

Wiltshire Council Planning Consultation Response

URBAN DESIGN

Officer name:

Guy Bridgewood BA (HONS) MArch PGDip ARB
Senior Urban Design Officer
Wiltshire Council

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Application No: PL/2026/01963

Proposal: Outline planning permission: All matters reserved for the residential development for up to 175 dwellings, associated works (including demolition), infrastructure, ancillary facilities, open space and landscaping. Construction of a new vehicular access off Coate Road and Windsor Drive.

Site Address: Land South of Coate Road, Devizes

Case Officer: Lucy Rutter-Dowd

Reference:

Drawings and documents indexed 03rd April on the Arcus application webpage including:

- Design and Access Statement (February 2026)
- 382.UD.11 Indicative Masterplan (Rev K)

Policy and guidance:

- Wiltshire Core Strategy, Core Policy 57 'Ensuring high quality design and place shaping' (Abbreviated CP57)
- Wiltshire Design Guide – Wiltshire Council Supplementary Planning Document adopted 25th March 2024 (abbreviated WDG)
- Any relevant 'Made' and not expired Neighbourhood Plan document. including often this as an Annexe /separate Neighbourhood Plan Design guidance document
- National Planning Policy Framework (MHCLG December 2024) (abbreviated NPPF)
- National Design Guide (MHCLG January 2021) (abbreviated NDG)
- Building for a Healthy Life (Homes England June 2020) (referenced in the NPPF) (abbreviated BfHL)
- Streets for a Healthy Life: A companion guide to Building for a Healthy Life (Homes England) (abbreviated SFHL)
- Devizes Area Neighbourhood Plan (Made July 2015) (abbreviated DNP)

Note: Proposed update to NPPF expected March 2026 and incorporation of NDG, NMDC Parts 1 & 2, and BfHL/SfHL in a 'Design and Place making Planning Practice Guidance' document (DPPPG) expected shortly also.

Wiltshire Council's Core Strategy Policy CP57 'Ensuring high quality design and place shaping': A high standard of design is required in all new developments, including extensions, alterations, and changes of use of existing buildings. Development is expected to create a strong sense of place through drawing on the local context and being complementary to the locality.

The examination of the emerging Wiltshire Local Plan has been paused and the weight to be afforded to any part of the emerging plan can be no more than very limited. A decision on how to proceed will be made by the Council in May 2026.

Observations

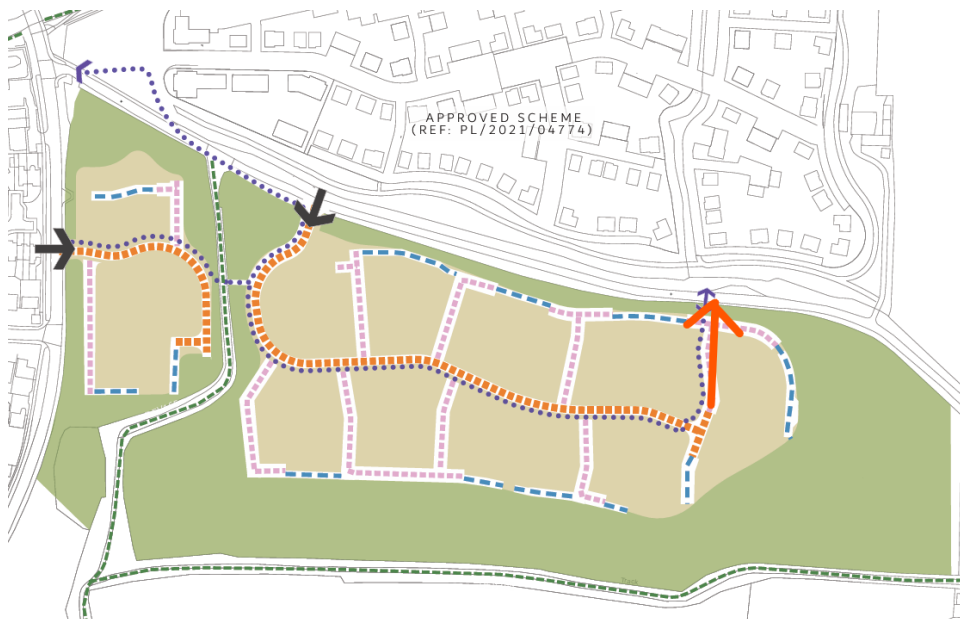
The site lies outside the Devizes settlement boundary (2020) and is not identified as a draft allocation in the emerging Wiltshire Council Local Plan (January 2023). It should therefore be considered a speculative site. At this early stage no detail or specific house designs have been submitted and my observations are therefore related to the layout in outline.

Objection

- 1) The proposed layout is overly reliant on cul-de-sacs, creating dead ends where turning heads and far ends are not visible from the junction with Coate Road. This is contrary to the Wiltshire Design Guide (WDG 5.1.8), which states that cul-de-sacs should be short and have their far end visible from a through-road junction.

This approach would also conflict with Core Policy 57 (vii) and (ix), as it would undermine legibility and accessibility. The reliance on vehicle reversing and turning at the ends of cul-de-sacs to serve dwellings and refuse vehicles, together with the proliferation of communal bin collection points, has the potential to create avoidable inconvenience for residents. Such an arrangement aligns with *Building for a Healthy Life* examples of “what red looks like” (pp. 18–19), rather than the preferred “what green looks like” (pp. 16–17), which advocates well-connected streets at the edges of developments. The cul-de-sac-led structure also undermines the ability of the proposed street network to function as a clear and legible hierarchy, as primary and secondary routes frequently terminate rather than forming connected through-routes.

To comply with the WDG and Core Policy 57, the main route should reconnect back to Coate Road, removing the long cul-de-sac and improving legibility and permeability. Please see screenshot below. If this is not feasible then an internal loop should be formed.



- 2) The proposed street hierarchy is not convincingly demonstrated. The layout relies heavily on curvilinear streets, which reduce clarity and contribute to disorientation. As set out in *Building for a Healthy Life* (pp. 57–61) and WDG 4.2 and 5.1, legibility is best achieved through straighter, more direct streets. Devizes has a clear local precedent for this approach, for example Victoria Road, which demonstrates straight through-routes contributing to attractive and legible streets. The immediate local context of Windsor Drive should not be used as a design precedent. Straighter streets would also allow clearer sightlines from the Public Right of Way (PROW) and pedestrian path junctions, reinforcing intuitive wayfinding. Please see screenshot below.



Although the Design and Access Statement describes a hierarchy of primary, secondary and tertiary streets, this is not clearly expressed in the indicative masterplan, where routes of similar width, alignment and enclosure perform different roles. The avenue trees are welcomed however trees should not be limited to the avenue alone and are encouraged on all the streets unless there are clear justifiable reasons why this would be inappropriate. Please see NPPF section 136. It is worth noting that the preference is also for trees in the public realm and not private front gardens.

More information is required to demonstrate the streets contributing to the character and place in accordance with WDG section 5 Movement or BfHL 'what green looks like' pages 52/53 and pages 64/65, 'Well defined streets and spaces' and 'Healthy Streets'.

- 3) BHL (p.17) discourages extensive use of private drives, which can frustrate pedestrian and cycle movement, particularly along site edges. Furthermore, the current layout does not adequately respond to pedestrian desire lines. To avoid frustrating pedestrian users, private driveways should connect, this could be for pedestrians only and not vehicles but clear legible sightlines should be present. See also SfHL Edge Lanes/Private Driveways (page 53).
- 4) There is no direct pedestrian connection to the public right of way to the south. As a result, pedestrians must either walk along Coate Road (a national speed limit road) or detour northwards through the site and back round on to the PROW where the pedestrian and cycle route crosses it. A direct pedestrian and cycle connection at the south-eastern corner should be provided to encourage active travel and improve access to the PROW and destinations to the east, including the Brownie and Guides Hut.

While the indicative masterplan shows a potential pedestrian and cycle link across Coate Road, this currently appears to lead toward a private drive/the frontage of a dwelling on the northern side. Connections should be planned holistically, having regard to the approved development to the north, to ensure legible, coherent and well-overlooked links between the two schemes.

Preference would be for this crossing to be located where it could connect to a movement corridor within the northern development.



- 5) Both *Building for a Healthy Life* and the Wiltshire Design Guide (Sections 6.3 and 6.5) expect sustainable drainage to be integrated into streets and open spaces as multifunctional green and blue infrastructure using a combination of wetlands, rain gardens, small ponds, and permeable surfaces, rather than appearing as isolated or engineered features. At present, it is unclear how SUDS will meaningfully contribute to placemaking or street character.

The pumping station is located at the main entrance to the site, which represents a poor townscape response for a key gateway and risks undermining the sense of arrival.

The pumping station should be relocated away from the principal entrance. If this is not feasible, clear reasoning must be provided and detailed information on its scale, enclosure, materials and landscape treatment should be secured at outline stage to demonstrate that it will not detract from the character or legibility of the entrance.

Introducing greater multi functional landscape areas into the development would help improve legibility by creating a break in the streetscape and allowing for framing of views. This would also be an attractive landscape feature to orientate houses around, please refer to p57 of BfHL.

The scheme indicates a small central open space; however, this appears remote from many of the new residents and not well-overlooked. Its scale and enclosure are unlikely to encourage activity, play or social interaction. This aligns more closely with BfHL red examples of poorly performing incidental spaces, rather than the preferred green approach of well-overlooked open spaces that contribute to legibility, neighbourhood identity and encourage activity.

It would be preferable for the smaller play area to be located to the east part of the development with a link to the larger play area provided across DEV165 from the western dwellings.

See below example in Castle Cary of a scheme which organises homes around landscape spaces to help define two separate areas of the development which are recognisably different.



The provision of woodland planting along the southern and eastern boundaries is welcomed in line with Wiltshire forming part of the newly established Western Forest, a National Forest initiative that aims to significantly increase canopy cover across the region. The objectives of National Forests are a material planning consideration under NPPF (2024) paragraph 152.

- 6) The masterplan should make more use of landscape to create interesting focal points, particularly at the end of streets or cul de sacs. WDG points 5.2.7 and 5.2.8 notes the importance of adding interesting and attractive focal points, this could be a significant tree, or artwork. The view to the PROW and woodland planting is welcomed however this is the same view for five streets therefore consideration should be given to add variety here which will aid legibility and a sense of place. This could also be supported by creating north-south green links incorporating street trees and SUDS at street level in line with point 2.
- 7) The layout raises concerns in relation to the Building for a Healthy Life “Back of pavement, front of home” principle. In several locations, homes appear to not show a considered space in front of homes, with a strong boundary treatment and opportunity for integrated storage, ie cycle waste or utility. The scheme appears to align with ‘what red looks like’ p85 of BfHL. Precedent image on p46 of the Design and Access statement is exactly what should be avoided.
- 8) Although the Design and Access Statement refers to perimeter block principles, the indicative masterplan presents a fragmented arrangement of individual dwellings rather than coherent blocks defining streets and spaces. This risks weakening enclosure, natural surveillance and the clear definition of public and private realms, contrary to WDG 4.2.5 and BfHL ‘Well defined streets and spaces’. A coherent street hierarchy would help create well defined streets in line with BfHL.
- 9) Key building locations are identified on the indicative masterplan; however, there is insufficient clarity in the DAS or other information that would secure their scale, form, massing, and architectural quality. In the absence of defined controls, it is unclear how these buildings would achieve a genuinely significant or landmark role. This does not yet accord with BfHL guidance on ‘A Memorable Character’, which emphasises the importance of clearly articulated focal buildings and spaces, nor with the Wiltshire Design Guide expectations for destinations, landmarks and focal points, which require landmark buildings to be defined through their form, setting and contribution to legibility.

The scale, form, massing and architectural character of these key buildings should be presented to ensure they are fit for purpose as a key landmark building in the locations suggested. This

could be controlled through appropriate parameter(s) plans. Worth noting the Devises Neighbourhood plan also notes that 'Design and Access statements for new developments should demonstrate how they will reinforce the character of the area.'

Conclusion

Currently the scheme does not meet the high standard of design and place shaping required by Core Policy 57, Wiltshire Design Guide or Building for Healthy Life. The scheme's reliance on cul-de-sacs, curvilinear streets and private drives undermines legibility, connectivity and pedestrian priority.

Currently landscaping is an afterthought on the periphery of the site. The scheme should be reconsidered to bring landscaping into the design at street level which would be beneficial to the sustainable urban drainage systems and improve user legibility.

Limited information is provided at outline stage on built-form parameters, massing or character. In the absence of clearer urban design parameter(s) plans, there is insufficient certainty that the reserved matters stage would deliver development that responds positively to local character. I would however draw the applicant's attention particularly to the WDG section 4.0 Built Form and BfHL Distinctive Places 'what green looks like' for development proposals.