

HOLT NEIGHBOURHOOD PLAN RESPONSE TO GLADMAN APPEAL

APP/Y3940/W/15/3063775

In their Appeal document, the developers Gladman make several very specific references to the Holt Neighbourhood Plan. Many of these are out-of-date or inaccurate and we respond to their assertions below.

1. STATUS OF HOLT NEIGHBOURHOOD PLAN

Quotation from Appeal document

Emerging Holt Neighbourhood Plan

XXIX. Holt Parish Council are currently producing a Neighbourhood Plan. On the 22nd May 2013, Holt was granted Neighbourhood Area status by Wiltshire Council. The first draft of the Neighbourhood Plan (HNP) was circulated to the local community for comments and feedback in May 2014. Since the initial consultation, work has been progressing on shaping the Plan for the formal consultation process.

Response

This is an out-of-date summary. The current status of the Plan is that the final draft has been formally adopted by the Parish Council and submitted to Wiltshire Council for final consultation and examination. This has happened since our initial response to the planning application in February 2015. The Draft 1.5 circulated in May 2014 was for Regulation 14 Consultation – see below for details of this.

2. REGULATION 14 CONSULTATION

Quotation from Appeal document

XXX. In April 2015 a Draft Version 3.2 of the HNP was published on the Parish Council's website, along with Wiltshire Council's adopted Strategic Environment Assessment (SEA) Screening Decision, confirming that the emerging Plan does not need to be supported by a full SEA. The Plan is however yet to go through any formal consultation (e.g. Regulation 14).

Response

Draft 1.5 of the Plan went through its Regulation 14 consultation in May-June 2014. This was as follows:

1. The Regulation 14 Consultation took place between 12 May 2014 and 30 June 2014, which was the original date for receipt of comments but we did accept the few that came in after this.
2. A copy of the Plan Draft 1.5* was delivered to all households, organisations and businesses in the village by mid-May. It was posted on the village website on 12 May.
3. This included (on the inside cover) an invitation to respond which explained the process and deadline.
4. Articles appeared in the May* and June* editions of the village magazine about the consultation and there were posters* around the village publicising this.
5. There was a whole day public display and consultation event with feedback forms* to complete in the Village Hall on 31 May.
6. There was a second public consultation event with a display and feedback forms at the Holt Music Festival on 7 June.
7. Feedback forms were also sent out to individuals who had expressed an interest earlier in the process or who requested them. We also accepted written and email submissions.
8. The Draft Plan was sent to our neighbouring villages and towns - Bradford, Broughton Gifford, Staverton, Hilperton, Atworth, South Wraxall, and Trowbridge. A copy was sent to our councillor Trevor Carbin and to Wiltshire Council via Geoff Winslow in the Planning Department.
9. Over 100 individuals responded to this consultation and all the feedback* has been published on the website, including responses from the Steering Group*.
10. We did not consult any other statutory bodies at this stage as we did not believe that the proposals in the draft Plan directly affected them.

*Copies of all these documents have been posted on the Holt village website:

<http://holtparishcouncil.gov.uk/> and key ones have been supplied to the Appeal.

3. PROVISION FOR NEW HOUSING IN HNP DRAFT 1.5

Quotation from Appeal document

XXXI. The Plan includes the redevelopment of the Tannery site as the only allocation for housing. It focuses on delivering a mixed-use development of 50% commercial and 50% housing. Residential development outside of the settlement boundary, on greenfield sites, will be generally restricted.

Response

In both Drafts 1.5 and the final Draft, the Tannery site is identified as the main site for new housing, although a smaller site, Star Ground, is also identified as a possible site for additional affordable housing.

Draft 1.5 of the Plan included the following statements on development outside the village boundary and new housing provision:

Quotations from Draft 1.5 of Holt Neighbourhood Plan

A Vision for Holt

This is what we want for the future:

- A village with the same boundaries as today, surrounded by green spaces and farmland.
- Within those boundaries, a moderately enlarged population housed on brownfield sites rather than infill building or on greenfield sites.

Housing

Objective H3: Refuse new housing on greenfield sites

H3.1 There is a general presumption against new greenfield development for housing. The village wishes to retain existing green spaces as amenities, is concerned about creeping expansion beyond the current village envelope as well as the impact this would have on infrastructure. It also believes that adequate new housing can be delivered on existing brownfield sites.

During the Regulation 14 consultation on this draft we received written feedback from over 100 individuals within the village. The feedback forms for the consultation offered respondents three options for each key statement in the Draft: Keep, Amend or Drop. There was also open-ended space to add any comments.

There were 65 feedback forms returned on the **Vision** section of the Plan.

On the statement 'A village with the same boundaries as today, surrounded by green spaces and farmland' 48 respondents said Keep, 9 Amend and none Drop.

On the statement 'Within those boundaries, a moderately enlarged population housed on brownfield sites rather than infill building or on greenfield sites' 45 respondents said Keep, 7 Amend and 1 Drop.

Two specific suggestions were made:

- "An extension of the built-up boundaries by increasing the length 'built-up' especially towards Forwards Common would decrease the attractiveness of the route for through traffic and would potentially reduce the approach speed."
- "'A moderately enlarged population' – could be housed on brownfield sites but even the Tannery is contaminated. So I think the village may have to accept some boundary change."

There was no suggestion that the settlement boundary should be extended to the east.

There were 62 feedback forms returned on the **Housing** section of the Plan.

On the draft policy H3.1 'There is a general presumption against new greenfield development for housing' 52 respondents said Keep, 1 Amend and 3 Drop.

One specific suggestion was made:

- "Extension of the built-up length of the main road may, exceptionally bring benefits."

There was no comment advocating building on greenfield sites.

All the feedback plus the response of the Steering Group was posted on the village website in July 2014 and publicised via articles in the village magazine.

4. PROVISION FOR NEW HOUSING IN HNP FINAL DRAFT

Quotation from Appeal document

XXXII. Paragraph 216 of the Framework confirms that weight may also be given to relevant policies in the emerging plans according to the stage of the plan's preparation (the more advanced, the greater the weight that may be given), the extent to which there are unresolved objections and the degree of consistency with policies in the Framework.

Response

In the light of the very consistent and supportive response to the Regulation 14 consultation on Draft 1.5 of the Plan, the policies on the retention of the settlement boundary and the avoidance of building housing on greenfield sites were kept in the final draft of the Plan. The wording was revised and tightened-up but the essence is the same. This draft has now been adopted by the Parish Council. This states:

Quotations from Final Draft of Holt Neighbourhood Plan

A Vision for Holt

The parish will remain largely as it is today, with farmland and woods surrounding the thriving village. The village will have the same settlement boundary* as now and will preserve the green spaces within that boundary.

*The term "village settlement boundary" is to be read in the light of adopted Wiltshire Core Strategy and, specifically, Core Policies 1 and 2. The "village settlement boundary" is therefore to be considered, for the purposes of decision making, as being synonymous with the currently defined 'Limits of Development' for Holt set out on the Policies Map for the Core Strategy.

Housing Objective 3

Ensure that the current village settlement boundary and existing green spaces within it are protected.

Policy H3.2: This Plan does not support new housing on greenfield sites because:

- a) the village values its rural setting in farmland and other green space around it;
- b) the village wishes to retain the existing settlement boundary and green spaces within this as amenities. It believes that adequate new housing can be delivered on existing brownfield sites; and
- c) the only exception to this which may be considered is the provision of additional affordable housing on the site at Star Ground off Station Road – see above.

5. WEIGHT TO BE ATTACHED TO HNP

Quotation from Appeal document

XXXIII. The Emerging Holt Neighbourhood Plan and associated evidence base are yet to through any formal consultation, are subject to considerable objection and have not been tested through Examination. Currently, the emerging HNP can only be attributed limited weight and its policies should not be regarded as decisive in terms of decision making.

Response

Holt Neighbourhood Plan has over the past five years been through extensive informal and formal public consultation, including for Regulation 14. During this process it has not been 'subject to considerable objection' but has broadly been endorsed by the village. Where specific suggestions for amendment or improvement have been made, these have been taken on board. It has now been formally adopted by the

Parish Council who believes it to be an accurate expression of the wishes of the village for the future development of Holt. It has been submitted to Wiltshire Council who will take it through the final stages of the adoption process and examination, and should still be given weight in this appeal.

6. SUPPORT FOR NEW DEVELOPMENT IN HNP

Finally, we would like to reiterate that Holt Neighbourhood Plan is not opposed to new development, including housing, within the village. It supports the major new development being proposed for the brownfield site known as The Tannery. Plans for this are for a mixed commercial and residential development, with 60+ new houses, including affordable homes. A planning application for this site is due to be submitted in the next month and the developers have worked closely with the village throughout the process. We believe this will be a sustainable development that will enhance the village as well as making a significant contribution to the overall housing requirement within Wiltshire.

Holt is not opposed to development, just to insensitive and unsustainable proposals which take no account of local needs and preferences and which have not engaged with the community in any meaningful way.

DOCUMENTS ATTACHED (IN TRIPLICATE)

1. Holt Neighbourhood Plan Draft 1.5 Used for Regulation 14 Consultation
2. Holt Neighbourhood Plan Final Draft Submitted to Wiltshire Council
3. Articles for Village Magazine Publicising Regulation 14 Consultation x 2
4. Poster Publicising Regulation 14 Consultation
5. Blank Feedback Forms and letter for Regulation 14 Consultation
6. Summary of Completed Feedback Forms for Regulation 14 Consultation for Vision & Housing Sections of HNP
7. Summary of Completed Feedback Forms plus Steering Group Commentary for Regulation 14 Consultation for Vision & Housing Sections of HNP