

FORMAL OBJECTION TO RESERVED MATTERS APPLICATION

Application Reference: PL/ 2026/02472

Land Rear of 117 High Street, Dilton Marsh, Wiltshire, BA13 4DP

Submitted to: Wiltshire Council, Strategic Planning Department

Date: September 2026

Introduction and Standing to Object

I am a resident of Dilton Marsh and a near neighbour to the application site. I submit this formal objection to the Reserved Matters application for 54 residential dwellings on land to the rear of 117 High Street, Dilton Marsh (LPA Ref: PL/2026/02472), submitted by Redcliffe Homes Ltd.

I wish to object to the Reserved Matters Application.

I recognise that the principle of development has been established through the earlier appeal decision. However, the Local Planning Authority must still be satisfied that the submitted details of layout, scale, appearance and landscaping constitute an acceptable form of development and comply with relevant planning policy and environmental legislation. In my view, the revised scheme continues to fail to do so.

Although amendments have been made since the original Reserved Matters submission, the revisions do not adequately address concerns regarding scale, residential amenity, ecological impacts, parking provision and the wider assumptions underpinning the proposed development.

1. Scale, Height and Massing Remain Excessive

Relevant Policies:

- NPPF Paragraph 135.
- NPPF Paragraph 139.
- Wiltshire Core Policy 57 (Ensuring High Quality Design and Place Shaping).

Whilst the applicant has removed the previously proposed 2.5-storey house types, this does not materially resolve concerns regarding the overall scale and massing of the development.

The revised dwelling types continue to contain:

- substantial ridge heights;
- steep roof pitches;

- unusually large roof volumes;
- a level of massing that remains out of keeping with the character of surrounding development.

The reduction in formal storey count appears largely cosmetic. The revised house types retain roof forms capable of accommodating substantial roof spaces and continue to present a building mass significantly greater than that typically found within Dilton Marsh.

The applicant's revisions therefore appear to reduce the nominal height classification of the dwellings whilst retaining much of the visual bulk that generated concern in the original submission. The revised roof forms appear deliberately designed to maximise roof volume whilst retaining a nominal two-storey classification. Consequently, the visual mass of the development has not reduced to the extent suggested by the removal of the former 2.5-storey house types. The resulting buildings remain substantially larger in appearance than much of the surrounding village housing stock.

Particular concern remains regarding the relationship between the proposed dwellings and existing properties along High Street forming the southern boundary of the site. The proposed development continues to introduce a substantial built frontage immediately behind long-established residential properties where no such development currently exists.

The revised scheme therefore fails to respond adequately to local character and continues to conflict with Core Policy 57 and the design objectives of the NPPF.

2. Harm to Existing Residential Amenity

Relevant Policies:

- NPPF Paragraph 139.
- Wiltshire Core Policy 57.

The revised layout continues to result in unacceptable impacts on existing residents along the southern edge of the site.

The applicant appears to rely heavily upon proposed landscaping to mitigate impacts on outlook and privacy. However:

- newly planted landscaping provides little meaningful screening at occupation;
- many years will pass before such planting becomes effective;
- planning decisions should be assessed on the relationship created by the development at first occupation rather than assumptions regarding future vegetation maturity.

The combination of the proposed building heights, roof forms and density of development will materially alter the outlook currently enjoyed by neighbouring residents.

The development continues to generate concerns regarding:

- visual dominance;

- loss of openness;
- perceived overlooking;
- overbearing relationships between old and new development.

These impacts are particularly important because the applicant's own landscape strategy is intended to mitigate them. If that landscaping is delayed, unsuccessful or constrained by infrastructure easements, the occupants of neighbouring properties will experience the full effect of the development for many years.

The application therefore fails to demonstrate that the amenities of neighbouring occupiers will be adequately protected.

3. Ecology, Bat Corridors and Protected Species

Relevant Policies:

- NPPF Paragraphs 193 and 194.
- Wiltshire Core Policy 50.
- Conservation of Habitats and Species Regulations 2017.

The ecological case for the development relies heavily upon mitigation measures intended to maintain bat activity and habitat connectivity, and the applicant's own Landscape and Ecological Management Plan (LEMP) confirms why this matters so much to the acceptability of the scheme.

The LEMP records that bat activity surveys undertaken in 2022 and 2024 identified greater horseshoe, lesser horseshoe, common pipistrelle, soprano pipistrelle, serotine, noctule and Myotis species using the site. Critically, greater and lesser horseshoe activity, both Annex II species under the Habitats Regulations, was concentrated specifically along the northern and western boundaries of the site. The LEMP further confirms that the site lies within the 4km buffer zone of a greater horseshoe "Core Roost" that is functionally linked to the Bath and Bradford-on-Avon Bats Special Area of Conservation, and that horseshoe bats are particularly averse to light.

Given this, the lighting strategy is not a peripheral consideration but a central plank of the scheme's ecological acceptability. However, the LEMP's own management proposals expose a significant gap. Responsibility for maintaining ecological infrastructure, hedgerows, dark corridors and habitat features is to sit with a private management company appointed by the developer, on an initial agreement of only five years. Beyond this, the LEMP addresses compliance in only one way: prospective buyers will be "made aware" of their legal obligations regarding bats and nesting birds. No mechanism is proposed for controlling or monitoring domestic lighting, security lighting, garden lighting or general changes made by individual householders across the 54 separate plots, nor is there any provision for what happens once the initial five-year management arrangement lapses.

The Council must therefore be satisfied not merely that ecological corridors and dark zones exist on plan, but that they will continue to function once the site is occupied, under real-world conditions of domestic lighting, vehicle movements and future alterations by individual owners, and beyond the limited period for which management arrangements are currently secured. The applicant's ecological strategy appears to assume ideal long-term compliance with lighting controls and management measures by 54 separate households. No evidence has been provided demonstrating how such controls can be effectively monitored or enforced in perpetuity. The ecological functionality of the site should therefore be assessed under realistic, occupied conditions rather than idealised design assumptions.

Given the protected status of the bat species involved and the legal duties that apply to European Protected Species, the Council should require considerably more robust and durable assurance than an awareness exercise directed at buyers before concluding that the proposed mitigation is adequate.

4. Fundamental Conflict Between Landscaping and Utility Constraints

Relevant Policies:

- Core Policy 57.
- NPPF Paragraph 135.

A significant concern arises from the apparent contradiction between the landscape mitigation proposed by the applicant and the utility constraints identified within the applicant's own engineering drawings.

The applicant relies extensively upon landscaping and open space to provide privacy screening, visual mitigation, ecological connectivity, bat corridor protection and the integration of the development into its surroundings. However, the Drainage Layout (drawing ref. 148009-MCS-XX-DR-C-5100) shows extensive 3-metre sewer easements running repeatedly through the site, including directly alongside and through the proposed SUDS attenuation basins, the online swale, and the open space and community orchard area. These are not incidental crossings at the margins of the site; they run through the very areas on which the applicant's mitigation strategy for privacy, ecology and visual impact depends.

The revised application does not explain how these two objectives are to be reconciled. The Council is effectively being asked to accept that substantial planting and soft landscaping will mitigate overlooking, visual impact and ecological harm, whilst the applicant's own drainage engineers have identified that significant parts of the same land are subject to easements that will, as a matter of course, restrict what can be planted, retained or allowed to mature above or adjacent to buried infrastructure.

This is particularly important because the applicant's response to concerns regarding privacy, visual impact and bat protection is heavily dependent upon the success of landscape screening in precisely these locations. If future access to the sewer network requires vegetation removal,

root barrier installation, pruning or replacement planting, the effectiveness of the proposed mitigation could be significantly and permanently reduced in exactly the areas where it matters most.

The Local Planning Authority should require clear evidence, agreed with the relevant utility undertaker, showing what planting can and cannot occur within the identified easements, how ecological corridors and bat commuting routes will remain functional where the 3-metre easement runs through them, and how privacy screening can be maintained throughout the life of the development. In the absence of such evidence, the deliverability of the proposed mitigation cannot be regarded as demonstrated.

5. Unrealistic Travel Plan Assumptions

Relevant Policies:

- NPPF Paragraph 116.
- Wiltshire Core Policy 60.

The submitted Residential Travel Plan (RTP) presents the development as highly sustainable and capable of achieving a significant reduction in private vehicle use. However, the assumptions underpinning the RTP are inconsistent with the reality of living in Dilton Marsh, and are not well supported even by the RTP's own evidence.

The RTP's own baseline data, drawn from the 2011 Census for the Wiltshire 039 Middle Super Output Area, records that 70.8% of residents currently drive a car or van to work. The RTP's stated ambition is to reduce this to 60% by Year Five, alongside more than doubling rail commuting from 3.1% to 6.0% and more than doubling bus use from 1.1% to 3.0%. No comparable scheme evidence or modal shift precedent is presented to justify targets of this scale.

The village contains very few day-to-day services capable of supporting a genuinely low-car lifestyle, a conclusion borne out by the RTP's own accessibility assessment. Its facilities table identifies no GP surgery and no post office within any recorded walking or cycling distance of the site. The nearest supermarket, a Tesco Express, is a 25-minute walk away; Aldi, at 3.1km, is not given a walking time at all, itself an indication that it is not considered a realistic walking destination. As a consequence, residents routinely travel to Westbury and beyond for shopping, healthcare, employment and many everyday activities.

The RTP identifies many destinations as being accessible by foot or bicycle. However, theoretical accessibility is not the same as realistic behaviour. The pedestrian environment within Dilton Marsh presents significant challenges. Footway provision is fragmented and inconsistent, with pavements frequently located on only one side of the road. Pedestrians are therefore required to cross the B3099 multiple times depending on their destination. In a number of locations the pavements are narrow and poorly suited to older residents, wheelchair users, those with mobility limitations and families with pushchairs.

The RTP therefore places excessive reliance on walking without adequately considering the quality, continuity and accessibility of the pedestrian environment.

The cycling assumptions are similarly unrealistic. The principal route through the village lacks dedicated cycle infrastructure and cyclists are required to share the carriageway with significant volumes of traffic. This is unlikely to be attractive to many potential users, particularly families and less confident cyclists. The existence of off-road cycle routes beyond the village does not address the absence of safe routes through the village itself.

Public transport provision is also limited. The nearest railway station offers services roughly hourly off-peak and provides no station car parking, while the bus services identified operate at best hourly, with the X47 service to Trowbridge running only twice a day on weekdays. As demonstrated by Census evidence from the area surrounding the site, bus, rail and cycle commuting are currently negligible.

The RTP therefore confuses theoretical accessibility with practical travel behaviour and substantially overstates the degree of modal shift that can realistically be achieved.

This is important because the parking strategy and layout appear to rely on those assumptions. If the anticipated reduction in private vehicle use is not achieved, parking demand will inevitably be higher than forecast, leading directly to the parking concerns outlined in Section 6.

6. Parking Provision Remains a Significant Concern

Relevant Policies:

- Wiltshire Core Policy 60.
- Wiltshire parking guidance.
- NPPF Paragraph 116.

The unrealistic assumptions contained within the Travel Plan have direct implications for parking provision.

The applicant's parking strategy appears to depend upon significant reductions in private vehicle use being achieved through the RTP. However, both local Census evidence and the RTP's own baseline data demonstrate that this assumption is unlikely to be realised in practice. 2021 Census evidence for the area surrounding the site demonstrates exceptionally high levels of car ownership. In the area immediately surrounding the proposed development:

- only 7.6% of households had no access to a vehicle;
- 41.2% of households had access to two vehicles;
- 14.9% of households had access to three or more vehicles

Across Dilton Marsh more generally:

- only 9.5% of households had no vehicle;
- more than 55% of households had access to two or more vehicles.

The same Census evidence demonstrates that:

- 56.2% of residents in the area surrounding the site travelled to work by car or van;
- no residents reported commuting by train;
- no residents reported commuting by bus;
- only 0.7% reported cycling to work.

These figures are drawn from the same Wiltshire 039 MSOA as the Travel Plan's own baseline, but reflect the more recent 2021 Census rather than the outdated 2011 dataset relied upon by the applicant. Although the overall proportion travelling to work by car or van appears lower in the 2021 data, this is consistent with the atypical rise in homeworking recorded nationally during that Census period rather than any genuine shift away from car dependency, and critically, that reduction has not been absorbed by any meaningful increase in active or public transport: train and bus use remain at 0%, and cycling at just 0.7%. The applicant's reliance on ten-year-old figures therefore understates, rather than overstates, the scale of car dependency the Travel Plan needs to overcome.

These figures demonstrate the reality of travel behaviour within Dilton Marsh and directly contradict the degree of modal shift assumed within the Travel Plan. Private car ownership within Dilton Marsh is therefore not simply a matter of preference but a practical necessity resulting from limited services and employment opportunities within the village.

Consequently, visitor parking demand is likely to exceed forecasts, on-plot parking may prove inadequate, pressure for overspill parking is likely to increase, estate roads may become obstructed, and parking may spill onto surrounding roads and pavements. Recent resident objections continue to raise concerns regarding visitor parking numbers and the likelihood of overspill parking, concerns entirely consistent with the local evidence on car ownership and travel behaviour set out above.

The Council should therefore assess parking provision on the basis of realistic local patterns of vehicle ownership and usage, evidenced by both the Census data and the applicant's own Travel Plan baseline, rather than on Travel Plan targets which the applicant's own evidence gives no reasonable basis to expect will be achieved.

Failure to Address Earlier Concerns

Whilst a number of revisions have been made since the original Reserved Matters submission, the principal concerns raised by local residents remain substantially unresolved.

The amendments largely adjust details of layout, landscaping and presentation. They do not materially address the underlying concerns regarding:

- scale and massing;
- privacy and amenity;
- ecological functionality;
- parking demand;
- car dependency;

- the relationship between the development and existing High Street properties.

The revised application therefore does not demonstrate that these important planning concerns have been adequately resolved.

Conclusion

For the reasons set out above I respectfully request that Wiltshire Council refuse Reserved Matters approval for Application PL/2026/02472.

The revised submission continues to fail to demonstrate that the detailed design of the development is acceptable and continues to give rise to significant concerns regarding:

- Scale, roof form and massing.
- Residential amenity and privacy.
- Bat corridors and ecological functionality.
- The conflict between landscape mitigation and sewer/utility easements.
- Unrealistic transport assumptions.
- Parking provision and likely overspill demand.

The revisions do not satisfactorily address these issues and approval should therefore be refused.