

Poor Quality of Submission.

Holt Parish Council have read all documents provided for this second set of Reserved Matters plans for Land off Melksham Road as a re-consultation. We remain concerned about the inadequate quality of the submission and lack of attention to detail. There is the possibility of confusion with the information as it is presented without date changes on the documents. There are still errors in documents, inaccuracies and a vagueness about what is actually planned to be built. This all affects the ability for us to consult with our villagers and provide comments on the approval of Reserved Matters.

We noted missing documents, and documents Bewley Homes said they had submitted as part of their Reserved Matters Application with their initial reserved matters application. This paperwork has still not been submitted with this second set of plans for the re-consultation.

- Design Compliance Statement 3.12 (R1) – UPOWA smart charge UPEV-SC1-07 sheets
- Eco Note – Reasonable Avoidance Methods Statement (RAMS)
- Landscape – no design details for pumping station or electrical substation.
- Planning Statement – Updated Transport Assessment and Travel Plan
- Planning Statement – Acoustic Report
- Planning Statement – cycling – accompanying technical report.

HPC would like it noted that some documents have not been superseded so there is still an inadequate quality of submission in Bewley Homes “Planning Statement” and “Statement of community engagement.”

HPC would also like to draw attention to the typos and errors in the revised documents, some of which still remain from the original Bewley Homes Reserved Matters application.

We have put the document title, in ABC order, and anything highlighted grey is a typo error, grammar issue or an unfinished sentence.

This is NOT HPC’s comment for PL/2024/04625.

AFFORDABLE HOUSING TENURE PLAN (Noble Consultancy) - REVISED Sept 2024

Details are not included within the Affordable Tenure Plan, but we have used the “All house types pack” and plot numbers on “Landscape master plan” to find that none of the affordable homes feature on the Bewley Homes website (in name or image), or the Bewley Homes dedicated Holt consultation website.

In addition to this we have found that the key on the right does not explain the turquoise circle that appears on some parking spaces for the affordable homes. You have to locate the separate “parking plan” document to find these are the compliant parking spaces.

Rev A but no new date on the document. If there is a Rev B, C, D, etc. how will we know which is the current one to be looking at. We request a date change to documents when there is a new revision.

WC Housing Enabling Team requested floor plans for the adapted units to be provided.

ALL HOUSE TYPES PACK (Noble Consultancy) - REVISED Sept 2024

There are 5 plots without details of their elevations and floor plans within this revised document or as a separate uploaded document.

Plots 14 and 15.

Plots 62, 63 and 64.

Plot 14 = Highclere, Plot 15 = Epsom, Plot 62 = Woolton, Plot 63 = Radley and Plot 64 = Radley.

Plots 62-64 are affordable homes and Plots 14-15 are 2 private dwellings within a cluster of affordable homes.

All front elevations are now coloured throughout the document but no “Rev A” in the right-hand box on each page or a date change. The only date change is the change on the pages where the 3-storey to 2.5-storey flat block elevations and floor plans are shown. This now shows 09/24.

HPC request date changes on documents to ensure no confusion as to which one is the most current.

APPLICATION FORM (RPS Consulting Services Ltd)

Appeal Condition 6 – we cannot see a new acoustic report. We note their covering letter seeking to discharge conditions and their Noise Impact Assessment.

Appeal Condition 7 – we cannot see “details of the improvements and alterations to Great Parks and the B3107”. We can only see the same images from Outline Planning within the Design Compliance Statement.

Appeal Condition 8 – we cannot see “details of the footway improvements on Great Parks, Little Parks and Bradley Lane.” We can only see the same images from Outline Planning within the Design Compliance Statement.

DESIGN COMPLIANCE STATEMENT (Noble Consultancy) - REVISED Sept 2024

There still remains spelling errors and issues, with mixed messages across documentation.

1.1.1 “Planning Appeal APP/Y3940/W/23/3315432 was allowed and Outline Planning Permission (PL/2022/03315) was granted in April 2022 subject to planning conditions.”
Appeal decision was 21st July 2023 not April 2022.

2.1.4 “Tannery Industrial Estate” – there is no “Tannery Industrial Estate” in Holt.

Site Description pages are not up to date –

2.1.6 “currently used for equestrian activities,”

2.1.7 “ an internal hedgerow... is present on the site but has been earmarked for removal.”
Photos on page 09 haven’t changed to show removal of boundary hedging/erection of fencing.

2.2.1 “existing hedge within main body of site to be removed.”

On page 11 the image is updated but not the detail on hedging in the text box.

2.4.3 – “regular updates” – Bewley declined to do a community face to face meeting as part of the pre-application process. Fact – they only met with Great Parks site neighbours as they contacted Bewley first and asked for a meeting.

2.4.4 – last 2 bullet points are not true now as there is a house facing existing properties in Great Parks and the pumping station is closer to the site boundary and existing properties of Great Parks.

3.1.1 – condition 7 and 8 asks for details of the drawings whereas Bewley have just enclosed the same drawings.

3.1.3 – not up to date to reflect revised plans with the relocation of open space to Great Parks.

3.3 Housing mix plan image compared to “all house types” pack and Bewley Homes marketing on their website doesn’t marry up. HPC have raised this as a key objection.

3.3.3 All the affordable dwellings do not feature on the Bewley Homes website for their Garden Village collection or on their dedicated Holt consultation website.

Page 22 – scale and form text has changed to 2.5 storey but not on the key for the image of the proposed building height plan.

Page 28 3.8.2 – what is written doesn’t match the change in documents and the image provided on this page with the key is incorrect. Hard landscaping and Landscape masterplan shows primary street, secondary street and lane as well as smaller section of private drives with one shared surface street. In this image - what is the turquoise street? The green coloured streets are not shared surface on the landscape/hard landscaping plan?

3.12.3 – mentions electric vehicle charging units and specification sheets submitted with this Reserved Matters application. HPC cannot see them included as part of this submission.

3.14.4 – crime prevention strategy says, “under 4 headings”. There are only 3 and a conclusion with an image showing the 4 – “maintenance” is missing.

3.9.5 “All dwellings will be provided with cycle parking, either withing garages or within safe and secure cycle sheds in private rear gardens.” Does this mean Bewley are providing secure cycle sheds in private rear gardens as we can’t see cycle sheds on any images?

3.12.3 In the paragraph about Electric Vehicle charging, they are seeking to discharge Condition 15 – No external lighting shall be installed at the site unless first agreed in writing by the local planning authority. Where is the UPOWA Smart Charge UPEV-SC1-07 specification sheets they mention?

3.14.2 “Conversely, a rushed or poorly though out layout can potentially have the opposite effect though the accidental creation of blind spots and areas for crime to occur.” 2 typos in one sentence.

DRAINAGE TECHNICAL NOTE (Paul Basham Associates) - REVISED Sept 2024

Appeal Condition 5 – we cannot see a timetable for implementation within their “Drainage Technical Note”.

ECOLOGICAL TECHNICAL NOTE (FPCR Environment and Design Ltd) - REVISED Sept 2024

Important to note –

4.8 “in view of the increased likelihood of reptile’s presence on-site the removal of suitable habitat on site should be conducted during the active reptiles’ season (April – October). Process involve 2 cuts following a fingertip search by a suitable experienced ecologist, the first to 200mm and second 1-2 hours later to ground level.”

4.10 – “implementation of a Reasonable Avoidance Methods Statement (RAMS) is recommended for reptiles.” When is this expected to be produced and shared?

EPSOM AND HIGHCLERE ELEVATIONS AND FLOOR PLAN

These are showing as superseded on the planning application WC website but there are no new revised documents for these properties. These are the plots missing from the “House Types Pack” – Plots 14 and 15.

HARD LANDSCAPING PROPOSALS (CSA Environmental) - REVISED Sept 2024

- “Materials and Boundaries Treatment Plan,” “Parking Plan” and “Potential PV Location Plan” it shows a little meandering path from the affordable homes’ car park to the existing Great Parks footpath alongside the Melksham Road. However, on the “Landscape Masterplan” and “Hard Landscaping Plan” it looks like a piece of tarmac slapped onto the edge of the affordable homes’ car park. Then on the “Soft Landscaping Plan” there is no sign of a path at all.

LANDSCAPE MASTERPLAN (CSA Environmental) - REVISED Sept 2024

- Electric substation – Bewley Homes have verbally informed HPC there is a plan to upgrade the existing one in Great Parks. This should be stated to provide clarity for residents.
- Pumping station – what is the size and plan for materials to be used?

MATERIALS AND BOUNDARY TREATMENT PLAN (Noble Consultancy) - REVISED Sept 2024

The information is confusing from what Bewley are presenting in website images compared to the detail on their Reserved Matters plans.

- Nowhere can we find details of style or colour of front doors.
- There are no website images for the affordable housing as houses or 2.5 storey high flats.
- There is no specification detail or examples of actual materials to be used. Urban Design comment requested photos.

NOISE IMPACT ASSESSMENT (RPS)

- Acoustic letter discharging need for Acoustic Report even though it was an appeal condition 6 to do a new acoustic report.

PARKING PLAN - REVISED Sept 2024

Not all driveways or parking spaces are coloured in.

PLANNING STATEMENT (RPS)

- 7.19 “the application is supported by an updated Transport Assessment and a Travel Plan.” We cannot see it submitted as part of PL/2024/04625.

HPC dispute these statements.

- 4.12 “all affordable dwellings will be indistinguishable from market homes” – HPC note they don’t feature on the Bewley Homes website so are already distinguishable. See our objection comment for more detail.
- 7.45/6 Noise = says reserved matters application is supported by acoustic report – but there isn’t a new one which is condition 6 of the appeal. Bewley Homes not compliant to appeal conditions here.

PV CHARGING PLAN (Noble Consultancy) - REVISED Sept 2024

Document shows it is “Rev A2” but only because of new housing layout.

Only says “potential PV location.” 1x5 bed property does not have the roof-coloured yellow which looking at all others it probably should be? So, HPC would like to know all houses will

have solar panels in these positions? Previous DAS statement saying “panels applied to roofs of appropriate orientation” has been removed.

STATEMENT OF COMMUNITY ENGAGEMENT (Turley)

4.17 typo here – 2199 users for website – 219 mentioned in point 1.6.

Section 5 the summary of feedback and applicant response

“ a travel plan has been submitted to support the reserved matters application” – HPC cannot see it online as part of PL/2024/04625.

Cycling – “further details are included in the accompanying technical report” – HPC cannot see an accompanying technical report. Bewley Homes please advise us where to find the further details.

“small-leaved lime tree (NW corner) express to be protected” – is this on the soft landscaping plan?

Parking – “more information can be found in the Transport Assessment submitted as part of the application” – HPC cannot see this document online as part of PL/2024/04625.

Holt Consultation Website has 3 images of Garden Village collection houses and only one is on the Bewley Homes website – Shalford.

STREET SCENES (Noble Consultancy) - REVISED Sept 2024

It is not a true representation of the amount of parking in front of dwellings on Street Scene 1 Melksham Road. Not all street scenes are shown. HPC are interested to see the secondary street scenes and the shared surface street scene.

WALL AND FENCE DETAILS (Noble Consultancy)

The garden of plot 90 shows a close boarded fence going out to rear garden of Great Parks bungalow and another from garden of plot 75 but doesn't show them meeting up as the same colour is used for the application boundary.

Great Parks residents have said Bewley told them they would be putting up fencing for them.

It is not clear on this plan as the whole of their back garden boundaries feature the red line for application boundary.

WOOLTON AND PENWOOD ELEVATIONS

These are showing as superseded on the planning application WC website but there are no new revised documents for these properties which are now a Woolton joined to 2 Radley style homes.

Plots 62,63,64 which are missing from the house types pack need their floor plans and elevations submitted.