

**Land off Melksham Road, Great Parks, Holt, BA14 6QP.  
Approval of Reserved Matters (appearance, landscaping, layout and scale)  
pursuant to outline planning permission PL/2022/03315**

**Holt Parish Council has reviewed the revised scheme submitted by the Applicant on 6 September 2024. Holt Parish Council discussed the revised scheme at its meeting on 19 September 2024 and determined to object as follows.**

### **Executive Summary of objections**

The revised scheme does not go far enough to minimise or mitigate the harms to the landscape and character in terms of the expectation set by the indicative layout considered by the Inspector at the outline stage. Holt Parish Council recognise Bewley Homes have satisfactorily addressed objection 1 from our initial comments. We recognise their attempts to maintain a green outlook for the existing residents of Great Parks. We note the reinstatement of areas of play on the way (for very young children) around the new footpath, even though it still ends at a car park. We also note the material changes made by the Applicant from red brick to reconstituted stone and the mix of roof tiles dependant on the house location.

However, many matters of objection remain as Bewley Homes have not satisfactorily engaged in enough change. The revised scheme still has substantially and materially departed from the approval of the outline scheme at appeal causing unacceptable harm to the character, beauty and appearance of Holt and its rural countryside setting.

This objection by Holt Parish Council should also be read in conjunction with our initial objection (July 2024) as Bewley Homes have not made a satisfactory attempt to improve their Reserved Matters application PL/2024/04625. Many of our objections remain with reference to NPPF, Wiltshire Core Strategy and the Made Holt Neighbourhood Plan.

We include a substantial new objection to start with all further HPC objections listed below and enlarged upon in the following sections:

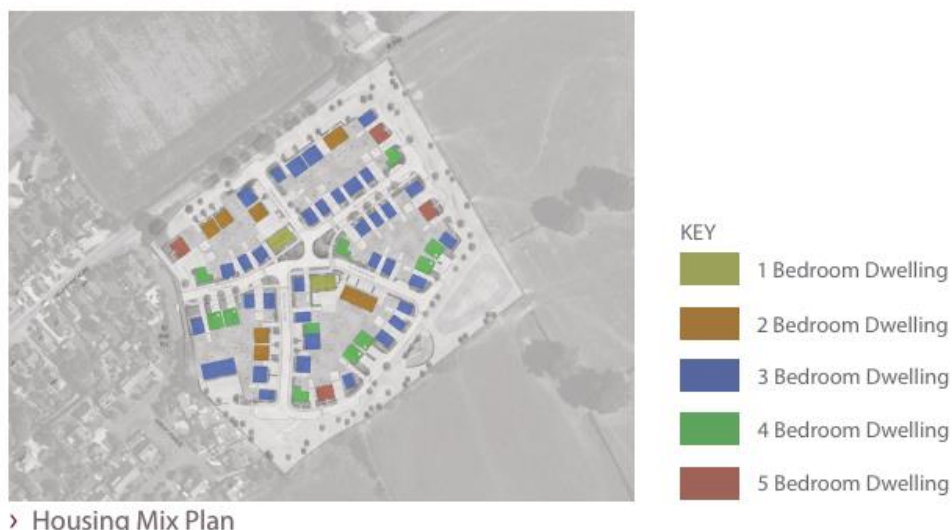
- (i) Mischaracterisation of housing mix by Applicant
- (ii) Excessive Density
- (iii) Visual impact of development to the eastern gateway to Holt – harm to views from Melksham Road
- (iv) Height and Massing: Three storey apartment blocks
- (v) Central Amenity Space
- (vi) Other Amenity spaces
- (vii) Character, Appearance and Materials
- (viii) Homes for All; Differentiation of Affordable Housing
- (ix) Ecology and Biodiversity
- (x) Sustainable Energy
- (xi) Excessive density
- (xii) Noise
- (xiii) Poor Quality of Submission

## Areas of Objection

### 1. Mischaracterisation of housing mix by Applicant

Holt Parish Council have noticed that Bewley Homes mischaracterise the size of 24 of the homes in their documentation.

Bewley Homes Design Compliance Statement, p.19, 3.3.1



4-bedroom homes mischaracterised as 3-bedroom homes.

*Chilworth type*; Plot 4, 29, 40, 45, 61, 73

*Godstone type*; Plot 3, 5, 42

*Longstock type*; Plot 28, 36, 37, 39, 46, 72, 86, 90

3-bedroom homes mischaracterised as a 2-bedroom home.

*Highclere type*; Plots 14, 31, 32, 65, 66, 80, 81

It is clear that the Applicant consistently markets and sells these homes with all upstairs rooms as bedrooms. The Applicant has not altered the architectural plans for the Holt site from ones found on their marketing website. Floor plans have been edited to remove a bed and insert a desk. The 24 homes misrepresented with a study should be considered as a bedroom regardless of what furniture Bewley Homes draw in it. In our view this is a deliberate mischaracterisation of the size of homes, and the Applicant should not deceive consultees.

We are concerned that Bewley is being disingenuous in concealing the over-development of the site with a significantly higher level of urban development by proposing 10 more 4 and 5-bedroom houses than at outline/agreed at appeal. This will also increase the number of vehicle movements to and from the site as compared to the travel plans reviewed at the appeal. There needs to be a reduction in the amount of 4+ bed housing allowed to be built on the site to bring the reserved matters scheme back in line with outline plans.

Outline Scheme	Bewley, Revised Scheme - using the correct number of bedrooms
6 x 1 bedroom	12 x 1 bedroom
24 x 2 bedroom	18 x 2 bedroom
38 x 3 bedroom	28 x 3 bedroom
22 x 4 bedrooms	28 x 4 bedroom
0 x 5 bedrooms	4 x 5 bedrooms
Total bedroom capacity 256	Total bedroom capacity 266
Total no. of 4+ bed houses = 22	Total no. of 4+ bed houses = 32

HPC considers this issue to both be a regrettable lack of probity by the Applicant, but also significant in assessing the density of the scheme, see objection no.2.

In addition, this misrepresentation was not noticed by any consultee with the initial reserved matters application. HPC alerted the Case Officer to this prior to our full objection to PL2024/04625. Bewley Homes have demonstrated that they need to be treated with extreme caution, and we hope Wiltshire Council will address their reserved matters application firmly.

### **Suggested Resolution**

HPC would like all Wiltshire Council consultees to investigate what else may have gone under the radar with PL/2024/04625. HPC respectfully request Bewley Homes to be transparent and honest with the plans for Land Off Melksham Road, Holt.

For the next full set of correct revised planning documents, we request a time extension to the standard 21 days for all consultees. The Planning Officer will then be able to refuse or approve, safe in the knowledge a deep dive has been taken into each and every single document and image presented by Bewley Homes.

### **ii Excessive Density**

The Applicant is proposing to build 4 and 5 bed private homes facing the rural open countryside whilst packing denser areas of (mostly affordable) homes along the visible entrance to Holt on the Melksham Road, in the centre of the development and on the secondary streets.

The increase in the number of 4+ bedroom homes proposed by the Applicant will give the village a harder urbanised edge, particularly along Melksham Road. Accommodating 10 more 4 and 5-bedroom homes, with associated large gardens, driveways for parking spaces and double garages, has increased the residential density of the site and decreased the open space.

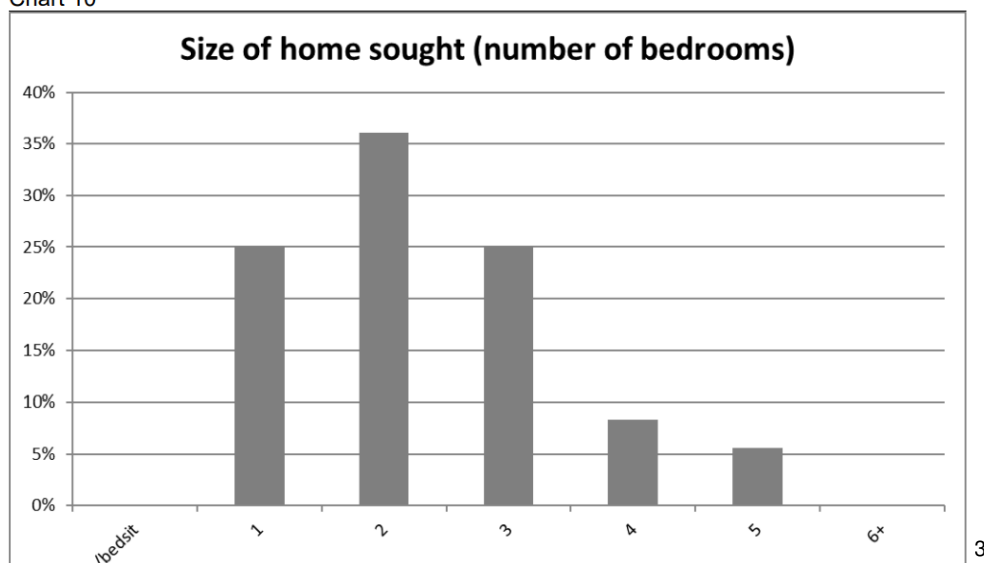
The mix of housing is significant and needs to be addressed. It should reflect Wiltshire Core Strategy Policy 45<sup>1</sup> and Holt's Parish Housing Needs Survey, 2020, alongside the numbers agreed at outline and appeal, with the mix for affordable housing<sup>2</sup>.

<sup>1</sup> New housing, both market and affordable, must be well designed to address local housing need incorporating a range of different types, tenures and sizes of homes to create mixed and balanced communities.

<sup>2</sup> 1 bed = 12, 2 bed = 18, 3 bed = 38, 4 bed = 22.

In terms of size, the most popular option was for two bedroom homes and respondents also expressed a need for properties with one, three, four and five bedrooms. No need was declared for studio (bedsit) or homes with six or more bedrooms:

Chart 10



This mix of 2 – 3 beds would be more equitable, with the parking landscape shown in the outline plans and more aligned with the character and appearance of our rural village with driveways and parking not dominating the frontage, contrary to WDG 5.4.4<sup>4</sup>

The outline plans with 2.43 residential hectares and 1.27 open space were considered harmful to the landscape at appeal. Bewley plans are more harmful to the landscape with 2.64 residential hectares and only 1.06ha for open space. This escalation in built form will exacerbate the harmful impact of the development on the landscape and character of our rural village.

### Suggested Resolution

No more than 22 x 4+ bed properties to reduce the housing density.

#### iii. Visual impact of development to the eastern gateway to Holt – harm to views from Melksham Road

The following comments are in addition to our initial objection (iii) submitted on 25<sup>th</sup> July 2024 and should be read in conjunction with them.

This revised scheme does not provide any attempt to design an attractive, soft gateway entrance to Holt as a rural village and will significantly increase the harmful visual impact of the development from the proposals considered by the Inspector at Appeal. This is not the “*softer, more feathered edge to the village*” or improved village gateway which was originally proposed and considered.

This urbanised frontage of 15 houses in a continuous building line with the majority of plots facing Melksham Road with parking spaces rather than front gardens and no low stone walls is unacceptable. There have only been 2 properties taken away from the Melksham Road in the revised Bewley plans and moved to the adjoining

<sup>3</sup> Parish Housing Needs Survey, November 2020

<sup>4</sup> on plot parking should not dominate the front elevation of the dwelling.

secondary street negating any improvements in one area by making this street more urban and dominated by parking.

It is our priority to ensure housing along main frontages, gateways and junctions have enhanced treatments. Enhanced treatments in these key visual areas should be natural Bath stone and clay brick. The Holt Character Statement demonstrates the importance of these materials, and the use of larger front gardens and low-rise stone walls, particularly ones made from natural dry stone in a “cock and hen” style as is characteristic of Holt and in the original DAS.

The significant car parking area along the Melksham Road frontage remains. Parking provision will be visibly dominant along the frontage with 2 visitor spaces and 22 front facing driveway parking spaces<sup>5</sup>. WC Climate Officer called for a layout change to the eastern corner in his initial comments and we can see no change. The affordable houses on this frontage have no front gardens let alone a low stone wall, contrary to the outline scheme’s DAS and WDG 9.3.5.<sup>6</sup> Also see our objection no. 8 and Holt Character Statement p 27 for HPC expectation for affordable homes in Holt. Holt’s affordable homes are not built onto the B3107.

The revised scheme has made this view even worse with the bin collection points detail now being shown in the plans, contrary to WDG 4.5.16.<sup>7</sup> The 2 collection points will be at the forefront and visible as the entrance to the village.



Indicates refuse collection point with concrete slabs below and 0.6m high timber knee rail to perimeter

From Bewley’s Material and Boundaries Treatment Plan

Landscaping is also a significant departure from the outline scheme. We note the WC Landscape Officer (Sept 2024) still requesting improvements. The reduction in the landscape buffer proposals (34 trees to 20), loss of tree-lined footpath around the site, taken together with the removal of front gardens, to be replaced with dominant car parking provision, is a significant harmful material departure from the outline scheme and is unacceptable as our new village gateway.

The revised scheme is too urban in design relative to the original proposals.

## Suggested Resolution

As Bewley made no satisfactory change in this area we will be more explicit this time by suggesting they place private 3-4 bed homes in this area with low stone walls, front gardens and driveways which are characteristic of Holt in this location. Bewley should look at p27 of our Holt Character Statement, investigate options for parking in rural Wiltshire villages and change the parking for the houses on the Melksham Road.

---

<sup>5</sup> WDG 5.4.4 – parking should not reduce amenity space or dominate the front elevation of the dwelling.

<sup>6</sup> Deeper front gardens can be appropriate for establishing a distinctive set-back from particularly busy streets as is characteristic in many neighbourhoods

<sup>7</sup> a bin collection point should be provided on the inside edge of the plot. If that is not possible then a nearby space adjacent to the highway should be provided. Its design should neatly contain bins and containers without the enclosure itself being visually prominent

#### **iv Height and Massing; 2 x Three Storey Apartment Blocks**

The following comments are in addition to our initial objection (ii) submitted on 25<sup>th</sup> July 2024 and should be read in conjunction with them.

Holt Parish Council are concerned that Bewley has retained three storey blocks of flats albeit superficially having the appearance of a 2.5 storey development. We agree with the observations made by the Urban Design Officer that Holt has two storey homes with *“strictly an attic with dormers well set into a roof slope coming down to eaves only just above first floor window head.”* The revised plans do not have this form, they have a wide roof profile (3 storeys high) to increase usable floorspace and a higher ridge height shown in the side elevations drawings. The flat blocks are essentially still 3 storey buildings disguised as 2.5 storeys from the front and rear. (See revised Holt Character Statement, p16.)

It is also worth noting here 2 comments from WC consultees.

1. Urban Design Officer<sup>8</sup>. Bewley Homes have ignored his advice and put forward proposals for 2 x 1 bed flats in the roof space of each block, with no windows for ventilation in the bathrooms, contrary to Wiltshire Design Guide (WDG) 10.2.6.<sup>9</sup> The second floor 1 bed flats would also be contrary to section 9 of the WDG<sup>10</sup> as well as not being equitable to the other 8 x 1 bed flats in their design and space.
2. WC Housing Enabling Team comment on PL2024/054535 opposite the Bewley Homes site is worth noting. “Preference now is for the 1 bed flats to be provided in house style maisonettes (of 2 units each)” If this is the case for one planning application, then it should be the same for every planning application currently being assessed by WC Housing Enabling Team and Planning Officers.

#### **Suggested Resolution**

Maisonette house style for the 1 bed flats or if a block of flats is approved then it is actually a 2.5 storey with 1 attic flat in each block.

#### **v. Central amenity space**

The following comments are in addition to our initial objection (iv) submitted on 25<sup>th</sup> July 2024 and should be read in conjunction with them.

Holt Parish Council strongly objects to the poor design of the central amenity space. The context is a rural village in Wiltshire where the greenery and sense of community are highly valued attributes. The revised scheme still proposes two small grass verges overlooked by 2.5/3 storey high blocks of flats bisected with a road. This is a significantly lower quality design than the original outline plan considered at the appeal. Residents of the affordable flats, who have no private outdoor space,

---

<sup>8</sup> WC Urban Design Comment, 30<sup>th</sup> July 2024, this would suggest that only a small flat wholly within the roof space of each block would be possible not the two flats at a full second storey height proposed in each block. A reduction would help towards addressing visitor parking as there is none shown in proximity to these flats.

<sup>9</sup> Every room within a building should have a window for natural ventilation.

<sup>10</sup> must provide good standard and quality of internal space – room sizes, floor to ceiling heights, daylight and ventilation.”

need amenity space, particularly as with the new 1 x bed flat elevations they now no longer have a patio door to open.<sup>11</sup>

Bewley Homes have removed even more trees from this area. Initial Reserved Matters showed 6 trees in this area and now that is 3, with the 3 removed having been a filter to the front elevation for the block of flats. The primary road had 17 trees and now has 14. The Applicant must pay high regard to WDG section 7<sup>12</sup> and create a central green open space that is both a visual focal point and a community amenity space.

## **Suggested Resolution**

As Bewley made no satisfactory change in this area we will be more explicit this time by suggesting they remove plot 43 and connect it to the grass verge to make this the central green amenity space reminiscent of Ham Green. This should include visually significant architectural and landscape detailing including large trees.

### **vi. Other amenity spaces**

The following comments are in addition to our initial objection (iv) submitted on 25<sup>th</sup> July 2024 and should be read in conjunction with them.

Street tree planting has been significantly reduced in the Bewley Homes scheme where the outline plans emphasised tree lined streets and paths. Bewley Homes must be required to adhere to NPPF 136 and WDG expectations<sup>13</sup>. Trees and landscape make a very strong and unifying contribution to Holt's distinct rural character but for this site, some secondary streets (for affordable housing) are devoid of any trees and soft landscaping. This leads to a hard urbanised character which is completely inappropriate to the edge of village location. The original scheme emphasised homes set within a green infrastructure settling, harmonising with the landscape. The open space has been reduced (1.06ha as opposed to 1.27ha), as has the overall green setting, due to the significant loss of street trees. The reduction of these aspects are significantly harmful to the overall impact of the scheme.

Holt Parish Council wish to ensure better standards for tree planting and locations in line with WC guidance<sup>14</sup>.

Holt Parish Council endorse WC Landscape Officer's September comment. We too believe the southwest corner is viable as a community orchard. We request the Applicant to relocate the pumping station to the position it always has been in, for a successful new community amenity to be established. This would add to the ecology and biodiversity of the site. It is also supported by expectations within the WDG<sup>15</sup>.

---

<sup>11</sup> For apartment blocks (with over 4 homes) communal residents gardens should also be provided based on a minimum area per apartment. .

<sup>12</sup> well-designed public spaces are social spaces, providing meeting places and opportunities for comfort, relaxation and stimulation for all

<sup>13</sup> WDG 6.2.3 Plant more urban trees and tree-lined streets to help counter the urban heat effect and create shade. A tree-lined street is understood to mean a street with regular tree planting along both sides for the entire length of the street. This is expected to equate to approx. 1 tree to every 5-20m

<sup>14</sup> WDG 11.1.5 Tree planting systems should be to BS8545.

<sup>15</sup> 6.7.2 community orchards (minimum 6-8 fruit trees) should be provided within major applications

## Suggested Resolution

The proposals should reinstate a central green space with seating, and footpaths and all streets to be tree lined. Relocate pumping station to original position from outline plans and create an orchard area. Biodiversity net gain should be produced.

### vii. Character, Appearance and Materials

The following comments are in addition to our initial objection (v) submitted on 25<sup>th</sup> July 2024 and should be read in conjunction with them.

The Applicant's proposals do not respond to the architectural character of Holt. It is still proposing the imposition of 90 homes, almost all of which are generic designs, which will have an inappropriate and harmful impact on the character of the village. We urge the Planning Officer to have regard to the Holt Character Statement and the ambition of the Wiltshire Design Guide to hold the developer to higher standards.

Our initial objection focussed on materials and in our executive summary we noted the changes made and now HPC request samples as per WDG recommended design information<sup>16</sup>. There are diverse levels of quality for reconstituted stone. Natural Bath stone should be used on priority housing along main frontages, gateways and junctions with careful consideration for the stone treatment in other areas. There could be an appropriate use of a mix of "ashlar" stone bricks or rubble stone surface to respond to local characteristics. Together with the soft landscape specification, boundary walls and estate railings on road frontages also make a substantial difference. Natural dry stone "cock and hen" walls are a common character in rural Wiltshire as can be seen in the Holt Character statement.<sup>17</sup> There is insufficient detailing of proposed materials to enable Holt Parish Council to fully assess and comment on the suite of proposed building materials. These should be provided prior to any determination of the reserved matters proposals.

There is still improvement to be made on the overall character and appearance of the site which currently is more suited to a town environment. Referring back to objection numbers 1, 2, 5 and 6, Holt is a rural village in Wiltshire and the landscape masterplan with 32 x 4+ bedroom houses will cause harm to the landscape of our countryside. Bewley's selection of the Shalford type, grouped together in pairs, result in an unacceptable domination of parking (4 spaces in a row) dominating the street frontage. We request Bewley change the 6 of these Shalford type homes to another higher quality design with driveway parking. These could be adapted from another "garden village" design such as Chobham, Stanford, Ascot, Chilworth, Longstock, Marlborough, Donnington or Godstone – or a bespoke design to achieve a more acceptable street frontage for the location.

We recommend very substantial alterations to the Reserved Matters Scheme to ensure the design respects and enhances the intrinsic local character, appearance and materials distinctive to Holt.

---

<sup>16</sup> WDG Appendix C – Building plans and elevation drawings – with annotation describing appearance of all items on facades. Photo samples of the main facing materials should be submitted, otherwise a swatch.

<sup>17</sup> Locally quarried stone should be the first choice for walls within the public realm. Within Wiltshire pennant stone is commonly used for paving and cobbles.



## **Suggested Resolution**

The Applicant is required to utilise characteristic natural Bath stone on properties at areas of high visual impact. Change Shalford plots to other 4-bed home designs mentioned above. The scheme should be redesigned to higher architectural standards, to achieve a better-quality design which responds to the distinct character of the village.

### **viii. Homes for All – unacceptable clustering and differentiation of affordable housing**

The following comments are in addition to our initial objection (vi) submitted on 25<sup>th</sup> July 2024 and should be read in conjunction with them.

Holt Parish Council note Bewley Homes have made the situation for affordable homes worse rather than better in these revised plans<sup>18</sup>.

- The design change to 2.5 storey instead of 3 storeys high makes the second-floor flats undesirable with 2 built into the roof, and different in design from the other 4 within the same block.
- No visitor spaces despite increasing the number from 8-18 for the whole site.
- Greenery taken away within the car parks for the 1 bed flats and 3 large trees from the front elevation of a block of flats.
- 2 grass verges remain the only green space near to the flats – this is not a relaxing private area with vehicles bisecting it.
- Issues for parking and electric vehicle charging for plots 20-22 as per Climate Officer comment.<sup>19</sup> There is also a very real concern this will not happen at all in the most recent Climate Officer comment.

Holt Parish Council wishes to ensure that the development delivers homes which do not differentiate between tenure types. We expect affordable homes to be the same standard as privately owned homes in this village with regard to distribution, architecture, parking and landscaping.

HPC have discussed with Bewley Homes that our Star Ground development<sup>20</sup> is a showcase for integrating affordable homes to an exceptional standard of living, built to Passivhaus standards and with parking characteristic of our rural village<sup>21</sup>. We also discussed swapping larger houses from the cluster overlooking the countryside with some of the affordable housing facing Melksham Road to address the issue of differentiation and also to improve the visible gateway to Holt in reflecting what was agreed at appeal.

## **Suggested Resolution**

Affordable homes should be tenure blind in design. Parking situation for all affordable homes needs to be improved and reflect homes in a rural location.

---

<sup>18</sup> WDG 8.3.1 when incorporating different tenures, they must be well-integrated and designed to equal standards of high-quality, in order to create tenure-neutral homes and spaces. This includes distributing affordable homes across the site in small clusters and designing their architecture, their plot and their streets to all be tenure blind.

<sup>19</sup> WDG 9.3.8 any parking close to a habitable window should be allocated to the resident of that home.

<sup>20</sup> Holt Character Statement, Page 27.

<sup>21</sup> WDG 5.4.7 rear parking courtyards may be used and must not be disproportionately used for affordable housing.

## ix Sustainable energy

The following comments are in addition to our initial objection (vii) submitted on 25<sup>th</sup> July 2024 and should be read in conjunction with them.

Holt Parish Council note the “energy and sustainability statement” submitted in August 2024. It is extremely disappointing to read the latest WC Climate Officer’s submission as the word “minimum” is frequently used. We also note his suspicions for electric vehicle charging to all homes.<sup>22</sup>

## Suggested Resolution

There will be electrical vehicle charging to all homes on this site.

## x Ecology and Biodiversity

Holt Parish Council were very disappointed to note that WC Ecologist accepts Bewley Homes initial plans for 22 universal bird bricks. We request the Planning Officer requires Bewley Homes to follow Wiltshire Local Plan, WDG expectations or at the very least the British Standard<sup>23</sup>. We note the 2 hedgehog houses on the revised ecological parameters plan but still cannot see provision for hedgehog highways in property boundaries<sup>24</sup>.

Referring back to HPC objection no. 6. There is an opportunity here for Bewley Homes to improve the south-west corner in support of WC Landscape comments (Sept 2024) <sup>25</sup>to create an orchard area.



## Suggested Resolution

- 1 Create a community orchard.
- 2 Ecological parameters plan must show location of bat roosting features, 180 bird bricks (2 per property) and hedgehog highways in all property boundaries.
- 3 Finally, Bewley Homes must not cut the existing grasses October 2024 – April 2025 to protect the reptiles shown to be on site.

<sup>22</sup> Their plans show EV charging to every home, but I am sceptical that this will be delivered under Part S because this layout and parking layout is going to create cost issues and/or land rights issues and Part S allows exemptions.

<sup>23</sup>Wiltshire Local Plan, Policy 88, states a minimum of 2 per dwelling, WDG 6.6.1 included at a rate of 2 per house and the British Standard (BS42021:2022 guidance has 1 per dwelling.

<sup>24</sup> WDG 6.6.2 Hedgehog highways should be provided in property boundaries. Submitted plans should identify provision of these

<sup>25</sup> WC Landscape Comment (16<sup>th</sup> September 2024) Soft Landscaping Proposal Sheet 2 of 3. Comment pointing to Southwest Corner in proximity to pumping station.

## **xi Noise**

We remain extremely concerned that the Applicant is seeking to discharge the appeal condition relating to a full Noise Assessment as well as not fulfilling appeal conditions 5-8<sup>26</sup>.

Bewley Homes have told Holt Parish Council they will be undertaking a noise assessment when the West Wiltshire Equestrian centre is open. We request they do this when it is running an event and ensure traffic noise at post-covid levels is recorded too. HPC consider the proposal to discharge the appeal condition is inappropriate in this location.

The current outline planning application PL2024/05435 Noise Assessment (June 2024) shows the impact noise will have on houses closest to Melksham Road as well as extra measures needed to be taken in the layout and materials used for these houses<sup>27</sup>. Mechanical ventilation is required too, as bedroom noise levels will exceed standards. This refers back to WC Landscape comment for the Bewley Homes site, that significant tree planting and hedging for boundaries is expected on the Melksham Road.<sup>28</sup>

### **Suggested Resolution**

Bewley Homes must produce a full noise assessment report.

## **xii Poor Quality of submission**

Inaccuracies, missing documents and glaring errors from the different Bewley Homes consultants remain in the revised documents. We have submitted our notes direct to the Planning Officer.

Holt Parish Council discussed with Bewley Homes the following inaccuracy and they were unable to tell us which was the correct version.

- Parking Plan - shows meandering path from the car park on Melksham Road to the existing pavement on Melksham Road
- Landscape Masterplan - shows it as a straight slab of concrete.
- Soft Landscape plan – it doesn't exist at all.

### **Suggested Resolution**

All documents, and images within them, must be consistent and accurate.

## **xiii Conditions**

In discussion with Bewley Homes (Monday 16<sup>th</sup> September) construction access is unclear and they implied it will be via the existing Great Parks entrance until WC Highways approve a change. This site entrance is wholly unsuitable.

---

<sup>26</sup> shall be submitted to the local planning authority for approval with or before the submission of reserved matters

<sup>27</sup> WDG 9.1.13 Principles of good acoustic design followed to ensure noise levels within habitable rooms should be assessed where windows are open for ventilation.

<sup>28</sup> WDG 10.2.6 Every room within a building should have a window for natural ventilation. External shading is preferable to mechanical cooling as it reduces the need for cooling in the first place.

HPC agree with Bewley Homes that a solution is for a new entrance to be created at the Eastern end of the site and for all construction traffic to be mandated to enter and leave from the Melksham end of the village. This would also require the existing 30mph speed limit to be extended towards Melksham beyond the new site entrance. HPC understand Bewley Homes are offering to pay for this to take place and we urge WC Highways to accept this offer and allow the changes to take place as a matter of urgency.

In a further discussion with Bewley Homes we suggested they resurface pavements to and from the site and village amenities<sup>29</sup> to support their sustainable development on the edge of Holt.

## **Conclusion**

This revised application has many grounds for refusal as per our detailed objections and pays scant regard to the Core Strategy, the emerging Wiltshire Local Plan, the made Holt Neighbourhood Plan, the NPPF, and the Wiltshire and National Design Guides. It ignores important matters considered by the Inspector at the appeal.

The proposal with its excessive density, creates an adverse visual impact to the eastern gateway into Holt, and the landscape in general. The design in its present form would detrimentally affect the intrinsic character of Holt as it ignores important matters considered by the Inspector at the appeal.

The disadvantages of the revised scheme would last 100 years or more and the application should be refused.

---

<sup>29</sup> WDG 10.1.2 As a rural county, the largest carbon emitter is transport. Therefore, the design of new developments must take all opportunities to lessen reliance on private cars by making alternative options feasible and appealing, especially for short local trips.