Wiltshire Council Planning Consultation Response

URBAN DESIGN

Officer name:
Brian Johnson Dip Arch
Senior Urban Design Officer
Wiltshire Council

Date: 28.11.2023 21.03.2024 Revised Plans (comment below in blue text) 01.07.2024 Further revised plans (comment in purple text) .

Application No: PL/2023/07797
Proposal: Reserved Matters Application pursuant of Outline Permission 19/05898/OUT (Outline application for up to 50 residential units, internal road, parking, open space and associated works, with all matters reserved other than access) relating to Appearance, Landscaping, Layout and Scale.
Site Address: Land off Park Road Malmesbury
Case Officer: James Repper

Reference:
'Case Files' on Wiltshire Council planning application webpage for PL/2023/07797
Case files indexed 26th Feb 24 and 27 Feb 24 on WC application webpage
Case Files indexed 7th June 24 on WC application webpage

Policy and guidance:
Wiltshire Core Strategy Core Policy 57 'Ensuring high quality design and place shaping', (abbreviated CP57)
Malmesbury Neighbourhood Plan Vol II - Design Guide (abbreviated MNP)
Building for a Healthy Life (Homes England 2020) (Abbreviated BfHL) (referenced as a tool in NPPF paragraph 133).
National Planning Policy Framework, July 2021

Objection Objection 21.03.2024 Revised Plans Objection 01.07.2024 Further revised plans

The layout and appearance of the development would not accord with the high standard of design and place shaping required by Core Policy 57 for the following reasons:

1) The regimented and strict axial arrangement of the streets and dwellings notably the rigid alignment of plots and dwellings and degree of uniformity in the form and appearance of dwellings in the street scene; including the repetitive appearance of a standard house type 1 to 6 on the slope facing Park Road and degree of common roof direction/gable ends to houses through the development (at the far ends of this street only roof to houses 21 and 42 orientated to run the length of the dwelling).

This would not reflect the '*rich tradition and variety of the town'* drawn on in MNP Task 8.12 or *diversity* drawn on in MNP Task 8.14 and was appropriately in principle avoided on the Site Layout in 19/05898/OUT which also indicated variety in orientation of roofs (see comparison extracts

below) Adjacent smaller development current application PL/2023/05471 Site Layout also shows variety in the above regard.

The revised site layout has significantly addressed these matters although it does convey a rigidity not shown on the 19/05898/OUT layout and as such retains the matters of objection relating to Layout explained in points 3 and 4 below.







Above left : 19/05898/OUT 'proposed 1 hectare Site Layout' drawing no (05)100 B.

Above right: PL/2023/07797 'Site Layout Plan' drawing no MALMW-MCB-ZZ-ZZ-DR-A-0230 D5-P1

Above far right : PL/2023/07797 ''Site Layout Plan' drawing no MALMW-MCB-ZZ-ZZ-DR-A-0230 D5-**P3**

Below ''Site Layout Plan' drawing no MALMW-MCB-ZZ-ZZ-DR-A-0230 D5-**P4**

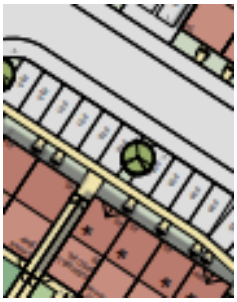


2) The rear parking courtyard serving houses 7 , 8 ,9 and 10 would be poorly overlooked backed onto by enclosed rear gardens and without planting poorly detailed as an expanse of hardstanding. This would represent 'what red looks like' in BFHL page 72/73 'whereas 'what green looks like' page70/71 advises *' small and overlooked parking courtyards ,with properties within courtyard spaces with ground floor habitable rooms .'* the approach essentially shown on the Site Layout in 19/05898/OUT directly overlooked by 'habitable' rooms enclosing these i.e. essentially a 'mews'. The layout would also not meet the requirement of MNP Task 8.25 as a 'mews', which indicates they would not be well designed as they would not be: *'… overlooked by adjoining houses or by buildings entered from the parking area'.*

✓ The courtyard has been deleted on the revised site layout.

3) The dropped kerb pavement running across the runs of end on car parking, across face of parking bay runs plots 12 to 17 and 21 -27 opposite would appear an excessive expansive of tarmacadam visually poor in the street scene (Example photo BFHL page 72 ' lower row of 'what red looks like'). This would encourage informal parking up across the ends of these bays, not least with an absence of visitor parking provision in this area, a concentration of parking to the detriment of the

street scene and amenity of pedestrians accessing the public open space. This pavement should at least be combined with the narrow path running across the face of the dwellings/rear of bays and bays brought up to the normal width road edge. Again, the Site Layout in 19/05898/OUT avoided such concentration of parking and expanse of hardstanding.



X Extract current site layout -this is still the case where car bays are shown end on to the street.

Pertinent also to this issue are paragraphs in Chapter 5 in the imminent publication of the Wiltshire Design Guide SPD and which the 19/05898 /OUT Layout would have addressed - *5.4.7 Where groups of homes are served with frontage parking directly off the highway, a continuous 1.8 m wide pavement should be provided between the build line/front doorsteps and the parking spaces, with returns at each end back to the adoptable highway.*



√ Satisfactorily addressed on further revised Site Layout Plan D5 -P4

The Layout also creates a visually awkward expanse of hardstanding with the squaring off to the outer side of the right angle bend in the street in front of plot 33, encouraging pedestrians to short cut into the road at this point and drawing emphasis to the parking stub ahead rather than the street/pavement attractively following round as on the Site Layout on 19/05898/OUT.



X Addressed but house 29 can only be accessed by surfaced path across parking bay between cars in bays which is a poor level of amenity - in conjunction with above matter path should connect up either side-with path and communal drive.

Meant 27/ 28 -i.e. simply extend path across front of 26 to connect up with path in front of bays P27,28 and extend through to communal drive

This street would also appear to be the vehicle means of access and road continuation into a potential significant extent of future development within the large expanse of remaining field open space beyond which would not be a welcoming route for pedestrians on this desire line in proximity, interacting with manoeuvring and informally parked vehicles which the similar access on Site Layout to 19/05898/OUT avoided end on parking along this street.

X Still the case - re my first paragraph in this point 3
√ Satisfactorily addressed on Site Layout Plan D5 -P4

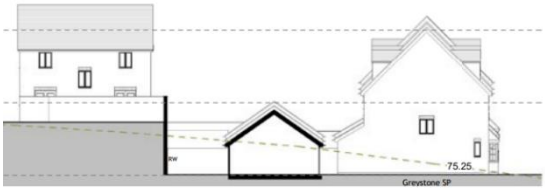
4) The Street scene Elevations (1-1 and A-A -extract below) indicate that the gable end of house 8 would appear overbearing and oppressive on the rear gardens and outlook from the plots notably from houses 1 and 2 in this proximity. A high timber fence proposed along the house 8 and the courtyard boundary with rear of plots 1 to 4 would not be suitably robust to maintain a lasting appearance and longevity and I question the soundness of topping the retaining wall with such an insubstantial structure given the considerable drop off from a vehicle manoeuvring area.

This would not appear a sensitive response to local topography and townscape characteristic of the town required by MNP Task 8.20 where such buildings would typically step up the slope in the street scene (as the 19/05898/OUT appropriately indicated with the housing as a stepped terrace

following up the slope.) or split level to accommodate this slope rather than plots cut deeply into this steep slope.

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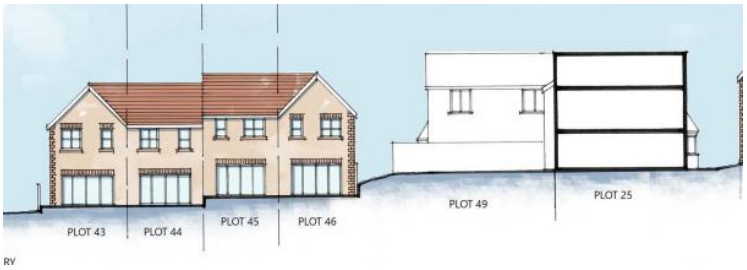




Above: Extract from : Revised street scene elevations AA (plot 1 right hand end). and from revised Section (now labelled Site section 1) .

X These revised drawings indicate this would still be oppressive and overbearing extent. The 'Site sections' on drawing DR A (05)101 on 19/05898 /OUT (extract below) showed how the houses in this area of the site could comfortably follow up the slope . A similar layout is necessary for this end of the site to achieve this.





Particularly pertinent also to this issue are paragraphs in Chapter 4 in the imminent publication of the Wiltshire Design Guide SPD and which the 19/05898 /OUT Layout and three dimensional design would appear to have addressed : -

4.1.2 The use of standard house types is unlikely to be suitable and bespoke designs are expected so that the development would integrate seamlessly with the landscape. Buildings and spaces should rise and fall more gradually with the land, in turn creating more interesting, characterful townscape and better living environments without the need for large retaining structures

4.1.3 Topography should not be overly reprofiled unless there is a demonstrable advantage in terms of coherence or function of the new place, as a whole. This would not include a desire to simply make it easier to utilise predesigned buildings

4.1.4 Height differences between plots within a site should be minimised, designing out the need for large retaining structures, especially those topped with fencing or walls.

4.1.6. On very steep sites, plots with a build line parallel to the contours should utilise split-level built form and split-level gardens. Plots perpendicular to contours should consider using traditional, narrowfronted stepped terraced housing.

The Addendum Design and Access Statement page 4 showed how the change in level along the rear boundary retaining structure has been reduced from that first submitted with the REM . The further revised Site Layout D5 -P4 has adjusted the line of this retaining structure with a relocation of the parking bays for plot 17 now not running directly alongside it. It is unfortunate the layout has not been changed in this area or split level houses introduced here, for example with integral garage.

5) The External Material Plan and D&AS 4.5 identifies 'Grey roof tiles TBC' MNP Task 8.19 '*Design of new buildings should incorporate roofing materials and patterns that complement the houses and buildings in Malmesbury's historic core area'* It says there is a preference for natural stone to be incorporated in new development and natural clay and natural slate are listed in the alternatives, whereas Concrete roof tiles are not. There are other recent development proposals in Malmesbury that have specified a Sandtoft natural clay traditional pantile (not uncharacteristic modern 'Double Roman' Pattern) and/or a reconstituted slate but avoided 'Concrete'. The application drawings should identify this. I have raised this issue also on the roof materials in my consultation response on current PL/2023/05471 for the development proposals adjoining the subject site. That development proposes red tiles throughout and this subject site grey tiles throughout. For quality of townscape setting with both developments seen and appreciated together from Park Road it would be beneficial if identical roof tiles could appear on both developments and with some limited variation in to show both ' red 'and 'grey' roofs to reflect the variety of the characteristic townscape drawn on in MNP Task 8.12 .

   Buff brick is proposed for garages and window heads and cills (D&AS 4.5) apart from the corner house 42 facing Park Road, whereas MNP Task 8.16 says this should be *limited use of red brick* and also *says brick dressings , string or band courses etc .are equally discouraged* whereas apart from house 42 facing Park Road, buff brick rather than cast stone is proposed for heads and cills.

X All of point 5 not addressed -no apparent change to any of the matters raised above (i.e. revised 'External Materials Plan' DR-A-0231 D5 -P3 only reflects the change in site layout).

First paragraph under point 5 part satisfactorily addressed: -

√ The further revised External Materials Plan DR-A-0231 D5 -P4 satisfactorily address the houses which are now key referenced as having roofs in reconstituted slate.

X however it is unfortunate given the expansive roofscape that some incidental variety is not introduced i.e. a clay pantile on a few of the houses where most prominent in the street scene and open space setting for example house 1, 9/10 ,13 and 17 say.

Second paragraph under point 5 part satisfactory addressed :-

√ – The further revised External Materials Plan DR-A-0231 D5 -P4 now satisfactorily part addresses with annotation identifying recon stone heads and cills , this also shown on the house type elevations where houses are faced in recon stone.

X However on D5-P4 pale buff brick facades have been introduced for houses now labelled 5 to 8 , 11,.12 , 19,20, 23,24 33 and 34 and all the garages are still identified in buff brick. A key intrinsic characteristic of the town and local rural area is the strong predominance of local stone facings with limited 'red' brick whereas this identity is under pressure from cumulative development proposals

making significant use of brickwork as opposed to reconstituted stonework facades (reflecting local stone in pattern ,size and colour) and a trend towards buff brick for its superficial resemblance to the local stone colour but buff brick is not a characteristic of the locality. Re CP57 I & iii , National Design Guide characteristics of 'Context' and 'Identity' and BfHL ' A memorable character ' page 46 /47 drawing inspiration from local architectural character.

6) The proposed open space corridor inside the site perimeter running to the rear of high boundary fences of rear gardens of plot 21 along round to plot 42 would permit informal access but would not be well overlooked and could give rise to potential misuse and security of plots. This should be shown secured with robust high gates /railings at each end to deter this access but allow for maintenance access only.

X Corridor now reduced down to barely scale 300mm width on Site Plan between existing boundary and proposed high fence to rear of gardens (extract below) This would appear inadequate for longevity and reasonable growth /spread of boundary hedgerow and access for practical maintenance of this. Presumably this hedge shown clearly on the 19/05898/OUT Site Layout along the boundary is an important feature, and space/access would be needed for it within the site.

√ Wide grass strip shown down rear of plots 31 to 40 between site boundary and high rear garden fences and gates at one end shown to secure this off from public access.



While in my consultation response I raised design matters on the Site Layout on 19/05898/OUT, these could have been addressed without the substantial change in the Layout to that now shown which raises additional matters of poor design as explained above. This essentially is still the case from the above review of revised drawings.
