Application Ref: 14/12109/OUT

Proposal: Development of up to 98 dwellings with associated landscaping and open space.

At: Land off Melksham Road, Holt.
Assigned Officer: Ruaridh O'Donoghue

Holt Parish Council considered the above application at a meeting held on 22 January 2015 and wishes to object for the reasons set out below.

- The case for this development centres on the assertion that the Wiltshire Core Strategy (WCS) has failed
  to identify sufficient new housing to meet demand in the next 5 years in the Bradford on Avon
  Community Area. The shortfall is stated as 74. This number can be more than met by the development
  of the brownfield Area of Opportunity in Holt (the Tannery) which is designated for development in the
  WCS.
- 2. The WCS (CP2) maintains that development outside settlement boundaries of large villages such as Holt should be determined by Site Allocations DPD or Neighbourhood Plans. The proposed site is not identified in a Site Allocations DPD. The draft Holt Neighbourhood Plan (HNP) is clear on this matter in its overall vision:
  - a. "A village with the same settlement boundary as today, surrounded by green spaces and farmland as well as preserving the existing green spaces within the village.
  - b. Within this boundary, a moderately enlarged population housed mainly by the development of brownfield sites and specifically avoiding building new infill or on green field sites."
- 3. Paragraph 6.4.4 of the Gladman Planning Statement calls up the final inspector's report of the WCS. It quotes the inspector as follows: "it cannot be argued with great strength that the settlement boundaries contained therein are up to date for the purposes of the CS plan period. Indeed, the Council concedes in Topic Paper 3 'Settlement Strategy' that whilst existing boundaries offer protection to the countryside and guard against urban sprawl/ribbon development they are out of date, do not reflect current urban form and require review and updating". The document then repeatedly states specifically that the Holt settlement boundary is out of date and of little weight which is not what the inspector said. In fact, the boundary review has started and as yet has not proposed any significant change. Holt Parish Council believes that this proposal constitutes ribbon development which the settlement boundary should protect against.
- 4. The proposal asserts that the HNP is embryonic and carries little weight. It is in fact in Final Draft prior to going to the Planning Inspector. It further asserts that the Housing section of the HNP is not evidence based when it clearly uses the same evidence as the proposal i.e. the Housing Needs Survey conducted in February 2012.
- 5. The Gladman proposal is to provide approximately 98 homes of which 40 will be affordable. The proposal uses the Housing Needs Survey of 2012 to justify the need for 40 affordable homes. The survey indicated a need for approximately 16 affordable units. A group of 12 affordable houses has since been developed and occupied on an exception site in the village (Star Ground). This is not mentioned in the

Gladman documents. It is anticipated that the balance of the requirement will be met by the Tannery development. CP43 of the WCS is clear that the provision of affordable housing should take into account evidence of local need. There is therefore no justified need for the provision of 40 more affordable units in Holt.

- 6. It is widely recognised that Holt has a significant traffic problem on the B3107 which carries in excess of 10000 vehicles per day. Narrow streets with narrow pavements and low or non-existent kerbs that are frequently over-run by HGVs add up to significant pedestrian intimidation. Residents of the proposed development are more likely to drive the 1200m to local amenities rather than walk or cycle. This will further add to the traffic and parking problems in the centre of the village.
- 7. In the past 10 years 54 new dwellings have been built within the settlement boundary of Holt and 2 more have permission but are yet to be built. Twelve new affordable homes have been built on an exception site adjacent to the boundary. Approximately 80 more new dwellings including affordable units are planned on the brownfield site at The Tannery.
- 8. In summary, Holt Parish Council believe that this proposed development constitutes an unbalanced level of growth and oversupply of both commercial and affordable housing for a settlement of this size. The HNP adequately addresses the housing and commercial growth requirements of the village negating the need to bring forward ribbon development in an unplanned manner.