

Wiltshire Council Planning Consultation Response

URBAN DESIGN

Officer name:

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Date: 18.12.2025

15.07.2026 Revised drawings and documents indexed 23rd June 2026. Comment in blue below (✗ indicates where reason not addressed or not satisfactorily addressed - ✓ indicates where reason has been addressed or mostly addressed with recommendations).

Application No: PL/2025/09129

Proposal: Outline planning application with all matters reserved (except for access into the site) for the proposed development of up to 210 residential dwellings, and 0.75ha of employment land and ancillary uses, open space, vehicular and pedestrian accesses, landscaping, drainage measures and all other associated works including the demolition existing buildings and structures.

Site Address: Land at Penn Hill, Calne

Case Officer: Jonathan James

Reference:

Drawings and documents indexed 21st November 2025 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)
- Calne Community Neighbourhood Plan (Made March 2025) (abbreviated CCNP)
- CCNP Design Guidelines and Codes (Final Report March 2023) (abbreviated DGC)

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.

Observations

Policy 11 of the WLPR allocates land north of Spitfire Road, Calne for:

- Approximately 570 dwellings
- At least 0.15ha for on-site convenience stores
- At least 0.3ha for an on-site 80-place nursery
- 0.5ha of employment land for office use + 2ha for industrial use

The policy includes a Concept Plan (Figure 4.5) showing the intended layout. The proposed outline application for up to 210 dwellings is located within this emerging allocation.

This site was previously subject to a pre-application (ref. 20/07314/PREAPP) and an outline application (ref. PL/2023/07216), which was later withdrawn. The Urban Design consultation response for the latter application has informed this assessment and should be reviewed alongside this document for context.

Objection

- 1) 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'*.

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.

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.

At Full Council on 19 May, the elected members of Wiltshire Council agreed to withdraw the emerging WLP. It will now be subject to a legal process to finalise its withdrawal - which is likely to happen in July or August (2026). The said Plan has no material weight for the purposes of the application.

Notwithstanding this, the development proposals would still need to meet the requirements of the Wiltshire Core Strategy including CP57 as indicated below.

Despite the requirements of Policy 11, the Framework Masterplan (drawing no. 3001 revision S) for 210 dwellings does not achieve a high standard of design or effective place shaping, as required by CP57, for the following reasons:

- 2) 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.

The proposed single point of unrestricted vehicle access does not comply with key design principles.

- **National Model Design Code (NMDC2, M.1.i, paragraph 19):** Requires a connected network that offers a variety and choice of streets for movement within a place.
- **Wiltshire Design Guide (WDG Expectation 5.19):** Encourages opportunities for additional road connections and future highway links, which the current plan fails to provide.
- **Building for a Healthy Life (BfHL, pages 16–17):** 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.

Recommendation: 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.

✓ The concerns have been satisfactorily addressed. A secondary access from Sand Pit Road will be implemented for active travel users and emergency vehicles. This access is anticipated to support sustainable travel patterns, particularly in conjunction with the proposed Toucan crossing and the potential future provision of a shared-use path along Sand Pit Lane.

Whilst the applicant has demonstrated that a vehicular connection to the neighbouring development is not technically deliverable, the scheme has been amended to incorporate a series of pedestrian links, thereby enhancing permeability and connectivity between the adjoining sites. It is encouraging that agreement has been reached with the neighbouring site, and we recommend that this cooperative approach continues through the development of a Design Code (see comment below) and the Reserved Matters stage.

- 3) 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.

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.

Recommendation: Introduce a looped primary street or secondary connections to reduce reliance on dead-end communal drives, improve legibility, and support future adaptability.

✓ The concerns have been satisfactorily addressed. The Access Parameter Plan has been updated to show a Primary Street loop within the southern part of the site.

- 4) The proposed density of the development is a medium/high density (approx. 41dph) reflecting recent housing developments locally but higher 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).

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.

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:

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).

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.

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 - reflects the suburban development model of High Penn Park but does not align with the site's rural context to the north and east.

Recommendation: 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 '*The form of these homes draws from local rural typologies, with a contemporary interpretation*'.

The applicant's response does not overcome the principal urban design concern, which is not simply the quantum of development but the way in which it is expressed through a largely standardised suburban layout. Whilst efficient use of land is supported by national policy, this must be balanced against the requirements of Core Policy 57, the NPPF and the CCNP, all of which seek development that responds positively to local character and landscape setting. The proposed primary, secondary and lane hierarchy, regular block structure, uniform plots and standardised housing forms appear more reflective of a conventional volume housebuilder model than the site's edge-of-settlement context. Although a lower-density Green Edge Character Area is proposed, the illustrative masterplan continues to exhibit a relatively consistent suburban development grain rather than a clear transition to the countryside.

The concern remains that the northern and eastern boundaries will form the long-term interface with the wider landscape and should therefore draw more strongly upon local rural settlement characteristics, including the Penn Hill farmhouse and farmstead typology, irregular plot arrangements, varied building groupings and a stronger landscape structure. While topography has informed street alignment and detailed design will be considered at Reserved Matters stage, the outline proposals establish the fundamental spatial framework and settlement form. A more landscape-led, loose-knit and less formal approach along the site's rural edges would better accord with the CCNP and help create a more distinctive sense of place that responds to its landscape setting.

✓ If the DAS is not being updated to reflect the latest proposals, an Urban Design Principles Plan could support the application and establish key character principles for future Reserved Matters applications.

However, the Parameter Plans already provide sufficient flexibility for detailed design matters to be resolved at the Reserved Matters stage through a Design Code secured by condition (see comment below).

- 5) 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 to enhance visual quality, biodiversity, and site character.

✓ The concerns have been satisfactorily addressed. The revisions to the drainage strategy to include swales and rain gardens is welcome.

- 6) 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.

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.

Whilst the requirements of Policy 11 are no longer afforded material weight, the proposed development should nevertheless have regard to WDG Expectation 8, which seeks to ensure that sustainable places provide a mix of uses that support day-to-day activities, including opportunities to live, work and play.

- 7) 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.

Recommendation: 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.

✓ The concerns have been satisfactorily addressed. See response to comment 2 above.

- 8) 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).

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.

✓ It is considered that the concerns have been satisfactorily addressed through the provision of additional woodland planting along the northern and north-eastern boundaries, complemented by further tree planting across the site.

9) 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:

- **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.
- **Green Edge Treatment:** Ensure the eastern and northern edges reflect Penn Hill farmhouse and farmstead typologies for a sensitive rural transition.
- **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.
- **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.
- **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.
- **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.
- **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.

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.

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.