

Wiltshire Council Planning Consultation Response

URBAN DESIGN

Officer name:

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Date: 12.05.2026

21.08.2026 Revised drawings and documents indexed 20th August 2025. Comment in green below (✗ indicates where reason not addressed or not satisfactorily addressed - ✓ indicates where reason has been addressed or mostly addressed with recommendations).

Application No: PL/2026/02134

Proposal: Outline planning permission for up to 315 dwellings with associated access and infrastructure including Suitable Alternative Natural Greenspace. All matters are reserved except for access.

Site Address: Land North and South of Stones Lane, and North of Malmesbury Road, Cricklade, SN6 6JP

Case Officer: Oliver Phippen

Reference:

(Application files indexed 07.05.2026) on the Arcus application webpage

Design and Access Statement – V2
Framework Plan Rev 05
Landscape Masterplan Rev P03
Parameter Plan - Green Infrastructure Rev 05
Parameter Plan - Land Use Rev 03
Parameter Plan - Storey Heights Rev 03
Landscape & Visual Impact Assessment Rev B

Policy and guidance:

(list of key documents relevant to the response) For example:

- 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 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)

Note: Proposed update to NPPF expected March 2026 and incorporation of NDG, NMDC Parts 1 & 2, and BfHL/SfHL in a 'Design and Place making Planning Practice Guidance' document (DPPPG) expected shortly also.

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 NPPF recognises the role of design review in ensuring high standards of design and we encourage major development proposals to be independently assessed at an early stage in the process. The NPPF indicates "significant weight" is to be given to designs "which help raise the standard of design more generally in an area". The draft NPPF intends to increase this to "substantial weight". Where a project has a design review, we will consider the panel's recommendations in our planning process and decisions. The Council's Urban Design Team can provide further information on this process on request.

Observations

The site lies outside the current settlement boundary for Cricklade (2018) and is not identified for development in either the emerging Wiltshire Council Local Plan (January 2023) or the Cricklade Neighbourhood Plan. As such, the proposal is considered speculative at this stage.

The Cricklade Neighbourhood Plan confirms that, with existing permissions, Cricklade has 'more than provided for the required housing'. Proposals must therefore demonstrate a particularly high standard of design, integration and landscape response, especially where located outside the defined settlement boundary.

Notwithstanding this, should the principle of development on this site be considered, I have the following comments on the development proposals. At this early stage no specific house designs have been submitted, and my observations are therefore generally related to the layout in outline.

Objection

- 1) Both Building for a Healthy Life and the Wiltshire Design Guide (Sections 6.3 and 6.5) expect sustainable drainage to be integrated into streets and open spaces as multifunctional green and blue infrastructure using a combination of wetlands, rain gardens, small ponds, and permeable surfaces, rather than appearing as isolated or engineered features. In sensitive edge of settlement locations and in sites of this scale, SUDS features should also contribute positively to spatial character and visual quality, not solely perform an engineering function. The precedent image on p47 of the DAS shows an engineered approach to SUDs and this is the type of feature to be avoided. Pumping stations are noted in the DAS, and these should be sufficiently screened in high quality materials to ensure they do not detract from the attractiveness of the scheme. Greater information is required on how this will be achieved.

Recommendation: Integrate SUDs into the streets using a combination of wetlands, rain gardens, small ponds, and permeable surfaces which could help create greater differentiation between street

characters also. One possible solution could be for the main avenue street to integrate swales within them or for the green edge to incorporate green and blue infrastructure which could then form an edge to street and a clear threshold into the landscape beyond which is both attractive and a functional drainage system.

See below one example from Eddington Cambridge which creates an attractive street with integrated SUDs and small bridges across.



✓ The inclusion of swales, rain gardens and permeable paving is welcomed.

✗ The original comment was also concerned with a potentially overly engineered approach to drainage including attenuation basins which can detract from the quality of placemaking. Building for Healthy life illustrates the risks with this approach as can be seen below. The outline submission should establish clear design principles requiring attenuation basins to function as high-quality multifunctional green and blue infrastructure, providing landscape, biodiversity and amenity benefits alongside their drainage function. This should include avoiding steep sided basins and fenced barriers.



✗ The explanation regarding the practical limitations of swales on east-west streets is noted. However, it is unclear whether similar constraints apply to rain gardens, and further clarification should be provided on whether these or alternative solutions could offer a means of integrating SuDS features within these streets.

✓ The DAS notes potential screening which could be added to the pumping station area which should be noted as essential. Although pumping stations have equipment below ground they are inherently engineered, publicly inaccessible spaces that are typically characterised by hard surfacing, utility infrastructure and security requirements. It is advised that the conditions are attached to the screening of the pumping station to ensure this is sufficiently screened at later planning stages.

- 2) On the whole, landscaping appears to be focussed on the periphery, but it would be welcomed if this could be brought into the scheme in a meaningful way. Bringing landscape in can aid with SUDs but it can also be beneficial with regards to placemaking and townscape legibility. Having landmark areas of landscape can help aid navigation and create attractive memorable places. This approach is inconsistent with 'what green looks like' set out in BfHL (p.47). These spaces can slow traffic, but also create a moment of pause for the residents that live there in an overlooked, safe and secure area.

In addition the play area is located at the main entrance of the site and on the main access road. This is not conducive to creating a desirable and overlooked play environment.

Recommendation: Amend the site layout and bring the play area and landscape areas deeper into the scheme so there are areas which are sheltered from the Malmesbury Road but also overlooked by homes. These landscaped spaces can help create memorable areas and landmarks to aid navigation around the site also, which would align with p44. Of BfHL 'a memorable Character' and Cp57 vi, ix.

Play areas could be brought into some of the streets, which could also improve their characters and help define differences that aid legibility whilst also creating memorable attractive and safe places for people to play. Please see example below from Accordia in Cambridge.

✓ It is acknowledged that street trees have been added to the landscape plan and the DAS refers to potential for incidental play in areas.

✗ Whilst the applicant states that topography has influenced the location of play provision, it is unclear exactly why this necessitates its concentration at the site edges.

As highlighted below, the green corridors present a possible opportunity to incorporate play as part of a multifunctional landscape strategy, helping to animate these spaces and integrate recreation within the heart of the development, which would be well overlooked, rather than relying predominantly on provision at the site's periphery.



- 3) The lack of detail regarding material palette and architectural expression across the scheme is a significant omission. At present, there is insufficient information to demonstrate how the development will achieve a coherent or distinctive identity. A key part of CP57 is 'Ensuring High quality design and place shaping' notably point xii. Currently the scheme cannot communicate this quality is to be designed to.

Whilst this is an outline application, greater clarity is required to ensure that design quality is retained at later stages. In particular, the absence of a clear architectural strategy introduces a risk that the scheme could be watered down at reserved matters stage, resulting in a generic development lacking local distinctiveness.

The DAS sets out three character areas: Urban Street, Village Street and Green Edge. While the principle of defining character areas is supported, these are currently insufficiently differentiated. The precedent imagery presented does not adequately demonstrate how these areas will differ in

practice, with many examples appearing interchangeable. Additionally the precedent images on the character area pages resemble generic housing developments and align with 'what red looks like' on p.61, p67, p79 of BfHL.

Recommendation: A clearer framework should be provided, this could be through parameter plans or a design code, to address and communicate:

- materiality
- boundary treatments
- a distinctive architectural strategy and language that is specific to Cricklade and enhances the local distinctiveness (see CP57).

Cricklade high street demonstrates principles of perimeter blocks however the character area diagrams present a fragmented block structure and boundary enclosures not communicated. This risks aligning with 'what red looks like' on p55 of BfHL 'well defined streets and spaces'.

✓ The Materials and Appearance page as well as the Perimeter block page are welcomed and help to define the material strategy and boundary treatments.

- 4) The village street character precedents images appears to essentially be the same as the primary street or urban street, which is concerning. Furthermore reducing the highway width, having less landscaping and slightly stepping the building frontages out is not sufficient alone to create a genuinely different character. More information is required to demonstrate the streets contributing to the character and place in accordance with WDG section 5 Movement or BfHL 'what green looks like' pages 52/53 and pp. 64/65, 'Well defined streets and spaces' and 'Healthy Streets'.

Within the Village Street character area, some tree planting is illustrated within private plots rather than the public realm. This weakens street character and runs counter to best practice guidance, which emphasises the importance of trees within streets to create enclosure and identity. Please also see NPPF section 136.

Recommendation: Trees should be placed within the public realm to align with BfHL. Attention should be given to surface materials which could help delineate the street being a slower and different character as can be seen in the example below of a mews typology. As noted above, the character areas need greater architectural character differentiation, rather than interchangeable precedent imagery.

✓ It is acknowledged that streets trees have been added to the landscape plan which is welcomed and the character areas now have more varied and distinctive precedent images. Additionally the Mews streets have been noted as having permeable paving which is welcomed both for developing character and for a drainage strategy which would align with the BfHL approach of 'soak before draining'.



- 5) The Green Edge character area raises particular concerns. BHL (p.17) discourages extensive use of private drives, which can frustrate pedestrian and cycle movement, particularly along site edges. Furthermore, the current layout does not adequately respond to pedestrian desire lines. Whilst the intention to create an outward-facing edge is positive, this should be achieved through a coherent connected street, rather than fragmented private access arrangements.

Recommendation: To avoid frustrating pedestrian users, private driveways should become 'edge lanes' connecting with each other. The key difference being these are not private and solely reserved for the homeowner at the end of the driveway. An edge lane provides access for other users such as cyclist and pedestrians. These lanes can prevent vehicle through traffic but should present a legible connected route for pedestrians and cyclists not a private vehicular dead end driveway. Please see also SfHL Edge Lanes/Private Driveways (page 53 onwards). Consideration should be given to shared surface streets, Mews typologies and as noted before, the transition from edge lane to landscape could incorporate blue green SUDs such as swales and could create a positive attractive edge condition.

✗ The desire to create edges overlooking green spaces is welcomed however there are concerns that this would still be a frustrating area to navigate. The diagram on p.54 of the DAS is

encouraging as it presents a pedestrian option running closely to the edge lane however the landscape plan appears to show a disconnected path which would be frustrating to use in particular situations. For example, to get from point 1 to point 2 in the screenshot below it may be that users need to take a convoluted route around via the separated pedestrian path.



The new NPPF places importance on prioritising the ability to walk wheel and cycle, and providing a 'permeable street network'. The use of private drives without connections presents an impermeable street network in this regard.

As previously suggested it is recommended that the private drives connect. If allowing vehicle traffic to connect is not desirable, then design features to prevent vehicles should be utilised, but the lanes should still connect to enable people walking wheeling or cycling to pass through and create a permeable street network in line with the NPPF. Please see markup below of where private drives should connect and areas which could be for pedestrians only. Please also see a screenshot from Streets for a Healthy life which demonstrates the principle of connected private drives or 'edge lanes' which restrict vehicle traffic.



Private drives should connect – please see indicative orange areas where connection is not provided currently.



Edge lane example – Note the bollards to prevent vehicle passing by but allows people walking, wheeling and cycling to pass through without having to go around to another route.

- 6) The site currently has a Public Right of Way running across the site. The proposed scheme places an attenuation basin at the point re routing the PROW. Re routing the PROW reduces the legibility of the route and this goes against CP57 ii. The attenuation layout should be amended to suit the current PROW desire lane, this could be done by splitting the attenuation area or with a bridge over.

✓ The basin has been split which addresses the above comment.

- 7) The provision of woodland planting along the western boundaries is welcomed in line with Wiltshire forming part of the newly established Western Forest, a National Forest initiative that aims to significantly increase canopy cover across the region. The objectives of National Forests are a material planning consideration under NPPF (2024) paragraph 152.

Recommendation: To achieve full compliance with the NPPF, it is recommended that further woodland be introduced to the southern boundary to help soften the edge of the development and strengthen the buffer to the road. Further woodland in the northern parcel which is noted as a SANG would be welcomed.

✗ This comment does not appear to have been addressed and justification for why would be welcomed.

- 8) There are number of key corners noted on the 'Parameter Plan - Storey Heights' drawing however if all these corners have the same 2.5 storey architectural response there is a risk these will create a homogenous response and not create a place with a memorable character that is easy to

navigate. The 2.5 storey precedents in the DAS do not seem to be turning and addressing corners well, and essentially a 2 storey house with dormer windows. Please refer to pp57-61 of BfHL 'Easy to find your way around'.

Recommendation: The corners are significant and their architectural quality must be clearly articulated, with each designed to be distinctly different through a variety of possible approaches. A potential architectural response here could be a 3 storey building as per the precedent below or it could be a change in architectural language. All key corners should demonstrate they are buildings which turn the corner with windows to habitable rooms rather than blank gables.

It could be helpful to highlight a second tier of key corners which emphasises more critical nodes in the townscape to aid legibility. Please see markup below of one possible selection of key corners proposed.

The parameter plan needs to include greater detail on how these corners will be articulated to define the design quality at reserved matter stages.

✓ The proposed increase to 3 storeys at key corners is noted and may provide an appropriate response in certain locations. However, the original comment was not intended to prescribe a uniform 3 storey solution for all identified corners.

The primary concern relates to the architectural articulation, prominence and legibility of key corners within the townscape. A variety of approaches could be employed to achieve this, including but not limited to increased height. Changes in architectural language, landmark buildings, distinctive roof forms, enhanced frontage treatment, variations in massing, materials, detailing, or other design measures that clearly define and address corners would also be welcomed.





A key corner at the Stirling prize winning Goldsmith Street – Norwich, which rises to 3 storeys and addresses both sides.

Conclusion

On the whole, the scheme raises concerns with regards to ensuring design quality is retained at later application stages. Changes to the landscaping strategy and integrating green and blue infrastructure into the streets would be a welcomed approach to SUDs, whilst also having the positive benefit of aiding legibility and character.

In order to achieve a distinctive new development that is line with CP57 and BfHL, the architectural character needs to be developed and communicated to avoid creating a residential development that is generic and does not relate to the locality. Given the site is not allocated for development, design quality must be high here and it is recommended that the team engages with the design review process to ensure high quality design is delivered.

The submitted amendments are welcomed and show the application is moving in a positive direction. I trust the applicant can review the comments in blue and make any further refinements as appropriate.

The most significant issue that remains to be addressed is the use of disconnected private drives, which represent a poor urban design outcome and create an inconvenient environment for walking, wheeling and cycling.

Further consideration is also required regarding the design and integration of the attenuation basins. Clear design principles should be established at this stage to ensure these features function as attractive, multifunctional green infrastructure and do not become overly engineered drainage features that detract from the quality of placemaking and landscape character.