

Wiltshire Council Planning Consultation Response

URBAN DESIGN

Officer name:

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Application No: PL/2026/04502

Proposal: Full planning application for the demolition of existing dwelling ('Uplands') and erection of 40 dwellings with associated public open space, landscaping and sustainable urban drainage system. Removal of existing access and provision of new replacement vehicular access to West Ashton Road.

Site Address: Uplands, West Ashton Road, Trowbridge, BA14 6DW

Case Officer: Verity Giles-Franklin

Reference:

Application Files indexed 07.09.26

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 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.

Objection

The application has been reviewed against the policy and guidance stated above including the design objectives of Core Policy 57, the Wiltshire Design Guide, the National Design Guide and the principles set out within Building for a Healthy Life (BfHL). Whilst the proposal demonstrates some positive attributes, there are a number of significant urban design concerns which are outlined below.

Reasons

- 1) The submitted layout is heavily reliant upon private drives and cul de sacs. This represents a poor urban design response, creating a weak movement structure with limited permeability and does not create a legible hierarchy of streets and therefore conflicting with Core Policy 57 (vii) and (ix).

As noted in the Wiltshire Design Guide, (WDG 5.1.8) Cul de sacs should be short and have their far end visible from a through road junction. Sections 4.2 and 5.1 of the WDG encourage perimeter block structures, connected streets and the avoidance of layouts that rely excessively on cul-de-sacs and disconnected private drives. The reliance on vehicle reversing and turning at the ends of cul-de-sacs to serve dwellings and refuse vehicles has the potential to create avoidable inconvenience for residents.

Building for a Healthy Life also identifies cul-de-sac dominated layouts, excessive private drives and disconnected movement networks as examples of poor design outcomes that weaken legibility and permeability.

Recommendation

To comply with the WDG and CP57, the road network should be amended to reduce the length of cul de sacs and branching private drives off them, enabling their far end to be visible from the junction with the main spine road. A simpler, more ordered layout of housing is one possible solution that may assist in creating more legible and easy to navigate streets (please see sketch markup below). The corners onto the spine street could become special ends, with small changes in height or architectural character to accentuate their importance. This is something noted in Buildings for a Healthy Life 'image 129' p.74 and in the National Design Guide p.20. Special corners can also assist with legibility and creating memorable recognisable landmarks.



- 2) The proposed development currently lacks a clear and distinctive architectural strategy and does not adequately demonstrate how it responds to the character, identity and local vernacular of Trowbridge. Whilst the Design and Access Statement identifies nearby suburban housing estates as key contextual precedents, it is not considered that these examples represent an appropriate benchmark for achieving the high design standards sought by Core Policy 57, the Wiltshire Design Guide and the Building for a Healthy Life principles. The presence of such development within the surrounding area should not, in itself, be taken as justification for replicating similar forms of design, particularly where they exhibit characteristics commonly associated with generic suburban layouts, that could be found in almost any location across the country.

The town contains a rich variety of historic and locally distinctive building forms which provide a stronger basis for informing development proposals. In particular, many traditional buildings within the local area demonstrate a characteristic palette comprising smooth-faced natural stone to principal elevations with red brick employed to side and rear elevations. Material traditions like this contribute significantly to local character and provide opportunities for contemporary interpretations which help to embed a development like this in its context.

The architectural detailing of the proposed dwellings is also considered generic and does not appear to draw meaningful inspiration from the character of Trowbridge. Whilst the submitted house types incorporate some variation in materials, they lack the richness and local references which would help them respond to local distinctiveness. As demonstrated in the example below, Trowbridge has many high quality examples which feature elements such as square bay windows, decorative archways, and porches between bays which help to contribute to a considered, and articulated elevations.

Core Policy 57 requires development to respond positively to its context and create a strong sense of place through high quality design that reinforces local distinctiveness. Similarly, the Wiltshire Design Guide promotes locally responsive design solutions that draw upon the defining characteristics of place rather than relying solely on standardised housing products. Building for a Healthy Life identifies the creation of 'Memorable and Characterful Places' as a fundamental

component of successful placemaking and encourages schemes to establish a clear identity that could not readily be replicated elsewhere. In its current form, the development does not yet demonstrate these qualities.

Recommendation

A more robust character assessment and architectural analysis should be undertaken to identify the defining architectural features, materials and detailing found within Trowbridge. This analysis should then clearly inform the design of the proposed dwellings, demonstrating how local precedents have been interpreted in a contemporary manner to create a development that is distinctive and rooted in its Trowbridge context. Such an approach would better align with the objectives of Core Policy 57, the Wiltshire Design Guide and Building for a Healthy Life, and provide greater confidence that the development will positively contribute to the character and identity of the area.



An example of a semi detached house in Trowbridge which demonstrates Stone front façade and brick to the rear/ sides. Note also the bay window design and integrated porch



This development nearby in Holt highlights a contemporary but characterful approach, with window proportions and spandrel panels between and below windows helping to create a well composed and distinctive elevation.

- 3) The development currently appears as a largely self contained enclave with limited consideration given to future connections beyond the application boundary. Particular concern is raised regarding the eastern edge of the site where opportunities for future pedestrian and cycle connectivity have been missed. New developments should make efforts to encourage active travel and currently by not connecting to the eastern side towards Leap Gate the development. Connections across the waterway to the south public footpath would also be encouraged to help improve the wider connectivity into the site and active travel routes.

Wiltshire Design Guide paragraph 5.1.9 specifically states that opportunities should always be sought to connect proposed roads and footpaths into adjacent areas and that layouts should allow future connections even where adjoining land is not currently available for development.

Whilst ownership and delivery considerations are acknowledged, development should still aim to integrate with neighbouring land and connect to existing routes and infrastructure. Encouraging active travel is also of importance, as noted in BfHL page 24, active travel 'improves public health, cuts congestion, reduces carbon emissions and boosts local air quality.'

Recommendation

The applicant should demonstrate how the layout has been designed to allow future connections beyond the site boundary, particularly along the eastern edge, ensuring that the development can integrate with future growth and movement networks. If this is not possible then clear justification must be given as the site is currently a hidden enclave which is inconvenient and awkward to access if approaching from Leap Gate.

- 4) There are a number of corner plots occupy visually prominent positions but fail to adequately address both frontages.

In particular, Plot 13 and Plot 40 appear to present largely inactive side elevations to the public realm. These locations perform an important wayfinding and placemaking role and should contribute positively to street enclosure and natural surveillance. It is acknowledged that some plots have a window added to the gable however this is small and often not in key habitable spaces like a living room or kitchen. Activating gables works best when the windows are larger and serving rooms as noted above.

Recommendation: Plot 13 and Plot 40 should incorporate additional corner windows and dual-aspect treatments to provide active frontages on both elevations, increase natural surveillance and reinforce their prominence within the street network. These windows should be larger and serve more active habitable rooms such as kitchens or living spaces ideally. Bay windows and oriel windows can also be utilised effectively to add variation, decoration and variety across the development which helps to raise the architectural quality to be more in line with the expectations of CP57.



The Wiltshire Design Guide makes reference to the use of large windows to habitable rooms above.

- 5) The relationship between parking and built form is not always successful. It is acknowledged that a mixture of strategies have been utilised, and this is a welcome approach, however there some instances where these harm the quality of the scheme.

Wiltshire Design Guide paragraph 5.4.4 states that on-plot parking should not dominate the front elevation of dwellings. Building for a Healthy Life similarly identifies frontage parking that dominates the street scene as a poor design outcome. This can be softened by landscape and WDG notes that each plot should have a 0.5m strip of landscape to do so.

There is also a risk that by relying on tandem parking this can cause antisocial parking around the development as noted below in BfHL.



Recommendation

To improve the overall design quality of the development, the parking strategy should be refined to ensure that parked vehicles do not dominate the streetscape and that greater emphasis is placed on landscape led design. In accordance with the Wiltshire Design Guide and Building for a Healthy Life principles, frontage parking should be softened through the introduction of generous planting and landscape buffers, with a minimum 0.5m wide landscaped strip provided adjacent to on-plot parking wherever practicable. This would help integrate vehicles into the street scene, improve visual amenity and reinforce the green character of the development. Further opportunities should also be explored to incorporate unallocated on-street visitor parking within the street network to avoid anti social parking. Reducing the reliance on tandem parking is also encouraged. Collectively, these measures would strengthen the relationship between buildings, landscape and parking, resulting in a higher quality and more characterful residential environment.



In this scheme landscaping has been used successfully to conceal and soften the impact of parked cars.

- 6) The development includes a number of rear and side parking arrangements that appear to have limited natural surveillance.

Wiltshire Design Guide paragraph 5.4.9 states that rear parking courts should be small, well overlooked and designed to maximise natural surveillance. Building for a Healthy Life similarly identifies poorly overlooked parking courts as poor urban design practice.

It is worth noting that rear courts should be avoided where possible as these are inherently inefficient spatially due to the additional access space required to reach the parking spaces, but if required should follow the guidance described by the supporting documents above.

Recommendation

Generally speaking, rear parking courts should be avoided but where necessary, the applicant should demonstrate how parking courts are positively overlooked by active habitable room windows and integrated into the wider streetscape. Parking, What Works Where should be consulted which contains several recommendations for rear parking courts, notably the use of landscape. Clear justification should be provided to explain the need for a parking court when these are inherently inefficient spatially.



- 7) The drainage strategy appears heavily dependent upon attenuation basins rather than a fully integrated SUDS led approach.

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.

Building for a Healthy Life identifies an over-reliance on engineered attenuation basins, and the failure to integrate drainage features into the wider landscape, as indicators of poor design quality.

From the drawings, it is unclear whether the attenuation basin will require a knee rail. If so, this would further reinforce the engineered appearance of the feature and represent a missed opportunity to deliver a more integrated and attractive SUDS solution, resulting in a poor urban design outcome.

Recommendation

The applicant should explore greater integration of rain gardens, swales and street-based SUDS features which would have a positive benefit on the placemaking of the development. Benefiting the placemaking

A plan identifying boundaries and knee high rails should be provided also.

A greater number of street trees are encouraged to the secondary streets, and the preference for these would be within the public realm rather than private. Trees have the benefit of also providing shading in summer to both properties and public realm.

- 8) As raised by the Environmental Agency, the Sites flood risk differs on the environment agency's flood risk maps and this should be clarified. Whilst the FRA proposes raising the access road above the modelled flood level, it remains unclear how safe access and egress will be maintained during exceedance events, blockage scenarios or future climate change conditions. Further information should be provided to demonstrate that the development remains safely accessible throughout its lifetime and that emergency service access can be maintained during extreme flood events.
- 9) Concern is raised regarding the proposed use of reconstituted stone. Whilst its use is not inherently unacceptable, the quality indicated within the submitted material palette does not appear comparable to the natural stone that is characteristic of many traditional buildings within Trowbridge and the wider Wiltshire area and risks creating a generic housing development. The Wiltshire Design Guide promotes the use of materials that respond positively to local character and distinctiveness, notably locally sourced natural stone (10.3.3). It is not presently evident that the material strategy will deliver the level of architectural quality required by CP57 or contribute positively to the creation of a memorable and characterful place as advocated by Building for a Healthy Life. Should planning permission be granted, conditions should be imposed requiring the submission and approval of brick, stone and roofing material samples to ensure that the final development achieves an appropriate standard of design quality and local distinctiveness.
- 10) There are numerous gardens which appear to have insufficient garden depth and these should be amended to suit. WDG. Point 9.2.2 states 'In general, a north facing garden for a typical 2 storey house should be minimum of 12m long or up to 15m long for a typical 3 storey house'. Plot 28 currently has a depth of approx. 4.7m. Plots, 3, 4, 5, 11, 12, 10, 9, 8, 18, 17, 29, 30, 33 should be reviewed in light of the above. More generally, other gardens which are not north facing should be reviewed also to ensure they meet 10m recommended by Wiltshire Design Guide.

Summary

Whilst it is acknowledged that the applicant has sought to address a range of technical and design considerations, the scheme remains heavily influenced by a conventional suburban development model characterised by cul-de-sacs, private drives, standardised house types and engineered drainage infrastructure. As currently proposed, the development does not fully demonstrate the high-quality,

locally distinctive and landscape-led approach expected by CP57, the WDG, the National Design Guide and BfHL.

The principal concerns relate to the weak movement hierarchy. The scheme would benefit from a simpler layout which would aid legibility and in turn reduce the usage of cul de sacs and private drives. The absence of a compelling architectural response to the character and vernacular of Trowbridge is also a key concern.

Amendments should seek to reduce the reliance on cul-de-sacs and private drives, establish a stronger architectural identity informed by Trowbridge's vernacular, improve active travel connections, strengthen key corners and landmark locations, integrate SuDS throughout the street network, enhance the quality of landscape and parking design, and ensure private amenity space and material quality meet the expectations of adopted guidance. It is encouraged that the applicant engages in the design review process noted in the first section of the response.