

Land off Windsor Drive,
Devizes

**Response to
URBAN DESIGN COMMENTS**

(PL/2026/02930)

August 2026



1. *Introduction*

This Response has been produced by Robert Hitchins Limited to respond to the Wiltshire Council Senior Urban Design Officer's consultation comments, dated the 4th June, 2026, relating to the planning application at Land off Windsor Drive, Devizes (ref: PL/2026/02930).

It is considered that the matters raised by the Urban Design Officer can be appropriately addressed through the Reserved Matters stage. The indicative masterplan, submitted with the application, and supporting information contained within this document demonstrate one potential approach to how these design principles could be successfully incorporated into the development.

This document should be read alongside the submitted Design and Access Statement (DAS) and the comprehensive package of supporting information accompanying the planning application, including the relevant technical and environmental assessments.

2. Design Information

	WDG - Design Objections	ROBERT HITCHINS - DESIGN RESPONSE
1	The proposed layout is overly reliant on cul-de-sacs, creating dead ends where turning heads and far ends are not visible from the junction with Windsor Road. This is contrary to the Wiltshire Design Guide (WDG 5.1.8), which states that cul-de-sacs should be short and have their far end visible from a through-road junction. This approach would also conflict with Core Policy 57 (vii) and (ix), as it would undermine legibility and accessibility. The reliance on vehicle reversing and turning at the ends of cul-de-sacs to serve dwellings and refuse vehicles, together with the proliferation of communal bin collection points, has the potential to create avoidable inconvenience for residents. Such an arrangement aligns with Building for a Healthy Life examples of “what red looks like” (pp. 18–19), rather than the preferred “what green looks like” (pp. 16–17), which advocates well-connected streets at the edges of developments. The cul-de-sac-led structure also undermines the ability of the proposed street network to function as a clear and legible hierarchy, as primary and secondary routes frequently terminate rather than forming connected through-routes. BfHL (p.17) also discourages extensive use of private drives, which can frustrate pedestrian and cycle movement, particularly along site edges. Recommendation To comply with the WDG and Core Policy 57, an internal loop should be formed removing the long cul-de-sac and improving legibility and permeability. Private drives should be removed where possible and if required take the form of an edge lane, please see design guidance noted in SfHL p.53-59. The lane should form part of a connect route for pedestrians and cyclists into development from the south west corner.	The WDG does not preclude the use of cul-de-sacs and the illustrative masterplan has sought to ensure that these remain limited in length, with turning heads visible from the adopted street network. The internal loop suggested by the Urban Design Officer has been specifically tested against the site's topography. This demonstrated that the shallowest gradient achievable for the affected part of the development would be approximately 12.2% (1/8). This significantly exceeds the 8% (1/12) practical maximum identified at paragraph 8.4.2 of Manual for Streets: Wider Application of the Principles, which also identifies 8% as the maximum gradient that a manual wheelchair user can negotiate. The suggested loop would therefore introduce unnecessary accessibility and engineering constraints to the site. The proposed movement structure instead responds to the site's physical constraints through a combination of adopted streets and shorter private drives. Private drives are not the predominant form of access and form part of a deliberate hierarchy of street types, allowing variation in width, landscape treatment, materials and character. Pedestrian and cycle connectivity is nevertheless maintained. Routes from the adopted streets connect towards the crossing of Windsor Drive, and there is also the opportunity to provide an informal pedestrian route through the public open space towards the south-western corner of the site. The precise alignment and landscape treatment of this connection can appropriately be developed at Reserved Matters stage. Accordingly, the absence of the suggested vehicular loop is a direct response to the site's topographical constraints rather than a failure to consider permeability.

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2	The DAS identifies legibility as a key objective; however this is undermined by the deliberate use of curving streets to create an 'organic' layout. This approach conflicts with best practice guidance, which emphasises direct and clearly aligned routes to aid navigation and wayfinding. As set out in Building for a Healthy Life (pp. 57–61) and WDG 4.2 and 5.1, legibility is best achieved through straighter, more direct streets. The immediate local context of Windsor Drive should not be used as a design precedent. Recommendation Amend streets to be straighter to aid legibility and navigation.	The applicant does not agree that the illustrative masterplan is characterised by an unnecessarily curvilinear street pattern. The majority of routes within the development are straight; the principal change in alignment occurs along the main access street. This alignment performs a number of functions. Manual for Streets (paragraph 7.4.3) advises that straight and uninterrupted links should generally be limited to around 70m where a design speed of 20mph or less is sought. The main access street extends for approximately 280m and an entirely straight alignment would therefore create a lengthy uninterrupted route. Changes in horizontal alignment provide an inherent traffic-calming function and reduce reliance upon engineered measures such as vertical deflections. The alignment also responds to the site's topography. For approximately 170m the principal street nevertheless maintains a clear, legible alignment and is reinforced by a 2m landscaped verge with avenue tree planting. This combination of street alignment, landscape structure and differentiated street character will assist wayfinding and establish a clear principal route through the development. Legibility should therefore be considered through the combined effect of route hierarchy, landscape, frontage and movement rather than street geometry in isolation. Further detailed differentiation of the street hierarchy can be secured through the Reserved Matters process.

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3	The play area is situated in an undesirable location being located next to Windsor drive and lacking sufficient screening. This risks creating a play space which is not well used as it is unlikely to encourage activity, play or social interaction. Due to the location this could end up aligning closely with 'red' examples in BfHL of poorly performing incidental spaces, rather than the preferred green approach of well-overlooked open spaces that contribute to legibility, neighbourhood identity and encourage activity. Please see a 'green' example from BfHL below which shows a street which is deliberately wider incorporating green space and play between homes. Worth noting this also adds variation to the streets, creating a place of memorable character which aids legibility for people. Recommendation: It is recommended that the play area is repositioned to a more appealing location. One possible solution could be to adopt a strategy like the above precedent and organise homes around a green area which incorporates green and blue infrastructure as well as a play area. Introducing greater multi functional landscape areas into the development would help improve legibility by creating a break in the streetscape. This would also be an attractive and memorable landscape feature to orientate houses around, please refer to p57 of BfHL. Please see screenshot/markup below indicating a multifunctional green space at the heart of the scheme.	The location of the play area has been informed by the physical characteristics of the site rather than being treated as incidental residual space. It is located within public open space where it has the potential to be linear in shape following the contours of the site. It is also positioned alongside the pedestrian/cycle connection across Windsor Drive, making it readily accessible to both new residents and the existing community. Importantly, the space is capable of being overlooked by both proposed and existing dwellings, providing natural surveillance consistent with WDG 7.1.5. It's detailed landscape design can incorporate additional planting to provide an appropriate degree of separation and screening from Windsor Drive whilst retaining visibility and surveillance. The applicant therefore considers that the current indicated location provides the more appropriate response to accessibility and natural surveillance. The detailed design of the play space can appropriately be resolved at Reserved Matters stage.

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4	As with point 3, more information is required to demonstrate the streets are contributing to the character and place in accordance with WDG section 5 Movement or BfHL 'what green looks like' pages 52/53 and pages 64/65, 'Well defined streets and spaces' and 'Healthy Streets'. The Design and Access Statement describes a hierarchy of primary, secondary and private drives, but this is not clearly expressed in the indicative masterplan, where routes of similar width, alignment and enclosure perform different roles. The proposed street hierarchy remains descriptive rather than functional, with insufficient differentiation between street types in terms of enclosure, frontage and alignment. The avenue trees are welcomed however trees should not be limited to the avenue alone and are encouraged on all the streets unless there are clear justifiable reasons why this would be inappropriate. Please see NPPF section 136. Worth noting trees play an important role in climate mitigation allowing shading to both street and adjacent homes. Currently the design also relies on the similar house types in different conditions which is also contributing to a degree of homogeneity in the street scene. See below in which the same two types are being used in different street conditions and where the character could be different. Recommendation: • More street trees should be introduced. • Greater difference between the character areas to be introduced, as noted with point 3 this could be done by incorporating a larger green area on the main avenue street. To ensure greater variation in street character it is suggested that the houses towards the west adopt a different character. One possible solution could be a farmstead typology which would be reflective of the rural transition on this boundary. Furthermore, the current layout does not adequately respond to pedestrian desire lines. To avoid frustrating pedestrian users, private driveways should connect, this could be for pedestrians only and not vehicles but clear legible sightlines should be present. See also SfHL Edge Lanes/Private Driveways (page 53). While the DAS describes a hierarchy of street types, there are no clear parameter plans to secure how these will differ in width, enclosure, frontage or character. As such, the hierarchy is not embedded within the masterplan and may not be realised at reserved matters stage.	The illustrative masterplan establishes a clear three-tier street hierarchy proportionate to the scale of the development, which comprises only 40 dwellings: 1. Main street – the principal movement route serving the majority of dwellings, characterised by avenue tree planting and a 2m landscaped verge along a substantial part of its length. 2. Secondary street – a lower-order residential route whose character is influenced by its relationship with the proposed woodland planting. 3. Private drives – lower-order, more informal routes serving limited numbers of dwellings and contributing to the transition towards the landscaped edges of the development. The applicant accepts that this distinction can be further reinforced at Reserved Matters stage through detailed consideration of street width, surfacing, landscape treatment, enclosure, building typology and boundary treatment. In particular, additional street tree planting along the southern private drive adjoining the public open space and play area would further distinguish its landscape character. The house types illustrated on the masterplan are indicative rather than fixed proposals. Consequently, the illustrative repetition of individual house types should not be interpreted as establishing the eventual architectural character of the development; greater variation in dwelling type and detailed architectural treatment can be developed at Reserved Matters stage. The suggested connection between the two private drives has also been tested but would require a gradient of approximately 12.2% as a consequence of the site's topography, please refer to comment 1 where this is discussed in more detail. A connection in this location would therefore not provide an appropriately accessible route. The applicant consequently considers that an appropriate movement and character hierarchy has been established at outline stage, with sufficient flexibility retained for its detailed expression to be developed through Reserved Matters.

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5	The design move to place buildings perpendicular to Windsor Road is understood for numerous reasons however it does create design challenges which the applicant should aim to address. There is a risk that the gables indicated below could be blank facades which would not be acceptable as they either front onto the main access street into the scheme or onto Windsor Drive and therefore this should be addressed. The potential for blank gables risks aligning with ‘what red looks like’ in BfHL page 55. This is further noted within the WDG, point 4.2.8 ‘Where buildings are on a corner both public elevations should be designed as ‘frontages’ and have windows from habitable rooms in them’. Recommendation: Please see below a scheme in Cambridge which successful turns a corner and has gables that address the side street, note how the entrance has moved around the corner in this situation and a balcony has been provided which helps provide activation. Parameter plans should be included which specify key strategic design moves including active gables to these locations as this is key to creating successful placemaking in this instance.	The applicant agrees with the principle that elevations addressing public streets and spaces should be appropriately active (i.e. not a blank facade). The units positioned perpendicular to Windsor Drive are intended to be dual-fronted dwellings, with enhanced side elevations incorporating fenestration and architectural detailing to provide overlooking and visual interest to both Windsor Drive and the internal street. The indicative masterplan does not prescribe detailed house elevations and therefore should not be interpreted as proposing blank gables in these locations. The detailed disposition of entrances, habitable-room windows and other architectural features is a Reserved Matters consideration and provides the opportunity to ensure that these prominent elevations positively address the public realm. This principle can therefore be secured and developed through the subsequent Reserved Matters submission.
6	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. At present, it is unclear how SUDS will meaningfully contribute to placemaking or street character. Recommendation: SUDS should not be engineered features and currently the basin indicated could form an overly engineered and unattractive feature which detracts from the quality of placemaking required by CP57. As noted SUDs should be better integrated into the streets.	The attenuation basin should not be considered in isolation. As set out in Section 7 of the submitted Flood Risk Assessment and Drainage Strategy, the drainage strategy proposes a SuDS train comprising a range of measures which may include rain gardens, swales and permeable paving in addition to the attenuation feature. The northern attenuation area also provides an opportunity to combine drainage with habitat creation and biodiversity enhancement, enabling it to form part of the wider green infrastructure network rather than functioning solely as an engineered drainage feature. The detailed form, planting and landscape integration of these features will be developed at Reserved Matters stage. There is therefore sufficient scope within the proposed drainage and landscape framework to achieve the multifunctional green and blue infrastructure sought by the WDG and Building for a Healthy Life.



- KEY
-  VIEW ALONG STREET
 -  PLAY AREA
 -  POTENTIAL INFORMAL LINK
 -  STREET TREES

Indicative Public Open Space plan

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7	The provision of woodland planting along the southern and eastern 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. Currently the landscaping along Windsor Drive appears insufficient to create a substantial and effective buffer to the road. The space between hedge and homes also needs to be better defined as this risks becoming a low quality leftover space. Recommendation: It is recommended that woodland planting be added along Windsor drive that would form an attractive and effective buffer to the road. The space between property and hedgerow needs to be better defined by the material submitted.	The applicant agrees that additional tree planting along the Windsor Drive frontage would strengthen the landscape character of the development and provide an enhanced green setting to this edge of the site. This principle can be incorporated into the detailed landscape proposals at Reserved Matters stage. The precise species, density and arrangement of planting, together with the treatment of the space between the road and proposed properties, are detailed landscape matters and can appropriately be resolved through the Reserved Matters submission.
8	Currently the scheme is not offering any wider connections, particularly to the public right of way on the eastern boundary. The current layout also limits future adaptability, restricting the potential for onward connections to adjacent land and preventing the formation of a coherent wider movement network. Recommendation: The scheme should make better connections to the existing PROW and this would also create connections to future schemes to the north/ north east if they are progressed.	In response to the Urban Design Officer's comments, the applicant has shown a potential informal pedestrian connection between the development and the Public Right of Way towards the centre of the eastern boundary. This would provide a connection from the development to the existing Public Right of Way network and, in turn, link with the pedestrian route crossing Windsor Drive. The potential connection would also help facilitate wider pedestrian connectivity towards any future development to the north and north-east, should this come forward. The indicative public open space plan (opposite) therefore demonstrates how improved east-west pedestrian permeability could be achieved.

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9	The arrangement of buildings and frontage conditions raises concerns in relation to the Building for a Healthy Life “Back of pavement, front of home” principle, particularly where boundary treatments and active frontage are not clearly defined. Boundaries to blocks are indicated with a brown line but this is ambiguous and detail is required to confirm the material quality and structure of this. The DAS refers to CA1 ‘Fringe development’ having soft boundary treatments so this should be clarified. Recommendation: The submission of parameter plans which define boundary treatments is recommended.	The illustrative masterplan establishes differing frontage conditions which respond to the character and context of different parts of the site. Along the principal street there is the potential for linked garages and some terraced units to provide a stronger and more continuous frontage, reinforcing enclosure and definition of the street. Towards the more sensitive landscape edges of the development, a more fragmented built form allows increased opportunities for tree and shrub planting and provides a softer transition between the development and the countryside edge. This differentiation is intentional and allows the development to transition from a more clearly defined residential street character internally towards a softer and more landscape-led character at its edges. The detailed specification of boundary treatments, including their materials, height and relationship with individual dwelling frontages, will be developed through the Reserved Matters process. These detailed proposals can ensure that boundaries reinforce the intended distinction between the principal street, secondary routes and landscape edges whilst maintaining appropriate definition between public and private space.

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10	Conclusion Overall, the proposed layout does not yet demonstrate compliance with CP 57, the Wiltshire Design Guide, or Building for a Healthy Life. While the DAS states that a ‘well-connected movement network’ is proposed, this is not supported by the indicative layout. The reliance on cul-de-sacs, limited connections to the wider network and absence of clear through-routes indicates that connectivity is constrained rather than well-integrated. Furthermore legibility is undermined creating a street network that is not easily understood. The street hierarchy described in the Design and Access Statement is not convincingly expressed in the layout, and opportunities to create well-defined streets, meaningful landscape focal points and high-quality public spaces have not been fully realised. In addition, the siting of the play area, the limited integration of SUDS, and the lack of clear connections to surrounding routes and public rights of way further weaken the scheme’s ability to deliver a cohesive and well connected place. The absence of sufficient design parameters for key frontages and streets also creates uncertainty that the reserved matters stage would secure an appropriate level of quality. As such, the scheme in its current form fails to achieve the standard of design and placemaking required and should be revised to deliver a more legible, connected and characterful development which responds positively to its context and accords with design guidance.	The applicant considers that the illustrative masterplan represents an appropriate and proportionate response to the opportunities and constraints of the site. In particular, the movement structure and disposition of development have been informed by the site's topographical constraints. Alternative connections suggested by the Urban Design Officer have been tested and, in key locations, would result in gradients of approximately 12.2% (1/8), (substantially exceeding the practical maximum identified within Manual for Streets) and would also likely create additional engineering plot abnormalities. Notwithstanding these constraints, the scheme establishes a clear hierarchy of movement, provides pedestrian and cycle connectivity towards Windsor Drive, incorporates substantial public open space and green infrastructure, provides a well-overlooked play area on an accessible part of the site, and establishes a landscape-led framework capable of further enhancement through detailed design. A number of the matters raised by the Urban Design Officer relate to the detailed expression of the development — including house types, active elevations, street trees, boundary treatments, detailed SuDS design and landscape character. The applicant has identified how these matters can be appropriately developed and secured through the Reserved Matters. The applicant therefore considers that the concerns raised do not demonstrate that the development is incapable of achieving a high-quality, legible and characterful place. Rather, the submitted masterplan provides a robust framework within which the detailed design principles identified above can be successfully developed at Reserved Matters stage.

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