

Wiltshire Council Planning Consultation Response

URBAN DESIGN

Officer name:

James Weddell RIBA
Senior Urban Design Officer
Wiltshire Council

Date: 17.08.2026

Application No: PL/2026/04302

Proposal: Full planning permission for the proposed erection of a three storey building to form a 66 no. bedroom care home for older people with parking, access, landscaping and associated ground works.

Site Address: Pavilions Court, White Horse Business Park, Trowbridge, BA14 0FY

Case Officer: Steven Sims

Reference:

Drawings and documents indexed between the 9th and 22nd July 2026 on application webpage.

Policy and guidance:

- Wiltshire Core Strategy, Core Policy 57 'Ensuring high quality design and place shaping' (abbreviated CP57)
- 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)
- Parking What Works Where: 2nd Edition (Homes England March 2026) (abbreviated PWWW)
- The North Bradley Neighbourhood Plan, Our community 2018-2026, Made May 2021 (abbreviated NBNP)

Draft Wiltshire Local Plan ('WLP')

At Full Council on 19 May 2026, the elected members of Wiltshire Council agreed to withdraw the previous 'emerging' Wiltshire Local Plan. The said Plan has no material weight for the purposes of the application.

In accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2026, on 30th June 2026 Wiltshire Council published a notice of intention to prepare a new local plan for Wiltshire.

The next stage is a Scoping Consultation which commences on 2 September 2026. This plan is at a very early stage and currently carries no weight for decision making.

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

The application site is a brownfield parcel of land located predominantly within the Trowbridge Limits of Development (2020). It forms part of West Pavilions Court within the White Horse Business Park Principal Employment Area, as designated by Core Policy 35. The site was formerly used as an overspill car park and is characterised by extensive hardstanding. To the east, Pavilions Court comprises a series of two-storey residential apartment buildings created through the conversion of former office premises. To the west lies the site allocated for residential development under Policy H2.2 (Land off the A363 at White Horse Business Park) in the Wiltshire Housing Site Allocations Plan (February 2020).

From an urban design perspective, the proposed care home use is considered acceptable given its relationship with adjacent residential development and its proximity to public transport services, providing sustainable access for both residents and staff.

Subject to the principle of development being accepted, the following comments are provided in relation to the scale, layout, form and appearance of the proposed development, as illustrated within the submitted plans and supporting information.

The site was previously the subject of a pre-application enquiry (reference ENQ/2023/01172). The Council's response, set out in a report dated 14 November 2023, is referenced throughout this response.

Objection

The development proposals would not meet the high quality design and place shaping requirements of CP57 nor would they meet the high quality locally relevant design requirements of the SNDP for the following reasons:

The scale and massing of the development

- 1) In his pre-application response, the case officer advised that the proposed three-storey building would be excessive in scale, height and bulk in this prominent edge-of-business-park location adjoining the open countryside. The officer further advised that the overall building height should be lower than the adjacent Pavilion Court buildings and that development should be restricted to two storeys.

The submitted scheme has not responded positively to this advice. Whilst the roof form has now been clarified as flat-roofed, the overall scale, massing and visual presence of the building remain substantially unchanged from the pre-application submission. Consequently, the proposal would continue to appear unduly dominant within the streetscape and as part of the transition between the employment area and the adjoining rural landscape.

The WDG, BfHL and NDG all emphasise the importance of development responding positively to its context, reinforcing local character and ensuring that building form, height and massing are appropriate to their surroundings. In this regard, insufficient regard has been given to the site's sensitive gateway position and its relationship with both the open countryside and the approved residential development to the west.

The existing Pavilion Court buildings achieve a softer transition within the landscape through the use of two commercial storeys beneath pitched roofs. Similarly, the adjoining H2.2 residential development will comprise predominantly two and two-and-a-half-storey forms. Against this context, the proposed flat-roofed three-storey building would appear visually prominent and out of scale with neighbouring development.

Recommendation: A more contextually responsive solution would be a reduced-height building of two and a half storeys incorporating accommodation within the roof space. The use of pitched

roofs, dormers and variations in the eaves and ridge lines would assist in breaking down the perceived mass of the building, creating a more sympathetic roofscape and reducing its impact on views from the surrounding area. Such an approach would better reflect established character and achieve a more appropriate transition between the business park and adjoining countryside, whilst accommodating the operational requirements of the development.

The appearance of the development

- 2) In addition to the concerns regarding scale and massing outlined in Comment 1 above, the proposed elevations appear overly repetitive and lack sufficient architectural articulation. The repeated window proportions, regularised arrangement of openings and uniform treatment across each floor result in a building form that appears monolithic.

This approach does not fully reflect the design objectives of the WDG, which promotes development that responds positively to local character and incorporates variety, legibility and visual interest within building elevations. Similarly, the NDG encourages development that creates a distinct identity through high-quality architecture and varied building forms rather than repetitive façades.

Recommendation: Although the proposal seeks to reduce the apparent scale and visual bulk of the development through the subdivision of the elevation into distinct bays and material variations, the overall composition remains relatively uniform. The design would benefit from greater modulation and a more pronounced architectural hierarchy, including:

- **Stepping back elements of the upper storey** to reduce the perceived scale and visual mass of the building.
- **Introducing architectural variety and detailing**, such as gables, chimneys, dormers, projecting bays, balconies, recessed elements, entrance features, varied window proportions or double-height elements, informed by positive local precedents.
- **Providing a stronger architectural rhythm and hierarchy** through changes in façade depth, roof articulation, or fenestration patterns.
- **Enhancing key corners and entrances** to reinforce wayfinding and create a more distinctive identity.

These amendments would assist in creating a building that better responds to its context, exhibits a stronger sense of place and achieves the high-quality design expectations set out within the WDG, BfHL, NDG and NPPF.



Two and three-storey precedent care home images demonstrating architectural variety

The layout of the development

- 3) The proposed outward-facing development located within the north-western part of the site, with parking accommodated to the rear and south, is considered acceptable and represents an improvement on the pre-application layout. The revised arrangement establishes a clearer distinction between public and private realms, with active frontages addressing the surrounding context and a more coherent parking courtyard arrangement.

Notwithstanding this improvement, there are concerns regarding the relationship between the proposed built form and the eastern area of secured courtyard gardens. The current arrangement appears likely to result in significant overshadowing of this space for much of the day, while the adjacent parking court would benefit from the greatest levels of solar access. Whilst some shading may be beneficial during periods of extreme heat, the proposed disposition does not appear to optimise the quality, attractiveness or usability of the secured courtyard gardens. The most valuable and flexible part of the site is effectively being given over to vehicle storage, whilst the secured courtyard gardens occupies the least favourable microclimatic position.

Recommendation: In accordance with the principles of the WDG, BfHL and the NPPF, the external spaces should be designed as attractive, functional and healthy environments that support resident wellbeing and provide a high standard of amenity. A daylight and sunlight assessment should therefore be undertaken to demonstrate whether a modest repositioning of the building footprint further east and/or south could improve solar access to the open space without prejudicing the overall quality of the development. This would help ensure that the layout optimises the relationship between built form, landscape and parking areas, and maximises the usability of the proposed green infrastructure.

Landscape and Drainage

- 4) The proposed drainage strategy should not rely predominantly upon two small swale features, underground pipes and a large underground tank. Instead, a distributed SuDS approach, consistent with Section 11 of BfHL, is expected. This should incorporate a range of integrated measures, including swales, rain gardens, permeable paving, wetlands and smaller attenuation features embedded within external areas throughout the site.

Such an approach would provide more effective surface water management whilst also delivering water quality improvements, biodiversity enhancement and a stronger landscape-led character. The applicant should demonstrate how the proposals accord with the DEFRA SuDS National Standards (June 2025), the WDG and BfHL principles through the provision of multifunctional drainage infrastructure that is integrated into the site's landscape framework and public realm.

Recommendation: Opportunities to incorporate SuDS features within the external spaces should be explored. In particular, consideration should be given to a wetland or rain garden feature within the secured courtyard gardens. This could provide additional attenuation capacity whilst creating a landscape feature for the enjoyment of the residents and employees.

It is noted that permeable block paving is proposed within the parking bays. These should be of a colour to contrast with the tarmac area to enhance the public realm. Similarly, contrasting materials, preferably permeable, should be used for the surfaces of the footpaths to and from the parking area, around the building and the connection to Bradley Road.

- 5) Whilst tree planting has been incorporated around the perimeter of the car park, further opportunities should be explored to introduce trees and planting within the parking layout itself. BfHL Section 10 recommends approximately one planted space for every four parking bays, although from an urban design perspective, a higher level of provision, such as one tree for every three bays, would be preferable where site constraints allow.

The introduction of additional trees and understorey planting would help reduce the visual impact of parked vehicles, improve the quality of the public realm, provide shade and shelter, contribute to biodiversity, and support climate resilience objectives.

Alternatively, consideration could be given to the installation of photovoltaic (PV) canopies over parking bays – potentially relocating some of the roof top arrays to this location. Such an approach would provide shelter for vehicles and users whilst also contributing towards the site's renewable energy generation strategy.

Recommendation: In accordance with BfHL, the NDG and WDG principles, further opportunities should be explored to increase shade, shelter and landscape integration within the car parking areas. This could be achieved through additional tree planting and soft landscaping within parking aisles and/or the introduction of PV canopies over selected parking bays.

Materials

- 6) The extensive use of red brick across the principal elevations further emphasises the monolithic form of the building and contributes to an overly institutional appearance. When considered alongside the overall scale and massing of the proposal, the limited variation in materials fails to provide sufficient visual relief or façade articulation.

In this part of Wiltshire, natural stone is a prominent component of the local vernacular. Restricting its use to decorative banding and isolated detailing does little to break down the perceived scale of the building or reinforce local distinctiveness. A more balanced approach to material composition, combined with a clearer subdivision of elevations into identifiable bays and building elements, would help reduce apparent bulk and create a more domestic and welcoming character appropriate to a care home setting.

Such an approach would better accord with the principles of the WDG, BfHL, the NDG and NPPF guidance relating to local character, identity, visual attractiveness and well-designed places.

Recommendation: Greater consideration should be given to the use of materials, façade articulation and architectural detailing as mechanisms for reducing the perceived scale and mass of the development. Increased use of locally characteristic materials, together with a stronger subdivision of elevations into visually distinct components, would help create a more attractive, contextual and welcoming building form better suited to its care home function.

Ancillary Buildings and Utility Infrastructure

- 7) The proposed bin store, cycle shelter and PV battery housing display a contemporary architectural approach incorporating timber detailing and steel framing. In contrast, the proposed electricity meter housing is a utilitarian brick structure that appears unrelated to the architectural language established elsewhere within the development. Furthermore, no plans or elevations have been provided for the substation, preventing a full assessment of its design and visual impact.

As these structures are grouped together within the site, they should be considered as a coordinated family of buildings rather than as individual components. The current approach results in a fragmented appearance and misses an opportunity to create a coherent and attractive service area.

The WDG and NDG emphasise the importance of creating a strong sense of place through a consistent approach to materials, detailing and building design, including the treatment of servicing and utility infrastructure. Similarly, BfHL highlights the importance of ensuring that elements such as bin storage, servicing and utility features are carefully integrated into the wider design of a development. The NPPF seeks to secure well-designed places that are visually attractive and

establish a strong sense of place through the use of appropriate architecture, materials and detailing.

Recommendation: Detailed plans and elevations for the proposed substation should be submitted. The substation, meter housing, cycle store, bin store and PV battery enclosure should be designed as a coherent group of structures with a consistent palette of materials, architectural detailing and enclosure treatments. Consideration should also be given to elevating the design quality of the meter housing so that it positively contributes to the character and appearance of this part of the development rather than appearing as a purely functional addition