

Origin3 Ref: 25004 East of Blackmore Farm, Melksham –
14th August 2026

Wiltshire Council
County Hall
Bythesea Road
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BA14 8JN

Attn of Isobella Wise

Application reference: PL/2026/02966

Application address: East of Blackmore Farm, Sandridge Common, Melksham, SN12 7QS

We write on behalf of the applicant in response to the Urban Design Officer consultation letter dated 24th June 2026. The letter stated an Objection in reference to not satisfying the high-quality design and place-shaping requirements of Core Policy 57 for a number of reasons, which are responded to below.

In the letter, putting aside the principle of development, the officer however notes that the 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.*

(and) The proposed extension of the Policy 18 bus service further strengthens sustainable travel options."

Overall, we feel the comments identify that the scheme, at a Masterplan level, demonstrates a generally agreeable disposition of development uses proposed for the site. This is also supported by the Landscape Officer comments, who notes:

"I am generally happy with the layout of the scheme and how it impacts the landscape with a reasonable 'green buffer' being left between development and the rural landscape / Special Landscape Area."

The Urban Design Officer comments reflect consideration of areas of detail, rather than the general disposition of development uses, overall connectivity and the GI network proposed by the Application Site. In our opinion, many of the points raised would be better addressed at Reserved Matters stage when greater certainty can be given and controlled regards design matters. This is of relevance given the recent submission of detailed design proposals for the adjoining Allocation which, when agreed and approved, will create an immediate design context for the Application Site in the future to respond to.

For ease of reference, the relevant Consultee comments are reproduced below (*italic text*), with our corresponding design response provided beneath each point.

1) Layout

“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.”

- At this stage, the Masterplan is Illustrative and the application does not specify the parking treatments for each parcel, but it does indicate that parking will be tailored across the site to ensure it meets parking standards and design recommendations.
- As such, the sizing of parcels and their parking would be better evaluated at RM stage when all matters on layout are presented for approval, including placement of certain housing typologies which may best deliver parking to meet standards in key areas. The design specifics on acceptable parking which are ultimately agreed for the allocated site next door will also, at that time, provide a baseline for the RMs for this Application to reflect, given their close proximity.

2) Access and Movement

“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.”

- A single point of connection was initially proposed to limit the hedgerow breaks in a proposed dark corridor. However, as additional connections have been requested,

the Team is looking to create a second point of connection onto Bridleway MELW40 for increased permeability.

3) Drainage

“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.”

- The drainage strategy proposes that attenuation basins would be designed to be multi-functional and embedded in the landscape. The detail of upstream drainage components within the catchment is not fixed at this stage, but as the Officer notes, the masterplan includes green margins to primary roads and indicates their scope to serve as bio-retention routes for surface water. These are not fixed however to provide flexibility for Reserved Matter details to address all technical site design requirements, which will include drainage hierarchy, highway gradients and plot design specifics.
- This overall strategy is subject to discussions with the LLFA consultee.

“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.”

- The sections in Figure 4.28 show the component parts of the street – which could include front of plot parking in some areas (depending on bus service limitations). As such, the width of the overall street may vary. The masterplan, at this stage, does not seek to fix areas where street parking is provided to retain flexibility to respond to bus routing design requirements and other technical details such as drainage conveyance and local terrain re-forming. The Masterplan shows a general principle of a main street through the site, but does not define fixed front of plot parking locations at this stage.
- It is unlikely that one consistent section / specified distances will exist along the main route as the route is travelling across different gradients and drainage catchments,

it would therefore be preferable to leave fixing distances to Reserved Matter stage, to allow greater certainty which the site's developer will establish in consultation with Officers.

4) Landscaping

"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. "

- As it stands, the allotment quantum is small in scale and it has been collated into one location to allow its provision to be clearly defined and measured for approval. Their clustering into one site also consolidates it for sale / transfer, provides an economy of scale for delivering their servicing requirements and agreeing their management in the future.
- The value of pocket allotments is appreciated, but we do not feel this site is large enough to warrant this strategy being specified at this Outline stage. If the site gains approval then 'grow-patches' could be integrated at a local street level as part of a developer's overall community establishment activities.

5) Landscaping

"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. "

- This southern play space is proposed to be overlooked by housing to its northern edges with homes separated from the play area by recommended offset distances. The exact position of the play area in the space is indicative at this stage and would be designed to maximise visual surveillance through RM design.

- This southern park was sited specifically to act as an activity threshold between the housing area and the wider Valley Park – offering a play destination for smaller children living in the south of the site which is within the confines and management of the housing site. It would serve a catchment for those children living on the southern edges of the site who might otherwise end up playing more frequently in the wider open space beyond, which we recognise is far less overlooked.
- This Southern Park also allows families on circular walks through the wider valley park area to enjoy a play park on the way – either here or in the consented site next door, without needing to site something more visually intensive in the Valley Park areas themselves or detour further up into the site if they live in the southern areas.
- We do not feel that moving the play area further up into the site would support these strategies.

6) Character

“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.”

7) Character

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 average density proposed for the Application Site is 36dph (across the gross development parcels). This is lower than the consented site next door which was approved at 38.9dph). This is also lower density than that suggested by the draft

allocation of the consented site – which stated an average density of 37dph was suitable for a site with a ‘rural edge’ setting in this location.

- The application also proposes that, at detail stage, the density of the upper eastern edges would be lower than the rest of the site. It does not however stipulate the upper and lower ranges as, without a fixed mix, the proportion of the density areas will not be known or fixable until Reserved Matter stages.

- We also believe that the rural character in the east of the site is denuded by the pylons, Lopes Close, the Solar Farm and Bess Generator, the modern barns at both Manor Farm and Blackmore Farm and the modern strip of housing along Sandridge Common. It will, in the future, also have growth consented to its west.

- This is referenced by the Landscape Officer in their response who indicates that *“Generally I am in agreement with the LVA and Cumulative impact study that whilst there will be both individual and cumulative harm to the Melksham Open Clay Vale by the development of this site this should be seen in the context of the settlement edge that has already been heavily influenced by new suburban development over the past decade. The District and County LCAs call for green buffers including woodland to be developed along the exposed urban edges of Melksham and the sketch masterplan shows a mixture of green buffers and tree planting to provide this required screened edge.”*

- As seen in the DAS, the Edge character has been indicated as lower in height and density, with more rural characteristics to the buildings overall but, for landscape reasons (and the overhead pylon), there is a preference to have GI on the eastern edge which naturally consolidates the housing into larger areas to make best use of the land proposed for development, rather than disperse GI in and amongst singular pockets of housing.

- The proposal has however sought to structure the housing areas into a number of GI defined parcels, including adding a GI corridor in the east of the site, to fragment the overall massing and the DAS states that the eastern upper edges would be of lower densities than the western lower edges.

- The Landscape Officer, in their response notes that *“I am generally happy with the layout of the scheme and how it impacts the landscape with a reasonable ‘green buffer’ being left between development and the rural landscape / Special Landscape Area.”*

- As this scheme is proposed to be sat alongside and connected to the visible and sizeable consented scheme to the west, it would therefore be preferable to wait to Reserved Matter stage to further define characterisations for the housing facing GI on the eastern edges of the site in particular. At that stage, the RMs for development of land to the west would be consented and this will allow the characterisation principles of this site to be designed with that also in its context.
- The consented site next door was approved on the basis of the information contained with its submitted Design and Access Statement (prepared by Origin3 for Gleeson Land) and is now progressing to Reserved Matters without a Design Principles Plan. As such it is proposed that the information contained with this Application's Design and Access Statement is comparable and sufficient enough to establish the intent for the development proposal at this Outline stage, without a Principles Plan. Subsequent Reserved Matter applications will have the benefit of detailed approvals on the allocated site next door to expedite and inform the detailed design matters in the future which will avoid discussing and defining some design choices twice over.

8) Parameter Plan

"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."

- Subject to discussion with the Case Officer, it is not proposed to supply additional Parameter plans at this time as the submitted plans have been considered by and were suitable for the undertaking of an Environmental Impact Assessment by the Applicant's consultant team.
- The plans adopt a combined approach to displaying information to ensure that, as much as possible, all key development parameters for the Outline Application are

read holistically. This aims to prevent one plan being amended without due consideration of all interests.

- Furthermore they reflect the same content approach taken for the consented site next door, which was successfully approved for Outline with an Environmental Impact Assessment.
- The level of information recommended as required for fixing by the Appendix to the WDC would be most applicable when a detailed scheme has been prepared by a developer. Detail of much of the internal composition of the development is not submitted for approval at Outline, with all matters apart from Access being reserved. Therefore it is not proposed to show items such as internal roads on the Parameter Plan as they have not been a key matter to assess for Environmental Impact and are not being applied for in detail.

I hope the commentary above may be read in a constructive manner, with a view to agreeing a comparable approach to the level of information supplied for an Outline Planning process to that which was suitable for the approved site next door.

Yours sincerely,

Clare Danks
Urban Design Director

