

At its meeting on 21 November Holt Parish Council determined to further object to this proposal and recommend that it be refused.

This third revision to the Reserved Matters proposal should be refused to require the developer to produce a scheme which is less harmful to the landscape and character of Holt, and which satisfies the requirements of Wiltshire's Core Strategy Policy 57 to achieve a high standard of design in all new developments.

This is an unallocated site on the edge of the rural village of Holt outside the development boundary. Outline permission was obtained with all matters reserved apart from access. The plans were illustrative but informative and were referred to in detail by the inspector in considering the extent of harm to the landscape and the tilted balance. HPC refer to the appeal decision in APP/Y3940/W/23/3315962 - Land south of Filands, Malmesbury, Wiltshire in which a poor scheme was rejected to require a better standard of design – *"The disadvantages of the proposal would last 100 years or more and significantly and demonstrably outweigh the benefits, assessed against the NPPF as a whole."*

Bewley Homes has proposed a scheme which fails to take account of the landscape and character of Holt. Their Design Compliance Statement (May 2024) makes no reference to the Wiltshire Design Guide. Their Nov 2024 Statement of Compliance conveniently fails to mention all areas where they are non-compliant. This is a poorly designed scheme with a harmful impact in all areas of reserved matters which can and should be better. Holt Parish Council accept houses will be built on this site but not at the expense of poor design. We will summarise the fundamental areas in which the development contravenes other relevant policies and causes major adverse harm on the landscape of our rural Wiltshire village.

Harm to Landscape – Entrance to the Village from Melksham Road

The illustrative but informative scheme layout was referred to in depth by the Appeal Inspector. It was accepted that development of the site would be harmful. Within his decision he refers to the intended retention and bolstering of hedging and landscaping on the northern edge of the development to soften the impact. He also refers to the scheme providing a "softer, more feathered edge" to the village. We therefore draw attention to the importance of the treatment along Melksham Road in the assessment of landscape impact in the planning decision.

The developer has significantly altered the illustrative but informative plans along Melksham Road which will materially harm the landscape, contrary to CP 51. A summary of changes include:

- Tree planting has been substantially reduced due to the need to preserve access to water pipes so there is now no longer a tree-lined footpath inside of the boundary hedging. This means that the development will be much more visible.
- The developer has also increased the number of dwellings along Melksham Road (from 9 to 15). Whilst the number of built blocks may be similar to the illustrative plans, the increase in dwelling numbers leads to associated urbanising features being required along Melksham Road. This frontage is now dominated by the dwelling's allocated car parking, visitor car parking spaces and bin stores.
- The developer has changed the orientation of the dwellings with 80% to face the road.
- The original plans had gardens facing the road behind low stone walls typical of the character of Holt.
- The inclusion of apartments buildings with three storeys of accommodation will be visibly jarring.

The cumulative effect of these changes is a hard urbanised edge to the village. This is contrary to CP 57 and our own Holt Neighbourhood Plan Policy (HNP) H2.1. It is materially harmful and should be refused.

Reduction in size and quality of green infrastructure and amenity space

The original scheme emphasised homes placed within a green infrastructure setting, harmonising with the landscape. The developer's new scheme makes numerous changes which taken together cumulatively lead to a significantly poorer scheme which does not achieve the design standards required by NPPF 136 and CP 57.

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).¹

The developer has significantly altered the illustrative but informative plans which will materially harm the layout and landscape contrary to NPPF 135. A summary of changes include:

- The central green space is now dominated by blocks of flats with small green verges bisected by vehicular roads. This loss of the amenity space has a significant impact on the quality of the scheme. The Wiltshire Design Guide emphasises the need for central focal spaces. Generous neighbourhood amenity spaces are a feature of Holt and contribute to the strong community feeling.
- Tree lined streets have been significantly reduced throughout the scheme.
- The original scheme had a footpath, tree lined all the way round the site, to link in with existing residential areas. This is no longer present.
- The developer has ramped up the amount of built space within the scheme to 97,171 square feet, compared to 88,865 square feet at outline. They have also significantly increased the number of larger homes on the site with 10 more 4 bed homes and also 5 bed homes which were not featured in the outline planning application. This 10% increase in built space and private gardens has had an impact on the size and quality of the green amenity space.

Once again, the cumulative effect of these changes have significantly degraded the landscape in quality from the original illustrative but informative scheme and fails to deliver the standard of design expected by NPPF 135, CP 57 and HNP E1.0.

Character and appearance

The lack of compliance with Wiltshire Design Guide and our own Holt Character Statement has resulted in a scheme of uniform generic “garden village collection” houses which are not typical of the character of Holt. Bewley have only changed their 90 red brick, grey roof houses to 90 all made with recon stone. They are only now providing information on proposed building materials for the exterior walls with the photographs in their appendix of the recent Compliance Statement which are unclear, variable and insufficient. Samples should be provided and agreed on. Nothing has been provided about windows or doors to HPC or detail provided on elevation drawings which could be enforceable by planning.

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. Detailing of materials, including boundary treatments, make a huge difference to the appearance of a scheme. Bewley are not complying with our requests or compliant with CP 57.

The appearance of the scheme causes harm to the landscape, layout and scale of reserved matters due to Bewley Homes consciously decreasing the area for affordable homes. 40% at outline of 88,865 square feet for 36 plots is significantly different to Bewley's 29% of 97,171 square feet for 36 plots. This explains their need to put the 12 one bed flats into 2 blocks of 3 storey high and for houses to have parking dominating their frontage and a complete lack of soft landscaping around the affordable plots. This is not typical of the character and appearance of newly built affordable homes in Holt at Star Ground.

¹ (DAS, page 37).

Overall, 97,171 square feet with 29% to affordable homes and 71% to private dwellings is significantly more harmful to the landscape than 88,865 square feet with 40% to affordable homes and 60% to private dwellings and is contrary to CP45. HPC strongly object to Bewley's use of square feet for their housing mix as it does not reflect the needs of the Holt Housing Survey 2020 or the ageing Wiltshire population. We expect them to justify how their mix meets CP45.

Our summary of changes in just 3 key areas show the entirety of the Bewley Homes scheme has significantly degraded the landscape in quality from the original illustrative but informative scheme and fails to deliver the standard of design expected by NPPF 129, CP 57 and HNP H2.1.

Compliance with conditions

We would also like it noted, once again:

- Bewley have not provided a full acoustic report. The Inspector was clear this should be completed prior to, or with, reserved matters so that findings can be fully integrated into the scheme.
- As HPC we provide local knowledge that acoustic conditions will have changed since the last report produced under COVID. This should include road traffic patterns and the usage of the adjacent West Wiltshire Equestrian Centre which has a full programme of events throughout the year, not just once a month at a weekend.
- Ecological enhancements need to be included in enforceable plans.
- The developer appears to have removed the requirement for precautionary working measures for reptiles from their Technical Note: Ecology Walkover and Constraints Summary. The developer must work to ensure wildlife is properly protected in line with CP50.

Conclusion

Holt Parish Council asks that the scheme as a whole is evaluated to determine whether it meets the requirements for quality design required by CP 57 as amplified by the Wiltshire Design Guide, Holt Neighbourhood Plan and Holt Village Character Statement.

This is "death by a thousand cuts," whereby each individual design change in isolation may not be egregious, but taken together the entirety of the scheme has been significantly degraded in quality from the original illustrative but informative scheme, weighed up and agreed at appeal, and fails to deliver the standard of design expected by CP 57.

If Wiltshire Council approve this against HPC wishes, we request a condition on the approval to further reserve some of the outstanding matters, to another round.

This poor-quality scheme will lead to a hard urbanised edge to a historic rural Wiltshire village, where the consequences will last for a century. The developer could and should try harder.

We strongly object to the proposal and request that it be refused.