

Holt Parish Council Objection to PL/2024/05435 - Outline Planning Application for 55 Dwellings at Land North of Melksham Road, Holt

Holt Parish Council (HPC) strongly opposes this outline planning application for 55 dwellings at land north of Melksham Road. HPC considered this application at its meeting on 16th January 2025.

HPC reiterates our objection submitted on 25th July (WC-24-07-307409) that the proposal is contrary to the Wiltshire Core Strategy (WCS) and the Holt Neighbourhood Plan (HNP) and undermines sustainable growth principles. The current emerging Wiltshire Local Plan allocation for Holt is zero until 2038, making this development unwarranted. All our points from 25th July remain and we would like to add these additional comments.

HPC highlights that the proposed development directly contravenes:

- **National Planning Policy Framework (NPPF) (December 2024) Paragraph 15** stresses the importance of respecting local plans and communities' vision for sustainable growth. This application disregards Holt's Neighbourhood Plan.
- **Paragraph 174(b)** requires protection of valued landscapes, which this proposal undermines by encroaching into the surrounding countryside.
- **Paragraphs 161 and 163-166** highlight climate resilience requirements, which the proposal fails to meet.
- **Core Policy 1 (Settlement Strategy)** and **Core Policy 2 (Delivery Strategy)**, which limit development in Large Villages like Holt to within defined boundaries. This proposal lies outside the settlement boundary and exceeds Holt's housing needs.
- **Policy H3.1(b)** of the Neighbourhood Plan explicitly prohibits outward expansion beyond the village boundary.
- The emerging **Local Plan** (Regulation 19 Pre-Submission Draft) reinforces Holt's zero housing allocation until 2038.

Landscape and Visual Impact

HPC asserts that this development would cause material harm to Holt's rural character and visual amenity. The site sits within the Broughton Gifford Limestone Lowland (A3), recognised for its:

- Open, rural landscape and historic hedgerow field patterns.
- Extensive views visible from public rights of way, including Holt FP2, frequented by visitors to National Trust properties.

HPC emphasises that views from Holt FP2, the public footpath between The Courts in Holt and Great Chalfield Manor, a popular route advertised by the National Trust, would be severely compromised. HPC fully support the Wiltshire Council Landscape Officers' objection (WC-24-08-309093 on 13th August 2024). Redcliffe Homes recent submission on 12th December 2024 fails to overcome this objection.

“Due to the sites 'high' sensitivity to change due to its prominent location on a sloping site, facing sensitive PRow receptors linking designated heritage assets along with the poor and uncoordinated outline design it is my judgement that the application fails to meet the requirements of the NPPF, Wiltshire Design Guide, the Neighbourhood Plan and Core Policy 51 and thus I object to it on Landscape grounds”

Redcliffe's relocation of houses slightly further down the slope to the North in their latest plans only increases the harmful impact on scenic views from the North. HPC walked the affected footpath to evaluate this harm firsthand and strongly urges the Planning Officer to do the same.



The Design and Access Statement (DAS) claims to create a “gateway” entrance to Holt, but HPC notes that the T junction entrance would require significant hedgerow removal, contradicting efforts to conserve Holt’s rural setting. By comparison, the adjacent approved (PL/2022/03315) site sought to bolster hedgerows, not remove them. The additional road infrastructure which is needed to ensure the safety of road users and pedestrians caused by this development will cause further deterioration to the character of the village and landscape causing intensive urbanisation of our village gateway.

Public Safety

HPC is deeply concerned about inadequate pedestrian safety measures in this proposal. The development site sits on the opposite side of the road to the primary school and secondary school bus pick up points, requiring residents, particularly children, to cross the busy B3107.

HPC fully supports WC Highways with their pre-application concerns as detailed in Redcliffe’s Planning Statement, p.8.

- *“Concerns regarding the access point and speeds along Melksham Road.*
- *Pedestrian access shall link into Great Parks.*
- *The shown crossing island is unsafe.”*

All potential new residents living on the Redcliffe Homes site will need to cross the busy B3107 to get on and off westbound buses, access school and preschool as well as both churches, The Courts National Trust Gardens and one of our village pubs using the Great Parks, Little Parks, Bradley Lane route improved under PL/2022/03315 to access village amenities.

While the Wiltshire Council Highways Officer initially recommended a toucan crossing as an essential safety measure, it was later omitted due to insufficient pedestrian movements, an assessment that HPC disputes based on local knowledge without the addition of c300 people. HPC stresses that the absence of a controlled crossing would endanger Redcliffe Homes residents and those crossing from the new PL/2022/03315 development to the proposed eastbound bus stop, undermining the development’s claim of promoting sustainable, safe travel. HPC strongly supports the reinstatement of the Toucan crossing originally demanded by the Highways officer on road safety grounds near the Great Parks junction, if approval is granted.

Walking routes into the village from the proposed site cannot be achieved in the distances and timings stated. Just an adult walking from the last house on Melksham Road to school, St. Katharine’s Church, Wild Herb café, Old Ham Tree pub, etc takes much longer than quoted in Redcliffe documents. Factor in families with buggies, children on scooters, a dog, then improvements detailed in our earlier comments to this whole route are required to make it safe for pedestrians from the Redcliffe Homes site. This view was confirmed by Brian Mathew MP on a recent site visit, where he experienced walking the narrow, rutted, obstructed and pitted footway and experienced crossing the Melksham Road.

The relocation of the 30mph speed limit further east is welcomed in this proposal but no mention is made of the future of the existing village gateway adjacent to the site. The B3107 is heavily used as a commuter and HGV route and HPC asserts that traffic calming measures, such as a new, more adequate gateway is provided to replace the existing, including road narrowing and speed cushions, are essential to enforce compliance.

Infrastructure

HPC emphasises that Holt lacks key services such as GP surgeries and secondary schools. Residents must travel to Bradford-on-Avon, Melksham, or further afield for medical care and education. This development would increase pressure on these external services without contributing to their improvement. HPC requests contributions towards medical facilities if the application is approved.

Public transport options remain insufficient to support low-carbon travel. Redcliffe's proposal for an additional bus stop lacks merit without an increase in service frequency. Residents would remain dependent on private vehicles due to the lack of employment opportunities in the village, the distance to essential amenities and the lack of safe cycling routes which questions the sustainability of this proposal.

The B3107 is a narrow, winding route used by lorries and farm vehicles, making cycling unsafe. HPC highlights residents' concerns:

“Vehicles have to follow cyclists for considerable distances to avoid overtaking them in unsafe places. Roads are too poorly maintained for cyclists to safely use them with significant potholes and broken tarmac. There is an increasing number of articulated lorries using the B3107, it is frankly terrifying to be overtaken by them when cycling on these roads. Children are never seen cycling on them, it is far too dangerous. Adults take their lives in their hands when they cycle to Melksham, Bradford, or Trowbridge.”

The adjacent development under PL/2022/03315, has made a s106 contribution of £100,000 towards creating a safe cycling route between Melksham and Bradford on Avon. If the Planning Officer is minded to approve PL2024/04625, HPC requests significant contributions towards local infrastructure and robust traffic-calming measures to mitigate safety risks.

In addition to our key points above we have additional comments on climate concerns and inaccuracies within documents submitted by Redcliffe Homes.

Climate and Sustainability Concerns

HPC echoes the Wiltshire Council Climate Team's holding objection, citing significant sustainability failures:

- The Energy and Sustainability Statement lacks commitments to net-zero operational energy and omits embodied carbon assessments.
- Passive solar design is minimal, and solar PV panels are not integrated at the first occupation stage.

Inaccuracies and Omissions in Supporting Documents

HPC notes several inaccuracies in the application. Such errors undermine confidence in the accuracy of the applicant's assessment:

- The Energy and Sustainability Statement (Sections 8 and 9) details other development sites and not Land North of Melksham Road.
- Visual Impact Assessment photographs are misdated as December 22nd, despite submission on December 12th.
- The DAS incorrectly lists amenities absent in Holt, including a greengrocer and microbrewery.

In conclusion HPC has significant concerns about the harmful impact of this proposal on Holt's rural character, public safety, and infrastructure and we respectfully request that the application be refused. PL/2024/05435 would introduce unnecessary growth, increasing Holt's population by approximately 300 people in an area where recent unplanned developments, such as that approved under PL/2022/03315 have already surpassed local need. The Local Plan states Holt's housing allocation as zero. Pedestrian routes from the site to village amenities, such as the school, shop, and churches, are poorly connected and lengthy, deterring active travel. The proposal is unsustainable as all the new residents will have to out-commute by car for work, medical appointments, socialising and supporting children accessing educational facilities.

HPC respectfully requests that Wiltshire Council refuse outline planning permission for PL/2024/05435 on the grounds of:

- Material harm to the rural landscape, contrary to NPPF 176b.
- Core Policy 1 (Settlement Strategy) and Core Policy 2 (Delivery Strategy), which limit development in Large Villages like Holt to within defined boundaries. This proposal lies outside the settlement boundary and exceeds Holt's housing needs.
- The emerging Local Plan (Regulation 19 Pre-Submission Draft) reinforces Holt's zero housing allocation until 2038.
- Non-compliance with Holt Neighbourhood Plan Policy H3.1(b), which prohibits settlement boundary extensions.
- Inadequate village gateway and pedestrian safety provisions with no controlled crossing on the B3107 at this location for Redcliffe Homes residents.

Holt Parish Council

January 2025