

Wiltshire Council Planning Consultation Response

URBAN DESIGN

Officer name:

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Application No: PL/2026/02943

Proposal: Outline application (with all matters reserved except for access) for the erection of up to 224 residential dwellings (Class C3), 72-bed care home (Class C2), with sports pitch provision, country park, allotments, landscaping and open space.

Site Address: Land off Trowbridge Road, Bradford on Avon

Case Officer: Steven Sims

Reference:

Drawings and documents indexed 7th 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)
- Bradford on Avon Neighbourhood Plan (Made October 2017) (abbreviated BoANP)

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 defined Bradford on Avon settlement boundary (2020) and is located within the Bath and Bristol Green Belt. It is not identified as a draft allocation in the emerging Wiltshire Council

Local Plan (January 2023), nor has it been promoted as a specific housing site through the plan-making process.

While the Planning Statement asserts that the proposals are brought forward on the basis that the site constitutes 'grey belt', the site remains designated Green Belt and forms part of the wider countryside. As such, the proposal should be regarded as speculative in policy terms.

Should the principle of development on the site be accepted, the following initial comments are made in relation to the emerging layout proposals. In the absence of detailed building designs, these comments focus on the overall structure and spatial organisation of the scheme.

The emerging proposals were presented to the Design West (DW) Design Review Panel on 19 May 2026. The recommendations set out in their report dated 8 June 2026 have been taken into account in preparing these comments.

Objection

While the site might be considered to represent a sustainable and well-located opportunity for an exemplar extension to Bradford on Avon, being adjacent to the settlement boundary and close to local facilities, the submitted proposals do not satisfy the high-quality design and place-shaping requirements of Core Policy 57 for the following reasons:

Layout

- 1) With regard to BfHL Section 5 i. page 46, the development proposes extending the settlement edge eastwards to the next field boundary. While this creates an opportunity to establish a new and defined settlement edge, the current proposals do not achieve the 'setting of greater distinction' identified in the DW report.

The first field adjacent to Trowbridge Road presents potential for a strong gateway space (see comment 3) with a clear diagonal alignment and a visual connection to the proposed country park. In contrast, the layout within the adjacent field relies on a more generic grid structure centred on a primary route/spine road, which lacks a clear focal point or sense of destination

There is an opportunity to reconsider the relationship between the development and the country park along this eastern edge. A more integrated and subtle approach could soften the transition, perhaps relocating the northern most parcels to the southeast to create an extension to the diagonal route up to the sports pitches/allotments (notwithstanding off-set requirements for the sports pitches), strengthening the connection between built form and landscape. This would also have the benefit of utilising the long access to the sports facility.

I support the DW report's recommendation that the spine road should incorporate a clear focus. However, a more irregular edge approach - reflecting the existing character of the surrounding villages - may offer a more locally distinctive and appropriate alternative to a formal crescent.

Recommendation: The layout should prioritise a more irregular and responsive edge to the development, reflecting its transition to open countryside. This could be achieved through a strategic reconfiguration of residential and green spaces, creating a more distinctive setting and a softer relationship with the surrounding landscape. I welcome further exploration of how this could be achieved

- 2) 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 proposed access road and private drive arrangement along the eastern edge of the second field introduces a dense, formulaic suburban layout typical of volume housebuilders, which is at odds with 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 reinforcing a suburban-style urban edge, the layout should adopt a looser, more fragmented structure consistent with the rural character. 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 Lower Westwood for example may offer local precedent.

- 3) The DW report identifies several opportunities to reconfigure the gateway space (also referenced in the comments below). This area could accommodate higher-density development, rather than the 'lower density periphery' shown in the Illustrative Masterplan. There is potential to extend development to the existing building frontage south of the proposed entrance, which currently presents a blank gable, thereby creating a more defined third edge to the entrance space.

The entrance space serves as a focal point for internal routes and provides frontage to Trowbridge Road. The multi-use gateway approach recommended in the DW report is supported. This could be delivered through shared facilities as part of an enhanced care home provision, or through standalone mixed-use buildings. These could front the entrance space, incorporating non-residential uses at ground floor level with residential units above.

Recommendation: In accordance with BfHL Section 3 and WDG 8.1.1, the configuration of the entrance space and its surrounding frontages presents an opportunity to deliver a higher-density, mixed-use scheme than is currently indicated in the Illustrative Masterplan.

Access and movement

- 4) I concur with the DW report that the proposed access does not constitute a gateway route. However, the reconfiguration of Trowbridge Road presents an opportunity to create a landscaped, pedestrian- and cycle-priority environment.

Rather than extending the western footpath to form a straight road alignment, the existing narrow footpath along the eastern edge could be widened and enhanced to incorporate planting and sustainable drainage (SuDS) features. This approach would help soften Trowbridge Road and the character of this entrance to Bradford on Avon.

In addition, widening the eastern path would create an opportunity to improve pedestrian and cycle connections to the canal towpath. A controlled crossing, as recommended in the DW report, should also be provided to support safe and convenient movement.

Recommendation: The access should be reconfigured to deliver a high-quality landscaped gateway to both Bradford on Avon and the site, with improved connectivity for pedestrians and cyclists, particularly in relation to the canal towpath and the town centre.

- 5) The DAS identifies a street hierarchy intended to prioritise walking and cycling, with a primary route connecting to secondary streets and, in turn, to private drives. However, this hierarchy is overly simplified and results in a conventional suburban layout, with limited differentiation in the function, scale, and character of streets.

In contrast, Streets for a Healthy Life (SfHL) promotes a broader range of street typologies, including shared surfaces and edge lanes, which support more varied spatial and experiential qualities. The absence of this diversity means the proposed hierarchy does not clearly articulate the intended street-level experience. It also limits opportunities to integrate sustainable drainage systems (SuDS) and street tree planting within lower-order streets.

This issue is compounded by the lack of defined street typologies, such as cross-sections or illustrative material, which would help to distinguish between street types and clarify their respective roles. As a result, the hierarchy is not legible in spatial or design terms.

Furthermore, the edges of the development are predominantly defined by turning heads and private drives. This results in weak spatial enclosure and reduced connectivity, undermining the overall structure of the development (see comment 2).

Recommendation: To establish a clear and legible street hierarchy, the applicant should define a series of street typologies supported by design principles. These should be informed by the SfHL framework and illustrated through cross-sections and diagrams that demonstrate differences in scale, function, and character. *Clear variations in character for streets is more effective than relying on housing “character areas”* (BfHL Section 8 d.).

Lower-order streets should incorporate street trees within the public realm to ensure long-term management and resilience. All streets should also integrate sustainable drainage features, in accordance with best practice (see comment 8).

Drainage

- 6) I support the Drainage Officer’s comments. Indicative drainage features are shown on the Illustrative Masterplan comprising swales and areas of wetland planting and attenuation features. However, these features are limited to only a few streets and the periphery of the development.

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 to enhance visual quality, biodiversity, and site character.

Landscape

- 7) 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).

The DW report recommends tree planting, at present scattered across the open space, should be more carefully considered, to open up and contain the best views and provide a useful mix of unrestricted open recreational space and semi-open woodland for wandering, picnics and nature appreciation. This would be supported, together with an increase in canopy cover within the proposed residential streets and spaces.

Recommendation: To support the objectives of the Western Forest, comply with NPPF paragraph 152, and strengthen integration with the wider landscape, woodland planting in the form of semi-open woodland should be incorporated within the country park and increased canopy cover within the residential development areas. This will soften the settlement edge, enhance biodiversity, and create a more natural transition to the surrounding countryside.

- 8) While the masterplan concentrates all allotments within a single area, opportunities should be taken to distribute smaller allotment spaces throughout the development. Integrating these within residential streets would help to activate the public realm, enhance passive surveillance, and encourage day-to-day community interaction, in line with the placemaking principles of the WDG and NDG.

Recommendation: Redistribute a proportion of the allotments across the development, integrating smaller plots within residential streets and public spaces.

Character

- 9) The DAS does not currently provide information on character areas across the site. As noted in Comment 6 and 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

- 10) Although much of the required information is included within the DAS, a single Parameter Plan has been submitted. While this 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.

- **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.
- **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.

Design Codes

- 11) 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.