PL/2026/02943 – Land off Trowbridge Road, Bradford on Avon

Holt Parish Council objects to this application.

Although the proposed housing lies within Bradford on Avon, much of the proposed country park, riverside open space and environmental mitigation, lies within Holt Parish. The application therefore has direct implications for Holt's landscape, Green Belt, Public Rights of Way, transport network and future management of land within the parish. Holt residents rely upon Bradford-on-Avon for rail services, healthcare, education, employment and shopping. This development has an impact on Holt and its residents. Holt Parish Council's comments are informed by its ongoing Neighbourhood Plan Review and the responses of 238 households. Holt Parish Council's Neighbourhood Plan consultation found widespread concern that flooding, traffic congestion and an already constrained road network are reducing access to employment, healthcare, schools and other essential services.

Holt Parish Council's objection is based principally on

- the principle of speculative Green Belt development;
- and the cumulative impact of major development on flood resilience and the surrounding highway network.

Should Wiltshire Council nevertheless conclude that planning permission should be granted, Holt Parish Council considers that the application would require substantially stronger mitigation together with appropriately targeted Section 106 obligations to address its impacts on Holt Parish and the wider area.

1. Principle of Development and the Green Belt

Holt Parish Council objects to the principle of this application.

The site lies within the Green Belt and outside the adopted settlement boundary for Bradford-on-Avon. Settlement boundaries exist for a reason. They provide clarity about where development should normally take place and where the surrounding countryside should be protected. The Green Belt in this location performs an important function in maintaining the open countryside, separating distinctive historic settlements and preserving the distinctive landscape setting of both Holt and Bradford-on-Avon. Approval of a development of this scale would inevitably reduce openness and would make it harder to resist further speculative development around Bradford on Avon before the Local Plan has identified where growth should take place.

Holt Parish Council shares the wider concerns that have been raised regarding Green Belt policy, speculative development and the cumulative erosion of the Green Belt around Bradford on Avon. Rather than repeating those detailed planning arguments here, this representation focuses on the specific impacts that the proposal would have on Holt Parish and its residents.

2. Flood Risk, Highway Resilience and Cumulative Development

Holt Parish Council acknowledges the Environment Agency's position that the proposed built development is located within Flood Zone 1 and that floodplain land is intended to remain undeveloped, subject to appropriate conditions. However, Holt Parish Council considers that this addresses only flood risk within the application site itself. The wider planning issue is the

cumulative impact of continued major development within and adjacent to the River Avon floodplain upon an already constrained transport network.

Flooding is about far more than keeping new houses dry. It is also about whether existing communities can continue to reach schools, healthcare, work and emergency services. Roads serving Bradford on Avon, Holt and surrounding villages are very constrained and regularly affected by flooding. During flood events, access to employment, schools, healthcare, emergency services and neighbouring communities becomes difficult as routes are closed or heavily congested.

This application should therefore not be considered in isolation but as part of an increasing number of significant developments proposed around Bradford on Avon and within the Avon valley. Whilst individual developments may conclude that their own impact is acceptable, insufficient attention has been given to the cumulative consequences for the resilience of the wider highway network, both in normal conditions and during flooding events.

Holt Parish Council considers that Wiltshire Council and statutory consultees should give greater weight to:

- cumulative development adjacent to the River Avon floodplain;
- resilience of the local highway network during flood events;
- increased traffic on an already constrained road network;
- the ability of surrounding communities to access essential services during flooding; and
- the long-term cumulative effects of multiple speculative developments within the same catchment.

These concerns are supported by the emerging Holt Neighbourhood Plan Review. Holt Parish Council's Neighbourhood Plan consultation identified flooding as an issue extending beyond flood risk to individual properties. Residents reported that flooding affects access to services and can isolate parts of the community, while local businesses identified flooding and poor road access as significant constraints on their operations. These findings reinforce Holt Parish Council's concern that the resilience of the wider transport network, particularly during flood events, should be given greater weight when assessing the cumulative impact of further major development within the Avon Valley.

3. Sustainable Transport and Active Travel

Holt Parish Council considers that the application significantly overstates its sustainability unless accompanied by meaningful investment in active travel and public transport. A country park and leisure facilities, which are being proposed beside and within Holt’s parish boundary, are not accessible to Holt residents except by private car. Sustainable connections between Bradford-on-Avon and Holt are very poor. There is currently no continuous off-road walking and cycling route between Holt and Bradford on Avon, despite this being a longstanding aspiration supported by Holt Parish Council.

Infrastructure should be planned on the basis of how communities actually travel, rather than simply administrative parish boundaries. Given that a substantial proportion of the environmental mitigation relied upon by the application is proposed within Holt Parish, Holt Parish Council considers it entirely reasonable that Section 106 obligations should also provide appropriate mitigation for the impacts experienced by Holt Parish and its residents. Without

these improvements, Holt residents will continue to have little realistic alternative to using the car to reach facilities that the application presents as being sustainably accessible. Mitigation should therefore extend beyond the application site itself and address the wider infrastructure pressures created by development across this part of the Bradford on Avon area.

The emerging Holt Neighbourhood Plan demonstrates strong public support for safer walking and cycling routes together with improvements to public transport. Holt Parish Council therefore considers that developments of this scale should contribute not only towards site-specific infrastructure but also towards strategic transport improvements serving the wider area.

Should permission be granted, Section 106 obligations should include contributions towards:

- delivery of a continuous off-road walking and cycling route between Holt and Bradford on Avon;
- improvements to Public Rights of Way, including HOLT62 and connections towards the canal towpath, consistent with the recommendations of Wiltshire Council's Countryside Access Officer;
- improved bus services linking Holt, Bradford on Avon and surrounding communities; and
- integration with existing active travel projects already being promoted within Holt Parish.

Holt Parish Council has already secured developer contributions towards active travel infrastructure from speculative sites within the parish. Holt Parish Council considers that major developments both within Holt Parish and neighbouring communities should continue to contribute proportionately towards delivering strategic transport improvements where they place additional pressure on the same highway network.

4. Environmental Mitigation within Holt Parish

The application relies heavily upon the proposed country park, riverside access and environmental enhancements as part of the planning balance. Much of this land lies within Holt Parish. Holt Parish Council therefore considers that the application provides very little certainty about:

- long-term ownership;
- governance;
- maintenance responsibilities;
- biodiversity management;
- public access arrangements; and
- future funding.

Holt Parish Council is not persuaded that replacing existing agricultural land within Holt Parish with an engineered recreational landscape should automatically attract substantial weight as an environmental benefit. Existing agricultural land already contributes positively to openness, landscape character and the rural setting of Holt and Bradford on Avon. The long-term character and management of this land should be fully understood before planning permission is granted.

5. Healthcare Infrastructure

Holt Parish Council supports the response from the NHS Bath and Northeast Somerset, Swindon and Wiltshire Integrated Care Board, which concludes that there is insufficient primary healthcare capacity to accommodate the population generated by this development without

additional investment. The NHS advises that local GP practices are already operating with an overall floorspace deficit and that mitigation is required through a Section 106 contribution of £268,006 towards expanded primary healthcare facilities. In Holt, planning permission has been granted for 145 additional homes without any expansion of primary healthcare facilities. Holt Parish Council's own Neighbourhood Plan consultation demonstrates that access to primary healthcare is already a significant concern for residents, with 47% of respondents reporting that they struggle to obtain a GP appointment.

Holt Parish Council supports the NHS's request that adequate healthcare infrastructure is secured prior to the commencement of development. Existing communities should not experience a further reduction in access to healthcare as a consequence of major new development.

Should planning permission be granted, Holt Parish Council supports the full healthcare contribution requested by the Integrated Care Board and requests that it is secured through the Section 106 Agreement in accordance with the NHS response.

Conclusion

Holt Parish Council objects to this application.

The proposal represents speculative Green Belt development which has not been brought forward through the plan-led process and would contribute to the gradual erosion of the Green Belt surrounding Bradford on Avon.

Holt Parish Council is also concerned that insufficient weight has been given to the cumulative impact of major development within the River Avon corridor upon flood resilience, highway capacity and access to essential services.

Finally, while Holt Parish Council maintains its objection to the application, if Wiltshire Council decides to approve the application despite these objections, it should ensure that the Section 106 Agreement secures strategic improvements that benefit the wider area, particularly where the impacts of the development and the environmental mitigation relied upon in the planning balance extend into Holt Parish.

In particular, Holt Parish Council requests that Section 106 obligations secure strategic active travel improvements, enhanced public transport, Public Rights of Way enhancements, investment in community sports infrastructure, appropriate healthcare provision, and the long-term management of land within Holt Parish.