

## **HOLT PARISH COUNCIL RESPONSE TO PL/2024/05435 Land north of Melksham Road, Holt Outline planning permission to provide up to 55 No. residential (Use Class C3) units with all matters reserved except for access.**

Holt Parish Council considered this application at its meeting on 18 July 2024, at which it received comments from approximately 60 members of the public, and wishes to comment as follows:

### ***Objections -***

- 1. Conflict with NPPF, the Wiltshire Council Core Strategy and emerging Local Plan and the made Holt Neighbourhood Plan***
- 2. Holt has met its share of new housing until 2038.***
- 3. Highways and Traffic***
- 4. Harm on the character and appearance of the village.***

These are the reasons for our decision:

### ***1 - Conflict with WC core strategy and Holt Neighbourhood Plan***

The Wiltshire Local Development Scheme (November 2021) sets out the principal documents comprising the development plan for Wiltshire. Those with a direct bearing on this application are the Wiltshire Core Strategy (WCS), the Wiltshire Housing Site Allocations Plan, and the Holt Neighbourhood Plan.

The Holt community has, through our Neighbourhood Plan (made January 2016, and current for the period 2016-2026), determined where the development boundaries of the village lie. The boundary has been reviewed and is up to date. The proposed development lies outside the settlement boundary. We are in the process of reviewing the made Neighbourhood Plan which will run concurrently.

Core Policy 1 of the WCS is clear that for Large Villages “Development outside the settlement boundary will be strictly controlled. Relaxation of the boundaries will only be supported where it has been formally reviewed through a subsequent DPD or a community-led neighbourhood plan” (paragraph 4.15). No subsequent development plan document addressing a boundary change exists, and indeed the Wiltshire Housing Site Allocations Plan (adopted February 2020) reaffirms the existing boundary (paragraph A.27).

The proposed site is in open countryside outside the limits of development for the settlement. This is in clear contravention of Core Policy 2 of the Wiltshire Core Strategy which seeks to provide new housing sites to deliver the identified needs in a community area through a Site Allocation DPD and/or neighbourhood plan. The made Holt Neighbourhood Plan, Housing Objective 3 seeks to “Ensure that the settlement boundary and green spaces within it are protected”. Policy H3.1b makes clear that new development “will not involve the outward extension of the settlement boundary of the village.”

In their application, Redcliffe Homes argue that the development should be allowed on the grounds of unmet housing need in Wiltshire. However, the proposed development fails to meet any of the exception policies set out in Core Policy 2 of the WCS (paragraph 4.25). As a non-expected development, the application, in effect, attempts to circumvent the legally established mechanisms for housing allocation.

## **2 - Holt has met its share of new housing until 2038**

The NPPF defines sustainable development, as development that meets the needs of the present, without compromising the ability of future generations to meet their own needs. The Holt Neighbourhood Plan set its vision for the future of the community from 2016. Since then, actual development has been as follows:

- Six individual dwellings completed and occupied.
- The Tannery brownfield development of 44 dwellings, which are all occupied.
- Firlawn - conversion of existing brownfield buildings to 8 dwellings under construction.
- Star Ground development of 10 affordable homes on a rural exception site now occupied.

The Wiltshire Core Strategy sets out clear targets for housing development in the County. Holt is one of the three Large Villages in the “remainder” of the Bradford on Avon Community Area. The Strategy sets a need for a further 76 houses to be provided by the BoA remainder by 2026. Holt will have provided 68 houses by 2026 which is 89% of the requirement for the whole area.

A further reserved matters application for up to 90 dwellings is currently taking place with an appeal condition to start the build within 1 year of agreed plans. If the plans remain at 90 then that is 118 in Holt alone. Another 55 takes our rural village to 173.

Furthermore, in the emerging Local Plan whilst Holt, as a large village, now is in the Trowbridge rural area, has a residual housing requirement of zero for the emerging plan period until 2038, as a result of the commitment of up to 90 dwellings granted on appeal on land south of Melksham Road.

In the context of previous and recently consented housing development, the cumulative impact of development of this site will be contrary to the settlement's role as defined in Core Policy 1, where development would be limited to that "...to meet local housing needs", it is therefore harmful and unsustainable development.

Wiltshire Council conducted a rural housing needs survey for Holt in 2020. This showed a need for affordable housing that will be fully met by the Star Ground development. There is clearly no justified, sustainable need in this community for a further 36 affordable homes as proposed in the Bewley development and a further 22 in this development. Any such excess provision would be in clear contravention of Policy CP43 of WCS and H1.2.c of the Holt Neighbourhood Plan which both call for evidenced need to be demonstrated:

*“This Plan supports the provision of affordable housing in Holt on the following basis:*

- a) the first option for meeting evidenced need within Holt to be the inclusion of such housing within the development of the Tannery site in line with Policy H1.1 criterion d).*
- b) if additional need within Holt is subsequently identified, the development of the second part of the Jephson site, Star Ground off Station Road shall be considered.*
- c) other development sites will be expected to meet any affordable housing requirements in line with Core Policy 43 of the Core Strategy and up to date and evidenced local housing needs.”*

Holt has a Made Neighbourhood Plan until 2026 and we are actively reviewing it in 2024. As required by the Wiltshire Core Strategy and the emerging Local Plan, Holt Neighbourhood Plan sets its vision for the community and will continue to do so.

### **3 - Highways and Traffic**

The traffic assessment and highway improvement proposals in this application are inadequate. Village surveys have always shown that traffic and parking are the major concerns of villagers. This application is not developing a positive entrance as a new eastern village gateway. We comment as follows from local knowledge confirmed by the opinion of many in the village.

- Pre-pandemic physical vehicle counts of movement on the B3107 always registered more than 10,000 movements per working day with heavy flows at peak times, and a considerable proportion of HGV.
- The B3107 is used as a highway to get from the A350 in Melksham to Bradford on Avon and beyond to the A36 Bath or even Somerset. The B3107 is not just a village high street.
- The length of B3107 alongside the proposed development is narrow with poor visibility at the point where traffic is failing to slow down, or speeding up, at the entrance/exit of the village. To retain the 50mph with just a t junction and signage is unacceptable and unsafe. Significant improvement to this length of highway should be considered including the provision of a full-scale roundabout at the proposed entrance along with the movement of the village gateway and 30mph limit to the east of the development.
- To suggest only 9 vehicles would leave the site between 8-9am in the Transport Assessment Plan is not representative of how many people in Holt out commute daily as well as those who use cars to take children to and from nurseries, pre-schools or schools.
- The proposed travel plan suggests that cycling would be a chosen method of transport to Bradford on Avon, Melksham, and Trowbridge. These routes are often winding, narrow and without verges, with heavy traffic flows. Cycling is only an option for the very brave.
- The proposal also suggests that there are walking routes to the East on the B3107. The road is narrow and, in places without verge, making walking extremely dangerous.
- Walking routes into the village from the proposed site are on footways in extremely poor condition, which are frequently blocked by parked vehicles due to the lack of kerbs, the narrow village roads, and the volume of traffic. Improvements to this whole route are required to make it safe for pedestrians (see Appendix A). Highways have suggested walking routes through Great Parks, but this would make journeys much longer in distance, exceeding the minimum distances as stated in the Travel Plan.
- The village shop and recreation ground are at the other end of the village, and the two village pubs are even further away - approximately a mile. This will inevitably lead to more car journeys with additional traffic and pressure on an already difficult parking situation.

The impact of road noise is significant for this site. The report by DICE indicates “the site is suitable for the promotion of residential development” (p.25). However, we question the need to use mechanical ventilation for dwellings in figure 5, p.32 as a cooling strategy for overheating in bedrooms at night due to road traffic noise when Wiltshire Council are working towards zero net carbon emissions. Indeed, the survey results in Appendix IV reveal between 1:15 – 5:15 am every night there are dips to 40 decibels, with frequent spikes up to 80 decibels. On Thurs 23<sup>rd</sup> Nov decibel levels were recorded over 90 at 9:15pm which would affect any young children sleeping. In the daytime on Sat 25<sup>th</sup> Nov levels of over 100 were recorded between 1:15pm and 5:15pm which could affect the many local people sleeping in the daytime who work at hospitals in this rural area.

Figure 6, p.33 shows all houses on the frontage with Melksham Road will exceed the upper limit in their amenity area. People want to live in our rural village and not have to encounter noise similar to inner city living every time they open a window or want to spend time in their private garden. The highway needs a significant improvement with traffic calming measures and speed restrictions to slow traffic down from the start of the site and into the village in order to lower the traffic noise with vehicles travelling at the current 50mph speed limit.

#### **4 - Harm on the character and appearance of the village**

The proposal would harm the character and appearance of the area by significantly expanding the built-up residential development of the settlement into the surrounding rural landscape. This would be highly visible, particularly from viewpoints to the west, north and east, and would conflict with a core principle of the NPPF to take account of the intrinsic character and beauty of the countryside. This is further emphasized in CP51 of the WCS.

Holt Parish Council are concerned that Redcliffe has increased the density of housing since their pre-application engagement to bring it more in line with the Bewley reserved matters application on the other side of Melksham Road. Bewley has a gross density of 24dph and a net density of 34dph. The Redcliffe outline plans for up to 55 houses exceeds the Bewley gross density which is high for Holt and not in keeping with the rural character of the landscape. This needs to be reviewed by Redcliffe. The Bewley density is much higher than any other development within our rural village and they are unable to fulfill obligations from what was agreed and accepted in the outline plans. We seek a lower density of housing to be in keeping with the character and appearance of Holt.

<i>Location</i>	<i>App Ref</i>	<i>Dwellings</i>	<i>Area (ha)</i>	<i>Dph</i>
North of Melksham Road	PL/2024/05435	55		34
East of Great Parks, Holt	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

The appearance of the houses is also a concern as Redcliffe are proposing red brick and render for facades with an equal mix of red and grey plain roof tiles. (Planning Statement) While there is a varied character of houses within Holt we will not accept red brick and render houses as typical or that a new site of up to 55 can create a new character area which is contrary to NPPF 89, 131, 139 and WCS 51, 57. The Steering group reviewing the Made Neighbourhood Plan have produced a Holt Character Statement which has been endorsed by Holt Parish Council. We include a draft copy with this objection comment. We expect any new houses to be built using this document as a design guide as well as following the Wiltshire Design Guide.

*4.5.12 Where natural stone is a distinctive characteristic of the immediate area/setting, then similar stone is preferred for use on new buildings and walls.*

The proposal would increase the population of Holt by c. 250 people (c.12%). This would adversely impact the already stressed infrastructure with unsustainable pressure particularly on:

- Traffic using the B3107
- Parking within the village (too far for the average person to walk)  
*We have already commented in section 3 about local traffic and parking issues.*
- Pre-school places - Holt Pre-School is full. Parents would have to drive to Bradford on Avon or Broughton Gifford to access early years education.
- Access to doctors – local surgeries are struggling to cope with numbers now.
- The proposal is unsustainable as the lack of public transport and employment opportunities would lead to excessive outcommuting. The bus service is minimal and not reliable to get to places of work or social occasions.

We would seek contributions to medical facilities, dentist and doctors in BOA and Melksham, Pre-school funding in BG and Holt, secondary schools in Bradford on Avon and Corsham that Holt children attend, parking refuges and pavement improvements (appendix B) as well as traffic calming measures to what could become the new eastern village gateway.

## **Conclusion**

This application should be refused planning permission for the following reasons:

The proposal conflicts with the Council's plan-led approach to the delivery of new housing sites outside of the identified Limits of Development, as set out in Core Policy 2 of the Wiltshire Core Strategy which seeks to provide new housing sites to deliver the identified needs in a community area through a Site Allocation DPD and/or Neighbourhood Plan. The proposal also conflicts with the Holt Neighbourhood Plan Housing objective 3 and policy H3.1(b).

The proposal would have an adverse impact on the character and appearance of the area by significantly expanding the built-up area of the settlement into the surrounding rural landscape. This would be highly visible, particularly from viewpoints to the north and south, and would conflict with a core principle of the NPPF to take account of the intrinsic character and beauty of the countryside, and with policy CP51 of the Wiltshire Core Strategy. The proposed housing density and materials are out of character with the village.

The application fails to provide and/or secure any mechanism to ensure that the provision of essential infrastructure, services and amenities made necessary by the development are delivered, these being affordable housing, recreation/open space, education facilities, refuse collection facilities, and highway works / sustainable transport improvements. This is contrary to Policies CP3, CP43, CP45, CP51, and CP52 of the Wiltshire Core Strategy, Policy LP4 of the West Wiltshire Leisure and Recreation DPD (February 2009) and paragraphs 8, 34, 56, 64 and 92 of the NPPF.

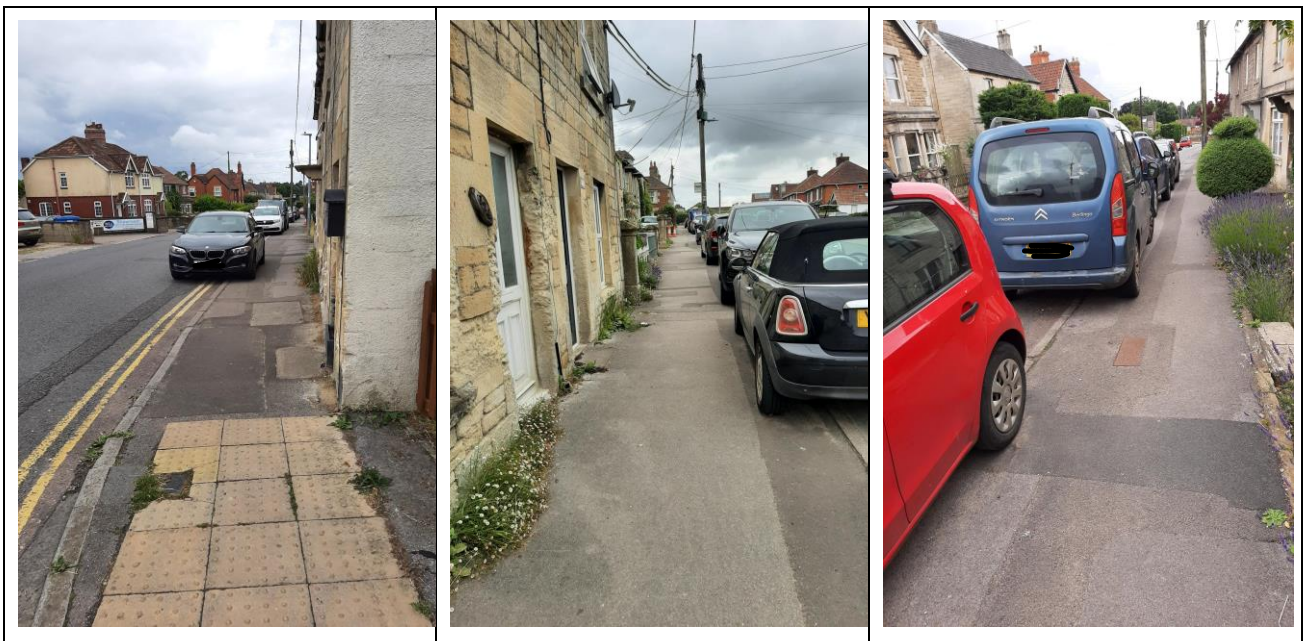
The site is in open countryside outside the limits of development defined for Holt in the Wiltshire Core Strategy. The proposal would therefore conflict with Core Policies 1, 2, and 7 of the Wiltshire Core Strategy (Adopted January 2015) which seeks properly to plan for sustainable development of housing sites in Wiltshire.

## Appendix A – Highways issues – walking into Holt

The application states that there is a clear and safe walking route into the village. These pictures illustrate the unsafe state of the footways between the proposed site and the village shop. This route needs to be made safe by the developer.

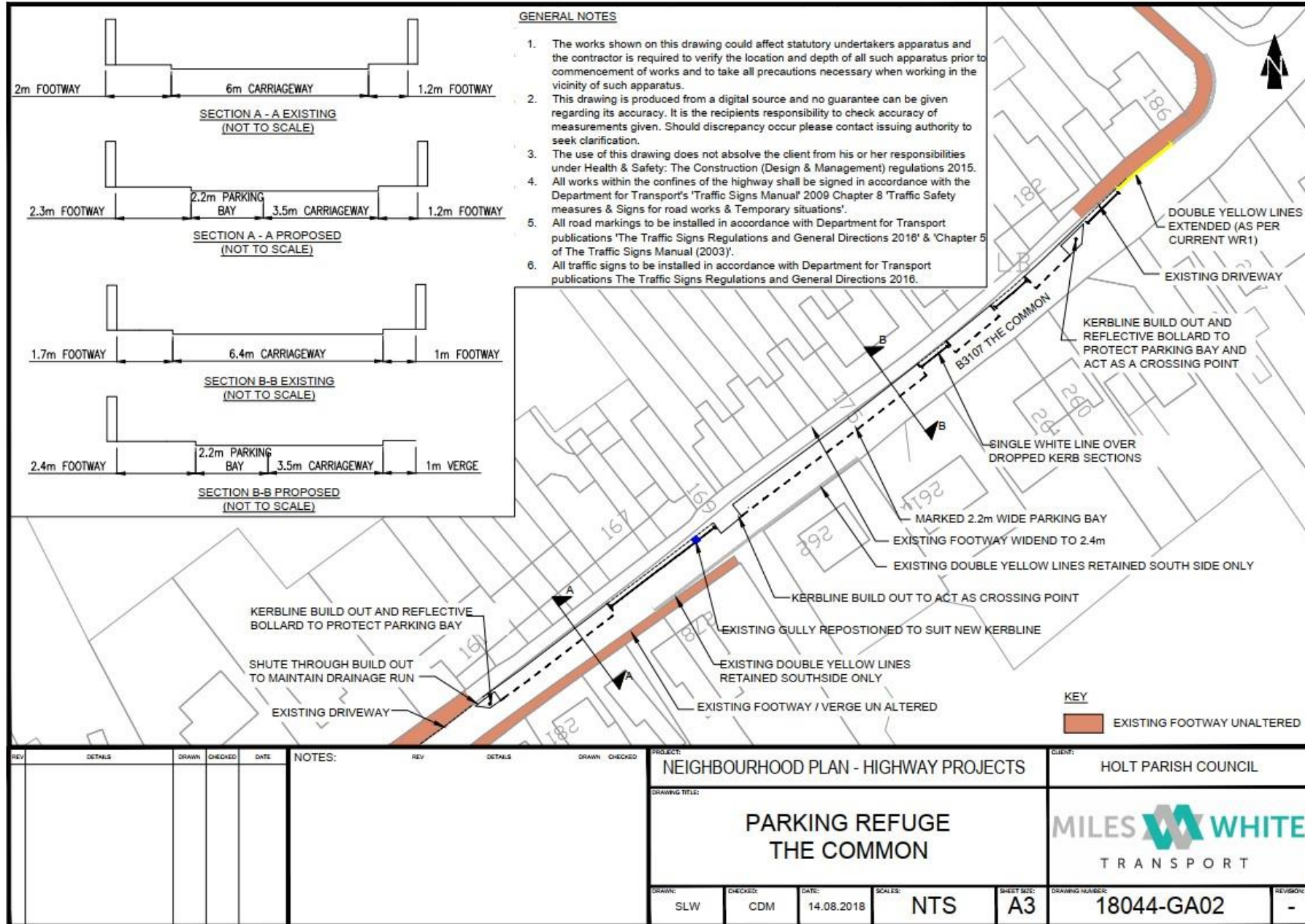


The route is also obstructed on The Common by vehicles parking on the footway as illustrated by the following pictures. This section is informally one way but residents park on the footway because of the lack of kerbs, and the damage caused by their vehicles by others squeezing through. There is room to make the arrangement more formal by the provision of a parking refuge. A solution has been designed which would not only allow safe parking but also leave the footway to pedestrian traffic and provide safer crossing points for children approaching the primary school into The Gravel via the buildouts. The design is shown at Appendix B.





Appendix B



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