

## Wiltshire Council Planning Consultation Response

### URBAN DESIGN

**Officer name:**

James Weddell RIBA  
Senior Urban Design Officer  
Wiltshire Council

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**Application No:** PL/2026/02966

**Proposal:** Outline planning application for the erection of up to 275 dwellings (including affordable housing), associated infrastructure, landscape and biodiversity enhancements, with all matters reserved except for the main access from Sandridge Common

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

**Case Officer:** Isobella Wise

Reference:

Drawings and documents indexed 8<sup>th</sup> May 2026 on the application webpage.

Policy and guidance:

- Wiltshire Core Strategy (abbreviated WCS), Core Policy 57 'Ensuring high quality design and place shaping' (abbreviated CP57)
- Wiltshire Local Plan Review - Pre-Submission Draft 2020-2038 (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 updated May 2026) (referenced in the NPPF) (abbreviated BfHL)
- Streets for a Healthy Life: A companion guide to Building for a Healthy Life (Homes England) (abbreviated SFHL)
- Joint Melksham Neighbourhood Plan 2 2020 – 2038 (Made August 2025) (abbreviated JMNP) - The site sits within the Neighbourhood Plan Area (NPA)
- Melksham Design Guidelines and Codes (abbreviated MDGC).

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 Melksham settlement boundary (2020) and is not identified as a draft allocation in the emerging Wiltshire Council Local Plan (January 2023). Although the Planning Statement indicates that the site may be considered as Phase 2 of the Policy 18 site 'Land at Blackmore Farm' given the site is '*immediately adjacent to Phase 1*' and '*it represents a logical and sustainable extension to the settlement*', it currently remains a speculative proposal.

Notwithstanding this, should the principle of development on this site be permitted, I have the following initial comments on the potential scale, layout, and form of development as illustrated on the indicative masterplan. At this early stage no specific house designs have been submitted, and my observations are therefore generally related to the layout only.

The proposals were submitted as part of a pre-application in December 2025. As minimal changes have been made since, the Urban Design consultation response remains applicable and has informed these comments.

## Objection

The submitted proposals do not satisfy the high-quality design and place-shaping requirements of Core Policy 57 for the following reasons:

### Layout

- 1) The indicative masterplan incorporates several positive urban design principles that support a coherent and legible neighbourhood. These include:
  - Perimeter blocks with outward-facing frontages that promote active, overlooked streets;
  - A movement network that is well connected, with a clear through-route linking the A3102 to the Policy 18 site, supported by continuous edge lanes that reduce reliance on cul-de-sacs;
  - A well-integrated open space network is also embedded within the primary street structure.The proposed extension of the Policy 18 bus service further strengthens sustainable travel options.

However, several indicative blocks appear constrained in their layout and proportions. Limited block depths are likely to restrict the delivery of high-quality private amenity space and may lead to increased reliance on visually prominent on-street parking.

**Recommendation:** The proposals should explore alternative parking strategies to ensure parking is discreetly integrated within the urban form. This could include the use of car barns or modest increases in block size to accommodate small, well-overlooked rear parking courts. Street parking could include additional hedgerow planting as well as the planted partitions proposed to enhance the street scene. Any approach should maintain strong placemaking principles and protect residential amenity.

### Access and Movement

- 2) The proposed development connects to Public Footpath MELW40, which provides access to the wider Public Rights of Way network. However, only a single point of connection is currently shown. This represents a limited level of permeability and may constrain opportunities for convenient pedestrian movement.

In line with *BfHL* guidance, which emphasises the importance of **well-connected and walkable neighbourhoods**, developments should provide multiple direct and attractive routes that integrate with surrounding movement networks. Similarly, the *WDG* promotes **permeability and legibility**, encouraging layouts that maximise connections and avoid reliance on a single access point.

There is therefore scope to improve the scheme through:

- Additional pedestrian and/or cycle connections to the **north and south**, where feasible

- Strengthening integration with the wider rights of way network
  - Ensuring routes are direct, safe, and overlooked to promote active travel
- Providing further connections would enhance accessibility, support sustainable travel choices, and better align with both BHL and Wiltshire DG principles.

### *Drainage*

- 3) The proposed SuDS network includes attenuation basins and an indication of “scope for bio-retention verge” along the primary route and side streets.

In accordance with WDG expectations (Sections 6.3 and 6.5), attenuation features should be designed to be multi-functional and to integrate seamlessly into the landscape and avoid the appearance of artificial depressions. A more appropriate approach would distribute water storage across the site through a combination of wetlands, rain gardens, swales, small ponds, and permeable surfaces.

Embedding these features at both plot and street level would significantly improve the visual quality of the development, support biodiversity, and ensure that the drainage strategy contributes positively to local character while aligning with design guidance.

The Design and Access Statement should clearly demonstrate how bio-retention verges are incorporated across all street typologies, including lower-order streets. Street sections should define minimum dimensions, which must be consistently reflected in the Illustrative Masterplan.

At present, there is a discrepancy between the street widths shown in the Illustrative Masterplan and those indicated in Figure 4.28. For example, the primary route shows a frontage separation of approximately 13.5m, whereas the corresponding section suggests a significantly wider corridor. This inconsistency requires clarification.

**Recommendation:** Revise the drainage strategy to ensure compliance with the DEFRA SuDS National Standards (June 2025) and alignment with WDG expectations for green and blue infrastructure. The strategy should incorporate Building for Healthy Life principles by prioritising naturalistic SuDS features, including rain gardens, swales, and wetlands, to enhance visual quality, biodiversity, and site character.

In addition, the street hierarchy drawings should be expanded to include minimum dimensions and demonstrate how sustainable drainage features and street tree planting are integrated across all street types, including lower-order streets, in accordance with best practice.

### *Landscaping*

- 4) While the masterplan locates all allotments within a single central area, opportunities should be explored to distribute some of these spaces throughout the development. Providing smaller, street-integrated allotments at street level would help activate the public realm, support passive surveillance, and encourage everyday community interaction, consistent with the placemaking principles of the WDG and NDG.

**Recommendation:** Opportunities for communal food growing and other communal activities should be considered at street level throughout the proposed development. Redistribute a proportion of the allotments across the development, integrating smaller plots within residential streets and public spaces. This could be explored through an enhanced street hierarchy.

- 5) The proposed siting of the southern play area at the edge of the development, with limited natural surveillance, is contrary to established urban design principles and national guidance. The NDG

and BfHL emphasise that public spaces should be centrally located, well-overlooked and integrated within the layout to promote safety, usability and inclusivity. Secured by Design and Play England guidance similarly advise against placing community facilities in isolated or poorly supervised locations.

Evidence consistently demonstrates that peripheral, poorly overlooked spaces are less well used and can feel unsafe, particularly for women, girls and children. Research including *Make Space for Girls* and GLA safety guidance highlights that visibility, activity and passive surveillance are critical to creating environments that feel welcoming and secure.

The proposed arrangement risks creating an underused and poorly functioning space that fails to meet the needs of future residents. Best practice instead supports the integration of play within the heart of the development, where it is visible, accessible and part of everyday activity.

**Recommendation:** The southern play area is relocated to a central, well-overlooked position within the site, within approximately 100 metres (one minute walk) of family dwellings for a Lap and approximately 400 metres (five minutes walk), to ensure it is safe, inclusive and aligned with national policy and best practice.

#### *Character*

- 6) The site sits on the transition between the existing settlement and the open countryside and if this site is to be considered suitable for development a clear transition between the existing suburbs and the rural edge is required.

However, the Illustrative Masterplan introduces a dense layout within the site's rural setting. In line with NPPF paragraph 129(d) on achieving appropriate densities, development should maintain the prevailing rural character - defined by varied plot sizes and building forms, relatively small-scale and well-spaced 1 to 2-storey buildings, dispersed farmsteads, and the intervening landscape that shapes the area's intrinsic vernacular.

**Recommendation:** Rather than promoting a single dense urban structure, the layout should adopt a looser, more fragmented structure consistent with the rural character particularly along the site's edges and close to Blackmore Farm. This approach would also facilitate better integration with both the site's landscape rationale and the wider landscape. Reference can be made to the NDG (p.20, top-right image), where contemporary forms successfully draw from local rural typologies. Small, well-overlooked parking courts would be acceptable in accordance with BfHL Section 10 h. page 86.

In this context, barn-style residential forms, arranged in farmstead, close, or relaxed courtyard groupings, would be more appropriate - particularly along the site's edges. Such an approach would help prevent settlement coalescence, maintain rural character, and preserve the distinct identity of the surrounding dispersed rural settlements. A study of the forms of Sandridge and other small villages and settlements within the NPA for example may offer local precedent.

- 7) The DAS provides some information on character areas across the site. As supported by WDG 5.2.10, character areas are best defined by the experience of users at the street and space level.

To support this approach, a Design Principles Plan should be prepared to clearly define the characteristics of key streets and spaces. This will help ensure the development is legible, coherent, and attractive to users.

The plan should describe the intended identity of each key street and space, including key characteristics such as building form, height, architectural detailing, density, and boundary treatments. These elements will provide a framework to guide future development.

**Recommendation:** A Design Principles Plan should be submitted for approval. Alongside the Street Hierarchy details noted above, this will form a clear framework for future development and provide a foundation for a Design Code (see comment below).

#### *Parameter Plan*

- 8) Although much of the required information is included within the DAS, two Parameter Plans have been submitted – a Building Heights plan and a Composite Parameter Plan. While the latter describes the land use proposed for the development, it fails to meet the requirements of the WDG Appendix C - Recommended Design Information which offers guidance as to the information that may be expected to support an application dependent on the location, nature, size and complexity of a development scheme. Given the complexity and size of this development, providing as much information as possible at Outline stage is likely to facilitate a smoother consideration at Reserved Matters.

**Recommendation:** The following drawing / plans should also be included with the planning application for outline permission.

- **Movement Parameter Plan** - showing convenient, legible (and continuous where appropriate) networks for all modes relating to block structure and development scale. This should include the illustrative street hierarchy.
- **Density Scale and Massing Parameter Plan** - should avoid generic principles of low-density edge and high-density entrance space/primary route. The density should respond to the urban design strategy that is more nuanced and considers the wider context and opportunities, focusing density on public transport routes, community facilities and public realm spaces that benefit from being more vibrant. This should include the key building locations shown in Figure 4.55 for example.
- **Open Space / GI & BI Parameter Plan** – distinguishing the different types of open space, i.e. SuDS, retained landscape, accessible POS, play areas, allotments, formal recreation areas, inaccessible wildlife zones and new woodland planting.
- **Sketch layout** – Given the lack of confidence that the Illustrative Masterplan can deliver the streets and block sizes envisaged, an indicative site layout should be used to demonstrate site capacity in accordance with design principles. The sketch layout should show a realistic mix, dwelling sizes, parking, gardens and plot numbers. (It is not expected that reserved matters planning layouts replicate outline sketch layouts).

#### **Informatives**

##### *Design Review*

The National Planning Policy Framework (NPPF) recognises the importance of design review in securing high quality development. Accordingly, major development proposals are encouraged to undergo independent design review at an early stage of the design process. The NPPF states that significant weight should be given to designs that “help to raise the standard of design more generally in an area”, with the draft revised NPPF proposing to increase this to substantial weight. Where a scheme has been subject to independent review and endorsement and can demonstrate how the proposal will raise design standards within the locality, this may attract significant weight in the planning balance.

Where a scheme has undergone independent design review, the Council will take the panel's recommendations into account as part of its assessment and decision-making process. The

Council's Urban Design Team can provide further advice on design review options and the value this can add to the development process.

### *Design Codes*

For applications for major residential development, particularly schemes of this size, the use of developer prepared, site specific Design Codes is strongly encouraged. For the larger developments, particularly those likely to be delivered in phases, it may be necessary to require submission and approval of a Design Code by condition where it is in the interests of securing a consistent approach to design. Design Codes should clearly demonstrate how the proposal will raise design standards within the locality and align with relevant national and local design guidance. Where a proposal demonstrates compliance with an approved Design Code, especially where this has been subject to independent review and endorsement, this may attract significant weight in the planning balance.