



# **Design Response to Urban Design Comments**

## PL/2025/09129 Land at Penn Hill, Calne

June 2026

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**Client**  
Castlewood Properties Ventures Ltd

**Our reference**  
CASS3002

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# 1. Design Response

- 1.1 This Urban Design Response is submitted alongside an updated Framework Masterplan and Parameter Plans to reflect updates to the drainage strategy and consultee comments for the Land at Penn Hill Calne (PL/2025/09129).
- 1.2 The table below sets out the responses to each comment in the Urban Design comments received on the 18<sup>th</sup> December 2025.

|   | Urban Design Officer Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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| 1 | <p>I appreciate that the scheme in isolation has been well considered but we cannot view development proposals in isolation. Policy 11 states that ‘A single comprehensive Masterplan, phasing and delivery strategy for the development, must be prepared and approved by the Local Planning Authority in advance of any planning application being submitted for the whole or part of the allocated site. This must take account of the requirements of this Policy and the principles shown within the Concept Plan and be prepared in consultation with the local community and local planning authority. Subsequent planning applications must be in accordance with the approved Masterplan’.</p> <p>The Planning Statement refers to a joint master planning document submitted with the application. However, it appears that this document has not been subject to separate consultation with Wiltshire Council or the local community. As a result, it does not currently meet the requirements of Policy 11. The master planning document, along with a phasing and delivery strategy, should be formally approved before any planning application is determined.</p> | <p>The consultee’s comments rely heavily on “Policy 11” and the requirements associated with the draft site allocation. It is important to note that the Local Plan in which this allocation and associated policy (including the masterplanning requirements) appeared has now been formally withdrawn.</p> <p>The scheme will be integrated with the rest of the now withdrawn proposed allocation as set out in the submitted masterplan document and shown on the updated Framework Masterplan and Parameter Plans. This includes a series of pedestrian links into the neighbouring scheme which respond to technical evidence, including landscape advice to keep development on the western slopes and also working with the topography of the site, which is too steep in the eastern part of the site to deliver a vehicle connection between the two sites that would meet adoptable highways standards.</p> |

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|   | <p>Because Policy 11 is being delivered across two separate sites, a single, comprehensive Design Code is essential for the entire allocation. This will ensure consistent application of Core Policy 57's principles of high-quality design and place shaping. The Design Code should establish clear, shared standards, for example for green and blue infrastructure, building appearance and character, street hierarchy and landscaping, density, and built form. A unified approach will help create a coherent sense of place and avoid fragmented development.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 2 | <p>The application proposes a single access point for all modes via the continuation of the Penn Hill Farm road from the adjacent development (High Penn Park). This design would concentrate traffic on one primary street, increasing vehicle movements near numerous dwellings. Such an arrangement risks reducing residential amenity and creating conflicts between vehicles, pedestrians, and cyclists, particularly in areas with on-street parking and manoeuvring.</p> <p>The proposed single point of unrestricted vehicle access does not comply with key design principles.</p> <ul style="list-style-type: none"> <li>• <b>National Model Design Code (NMDC2, M.1.i, paragraph 19):</b> Requires a connected network that offers a variety and choice of streets for movement within a place.</li> <li>• <b>Wiltshire Design Guide (WDG Expectation 5.19):</b> Encourages opportunities for additional road connections and future highway links, which the current plan fails to provide.</li> <li>• <b>Building for a Healthy Life (BfHL, pages 16–17):</b> Advocates street layouts that allow future extensions ("green" indicators). The proposal instead reflects "red" indicators (page 19), offering no scope for connecting or extending streets to integrate with the remainder of the Policy 11 housing allocation.</li> </ul> | <p>The access proposals (with a single vehicular access via the continuation of the Penn Hill Farm Road from the adjacent High Penn Park) reflects discussions with Highways Officers.</p> <p>A secondary access road was considered at Sand Pit Road, but it was considered that given this would likely be a formalised, priority access junction and the potential for HGVs and other associated traffic to utilise this then it may have an impact upon existing traffic on Sand Pit Road. Instead utilising the established roundabout at Oxford Road/Sycamore Drive would be a more appropriate place for vehicles to route.</p> <p>A secondary access will be implemented for Active Travel and Emergency Vehicles at Sand Pit Road, and it is anticipated that this route will encourage non-carbon journeys, particularly with the proposed Toucan crossing and potential shared use path on Sand Pit Lane.</p> |

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|   | <ul style="list-style-type: none"> <li>• <b>Recommendation:</b> This issue could be resolved by introducing an additional all modes access point from Sand Pit Road (utilising the existing access or a new access at the end of the primary street) and safeguarding a future street connection to the adjacent DWLP Policy 11 housing site. Doing so would meet Policy 11's requirement for direct connectivity to Sand Pit Road and align with Figure 4.5, which calls for more than one unrestricted vehicle access serving the entire allocation.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <p>A vehicle access through to the neighbouring site was considered, however, the topography here does not allow for a street connection with an appropriate gradient due to the changes in levels. Instead, through discussions with the neighbouring site, a series of pedestrian connections have been agreed instead. There are now shown on the updated masterplan, and parameter plans to secure these routes.</p>                                                                                      |
| 3 | <p>The current Framework Masterplan shows a loose grid arrangement, which suggests potential for connectivity. However, the Illustrative Street Hierarchy lacks a loop and instead relies on branching cul-de-sacs with communal driveways that terminate in dead ends. This approach limits permeability and may create operational challenges for residents and service vehicles.</p> <p>According to Wiltshire Design Guide (para 5.2.1), cul-de-sacs should be short, with their turning head visible from the junction with a through road. The proposed layout does not meet this expectation and conflicts with Core Policy 57 (vii and ix) regarding legibility and accessibility. It also reflects 'Building for a Healthy Life' red indicators (pages 18–19) rather than green indicators (pages 16–17), which advocate connected streets along development edges.</p> <p><b>Recommendation:</b> Introduce a looped primary street or secondary connections to reduce reliance on dead-end communal drives, improve legibility, and support future adaptability.</p> | <p>The illustrative street hierarchy in the DAS was provided to demonstrate how the scheme could come forward, with streets and spaces working with the contours of the site.</p> <p>The illustrative Framework Masterplan has been updated to show a looped primary street in the south where topography allows.</p> <p>This is a matter for detailed design and could be secured through an appropriate condition on the outline application for a Design Code that would set out the street hierarchy.</p> |
| 4 | <p>The proposed density of the development is a medium/high density (approx. 41dph) reflecting recent housing developments locally but higher</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <p>We believe that the proposed density is justified as part of a sustainable development that reflects National Policy to make best</p>                                                                                                                                                                                                                                                                                                                                                                      |

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| <p>than the draft allocation, however, the CCNP would expect a lower density in this edge of settlement/rural location ‘Housing densities should be reduced towards development edges and along rural edges in order to create a gradual transition towards the countryside’, (DC.04 4a).</p> <p>The proposed blanket primary, secondary, lanes and private drive typology arrangement reflects a dense, formulaic suburban pattern typical of volume housebuilders, which is out of character with the site’s rural setting.</p> <p>A key thrust of WCS CP57 is that ‘Development is expected to create a strong sense of place through drawing on the local context and being complementary to the locality.’ and paragraph 135 of the NPPF explains that planning policies and decisions should ensure that developments:</p> <p>c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities).</p> <p>However, from NPPF ‘Achieving appropriate densities’ paragraph 129 d) it would be desirable to maintain the area’s prevailing character and setting – i.e. this should draw on the variety of plot and form, small scale, relatively well-spaced apart buildings, farmsteads and intervening landscape character of the intrinsic vernacular of the context.</p> <p>The existing rural character is defined by narrow building depths, farmhouses and farmsteads, and a varied arrangement of structures on irregularly shaped plots. In contrast, the proposed layout - with its regular street patterns, uniform plot shapes, and standardised housing forms -</p> | <p>use of land. It is disingenuous to say that the site has a rural setting as it will be surrounded by development on the west, south and eastern sides. The illustrative character areas within the DAS sets out that the Green Edge Character Area is lower density and can provide the transition to the open space and countryside edges.</p> <p>The regular street pattern within the masterplan has been designed to respond to the features of the site, especially the topography of the site, with development running along the contours to create accessible streets and spaces and settle within the landscape as demonstrated in the LVIA.</p> <p>Higher density development does not equate to bad design, any more than it can guarantee good. It is down to the detail of the architecture, the quality of the landscape and cohesiveness of the layout that will inform and generate the quality of the scheme, all of which will be sought approval through future Reserved Matters.</p> <p>The delivery of a higher density development – within the built envelope that has been established through the parameter plans – will be the result of the types of homes that are proposed to be delivered. This could include an increased proportion of smaller homes, i.e. a higher proportion of 2 and 3 bedroomed houses when compared to 4 or 5 bedroomed houses.</p> <p>Paragraph 129 of the current NPPF (December 2024) establishes the expectation of making efficient use of land, and by seeking approval for up to 210 dwellings within the Penn Hill site, this is representative of making efficient use of land on this site. The approval of up to 210 homes on this site would provide the flexibility to allow for a range of</p> |
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|   | <p>reflects the suburban development model of High Penn Park but does not align with the site's rural context to the north and east.</p> <p><b>Recommendation:</b> Rather than reinforcing a suburban-style urban edge, the layout should aim for a loose-knit, lower-density, fragmented arrangement at the north and east edges that reflects the Penn Hill farmhouse and farmstead typology and aligns with the rural character expectations outlined in the CCNP. This would help integrate the development more sensitively with the proposed eastern landscape corridor and the surrounding landscape. For example, reference NDG page 20 photograph top right '<i>The form of these homes draws from local rural typologies, with a contemporary interpretation</i>'.</p>                                                                                                                | <p>housing types to be delivered and to respond appropriately to the context of the identified housing need at the point of Reserved Matters applications. This would enable this application to make best and most efficient use of land, making optimal use of the site, in accordance with the NPPF December 2024 Chapter 11 and in respect of Achieving Appropriate Densities, paragraphs 129 and 130.</p> <p>This is further emphasised in the consultation on the draft NPPF in December 2025 which sets out in DP3-1a that context should not preclude innovation and change where appropriate, especially where an increased scale or density of development is justified</p>                                                                                                    |
| 5 | <p>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).</p> <p>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.</p> <p>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.</p> | <p>The drainage strategy has been revised following consultation with the LLFA. The changes are:</p> <ul style="list-style-type: none"> <li>• the introduction of swales / thin linear rain gardens along N-S running roads with shallow gradients to provide conveyance and attenuation.</li> <li>• The basins have been redesigned as split-level features, with the lower-level accommodating runoff up to the 1 in 30 year + climate change event. This allows the basins to be opened up to landscaping and amenity uses, including seating and play areas.</li> <li>• The southern wet pond has been relocated further up the slope to enable discharge to the west so it can be actively used as part of the drainage strategy as opposed to a purely habitat feature.</li> </ul> |

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|   | <p><b>Recommendation:</b> 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 to enhance visual quality, biodiversity, and site character.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <p>The basins continue to accommodate the 1 in 100 year + climate change event; however, this level of storage will only be engaged during more extreme rainfall events and can therefore be considered dry under normal conditions.</p>                                                                                                                                                    |
| 6 | <p>Policy 11 requires 0.5ha of land for office-based employment in addition to retaining the existing Penn Hill Farm Industrial Estate. The current application only proposes retention and enhancement of the existing industrial estate, resulting in a shortfall of 0.5ha for office employment provision.</p> <p>Furthermore, the proposed office employment area is co-located with the convenience store and 80-place nursery, which together require approximately 0.45ha. The Planning Statement refers to a Local Centre provided under application PL/2023/10421; however, this allocation delivers only 0.34ha. Based on the submitted information, it is unclear whether the combined provision meets the requirements of Policy 11. Additional clarification and evidence are needed to demonstrate compliance.</p> | <p>As noted previously, the Local Plan in which this allocation and associated policy (including the masterplanning requirements) appeared has now been formally withdrawn.</p>                                                                                                                                                                                                             |
| 7 | <p>The Access and Movement strategy within the DAS indicates a loop of footpaths within the site and links to the existing Public Rights of Way (PROW) network to the north and south. However, it does not provide dedicated footpath connections to the existing High Penn Park settlement and includes only a single link to the other part of the Policy 11 allocation.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <p>Additional footpath links to High Penn Park were considered but are not achievable because of changes in levels and the existing ditch and hedge between the sites and would include outside land ownership that is outside the applicant's control.</p> <p>Additional links have been agreed with the applicants on the neighbouring site and are now shown on the Parameter Plans.</p> |

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|   | <p><b>Recommendation:</b> It is recommended that additional footpath connections be incorporated beyond the site boundary to the east and west. This will improve permeability, strengthen integration with adjacent developments, and support active travel in accordance with WDG expectations and BfHL principles.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 8 | <p>Wiltshire is part of the recently created Western Forest which is a new National Forest for the nation whose aims and objectives are to substantially increase canopy cover across its geographical area. The aims and objectives of National Forests are planning consideration under para 152 of the NPPF (2024).</p> <p>Additional woodland planting is proposed along the eastern landscape corridor within structural planting belts. To achieve full compliance with CCNP Policy NE4 and strengthen integration with the wider landscape, similar planting should be introduced along the northern boundary. This will soften the settlement edge, enhance biodiversity, and create a more natural transition to the surrounding countryside.</p> | <p>The masterplan update includes the provision of an additional woodland copse in the northeastern corner and a belt of trees along the northern boundary. Together this will further increase tree cover on the site and give enhanced connectivity for wildlife. In addition, substantial tree planting is proposed throughout the site which will result in an overall significant increase in tree canopy cover within the site which would contribute to the objectives of increased canopy cover within the National Forest area.</p> |
| 9 | <p>While detailed appearance cannot be fully assessed at this stage, the Design and Access Statement outlines principles that could form the basis of a design code. The following recommendations are advised:</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <p>This is a matter for detailed design and could be secured through an appropriate condition on the outline application for a Design Code that would set out the requested principles.</p>                                                                                                                                                                                                                                                                                                                                                  |
|   | <p>Building Heights: Limit up to 2.5-storey residential development to the 'Gateway' character area to reinforce its prominence and avoid taller buildings on higher ground.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <p>Building heights have been informed by the LVIA and the parameter incorporating up to 2.5 storey buildings are located on the lower parts of the site to avoid taller buildings on higher ground.</p> <p>These parameters provide a maximum and have been tested within the submitted LVIA through the Accurate Visual Representations that demonstrate that the establishment of the landscape strategy would</p>                                                                                                                        |

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|  |                                                                                                                                                                                                                                                      | provide effective mitigation and reduce the overall harm on the landscape character and views from the surrounding area.                                                             |
|  | Green Edge Treatment: Ensure the eastern and northern edges reflect Penn Hill farmhouse and farmstead typologies for a sensitive rural transition.                                                                                                   | This is a matter for detailed design and could be secured through an appropriate condition on the outline application for a Design Code that would set out the requested principles. |
|  | Character Areas: Introduce an additional character area along Sand Pit Road that draws on the high-quality, contemporary design cues of the adjacent Ceres Place development.                                                                        | This is a matter for detailed design and could be secured through an appropriate condition on the outline application for a Design Code that would set out the requested principles. |
|  | Key Buildings and Materials: Provide corner-turning and focal buildings highlighted with contrasting materials - stone within the development core and render within Gateway and Green Edge areas.                                                   | This is a matter for detailed design and could be secured through an appropriate condition on the outline application for a Design Code that would set out the requested principles. |
|  | Material Palette: Avoid buff brick, as it is not typical of central Wiltshire (WDG para 3.1.10). Instead, use locally distinctive materials such as natural stone to maintain contextual integrity.                                                  | This is a matter for detailed design and could be secured through an appropriate condition on the outline application for a Design Code that would set out the requested principles. |
|  | Street Hierarchy: Integrate blue infrastructure elements - such as swales, rain gardens, small ponds, and permeable surfaces - within primary and secondary streets to enhance surface water management, biodiversity, and visual amenity.           | The revised drainage scheme has introduced swales / thin linear rain gardens along N-S running roads with shallow gradients to provide conveyance and attenuation.                   |
|  | Parking Strategy: Provide small courtyard and rear parking clusters positioned to maintain active frontages and reinforce connections to linear landscape corridors and green edge character areas, supporting both legibility and rural transition. | This is a matter for detailed design and could be secured through an appropriate condition on the outline application for a Design Code that would set out the requested principles. |

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