

A17 25 14 Admin 01 NB

Wiltshire Development Control  
C/O Steven Simms

23<sup>th</sup> March 2026

Dear Steven,



**PL/2025/08898 - 21A Hawkeridge, Westbury - Demolition of existing 1.5 storey dwelling and construction of 6 new dwellings**

Following the comments received during the consultation process, we have made a number of changes to the proposals which have been submitted alongside this covering letter. We have provided additional commentary on this below.

**Highways Matters (to be read in connection with submitted drawing A17 25 14 P01 and P02)**

Firstly, we note that the Highway position is 'comment' rather than objection. And so, we hope that all the changes and additional information below supports this position or can be changed to 'no objection'.

Dealing with the comments raised in order:

The proximity of the parking spaces has been adjusted on Plot 2. They have been moved slight further to the north. We also note that the junction radii of the modified access were previously incorrectly positioned. It has now been moved to the front of pavement as opposed to the previous back of pavement position. In combination with the site ide changes, the length of the passing space at the front of the site has also been significantly enlarged. Whilst these have not made massive changes, we hope that the combination of these small changes will be considered positive.

We also now show the visibility splays to both access locations.

We note that the western visibility splay for plot 01 crosses the land of 21b Hawkeridge. However, the applicant owns this property as well and so the full 2.4 x 43m visibility in both directions can be easily achieved in land under the applicants control.

On the access for Plots 02 – 06, the required visibility splay to the west can be achieved. The full visibility splay to the east cannot be achieved. On the updated drawings, we show the maximum splay that can be achieved as being 2.4 x 32m (at 2.0m set back this rise to 33.7m).

Whilst this falls below the standard requirements we note that the main road in Hawkeridge is not a through road and all nearly all traffic coming from this direction will be almost exclusively from one of the 30 or so more dwelling, the Public House or the Chapel and so so very low traffic movements are likely. These are also likely to be generally at low speed given the line of the road and the proximity of the traffic lights to the west. Furthermore they will likely be located towards the other side of the highway. We note that we can achieve far greater distances than the 2.4m x 25m visibility splay required for 20mph zones. As such, we believe that the achievable visibility splays should be acceptable.

We have also increased the number of parking spaces on Plots 01 and 02 to 3 spaces.

We have also added a dedicated short term bin store semi-enclosure / area at the front of the site adjacent to the highway.

Generally, there is enough room on all the plots to provide secure cycle storage. If this needs to be a dedicated secure container we would ask that this is secured through condition.

**Ecology Matters (to be read in conjunction with submitted drawing A17 25 14 P01, P03, P23, P24 and P25)**

The ecology comments are set out numerically and the below following comments follow this.

5. Firstly, whilst we accept the garden is considered a greenfield in planning terms the specific context of this site could not be further from this. Whilst much of the garden is open and lacks any structures this is a domestic garden. We note that that the site currently benefits from full permitted developments rights and has no special designation. Bearing this in mind, the rear garden area (forming the main area of the site) all trees, hedgerows and other features are not afforded any protection and could be the subject of potential alteration without prior approval being required. We also note that the only reason this property has become available is through the passing of its elderly owner which has meant that limited garden maintenance and activity have taken place. The land has been partially maintained by the applicant but any future long terms occupant is very likely to intensify the use of the garden its enhance its garden characteristics

Also, fundamentally, we also note that the site is surrounded on nearly 3.5 of 4 sides by existing residential developments. Just 14 % on the site boundary connects to open countryside. We have prepared a 'Proposed Location Plan' to illustrate just how enclosed the site is and how it can be genuine considered an infill where no buffers and enhanced landscape features are present to connect to.

Dealing with the loss of habitat we note concern of the habitat net percentage change of -80.17% and a hedgerow net percentage change of -16.23% as submitted. As such, we have reviewed the design and layout of the proposals.

All the principles of the mitigation as previously proposed is retained. However, this has been enhanced with a wider buffer zone of a min. 5m on the north and east boundaries. This buffer zone will also be the subject of substantial enhancement and planting.

The result of these changes are general improvements to the figures which now show a habitat net percentage change of -56.06% and a hedgerow net percentage change of +0.26%.

We note that this is still a shortfall and we would be more than happy to discuss very specific requirements on how these shortfalls can be made up by offsite contributions for specific activities within the TWBMS or Impact Zones for Bat assuming they exist which can be ensured through a S106 agreement.

We note that the ecology officers comments based on the TWBMS require all development in the yellow zone to mitigate for habitat loss onsite. However, to achieve these requirements onsite would make the whole site financially unviable due to its development scale and the specific characteristics of the site and construction climate. In the past we have agreed with the ecology team that black and white compliance with the TWBMS is not the only way to find an agreeable solution and so in the interests of consistent decision making, we hope that a more nuanced approach can be agreed in this situation where we believe targeted offsite mitigation would be far more beneficial.

6. Buffer zone - As part of the redesign, we have widened the buffer to a min. 5m.

Dwelling Locations - We have also reviewed the design and positioning of plots 04, 05 and 06. These have been amended and moved further away from the northern boundary. However, due to other development restrictions discussed elsewhere, plots 04, 05 and 06 have to be positioned to some extent in this general location.

Securing Ecology Benefits and Mitigation - As stated earlier, before one considers any net gain, the existence of the existing features cannot be secured. As such, this form of development on the site actually provides an opportunity to secure the status quo as a starting point. Widening of the buffer zone and increasing the gap. We also note that the northern boundary is to the north of the dwellings. As such, they. With appropriate native tree and hedgerow specification, this boundary can be designed to ensure that very large tree species are not included and so any pressure can be minimised. On the eastern boundary, most of the buffer zone is adjacent to the communal spaces and so this should not be of concern. An appropriate S106 agreement and associated conditions, combined with a site wide Management Strategy would give the LA maximum control on the retention and long-term enhancement of these features. The buffer zones would not be in the ownership of any one individual property owner and so their power to force amendments would be very limited.

Glazing - The rear elevations of plots 4 and 5 have had the area of glass significantly reduced where they front the ecology buffers. They are limited to just a single area of larger glass per dwelling which relate to the living spaces, and it would be proposed to have the glazing specification in these openings designed and specified to

mitigate against light spill. Due to the amended setting out, these are also further from the rear property boundaries.

Plot 6 has been reorientated and redesigned so that only bathroom windows face the northern.

Human Disturbance - We are not sure how valid this comment is when one looks at the real situation on the ground. The site is surrounded by existing family scale dwellings and with some very close to the boundaries and all being rear gardens. Any new owner is entirely likely to more intensively use the garden and so, the potential for all the disruption of private garden use and amenity is already significant. Couple this with the potential development under PD or through householder development we are not sure that this statement has any quantifiable and material impact.

7. We would expect a specific pre commencement condition attached to any approval to control external lighting which is relative standard.

8. We would expect a specific pre commencement condition attached to any approval to allow agreement of a CEMP which is relative standard.

9. We believe this is addressed above.

12. We confirm that the applicant agrees to a Strategic Habitat Mitigation Contribution which we assume will be secured via a S106

13. We confirm that the applicant agrees to contribute towards the Council's Strategic Recreational Pressure Mitigation Scheme we assume will be secured via a S106

We note that the Practice recently gained Approval for a development project at No.52 Woodmarsh. This was for the demolition of a single storey dwelling and its replacement with 4 new 2/3 bedroom single storey dwellings. The development actually showed a financial loss as of mid 2025 and the development is no longer moving forward.

The purpose of this reference is to illustrate that in order to retain quality and make the proposal financially viable, particularly in respect of further rises in the cost of construction the development needs to be of a scale commensurate with the proposed.

## **Summary**

The proposals can provide appropriate controls and ecology mitigation, but these can only be achieved through a balance of onsite and offsite works. Whilst we note that the Ecology Mitigation for this development might not be ideal in reference to the TWBMS, the following constraints and opportunities that the development encompasses should be taken into consideration in forming a balanced decision:

This is a relatively unique village site where there has been considerable surrounding back land development, and the approach can be seen to be entirely contextual with the existing urban grain. This constitutes the absolute essence of infill development.

The proposed dwellings in the existing garden are all single storey. We believe that this site provides an excellent opportunity to provide single storey dwellings at a time when most developments do not offer these despite a known demand. The dwelling have been designed so that no usable loft space is available to provide the LA maximum control over intensification through upward conversion / expansion. This allows for new dwellings with minimum impact on the adjoining context, not built and natural.

The site is financially unviable with fewer single storey units leaving the only option to maintain this level of density being to increase heights of all the dwellings Whilst we consider this might well be entirely in line with policy, this will compromise the unique characteristics of the proposals.

This is a small infill site surrounded of three sides by development. These surrounding developments have no buffers or boundary protection and any further increases in buffer zones provided on this development will be disproportionate and provide inappropriate and disconnected patches of habitats. Supporting offsite wider habitat creation and enhancement in a targeted location where onsite benefits would clearly be limited seems entirely more appropriate and will have a bigger, more positive impact.

Fundamentally, Wiltshire is falling significantly short on providing its 5 year land supply. And far from being an overdevelopment, the proposals are commensurate with the surrounding dwellings and entirely appropriate within this village infill setting.

Whilst this may no longer carry significant weight given the introduction of the NPPF in 2007 and subsequent policy update the application 04/00697/OUT. This was for a slightly large site and but with three additional units. The second of two reasons for refusal state 'the proposed development represents an inefficient use of land'. Given the LA's inability to prove their Five-Year Land Supply we suggest that proposed density of development should be considered as appropriate.

Developing in the way proposed also has the broader enhancement of replacing a poorly performing existing building with efficient modern new dwellings which reach modern standards in all aspects.

As the decision maker we ask that on balance, the application is supported with the ability to provide a more appropriate targeted offsite contribution as we believe all other matters are now resolved on the basis of this updated submission.

Yours Sincerely



For and on Behalf of **ATELIER 17 LTD**

**Nigel Bedford RIBA BSc (Hons) MArch MSc**