because that is where most of the new housing is located. Unfortunately, many of the hard pressed facilities and services that residents rely on are located in the town. A single integrated Melksham Council would resolve this problem.
69. Wiltshire Council reported that in the 2016 Boundary Review the Parish Council has already recognised that where houses in new developments sit better with the town they should be transferred.² Around 750 houses have already been transferred and the Parish Council is now proposing to transfer a further 550 houses from East of Melksham and Sandridge Place developments. This suggests that the parish recognises these new housing developments are eroding the green buffer zones with the town and are contributing to the urban expansion of the whole of the existing Melksham communities.
70. The proposal to transfer this new housing should therefore carry with it the CIL funding in order to enable infrastructure developments that will benefit all local Melksham residents. This has not been the case to date. Instead the hard pressed local community, education and health facilities and congested highway network are expected to cope with existing arrangements without any investment for the future to cope with the increasing local population.
71. The work to achieve these transfers is an unnecessary administrative burden on Wiltshire Council and other relevant bodies, which could be avoided by transferring Berryfield, Blackmore and Bowerhill areas to create single integrated Melksham Council; and establishing a separate Parish for Beanacre, Shaw and Whitley.
72. One integrated Council for Melksham representing all local residents would be better placed to enable a strong local voice to be established for the community in its relationship with Wiltshire Council, other public bodies and local landowners / developers to ensure that CIL funding is used more effectively to identify and implement a planned strategic vision of what facilities and infrastructure to support a rapidly growing local population.

Education and Training

73. Historically, secondary education in Melksham was broadly focused on meeting the engineering, scientific and technical skill requirements of the town's main employer - Avon / Cooper Tires. Secondary education for most young people of Melksham is now provided in one secondary school (Melksham Oaks Community School), which relocated to a green field site on the town / parish boundary along the A365 Devizes Road.
74. Developers of the new East of Melksham houses have offered one million pounds towards providing secondary education places. This has been allocated to address growing demand pressure on places at Oaks Community School, which is already reaching capacity. The school is seeking to expand by constructing new or temporary classrooms – but the school 'has limited further development potential'.
75. This funding has been allocated without any engagement or consultation with parents and local people. There is a view amongst some parents and residents that a second secondary school will be needed in Melksham to provide some choice and address the demand for places for the growing population. There is also some concern as this new housing development will drag more children

along or crossing already congested roads. There is evidence that some secondary age children are already accessing school places in Corsham, Chippenham and Trowbridge.

76. Similar capacity issues exist for the primary schools serving Melksham Children. This is partially being addressed by the plan to locate a new primary school within the site of the Pathfinder Way housing development. This will draw pupils from this development and the 450 new East of Melksham homes but necessitate parents and their children to travel by car or risk crossing the busy A365 Western Way at peak times for traffic access the Bowerhill houses and industrial estates.
77. The assignment of the Canberra Youth Centre to Young Melksham to provide youth services to local young people is very welcome, but was achieved largely through the efforts of a voluntary community group with grant aid support from Wiltshire, the town and parish. A stronger integrated local voice might have achieved this outcome much quicker.
78. Further education is accessed at Wiltshire College campuses in Chippenham, Lackham and Trowbridge. It is likely that wider education and training skills will need to be available to Melksham residents as the range of local employment opportunities expands and the community and their personal aspirations evolve.
79. Land use development must go hand-in-hand with skills development if Melksham is to fully contribute to the future economic prosperity of the area and Wiltshire as a whole. There is currently a lack of a jointly evolved strategic vision for educating, support, training and skills development for the people of the town and parish which can only really be overcome by creating one integrated Melksham Council with the resources and skills available to identify and underpin residents' needs in future collaborative working with Wiltshire Council and other agencies.

Highways and Transport

80. It is reported that Wiltshire Highways Department's most recent analysis of traffic flows around Melksham confirms 30,000 – 40,000 movements per day, which is far more traffic using the A350 than it's previously planned capacity. Traffic congestion is encountered on a regular basis along Western Way, around the Farmers Market roundabout and on other roads into Melksham. This shows that the local road network cannot cope with this volume of traffic and fully justifies the recent upgrade work undertaken as a temporary fix.
81. However, the A350 is becoming an increasingly important north-south route. An Eastern by-pass around Melksham is one of several schemes that have been proposed to the Department of Transport by the Western Gateway Sub-National Transport Body for potential future funding. The recently approved government funding for a bypass around Chippenham is questionable given the investment in upgrading the A350 to the west of the town. However either routes could then be extended to take most of the heavy vehicles and tourist traffic around Melksham – away from most of the residential areas. A long-term by-pass solution for Melksham is long overdue.
82. Both the recently opened eastern distributor road – built largely from housing developer contributions – and the Semington by-pass have both been designed to allow for eventual dual carriageways to allow for the extra traffic likely to be using local roads and the A350 in the future. Both the Parish and Town Councils support the development of an Eastern by-pass in principle – but an integrated Council may be better placed to work with Wiltshire Council, the Highways Agency and other partners to progress this.
83. There are still details that need to be considered, consulted upon, and finalised. It is vital that a strong Melksham voice is heard to achieve the significant community, education, health and infrastructure investment comes with - or preferably before – any new large scale new housing developments. This can best be achieved by a single integrated Council for Melksham working with partners to insist on robust conditions imposed on developers to invest in these infrastructure requirements.
84. The huge increase in rail traffic ¹⁸ using Melksham Station for employment, education or leisure purposes is testament to the move towards using public transport services by local people.

THE TWO COMMUNITIES ARE MUTUALLY DEPENDENT

85. Geographically, the Parish almost surrounds the Town boundary. Although much of the new housing is located at the fringes of the town, there is a high level of mutual dependence in the use that residents from both Council areas make of local facilities, services and infrastructure, wherever they may be located within the town or parish boundaries.
86. Town and Parish residents already share the use of Melksham's existing public and voluntary facilities / services that provide community, education, employment, entertainment, health, highway, leisure, play areas and open spaces, retail, social and transport.
87. Entertainment, community, social and recreation facilities for residents are provided within the town boundary at the Assembly Hall, in the King George V Park, the library, at the hospital and the three GP surgeries, in the Market Square, and in the future at the Campus. Recreational and sporting facilities - and most of the employment - currently exist within the parish but this will change when Melksham House Campus opens. Every year thousands of Melksham residents and people from much farther afield flock to the town to enjoy the Carnival, Christmas Lights, Food and River Festival, Party in the Park and the many shows and community activities hosted in the Assembly Hall.
88. The town centre area is the focal point for the main supermarkets, both national and local 'high street' business and retail services, and various market activities.
89. Demand pressure in Melksham for both primary and secondary school places is likely to intensify with future new housing developments; as will patient needs for local primary health and social care facilities services placed on the already overworked local GP surgeries – one of which (St Damians) is seeking to close, forcing patients to reregister with the other two or going to Bradford.
90. Residents from both town and parish make good use of local public transport services. Community public transport links around the Melksham area link passengers at the 'hub' in the Market Square to bus services to Bath, Chippenham, Corsham, Devizes, Frome and Trowbridge; and to the adjacent taxi rank.
91. The increase in number of trains calling Melksham railway station and the consequential upgrading of the platform has led to a surge in passenger numbers –raising Melksham to the highest percentage increase in passenger use in Britain ^{A12} - and greatly improving rail access via Chippenham, Salisbury, Swindon, and Westbury to the national network.
92. The many voluntary and community groups operating in the Melksham area provide facilities and services to local residents without making any distinction about which part of the wider local community they come from. Both the Town and Parish Councils provide grants – often together - to support these activities and the public events described.
93. Since 2014, the Town and Parish Councils have been working together to support the production of a long-delayed evolving Neighbourhood Plan to address local land use and planning issues within their respective boundaries. One of the reasons underpinning this joint approach was to produce a Plan to promote community cohesion, logical infrastructure and a united vision for when a boundary review takes place. Five years down the line, no Plan has yet been forthcoming and the process has not yet reached Regulation 14 stage in the adoption process, which - together with the lack of five-year land supply and consequential inability to resist large scale planning applications - has allowed developers to turn many green fields in and around Melksham into housing estates.
94. More recently, both Councils have agreed to collaborate on creating a mini country park in the Shurnhold Field. Both these projects take a joint strategic overview of the use of land, which falls within the control of both Councils, but much of the maintenance is now being undertaken by local volunteers with support.

95. However, there is growing public concern that provision of the facilities, infrastructure and services needed to support our rapidly increasing 30,000 plus population in Melksham are not keeping pace with plans for future new housing developments. A single integrated Council for Melksham would be well placed to reflect these concerns with local partners and to be an agent to spur delivery of plans to ensure that local people get the support that the community needs.

REVIEWING THE 'VILLAGE STATUS' ARGUMENT

96. Dictionaries define a 'parish' as being a "unit of local government in rural England ¹⁹, often coinciding with an original ecclesiastical parish" ²⁰. Neither Bowerhill, Berryfield nor the land East of Melksham have their own church - they are all part of the parishes of St Michaels Melksham – within the Town boundary - so do not meet the test of coinciding with an original ecclesiastical parish.
97. Historically, the market town of Melksham was surrounded by land devoted to farming. The land at Bowerhill was largely agricultural until 1940 when the Royal Air Force took it over to create the No. 12 Technical Training School and build married quarters housing in the Berryfield area. When these were closed during the mid 1960's, the land did not revert to farming but was used instead to build housing and industrial estate premises for distribution, manufacturing and warehousing.
98. Today the land at Bowerhill and Berryfield is largely covered in houses and the large industrial and commercial estates separated from Melksham town only by the A350 and A365, so becoming urban conurbations.
99. These housing developments and those in the East of Melksham area have been built on green field sites, immediately adjoining the Town Council boundary. For years Wiltshire Council planners have considered that Bowerhill is part of Melksham for planning purposes.
100. More recent planning decisions have allowed housing development of over 250 new houses on the land off Pathfinder Way, 150 along the Semington Road and a further 450 house off the Spa to extend along the south east of Melksham.
101. These developments further eradicate the rural buffer gap between the town and parish. The failure to protect the green space rural buffer between Melksham town and the Bowerhill and Berryfield communities effectively neutralises the aspirations of some of local residents to maintain the illusion of 'village' status.
102. Within the parish figures, the population of Bowerhill is reported as being 3000 electors, and of Berryfield being around 1,000 people ²¹. This is supported by the numbers of electors registered in the Bowerhill Polling Districts.
103. On paper, this number of electors should be sufficient to sustain a case for an application for a separate Parish Council. This option has been explored but discarded - largely because of
- a) the lack of historical recognition of 'village status' for Bowerhill;
 - b) the identity of Bowerhill as a village is subsumed within the Melksham Without Parish, and is not considered separately in dealings with Wiltshire Council and other statutory bodies;
 - c) the high level of mutual inter-dependency for community, employment, entertainment, facilities, services and road networks between the Bowerhill and Melksham communities;
 - d) new housing development has closure of the green buffer area between the communities;
 - e) the unusually high level a industrial, office and warehousing premises located in trading estates more usually found in urban areas;
 - f) recent experience suggests that the parish has struggled to attract enough candidates offering themselves for election to serve as Councillors.

- g) Integration of the Town and Parish Councils into a single Melksham Council creates a much stronger voice for local residents in dealings with Wiltshire Council and other statutory and voluntary bodies;
 - h) and provides an opportunity to establish a cohesive economic development strategy covering housing, employment, recreation, retail, skill development and transport.
104. The fact is that over the past seven decades Berryfield, Bowerhill and most recently East of Melksham have increasingly become large urban housing estate communities as green fields have been developed.
105. Melksham needs to build on the pride, community spirit and volunteer commitment that delivers the successful Carnival, Christmas Lights, Food and River Festival, Melksham in Bloom, Parkrun, and Party in the Park – all events that the parish makes little or no funding contribution towards.
106. Conclusion – the argument that Bowerhill and Berryfield should be called historic rural villages within a Parish Council area can no longer be sustained because these communities:
- (a) do not meet the test of a link to an original ecclesiastical parish;
 - (b) much of the land in these communities and east of Melksham are now largely covered by housing or industrial premises;
 - (c) recent Wiltshire Council planning approvals for new housing have largely eradicated the rural buffer with the town;
 - (d) the high level of mutual dependency for residents accessing the range of Melksham facilities and services.

For all the reasons outlined in the foregoing paragraphs, it is suggested that the Polling Districts listed in paragraphs 6 and 8 of this document, formerly being in the Melksham Town and Melksham Without Parish Council boundaries, are integrated to form a new Parish to be called Melksham Council.

CREATING A NEW PARISH COUNCIL FOR BEANACRE, SHAW AND WHITLEY

107. The Collins English Dictionary defines a ‘parish’ as being a “unit of local government in rural England, often coinciding with an original ecclesiastical parish”.²⁰ Both Beanacre and Shaw have parish churches - so meet the ecclesiastical parish definition test.
108. The three adjoining Beanacre, Shaw and Whitley communities have connecting boundaries; and are located in rural settings located to the north west of Melksham. Shaw and Whitley are recognised as being historical villages and ancient centres of population.
109. There has been little significantly large-scale new housing development and population growth within their boundaries of any these villages to breach the rural buffer between them and Melksham town.
110. The Parish Council already recognises the combination of Beanacre, Shaw and Whitley as a separate Ward for election and representational purposes.
111. Using Wiltshire Council’s Polling District data, the estimated number of voters in each Polling Districts listed in the following table indicates how a Beanacre, Shaw and Whitley Parish Council would compare with other immediately adjoining Parishes.

Proposed New Parish 1 - Beanacre Shaw and Whitley

Parish	Polling District	Estimated Voters		Cllrs
		2018	2024	
Atworth	EC1	945	981	9
Shaw and Whitley Beanacre	FX1, FX2	1094 279	1141 290	9 or 11 suggested
Broughton Gifford	EL1	667	692	11
Keevil	FH1	371	385	7
Lacock (Corsham Without)	OH1	828	1640	11
Seend	YB1	901	935	11
Semington	GF1		839	9

112. This data tends to support the Melksham Without Website report that the total population of the respective communities as Beanacre (300), Shaw (500) and Whitley (1,000) – a total of c1,800^{xx}, and other adjoining local parish websites report their populations as being Atworth (1,275), Broughton Gifford (813), Keevil (437), Seend (1095) and Semington (969).
113. All of these adjoining parishes are viable and operate successful Parish governance arrangements^{xy}. A strong case exists for these three outlying rural Parishes to be given greater self autonomy to build closer links on geographical grounds. So it is therefore argued that, taken together, Beanacre, Shaw and Whitley are also big enough to sustain their own Parish Council.



114. There is a vibrant action group of volunteers (Community Action Whitley and Shaw (CAWS), of which all residents of the two villages are automatically residents, who might provide a basis for creating a viable governance arrangement.
115. Melksham Town Council has indicated their support for this proposal.

For the reasons outlined in the foregoing paragraphs, it is suggested that the Polling Districts listed in paragraphs 104 to 112 of this document, formerly being in the Melksham Without Parish Council boundary, are integrated to create a new Beanacre, Shaw and Whitley Parish

TRANSFERRING THE 'BRAG' PICNIC AREA LAND FROM SEEND PARISH TO MELKSHAM COUNCIL

116. In their response to this civic governance consultation, Melksham Without Parish Council is reported to have requested the transfer of the BRAG 'canal picnic area' land from Seend Parish Council. The proposal is worthy of serious consideration and support.²
117. The land suggested to be transferred is situated on the Melksham side of the Kennet and Avon Canal, immediately adjoining the Bowerhill housing estate.
118. The site is maintained by BRAG – a group of volunteers forming the Bowerhill Residents Action Group, who maintain the site and carry out a range of other community projects.
119. The site provides an important recreational amenity, which is widely used by Melksham residents from town and parish. Most of the public access to this land is generated from the Bowerhill side of the canal.
120. The Local Government Boundary Commission is recommending that Seend is transferred out of the Melksham Community Area.
121. The Parish Council's proposal to include the 'BRAG' site with the rest of the Bowerhill estate is therefore entirely logical.

For the reasons outlined in the foregoing paragraphs, it is suggested the proposal that land known as the BRAG 'canal picnic area' formerly being in the Seend Parish Council boundary is transferred into the proposed new Melksham Council area.

ORIGINAL SUBMISSION TO COMMUNITY GOVERNANCE REVIEW

Please submit my comments to the community governance review consultation in respect of the Melksham, Town, Melksham Without and Seend area. I suggest for your consideration:

1. Merging the Bowerhill, Berryfield and East of Melksham areas into the current Melksham Town boundaries to create a single integrated Melksham Council with five Wards;
2. Creating a new separate Parish including the historic villages of Beanacre, Shaw and Whitley;
3. Transferring all the 'BRAG' land from Seend Parish into the proposed new Melksham Council area

Melksham Town Council and Melksham Parish Council have been working together for several years to support the production of an evolving Neighbourhood Plan. During this period, the Melksham Community Area has experienced very significant population growth to 30867¹, which in 2019 already exceeds Wiltshire's core policy 2026 target Population Estimates and Forecast of population for the area of 29810²

Historically, land east and south of Melksham was devoted to farming, until Bowerhill became RAF Melksham before becoming housing and industrial estates and Berryfield became married quarter housing. More recently, green fields east of Melksham have been developed to meet housing needs.

Even though Melksham's 2026 housing target has already been exceeded, more new housing developments are currently under development / occupied or are in the pipeline having been approved by Wiltshire Council for the area. Evolving housing developments on the Pathfinder Way and along the Semington Road and the commercial and industrial premises on the large Bowerhill and Hampton trading estates have effectively closed the rural buffer between the Town and Parish Council areas.

Melksham Parish Council has already transferred around 750 houses to the Town Council, and now suggests transferring several hundred houses more of these new houses to the Town Council. In reality, Bowerhill, Berryfield and East of Melksham are not villages - they are large urban housing estates.

Town and Parish residents share the use of Melksham's existing public facilities and services – but there is growing public concern that provision of community, education, employment, entertainment, health, highway, leisure, play areas and open spaces, retail, social and transport infrastructures are not keeping pace with these housing developments. I share the views of many local people who question if the present civic governance arrangement of two Councils representing Melksham residents is any longer 'fit-for-purpose'.

Melksham faces many challenges over the coming decades if it is to contribute effectively to meeting future national and Wiltshire targets. A very strong business case can be made to show how a single integrated Melksham Council would be better placed to (a) understand and reflect the needs of local people of all ages, and (b) to deliver economies of scale and enable efficient, constructive contribution towards future collaborative working with Wiltshire Council and other statutory bodies in the planning and delivery of infrastructure facilities and services to meet the demands of a rapidly growing population. I therefore suggest Proposal 1 above for consideration.

Conversely Beanacre, Shaw and Whitley are recognised as being historical villages and ancient centres of population areas, with connecting boundaries in rural settings located to the north of Melksham. There is a vibrant action group of volunteers (Community Action Whitley and Shaw (CAWS), of which all residents of the two villages are automatically members, who might provide a basis for creating a viable governance arrangement. There are already many smaller parish Councils with smaller populations within the Wiltshire County boundary that are viable. I therefore suggest Proposal 2 above for consideration.

The 'BRAG' land is situated on the Melksham side of the Kennet and Avon Canal area, maintained by the Bowerhill Residents Action Group, and with general public access from the Bowerhill area. Seend is being transferred out of the Melksham Community Area so it seems logical to include the 'BRAG' site when the rest of the Bowerhill estate is merged to create a new integrated Melksham Council. I therefore suggest Proposal 3 above for consideration.

Thank you.

Nick Westbrook 29 Sandridge Road, MELKSHAM SN12 7BQ

29th November 2019

SOURCES

- 1 Wiltshire Core Strategy – TABLE 5.9 Delivery of Housing 2006 – 2026 - Melksham
- 2 Melksham Without Parish Council Full Council Minute 101 / 19 – 24th June 2019
- 3 Chippenham Housing Market Area – Individual Settlement and Housing Market Profile – 2017
- 4 Electoral Forecast Data – August 2018
- 5 Population Estimates and Forecast – Table 2.0A Wiltshire Intelligence Network
- 6 Melksham 2011 Census Data - Wiltshire Council
- 7 2018 Community Area Population, Smaller Area Populations Chart – WSIN
- 8 Melksham Town Review 2020 – 2036 Demography Table – page 35
- 9 JSA for Melksham Community Area Executive Summary - page 6
- 10 Respective Melksham Town and Without Parish Council websites at 12.2019
- 11 Wiltshire Final Recommendations – Local Government Boundary Commission
- 12 Chippenham Housing Market Area 2017 (page 34) - Wiltshire Council
- 13 JSA for Melksham Community Area Executive Summary (page 14)
- 14 Melksham Town Review 2020 – 2036 Demography Table – page 6
- 15 Wiltshire Clinical Commissioning Group - July 2017
- 16 Wiltshire Core Strategy
- 17 Community Infrastructure Levy Regulations - 6th April 2010.
- 18 Trans Wilts data
- 19 Penguin English Dictionary (page 642) - Penguin
- 20 English Dictionary and Rogets' Thesaurus (page 623) - W H Smith
- 21 Melksham Without Parish Council website at 12.2019

Comments on Recommendation 9 - Creation of a new parish of Derry Hill & Studley

Firstly I would like thank the Electoral Review Committee for their time and efforts in considering the petition and other requests.

As the originator of the petition I am naturally disappointed that the recommendation is not to create a new parish council of Derry Hill and Studley in time for the May 2021 election. I am heartened though that there is now at least an acknowledgement that there is compelling evidence that a new parish of Derry Hill & Studley could be created if satisfactory arrangements can be made for the remaining part of the parish, I strongly believe that the remainder of Calne Without is perfectly capable of continuing to be a viable parish council from the May 2021 election.

I can appreciate the Committee's desire to explore other possible governance arrangements by combining wards with neighbouring parishes but this could have been undertaken much earlier, along with a consultation on Calne Town Councils requests for very simple boundary changes.

Sadly, the Committee have clearly rejected the view that the remainder of Calne Without could continue to be a perfectly viable council in its own right, despite it having the largest population of any parish in the Calne area. It already has 7 councillors, many of whom are long serving, experienced councillors. I think most people would find it hard to believe that an area with around 1250 voters, was not thought capable of sustaining a viable and competent parish council. Even if the quite reasonable request by Calne Town Council to incorporate the new housing development at Cherhill View into their boundaries was approved, there would still be around 900 voters in the remainder of Calne Without. A perfectly viable size for a parish council.

Calne Without PC has only in recent years provided any services at all and it would be inconceivable that the remaining part of Calne Without would have any difficulty in continuing to fund those few services that are currently provided. A contract to empty dog waste bins and the maintenance of a new (but little used) bus shelter should not prove a burden to the remainder of Calne Without

I and the vast majority of residents certainly don't believe a new parish could be damaging to community cohesion as there is little evidence of any community links or cohesion between Derry Hill/Studley and Lower Compton, Stockley or any of the other settlements in the remaining area. Community cohesion within a new Derry Hill & Studley parish could only flourish.

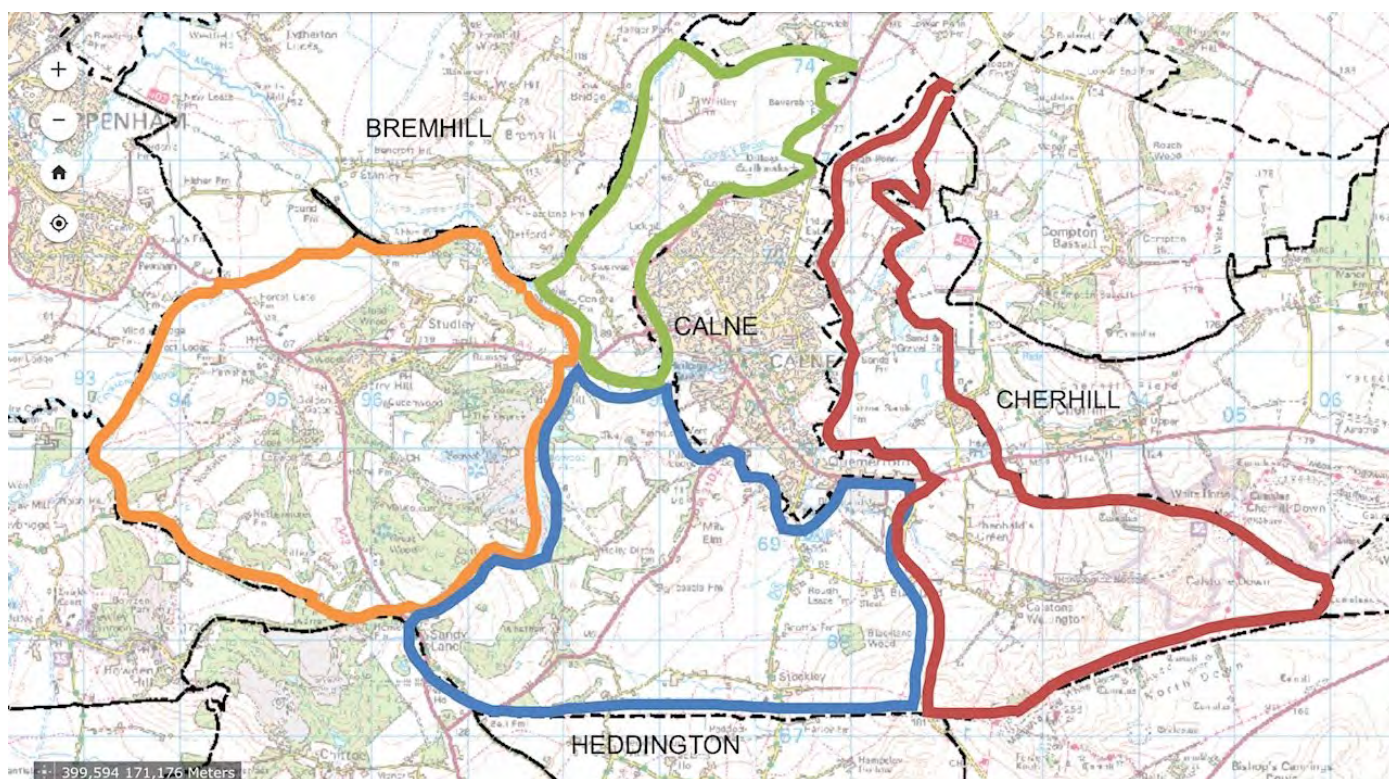
Whilst no one would deny that the remaining part of Calne Without has very few facilities, I think the Committee has misunderstood what connections there are between our local communities. That is because these settlements are all part of, or closely linked to, larger communities just across the parish boundary in adjoining parishes. People from Stockley, Calstone and Lower Compton do not use the facilities in Derry Hill & Studley nor have any recognisable links or cohesion with Derry Hill & Studley which are 5 miles away on the other side of Calne.

Stockley residents use the school, pub, village hall and church in Heddington which is only a mile away. They join with Heddington for their joint Steam Rally, and the Heddington and Stockley firework display. Similarly, residents of Calstone and Lower Compton use the school, pub, village hall and church in Cherhill which is again only a mile or so away. They even have to use polling stations in Heddington and Cherhill (not Derry Hill) to vote in Calne Without Parish Council elections.

Whilst I don't accept Wiltshire Councils view that the remainder of Calne Without is not capable of being a viable parish council on its own. I have always thought that there are benefits and opportunities for the remaining areas to amalgamate with their neighbouring parishes. Unfortunately, it was not appropriate for me as the originator of the petition to be prescriptive in setting out what should happen to the remainder of the parish. My thoughts were that with such overwhelming support for the petition, a new parish for Derry Hill & Studley would be created by May 2021, with the remainder of Calne Without continuing successfully as a parish until such time as the residents of that area judged that they should amalgamate with neighbouring parishes. Whilst I think that is likely to be the best way forward for the remainder of Calne Without, I didn't feel that it was really a decision for myself and other residents of Derry Hill & Studley. Just as a separate council for Derry Hill and Studley should not be blocked by parish councillors representing other communities. However with the Electoral Review Committee now recommended a much wider review in the future, I believe residents of the remaining parts of Calne Without would have an appetite to join with neighbouring councils such as Heddington and Cherhill if they were properly informed and consulted.

Whilst I strongly favour the creation of a new parish council in May, I welcome the committee's recommendation to expedite an early review and not invoke a two year delay.

The map below (apologies for my rudimentary IT skills) shows my suggestions of how Calne Without could be reorganised to create local councils based on existing communities with genuine links. The area bounded in orange is obviously Derry Hill & Studley. The red area which is the East Ward of Calne Without (containing Lower Compton and Calstone) could easily join with Cherhill PC and the blue area (the Middle Ward and Sandy Lane Wards) with Heddington PC. The green area has only about 90 voters, many of whom have strong links with Bremhill although some residents living close to the A4 may prefer to be part of Derry Hill & Studley. This could be accommodated and would not be unreasonable as the Boundary Commission have already decided that the green area should be part of West Ward from next May



With regard to Wiltshire Councils CGR survey, I was very surprised that the Committee didn't refer to the results of the survey. Having written to every household in the whole of Calne Without with a rather complicated survey which sought comments on over 20 proposals across the whole of Wiltshire, it seems regrettable that a summary of the huge 654 page document was not provided.

Having eventually found the responses to what was termed 'Scheme 40' which related to the petition for a separate parish council, I counted 84 responses to that part of the survey. 59 (70%) supported the creation of a new parish council for Derry Hill & Studley, 22 (26%) opposed it and the comments from 3 others relating to the need for consultation on the remainder of Calne Without joining with neighbouring parishes.

Putting aside the low response rate to the over complicated survey it would seem to provide a strong indication that even with a survey of every voter in the parish of Calne Without there was still a substantial majority in favour of a new parish council.

I'm disappointed that Wiltshire Council have not attempted any analysis of the responses or to prevent multiple responses from individuals. Simply reproducing all the responses received across the whole of Wiltshire in a huge 654 page document, leaving everyone to make sense of it, was not helpful.

Putting aside the low response rate to Wiltshire's over complicated survey it would seem to provide a strong indication that even with a survey of every voter in the parish of Calne Without there was still a substantial majority in favour of a new parish council.

Dear Kieran,

Both Woodborough and Manningford Parish Councils support:

Recommendation 5.1 That the area shown above be transferred from the parish of Manningford to the parish of Woodborough

- but with the caveat that the boundary is clearly on the southern side of the road to ensure the triangle at Freetrade is fully within Woodborough and that this is clearly shown on any map which is produced as a result of Implementing 5.1.

The first attachment shows a couple of screen shots highlighting the points where the boundary needs to be clearly defined to ensure no uncertainty in the future as to where responsibility lies!!

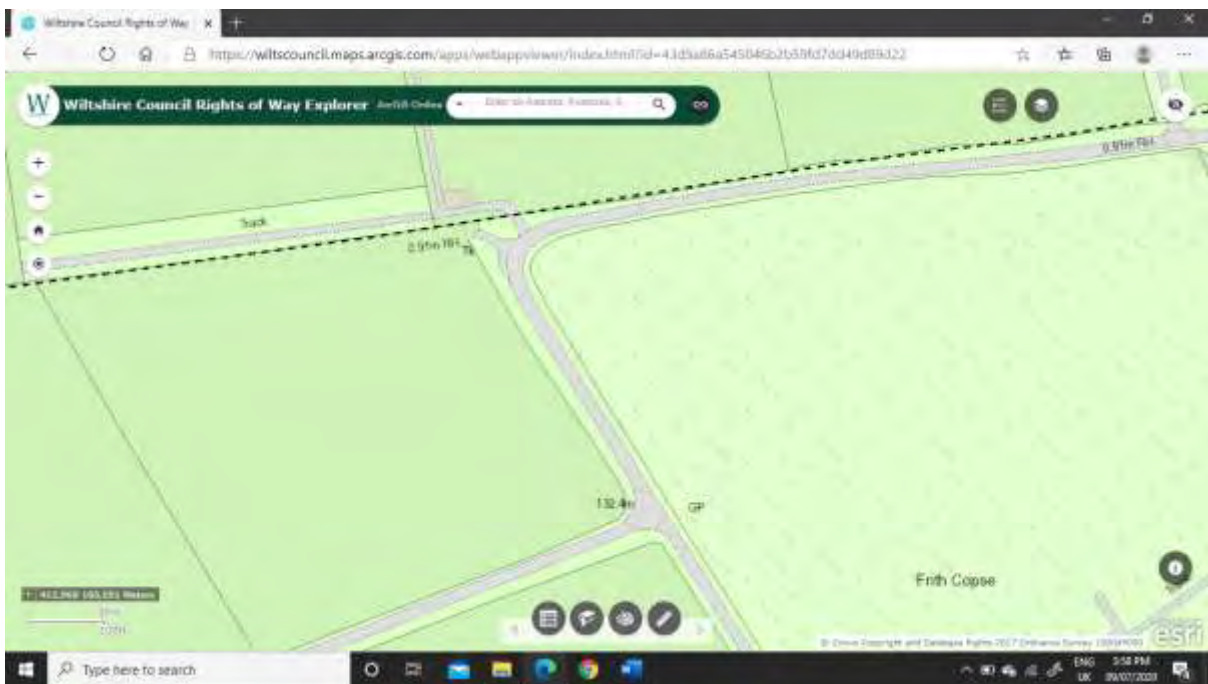
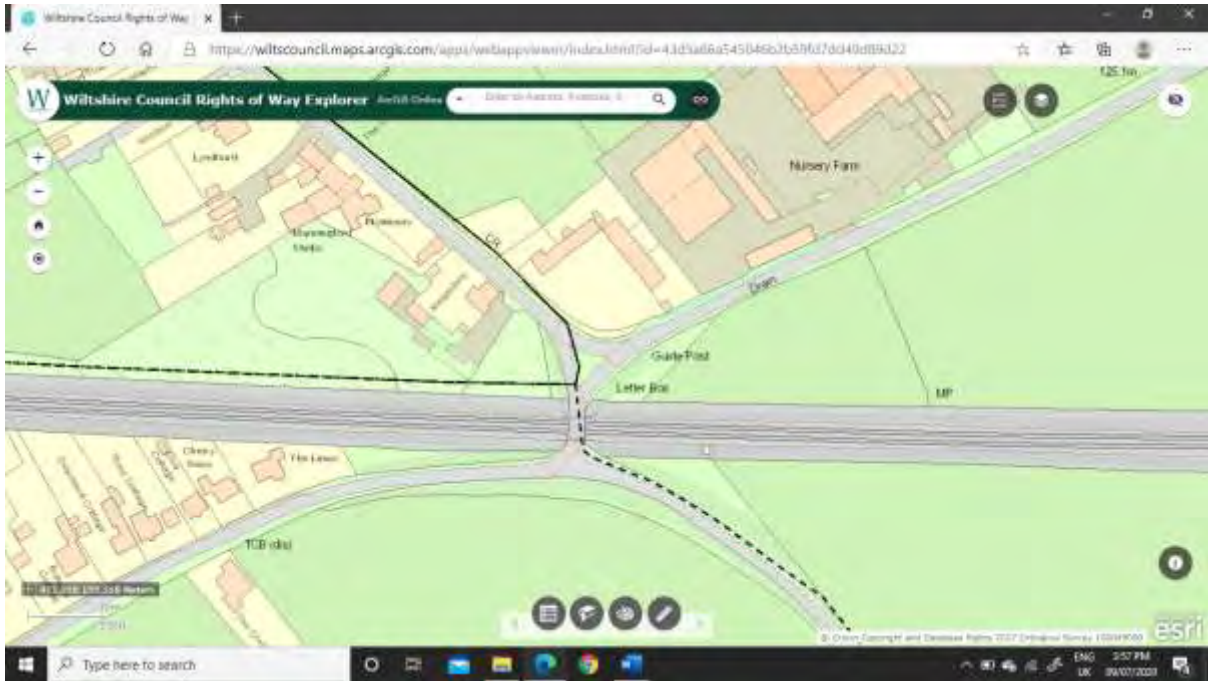
The current boundary shown running across the lower screen shot is of course the footpath denominated MANN2 and this will become a WOOD RoW once the Review is implemented. MANN2 does not continue beyond the suggested new boundary but terminates at the road.

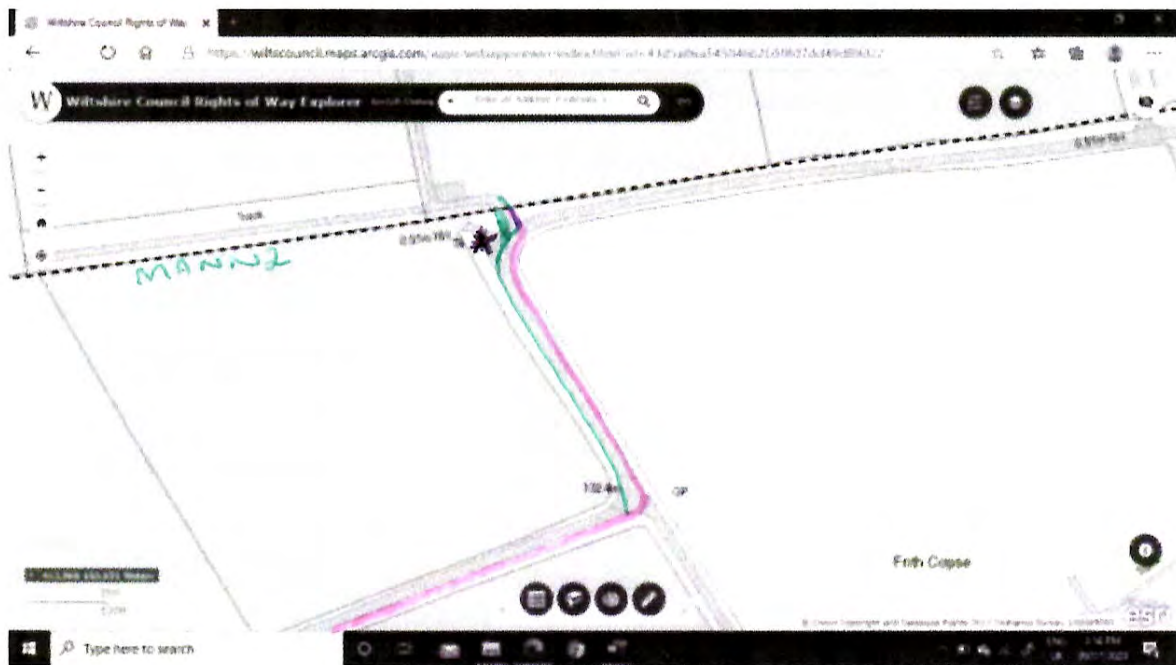
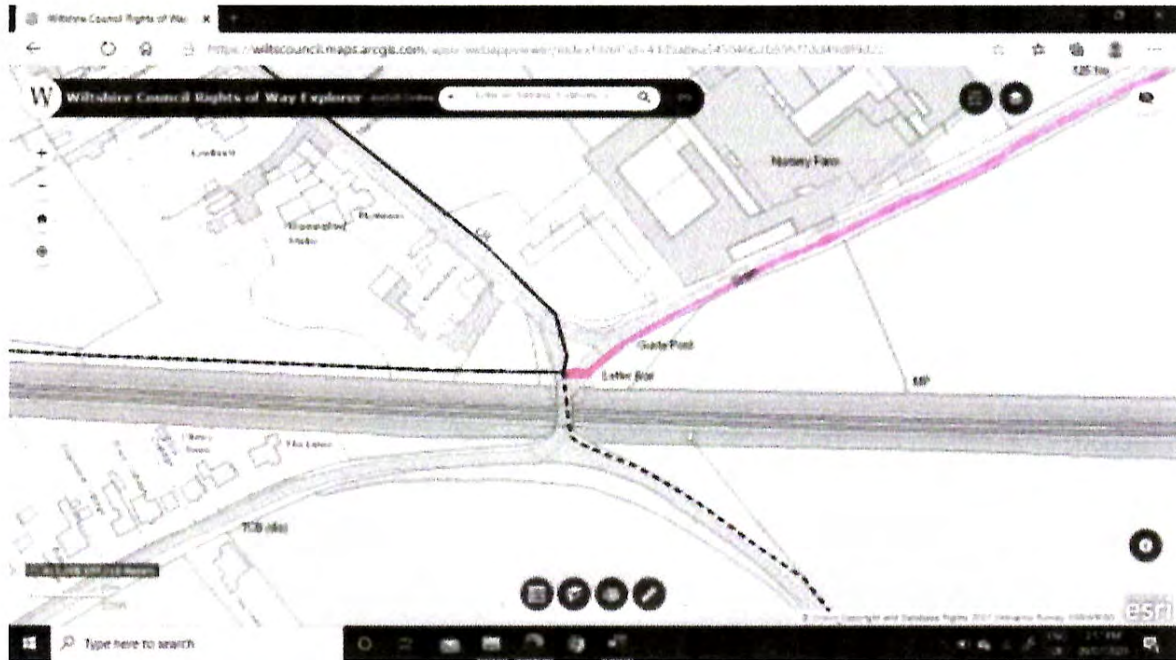
The second attachment is where I have shown - in pink - the suggested boundary. The western end near Freetrade is easy (top screenshot) but the eastern end near Frith Copse is a bit more tricky. The obvious course would be to continue the pink line round on the eastern verge but I think it would be simpler to keep the entire Copse, verge and all, in Manningford. Hence my green line. Most people access the footpath MANN2 via the pull-in I have marked with a black criss-cross, but I wonder whether we should be very specific and take the boundary to the track entrance. I am not convinced this map does full justice to the situation on the ground where the distinction between layby and footpath entrance has become blurred!

I thought I had sorted this out but on annotating the map I see it is not quite so straightforward as it appeared. So if you are happy to accept the support with caveat above as our official response to the CGR, I will ask my councillors to review the situation on the ground to ensure we get this boundary spot on.

Kind regards,

Ruth, Clerk to both Woodborough and Manningford PCs







NORTH BRADLEY PARISH COUNCIL

INCORPORATING

***NORTH BRADLEY, BROKERSWOOD AND
YARNBROOK***

North Bradley Parish Council's response to Wiltshire Council's Community Governance Review 2019-2020

Wiltshire Council's Electoral Review Committee has prepared draft recommendations where it believes parish governance arrangements in certain areas of Wiltshire should be changed. A consultation on the recommendations is currently underway from 15 May to at least 10 July and this is North Bradley Parish Council's response to Recommendation 11 which affects the boundaries of North Bradley.

1. This is entirely premature. The emerging Wiltshire Housing Site Allocations Plan (WHSAP) proposes two sites that are in or partly in the Parish of North Bradley. These are as follows:

Elm Grove Farm SHELAA 613, Wiltshire Housing Site Allocation Plan WHSAP Site H2.1 and Land Off 363 at White Horse Business Park SHELAA 298 (WHSAP Site H2.2), There are no buildings on 2.1 or 2.2 yet. Only one outline application is in, (still awaiting an amended Elm Grove Farm and Linden/Bovis Homes application) but none will not be ready for housing to start by next May 2021 deadline. Until it is known where precisely the houses will be sited, a decision cannot be made about whether they are akin to Trowbridge's urban area or the rural village.

2. The Trowbridge proposed land grab reduces the size of North Bradley Parish by over 25%.
3. The border proposed by Trowbridge Town Council is not logical. It follows the River Biss which is not the current south east border line. Using the river leaves a long narrow band c1.125km long and varying in width from c60m to 250m width, a total of c17.44 ha, which sits between the West Ashton parish boundary and the proposed new south east boundary.
4. Placing the land H2.1 and H2.2 (off Woodmarsh and Elm Grove Farm) within Trowbridge Town Council's limits will not speed up the expansion of their housing

supply. Both of these sites are already in the North Bradley Neighbourhood Plan. This has already reached Regulation 16, been approved and thus has now to be given considerable weight in any negotiations concerning territory. Indeed, transfer will have the opposite effect as both sites are contained within WHSAP already and North Bradley's Neighbourhood Plan. As already stated, North Bradley Parish Council has been in discussions with the developers of both sites. The parish council recognises of course that Wiltshire Council has a serious problem with the land supply as it fails to reach the 5.25 yr. allocation, currently showing a shortfall, at only 4.62 yrs. By transferring the sites to Trowbridge Town Council will not change that fact.

5. Regarding the existing properties and land that are being recommended for inclusion within the Trowbridge Town Council boundary, the three houses on Little Common and Woodmarsh are all of historical significance and are clearly of a rural nature. They do not fit into any "urban" scheme. More importantly, Drynham Lane residents are very particular about retaining their own separate hamlet and the Parish Council would like to think that the Elm Grove developers are taking residents' concerns into consideration when they submit their amended planning application. None of these houses want to be part of an urban development. Residents wish to preserve the rural integrity of their village now and in the future. In addition, the graveyard for North Bradley's Baptist church has been included within the urban development separating it from its Baptist Church which remains in North Bradley village. This will be impractical to administer.
6. Due to factors beyond the parish's control, the referendum for the Neighbourhood Plan was twice postponed and again postponed just a few hours before the March 19th. event. However, the Neighbourhood Plan has passed and been confirmed as having reached Reg. 16, which means that in essence the plan is now operative, carries weight and:

'that the plan can be given significant weight in decision making, as far as the plan is material to the application.' (Para. 107 Neighbourhood Plan Regs.) This applies exactly in this case.

7. Plus, advice from Wiltshire Council:
'Any parish Boundary change arising from the Community Governance Review (CGR) does not have an automatic effect on a designated neighbourhood area, which forms the foundation of a neighbourhood Plan'.
(Philip Whitehead, Leader of Wiltshire Council, 21st May)

This is supported by Briefing Note 20-20 recently issued. This states on page 2:

'Para. 14 of the Neighbourhood Plan makes special provision for areas with 'made' Neighbourhood Plans. This indicates that where the presumption of sustainable development applies, then the adverse impact of allowing development that conflicts with a Neighbourhood Plan is likely to significantly and demonstrably outweigh the benefits providing the following criteria all apply:

- i) The neighbourhood plan became part of the development plan less than 2 years ago;*
- ii) The neighbourhood plan contains policies and allocations to meet its housing requirement;*
- iii) The local planning authority has a 3-year housing land supply; and*
- iv) The local planning authority's housing delivery was at least 45% of that required over the last 3 years.*

The update of the five- year housing land supply is in progress, which will reset the base date to April 2019 (and cover the period to 31st March 2024). The allocations in the Wiltshire Housing Site Allocations Plan (WHSAP), which will improve supply, will be included in the calculation.

In other words, the North Bradley Parish Council Neighbourhood Plan, through agreeing with the inclusion of sites H2.1 and H2.2 in the plan, are supporting WHSAP and its outcomes. Transferring this part of the parish to Trowbridge Town Council will not advance the provision of housing within the Trowbridge Housing Marketing Area (TMHA) in any way.

8. The referendum for the parishes' Neighbourhood Plan was to be conducted on March 19 after two false starts due to a General Election and other problems. The parish was notified of the cancellation at 19:20 on the 18th. because of instructions from central government forbidding public meetings under the Covid 19 Emergency Regulations. Even though the Neighbourhood Plan carries Reg. 16 weight (see above) it has been impossible to record the residents' wishes concerning the final Neighbourhood Plan document. The parish council was denied the opportunity to carry out a full series of public meetings in order to seek the views of parishioners on this transfer. Under central government restrictions this would have been illegal and impossible with all public venues forced to close.
9. To suggest that this transfer would lead to an immediate increase in house building within the Trowbridge Housing Marketing Area (THMA) (let alone by May 2021) is not supported by the historical record. An example of why this is so can be found in the transfer of land from West Ashton Parish Council to Trowbridge Town Council at the last Community Governance Review a few years ago. At that time large portions of the Ashton Park Extension (first proposed in 1999 and agreed in the time of West Wilts District Council) were transferred, and yet no formal applications or requests

for planning permission have come forward. Indeed, at that time much was made of the land north of West Ashton Road (C49)/Blackball Bridge and the Leap Gate access road, which were described by Persimmon at one meeting with them, as ready for an immediate start. No such immediate start has been made, so history suggests that a start by 2021 is unlikely and even more doubtful for completion by 2024.

10. Please also refer to the accompanying section 8, pages 22 – 30, of the attached North Bradley Neighbourhood Plan, referendum document, which explains precisely the position of North Bradley Parish Council in its support of the WHSAP and the THMA and its need for progression in housing supply.

In conclusion, the reason for North Bradley's strong objection to this Community Governance Review proposal is the loss of a separate identity for the village. The Parish Council's aim is to take forward the Wiltshire Core Strategy policy of preserving the separate identity and landscape setting of North Bradley, while balancing this with the need to provide housing for the Trowbridge Housing Marketing Area which is required by WCS CP 29 and as proposed in the WHSAP as in the accompanying document. The Neighbourhood Plan (NP) policy effectively modifies and adds detail to the early draft policies of the WHSAP. This should be read together with the other policies of the NP, especially policies 2 and 3. The plan does not seek to impose a blanket restriction, as this would be unreasonable. The aim of the council's objection is not to stop all development around the village but to make its just contribution to the THMA and the Wiltshire Core Strategy whilst preserving the integrity of the historic parish boundary.

North Bradley Landscape Gap and Housing Sites in the Wiltshire Housing Site Allocations Plan (WHSAP)

Context	References
North Bradley Plan Objectives	1,6
Wiltshire Core Strategy	CP 1, 2, CP 29 (see especially paragraph 5.150), CP 50, 51.
NPPF	Paragraphs 8 (c), 28, 97 (e.g. Trowbridge FC ground), 127 (especially (c) and (d)),170.

- 8.6 Paragraph 5.150 of the Wiltshire Core Strategy states:
'It is recognised that the villages surrounding Trowbridge, particularly Hilperton, Southwick North Bradley and West Ashton, have separate and distinct identities as villages. Open countryside should be maintained to protect the character and identity of these villages as separate communities. The local communities may wish to consider this matter in more detail in any future community-led neighbourhood planning.'

The purpose of this policy is to respond to the invitation in the WCS and establish a 'Landscape Gap' between Trowbridge and North Bradley while accommodating proposed strategic housing sites from the WHSAP.

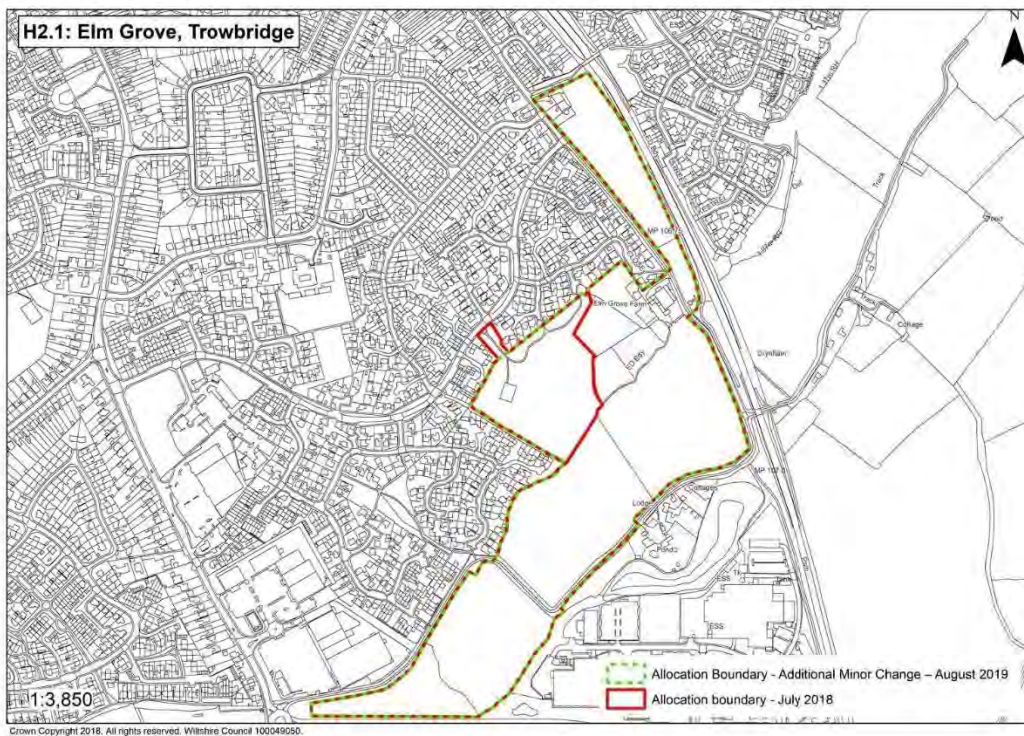
- 8.7 The emerging Wiltshire Housing Site Allocations PLAN (WHSAP) proposes three sites that are in or partly in the Parish of North Bradley. These are as follows:
- Elm Grove Farm SHELAA 613, WHSAP Site H2.1
 - Land Off 363 at White Horse Business Park SHELAA 298 (WHSAP Site H2.2) and,
 - Southwick Court SHELAA 3565 (WHSAP site H2.6).

Maps and basic descriptions of these proposed sites are given below:

- 8.8 In terms of the first two of these, it became clear during the plan making process that there could be a conflict between the wishes of the community (in the creation of a landscape setting 'gap' between North Bradley and Trowbridge) and the ambitions of Wiltshire Council's WHSAP, most particularly site 298 H2.2, located to the north-east of the village. Following community engagement, the Parish Council, supported by two Wiltshire Councillors, presented an argument to Wiltshire Council's Cabinet that, if the site could not be avoided (which the community preferred) then it should be reduced in size and development concentrated to the east and north, leaving as wide a landscape gap between the site and Trowbridge as possible. This was accepted and it was agreed that the LPA and the Parish Council should meet to discuss details. Wiltshire Council agreed to reduce the site in size from a level of 225 (proposed) to 175 homes.

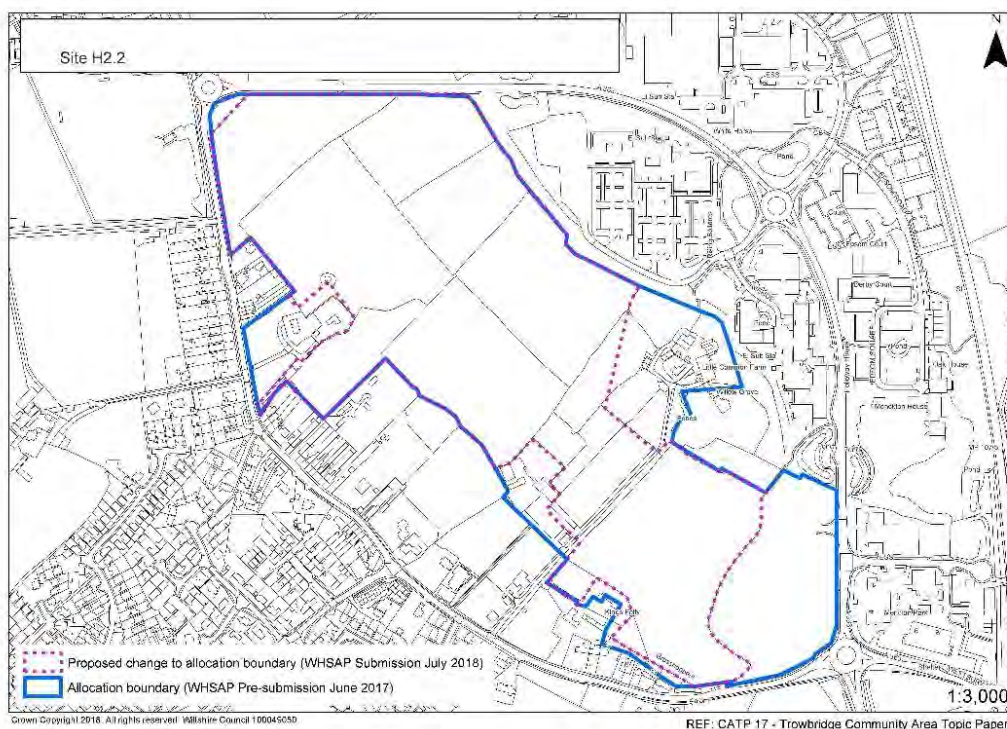
8.9 Elm Grove Farm SHELAA 613, WHSAP Site H2.1

The site is approximately 17.61 ha and is anticipated to accommodate approximately 250 homes and community facilities.



8.10 SHELAA 298 (WHSAP Site H2.2) Land off the A 363 at White Horse Business park

The site comprises 18.96ha of land and the anticipated number of new homes was 225 in the draft WHSAP, since reduced to approximately 175.



8.11 SHELAA 3565 (WHSAP site H2.6) Southwick Court

This site is located mainly in Southwick Parish, but has a small component in North Bradley Parish. The site is approximately 18.17ha in size and it is suggested that approximately 180 homes could be accommodated there.



- 8.12 While the need to accommodate some additional housing is accepted (particularly the 950 homes for Trowbridge referred to in CP 29 of the WCS) the North Bradley community does not believe that this would be sustainable if it destroyed the landscape setting of North Bradley. On the other hand, a neighbourhood plan cannot block a strategic scheme and compromise, through negotiation with the LPA, has proved to be necessary.
- 8.13 The accompanying Landscape and Visual Setting Analysis Report demonstrates why a Landscape Setting Gap is important and how this should be implemented, while accommodating the strategic sites proposed in the WHSAP. The conclusions of this expert and independent report are accepted.
- 8.14 The site at Elm Grove Farm (SHELAA 613, WHSAP Site H2.1) is on the north side of the A363 next to the built form of Trowbridge. In many ways, if development has to happen, this is an ideally located site, which seems likely to deliver sustainable development. It is therefore duly supported by this NDP as an acceptable location for housing or mixed-use development. Because the site is already being taken forward in the WHSAP it is not considered to be necessary to formally allocate it in this plan. However, the site needs to be carefully landscaped and there is also potential to incorporate significant public open space.
- 8.15 The site at 'Southwick Court' (SHELAA 3565 WHSAP H2.6) does contain a small element between North Bradley and Trowbridge. However, this is not felt to be significant enough an intrusion to oppose the site, which could be acceptable if correctly landscaped. Accordingly, the original landscape diagram provided in the Landscape and Visual Setting Analysis Report was revised following the Site Selection Report (April 2018) to exclude site 3565 H 2.6 from the proposed landscape protection area.

- 8.16 *'Land Off the A363 at White Horse Business Park'* site (SHELAA 298, WHSAP Site H2.2) did present a significant challenge to the aims of the emerging NDP. As taken forward in the proposed draft WHSAP following public consultation, this site was put forward for 225 homes. This was subsequently reduced to 175 homes. In addition, the NDP establishes a Landscape Setting Gap, designed to preserve in future a clear, undeveloped rural setting for North Bradley village. The Gap also serves to preserve biodiversity and prevent harm to the protected bats of the Bath and Bradford on Avon SAC. The extent of the Landscape Setting Gap is shown in the Policy Map above.

Policy 1: Landscape Setting Gap

The area shown on the Comprehensive Policy Map is designated as the North Bradley Landscape Setting Gap. The purpose of the designation is to protect the landscape setting of North Bradley village (the open spaces between the village and Trowbridge). This area will be maintained and where possible also enhanced for biodiversity and recreation. No development will be permitted in the North Bradley Landscape Setting Gap unless it is in accordance with policies in the development plan.

Where development is permitted, it must ensure that the functions, openness and landscape value of the Landscape Setting Gap is not harmed.

Existing facilities for informal recreation and sustainable transport must be preserved or enhanced. Any development must result in a net gain for biodiversity.

8.17 **Main Evidence Base**

Consultation Responses from Community Engagement
HRA – Wiltshire Council
Landscape and Visual Setting Analysis Report
NPPF – (as above)
SEA Scoping and Environmental Reports (AECOM, 2018)
Trowbridge Bat Mitigation Strategy Draft Feb 2019
Wiltshire Council Core Strategy 2015 Policy 29 (especially paragraph 5.150)
West Wiltshire Landscape Character Assessment 2007, Wiltshire Open Space Study
Wiltshire Housing Sites DPD Consultation Draft and evidence base.

8.18 **Justification**

The chief aim of the policy is to take forward Wiltshire Core Strategy policy in preserving the separate identity and landscape setting of North Bradley, while balancing this with the need to provide housing for Trowbridge as required by WCS CP 29 and as proposed in the WHSAP. The policy effectively modifies and adds detail to the early draft policies of the WHSAP. It should be read together with the other policies of the Neighbourhood Plan, especially policies 2 and 3. The plan does not seek to impose a blanket restriction since this seems unreasonable. It is not the aim of the plan to stop all development around the village, but to preserve the openness and greenness of the rural setting between North Bradley and Trowbridge. More detailed justification is found in the accompanying Landscape and Visual Setting Analysis Report.

- 8.19 The policy has secondary aims, reflecting the other important reasons why the spaces are so valued; as a resource for local biodiversity and recreation and sport (e.g. Trowbridge football ground which forms part of the Landscape Setting Gap to the north west, the footpaths and bridleways and the foraging area is used by the bats from the nearby SAC). It is the aim of the Plan to enhance these secondary elements of the Gap's importance for the benefit of the environment, for biodiversity and community and in the interests of achieving sustainable development over the parish as a whole.



View across Trowbridge Football Ground to Trowbridge

Housing - General

Context	References
NDP Objectives	2
Wiltshire Core Strategy	CP 1, 2, CP 29, CP 43, CP 45
NPPF	Paragraphs 11, 16, 28, 59, 62, 63, 69, 127, 170.

8.20 The Neighbourhood Plan Steering Group wanted to ensure that local housing needs were met, as this is a Plan Objective supported by community engagement. They therefore decided to gather evidence in the form of a housing needs survey (HNS) as a first step. The group also analysed recent windfall developments.

8.21 It was found that immediate local affordable housing need was relatively small. The HNS showed a current need for:

Subsidised rented housing	- None
Shared ownership / discount market homes	- 1 x 1 bed
Sheltered housing for older people	- None

8.22 Housing Needed

In order to meet the above need an allocation of 5 homes would be needed based on the prevailing rate of 30% affordable applying in the Trowbridge Area. However, this does not take account of need later in the plan period (since the HNS figure is valid only until 2020 and the NDP runs until 2026). Nor does this low number build in any flexibility.

8.23 Past and Future Windfall Developments.

Data supplied by Wiltshire Council (Appendix 8) shows that 16 homes were delivered through windfall developments (non-allocated sites) over the last 10 years. Were this delivery rate to continue then one might expect around 14 to be delivered during the 9 years of the NDP plan period.

8.24 However, all of these schemes were for less than 5 units, meaning that they delivered no affordable housing. This does not necessarily mean that no sites larger than this and so delivering some affordable housing will come forward over the NDP plan period. However, it does show that windfalls have historically not been reliable sources of housing.

8.25 In addition to accommodating the large WCS strategic site (2,500 homes) at Ashton Park, the community's positive approach to housing is therefore:

- to support strategic sites at 'Elm Grove Farm' (613, H2.1) and 'Southwick Court' (3565, H2.6) and 'Land off White Horse Business Park' (298, H2.2) subject to reduction in numbers at H2.2.
- to allocate sites to meet need over the plan period including an allowance to ensure flexibility and ensure housing types are delivered that are needed by the community
- to add policy detail to manage development in conjunction with national policies and those of the development plan
- to add policy detail to encourage innovative ways of providing housing.

This approach plans positively, meets local need and broadly reflects the wishes of the local community.

- 8.26 In terms of innovative housing, one option is to encourage self-build. Self-build or 'custom-build' is now part of the Government's Housing Strategy (Housing Strategy for England 2011) to deliver more, better and more affordable homes and local authorities are encouraged in Planning Practice Guidance (PPG) to create policies to facilitate this.
- 8.27 All new housing in the NDP area will lead to recreational impacts on core bat roosts in woodlands to the south of Trowbridge in combination with other developments. Any development in the Plan area should refer to the Trowbridge Bat Mitigation Strategy (TBMS). Developer contributions may be required to provide mitigation measures as set out in the TBMS.

Policy 2 – Housing

The community supports small-scale housing schemes and infilling within the settlement boundary of North Bradley, as shown on the Comprehensive Policies Map, that will conserve the rural character and setting of the village. The following are particularly encouraged.

- a. Self-Build Homes
sites delivering self-build housing will be encouraged within the settlement boundary of the village subject to acceptable impacts on the amenities of neighbours.
- b. Eco-homes
Innovative designs incorporating renewable energy, sustainable construction methods or habitat enhancement are welcomed and will be encouraged subject to acceptable impacts on neighbours.
- c. Retirement homes, sheltered accommodation or other homes specifically designed or adapted for the less able or for the retired population will be considered favourably.
- d. Affordable homes comprising entry-level homes that offer one or more types of affordable housing as defined in Annex 2 of the NPPF will be supported.
- e. All developments should aim to enhance local habitats for wildlife by design, such that development creates a net gain for biodiversity overall.

- 8.28 **Evidence Base**
Community Engagement / Consultation Statement
SEA Scoping and Environmental Reports (AECOM, 2018)
Scoping Report, Housing Needs Survey, Review of recent windfall development
Trowbridge Bat Mitigation Strategy Draft Feb 2019
Wiltshire Housing Site Allocations Plan, NPPF, PPG.
- 8.29 **Justification**
The policy responds to the NPPF's encouragement to 'plan positively', accepting the WHSAP strategic sites (albeit with caveats). Self-Build and other housing is also encouraged. Planning Practice Guidance (Paragraph: 025 Reference ID: 57-025-201760728). A net gain for biodiversity from development sites is sought as suggested by the SEA.

Housing Site

Context	References
NDP Objectives	2, 6
Wiltshire Core Strategy	CP 1, 2, CP 29, CP 43, CP 45
NPPF	Paragraphs 16, 18, 28, 29, 59, 62, 69, 127, 170.

8.30 Site selection has reflected the aim of:

- Meeting local housing needs including those throughout the plan period
- Accepting the wishes of the community and creating a plan capable of passing referendum
- Delivering a balanced plan that includes both provision of development and environmental protection. A plan that on the one hand attempted to protect a large area of landscape, while not providing people with enough homes to live in in future years, seemed unlikely to be regarded as delivering sustainable development.

8.31 The SSR (Site Selection Report) explains part of the rationale for selecting the following site, although other information is contained within the Consultation Statement (CS) and the process is summarised in Section 7 of this Plan, and all three documents should be referred to in order to understand how the process unfolded. The total number of homes allocated over the whole plan period to 2026 is 25, with 30% of these being affordable. It is also noted that further housing is likely to be delivered by windfalls, potentially including the recently proposed development at The Pavilions (White Horse Business Park) Reference: 19/01835/PNCOU.

8.32 The site selected by the NDP is well-related to the existing developed area of the village and does not impact on the proposed landscape protection area indicated in Policy 1. It is suitable, available and deliverable as set out in the SSR.

8.33 The HRA for the WHSAP identified the Bath and Bradford on Avon SAC, an important habitat for bats, to be a constraint on development in the area. The HRA suggested that;

'...the need to protect important habitat features is expressly stated in the relevant policies.'

The HRA then went further and stated that ecological studies would be required in advance of development and that risk of harm to the bats through recreational pressure from new development would be managed through implementation of a Trowbridge Recreation Management Mitigation Strategy and by site specific HRA's on proposals.

With the above in mind, and reflecting the concerns of the County Ecologist expressed during the SEA and HRA Screening for the NDP, the NDP requires the above site to be accompanied by an appropriate ecological evaluation of impact and a statement explaining how it will meet the requirements of the Trowbridge Bat Mitigation Strategy.

8.34 The SEA, acting on advice received from Natural England, recommended that the NDP should seek a net gain for biodiversity. Since development is the most likely aspect of the plan that could harm biodiversity it seems appropriate to require development of the allocated site to deliver a net overall gain for biodiversity.

- 8.35 One site is allocated for development as set out below and is shown on the Comprehensive Policies Map. The site has various constraints. The main issues, identified in the policy below, will require addressing prior to development commencing. This is not an exhaustive list of all relevant planning matters.

Policy 3 – Housing Site

The site at 54 Woodmarsh, with an area of 1.12 ha, is allocated for approximately 25 homes, with 8 of these being affordable subject to:

- i. Access to be via Woodmarsh Road. Satisfactory and detailed site layout and access design to be agreed prior to development commencing. Due to the site shape and surrounding properties, in order to create a workable design under WCS Core Policy 57, it may be necessary to reduce the number of dwellings from the approximate figure indicated.
- ii. Screening and separation from neighbouring properties will be required to protect the amenity of those living there.
- iii. Suitable screening and sound reduction measures would be required to protect new homes from noise from Progressive Hall as it is used for meetings and in Summer has to have open windows for ventilation.
- iv. In view of the risks this development presents to the SAC, this development will be expected to be surveyed, designed and mitigated in full accordance with the Trowbridge Bat Mitigation Strategy. Full mitigation for loss of habitats must be achieved within the application boundary
- v. The design should deliver for a net gain for biodiversity
- vi. The design of any scheme must avoid harm to the historic but unlisted Kings Lodge and Progressive Hall, their settings or any other heritage assets including the Baptist Burial Ground to the north east.
- vii. Given the age of the settlement of North Bradley and the presence of archaeology shown in the Historic Environment Record, a field evaluation will be required prior to development to inform the significance of heritage assets impacted by the proposals.
- viii. Charging points for Ultra Low Emission Vehicle (ULEV) should be included
- ix. Due to the lack of comprehensive public storm water drainage and sewerage in the area, drainage and sewerage from the site must be designed to prevent flooding. The advice of the Drainage Authority should be sought. Drainage should be designed to include SuDS where appropriate.

Point iv. reflects protected status of the bats of the SAC. NPPF paragraphs 170 and 174.

Point v. A net gain for biodiversity was recommended by the SEA and is required by NPPF paragraph 170

Point vi. reflects the comments of the LPA's Conservation Officer. Care will be needed with design to protect the historic but unlisted Kings Lodge and Progressive Hall.

Point vii. and point viii. respond to advice in paragraphs 189 and 102/104/105 of the NPPF respectively

Thank you. All noted. If approved, the boundary change would be contrary to WC policy as outlined and thus undermine and render challengeable the entire document.

Best,
Andrew

Item 27

RT HON DR ANDREW MURRISON MP

Item 28

Hi Kieran

Good to talk to you earlier.....

Thank you for the clarification on councillor numbers per wards for the current CGR proposals under Recommendation 13.

Recommendation 13.1 states

For Melksham Without Parish Council it had been requested that the additional parish councillor who would have represented Hunters Wood instead represented Beanacre, Shaw and Whitley, for a total remaining at thirteen

We discussed the current make up of the wards and what these would look like if the Recommendations in 13 were approved in September.

CURRENT CLLR SPLIT PER WARD

Beanacre/Shaw/Whitley	3
Bowerhill	6
Berryfield	2
Blackmore	2
TOTAL	13

PROPOSED CLLR SPLIT PER WARD

Beanacre/Shaw/Whitley/Blackmore Hunters Wood)	4 (AS PER RECOMMENDATION 13.1 absorbs cllr from Blackmore Ward from
Bowerhill	7 (will take other cllr from Blackmore Ward as Sandridge Place is in
Bowerhill division as per LGBCE)	
Berryfield	2
Blackmore	NIL – will no longer exist
TOTAL	13

Many thanks for your time, see you early September for the decision!

Kind regards

Teresa

Teresa Strange

Clerk

Melksham Without Parish Council

Sports Pavilion

Westinghouse Way

Bowerhill, Melksham

Wiltshire, SN12 6TL

01225 705700

clerk@melkshamwithout.co.uk

www.melkshamwithout.co.uk



Reference: RM298/CGR4

6th July 2020

Kieran Elliott
Senior Democratic Services Officer
Wiltshire Council
County Hall
Bythesea Road
Trowbridge
BA14 8JN

Dear Mr Elliott

CGR Scheme 4 : Lacock

With reference to the deadline of the 10th July for the Draft Recommendations for the above named Community Governance Review Scheme 4 : Lacock, please find this letter by way of representation of my views for provision to the Electoral Review Committee for consideration. My **objections** are four fold;

- The reference to Rowden Hamlet as urban, by way of transferring to Chippenham, is incorrect
- The historic connections of Rowden Hamlet, dating back to the 16th Century, have been over-looked
- The move of Parish, away from Lacock will significantly erode my Lacock based business and marketing
- Attraction of house buyers in to the Parish of Lacock, significantly differ in calibre to the house buyers within the Parish of Chippenham, impacting a property's marketability and price

As a resident of Rowden Hamlet : [REDACTED] the site is a scheduled monument with Historic England as home to the original 16th Century Saxon Fort, protecting the river valley line to Lacock and the 16th Century Saxon Church of St Cyriac's in Lacock.

I have been made aware of documentation within the CGR consultation process which makes the following reference and reasoning as to why Rowden Hamlet should be moved from the historic roots of Lacock Parish to Chippenham;

"Whilst the areas in question were largely undeveloped at the present time, significant development was projected and the characteristics of the areas would be urban, not rural such as was the case with the remainder of Lacock and Langley Burrell Without parishes, as the parish councils themselves had noted."

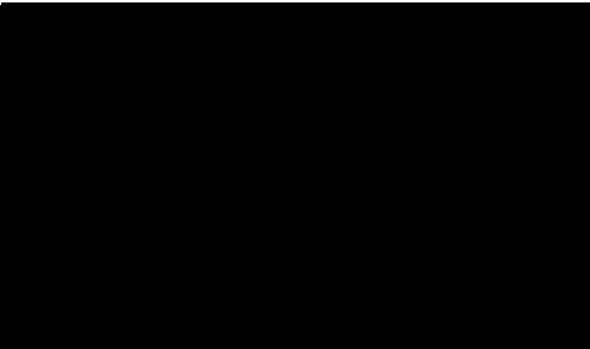
Rowden Hamlet, as part of Lacock Parish, sits within a rural conservation area. This area cannot be urbanised due to the conservation protection afforded to the Lacock Parish river valley. Rowden Hamlet's 16th Century Saxon fort site and river valley walks in to Lacock are sought out and frequented by tourists and form the basis of my only source of business and revenue, running holiday lets at The Dovecote and Deer Cottage, Lacock.

Lacock is a recognised tourist attraction for the London tourists extending their tourism to encompass Stonehenge, Lacock and Bath – and a personal consideration against the move of Rowden Hamlet away from Lacock Parish – is that it will completely displace my business and revenue.

It is my understanding that that the meetings of the Committee and Full Council will be most likely held virtually with members of the public able to participate with statements. Should the CGR Committee not amend its draft recommendation there is potential that the Full Council make not choose to approve the CGR Committee's draft recommendations.

Therefore, please could you advise me by return of the dates and process for these meetings. I should like this letter to be put forward for consideration to the Electoral Review Committee and as per the process made available publicly (anonymised).

Yours sincerely,





8/7/2020

Community Governance Review – North Bradley Parish

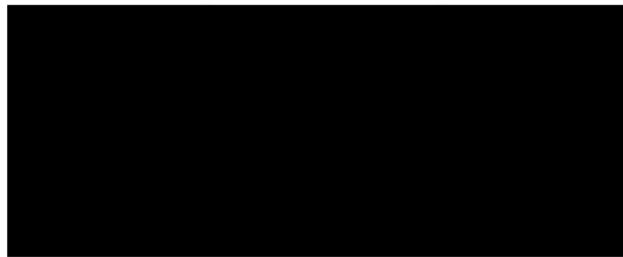
Please note, I object most strongly to the proposal to transfer parts of North Bradley Parish to Trowbridge Town Council.

This will destroy the parish in its present form. This has existed for well over a 100 years and the current proposal will remove c25% of its area. Furthermore, it is the area which is closest to the heart of the village and contains some of its oldest and most historic parts, namely the old Baptist Church and the village's graveyard, the only burial ground which still has plots available in the district.

The move is entirely premature as there are no buildings on either the Drynham Lane or Woodmarsh/Whitehorse Business Park sites, they are still open fields. Thus, neither can be considered part of the conurbation of the town. To insist that they are to be transferred in time for the next May elections does not make sense. Why would Trowbridge wish to destroy the parish by taking over these open spaces so early? Could there be some financial incentive?

North Bradley Parish accepts that there is a housing problem within Wiltshire and the Trowbridge Housing Marketing Area, which has only 4.6yrs of the 5.25yrs for which it should plan. The Parish Council, through the North Bradley Neighbourhood Plan, accepts that development and expansion of the settlement boundary is inevitable, but this will not happen by May 2021. Indeed, developers have already produced outline plans for housing on these sites, and with whom the parish council is actively engaged, but these will not be built and in existence for many years. At that time some discussion of boundary changes might be appropriate but are currently grossly premature and unwarranted.

Please note, that if a transfer is in in place by May 2021, your council will be doing a gross disservice to the parish of North Bradley.



Item 31

Community Governance Review
Democratic Services
Wiltshire Council
Bythesea Road
Trowbridge
BA14 8JN

July 2020

To whom it may concern

I am writing to object to Wiltshire Council's recommendation to alter to boundary for North Bradley.

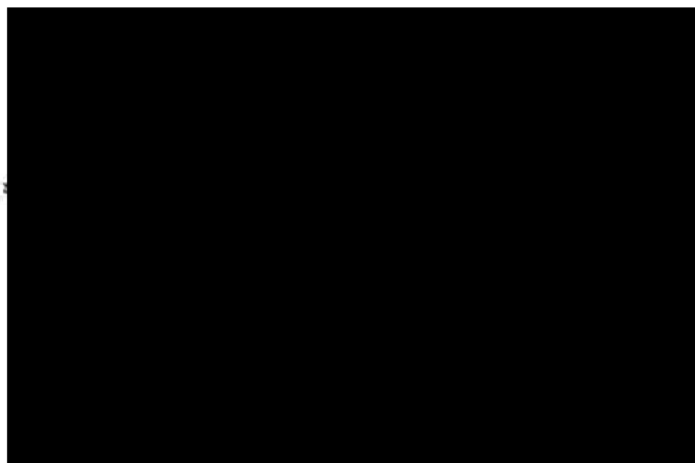
I want to keep North Bradley as it is, a rural village.

I do not want North Bradley to be part of Trowbridge.

Yours faithfully

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Community Governance Review
Democratic Services
Wiltshire Council
Bythesea Road
Trowbridge
BA14 8JN



July 2020

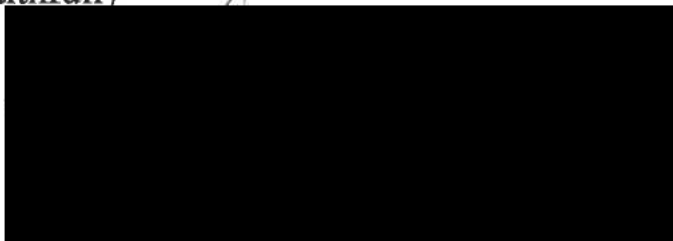
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Community Governance Review
Democratic Services
Wiltshire Council
Bythesea Road
Trowbridge
BA14 8JN

July 2020

To whom it may concern

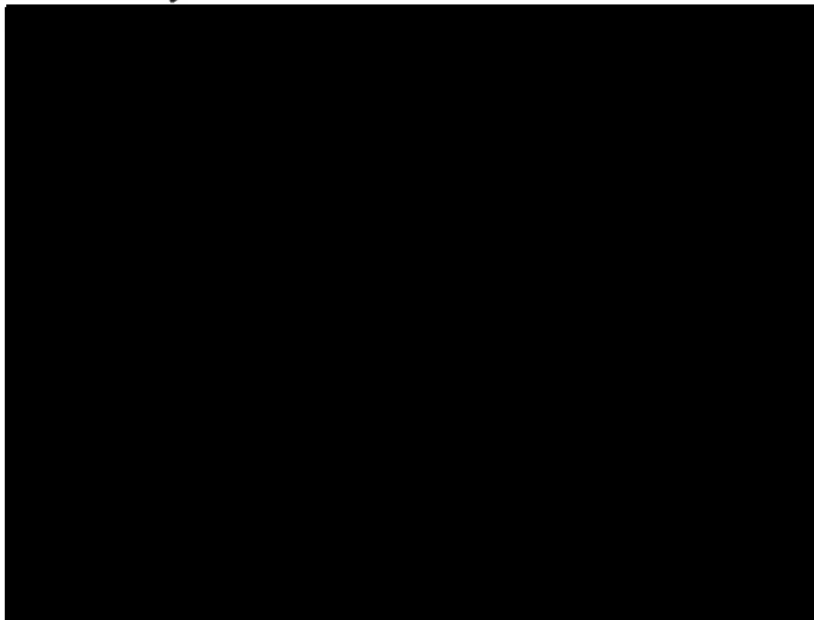
RE: - WILTSHIRE COUNCIL'S BOUNDARY REVIEW OF
NORTH BRADLEY VILLAGE.

I am writing to object to Wiltshire Council's recommendation to alter ~~the~~ boundary for North Bradley.

I want to keep North Bradley as it is, a rural village.

I do not want North Bradley to be part of Trowbridge.

Yours faithfully



Community Governance Review
Democratic Services
Wiltshire Council
Bythesea Road
Trowbridge
BA14 8JN

July 2020

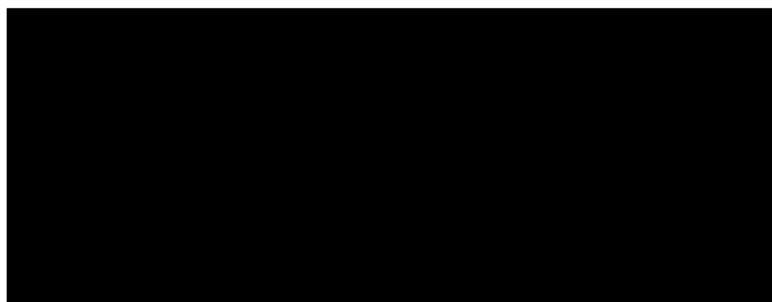
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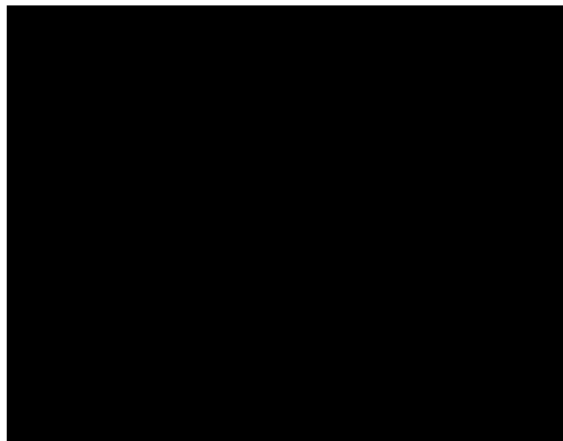
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Community Governance Review
Democratic Services
Wiltshire Council
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Trowbridge
BA14 8JN



July 2020

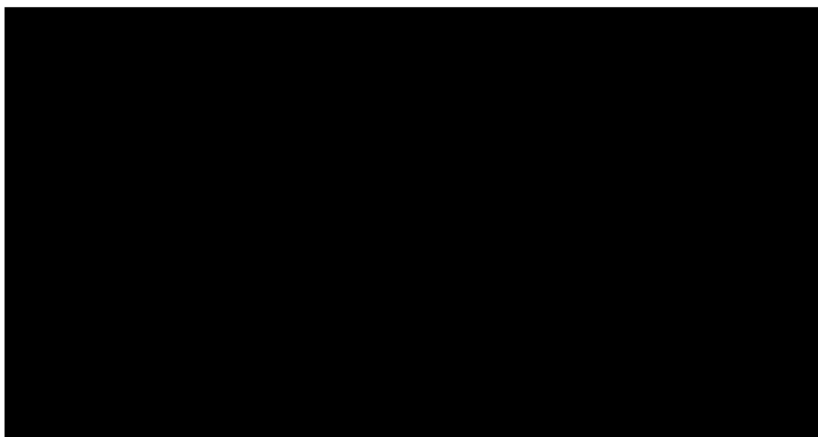
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July 2020

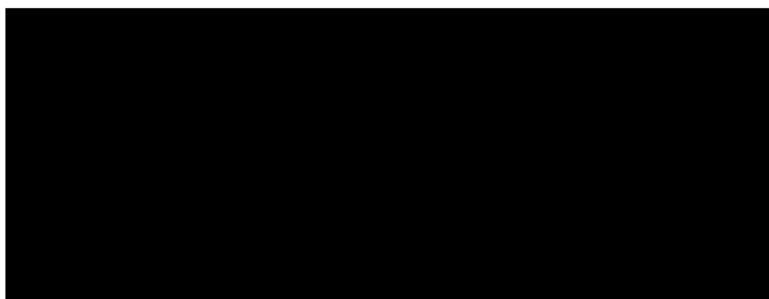
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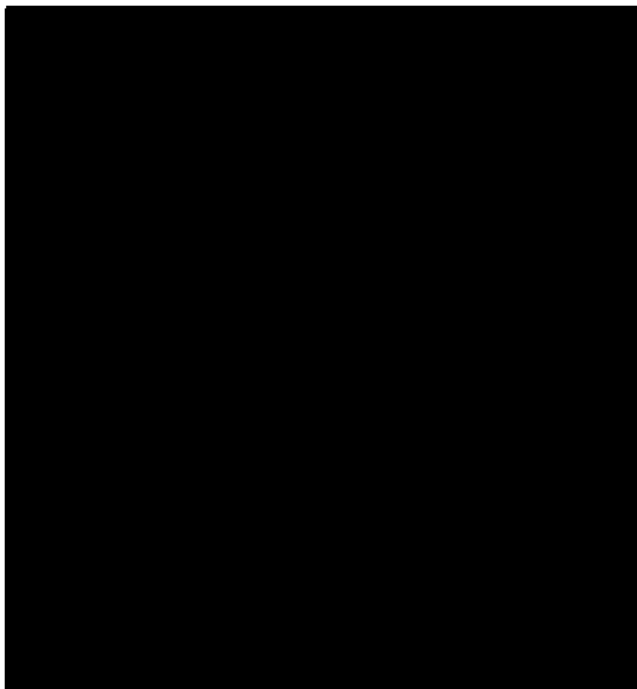
Yours faithfully



Community Governance Review
Democratic Services
Wiltshire Council
Bythesea Road
Trowbridge
BA14 8JN

July 2020

To whom it may concern

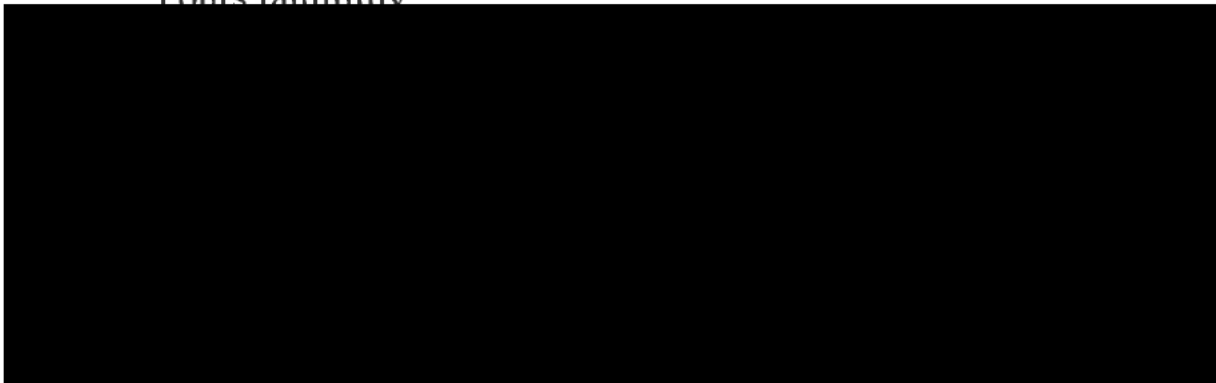


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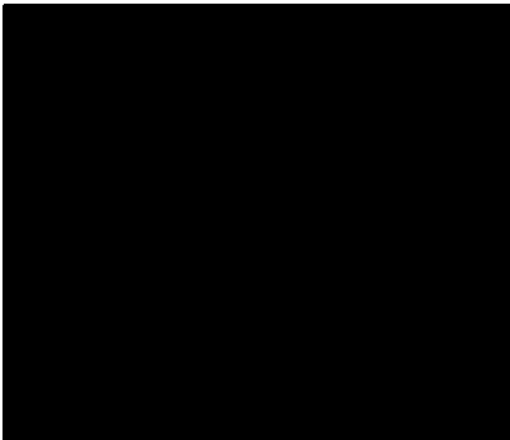
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Community Governance Review
Democratic Services
Wiltshire Council
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July 2020

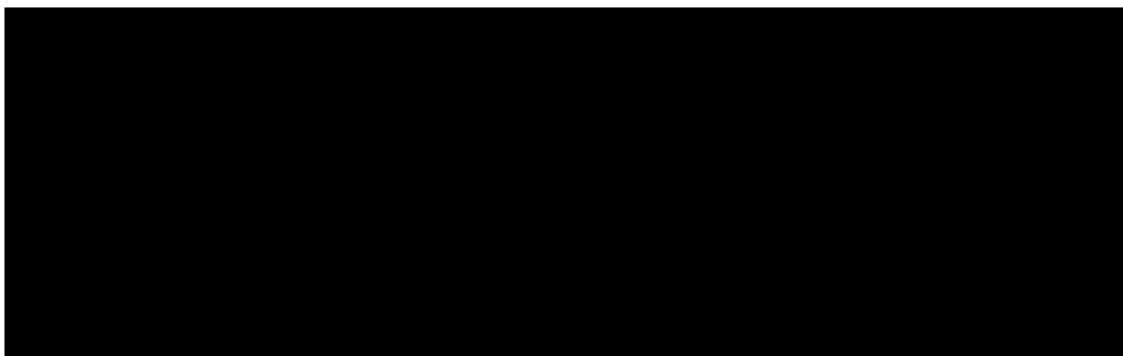
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Yours faithfully



Community Governance Review
Democratic Services
Wiltshire Council
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July 2020

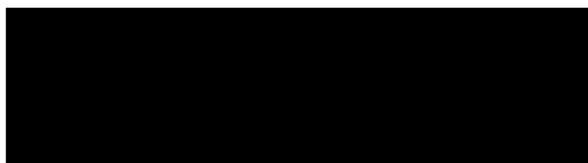
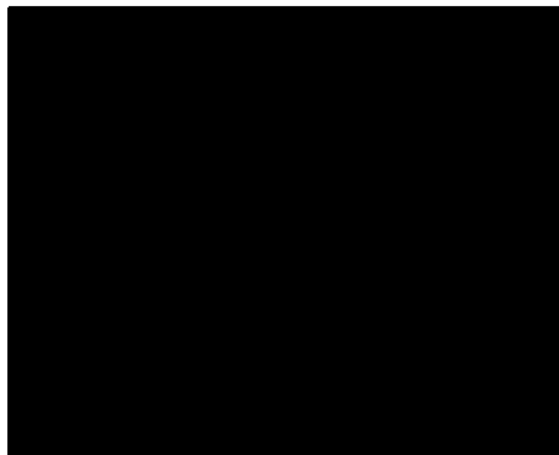
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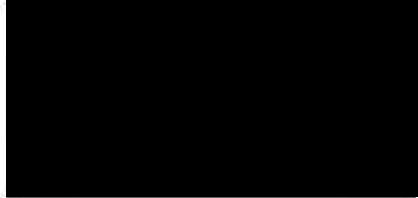
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Community Governance Review
Democratic Services
Wiltshire Council
Bythesea Road
Trowbridge
BA14 8JN

At July 2020


To whom it may concern

I am writing to object to Wiltshire Council's recommendation to alter *to the* boundary for North Bradley.

I want to keep North Bradley as it is, a rural village.

I do not want ^{*any part of*} North Bradley to be part of Trowbridge.

Yours faithfully



*My grandparents lived in Kings Farm
House, my mother, sister and brother were
brought up there my brother now deceased
was born there. I have lived in Bradley
since 1964. I see no valid reason why
our boundaries should be altered.*

Item 33

From: [REDACTED]
Sent: 17 June 2020 14:35
Subject: The proposed changes to the parish boundary of North Bradley - update

Dear Sir

Update.

Unfortunately we were mis-informed... it is Trowbridge Town Council that is wanting the two Wards of North Bradley Parish. Please amend where necessary.

We still do not want to lose any of our Parish!

Yours

[REDACTED]

Re the proposed changes to the parish boundary of North Bradley.

We are concerned that Wiltshire Council is proposing to take the areas of the White Horse ward and the Park ward of North Bradley parish and merge them into Trowbridge. This will mean the considerable loss of about 25% of our village, and less of a clear break between North Bradley and Trowbridge. We fear that this may well lead to the Council swallowing up North Bradley and it becoming just another part of Trowbridge. Having moved to the village 12 years ago we have grown to love this village and its community spirit, and we do not want the integrity of the village to be lost. Please do not let this happen.

Yours sincerely

[REDACTED]

Dear Senior Democratic Services Officer,

This is my delayed response to the Community Governance Review consultation outlined in my telephone conversation with you on Friday 10 July 2020.

I gather that the reference to the parish of Southwick in your Circular e-mail headed Briefing Note Number 20-18 Community Governance Review Consultation and sent 06 May 2020 15:45 was in error and that the Draft Recommendations do not affect that parish.

I am doubtful that the procedure followed by Wiltshire Council during its previous Community Governance Review was lawful; Full Council was certainly entitled to reject all or any of the recommendations of its Working Party, chaired by Cllr Stuart Wheeler, but it was not entitled to adopt alternative proposals not recommended by its Working Party (without repeating the statutory consultation procedures laid down for Community Governance Reviews).

Accordingly, I draw your attention to the case law on Community Governance Reviews, namely:-

Offerton Park PC v Stockport MBC [2011] EWHC 2247 (Admin) - 24 August 2011 - <https://www.bailii.org/ew/cases/EWHC/Admin/2011/2247.html>

Campbell Park PC v Milton Keynes Council [2012] EWHC 1204 (Admin) - 26 April 2012 - <https://www.bailii.org/ew/cases/EWHC/Admin/2012/1204.html>

Britwell PC v Slough BC [2019] EWHC 998 (Admin) - 17 April 2019 - <https://www.bailii.org/ew/cases/EWHC/Admin/2019/998.html>

These cases are authority for the view that the statutory provisions and procedures set out in the Local Government and Public Involvement in Health Act 2007 must be strictly adhered to, and that the Guidance on Community Governance Reviews (March 2010), being statutory guidance issued under Section 100(4) of the Act, must be properly understood and taken into account.

I agree with North Bradley Parish Council (summarised at [69] of the Draft Recommendations) that recommendation 11 is premature.

The Guidance (at [50] and [59]) indicates that its views should be regarded as "of central importance" and "the primary consideration".

It appears that the reasoning to the contrary in [70] to [76] and [78] to [81] of the Draft Recommendations is based entirely or almost entirely on a mistaken interpretation (and errors of law) of the scope of the provisions for Community Governance Reviews in the 2007 Act (and the statutory guidance on them issued in March 2010), and incorrectly elides them with the rules and regulations for the Electoral Review of Wiltshire Council carried out by the LGBCE.

In particular, the assertion in [69] "that statutory guidance was clear that it was not merely the situation as it existed which was relevant but also any change to the number and distribution of electors within five years of the start of the review, taking into account planning permissions, local plans and assumptions" and repeated in [75] and [79] is simply wrong; there is no such "relevant five-year period" stipulated in the statutory guidance for this purpose.

Indeed, while a broad reading of the 2007 Act might allow such an approach (although the present tense of Section 93(4) Duties when undertaking a review indicates otherwise), the relevant parts of the statutory guidance, particularly [15] and [26], are very clear that it is the present circumstances on the ground, and not future projections/forecasts/plans/assumptions etc., that are the relevant considerations (the repeated use of the word "following" in [26] is especially compelling).

The Britwell case demonstrates that misunderstandings/misinterpretations of the statutory guidance are fatal to the lawfulness of Community Governance Reviews.

As so much of the relevant parts of the Draft Recommendations are taken up with electoral projections, etc. (quite wrongly in my opinion), I have attached copies of the e-mails I sent on Thu 14/02/2019 16:16 and Sat 09/03/2019 16:31 on the 2024 Electorate of Wiltshire figures (which demonstrated that those projections were grossly inaccurate and excessive) and that I sent on Fri 05/04/2019 13:09 on the Electoral Review proposals for the parish of North Bradley (and it appears that retrospectively Wiltshire Council now shares those views).

Nevertheless, nothing in the outcome of the Electoral Review of Wiltshire Council seems to me to justify Recommendation 11.

For the reasons set out above, I do not consider that the recently adopted Wiltshire Housing Sites Allocation Plan has any direct bearing on this matter either, but there is plainly a major inconsistency in the Draft Recommendations between its treatment in the reasoning for Recommendation 11 and its treatment in the reasoning (at [82] to [92]) against very similar proposals elsewhere around Trowbridge, particularly since some of the projected development there is considerably more advanced than that in the White Horse and Park Wards of the parish of North Bradley.

Indeed, the large Ashton Park development (with its Outline Planning Permission) is proceeding so slowly that it seems to me unlikely to have made sufficient progress to significantly affect any of the figures shown for the electorate even in 2024.

Dear Senior Democratic Services Officer,

Attachment below of my e-mail sent Fri 05/04/2019 13:09 on the Electoral Review proposals for the parish of North Bradley.

Yours sincerely,

[REDACTED]

From: [REDACTED]

Sent: 05 April 2019 13:09

[REDACTED]

Subject: Wiltshire electoral review (Ref: 15520) - Draft recommendations - February 2019

Dear Review Officer,

Thank you for your e-mail below.

Your figures for the 2018 electorate of the parish of North Bradley (polling district GC1) show clearly one of the problems I suspected as flowing from [194] of the LGBCE Report - that the proposed Park ward of North Bradley Parish Council will have only THREE electors at the 2021 election! Although Wiltshire Council has still not given me the corresponding figure for its proposed White Horse ward, I do not think it will exceed about SEVEN electors at the same election.

Turning to the figure of 372 you mention, it is in fact simply the difference between the 2018 electorate of the whole parish (1,426) and Wiltshire Council's forecast of the 2024 electorate of its proposed Village ward of the parish (1,798), so the way it has been dealt with by the LGBCE in its figures makes no sense at all.

The correct methodology would have been to identify the effect of the boundary changes it proposed to the Wiltshire Council scheme figures.

Unfortunately, that too is unclear - [160] of the LGBCE Report states "*We have modified those boundaries, however, by the inclusion of the White Horse Business Park and the site of proposed development which is adjacent to it in Trowbridge Drynham division*", but the location and nature of "*the site of proposed development which is adjacent to it*" is not explained any further, so how it affects the 2024 forecasts is uncertain.

The accompanying map also shows another and separate boundary change to the Wiltshire Council scheme transferring all the existing properties on the north east side of Woodmarsh and Westbury Road North Bradley from Wiltshire Council's proposed Village ward to the LGBCE's White Horse ward, and which (together with those at Drynham backing onto the White Horse Business Park and so presumably also being transferred to the LGBCE's White Horse ward) your e-mail's analysis of GC1 suggests amount to about 100 electors in 2018.

I do not think that removing the White Horse Business Park or the north east side of Woodmarsh and Westbury Road North Bradley from the Southwick Division assists either in *Ensuring that the recommendations reflect community identity* or in *Providing arrangements that support effective and convenient local government* (see [4] of the LGBCE Report).

If the effect of the LGBCE scheme is to exclude all the sites of expected housing development on the edge of Trowbridge from the Village ward of North Bradley, it will reduce the 2024 forecast electorate of that ward from 1,798 to 1,371, increase that for the White Horse ward from 541 to 968, and leave that for the Park ward unchanged at 1,462.

So the figures for 2024 in Appendix A of the LGBCE Report should be:-

Division 75 (Southwick) - 3,743 (instead of 3,830)

Division 82 (Trowbridge Drynham) - 4,433 (instead of 4,173)

Division 85 (Trowbridge Park) - 4,508 (instead of 4,681)

Whilst Divisions 82 and 85 still show good electoral equality in 2024 with the corrected figures, Division 75 (Southwick) does not (Variance -12%).

Hence it is still necessary to sort out the discrepancies in the electorate figures for dividing the parish of North Bradley into wards to demonstrate how it assists in *Improving electoral equality* (see [4] of the LGBCE Report). The unsatisfactory methodology used for the forecast 2024 electorates is at the root of this problem (see my previous comments sent Thu 14/02/2019 16:16 and Sat 09/03/2019 16:31).

Kind regards,

[REDACTED]

From: [REDACTED]

Sent: 01 April 2019 14:39

[REDACTED]

Subject: RE: Wiltshire electoral review (Ref: 15520) - Draft recommendations - Feb 2019

[REDACTED]

Thank you for your message.

The baseline figure for electors in North Bradley was 1426. The forecast was 3801.

For the baseline electorate for our proposed divisions, we counted entries from the register and made a marginal adjustment to reconcile the difference between the electors on the register and the figures in the spreadsheet.

In this way, we calculated the baseline electorates as

GC1	1426
Southwick	1316
Trowbridge Drynham	107
Trowbridge Park	3

To get the forecast electorate, we added to these figures we added electors in developments of which we were aware, 1462 in Trowbridge Park and 541 in Trowbridge Drynham. These totalled 2003 electors. This was 372 fewer than the total forecast change for polling district GC1. We apportioned that difference to the sum of baseline electors and those forecast in new developments.

This resulted in a forecast of

GC1	3801
Southwick	1458
Trowbridge Drynham	719
Trowbridge Park	1624

I hope that this explains our mathematics, but please come back to me if you require further information.

Regards

David Owen
Review Officer
Local Government Boundary Commission for England
1st Floor, Windsor House 50 Victoria Street London SW1H 0TL
David.owen@lgbce.org.uk Tel: 0330 500 1277 www.lgbce.org.

[REDACTED]
Sent: 01 April 2019 15:25

[REDACTED]
Subject: Wiltshire electoral review (Ref: 15520) - Draft recommendations - Feb 2019

Dear Mr Owen,

Thank you for your e-mail today and the revised spreadsheet attached.

The forecast electorate for your proposed White Horse and Park wards of the parish of North Bradley together appears to be correspondingly reduced by 430 to 2,343 in 2024, but I am still unable to reconcile the figures for your Trowbridge Drynham and Trowbridge Park Divisions in either 2018 or 2024.

Please advise.

Kind regards,

[REDACTED]

From: Owen, David <david.owen@lgbce.org.uk>

Sent: 01 April 2019 08:41

To [REDACTED]

Subject: Wiltshire electoral review

Dear [REDACTED]

Thank you for your message of 26 March. Following the Council's initial preparation of electorate forecasts, there have been a couple of revisions to reflect emerging information about expected development.

I am attaching a spreadsheet to show the forecasts that have been used in the preparation of draft recommendations

I am arranging for the revised table to be shown on our website.

Regards

David Owen

Review Officer

Local Government Boundary Commission for England

1st Floor, Windsor House 50 Victoria Street London SW1H 0TL

David.owen@lgbce.org.uk Tel: 0330 500 1277 www.lgbce.org.uk

Dear Senior Democratic Services Officer,

Attachment below of my e-mails sent Thu 14/02/2019 16:16 and Sat 09/03/2019 16:31 on the 2024 Electorate of Wiltshire figures.

Yours sincerely,

[REDACTED]

[REDACTED]
Sent: 09 March 2019 16:31

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
Subject: Wiltshire Electoral review (Ref. No. 15520) - Draft recommendations on the new electoral arrangements for Wiltshire Council - February 2019 -

Dear Senior Democratic Services Officer,

Thank you for your e-mail below sent Tue 05/03/2019 12:56.

I have now tracked down the Office for National Statistics' current population projections for Wiltshire (Subnational population projections for England: 2016-based - released 24 May 2018), which estimate its population in mid 2016 at 492,240 and project its population in mid 2018 at 498,500 and in mid 2024 at 520,044, an increase of 4.32% over the six years to mid 2024.

Applying the same rate to the electoral figures, I compute an updated figure of 383,576 for the mid 2024 Electorate of Wiltshire, an increase of 15,890 over the current figure of 367,686 (see [21]).

That is less than a third of the increase of 49,562 arrived at by the Wiltshire Council methodology.

My comments on the Council's response below are therefore:-

"the methodology was likely to include an element of double counting" materially understates the position - it more than triple counts the increases throughout.

"the projected figures were the best available at the time the forecasts were made" is demonstrably incorrect.

"the Commission would, in the absence of any methodological projection, simply apply a flat %increase" would I think mean that the five year forecast figures would give exactly the same outcome as the current figures, and whilst imperfect, would overall, I believe, give a

more reliable outcome than relying exclusively (as the LGBCE's Report does) on the flawed five year forecast figures thrown up by the Wiltshire Council methodology.

Kind regards,

[REDACTED]

From: Elliott, Kieran <Kieran.Elliott@wiltshire.gov.uk>

Sent: 05 March 2019 12:56

[REDACTED]

Subject: Electoral Review

[REDACTED]

Following last week's Electoral Review Committee meeting I can confirm that your representation, along with all others received, has been circulated to all members of the Committee for them to consider ahead of the meeting on 11 March. The Chairman has asked I send you the response below as he stated would be forthcoming at the meeting.

Thank you for your representation in relation to the methodology used to forecast future electorates for use in this electoral review.

Following examination of methodologies used by other authorities for their own electoral reviews which were accepted by the LGBCE, the Electoral Review Committee considered proposed methodologies at its public committee meeting on 11 January 2018. It was acknowledged at that point, and in the submission the Council made for the preliminary stage of the review which was considered at Full Council on 20 February 2018, that the methodology was likely to include an element of double counting. These figures were updated in August 2018 which reduced the predictions for a number of development sites, and adjusted again in September 2018.

Whilst I appreciate that you have serious concerns about the methodology, as you note in your representation the LGBCE were satisfied that the projected figures were the best available at the time the forecasts were made, and the methodology was first made public over a year ago. At this late stage, it is not possible for adjustments to be made to the figures on which the electoral review is to be based. It is also noteworthy that the Commission would, in the absence of any methodological projection, simply apply a flat %increase to all areas of the council without any recognition of different growth in different parts of the Council area.

Your comments that you feel the LGBCE is misapplying the legislation in relation to the current electorate and the five year forecasts would be a matter for the LGBCE to respond to, and I note you have included your representation to them.

Yours

Kieran Elliott

Senior Democratic Services Officer Legal and Democratic Services
County Hall Bythesea Road Trowbridge BA14 9JG
01225 718504

[REDACTED]
Sent: Thu 14/02/2019 16:16
[REDACTED]

Subject: Briefing Note 19-003 - Electoral Review of Wiltshire Council - Draft Recommendations of the Local Government Boundary Commission for England

Hi Electoral Review Committee,

I am disappointed with the LGBCE's draft recommendations at [19] to [22] (Analysis and draft recommendations) and [24] to [26] (Electoral figures) of its Report published on Tuesday 5 February 2019, which include the two completely contradictory statements that "we consider it desirable to use the best forecasting information available" and "the projected figures were the best available at the time the forecasts were made" (see at [25]).

My concerns about the shortcomings of Wiltshire Council's methodology for forecasting future electorates are of longstanding and well known, and it remains my view that they were the principal cause of the errors made in the previous review which drove the decision to carry out the current review.

In my opinion, using the same methodology again simply ensures that the outcome of the current review will be no better than the last.

The problem is compounded by the very unsatisfactory policy/practice of the LGBCE to apply the legislation referred to in [19] as if it applies only to the five year forecast figures, rather than to both the current figures and the five year forecast figures.

As Appendix A of the Report demonstrates, the result of this misapplication of the legislation is that over a third of the proposed divisions do not meet the requirement for "good electoral equality" in 2018 (see [22] and [172]), which ironically is significantly worse than the existing divisions.

The Report states that the Electorate of Wiltshire will rise from 367,686 in 2018 to 417,248 at 2 July 2024 (see at [21]), an increase of 13.48% over 6 years, and an average of 2.13% pa.

There is no credible explanation given for such a huge rate of increase over that period. The projected population increase over the Plan period (2006-2026) in the Wiltshire Core Strategy is only a fraction of that figure (see [5.4] of Topic Paper 2 - Housing). From the Census figures in 2001 and 2011, I compute Wiltshire's population at the start of the Plan period at 451,405, so the stated increase of 65,208 gives a figure of 516,613 at the end of the Plan period. The increase from the 2011 Census figure of 470,981 is 9.69% over 15 years, and an average of just under 0.62% pa.

Applying the same rate to the electoral figures, I compute a figure of only 381,542 for the 2024 Electorate of Wiltshire, which is 35,706 less than that stated in the LGBCE Report (see [21]).

The impact of this overall misstatement will probably be greatest in the proposed divisions with the smallest electorates in 2018 and/or the greatest increases shown in the period 2018-2024. The three smallest proposed divisions in 2018 are 22. (Chippenham Monkton - 2,260), 64. (Salisbury Bemerton Heath - 2,312) and 21. (Chippenham Lowden & Rowden - 2,527). The three with the greatest increases are 64. (Salisbury Bemerton Heath - 1,853), 85. (Trowbridge Park - 1,794) and 22. (Chippenham Monkton - 1,723). However, there are another 8 proposed divisions with forecast increases of over 1,000.

Kind regards,

[Redacted]

[Redacted]

From: Democratic and Member Services <Committee@wiltshire.gov.uk>

Sent: 12 February 2019 16:00

Subject: Briefing Note 19-003 - Electoral Review of Wiltshire Council - Draft Recommendations of the Local Government Boundary Commission for England

Dear All

Please find attached a copy of Briefing Note no. 19-003. This briefing note draws attention to the publication of the draft recommendations of the Local Government Boundary Commission for England for a pattern of electoral divisions for Wiltshire Council to apply from 2021, with associated adjustments to some town and parish council warding arrangements. A consultation runs until 15 April.

Note: this Briefing Note has/ has not been circulated to Parish and Town Clerks at the request of the author.

Towns and parishes are encouraged to comment on the proposals directly to the Local Government Boundary Commission for England, and the Electoral Review Committee would be happy to receive any comments as well.

Democratic Services Legal & Democratic
committee@wiltshire.gov.uk Web: www.wiltshire.gov.uk

Item 35

From: [REDACTED]

Sent: 24 July 2020 11:41

To: [REDACTED]

Subject: Proposed boundary changes in North Bradley

Good morning. I am writing to express my astonishment at the proposed changes to the boundaries of North Bradley. It has had its present shape since 1894 and the areas suggested to be transferred to Trowbridge Town Council means we would not have the status of a village. It seems ludicrous that the Baptist church would be in a different ward from its graveyard! We have lived in the village for 37 years and been involved in many village organisations and activities. We were supposed to vote for or against the changes during lockdown but have had no indication when this will take place. In the meantime a meeting has been arranged for September to make a decision without a chance for villagers to make their feelings known. I am hoping the village will have a chance to vote in the near future.

[REDACTED]

From: [REDACTED]
Sent: 28 July 2020 12:25
To: CGR <CGR@wiltshire.gov.uk>
Subject: North Bradley Neighbourhood Planning (query)

Greetings

I emailed neighbourhood.planning yesterday and today received a reply from Karin Elder, the Clerk to the North Bradley Parish Council, who had been forwarded the email. She suggested that I email you therefore I have copied my email content from yesterday and her response.

My email:

I am somewhat confused and concerned over the proposed boundary change to the North Bradley Parish Council.

I could be wrong but it looks like North Bradley Baptist Church remains in the NB Parish Council while our graveyard and part of the access road to the graveyard would be in the Trowbridge Council area.

Surely that would not be correct as that would make absolutely no sense whatsoever?

NBPC response:

Hello [REDACTED], Wiltshire Council have forwarded me your email that you sent to Neighbourhood Planning as this is to do with Wiltshire Council's recommendations to alter the boundary. Yes, I believe you are correct in thinking that the graveyard would be in a different parish under these proposals.

Here is the section in the Parish Council response:

Residents wish to preserve the rural integrity of their village now and in the future. In addition, the graveyard for North Bradley's Baptist church has been included within the urban development separating it from its Baptist Church which remains in North Bradley village. This will be impractical to administer.

It would appear from her response that the NB Parish Council also believe that separating the graveyard from the church would not be a good idea!

Also, another of my fellow Deacons raised the question of who would be responsible for emptying the Dog Mess Bin near the entrance to the graveyard?

So, to recap, there are two queries/concerns.

1. The discrepancy with the boundary of the Church and its graveyard.
2. The responsibility of emptying the dog poo bin.

Thank you for your consideration.

Kind regards

[REDACTED]

Deacon

North Bradley Baptist Church