

Wiltshire Council Planning Consultation Response

URBAN DESIGN

Officer name:

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Application No: PL/2026/01555

Proposal: A reserved matters application (appearance, layout, scale and landscaping) for 229 dwellings and associated infrastructure – Reserved Matters pursuant to Outline permission PL/2023/11188 Land at Blackmore Farm,

Site Address: Land at Blackmore Farm, Sandridge Common, Melksham SN12 7QS

Case Officer: Steven Sims

Reference:

Drawings and documents indexed 27th March to the 1st April on application webpage.

Policy and guidance:

- Wiltshire Core Strategy, Core Policy 57 'Ensuring high quality design and place shaping' (Abbreviated CP57)
- Wiltshire Local Plan Review - Pre-Submission Draft 202-2038 (Regulation 19) (September 2023) (abbreviated WLPR)
- Wiltshire Design Guide – Wiltshire Council Supplementary Planning Document adopted 25th March 2024 (abbreviated WDG)
- 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)

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 Outline Planning Application (ref: PL/2023/11188) lacks an approved Illustrative Masterplan or Design and Access Statement, which are essential for demonstrating compliance with design principles. The Pre-application response date 3rd February 2026 stated that in support of any application the following will also be required -

- A comprehensive Masterplan, phasing and delivery strategy as well as a Design Compliance Statement or Design Guide/Code within the Residential RM (Phase 1-3) list submitted with the Enclosure 1 – Validation List

Furthermore, we would refer the Applicant to the Design West Design Review Panel comments provided during the Outline Planning process in particular “Given the undefined nature of the parameters applied for, the first RMA will have to evidence the design of a masterplan of high quality in terms of WCC’s design guidance...”

No comprehensive Masterplan has been provided as part of this application.

The Applicant should have regard to the Urban Design and Design West Design Review Panel comments issued as part of the outline planning process, which are referenced in this report.

Objection

Layout

- 1) Plot 1 is shown as a Hampstead-type dwelling facing north, resulting in a poorly configured entrance to the development. The side elevation, containing only a single small first-floor WC window, would present an inactive and uninviting frontage. This elevation would fail to create an attractive feature along the primary street and would not provide an appropriate focal point when viewed from the secondary street.

Design guidance indicates that greater sensitivity is required at this key gateway location. The outline Design and Access Statement (DAS) identified a group of buildings addressing the primary street in this position and forming a strong vista when viewed from the secondary route.

Similarly, Plot 70, with its side garden abutting the Arrival Green, does not provide an active or attractive edge to the public realm. This results in a weak relationship with the key open space. Dwellings should instead address the Arrival Green with active frontages, rather than presenting side boundary treatments, to enhance enclosure, surveillance, and visual interest.

Recommendation: Plots 1 and 2 should be reconfigured to provide a more appropriate response to the gateway setting. The preferred solution would be a group of 2½-storey dwellings or apartments addressing the primary street, with parking located discreetly to the side or rear.

Particular regard should be given to Wiltshire Design Guide (WDG) expectation 4.2.8, which states that *“where buildings are on a corner, both public elevations should be designed as frontages and include windows from habitable rooms.”* This principle is especially relevant in this visually prominent location. (See note 12)

In addition, the “Arrival Green” should be designed as a coherent and unified space (see notes 10 and 11). Plots 70 to 73 should be reconfigured to address the ‘Arrival Green’ with discrete parking to the side or rear. Plots 182–185 should be repositioned to provide a clear focal point within the entrance vista, with parking similarly arranged to the side or rear. Increasing these units to 2½–3 storeys would align with the building height parameter plan and help establish an appropriate landmark at the entrance to the development.

- 2) In some locations, frontage car parking dominates the public realm, significantly limiting opportunities for meaningful landscaping and reducing the quality of the pedestrian environment. This approach reflects the 'red' examples in *Building for a Healthy Life* (BfHL, pp. 72-73), where car-dominated layouts result in weaker streetscapes. It conflicts with the 'green' principles (pp. 70-71), which promote greener, healthier, and more visually attractive street environments and should therefore be reconsidered.

Recommendation: Frontage parking is generally mitigated through the provision of green relief spaces at a minimum rate of one planting bay for every four parking bays, however, where frontage parking is arranged in groups and footpath widths fall below the required minimum of 1.8 m, as set out in WDG Expectation 5.4.7, additional planting should be provided to the rear of parking bays to protect pedestrian comfort and improve the public realm.

- 3) Generally, the edge condition on both sides of the retained hedgerows running through the centre of the site is formed by turning heads and private drives, with frontage car parking dominating the street scene. This approach reflects the outcomes described as 'red' in *Streets for a Healthy Life* (SfHL) (pages 58-59), where vehicle-dominated environments undermine street quality.

In contrast, the preferred 'green' approach set out in SfHL (pages 52-57) promotes continuous edge lanes with parking discreetly located to the side or rear. Such an arrangement would represent a more sensitive and contextually appropriate response to the retained hedgerow.

Furthermore, the current layout results in the rear gardens of Plots 104 and 105 forming the primary interface with the internal streets along the hedgerow edge. This would neither create an attractive street frontage nor provide appropriate privacy, exposing private rear gardens to the public realm.

Recommendation: The turning heads and private drives should be replaced with a connected edge lane running alongside the retained hedgerow. Plots 98 to 103 should be reconfigured to accommodate parking to the rear, thereby establishing a well-defined focus to the edge lane along the northern side of the retained hedge.

- 4) In accordance with WDG expectation 9.2.2, which requires that garden areas be at least equal to the footprint of the house, it is noted that a few plots do not meet this standard. This shortfall should be addressed to ensure adequate private amenity space and compliance with design guidance.

Recommendation: A garden sizes plan should be submitted clearly identifying which plots meet, and which fail to meet, the required standard, to enable a thorough assessment.

Scale

- 5) As illustrated in Street Scene A-A, plots 118 to 121, at 2½ storeys, appear visually dominant within a street that is otherwise characterised by 2-storey development. This results in a discordant streetscape that is not reflective of the prevailing built form.

Taller dwellings of this nature would be more appropriately located at key points within the layout, such as gateway locations, the termination of internal vistas, or adjacent to principal areas of open space, where additional height can serve a clear spatial and visual function.

Recommendation: Consider reallocating plots 118 to 121 to locations with greater strategic importance within the spatial hierarchy, and replacing them with 2-storey dwellings that better reflect the established character of the street.

Landscaping

- 6) The proposed attenuation basins appear as simple grassed depressions with an engineered character, lacking the naturalistic qualities expected of integrated landscape features. This design presents a poor visual impression, and does not meet the expectations of CP57 (ii).

In accordance with WDG expectations 6.3 and 6.5, attenuation features should be designed to blend into the landscape, avoiding the appearance of artificial depressions. A more appropriate approach would distribute water volumes across the site using a combination of wetlands, rain gardens, small ponds, and permeable surfaces.

Incorporating these elements at the plot and street level would not only enhance the visual quality of the development but also ensure the drainage strategy aligns with local design guidance and contributes positively to the site's character.

Recommendation: Revise the drainage strategy to ensure full compliance with DEFRA SuDS National Standards (June 2025) and align with WDG expectations for green and blue infrastructure. Incorporate BfHL principles by introducing naturalistic features such as rain gardens, swales, and wetlands at the plot and street level to enhance visual quality, biodiversity, and site character.

- 7) Tree-lined streets are a fundamental component of high-quality urban design and are strongly advocated by national and local guidance, including the National Planning Policy Framework (NPPF), Building for a Healthy Life (BfHL), and the Wiltshire Design Guide (WDG). The incorporation of street trees, layered landscaping, and Sustainable Drainage Systems (SuDS) contributes to well-defined, visually cohesive, and healthy streets and public spaces.

Within the submitted layout, the primary and secondary routes are generally characterised by a tree-lined verge along one side of the carriageway. However, notable exceptions occur between plots 106 -111 and 17- 24, where continuous street tree planting is absent. In the case of the route serving plots 17 -24, the alignment appears capable of facilitating a future connection to adjoining land, as envisaged by WDG paragraph 5.1.9. In the absence of an agreed comprehensive masterplan, however, the function and long-term role of this route remain unclear.

Furthermore, a number of lower-order streets do not include street trees. This approach conflicts with the expectations of NPPF paragraph 136, which promotes high-quality, well-designed places that create a strong sense of place and integrate nature into streets and neighbourhoods. The absence of trees on these streets risks weaker street character, reduced environmental benefits, and poorer overall placemaking outcomes.

Recommendation: To ensure compliance with the NPPF, BfHL, and the Wiltshire Design Guide, all new streets - including lower-hierarchy streets - should incorporate appropriate street tree planting. To safeguard their long-term retention, management, and contribution to the public realm, street trees and associated landscaping should be located within communal, publicly managed areas rather than within private plots, as currently proposed along several internal streets.

- 8) It is unclear from the submitted information whether the proposed landscape buffers/ecological corridors along the site boundaries adjoining the rear gardens of existing dwellings are intended to be publicly accessible or gated to restrict access. Unrestricted public access in these locations could result in security and privacy impacts for neighbouring and new residential properties.

Recommendation: Where landscape buffers/ecological corridors adjoining residential boundaries are intended to be gated or otherwise access-restricted, this should be clearly indicated on the submitted plans.

- 9) While the Site Layout introduces orchard trees at the site entrance to help soften views towards Blackmore House and Farm, it does not make full use of opportunities for more comprehensive woodland planting - particularly within the southern and eastern areas and the Hub. Wiltshire lies within the newly established Western Forest, a National Forest initiative aimed at significantly increasing canopy cover across its area. The aims and objectives of National Forests are a planning consideration under NPPF (2024) paragraph 152.

Recommendation: To support the objectives of the Western Forest and comply with NPPF paragraph 152, the development should include extensive woodland planting to the south and east, creating a stronger landscape buffer and contributing more meaningfully to long-term canopy enhancement.

Appearance

- 10) Character is described within the Design Compliance Statement as having been established through the preceding Design and Access Statement, which identifies two broad character areas. However, it is considered that character should be more directly informed by the street hierarchy and the identification of key routes and spaces.

In this regard, the inclusion of an additional 'Arrival Green' character area is welcomed, as it helps to reinforce a sense of arrival and hierarchy within the development.

There remains an opportunity to further strengthen the legibility of the scheme by extending the material approach associated with the 'Arrival Green' along the primary route. This would better emphasise the importance of this route within the overall street hierarchy and contribute to a clearer and more coherent character structure.

Recommendation: Enhance the legibility and character of the primary route by incorporating reconstituted stone on dwellings fronting this route.

- 11) Low stone front boundary walls are a defining feature of the historic character of this part of Wiltshire and are particularly prominent along Sandridge Common and other historic local streets. Their incorporation within the Arrival Green and along the primary route would reinforce local distinctiveness and help integrate the proposed development sensitively within its established context, in accordance with national and local design guidance.

Recommendation: Strengthen the character and sense of enclosure of the Arrival Green and primary route through the inclusion of low stone boundary walls at key entrance points and along the frontages of dwellings.

- 12) Some street/street corner return elevations and street/open space corner return elevations have attractively placed and proportioned windows utilising house types that are consciously designed for this purpose (Moresby, Amberley, Shaftesbury, Overton and Ennerdale for example), but there are the following exceptions below. These would represent 'what red looks like' BfHL (pp 54-55) rather than the preferred 'what green looks like' (pp 52-53), and WDG expectation 4.2.8. *'Where buildings are on a corner both public elevations should be designed as 'frontages' and have windows from habitable rooms in them'*.

- Hampstead - has a first floor WC window only
- Warwick - has a first floor WC/Hall window only
- Stour - has no side windows. Blank gables to the public realm are unacceptable
- Trent - has no side windows. Blank gables to the public realm are unacceptable
- Stratford – has a first floor ensuite window only

- Oxford - has a ground floor WC window only. Preference would be to flip this dwelling so that the ground floor habitable rooms and first floor bedrooms could provide windows to the side elevation.
- YB52 – although this has side windows these are not arranged as a ‘frontage’.

Recommendation: In order to comply with WDG 4.2.8, the return elevations of the above house types should be redesigned as active and attractive frontages, with habitable room windows provided. This approach would improve the visual quality of the proposed development and strengthen natural surveillance of the adjoining public realm.

Materials

- 13) WDG paragraph 9.3.5 states that “the interface between a private rear plot boundary and an adjacent public or shared space (including highways, public open space (POS) and parking courts) should generally use robust masonry walls or decorative metal or timber railings, as opposed to close-boarded or panel fencing.”

The submitted Materials Plan does not accord with this expectation, as it indicates fencing along some interfaces including plots 17/36, 37/51, 164, and 125. This form of boundary treatment is not considered appropriate where private rear gardens adjoin public or shared spaces and fails to meet the design expectations set out within the WDG.

In addition, it is preferred that side plot boundaries Arrival Green - and primary route (see note 10) - are formed by stone walls, reflecting the material proposed for the main dwellings.

Recommendation: To ensure compliance with WDG paragraph 9.3.5, all boundaries interfacing with public or shared spaces should be revised to comprise robust masonry wall treatments, with the Materials Plan amended accordingly.

- 14) As focal buildings, the apartment blocks for example, although well designed and proportioned, should be constructed in re-constituted stone to accord with WDG paragraph 3.1.10.

In addition, substations - particularly the substation within the Arrival Green - should also be finished in re-constituted stone, in line with WDG paragraph 7.1.11.

Recommendation: In order to better blend with and enhance the character of the local area all focal buildings and substations should be constructed with re-constituted stone.

- 15) The Site Layout Plan indicates a variety of surface materials aligned with the proposed street typologies, with tables, parking bays, shared surfaces and private drives shown in distinct colours or materials in accordance with Wiltshire Design Guide (WDG) Expectation 5.6.1. However, the External Works sheets specify all surfaces as Tarmacadam, resulting in extensive areas of impervious surfacing. This approach reflects the “red” solution shown in *Building for a Healthy Life BfHL*, pp. 72-73), rather than the preferred “green” approach illustrated on pages 70-71. Further guidance within *Streets for a Healthy Life* (SfHL) also encourages varied surface treatments to create attractive, safe and legible street environments.

Recommendation: To address this discrepancy, parking bays, traffic-calming tables, shared surfaces and private drives should ideally use permeable block paving. This would provide a clear visual contrast with Tarmacadam, enhance character and legibility, deliver SuDS benefits by reducing surface water runoff, and contribute to a more attractive and sustainable public realm. An example of this approach is shown in the bottom-left image on BfHL page 70.

The footpath continuing through the parking court to the rear of plots 220–229 should be clearly identified through the use of a contrasting surface material, to reinforce its role as a pedestrian route.

In addition, footpaths within open spaces should be formed in compacted gravel or hoggin, as shown on the External Works drawings, including the path along the eastern boundary. The final material specification should be agreed in consultation with the Landscape Officer. There should be a footpath connection at the end of the private drive between plots 51 and 52 to the open space footpath beyond.

- 16) The Materials Plan should provide a detailed specification for all proposed materials, rather than broad or generic descriptions (e.g. roughcast render, reconstituted stone, red facing brick, red multi brick, dark grey roof tiles, brown russet roof tiles, red roof tiles). Specifications should clearly identify the material type, colour, finish and, where possible, manufacturer.

In particular, any red brick should be an **orangey-red** tone in order to accord with WDG paragraph 3.1.10, which states that *“stone, orangey-red brickwork and render are the common building materials across this part of the county.”*

Recommendation: A schedule of materials should be supported by physical samples, preferably displayed within an on-site sample panel, to enable a full and accurate assessment of the proposed materials prior to determination.

Movement

- 17) The Phase 1 single-decker bus plan shows a north–south bus route with a short eastern extension, where the bus uses a turning head to return. This arrangement appears sub-optimal, given the opportunity for the bus to follow the internal loop road throughout the site covered by this application.

Utilising the internal loop road would allow for a more logical and efficient route and could also support future extension along the wider loop road proposed for subsequent phases of the development. This approach would remove the need for the bus to use the turning head, which has the potential to create conflict with nearby residential areas.

Recommendation: Further consideration should be given to the proposed bus route, including how it could operate within the internal loop road and continue beyond the application site as part of future development phases.

- 18) In the absence of an agreed masterplan for the wider area, the turning head to the secondary street shown in front of plots 18 and 19 dominates the open space opposite.

Recommendation: Preference would be for the turning head to be located between dwellings to avoid intrusion into the open space, or if the secondary street is intended to extend to the east in the future then the turning head should be clearly marked as ‘temporary’.

Informatives

The NPPF recognises the role of design review in ensuring high standards of design and we encourage major development proposals to be independently assessed at an early stage in the process. The NPPF indicates “significant weight” is be given to designs *“which help raise the standard of design more generally in an area”*. The draft NPPF intends to increase this to “substantial weight”. Where a project has a design review, we will consider the panel's recommendations in our planning process and decisions. The Council’s Urban Design Team can provide further information on this process on request.