

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 04 December 2025 17:16  
**To:** Planning  
**Subject:** 3/2025/0801 FAO Kathryn Hughes  
**Attachments:** AK Objection Supporting Site Layout Annotation 3\_2025\_0801.pdf; AK Objection Document 3\_2025\_0801.pdf

**Importance:** High

**⚠ External Email**

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Hi Kathryn

Please find attached documents relating to planning application 3/2025/0801. For ease of reference, the text is also copied below, though the attached version allows you to review the content and images more clearly.

Given the proposal as submitted, and noting that the changes required to make it acceptable would fundamentally alter the application and its description, I wish to formally register my objection on design grounds.

Please be in touch if you have any further questions.



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To be read in conjunction with annotated site plan.

I want to write in to oppose an application on the grounds of overdevelopment and poor design quality. The scale of the scheme is excessive relative to Wilpshire's identified housing need, representing urban sprawl rather than sustainable growth. The housetypes and boundary treatments are generic, volume-builder in style, and rely on poor materials, failing to achieve local distinctiveness or meet the high-quality standards required by local or national planning policy.

**Housing Needs**

Wilpshire is identified as a Tier 1 village, but the housing requirements for this community are limited. According to the Council's housing figures, only 32 new dwellings were needed in Wilpshire for the plan period up to 2028. This scale of development is clearly far beyond what is necessary for local growth. The Core Strategy's vision was for gradual, sustainable development; this project represents an overdevelopment of the site and the village. The site could support a more legible, organic response with much larger dwellings by significantly reducing the quantity of dwellings.

**Greenbelt**

Blackburn with Darwen's proposed 1,500 houses on Brownhill Drive risks coalescence between Brownhill and Wilpshire, removing the clear gap between the two areas and creating urban sprawl that undermines the purpose of the Green Belt. Taken together, these cumulative pressures change the planning context and increase the harm of any large-scale scheme in Wilpshire.

On appeal the inspector found the principle of residential development acceptable, judged the proposed scale and density to be appropriate, accepted split-level dwellings as reflecting nearby built form, and concluded there would be no harm to the adjacent Green Belt. These findings are material and reduce the weight of a blanket objection on Green Belt grounds. However, the inspector's conclusions do not remove the need to consider cumulative effects, landscape and settlement pattern impacts, and whether the scheme reinforces or diminishes local distinctiveness.

### **Infrastructure**

Are any tangible improvements proposed to the highway network beyond the standard developer contributions? The railway station remains basic, yet with the scale of additional housing it should be upgraded to meet demand. Traffic conditions at Whalley Road and Longsight Road are already severe, particularly at peak hours, and this scheme—alongside Blackburn with Darwen's allocation site—will add pressures that existing infrastructure cannot reasonably accommodate.

### **DESIGN**

#### **Planning Policy**

A development should be rejected if its design is of poor quality, does not contribute positively to the local context, or fails to respond appropriately to the surrounding environment. High-quality design is essential in ensuring that developments enhance the area and provide lasting value to the community. A design that fails to respond to the specific characteristics of the site, its surroundings, or the historical context can result in an insensitive development that detracts from the local area. Developments should improve the image of the area. Poor or unremarkable design that does not elevate the local image or contributes negatively to the streetscape could be rejected.

The NPPF places significant emphasis on the creation of well-designed places that promote a sense of place, are functional, and are sustainable. The revisions to the NPPF in July 2021 establish very clearly that development which is not well designed should be refused, and conversely, significant weight should be given to development which reflects local design policies and government guidance on design. The December 2023 revisions cemented the role of beauty in placemaking and the planning system, with Chapter 12 now seeking to achieve well-designed and beautiful places. In support of this, the Government has produced a suite of guidance documents including Building for a Healthy Life (BHL), the National Model Design Code (NMDC) and the National Design Guide (NDG) which form a material consideration in the assessment of the design of development proposals.

NPPF Paragraph 135:

- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;

#### **BHL**

BHL states that the use of positive characteristics such as street types, landscape character, urban grain, plot shapes and sizes, building forms and materials being used to reflect local character are features which contribute to well-designed places.

The planning authority should not simply take what has been presented as fact; the proposal fails on:

- Making the most of what's there
- Creating places that are memorable

- Well defined streets and spaces
- Cycle and Parking
- Over reliance on integral garages with frontage driveways
- Frontage car parking with little or no softening landscaping
- Views along streets that are dominated by parked cars, driveways or garages.
- Poorly resolved changes in level.

The application is unfortunately demonstrating the below:

- Using a predetermined sequence of house types to dictate a layout
- Attempting to create character through poor replication of architectural features or details.
- Arranging buildings next to each other in a way that does not create a cohesive street scene
- Referencing generic or forgettable development nearby to justify more of the same
- Broken or fragmented perimeter block structure.
- Presenting blank or largely blank elevations to streets and public spaces.
- Staggered and haphazard building lines that are often created by placing homes with a mix of front and side parking arrangements next to each other.
- Street corners with blank or largely blank sided buildings and/or driveways. Street edges with garages, back garden spaces enclosed by long stretches of fencing or wall
- Single aspect homes on street corners.

## **Design**

### **Site**

The opportunity for a path connecting to the public right of way east of the site (3-46 FP 25) is welcomed, but internal pathways for walking and cycling appear secondary or overlooked, undermining permeability and sustainable movement through the development.

The entrance and arrival experience is dreadful. On approach, the left-hand view is dominated by a substation and blank side/rear elevations, while to the right the immediate outlook is a pylon structure. This creates one of the weakest entrances I have seen in a housing development, failing to establish a welcoming or legible gateway. Furthermore, pylons are not shown in many of the submitted elevations, which is misleading and masks the true impact of the site's arrival sequence. The northern portion of the site appears more organic and, despite the poor design and materials of the housetypes, this part of the proposal sits more comfortably within the setting as it benefits from adequate screening and a landscape-led approach. By contrast, the southern portion is over-constrained, with layouts that feel forced and lacking in flexibility. The omission of several plots in this area would ease these concerns, allowing the layout to breathe, improving overall legibility, and creating a more balanced development.

The Suds pond – is this actually able to be used by residents? Are there walking routes through the green area? Or is it in reality going to just act as a big pond of rainwater gathering

### **Affordable Homes**

Scattered across the site, the dwellings are poorly designed and leave inadequate amenity space. They are not tenure blind, with house types clearly distinguishable in the street scene due to plot size and limited amenity provision, failing to achieve organisation and integration as required by BHL guidance.

In the architect's own words, "the 2021 application layout was dominated by frontage parking and set out a simple road hierarchy" — yet this weakness has not been addressed, particularly in the northern portion of the site, where frontage parking continues to dominate and the hierarchy of streets remains simplistic and unrefined. This results in a scheme that lacks cohesion, undermines legibility, and falls short of good design practice.

### **Housetypes**

#### **SEE SUPPORTING IMAGE**

The proposed house types are generic and reminiscent of a volume housebuilder, lacking the bespoke qualities needed to establish a distinctive identity. They fail to create a positive new

character or enhance local distinctiveness, resulting in a development that neither reinforces existing character nor contributes to a sense of place.

Elevations are bland, with limited articulation and weak detailing, producing a visually uninspired outcome. Although the split-level element references local context, it is undermined by poor design and material choices. Without emphasis on craftsmanship and a site-specific approach, the scheme falls short of the high-quality standards required by policy and diminishes the intrinsic character and beauty of the area.

### **Materials**

Materials should be high quality, robust, sustainable, and appropriate to context, creating continuity with neighbouring buildings. The proposal lacks strong architectural design and undermines local distinctiveness. The absence of precedents reinforces that these housetypes are predetermined prototypes, justified regardless of context.

The DAS states *“The more traditional housing stock tends to utilise stone as the primary material”* and it is clear that areas which have regained architectural character over the years include stone-faced dwellings and those displaying architectural detail. The proposed development does not demonstrate these positive features and instead draws more heavily on modern, newer developments with limited architectural character. The housetypes are generic, reminiscent of a volume housebuilder, with no dwellings proposed in stone-faced materials, no use of natural slate, and no incorporation of the attractive stone boundary walls characteristic of Wiltshire. This absence of contextual materials and detailing undermines local distinctiveness and fails to respond appropriately to the established character of the area.

Detailing such as surrounds is included but limited to standardised cills and lintels, offering little architectural richness. There is a lack of precedents or built examples that demonstrate a thoughtful reinterpretation of detailing, reinforcing the impression that the housetypes are generic prototypes rather than context-led designs.

### **Roofs**

#### **SEE SUPPORTING IMAGE**

The proposed dwellings suffer from a poor roof-to-wall and window ratio, resulting in elevations that are visually dominated by roof massing. This imbalance creates an obtrusive and disproportionate appearance that does not reflect high-quality design.

Where roofs are made such a dominant feature, higher-quality materials such as slate would be expected. Instead, the proposal relies on weak, low-grade materials that further diminish the character of the scheme.

Contextual examples where dormers and roof prominence occur are typically within lower-scale bungalows, where the overall height mitigates the visual impact. By contrast, the proposed 2.5 (in reality 3) storey dwellings exaggerate the roof dominance, producing elevations that are out of keeping with their surroundings.

Collectively, the combination of poor proportions, inappropriate contextual response, and cheap roof materials results in roof-dominated elevations that are visually displeasing, unnecessarily obtrusive, and diminish the quality of housetypes across the site.

### **Dormer**

Dormers on the principal elevations often appear top-heavy and can read as tacked-on extensions rather than integrated elements. They increase perceived mass at first-floor/roof level and can unbalance carefully composed façades. They certainly look like tacky add-ons in this proposal, adding to the already discerning composition of roof types across the scheme.

Where street elevations are consistent and unified, front dormers can interrupt the strong horizontal/vertical relationships that form a coherent street composition. Dormers can introduce complex junctions (roof-to-wall, flashing, sill details) that are often the weakest points for weathering and visual finish. In practice, site-led value engineering frequently leads to weaker quality materials and finishes that contrast with the primary façade materials and reduce overall build quality. There is nothing in this application or Persimmon's previous projects that would suggest otherwise.

## **Garages**

The application makes very weak references to local context. Reliance on integral garages is presented as a design response, yet this is inadequate. In the surrounding area, integral garages occur uniquely on split-level dwellings such as at Woodcrest, where houses retain character and are suitably spaced. By contrast, the proposed layout is confused, combining townhouses, split levels, and over-dominant frontage parking, all forced into a prototype housetype from the Persimmon range. This results in a scheme that lacks coherence, fails to reflect contextual design quality, and diminishes the character of the site.

## **Boundary treatments**

Boundary treatments are poorly considered. Even where hedges are used, they sit against tall gated ironmongery fences. The site is dominated by retaining walls, reducing garden practicality, and many dwellings face further fencing typical of tightly packed new builds, failing to protect amenity and design quality.



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Barnwood House Type,  
Ashchurch



Staunton House Type,  
Norfolk



Greenwood House Type,  
Coventry



Seacombe House Type, Leicestershire  
Wentwood bungalow, Holdingham



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