

PL/2026/04774 – Land off Melksham Road, Holt, BA14 6QP
Proposal - Variation of conditions on the approved scheme PL/2025/04414

Holt Parish Council considered this application at its meeting on 17 September 2026. In reaching its view, the Parish Council reviewed the submitted plans and supporting information, the planning history and approved Reserved Matters scheme, and applied its detailed local knowledge of the site and surrounding area.

Holt Parish Council objects to this application for the reasons set out below.

The approved Reserved Matters scheme was not the original proposal for this site. It followed several rounds of consultation and significant revisions and discussion between Bewley Homes, Wiltshire Council and Holt Parish Council after the earlier scheme was refused on design and placemaking grounds. The resulting approved scheme established important design principles, including a soft village frontage, a high-quality central green, integrated affordable housing, a strong landscape and ecological framework, parking that supported rather than dominated the public realm, and architecture and materials appropriate to Holt's rural character.

Holt Parish Council recognises that Bellway wishes to substitute its own house types for those approved for Bewley Homes. However, although PL/2026/04774 is described as “minor amendments to plot layouts and accommodate revised house types”, the submitted proposals result in wider physical changes affecting layout, landscape and ecology, parking, affordable housing, public realm, materials and architectural character. The Parish Council considers that the cumulative effect of the changes Bellway propose reduces the design quality and contextual responsiveness of the scheme, especially on gateway and rural edges.

The approved Reserved Matters scheme provides the benchmark for considering these changes. The Parish Council's objection is not simply that Bellway's proposals differ from it, nor is it based on the number of changes proposed. It is their physical effect on the design and amenity quality already secured and the cumulative loss of important elements of the approved design.

This is particularly relevant to DP3 and DP4 of the new National Planning Policy Framework. DP3 requires development to respond to its context, including through its buildings, materials and architectural features, and to create distinctive and characterful places. DP4 2c states that the LPA *“should not allow the quality of approved development to be materially diminished between permission and completion as a result of changes proposed following its initial approval (for example through changes to approved details).”*

These design principles were not simply preferences of Holt Parish Council. In approving the Reserved Matters scheme, the Officer's report concluded that it represented *“a high standard of design, scale, layout and appearance,”* satisfied Core Policy 57 and Holt Neighbourhood Plan Policies H2.1 and E1 and had satisfactorily incorporated the Wiltshire Design Guide where appropriate. Despite the extent of Bellway's proposed changes, no equivalent Design and Access Statement or design compliance assessment has been submitted to demonstrate how the revised scheme maintains that quality or responds to the site-specific design principles established through the approved scheme.

The following ten sections set out the principal changes and why the Parish Council considers them unacceptable, individually and cumulatively. The Appendix - Changes Required identifies all the amendments which HPC considers would address its objections while allowing Bellway to use its own house types.

1. House Types, Scale and Specific Plot Relationships – Fitting Bellway's House Types Within the Approved Framework

Bellway's covering letter says that its house types have a similar floorspace to those approved, with only slight changes where there is no exact match. Holt Parish Council has examined their accommodation schedule in detail and considers that this broad comparison masks important differences.

Although the total floorspace of the 53 market dwellings remains broadly similar, Bellway's proposed two and three-bedroom market homes provide 1,774 sq. ft less internal floorspace in total than the corresponding

homes in the approved scheme. Bellway has therefore not simply substituted house types of an equivalent size: it has reduced the amount of space provided within the smaller market homes while maintaining broadly similar provision across the larger homes.

The contrast is also apparent when the house types are compared with the Nationally Described Space Standard. A number of Bellway's smaller two and three-bedroom house types sit only just above 85% of the relevant NDSS floorspace, whereas its larger four and five-bedroom house types exceed the full NDSS minimum by considerably more. The Parish Council recognises that the application may not be required to meet the NDSS in full, but this comparison is still relevant evidence of how space is distributed between the smaller and larger homes. Bellway's scheme-wide total should not be relied upon to suggest that its substituted house types are all broadly equivalent to those approved.

The Parish Council's concern is not based on figures alone. Different Bellway house types have been inserted into plots and locations which were carefully considered when the Reserved Matters scheme was approved. On parts of the eastern and south-eastern edge, the Bellway homes are larger than the dwellings approved in the corresponding locations which will be discussed later. Even where the individual difference is modest, the effect must be considered together with changes to building positions, gardens, parking and the approved landscape and ecological framework.

Bellway proposes two three-storey Shipwright houses in the central part of the development in place of the approved 2.5-storey dwellings. These are Bellway's largest three-bedroom house type by floorspace within the submitted scheme. The Reserved Matters Officer's report recorded the earlier concerns about building height had been addressed through the approved design. Holt Parish Council does not accept that a change of developer house type justifies reintroducing a height issue which had already been considered and resolved.

There is a similar issue at Bellway Plot 39 adjoining Great Parks, corresponding with Plot 88 in the approved scheme. The approved house type was specifically amended to reduce the number of first-floor windows to one obscure glazed window to minimise overlooking. This was a deliberate site-specific safeguard. It should not be lost simply because Bellway wishes to use a different house type.

NPPF DP3 requires development to respond to its context and site setting through its built form, including the scale and massing of buildings. Core Policy 57 similarly requires development to respond positively to its context. Bellway has chosen to introduce its house types into a scheme whose layout, sensitive edges and relationships with neighbouring properties have already been carefully resolved. Those house types must be adapted to fit the approved framework. The approved safeguards should not be weakened or removed to make the site fit Bellway's standard designs.

2. Landscape Strategy – Protecting the Approved Landscape Framework

The approved Reserved Matters scheme established a strong landscape framework, including substantial tree planting and a 20m bat corridor within 20–50m of greenspace along the south-eastern edge "which will be unlit to maintain its function as a commuting route for bats"¹. This is directly relevant to NPPF DP3, which requires development to respond to its context and site setting and includes Nature as one of its key design principles.

At Plots 30-33 and 83-84 development immediately adjoins and in places now encroaches into the approved 20m eastern ecological corridor. The cumulative effect of Bellway's changed house types, increased footprints on particular plots, revised plot arrangements, parking and associated development reduces the width, landscaping, darkness and ecological function secured through the approved scheme. Holt Parish Council strongly objects.

Of the six houses on the eastern edge, plots 30, 31, 83 and 84 extend into the approved 20 m bat corridor and at Plots 32 and 33 they abut the 20m bat corridor. Once these homes are occupied, light will spill from

¹ Technical Note: Ecology Walkover and Constraints Summary. Figure 2. P.9

windows, including ground-floor living rooms, and residents may install porch, security, decorative and garden lighting. This domestic lighting is not covered by Bellway's street-lighting calculations and would be difficult to control reliably for the lifetime of the development. A dark ecological corridor should be protected through the physical layout, rather than depending on the future behaviour of individual householders or repeated enforcement action.

Paragraph 4.15 of the 2025 Technical Note confirms that a sensitive lighting strategy was required to be considered at Reserved Matters stage. The approved scheme responded to that requirement by keeping development further back from the corridor. Bellway's street-lighting design does not resolve the Parish Council's principal concern. Holt Parish Council therefore asks Bellway to move the affected houses, gardens and parking back outside the approved 20 m corridor and restore the separation secured through the approved layout.



The Parish Council notes that the 2026 Technical Note contains less discussion of the dark corridor than the earlier ecological work, which recognised the importance of limiting light spill onto the eastern boundary. It also records that a pond created through remedial works has been colonised by great-crested newts. The presence of GCN highlights that the proposed green infrastructure will play a vital ecological role in the landscape context. This makes careful consideration of Bellway's changes to the corridor and its surroundings particularly important.

At Plots 85–87, the sensitivity is different as they form part of the exposed south-eastern edge adjoining the Public Right of Way and open countryside. The Bellway house types proposed on these particular plots are larger than the dwellings approved in the corresponding locations. The house types across this part of the site should be reconsidered so that this rural edge retains the soft, feathered character envisaged by the Appeal Inspector (APP/Y3940/W/23/3315432).

Bellway also removes approved trees at the Great Parks entrance, near the central area, alongside the Public Right of Way and within the orchard. This further changes the relationship between the development, its landscape setting and the rural edges. Taken together, these changes result in the approved landscape and ecological framework having to accommodate Bellway's revised layout, rather than Bellway's house types being accommodated within the approved framework. The landscape framework and dark corridor were principal components of the approved design, not residual spaces capable of being progressively reduced or rearranged.

The Parish Council is concerned that the submitted LEMP has not been fully updated for Bellway's proposals. It still refers to "Bewley Homes" in two places and, while Bellway commits to 25 integrated swift nest bricks, it provides no Bellway house-type drawings showing precisely how the bricks will be incorporated. The ecological plans (Figure 1D) which purport to identify their locations also appear to use the earlier Bewley layout rather than Bellway's submitted General Arrangement. Under the approved scheme, each relevant house type had an individual drawing clearly identifying the position of the swift brick within the *Technical Note: Ecology Walkover and Constraints Summary* dated 12 June 2025. Holt Parish Council would welcome Wiltshire Council securing the same level of detail for Bellway's substituted house types. The Parish

Council also supports the comments from Salisbury and Wilton Swifts dated 30 August 2026 and asks Bellway to consider increasing its swift-brick provision.

3. Electricity Substation and South-west Area – Protecting the Landscape Buffer

The approved substation was located within the eastern part of the development. Bellway proposes to relocate it into the south-west landscaped area, introducing additional built infrastructure and hardstanding into public open space alongside the community orchard and pumping station, and close to existing gardens at Great Parks.

This area performs an important function in the approved scheme, providing a landscaped edge to the development, softening the pumping station and providing separation from Great Parks. The Reserved Matters Officer's report specifically referred to the open space surrounding the pumping station when assessing this relationship and concluding that the approved development would not result in a material loss of privacy.

The community orchard was not incidental planting. The Officer's report identified it within the public open space and recognised its contribution to landscape and biodiversity. Compensatory planting elsewhere would not replace its particular contribution to the character and function of this space or its role within the buffer to Great Parks. The approved orchard should therefore be retained. The approved attenuation pond should likewise be retained as a permanently wet feature throughout the year as approved, designed and managed so that its landscape and ecological contribution is not diminished.

Holt Parish Council does not consider that accommodating Bellway's revised layout and house types justifies diminishing the landscape, ecological and amenity functions of the south-west space. Bellway's proposal would introduce a second utility installation and associated hardstanding into an area approved as landscaped public open space and as a buffer between the development and Great Parks. The substation should remain outside this area, and the approved orchard and landscaped buffer to Great Parks should be retained.

4. Central Green and Public Realm – Retaining the Heart of the Development

The approved Reserved Matters scheme created the central green as the principal focal point of the development, framed by architecturally interesting homes, with parking designed not to dominate the public realm. The Officer's report recorded that the revised scheme had satisfactorily addressed the Parish Council's previous concerns, particularly through the central amenity space designed to create a "village green" in the centre of the site.

Bellway retains the green itself but substantially redesigns its surroundings. The distinctive alms-house-style composition and associated parking courts are lost. A mix of one, two and three-bedroom house types is introduced, resident parking becomes more prominent and visitor parking around the central area is lost.

The issue is therefore not simply whether the same area of green space remains. The buildings, parking and landscaping around it are part of what made the approved central green work as the heart of the development. This is directly relevant to NPPF DP3, particularly its principles for Built Form, Public Space and Identity, which seek well-defined and characterful public spaces that create a strong sense of place. Core Policy 57 and HNP Policy H2.1 similarly require high-quality design that responds positively to local context and provides good-quality public open space.

Holt Parish Council considers that Bellway's changes materially weaken the character, enclosure and sense of place of the central green. The Holt Character Statement shows the importance of village green spaces and the character of the buildings which surround and define them. Retaining the area of green space alone is not enough: the quality of its surroundings and the design principles which made it the principal focal point of the approved scheme should also be retained.

5. Affordable Housing – Retaining Design Quality and Integration

The number and tenure of affordable homes remain unchanged. The issue is the physical effect of Bellway's changes on their design, integration and parking arrangements, particularly around the central green and Melksham Road frontage. Affordable housing should not receive a lower standard of design as a consequence of changing housebuilder.

Bellway removes all of the car ports serving affordable homes. These formed part of the approved design and are not Bewley house types requiring substitution. Their wholesale removal therefore goes beyond the minor amendments necessary to accommodate Bellway house types and no clear design justification has been provided for the change. The physical effect is to make parking serving the affordable homes more prominent in views within and into the development. This is particularly apparent at proposed Plots 14/15 on the Melksham Road frontage, where the approved car port helped contain and soften views of parking. Bellway replaces this with exposed parking facing Melksham Road, increasing the prominence of parked vehicles at the village entrance. Removing all of its car ports makes parking more visually prominent and diminishes the design quality secured through the approved scheme.

As set out in the previous section, Holt Parish Council also objects to Bellway's redistribution of the approved alms-house-style one-bedroom affordable maisonettes. They formed a distinctive architectural feature around the central green with a deliberately designed composition for the character of this important space. This is a design and integration issue. The approved scheme treated the affordable housing as an integral and tenure-blind part of the development.



Approved Bewley



Proposed

This is consistent with NPPF DP3's emphasis on Liveability, Built Form and Identity, and with WDG 8.3.1 which expects affordable housing to be well-integrated and tenure-blind, with equal standards of architecture and high-quality design. Holt Parish Council considers that Bellway's revised affordable housing should retain the design quality, integration and appropriate parking secured through the approved scheme.

6. Parking – Meeting Standards Without Dominating the Public Realm

Parking was carefully considered as part of the approved Reserved Matters scheme, balancing Wiltshire Council's adopted parking standards with the need to avoid parked vehicles dominating street scenes and the public realm. The Officer's report recorded that all dwellings had the correct number of parking, garage or car port spaces and that changes had been made to ensure each dwelling had a conveniently located parking space.

Bellway's revised parking strategy removes all car ports and the central parking court, makes parking more prominent in a number of street scenes including the Melksham Road village entrance, and removes visitor parking around the central area. The submitted parking allocation plans appear to show a number of dwellings that do not meet Wiltshire Council's adopted parking standards. Holt Parish Council has particular concerns about Plots 26, 27, 28, 29 and 55. The apparent shortfall at Plots 28 and 29 has also been independently identified by Wiltshire Council's Housing Enabling Team, which notes that these two-bedroom dwellings require two parking spaces but appear to have only one space each.

Holt Parish Council also notes the inconsistent approach to parking for five-bedroom homes. In the approved Bewley scheme, all five-bedroom homes were consistently provided with two parking spaces and a double garage. Bellway's provision appears to vary considerably: Plots 17, 78, 85 and 86 retain this level of

provision, Plot 84 has two parking spaces and only a single garage, while Plot 42 has four parking spaces and a double garage. Although Plot 84 meets the minimum adopted parking standard, this considerable variation between comparable five-bedroom homes further demonstrates the need for Bellway to review its parking strategy across the development.

In addition to compliance with the adopted parking standards, parking is also a design and placemaking issue. NPPF DP3 includes Movement and Public Space amongst its key design principles, including the need to integrate parking so that it does not dominate the street. The loss of car ports and the central parking court makes parked vehicles more visually prominent in locations where the approved scheme had deliberately sought to prevent parking dominating the development.

Some parking spaces shown on Bellway's submitted plans also appear on gardens and pedestrian paths. Holt Parish Council therefore considers that Bellway should demonstrate clearly that every dwelling meets the adopted parking standards and revise the parking arrangements where necessary so that parked vehicles do not dominate the street scene and public realm achieved through the approved scheme.



7. Melksham Road Frontage – Retaining a Soft, Landscape-led Entrance to Holt

The approved Reserved Matters scheme responded to the soft, landscape-led ‘feathered’ entrance to Holt described by the Planning Inspector through its landscaping, house design, materials and parking arrangements. The Officer's report recorded previous concerns about the frontage had been addressed through the removal of parking areas and enhanced planting along the Melksham Road boundary. It also supported the approved 2m hoggin path.

Bellway's proposals simplify house designs and roof forms, remove the approved render-and-stone-quin feature treatment, remove an approved car port so that parking becomes more visible, and replace the approved hoggin path with a “mown path TBC.”

No single one of these changes defines the character of the frontage. Their cumulative effect, however, is to remove elements that softened the approved village entrance and gave it architectural and landscape character, resulting in a harder and more standardised frontage with parked vehicles more apparent within the street scene. The street scenes at the end of Section 7 illustrate what Holt Parish Council previously described during consultation on the first Bewley scheme as “death by a thousand cuts” – individually the changes may appear modest, but together they materially change the character of the village entrance.

This is directly relevant to NPPF DP3's requirements for development to respond to its context and site setting and its emphasis on Identity through visually attractive, distinctive and characterful development. Core Policy 57 similarly requires development to respond positively to local context and reinforce local distinctiveness. The Holt Character Statement identifies the importance of retaining the distinct character of the village's approaches and gateways.

The approved Redcliffe development opposite responds to the same village entrance with landscaped frontages, varied roof forms and feature materials. The two developments will be experienced together on

entering Holt and demonstrate that these design principles can be achieved using contemporary developer house types. Holt Parish Council therefore considers that Bellway should retain the landscape-led character, architectural variety and reduced prominence of parking secured along the approved Melksham Road frontage.



8. Rooflines and Architectural Variety – Retaining Architectural Interest

Bellway's Material Strategy also identifies GRP chimneys on 16 plots. Their appearance and relationship with the submitted house-type drawings should be clarified, particularly as these features appear to add architectural interest while other distinctive materials and detailing from the approved scheme are being removed.



The approved Reserved Matters scheme used a mix of house types, roof forms and architectural detailing to create visual interest in line with the rural character of Holt and avoid the appearance of a housing estate.

Bellway's proposed house types produce flatter and more repetitive rooflines. The loss of gabled forms and architectural variation is particularly apparent on the eastern approach, Melksham Road frontage and central green, where the approved scheme created more distinctive street scenes. The greater architectural variety within the approved scheme better reflects the character of Holt identified in the Holt Character Statement.

	3 beds	4 beds	5 beds
Approved	7	4	4
Proposed	4	1	1

This reduction in variety is also apparent in the accommodation schedules for the three, four and five-bedroom market homes. The table to the left shows the reduction in the number of different house types, reinforcing what can be seen in the approved and proposed street scenes.

NPPF DP3 places particular emphasis on Identity, including visually attractive, distinctive and characterful development and a coherent approach to materials and design. Core Policy 57 similarly requires development to respond positively to local character and reinforce local distinctiveness. The issue is therefore not whether individual Bellway house types are acceptable in isolation, but whether their combined use across the development retains the architectural quality, variety and local character secured through the approved scheme. Holt Parish Council considers that Bellway's more limited range of house types and roof forms does not achieve this and should be reconsidered, particularly in the most visually important parts of the development.

9. Materials and Feature Houses – Retaining Local Distinctiveness

Holt Parish Council recognises that Bellway retains many elements of the approved materials palette. The issue is the loss of distinctive materials and detailing which formed part of the approved design. Bellway removes all eight render-and-stone-quoin feature houses and also removes the approved stone window detailing from four red-brick houses, reducing the architectural variety and local distinctiveness of the scheme. These materials and details also reflect features found on existing houses along Melksham Road. These losses result in a blander, and less visually interesting overall appearance, particularly at the site's most prominent locations.

The approved scheme used contrasting materials and architectural detailing to create feature buildings in prominent locations and reflect local character. This is directly relevant to NPPF DP3's emphasis on Identity, including visually attractive, distinctive and characterful development and a coherent palette of materials and design characteristics. Core Policy 57 similarly requires development to respond positively to local character and reinforce local distinctiveness, while the Holt Character Statement provides clear evidence of Holt's particular architectural character and identity.

Bellway's covering letter explains that the material changes arise from commercial procurement. While this may explain why Bellway wishes to make the changes, it does not justify their effect: the loss of feature buildings and architectural differentiation in prominent locations within the development. Commercial procurement choices should not result in the quality and local distinctiveness secured through the approved scheme being diminished.

NPPF DP4 2c is particularly relevant: the LPA should not allow the quality of approved development to be materially diminished through subsequent changes to approved details. The comparison below illustrates the effect clearly: approved Bewley Plot 10 on Melksham Road (left) and substituted Bellway Plot 9 (right).



10. Energy and Sustainability – Applying a Consistent Standard Across the Development

Holt Parish Council welcomes Bellway's commitment to include solar panels on all homes. However, Bellway's anticipated build programme could result in homes within the same development being built to different energy standards. The Parish Council considers that Future Homes Standard principles, including air source heat pumps, should be adopted across the whole development from the outset.

This would provide a consistent approach to sustainability across the development and is supported by NPPF DP3 2b, which seeks development that mitigates and adapts to climate change and minimises energy use. HNP Policies H2.1(d) and E1 provide further local support for sustainable design and green energy.

Conclusion

Holt Parish Council recognises that Bellway wishes to substitute its own house types for those approved for Bewley Homes. However, PL/2026/04774 goes significantly beyond the substitution of house types and associated minor amendments. The Parish Council's objection is not simply that the proposals differ from the approved scheme, nor is it based on the number of changes made. It is their physical effect, individually and cumulatively, on the design quality, landscape and ecological framework, public realm, parking, residential amenity, architectural character and sense of place secured through the approved Reserved Matters scheme.

The proposed changes diminish important elements of the approved scheme, including features specifically introduced, amended or relied upon when the Reserved Matters scheme was found acceptable. The approved scheme is the appropriate benchmark: it was the outcome of substantial revision and was subsequently found by Wiltshire Council to represent a high standard of design, scale, layout and appearance.

NPPF DP3 requires development to respond to its context and site setting and places particular emphasis on Built Form, Public Space and Identity. DP4 2c is equally clear that the LPA “should not allow the quality of approved development to be materially diminished between permission and completion as a result of changes proposed following its initial approval (for example through changes to approved details).” Holt Parish Council considers that, taken together, Bellway’s proposed changes would materially diminish the design quality and key principles of the approved development. The application is therefore unacceptable as submitted and should not be approved unless the changes and safeguards identified by the Parish Council are secured through revised plans and documents.

Holt Parish Council recognises that Bellway has retained a number of elements of the approved scheme, including the play and trim-trail provision, street furniture, EV charging, stone boundary walls with cock-and-hen topping on some prominent plots and much of the approved materials palette. The Parish Council also welcomes the proposed use of solar photovoltaic panels, cycle storage and overall provision of visitor parking. These are positive elements, but they do not outweigh the cumulative effects of the wider changes identified in this submission.

Bellway’s covering letter attributes the changes to the approved scheme to its house-type range and commercial procurement requirements but those considerations, particularly commercial procurement, do not justify materially diminishing the quality of an approved development. The recently approved Redcliffe scheme opposite provides useful contemporary evidence that the design principles at issue remain achievable at this location using current developer house types, including landscaped frontages, car ports, varied roof forms, feature materials, appropriately integrated utility infrastructure and a consistent approach to Future Homes Standard principles. The schemes are separate and the Parish Council does not suggest that Bellway should replicate Redcliffe. However, it demonstrates that retaining the quality and key design principles of the approved scheme is a reasonable and achievable expectation, notwithstanding Bellway’s stated commercial and procurement considerations.

Holt Parish Council therefore objects to PL/2026/04774 as submitted. The accompanying Changes Required appendix identifies the amendments which the Parish Council considers would address its objections while allowing Bellway to use its own house types. The Parish Council wishes to work constructively with Bellway and Wiltshire Council to secure all the changes. If the identified design principles and safeguards are retained or restored, Holt Parish Council considers that the current application could be made acceptable.

Appendix to Holt Parish Council comments on PL/2026/04774

- A. Changes Required to Address Holt Parish Council's Objections
- B. Holt Character Statement
- C. Power point presentation used at Holt Parish Council meeting on Thursday 17th September