

## Wiltshire Council Planning Consultation Response

### URBAN DESIGN

**Officer name:** Peter Martin

**Date:** 9.7.20

**Application No:** 20/03641/OUT

**Proposal:** Outline application for up to 100 dwellings and a care home (Class C2 Use) of up to 64 beds (up to 3,750 sqm), as well as vehicular access from the A363. Matters to be considered: Access in to the site

**Site Address:** Land South of White Horse Business Park, Trowbridge, Wilts

**Case Officer:** David Cox

**Recommendations:** Withdraw or Object

### Context

1. This application has been submitted ahead of the approval of a masterplan for the wider area. Thus, an effective urban design assessment cannot be given yet as it is impossible for this outline to accord with a masterplan that is not approved.

Development will take place in accordance with a masterplan approved by the Council as part of the planning application process. The design and layout will take account of all policy requirements, including the timely and coordinated provision of necessary infrastructure to achieve a comprehensive development of the site.

*Policy H2.2*

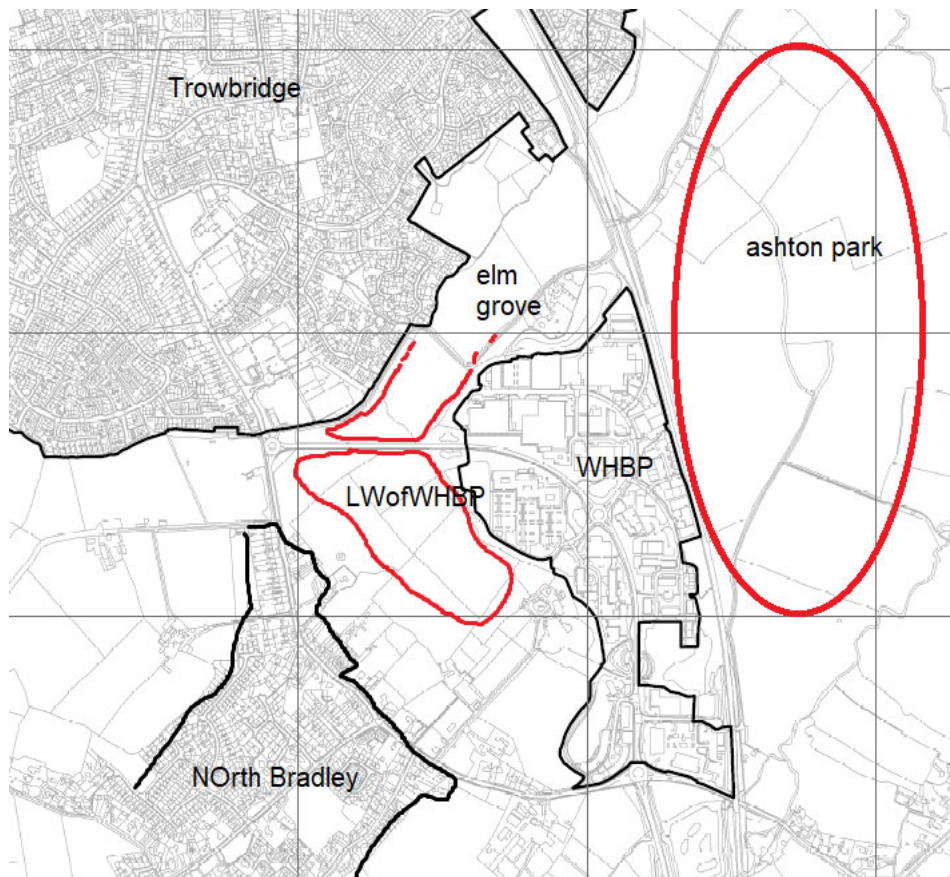
2. In any case, the "Wider Site Allocation Masterplan SK001" is inadequate in terms of detail. If that wider masterplan is to be assessed at this point, then I suggest a pre-app is done for it alone with a separate time frame reserved for this outline. There would also have to be evidence that all land controllers had signed up to it and the numbers and areas it should be specified.
3. As part of that discussion, a critical matter is what is the vision for the identity of new development around Trowbridge and whether it is to be a seamless continuation of Trowbridge, or part of North Bradley, or Part of a Business Park. I suspect it should unquestionably be the former since the site Policy (5.35 and 5.39) state;

*An objective of detailed design and layout will be to retain visual separation of the Town's urban area from North Bradley village....Proposals would need to provide for a high quality, sustainable development that enhances a key gateway approach to the town.*

4. This may need to be confirmed with Spatial Planning officers. The creation of a 'gateway' into the town will, in my view, require the change in the character of the A363 along this stretch, as it is currently a generic distributor road that significantly severs the allocated

land north and south of it and as such would not integrate with the extension of residential neighbourhoods across it.

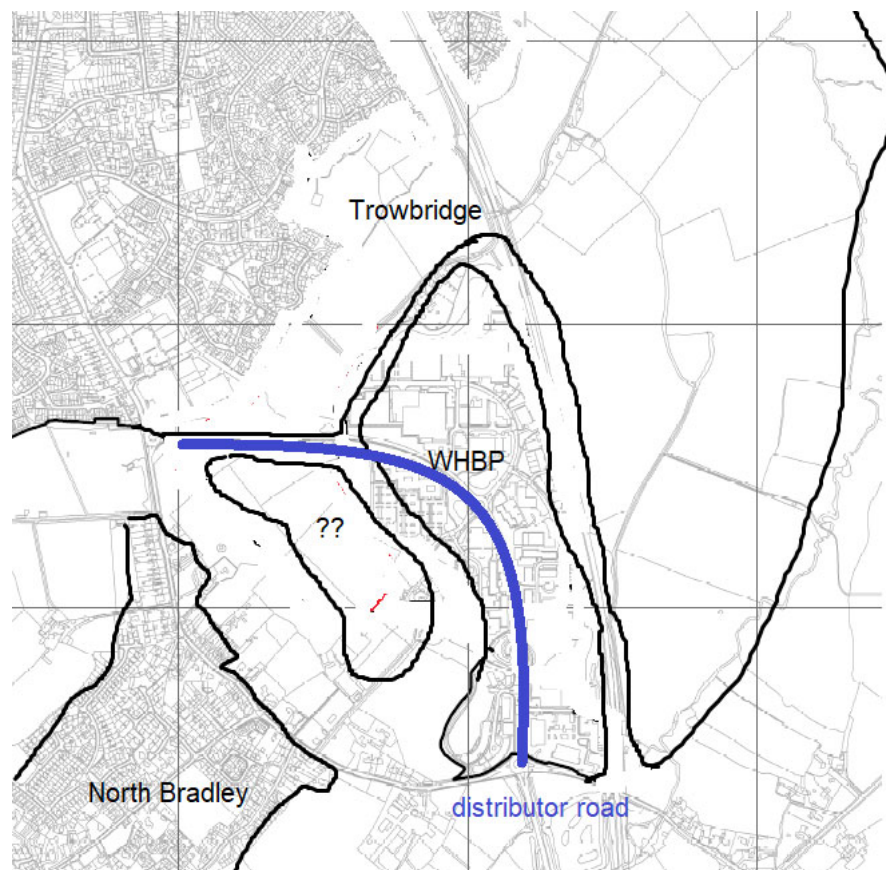
5. Having discussed this briefly with highways officers, it seems there could be constraints on completely changing it to match the character of the A363 as it currently exists within the settlement, but opportunities do exist. **This is an important discussion to have ASAP within the context of the Wider Masterplan noting that that masterplan needs to deals with land outside the applicants red lines:**



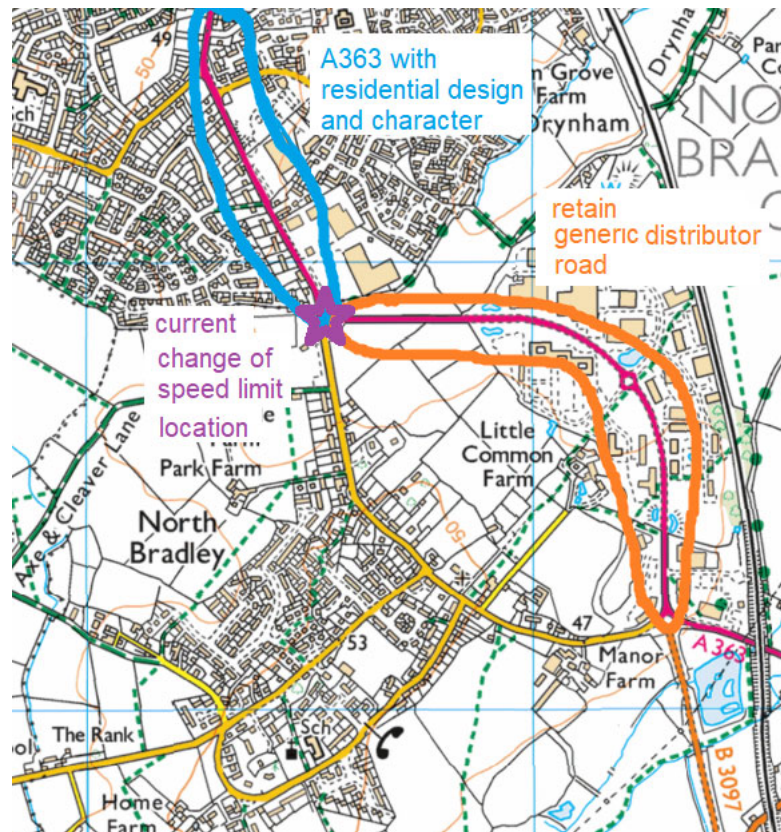
*Separate permissions/allocations*



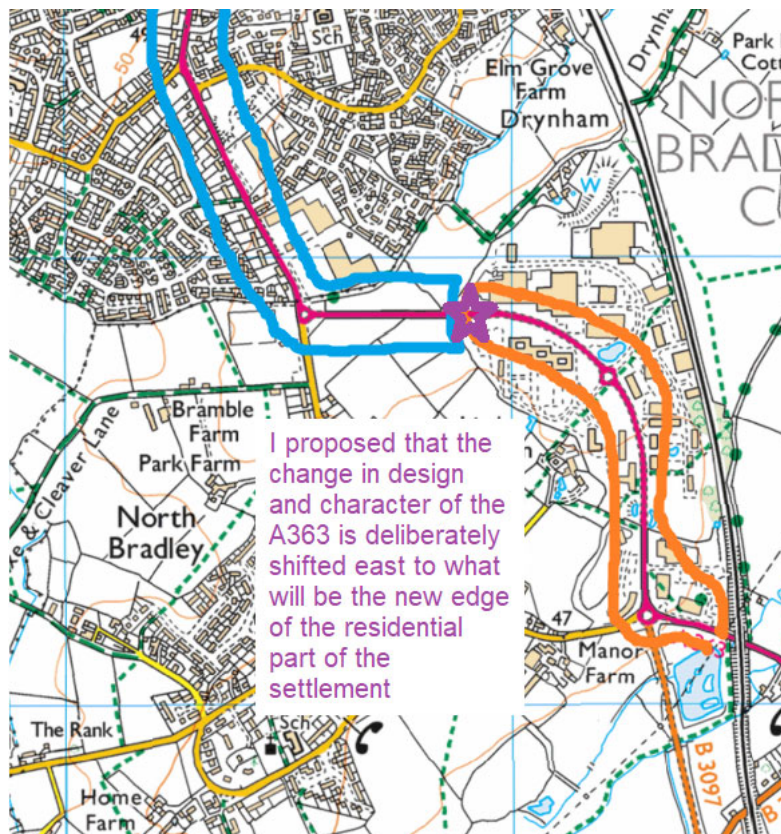
*New settlement Boundaries?*



*Disconnected place and ambiguous identify?*



*How current Masterplan neglects to address new gateway*



*How a revised masterplan could address need for a new gateway*

- Therecently updated Building for (a Healthy) Life (backed by the government's NPPF paragraph 129) is clear on the need for properly addressing this specific issue:

**Create places that are well integrated into the site and their wider natural and built surroundings. Avoid creating isolated and disconnected places that are not easy places to move through and around.**

**What's needed:**

- Look beyond the red line that marks the extent of your site. Ordnance Survey maps along with satellite mapping software such as Google Earth are useful tools to help you understand the wider context and how you can best stitch a new development into a place.
- Identify the places, facilities and services you need to connect to.
- Draw points of connection into and through your site - creating a strong and direct street, path and open space network.
- Create well-connected street and path networks, providing opportunities for these to be extended beyond the site boundary in the future.
- Research and respond to how water flows and nature moves across your site and the wider surroundings.

6. Notwithstanding the above in principle objection, I can share initial thoughts on the current proposal within the red line, but reserve the right to review them once the wider masterplan is approved.

### Amount

7. The sketch layout does not prove that 100 units fit in the developable areas, because only 90 dwelling are shown.



49 narrow semi-detached houses  
14 narrow terraced houses  
5 flats over garages  
22 detached houses

TOTAL = 85 houses + 5 flats

8. Other indicative details suggest that the site may not realistically deliver even 90 dwellings:

- There is not realistic parking shown for terraced typologies

- The homes along the main street are not set back far enough from this primary street which will have more car and pedestrian traffic and noise.
  - There is no realistic space for street trees / frontage landscaping along the main street.
  - There is no space for a continuous segregated cycle path running through the site.
  - The case home looks to be undersized – another application shows a home of only 44 suites requiring a similar amount of space as this. Indicative internal layout to be included. Parking numbers to be shown.
  - Many of the semi-detached houses look too small (narrow) to be 3 bed dwellings
9. The H2.2 site policy did not suggest that a care home was needed, and so I am initially concerned that there is no evidence of local need for it (or that it would be affordable to those that need it) and that it is unnecessarily reducing the amount of space available on this land to deliver other design ambitions/requirements.

### General Layout

10. To a large extent, the form of the developable area appears to be a direct response to an underground water pipe constraint rather than an obvious regard for the concept of avoiding visual coalescence:

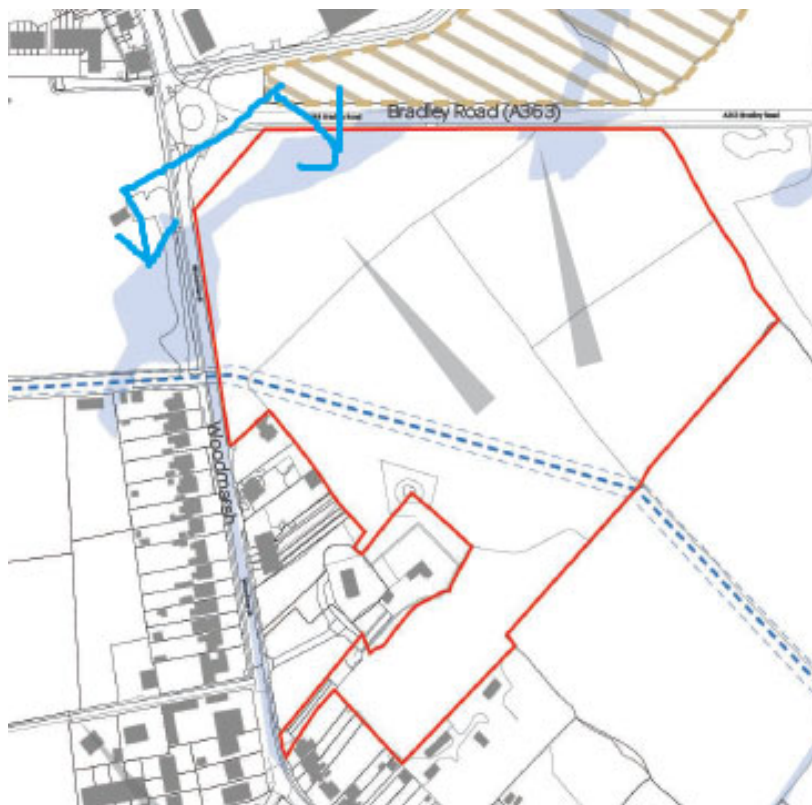


*How the development responds to the easement*



*how a visual 'gap' might be retained.*

11. To properly assess this matter, which is explicitly highlighted as important in Policy H2.2, I recommend an indicative sketch/model from the human level perspective of the site in 3D from the north, to assess how much coalescence there may really be:



*Indicative site views from key locations required*

12. I note that there is some flood mapping which may or may not be affecting the stated developable areas, because the forthcoming Elm Grove masterplan to the north appears to not be too constrained by it:



*Indicative development close to back highway on Elm Grove side (still under consultation)*

### Access

13. I note the highways officer is submitting detailed comments on the access and design speed constraints for the A363. The following comments approach the access from an urban design perspective. A holistic approach to the masterplanning is recommended.
14. For the scheme to be perceived as a continuation of the walkable settlement, and establish a new gateway into Trowbridge, and to assist in it achieving a design speed of 30mph, I believe the site should have a stronger active frontage along Bradley Road.
15. The Policy H2.2 vision would appear to justify some re-designing this road to be more like one *within* the town rather than one outside it, both in terms of its dimensions but also its setting/enclosure.
16. Following on from this line of thought, there is no obvious reason why it should be accessed by only one junction, or why it needs a right hand turn lane at all; Bradley Road to the north is enclosed by housing with individual private drives and has several residential through-streets branch off it that do not each have waiting lanes.

17. I would expect that inserting a waiting lane is designed to *maintain* uninterrupted traffic speeds, and so cannot see how this helps achieved the more desirable 30mph design speed for a road *within* a settlement and the safe crossing points that go with this.

18. The difference in A363 character, in pictures;



A363 Bradley Road – already functioning as a 30mph street within a settlement



*A363 Bradley Road – clearly an extra wide road that severs Trowbridge on the left from any future development on the right. Left like this it remains effective a distributor road, which is poor design and against the principles of Manual for Streets.*

19. There is clearly scope for this road to look and function differently and contribute to a more walkable environment with lower traffic speeds. I would hope that instead of a single access point into a ‘hidden’ development, the redesign could explore:

- Allowance for some private drives or driveways onto Bradley Road if it helps the layout.
- Fairly prominent active frontages parallel to the road.
- A build line set back of at least 5-10m from footways, behind private landscaping
- Solid, low, front boundary wall treatment.
- The thin grass verge should probably be removed
- A wider shared footpath/cycle way installed on one or both sides
- Driving lanes narrowed
- New bus layby included
- Potentially some on street parking bays included
- Large London Plane type street trees included on wider footway or between on street parking
- Footpath build outs at zebra/puffin crossing points to give pedestrians a priority crossing point.

**20. But all this really needs to be assessed in the context of the wider masterplan, not just this unilateral Outline. (I also notice that the right hand lane design to this site conflicts with that being designed for the Elm Grove site to the North, and I have expressed this concern to the highways officers for now)**

### Comments on the DAS

21. The DAS states: *“All other matters including layout, scale, appearance and landscape are reserved for subsequent approval”.*

However it rightly goes on: *“Parameters for the development proposals have been established and will provide the basis for reserved matters to come forward in the future, once the planning application is approved.”*

22. Thus, to demonstrate high quality design is achieved through the content and commitments of *this* outline (i.e. not simply shrug off all responsibility to a future applicant and create potential viability conflicts) the DAS and Parameter Plans should be assessed for how they propose to shape and commit to high quality design

“Land use p44”

23. Descriptions of formal and informal play are in the DAS but not on the Land Use Parameter Plan.
24. Hectare measurements in the Parameter Plan should distinguish SUDS, structural landscaping and Open space, Formal play space.

“Density p46”

25. The DAS does not demonstrate that there is any real control over how density ought to vary across the site at REM. The DAS states 25-40dph across the whole site which in theory could justify to as few as 67 homes or as many as 107 units. This could be so broad as to be ineffective as securing housing numbers or quality.
26. If there is to be a logical variation in density across the site, then this ought to be controlled with a range of densities that correspond to meaningful parts of the site. **This however should be done as an exercise within the establishment of the Wider Masterplan area, not piecemeal.**
27. I would want to see a table acknowledging the indicative typologies that are being used to achieved the target number of houses. The Mix (see point 7 above) does look reasonable to me, with a majority of semi-detached homes suggesting 3 beds, which are the highest priority house size. I want the outline to be transparent and publicise this fact to make it clear that this is the basis for any approval of the Amount. **The requirement for transparency and “clarifying expectations” is specifically mentioned in the NPPF (paragraph 128) and I think this is the best way to do that, and it will ensure that the permission retains this information for the benefit of any future REM applicant / officer.**

| Market indicator from the SHMA |    |        | indicative floor area   |
|--------------------------------|----|--------|-------------------------|
| Dwelling Size                  |    | %      |                         |
| 2b flat                        | 1  | <5%    | 61-70sqm?               |
| 2bed house                     | 4  | 5-10%  | 70-79sqm?               |
| 3bed house                     | 38 | 55-65% | 84sqm+?                 |
| 4-5bed house                   | 20 | 30-35% | 97sqm+?                 |
| TOTAL                          | 63 |        |                         |
|                                |    |        |                         |
| AH indicator from the SHMA     |    |        | note M4(2) & M4(3)needs |
| 1b flat                        | 3  | 12% ?  | 39-50sqm?               |

|             |    |       |           |
|-------------|----|-------|-----------|
| 2b flat     | 3  | 12% ? | 61-70sqm? |
| 2bed house  | 9  | 35% ? | 70-79sqm? |
| 3bed house  | 10 | 35% ? | 84sqm+?   |
| 4bed house  | 1  | 6% ?  | 97sqm+    |
| TOTAL       | 27 |       |           |
|             |    |       |           |
| GRAND TOTAL | 90 |       |           |

*Example accommodation table to be included with sketch test layout*

28. Furthermore, the layout must be plotted with realistic house sizes for it to be of any value; it should be colour coded with a table showing the indicative mix.
29. This should also help give local people confidence that what is approved at outline can be secured and a different owner and applicant at REM can be fairly held to account for it.

#### “Scale / Building Heights p48”

30. The suggested rule to limit heights to 2 storeys along the GI edges seems an arbitrary one; much of the edges will not be of an “open landscape character” – they will become linear public open spaces within a settlement area, and as such I see no obvious reason to not allow 2.5- 3 storey along some of these edges *if* it could use land efficiently and create more diversity of character. In particular I refer to the eastern edge, fronting the business park. The open countryside concept is really only valid between the development and North Bradley so limits might be included there.
31. The way the layout has been conceived, it is the care home which would appear most as if in an ‘open landscape’ setting and yet it is proposed as 3 storeys, which highlights the contradiction in the current approach. Though as per my comments on the layout, I think development in that area should more strongly relate to Bradley Road, so 3 storeys could work OK here. **Again, this is an issue best fixed within the wider masterplan exercise.**

#### “Movement p50”

32. Again, a more detailed masterplan for whole area is really needed before assessing this. I note this is important to the highways officer too.
33. This plan misses important information and none of it transmits to the Parameter Plan;
- Direct links to all the bus stop
  - Segregated cycle paths, cycle streets or otherwise, or details of min widths
  - All footways having links preserved through the boundaries to future paths
  - Pedestrian/cycle links to the business park and its employment
  - Recreational paths around the POS to match the extent shown on the sketch layout, and do not take in the ponds which ought to be conceived as amenity features.
  - Main street (function and character) needs to account for the fact that it will be serving many more homes in land to the south

- Cycle paths in parameter path to link to Elm Grove Site and North Bradley

#### “Street hierarchy p52”

34. The street sections or generic, and the sketch layout does not convincingly demonstrate the principles of them anyway, especially the issue of tree planting. The only difference between the different streets is whether a segregated footpath is included or not. Street materials/ footways materials, boundary treatments, setbacks, building forms – these all inform and enhance street hierarchy but none are discussed. Nothing is drawn from the observations of the Character Study.

35. I would expect to see the street character/hierarchy of the main street to include:

- Frontages to be set back farther from main street behind some landscape frontage
- Wider street to include allocated space for on street visitor parking
- Continuous build line but no continuous parking
- Tree lined
- Sense of formal composition perhaps with architectural theme along sections of the street.

36. Other streets might include a more informal mix of typologies and characteristics, but opportunities should still be taken to create distinctive spaces and streets.

#### “Landscape p54”

37. The central hedge does not appear to have been left with enough space alongside it to allow it to function as a continuous ‘corridor’ (i.e. movement route). Development should probably be pulled back from the edge and allocated path shown along the corridor to secure this concept:





38. The parameter plan omits the hedgerows and the sketch layout shows that when the SUDS basins are included, there is very little space to walk around the POS.
39. Extensive buffer planning will have a significant cost and so should be shown on a parameter plan, and dimensioned.

#### Drainage Strategy as component of Design opportunities

40. Some additional SUDs solutions could be explored too, to be efficient with space and add interest to the public realm, perhaps linear swales, SUDs tree pits etc. There are opportunities to stage SUDS across the site collecting surface runoff closest to source as opposed to putting them all in 'end of pipe' basins.
41. Indicative sections and detailing of SUDS should be included in the DAS to "*provide the basis for reserved matters to come forward in the future*" in accordance with the 4 pillars of SUDS.

#### Appearance

42. There are no actual conclusions from the local area character study. CP57 requires that it be shown how that analysis informs the Parameters Plans and DAS commitments.
43. For example, it is not clear what is a "*quality palette of materials*" nor how this outline proposes to secure it when a future applicant is in control of the land. The description is very broad and might justify something bland and homogenous.
44. The distinction expected of Key buildings needs defined, explicitly. Key buildings especially might be expected to draw on upon distinctive features identified in the local character study. Eg. Natural Stone facades and traditional boundary walls, bay windows, deeper set backs etc.

**End**