

	<b>South Gloucestershire Council</b>
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<b>Telephone</b>	<b>01454 863545</b>
<b>Application Number</b>	<b>P22/01300/O</b>
<b>Description</b>	<b>Erection of up to 180 dwellings, a local shop and associated infrastructure (Outline) with access to be determined; all other matters reserved</b>
<b>Address</b>	<b>Land At Sodbury Road Wickwar South Gloucestershire GL12 8PG</b>
<b>Date</b>	<b>20/04/22 14/04/23</b>
<b>Case Officer</b>	<b>Jon Ryan Charmian Eyre-Walker</b>

The following are urban design comments on the above application. A site visit was carried out on 19<sup>th</sup> April which has informed these comments.

**Comments dated 14/04/23 in purple below.**

**One of the main issues from previous comments focussed on the provision of a shop. Just based on the information set out in the DAS, there is no viability or supporting evidence. Is there a way to secure the shop under this Outline permission? Certainly, need to secure an area within which a future shop could realistically be provided. Page 82 of the DAS provides some information relating to the shop but nothing definitive or persuasive.**

**In terms of referring to the DAS under Condition, I would only recommend doing that if the DAS sets out appropriate design principles and materials. Detailed comments on the DAS have been provided given that the applicant has requested that it be included in a permission under a Condition. As the DAS stands, I would recommend that it is not included, or that various changes are made first.**

**Page 19 DAS – Buthay Lane extends behind the High Street, not just focussed on the southern end.**

**Page 20 – built form – longer terraced rows of houses but each house has a clear vertical separation, having been built at different times, including varying window forms and positions. Displays the classic organic character. Highlight the way in which the separate terraced rows have exposed and visible end gables which define the street and spaces between rows. The pitched roof forms are also noticeable where taller roofs sit adjacent to lower roofs.**

**Page 24 – Under the ‘roofs’ heading, need to highlight that one of the main characteristics is that gables are highly visible, either where facing directly onto the lane or when viewed between gaps in the built form. This is a clear difference between the High Street and Lanes character. The existing text for Back Lane needs to be amended. Highlight stone combined with brick quoins and window surrounds as a strong reference.**

**Page 26 – For Amberley Way, under the Urban Form heading, need to mention long stretches of inactive sides of buildings or rear gardens defining the public realm. The use of materials and overall character does not respond to the historic character of Wickwar (the High Street or back lanes).**

**Page 27 – Under the ‘roofs’ heading, need to note that most of the properties either have some form of gable feature facing the front, or the end gable can be clearly seen from areas of public realm.**

Page 29 – useful photo page with associated colour palette.

Key to this site is finding ways to create different character areas, not just basically the same style, heights and approach to parking across the whole area. There have to be clear differences, principally between the primary route through the site and development which defines the open countryside.

The Building Heights Parameter Plan on page 59 is broadly acceptable. The previous text does refer to 2.5 storey buildings being located in nodal spaces and along the primary street, but this may need to also be noted on the actual plan itself.

Need to introduce more apartments – not to necessarily increase density, but to respond to the huge affordability crisis in the housing market. Need to introduce choice in a wider range of housing types and sizes, not predominantly 3 and 4 bed houses.

Page 61 – shows a new Zebra crossing and bus stop, both of which are positive.

The Street hierarchy diagram on page 63 is logical. However, consideration should be given to segregated cycle lanes.

NDG Para 82 – *‘Priority is given to pedestrian and cycle movements, subject to location and the potential to create connections. Prioritising pedestrians and cyclists mean creating routes that are safe, direct, convenient and accessible for people of all abilities. These are designed as part of attractive spaces with good sightlines, and well-chosen junctions and crossings, so that people want to use them.’*

NDG (Page 25) – good practice example of a dedicated pedestrian and cycle route separated from vehicles.

Numerous other guidance points towards either the separation of cycle movement away from vehicle movement and that where this doesn’t occur, people are far less likely to choose to cycle, particularly families with younger children.

Page 66 – Shared streets – need to add in the following points which need to be considered when designing shared spaces within South Gloucestershire. This whole section will need to be amended as it does not incorporate many of the critical issues and features which are essential in any shared space setting.

Design of the shared space should be an integral and parallel process to design of the residential layout with the objective of creating a very low traffic speed (<10mph design speed), interesting and safe public realm incorporating space for an occasional substantial street tree or cluster of trees.

- Generally, serve less than 100 dwellings. Use of shared space should be considered carefully as a tertiary part of a hierarchy of streets. Manual for Streets advises that they are most likely to work well in short lengths or where they form cul-de-sacs, where the volume of traffic is below 100 vehicles per hour.
- Some variation in width based on a predominantly 6.5m wide carriageway (3.5m Fire appliance/refuse truck + 1m safety margin + 2m excavation/service margin). 6m wide where serve less than 10 dwellings (to allow for reversing).
- Shared space streets must have a clear entrance threshold such as Copenhagen style crossings and demarcated by a change in materials.

- Traffic calming must be a maximum of every 30m (typically a build out with tree and change in material. Raised table tops may also be used and often at junctions).
- Surfacing should be distinct from other highway typologies. Suggest a minimum of 50% block paving to tarmac (use of hot rolled asphalt with a colour chip can further help define these streets). Carefully specify block and colour chip to reinforce character areas and distinguish streets.
- Integrate parallel visitor parking (2.5m wide) and subtly demarcate in a different material.
- Use Conservation kerbs: 125mm upstand to prevent unauthorised parking and vehicle overrun, 25mm elsewhere.
- Carefully consider the build line set back (at least 1.5m) and front boundaries/gates to create safe thresholds that prevent direct stepping onto the shared space.
- Avoid thin strips of kerb and hardstanding (block or tarmac) alongside the shared space that could be interpreted as footways. Planting strips to sides of house walls should be a minimum of 600mm wide to allow adequate space for soil between footings & kerb haunching to accommodate planting (shrubs and hedge etc is preferred to grass to reduce maintenance and vehicle overrunning where these are conveyed to households).

Key points here are that shared spaces must feel and function as different types of spaces to create lower vehicle speeds and a safer environment, and a range of critical measures are needed to achieve that aim.

Page 65 – Is there any way to also incorporate trees within the ‘Primary streets with rain gardens’ cross-sections? All streets must be tree-lined but it would be sensible to suggest that fewer street trees could be provided if rain gardens were also provided.

Page 67 – shared drives – again, this page needs to incorporate the main features of shared spaces but given these shared drives are in all cases located adjacent to either countryside or GI/green open spaces, they should create a different character to the often more urban shared surface streets. It would be sensible to incorporate a different approach to planting and landscaping, and possibly different palette of paving materials, all of which would compliment the different approach to architecture in these areas. The use of black estate railings and stone boundary walls for example, could be a strong reference to a more rural character.

Page 70 (onwards) – Character and Appearance.

There are two main approaches to defining character in these sorts of developments. The first is to link the street hierarchy (primary, secondary, shared spaces) to character, street design and materials, whereby a specific set of features is applied to each category, so that a legible series of spaces is formed. The second approach is to create distinct areas (as shown on page 71), each with their own character or identity, not tied to street hierarchy. Both approaches can work well, the main thing to achieve is a well-designed scheme which uses high quality and appropriate materials and finishes.

The main issue with the approach set out in the DAS is that essentially all the different types of spaces are treated in the same way within each of the three main character areas. The streets would align with each other across the development, but the architecture and materials would be defined by area. This doesn’t respond to either the historic settlement pattern of Wickwar or the new development approaches on the eastern side of the main road. The approach in the DAS tries to combine the two approaches by treating the green edge as a distinct character which runs across all areas.

As such, there is something of an overall hierarchy to the scheme (particularly in terms of streets), and opportunities to create distinct character areas. The DAS establishes the critical difference between the green edge areas and the rest of the development. There are, however, a number of issues with each character area, as follows.

Page 72 – the recurring use of the recon stone image is not positive and looks very much like a concrete product. I would suggest that a different image is used, of either a natural stone, or a much better recon stone. It is acknowledged that natural stone will likely not be applied to all suitable properties, but we need to make sure that it is used on the key buildings and the best quality recon in other areas. It is good to see images of pantiles and plain tiles.

While not a big issue, the two smaller diagrams on page 73 could be a bit more representative of low and moderate densities – they are almost exactly the same and the low-density example should probably have more garages. The main image is useful, but we need to be really careful about agreeing to accept this DAS under Condition unless the applicant adds text to the effect of ‘this is an illustrative diagram only’. The other thing to add is that the diagram shows a couple of large, detached properties with hipped roof forms, but we really shouldn’t be using that approach given the context.

Page 74 – while the photos are useful as a reference, the use of a palette of coloured renders is completely inappropriate in this area, in terms of the material and tones. Render is one of the worst materials in terms of on-going maintenance and staining and really turns into a liability for residents. It would be much better to use a grey/buff multi brick as the primary facing material for this character area (as a reference to the natural stone and lighter renders), with natural stone to key plots. This would differentiate this character area from the Orchard View area and the Southern Gateway to the south.

Page 75 DAS – Again, same issue with recon image and need caveat for main diagram.

Page 76 DAS – The use of a combination of red/orange brick and render is not locally distinctive. A better approach would be to use a natural or recon stone applied to primary facades, with a red/orange brick to sides, rear, finished into quoins. Stone should still be one of the primary materials.

Page 78 DAS – the main materials should be natural stone and timber, not render and red brick. The Green Edge should be referencing the rural or countryside vernacular and/or the really interesting and traditional materials found in the back lanes of Wickwar and also offers an opportunity to add a contrasting material. Red brick could be used as a detailing material, to quoins, window and door surrounds.

Roof materials should be clay pantiles, not grey concrete tiles. The two photos are not appropriate for this character area and should be replaced.

The following is a summary of the distinct materials for each character area.

Orchard View – Natural stone, recon stone, and scattered render

Development Core – Grey/buff/light multi brick, natural stone (a more modern style)

Southern Gateway – Natural stone, some red/orange brick combined with render

Green Edge – Timber, natural stone with red brick detailing

Boundary treatments also need to be referenced in the DAS and the use of estate railings around green edges, and stone walls within scheme, would be supported.

Page 82 – the information provided within the DAS to support the inclusion of the shop is very limited.

Page 83 – under the secure by design section, the first bullet point should reference that only solid construction boundary walls will be accepted where an area of public realm sits adjacent to a private boundary. Defensive planting could also be used to enhance security and add to landscaping.

Page 84 – while I would of course defer comments on technical open space requirements to colleagues, there is an issue of the on-going maintenance of the areas of POS by future residents. This level of on-site provision could burden future residents with a significant financial liability. The pattern with this type of greenfield development is to provide as much POS as possible, partly to respond to the general countryside context, but also to make the passage through the planning process smoother, with officers, Members, and local people.

While responding to the landscape and open character of the area is critical, the maintenance liability cannot be ignored, particularly with the numerous nation-wide issues around management companies and the way that charges increase sharply over time. This issue is particularly concerning for the proportion of affordable properties and if the issues around management company contributions might also apply to those properties, making affordability even less viable for those residents. The use of private drives, while not objectionable, will also add to the area covered under the management company.

The other significant issue here is that most of the open space shown on the plan are attenuation basins which may not be usable for large parts of the year, depending on the detailed design.

### Conclusion

While only Access is being sought for permission, the principle of this scale and use of development is also the key issue to determine. My original comments (in black above) raised serious concerns regarding the overall sustainability of the development, given it's location, issues around walking conditions towards the town centre, the lack of evidence to support the inclusion of a viable convenience store, and the implied impact that this car-based development would have.

Unless there is an actual mechanism which ties the permission to the provision of a convenience store, any housing development in this area should be seen as car-based, and therefore unsustainable.

There are still a number of significant issues relating to the presentation of proposed materials within the design statement, and their quality and appropriateness. As I have said above, I would support referring to the DAS under Condition if the DAS was acceptable. However, further work is needed in this area.

There is a real danger that this development will simply be another standard housing scheme, with no real distinctiveness or reference to the positive local vernacular or development patterns. There is very little in the DAS that explains how the local character has been used, in terms of development pattern, typologies and materials. This is perhaps one of the critical issues for the next stage of the planning process (Reserved Matters or a Full application).

From an urban design perspective, I would still raise an objection based on the content of the DAS (the design of the scheme) and the lack of convincing evidence around the provision of the convenience store (affecting the principle of development). There are certainly various ways in which amendments can be made to deal with many of the comments raised and I look forward to assessing further submissions.

### **Policy background**

While I will defer to policy comments from planning policy colleagues, there are a number of key policies, both local and national, which fundamentally affect this application and development of the proposed site. The key local policies are CS1 'High Quality Design', PSP1 'Local Distinctiveness', and PSP11 'Transport Impact Management'. The key national policies include the National Planning Policy Framework and the National Design Guide.

In terms of the key policy issues, the most pressing is the lack of local convenience store and post office. While there are other facilities, such as a community centre, primary school, pub and café, it is the lack of food shopping provision which causes the biggest issue. In effect, residents living in this proposed development will be almost completely reliant on the use of private vehicles to access necessary daily and weekly food sources. A bus service does exist and it is possible to cycle, but this lack of key local facilities means that the sustainability of the development as a whole is brought into question.

In particular, it is PSP11 which applies here. Given the lack of the key local facilities, this application is not policy compliant. The issue of private vehicle trips and a lack of sustainability is particularly important given that the Government and South Gloucestershire Council have declared Climate Emergencies (<https://www.southglos.gov.uk/environment/climate-change/climate-emergency/>).

Connected to this issue is the lack of detailed or convincing information relating to the provision of a convenience store and therefore lack of access to key services and facilities (PSP11). This will be a car-dependent development. Merely stating that the application includes the potential provision of a new convenience store is insufficient to base a positive decision on, given that this facility could easily not be provided due to a lack of demand or unfavourable market conditions. The proposed location of shop makes sense from a visibility perspective but is positioned at nearly the far southern point of the site area, at the point furthest from the existing built-up area. While this location would benefit the population in the immediate vicinity, it would be less accessible to the population to the north.

Another related issue is the lack of suitable pedestrian connections to the centre of Wickwar (referred to with PSP11 para 5.23). While the literal proximity of the centre is relatively close, the quality of the route is poor. There are narrow pavements along much of the route, very close to sometimes fast-moving and heavy vehicles, and there is a need to cross the main road at various points due to pavements abruptly stopping with no easy crossing points. All these factors combine to create access issues.

The development site is also outside of the Wickwar settlement boundary. New development has also not been previously granted on the western side of the B4060, as far north as the Wickwar Youth Centre, and there is a clear development divide visible across the eastern and western sides of the road. The new developments on the eastern side of the road combine to form an elongated and ribbon-like form of development which reaches past the comfortable limits of the central area.

### **The design and access statement**

In terms of the information set out within the design and access statement, it refers to the March 2012 NPPF but the latest version is dated July 2021. There is no mention of the National Design Guide. There is no mention of PSP11 'Transport Impact Management'. The final paragraph on page 11 trails off with no end.

There is a general lack of detailed information in terms of how the proposed number of units can be accommodated within the site. This is needed to ensure that the number of dwellings can in reality be accommodated. For example, it is customary for Outline applications to provide indicative layouts which demonstrate the deliverability of the numbers of dwellings. This process also allows the slightly more strategic road layout to be tested and ensures deliverable blocks.

There is a lack of thorough context and character appraisal. The character appraisal (page 18 of the DAS) focusses on the High Street but the back lanes (Buthay and Back Lanes) are equally locally distinctive and contain numerous interesting and locally distinctive features. The site visit identified clear positive character features, including hierarchy of development pattern and principal materials. Although illustrations provide some context, photos would be more helpful.

Back Lane and High Street natural stone.

Above: The best locally-distinctive materials found locally include natural stone, brick detailing, timber cladding and clay tiles.



New-build details from the housing developments to the east of the application site. The above photos show the use of natural stone, which is positive, while the bottom images show recon stone of varying quality.

As an overall approach, it is better to primarily reference the best and most significant local character elements, then take account of modern features. This will provide a stronger baseline to create more locally distinctive design. For example, for Wickwar, the historic High Street and back lanes should be used as the primary reference, in terms of the forms, materials and approach to hierarchy, with the more modern developments perhaps contributing in terms of the use of natural stone and some detailing and other materials. Natural local stone should be the primary building material, in combination with brick and possibly timber cladding, with some render. It is also worth noting that the two other developments (Bellway and Linden Homes) to the east of the B4060 were permitted pre-NDG and latest NPPF.

The general arrangement of parcels within the site makes logical sense, with green buffers to the sides of the existing GI and another buffer along the western edge. The two access points would allow for a circulation through the site and could help spread the intensity of traffic on each junction at peak travel times.

Page 47 of the DAS sets out the building heights but is very general. It essentially says that the whole development (except the retail use) could be up to 2.5 storeys. While I would not object to the use of 2.5 storey elements, these should be focussed along the primary circulation routes, and at the end of terminal vistas, with lower, mews and more standard house types off the primary route and to the rears of the principal dwellings, which would reference the historic development patterns found locally. This approach should be linked with the street hierarchy information, provided in subsequent pages.

The street hierarchy information is sensible and sets up the opportunity to create a more legible scheme. Requirements for shared space routes should include varying paving materials, such as more textured block paving, attention to natural landscaping features, a comfortable distance between front doors and carriageways (for safety).

Page 58 sets out criteria for the primary corridor. The first bullet point states 'generally consistent in urban form'. With reference to the historic core of Wickwar, there is very little consistency in terms of forms, either building facades, materials or roof forms. There are clear vertical separations visible and that fine organic grain is one of the key character elements both here and within most historic settlements of this type and age. That sense of variety and interest is critical to achieve.

This page also notes 'predominantly brick with feature render plots to key buildings'. This approach is not supported by evidence from the historic character of Wickwar, where the principle and best building material is natural stone. The most interesting features combine stone, brick detailing (quoins and doorway/windows surrounds) and timber. Render is seen along the High Street and within the modern developments, but the natural stone anchors the settlement and when combined with boundaries finished almost exclusively in natural stone, this gives a clear indication of the approach which should be taken. Key listed buildings are also all natural stone.

Roof tiles are indicated as finished with grey, but again, this is not supported by the locally significant built forms, which are generally finished in terracotta, either as pantiles or double Roman tiles.

Page 61 provides a snapshot of what looks like a more developed layout for the site. This information in its entirety is needed to demonstrate that the proposed numbers can be accommodated on the site and that the amenity of future residents will not be harmed.

Page 67 indicates that most of the green buffer along the western edge of the site will need to accommodate a large attenuation basin. Clearly the design of this basin will need to be carefully considered as this could conceivably eliminate a significant proportion of the site from everyday use and impact on the open space provision.

Boundary treatments are critical and the use of stone walling is one of the most obvious local references and this should be consistently provided within the site. The boundaries, street design and building form all need to be considered together. For example, stone walls could be provided with hedging behind which in time would grow and combine to form a positive impression, which combines definition, local materials and a softer element.

Any solar panels should be set within roofs of darker grey material only, not terracotta. PSP6 'Onsite Renewable and Low carbon Energy' requires major greenfield development to reduce CO2 emissions by a further 20% via use of renewable and/or low carbon energy generation sources.

Boundary walls should be the same as the principal material of the house. The only exception to this is the use of red brick boundary walls where the principal house material is off-white render, but as noted above, the focus should be on natural stone.

Parking: Again, this needs to be linked to the movement and built form hierarchy, with the higher-density approaches along the primary route and lower-density towards the edges. Where parking will be provided on both sides of the primary route, it is sensible to indicate different approaches to parking, as this will help reduce the visual impact within the streetscene. For example, where perpendicular frontage parking is provided on one side of the street, on the opposite side, parking between buildings would reduce visual impacts.

Electric car charging needs to be carefully considered at this stage to make sure that both below ground and above ground infrastructure is provided and designed in.

Bin collection: ideally for terraced properties, bins should be stored and accessible from the fronts of properties, designed into high quality storage enclosures which would ideally combine with a porch canopy. This would avoid the need to bring waste bins either through the house or insecure back alleys.

The location of the shop makes sense from a visibility perspective from the main road but it is positioned at nearly the far southern point of the site area, at the point furthest from the existing built-up area. While this location would benefit the population in the immediate vicinity, it would be less accessible to the population to the north. Given the lack of safe crossings, this is a further issue.

#### **Design Review Panel advice**

As you know, the NPPF supports LPAs utilising Design Review Panel services and have regard to the outcomes from these processes. The Design West Panel (<https://www.designreviewwest.org/about>) gives the council and developer partners access to, and the benefit of, an advisory panel of built environment experts, selected depending on the nature of the scheme and stage in the design process. It may be appropriate to suggest that this application be reviewed by the panel.

*129. Local planning authorities should ensure that they have access to, and make appropriate use of, tools and processes for assessing and improving the design of development. These include workshops to engage the local community, design advice and review arrangements, and assessment frameworks such as Building for Life<sup>47</sup>. These are of most benefit if used as early as possible in the evolution of schemes, and are particularly important for significant projects such as large scale housing and mixed use developments. In assessing applications, local planning authorities should have regard to the outcome from these processes, including any recommendations made by design review panels. (Para129 NPPF)*

**Summary**

As set out above, there are numerous identified issues, some of which could be dealt with through the design process, but some which are more significant. The lack of existing local key facilities, principally a convenience store, is a real issue. I cannot realistically see how the application can be seen to be acceptable without even this most basic local provision. The lack of any evidence to suggest a new convenience store in the location proposed would be a realistic proposition, demonstrates the issue. This results in an in-principle objection. The accessibility and design issues, combined with a lack of information upon which to properly assess the application, results in an objection.

**Many thanks,**

**Matt Haslam**  
**Senior Planning Officer (Urban Design)**