

**PL/2024/04625**

**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 discussed this application at its meeting on 18 July 2024  
and determined to object as follows:**

The approved scheme is for erection of development of up to 90 dwellings, including 40% affordable housing with public open space, structural planting and landscaping and sustainable drainage system.

It is an outline permission with all matters except access reserved for subsequent consideration. Any details relating to other matters are illustrative. Conditions relating to the permission did not require the detailed scheme design to be in broad accordance with the illustrative details.

### **Outline Scheme Landscape Evidence and Illustrative Material**

The outline scheme was informed by an illustrative master plan and Design and Access Statement (DAS) and Landscape and Visual Impact Assessment (LVIA) evidence. These documents were referenced at the appeal in assessing the likely level and weight to be attributed to landscape and character harm in reaching the appeal decision and remain material to considering the reserved matters scheme.

It is the responsibility of the applicant to protect or enhance character and landscapes and minimise and mitigate any harm caused by the proposed development.

*“Development should protect, conserve and where possible enhance landscape character and must not have a harmful effect upon landscape character, while any negative impacts must be mitigated as far as possible through sensitive design and landscape measures” (Wiltshire Core Strategy Policy 51, (Landscape)*

### **Executive Summary of objections**

The reserved matters application has substantially and materially departed from the scope of the Design and Access Statement and recommendations of the Landscape and Visual Impact Assessment that were material evidence in the approval of the outline scheme.

The proposed reserved matters scheme causes unacceptable material harm to the character and beauty of the countryside and the character and appearance of Holt and its rural setting. It fails to provide an adequate quantity and quality of communal amenity green space or the street trees, landscape buffer and biodiversity plans which were part of the overall design to mitigate the landscape harm of this scheme.

These matters are contrary to Wiltshire Core Strategy Policy 51 (Landscape), Core Policy 52: (Green Infrastructure), Core Policy 57 (Ensuring High Quality Design and Place Shaping), and the Wiltshire Design Guide. The scheme is contrary to the Made Holt Neighbourhood Plan Policy H2.1, which expects proposed development to respect surrounding character and appearance and E1 addressing the provision of green infrastructure and amenity space in new development.

In addition, the reserved matters proposal fails to deliver integrated affordable housing in conformity with Core Policy 43: (Providing Affordable Homes).

The matters of objection are listed below and enlarged upon in the following sections:

- (i) Proposed housing south of PROW Holt 56
- (ii) Height and Massing: Three storey apartment blocks
- (iii) Visual impact of development to the eastern gateway to Holt – harm to views from Melksham Road
- (iv) Green Infrastructure, Public Amenity Space
- (v) Character, Appearance and Materials
- (vi) Homes for All; Differentiation of Affordable Housing
- (vii) Ecology and Biodiversity
- (viii) Sustainable Energy
- (ix) Excessive density
- (x) Noise
- (xi) Poor Quality of Submission

For reference any mention of Design and Access Statement (DAS) refers to the document submitted by Gladman as part of the Outline planning application. Any mention of Design Compliance Statement (DCS) refers to the document submitted by Bewley Homes as part of the consideration of Reserved Matters application.

## **Areas of Objection**

### **i. Proposed Housing South of Public Right of Way Holt 56**

Proposed housing south of PROW Holt 56 is an unacceptable departure from the principles established by the outline scheme Landscape and Visual Impact Statement (LVIA) and Design and Access Statement (DAS). The proposed housing obscures open rural views to the south side of the PROW Holt 56 and changes the character of the PROW Holt 56 to a suburban footway. This causes material harm to the character and amenity of the PROW Holt 56 and character and beauty of the countryside when viewed from a public right of way, contrary to Wiltshire Core Strategy Policy 57.

The rural character and views from PROW Holt 56 were judged important by the outline applicant's own LVIA and DAS, noted by the appeal inspector as a material consideration in judging levels of harm and retained in the outline scheme illustrative layout.

*“The public footpath which crosses the site should be retained in-situ and should be integrated into the proposed recreational routes around the site. Furthermore, the route of the public footpath should limit the extent of the public footpath is retained, as far as practically possible.”<sup>1</sup>*

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<sup>1</sup> Outline Scheme Design and Access Statement 04 Influences and Opportunities

## **Suggested Resolution**

Proposed housing south of PROW 56 should be removed from reserved matters proposals. The area south of PROW should be retained as open green space.

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

The addition of three-storey development will be likely to cause unacceptable material harm to the character and beauty of the countryside, contrary to Wiltshire Local Core Policy 51 (landscape) and Holt Neighbourhood Plan Policy H2.1.

The reserved matters scheme proposes 2 x three-storey apartment blocks at the centre of the proposed scheme. At appeal, the inspector noted the outline scheme was assumed to be for housing between 2 to 2.5 storeys. Visual impact and harm were assessed on this basis. Three storey development is materially different. It is not in conformity with the outline scheme DAS or LVIA evidence that were material considerations at appeal.

There is no updated LVIA evidence to demonstrate the visual impact of the proposed three storey development. It is certain that the proposed increased heights are a material change to the illustrative scheme assessed at appeal. It is highly likely the increased height will cause unacceptable material harm to the character and beauty of the countryside in views of Holt from public viewpoints.

The proposed three-storey apartment blocks fail to respect the character and appearance of the surrounding area and cause unacceptable material harm to the character of Holt. There is no character of three-storey development in the context of this site. The only examples of three-storey development within Holt are in former historic industrial areas at the Tannery and the Spa, where they relate to the scale of existing historic industrial buildings. The historic industrial area of the village has its own distinct history and building style.

The character of eastern Holt and Great Parks, adjacent to the site is houses and bungalows. This is recorded in the outline scheme DAS (Character Area 1: Great Parks/Little Parks)

*“Building heights vary from 1 to 2 storeys”* (Outline Scheme DAS)

The development of the site would form a new transition between the countryside and built area of the village. The outline application LVIA recorded views of the site are possible from the north, east and particularly the south, and were material considerations when assessing the level and weight to be attributed to visual impact and harm to the character of Holt at the outline scheme appeal.

Three-storey apartment development in this location does not respect the character and appearance of the adjacent village and will be an unacceptable and harmful and intrusion in the transition between Holt village and the open countryside.

## **Suggested Resolution**

The development should be restricted to buildings of predominantly 1 or 2 storeys with an appropriate number of buildings of 2.5 storeys.

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

The Reserved Matters scheme has now significantly and harmfully departed from the gateway design and landscape principles established by the outline scheme DAS and LVIA that were weighed in the consideration of the balance of harm and mitigation of the outline scheme. This will have a material and unacceptably harmful impact upon the landscape and visual impact of the development as assessed by the Inspector, contrary to Wiltshire Council Core Strategy Core Policy 51 (Landscape), Core Policy 52: (Green Infrastructure), Core Policy 57 (Ensuring High Quality Design and Place Shaping)

The outline scheme master plan was informed by a Design and Access Statement and LVIA which included significant discussion of how the new development would create a new and appropriate view of Holt:

*The principal access point to Holt from the east is from Melksham Road. The Melksham Road frontage will, therefore, form a key gateway, with opportunity to create a strong and positive first impression of both the new homes and Holt through carefully designed buildings and a distinctive landscape scheme. An attractive, linear area of public open space along the Site frontage will ensure that the transition between the countryside and the built area of Holt is softened when passing the Site.<sup>2</sup>*

The outline scheme proposed that the Melksham Road frontage would be gardens with low stone walls, increased scattered tree planting and that architectural styles would be consistent with the existing character of Holt.

*In line with (Holt Neighbourhood Plan) HO Policy H2.1, the new homes will be of an appropriate scale, size and architectural style to mark the arrival into Holt and will overlook Melksham Road. Also, in line with the Neighbourhood Plans desire for this location to become a "formal gateway feature", the new homes will be visible when approaching Holt from the east in order to encourage drivers to reduce their vehicular speed. New scattered tree planting between Melksham Road and the proposals will soften the built edge of the new homes, but still allow for glimpsed views. The new homes will be set behind larger front gardens and will include low-rise stone walls.<sup>3</sup>*

The outline scheme was influential within the Inspector's reasoning in assessing the impact of the development on the landscape. He noted:

*Indeed, the illustrative plans show the scheme would give the village a softer, more feathered edge when compared to the abruptness of Great Parks, which would better integrate it into the countryside around.<sup>4</sup>*

The Reserved Matters scheme has materially altered the proposals to include dense areas of development alongside Melksham Road. The increase in housing density along the boundary with Melksham Road is very significant; it has doubled from 9 homes to 18. The Reserved Matters Compliance Statement notes that the new

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<sup>2</sup> Design and Access Statement, p.25

<sup>3</sup> Design and Access Statement page 33

<sup>4</sup> Appeal Decision page 4, no.19

scheme includes “*A strong frontage is proposed to Melksham Road with a continuous building line*”<sup>5</sup>. This is markedly different to the original plans which did not have a continuous building line; the orientation of the homes along Melksham Road has changed with the majority now facing Melksham Road with parking spaces rather than gardens to the front. The orientation of housing and soft landscape setting alongside Melksham Road was strongly emphasised in the DAS<sup>6</sup> and the Design Compliance Statement does not address the impact of these changes.

There is also a significant additional car parking area along the Melksham Road frontage. Parking provision will be visibly dominant along the frontage with 3 visitor spaces and 36 front facing driveway parking spaces and no front gardens<sup>7</sup>. The plots in the eastern top corner of the development are orientated to have parking spaces at the area most visible from Melksham Road. This car parking provision will be visible in the landscape from Melksham Road.

The Design and Access statement noted that the new homes, when glimpsed from Melksham Road, would be “*of an appropriate scale, size and architectural style to mark the arrival into Holt.*” However, the Reserved Matters scheme proposes homes which are a significant change to the scale, size and architecture of the village in density, scale, architectural character and materials. The uniform use of red brick and grey roofing tiles will be visible from Melksham Road and harms the distinct character of the village. In addition, as noted previously, the inclusion of 3 storey blocks of flats within the centre of the development would be a visually dominant and incongruous feature when viewed as the new gateway to Holt.

There are significant departures from the original landscape proposals for the Melksham Road frontage. The landscaping along the Melksham Road is emphasised strongly in the Design and Access Statement and the LVIA and formed part of the Inspector’s assessment of landscape impact in the Appeal<sup>8</sup>. The original proposals included significant new tree planting along this boundary. The outline scheme plans showed 34 trees planted by the new path along the boundary with Melksham Road. This has now been reduced to 12 trees. The reduction in the landscape buffer proposals, 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 increases landscape harm.

In conclusion, the Reserved Matters scheme is a significant departure from the original proposals 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. Holt Parish Council wish this scheme to be referred to the Design West Review Panel to enable greater confidence in determination.

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<sup>5</sup> Design Compliance Statement paragraph 3.4.5

<sup>6</sup> See DAS 5.1 “*Vision 1. Create an attractive entrance to the village through the orientation and visibility of proposed housing and the siting of a linear area of open space along Melksham Road.*”

<sup>7</sup> This is contrary to the Wiltshire Design Guide 5.4.4 – parking should not reduce amenity space or dominate the front elevation of the dwelling.

<sup>8</sup> See paragraph 13 of the Appeal, “Whilst the retention and bolstering of boundary hedging and the provision of landscaping along its north, east, and south boundaries would soften this impact, to my mind this would not be sufficient to allay its harm.”

## Suggested Resolution

The proposals should alter the density and layout of housing and parking provision to reduce the harmful landscape impact. The significant landscape buffer should be reinstated with a tree lined footpath. Housing facing Melksham Road and visible from Melksham Road should be characteristic of Holt's distinctive character.

### iv. Green Infrastructure; Public and Amenity Space

The Reserved Matters scheme has significantly reduced the amount of public and amenity space. Open green space has been reduced to 1.03 hectares from 1.27 hectares. In addition, the changes from the illustrative outline scheme master plan has significantly reduced the quality of the green space contrary to Wiltshire Core Strategy Policies 51 (Landscape), Core Policy 52: Green Infrastructure, Core Policy 57 (Ensuring High Quality Design and Place Shaping), Wiltshire Design Guide and the Made Holt Neighbourhood Plan Policy H2.1 and E1.

The Design and Access Statement emphasised that the proposed new homes would be set within a robust network of green infrastructure. *New structural tree and hedgerow planting will be used to not only supplement and strengthen the existing landscape features but will also be used to enhance the proposed areas of public open space, as well as the public right of way which crosses the Site. The new landscaping will also assist with the development's goal of achieving a betterment in biodiversity value.*<sup>9</sup> There are numerous references to the provision of quality public green spaces and how this relates to the planning framework in terms of place-shaping<sup>10</sup>, healthy communities, and biodiversity<sup>11</sup>. The alterations to the scheme are very significant in their overall impact.

The Outline scheme proposed “*a central focal space, which would take the form of a shared street space and small pocket parks with seating and informal play opportunities*” overlooked by homes reflecting the historic terraced housing which overlooks the village green (Ham Green, Holt).<sup>12</sup>

The Reserved Matters scheme has significantly reduced the size of the central focal space and removed public seating features. It is dominated by three storey blocks of flats and the associated parking spaces; and has thus significantly lowered the quality of design, removing an opportunity to create an attractive amenity space for new residents. This is now a grass verge. The Wiltshire Design Guide recommends focal point open space with seating<sup>13</sup>.

The provision of formalised play areas has been reduced, from two play areas to one. The removal of the play area in the upper corner of the site reduces the purpose of the new path which no longer leads to a public recreational space. There are also reduced opportunities for informal play areas, informal amenity spaces and tranquil public spaces.

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<sup>9</sup> DAS, page 25

<sup>10</sup> See discussion, DAS page 33 – Creating a sense of Place, in accordance with CP 57, NPPF and Building for a Healthy Life design toolkit

<sup>11</sup> Core Policy 50: Biodiversity and Geodiversity – describes the need for development proposals to demonstrate how they will protect features of nature conservation and geological value as part of the design rationale.

<sup>12</sup> (DAS, page 37).

<sup>13</sup> WDG 7.1.2 and 7.2.7

As has already been noted, the PROW Holt 56 has lost its rural character and open views and will now be crossed by vehicular access to the new homes built on the south of the site. In the original plans, the PROW Holt 56 was enclosed by green space on both sides, with tree planting alongside the north side and open rural views to the south. This has now been lost; there are homes built to the south, tree planting to the north of the PROW Holt 56 has been removed in the landscape proposals and vehicles will cross the pathway. The PROW Holt 56 is surfaced with tarmac. The PROW Holt 56 directly borders unattractive features including car parking spaces, a sewage pumping station and an electricity substation. These changes will significantly affect the landscape and appearance of the green space but will also have a very detrimental impact on the value of the public space as an amenity space. The PROW Holt 56 is no longer segregated from vehicles or open to rural views and the opportunities for informal “play on the way” for children or peaceful recreational space for adults has been lost. The Reserved Matters scheme has fundamentally eroded the positive vision for the landscape setting and amenity value of the PROW Holt 56.<sup>14</sup>

Street tree planting has been significantly reduced in the reserved matters scheme throughout the site. Some areas of the site (for affordable housing) are devoid of any trees and soft landscaping. Trees and landscape make a very strong and unifying contribution to Holt’s distinct and diverse rural character. The original plans emphasised tree lined streets and tree lined paths. These have now been removed.

The original outline illustrative scheme promised generous and attractive public open spaces as part of the scheme, to obtain permission for this large development outside the village of Holt’s settlement boundary. Public spaces for neighbourly activity are a valued part of Holt and the removal or down-grading of these aspects of the development are a significant loss.

## **Suggested Resolution**

The proposals should reinstate a central green space with seating, and footpaths and all streets to be tree lined. Proposals should reinstate two play areas and opportunities for informal play and recreation with substantial, attractive public green space. Biodiversity net gain and ecology reports should be produced prior to or with Reserved Matters.

## **v. Character, Appearance and Materials**

This Reserved Matters scheme substantially departs from the illustrative layout and outline scheme Design and Access Statement that still is material to the detailed design. It fails to respect and enhance the intrinsic local character and distinctiveness of Holt or demonstrate an understanding of Holt’s identity (e.g. within a context or character analysis) and demonstrate how this has informed detailed proposals. As a result, proposals will substantially harm the landscape of Holt, a rural historic village, contrary to Core Policy 57 (Ensuring High Quality Design and Place Shaping), and design principles contained within the Wiltshire Design Guide and Holt Neighbourhood Plan Policy H2.1.

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<sup>14</sup> See DAS 5.1 “The existing public footpath which crosses the Site will be retained *in situ* and will be integrated into the proposed recreational routes and footways around the Site. New tree and wildflower planting will be provided along the route of the public footpath to enhance its setting within the new development.

This Reserved Matters scheme fails to respond to the place in which it is situated, indeed the Design Compliance Statement incorrectly names another development in Bishops Green more than once and incorrectly describes Holt as a market town. There is no reference to the Wiltshire Design Guide throughout their Design Compliance Statement. The development of this 90-home development in a sensitive site should be required to achieve the high standards of design and place shaping that is required of them.

We strongly object to the failure of the layout, landscape and architecture to respond positively to the character and appearance of Holt. Holt is a historic rural village with a strong architectural character. It is not a “market town” as is described in the introduction to the Design and Access Statement, and the addition of 90 homes in a generic and uncomplimentary style will have a significantly harmful effect.

To assist the applicant in revising proposals to address compliance with policy and guidance, we refer to the Holt Character Statement (2024 DRAFT) enclosed with this letter. This document has been produced as part of the work which is being undertaken by members of the community in the review the Holt Neighbourhood Plan. It addresses landscape setting, green infrastructure, residential form, materials, boundaries and detailing that reflect the positive characteristics of historic and contemporary development of Holt. It has been endorsed by Holt Parish Council at its meeting on 18 July 2024. In advance of completion of the HNP review, it should be regarded as guidance related to the Made Holt Neighbourhood Plan Policy H2.1. The document is intended to be utilised to understand the strong visual identity of Holt and the expected complementary design detailing which will be appropriate to comply with NPPF 129, Core Policy 57, the Made Holt Neighbourhood Plan H2.1 and the Wiltshire Design Guide paragraph 4.5.2. The Character Statement shows that the dominant materials and architectural features are:

- Local stone (buff coloured)
- Buff coloured reconstituted stone
- Red brick is a secondary material, usually used alongside stone.
- The most prominent roof material in the village is a dark red/brown Double Roman (profiled) tile.

We also note that the Reserved Matters application has significantly lowered and cheapened the proposals on character and appearance from the Design and Access statement utilised for the Outline application. The original scheme proposed the “predominance of buff-coloured stone” and red brick with the architectural character “drawing upon the strong vernacular character evident in Holt.”

The Reserved Matters application proposes red brick as the predominant façade material. The predominant roofing material is grey concrete plain roof tiles. The roof shapes are varied. Windows are white UPVC. The Design Compliance Statement does not adequately explain how the development reflects the character of Holt stating, “*The proposal is to provide a complementary character area to the village, referencing some of the traditional and modern styles in Holt whilst*” (this sentence is left unfinished<sup>15</sup>).

The street scenes are inadequate for the purpose of showing character, appearance and detailing. They do not show façade colours and materials, roof colours, parking

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<sup>15</sup> Design and Access Compliance Statement paragraph 3.7.5



provision or overall landscape context. They are also not entirely characteristic of the development, for example plots 66-70 and 82-85 (all of which are affordable rent homes) are dense with no soft landscaping<sup>16</sup>.

There is insufficient information and detailing of proposed materials to enable the 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. This should include submission of specific product specifications and samples.

In conclusion, we recommend very substantial alterations to the Reserved Matters Scheme to ensure the design respects and enhances the intrinsic local character and distinctiveness of Holt.

### **Suggested Resolution**

The proposals should be altered to utilise predominantly buff coloured stone/reconstituted stone with red brick as a secondary element for homes of all tenures. Red/brown double roman roof tiles should be a predominant feature. Architectural styles should reflect the vernacular style of Holt, including the gable roof as a predominant feature.

#### **vi. Homes for All – unacceptable differentiation of affordable housing in location and quality**

Holt Parish Council wishes to ensure that the development delivers homes which do not differentiate between tenure types, as is required by the Wiltshire Design Guide 8.3.1 which requires the distribution, architecture, plots and streets to be tenure blind. Holt Parish Council has worked with Stonewater Housing to build 10 affordable rent homes on a rural exception site which are of an exceptional standard of design and sustainability. We expect affordable homes to be the same standard as privately owned homes in this village.

Contrary to Core Policy 43: (Providing Affordable Homes), the Reserved Matters scheme has clustered affordable homes in dense sections – blocks of flats in the centre and clusters on the northern and Eastern boundaries closest to Melksham Road. The southern side of the development adjacent to open country has larger plots, none of which are affordable homes.

The character and appearance of the affordable homes are also markedly lower from the affordable homes. The quality of material and architectural detailing is of a lower standard. These include the following issues:

- The 12 1-bedroom flats do not have private outdoor space whereas open market homes all have private gardens.
- 8 of the affordable homes have no bathroom windows<sup>17</sup>.
- The design and landscaping of facades are of a markedly lower standard with parking provision dominating the front elevation of the dwelling.

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<sup>16</sup> See comment from James Taylor, Climate Officer Wiltshire Council 26 June 2024

<sup>17</sup> Contrary to WDG 10.2.6

## **Suggested Resolution**

Affordable homes should be positioned across the whole of the site and be tenure blind in design.

### **vii Sustainable energy**

The development fails to reduce Wiltshire's contribution to climate change. In contravention of Core Policy 41 there is no Sustainable Energy Strategy for the development. The designs do not meet adequate requirements for sustainability, as they do not clearly show use of solar panels. We are concerned that many properties (particularly the affordable homes) will not meet the requirements of Core Policy 41 and WDG 10.1.3 to maximise natural measures for ventilation, heating and cooling.

The documentation relating to photovoltaic panels is unclear. Design Compliance Statement 3.12.3 states that *"The proposed dwellings will be gas fuelled with additional photovoltaic panels applied to roofs of appropriate orientation."* However, it is unclear which properties will utilise photovoltaic panels.

Following a recent consultation, the Government plan to update Part L of the Building Regulations proposing to uplift the energy efficiency of all new builds starting in 2025. The new Wiltshire Local Plan (Policy 85) states that:

*"New build residential development will achieve a zero-carbon in operation standard, by significantly reducing heat and power demand of the building through energy efficient design and/or modern methods of construction. The remaining energy demand should then be supplied through onsite renewables."*

Holt Parish Council considers that the Reserved Matters scheme has a lamentable lack of ambition to work towards zero-carbon. Holt Parish Council with a rural exception site nearing completion are proud to have all 10 affordable rented homes built to Passivhaus standards. We expect the applicant to improve their commitment to sustainable energy by working with James Taylor, Wiltshire Council climate officer.

## **Suggested Resolution**

The design of this scheme must comply with current and emerging sustainable energy standards.

### **viii Ecology and Biodiversity**

It is very concerning that housing, car parking, a pumping station and infrastructure is now within 20 metres of the bat buffer zone, with increased harm from light and noise pollution. We note in the Outline Plans "Ecological Parameters Plan" how the Bewley Reserved Matters site layout has failed to implement the proposed environmental mitigations, most notably, the loss of the bat corridor on the east and south of the site.

In the Environmental Impact Assessment (2022) it states that

*"7.2 The proposed scheme includes the following intrinsic ecological avoidance, mitigation and enhancement measures and opportunities that can be conditioned:*

- *A dark bat corridor along the outer edge of the site along the northeast and southeast boundary as shown on the Development Framework Plan.”*

It states the bat buffer will be 20m to 50m in width. Within the site the aforementioned document stated that Greater Horseshoe bats had a range from 685 to 1185 registrations per night in September 2022. We support the conditioning as mentioned in this document<sup>18</sup> The material changes to the proposals will impact the tranquillity of the landscape character, including light pollution, noise and motion, contrary to Core Policy 51 (vii).

Despite the material changes to the green infrastructure, drainage and landscaping plans, the applicant has not submitted detailed updated reports on ecological mitigation and biodiversity net gain. A biodiversity net gain is required of this development in accordance with NPPF 185 and CP 50.

Salisbury and Wilton Swift comment that there is no mention of the universal bricks as conditioned in the appeal approval, or clearly marked on the planning elevation drawings, to ensure they are not overlooked during the construction stage.<sup>19</sup> In the Environmental Impact Assessment incorrect data was presented in Table 16 suggesting *“A nest box scheme at a rate of 25% of the total number of dwellings is recommended and should form a suitably worded planning condition.”* Wiltshire Local Plan, Policy 88, states a minimum of 2 per dwelling and the British Standard (BS42021:2022 guidance has 1 per dwelling. Bewley are not compliant with these policies in their approval of Reserved Matters application if they follow the Outline plans in the Ecological Parameters Plan to have 22 evenly distributed between 90 homes.

In addition, we cannot see in the submitted Reserved Matters plans provision for hedgehog highways in property boundaries. In the Outline planning application within the Environmental Impact Assessment, it clearly states that “the scheme will include connectivity measures, a ‘hedgehog highway’ with 13cm x 13cm fence holes in suitable locations to allow the free movement of hedgehogs throughout the scheme.” Also, in the outline planning application within the Ecological Parameters Plan there are 2 hedgehog houses marked as an enhancement for ecology. Wiltshire Design Guide specifies bat roosting features, bird bricks and hedgehog highways to have a dedicated plan that shows their location or identifies the provision.<sup>20</sup>

The Parish Council have already seen a sizable hedge cut down and removed from within the site contrary to the appeal conditions. This hedge was featured in the Environmental Impact Assessment document submitted with Outline Plans, Figures 5-14, showing a number of wildlife in and around it. We expect the applicant to follow appeal conditions and policies to protect the rural countryside. This includes all recommendations in the Ecological Note<sup>21</sup>.

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<sup>18</sup> Environmental Impact Assessment, Table 16. This can be secured through conditioning the proposed layout, lighting strategy and a LEMP that targets habitat enhancement opportunities for horseshoe bats.

<sup>19</sup> Salisbury and Wilton Swift comment. 12<sup>th</sup> June 2024

<sup>20</sup> WDG 6.6.1 and 6.6.2

<sup>21</sup> The Ecological Technical Note recommended that the grasses currently growing on the site cannot be cut outside of April – October and careful management to secure the safety of reptiles living on the site.

## Suggested Resolution

Bewley Homes need to provide a full updated ecological report and a biodiversity net gain report. The “All house types pack” must show detail of the location for 2 universal swift bricks per dwelling in line with Wiltshire Local Plan, Policy 88. We expect to see a dedicated plan showing provision for bat roosting features, bird bricks and hedgehog highways as per Wiltshire Design guide expectations 6.6.1 and 6.6.2. There also needs to be a full restoration of the bat corridors as shown on the Ecological Parameters Plan. Finally, Bewley Homes must not cut the existing grasses October 2024 – April 2025 to protect the reptiles shown to be on site. In April 2025 a new survey will need to be commissioned.

### ix Excessive Density

Many of the issues raised up to this point are being driven by excessive housing density in this proposal which was approved at outline for up to 90 homes. The proposed density is very high when compared to other recent developments in the rural village of Holt as shown in the table below.

<i>Location</i>	<i>App Ref</i>	<i>Dwellings</i>	<i>Area (ha)</i>	<i>Dph</i>
This proposal	PL/2024/04625	90	3.71	24.26
Great Parks and Little Parks, Holt	n/a	66	3.69	17.89
The Tannery, Holt	18/02408/FUL	44	2.1	20.95
The Star Affordable Homes, Holt	PL/2021/09777	10	0.59	16.95

If the site of 3.7 hectares is to be a similar density to the existing area as RPS Group suggest in their Planning Statement<sup>22</sup> for Bewley Homes, then this would be a development of 66 dwellings and not 90. A net density of 34dph and a gross density of 24dph is significantly higher than any other residential area in Holt. It certainly will not give a feathered edge to our rural village with a density of 24dph.

## Suggested Resolution

The proposed scheme should be re-designed at a lower density.

### x Noise

We are concerned that the Applicant is seeking to discharge the appeal condition relating to a new Noise Assessment. In the Outline Plans the Noise Assessment showed noise levels at façade exceeding noise level guidelines with windows open. This data was taken when the UK was subject to COVID restrictions which will have affected traffic and noise levels. The Inspector imposed this as a Condition, noting in the appeal judgment the need *“to protect residents from road noise an acoustic report should be approved, and its findings implemented. As these should be fully integrated into the reserved matters scheme they should be submitted with or before those details.”*

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<sup>22</sup> Planning Statement, p.

In this regard, we also note that the proposed Reserved Matters scheme has reduced the landscape buffer on Melksham Road, increased housing density along Melksham Road and changed the orientation of homes with a continuous building line along Melksham Road.

Accordingly, we consider a new full noise assessment should be undertaken as part of the Reserved Matters Scheme and the proposal to discharge the appeal condition is inappropriate.

### **Suggested Resolution**

Bewley Homes must produce a full noise assessment report. The noise assessment data must be collected over a full working period of a week and to include a weekend when the Equestrian Centre is holding an event.

### **xi Poor Quality of submission**

In reading and looking at all the documents, images and plans submitted for Bewley's approval of Reserved Matters it is clear to see all the inaccuracies, missing documents and glaring errors from the different consultancies Bewley Homes have used.

We submitted all our findings (5 pages) to the Case Officer on Wednesday 3<sup>rd</sup> July with a reply received the same day acknowledging our extensive list.

A few examples to note here –

- All House Types Pack – there are 2 plot 71s but not a plot 74.
- Design Compliance Statement – introduction mentions “market town of Holt.” Holt is a rural village in Wiltshire.
- Design Compliance Statement – pages 30 and 32 have the page heading of another development – Land West of Ecchinswell Road, Bishops Green.
- Materials and Boundary Treatment Plan – all houses to have grey roof tiles yet on Bewley Homes website some houses have red roof tiles and on the pre-application community feedback roofs were red and grey coloured. There are no website images for the affordable housing or 3 storeys high 1 bed flats.
- Planning Statement 7.33 “the proposed site layout has been amended following input from drainage consultants, with the SuDs relocated to the southwest corner of the site to better reflect the topography of the site.” In all other documents Bewley state they changed the outline plans in response to feedback with Great Parks residents.
- PV charging plan – is “potential PV location” with all roofs coloured yellow. Design Compliance Statement 3.12.3 says “the proposed dwellings will be gas fuelled with additional photovoltaic panels applied to roofs of appropriate orientation. Which houses will get PV panels?”
- Statement of Community engagement 4.17 has a typo with 2199 website users but in 1.6 within the same document it states 219.
- SCE Section 5 applicant response to feedback states “a travel plan has been submitted to support the reserved matters application”. There isn't one.
- Street Scenes colour image is inaccurate if all houses to be red brick with grey roof tiles and especially Street Scene 1 where parking dominates the frontage of dwellings.

## **Suggested Resolution**

Bewley Homes need to look at all the documents they have submitted by the various consultancies and ensure the next set of reserved matters does not contain errors, inaccuracies or missing reports.

### **x      Conditions**

Should this application be permitted, Holt Parish Council request that a condition be applied to the Construction Management Traffic Plan stating that all construction traffic will enter and leave the site to and from the East on the B3107 keeping out of the residential part of the village.

## **Conclusion**

This application for reserved matters contains material and unacceptable changes from the approved outline application 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 in particular PROW Holt 56. The design in its present form would detrimentally affect the intrinsic character of Holt and cause ecological and climate damage.

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