

Swindon Core Strategy Proposed Submission - Comments Summary and Proposed Changes

<i>Respondent Ref</i>	<i>Comment No.</i>	<i>Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
2	1	2.3	GI Strategy		Para 2.3 could usefully include a map showing woodlands - Fig 7 shows only Ancient Woodlands as these relate to heritage but in the context of 2.3.5.1 and the work of the Community Forest partnership, a woodland context map would be appropriate. Equally, such a map would fit within 2.4.1.	
2	2		GI Strategy		Figure 10 should include accessible woodland, e.g. Nightingale Wood, Purton Woods.	Figure 10 should include accessible woodland, e.g. Nightingale Wood, Purton Woods.
2	3	3.2	GI Strategy		The table omits Energy Crops/Biomass from Environmental Services. These have a potential contribution to Climate Change mitigation that needs to be recognised. They do appear late in the document but deserve mention here.	
2	4	3.3.1	GI Strategy		The Woodland Trust's Woodland Access Standard deserves mention here. If it is not being used as a part of identifying GI requirements, some reasons should be given. Swindon BC may not have included these as part of its adopted standards for open space provision but they are nevertheless relevant. The Forestry Commission and the Woodland Trust have produced a provisional inventory of accessible woodland in the UK. This data will be of relevance to the Swindon GI Strategy.	

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2	5	4.1	GI Strategy		It would be relevant to include here access created through agri-environment schemes (possibly also map this?) Agri-environment schemes will also play a key part in delivering biodiversity targets.	
2	6	4.5	GI Strategy		Para 4.5 could usefully include two sections, one referring to Climate Change Adaptation (flooding, reducing temperatures etc) and another referring to Climate Change Mitigation (Carbon storage, carbon reduction, reducing emissions etc). These are rather lost in the analysis at present.	
2	7		GI Strategy		Section 4 omits a specific and overt section on health benefits (as does appendix C). The role of a GI network in providing space for improving physical and mental health should not be underestimated or inferred. While there may be a temptation to 'mention everything' the absence of specific section on GI and Health is notable. Section 2 gives very brief background on obesity and heart failure but these are not developed on.	

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GI Strategy

Section 5 refers to the important role of trees and woodlands and the TCPA reinforces this in 'The Essential Role of Green Infrastructure: Eco-Towns GI Worksheet Advice to Promoters or Planners' with the quote "Altogether the provision of woodland can be a powerful mechanism for ensuring the local environmental quality and sustainability of eco towns". This raises a question about the integration of the Great Western Community Forest Plan - arguably a precursor to GI thinking (Section 1.3.1) - and the proposed GI Strategy. It may be that the GWCF team (responsible for producing the GI Strategy) is being unduly modest or has over-compensated its enthusiasm for woodland.

There is an opportunity to bring the two plans together, given that their objectives and delivery mechanisms will be so similar. Perhaps the Forest Plan should evolve into the GI Strategy, with an additional appendix covering those non-GI elements (tree cover and landscape targets). The Plan is now seven years old and arguably GI better describes many of its key purposes.

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2	9	6.1	GI Strategy		This section covers the 'Means of Delivery' and partnerships are identified as a central mechanism. What is less clear is who will lead and co-ordinate these partnerships. The Council 'owns' the Strategy but does it own leadership, management and maintenance. Or is there an existing structure? The Community Forest is quoted but the document seems to fight shy of actually saying the Community Forest team/partnership should continue to lead the GI Strategy's delivery. Whichever organisation is best placed to lead, it should be made clear as a key element of the Strategy's success.	
2	10	6.2.1	GI Strategy		Para 6.2.1 sets out the plethora of private, public and charitable sector resources that may be available to invest in and fund the development of GI. Again, the analysis is good but the conclusion for the strategy is less clear. Who will lead the bringing together of partner funds? How will these be managed? What mechanisms will be needed to ensure the effective management and maintenance of GI into the future?	

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2	11	6.2.2	GI Strategy		<p>Para 6.2.2 refers to Urban Trees and Green Roofs - it would be helpful to see Swindon adopt challenging targets for tree cover as in London (GLA (2009) Leading to a greener London - An environment programme for the capital). This states "Studies show that increasing tree cover by 10 per cent can reduce the surface temperature of a city by between three and four degrees centigrade. We aim to increase tree cover across London from 20 per cent to 25 per cent by 2025 - around two million additional trees -with a further five per cent increase by 2050. We will investigate the right places to plant trees to deliver the greatest benefits, complementing our existing work that has determined the right species of tree to suit local circumstances in the face of a changing climate".</p>	
2	12	6.3.2	GI Strategy		<p>Section 6.3.2 should refer to the SW Regional Woodland and Forestry Framework and its 2009-2012 Implementation Plan, both of which have specific actions relating to the role of trees and woodland in delivering GI.</p>	
5	1		CP7		<p>Large scale development proposed on the eastern side of Swindon will have a significant impact on Oxford shire, particularly in terms of traffic growth on the A420 and other roads. The Sustainable Movement and Transport Strategy is concerned with transport issues within Swindon and does not address traffic issues within Oxfordshire specifically, nor how this can be mitigated.</p>	<p>The Sustainable Movement and Transport Strategy needs to address the subject of traffic generation within Oxfordshire specifically, and how this can be mitigated. This should be seen as an essential part of the evidence base.</p>

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15		1	SSP7		The Government's White Paper "Communities in Control: Real Power, Real People" calls for local authorities to involve communities in the decision-making process. Policy SSP7 clearly conflicts with Government when 52,000 people have signed a petition in order to ensure that a 1km buffer of countryside is protected against development east and south of Coate Water Country Park. The council have ignored this.	Delete wording of SSP7 and replace with: i) Up to 10 hectares of land at Commonhead will be safe-guarded for future expansion of the Great Western Hospital. ii) Land between the hospital, Coate Water Country Park and the motorway is designated for its high landscape value, its special historic and literary quality and its potential ecological value. No development will be permitted iii) Land to the west of Day House Lane will be managed as a wildlife conservation area to add value to Coate Water SSSI, Coate Water Local Nature Reserve, Day Copse Local Nature Reserve and Burderop Woods North Local Nature Reserve.
15		2	SSP7		The policy is not justified - plenty of Brownfield alternatives exist to develop housing and employment land to meet government targets for Swindon. The land at Coate is more important to Swindon's future as an area of rural recreation and of high landscape value.	Delete wording of SSP7 and replace with: i) Up to 10 hectares of land at Commonhead will be safe-guarded for future expansion of the Great Western Hospital. ii) Land between the hospital, Coate Water Country Park and the motorway is designated for its high landscape value, its special historic and literary quality and its potential ecological value. No development will be permitted iii) Land to the west of Day House Lane will be managed as a wildlife conservation area to add value to Coate Water SSSI, Coate Water Local Nature Reserve, Day Copse Local Nature Reserve and Burderop Woods North Local Nature Reserve.

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15		3	SSP7		The proposal is inconsistent with the Council's previous commitment to protect this area from inappropriate development once the Great Western Hospital was built.	<p>Delete wording of SSP7 and replace with:</p> <p>i) Up to 10 hectares of land at Commonhead will be safe-guarded for future expansion of the Great Western Hospital.</p> <p>ii) Land between the hospital, Coate Water Country Park and the motorway is designated for its high landscape value, its special historic and literary quality and its potential ecological value. No development will be permitted</p> <p>iii) Land to the west of Day House Lane will be managed as a wildlife conservation area to add value to Coate Water SSSI, Coate Water Local Nature Reserve, Day Copse Local Nature Reserve and Burderop Woods North Local Nature Reserve.</p>
15		4	SSP7		It's not an effective policy. The area is remote from the main urban area of Swindon and cannot be integrated with the town. More land needs to be set aside for the hospital expansion to meet the health needs of a growing town.	<p>Delete wording of SSP7 and replace with:</p> <p>i) Up to 10 hectares of land at Commonhead will be safe-guarded for future expansion of the Great Western Hospital.</p> <p>ii) Land between the hospital, Coate Water Country Park and the motorway is designated for its high landscape value, its special historic and literary quality and its potential ecological value. No development will be permitted</p> <p>iii) Land to the west of Day House Lane will be managed as a wildlife conservation area to add value to Coate Water SSSI, Coate Water Local Nature Reserve, Day Copse Local Nature Reserve and Burderop Woods North Local Nature Reserve.</p>

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15		5	SSP7		It is not consistent with national policy – Delivering Sustainable Development (PPS1) – by virtue of the fact that the potential damage to the ecology, to an important literary landscape, to significant archaeological features, to strategic views from the North Wessex Downs AONB & Coate Water Country Park, to Coate Water SSSI and Day House Copse Local Nature Reserve cannot be secured.	Delete wording of SSP7 and replace with: i) Up to 10 hectares of land at Commonhead will be safe-guarded for future expansion of the Great Western Hospital. ii) Land between the hospital, Coate Water Country Park and the motorway is designated for its high landscape value, its special historic and literary quality and its potential ecological value. No development will be permitted iii) Land to the west of Day House Lane will be managed as a wildlife conservation area to add value to Coate Water SSSI, Coate Water Local Nature Reserve, Day Copse Local Nature Reserve and Burderop Woods North Local Nature Reserve.
16		1	SO7		The objective is too general and does not set out how and when the transport network will be delivered.	Rewrite the first sentence of Policy SO7 to read "A comprehensive and sustainable transport network will be developed ahead of anticipated growth making access efficient, safe, affordable and easy to understand."
16		2	CP7		There is a let-out in CP7ix) bullet 3 that states that commuted sums will be taken if applicable. This is a get out clause and if S106 does not pay for the transport network then who will pay?	
16		3	CP2	2.8	Whilst there is reference to the timely provision of infrastructure in paragraph 2.8, it is not included within Policy CP2.	CP2, after "provided" add "at the right time and in the right place"

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16		4	CP2A		It is unclear how demand for water supply will be met when the Abingdon Reservoir may be delayed beyond 2022 as indicated by criterion v). Criterion iii) is unclear how abstraction can be guaranteed given falling flow figures.	
16		5	SO1			SO1 should include a bullet: "Sustainable Use of Water Resources" and in the text add "By 2026 Swindon Borough will have become an exemplar sustainable community demonstrating conservation of water resources having exceeded etc."
16		6	CP4		There is a let-out clause so far as the provision of affordable housing is concerned relating to affordable housing provision, which is not consistent with the RSS.	Delete "unless viability and funding circumstances prevent this"
16		7	CP7		CP7 does not include a link from Wichelstowe across the railway line to Great Western Way although the Core Strategy stresses the importance of links between peripheral areas and the town centre. This is inconsistent with other policies including SO7, sustainability, climate change and the need for linkages. Para 3.34 states that the railway line severs central Swindon and overcoming this barrier is critical to regeneration.	Add to the list at CP7ix) "Wichelstowe to Great Western Way crossing the railway"
16		8	SSP6		CP7 does not include a link from Wichelstowe across the railway line to Great Western Way although the Core Strategy stresses the importance of links between peripheral areas and the town centre. This is inconsistent with other policies including SO7, sustainability, climate change and the need for linkages. Para 3.34 states that the railway line severs central Swindon and overcoming this barrier is critical to regeneration.	Add to SSP6 xii) "Provide a link crossing the railway" Paragraph 3.56 add "it may be necessary to have a link from Great Western Way to Wichelstowe"

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16		9	CP7		Under ix) 2nd bullet point it refers to necessary infrastructure however under CP2 it refers to developments that generate "a requirement". It is not clear how "necessary and appropriate" is decided and monitored, or what triggers a "requirement".	In ix) third bullet point take out the words "and if applicable" or explain what mechanisms it is calculated and monitored.
16		10	SSP7		Whilst there is a reference to a buffer at point ix) there is no detail as to how, and by whom, a "functional and robust" buffer will be decided. These are very subjective words and open to interpretation.	Describe the width of the buffer along the western edge of the area shown in Fig 15, and context.
16		11	SSP7		At x) is states that by respecting views it is possible to "minimise" the impact on the landscape character. This is contrary to Strategic Objective 8 where it is stated that growth must "respect and enhance the historic environment."	
16		12	SSP8		Bii) How will this requirement be controlled and monitored? There is no reference to timing and deliverability in balance with growth in the town centre. D) refers to early delivery, how will this not pre-empt applications to come forward in the Central Area?	Introduce a trigger mechanism which will cap the numbers coming forward in the EDA and hold them in check and in balance with applications for the Central Area in line with regeneration objectives.
16		13	DMP5		Believe that the expectations for transport delivery under this policy are unrealistic given the current economic situation. Believe that the transport strategy delivery through DMP2 or DMP5 undeliverable and unsound.	There should be alternative options available if insufficient funding is likely to reduce delivery of the transport strategy. Focus should be on delivering cycle networks and public transport.

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16	14		DMP8		Policy is welcomed but requires some changes to make it more robust.	Add an indication of widths of the corridors. Corridors to go around settlements in the countryside. Special mention of a wide buffer for Coate.
16	15	Part 5	Implementation		At para 5.2 there is reference to taking account of changing circumstances but there is no reference to monitoring showing the need for a review.	Add to point B Protects the Local Identity. Para 5.2 should clearly state that "as a result this document will show when there is a need for review."
17	1		CP2A		Paragraph 2.20 The sentence is misleading saying the existing Rod Bourne STW will reach capacity in about 2016. The STW will only reach capacity if further upgrades cannot be undertaken.	Amend the sentence as suggested.
17	2		CP2A		Paragraph 2.21 This paragraph should end after the second sentence i.e. after " it is assessing the most suitable options for STW provision in Swindon" . The remaining wording prejudices the outcome of phase 2 of the water Cycle Study.	Delete wording after the end of the second sentence.

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17	3	CP2A		It is essential to ensure that infrastructure is provided ahead of development either through phasing or the use of Grampian Style conditions in order to prevent detrimental impact on the environment - residential sewage flooding and watercourse pollution. Developers need to demonstrate that adequate capacity exists both on and off-site to serve the development so that it not lead to problems for existing users. Developers may have to carry out certain studies to determine whether the development proposal will lead to overloading of the existing water & sewerage infrastructure.	Change Policy CP2A to include: Where there is a capacity problem and no improvements are programmed by the water company, then the developer needs to contact the water authority to agree what improvements are required and how they will be funded prior to any occupation of the development.
17	4	DMP1		DMP1 Section 6 Sustainable drainage systems are not appropriate for use in all areas, for example, areas with high ground water levels or clay soils which do not allow free drainage.	This comment should be stated in the Core Strategy.
17	5	DMP1		DMP1 Section 11 We support the requirement for all new dwellings to meet the water usage targets set out in the Code for Sustainable Homes and that new dwellings should comply with the Code 3 rating as a minimum.	

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17		6	DMP1A		<p>Policy DMP1A should include reference to flooding from SEWERS and an acceptance that flooding could occur away from the floodplain as a result of development where off site infrastructure is not in place ahead of development.</p> <p>It is also important not to underestimate the time required to deliver necessary infrastructure. Local network upgrades take around 18 months and STW upgrades can take 3-5 years.</p>	Please amend to acknowledge the comment.
18		1	CP8		The policy omits any reference to the historic natural environment, which is an important part of cultural identity as set out in national and regional. For example, ancient/veteran/notable trees contribute to both culture and history.	We would therefore like to see an additional sub-paragraph in this policy stating 'protecting and enhancing existing, and creating new, historic natural environmental assets'
18		2	CP9		The policy omits any reference to the role that the natural environment can play in delivering physical and mental health benefits as set out in national and regional policy.	We would therefore like to see an additional sub paragraph along the lines of 'The Council to seek opportunities to use the natural environment including woodland as a health resource'
18		3	CP10		Sub-paragraph ii) should, as well as connecting and enriching biodiversity habitats, also seek to expand them as set out in priority BAP habitat targets of the UK Biodiversity Action Plan and required under Section 40 of the Natural Environment and Rural Communities Act 2006.	We would therefore like to see sub paragraph ii) of this policy to read 'connects, expands and enriches biodiversity habitats'
18		4	SSP8		Support sub paragraph Ci) and ii) which states that the EDA must be in accord with the GI strategy and must protect, enhance and integrate features of natural, historic and environmental importance, including mitigation measures as necessary.	

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18		5	SSP8		Pleased to see provision for measures to mitigate the impact of the EDA on the Woodland's Trust Warneage Wood in Wanborough, particularly with regards to public access. However, this area frequently suffers from storm flooding, thus mitigation works will be required to deal with the increased likelihood of storm run-off from the development site.	
18		6	DMP8		Sub-paragraph A, sub sections 1 - 4 This policy does not provide adequate protection for the ancient woodland or ancient trees in the Borough. There is no detail in Appendix 4 with regards to trees and hedgerows.	
18		7	DMP8		Subsection 3 Dealing with mitigation could result in loss of ancient woodland. In terms of compensatory measures, it is impossible to replace ancient woodland as this habitat has evolved over centuries.	Would like to see the Core Strategy contain a clear commitment to absolute protection of ancient woodland and ancient trees. An example of good wording is contained within the Northumberland National Park LDF, Policy 23. Further information is detailed on the original response.

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18		8		App2	<p>Appendix 2 does not include important regional and national documents which should inform the Core Strategy including:</p> <ol style="list-style-type: none"> 1. A Strategy for England's Trees, woods and Forests (DEFRA, 2007) 2. Deliver Plan 2008 - 2012 England's Trees, Woods and Forests (Natural England, Forestry Commission, 2008) 3. SW Regional Woodland and Forestry Framework 2005 (Forestry Commission, 2005) 4. SW Woodland and Forestry Framework Implementation Plan 2009-12 (Forestry Commission, 2009) 5. South West Biodiversity Implementation Plan (SW Regional Biodiversity Partnership) 	
18		9		App3	<p>Open Space Standards Consider that the Woodland Trust's Woodland Access Standard is an important policy tool to compliment other access standards used in the drawing up of the Core Strategy. The Woodland Trust Woodland Access Standard recommends</p> <ol style="list-style-type: none"> 1. That no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size 2. That there should also be at least one area of accessible woodland of no less than 20ha within 4km (8kn round trip) of people's homes 	Incorporate Woodland Access Standard

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18		10	GI Strat		Paragraph 2.3.3 Should incorporate a reference to ancient woodland in para 2.3.4. LPAs should identify any areas of ancient woodland in their areas that do not have statutory protection.	Would like to see ancient woodland and ancient trees reference in paragraph 2.3.4
18		11	GI Strat		Paragraph 3.2 At p45 we would like to see the 'potential benefits' column widened to include 'climate change mitigation and adaptation such as soil stabilization, flood amelioration and water quality'	We would like to see the above climate change wording included in the paragraph 3.2 (p45 table)
18		12	GI Strat		Paragraph 3.3 A complimentary standard to Natural England's ANGSt is the Woodland Trust's Woodland Access Standard. It is important to facilitate people's interaction with and access to the natural world as a means of improving their quality of life. The Woodland Trust Woodland Access Standard recommends 1. That no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size 2. That there should also be at least one area of accessible woodland of no less than 20ha within 4km (8kn round trip) of people's homes	We would like to see the Woodland Access Standard used as a tool in the development of the GI Strategy

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18	13		GI Strat		<p>Paragraph 4.2 We are pleased to support the woodland creation of 30% woodland cover across the extent of the GWCF territory in the GWCF plan. We support the Strategy's tree planting aspiration and would also like ancient trees mentioned in para 4.2.</p>	
18	14		GI Strat		<p>Paragraph 4.5 We would like to see reference to the ability of native woodlands and individual street trees to help mitigate the effects of climate change.</p>	We would like to see the role of woodland recognized in climate change mitigation and adaptation
18	15		GI Strat		<p>Paragraph 5.2 Support the important role of trees and woodland in green infrastructure.</p>	
18	16		GI Strat		<p>Paragraph 5.3 The Trust is pleased for its key woodland sites to play an appropriate role in this GI strategy. We are pleased to see Berriman's Wood feature as a case study in para 6.1.2</p>	
18	17		GI Strat		<p>We would like to see the GI Strategy to strongly highlight the need for appropriate funding and measures to mitigate the effect of increased usage on existing GI assets resulting from new development.</p>	We would like to see the Strategy highlight the need for revenue funding to protect existing GI assets and integrate them into a development driven by the GI Strategy.
24	1	xxvi	General		<p>The proposal to empower communities to identify and make key decisions can not help in this Core Strategy as the new 'Connecting People Connecting Places' strategy is not yet fully implemented and can not meet the deadline for comment of 21st September 2009</p>	
24	2	xxxii	General		<p>The Core Strategy is unsound because there has been no consideration of "reasonable alternatives"</p>	

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24	3	1.3	General		There has been woefully inadequate public consultation. Few people have access to the strategy documents and even less understand them. A series of public events should have been held to explain what is being proposed.	
24	4	2.3	CP1		These are visions not strategy. Para 2.3 says that "Swindon will enjoy an international reputation for innovation, science and technology", yet there are no practical suggestions for attaining these (e.g.. No mention of innovative pedestrian or vehicles solutions or air travel)	
24	5	2.5	CP1		This paragraph conflicts with the 2007 'Statement of Community Involvement'. There can be no genuine sustainability if the community have not been sufficiently involved.	
24	6	B	CP3		It is inevitable that out of town development will have a detrimental effect on town centre development, so this should negate the Council proposal for development at Coate. The Inspector and Secretary of the State decisions should also cause this proposal to be withdrawn.	
24	7	E	CP9		Given the expansion of Swindon to about 280,000 residents by 2026 either a second hospital will be needed or an expansion of much more than 5.5 hectares.	Given the expansion of Swindon to about 280,000 residents by 2026 either a second hospital will be needed or an expansion of much more than 5.5 hectares.
24	8	2.4	CP4		No mention is made of expansion to the villages around Swindon, and given the lack of remaining brown field sites, and the objections to major green field sites, this must be considered a reasonable alternative.	

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24	9	2.53	CP4		The term "intermediate housing" is a typical wording that means nothing to the public whom you (the Council) are inviting to comment.	
24	10	2.77	CP5		What policies/strategies are being offered to achieve more support for "secondary shopping".	
24	11	2.78	CP5		This strategy conflicts with the proposal to develop at Coate.	
24	12	3.5	SSP2		The figure of 36,000 dwellings by 2026 (which is an RSS requirement) should be vigorously challenged. The water, sewage, power and transport infrastructures are already under strain and will not be able to cope with an increase of up to 280,000 people. Water supply is not even mentioned on page 10 of the Implementation Plan.	The figure of 36,000 dwellings by 2026 (which is an RSS requirement) should be vigorously challenged. The issue of water supply is not even mentioned on page 10 of the Implementation Plan.
24	13	3.26	SSP2		The figure of 4,500 dwellings at Wichelstowe by 2026 is now unrealistic. The original plans showed a start date of 2004 and completion by 2022. As the start date was 2007, and as building ceased (apart from some in East Wichel), the likely completion date is now at least 2027/8.	
24	14	3.26	SSP4		The last sentence states that "old buildings should be protected and enhanced", yet there is no mention of the Mechanics Institute.	
24	15	3.27	SSP4		If the "Green Spine" is to be a genuine North-South route it should run from the town centre to the Wichelstowe new junction, not stop in Old Town.	If the "Green Spine" is to be a genuine North-South route it should run from the town centre to the Wichelstowe new junction, not stop in Old Town.
24	16	3.37	SSP4		After "South of the railway" add "including the Mechanics Institute".	After "South of the railway" add "including the Mechanics Institute".

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24	17		SSP6		A link from Croft Road is mentioned, but no reasonable alternative was discussed. A link across the area under or over the railway to Great Western Way, and a park and ride adjacent to it, would reduce pressure on Junction 16, and would avoid extra pressure at the bottom of Kingshill.	A link across the area under or over the railway to Great Western Way, and a park and ride adjacent to it, would reduce pressure on Junction 16, and would avoid extra pressure at the bottom of Kingshill.
24	18	3.59	SSP7		Para 3.59 conflicts with the Inspectors Report, and Secretary of the State decision, quoting the following reasons for dismissal of Appeals A and B. Appeal A: (a) The proposals fail to comply with Policy DS3 in three important aspects (DS3, b, e, and l). (b) Development in the Coate area would have adverse impacts on regeneration of the central area Appeal B: (a) Same reasons as above. (b) The lawfulness of Condition 29.1	
24	19	A	SSP8		At annex A of the Implementation Plan the total cost of the EDA infrastructure is £366m. How much of this is to be provided by the Central Government/Western Region Assembly, and how much by Swindon Borough Council?	
24	20	B. xiv	SSP8		Will the new Rapid Transport system and the new link to the EDA be over or under the A419?	
24	21	B. xv	SSP8		Where will the park and ride be situated? Is it to cater for traffic from the East or from North and South?	

<i>Respondent Ref</i>	<i>Comment No.</i>	<i>Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
24	22	12	DMP1		Reductions in CO2 emissions are proposed but there is no mention in reduction of, or measures to combat, particulates, particularly those from HGVs etc on motorways or other fast roads.	
24	23		DMP4B		There should be much stronger emphasis on safety. HMO's should be subject to initial and follow-up inspections by fire services and health authorities.	HMO's should be subject to initial and follow-up inspections by fire services and health authorities.
24	24		DMP4C		A paragraph should be added to cover the new requirements regarding access to all dwellings and buildings, particularly disabled for persons.	A paragraph should be added to cover the new requirements regarding access to all dwellings and buildings, particularly disabled for persons.
24	25	4.64	DMP6		This paragraph should be applied to the Mechanics Institute.	This paragraph should be applied to the Mechanics Institute.
24	26		DMP7		The needs of the community seem to have been overlooked, e.g. lack of community centres in major development areas will inhibit public consultation as part of Connecting People/Connecting Places and other initiatives.	
24	27	5.5	Implementation		How can the public have an input into the Board?	
25	1		General		Sport England has been working with SBC over the last 2 years to help develop a robust sports facilities strategy. The Core Strategy does not adequately acknowledge this document as part of the Evidence Base. It also fails to adequately reflect a number of key recommendations in the Strategy.	
25	2		App 2			This list needs to include the Strategy for Major Sports Facilities Provision (2009-26) as a key part of the Evidence Base.

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25	3		CP8			Reference should be made in para 2.120 to the Strategy for Major Sports Facilities Provision (2009-26) as part of the justification for this policy.
25	4		SSP8			We note that reference to the Strategy for Major Sports Facilities Provision (2009-26) is made in SSP6 clause ix). We would suggest that a similar clause needs to be added to SSP8 in order that the identified sports facility needs are secured as part of the development, along with the other infrastructure outlined in the policy.
25	5		App 2		Sport England has supported SBC in the production of an updated Playing Pitch Strategy. This provides a robust assessment of existing and future needs for playing pitches in the Borough. The Core Strategy does not adequately acknowledge this document as part of the evidence base.	The list in Appendix 2 needs to include the Playing Pitch Strategy as a key part of the Evidence Base.
25	6		CP10		I note from para 2.119 that playing pitches are covered in the 'Green Infrastructure' section of the strategy. However no mention is made of the Playing Pitch Strategy forming part of the evidence base for CP10.	Reference should be made in both the policy and the supporting text to the need to protect and improve the stock of playing pitches in the Borough, in line with the findings of the Council's Playing Pitch Strategy.

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29		1	SSP14		<p>In general the Core Strategy does not acknowledge the economic and environmental contribution that agriculture makes and would therefore recommend the inclusion of reference to food security, regulatory impacts, sustainable development and farm diversification.</p> <p>Food security - not earmarking development on productive agricultural land.</p> <p>Regulatory Impacts - recognition of impact of other regulatory changes, for example slurry storage.</p> <p>Sustainable Development - planning policy should not prohibit development in the countryside, in line with the Taylor Review of Rural Economy and Affordable Housing.</p> <p>Farm Diversification - Government policy is clear in PPS7 that farm diversification is an important part of the rural economy.</p>	Agriculture needs to be recognised within the Swindon Core Strategy and the importance it plays for the economy and the management of the environment.
34		1	CP1		Support Policy CP1, in particular to timely investment in infrastructure and using exemplar standards in sustainable design and construction.	
34		2	CP2A		Support Policy CP2A	
34		3	CP11		We support part D of this policy, that sites should not be located in areas at risk of flooding.	
34		4	SSP6		It is important that any new masterplan and planning permission should be in line with the flood risk management and SUDs requirements of this Core Strategy.	Additional text to highlight this point would strengthen this policy.

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34		5	SSP8		Support policy SSP8.	
34		6	SSP9		<p>Tadpole Farm contains an area of flood risk. Following the requirements of PPS25 the sequential and exceptions test should be applied before this site can be allocated. It is not clear in the Small Scale Urban Extensions Study whether the flood risk sequential test was applied.</p> <p>Furthermore, if the intention is that built development will not be located within the flood plain that needs to be explicit in the policy</p>	<p>Suggest that the matter could be addressed by an extra point stating:</p> <p>"Proposal for development at Tadpole Farm must protect the undeveloped River Cole (This should be Ray) floodplain, by steering all built development out of this area"</p>
34		7	SSP10		The supporting text to the policy could be strengthened by referring to the function of the River Ray Corridor as a flood plain. Development will only be acceptable in the floodplain if there are no suitable alternative sites for providing housing, and it will be important for Wiltshire Council to discuss the sequential test with our Planning Liaison Team in SW England.	
34		8	DMP1		Support the inclusion of a requirement for SUDs. The text refers to "Environment Agency" standards, however our requirements are mainly driven by requirements from other sources. Thus we recommend a change in the text.	Suggest a change to the text "should be in line with the requirements of PPS25, and where possible following the CIRIA guidance"
34		9	DMP8		Support policy DMP8.	
34		10	DMP1B		Support this policy due to the need for water efficiency in new development, to manage use of water resources	
34		11	DMP1A		We support this policy	

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34		12	CP10A		<p>The policy text is not flexible enough as it does not respond to the possibility that the canal proposal needs further assessment before we can be sure it is deliverable. Particularly, the availability of water resources to fill the canal without damaging the environment by over abstraction and the potential impact on water quality where the canal water re-enters the natural river system.</p> <p>We would like it to be rephrased as a 'potential restoration' this would make the document more flexible.</p> <p>THIS OBJECTION WAS SUBSEQUENTLY WITHDRAWN FROM THE ENVIRONMENT AGENCY. THEY HAVE WITHDRAWN THEIR OBJECTION ON THE BASIS THAT, ON BALANCE THE SUPPORTING TEXT DOES ACKNOWLEDGE THE NEED FOR FURTHER ASSESSMENT OF THE CANAL</p>	
34		13	CP10A		Support the recreational benefits that the canal could offer and the approach of safeguarding the route.	
38		1	Introduction		Makes the comment there are (only) 3 ecologically important rivers (presumably the Thames, Cole and Ray) when there are others too.	Perhaps this should be '3 ecologically important rivers and their tributaries'.
38		2	Spatial Vision		'protected our natural environment as much as possible' is indeed what the Com Strategy says. This was missed, as it should talk about enhancement too.	

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38	3		Spatial Vision		The monitoring indicators may not be closely related to the efficacy of the Core Strategy, for example, many are principally delivered through mechanisms other than spatial planning.	
38	4		Spatial Vision		The indicators will not measure whether the objective has been met. For example, the economy objective relates to enhancing Swindon's position as the UK's best business location, yet none of the indicators will answer the question as to whether this has happened. Question whether the plan is sound based upon the appropriateness of the monitoring indicators.	
38	5		SO1		Sustainable Development means something more wider than the text under this heading. It would appear that the main element of this policy is around climate change, mitigation and adaptation and thus the title of this SO should be changed to reflect this. We question whether the plan is sound on the basis of the appropriateness of this title.	
38	6		SO10		We would like to see more indicators added to the Green Infrastructure Strategic Objective. It is also not clear where the methodology for the local indicator around 'quantity and proportion of strategic green corridors developed'	Suggested indicators: 1. Proportion of the population living in areas meeting ANGSt or similar local target 2. Amount of biodiversity gain delivered through the planning process.
38	7	2	CP1		Para 2.1 makes reference to environmental enhancement, however there is no reference to this in CP1.	Suggest adding the following: v. Contribute to delivering green infrastructure W would also suggest that the following wording be added to point C '...', enhancing the local environment.'

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38	8		CP2		Infrastructure and services should be there to meet the needs of the community	Suggest redrafting point one of the policy to read: I. Infrastructure and services are provided to meet the needs of the community
38	9	2.9/2.10	CP2		It is not explicit whether green infrastructure is 'essential infrastructure' or not essential. We consider that GI is essential and this is supported by a raft of evidence (re the SW RSS).	If it is accepted that GI is essential, GI should be mentioned in para 2.9, 2.10 and changed to include CP10.
38	10		CP2A		Suggest some additional working to Policy CP2A.	At point C "Development will minimise the risk of flooding and maximise the inclusion of floodplain areas within Green Infrastructure strategies, making appropriate use of Sustainable Urban Drainage Systems (SUDS)"
38	11		CP4		Concerned that 10,200 dwellings can be built within Swindon without conflicting with the RSS requirement that developments should enhance green infrastructure. Many of the small greenfield urban sites are likely to provide, at the very least, visually accessible green infrastructure, which is likely to be degraded by development on them.	

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38	12		CP7		Concerned by the inclusion of the Purton Road - Great Western Way link road in this policy. Such a road may conflict with current green infrastructure function of the land it crosses and foreclose opportunities to enhance this function and cut across a Strategic Nature Area. Concerned that the impacts of such road have not been considered thus will prejudice any debate over the need for this road vs. the need to maintain and enhance green infrastructure prior to evidence being presented.	
38	13		CP7		With regards to the Purton Road - Great Western Way link, it is not clear what is meant by a "sustainable transport link". Policy is in potential conflict with other policies in the plan.	
38	14		SO1 & CP7		Welcome SO1: Sustainable Development and the aspiration of CP7 to deliver a comprehensive sustainable strategic and local transport network recognising that both are vital if Swindon is to have a vibrant economic and social future.	

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38	15	Trans. Strategy		<p>Impact on CO2 emissions and pollution</p> <p>Under the transport strategy, Swindon will see an increase in CO2 emissions from transport over and above the increase in population, i.e. a per capital increase.</p> <ul style="list-style-type: none"> - Will jeopardise Swindon's ability to meet existing legal requirements for CO2 emission reductions (NI 186, Climate Change Bill - 26% reduction by 2020) - Inconsistent with emerging national policy regarding CO2 emissions reductions from road-based transport sector. - Emerging national policy to reduce CO2 emissions from domestic transport likely to withstand any change in government - 'Quality of Life Report - Blueprint for a Green Economy' states 'Central Government guidance and targets should place at least equal emphasis upon reducing CO2 emissions as upon alleviating congestion. We propose that as a condition of funding, LTPs should be required to demonstrate clear, achievable reductions in the carbon intensity of local transport.' - Projected increases in CO2 emissions under STS undermine the credibility of SO1 of the CS 'to become an exemplar community, having exceeded national and international target for CO2 emissions reductions.' - Strongly support need for sustainable transport strategy and modal shift, however from CO2 reduction basis, STS not sustainable. Cannot justify £370M that increases per capital emissions of CO2 that marginally mitigate these increases compared with 'do minimum' scenario. Believe this considerable sum could be targeted more effectively as further suggested. - Para 6.4 - Absence of information on 	<ul style="list-style-type: none"> - Give more attention to low-tech options. Eddington Transport Study (DfT, 2006). The Governments' Travel Demonstration Towns (Peterborough, Darlington and Worcester) show how using low-tech measures to deliver behavioural change, such as workplace travel plans, car sharing, teleworking, and individualized travel plan, they have delivered double-digit reductions in traffic and corresponding increases in cycling, walking and buses-use in 2 years for relatively low budgets (approx £3M). We recognize that some similar types of interventions are included in the STS and we support these. However do not go far enough - emphasis on 'awareness raising' activities - but real investment in concrete enabling and incentivising elements to accompany the awareness raising elements, appears to be lacking. We welcome the Bus Rapid transport links, rather than new roads. Significant investment in the BRT does not seem to yield commensurate 'sustainability' benefits, and our view is that it should be balanced with low-tech options that have been shown to be very effective in promoting behavioural change. A comprehensive suite of low-tech options also provides more flexibility than the high-tech, large infrastructure options, enabling changes in available funding to be accommodated. - Reduce interventions designed to increase road carrying capacity for private motorized vehicles. To improve network efficiency and traffic flow through junctions for private motorized transport, UTMC (para 2.98 of CS) can increase overall traffic volumes and emissions, while creating only short-lived alleviation of congestion. UTMC only becomes an

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					<p>how a cumulative assessment was made, makes it impossible to assess whether the balance between investment in proposed sustainable vs. non-sustainable interventions is appropriate.</p>	<p>effective tool for modal shift when it is introduced with 'demand management interventions in the Swindon Core and Transport strategies is a factor contributing to their poor sustainability (emissions) performance. Road-building and sidening interventions will increase road-carrying capacity for private motorized vehicles will undermine efforts to promote behavioural change and modal shift, by continuing a 'predict and provide approach' and by diverting funding from sustainable transport infrastructure.</p> <p>- Include a 'demand management' toolkit. Section 5.2.41 of the STS is focused solely on promoting sustainable transport, with no demand management - there are no interventions designed to disincentivise use of the private motor vehicle, such as road-pricing, workplace parking levies, and filtered permeability. This absence of disincentives is likely to be a major reason why the transport strategy fails to deliver significant sustainability benefits.</p>
38		16		CP9	<p>CP9 makes no reference to the public health impacts of new developments. The CS has a major influence over public health, and the draft RSS (policy HE2) states "LDDs should embrace preventative measures to address the causes of ill health and reflect the role spatial planning can play in shaping healthy communities. Health Impact Assessment should be an integral part of the decision making process on all major development proposals".</p>	<p>We feel the document should make reference to the role green infrastructure can play in improving public health.</p>

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38	17	2.134	CP9		We feel that it would be appropriate to recognise the role Green infrastructure has in reducing crime levels, given the body of evidence supporting this position.	
38	18		CP10		We support this policy.	
38	19		CP10A		There may be economic, biodiversity and water resource constraints which may mean that canal restoration in this instance is not desirable. The current policy wording appears to judge that the canal restoration is desirable, without providing enough supporting evidence to demonstrate this as fact. We also note that CP10A Implementation and Monitoring Plan table on P30, Project Canal, contains no reference to an EIA/Environmental feasibility study.	We believe that if the policy was amended to read"... will be safeguarded so that options for their future restoration and re-establishment as navigable waterways are not jeopardised", then this presumption in favour of restoration would not be made (and associated evidence would not be needed).
38	20		SSP7		There are two critical and related issues that are facing the land at Commonhead Firstly that the proposed urban extension does not have a negative impact on the Coate Water SSSI, and secondly that the land east and south of Coate Water which is not to be built upon is utilised to its full potential.	

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38		21	SSP7		<p>The draft RSS identifies the area between the allocated land Coate Water and the M4 as a Strategic Nature Area as in policy ENV4. We believe that this land presents one of the biggest opportunities in the Core Strategy to comply with draft RSS policy ENV4, significantly contribute to delivering the Core Strategy's policies S)10 and CP10, and help address the recurring issue identified in the community strategy of poor image of Swindon. By doing so it will also meet the requirements to protect and enhance the SSSI (as required under PPS9) and allow the Council to meet its statutory duty to further and enhance the SSSI. We are unclear why the Commonhead preferred option to "expand Coate Water Country Park to incorporate the land between the new development and the existing Country Park providing a functional and robust buffer between the development and existing biodiversity assets" was dropped, as this is a closer approximation to what we suggest should be included.</p>	<p>Green infrastructure on the site could include the creation of a "Swindon Wetland Centre", making it a flagship attraction on the edge of the town, and attracting visitors from the M4. The policy does state that development proposals must "create a robust and functional buffer between Coate Water Country Park and new development". This does not require the enhancement of the SSSI which we believe should be a minimum requirement. We would therefore like the policy to be amended to say "Create a robust and functional buffer between Coate Water Country Park and new development which enhances the SSSI and creates additional green infrastructure". We would also like supporting text to set out what a "robust and functional buffer" actually means. We would like this to state that this means that this buffer will be most of the land between the allocated land, Coate Water and the M4 as far as Burderop Wood to be managed as green infrastructure.</p>
38		22	SSP9		<p>We are concerned that under point x), that the Cricklade Country Way Corridor has not been identified as a critical infrastructure project in the "Implementation and Monitoring Plan", and as such we thus question whether this policy is deliverable.</p>	

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38		23	SSP10		It is not clear why vii) has been included given policy ii) has been included. Moreover, it is not clear what ii) means in terms of "sustainable travel solutions for all modes of transport" (as for example some modes are not employed e.g. boat, while others are inherently less sustainable than others). Surely this would be clearer if it "provides sustainable links to the existing Swindon...".	
38		24	SSP10		Under policy point vi), development should enhance, not merely fail to jeopardise these green infrastructure links, and the policy wording should reflect this. Moreover, it is likely that this development will fall near or upon one of the Strategic Nature Areas referred to earlier in the draft RSS policy ENV4. As such the policy should included reference to enhancing the Mouldon Hill Strategic Nature Area, with para 3.77 expanding on this point.	We therefore suggest rewording to state "vi) enhance the function and character of the green infrastructure links including the River Ray wildlife corridor, the Cricklade Country Way and Mouldon Hill Strategic Nature Area".
38		25	SSP11		We are not clear why under D, some generic infrastructure requirements are stated (e.g. education) and others not stated (e.g. green infrastructure). We feel that this gives two tiers of infrastructure requirements; a top priority tier stated under D, and a lower priority tier given in the DMPs. There is a strong evidence that Green Infrastructure should be included as essential infrastructure on a par with, for example, education.	

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38		26	DMP8		A critical aspect in terms of delivery of green infrastructure is the need for a mechanism for delivering site specific green infrastructure measures on land outside of the development boundary (e.g.. Creating a new footpath link), over which the developer has no control. It is unclear from the Core Strategy how this issue will be addressed, and this throws into question the deliverability of the policy. Without such a mechanism, new developments will fail to be integrated into their surrounding area. This is even more pressing given the proximity of development into neighbouring LPAs.	
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38		27	DMP8		We are concerned that there are two aspects of green infrastructure which may slip through the policy framework. The first is that of visual access. While an area of land may not have public access, it may still serve valuable Green Infrastructure (GI) function by being viewed. We feel the supporting text should explicitly acknowledge this, possibly under landscape. The second aspect is that the policy describes the need for GI, and not explicitly the function the GI delivers. For example, it may be feasible to retain a greenfield public right of way within a development, but by enclosing it, it may for a variety of reasons be used less (by pre-development residents of the area) less due to the development. This should be regarded as a loss of GI function. The supporting text should (e.g. in para 4.79) emphasise the function of GI.	
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38		28	DMP8		The policy requires development to meet open space standards as set out in appendix 3. We very strongly feel that these standards should incorporate Natural England's greenspace standards (which are set out in the Green Infrastructure Strategy p.49). An exception may be appropriate for the provision of a 500ha site. I attach Natural England's evidence base supporting the inclusion of this standard.	
38		29		App 3		p.148: It would be helpful if the table also stated that allotment provision was under review. It would also be helpful if the 1ha minimum size for local open spaces state in the Green Infrastructure Strategy (p.48) was repeated here.
38		30		App 3		We would endorse a move from provision being based on a ward by ward basis, to that of a distance threshold, now mapping technology permits.
38		31		App 3		p.149: It is not clear how the accessibility standards have been derived. For example, in the open space audit, data (6.13.1) describes the current situation in Swindon, rather than the evidence need.

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43	1	CP7, SSP8		<p>A420 Transport Infrastructure. The Submission Core Strategy is not effective because details of how the new transport infrastructure, which will be needed to link new communities such as the Eastern Development Area with the existing transport network of the A420, will be delivered are not included in the document. Details of any improvements required to maintain or improve capacity of the A420 are not included.</p> <p>This information should have been included in the Submission document for the following reasons:</p> <ol style="list-style-type: none"> 1. The Draft RSS incorporating the Secretary of State's Proposed Changes (July 2008) includes 'Development Policy D' which indicates that the planning of development should provide for the delivery of new or improved transport infrastructure in step with development. 2. Policy CP7 sub clause ix) refers to 'significant strategic transport network improvements' and points to the necessary transport infrastructure to link new communities with 'the existing transport network'. 3. Policy SSP8 xiv) requires provision of 'transport infrastructure to minimise the impact of development upon the existing transport network' but the specified examples do not include any reference to the A420 (even though a key infrastructure requirement for the EDA is "A420 access" - see 'Implementation & Monitoring Plan' section 5 sub-section 4). 4. The fact that this infrastructure is identified in the companion document (Implementation & Monitoring Plan) but not in the main document would seem to suggest that the deliverability of this infrastructure is uncertain. 	To make the Core Strategy sound, the text should be modified to detail the necessary transport infrastructure needed to link new communities with existing transport network and any improvements required to maintain or improve capacity of the A420.

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43	2	3.64	SSP8		<p>The Core Strategy is not effective because it does not include details clarifying how the strategic buffer within the eastern boundary of the EDA will be delivered. These details should have been included for the following reasons:</p> <ol style="list-style-type: none"> 1. Para 3.64 refers to settlements in proximity to EDA retaining their character and minimising impact of EDA. It states that the extent of the EDA has been carefully drawn to address this to retain a strategic 'buffer' between it and surrounding villages. Fig. 16 shows this has not been carefully drawn to retain a strategic buffer as it does not show a strategic buffer. 2. This inconsistency within the document means it is unclear how this environmentally important strategic buffer will be delivered. 	To make the Core Strategy sound with regard to these points, an appropriate strategic buffer within the boundary of the EDA should be included and relevant changes made to text and Figure 16.

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43	3	3.64	SSP8		<p>Re Strategic buffer to east of EDA. Submission Core Strategy not justified because omission of an environmentally important strategic buffer within the eastern boundary of the EDA means the Core Strategy is not the most appropriate strategy and this will result in a failure to ensure that related environmental objectives will be achieved. Following reasons apply:</p> <ol style="list-style-type: none"> 1. Vale of White Horse DC has made previous submissions to SBC relating to the importance of a strategic buffer within the eastern boundary of the EDA to protect nearby local communities such as Bourton and the local environment. (See this Council's responses to Core Strategy Preferred Options and EDA SPD (June 2009). 2. Para 3.64 refers to settlements in proximity to EDA retaining their character and minimising impact of EDA. It states that the extent of the EDA has been carefully drawn to address this to retain a strategic 'buffer' between it and surrounding villages. Fig. 16 shows this has not been carefully drawn to retain a strategic buffer as it does not show a strategic buffer. 3. The submission document accepts the case for a strategic buffer, which the Council supports, but the omission of the strategic buffer east of the EDA means that the document does not include the most appropriate strategy. Moreover, this inconsistency must also affect its soundness. 	To make the Core Strategy sound with regard to these points, an appropriate strategic buffer within the boundary of the EDA should be included and relevant changes made to text and Figure 16.

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43	4	CP7, SSP8		<p>A420 Transport Infrastructure. The Submission Core Strategy is not justified because details of how the new transport infrastructure, which will be needed to link new communities such as the Eastern Development Area with the existing transport network of the A420, will be delivered are not included in the document. Therefore, not possible to comment on the evidence base that should support the provision of this necessary transport infrastructure.</p> <p>This information should have been included in the Submission document for the following reasons:</p> <ol style="list-style-type: none"> 1. The Draft RSS incorporating the Secretary of State's Proposed Changes (July 2008) includes 'Development Policy D' which indicates that the planning of development should provide for the delivery of new or improved transport infrastructure in step with development. 2. Policy CP7 sub clause ix) refers to 'significant strategic transport network improvements' and points to the necessary transport infrastructure to link new communities with 'the existing transport network'. 3. Policy SSP8 xiv) requires provision of 'transport infrastructure to minimise the impact of development upon the existing transport network' but the specified examples do not include any reference to the A420 (even though a key infrastructure requirement for the EDA is "A420 access" - see 'Implementation & Monitoring Plan' section 5 sub-section 4). 	To make the Core Strategy sound, the text should refer to the evidence on which the transport infrastructure needed to link the EDA new community with the existing A420 transport network is based.

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43		5	CP7,SSP8		<p>The submission Core Strategy is not effective because its transport provisions are not deliverable as they are not consistent with the adjoining South East Plan for the following reasons:</p> <p>1. The published South East Plan (SEP) identifies the A420 (Oxford to Swindon) as a regional spoke Policy T8. SEP Policy T8 also requires relevant regional strategies and LDDs to include policies and proposals that support and develop the role of regional spokes. The Core Strategy does not appear to include any policies or proposals that explicitly support and develop the role of this (SEP) regional spoke.</p> <p>The Core Strategy therefore not consistent with other relevant plans relating to adjoining areas.</p>	To make the submission Core Strategy sound with regard to this point, the text should be modified to explain what the implications will be for the A420 if, within Swindon Borough, it becomes a regional spoke.
44		1	SSP9		<p>The proposed Tadpole Farm development will result in over 2500 new homes being built. There is inadequate infrastructure in place to support such development. The sewerage system is currently inadequate and would need to be upgraded to cope with increased demand. A new pumping station and treatment works would need to be considered.</p>	
44		2	SSP9		<p>Parts of Tadpole Farm form part of the River Ray Flood plain and are unsuitable for development.</p>	

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44		3	SSP9		The existing road infrastructure is inadequate to cope with the proposed development at Tadpole Farm. Before development is permitted the Purton/Iffley Road link should be completed. Tadpole Lane is inadequate to cope with increased traffic and would need to be upgraded and the junction by Crosslanes Farm would need to be re-designed.	
44		4	SSP9		The existing schools and shopping facilities would not support the additional development at Tadpole Farm. Additional provision would also need to be made for public recreation and cultural facilities, in particular a swimming pool.	
44		5	SSP9		There is no provision for allotments at the proposed development at Tadpole Farm.	
44		6	SSP9		The Swindon and Cricklade Railway line could be developed further to provide a transport link to town and a corridor for the link to the Swindon/Gloucester line should be protected.	
44		7	SSP10		It was suggested that a site be allocated for a park and ride service in the Moredon Bridge area.	
44		8	SSP9		Additional facilities for waste disposal and recycling would need to be considered.	
44		9	SSP10		The proposed Tadpole Farm & Ridgeway Farm/Moredon Bridge development will result in over 2500 new homes being built. There is inadequate infrastructure in place to support such development. The sewerage system is currently inadequate and would need to be upgraded to cope with increased demand. A new pumping station and treatment works would need to be considered.	

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44		10	SSP9 & SSP10		Parts of Tadpole Farm & Moredon Bridge form part of the River Ray Flood plain and are unsuitable for development.	
48		1	SO2		There is no evidence that the Council has undertaken any outline, let alone detailed, costing of the infrastructure requirements associated with the strategy. This is despite a bold statement (as detailed in SO2) to the effect that somehow by 2026 these needs will have been provided in a timely and coordinated manner and adequately funded. In the absence of detailed costing and identification of funding sources it is not possible for the Council to claim that the strategy is 'deliverable'	The Council needs to undertake detailed costing of the infrastructure requirements associated with the strategy
50		1	CP3		There is no mention of park and ride services. Following the closure of the Copse service at Groundwell is 'soundness' being ignored in favour of economic and political influence.	
50		2	DMP1B		It is questioned whether the generation of energy from waste incineration has been given sufficient consideration.	
50		3	SSP9		There is no mention of any flood risk from the River Ray at Tadpole Farm	
50		4	SSP9		The Parish Council is opposed to any proposals at Tadpole Farm on the basis that it would have a negative impact on the already congested roads through Redhouse and Oakhurst.	
50		5	SSP8		Is the EDA a result of a proven need or just to meet a Government target? Has sufficient weight been given to the massive investment required in infrastructure before any development takes place?	

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50	6		SSP11		Insufficient evidence is given to the lack of access to the site and the need for a road as well as a foot/cycle bridge over the A419.	
50	7		CP9		This does not tackle the poor quality / quantity of sports provision and community meeting places such as community halls/churches/local centres. Incompliant with PPS1 and DMP2.	
50	8		DMP1A		What has been concluded from the SFRA regarding the location of new developments?	
50	9		CP3		The reference to 'efficient local, national and international transport links' indicates that park and ride services are needed in a modern, vibrant town. Closing down the Copse site is contrary to this policy.	
50	10		CP4		Care is needed to ensure that rural communities are protected and not swallowed up by urban extensions	
50	11		CP5		The statement that 'centres first' is embedded in planning policy guidance is questioned as this is not apparent in the approach to the development of the NDA.	
50	12		SSP9		It is premature to consider the development of Tadpole Farm when the NDA is not a sustainable community.	
50	13		SSP12		The phrase 'related to proven local needs' should exclude the inclusion of rural settlements in achieving target figures for property numbers.	

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50		14	SSP2		There is no specific mention of the management of the development of the NDA. There is no concentration on the community infrastructure required in the NDA. There does not appear to be a 'sound' strategy but a piecemeal approach which would not be sustainable.	
50		15	CP4		With regards to housing density, the statements in these paragraphs could be contradictory.	
50		16	SA		Page 50. Was the selection of Option 2 influenced by a perception that existing infrastructure could be made use of? This option would still require major investment in an already stretched infrastructure.	
51		1	SSP12		<p>This document fails to resolve the tensions between economic development and environmental damages as it only makes reference to the Vision for Wroughton document.</p> <p>Thus the issues identified as part of the SWOT analysis remain unresolved and can make no legitimate contribution to the evidence for Policy SSP12.</p> <p>It fails to take into account the existing and developing policy of the Parish Council (specifically the Parish Policy Document, Jan 2009 and the Wroughton Strategic Community Action Plan, Aug 2009). Thus the Council has ignored the Government White Paper 'Communities in Control' guidance and is not legally compliant</p>	<p>Recognition must be given to the development of parish policy over the last 10 years. Delete the final paragraph of 3.88 and substitute 'This document must be seen in the context of the Parish Council policy document which attempts to resolve the tensions between economic and housing development and environmental damage in favour of the latter and the Wroughton Strategic Community Action Plan which sets out a list of projects and the evidence base for them in terms of local and national policy'.</p>

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51		2	SSP7		The plan is contrary to PPS1 due to the fact that there will be potential damage to ecology, an important literary landscape, significant archaeological features, strategic views from the AONB, Coate Water Country Park and the Local Nature Reserve at Day House Lane. Thus, proposed development will have a significant impact on these features.	
51		3	SSP7		There is no mention of preventing pollution from the landfill area proposed from the development .	
51		4	SSP7		Richard Jefferies is not even mentioned in the policy.	
51		5	SSP7		The proposal is inconsistent with the Council's commitment to protect this area from inappropriate development once the GWH was built. Furthermore, the land is more important to Swindon's future development as a rural recreational area and there is plenty land elsewhere for housing and employment development.	
51		6	SSP7		The strategy makes no reference to the increased impact of new development on mental health provision.	
51		7	SSP7		The plan states that it supports sustainable growth and yet continues to make commuting to work increasingly difficult. The current public transport infrastructure is not sufficiently developed.	
51		8	SSP7		There is a need for increased social housing. Swindon has a high incidence of homelessness.	
51		9	SSP7		The development area includes fields of significant archaeological importance and a local nature reserve at Day House Copse.	

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51		10	SSP7		There is no policy that would secure the protection of the proposed buffer around Coate Water. This land needs to be designated as high landscape by virtue of its historic, literary and amenity value.	Policy SSP7 should be deleted on the basis that there is no confidence that views will be 'respected' from Coate Water and the AONB.
51		11	SSP7		There is no point going through two previous consultation exercises and then ignoring the majority view with regard to developing the Coate area. The Council have ignored the advice in the Government White Paper 'Communities in Control: Real Power'.	
51		11	SSP7		Point x) of the policy Archaeological features will be protected when surrounded by modern estates	
51		12	SSP7		Coate should be removed from the main urban area of Swindon. More land should be set aside for the hospital to expand and accommodate the growing health needs of the town.	Deletion of the policy in paragraph 3.88 of Policy SSP12 (unsure whether this is the correct reference)
51		12	SSP7		Point viii) of the Policy that a functional and robust buffer between Coate Water and the new development will be created.	
51		13	App10		Query the accuracy of the population figures detailed in Appendix 10. Consider that the figure is nearer to 9000.	
51		14	App10		Why are public houses and other facilities described as numerous? This is not an accurate statement.	
56		1	SSP10		Swindon does not have the right to dictate future development in North Wiltshire and therefore the proposals for Ridgeway Farm/Moredon Bridge should be removed from the core strategy.	Remove the proposals for Ridgeway Farm/Moredon Bridge.

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56	2		SSP10		Proposals for the West of Swindon should be jointly developed by NWDC and SBC to ensure a holistic approach and the people in North Wiltshire should be fully involved in the process. Such a review should include a full assessment of transport needs, infrastructure, services and flooding for the whole area. It should be holistic.	A joint review between both Local Authorities covering transport needs, infrastructure, services and flooding for the whole area
56	3		SSP10		Additional housing to the west of Swindon should not encroach on the communities of Purton, Lydiard Millicent or smaller settlements in North Wiltshire. Existing rural buffers should be maintained and protected. In considering where additional houses should be located, we ask that the West of Swindon review should consider the possible alternatives other than just the urban extension recommended by the Eip panel in order to mitigate any negative impact such a development might have on the communities of North Wiltshire.	The West of Swindon review should consider the possible alternatives other than just the urban extension recommended by the Eip panel in order to mitigate any negative impact such a development might have on the communities of North Wiltshire.
60	1		CP4		Point A - We support the Council's 30% target of new development to take place on previously developed land. This is a realistic figure.	
60	2		CP4		Point B - Density targets should be dictated by design, not restricted to 50 dwelling per hectare. We believe higher densities of new housing can be achieved without having to expand onto additional greenfield land.	Densities should not be restricted to a maximum of 50 dwelling per hectare.
60	3		CP4		Point C - We support the council in attempting to produce low density family housing; however as well as the higher end of the market, there is a need for this type of dwelling in the social rented sector	

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60		4	CP4		Point D - A viability assessment is required in accordance with PP3 para 29 in order to assess the economic viability of the proposed 35% proportion threshold in affordable housing. Without empirical data evidence base, it must be concluded that no viability assessment has taken place and the policy cannot be considered sound without one.	Undertake a viability assessment to back up the proposed 35% target in affordable housing.
60		5	CP4		Point D - We would have liked the Council to explore alternative ways to achieve the 35% target in affordable housing (set out in Policy H1 of the RSS). Significant proportions of Swindon's housing allocation will be on greenfield urban extensions which can deliver higher proportions of affordable housing. Individual site viability alone is not sufficient to ensure the policy is considered sound as PPS3 states.	It would have been more realistic to set a target of 30% within the town and a higher proportion for greenfield urban extensions. We also consider the Council could do more to encourage affordable housing in its other policies because these could help improve the supply of affordable housing above 35% on individual sites.
60		6	CP4		Point E - The Core Strategy does not make adequate provision for the growing elderly population in the Borough. To simply state that all new homes will be to Lifetime Homes Standard will not be sufficient to deal with the variety of care needs of the elderly population.	We recommend the Core Strategy makes clear that they will support a wide range of housing for the elderly. This could be nursing homes, sheltered housing or Continuing Care Retirement Communities.
60		7	CP4		Paragraphs 2.42 + 2.49 The Government has already clarified that bringing empty homes back into use will not contribute to Local Planning Authorities housing target as they are existing homes.	It is not strictly a planning issue and we question whether it is necessary to make reference to it.
60		8	CP4		We welcome the Council's approach to negotiating over the mix of affordable housing stock in order to maintain the 35% affordable housing requirement.	

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60		9	CP4		<p>Paragraph 2.55</p> <p>It is overly restrictive to state that no more than 15 affordable units shall be grouped together, particularly with high density schemes. This paragraph suggests that all developments must reflect the latest Housing Market Assessment, but PPS3 (paragraph 24) advises Local Authorities should only insist on a certain housing mix on large allocated sites.</p>	<p>Amend the first sentence of 2.55.</p> <p>Change the last sentence to:</p> <p>"On large strategic sites, the mix and sizes of the house types must reflect Swindon Borough Council's latest housing needs information at the time drawing on the most up-to-date Housing Needs Survey and the Housing Register. On all other sites, the mix of housing should contribute to the creation of mixed and balanced communities."</p>
60		10	CP4		<p>Paragraph 2.56</p> <p>We support the Council in seeking lower affordable housing thresholds in rural areas, however this must be supported by a creditable evidence base, as the Core Strategy states.</p>	<p>We would highly recommend this is done through a review of the Core Strategy rather than an SPD. Such a policy revision should be subject to Inspector scrutiny at an Examination in Public. Using an SPD would reduce the weight the policy would be given at appeal.</p>
60		11	CP4		<p>More could have been done to encourage rural exception sites in the district. Promoting this issue from supporting text to policy would indicate to RSLs that the Borough welcomes these schemes and would give them more certainty about bringing them forward.</p>	<p>We recommend that a separate Rural Exceptions Policy is inserted into the Core Strategy which sets out the criteria for allowing Rural Exceptions Schemes.</p>
60		12	DMP2		<p>We have no objection to the list of contributions with the exception of Waste.</p>	<p>We consider that Waste contributions should be covered by additional Council Tax payments from the population increase.</p>
60		13	DMP2		<p>The Council should set out that providing affordable housing is its main priority amongst the contributions. Setting this out would increase the level of affordable housing provision, as it would offer guidance to Development Control Officers when negotiating over reduced contributions on the grounds of viability.</p>	<p>The Council should set out that providing affordable housing is its main priority amongst the contributions.</p>

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60	14		DMP2		We commend the exemption of affordable housing from planning obligations in their Developer Contributions Development Control SPG. We urge the Borough Council to continue with this strategy when the SPG is reviewed/updated.	
60	15		DMP3		One way to increase the supply of affordable housing is to encourage the re-use of the least valuable employment land. This is encouraged by Policy ES3 on the re-use of employment areas.	Insert the following text following Point A (iv), Point B (v) and at the end of Point C: "or, unless the redevelopment of the employment area would bring about a greater set of community benefits"
60	16		DMP4A		We restate objections we made for Policy CP4.	Point A.i should be reconsidered to look at other ways of achieving the 35% target. Point A.iii needs to be rewritten so that the development should only reflect up-to-date Housing Market Assessment on large strategic or allocated sites.
65	1	2.73	SSP8		Concerned over the justification for the amount of floorspace proposed at the new EDA District Centre and the accuracy of the evidence informing retail policies in the Core Strategy. The policy requirements are inconsistent with the Retail Capacity Update evidence base.	
66	1		Spatial Vision for Swindon (Part 1)		We welcome the spatial vision to create an integrated and sustainable transport network. It should be re-emphasised that significant investment in public transport and cycle/pedestrian links will be necessary; and such funding will need to be significantly provided by developers. We therefore also support SBC's intention to update the Developer Contributions Guidance Note.	

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66		2	SO7		We support the provision of Strategic Objective 7.	We would like to see the monitoring indicators expanded to include "Journey time reliability and network resilience on the SRN" included within this statement.
66		3	CP1			We would like to see reference to the delivery of development sites that are accessible by a combination of travel modes and that minimise the requirement for use of the private motor car.
66		4	CP2		<p>We acknowledge that where a requirement for improvement arises as a result of development, that contributions will be sought for the works. We also acknowledge the economic viability of proposed developments will be a key issue in determining the level of development contributions and the extent to which public funds are required.</p> <p>We have been consulted on the upgrade of the Developer Contributions Guidance Note to SPD status and will expect to contribute towards the decision-making process associated with the introduction of a tariff based system.</p>	
66		5	CP3		We support the objective to focus additional floor space within the Swindon Central Area, which is supported by modes of transport other than the private car. Furthermore we agree that urban extensions within Swindon should include provision for sufficient employment opportunities to facilitate mixed-use developments thereby reducing the need to commute.	

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66	6		CP4		We strongly support the provision of higher density developments at transport and community focal points where the ability to access services by walking/cycling is maximised.	
66	7		CP5		We support the aim to direct most new shopping provision within the existing town centre, with limited shopping growth at district centres. We will need to be assured from the evidence presented that the level of provision is commensurate with the needs of the EDA and does not draw additional traffic from other parts of Swindon.	
66	8		CP7		We welcome references in paragraph 2.106 to ensuring that Swindon growth proposals do not compromise the strategic road network. We also acknowledge the reference to significant infrastructure works to Junction 15 and 16 of the M4.	
66	9		CP7			In Paragraph 2.106 Delete "and their access routes that will also assist in use by other modes of transport" This sentence cannot be substantiated.
66	10		CP7		Under the implementation section, we wish to see more precise wording in Paragraph 2.111 which defines the word "appropriate". This word is open to interpretation.	Replace the word "appropriate" in Paragraph 2.111.

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66		11	Introduction - Figure 2		We wish to see the A419 being acknowledged as a link of strategic importance connecting the M4 with the M5 at Gloucester.	We wish to see the A419 being acknowledged as a link of strategic importance connecting the M4 with the M5 at Gloucester.
66		12	Introduction - Challenge For Swindon		<p>We support this section but would wish to see more added.</p> <p>We also seek reassurance that the contributions which are expected to come forward from developers will be ring fenced appropriately for the Agency's SRN projects, where identified.</p>	<p>Add</p> <p>"Where the combined impact of a number of developments creates the need for infrastructure, it may be reasonable for the associated developers' contributions to be pooled, in order to allow the infrastructure to be secured in a fair and equitable way."</p>
66		13	SO1		We support the objective to reduce CO2 emissions.	
66		14	S02		We support this. However it must be provided within the context of firstly reducing the demand for travel from new development. It is imperative to us that journey time reliability and network resilience is not adversely affected and that any development leaves the SRN no worse off. In most instances, any infrastructure improvements to meet this requirement should be funded by the developer.	
66		15	S02		<p>The following statement is aspirational and there is no evidence that this can be provided</p> <p>"By 2026 the infrastructure needs for and arising from the growth of Swindon and from past under-investment will have been provided in a timely and co-ordinated manner, including having been adequately funded."</p>	<p>Rethink the following:</p> <p>"By 2026 the infrastructure needs for and arising from the growth of Swindon and from past under-investment will have been provided in a timely and co-ordinated manner, including having been adequately funded."</p>
66		16	SO4		We support this	

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66	17		SO4		We support this, providing that this does not create competing centres to the town centre and encourage new trip making.	
66	18		CP5		New EDA District Centre: We are concerned that an inappropriately sized foodstore might attract strategic external trips from other parts of Swindon. We will only support a foodstore of this size if there is a robust evidence base that identifies that the provision of such a facility is commensurate to the scale, function and character of the EDA.	We will only support a foodstore of this size if there is a robust evidence base that identifies that the provision of such a facility is commensurate to the scale, function and character of the EDA.
66	19		CP7		We support - The proposed Rapid Transit Route - The need to continuously review the frequency, timing and service off buses to new developments. - The provision of new/improved cycle and pedestrian links - The provision of an Urban Traffic Management and Control System in principle. We would expect to be consulted on the scope and detail of the Urban Traffic Management and Control System including compatibility with our own systems.	We would expect significant strategic transport network improvements to include public transport improvements. We wish to ensure urban expansion networks are connected to the existing pedestrian and cycle network in established parts of Swindon and they are designed according to DfT's Manual for Streets principles.
66	20		CP7		The case for the Park & Ride is not stated clearly. We would support this if there was the existing demand.	Further supporting text required to clarify Borough Council's intentions.

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66	21		SSP1		We support the Council's approach in para 3.13 - a requirement for limited additional housing/employment provision in rural areas, provided this is in locations with existing public transport links.	
66	22		SSP1		We seek clarification on what "Level 1 public transport provision" is.	Add a footnote to support this statement.
66	23		SSP2		We would wish to be involved in discussions with both Wiltshire Council and SBC on the transport implications of settlements located outside the administrative boundaries of SBC	
66	24		SSP3		Supported, so long as employment land provision in urban extensions will not place unacceptable impact on the safe and efficient operation of SRN.	
66	25		SSP5		The Agency considers the provision of sustainable transport links between the two communities (East Swindon & EDA) and the Green Bridge in [particular as being essential to encouraging the sustainable modes of transport .We would not support a provision of a layout within the EDA which would encourage junction-hopping on the A419 between East Swindon and the EDA.	
66	26		SSP7		Any required mitigation measures in relation to the safe and efficient operation of the SRN are funded by developers and are in place at specified thresholds.	
66	27		SSP7		We seek clarification on the status of the proposed Commonhead Park + Ride facility and how this would be embedded within the proposals for the wider area.	Additional supporting text to clarify this.

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66		28	SSP8		We support the provision of sustainable methods of transport, particularly the Bus Rapid Transit system.	We consider it imperative that the council provide the Rapid Transport System within the FIRST phase of the development.
66		29	SSP8		Criterion C (v) - Support we would however like to see this reworded	Reword Criterion C (v) to: "Must minimise the impact of development upon the Strategic Road Network to ensure that the performance standards on the A419 and M4 would not be compromised"
66		30	SSP8		We would like to be consulted regarding: - Criterion D (i) - Infrastructure Requirements SPD - Criterion D (iii) - The potential tariff system to levy contributions.	
66		31	SSP8		All proposals should reflect sustainable transport objectives contained within PPG13. Development proposals should be accompanied by the relevant assessment complying with GTA and the requirements of Circular 02/2007: Planning and the Strategic Road Network.	
66		32	SSP9		We support Criterion (I), (iii), (v) and (ix) which all contribute towards a step change away from using private cars to sustainable modes of transport.	
66		33	SSP10		We support SBC's approach in providing public transport links within the first phase of any new development. We are also encouraged by a requirement for contributions towards road infrastructure.	
66		34	DMP1		We support the objectives for streets and transport	

<i>Respondent Ref</i>	<i>Comment No.</i>	<i>Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
66		35	DMP2		We support this policy and wish to be consulted on the draft SPD on contributions.	
66		36	DMP3		We support the sequential approach to site selection as per Criterion B (v).	
66		37	DMP5		We support this policy, but would like to see reference made to the DfT's Guidance on Transport Assessments at Paragraph 4.54	Add a reference to the DfT's Guidance on Transport Assessments at Paragraph 4.54
80		1	General		<p>Core Strategy appears to be generally consistent with national policy, justified and effective. It has been prepared in accordance with the LDS and has clear regard for national policy.</p> <p>The Core Strategy is consistent with the RSS and would appear sufficiently flexible to accommodate moderate changes to the RSS should they occur.</p>	

<i>Respondent Ref</i>	<i>Comment No.</i>	<i>Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
80		2	General		<p>Introduction, Spatial Vision and Strategic Objectives</p> <p>A succinct spatial portrait of the Borough would help describe the key issues/challenges faced by the Borough and places within it. Several such issues are highlighted in the Core Strategy but a concise summary at the outset would set a clear basis for strategic objectives and spatial strategy.</p> <p>The Vision does not fully convey what Swindon becoming a regional centre means. A more detailed vision which describes more of the outcomes Swindon seeks is required.</p> <p>Some strategic objectives seem quite high level. They could benefit from referring to important locations for change and indicators could be closely aligned to how effectively the strategy is being delivered.</p>	<ol style="list-style-type: none"> 1. More succinct spatial portrait. 2. More detailed vision. 3. More detailed strategic objectives.
80		3	CP0		<p>Core Policies</p> <p>If changes in respect of rep no. 2 are made to set out how the strategy is expected to shape places, there will be less of a role for the Core Policies which seem to be more about regulating growth than providing positive direction.</p> <p>This section could be slimmed down to focus on the spatial framework. See proposed changes.</p>	<p>CP1 - Repeats SO1. Should explain how Swindon will come to be known as one of the most sustainable towns in the UK.</p>

<i>Respondent Ref</i>	<i>Comment No.</i>	<i>Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
80		4	SSP0		Spatial Strategy - Tadpole Farm (SSP9) and Commonhead (SSP7) would benefit from more justification over location (use benefits highlighted in Small Scale Urban extensions study or signpost SA etc)	See Respondents comments.
80		5	CP1		Climate Change - Policy format could be developed to promote place specific initiatives tailored to local opportunities. - Local standards appear to duplicate national ones, or require more exacting standards which don't seem to be locally justified. (such as BREEAM "excellent" for non residential). - With scale of growth proposed, appear to be some significant opportunities to engage developers to secure delivery of sustainable buildings and local decentralised energy production. - Core Strategy should be more informed by, and in turn inform, local strategies on climate change. The Core Strategy might reasonably propose exploring local initiatives or expect innovation where there is a sufficient scale and scope of development, such as the proposed urban extensions	

<i>Respondent Ref</i>	<i>Comment No. Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
80	6	Implementation		<p>Implementation and monitoring plan</p> <p>1. Responsibility for provision of infrastructure beyond 2011 should be clearly set out.</p> <p>2. We question the direct relevance of using educational attainment as an indicator. The provision of schools might be more straightforward in this particular case.</p> <p>3. Our main concern is that there are no targets for the indicators in the strategic objectives. This should be remedied.</p> <p>4. There are references to a future site allocations DPD. The range of issues, if taken forward in one documents, would seem a difficult, cumbersome and slow process to manage.</p>	
80	7	DMP0		<p>Development management policies</p> <p>DMP1 - Restates elements of PPS1 Climate change supplement.</p>	See respondent's comments.
80	8	CP2		<p>CP2 - Appears to be general set of principles about infrastructure. Role of Core Strategy is to set out where infrastructure is needed and how it will be delivered.</p>	
80	9	CP2A -		<p>On infrastructure delivery, the spatial strategy needs to describe the process, commitment of those involved and the date by which a decision should be reached.</p>	CP2A - Strategy needs to explain how this issue will be resolved.
80	10	CP3 and 4		<p>CP3 and 4 - Might apportion scales of development for employment and housing to locations within the Borough.</p>	

<i>Respondent Ref</i>	<i>Comment No.</i>	<i>Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
80		11	CP5		CP5 - Appears to repeat PPS6 and emerging PPS4. Reference to undefined "network of local centres" would seem to confuse when this approach should be applied.	
80		12	CP6 -		CP6 - Would add value if broad locations were set out. "Equivalent" of new schools capacity should be defined - expanded old ones or new ones?	
80		13	CP7		CP7 - Policy reads as wish list. Could set out proposed transport networks and highlight improvements.	
80		14	CP8		Appears to be general set of principles/objectives.	
80		15	CP9		CP9 - Policy could add more value by identifying the new neighbourhoods where new multi agency centres will be located and priority order for investment.	
80		16	CP10A		CP10A - Not clear how certain this proposal is and what blight might occur if not funded/delivered.	Strategy should set out how this will be progressed and when likely to be delivered.
80		17	SSP		Spatial strategy needs to describe clearly and succinctly how/when it will be delivered. Work on EDA is more advance than western sites. Estimates for when these will take place would be beneficial.	
80		18	SSP0		Details of delivery will also help achieve central area regeneration. There are references to refusing planning permission which undermine regeneration. Not clear what evidence or circumstances might justify such a decision.	
80		20	SSP0		Aspects around delivery need to be drawn out selectively from the implementation and monitoring plan.	

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80		21		Implementation	Greater reference to the Water Cycle Study and White Hart junction improvements	
80		22		SSP	Important infrastructure needed at the outset of the plan period should be clearly set out. This would seem all the more appropriate where detail has been agreed in one or more of the Council's own strategies for transport or education.	
80		23		DMP1A	DMP1A - Restates policy approach in PPS25.	
80		24		DMP1B	DMP1B - Not clear how considerations will be taken into account in planning decisions. (Developers should not be required to demonstrate overall need/justification)	
80		25		DMP2	DMP2 - Approach delegates infrastructure requirements to an SPD. Strategy is not clearly deliverable if, later in the planning process, provision of infrastructure has not been agreed and there is no reasonable prospect of delivery.	
80		26		DMP3	DMP3 - How will it be judged that a proposed B1 use should be refused if it adversely affects the regeneration of the central area.	
80		27		DMP4A	DMP4A - What new evidence justifies a higher rate of affordable housing than the 30% included in earlier stages.	
80		28		DMP4B	DMP4B - No evidence on which proposed 20% quota is based. Need to reflect emerging guidance on planning controls.	
80		29		DMP5	DMP5 - Emphasis on general approach, repeats national guidance and practice.	

<i>Respondent Ref</i>	<i>Comment No.</i>	<i>Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
80	30		DMP6		DMP6 - Restates PPGs 15 and 16	
80	31		DMP8		DMP7 (sic, should be 8) - Emphasis on general approach, repeats national guidance and practice	DMP7 (sic, should be 8) - Emphasis on general approach, repeats national guidance and practice
82	1	1.1-1.2	Spatial Vision		While the spatial vision is sound in what it says, to emphasise the consistency of the plan's policies, it should include reference to the EDA, given its large scale and consequent significance within the future spatial structure of the Borough. The EDA has emerged through a process of robust and careful assessment and scrutiny and forms a central part of the vision for the borough in the future in the same way as will a regenerated town centre which is included within the Spatial vision.	A major new community to the east of the town will provide a range of new opportunities to live and work in Swindon.

<i>Respondent Ref</i>	<i>Comment No.</i>	<i>Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
82		2	CP1		<p>Policy SO1 sets an aspiration of 'having exceeded national and international targets for CO2 emissions reduction' by 2026. The CS is required to be consistent with national and regional policy and should not imply that exceeding such targets will be a requirement in new development.</p> <p>Development Policy G of the Draft Revised Regional Spatial Strategy for the South West incorporating the Sec of State's Proposed Changes, GOSW, July 2008 states that: 'There will be situations where it could be appropriate for local planning authorities to anticipate higher levels of building sustainability in advance of those set out nationally, for identified development area or site-specific opportunities. When proposing any local requirements for sustainable buildings, local planning authorities must be able to demonstrate clearly the local circumstances that warrant and allow this and set them out in Development Plan Documents'.</p> <p>Para 3.7.8 of the Draft Revised Regional Spatial Strategy for the South West incorporating the Secretary of State's Proposed Changes, GOSW, July 2008 clarifies that the Code for Sustainable Homes (CSH) is a voluntary scheme which aims to achieve zero carbon residential development/ Code Level 6 by 2016 and non-residential development by 2019, with staged voluntary targets at interim timescales. This paragraph also states that: 'The basis for introducing more demanding standards at the local level should fulfil the tests set out in para 33 of the supplement to PPS1 including in</p>	By 2026 Swindon Borough will have become an exemplar sustainable community having met national targets for CO2 emissions reduction, delivered the anticipated growth in a way that enhances the quality of life for existing and future residents including addressing the impact of climate change,

<i>Respondent Ref Comment No. Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
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terms of feasibility and the potential impact on the viability and supply of housing. Any requirement should be specified in terms of meeting nationally defined sustainable building standards'. The tests of para 33 of the supplement to PPS1, including the potential impact on viability, have not been addressed. The CS also does not demonstrate clearly the local circumstances that warrant higher levels of building sustainability in advance of those set out nationally. On this basis the word 'exceeded' should be omitted from Strategic Objective SO1 and replaced with the word 'met'.

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82

3

CP1

Any reference to new development needing to be of a standard of sustainable design and construction should be subject to the important caveat of the viability of attaining such a standard. In circumstances where its attainment would render unviable or unfeasible a development proposal that is otherwise acceptable, such a standard should not be sought. Equally as is the nature of complex development the demands in relation to particular elements that might be construed as comprising part of an exemplar development need to be balanced in the context of equally significant aspirations in relation to sustainable relation to sustainable development - such as affordable housing, infrastructure provision etc. Otherwise that proposal may not proceed or not achieve wider and potentially more important objectives, including the delivery of the housing trajectory. Incorporation of this important caveat would equally address the concerns of the Sustainability Appraisal voiced in paras 9.2.4 in relation to the need to consider the financial implications of sustainable construction aspirations. The extent to which the policy is deliverable whilst ensuring that the strategy to deliver growth is secured, is not proven.

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82

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CP1

As well as being subject to the important caveat of the viability of attaining such standards, the intended standards should themselves be specified in terms of nationally defined sustainable building standards. It will not be appropriate for all development to reach exemplar standards which have not been defined and hence are open ended commitments. Standards at national level are advancing rapidly and, increasingly, are being reflected in enhancements in mandatory building standards including through building regulations. It is unreasonable to expect new developments to deliver higher standards that may well be set at very high levels over the life of the Core Strategy. The wording of the policy does not provide clear guidance for developments and cannot be supported by the evidence.

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82		5	CP2A		<p>The stated preference for sewerage treatment of the retention of the Rodbourne works reflects the present understanding emerging from the Swindon Water Cycle Study. As is indicated options including the provision of a new works within the EDA are currently being explored including through that Study. The policy should also acknowledge that achievement of the housing trajectory depends on the timely delivery of enhanced sewerage treatment infrastructure and to allow for any delivery of sewerage treatment capacity at the EDA should that prove necessary to secure the implementation of the housing trajectory. In this regards SEDAG has undertaken work through a study completed by Veolia Environmental that demonstrates the ability to deliver, in modular form, of STW capacity within the EDA should prove necessary.</p>	<p>To ensure that the policy is flexible and is the most appropriate alternative, Policy CP2A should be amended as follows: "Waste water requirements will be met by the expansion of the existing Rodbourne sewage treatment works (STW) and, if demonstrated to be the most sustainable or necessary option, an additional STW at the proposed EDA to be implemented in a timely fashion to ensure the delivery of the housing trajectory."</p>

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82		6	CP3		<p>Whilst Cp3 is generally appropriate, the wording is not the most appropriate alternative and the internal consistency of the plan could be enhanced.</p> <p>It is believed that overall, the Core Strategy does [identify the centres within their area where development will be focused] although it is not well expressed in CP3B.</p> <p>Having adopted a robust sequential approach to the identification of new employment including B1 opportunities, the SWS recommends that further employment development is focused on the EDA.</p> <p>The ability to make a strong place making contribution towards the EDA should also be emphasised.</p>	<p>For the reasons set out above, Policy CP3B should provide further guidance in relation to the location of office development by including a reference to the employment opportunities to be provided within the EDA as follows: Swindon Central Area will be the focus for office development requirements. Office development will also be appropriate within the District Centre of the EDA. Out-of-centre office development will be permitted only if it can be demonstrated it cannot be accommodated in the town centre, or that it will not have a detrimental impact on the provision or delivery of new town centre office accommodation or EDA.</p>
82		7	CP3E		<p>Section E of the policy seeks to direct residual employment requirement to the urban extensions. This is appropriate each having been identified as one of the most sustainable locations to accommodate growth and as an approach is sound.</p>	<p>Both the evidence base and the need for flexibility suggest that the policy should be amended as follows: Additional land to be identified to meet additional forecast need and to realise the potential of Swindon should be identified within proposed urban extensions to Swindon. This will require the allocation of a minimum of 35 hectares of employment land. Paragraph 2.37 should refer to "at least 55 hectares" rather than "around 55 hectares".</p>

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82	8		CP3E		Both the ELR and the SWS include a range of employment land requirements based on a range of assumptions. They offer different assumptions and demonstrate the sensitivity of the employment etc. In this regard the requirement for an additional 55 hectares of employment land should be regarded as the absolute minimum expectation.	
82	9	2.50	CP4D		<p>Policy CP4 includes an annual target of 35% for affordable housing. This is not supported by the evidence base and does not support the wider strategy of the Core Strategy. Nor is it clear that it is deliverable.</p> <p>It is suggested that the Swindon Housing Market Assessment Summary Report should be a primary consideration in justifying the appropriate affordable housing rate at the local level and that the CS should be amended to include a rate of 30% as recommended in the Swindon Housing Market Assessment Report.</p>	The first sentence of Policy CP4 Paragraph D should be amended as follows: To meet housing needs and regional requirements an annual target of 30% of new dwellings should be provided as affordable unless viability, development costs, funding circumstances the achievement of balanced communities prevent this or indicate otherwise.
82	10	2.50	CP4D		<p>Consideration such as development costs, availability of subsidy, and wider planning aspirations will be relevant and should be reflected in the policy submitted to the secretary of state. It is of particular importance, for instance, that consideration should be given to the need to establish a balanced community or communities within a development of the scale proposed. This particularly applies to larger scale development. By taking account of the such factors the policy would be more effective and represent a better alternative.</p>	

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82	11	2.52	CP4		the last 2 sentences of this para should be omitted as they are wholly inconsistent with Policy CP4 Para D which proposes that this should be a matter to be determined through supporting documents. They are not consistent with the policies of the CS and no supporting evidence base is offered.	Last 2 sentences of para 2.52 should be deleted.
82	12		CP5		<p>Policy CP5 should include a reference to the district centre to be provided within the EDA. The inclusion of a reference to the EDA should reflect the emerging proposals for the EDA in relation to retail development and the district centre and would assist in supporting the deliverability and implementation of the EDA in line with Policy SSP8 and in giving clear guidance in relation to the role of centres in the Borough - in accordance with PPS6.</p> <p>The EDA District Centre should contain a sufficient number and range of facilities to ensure its vitality as the hub of a sustainable urban extension and to obviate unnecessary travel by private car, while not undermining the planned regeneration of Swindon's central area.</p>	Policy CP5 para B should be amended as follows: Swindon Town Centre will be the pre-eminent location for major shopping development. Appropriate provision will also be made consistent with the establishment of a district centre within the EDA. Any major shopping development will be considered outside of Swindon Town Centre where it can be shown that: 1) it cannot be accommodated in the town centre, and 2) it will not diminish future investment in the town centre; and 3) it will not put at risk implementation of the Swindon Central Area Action Plan or any successor plans to this document
82	13	2.81 & 2.82	CP6		The approach set out is inflexible in terms of the level of prescription and not adequately supported by the evidence base. It is not the most alternative.	<p>Paragraph 2.82</p> <p>The School Place Planning Study has provided some historic evidence that this peak could amount to a significant need. Creative strategies will be required in order to manage any peak generated from needs, having regard to the wider provision for primary schooling at the time and including the possible temporary use of other buildings, or providing schools earlier than programme.</p>

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82	14	CP6		No further evidence has been presented to clarify the concerns that are highlighted in the Swindon School Place Study with regard to provision and distribution of Children's Centres. The evidence base is therefore uncertain.	Policy CP6 should refer to "up to 4 new children's centres". The proposed geographical distribution set out in para 2.85 of the CS is also inconsistent with Policy SSP8 para B (v). The proposed distribution should therefore be omitted from the CS.
82	15	CP10A		Whilst reference is made to the delivery of the canal in the Implementation and Delivery Plan, outside the town centre this simply identifies the lead agency as SBC and the cost to be £180 million. There is no budget or funding provision.	We do not see an adequate evidence base, tested or otherwise, that warrants the inclusion of the proposal in the Core Strategy. There is no evidence or deliverability. Therefore we strongly advise the deletion of Policy CP10A in its entirety but specifically outside the town centre.
82	16	SSP3		The policy should not seek to identify 55 hectares and then consider the task of providing an appropriate land supply to be complete. The Core Strategy should provide the framework for allocating land for employment purposes so that if further land is required then there is a clear strategy to address the need. This is necessary to provide the flexibility in the Core Strategy that is required.	The policy should be amended as follows: To meet the forecast growth in the economy at Swindon Borough, additional employment provision will be made at Swindon Central Area for 85,000m2 office space, and be directed to the following urban extensions: 1) EDA 35.0 hectares 2) Tadpole Farm 5.0 hectares 3) Commonhead 15.0 hectares. The provision made should be regarded as minimum requirements. Proposals for additional employment in excess of the minimum provision or in additional locations will be considered taking account of the progress in the delivery of employment land and economic development initiatives and the opportunity to support the provision of employment through mixed use developments.

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82		17	SSP8		The use of the phrase 'must provide' in Para B and C is inflexible and unjustified. The CS looks to a long time frame and many issues and the evidence base relating to them may change over this time. Moreover it is inflexible particularly given the very specific nature of some of the elements of the policy. It implies, it is not the intent, the outcome of a section 106 negotiation on certain infrastructure items that need to be considered further through additional evidence.	Para B and C should be amended to read 'Proposals for the EDA should seek to provide'. Less appropriate would be a rewording that "Proposals for the EDA should make provision for..."

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82	18	B (i)	SSP8		<p>The specific circumstances of large scale major developments, in relation to affordable housing, was specifically considered in the now adopted South Cambridgeshire CS and Northstowe AAP. The policy of the Northstowe Aap takes account of such circumstances as follows: "The starting point for negotiations concerning the provision of affordable housing at Northstowe will be policy HG/3 of the Development Control Policies DPD. However, this is a major and complex development which has a wide variety of requirements covering infrastructure and services, and a balance may need to be struck between competing requirements, in the light of economic viability". A similar wording is sought in relation to the provisions in relation to affordable housing in SSP8.</p>	<p>The following changes are sought in relation to affordable housing in the urban extension to the East of Swindon in para B(i). If policy CP4 is amended to 30% in accordance with the proposed change sought then the first sentence of Section B(i) should be replaced as follows: "The EDA should aim to achieve the provision of affordable housing in the EDA consistent with CP4: Housing. However this is a major and complex development which has a wide variety of requirements covering infrastructure and service, and a balance may need to be struck between completing requirements, in the light of economic viability, development costs and the need to secure a mixed and balanced communities" If CP4 is not amended then the first sentence of section of Section B(i) should be replaced as follows: "The EDA should aim to achieve at least 30% of dwellings as affordable housing. However this is a major and complex development which has a wide variety of requirements covering infrastructure and service, and a balance may need to be struck between competing requirements, in the light of economic viability, development costs and the need to secure a mixed and balanced communities."</p>
82	19	B (i)	SSP8		<p>To determine an overall net density at this stage is inflexible and not demonstrated to be the most appropriate outcome on the basis of the evidence available. Instead a range of densities should be proposed to provide the completion of the design lead approach to allow the delivery of the most sustainable outcome.</p>	<p>'A design led approach to density which provides for higher densities to support facilities and public transport, and lower densities towards edges and which seeks to achieve a net average density of 40-45 dwellings per hectare and'</p> <p>The last sentence of para 3.65 should be deleted.</p>

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82	20	b (ii)	SSP8		Whilst the policy provides an appropriate framework for the master planning process to be completed, the master planning process remains to be completed in detail. Some flexibility should therefore be recognised to allow the most appropriate and sustainable response to come forward from the process. The master planning process, considered in its widest sense, may support the introduction of more than 5000 jobs if this accords with the wider strategy for the delivery of employment opportunity in the borough. Some variation in the mix of jobs may also be justified through the master plan process.	Provision for at least 5,000 jobs including about 35 hectares of B-use employment land in accordance with SSP3: Distribution of Employment, which must complement and compete with Swindon Town Centre, including provision for: 2,800 jobs Class B1, 1,000 jobs ClassB8, 1,200 jobs Non Class B. The precise mix of accommodation and scope for B8 employment will be determined through the detailed masterplanning process taking account of the role of employment in securing the vitality of the EDA, the opportunity to capitalise on public transport and the ability to deliver the urban form required.
82	21	B (iii)	SSP8		To allow a responsive approach it might be sufficient to require within the policy simply that the education requirements of the EDA are provided for. Equally it is recognised that this provides little by way of steer in terms of issues such as secondary school provision.	Education Infrastructure to accommodate up to 14 forms of entry at entry at primary and secondary level to be provided in: 1) Two form entry primary schools each making provision for nursery/ early years facilities if required 2) The equivalent of 1 new secondary school within the EDA and extensions and improvements to existing schools in East Swindon or an alternative model that delivers 14 forms-of-entry. Creative strategies will be required in order to manage any peak generated from needs, having regard to the wider provision for primary schooling at the time and including the possible temporary use of other buildings, or providing schools earlier than programme.

<i>Respondent Ref</i>	<i>Comment No.</i>	<i>Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
82	22	B (v)	SSP8		In this context the EDA may or may not be an appropriate location to accommodate a children's centre but the evidence base has not concluded this today. Nor is the evidence base sufficient to indicate that any need arising for the children's centre is directly related to the EDA sufficient that this is a cost to be borne by the development (if that is the case).	Para B (v) should be amended to read 'Land will be safeguarded for children's centre if required.'
82	23	b (iv)	SSP8		Whilst there is a general conclusion that "it might be worthwhile establishing a new school within the EDA", there is little evidence that this is a considered conclusion rather than simply an opportunistic response. This seems insufficient basis for a policy response that the EDA should not simply make room for it, but "must provide it". Whilst some of the need may emerge from the EDA the assessment is based on the need generated by all new dwellings in Swindon. Hence the justification for the EDA to provide is not made. SEDAG is content that this issue should be considered further but not with the prescriptive policy approach in the policy.	Para B (iv) of Policy SSP8 should be omitted. If retained reference should instead be made within part C of the policy as follows: Proposals for the EDA must: consider the need to make provision to accommodate appropriate facilities for Special Needs arising from the development.
82	24	B (vi)	SSp8		It is proposed that the guideline figure for the provision of convenience retail in the District centre is restricted to the District centre. Whilst some local provision outside of the district centre will be appropriate, the scale will and should be limited, and inconsequential in terms of delivering the desired policy outcomes. Further guidance if appropriate on the nature of retail activity in the local centres may be provided in the EDA SPD.	Retail facilities around 7,300m2 of net additional convenience floorspace at the District, accompanied by comparison floorspace at the EDA District Centre of a scale and nature that is commensurate with its function, that does not compete with Swindon Town Centre.

<i>Respondent Ref</i>	<i>Comment No.</i>	<i>Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
82	25	B(Vii)	SSP8		<p>SEDAG considers that the proposals for the District Centre are generally appropriate and supports the centre as a mater of principle. SEDAG further considers that the each of the elements identified in the policy may appropriately be planned for in the District Centre.</p> <p>With regard to the provision of office floorspace in the centre, the precise extent of the floorspace that can be justified will reflect a detailed master plan approach.</p> <p>In terms of the delivery of other aspects of the District Centre it is unclear at this stage how each elements will be delivered in detail. Accordingly the policy should be changed through a minor amendment to reflect the lack of certainty as to precise delivery mechanisms.</p>	<p>A new district Centre in the North West of the site well located to serve the existing communities in East Swindon and new development at the EDA, comprising provision for: a) a food superstore, b) B1 employment use of around 35,000m2, c) a library, d)GP Surgery, e) recycling facilities, f) a Multi-Agency Centre incorporating multi-faith place of worship, community use facilities and office facilities for public sector organisations and partners, and g) a neighbourhood police point.</p> <p>The scale and form of the District Centre will be the subject of a detailed masterplanning exercise.</p>
82	26	(viii)	SSP8		<p>Para B (viii) refers to 5 neighbourhood centres, co-located with a primary school. The proposal for 5 neighbourhood centres is precise and prejudices the master planning process. A change in the wording with no impact on the overall objective of seeking to ensure appropriate education provision is proposed.</p>	<p>The following amendment is suggested to Para B (viii) of Policy SSP8: 'For [(around 5) or (no number) mixed-use neighbourhood centres, including one at South Marston, to be co-located where appropriate with a primary school to create local community hubs, comprising local shops and facilities, and making provision for a Multi-Agency Centre / Community Use Facility and a GP Surgery in at least one of the neighbourhood centres.'</p>

<i>Respondent Ref</i>	<i>Comment No.</i>	<i>Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
82	27	B (xi)	SSP 8		Whilst reference is made to the delivery of the canal in the Implementation and Delivery Plan, outside the town centre this simply identifies the lead agency as SBC and the cost to be £180 million. There is no budget or funding provision. We do not see an adequate evidence base, tested or otherwise, that warrants the inclusion of the proposal in the Core Strategy. There is no evidence of deliverability.	Para xi) should be deleted from the Policy. The indicative route should be deleted from the Proposals Map.
82	28	B (xii)	SSP 8		The policy acknowledge that achievement of the housing trajectory depends on the timely delivery of sewage treatment capacity at the EDA should that prove necessary to secure the implementation of the housing trajectory.	To ensure that the policy is flexible and is the most appropriate alternative, Policy SSP8(xii) should be amended as follows: Safeguarded land for a new sewage treatment works if required by the Swindon Water Cycle Study or necessary to progress the early delivery of the EDA.
82	29	xv	SSP8		The rationale for the park and ride site within the EDA needs further justification and the demonstration of an appropriate design solution through the detailed application process and should be regarded as an aspiration to be considered (along with other options) rather than a development requirement. It is clearly not necessary in terms of planning obligation requirements. The absence of any such justification sits sharply at odds with the expectation in the policy to provide and park and ride and not safeguarded a site for.	The requirement to provide a park and ride site should be omitted from the policy. Should any policy reference be made, then this should be phrased in the following or similar manner: 'Should be capable of accommodating a site for the provision of park and ride subject to further evaluation of alternatives demonstrating that an appropriate location falls within the urban extension and to a demonstration that provision is consistent with the design vision and strategy for the urban extension'.

<i>Respondent Ref</i>	<i>Comment No.</i>	<i>Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
82	30	B (xiv)	SSP8		The proposals for the EDA will need to support, make provision for, take account of, the bus rapid transit system and will make every effort to do so. A literal interpretation of Policy SSP8B(ix) that supposed that the EDA must provide a bus rapid transit system would not be accurate. This is not intended to be the case. For clarity, the proposals a wording change is proposed. This will secure the most appropriate and deliverable wording.	xiv) Transport infrastructure to minimise the impact of development upon the existing transport network and to integrate the EDA with the existing urban area, particularly Swindon Town Centre, including; 1) provision for the appropriate elements of a Bus Rapid Transport system that operates between the EDA District Centre and Swindon Town Centre. 2) A permeable street layout, to maximise walking and cycling within the site. Significant improvements to White Hart Roundabout.3) Significant improvements to White Hart Roundabout. 4) A new link to include a Green Bridge around Covingham Drive. 5) A new link to the EDA across the A419 at Dorcan. 6) A new link between the EDA and Commonhead Roundabout and/or the new link at Dorcan as just one element of the overall movement network. 7) A new link across the Bristol to London railway line connecting the development north and south of the railway line. 8) Measures to minimise rat-running through villages around the EDA and east Swindon.
82	31	B (Xiv)	SSP8		Phasing of Bus Rapid Transit. On the same basis since the delivery of the rapid transit system is lead by SBC, the timing of the system in relation to the first phase of development at the EDA needs broader consideration than simply by the developers of the EDA. To this end the Borough Wide Transport Strategy but also the EDA SPD will be addressing the phasing issues relating to the rapid transit and the EDA. Reference in this section of the Core Strategy is therefore inappropriate and unnecessary.	

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82	32	B (xiv)	SSP8		New link between the EDA and Commonhead Roundabout. The internal movement network will nevertheless need to provide a flexible movement network which is probably best achieved through a permeable grid without any routes being affordable particular (least of all strategic bypass) status. However the reference to local access is unclear and confusing if links are required between the EDA and Commonhead.	
82	33	B (Xiv)	SSP8		SEDAG has undertaken considerable modelling of the EDA development and its traffic and transport implications. Whilst this work remains to be finalised, one potential scenario is that it is not necessarily the case that the Commonhead Link becomes a requirement of the 12,000 dwelling scheme. This remains to be resolved but is indicated here to make the point that the Core Strategy should be careful to avoid a prescribed transport solution. To this end the policy should be reworded to incorporate better the flexibility that may exist in the delivery of the transport strategy and to provide clarity.	

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82	34		SSP8		<p>Para c (i) proposes that proposals for the EDA must be in accord with the Green Infrastructure Strategy. At this point in time the emerging GI Strategy has not been finalised and therefore it is unreasonable to be able to comment on whether it is appropriate for green infrastructure within the urban extension to be designed according to the green infrastructure strategy without knowing how prescriptive and detailed that strategy might be.</p> <p>The principles of the strategy are however supported as are the bullet points in the policy. A minor clarification pending the completion of the Green Infrastructure Strategy is therefore proposed.</p>	C (i) "be in accord with the principles of DMP8 and must: provide direct linkages...
82	35	Figure 16	SSP8		<p>SEDAG argues strongly that the Core Strategy is an inappropriate location for Figure 16 and that the SPD should provide the level of detail necessary below the Proposals Map and Key Diagram. It is well advanced and the LPA is considering objections comprehensively. It is wholly unnecessary and confusing to include Figure 16 in the Core Strategy and SEDAG argues strongly that it should be deleted from it.</p>	<p>Figure 16 be deleted.</p> <p>Were a similar figure to remain, contrary to our firm view, then it should be amended in accordance with the plan attached to the representations on the SPD.</p>
82	36		Key Diagram		<p>The inclusion on the Key Diagram of locations for employment and the District Centre within the EDA are not a matter of significant concerns. SEDAG question whether the added level of detail is required given the preparation of the SPD for the EDA wherein potential locations are explored further.</p>	Delete notation of District Centre and employment from Key Diagram.

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82	37	Subsection (ii)	SSP13		<p>A concern is the language of the draft policy in subheading ii) and in relation to the creation of strategic gaps.</p> <p>Provision for a strategic gap in the form presented is likely to be contrary to key sustainability objectives. The ability to retain the character and identity of South Marston is not dependent upon the creation of strategic gaps or degrees of separation but high quality and careful design and if appropriate the extension of the Green Infrastructure network. The policy should be modified accordingly.</p>	ii) provision will be made for an extension of the green infrastructure network fulfilling the purposes of Green Infrastructure, between South Marston and the remainder of the EDA.
82	38	Section iii	SSP13		<p>The potential expansion of South Marston as identified in the EDA SPD is of a significant scale. The evidence base EDA Framework prepared on behalf of the Council notes that the area south of the existing village of South Marston should respect the existing character of South Marston and this it should. It nevertheless remains part of the EDA and the character should equally take account of the wider proposals for the EDA to ensure a district approach.</p> <p>Subsection iii implies that the form of the extended village should replicate the character and form of the village. This might be a step too far. Careful regard should be had, but not necessarily slavishly adhered to. A minor rewording would assist.</p>	iii) Expansion as part of the EDA (at Policy SSP8), of South Marston must have regard to the character and form of the existing village and this will be controlled through the preparation of Design Codes.

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82	39		SSP13		The delivery of the local facilities at South Marston will need to be assessed carefully. Some will be appropriate at South Marston and provided by development. Others will be delivered by other means including through funding. The wording should recognise the alternative means of delivery.	iv) New and enhanced local and community facilities should be provided or otherwise funded at South Marston including, retail, community and recreation facilities associated with the EDA.
82	40	vii	SSP13		The addition of specific reference to a specific field south east of the recreation ground is inappropriate detail in a core strategy and should be deleted. All such matters should be addressed through the master planning process and development of the proposals in the EDA SPD.	vij) Formal and informal open space will be provided within or adjacent to the village commensurate with the scale of development provided.

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82	41	DMP1 (10)		<p>There is no evidence or justification to provide a policy basis for enhanced standards. In terms of implementation - by how much should development exceed Building regulations. Nor does it provide the flexibility that is built into Code for Sustainable Homes and that would be frustrated if an additional policy layer effectively decreed how code requirements might be met. Nor is there any estimate of costs in relation to enhanced Part L requirements.</p> <p>In relation to energy efficient light fittings, the evidence base, in para 8.3.2 simply indicates that such fittings will be the norm in 2011 and this should be introduced early. It is unnecessary for the Core Strategy to address matters that will be addressed properly through other channels - in this case legal requirements re the phasing out of tungsten bulbs. If there is a timetable for this nationally then there is a reason for it. No evidence is provided to why these reasons should be set aside in Swindon.</p>	<p>Development proposals shall be supported by a proportionate energy assessment which:</p> <p>1) shall demonstrate the expected CO2 emissions savings from energy network. The assessment shall address the energy hierarchy of reducing demand prior to inclusion of low and zero carbon energy technologies.</p> <p>2) shall demonstrate that the design, layout, orientation and solar control of the individual buildings and the wider development has been assessed in order to reduce total energy demand and reduce the risk of overheating including from expected external temperature increases due to climate change.</p>
82	42	DMP1 (11)		<p>The policy does not reflect any variation that may occur in the national programme for technical or other reasons. It should be more explicitly linked with the national programme.</p> <p>In relation to BREEAM standards, nowhere in the evidence base is there an assessment of the economic costs of the impact of introducing BREEAM excellent. The costs are very substantial indeed and the potential impact on the Core Strategies employment policies considerable.</p>	<p>The proposed policy should be amended as follows:</p> <p>Subject to the implementation of the following standards at national level major development shall meet the following standards of sustainable construction</p> <p>2010/11-2012/13 Level 3 2013/14-2015/16 Level 4 2016/17 Onwards Level 6.</p>

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82		43	DMP1		In the evidence base the justification appears in para 8.3.5 it argues that the proposed redraft of Policy G of the Draft RSS seeks to set out a minimum BREEAM standard of very good. It is then argued that since Swindon aspires to do better than elsewhere a minimum requirement of excellent is required. There is no proposed redrafting of Policy G of the Proposed Changes to the RSS. As is recorded in the evidence base this simply comprises the representations of the South West Regional Assembly on the proposed Changes. They have no status. The Proposed Changes alone carry status and considerable status. The proposed changes make no reference to BREEAM standards and indeed deleted the reference in the draft to very good.	
82		44	DMP1		Nowhere in the evidence base is there an assessment or overview of the impact of the policies in relation to enhanced thermal performance, sustainable construction and low carbon energy on the development economics and the prospect of the delivery of the housing requirements of the Core Strategy. It is somewhat incongruous that in Swindon, some of the most demanding increases in the rate of housing delivery are anticipated alongside some of the most demanding increases in the cost of delivery associated with the implementation of the Councils sustainable construction and energy policies.	

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82	45	DMP1 (12)		<p>The policy appears to accelerate the CO2 reductions over and in excess of that anticipated through the CSH programme.</p> <p>Targets are well in excess of the regional levels. A percentage CO2 reduction requires a higher proportion of energy from renewable sources. A 15% reduction in CO2 might require for instance a 20% renewable contribution.</p>	
82	46	DMP1 (12)		<p>Nowhere in the evidence base is there an assessment or overview of the impact of the policies in relation to enhanced thermal performance, sustainable construction and low carbon energy on the development economics and the prospect of the delivery of the housing requirements of the Core strategy. It is somewhat incongruous that in Swindon, some of the most substantial increases in the rate of housing delivery are anticipated alongside some of the most demanding increases in the cost of delivery associated with the implementation of the Councils sustainable construction and energy policies.</p>	<p>Major development shall achieve the delivery of 10% of regulated energy requirements from low and zero carbon energy generation on-site, or in the locality of the development as long as a direct physical connection is used, unless it can be demonstrated that such provision is not technically or economically viable.</p> <p>Delete Table 6 If it is demonstrated that for a particular site the CO2 reductions are not technically or economically viable or are otherwise inappropriate, then the a contribution to the Swindon Carbon Offset Fund will be appropriate.</p>

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82		47	DMP1 (12)		<p>SEDAG supports the establishment of the carbon offset fund and sees substantial benefit if the fund is able to support mechanism to deliver improvements in the energy efficient of the existing stock. Since whatever standards are adopted, the new dwelling in the new development areas will be built to much higher standards than historically, the potential benefits of delivering off site improvements instead of on site measures appear considerable. To this extent it is unclear why this method of addressing CO2 reductions should be limited to circumstances where CO2 reductions cant be delivered on site. There may be other reasons that viability or technical feasibility where on site renewable energy may not be the best solution. At present the policy working will limit considerably the potential for contributions to the Carbon Offset Fund and hence the ability to bring more significant wider benefits.</p>	<p>If it is demonstrated that for a particular site the above CO2 reductions are not technically or economically viable or are otherwise inappropriate, then the maximum possible savings should be made on-site, with the balance of renewable energy provided via contribution to the Swindon Carbon Offset Fund which will be set up by the Council and detailed in the Swindon Sustainable Design and Construction SPD. This fund will be used to facilitate sustainability initiatives and reduce carbon emissions in the existing building stock.</p>
82		48	DMP1A		<p>Para C of Policy DMP1A incorporates the phrase 'in all areas' and 'in the area and beyond', both of which are unclear in their meaning. We suggest that para C be omitted from policy DMP1A as the extent of the area to be considered is unclear. In addition, it duplicates the outcome of paras A and B of the same policy and of guidance in PPS25 (para 6)</p>	<p>the first sentence of the policy should be rephrased as follows: The opportunity should be made to reduce the overall level of flood risk in the development through the layout and form of development.</p>

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82		49	DMP2		Para A uses the term 'where necessary' which is repeated in bullet point (i). This term is unclear in its meaning and is not consistent with the tests set out in para B5 of Circular 05/2005. We also suggest that bullet point (i) should refer to the availability of other funding sources, as the delivery of the SUE by the developer will be in partnership with service providers and other funding streams and this should be acknowledged.	Policy DMP2 should also include a reference to commitments to secure the investment of the contributions received in a timely manner or, alternatively, the refund of the unspent monies. We suggest the following additional wording to Para B (iii):and include mechanisms to ensure the timely investment of monies received or, alternatively, refund of any unspent monies.
82		50	DMP2		Bullet point (iii) proposes to require that development provides for the 'ongoing maintenance' of facilities provided as a result of the development. This is unclear in respect of which facilities should be maintained, in particular whether it refers to those funded by the development or any facilities provided by any other organisation or agency. It is also unclear in respect of the period of time for which maintenance should be provided.	
82		51	DMP2		Circular 05/2005 Planning Obligations, ODPM, 2005 states that planning obligations must be necessary, directly related to the proposed development and fairly and reasonably related in scale and kind to the proposed development (para B5). Bullet point (iii) should include the term 'where appropriate' as the details necessary to assess the tests of Circular 05/2005 will only be available as individual proposals are progressed.	
82		52	DMP4A		Please refer to comments under CP4: Housing and Policy and SSP8: Eastern Development Area Paragraph B (i).	Para A (i) of Policy DMP4A should be reworded to refer to 30% of affordable units rather than 35%.

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82		53	DMP8		Para A7 of Policy DMP8 proposes that development proposals should 'contribute to the delivery of the wider GI network'. It is of course necessary for the urban extension to make proper provision for the appropriate Green Infrastructure facilities to serve the population. It is not appropriate to expect development to contribute to the delivery of the wider network beyond the development site and to do so is not consistent with the tests set out in para B5 of Circular 05/2005.	It is proposed that Para A should be omitted and is unnecessary given the introductory text in Para A of Policy DMP8.
82		54	SSP8		At the scale produced, the diagram is simple that - rather than a precise drawing. To this extent the boundaries are crudely drawn - not reflecting field boundaries, ownership boundaries or recognisable features.	

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82	55	SSP8	Diagram	<p>Whilst there is a strong and robust evidence base to support the general identification of the boundary of the EDA on the CS Proposals Map it is appropriate that the boundaries be amended to provide greater flexibility to ensure that detailed master planning is not constrained by the boundary drawn. In this regard a number of assumptions are made within the EDA Development Framework and SPD regarding land use budget components. These will require refinement and it is often the case that further land is required as proposals are developed, further technical work completed, additional demands made. No allowance is made for instance for the retention of existing features within the site as hedgerows and it will only be determined through detailed design how much of the estimated total requirement for open space can really be accommodated within the Green Infrastructure network.</p>	
82	56	SSP8	Diagram	<p>While the clarification of the document in the manner suggested above will help address a number of issues. SEDAG proposes a number of changes as shown on the attached plan.</p>	<p>Minor changes are proposed to the boundary of the EDA boundary:</p> <ol style="list-style-type: none"> 1)To reflect existing hedge lines and ownership boundaries and give comfort that the Dorcan link may be provided within the red line; 2)To include a small section of land now shown to be lying outside any floodplain on the north east boundary; 3)To include a small development block off Thornhill Road consistent with the representations made in response to Question 3 4)The tidying up of the development block to include additional land outside the floodplain immediately to the south of the A420.

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82	57		SSP2		We support the figure in Table 4 of 12,000 dwellings to be located at the EDA. This figure reflects Policy HMA2 of the South West RSS Proposed Changes (July 2008) requiring the delivery of 12,000 homes to the east of Swindon.	
82	58		SSP8	Diagram	Status of the Diagram: There is no immediate cross reference from the text of the SPD to the key diagram. It is suggested that reference could be made to the drawing at the end of para 1.6 or perhaps following section 3.2.	
82	59		DMP5		Para (vii) of Policy DMP5 exceeds the requirements of Circ 05/2005 with regard to planning obligations. Circular 05/2005 Planning Obligations, ODPM, 2005 states that planning obligations must be necessary, directly related to the proposed development and fairly and reasonably related in scale and kind to the proposed development (para B5)	Para (vii) should be amended to : 'Contributions where appropriate towards the design, construction and maintenance of new and/or enhancements to existing off-site transport infrastructure and services within the Borough directly, fairly and reasonably required to mitigate the impact of development.'
82	60	E (i)	DMP6		Para E (i) suggests that all archaeological remains and landscapes of acknowledged importance should be preserved in-situ. This may not be appropriate in all cases and the policy should have flexibility to acknowledge this. Reference to Historic Landscape Characterisation should be omitted as these are not required or promoted by PPG 15: Planning and the Historic Environment, DoE, 1994.	Para E (i) should be amended to : 'Preserve in-situ where appropriate archaeological remains and landscapes of acknowledged importance and protect their settings - as shown on the Proposals Map. Investigation via evaluation or other discovery may uncover sites to which this policy should properly apply.'
82	61	E(ii)	DMP6		The phrase 'not covered above' should be omitted from Para E (ii) as it is unnecessary.	The phrase 'not covered above' should be omitted from Para E (ii).

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82		62	DMP8		<p>Para C bullet point 3 should be omitted as it exceeds the requirements of Circ 05/2005 with regard to planning obligations.</p> <p>Circ 05/2005 Planning Obligations, ODPM, 2005 states that planning obligations must be necessary, directly related to the proposed development and fairly and reasonably related in scale and kind to the proposed development. (para B5).</p>	Para C bullet point 3 should be omitted.
82		63	SSP2		<p>SEDAG support the figure in Table 4 of 12,000 dwellings to be located at the EDA. This figure reflects Policy HMA2 of the South West RSS Proposed Changes (July 2008) requiring the delivery of 12,000 homes to the east of Swindon. It has been the subject of exhaustive scrutiny through the RSS process and benefits from detailed master planning work carried out on behalf of the Borough Council and its partners and by work undertaken by SEDAG.</p>	
86		1	CP3, SSP3		<p>In its current form, the Core Strategy, and in particular CP3 and SSP3, fail to demonstrate sufficient flexibility in relation to the issue of new additional employment development either within or on the edge of Swindon. SSP3 places too great a reliance on new employment land coming forward at the three urban extensions (55ha) which due to extensive and costly infrastructure requirements may not become available until towards the end of the plan period, thereby leaving a possible shortfall of available and suitable employment sites in the interim period.</p>	

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86		2	CP3		The current wording of CP3 is not sufficiently flexible and therefore contrary to emerging government planning policy guidance in the form of draft PPS4.	<p>With due regard to the provision of the draft PPS4, the provisions of CP3 should:</p> <ul style="list-style-type: none"> - Maximise job opportunities in the Borough and not discriminate against any particular sector of economic development; - Understand the needs of existing businesses and account for local characteristics; - Support existing employment sectors; - Acknowledge the fact that Swindon's economic future cannot be predicted for certain and therefore must be flexible in terms of the supply and the use of employment land; - Identify a good range of sites for economic development; - Relate to all aspects of 'economic development' as defined in PPS4, which includes light, general and heavy industry, and storage and distribution.
86		3	CP3		<p>The Core Strategy 'Submission Document' confirms at para 2.24 that there is a requirement to provide 128ha of employment land within the Swindon Travel To Work Area, of which some 55ha are to be provided through additional sites at Swindon.</p> <p>The adopted SBC Local Plan allocates several medium/large employment sites, however the implementation of employment development upon many of these larger sites has not been achieved.</p>	

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86		4	SSP3, CP3		<p>In addition, SBC has resolved to grant outline planning permission upon site allocation E4(19) for development comprising the demolition of the existing Abbey Stadium and construction of a new stadium with youth training facilities, 16,745 m2 of B1 floorspace, a care home and 450 residential dwellings (access not reserved). The SBC resolved to grant planning permission subject to the applicant entering a planning obligation and subject to referral to the Secretary of the State., who subsequently resolved not to recover the application and thru the LPA will be granting the planning permission subject to securing a planning obligation with the developer.</p> <p>The significance of this is that it proposes a significant amount of non-employment uses upon the allocated Groundwell West employment site. As a consequence, the proposal fails to deliver the amount of employment development required by the adopted Development Plan. Responses made as part of the consultation process included:</p> <p>SBC Forward Planning:</p> <ul style="list-style-type: none"> - Other large sites in the Borough are not available or deliverable at present; - The Abbey Meads (Groundwell West) Employment Site represents the only available or medium sized sited in the Borough; - The loss of employment land to residential use will remove the opportunity for it to realise its full potential for creating jobs; - No sequential test has been made. <p>SBC Economic Development Officer:</p> <ul style="list-style-type: none"> - Concerned that the employment 	<p>There is a current pressing requirement to allocated small/medium size sites and it is considered that the Lady Lane site can contribute to alleviating this shortfall due to its size, its location adjacent to urban development, its ability to deliver development in the short term and its ability to deliver a proportion of the employment land that the Groundwell West allocation is likely to fail to deliver.</p> <p>Additional flexibility is required within the Core Strategy to address the above issues, and the following wording is suggested as an addition to CP3 and/or SSP3:</p> <p>"Development proposals for new or expanded 'Class B' employment uses, wither within or on the edge of Swindon, will be permitted provided that:</p> <ul style="list-style-type: none"> (I) The development does not by virtue of its scale, form or character result in an adverse impact on its environs and/or the surrounding countryside; (II) It can be demonstrated that the development will not have a detrimental impact on the provision or delivery of new town centre office accommodations; and (III) The development is appropriate in relation to the availability of existing and proposed services in the settlement.

<i>Respondent Ref Comment No. Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
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generating potential of Abbey Meads as one of the only immediately available employment sites of any significant size in the Borough that could meet short-term market demand could be lost;
- The Employment Land Study recognised a severe shortage of large sites ready to attract new investment or enable growth and expansion of existing companies. The loss of this land would further erode this position.

It is recognised that the large allocated employment sites are unlikely to be brought forward in the short term. Therefore a current need exists to not only provide significant employment land to meet the requirements of the Draft RSS, but also to meet the requirements of the current adopted Development Plan whose allocated sites are unlikely to be implemented in the plan period. In terms of identifying appropriate employment sites within the Core Strategy, there is an urgent requirement to establish sites that can contribute to employment land supply in the short, medium and long term.

<i>Respondent Ref</i>	<i>Comment No.</i>	<i>Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
86		5	SSP3		<p>We would submit that, due to its character and immediate proximity to the existing employment areas at Groundwell, our client's land at Lady Lane (0.8ha) is well placed to accommodate additional employment development to the North of Swindon. The size and location of the land lends itself to B1, B2, B8 and it may also be compatible with other 'sui generis' uses. The site is opposite the current Abbey Stadium and it also accommodates existing employment uses, and the new A419 Blunsdon bypass provides suitable access onto Lady Lane.</p> <p>Due to the development that the site has recently experience, the quality of the sire for agricultural purposes has been irrevocably damaged, and is no longer fit for such purposes. As such, the site presently has limited land use potential. Two indicative site layouts (contained within Appendix A) have been prepared to demonstrate that employment can be readily accommodated upon the site.</p>	
94		0	CP8, DMP2		<p>These policies contain all the elements required for a thoughtful and forward looking framework for the cultural needs of the Borough. It is important to provide, protect and promote your cultural facilities for their leading role in the quality of cultural life and their valuable contribution to the character and function of Swindon.</p>	

<i>Respondent Ref</i>	<i>Comment No.</i>	<i>Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
94		1	CP8		<p>Policies CP8 Culture and DMP2 Infrastructure</p> <p>This policy contains all the elements required for a thoughtful and forward looking framework for the future cultural needs of the Borough. Good quality community and cultural facilities are essential components in the development of sustainable communities. It is important to provide, protect and promote your cultural facilities for their leading role in the quality of cultural life and their valuable contribution to the character and function of Swindon</p>	
96		1	SO2		<p>Crest have no objection to a policy which requires infrastructure needs for and arising from the growth of Swindon to be provided.</p>	
96		2	SO2		<p>It must be demonstrated that the requirement (for developers to contribute towards infrastructure needs for and arising from the growth of Swindon) complies with the guidance in Circular 05/2005 Planning Obligations I.e. that it is reasonable and necessary for the development to proceed. Additionally there is no justification in the Circular for new developments to rectify infrastructure needs from past under investment (Circular 05/2005 para B9).</p>	<p>The policy either needs to be amended and the reference to past under investment of infrastructure deleted or clarification should be provided within SO2 that new development will not be required to fund past under-investment of infrastructure. Until such clarification/amendment is made Crest object to the policy.</p>

<i>Respondent Ref</i>	<i>Comment No.</i>	<i>Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
96		3	SO2		The project team agree with the principles of the WSP strategy in relation to the use of a bus based transit system and SMART travel choices. However, uncertainty exists and further clarification is required in relation to the decision to include the Purton Road/Great Western Way Link Road within the strategy. WSP and SBC have produced no evidence to justify the delivery of this scheme. Furthermore, the inclusion of a highway infrastructure scheme to reduce car delay/increase capacity and reduce journey times is in direct contradiction of the sustainable transport strategies proposed.	The money that would be required to deliver such a scheme would be better spent developing an effective sustainable transport system that would meet the aspirations of Swindon becoming the most sustainable town in the UK. Such an approach would accord with the aspiration in the Core Strategy, the 2026 Swindon Transport Strategy and in the DfT document 'Low Carbon Transport'.
96		4	SO4		Crest support the objective of this policy to meet Swindon's housing needs by 2026.	
96		5	SO4		In meeting housing needs reference must be made in the policy to the requirement to utilise greenfield sites to meet the strategic housing requirement. It is accepted in the Core Strategy that the Borough's future housing needs cannot be met from redeveloping brownfield sites alone. The emerging Draft RSS identifies the need for sustainable urban extensions on greenfield land on the edge of Swindon.	In such circumstances the policy needs to be amended to recognise the need to utilise greenfield land.
96		6	SO7		Crest support the principle of this policy to create a transport system for Swindon which is sustainable, efficient, safe, affordable, accessible and easy to use. They also agree that priority must be given in the future transport strategy for the area to walking, cycling and public transport initiatives.	

<i>Respondent Ref</i>	<i>Comment No.</i>	<i>Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
96		7	SO7			Crest suggests that additional monitoring indicators should be added to include: - Air quality; - Length of cycle lanes delivered; - Numbers of secure cycle storage spaces provided at schools, town centre and station.
96		8	SO7		Crest note the inclusion of the Purton Road to Great Western Way link, a major road building scheme described as a 'sustainable transport' initiative under CP7. There is no justification within the WSP Transport Study for the construction of this Link Road or its delivery. Experience around the world shows that the provision of unregulated additional road capacity simply results in increased car use, increased congestion, poorer air quality and reductions in the use of alternative sustainable transport modes. Accordingly, Crest objects to the inclusion of the Road Link within the Core Strategy on the basis that it would undermine the stated targets of SO7.	
96		9	SO10		Crest fully supports this policy. As part of their proposals for Tadpole Farm, Crest intend to provide a green framework which will link the proposed neighbourhood with the existing communities to the south to the countryside beyond (see illustrative Masterplan contained within the Tadpole Farm Evidence Base).	
96		10	CP2		Crest have no objection to the principle of this policy which seeks to ensure that development proposals provide essential infrastructure to support new development and to meet the needs of the new communities in those developments.	However the policy should be amended to make reference to the advice in Circular 05/2005 'Planning Obligations'.

<i>Respondent Ref</i>	<i>Comment No.</i>	<i>Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
96	11		CP2		The Core Strategy aspires to see funding realised for the Purton Road to Great Western Way link. Policy CP2 B is worded to seek contributions to the provision of necessary improvements on an individual or cumulative basis.	<p>Whilst that principle may be sound we are anxious to ensure that CP2 should be clearer about the circumstances that would justify a contribution and suggest the following wording:</p> <p>"Where it can be shown that new developments individually or cumulatively generate a requirement for infrastructure investment and that that infrastructure represents the most sustainable investment for the wider community, meeting the carbon, water reduction and energy saving targets of the Core Strategy and that the individual developments cannot proceed in the absence of the "wider community" infrastructure solutions, then new developments should contribute to that infrastructure on the basis of their proportionate reliance, along the principles of Circular 05/2005."</p> <p>This will ensure that new development provides infrastructure and services which are directly related to the nature and scale of the proposed development and proportional to its effect.</p>
96	12	2.9	CP2		Para 2.9 suggests a very restricted definition of hard infrastructure.	Crest considers that the definition should also include investment such as buses, public transport facilities, cycle links and storage facilities, footpaths, signals and urban control systems whilst soft infrastructure should include travel plan coordinators, web systems and car sharing initiatives.

<i>Respondent Ref</i>	<i>Comment No.</i>	<i>Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
96	13		CP2A			<p>Crest considers that the policy should be amended as follows:</p> <p>CP2A iv) New Rising Mains ... if necessary to meet the needs of development proposals.</p> <p>CP2B Waste Water ... if necessary to meet the needs of development proposals.</p>
96	14		CP4		Crest supports this policy in so far as it is proposing to meet housing targets set out in the emerging RSS for the South West (dRSS) of 34,200 additional dwellings in Swindon Borough 2006-2026.	

<i>Respondent Ref</i>	<i>Comment No.</i>	<i>Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
96	15	D, 2.50	CP4		<p>Crest object to criterion D in respect of affordable housing provision. Whilst they have no objections to the principle of providing affordable housing to meet clearly identified local needs they consider that the propose target of 35% is not based on any sound evidence base.</p> <p>In reference to para 2.50, it would appear that the justification for the 35% is primarily based on the emerging Draft RSS (dRSS) for the South West. The dRSS provides guidance over the entire South West region and the detail contained within it is not necessarily applicable in all areas. Clearly the Core Strategy's Housing Needs Survey concludes that 30% is the appropriate level for Swindon Borough.</p> <p>Setting the level at 35% contradicts para 29 of PPS3. There is no Viability Assessment to underpin and justify the target level of affordable housing. Crest therefore object to this policy and require that the target level of affordable housing be amended.</p>	It should be revised to 30% in line with the Housing Needs Survey and taking into account the viability testing of the scheme.
96	16		CP5		<p>Crest object to this policy in that they consider for consistency that criterion B should be expanded to include the proposed local centre which is being proposed as part of the Tadpole Farm Smaller Scale Urban Extension This would be consistent with the terms within SSP9.</p>	

<i>Respondent Ref</i>	<i>Comment No.</i>	<i>Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
96		17	CP5		At present Swindon suffers from significant proportions of retail out commuting with many residents choosing to shop outside the Borough. Improvements to local facilities and the location of major trip ends (e.g. schools) in relation to sustainable transport corridors and residential areas will reduce the domination of the private car and school kilometres travelled. The Tadpole Farm transport strategy has been developed to enhance accessibility and ease sustainable links with local amenities and destinations, initial accessibility assessments have indicated that the Tadpole Farm development will significantly improve existing NDA accessibility conditions. This will not only provide a benefit for future residents but will also improve access for existing residents of Priory Vale.	Crest require the policy to be amended to include reference to the proposed local centre within the Tadpole Farm development.
96		18	CP6		Crest has no objection to providing education provision provided that it is justified for the proposed development.	
96		19	CP6		Crest object to any development having to make up for past deficiencies.	

<i>Respondent Ref</i>	<i>Comment No.</i>	<i>Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
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CP7

Crest support this policy in respect of the provision of bus based rapid transport, enhanced bus services, new bus terminus, walking and cycling measures and urban traffic management. Crest are promoting an urban extension at Tadpole Farm and are proposing to incorporate these initiatives as part of their contribution to meeting the sustainable transport needs of that neighbourhood, whilst contributing to the realisation of Swindon's wider Transport Strategy. Crest's investment will also improve the public transport offer for a wide area of North Swindon.

<i>Respondent Ref</i>	<i>Comment No.</i>	<i>Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
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CP7

We object to the Council's reference to the Purton Road/Great Western Way Link Road being termed a 'sustainable transport improvement'. To date no technical evidence has been presented to justify the need, cost and deliverability of this highway infrastructure. The Tadpole Farm project team has carried out a detailed technical assessment of a new bus-based rapid transit scheme from Tadpole Farm through the NDA and can confirm that the proposals can be delivered with a circa 20-minute journey without the Purton Road/Great Western Way Link.

We also consider that the inclusion of this Link Road in the Core Strategy is contrary to the stated objectives. Whilst Swindon has the aspiration to be the most sustainable town in the country the provision of new, unnecessary highway infrastructure will encourage further reliance on the private car. To date this highway scheme has not been adequately demonstrated as being a key component of a sustainable access strategy for the town and delivery of the route would undermine the walking, cycling and bus-based sustainable transport measures proposed as part of the Tadpole Farm sustainable access strategy.

<i>Respondent Ref</i>	<i>Comment No.</i>	<i>Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
96		22	CP7		Whilst we agree with the principles of the WSP Transport Strategy we call into question the methodology used to justify the road building elements and the lack of clarity as to why the Purton Road/Western Way Link Road is required to facilitate the sustainable transport measures. In particular para 2.107 refers to the need for a new transport route linking North and South Swindon to Swindon's Central Area. We consider any new infrastructure should only be introduced to maximise accessibility by sustainable modes and not to increase road capacity for car users.	
96		23	CP7		Whilst we are supportive of the transport strategy conclusions relating the importance of Park and Ride sites (para 2.103) we question how the council proposes to include these as a central element of their policy following the mothballing of the Groundwell Park and Ride early in 2009.	
96		24	CP10		Crest support this policy which seeks to provide a network of green infrastructure which would link existing and proposed communities. Crest are promoting a green infrastructure strategy for their sustainable urban extension at Tadpole Farm which would link the existing urban area with the new community and the countryside beyond.	
96		25	SSP2		Crest support the proposed location of new development and the identification of Tadpole Farm as a Smaller Scale Urban Extension for 2000 dwellings.	

<i>Respondent Ref</i>	<i>Comment No.</i>	<i>Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
96		26	SSP2		Crest consider by reason of all the background work undertaken, that the Tadpole Farm site could accommodate more than 2000 dwellings (see Tadpole Farm Evidence Base Reports). The site is not constrained by environmental (see RPS Landscape and Ecological Reports) or infrastructure issues (see SLR Technical Document and SK Transportation Strategy) to the extent that 2,000 dwellings is the maximum acceptable level of development which could be supported. Additional development would not only represent a more sustainable use of the site but it would also assist in reducing pressure on the release of other non-identified greenfield sites, especially given the levels of housing delivery that needs to be provided.	Crest therefore recommend that the policy be amended to recognise the ability to increase the number of dwellings at Tadpole Farm to say 2,500 dwellings. Given the lack of constraints on the site it would be possible to accommodate this additional development utilising slightly higher densities or using land not constrained to achieve this additional development.
96		27	SSP2		Crest are concerned that other identified sites such as the EDA may not be developed at the rates anticipated. That site is understood to have a number of infrastructure and funding issues to be resolved before development can commence. In such circumstances, there is likely to be a shortfall in the housing provision within Swindon. The additional development at Tadpole Farm would provide a realistic response to any potential shortfall especially as Crest envisage that development at Tadpole Farm could be commenced by 2011/12 (see Tadpole Farm Evidence Base including Delivery Report).	

<i>Respondent Ref</i>	<i>Comment No.</i>	<i>Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
96	28		SSP9		Crest fully support the identification of Tadpole Farm as a Smaller Scale Urban Extension to assist meeting some of Swindon's development needs in the period up to 2026. The identification of Tadpole Farm for development is soundly based, following a comprehensive strategic assessment of potential sites around Swindon within the Small Scale Urban Extension Study. That study concluded that Tadpole Farm was the most sustainable location to accommodate development.	
96	29		SSP9		Tadpole Farm represents a logical realistic allocation which can be delivered within the timescales of the Core Strategy. Crest consider that the capacity of the site should be increased to 2,500 dwellings. Crest therefore support the principle of Tadpole Farm being identified for a smaller scale urban extension but object on the basis that the capacity of development should be increased to 2,500 dwellings.	
96	30	I)	SSP9		Part of the 3,000 dwellings to be provided as a small scale urban extension in Wiltshire has already received planning permission at appeal e.g. Moredon Bridge. That site did not consider the cumulative impact and the inspector who determined the appeal was equally not concerned. Further clarification is required on what aspect of cumulative impact should be assessed, if any. Crest require further clarification and accordingly object to criterion I).	

<i>Respondent Ref</i>	<i>Comment No.</i>	<i>Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
96	31	ii)	SSP9		Objections have already been made to CP4 and to other elements of the Core Strategy in respect of the level of affordable housing provision. It is considered that there is no evidence and thus justification for the proposed 35% provision and that 30% is more appropriate as a target figure to be subjected to viability testing. Furthermore, it is considered that reference should be made to the guidance in PPS3 Housing which requires LPAs to demonstrate that the level of affordable housing is viable.	Criterion ii) accordingly needs to be amended.
96	32	iii)	SSP9		Objections are lodged to this criterion on the basis that there is no justification for the provision of a multi modal transport link between north and west Swindon and Swindon Central Area within the WSP Transport Study. The development of Tadpole Farm is likely to be completed (or virtually completed) before the commencement of this multi modal route. Furthermore, the transportation work undertaken by SK Transportation (see Tadpole Farm Evidence base) indicated that this route is not required for the delivery of Tadpole Farm. It would only serve to undermine the sustainable transport strategy that is being proposed as part of the development.	Crest requires reference to this Multi Modal Transport Link to be deleted on the basis that it is not justified.
96	33	iv)	SSP9		Crest has no objections to a contribution towards a new secondary school where it has been demonstrated that this is justified and that the contribution is reasonable and proportionate to the level of development proposed at Tadpole Farm and that the viability of the development is not damaged to the extent that the development could not proceed.	

<i>Respondent Ref</i>	<i>Comment No.</i>	<i>Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
96	34	v)	SSP9		Crest support the provision of public transport links from the first phase of the Tadpole Farm development. The introduction of a rapid bus route from Tadpole Farm to the town centre is a key component of the sustainable transportation strategy for the site. Detailed discussions have taken place with the local bus operators and Highway Department and a route has been agreed. Further details are provided within the Transportation Strategy document prepared by SK Transportation (see Tadpole Farm Evidence Base).	
96	35	vi)	SSP9		Crest have no objection to the provision of a primary school within the Tadpole Farm development. The illustrative Masterplan has made provision within the proposed development to accommodate a primary school. Create however, query the need to provide an additional one form of entry as temporary accommodation to manage the temporary peaks as there is no evidence for this (see illustrative Masterplan).	
96	36	vii)	SSP9		Crest has no objection to the provision of 5ha of employment land within the Tadpole Farm development. However in line with their representations on SSP3 they consider that the definition of employment land should be consistent with the advice in draft PPS4.	
96	37	viii)	SSP9		Crest have no objection to the provision of a neighbourhood centre within the Tadpole Farm urban extension. They fully support the provision of the neighbourhood centre using a traditional 'high street' model.	

<i>Respondent Ref</i>	<i>Comment No.</i>	<i>Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
96	38	ix	SSP9		Crest fully support the objective to provide a sustainable transport strategy for all modes of transport including links through Redhouse and Oakhurst. Crest and their consultant have been working with the Highway Authority, the Highways Agency and Swindon's bus company, and they have agreed a strategy for the Tadpole Farm development.	
96	39	x)	SSP9		Crest support the provision of green infrastructure links throughout the site which not only link the site to Swindon but also to the countryside beyond.	
96	40	xi)	SSP9		Crest have no objection to the provision of a range of formal and informal sport, leisure and recreation areas in accordance with the requirements of their development.	
96	41	xii)	SSP9		Crest have no objection to the provision of landscaping as part of the overall development. However, they do object to this criterion on the basis that it is required to mitigate the visual impact of the development. This is misleading given that one of the justifications for identifying Tadpole Farm was its high landscape capacity to accommodate development. It is contradicting and misleading to identify a site due partly to its capacity to accommodate development and then to require landscaping to mitigate its impact.	There is no justification for this requirement and this criterion should be deleted.
96	42		SSP10		Crest has no objection to the principle of a sustainable urban extension to the west of Swindon in line with the emerging RSS for the South West.	

<i>Respondent Ref</i>	<i>Comment No.</i>	<i>Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
96		43	SSP9		The urban extension to the West of Swindon lies within Wiltshire Council who are not as advanced with their Core Strategy as Swindon Borough Council. Furthermore there is no developer attached to that scheme. Crest has concerns regarding the actual commencement of that urban extension on the delivery of Tadpole Farm. They do not want to have the commencement of Tadpole Farm delayed by reference to the potential cumulative impact which is unknown. However, nowhere is it explained what is mean by the cumulative impact.	The policy should therefore be clarified to explain what is meant by cumulative impact.
96		44	SSP11		Crest has no objection to the principle of this policy which seeks to provide security of housing supply should there be a problem with the delivery of any of the identified sites.	
96		45	SSP11		The Tadpole Farm site is available for development with an experience national developer. They have undertaken considerable background research (see Tadpole Farm Evidence Base) and there are no constraints to the development of the site. Indeed, Crest consider that given the complexity of some of the identified urban extensions that there could be potential problems with delivery.	Crest object to this policy and consider that reference should be made to the provision of the potential for Tadpole Farm to accommodate additional development.

<i>Respondent Ref</i>	<i>Comment No. Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
96	46	DMP1		<p>Crest have no objection in principle to this policy but have particular concerns with regards to targets relating to Energy Assessment, Sustainability Construction and Low/Zero Carbon Energy.</p> <p>Crest consider that there is no justification within the evidence base of the Core Strategy to justify levels above that set out in national guidance. Crest object to any requirement in the Core Strategy which is not in line with national policy.</p>	
96	47	DMP2		<p>Crest consider that any contributions sought must be in line with the advice in Circular 05/2005 'Planning Obligations'. Whilst they recognise that the Circular accepts the use of standard charges and formulae these must be related to local circumstances. Furthermore, it is essential that such changes must be affordable and ensures that development does not become unviable.</p>	<p>With regard to deferred contributions, Crest's preference would be flexibility in the way changing market conditions are addressed. A phase-by-phase approach with separate S106 Agreements for each phase would allow for market conditions current at the time to be reflected in the S106 Agreement. Crest would not want to revisit past consents to analyse actual outcomes against assumed conditions unless the Council are prepared to refund other contributions. The policy and supporting text need to be amended accordingly.</p>
96	48	DMP5		<p>Crest are in agreement that any assessment of Tadpole Farm should provide the elements summarised under DMP5.</p>	

<i>Respondent Ref</i>	<i>Comment No.</i>	<i>Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
96	49	vii)	DMP5		With respect to item vii) contributions towards the design, construction and maintenance of the new/enhanced off-site infrastructure should only be sought in line with the advice contained within Circular 05/2005. Any contributions for new/enhanced infrastructure would need to be necessary, directly related to the development, fairly and reasonable related in scale and kind, and reasonable in all other respects.	The policy should be amended to reflect this advice or SO2. Crest object to this policy until such amendments are made.
96	50		Implementation and Monitoring		Crest support the principle of an Implementation and Monitoring Delivery Plan to ensure that the delivery of development is monitored. They also support the commitment to update it as regularly as required albeit they consider that it should be updated on an annual basis.	
96	51		Implementation and Monitoring		With specific regard to Tadpole Farm, there is no objection to the suggested housing trajectory for the site. Furthermore, it is anticipated that an application will be submitted in 2010. However, within the key infrastructure requirements objections are made to any suggestion that transport links between Purton Road and Great Western Way are required in the form of a contribution to the PR-GWW Link. There is no justification within the WSP Transportation Report for the provision of this Link Road. It should therefore be deleted in line with the representations in SSP9.	
96	52	8.10	SSP9		Crest support the identification of Tadpole Farm as a smaller scale Urban Extension.	

<i>Respondent Ref</i>	<i>Comment No.</i>	<i>Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
96	53	8.10	SSP9		Crest consider that due to the lack of constraints the site can accommodate 2,500 dwellings without any infringement on landscape, education, flood risk or any other consideration. Crest consider that the additional development would not infringe any of the considerations in the Sustainability Appraisal. Indeed it is considered that the increase of development at Tadpole Farm would make for a more sustainable development.	
96	54	8.12	SSP11		Crest have made representations suggesting that Tadpole Farm can accommodate additional development. This would assist the Borough Council to ensure that they have sufficient land to meet their housing requirements. It will also not infringe any statutory environmental constraints. Crest considers that such an alteration would be consistent with the Sustainability Appraisal.	
96	55		SSP3		Crest have no objections to the provision of 5ha of employment land and floorspace within the Tadpole Farm development. Indeed 5ha of employment land has been identified within the Concept Illustrative Masterplan prepared for Crest.	
96	56		SSP3		Crest consider that this policy should make reference to the emerging Government guidance in draft PPS4 'Planning for Prosperous Economies'.	SSP3 should be amended to reflect this advice with regards the range of uses which can contribute to employment and floorspace.

<i>Respondent Ref</i>	<i>Comment No.</i>	<i>Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
96	57		DMP4A		Crest object to this policy in respect of the proposed level of affordable housing sought namely 35%. Objections have already been made in respect of SO4 and CP4 in respect of this issue. There is no justification within the Housing Needs Assessment for this level of affordable housing. In addition reference needs to be made to the advice in PPS3, with regards to the economic considerations of providing affordable housing.	Crest therefore consider that the policy should be amended to more accurately reflect the housing needs identified in the Housing Needs Report as well as a reference to the economic viability considerations.
99	1		DMP1		Support this policy in particular reference to context, character, street scene, public realm, historic environment & distinct character.	
99	2	4.8	DMP8		Support the analysis required to ensure responsive development.	
99	3	4.12	DMP1		Support the design brief / masterplan led development	
99	4	4.14	DMP1		Support Building for Life criteria.	
99	5		DMP6		Support this policy.	
99	6		DMP7		Support the means to protect buildings of historic interest such as public houses and places of worship.	
99	7		DMP8		Welcome recognition of the relationship to cultural heritage, the historic environment, identity sense of place, landscape character and local distinctness.	
99	8		CP8		Supports criteria vii).	
99	9	2.114	CP8		Support the content of paragraph 2.114	
99	10		CP10		Support this Policy.	

<i>Respondent Ref</i>	<i>Comment No.</i>	<i>Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
99	11		CP10A		Support this Policy.	
99	12		SSP4		Welcome the emphasis on urban consolidation and tackling barriers / severance to permeability; recognition of the value of the town's railway heritage and the importance of improved public realm in particular.	
99	13		SO8		The historic environment seems to be an afterthought without any associated indicators.	Create a separate objective for historic environment including indicators such as; the number of historic assets at risk; the completion of Historic Landscape characterisation; % of new developments in accordance with Building for Life criteria; the publication of a local list; the adoption of a Historic Environment SPD; the number of public realm improvements completed; the number of heritage attractions accessible to the public and number of visits.
99	14		DMP2		Reference should be made to the Public Realm Strategy SPD referred to in the Core Documents Library.	
99	15		DMP5		Within paragraph 4.51, great play is made to where "Manual for Streets" won't be applied however not much mention to when it will be applied.	Clarification is required to when "Manual for Streets" will be used to inform development and how it will be applied to assess it.
99	16		DMP6		To be effective might reference be made to the intention to undertake and complete HLC and local list of important historic assets.	This could be achieved through creating an Historic Environment SPD which would be stated as a delivery indicator. The HLC and historic environment could be included in the Glossary.
99	17		SSP7		Fails to fully acknowledge the significance of the historic landscape.	A full analysis of the landscape and thorough investigation of potential below ground archaeology must be undertaken to inform the sites capacity and any development form to satisfy national policy.

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99	18		SSP12 & 14		Need to clarify what is meant by "special characters" and the Core Strategy should determine what evidence has been gathered and / or what will need to be gathered to determine character.	Evidence such as Conservation Area appraisals, Community and Parish Plans and completion of Wiltshire's Historic Landscape Characterisation can help determine character.
99	19		SSP11 d		This is a selective list, however criteria for determining site suitability should be more thorough.	
99	20		Building for Life		Need to clarify whether applications will be refused if they fail to be in accordance with Building for Life criteria.	
99	21		I & M Plan		Should consider the inclusion of specific reference to actions relating to the historic environment including e.g. the number of historic assets at risk.	
99	22		App 2		Selective list of evidence however the Core Document library includes relevant evidence.	Maybe the Core Documents library and the list of evidence in the Core Strategy should be combined and included on the website and signposted where appropriate.
99	23		CP8	Lydiard Country Park	Check the accuracy of the designation of the C18 Lydiard Country Park as appears to extend further west than identified.	No change.
103	106		CP10A	Y	The alignment for the canal on the Proposals Map does not relate to the historic route and thus is not capable of restoration. The safeguard appears to be unviable and unrealistic.	
103	107		SSP8		The policy appears inconsistent between SSP8 xiii) and policy SSP5 and Figure 13. Thus the policy should be revised to address these concerns.	

<i>Respondent Ref</i>	<i>Comment No.</i>	<i>Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
103	108	Figure 16	SSP8		Object to Figure 16 as it should more appropriately be depicted on the Proposals Map. The merits of Figure 16 should be more appropriately explained in the Core Strategy. There is also no reference to Figure 16 in the policy itself.	Figure 16 should be deleted from the Core Strategy.
124	1		SSP7		It is not consistent with national policy – Delivering Sustainable Development (PPS1) – by virtue of the fact that the potential damage to the ecology, to an important literary landscape, to significant archaeological features, to strategic views from the North Wessex Downs AONB & Coate Water Country Park, to Coate Water SSSI and Day House Copse Local Nature Reserve cannot be secured.	<p>Delete wording of SSP7 and replace with:</p> <p>i) Up to 10 hectares of land at Commonhead will be safe-guarded for future expansion of the Great Western Hospital.</p> <p>ii) Land between the hospital, Coate Water Country Park and the motorway is designated for its high landscape value, its special historic and literary quality and its potential ecological value. No development will be permitted</p> <p>iii) Land to the west of Day House Lane will be managed as a wildlife conservation area to add value to Coate Water SSSI, Coate Water Local Nature Reserve, Day Copse Local Nature Reserve and Burderop Woods North Local Nature Reserve.</p>

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124		2	SSP7		The Government's White Paper "Communities in Control: Real Power, Real People" calls for local authorities to involve communities in the decision-making process. Policy SSP7 clearly conflicts with Government when 52,000 people have signed a petition in order to ensure that a 1km buffer of countryside is protected against development east and south of Coate Water Country Park. The council have ignored this.	Delete wording of SSP7 and replace with: i) Up to 10 hectares of land at Commonhead will be safe-guarded for future expansion of the Great Western Hospital. ii) Land between the hospital, Coate Water Country Park and the motorway is designated for its high landscape value, its special historic and literary quality and its potential ecological value. No development will be permitted iii) Land to the west of Day House Lane will be managed as a wildlife conservation area to add value to Coate Water SSSI, Coate Water Local Nature Reserve, Day Copse Local Nature Reserve and Burderop Woods North Local Nature Reserve.
124		3	SSP7		The policy is not justified - plenty of Brownfield alternatives exist to develop housing and employment land to meet government targets for Swindon. The land at Coate is more important to Swindon's future as an area of rural recreation and of high landscape value.	Delete wording of SSP7 and replace with: i) Up to 10 hectares of land at Commonhead will be safe-guarded for future expansion of the Great Western Hospital. ii) Land between the hospital, Coate Water Country Park and the motorway is designated for its high landscape value, its special historic and literary quality and its potential ecological value. No development will be permitted iii) Land to the west of Day House Lane will be managed as a wildlife conservation area to add value to Coate Water SSSI, Coate Water Local Nature Reserve, Day Copse Local Nature Reserve and Burderop Woods North Local Nature Reserve.

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124		4	SSP7		The proposal is inconsistent with the Council's previous commitment to protect this area from inappropriate development once the Great Western Hospital was built.	<p>Delete wording of SSP7 and replace with:</p> <p>i) Up to 10 hectares of land at Commonhead will be safe-guarded for future expansion of the Great Western Hospital.</p> <p>ii) Land between the hospital, Coate Water Country Park and the motorway is designated for its high landscape value, its special historic and literary quality and its potential ecological value. No development will be permitted</p> <p>iii) Land to the west of Day House Lane will be managed as a wildlife conservation area to add value to Coate Water SSSI, Coate Water Local Nature Reserve, Day Copse Local Nature Reserve and Burderop Woods North Local Nature Reserve.</p>
124		5	SSP7		It's not an effective policy. The area is remote from the main urban area of Swindon and cannot be integrated with the town. More land needs to be set aside for the hospital expansion to meet the health needs of a growing town.	<p>Delete wording of SSP7 and replace with:</p> <p>i) Up to 10 hectares of land at Commonhead will be safe-guarded for future expansion of the Great Western Hospital.</p> <p>ii) Land between the hospital, Coate Water Country Park and the motorway is designated for its high landscape value, its special historic and literary quality and its potential ecological value. No development will be permitted</p> <p>iii) Land to the west of Day House Lane will be managed as a wildlife conservation area to add value to Coate Water SSSI, Coate Water Local Nature Reserve, Day Copse Local Nature Reserve and Burderop Woods North Local Nature Reserve.</p>

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200	1		SSP1		We seek deletion of Wroughton as a primary rural settlement in policy SSP1. We do not consider that its status is justified by the evidence base. (Further detail in submission)	Deletion of Wroughton as Primary Rural Settlement in SSP1.
200	2		DMP1		Government guidance seeks to discourage Councils from simply restating national policy. We therefore seek the deletion of sections 10, 11 and 13 of policy DMP1 to avoid this. National policy in this area is still subject to change and the core strategy could find itself at variance with it. A more flexible approach would rely on national policy.	Delete sections 10, 11 and 13 of policy DMP1.

<i>Respondent Ref</i>	<i>Comment No. Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
200	3	DMP4A		Provision of 35% affordable housing not justified by evidence base. Core Strategy should require no more than 30% affordable housing in line with Strategy Housing Market Assessment. Council has not demonstrated viability as required. Policy needs to allow for public subsidy which we submit requires removal of the requirement for housing to remain affordable in perpetuity.	<p>Propose amended wording:</p> <p>A. Provision shall be made for affordable accommodation as required by the following criteria.</p> <p>i) on all developments comprising of 15 or more residential units, or on sites larger than 0.5 hectares provision shall be made for 30% of the units to be affordable (subject to viability testing) unless it can be demonstrated that this will render the scheme unviable.</p> <p>ii) in order to demonstrate that a scheme is not viable an applicant will need to submit financial appraisals to the Council and be prepared for them to be subject to independent financial appraisal.</p> <p>iii) integration into the development layout will be required in accordance with Council requirements, unless in exceptional circumstances where the practicalities of doing so would compromise its delivery, in which instance an off site contribution in lieu of onsite delivery would be sought.</p> <p>iv) a dwelling breakdown and mix will be required that reflects the current needs of the borough.</p> <p>B. Where affordable accommodation is to be provided a legal agreement will be required to ensure that the units:</p> <p>i) are managed in accordance with the Council's standards.</p> <p>ii) are deigned and constructed in accordance with the Council's requirements.</p>

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200	4	3.87	SSP12		To demonstrate deliverability, paragraph 3.87 should make it explicit that residential allocations of some scale are justified at Highworth in keeping with its status as a primary rural settlement, and suitable sites exist. This will help to manage expectations on the future of a town more explicitly than a reference in SSP1. This is strategic guidance which properly belongs in the Core Strategy.	Add the following words to 3.87: The town will be the main location for housing to serve the needs of the rural part of the Borough.
224	1		SSP8		The draft EDA SPD and the Swindon EDA Framework report prepared by LDA Design have not been included in the Core Strategy evidence base. Thus there is no justification for the scale of development and urban form proposed in Figure 16.	In order to make the Core Strategy sound, the EDA SPD should be included in the evidence base for the Core Strategy so that it can be examined as part of the Core Strategy examination.
224	2	4	SSP8		Wan borough PC are concerned that the proposals set out in the EDA SPD are unsound. It is our belief that the EDA requires the detailed policy and soundness review of an Area Action Plan (AAP)	In order to make the Core Strategy sound, para 3.69 sentence two should be changed to SBC will therefore prepare an AAP for the EDA
224	3		SSP8		Many residents and Wanborough PC have objected to the scale of development and urban form of the EDA proposal. The results of these objections should have been considered by SBC and any changes incorporated into Fig16 before it is included in the Core Strategy. Furthermore, the results of the consultation into the EDA SPD will not be incorporated until a further draft of the document is made available in 2010. This is too late to be considered by the Core Strategy.	To make the Core Strategy sound, Figure 16 should be changed to incorporate submissions made by the local community into the EDA SPD.

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224		4	SSP8		In the absence of any justification within the evidence base, there is no credible justification for the scale and urban form of the EDA. The development area will span across large areas of flood plain which will fragment the development leading to separation and unsustainable pockets of development.	
224		5	SSP8		The EDA abuts and surrounds a number of key transport routes. There is no evidence base provided as to how this infrastructure will be strengthened and enhanced in order to facilitate trips to and from the EDA. During consultation on the EDA SPD concerns were raised with the lack of transport infrastructure planning within the document. The Core Strategy does not provide enough detail about transport infrastructure requirements.	To make the Core Strategy sound, Section B xiv) must contain greater detail as to the transport infrastructure required, the timing for the delivery of this infrastructure, where the funding will be provided and who will have responsibility for constructing this infrastructure.
224		6	SSP8		The EDA is not an appropriate strategy when compared against reasonable alternatives given the impact of the flood plain on the urban form and the lack of consideration given to the service and transport infrastructure requirements. The scale of development should be reduced in order to provide a more sustainable urban form and a more deliverable package that will not compromise the delivery of affordable housing due to viability considerations	Justification for the scale of development and the urban form should be added to the evidence base. In the absence of evidence the scale of development should be reduced to reflect the impact of the flood plain and the transport infrastructure requirements generated by the development. Development around the flood plain should be eliminated to ensure that the EDA, in a reduced form, can be delivered. This will deliver a more sustainable community based upon a transport hierarchy centered on public transport and walkable neighbourhoods.

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224		7	SSP8		SSP8 does not adequately identify the infrastructure requirements of the EDA proposal. The urban form expressed in Fig16 cannot support sustainable urban design with walkable neighbourhoods, internalisation of journeys and promoting a hierarchy of transport choices with public transport, walking and cycling. Thus the surrounding road infrastructure will be subject to higher trips from the EDA.	The infrastructure requirements generated by the fragmented urbanism, surrounded by flood plain need to be better understood and reflected in the policy of SSP8.
224		8	SSP8		A 'sift method' of urban design has been utilised. This produces fragmented pockets of separate, unsustainable communities. This process cannot deliver sustainable development and will result in car based urban sprawl.	The infrastructure requirements generated by the fragmented urbanism, surrounded by flood plain need to be better understood and reflected in the policy of SSP8.
224		9	SSP8		The servicing of the EDA will be substantially more expensive than other, more sustainable locations which have not been included in the Core Strategy. This infrastructure cost will put at risk the delivery of the EDA and compromise the community elements of the Planning Agreement such as affordable housing and community facilities.	The infrastructure requirements generated by the fragmented urbanism, surrounded by flood plain need to be better understood and reflected in the policy of SSP8.
224		10	SSP8		The Core Strategy does not adequately reflect the delivery timescales for implementation.	To make the Core Strategy sound, the infrastructure requirements generated by the fragmented urbanism, surrounded by flood plain need to be reflected in the Core Strategy

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224	11	4	SSP8		It is not clear who is going to deliver the required infrastructure. The Core Strategy states at para 3.71 that 'there are high cost infrastructure items that the existing policy would not generate enough funds to deliver'. Without these funds, the EDA cannot be serviced and is therefore undeliverable. We have been assured by SBC that without available infrastructure funding that development will not proceed.	To make the Core Strategy sound, the infrastructure requirements of the EDA needs to be assessed, costed and agreed with the promoters of the site. Any shortfall in funding should be specified and the sources of additional funding identified. Without thus funding certainty there is a risk of a detrimental impact on surrounding communities if infrastructure is not provided at the appropriate stage of development or the EDA is not able to be implemented due to a shortage of third party funding (such as Government agencies).
224	12		SSP8		There is no defined strategy within the Core Strategy or accompanying documents, including the Transport Plan, which adequately shows how the village of Wanborough will be protected from 'rat running' as a result of a development of 12,000 homes.	
224	13		SSP8		The PC believes that the Core Strategy is unsound as per the definitions set out in PPS12 in regards to SSP8. The EDA is unsound as it is not justified and not effective.	
238	1		Spatial Vision		We support the Council's vision for the Borough. It is considered important to aspire towards achieving a sustainable Borough where communities are cohesive, safe and healthy and residents enjoy a quality of life that does not use more resources than the environment can provide.	

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238		2	SSP12		In order to achieve its vision it is important for the Council to recognise the role the major development areas will play in achieving it's objectives and the positive effect this scale of development could have on rural villages within close proximity. It is important that the balance between housing, employment opportunities, and services and facilities is achieved so as not to encourage unsustainable travel patterns.	
238		3	Strategic Objectives		We broadly support the Council's Strategic Objectives. It should be noted that the successful delivery of development will play an important role in helping to realise these objectives. Each of the objectives are intrinsically linked and it is important to ensure a balance is struck through the quantum, type and phasing of future development.	
238		4	SO4		We support the principle of ensuring that a range of housing types and densities is provided within the Borough.	
238		5	CP4		In order to achieve the Government's housing objective it is important that a range of housing types and densities are provided, in areas where people want to live, not only in urban locations but also in rural areas (as identified in PPS3).	This should be reflected in SO4.

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CP4

If house building levels are low, this will constrain the amount of affordable housing provision with a resultant failure to meet existing housing need. This will result in an increasing incidence of persons requiring affordable housing. The Core Strategy will therefore need to ensure that an adequate quantum of housing is planned for in overall terms and that the housing land supply is both flexible and responsive to ensure deliverability. It should also adopt an approach to the provision of affordable housing that does not prejudice the overall delivery of housing sites, or else the circumstances described will again prevail with a worsening of the affordable housing need contrary to the underlining objective.

238

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SO7

The Core Strategy should ensure that employment opportunities, services and facilities are highly accessible from proposed residential development. There are rural settlements (such as Wanborough) which are located in close proximity to major areas of proposed employment land which could accommodate a modest level of sustainable residential development, and in doing so reducing the current trend of unsustainable travel plans. Development at Wanborough could provide financial contributions to develop sustainable transport links with the proposed employment land.

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238		8	SSP1		In the determination of the hierarchy of rural settlements, the Council has based the analysis of the role and function of the eight settlements at the beginning of the Plan Period and therefore it mirrors the hierarchy adopted in the existing Development Plan (Policy DS5). The analysis has failed to appreciate the enhanced role and function some settlements will be afforded in the context of the major expansion to Swindon. As such it is contested that the evidence base underpinning the Core Strategy is not fully robust, and the Draft Submission is not reasonably flexible to deal with changing circumstance.	
238		9	SSP1		Due to the fact that Wanborough has (in addition to the facilities in Appendix 10) a B1 office development (Contact House), a Level 1 bus service; a 25ha employment land allocation located in close proximity; provision for a secondary school to be built in close proximity, and a wide range of new community infrastructure (as part of the EDA), we would consider that Wanborough has a role and function commensurate to that of a Primary Rural Settlement. Categorising Wanborough as a Secondary Settlement in the Core Strategy as it is currently written is unsound; it is not founded on a robust Evidence Base as it fails to recognise the function the settlement plays to its hinterland.	

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238		10	SSP1		As outlined in the RSS the role and function of settlements are a key policy consideration in determining the scale and location of development. However, development opportunities within and surrounding a town should be an additional consideration as identified within para 38 of PPS3.	
238		11	SSP12		<p>The prospects of expanding the towns of Highworth and Wroughton are limited due to the attractive countryside surrounding them. Growth at Wanborough is constrained to the south due to proximity with the North Wessex Downs AONB and to the north and west to prevent coalescence and protect public open space, there remains the opportunity for the modest expansion of Wanborough to the south east. Development opportunities in this location are eminently suitable to accommodate residential development, provide an element of affordable housing in a rural location and contribute to meeting the housing requirement for the remainder of the Borough.</p> <p>Land south of Badgers Close, Wanborough would not result in a detrimental visual impact or cause undue harm to the Landscape Character Area. This land is also in close proximity of the EDA, which will further enhance the range of services and facilities including employment land, a district centre and secondary schools.</p>	

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238		12	SSP12		The Primary and Secondary Rural Settlement Policy has adopted the same settlement hierarchy as contained within the existing Development Plan. The settlement analysis ignores the proximity to both existing and proposed strategic development sites, which will have an impact on travel patterns, the role and function of existing settlements and their proximity to new facilities and services. The Core Strategy is not founded on a credible evidence base and should be found unsound.	
238		13	SSP12		Once developed opportunities are considered within the settlement analysis alongside the impact of the EDA, it is considered that Wanborough has a role and function commensurate with that of a Primary Rural Settlement.	
239		1	Spatial Vision		We broadly agree with the spatial vision set out within the document, and our comments intend to make a fundamentally sound plan sounder.	
239		2	Spatial Vision		The spatial vision would be significantly strengthened if reference was made to the town's regional role and the specific opportunities presented by an urban extension to the East of Swindon. The vision is the place for this, the EDA is expected to deliver a third of Swindon's growth, and would also reflect the potential of the EDA to improve the performance of Swindon and deliver sustainable growth. This adjustment would ensure that Swindon's status as a sustainable and self-contained location is reflected and would allow us to fully support the Spatial Vision.	The spatial vision would be significantly strengthened if reference was made to the town's regional role and the specific opportunities presented by an urban extension to the East of Swindon.

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239		3	Spatial Vision		More time needs to be spent at the Spatial Vision stage of the plan, particularly on the strategic context that Swindon sits within. Delivery of modern development in and around the town will itself lead to and contribute to sustainable growth. This needs to meet design and performance tests, but it also needs to be timely to meet social and economic objectives (and ensure that less desirable outcomes take place).	A greater emphasis on this important and strategic objective needs to be made in the Core Strategy and then needs to feed the other policies it contains.
239		4	SO1		The objective to exceed international CO2 targets needs to be tempered or balanced against meeting other important growth objectives (which by association or implication will lead to more sustainable outcomes).	
239		5	SO3		The economic growth that the Core Strategy wishes to achieve rests significantly on a housing-led growth strategy.	As a result, housing completions should feature within the monitoring indicators proposed for SO3.
239		6	SO4		We agree that a well designed, balanced mix of housing should be provided at a range of densities.	
239		7	SO4			The first line should be changed to reflect the objective to meet housing requirements, rather than needs which have a different planning meaning. We also believe that the key role of sustainable urban extensions should be explicitly acknowledged here and its successful delivery should be included within the monitoring indicators.

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239		8	SO4		We agree that the number of affordable houses should be used as a monitoring indicator. However, to make the strategy more durable, the definition of affordable housing should be expanded to include social rented housing and intermediate housing, and low-cost for sale. The key matter for Swindon is housing delivery, which in itself will trigger the provision of affordable housing according to any definition. It follows that by increasing and accelerating supply, problems of affordability should and will be eased.	To make the strategy more durable, the definition of affordable housing should be expanded to include social rented housing and intermediate housing, and low-cost for sale.
239		9	SO5		Enhance education provision is an objective that we have consistently supported throughout the evolution of the Core Strategy. We particularly welcome the emphasis on tertiary education and continue to argue that the objective of improving higher education facilities in the town should be underpinned by the provision of a new University located within the urban area.	
239		10	SO10		We support the objective of improving the network of open spaces across the Borough and ensuring that there is a range of safe and accessible environmental and recreational assets in both urban and rural areas. This will add amenity, aesthetic and ecological value to the Borough.	
239		11	CP1		As currently described, CP1 does little more than commit the Council to plan well.	This policy would be much better if it emphasised what was really important for the town - any list must recognise the importance of accelerating the delivery of growth rates and targets that have been confirmed as sustainable by the examination of the RSS.

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239		12	CP1		It is vital that the development of the EDA is commenced as early as possible (alongside the development of brownfield sites) to ensure that the level of housing that is to be developed within the EDA can be completed within the plan period. This too should also feature as a priority in any policy claiming to address issues of sustainability.	
239		13	CP4		We see regional targets very much as minimum requirements. This follows our preference for more flexibility in policy, simply because too much precision can, in some place or circumstances, 'undo' the very thing that a plan or strategy is trying to achieve.	Specific targets for both density and affordability should be excluded from the Strategy's policy or for determination on a project by project basis. The text may be a good place to describe current targets if they are required (and there may be a case for phasing these to reflect changing objectives over the course of the plan).
239		14	CP7			Whilst Rapid Transit might be a laudable aspiration, it should not feature in policy.
239		15	CP9		We recommend that DPDs are not used to allocate sites for community use (as set out in Point A). Requirements can change quickly from service providers as I am sure the Council will be aware. The better approach is to provide positive policy for health and community provision which will encourage providers to address key issues and needs in appropriate locations.	
239		16	CP10		We feel that this policy could be better achieved through other policies controlling the loss of existing spaces and through the development management and control process for the creation of new spaces.	Figure 7 should be removed from the strategy.

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239		17	CP10A		Reinstating or restoring canals is a very expensive business and protecting a route for which there is no funding in place and no overriding national need, fails the tests of proper policy and is not warranted.	We recommend that this policy is deleted, or at the very least that the route and the commitment to safeguard it is removed from it.
239		18	SSP1			The presumption in favour of development should be extended to the EDA too, simply because this is so essential to the delivery of the growth required in and around Swindon. The alternative would be to adjust the definition and depiction of the urban area boundary to follow the outer limit of the EDA. Presumption in favour of development progressing must apply explicitly to the EDA.
239		19	SSP2			To reflect the importance of development sources included in the table, we recommend that some form of priority or sequence is given to the scheme it includes. It is recognised that the Council want to put the central and existing urban areas at the top of the list. However, beyond that the EDA should come first because of the overall contribution it can make and in recognition of the need and clear potential to get development at the EDA started quickly.
239		20	SSP8		The plan as a whole would be strengthened by allowing more homes within the EDA. The area is capable of accommodating more than 12,000 new homes and allowing a higher number of homes within the urban extension would reduce the need for the release of less sustainable sites elsewhere in the Borough.	SSP8 should be amended to allow for a higher number of homes to be accommodated.

<i>Respondent Ref</i>	<i>Comment No.</i>	<i>Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
239	21		SSP8		The policy and the level of detail it contains is far too long and is much too prescriptive.	Like the other urban extensions it can and should be governed by the other policies of the plan, and on this basis, a lot can be removed.
239	22		SSP8		Like the other growth areas, affordable housing will be built in the EDA under the terms of other policies in the strategy (and particularly CP4). This will allow a mix of affordable housing to be delivered including social rented accommodation and low-cost home ownership, subject to particular needs and circumstances. Similar comments apply to density. This can come through other policies.	Part B (I) and B (ix)-(xiii) should be deleted.
239	23		SSP8			Section C should be deleted. This is for other development management mechanisms.

<i>Respondent Ref</i>	<i>Comment No. Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
239	24	SSP8		Section D makes a lot of sense. We agree that it is vital that a realistic strategy should be put in place that will allow the EDA to come forward as quickly as possible. We therefore support the idea of preparing a SPD in relation to the EDA. However, this is on the basis that SPD will help to achieve the early delivery of housing to realise the growth strategy. With regard to the separate tariff arrangement for the EDA, we believe that this could be a mechanism which could assist in the delivery of the major infrastructure. However, there should be extensive consultation involving developers and other key stakeholders in the area prior to any such tariff being introduced. Any tariff needs to clearly recognise the pressures on development to meet multiple objectives and the benefits this development and activity triggers. It also needs to be very clearly linked to the EDA and the other sources of funding available - especially the New Growth Point Fund which we understand the Council is already pursuing.	
239	25	SSP8	Figure 16	Figure 16 needs to be much simpler to allow for the circumstances and principles that will apply at the EDA, initially and over time. There is no need to establish development blocks which introduce too much precision (and which are found nowhere else in the plan) or to limit the form of development at this stage or in this document. The plan also makes the EDA look very dispersed.	

<i>Respondent Ref</i>	<i>Comment No.</i>	<i>Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
239		26	SSP8			The rapid and sustainable growth (mentioned at the end of the text and the policy) is an established regional and national policy and should feature at an early stage in any policy for the EDA and run throughout it. The requirement should also inform any phasing plan that is produced for the area or which is recommended in the strategy (that we note is missing at the moment).
239		27	SSP10		We recognise that this policy is introduced because of the provisions of the RSS. However, we recommend that the concerns it acknowledges (especially in clause 1) by ensuring that the Wiltshire extension does not prejudice any of the other developments proposed in the plan let alone the "later" ones currently referred to.	
239		28	SSP11		This type of policy should simply not exist. It indicates a lack of confidence in the development strategy that is wholly unwarranted. It will trigger uncertainty and could undermine what the plan is trying to achieve. The EDA should not be artificially limited to 12,000 dwellings - the figure should either be treated as an "at least" minimum or a range that truly reflects the potential of the area should be introduced. If there is doubt anywhere else then this can be tested through the Core Strategy process and sites can be removed and/or replaced. There is therefore no need and no place for this type of policy in a modern forward looking plan.	

<i>Respondent Ref</i>	<i>Comment No. Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
239	29	DMP1		We question the prospects of this policy's successful deployment and worry about its general operation. The final two parts (11 and 12) include inflexible standards that new development is expected to meet regardless of circumstances, cost or conditions.	This either needs to be tempered or removed from the policy (and included elsewhere or left to other regimes).
239	30	DMP1A		Risk needs to be more accurately measured and more precisely defined at each stage of the development process. As a result a policy which expressly precludes development from areas which may be a subsequently proven not to be at risk later, or which would lead to a better overall situation through management should not be included or should be adjusted to include flexibility. This need is demonstrated in the Core Strategy which includes a constraint on a plan which is acknowledges is indicative.	Risk needs to be more accurately measured and more precisely defined at each stage of the development process.

<i>Respondent Ref</i>	<i>Comment No. Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
239	31	DMP2		<p>We believe that the scale of development proposed for the EDA warrants an explicit acknowledgement within the Core Strategy that public subsidy may be required in order to ensure that the necessary infrastructure is in place. The proposed separate tariff arrangement for the EDA could be a useful tool in assisting delivery of infrastructure, however we strongly welcome the statement that where developers face abnormal costs and paying such a tariff would seriously threaten the viability of a development the Council will be prepared to consider requests for a reduction subject to an 'open book' approach being adopted. This is particularly important given current economic conditions. This also points to a recognition of the need for obligations to be properly phased with development to ensure that a basic desire for obligation does not frustrate the delivery of much needed housing and economic growth.</p>	

<i>Respondent Ref</i>	<i>Comment No.</i>	<i>Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
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DMP4A

The proposed requirement that 35% affordable units on development sites comprising 15 units or more that are larger than 0.5 ha is overly cumbersome and could threaten the viability of development. The key issue in relation to housing affordability is one of supply and demand and it is of utmost importance that the right balance is struck between ensuring an appropriate proportion of homes are 'affordable' and making sure that the policy regime does not place unrealistic demands on developers that will reduce the overall supply of new housing being built and further exacerbate existing problems of affordability. It is essential that the affordable housing requirement is not set at such a high level that it slows down the supply of new housing coming forward within the EDA.

239

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DMP5

We agree that the growth of Swindon will result in increased trip generation and that it is important that this increase is managed through the provision of appropriate new infrastructure and through improvements to existing infrastructure. It is entirely appropriate that development should contribute towards the cost of infrastructure provision where it can. We also agree that Transportation Assessments and Travel Plans will play an important role in identifying the transport infrastructure requirements arising from new development.

<i>Respondent Ref</i>	<i>Comment No. Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
239	34	DMP5		In relation to the off-site impact of development on the transport network and the expectation that developers should make a contribution towards wider transport network improvements, we would argue that any such contribution should be reasonable and that the overall viability of schemes should not be jeopardised. With respect to large scale development requiring phased construction, such as the EDA, we agree that newly constructed properties should be protected from the noise and disruption caused by construction traffic and are happy to work alongside the LPA to ensure that the phasing of development is carried out in a sensible manner that minimises adverse impacts.	
239	35	General			The emphasis at an earlier stage of the regional context behind the strategy should inform a greater sense of urgency and encouragement to new growth and development. This could also lead to a set of phased objectives being introduced to the plan, which could see priority in the first five years or stage of this plan on the meaningful commencement of development (or acceleration of this). The absence of a phasing policy (either on general objectives and strategy or on delivery) in a plan that lasts for 20 years is a basic flaw.

<i>Respondent Ref</i>	<i>Comment No.</i>	<i>Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
239	36		General			The number of obstacles and policy hurdles should be reduced through a more contemporary response to development economics and the wider benefits that economic development can trigger. This should inform a better balance to the decision making process - at the moment the merits of development are not recognised, just the costs, impacts and negative implications. This should run through the plan.
240	1	1.1	Spatial Vision		USS is supportive of the Core Strategy vision.	
240	2		DMP3		USS support the principles of this policy.	
240	3		CP3		USS wishes to reiterate that the Council maintains this level of flexibility (broad range of employment) through the Core Strategy, in order to help diversify the economy, regenerate areas and attract business to existing employment areas.	
240	4		SSP6, SSP7 & SSP8		USS agrees with the three proposed allocations for employment land growth at EDA, Commonhead and Tadpole Farm.	
240	5		SSP7, SSP8 & SSP9		USS wishes to reiterate that the Council should encourage and consider favourably proposals to regenerate or modernise existing employment sites, especially where their future use will contribute to the achievement of the Borough's economic growth.	The Council should encourage and consider favourably proposals to regenerate or modernise existing employment sites, especially where their future use will contribute to the achievement of the Borough's economic growth.
240	6		DMP1		USS supports the proposals for a mandatory 'Swindon Standard' for all new development.	

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240	7		DMP1		USS encourage the Council to adopt flexible requirements to ensure that the feasibility of potential development is not impacted detrimentally by any specific aspirations as part of the 'Swindon Standard'	USS encourage the Council to adopt flexible requirements to ensure that the feasibility of potential development is not hindered by any specific aspirations as part of the 'Swindon Standard'
241	1		CP3/SSP3		Would contend that in order to promote the self containment, vibrancy and sustainability of the primary settlements, there will be a requirement to compliment additional housing growth with additional employment development. In its current form the Core Strategy, and in particular policies CP3, SSP3 and SSP12 fails to demonstrate sufficient flexibility in relation to the possibility of additional employment development either within or on the edge of the primary rural settlements, including Highworth. PPS7 is clear that there is a requirement for LPA's to encourage and facilitate new economic development in the rural areas and this requirement should form an inherent part of the Core Strategy for the Borough.	
241	2		SSP3		SSP3 places too great a reliance on new employment land coming forward at three urban extensions, which due to extensive and costly infrastructure requirements, may not become available until towards the end of the plan period.	
241	3	3.87	SSP12		Concern that the Core Strategy places too great a reliance upon intensification of uses at the existing Blackworth Industrial Estate to create additional jobs at Highworth. The estate is now dominated by TS Tech (Approx 50%), the town's largest employer, leaving little choice or flexibility for new or start up businesses to locate there.	

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241		4	CP3/SSP12		Highworth has experienced the loss of in excess of 2.3 ha of employment land in recent years and no new sites have been allocated to accommodate this loss. It is contended that there is now a significant shortfall of employment land to meet the immediate population of Highworth which only serves to encourage the 'dormitory status' of the town.	In line with the RSS and PPS7 there should be a clear objective of the Core Strategy to deliver additional employment development at Highworth. Suggest the addition of the following wording to CP3: "At the primary settlements of Wroughton and Highworth development proposals for new or expanded employment uses, either within or on the edge of the settlement, will be provided the development does not by virtue of its scale form and character result in an adverse impact on the settlement and the surrounding countryside, and the development is appropriate in relation to the availability of existing and proposed services in the settlement."

<i>Respondent Ref</i>	<i>Comment No.</i>	<i>Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
242		0	SSP2		<p>Highworth is identified as a 'primary rural settlement' in Policy SSP1, however no additional residential development in the form of an urban extension is being proposed. The Strategy is inconsistent as it acknowledges the policy status of the town, yet fails to provide any additional housing.</p> <p>Highworth is an important primary rural settlement which requires additional housing to sustain the local community, its social and physical infrastructure and to ensure a sustainable future. These matters are all identified within the Highworth Community Partnership Group (HCPG's document entitled "Highworth The Vision". Highworth's town centre is experiencing economic decline, and additional housing offers the opportunity to reinforce the local economy through bringing about investment and potentially linked town centre improvements through Section 106 agreements.</p> <p>The Core Strategy will not be effective as the lack of specific housing provision will prevent Highworth from sustaining the necessary social (and other) infrastructure needed to sustain the community and secure investment. The HCPG's document deserves greater consideration.</p> <p>The reliance on a pattern (SSP2) of major housing sites which face major infrastructure provision in order to be developed satisfactorily (in particular the EDA) is unlikely to achieve the completion rates sought within the Plan Period. The distribution of housing needs to take greater advantage of the opportunities for modest urban</p>	<p>It is recommended that SSP2 be amended to include the provision for specific housing requirement for Highworth of about 350 dwellings in the form of an urban extension (with ample public open space and landscaping) to the south of the town in combination with a new approach to directing planning obligations towards much-needed town centre improvements</p>

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					extensions to the primary rural settlements, which are less reliant on new major infrastructure.	
270	1		General		Publicity for consultation was biased toward the later production stages, not consistent with the Statement of Community Involvement which states that "to achieve effective consultation the Borough Council's aims are to seek early and ongoing involvement in project/policy making discussions."	None proposed.
270	2		General		I do not consider the Core Strategy sound because it is not justified, effective or consistent with national policy.	See other comments.
270	3		SO8		SO8 (page 18). Monitoring indicators do not cover "Growth at Swindon will have occurred in a way that respects and enhances its historic environment"	Add an indicator of number of listed structure derelict or out of use.
270	4	2.16	CP2		The "economic viability" test for whether contributions or public funds are used for infrastructure will only be effective if non-availability of public funds is accepted as grounds for refusing planning permission for a development.	Add statement that if economic viability does not allow sufficient developer contributions to infrastructure and public funds are not available, then development will not be allowed to go ahead.
270	5	2.38	CP3E		55 hectares of employment land to be identified in the urban extensions to Swindon. However, the Development Management policy on Key Employment Areas (DMP3) has no provisions to ensure that these 55 hectares will be identified and delivered.	Add specific mention of identifying new Key Employment Areas in the urban extensions to DMP3.
270	6	2.97	CP7		Para 2.97 (p44) refers to current park and ride services - there are none.	

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270	7	3.33	SSP4		Part 3 - Spatial Strategy. Commercial demand for redevelopment of Hawksworth Industrial Estate as an Innovation Park or other "way that offers a direct synergy with the University" has not been demonstrated by supporting evidence.	Add statement that whilst such development is an aspiration, this strategy should not be used as an obstacle to other B1/B2 uses in Hawksworth Industrial Estate.
270	8	3.58	SSP7		(The policy) takes account of the concerns about protecting the environment surrounding Coate Water (as evidenced by recent planning appeal)	None.
270	9		SSP9		Para viii (p92) Tadpole lane has been singled out without evidence for having a neighbourhood centre using a traditional "high street" model.	The reason for this restriction needs to be justified or the restriction removed.
270	10		SSP10		(The policy is) based on analysis presented during earlier production stages and consistent with draft RSS	None
270	11		DMP4		DMP4B vii. The double negative implies that subdivision will be supported where it involves original dwellings with an area of less than 100m ² .	Remove "not" before "less than 100m ² "
270	12		DMP7		A (iii). May prevent the development of community facilities where economic viability is marginal and affordable sites are not co-located.	Make co-location of facilities a preference rather than a requirement.
270	13		DMP8		A5. "Design and deliver GI in an integrated way". The meaning of this is not clear and no advantages of integrated delivery over non-integrated delivery have been stated.	Remove clause.
270	14		DMP9		DMP9 A vi. Double negative in clause implies site can accommodate non-residential uses that would cause adverse impact on neighbours.	Delete "not" before "cause".

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274	1	3.88	SSP12		Note that whilst Wroughton is still identified as a primary rural settlement the range of services are now considered to be 'narrow' with a 'limited employment base'. This implies that some survey work has been undertaken but the document does not explicitly explain this shift. Secondly this arbitrary 'downgrading' is being used to justify the continued restraints on development.	
274	2	3.89	SSP12		The issue of coalescence with the Swindon urban area remains greatly overstated, the M4 motorway forms a permanent and effective physical barrier which renders coalescence as totally unrealistic. This is supported by the Council's own Strategic Housing Land Availability Assessment report which describes the M4 as a 'definable and defensible barrier that will restrict the merger of the two settlements'.	
274	3	3.91	SSP12		Note that the draft spatial strategy now recognises that sustainable small-scale limited developments that are necessary to maintain the function of rural life in villages will be acceptable under prescribed circumstances. Mildly encouraged by this revised policy stance and particularly by the statement that such development will not be restricted to infill sites within the existing built-up area.	

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274	4	3.91	SSP12		<p>The widening of the criteria for acceptable development needs to be complemented by an equally pragmatic and positive review of settlement boundaries as part of the subsequent Site Allocations DPD, and seek to identify redefined boundaries which would allow sustainable extensions without undue harm to the character of the settlement concerned or the wider landscape.</p> <p>Clients land at Wroughton (Belmont Farm) represents a suitable opportunity for a housing scheme that would include an element of affordable housing which is an overriding importance to the sustainability of rural communities.</p>	
279	1		General		<p>Our clients are generally supportive of the Council's approach towards the rural areas, and consider that the strategy will deliver a more sustainable rural economy, especially in the secondary settlements.</p>	
279	2	3.102	SSP14		<p>Our clients supports the protection of the countryside from 'development that is inappropriate in scale, design or function' (as in SSP14); however the prevention of 'inappropriate (such as urbanised) uses that are not rural in scale, design of function' (as in Para 3.102) does not have the same meaning.</p>	<p>This sentence should be amended to provide a more meaningful explanation of what the Council considers to be 'development that is inappropriate in scale, design or function'. The Council's justification for the policy should adopt a more positive approach towards development in the countryside, in accordance with the overarching strategy for the rural areas.</p>

<i>Respondent Ref</i>	<i>Comment No. Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
279	3	SSP14		The Council does not adequately consider the re-use of buildings in the countryside. SSP14 does not provide flexibility where an employment use cannot be found, for example when there is no market demand. Rural buildings that are no longer suitable for their current use may be abandoned because the Core Strategy does not provide enough flexibility for alternative uses, such as open market housing.	The Council should be more flexible in its approach to the re-use of rural buildings.
284	1	SSP6		There should be no specific policy for Wichelstowe. It should be treated the same as the NDA which has already gained planning permission. Yet other sites for which planning permission has been granted and construction is taking place do not have specific policies. SBC needs to be consistent in its approach.	Policy SSP6 and accompanying paragraphs 3.55-3.56 should be deleted.
284	2	SSP6		The policy requirements do not reflect the extant planning permission that exists for the site and the fact that it is currently being implemented.	Policy SSP6 and accompanying paragraphs 3.55-3.56 should be deleted.

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284	3	SSP6		<p>Paragraph 3.55 "There is the prospect of a new development partnership for the area and possible revisions to the agreed Master Plan and a new outline planning permission..."</p> <p>The Council has not planned for the dwellings required by the RSS.</p> <p>There is no need for a new outline planning permission - this would be accompanied by an Environmental Statement which may have far reaching implications for housing, employment land quantum's and the timing of delivery.</p>	Policy SSP6 and accompanying paragraphs 3.55-3.56 should be deleted.
284	4	SSP6		<p>There is no Design Coded Master Plan for the western part of the site. Condition 3 of the planning permission requires further submission of Design Codes - to date the only approved Design Code approved relates to East Wichel where construction is well under way and at least 580 dwellings have reserve matters approval.</p>	Policy SSP6 and accompanying paragraphs 3.55-3.56 should be deleted.
284	5	Implementation & Monitoring Plan		<p>Objecting to the section on 'Infrastructure Needs by Development Area' in respect of Wichelstowe.</p> <p>Do not agree with the identified housing trajectory for Wichelstowe. It is unrealistic to believe that building on the Borough Council land will be delivering 450-500 houses per annum by 2012, given there appears to be no clear strategy for bringing for implementing the remainder of the site.</p>	A more accurate trajectory in the short term would be 100 2008/09; 215 2009/10; 300 2010/11; 300 2011/12

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284		6	Implementation & Monitoring Plan		The housing trajectory table accompanying Wichelstowe Infrastructure delivery identifies that the road link will not be delivered until 2018/19 - 2020/21 when at least 3,830 dwellings will have been completed. This is contrary to the outline planning permission which conditioned that no more than 1000 dwellings could be built and occupied before the road infrastructure is in place.	The Implementation and Monitoring Plan in respect of the Wichelstowe entry should be amended to reflect the planning permission.
284		7	SSP10		In accordance with Circular 05/2005, paras B10,B30, B33 key development requirements in terms of infrastructure, particularly those requiring contributions, must be sought through negotiations.	Proposals for development at urban extension(s)to Swindon in Wiltshire should:..... Such contributions as may be appropriate will be sought through negotiation with developers.
284		8	Proposals Map	Urban Area boundary	There is no justification given for the urban area boundary as defined. It does not appear to be the adopted Local Plan boundary, but a hybrid. Examination of a document entitled "Local Development Frameworks: Examining Development Plan Documents: Learning from Experience" September 2009 indicates that the Proposals Map accompanying the Core Strategy should show how the adopted Map will be changed, whether this be an addition or a deletion. There is also a need for reconsideration due to the removal of policy ENV13.	
284		9	SSP2		There is no evidence in the Strategy or the evidence base as contained in the SHLAA, that the non-strategic housing land for 6,700 dwellings to be identified at Swindon through the Site Specific Allocations DPD is able to be fully accommodated within the urban area boundary as defined.	

<i>Respondent Ref</i>	<i>Comment No. Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
284	10	Proposals Map	Wichelstowe Boundary	The urban area boundary at Wichelstowe as currently defined does not correspond to the permitted site boundary - it omits part of the urban country park and the major road junction accessing the site. As a result Linley Close/Ambrose Road immediately east and north of the permitted Wichelstowe development area is also outside the urban area boundary.	Preferably redefine the urban area boundary at Wichelstowe to reflect the true and exact extent of the urban area as indicated on the attached plan or augment paragraph 3.11 by adding to the end: 3.11.....The definition of the Swindon Urban Area on the Proposals Map will be refined as appropriate, including through the Site Allocations DPD to allow for the identification of non-strategic housing and other development sites to meet outstanding Core Strategy development requirements.
306	1	Strat Obj		The monitoring indicators may not be closely related to the efficacy of the Core Strategy, for example, many are principally delivered through mechanisms other than spatial planning.	
306	2	Strat Obj		The indicators will not measure whether the objective has been met. For example, the economy objective relates to enhancing Swindon's position as the UK's best business location, yet none of the indicators will answer the question as to whether this has happened. Question whether the plan is sound based upon the appropriateness of the monitoring indicators.	
306	3	SO1		Sustainable Development means something more wider than the text under this heading. It would appear that the main element of this policy is around climate change, mitigation and adaptation and thus the title of this SO should be changed to reflect this. We question whether the plan is sound on the basis of the appropriateness of this title.	

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306	4		SO10		We would like to see more indicators added to the Green Infrastructure Strategic Objective. It is also not clear where the methodology for the local indicator around 'quantity and proportion of strategic green corridors developed'	Suggested indicators: 1. Proportion of the population living in areas meeting Angst or similar local target 2. Amount of biodiversity gain delivered through the planning process.
306	5	2	CP1		Para 2.1 makes reference to environmental enhancement, however there is no reference to this in CP1.	Suggest adding the following: v. Contribute to delivering green infrastructure This would address some or all of the issues raised in the SA, para 7.2.3
306	6		CP1		The HRA recommends that Policy CP1 makes explicit commitments to address water demand and promote work on cross boundary solutions where appropriate to avoid and mitigate potential impacts (c.f para 7.2.5 of the SA)	
306	7		CP2		Infrastructure and services should be there to meet the needs of the community	Suggest redrafting point one of the policy to read: I. Infrastructure and services are provided to meet the needs of the community
306	8		CP2		It is not explicit whether green infrastructure is 'essential infrastructure' or not essential. We consider that GI is essential and this is supported by a raft of evidence (re the SW RSS).	If it is accepted that GI is essential, GI should be mentioned in para 2.9, 2.10 and changed to include CP10.
306	9		CP2A		Suggest some additional wording to Policy CP2A.	At point C "Development will minimise the risk of flooding and maximise the inclusion of floodplain areas within Green Infrastructure strategies, making appropriate use of Sustainable Urban Drainage Systems (SUDS)"

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306		10	CP4		Concerned that 10,200 dwellings can be built within Swindon without conflicting with the RSS requirement that developments should enhance green infrastructure. Many of the small greenfield urban sites are likely to provide, at the very least, visually accessible green infrastructure, which is likely to be degraded by development on them.	
306		11	CP7		Concerned by the inclusion of the Purton Road - Great Western Way link road in this policy. Such a road may conflict with current green infrastructure function of the land it crosses and foreclose opportunities to enhance this function and cut across a Strategic Nature Area. Concerned that the impacts of such road have not been considered thus will prejudice any debate over the need for this road vs. the need to maintain and enhance green infrastructure prior to evidence being presented.	
306		12	CP7		With regards to the Purton Road - Great Western Way link, it is not clear what is meant by a "sustainable transport link". Policy is in potential conflict with other policies in the plan.	
306		13	CP9		The policy makes no reference to the public health impacts of new development. The Core Strategy has a major influence over public health and the RSS policy HE2 promotes health considerations in the preparation of LDDs.	To address the deficit, we feel that the document should make reference to the role green infrastructure can play in improving public health.
306		14	CP9		We feel that it would be appropriate to recognise the role of GI has in reducing crime levels, given the body of evidence supporting this position.	

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306		15	CP10		Support for policy CP10	
306		16	CP10A		The current wording in the policy suggests that the canal restoration is desirable without providing enough supporting evidence to demonstrate this as fact. There may be economic, biodiversity and water resource constraints which may mean that canal restoration in this instance is not desirable.	Suggest the policy is amended to read "will be safeguarded so that options for their future restoration and re-establishment as navigable waterways are not jeopardised" Then this presumption in favour of restoration would not be made (and associated evidence would not be needed).
306		17	SSP7		The proposed urban extension at Commonhead should not have a negative impact on Coate Water SSSI and that the land east and south of Coate Water SSSI, which is not built upon, should be utilised to its full potential. The draft RSS identifies the area between the allocated land, Coate Water and the M4 as a Strategic Nature Area (as identified in Policy ENV4). Consider that this is one of the biggest opportunities in the CS to comply with the RSS and contribute to the delivery of SO10 and CP10. It will also help to meet the requirements to protect and enhance the SSSI. The development of GI at this location could include the creation of a "Swindon Wetland Centre" making it a flagship attraction on the edge of town.	The land to the east and south of Coate Water SSSI should be identified as land required for GI and secured for such when and as planning is granted on the land allocated in Fig15. It would also need to be identified as a critical infrastructure requirement in order to secure funding.

<i>Respondent Ref</i>	<i>Comment No. Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
306	18	SSP7		The policy does not require the enhancement of the SSSI which should form the minimum requirement of this policy.	<p>policy should be rephrased to say: "Create a robust and functional buffer between Coate Water Country Park and new development which enhances the SSSI and creates additional GI"</p> <p>Supporting text to the policy should also set out what a "robust and functional buffer" means. It should be explicit about the extent of the buffer which will form most of the land between the allocated land, Coate Water and the M4 as far as the wood south of the Country Park, to be managed as GI.</p>
306	19	SSP7		Unclear why the Commonhead preferred option to "expand Coate Water Country Park to incorporate the land between the new development and the existing Country Park providing a functional and robust buffer between the development and existing biodiversity assets" was dropped as this is closer to the suggestion made in previous comments (objection number 18).	
306	20	SSP8		Concerned about the lack of regard the EDA has with respect to the AONB and this is reflected in policy SSP8. The policy makes no reference to the AONB nor the South Marston Strategic Nature Area as identified in the draft RSS (Policy ENV4), part of which overlaps the EDA.	
306	21	SSP9		Under point x) of the policy, Natural England are concerned that the Cricklade Country Way Corridor has not been identified as a critical infrastructure project . Therefore we question the deliverability of this policy.	

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306		22	SSP10		Not clear why point vii) has been included. Furthermore, it is also not clear, under point ii) what is meant by "sustainable travel solutions for all modes of transport"	Suggest that point ii) reads: "Provide sustainable transport links to the existing Swindon.."
306		23	SSP10		With regards to point vi) of the policy, development should enhance, not merely fail to jeopardise GI links. It is also likely that this development falls near or upon one of the Strategic Nature Areas as identified in policy ENV4 of the RSS. The policy should make reference to enhancing the Moulton Hill Strategic Nature Area. This point should be expanded in para 3.77	Reword point vi) to state: "enhance the function and character of the GI links including the River Ray wildlife corridor, the Cricklade Country Way and Moulton Hill Strategic Nature Area".
306		24	SSP11		It is not clear why under part D, some generic infrastructure requirements are stated but others not, for example green infrastructure. This gives the impression that there are two tiers of infrastructure requirements; a top priority tier and a lower priority tier as given in the DMP policies. GI should be included as essential infrastructure on a par with, for example, education.	
306		25	DMP8		It is unclear how the Core Strategy will deliver site specific green infrastructure measures on land outside the development boundary (for example, creating a new footpath link) over which the developer has no control. This questions the deliverability of the policy particularly in terms of value for money. Without such mechanism, new developments will fail to integrate into their surrounding area.	

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306		26	DMP8		<p>Concerned that two issues of GI will 'slip through the policy framework'. This is with regards to visual access and being explicit about the function that GI delivers.</p> <p>Re: first point: An area of private land may still serve a valuable GI function by being viewed.</p> <p>Re: second point: The retention of a greenfield public right of way may, by enclosing it, reduce its usage thus should be regarded as a loss of GI.</p>	The supporting text to para 4.79 should emphasize the function of GI.
306		27	DMP8		Open space standards as set out in App3 should include Natural England's greenspace standards.	
306		28	DMP8		<p>It would be useful if, either in the Core Strategy or GI Strategy, clarity was given to applicants with regards to two key features:</p> <ol style="list-style-type: none"> 1. Applicants clearly stating what the anticipated net impact on biodiversity is likely to be 2. That all proposed measures are written in a way that allow the development management officer to make these conditions 	
306		29	App3		<p>The table should state that allotment provision is currently under review.</p> <p>It would also be helpful if the 1ha minimum size for local open space stated in the GI strategy (p 48) was repeated here</p>	
306		30	App3		Endorse the move from provision being based on a ward by ward basis to that of a distance threshold, now mapping technology permits this	

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306		31	App3		It is not clear how the accessibility standards have been derived. For example, in the open space audit, data describes the current situation in Swindon rather than evidence need.	
306		32	SA		The SA is confusing in that much of it refers to various preferred options rather than referring to submission draft policies which are sometimes not the same as any of the options presented in the preferred options consultation	
306		33	SA		Para 7.9.2 seems to state that policy CP7 does not specify any specific schemes yet the policy identifies the Purton Road - Great Western Way link. Question the value of the SA.	
306		34	SA		Para 7.11 does not talk about public health. This is an omission.	
306		35	SA		The SA recommends that the policy should be changed to state that any buffer around Commonhead should be to the satisfaction of NE. The Commonhead policy should be much more than providing a minimum buffer.	
306		36	SA		Draw your attention to the varying impacts on the need for a Purton Road - Great Western Way link depending on the location of this allocation.	
306		37	SA		Support the statement with regards to placing a higher priority on the promotion of sustainable modes of transport.	
306		38	GI Strategy		Green Infrastructure Strategy Para 1.4.2 is not helpful as it does not give a complete list of GI assets	

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306		39	GI Strategy		Green Infrastructure Strategy Evidence to support access to natural greenspace standard (ANGSt). For info English Nature have provided as series of links in the original copy of responses made.	
306		40	GI Strategy		The 300m is based upon a buffer zone drawn from access points and assumes a 5 minute walk. Further work completed by Coles and Bussey have shown that 5 minutes walking distance to home is an ideal range. Suggest that this is used as a robust measure.	
306		41	SA		2 hectares. Evidence from Box and Harrison 1993 suggest that 2ha is a minimum size to be included in local plans at the time and at a size that was felt by many land managers to be big enough to incorporate some significant variety within the space. Further info is provided in the original response.	

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319		1	SSP7		The Government's White Paper "Communities in Control: Real Power, Real People" calls for local authorities to involve communities in the decision-making process. Policy SSP7 clearly conflicts with Government when 52,000 people have signed a petition in order to ensure that a 1km buffer of countryside is protected against development east and south of Coate Water Country Park. The council have ignored this.	Delete wording of SSP7 and replace with: i) Up to 10 hectares of land at Commonhead will be safe-guarded for future expansion of the Great Western Hospital. ii) Land between the hospital, Coate Water Country Park and the motorway is designated for its high landscape value, its special historic and literary quality and its potential ecological value. No development will be permitted iii) Land to the west of Day House Lane will be managed as a wildlife conservation area to add value to Coate Water SSSI, Coate Water Local Nature Reserve, Day Copse Local Nature Reserve and Burderop Woods North Local Nature Reserve.
319		2	SSP7		The policy is not justified - plenty of Brownfield alternatives exist to develop housing and employment land to meet government targets for Swindon. The land at Coate is more important to Swindon's future as an area of rural recreation and of high landscape value.	Delete wording of SSP7 and replace with: i) Up to 10 hectares of land at Commonhead will be safe-guarded for future expansion of the Great Western Hospital. ii) Land between the hospital, Coate Water Country Park and the motorway is designated for its high landscape value, its special historic and literary quality and its potential ecological value. No development will be permitted iii) Land to the west of Day House Lane will be managed as a wildlife conservation area to add value to Coate Water SSSI, Coate Water Local Nature Reserve, Day Copse Local Nature Reserve and Burderop Woods North Local Nature Reserve.

<i>Respondent Ref</i>	<i>Comment No. Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
319	3	SSP7		The proposal is inconsistent with the Council's previous commitment to protect this area from inappropriate development once the Great Western Hospital was built.	<p>Delete wording of SSP7 and replace with:</p> <p>i) Up to 10 hectares of land at Commonhead will be safe-guarded for future expansion of the Great Western Hospital.</p> <p>ii) Land between the hospital, Coate Water Country Park and the motorway is designated for its high landscape value, its special historic and literary quality and its potential ecological value. No development will be permitted</p> <p>iii) Land to the west of Day House Lane will be managed as a wildlife conservation area to add value to Coate Water SSSI, Coate Water Local Nature Reserve, Day Copse Local Nature Reserve and Burderop Woods North Local Nature Reserve.</p>
319	4	SSP7		It's not an effective policy. The area is remote from the main urban area of Swindon and cannot be integrated with the town.	<p>Delete wording of SSP7 and replace with:</p> <p>i) Up to 10 hectares of land at Commonhead will be safe-guarded for future expansion of the Great Western Hospital.</p> <p>ii) Land between the hospital, Coate Water Country Park and the motorway is designated for its high landscape value, its special historic and literary quality and its potential ecological value. No development will be permitted</p> <p>iii) Land to the west of Day House Lane will be managed as a wildlife conservation area to add value to Coate Water SSSI, Coate Water Local Nature Reserve, Day Copse Local Nature Reserve and Burderop Woods North Local Nature Reserve.</p>

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319		5	SSP7		It is not consistent with national policy – Delivering Sustainable Development (PPS1) – by virtue of the fact that the potential damage to the ecology, to an important literary landscape, to significant archaeological features, to strategic views from the North Wessex Downs AONB & Coate Water Country Park, to Coate Water SSSI and Day House Copse Local Nature Reserve cannot be secured.	Delete wording of SSP7 and replace with: i) Up to 10 hectares of land at Commonhead will be safe-guarded for future expansion of the Great Western Hospital. ii) Land between the hospital, Coate Water Country Park and the motorway is designated for its high landscape value, its special historic and literary quality and its potential ecological value. No development will be permitted iii) Land to the west of Day House Lane will be managed as a wildlife conservation area to add value to Coate Water SSSI, Coate Water Local Nature Reserve, Day Copse Local Nature Reserve and Burderop Woods North Local Nature Reserve.
366		1	SSP7		Council has ignored the majority view of 52,000 objectors to Coate development, contrary to the advice in the Government's White Paper "Communities in Control: Real Power, Real People - 2008"	Policy SSP7 should be deleted
366		2	SSP7		It's not an effective policy. The area is remote from the main urban area of Swindon and cannot be integrated with the town. More land needs to be set aside for the hospital expansion to meet the health needs of a growing town.	Delete SSP7

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366	3	SSP7		It is not consistent with national policy - Delivering Sustainable Development (PPS1) - by virtue of the fact that the potential damage to the ecology, to an important literary landscape, to significant archaeological features, to strategic views from the North Wessex Downs AONB & Coate Water Country Park, to Coate Water SSSI and Day House Copse Local Nature Reserve cannot be secured.	Policy SSP7 should be deleted. No confidence in "respected views" from Coate Water and North Wessex Downs AONB (Point x) or protecting archaeological features if surrounded by a modern estate (Point viii). No confidence that a "robust buffer" between Coate Water and new development will be created (Point ix) because there has been no recognition of the need to assess environmental impact of the development based on the literary value of Richard Jefferies' land.
366	4	SSP7		No mention is made of preventing the pollution from the landfill area proposed for development.	Delete SSP7
366	5	SSP7		The proposal is inconsistent with the Council's previous commitment to protect this area from inappropriate development once the Great Western Hospital was built.	Policy SSP7 should be deleted. No confidence in "respected views" from Coate Water and North Wessex Downs AONB (Point x) or protecting archaeological features if surrounded by a modern estate (Point viii). No confidence that a "robust buffer" between Coate Water and new development will be created (Point ix) because there has been no recognition of the need to assess environmental impact of the development based on the literary value of Richard Jefferies' land.
405	1	SSP7		Council has ignored the majority view of 52,000 objectors to Coate development, contrary to the advice in the Government's White Paper "Communities in Control: Real Power, Real People - 2008"	Policy SSP7 should be deleted.

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405		2	SSP7		It is not consistent with national policy - Delivering Sustainable Development (PPS1) - by virtue of the fact that the potential damage to the ecology, to an important literary landscape, to significant archaeological features, to strategic views from the North Wessex Downs AONB & Coate Water Country Park, to Coate Water SSSI and Day House Copse Local Nature Reserve cannot be secured.	Policy SSP7 should be deleted. No confidence in "respected views" from Coate Water and North Wessex Downs AONB (Point x) or protecting archaeological features if surrounded by a modern estate (Point viii). No confidence that a "robust buffer" between Coate Water and new development will be created (Point ix) because there has been no recognition of the need to assess environmental impact of the development based on the literary value of Richard Jefferies' land. A reference to Richard Jefferies should be included.
405		3	SSP7		It's not an effective policy. The area is remote from the main urban area of Swindon and cannot be integrated with the town.	Policy SSP7 should be deleted.
406		1	SSP7		I support the allocation of at least 5.5ha for hospital expansion., but the housing and employment land figures need to be reduced and usage linked to the hospital in order to make use of existing infrastructure. This small parcel of rural Swindon is essential in improving the quality of people's lives.	>> SEE DIAGRAM IN ORIGINAL REPRESENTATION FORM RESPONSE. This diagram locates a smaller-scale land parcels for development
406		2	SSP7		I have no confidence that SSP7 can lead to the creation of a "functional and robust buffer between Coate Water Country Park and the new development" without designating the land under another landscape protection policy. The Green Infrastructure network Figure 7 in page 55 only indicates the protection of a small strip of land from the D-shaped field to Day House Lane.	Buffer land proposed under SSP7 (ix) should be included in Policy DMP8 (Green Infrastructure Principles) and Appendix 4. Please also correct the spelling of "Jefferies" in Appendix 4 Figure 7 attached to CP10 should include all land south and east of Coate Water Country Park up to the M4 Motorway and Day House Lane.

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406		3	SSP7		SSP7 is in conflict with advice in Paragraph 2.114 that supports protecting and enhancing historic landscapes. Significant historical/literary importance associated with the writer Richard Jefferies. Proposed areas of development in SSP7 include key fields of significant archaeological importance to the north of Day House Lane opposite the Richard Jefferies Museum dating back to the Neolithic period. Fields of major Medieval archaeological significance at Badbury Wick. Day House Copse (Local Nature Reserve and ancient oak woodland) would be isolated from Coate Water, therefore restricting movement of terrestrial wildlife species dependent upon the link.	Key areas of archaeological importance within the current development plan should be removed from development plan AS PER DIAGRAM IN ORIGINAL REPRESENTATION FORM.
406		4	SSP7		Day House Lane is used for regular recreation uses (walkers, joggers, cyclists, horse riders) is a key gateway to Liddington Hill on the Downs. The rural nature of the road should be protected to ensure that this road does not become a major access route to the proposed development site.	Remove significant archaeological sites from proposed development plan AS PER DIAGRAM IN ORIGINAL REPRESENTATION FORM
406		5	SSP7		SSP7 includes land that was previously used as landfill to bury waste and was never subject to regulation. It is contaminated and leached pollutants into the air, ground and water. This is not an appropriate after-use management.	The only appropriate after-use of this land is for public open space or tree planting unless the whole landfill area is excavated and made good with uncontaminated soil.
406		6	SSP7		SSP7 includes land next to Junction 15 of the M4 Motorway that is very visible from Liddington Hill and the castle. This is in conflict with respecting views from the North Wessex Downs AONB	

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408		1	SSP7		The views of 50,000+ people have been ignored by Swindon Borough Council, contrary to the Government White Paper "Communities in Control" (2008)	
408		2	SSP7		Policy SSP7 is contrary to national policy on potential damage to the physical and historical environment + landscape (PPS1), particularly with regard to archaeology, natural history and cultural connections. Swindon has few cultural credits - Richard Jefferies' writings house, landscape and land form the one jewel in its crown.	<p>Policy SSP7 should be deleted.</p> <p>-The area must be defined in area and fully protected. An unspecified 'robust' buffer is quite inadequate to protect the area.</p> <p>-"Respect" for the views from and to the North Downs is a woolly and meaningless phrase.</p>
421		1	SSP7		Council has ignored the majority view of 52,000 objectors to Coate development, contrary to the advice in the Government's White Paper "Communities in Control: Real Power, Real People - 2008" . The majority view has been ignored.	<p>Policy SSP7 should be deleted. No confidence in "respected views" from Coate Water and North Wessex Downs AONB (Point x) or protecting archaeological features if surrounded by a modern estate (Point viii). No confidence that a "robust buffer" between Coate Water and new development will be created (Point ix) as the land-use has not been designated under other policies. No recognition is made of the need to assess the environmental impact of the development on the literary value and merits of Jefferies land.</p>

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421		2	SSP7		It's not an effective policy. The area is remote from the main urban area of Swindon and cannot be integrated with the town. More land needs to be set aside for the hospital expansion to meet the health needs of a growing town.	Policy SSP7 should be deleted. No confidence in "respected views" from Coate Water and North Wessex Downs AONB (Point x) or protecting archaeological features if surrounded by a modern estate (Point viii). No confidence that a "robust buffer" between Coate Water and new development will be created (Point ix) as the land-use has not been designated under other policies. No recognition is made of the need to assess the environmental impact of the development on the literary value and merits of Jefferies land.
421		3	SSP7		It is not consistent with national policy – Delivering Sustainable Development (PPS1) – by virtue of the fact that the potential damage to the ecology, to an important literary landscape, to significant archaeological features, to strategic views from the North Wessex Downs AONB & Coate Water Country Park, to Coate Water SSSI and Day House Copse Local Nature Reserve cannot be secured.	Policy SSP7 should be deleted. No confidence in "respected views" from Coate Water and North Wessex Downs AONB (Point x) or protecting archaeological features if surrounded by a modern estate (Point viii). No confidence that a "robust buffer" between Coate Water and new development will be created (Point ix) as the land-use has not been designated under other policies. No recognition is made of the need to assess the environmental impact of the development on the literary value and merits of Jefferies land.

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421		4	SSP7		The policy is not justified - plenty of Brownfield alternatives exist to develop housing and employment land to meet government targets for Swindon. The land at Coate is more important to Swindon's future as an area of rural recreation and of high landscape value.	Policy SSP7 should be deleted. No confidence in "respected views" from Coate Water and North Wessex Downs AONB (Point x) or protecting archaeological features if surrounded by a modern estate (Point viii). No confidence that a "robust buffer" between Coate Water and new development will be created (Point ix) as the land-use has not been designated under other policies. No recognition is made of the need to assess the environmental impact of the development on the literary value and merits of Jefferies land.
421		5	SSP7		No mention is made of preventing the pollution from the landfill area proposed for development.	Policy SSP7 should be deleted. No confidence in "respected views" from Coate Water and North Wessex Downs AONB (Point x) or protecting archaeological features if surrounded by a modern estate (Point viii). No confidence that a "robust buffer" between Coate Water and new development will be created (Point ix) as the land-use has not been designated under other policies. No recognition is made of the need to assess the environmental impact of the development on the literary value and merits of Jefferies land.

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421		6	SSP7		The proposal is inconsistent with the Council's previous commitment to protect this area from inappropriate development once the Great Western Hospital was built.	Policy SSP7 should be deleted. No confidence in "respected views" from Coate Water and North Wessex Downs AONB (Point x) or protecting archaeological features if surrounded by a modern estate (Point viii). No confidence that a "robust buffer" between Coate Water and new development will be created (Point ix) as the land-use has not been designated under other policies. No recognition is made of the need to assess the environmental impact of the development on the literary value and merits of Jefferies land.
428		1	SO6		UKCPT supports SO6 and considers, in accordance with PPS6 and draft PPS4, Swindon Town Centre and its core retail area should be the primary focus for the retail investment activity over the Core Strategy period.	
428		2	CP1		UKCPT supports CP1 and the principles of sustainable development underpinning all policies and proposals for spatial development in the Borough.	
428		3	CP1		UKCPT support part C of CP1 which seeks to address sustainability issues through energy efficiency and low/zero carbon energy development.	This should be subject to viability and considered on a development by development basis, taking into account the opportunities and constraints presented by each site.
428		4	CP3		UKCPT support CP3, in particular focusing new office development in the Swindon Central Area.	

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428	5		CP5		UKCPT agrees with the first sentence of CP5. UKCPT considers that the existing town centre and retail core should be the focus for retail development, and that measures should be taken to regenerate, preserve and enhance the vitality and viability of the retail core.	
428	6	A	CP5		UKCPT consider that part A is not worded strongly enough. The current wording is too 'positive' and does not necessarily prevent major shopping developments coming forward in out of centre locations. Changing the wording and ordering of CP5 part A would strengthen the focus of retail development in the Town Centre, and preclude developments outside of the Town Centre which do not meet the tests set out in PPS6.	Change "Any major shopping development WILL be considered outside of Swindon Town Centre where it can be shown that" to "Any major shopping development WILL ONLY be considered outside of Swindon Town Centre where it can be shown that" Points (ii) and (iii) should be swapped round.
428	7	2.63, 2.79	CP5		UKCPT considers that planning policies should support investment in Swindon Town Centre, and supports para 2.79 which states that CP5 will be implemented through a sequential approach to retail provision in line with PPS6.	
428	8	2.75, 2.76	CP5		UKCPT support paras 2.75 and 2.76 that note it will be important to resist pressure for more out-of-centre development of retail warehouses, and that food retailers should be encouraged to open non-food only stores in the town centres.	
428	9		CP7		UKCPT supports CP7 and wishes to ensure that measures to promote and enhance Sustainable Transport and Movement make it easy to visit Swindon Town Centre as a shopping destination.	

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428	10		CP10A		UKCPT supports the aspiration for canal/waterside led renewal, however, in accordance with PPS12 'tests of soundness', UKCPT considers that this aspiration should not preclude other developments coming forward which can also help deliver the comprehensive regeneration of Swindon.	
428	11		CP10A		UKCPT objects to the proposed canal route being 'safeguarded'. This is very strong policy wording in the context of the uncertainty of the feasibility/deliverability of the proposal. Safeguarding the route implies a blanket policy across the area, which could frustrate other opportunities. PPS12 states that DPDs should be flexible and able to be monitored, and safeguarding a route for such a major scheme does not represent flexibility.	<p>The policy should be flexible to react to changing circumstances, particularly given the costs and uncertainty associated with its delivery. The term 'safeguarding' should not be used, and instead the canal route should be referred to as 'to be given due consideration'.</p> <p>Small deliverable regenerating developments should be given equal importance to Swindon as the longer term, more major, aspiration for a canal.</p> <p>UKCPT considers the canal will cost at least £50m and that this figure should be viewed as a minimum rather than a maximum estimate.</p>
428	12	3.4	SSP5		UKCPT supports the approach that priority is given to the expansion and improvement of the town centre and regeneration of the wider central area.	
428	13		SSP8		UKCPT is supportive of the development of a large sustainable community to the east of Swindon, as it will benefit Swindon town centre.	

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428		14	SSP8		In order to be sustainable, the EDA will need adequate infrastructure and community facilities to support the increase in population. UKCPT wishes to ensure that the proposed employment and retail offer at the EDA district centre will not be to the detriment of the existing town centre, in accordance with PPS6.	
428		15	SSP4		UKCPT supports the principles of parts A to F of SSP4, that the existing retail core should be the focus of retail-led development.	
428		16	SSP4		As currently worded, SSP4 does not comply with PPS6. Para 2.13 of PPS6 states that in preparing their RSS, the Regional Planning Body should assess the need for additional floorspace, specifically comparison retail, in five-year periods. The approach in the Core Strategy does not promote the phasing of development or allow for a monitoring or review of capacity.	Changes are required to the wording of these parts of SSP4, in order to allow for phasing of developments, to protect the town centre.
428		17	SSP4		The Central Swindon Area Action Plan (CSAAP) Development Plan Document (DPD) adopted Feb 2009, provides a detailed policy framework. Future development areas are phased for delivery of retail floorspace in the document: Site A Regent Place (35,000m2 floorspace); Site B Sanford Street Area (12,000m2); and Site C Upper Bridge Street/Fleet Street Area (7,500m2).	Explicit reference should be made in SSP4 to the CSAAP, and the phasing set out (Areas A, B and C) within this.

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428	18		SSP4		UKCPT would welcome a commitment to adopting the principle of conducting further work to forecast future retail growth within the Borough. This would enable development strategies to be prepared in-step with predicted forecasts and for appropriate development opportunities to be maximised, to support the regeneration of the Central Swindon Area.	
428	19	3.38	SSP4		Para 3.38 states that "A future piece of work 'Swindon Town Centre the way ahead' will be completed to consider Regents Place in light of Modus going into administration". UKCPT supports this work being undertaken, and considers that the views of key stakeholders in the town centre (such as UKCPT) should be sought as part of this exercise.	
428	20		SSP8		UKCPT is supportive of the development of a large, sustainable community (the EDA) which will benefit Swindon Town Centre.	
428	21		SSP8		The employment and retail offer at the EDA district and local centres should be provided at an appropriate scale. Development in the centres should be appropriate to their function, and not be of a nature and scale which would prejudice the current and future vitality and viability of Swindon town centre. UKCPT agrees with part B vi) of SSP8, which states that comparison floorspace at the EDA District Centre should not be of a scale and nature that is commensurate with its function, and does not compete with Swindon Town Centre.	

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428		22	DMP1		UKCPT supports the wording in Part 12 of DMP1, emphasising the words "unless it can be demonstrated that such provision is not technically or economically viable".	Parts 10 (Energy Assessment) and 11 (Sustainable Construction [for major development]) of DMP1 should also include reference to considering these requirements in terms of technical and economic viability.
428		23	DMP1		Non-residential buildings will be required to achieve a BREEAM 'Excellent' rating. UKCPT considers that a BREEAM rating of 'Excellent' may be hard to achieve, particularly for developers only providing the shell and core of a commercial building. There is no statutory requirement in national planning policy for commercial buildings to achieve a particular BREEAM rating.	Flexibility should be introduced to this policy to state that this is a target or aspiration of the Council, and is to be met where possible and subject to viability. The commentary on Part 11 of DMP1 should be amended to read: "Non-residential development shall seek to achieve the Building Research Establishment Environmental Assessment Method (BREEAM) standard of 'Excellent' where this is technically and economically viable." The amended wording will encourage investment in the town centre by ensuring that potentially unrealistic targets do not place onerous requirements on developers and tenants of commercial buildings.
428		24	DMP1B		UKCPT supports the principles and wording of DMP1B and believe that the balanced approach to assessing proposals will allow an overall optimum solution to be achieved, as opposed to rigid requirements being applied that might frustrate opportunities for providing renewable and low carbon energy development.	

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428		25	DMP2		UKCPT supports the current wording of DMP2 and the principle of using planning obligations to ensure developers provide the planning benefits which are necessary to support and serve proposed new development where necessary. Planning obligations entered into by the Council and developers should meet the tests of Circular 05/2005.	
428		26	DMP2		UKCPT supports the proposed production of a SPD providing guidance on the provision of infrastructure, community benefits and planning obligations.	
428		27	DMP2		In accordance with Circular 05/2005, S106 agreements should be used only to mitigate the impacts of a proposed development and not to remedy existing deficiencies in infrastructure provision. S106 contributions should not be used to fund non-essential infrastructure, such as the proposed canal.	
428		28	DMP3		UKCPT agrees with the designation of Key Employment Areas on the Proposals Map, and also Part C of DMP3.	
428		29	DMP3		UKCPT agrees that development should not be permitted where it is considered that it would adversely impact upon the regeneration of the Central Area.	
428		30	DMP3			UKCPT considers that a holistic long term view should be taken to regeneration, rather than site specific allocations being rigidly adhered to.
428		31	DMP4A		UKCPT supports the principle of policy provision for affordable housing.	

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428		32	DMP4A		UKCPT considers that the provision for 35% of the units to be affordable should be subject to viability, and should also reflect the need for affordable housing in the vicinity of the development. For example, more housing might be required in villages around Swindon than in the town centre.	The proportion of affordable housing to be provided should be decided on a site by site basis, rather than a 'blanket' approach being applied across the whole Borough.
428		33	DMP5		UKCPT supports DMP5, which seeks to ensure that new developments are adequately served in terms of transport, and that any negative impacts of new developments on transport infrastructure are adequately mitigated/managed.	
428		34	DMP5		The requirement for a Travel plan to be submitted at application stage could be onerous for developers and occupiers of commercial developments, particularly where developments (or parts of) are speculative. UKCPT is concerned, particularly in the current economic climate, about placing onerous requirements on occupiers.	A Travel Plan should not necessarily be required for every development, this should be considered on a case by case basis. The detailed commitments in any Travel Plan should be secured at the occupation stage of a development.
430		1	Spatial Vision		Paragraph 1.2 We particularly endorse references to a "thriving regenerated town centre" and "cutting edge new university" It is imperative that this emphasis permeates to other Local Development Documents within the LDF. Consistency is extremely important.	

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430		2	CP1		<p>Paragraph 2.3:</p> <p>There is not reason to believe that the sequential approach in planning policy will become redundant, there ore there is no reason to mention a "short to medium term" timescale. This is currently confusing.</p>	Delete the words "in the short to medium term" from the final sentence in paragraph 2.30.
430		3	CP1		We strongly support the emphasis on sustainability in the delivery of new development.	
430		4	CP2A		We support the contents of this policy, however this policy is incongruous when considered in the context of other policies in this section of the Core Strategy. The importance of water infrastructure is unduly heightened above all other provisions. The detailed measures contained in Policy CP2A could be addressed through CP2 with a specific reference to water infrastructure.	Delete Policy CP2A and revise Policy CP2 if necessary.
430		5	CP3		<p>We Strongly support Criterion B. The wording in our view is sound and robust.</p> <p>We have some concerns over the allocation of employment land in urban extensions - it is important that these must meet the sequential principles set out in Criterion B.</p>	
430		6	CP5		<p>We particularly support:</p> <ul style="list-style-type: none"> - Town Centre as the pre-eminent location for major shopping development. - No additional retail development in the Northern Orbital Centre or Greenbridge Retail Park 	

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430		7	CP5		A basic level of retail provision is suitable within the EDA. We support the reference to "convenience floor space" in paragraph 2.73 - The goods for sale within the new foodstore in the EDA should be clearly controlled through planning condition to ensure that the store meets food-based retail only and does not compete with the comparison goods on offer within the town centre. We therefore endorse paragraph 2.76 that any non-food element of a food store should be pressed to open in town centres rather than at existing out-of-centre stores.	
430		8	CP6		We support the provision of a new university on the North Star site. It would assist in retaining young people within the town as well as increasing retail and leisure expenditure in the central area. It was also endorsed by the Secretary of State in the recent appeal decision for the land at Commonhead.	
430		10	CP8		This policy must be applied extremely carefully to ensure all appropriate facilities are directed towards central locations. This will increase visitor numbers and enhance regeneration proposals.	
430		11	SSP4		Supported. It is consistent with the Central Area Action Plan. This will create a vibrant, viable and sustainable focus for Swindon. The increased student population through delivery of a new university campus will benefit both the daytime and evening economy.	

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430		12	SSP10		SSP6,7,9,10 We strongly support the timely delivery of high quality, frequent, rapid transit links between urban extensions and the town centre to ensure that the town centre benefits from the substantial growth proposed in various urban extensions.	
430		13	SSP8		Our concern is that provisions in the EDA should not conflict with the overarching principle that primary focus should be given to the town centre. For instance: - A size cap on individual office buildings in the EDA. Office size commensurate with location - Retail provision in the EDA should be limited to convenience goods. - District centre should not include uses that would compete with the town centre.	No proposed changes
430		14	CP7		Paragraph 2.94 We support the rapid transit link between the EDA and the town centre - a high quality and frequent public transport connection is essential to prevent the EDA becoming an isolated dormitory extension. Therefore reference to the timing of the link should be included in the policy, even if the details regarding phasing and routes are beyond the scope of the Core Strategy.	Insert an additional bullet point within paragraph 2.94 stating: "Early delivery of the rapid transit link between the Eastern Development Area and town centre in order to influence travel patterns from the outset"
430		14	DMP1		We support delivery of high quality development. Where this has an influence over development proposals, we will ensure these are consistent with the design objectives.	

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430		15	DMP2		<p>It is important that this policy is applied pragmatically and where necessary flexibly to ensure it reflects prevailing market conditions.</p> <p>It is particularly important where proposals would provide much needed new employment or town centre regeneration benefits but are not viable if unduly onerous contributions are sought.</p>	
430		16	DMP3		We particularly support Criterion A(ii) and C and paragraph 4.37.	
433		1	SSP9		Please do not consider using Tadpole Lane for any more traffic. It is unsafe for walkers, particularly with trucks driving well over the speed limit. Any additional traffic must be routed on a new road back down to Thamesdown Drive (before Tadpole Lane) such that the traffic would have to come north up the A419 junction to get on to the A419.	
433		2	SSP9		Understand that the commercial rubbish tip (bottom of Blunsdon Hill off the A419) is to be zoned as "Light Industrial Development" when the tip closes. Observing the clauses of the land's sale, the absent original owner's will be paid tens of millions?	
434		1	CP2		National Policy PPS12 requires the infrastructure requirements to be set out clearly, relating to the implementation and phasing of development. Policy CP2 is not supported by the Evidence Base and it is not clear that the proposed major development can be brought forward within the required timescales.	Additional development land should be allocated (particularly for housing) as a matter of urgency in the Core Strategy including provision for smaller sites to come forward that have less impact in relation to infrastructure provision.

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434		2	CP4, SSP2		<p>The overall housing provision and its distribution is not adequately supported by any material in the evidence base to substantiate its delivery to a sufficient degree of certainty in accordance with National Policy in PPS12 and PPS3.</p> <p>Neither the Evidence Base nor the Core Strategy include any justification for the housing trajectory at Figure 11 or how it has been arrived at regard to the phasing and funding of infrastructure, lead in times and likely build rates. It would appear that the trajectory has been constructed on the basis of what would be required to precisely meet housing requirements from the chosen sites figures, an approach which is fundamentally unsound.</p>	<p>The Core Strategy must make provision for additional housing sites to come forward including smaller sites that can address the short term issues that larger sites cannot deal with because of the longer lead times associated with their implementation.</p>
439		1	SSP7		<p>The allocation at Commonhead is fundamentally sound in that it is based on a robust and credible evidence base and is deliverable, flexible and able to be monitored.</p>	
439		2	SSP7		<p>The sustainability of the allocation at Commonhead could be improved by enlarging it because that would make it more self-contained and better able to create a sustainable new community. The allocation is therefore not the most appropriate strategy when considered against the reasonable alternatives.</p>	<p>We seek enlargement of the allocation to accommodate in the order of 2,000 dwellings.</p>
439		3	SSP7		<p>The requirement for a two-form entry primary school in the policy as currently worded is not justified by the evidence and we seek its replacement with the requirement for a one-form entry school if the allocation is not enlarged. See attached submission for details.</p>	<p>If the allocation is not enlarged we seek the replacement of the requirement for a two-form entry primary school with a requirement for a one-form entry primary school.</p>

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439		4	DMP4A		<p>The provision of 35% affordable housing is not justified by the evidence base. The Core Strategy should require no more than 30% provision of affordable housing in accordance with the recommendations of the Strategic Housing Market Assessment. The Council has not demonstrated that it has taken viability into account in setting the level, as it is required to do. The policy needs to allow for public subsidy to be used which we submit requires the removal of the requirement that houses remain affordable in perpetuity. See attached submission for further details.</p>	<p>We propose the following amended wording:</p> <p>A. Provision shall be made for affordable accommodation as required by the following criteria:</p> <p>I) On all developments comprising 15 or more residential units, or on sites larger than 0.5ha, provision shall be made for 30% of the units to be affordable (subject to viability testing) unless it can be demonstrated that this will render the scheme unviable.</p> <p>II) In order to demonstrate that a scheme is not viable an applicant will need to submit financial appraisals</p> <p>III) Integration into the development layout will be required in accordance with Council requirements, unless in exceptional circumstances where the practicalities of doing so would compromise its delivery would be sought.</p> <p>IV) A dwelling breakdown and mix will be required that reflects the current needs of the Borough.</p> <p>B) Where affordable accommodation is to be provided a legal agreement will be required to ensure that the units:</p> <p>I) Are managed in accordance with the standards;</p> <p>II) Are designed and constructed in accordance with the Council's requirements.</p>

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439		5	DMP1		Government guidance seeks to discourage Council's from simply restating national policy. We therefore seek the deletion of sections 10, 11 and 13 from DMP1 to avoid this situation. National policy in this area may still be subject to change and the Core Strategy could find itself at variance with it. A more flexible approach would be to rely on national policy, compliance with which is mandatory through the building regulations. See attached submission for further details.	Delete sections 10, 11 and 13 of DMP1.

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442	1	SSP2		<p>The policy should allow for a degree of contingency to incorporate greater flexibility and robustness in the plan's overall housing land supply. It is unlikely that each source of supply will be delivered as suggested in draft policy SSP2.</p> <p>The capability of the EDA to deliver housing over the Plan Period has been overestimated given the current stage in the project, site constraints and major infrastructure required. The housing provision is unrealistic in terms of the delivery at Wichelstowe and the urban area, taking into account short/medium term delays given the state of the housing market.</p> <p>The sustainability of a "small scale urban extension" at Kingsdown has been recognised at the Preferred Options stage and should be retained as an allocation in Policy SSP2. Concerns raised over the delivery of necessary infrastructure can be resolved by increasing the capacity of the site, as proposed by the Kingsdown Village Partnership.</p> <p>The policy does not provide the most appropriate strategy when considered against reasonable alternatives set out at the Preferred Options stage. It is inconsistent with National Policy (PPS3) which requires the planning system to deliver a flexible responsive approach.</p>	<p>Policy SSP2 should be changed to provide more realistic estimates for the components of housing supply. Kingsdown should be included as a location for housing, with an allocation of up to 1,000 dwellings as promoted by the Kingsdown Village Partnership.</p>

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442	2	3.82	SSP11		Paragraph 3.82 recognises that longer term development opportunities could exist in the Kingsdown area, however a 'Reserved Sites' policy does not provide any certainty for investment in infrastructure to deliver a sustainable community within the Plan Period.	The policy should provide more clarity in identifying 'Reserved Sites'. The Kingsdown small scale urban extension (as identified at the preferred options stage) should not form part of this policy, but be allocated as under Policy SSP2.
458	1		Chapter 1		<p>The Core Strategy acknowledges Swindon's regional economic role and the fact that people commute in and out of Swindon. The evidence base for the Transport Strategy however considers only traffic within the Borough's boundaries. This is too narrow.</p> <p>Currently there is no public transport option for commuters from the north west of Swindon with resulting peak hour congesting in West Swindon. There is also no safe cycle route from Wootton Bassett into Swindon.</p>	<p>The Strategy needs to be reconsidered, taking account of Swindon's regional role and of the UK Government's intentions regarding reductions in future greenhouse gas emissions.</p> <p>The Core Strategy seems to assume that the future will be a linear extrapolation of the present. We do not believe that this will be the case: in particular the Strategy should take account of a future scenario in which fossil fuel use is much reduced, either because it has become scarce or through government regulation.</p> <p>Clearly this will require consideration of issues outside the Borough's direct control, including cooperation/discussions with neighbouring local authorities and the UK government.</p>

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458		2	CP7		<p>The transport element of the strategy cannot be considered sound when it will result in a 54% increase in CO2 emissions over a time period when government strategy requires a 14% reduction compared with a 2008 baseline (The Dft Low Carbon Transport: A Greener Future - A Carbon Reduction Strategy for Transport 2009). The per capita increase in emissions runs counter to both Swindon (LAA) and national (Climate Change Act) targets.</p>	<p>The Strategy needs to be reconsidered, taking account of Swindon's regional role and of the UK Government's intentions regarding reductions in future greenhouse gas emissions.</p> <p>The Core Strategy seems to assume that the future will be a linear extrapolation of the present. We do not believe that this will be the case: in particular the Strategy should take account of a future scenario in which fossil fuel use is much reduced, either because it has become scarce or through government regulation.</p> <p>Clearly this will require consideration of issues outside the Borough's direct control, including cooperation/discussions with neighbouring local authorities and the UK government.</p>
461		1	SO4		<p>Appears that the main sources of housing sites in the SHLAA are employment sites, schools, redevelopment of residential and open space, although the policy advises that it will maximise brownfield development.</p> <p>Concern that last 2 options would result in inappropriate backland development, detrimental to environmental quality and living conditions. Furthermore, higher proportions of family housing will reduce density. Policy should be flexible to address possible reversal of classification of garden as brownfield land.</p>	<p>Policy amended so secures:</p> <p>"a more balanced well design mix of housing will have been provided at a range of densities that makes the most efficient use of brownfield redevelopment opportunities and.."</p> <p>It may not be appropriate in every instance to maximise the density of a site due to the site characteristics and/or the need to provide a larger proportion of family housing.</p>

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461		2	CP2		<p>The Core Strategy does not provide definitive linkage between infrastructure provision and housing trajectory. Trajectory appears to be best estimate from Council of when things would need to be delivered to complete housing in available timescale. It does not appear to take into account the practicality of delivering infrastructure needed to commence development or likely availability of funding where infrastructure may be dependent on pooled resources. Second, policy does not set out how it would deliver its development obligations in the event that the Council cannot ensure infrastructure is available to support development.</p>	<p>Revise para 2.8:</p> <p>An infrastructure trajectory needs to be added to the Appendices identifying specifically what infrastructure is needed to enable the housing trajectory to be achieved, forming basis of annual monitoring such that should delays or shortfalls in infrastructure funding arise, leading to the delay in delivery, urgent action can be taken by the Council to address the issue by appropriate means.</p> <p>Identifying and harnessing sources of funding to either facilitate the provision of, or directly deliver infrastructure to support housing and economic growth is a vital part of this strategy, with which the vital parts cannot go ahead. In the event that infrastructure cannot be delivered, review of Core Strategy necessary to focus on reserve sites.</p>
461		3	CP2a(b)		<p>Focus on water infrastructure de-weights important aspects of other infrastructure, specifically sustainable energy production and transport. With regard to waste water, careful consideration should be given to the potential location of a STW to ensure it is not in an area of flood risk.</p>	<p>Additional policies on transport and energy infrastructure.</p>

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461	4		CP4c		We do not consider that the requirement that development be within the range of 40-50 dwellings per hectare is consistent with providing a full range/choice of house types. Expressed as a requirement rather than a target fetters provision of different house types, in response to locational characteristics and market demand.	Reword Clause B to provide flexibility referred to in 2.47, avoiding mandating minimum densities that are higher than national guidance and which run counter to other objectives in 2.45 and 2.46. Range of housing to meet demographic and market demands provided at suitable locations. Higher densities along transport corridors and community focal points with good access by walking/cycling (net density of 50dph). Elsewhere, efficient use of land through design, having regard to local characteristics, type and range of housing provided and prevailing national policy.
461	5		CP4c		We support the focusing of higher density homes in locations of outstanding accessibility.	
461	6	2.93-2.94	CP7		Para 2.93-2.94 fails to explain what is meant by the term that distinguishes CP7 (i) from improved bus services in CP7 (ii). Policy needs to clearly explain what is meant by a rapid transit system, how it will serve communities and when it will be delivered.	No suggested wording has been proposed because there is no indication in the Core Strategy about what a Rapid Transit System would constitute.
461	7		CP7		We support the principle of a rapid transit system.	
461	8	2.103	Figure 6		Figure 5 fails to indicate strategic location of park and ride sites.	Include location of strategic park and ride sites.

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461	9	2.107	CP7		<p>Development of 5000 dwellings in north and west Swindon only sustainable if sites are integrated into urban area, particularly transport. Furthermore, necessary to consider phasing and deliverability in relation to infrastructure issues holding development up or the extent to which development could proceed in advance/absence of infrastructure. These issues are particularly important in current economic climate.</p> <p>Locational distribution of new housing is unrealistic as infrastructure prerequisites were not known at time of RSS decision making. A rational approach should be adopted, based on evidence of most suitable locations capable of delivery. This is likely to include small/medium sites that have the ability to be implemented independently, but as part of the overall strategy.</p>	<p>Alternative to locating all small scale extension in one place should be pursued, giving consideration to sites to the north east of Swindon for housing and employment (and mixed use) to reduce daily commuting.</p>
461	10		SSP1c		<p>Emphasis should be on improving services and community facilities in secondary settlements. These settlement should be the focus of development outside the urban area to create additional demand for services and facilities and reduce the need to travel and therefore establish balanced communities.</p> <p>Each should be considered on a case by case basis, taking into consideration existing facilities, the population required to support and appropriate range of facilities and the linked land requirement for this.</p>	<p>Bishopstone, Broad Blunsdon, Chiseldon and Wanborough are identified as secondary settlements where, in addition to the provision of housing to meet local needs, suitable limited expansion to the settlement may be considered appropriate where it can be demonstrated that it would protect or enhance the range of community services (including retail, health and children's centres) that are available.</p>

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461	11		SSP2		We have concerns about the connection between the housing trajectory and the Council's ability to facilitate supporting infrastructure. We question the Council's assumptions about the capacity of the urban area, specifically policy SSP2 has no margin for error, or flexibility to enable the Council to address differing outcomes without the need to wholly revise the strategy.	The Council will seek to identify a resource of reserve sites in accordance with policy SSP11 (as modified by our previous representation)
461	12		SSP2		It should be noted that Commonhead has a number of environmental constraints which includes SSSI over part of the site. The university has now withdrawn and the allocation reduced to 750. A recent planning appeal to development the site for a university, hospital extension, commercial and 1800 dwelling was dismissed. The allocation should therefore be removed and redistributed to less environmentally sensitive locations.	Reference in table 4 to Commonhead should be deleted and an additional row for reserve sites (number of units to be determined) inserted. Number of dwellings should include a range in order to address a range of scenarios to meet any shortfall in projected 34,200.
461	13	3.22	SSP2		Ridgeway Farm/Moredon Bridge allocation is in Wiltshire and such needs to be confirmed in Wiltshire Core Strategy. This creates an additional obstacle to the site coming forward. Also, we understand Swindon Borough Council have objected to the allocation of 300 dwellings to the west of Swindon due to the impact this will have. To ensure the small scale urban extensions are deliverable, there should be an assessment of the physical infrastructure required to support the sites.	In order to avoid a shortfall in required housing numbers as a results of sites being rejected or not coming forward, suitable alternative reserve sites should be promoted through SSP11.

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SSP6

Policy states that this is an existing Local Plan Allocation for mixed use/4500 dwellings. However, despite gaining outline permission in 2005, to date, only 517 dwellings have been approved, with 200 under construction. Further more, revisions to the masterplan may be required which could delay things further.

As an alternative, locations providing smaller sites could be developed as flexible and viable alternative without the need for pre-commencement infrastructure. This approach would have the benefit of spreading the impact around the urban edge of Swindon, although it would still be possible to "pool" certain financial contributions to address wider infrastructure requirements, as envisaged by the Community Infrastructure Levy

461

15

SSP7

Commonhead has a number of environmental constraints which includes SSSI over part of the site. The university has now withdrawn and the allocation reduced to 750. A recent planning appeal to develop the site for a university, hospital extension, commercial and 1800 dwelling was dismissed.

The allocation should therefore be removed and redistributed to less environmentally sensitive locations.

Delete allocation.

<i>Respondent Ref</i>	<i>Comment No.</i>	<i>Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
461		16	SSP8			Given delivery issues with the EDA and Wichelstowe, effective criteria for identifying reserve sites are necessary to address any shortfall. Furthermore, the proposals in SSP8 should be amended to be consistent with DMP1a and the requirement that sites in zone 3 flood risk areas should not be promoted where there are sequentially preferable sites available.
461		17	SSP9		Tadpole Farm is planned as an extension to the Northern Development Area and therefore misses an opportunity to connect with the A419 which would have advantages including direct access to the principal road network, better employment opportunities due to better connectivity, and improved public transport.	Reference to connections between Tadpole Farm and the A419 should be included within policy SSP9. Policy SSP10 should be amended with any residual housing allocation allocated to sites around the Swindon Urban Area.

<i>Respondent Ref</i>	<i>Comment No. Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
461	18	SSP10		<p>We are concerned about the impact of an additional 3000 dwellings allocated west of Swindon. Further more, it is necessary to consider deliverability and phasing problems as a result of infrastructure delays. The figure of 3000 dwellings was taken from the RSS and was not soundly evidence based, as the RSS has not been finalised and therefore progress on this is premature.</p> <p>Main constraints on an urban extension west of Swindon include:</p> <ul style="list-style-type: none"> - Too many units in one locations and the risk of delay. - West of Swindon has high landscape and biodiversity value which the RSS has not considered. - Preferred option includes sites prone to flooding. - Remoteness of future residents to facilities, particularly schools, employment, hospitals and Swindon town centre. <p>There is little coherence in terms of growth to the west of Swindon. Tadpole Farm (which is supported) appears to have been devised in isolation with no scope to assist in infrastructure delivery, for example public transport. Such issues are particularly important in present economic climate.</p> <p>Policy SS10 also does not indicate prerequisite infrastructure without which the development should not be permitted to proceed. This risk development being committed by a neighbouring authority without making adequate compensatory provision for the host Borough.</p>	<p>SSP10 does little to ensure growth outside Swindon Borough boundaries is coherent and deliverable in a logical manner in relation to land at Tadpole Farm.</p> <p>We welcome Para 3.75 that cumulative impacts need to be considered. Policy SSP10 should make clear that strategy derives from a comprehensive assessment of opportunities and should identify prerequisite infrastructure, the absence of which should result in development not being permitted unless or until satisfactory mitigation.</p>

<i>Respondent Ref</i>	<i>Comment No.</i>	<i>Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
461		19	SSP11		<p>Therefore, this is not considered a location for new housing on delivery grounds. Locations for housing should have the potential to provide small to medium deliverable sites which can be independently delivered.</p> <p>The draft spatial strategy is heavily reliant on large urban extensions to meet housing requirements which is a risk if one or more fail to come forward. The objective of the Local Development Framework is not only about allocating sufficient land, but about ensuring deliverability of sites it allocates at the right time. Overall a DPD must be justified and effective and if an authority cannot demonstrate this, the plan should be found unsound.</p> <p>PPS3 requires local authorities to maintain a flexible and responsive supply of housing sites reflecting a plan monitor manage. Therefore, a clear policy approach with indicates the timing of potential housing sites is required. In addition to the 5 year land supply, PPS3 requires 6-10 and 11-15 year supply. In a recession, it is not unreasonable that some sites in the early years may not come forward due to deliverability. Therefore, to ensure a continuous supply of housing reserve sites are required.</p> <p>An overall masterplan should be developed to identify new housing sites around the urban area. Such locations should have the ability to deliver small/medium scale sites independently without significant prerequisite infrastructure. They should also be in limited ownership.</p>	<p>SSP11D should contain additional criteria.</p> <ul style="list-style-type: none"> - single or limited ownership - able to be developed without significant pre-commencement infrastructure - provide the required number of affordable dwellings having regard for early delivery <p>May also contain reference to preparation of several site masterplan.</p>

<i>Respondent Ref</i>	<i>Comment No.</i>	<i>Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
461	20	3.79	SSP11		Appeal on this site has been dismissed so at present there is a 750 dwelling shortfall. We question whether, for the reasons stated in the decision notice, including the impact on Coate Water and the negative impact on the regeneration of Swindon, this allocation should be progressed as part of the Core Strategy.	Policy SSP11 reworded to refer to the increased importance of reserve sites. Delete paragraph 3.79.
461	21	3.81-3.83	SSP11		We do not consider it appropriate to speculate that land at Kingsdown or further sites in Wiltshire should be allocated in the event of the need for additional or replacement allocations. Specifically land at Kingsdown was not considered to perform as effectively as an increase in the scale of growth allocated to Tadpole Farm and we do not believe that the Core Strategy should imply it might be considered as first reserve.	Paras 3.81-3.83 should be deleted.
461	22		SSP12		<p>Policy states vitality and sustainability of primary and secondary rural settlements will be improved. Rural settlements often do not have critical mass to support facilities and generate demand for new ones. Growth would offer settlements chance to improve shops, services and public transport and reduce the need to travel. This needs to be handled sensitively and sense of place maintained or enhanced.</p> <p>Primary and secondary settlements should be considered for limited expansion. Extent should be considered on a case by case basis taking into account characteristics of individual settlements.</p>	<p>Additional bullet point:</p> <p>- Limited extensions to the existing communities where this will assist in retaining existing or securing new community facilities will be permitted. The extent of any future growth to a settlement should be considered on a case by case basis.</p>

<i>Respondent Ref</i>	<i>Comment No.</i>	<i>Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
461		23	DMP1 (a)		Proposals for urban extensions at the Eastern Development Area and west of Swindon include areas which are in flood risk zone 3. We consider inadequate weight has been attached to this consideration and that consequently, there would be more sequentially preferable urban extension sites available.	SSP8 and SSP10 need to be amended to be consistent with DMP1 (a)
461		24	SSP8		<p>Density</p> <p>With regard to densities, it is important that the development is design led, not numbers led. In order to achieve 12,000 dwellings, an average density of 45 dph would need to be achieved. However, the EDA SPD designates large areas for low/medium density and therefore 12,000 dwellings are unlikely to be contained in the EDA boundary. Any remainder should be found in urban extensions elsewhere in Swindon</p>	
461		25	SSP8		<p>Transport</p> <p>Public transport should be the starting point of the scheme (see Vauban, Freiburg and Hammarby Sjostad as good examples) with priority on rapid transit linking locations in the EDA to the Town centre.</p> <p>Development pattern</p> <p>The extent and pattern of the EDA will exacerbate internal distances unless a coherent and attractive public transport system is available which integrates the development areas with the each other and the town centre. The cost of such may make the scheme less capable of delivery.</p>	

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461	26		SSP8		Road links A definitive costed and pragmatic model is required for incorporation into the final masterplan (potentially dismissing elements such as burying the A419 on cost grounds)	
461	27		SSP8		Green infrastructure Concern that network will be primarily meadow and support little biodiversity. Need to balance accessible and inaccessible open space to cater for community need. Pitches should not be in flood risk areas as, in flood event, this would put additional pressure on remaining pitches.	
461	28		SSP8		Location of essential infrastructure This should be located in areas not liable to flood. Development on land adjacent present flood areas could have a fundamental detrimental effect.	
461	29		SSP8		Provision of infrastructure Concern that critical infrastructure may not be in place at the right time. A tariff approach may not make the necessary contributions, particularly in the current climate. The policy as drafted does not make the difference between prerequisite infrastructure and desirable infrastructure whose absence would not inhibit delivery.	

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461		30	SSP8		<p>Delivery</p> <p>Tadpole farm was designated because of lack of environmental constraints. This is not the case with the EDA , a substantial part of while is prone to flood risk. This could impact on cost and therefore viability. There is not evidence the RSS tested the viability of the EDA and we strongly question the extent to which the EDA can deliver taking account of constraints and infrastructure costs and related funding sources.</p>	
462		1	CP3		<p>Although the Core Strategy recognises the importance of adopting a flexible approach to the provision of employment land as advocated in Draft PPS4 this is not adequately reflected in the draft policies.</p>	<p>Propose the following additional wording to Policy CP3:</p> <p>"..Key Employment Areas as shown on the proposals map will be protected for primarily employment B-Class uses and closely related uses not falling within a use class, I.e. sui generis, (such as warehouse clubs, cash and carry businesses and builders merchants) but which are commonly found in industrial estates."</p>
462		2	DMP3		<p>Policy DMP3 needs to be amended in line with Policy CP3 to represent a more flexible approach to uses within Key Employment Areas.</p>	

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464	1		SSP10		<p>Main concern for Wiltshire Council is with Policy SSP10. There has been joint working between the two Councils for delivery of 3000 dwellings, but there are concerns over the way this has been presented in the Core Strategy.</p> <p>A number of paragraphs and maps seem to identify the current preferred option. Although this has been consulted upon in the West of Swindon Update, Wiltshire Council do not consider this is advanced enough to be identified in Core Strategy Submission document. To identify the preferred site at this stage, which if found sound, will give this option too much weight prior to the full consultation and publication of Wiltshire's own Core Strategy.</p>	The Wiltshire Core Strategy is the correct DPD for addressing how the 3000 dwellings should be planned for.
464	2		SSP10		<p>There are a number of references in the text, including diagrams and maps, that could be seen to pre-determine the outcome of the West of Swindon work and may jeopardise identification of sites in the Wiltshire Core Strategy. The Key Diagram identifies the indicative area for the Urban Extensions in Wiltshire and this gives too much weight to a specific area i.e. the initial Preferred Option.</p>	At this stage, Swindon's Core Strategy should be referring to Area of Search 2C in the RSS and Map 2 Page 7 of the West of Swindon Study Update.
464	3	3	SSP2		<p>Para. 3.21 should stress that SBC and Wiltshire Council have and will continue to work to identify locations for these urban extensions. Para. 3.21 implies that the conclusions of the SSUE and West of Swindon Study Update represent the finished evidence base to identify the urban extensions) rather than one that is still evolving.</p>	Make clear that the West of Swindon Study Update, which should be read in conjunction with the SSUE, is still an early stage technical document. Although this is stated in the footnote at bottom of page 71, it should be placed in the main text to ensure that references to Ridgeway Farm/Moredon Bridge and Pry Farm are at this stage the findings of early stage work. If footnote remains, amend to 'consultation period February to March 2009.

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464	4	3	SSP2		The word ultimately should be removed from Para. 3.22.	Remove the word 'ultimately' from para. 3.22.
464	5	3	SSP2		Reference to River Ray Corridor running through all proposed developments removes any doubt over the initial preferred option.	Add the wording "may run through" to allude to the fact that the Corridor does not run through all options presented in the West of Swindon Study Update.
464	6		SSP5		Re Figure 13. The Urban Extension in Wiltshire (Indicative Area) seems to pre-determine the location of growth that is being consulted on as part of the work on the emerging Wiltshire Core Strategy.	At this stage the indicative area should reflect Area of Search 2C of the RSS or Map 2 page 7 of the West of Swindon Update.
464	7		SSP5		Re Figure 14. The Urban Extension in Wiltshire (Indicative Area) seems to pre-determine the location of growth that is being consulted on as part of the work on the emerging Wiltshire Core Strategy.	At this stage the indicative area should reflect Area of Search 2C of the RSS or Map 2 page 7 of the West of Swindon Update.
464	8		SSP10		In SSP10 specific requirements are listed for urban extensions which must be adhered to. First paragraph of SSP10 is supported. Second part appears to dictate requirements for development outside its area with little or no regard to the viability of the development (notwithstanding the fact that the principle of development has not yet been fully established through development plan process). There appears to be limited evidence to support these demands and without a full understanding of, for example, affordable housing requirements or highway improvements required it is difficult to see how sound evidence could be derived. Work is ongoing through the emerging Wiltshire Core Strategy to consider infrastructure requirements and the viability of any proposed development to the west of Swindon. SSP10 therefore appears unsound.	Emphasis should be more on collaborative and partnership working to deliver the housing whilst satisfying the objectives and infrastructure demands of both Councils.

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464	9	SSP10		Paras. 3.75-3.77 do highlight important infrastructure concerns that need to be addressed, but again it is phrased so to only meet the objectives of SBC. The only area where joint working is continually identified is education.	Would be better to expand on infrastructure requirements in general terms to identify what should form a successful urban extension. If the policy is to remain, based on recent discussions between the two authorities, criteria (v) and (viii) should be redrafted to reflect the following: (v) ensure that adequate primary school provision is made to meet the demands generated by the urban extensions to Swindon within Wiltshire. (viii) SBC will work jointly with Wiltshire Council to deliver appropriate secondary education provision to meet demand generated by the cumulative impact of the urban extensions to Swindon within Wiltshire and at Tadpole Farm.
464	9	SSP10		Identifying the important transport links between north and west presumes that the preferred option forms the location, whereas if a location toward the southern part of the area of search were eventually taken forward, transport links to the southern part of Swindon Urban Area could be the key transport link.	The aims of SSP10 and paras. 3.75-3.77 may be better served by taking a more general manner.
464	11	App6		Appendix 6 - Should be removed. It prejudices on-going work being undertaken to identify strategic sites within the emerging Wiltshire Core Strategy.	This Appendix should form part of a background paper, or links in the text to the West of Swindon Study Update could be used to give the same information.
464	12	CP10		CP10 - Some of the Strategic Green Corridors clearly need the co-operation of Wiltshire Council and other surrounding authorities. While partnership working with North Wessex Downs Partnership is referenced, it is not clear whether working with surrounding authorities has been undertaken as this is surely a key part of safeguarding any green corridors.	

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464	13	2.147	CP10		Great Western Community Forest lies within the area of search for the West of Swindon urban extensions); this is not reflected in this paragraph.	It may be prudent to include some reference to this to prevent any surprises later on.
464	14	2.158	CP10A		Although it will probably be the case that the canal route will be safeguarded if it forms part of an urban extension, there should be reference to SBC working with Wiltshire to mitigate/safeguard future canal proposals that may be affected by an urban extension.	
464	15	2.163	CP11		This should say something about joint working being undertaken between SBC and Wiltshire Council to deliver sites for travelling showpeople.	
464	16	2.165	CP11		Should have a reference to joint working on Travelling Show People.	
469	1		SSP1		Need for a new approach to Blunsdon to rebuild the character of the villages functions due to the bypass and Tadpole Farm development.	Change policy SSP1 to: 1. Allow for a residential extension on the Hills land to the west of the old A419 up to its new route and to include this site as alternative urban extension. 2. To allow for the above change in relation to the specific opportunities that have arisen following the Blunsdon bypass. By allowing new development in Blunsdon, beyond just the "rural need" will assist in creating a more balanced community, with new affordable homes, following the bypass. Alternatively define whether " rural need" can include cases of this nature.
469	2		SSP11		There is an opportunity to alter new development on the western edge of the village up to the new A419 as an "other urban extension".	

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471	1		SO2		Fully support the provision of necessary infrastructure to support growth including the inclusion of provision of Fire and Rescue Service infrastructure as key infrastructure in the various development areas.	
471	2		SO9		Supports SO9, however there is no mention within the identified monitoring indicators of Fire and Rescue Services or of the other emergency services.	States the following National Indicators should be included in SO9: NI 33 arson NI 47 Road Safety NI 48 Road Safety NI49 Fire Safety
471	3		CP1		Strongly supports this policy and in particular the reference to the need for "timely investment in infrastructure".	
471	4		CP2		Fully supports this policy, in particular subsection (ii). However concern is raised about the deliverability of develop contributions through the current site specific/section 106 method for delivering planning obligations.	Paragraph 2.9 should include Fire and Rescue Infrastructure.
471	5	2.11	CP2		Welcomes identification of Wiltshire FRS within the list of partners contained in paragraph 2.11 and suggests Wiltshire FRS is not identified under the emergency services within 2.13 because it has already been named in paragraph 2.11.	
471	6	2.15	CP2		Welcome the proposal for a comprehensive SPD on developer contributions as specified in policy DMP2.	

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471	7		CP7		Support for this policy in principle, however SBC should have regard to the fact that attending road traffic collisions is a significant part of the emergency response work of Wiltshire FRS. Hence, there should be sufficient evidence to indicate that emergency response times will not be delayed due to increased congestion on the roads.	The Core Strategy should include detailed transportation evidence which includes the appropriate actions to ensure that there will not be a rise in the number of road traffic collisions and there will not be a rise in congestion on the roads delaying response times.
471	8		CP9		Re-enforce the inclusion of Wiltshire FRS as an integral part of community provision in paragraph E. However for Wiltshire FRS to deliver the fire rescue service infrastructure it will be necessary for Wiltshire FRS to receive developer contributions or other sources such as grant funding.	Paragraph E should be amended to read: "The emergency services will be enabled to retain an efficient and effective service, to include their community functions . . ." As well, a reference should be made regarding the funding required to deliver additional health and community provision necessitated by growth.
471	9	2.132	CP9		SBC should be aware that the Community Risk Strategy will need to be reviewed and updated in the future in parallel with the finalisation of the Core Strategy	Reference should be made to the need to update and review the Community Risk Strategy for Swindon Borough.
471	10	2.134	CP9		Paragraph 2.134 is fully supported by Wiltshire FRS.	
471	11		SSP4		States Policy SSP4 has full regard to the proposed developments contained therein in producing its Community Risk Strategy documents.	

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471	12	SSP5		Supports the principle of this policy and in particular paragraph H & G. However the incorrect plan reference is given and the requirement for a new fire station in the Southwest should read Southeast.	Paragraph H should be reworded as follows: "new fire stations will be provided to the northeast and southeast of the town to provide community focused fire and rescue services and meet emergency response times within the Areas of search defined on Figure 13. Westlea fire station will be upgraded to a whole time fire station. It is intended that . . . "
471	13	SSP5		Comments relate to Figure 13: Suggests the omission of the Commonhead Roundabout from the EDA boundary will effectively rule out the possibility of locating the required new southeast fire station within the EDA and the area of search should be modified accordingly on Figure 13. This places greater importance on identifying an alternative site. Indicative area of search for the northeast fire station is acceptable.	Area of search for the southeast station should be moved southwards to centre on commonhead (shown on a map on page 8 of representation). As well the labels for Drove Road Fire and Ambulance stations should read Swindon Central Fire Station and Queens Drive Ambulance station.
471	14	SSP6		Wiltshire FRS support this policy	
471	15	SSP7		Due to the modification of the EDA boundary, this policy should make reference to locating a new fire station at Commonhead and make appropriate provision for a new fire station.	Additional new paragraph (v) be added to this policy to read: "safeguard circa 0.4 hectares of land in the northern part of the site for a new fire station and associated facilities"
471	16	SSP8		Due to the modification of the EDA boundary and providing it is possible to provide a new fire station at Commonhead, paragraph (xiii) should be deleted. In relation to paragraph D (iii), Wiltshire FRS strongly support the proposal to levy a tariff or similar arrangement for the EDA in order to facilitate phased infrastructure provision.	Subject to modification of Policy SSP7 to safeguard land for a new fire station at Commonhead, paragraph (xiii) should be deleted.

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471	17	3.71	SSP8		Wiltshire FRS endorses the identified need for a separate 106 tariff for the EDA, however developer contributions should cover off site provisions of infrastructure.	Additional bullet point be added to 3.71 to confirm that developer contributions from the EDA are to cover on and off site infrastructure.
471	18		SSP9		The development of Tadpole Farm is instrumental in the requirement for Westlea fire station to be upgraded to 24hour whole time. If upgrade does not take place then response standards will not be met.	Amend policy to identify the need for developer contributions to fund the upgrade to Westlea fire station to a whole time 24hour station.
471	19		SSP10		Developer contributions will be required from the West of Swindon Urban Extension to provide additional infrastructure in terms of fire and rescue service.	Policy be amended to identify the need for developer contributions to fund the additional fire and rescue infrastructure that will be required due to this urban extension.
471	20		DMP1		Due to the proposed major developments, the technical fire safety establishment for Wiltshire FRS will need to be increased.	The inclusion of a paragraph identifying the technical fire safety workload workforce requirements of Wiltshire FRS.
471	21		DMP2		Wiltshire FRS fully supports this policy. However Wiltshire FRS would like to make SBC aware that as well as capital costs of providing new infrastructure, there is expected to be a need for funding revenue costs associated with setting up new fire and rescue service infrastructure.	Amend the policy so that: 1. Contributions cover both on and off site infrastructure that will be necessitated by the new development. 2. Any future tariff of section 106 contributions towards fire and rescue service infrastructure will need to provide revenue costs associated with set up of new infrastructure.
471	22	4.23	DMP2		Welcomes the inclusion of emergency services within paragraph 4.23 however reference should be made to Wiltshire FRS.	Add specific reference to Wiltshire FRS
471	23		DMP3		Supports the restrictions on change of use for employment areas.	

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471	24	4.71	DMP7		Fire and rescue service fire stations are essential community facilities and therefore should be afforded protection and support from this policy, however this is not reflected in paragraph 4.71.	Add specific reference to Wiltshire FRS within the list of community facilities set out in paragraph 4.71
471	25		App2		Appendix 2: Welcomes the inclusion of the Community Risk Strategy as an evidence base document	
471	26		I & M Plan		Sections 2 & 3: Welcomes the inclusion of both S106 agreement and CIL as part of its implementation and delivery strategy and endorses the inclusion of both capital and revenue funding.	
471	27		I & M Plan		Section 4: Policy is supported however there is no specific mention within the identified monitoring indicators of Fire and Rescue Services.	The following indicators should be included: NI 33 arson NI 47 road safety NI 48 road safety NI 49 fire safety
471	28		I & M Plan		Section 5 & Subsection 1: Supports the key infrastructure requirements, however the extension of Westlea fire station is a fundamental part of the overall service delivery plan.	The addition of the Westlea fire station extension to the key infrastructure list and add to timeline.
471	29		I & M Plan		Section 5 and Subsection 2: Swindon Central Fire Station will be relocated or co-located within the central area. This move will release additional capital or fund additional infrastructure. Therefore this merits it's inclusion within the Key Infrastructure requirements for central Swindon.	Addition of a relocated or co-located 2 bay fire station on a suitable site within central Swindon in the key infrastructure requirements and add to timeline.

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471	30	I & M Plan		Section 5 & Subsection 3: Fully supports this section and notes the expansion of emergency service provision within the scale and type of development. However there are issues over the timelines for the two new fire stations.	Clarification on the timeline is needed as different timelines within the Key Infrastructure and Borough wide growth graphs.
471	31	I & M Plan		Section 5 and Subsection 4: Due to the change to the EDA boundary a fire station is not required in this location.	Remove the fire station search area from the key infrastructure Requirements for the EDA
471	32	I & M Plan		Section 5 & Subsection 5: Due to the change to the EDA boundary, a fire station will be sought in Commonhead area.	Add southeast fire station in the Key Infrastructure Requirements and timeline.
471	33	I & M Plan		Section 5 & Subsection 7: Wiltshire FRS supports this section	
471	34	I & M Plan		Section 5 & Subsection 7: The development of Tadpole Farm will require Westlea fire station to be upgraded to 24hour whole time and has been identified as requiring developer contributions.	This section should identify the need for developer contributions to fund the upgrade of Westlea fire station to a whole time 24hour fire station.
471	35	I & M Plan		Section 5 & Subsection 8: This development will require Westlea fire station to be upgraded to 24hour whole time and has been identified as requiring developer contributions	Addition of the extension to Westlea fire station to a 24hour whole time station within the Key Infrastructure Requirements and the appropriate timeline.

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471		36	I & M Plan		Annex 1: Welcomes the inclusion of the two new fire station and extension to a third within Table 2, however there is no mention of providing a central fire station once the existing site has been vacated. Costs may need to be updated as the Core Strategy progresses. No allowance has been made within Table 2 for revenue costs associated with setting up an additional fire and rescue service. Wiltshire FRS would like to reserve its position on agreeing the funding split (Table 2) for new fire and rescue service infrastructure until further clarification to support it is provided by the Council.	<ol style="list-style-type: none"> 1. Addition of the Central fire station cost of circa £937,000 to Table 2 2. Cost figures should be updated 3. Provision in Table 2 for revenue costs associate with setting up a new fire and rescue service infrastructure 4. Clarification is required from Wiltshire FRS to support the proposed funding split.
476		1	CP3		SCC has concerns over parts of the overall approach to economic development. As economic conditions improve it will be essential that sufficient employment land should be available to allow for choice and flexibility.	
476		2	CP3		Provision of an additional 55ha on top of the 105ha commitments figure (total 160ha) would not be sufficient to meet the higher growth scenario of 200ha. Given that Swindon is a major driver in the regional economy it would be insufficient to provide for lower growth scenarios.	SCC would support provision of at least 200ha. This would require an additional 40ha of employment land to be identified.
476		3	CP3		SCC consider that a more positive approach should be promoted in the rural areas of the Borough. There will, for example, be more opportunities for discreet small scale new development to aid diversification of the rural economy and provide local jobs that cannot be created by rural building conversion alone.	Adopting a more positive approach towards rural areas in the Borough.

<i>Respondent Ref</i>	<i>Comment No.</i>	<i>Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
476	4		CP4		SCC support the principle of meeting the draft South West RSS dwelling provision in full.	
476	5		CP4		At the present time there is not a 5 year supply of deliverable land. Failure to do so is contrary to National Policy PPS3. The housing land trajectory and its components are fundamentally flawed and unsound as they are based on over ambitious start dates and completion levels, e.g. EDA.	
476	6		CP4		Over the long term job growth has outstripped the growth in the economically active residents in the indigenous population, so therefore a high level of new homes has been needed to provide the workforce as a result of economic growth. There is a record of labour and skill shortages in the town and a history of extensive daily commuting to work from well outside the town. Failure to deliver the required number of new homes and in the needed delivery profile will severely hamper economic performance. Failure to address this matter through the housing allocations and the subsequent delivery profile would undermine the Core Strategy.	
476	7	C	CP4		Part C is very much supported for the reasons specified at paragraph 2.45.	
476	8		CP6		SCC welcomes that positive provision is being made towards education at all levels as it is essential to support the local economy. A university at the town would provide a major stimulus to economic growth in the town.	

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476		9	CP6		Bearing in mind Swindon's track record of economic performance and history of labour and skill shortages, it is felt that inadequate priority has been afforded to the needs of both Further and Higher Education in the Core Strategy.	
476		10	SSP1		SCC supports the policy approach subject to the definition of "local rural needs" in point C.	
476		11	SSP3		Additional land will need to be allocated to meet the higher forecast growth scenario.	Additional land will need to be allocated to meet the higher forecast growth scenario.
476		12	SSP11		<p>SCC notes that the policy intention is to "provide a security of supply over the long term", however Swindon does not have a five year supply of deliverable housing sites. There is a need to release additional land in the short term.</p> <p>SCC are confident that suitable alternative sites exist to ensure early and consistent delivery of housing at small scale urban extension sites around the North, West and East of the town which the evidence base has failed to correctly identify and prioritise.</p>	
476		13	DMP3		In general terms SCC support the approach to the key employment areas.	
476		14	DMP3		SCC notes that a number of non B class uses can co-exist in employment areas without causing unacceptable impacts on vitality and viability.	Cheney Manor should be identified as an "other employment area" under the 2007 Employment Land Review. The estate is ageing and as the Review points out it would "benefit from upgrading".

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476		15	SSP8		A significant amount of the EDA is within the functional floodplain. The Strategic Flood Risk Assessment, which forms part of the Evidence Base, does not appear to have given any consideration to flood risk to the East that gives any degree of comfort. This work does not include any comparative assessment of the alternatives (i.e. the sequential test) and leaves it in conflict with National Policy PPS25 and it's companion documentation.	
476		16	SSP8		In order to escape the flood plain, there will be a series of 'development islands'. A number of these islands are extremely remote from the main body of the urban area and particularly the town centre.	
476		17	SSP8		SCC are very concerned that a large district centre, providing for both convenience and comparison shopping, will have a major negative impact on the town centre by drawing trade away. This fear is compounded by the general location of such a facility next to the A419 Trunk road, presumably to attract passing trade and to make the retail centre a destination in its own right. This would bring the Core Strategy into direct conflict with the priority of central area regeneration, contrary to national planning advice in PPS1 and PPS6. The ability to integrate the EDA with the East of Swindon urban area is difficult due to the existence of the A419. It is likely that the EDA will function as a separate entity with little physical integration.	

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476	18	SSP8		The A420 is a strategically significant road for long distance traffic (south west-midlands). The proposals do not address satisfactorily these movements, and as they stand both strategic and local traffic would share the already congested network, before 12,000 dwellings are built.	To address this a strategic link around the EDA from the A420 to the A419 junction at Commonhead could be built. This would provide ease of access for strategic traffic bypassing the town and free up capacity at the White Hart junction. This would also avoid the potential for roads within the EDA to be used as a "rat run".
476	19	SSP8		<p>SCC are concerned with the deliverability of the site, particularly the extensive housing element. There is a risk that the first phase of the EDA is built and later phases are not due to the extensive infrastructure costs associated with the floodplain.</p> <p>It is understood that the EDA cannot proceed without extensive public sector funding, and this causes concern in the present economic climate for the early or complete delivery of the EDA. If public funding cannot be found, SCC are concerned that the delivery of new homes for Swindon's workforce will be delayed for a considerable time, and this would be contrary to the aims of RSS and Core Strategy.</p>	
476	20	SSP8		The delivery of 12,000 houses in the EDA is highly and unrealistically optimistic. There is no evidence base to confirm that the housing trajectory can be achieved.	The NDA (10,000 homes) averaged completions of 636 dwellings per annum (compared to the projected 1,000+ in the EDA), which we would conclude is a more realistic level for a normal and typical major development, and would be highly ambitious for an area with such high infrastructure costs (due to the floodplain).

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485		1	SSP8		Prime Ministers Question Time in the House of Commons 3 June 2009: Prime Minister said unequivocally that it was Government Policy to build on brownfield sites, not greenfield sites. Swindon Borough Council contradicts this with the EDA, an area which has been given the highest floodplain classification. The Core Strategy is fundamentally flawed.	
485		2	SSP8		<p>The Core Strategy is not founded on a robust and creditable evidence base since important infrastructure has not been identified, particularly transport. Reasonable alternatives have not been explored. Examples include:</p> <p>1) EIP recommended that development east of Swindon is not an appropriate direction without fully exploring alternatives to the west of Swindon.</p> <p>2) Having been confirmed by the MOD, the closure of RAF Lyneham has been given no consideration in the Swindon sub-regional assessment. It fails to consider this reasonable alternative.</p>	
485		3	SSP8		The scale of the EDA is such that an Area Action Plan is warranted in line with national planning guidance. This legal requirement would ensure that this significant development is examined in detail by an inspector at a proper planning enquiry.	The EDA should be subject to an Area Action Plan and thus examined in detail by an inspector at a proper planning enquiry
485		4	SSP8		The proposed district centre in the EDA will inhibit if not completely destroy the viability of town centre regeneration and revitalisation. Evidence put forward by EIP and Swindon Chamber of Commerce agrees with this.	

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485		5	CP7		<p>There is no justification in the public domain for a rapid transit network. There are no proposals for coping with the increased traffic on the A420/A419/M4 link as shown in the year by year historical traffic records - even before the impact of 12,000 homes.</p> <p>This was based upon the Swindon Transport Strategy 2009 - there was no evidence base or public consultation for this from neighbouring authorities which are affected, particularly Oxfordshire who have expressed a concern for the impact of the EDA.</p>	
485		6	CP8		<p>No reference made to the potential archaeological remains in the EDA. The Association of Roman Archaeology is on record as saying that the whole EDA area is scattered with "sites of all eras from Neolithic to Bronze, Roman, Saxon and Medieval" including a "huge Roman town".</p> <p>These need to be investigated to ensure they are protected in a major urban expansion.</p>	
485		7	CP10		<p>No mention of the identification of the habitat of rare/protected species and no proposals therefore for safeguarding them as required by statute.</p>	

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492		1	SSP8		In its 'Notes to Accompany Representations' form SBC identifies two relevant elements: (1) Participation by the local community and 'others having a stake in the area'. The latter are not identified, but are taken to include development companies and others who control land in the area affected. (2) The choices made in the Core Strategy are backed up with facts. The Core Strategy fails on both counts.	
492		2	SSP8		To be effective local participation requires not only that local communities shall offer views on proposed policies, but also that SBC shall consider those views genuinely and objectively. On this the Council has signally failed to deliver. Nowhere in the Core Strategy is there any indication that SBC is even aware of widespread opposition to SSP8, not only in the villages, but also in urban areas of the town such as Stratton, Covingham and Dorcan. The latter will be directly affected by the traffic which the Core Strategy seeks, deliberately, to attract from the EDA, if built, into the centre of Swindon (para C iv)).	
492		3	SSP8		Western Vales Villages Consortium has been concerned to preserve the character and separate identities of its constituent villages. The CS pays this lip service (see para C iii); para 3.64), but the reality is different. Figure 16 shows the proposed development blocks physically impinging on outlying parts of Lower Wanborough, and extending up to the Borough boundary in the direction of Bourton. This follows repeated assurances that the character and integrity of these places, among others, would be secured.	

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492		4	SSP8		Officers have sought to justify the CS proposals by arguing that SBC consultants recommend that future development should be located where the CS shows them, and that regard must be had to those recommendations. They have also contended that it is in any event the responsibility of planning authorities in Oxfordshire to safeguard Bourton by adopting appropriate planning policies. This is both disingenuous and wrong.	
492		5	SSP8		SBC may be bound to take account of its consultants' views, but is not obliged to follow them slavishly, especially where this would result in breaching of undertakings which were at least accepted in good faith. Further, it is arguable that the giving of those undertaking created a legitimate expectation in law that they would be honoured. To suggest that Oxfordshire authorities are responsible for protecting the character and identity of Bourton negates SBC's responsibilities as the promoter of the EDA, and is irreconcilable with the pious promises made in para 3.64.	

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492		6	SSP8		There are four facts which SBC has been unable to overlook entirely, and which are inescapable. These are: (1) the EDA is severed from the rest of Swindon by the A419 trunk road, a major physical and psychological barrier (para C iv)); (2) the area floods seriously and increasingly often (para C ii)) and has been found to be of all possible expansion sites the one at greatest risk of flooding; (3) the highway network surrounding the proposed EDA is already overloaded, particularly the A420 and M4 J15 and; (4) the proposed EDA is closer to the Wessex Downs AONB than any other area in which Swindon could expand.	
492		7	SSP8		WVW repeats their conclusion that the draft RSS and SSP8 (which derives from the RSS) are fundamentally misconceived. Put another way, there are no facts to support SSP8, and many to refute it.	If major expansion of Swindon is to occur at all, it should do so elsewhere.

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492		8	SSP8		The CS purports to meet the difficulties raised by the four facts with a series of assurances, none of which is backed up with practical suggestions. An example of this is para 3.61. There, SBC claims to be '... keen that the EDA is of exemplar design and quality, and where possible incorporate innovative and sustainable features'. Whether this is more than empty rhetoric can be tested against the Council's record in securing good design in the areas of the town built since major expansion began in the 1950's. That record has been lamentable, as even a brief tour of those areas will reveal. The quality of housing currently emerging at Wichelstowe further attests the continuing inability of SB to guarantee high quality design in major new schemes. The prospects for the EDA are dispiriting.	

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SSP8

It has been apparent since the RSS was first formulated, and remains true, that the costs of highway improvements, removal of flood risk, and open space provision, among other things, will be enormous. It is increasingly clear that SBC has never had, and still does not have, the remotest idea of how the infrastructure costs of the proposed EDA are to be met. Central Government bodies such as the Highways Agency, and utilities suppliers such as Thames Water, made it plain at the EIP into the RSS that they have no funds for the purpose. In its Transport Strategy SBC admitted that it would be unable to extract enough money from commercial developers to finance even the limited number of crossings of the A419 trunk road which the CS proposes. Although repeatedly urged to indicate where the necessary money for any of the infrastructure costs might conceivably be found, SBC has been wholly unable to do so. The inescapable conclusion is that SSP8 is wholly ineffective in this respect.

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492

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SSP8

It is of interest that in 1999, following a careful study of many possible sites for future expansion of the town, the Swindon Development Appraisal concluded that development of 6,000 dwellings (half the size of the EDA) would be too large to integrate successfully with the rest of the urban area, including the town centre. In the decade which has since elapsed the only material fact which has changed is that traffic on the A419 has increased substantially. This has increased the difficulty and cost of providing links across that road. The vacillation in SBC's views cannot be the result of valid planning considerations, but has been brought about by irrelevant political pressures.

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SSP8

SSP8 contravenes many national planning policies. One needs to look no further than PPS1 for confirmation of this, where paragraphs 1 and 4 both point out the importance of conserving and protecting the environment. SSP8 proposes the covering of several hundred hectares of unspoilt country with bricks, concrete and tarmac, close to an AONB.

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492		12	SSP8		PPS1 para 20 emphasises the importance of flood risk and the provision of infrastructure, and this is reinforced by the existence of PPS25, devoted to flood risk. PPS1 para 23 states that 'Planning Authorities should... (viii) ENSURE THAT INFRASTRUCTURE AND SERVICES ARE PROVIDED to support new and existing economic development and housing' (emphasis added). By continuing to promote the EDA, knowing that there is no assurance that any money will be available to provide the necessary infrastructure, SBC is acting in direct breach of both policies.	
492		13	SSP8		PPS1 para 40 stresses the importance of community involvement in planning and the achievement of sustainable development. This should involve more than informing local communities of what is intended, purporting to listen to their concerns, and ignoring them. The preparation of the CS is accordingly in breach of this element of national policy.	
492		14	SSP8		SBC concedes that its proposals must have the support of 'delivery partners who are signed up'. It is assumed that this refers not only to commercial developers but also to providers of utilities and other infrastructure required for the proposed EDA. It is evident that no such provider has agreed in principle to play its part in the future development, still less signed up to do so.	

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492		15	SSP8		The CS is not coherent with the strategies of either of the neighbour authorities, Oxfordshire CC and the Vale of the White Horse DC. Both objected in the past to the concept of the EDA, for differing reasons, and have not (so far as WVV is aware) withdrawn their objections. By abandoning responsibility for providing strategic gaps between the proposed urban development and the villages, leaving this to the Oxfordshire authorities, SBC has contravened its own guidance.	
492		16	SSP8		The CS gives no clear indication of who is to implement its policies. This is not surprising, given the absence of any infrastructure funding and of any practical proposals for solving the problems which the EDA will create.	
492		17	SSP8		It should not be forgotten that the Secretary of the State has not approved the RSS. Each successive attempt by SBC to pre-empt that decision succeeds only in demonstrating the wisdom of proposing the EDA and the impossibility of achieving what the CS intends.	
503		1	SSP7		Support the proposed allocation of 750 dwellings. However Commonhead has been recognised by the Sops to be a location which is highly sustainable. Thus, the Partnership object to the failure of the plan and SSP7 to make full and effective use of the location as an urban extension whilst safeguarding areas and views of Coate Water Country Park.	

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503	2		SSP7		A larger scheme at Commonhead can help deliver necessary development in sustainable locations and create opportunities to improve the character and quality of the area.	
503	3		SSP7		The Partnership object to the failure to allocate 1450 dwellings in policy SSP7 with necessary supporting facilities and associated buffer and other community uses. Please see attached plan with the representation.	
503	4		SSP7		The Partnership consider the policy, as drafted, to be unsound and requires a further minor change as the current wording is not consistent with national policy, effective or properly justified	
503	5		SSP7		Policy SSP7 as drafted, does not represent the most appropriate option for inclusion in the Core Strategy to guide the future development of land at Commonhead.	
503	6		SSP7		The Partnership endorses the broad thrust of the document and the efforts made by the Council to progress the Core Strategy.	
503	7		SSP7		The Partnership consider that the underlying objective of the allocation is broadly sound and is capable of revision to reflect national and emerging regional policy.	
503	8		SSP7		The Partnership seek to enhance the overall soundness of Policy SSP7 and the Core Strategy, through the changes to the policy wording for the reasons elaborated upon in this objection and associated supporting background material.	

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503		9	SSP7		Land at Commonhead is currently allocated in the Local Plan, under Policy DS3. This policy has been saved by the Sops. Policy DS3 has been subject recently to appeal which was dismissed. However, the details of the Environmental Assessment which was undertaken for the appealed applications and detailed negotiations were accepted by the Sops. This secured extensive common ground between the applicants and the Council.	
503		10	SSP7		The Council and others have consistently acknowledged the suitability and sustainability of land at Commonhead for development. Please see Inspector's Report para 458 and Sops decision para 14).	
503		11	SSP7		The Partnership have consistently and strongly objected to the suggested reduction in the extent of the Commonhead allocation, as shown in the Preferred Options document and sought continuation of Policy DS3.	
503		12	SSP7		In light of the appeal decision at Commonhead, it is therefore necessary to review the master plan at Commonhead to address the limited concerns identified by the Sops and to remove the university campus elements. The Partnership are currently revising the master plan for Commonhead to overcome the concerns of the Sops. The Partnership seek to work with the Council to formulate an appropriately revised master plan for the site.	

<i>Respondent Ref</i>	<i>Comment No. Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
503	13	SSP7		It is estimated that the revised scheme will have a development capacity of 1,450 dwellings. The master plan will make full and effective use of the land at Commonhead to accommodate a residentially led mixed use urban extension on a highly sustainable location. It will seek to improve the character and quality of the area including Coate Water Country Park. It will also include a University health facility for the GWH.	
503	14	SSP7		The policy construction is inappropriate and inconsistent with the approach taken in the Core Strategy at the EDA and Tadpole Farm.	Reference to 'north and east' of Day House Lane should be omitted from the policy. The wording is incorrect as land is allocated on the Core Strategy Proposals Map south and west of Day House lane.
503	15	SSP7		There is inconsistency between the Proposals Map and Fig 15. The Partnership considers that additional land is readily available and suitable for development to the west which is already allocated under Policy DS3.	
503	16	SSP7		The Partnership notes that the specific policy requirement to provide affordable housing at Commonhead has been omitted from the policy. It is assumed that the omission is not intentional as the policies for both the EDA and Tadpole Farm include references to affordable housing.	

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503		17	SSP7		The allocation should make provision for a primary school or equivalent 2 forms of entry, including pre-school nursery to serve a development of approx 1450 dwellings. Furthermore the development should also make appropriate contributions to the delivery of enhanced new secondary school facilities	
503		18	SSP7		The revised proposals will include employment, sustainable transport links, neighbourhood centre, school, university health care facility and Hospital Extension of 5.5 hectares. An appropriate scale and range of formal and informal sport, leisure and recreation areas, commensurate will also be included.	
503		19	SSP7		The revised scheme will protect and mitigate the impact of development upon archaeological features and respect views from the AONB and Coate Water Country Park	

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503	20	SSP7		The Partnership consider that a revised scheme at Commonhead would be the most appropriate option for inclusion in the Core Strategy. The scheme will address the limited concerns of the Sops and make efficient and effective use of this location for development.	<p>Change Sought to Core Strategy</p> <p>Alternative Policy SSP7: Commonhead</p> <p>Provision will be made for a mixed use urban extension of about 1,450 dwellings at Day House Lane, Commonhead.</p> <p>Proposals for development at Commonhead must:</p> <ul style="list-style-type: none"> i) Provide at least 35% affordable housing at a tenure mix in accordance with CP4: Housing ii) Incorporate a 'design led' approach to density which provides a mix of higher and lower densities to achieve a net average density of a least 45 dwellings per hectare iii) Provide the equivalent of 1 new Primary school or 2 Forms of Entry on-site to meet demand including provision for nursery/early years facilities. iv) Make appropriate contributions towards the delivery of additional Secondary school facilities at either a new or existing Secondary school to meet demand generated by the proposed development. v) Provide about 15 hectares of B-class and non B-class employment land in accordance with Policy SSP3: Distribution of Employment, which complements and does not compete with Swindon Town Centre vi) Safeguard about 5.5 hectares of land for the future expansion of the Great Western Hospital, to the west of the

<i>Respondent Ref Comment No. Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
				<p>hospital, adjacent to the existing hospital site.</p> <p>vii) Provide sustainable transport links, including public transport enhancements, to the existing urban area and Swindon Town Centre.</p> <p>viii) Provide a neighbourhood centre including retail facilities appropriate to meet local need and community facilities and other uses appropriate to a mixed use neighbourhood centre.</p> <p>ix) Provide an appropriate scale and range of formal and informal sport, leisure and recreation areas in accordance with Policy DMP8: Green Infrastructure Principles.</p> <p>x) Protect, enhance and integrate features of natural, historic and environmental importance, including mitigation measures as necessary including: <ul style="list-style-type: none"> - Archaeological features at the Schedule Ancient Monument area and other known and potential archaeological remains. </p> <p>xi) Create a robust functional buffer to Coate Water Country Park.</p> <p>xii) Respect views from the North Wessex Downs AONB and Coate Water Country Park and minimise the impact on the landscape character of the area.</p> <p>Alternative Supporting Text to Replace Existing Paras 3.57 – 3.60</p>

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503	21		Introduction		Paragraph ii) requires updating to reflect the latest position on the RSS.	Paragraph ii) needs updating
503	22		Fig1		The timetable in Figure 1 needs updating to reflect the current position with the Core Strategy.	Figure 1 to be revised
503	23		Spatial Vision		In light of UWE's rejection of the North Star site, allocated in the CAAP. The proposals to such University at North Star are no longer robust. There is no evidence of any other viable university proposals with appropriate funding. The vision needs to allow flexibility to enable the University to be located elsewhere, for example a medical facility with the GWH.	That the Spatial Vision be updated to delete the reference to the University in the Town Centre
503	24		CP1		The Partnership seek a minor change to Policy CP1	Paragraph A should refer to timely and 'phased' investment in infrastructure Paragraph C should be revised to refer to 'new development at Swindon' and not 'in' Swindon as the requirements of Policy CP1 apply equally to redevelopment sites in the urban area and the strategic and non strategic urban extensions, including the EDA, Commonhead and Tadpole Farm.
503	25		CP2		The provision of infrastructure should be fair and reasonable and in accordance with Circular 05/05 and provided on a timely, phased basis. The Partnership note that paragraph I seeks infrastructure and services to support existing housing and to meet the needs of the community. However, the Council can only require contributions which have a direct impact on infrastructure requirements. It is also important that the demand for contributions does not have an adverse impact upon the viability of a scheme.	Policy CP2 be subject to further minor change.

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503		26	CP3		There is a unique opportunity to provide a Health Care Facility, which has to be associated with the GWH and cannot be located in the TC. Thus, would not undermine any future town centre campus. The Partnership seek the opportunity to discuss the potential inclusion of the health care facility at Commonhead. The facility will attract investment at Swindon and new employment.	
503		27	CP3		The specific reference to a new University in Central Swindon should be amended, in light of UWE's rejection of the North Star site. A more flexible policy wording is required to facilitate and establish a University presence at Swindon	Policy CP3 be revised.
503		28	CP3		Policy CP3B needs to be considered in the context of the proposed employment allocation at Commonhead. The relationship between B and E should be explained. Whilst Paragraph E should be more specific in terms of how the additional 55ha of employment land will be identified at the urban extensions. A cross reference to policy SSP3 would be helpful and offer clarity.	Policy CP3 be revised
503		29	CP4		The Partnership support the provision of 34,200 dwellings at Swindon, including 33,000 in the urban area.	
503		30	CP4		The partnership object to the density requirements and repeats policy H2 of the draft RSS.	
503		31	CP4		The Partnership seek greater flexibility in the design process for Commonhead and other developments rather than having to address a rigid predetermined average minimum density.	

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503	32		CP4		There is inconsistency between paragraphs B and C.	
503	33		CP4		With reference to the affordable housing target of 35%, it is even more vital to secure the timely delivery of affordable housing at Swindon. New development at Commonhead offers the Council the opportunity to secure important additional affordable housing including key worker housing for the hospital and other services through a revised allocation.	Policy CP4 should be revised.
503	34		CP4		The dwelling provision at Swindon SSCT may be subject to further changes because the RSS is yet to be finalised. However, the proposed changes to the RSS constitute a reasonable basis upon which to progress the LDF.	
503	35		CP4		Welcome the acknowledgement in the paragraph (2.41), and in the draft RSS, that it is not possible to find all RSS requirements within the urban area and thus a number of greenfield urban extensions are proposed in the CS. Furthermore, the release of greenfield sites does not reduce the need to ensure best use of pdl opportunities in Swindon, particularly in the Central Area.	
503	36		CP4		The recent under performance during the recession will also impact upon the robustness of the assumptions.	Final sentence of paragraph 2.41 be deleted.
503	37	2.47	CP4		Paragraph 2.47. The partnership object to the density requirements and repeats policy H2 of the draft RSS.	

<i>Respondent Ref</i>	<i>Comment No.</i>	<i>Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
503	38	2.47	CP4		The penultimate sentence of the paragraph (2.47) should refer to 'local landscape or townscape' considerations. The phrasing of the last sentence is unclear.	Paragraph 2.47 be subject to minor change
503	39	2.50	CP4		The Partnership seeks a minor change to paragraph 2.50. The evidence base set out set out in the Housing Market Assessment supports 30% and does not support 35% sought in RSS10. The precise scale and nature of affordable housing provision is a matter for negotiation, having regard to need and demand evidence, overall financial viability and other considerations at the time of determination.	Paragraph 2.50 be subject to a minor change.
503	40	2.55	CP4		Paragraph 2.55 The term 'pepper potting' should be replaced with 'distributed'. Pepper potting can potentially be misinterpreted, thus should be omitted to avoid confusion.	Paragraph 2.55 subject to minor change
503	41	2.55	CP4		Paragraph 2.55 There should not necessarily be a rigid, pre-determined, maximum for the number of dwellings in the affordable housing groups to be provided. Depending upon the scale of development proposed, it may be possible to formulate a high quality design based on groups of 25-30 dwellings and still ensure an even distribution across the site.	Paragraph 2.55 subject to minor change
503	42		CP5		It fails to give sufficient policy guidance for the provision of retail facilities, as an appropriate level, commensurate with the scale of the proposed urban extensions, including Commonhead. The policy should include the retail provision proposed at urban extensions.	That Policy CP5 be revised.

<i>Respondent Ref</i>	<i>Comment No.</i>	<i>Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
503	43	Fig5	CP5		Figure 5 fails to take account of the new local centres including Commonhead and the district centre proposed at the EDA. The plan should be clear and more easily understood in terms of the future shopping hierarchy, reflecting urban extensions.	That Policy CP5 be revised.
503	44	2.74	CP5		Seek a minor change to paragraph 2.74, as the document fails to set out policy guidance for the inclusion of local centres at proposed urban extensions, including Commonhead. There is specific reference to a new district centre at the EDA, however there is no reference to additional local centres at Commonhead or Tadpole Farm.	Paragraph 2.74 be amended or as a new paragraph (2.7a) included
503	45	2.83	CP6		Paragraph 2.83 requires a cross reference to the new primary schools to be provided at the proposed urban extensions, including Commonhead. There should be no rigid requirement to provide a 2 form entry Primary School. Education provision should be determined by the scale of development it is intended to serve.	That paragraph 2.83 be subject to a minor change
503	46	2.86	CP6		Seek a minor change to paragraph 2.86 on the basis that the North star proposals have been superseded by events. Thus the paragraph should be amended to reflect the current situation regarding University provision in Swindon.	The Partnership seek a revision to Paragraph 2.86 to incorporate reference to safeguarding a new University Health Care Faculty at Commonhead. If the Faculty does not come forward the land would revert to residential. Paragraph 2.86 be subject to minor change.

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503	47	2.107	CP7		Seek a minor change before or after paragraph 2.107 which addresses Commonhead. The policy omits reference to the proposed Commonhead allocation.	The Partnership would welcome the opportunity to agree suitable wording for the new paragraph with the Council. That the Core Strategy be subject to Minor Change.
503	48	2.128	CP9		The policy omits reference to the proposed safeguarded land required for the future extension of the GWH at Commonhead. The plan need to contain much clearer explanation of how the extension to GWH is to be delivered through the planning process and cross referenced to the Commonhead allocation. This policy is inconsistent with para 2.128	Policy CP9 be subject to minor change.
503	49		CP9		Paragraph 2.128 omits reference to the proposed 5.5ha of safeguarded land required for the future extension of the GWH at Commonhead.	Paragraph 2.128 should be amended to include reference to the Commonhead urban extension and a more clearer explanation of the intended delivery mechanism set out.
503	50	2.156	CP10A	Y	The safeguarding of the canal route should be clearly shown on the Proposals Map and not relegated to the key diagram which does not have an OS base.	That Policy CP10A be subject to minor change and the Proposals Map be revised to only safeguard a route alignment which is realistically deliverable and achievable during the plan period. Paragraph 2.156 should be redrafted to reflect this.
503	51		CP10A		The Partnership question the deliverability of the safeguarded route to the South and East of Swindon (South of Coate Water, through the proposed Commonhead allocation and crossing the A419). The provision of the Canal should be subject to detailed technical studies and a viability test.	That Policy CP10A be subject to minor change and the Proposals Map be revised to only safeguard a route alignment which is realistically deliverable and achievable during the plan period.

<i>Respondent Ref</i>	<i>Comment No.</i>	<i>Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
503	52		CP10A		The Wilts and Berks Canal never passed through Commonhead at Swindon. Thus the Partnership question the robustness of the proposed route for the canal.	Paragraph 2.155 should be amended to make clear that the restoration of the canal relates to the existing historic alignment, where opportunities arise.
503	53		CP10A		Question the inclusion of Figure 8. Figure should be omitted as it is unclear and differs from the alignment shown on the Proposals Map. The diagram fails to show the proposed allocation at Commonhead or use a clear base.	Figure 8 be deleted or substantially revised
503	54	2.157	CP10A		The text in paragraph 2.157 is unclear as to whether it relates solely to the connection from Wichelstowe to Mouldon Hill or if it concerns the safeguarding of the canal to the south and east of the town.	Paragraph 2.157 be subject to minor change
503	55		CP10A		The intentions of paragraph 2.158 are unclear and inconsistent. This is because the final sentence states that where the route of the Canal is through urban extensions there will new safeguarding routes through a Master Plan.	The para should be amended to clarify which urban extensions are to include safeguarding routes. Such routes must be technically feasible and realistically deliverable if they are to be safeguarding by the Core Strategy.
503	56		Spatial Strategy		The Partnership do not accept that the Core Strategy sets out the most sustainable option to deliver the RSS requirements. The revised proposals for Commonhead can accommodate substantially more than 750 dwellings. Much more efficient and effective use should be made of the sustainable location at Commonhead, allocated in the LP for 1,800 dwellings.	Para 3.3 be revised to refer to a more sustainable alternative or by the omission of the final sentence.
503	57		Spatial Strategy		Omits the reference to Commonhead.	paragraph should be redrafted (3.4) to more clearly refer to the Commonhead allocation in light of the ambiguity included in RSS10.

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503		58	Spatial Strategy		Ambiguity in terms of how the proposed Commonhead allocation has been taken into account given that it is required for the 19,000 urban area figure.	The text should be amended to reflect this.
503		59	Spatial Strategy		The Partnership note that the EiP evidence refers to 1800 dwellings being provided at Commonhead. Thus the Partnership advocate an increased level of provision over and above the 750 dwellings currently in the CS.	Minor change to para 3.5
503		60	Spatial Strategy		The Partnership seek a minor change to Table 3 detailed in the Spatial Strategy. It would be much clearer if the completions information was presented relative to the draft RSS requirement and if it also detailed the net residual requirements to be planned for during the remainder of the plan period.	
503		61	Spatial Strategy		It is not accepted that the SHLAA identifies sufficient capacity during 0-5 years, 6-10 years and 11-15 years. Furthermore, the Partnership have raised concerns over how land at Commonhead was considered by the SHLAA process and the robustness of the SHLAA assumptions.	Final sentence should be deleted from para 3.8. The para and SHLAA should confirm the additional potential at Commonhead currently allocated for up to 1800 dwellings but with capacity well in excess of 750 dwellings.
503		62	Fig10	Y	Object to the inclusion of the Key Diagram at Figure 10. The information should be shown on the Proposals Map. The Commonhead allocation should be revised on the key Diagram to show an enlarged development area.	Key Diagram subject to minor change
503		63	SSP2		The policy does not constitute the most sustainable option for accommodating and delivering the scale of development envisaged by RSS10.	

<i>Respondent Ref</i>	<i>Comment No. Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
503	64	SSP2		Policy should include a degree of contingency to incorporate greater flexibility in the plan's overall housing land supply. It is unlikely that supply will be delivered in the precise manner suggested by SSP2.	Minor change to SSP2
503	65	SSP2		Most sustainable option would be to increase the scale of development at Commonhead.	Minor change to SSP2
503	66	SSP2		The Core Strategy should seek to make the best use of existing allocations in the first instance in accordance with PPS3	Minor change to SSP2
503	67	SSP2		Highly questionable that the entire 12,000 at the EDA or a further 6,700 dwellings will be delivered in the urban area by 2026 outside the TC. The continuing delays at Wichelstowe also compound delivery at Swindon. This is not reflected in SSP2.	Minor change to SSP2
503	68	SSP2		Further detailed evidence to the Council will be submitted which should be taken into account by the EiP Inspector. The Partnership have assembled significant evidence to demonstrate the suitability of Commonhead. Much of this has been accepted as common ground between the Council and the appellants.	
503	69	SSP2		The policy is inflexible as it fails to include any allowance for slippage and non implementation. The reference to the 3000 dwellings at Wiltshire should also be omitted and subject to a separate policy.	Minor change to SSP2

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503	70	3.14	SSP2		Paragraph 3.14 should omit reference to the 3000 dwellings at Wiltshire. The Core Strategy should only provide information for the Borough. The Council have no realistic means of influencing the delivery of 3000 dwellings outside its jurisdiction.	Para 3.14 subject to minor change
503	71		SSP2		The council should also acknowledge other practical factors which may undermine delivery in recent times (not just a result of the 'Credit Crunch').	Para 3.14 subject to minor change
503	72		SSP2		The Commonhead site can make a significant early contribution to the delivery of housing at Swindon as part of the overall trajectory as it has been investigated in detail and subject to an Environmental Assessment.	Para 3.14 subject to minor change
503	73		SSP2		Figure 11 is misleading as it includes assumptions about 3000 dwellings to be provided in Wiltshire, upon which the Council has no direct power to progress. The figure should also include the RSS requirement and residual requirement to clearly depict the scale of increased housing to be delivered at Swindon by 2026.	Figure 11 subject to minor change
503	74	3.17	SSP2		Paragraph 3.17 requires a minor change to reflect the fact that the NDA is nearing completion and does not merit a separate policy. The text should make clear that all the land envisaged at the NDA for development is covered by planning consents . If there are residual areas not covered then there remains a requirement to retain a policy for the NDA. The level of completions to April 2009 should be included in the Submission draft.	Para 3.17 be subject to a minor change and a new policy added in respect of the NDA.

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503	75	3.19	SSP2		Paragraph 3.19 is unclear and should be expanded to cross reference policy SSP8. It should refer to Area of Search 2A of the RSS and more explanation is required on the details and timing of the delivery of the EDA.	The para should be subject to minor change.
503	76	3.18	SSP2		The text in para 3.18 does not adequately explain the current position regarding Wichelstowe or its role in delivering the residual requirements at the SDA. The text does not cross refer Policy SSP6 which relates to Wichelstowe.	Paragraph 3.18 be subject to minor change.
503	77	3.19	SSP2		Include a paragraph after 3.19 to explain the expected role of the Commonhead allocation to meet the RSS requirements. The new paragraph should identify a revised urban extension at Commonhead and acknowledge that this site is an existing allocated site in the LP 'saved' by the Sops for up to 1,800 dwellings and has potential for more than 750 dwellings.	Insert a new paragraph 3.19A to be included in the Core Strategy to relate to the Commonhead allocation.
503	78		SSP3		Unclear as to what type of employment would be appropriate at Commonhead. It is also unclear how the figure of 15 hectares has been arrived at and the relationship with the existing LP allocation 'saved' by the Sops which includes 23 ha of employment land.	Policy should be subject to minor change.
503	79	3.24	SSP3		Fails to adequately explain how the RSS employment land requirements for about 128 ha of land in the Swindon Travel To Work Area is to be met and how the 55 ha is justified.	Paragraph 3.24 needs a minor change

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503	80		SSP4		The Partnership seek a change to this policy following the rejection by UWE to site a University at North Star. Furthermore, reference to a new tertiary campus for up to 7,000 students has also been superseded. This information is misleading.	That SSP4 be subject to a minor change.
503	81	3.33	SSP4		The Partnership seek a change to paragraph 3.33 following the rejection by UWE to site a University at North Star.	Paragraph 3.33 is subject to minor change
503	82	3.39	SSP4		The Partnership seek a change to paragraph 3.39 following the rejection by UWE to site a University at North Star and the need for an early review of the CAAP.	Paragraph 3.39 is subject to minor change
503	83		SSP5		The policy links between land at Commonhead urban extension allocation and the proposed extension to GWH should be more clearly acknowledged in SSP5G.	That Policy SSP5 be subject to minor change.
503	84		SSP5		The policy devalues and undermines the role and function of GWH. The Health Authority has established a clear need to extend the hospital.	
503	85		SSP5		Delivery of the hospital extension is dependent upon the revised Commonhead allocation. Thus, the policy should be amended to elaborate on this proposal and cross reference Policy SSP7.	The policy SSP5 be subject to minor change.
503	86	H	SSP5		Object to criterion H, regarding Fire Station provision. Reference to Fig10 should be deleted, including the 'area of search' on the Proposals Map and at Figure 13. There are also inconsistencies of the policy relative to the EDA in respect of Fire Station provision.	That Policy SSP5 and Figure 13 be subject to minor change.

<i>Respondent Ref</i>	<i>Comment No.</i>	<i>Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
503	87		SSP5		The Partnership seek the inclusion of a supporting paragraph in respect of the provision of Fire Stations at Swindon. The lack of clarity in terms of the preferred location of the Fire Station needs to be addressed.	Amend the Core Strategy to include an additional paragraph to elaborate on the provision of new Fire Stations at Swindon.
503	88	Fig13	SSP5		There is no evidence to support the inclusion of a new Fire Station at Commonhead, it has not been identified as a requirement nor subject to any negotiations.	Figure 13 subject to minor change.
503	89	Fig13	SSP5		Figure 13 should identify the proposed extension to GWH as sought in policy SSP7.	Fig13 be subject to minor change
503	90	Fig14	SSP5		The Partnership accept that Commonhead should make provision for education. However, consider that the annotation on Fig14 is unclear and confusing. Fig14 needs to be revised to address the confusion.	Fig 14 be subject to minor change.
503	91	3.52	SSP5		The Partnership consider that the text in paragraph 3.52 is inconsistent with Fig13 and policy SSP5H. The paragraph is unclear and needs to be expanded to explain how, where and when the new Fire Station will be delivered.	Paragraph 3.52 be subject to a minor change.
503	92		SSP6		The policy as drafted does not reflect the latest position at Wichelstowe. Elements constructed or consented could be excluded from the policy and the residual remainder as of 2009 should be included (not the original 4,500). References to the LP have been superseded and thus there is no requirement to refer to them in the Core Strategy.	Policy SSP6 be subject to minor change.

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503	93	3.55	SSP6		The text is wholly inadequate to explain the policy intentions for Wichelstowe as set out in policy SSP6. The implications of the delayed implementation of Wichelstowe in terms of sustainable construction and affordable housing provision need to be more clearly explained.	Paragraph 3.55 be subject to a minor change.
503	94	Fig15	SSP7	Y	Object to Fig15 as it is inconsistent with the depiction of the Commonhead allocation shown on the Proposals Map. The allocation should be enlarged to include more of the existing LP allocation Policy DS3.	Fig15 should be deleted or subject to minor change.
503	95		SSP7		Land at Commonhead is currently allocated in the Local Plan, under Policy DS3. This policy has been saved by the Sops. Thus it is not correct to state that the policy has expired.	The wording should be deleted and replaced by a more appropriate wording, fairly and accurately setting out the situation and the justification for the revised allocation at Commonhead. The Commonhead allocation in the Core Strategy should be enlarged. Paragraph 3.57 be subject to minor change.
503	96	3.58	SSP7		The specific reference to a new University in Central Swindon should be amended, in light of UWE's rejection of the North Star site. UWE seek to establish a Health Care Faculty at Commonhead thus the text should be amended to safeguard new University requirements at commonhead	Paragraph 3.58 be subject to minor change.
503	97	3.59	SSP7		The text as drafted in paragraph 3.59 is inaccurate and misleading. The allocation for Commonhead should be reassessed in light of growth requirements set out in the RSS.	Paragraph 3.59 be subject to minor change.

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503	98	3.59	SSP7		The Partnership do not accept the findings of the SSUE study, particularly that development should be concentrated North of Day House Lane. It is clear from the Inspector's Report that development South of Day House Lane would be appropriate in some parts of the site.	Paragraph 3.59 be subject to minor change.
503	99	3.59	SSP7		It is unclear how the buffer (between new development and Coate Water Country Park) is to be achieved and defined. Its character, role and function need to be agreed between the Council and the Partnership.	Paragraph 3.59 be subject to minor change.
503	100	3.59	SSP7		The reference to the Babbie report is acknowledged, however any factual and fair comparative analysis between the extreme edges of the EDA or Tadpole Farm relative to land at Commonhead would conclude that Coate South has greater potential to accommodate further development in a more sustainable manner.	Paragraph 3.59 be subject to minor change.
503	101	3.61	SSP7		With regards to addressing open space requirements at Commonhead it is important to look at turning on site constraints into opportunities.	Paragraph 3.59 be subject to minor change.
503	102	3.60	SSP7		The Partnership consider that the current wording is unclear in terms of the location of the GWH extension at Commonhead. It is not clear how such a site is to be delivered in conjunction with the Commonhead allocation. The Partnership seek to re-open negotiations with the Council and the NHS Trust in this regard.	That paragraph 3.60 be subject to minor change. A cross reference to Policy SS7 would improve the text
503	103		SSP7	Y	The location of the GWH extension is not shown on the Proposals Map nor Figure 15	

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503	104		SSP8		The policy approach to the EDA is inconsistent with the proposed Commonhead allocation. It is considered that the delivery of the EDA cannot be relied upon by 2026. Thus a degree of flexibility in the overall housing land supply to off set any potential delays that might arise from the EDA or elsewhere at Swindon.	That Policy SSP8 be subject to minor change.
503	105		SSP8		Object to SSP8 point xi) on the basis that there is no requirement to safeguard land for a section of canal through the EDA.	
503	109	3.65	SSP8		The policy approach to the EDA is inconsistent with the proposed Commonhead allocation. The density at Commonhead should be determined by a design led approach and not a pre determined average net density minimum.	
503	110	3.68	SSP8		The Partnership note the comments regarding economic viability at the EDA. This issue also relates to other urban extensions at Commonhead, Tadpole Farm and the Wichelstowe.	
503	111	3.69	SSP8		The justification for the SPD is questionable. It is important that the SPD does not cover matters that should be in the Core Strategy.	That paragraph 3.69 be subject to minor change.
503	112	3.71	SSP8		The Partnership note that a separate S106 tariff will be developed for the EDA. However the basic principles of this should be set out in the plan. Plan users are being denied the opportunity to test the tariff at the EiP.	Paragraph 3.71 should be subject to minor change.

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503	113		SSP9		Questionable whether the increased number of units at Tadpole Farm are the most sustainable option to accommodate the additional 500 units. Land at Commonhead is comparatively more sustainable option and is better related to the TC an Old Town.	Policy SS9 should be subject to minor change.
503	114	Fig17	SSP9	Y	Object to Figure 17. It is inconsistent with the Proposals Map. It is the role of the Proposals Map to show the details of Figure 17 and not the figure itself.	Delete Figure 17.
503	115	3.72	SSP9		The Core Strategy should set out proper justification for the enlarged Tadpole Farm site. Particularly in relation to the draft RSS Area of Search 2B which does not specifically refer to the North West of Swindon (Policy HMA2).	Paragraph 3.72 should be subject to minor change.
503	116	3.73	SSP9		Questionable whether the increased number of units at Tadpole Farm are the most sustainable option to accommodate the additional 500 units. It is not accepted by the Partnership that this is the most appropriate and sustainable option to accommodate 500 additional dwellings. It is not based upon a robust and credible evidence base.	remove paragraph 3.73.
503	117		SSP10		Object to Policy SSP10. It is questioned whether the Borough Council should dictate policy at the LDF level on schemes in a neighbouring authority. It should be a matter for Wiltshire Council through the Wiltshire Core Strategy.	delete policy SSP10
503	118	3.75	SSP10		The paragraph should be revised to more clearly state the aspirations for infrastructure provision in Policy SSP10. It is more appropriate that the requirements of the Borough are included in the plan as supporting text only.	Minor change to paragraph 3.75

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503	119	3.76	SSP10		Rephrase the wording of the paragraph to reflect its status and ability to secure such links.	Paragraph 3.76 be subject to minor change.
503	120	3.77	SSP10		Paragraph needs to be rephrased to more appropriately reflect its status and ability to secure links for wildlife movement in areas outside the Borough.	Minor change to paragraph 3.77
503	121	3.79	SSP11		The paragraph is redundant and has been superseded by events (Commonhead Appeal, August 2009).	Paragraph 3.79 should either be deleted or substantially revised to set out the latest position and acknowledge the potential land at Commonhead.
503	122	3.81	SSP11		Not accepted that the additional 500 dwellings should be transferred to Tadpole Farm. The scope to direct units to other sites should be considered further.	Paragraph 3.81 should be deleted or revised.
503	123	3.83	SSP11		Object to the policy as it seeks to impose an 'urban exceptions' policy on Wiltshire Council. The text is unjustified and contrary to national policy.	Paragraph 3.83 should be deleted or revised.
503	124		DMP1		Object to DMP1, particularly with regard to sustainable construction, low/zero carbon energy and the Swindon Carbon Offset fund. The policy should not duplicate national or regional policy.	Revise DMP1 by deleting Parts 10, 11 and 12
503	125	4.1	DMP1		Omit the penultimate bullet point regarding CO2 emission reductions.	Minor change to paragraph 4.1
503	126	4.2	DMP1		The paragraph repeats national planning guidance. Principles 10 -12 would be superfluous if Policy DMP1 is amended.	Policy 4.2 should be subject to minor change.
503	127	4.3	DMP1		The final point in the paragraph should be omitted as the matter is sufficiently covered by national and regional policy.	Minor change to Paragraph 4.3

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503	128		DMP2		The policy should be changed as it seeks to relegate infrastructure issues to an SPD. Key infrastructure requirements should be set out in the Core Strategy to enable public scrutiny at the EiP.	Minor change to the policy.
					Unclear whether the unnumbered text box is intended to be part of the policy or not	
503	129		DMP4A		The policy is contrary to the emerging RSS Policy H1 and national policy on affordable housing. The policy falls short of a robust policy on affordable housing. It does not identify between social rented and intermediate tenures, nor explain any different requirements or tenure mix at urban extensions.	Minor change to Policy DMP4A.
503	130		DMP4A		The policy should include a viability test (in accord with PPS3, para 29). The policy should allow for a case by case viability through 'open book' arrangements. The policy should also take account of Blythe Valley case.	Minor change to Policy DMP4A.
503	131		DMP3		Paragraph C is unclear as to whether it is intended to apply to the EDA, Tadpole Farm and Commonhead.	Minor change to DMP3.
503	132		DMP7		The policy is inconsistent with Policy SSP7 and it makes no reference to the GWH extension.	
503	133	4.68	DMP7		Omits the extension to the GWH or cross refer to the allocation at Commonhead. It will only realistically be secured in conjunction with the Commonhead allocation.	Minor change to paragraph 4.68
503	134		App 1		The saved policies which relate to Commonhead should continue to remain as part of the development plan unless superseded by a more appropriate and sound set of policies for Commonhead.	Minor change to Appendix 1

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503	135		App 5		The housing trajectory should be changed as the Partnership do not accept the assumptions regarding Tadpole Farm, the small scale urban extensions in Wiltshire, the EDA or Commonhead	Revise the Housing Trajectory
503	136		App 6		It remains the responsibility of Wiltshire Council to determine the Preferred Options. Inclusion of the plan is misleading and suggests that the site selection process of the Wilts Core Strategy may be predetermined by the Borough Council.	delete Appendix 6.
503	137		Key Diagram	Y	The Proposals Map should be revised to take account of various objections to the Core Strategy. Particularly the depiction of Commonhead and associated policies. Information on the key Diagram should be added to the Proposals Map. The Key Diagram should then be omitted from the Core Strategy to prevent confusion.	Amend the Proposals Map
503	138	2.2	CP1		Support paragraph 2.2	None
503	139	2.28	CP3		Endorse the benefits associated with the presence of a University at Swindon.	None
503	140		CP6		Support the allocation of a new primary school at Commonhead.	None
503	141		CP7		Support the delivery of a comprehensive sustainable strategic and local transport network.	None
503	142		CP8		Support the policy.	None
503	143		CP10		Support the policy.	None
503	144	3.15	SSP2		Support the paragraph wording.	None

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503	145	3.74	SSP10		Support this paragraph wording.	None
531	1		SSP7		SBC is and was poor at consultation and as the Government's White Paper "Communities in Control: Real Power, Real People" advocates community involvement in the decision making process, SSP7 is not legally compliant due to so much opposition.	
531	2		SSP7		The references to Commonhead are deliberately misleading as Commonhead is the old road junction and this is not marked on the Proposals Map.	
531	3		SSP7		The Local Planning Authority do not respect the landscape at Coate and many misappropriation or words and contradictions have been used regarding landscape (many statements/quotes are highlighted from documents, see written rep). Core Strategy is unsound unless the attitude to Coate landscape is resolved, suggests the landscape should be kept.	Delete all of SSP7, except: Safeguard around 5.5 hectares of land for future expansion of the GWH, future building heights subject to planning permission.
532	1		Spatial Vision		Support the vision to regenerate Swindon Town Centre and provide a quality business destination supported by a sustainable integrated transport network.	
532	2		CP1		Support the principles of sustainable development, through such measures as providing high density developments that are highly accessible by multi-modal methods of transport.	

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532		3	CP2		Recognise the need for contributions to mitigate any increase in the requirement for infrastructure and services, however it should be recognised that development in central locations will require less contributions due to higher standards of existing infrastructure. Do not support a blanket approach to the provision of contributions and consider that they should be commensurate to the impact that a development is likely to have on infrastructure within the immediate locality.	
532		4	CP3		Support the objective to meet the economic growth and to retain the focus for office development within the Central Area and investment in public realm and high quality development.	
532		5	CP4		Supports the objectives to maximise the redevelopment of brownfield land in urban areas. However an element of greenfield land will be required whilst brownfield land opportunities will need to be maximised.	
532		6	CP4		Support the provision of higher density developments in locations that are easily accessible by pedestrians and cyclists.	
532		7	CP4		Consider the 30% affordable provision should be sought unless it can be demonstrated that viability and funding circumstances prevent this.	
532		8	CP5		Support the objective to accommodate major retail development in the town centre however small scale retail uses that play an ancillary role and increase sustainability should be included.	Include text to state that small scale retail uses that play an ancillary role should be allowed.

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532		9	CP7		Support the provision of a rapid transport network connecting the centre with surrounding areas, along with improvements to other forms of public transport.	
532		10	CP7		Object to the levy for contributions towards these services for developments in central locations as these are already serviced by public transport safe and convenient pedestrian and cycle access.	
532		11	SSP4		Supports office and residential development within the central area. Approves of the provision for a 1,000 space car park in the central area.	
532		12	SSP4		Supports the outline for the redevelopment of the central area and reiterates its commitment to delivering a high quality and sustainable development at Union Square.	
532		13	DMP1		Supports the objective of securing high quality design within new developments.	
532		14	DMP2		Supports an approach to planning contributions that is commensurate to the type and location of the development proposed however would welcome reference to contributions that are subject to viability.	
532		15	DMP2		Object to a system that adopts a blanket approach to contributions as this is not in conformity to Circular 05/2002 Annex B.	
532		16	DMP4A		Would like to see reference to identify that affordable provision will be sought unless it can be demonstrated that viability and funding circumstances may prevent this.	

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544	1		CP7		<p>Traffic and Transport</p> <p>An integrated transport policy cannot work in isolation from the area that it will serve. There is no evidence of a sustainable transport plan or the capital expenditure to pay for changes that would be needed to support the increased population.</p>	A full sustainable transport plan for the whole area is required taking into consideration the wider impacts that this growth will have on the surrounding towns and villages.
544	2		CP4		<p>Housing</p> <p>The proposed increase in numbers will not only risk the coalescence of these communities, it may mean that they are unable to cope with the increased pressure that will build up for further growth in those areas too. A clear and defined strategy is required.</p>	A strategy for managing growth in the SURROUNDING areas is required.
544	3		CP2A		<p>Flooding</p> <p>The increase will inevitably impact upon drainage and consequential flooding in the area. The capacity of the two rivers (The Ray and the Key) to manage is not apparent.</p>	A full flood risk assessment is required in the Upper Thames Area.
580	1		SSP9		<p>Tadpole Farm area is already prone to flooding from River Ray. Development of Tadpole Farm would exacerbate run-off and therefore increase flooding.</p>	none
580	2		SSP9		<p>Congestion is already a severe problem north of Thamesdown Way - access difficulties from parked cars obstructing the road and bus route. The proposed links to Thamesdown Drive will increase levels of noise and pollution that current residents of Redhouse Way are exposed to.</p>	To re-align Tadpole Lane from the River Ray Bridge eastwards to its junction with the A419 former Turnpike roundabout.

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581	1	0	General		HSE have no comments to add and our previous response to the Preferred Options Paper will be relevant to this consultation.	
582	1		SSP7		SBC ignored Government White Paper "Communities in Control: Real Power, Real People" (9 July 2008). 52000 objections lodged against Coate Water development were ignored in previous consultation stages in preparation of this document.	Delete Policy SSP7 apart from sub paragraph (ix)
582	2		SSP7		Remoteness of Commonhead from Swindon urban area renders the policy ineffective. SBC agreed to protect the area from inappropriate land use development once Great Western Hospital building was agreed.	Delete Policy SSP7 apart from sub-para (ix). The only development that should be considered is the likely expansion of the Hospital, which serves needs of an area considerably greater than Swindon town.
583	1		SSP9 (ix)		The residential areas in Redhouse and Oakhurst are heavily congested with difficulties passing cars parked outside houses, particularly during peak school hours. This problem will worsen when Isambard School expands to full capacity in the future.	Make Tadpole Lane an appropriate A Road linking into the Blunsdon Turnpike to the North and Thamesdown Drive to the South, thereby avoiding the residential areas.
583	2		SSP9 (ix)		The expansion of Isambard School will affect the ability of children to walk/cycle to school safely. This is because the increased volume of traffic associated with the school's expansion will render the residential streets less safe for walking/cycling and influence further parents to drive their children to school instead. This will simply compound traffic/parking problems.	Make Tadpole Lane an appropriate A Road linking into the Blunsdon Turnpike to the North and Thamesdown Drive to the South, thereby avoiding the residential areas.
584	1		General		We have no specific comments to make on this document at this stage.	

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585	1		SSP9 (Point ix)		Congestion: The proposed road link from the Tadpole Farm development through Redhouse and Oakhurst is unsound. The local residential roads are not designed for heavy through-traffic. The roads are extremely narrow, exacerbated by the high volume of on-street parking. More traffic would be a disaster for the area.	
586	1		SSP9 (Point ix)		Congestion: The proposed road link from the Tadpole Farm development through Redhouse and Oakhurst via Addinsell Road. The local residential roads are not designed for heavy through-traffic particularly with large numbers of parked cars on them and families/children playing.	An alternative access route that does not take traffic from the proposed development through a residential area.
587	1		SSP9 (Point ix)		Congestion: The proposed road link from the Tadpole Farm development through Redhouse and Oakhurst is unsound. On-street car parking currently creates single-track roads and congests roundabouts. The local residential roads in Addinsell Road and Eastbury Way are not designed for heavy through-traffic.	Do not accept this proposal.
587	2		SSP9 (Point xi)		Safety: The proposed road link from the Tadpole Farm development through Redhouse and Oakhurst. The link road would create a busy roundabout very close to the new children's play area and the public open space at the top of Addinsell Road. This will be extremely hazardous to children, dogs and pedestrians walking in that area. Visibility to drivers in these narrow streets is poor - any increase in traffic could be catastrophic.	Do not accept the proposal and keep Redhouse as safe as possible.

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588		1	SSP9 (Point ix)		Congestion: The proposed road link from the Tadpole Farm development through Redhouse and Oakhurst is unsound. The local residential roads are not designed for heavy through-traffic and are already heavily congested with parked cars. There will no doubt be a major issue of pedestrian safety.	
589		1	SSP9 (Point ix)		Congestion: The proposed access road link from the Tadpole Farm development through Redhouse and Oakhurst via Addinsell Road is unsound. The local residential roads are not designed for heavy through-traffic and are already heavily congested with parked cars Locals often have to wait for oncoming vehicles to pass, creating a stop-start drive around the estate.	
589		2	SSP9 (Point ix)		Safety: The proposed road link from the Tadpole Farm development through Redhouse and Oakhurst contradicts "Safer routes to school" in paragraph 2.101 of Policy CP7 Sustainable Transport & Movement. Popular children's parks, schools and nurseries at risk to increased traffic.	
589		3	SSP9		Anti-Social Behaviour: The urban design of Redhouse fails to mitigate against anti-social behaviour and fails to consider recent research on best practice in this area.	
590		1	SSP7		The Council has ignored the Government White Paper "Communities in Control" (2008) - the petition of local residents has been ignored.	SSP7 should be withdrawn as there is no recognition of the environmental impact of the development and no regard given to the cultural heritage of Swindon. There are alternative sites within the area of Greater Swindon which could be developed.

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590		2	SSP7		This plan will seriously damage the literary and cultural landscape of the North Downs and the area around Coate, and also to Coate Water as an SSSI. I am astounded by the Council's lack of regard for the heritage of Richard Jefferies, a great and magnificent writer from the area.	SSP7 should be withdrawn as there is no recognition of the environmental impact of the development and no regard given to the cultural heritage of Swindon. There are alternative sites within the area of Greater Swindon which could be developed.
591		1	SSP7		Council ignored advice in Government White Paper (Real Power, Real People - 2008). 52,000 objections of Swindon people have been ignored.	Delete policy SSP7 - no confidence in "respected views" from Coate Water and North Wessex Downs AONB protecting archaeological features.
591		2	SSP7		The Council is breaking its word on inappropriate development once Great Western Hospital is built. National Policy (PPS1) supports literary landscape, archaeological features and areas of outstanding natural beauty. Day House Copse Nature Reserve cannot be secured. There is no recognition of the need to assess environmental impact on the literary merits and value of Richard Jefferies hand.	SSP7 should be withdrawn. There are many Brownfield sites with derelict buildings that could be re-used.
591		3	SSP7		No confidence in "respected views" from Coate Water and North Wessex Downs AONB protecting archaeological features. No confidence that a "robust buffer" between Coate Water and new development will be created.	SSP7 should be withdrawn. There are many Brownfield sites with derelict buildings that could be re-used.
591			SSP7		Remote from main urban area - no integration with the town. More land needed for Hospital expansions to meet the needs of an expanding town.	SSP7 should be withdrawn. There are many Brownfield sites with derelict buildings that could be re-used.

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592		1	App 9: Glossary of Terms		Community Safety needs to be made more explicit to emphasize that community safety issues are incorporated into Swindon's planning process. This will ensure the public that the Community Safety Partnership are compliant with the 1998 and 2006 Acts.	Add the following Statement: Community Safety "Local Authorities are required to consider community safety in all its work in order to prevent, reduce and contain the social, environmental and intimidatory factors that affect people's right to live without the fear of crime and which improve their quality of life."
593		1	CP4		Swindon is being completely spoilt by the endless construction of new houses. The small villages are being swallowed up and the council went back on a promise by building on a floodplain.	Expand the hospital to cope with the influx of new residents.
594		1	CP4		Whilst appreciate the efforts made by the Council to deliver development on previously developed land every effort should be made to increase the share of development on implemented on previous developed land in line with regional target of 50% in the South West Regional Spatial Strategy (RSS).	
594		1	General		We have noted the contents of the document and will respond if considered appropriate.	
594		2	CP4		Whilst the affordable housing requirement is welcomed, the half-sentence on viability and funding circumstances could potentially be used as a loophole for developers. It would be helpful if the Council was able to provide evidence suggesting in which circumstances viability issues may arise, and how to overcome those issues. Supporting para. 2.51 only refers to current market conditions which could impact on the delivery of affordable housing.	Strengthen policy CP4 (d) by including wording like 'unless it can clearly demonstrated that viability and funding circumstances prevent meeting a 35% target for affordable housing provision.'

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594		3	SSP10		Whilst accept that the policy cannot be s detailed as, for example, SSP8, suggest that the Core Strategy should provide clarity in which way the more detailed guidance will be established. We suggest that an early review of the Core Strategy would be appropriate, in order to provide a clear framework for delivery.	
594		4	SSP8		On the EDA some key infrastructure schemes will be more important than others to un lock areas for development. It will therefore be important to clearly prioritise infrastructure schemes so provide a better understanding to all stakeholders. The implementation and Monitoring Plan could be clearer in this respect.	
595		1	General		The CAA would not wish to comment on local development plans and recommends that Swindon Borough Council consult aerodrome operator licencees directly.	
596		1	General		We would not like to make comment as none of our assets are close to the areas highlighted on this document.	
597		1	CP5		Small traders are not supported sufficiently by the council, particularly through excessively high rent charges in a time of recession.	Reduce rent charges to make town centre sites more affordable for smaller retailers.
597		2	CP7		Access to town centre The current main access route into the town centre from the M4 Junction 16 exits via the county ground past desolate land. In addition, there are far too many pedestrian crossings which hinder traffic flow.	Access to town centre re-routed via Junction 15 (Coate Water and Queens Drive). Replace pedestrian controlled lights with bridges. Costs will initially be higher but require no maintenance.

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599		1	SSP7		Council has ignored the majority view of 52,000 objectors to Coate development, contrary to the advice in the Government's White Paper "Communities in Control: Real Power, Real People - 2008"	Policy SSP7 should be deleted. No confidence in "respected views" from Coate Water and North Wessex Downs AONB (Point x) or protecting archaeological features if surrounded by a modern estate (Point viii). No confidence that a "robust buffer" between Coate Water and new development will be created (Point ix) because there has been no recognition of the need to assess environmental impact of the development based on the literary value of Richard Jefferies' land.
599		2	SSP7		It is not consistent with national policy - Delivering Sustainable Development (PPS1) - by virtue of the fact that the potential damage to the ecology, to an important literary landscape, to significant archaeological features, to strategic views from the North Wessex Downs AONB & Coate Water Country Park, to Coate Water SSSI and Day House Copse Local Nature Reserve cannot be secured.	Policy SSP7 should be deleted. No confidence in "respected views" from Coate Water and North Wessex Downs AONB (Point x) or protecting archaeological features if surrounded by a modern estate (Point viii). No confidence that a "robust buffer" between Coate Water and new development will be created (Point ix) because there has been no recognition of the need to assess environmental impact of the development based on the literary value of Richard Jefferies' land.
599		3	SSP7		It's not an effective policy. The area is remote from the main urban area of Swindon and cannot be integrated with the town.	Policy SSP7 should be deleted.
599		4	SSP7		The policy is not justified - plenty of Brownfield alternatives exist to develop housing and employment land to meet government targets for Swindon. The land at Coate is more important to Swindon's future as an area of rural recreation and of high landscape value.	Policy SSP7 should be deleted

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599	5		SSP7		No mention is made of preventing the pollution from the landfill area proposed for development.	Landfill pollution management?
599	6		SSP7		The proposal is inconsistent with the Council's previous commitment to protect this area from inappropriate development once the Great Western Hospital was built.	Delete policy SSP7
600	1		SSP7		Council has ignored the majority view of 52,000 objectors to Coate development, contrary to the advice in the Government's White Paper "Communities in Control: Real Power, Real People - 2008" . They have ignored nationwide representations from people to whom it is important for its literary, archaeological and landscape values.	The Core Strategy would be made legally compliant and sound by the removal of SSP7.
600	2		SSP7		The Council made a commitment to protect the area from further development once the Great Western Hospital was built. To go back on this raises serious questions about the Council's trustworthiness and commitment to good practice.	The Core Strategy would be made legally compliant and sound by the removal of SSP7.
600	3		SSP7		It is not consistent with national policy - Delivering Sustainable Development (PPS1) - it is unsound to site an estate of this kind in a landscape of such amenity value and historic sensitivity. It is questionable whether all viable alternatives have been explored.	The Core Strategy would be made legally compliant and sound by the removal of SSP7.
600	4		SSP7		The development could become subject to forms of social and economic decline typical of unintegrated conurbations: it would appear to be characterless: neither a village nor a suburb	The Core Strategy would be made legally compliant and sound by the removal of SSP7.

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600		5	SSP7		The future land requirements of the hospital cannot be anticipated and the policy would curtail future expansion.	The Core Strategy would be made legally compliant and sound by the removal of SSP7.
600		6	SSP7		The structural and human impact of development - potential damage to the ecology, to an important literary landscape, archaeology (identified bronze age stone circle) and visual landscape of Coate and the North Wessex Downs. Close proximity of an AONB, Country Park, Local Nature Reserve and SSSI.	The Core Strategy would be made legally compliant and sound by the removal of SSP7.
601		1	SSP7 (Point ix)		I would not want this to go ahead without a secure protection of the buffer zone.	It needs to be designated "High Landscape"
602		1	SSP7		The Government's White Paper "Communities in Control: Real Power, Real People" calls for local authorities to involve communities in the decision-making process. Policy SSP7 clearly conflicts with Government when 52,000 people have signed a petition in order to ensure that a 1km buffer of countryside is protected against development east and south of Coate Water Country Park. The council have ignored this.	Delete wording of SSP7 and replace with: i) Up to 10 hectares of land at Commonhead will be safe-guarded for future expansion of the Great Western Hospital. ii) Land between the hospital, Coate Water Country Park and the motorway is designated for its high landscape value, its special historic and literary quality and its potential ecological value. No development will be permitted iii) Land to the west of Day House Lane will be managed as a wildlife conservation area to add value to Coate Water SSSI, Coate Water Local Nature Reserve, Day Copse Local Nature Reserve and Burderop Woods North Local Nature Reserve.

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602		2	SSP7		The policy is not justified - plenty of Brownfield alternatives exist to develop housing and employment land to meet government targets for Swindon. The land at Coate is more important to Swindon's future as an area of rural recreation and of high landscape value.	Delete wording of SSP7 and replace with: i) Up to 10 hectares of land at Commonhead will be safe-guarded for future expansion of the Great Western Hospital. ii) Land between the hospital, Coate Water Country Park and the motorway is designated for its high landscape value, its special historic and literary quality and its potential ecological value. No development will be permitted iii) Land to the west of Day House Lane will be managed as a wildlife conservation area to add value to Coate Water SSSI, Coate Water Local Nature Reserve, Day Copse Local Nature Reserve and Burderop Woods North Local Nature Reserve.
602		3	SSP7		The proposal is inconsistent with the Council's previous commitment to protect this area from inappropriate development once the Great Western Hospital was built.	Delete wording of SSP7 and replace with: i) Up to 10 hectares of land at Commonhead will be safe-guarded for future expansion of the Great Western Hospital. ii) Land between the hospital, Coate Water Country Park and the motorway is designated for its high landscape value, its special historic and literary quality and its potential ecological value. No development will be permitted iii) Land to the west of Day House Lane will be managed as a wildlife conservation area to add value to Coate Water SSSI, Coate Water Local Nature Reserve, Day Copse Local Nature Reserve and Burderop Woods North Local Nature Reserve.

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602		4	SSP7		It's not an effective policy. The area is remote from the main urban area of Swindon and cannot be integrated with the town. More land needs to be set aside for the hospital expansion to meet the health needs of a growing town.	<p>Delete wording of SSP7 and replace with:</p> <p>i) Up to 10 hectares of land at Commonhead will be safe-guarded for future expansion of the Great Western Hospital.</p> <p>ii) Land between the hospital, Coate Water Country Park and the motorway is designated for its high landscape value, its special historic and literary quality and its potential ecological value. No development will be permitted</p> <p>iii) Land to the west of Day House Lane will be managed as a wildlife conservation area to add value to Coate Water SSSI, Coate Water Local Nature Reserve, Day Copse Local Nature Reserve and Burderop Woods North Local Nature Reserve.</p>
602		5	SSP7		It is not consistent with national policy – Delivering Sustainable Development (PPS1) – by virtue of the fact that the potential damage to the ecology, to an important literary landscape, to significant archaeological features, to strategic views from the North Wessex Downs AONB & Coate Water Country Park, to Coate Water SSSI and Day House Copse Local Nature Reserve cannot be secured.	<p>Delete wording of SSP7 and replace with:</p> <p>i) Up to 10 hectares of land at Commonhead will be safe-guarded for future expansion of the Great Western Hospital.</p> <p>ii) Land between the hospital, Coate Water Country Park and the motorway is designated for its high landscape value, its special historic and literary quality and its potential ecological value. No development will be permitted</p> <p>iii) Land to the west of Day House Lane will be managed as a wildlife conservation area to add value to Coate Water SSSI, Coate Water Local Nature Reserve, Day Copse Local Nature Reserve and Burderop Woods North Local Nature Reserve.</p>

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603		1	SSP7		The Government's White Paper "Communities in Control: Real Power, Real People" calls for local authorities to involve communities in the decision-making process. Policy SSP7 clearly conflicts with Government when 52,000 people have signed a petition in order to ensure that a 1km buffer of countryside is protected against development east and south of Coate Water Country Park. The council have ignored this.	Delete wording of SSP7 and replace with: i) Up to 10 hectares of land at Commonhead will be safe-guarded for future expansion of the Great Western Hospital. ii) Land between the hospital, Coate Water Country Park and the motorway is designated for its high landscape value, its special historic and literary quality and its potential ecological value. No development will be permitted iii) Land to the west of Day House Lane will be managed as a wildlife conservation area to add value to Coate Water SSSI, Coate Water Local Nature Reserve, Day Copse Local Nature Reserve and Burderop Woods North Local Nature Reserve.
603		2	SSP7		The policy is not justified - plenty of Brownfield alternatives exist to develop housing and employment land to meet government targets for Swindon. The land at Coate is more important to Swindon's future as an area of rural recreation and of high landscape value.	Delete wording of SSP7 and replace with: i) Up to 10 hectares of land at Commonhead will be safe-guarded for future expansion of the Great Western Hospital. ii) Land between the hospital, Coate Water Country Park and the motorway is designated for its high landscape value, its special historic and literary quality and its potential ecological value. No development will be permitted iii) Land to the west of Day House Lane will be managed as a wildlife conservation area to add value to Coate Water SSSI, Coate Water Local Nature Reserve, Day Copse Local Nature Reserve and Burderop Woods North Local Nature Reserve.

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603	3	SSP7		The proposal is inconsistent with the Council's previous commitment to protect this area from inappropriate development once the Great Western Hospital was built.	<p>Delete wording of SSP7 and replace with:</p> <p>i) Up to 10 hectares of land at Commonhead will be safe-guarded for future expansion of the Great Western Hospital.</p> <p>ii) Land between the hospital, Coate Water Country Park and the motorway is designated for its high landscape value, its special historic and literary quality and its potential ecological value. No development will be permitted</p> <p>iii) Land to the west of Day House Lane will be managed as a wildlife conservation area to add value to Coate Water SSSI, Coate Water Local Nature Reserve, Day Copse Local Nature Reserve and Burderop Woods North Local Nature Reserve.</p>
603	4	SSP7		It's not an effective policy. The area is remote from the main urban area of Swindon and cannot be integrated with the town. More land needs to be set aside for the hospital expansion to meet the health needs of a growing town.	<p>Delete wording of SSP7 and replace with:</p> <p>i) Up to 10 hectares of land at Commonhead will be safe-guarded for future expansion of the Great Western Hospital.</p> <p>ii) Land between the hospital, Coate Water Country Park and the motorway is designated for its high landscape value, its special historic and literary quality and its potential ecological value. No development will be permitted</p> <p>iii) Land to the west of Day House Lane will be managed as a wildlife conservation area to add value to Coate Water SSSI, Coate Water Local Nature Reserve, Day Copse Local Nature Reserve and Burderop Woods North Local Nature Reserve.</p>

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603		5	SSP7		It is not consistent with national policy – Delivering Sustainable Development (PPS1) – by virtue of the fact that the potential damage to the ecology, to an important literary landscape, to significant archaeological features, to strategic views from the North Wessex Downs AONB & Coate Water Country Park, to Coate Water SSSI and Day House Copse Local Nature Reserve cannot be secured.	Delete wording of SSP7 and replace with: i) Up to 10 hectares of land at Commonhead will be safe-guarded for future expansion of the Great Western Hospital. ii) Land between the hospital, Coate Water Country Park and the motorway is designated for its high landscape value, its special historic and literary quality and its potential ecological value. No development will be permitted iii) Land to the west of Day House Lane will be managed as a wildlife conservation area to add value to Coate Water SSSI, Coate Water Local Nature Reserve, Day Copse Local Nature Reserve and Burderop Woods North Local Nature Reserve.
604		1	SSP7		The Government's White Paper "Communities in Control: Real Power, Real People" calls for local authorities to involve communities in the decision-making process. Policy SSP7 clearly conflicts with Government when 52,000 people have signed a petition in order to ensure that a 1km buffer of countryside is protected against development east and south of Coate Water Country Park. The council have ignored this.	Delete wording of SSP7 and replace with: i) Up to 10 hectares of land at Commonhead will be safe-guarded for future expansion of the Great Western Hospital. ii) Land between the hospital, Coate Water Country Park and the motorway is designated for its high landscape value, its special historic and literary quality and its potential ecological value. No development will be permitted iii) Land to the west of Day House Lane will be managed as a wildlife conservation area to add value to Coate Water SSSI, Coate Water Local Nature Reserve, Day Copse Local Nature Reserve and Burderop Woods North Local Nature Reserve.

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604		2	SSP7		The policy is not justified - plenty of Brownfield alternatives exist to develop housing and employment land to meet government targets for Swindon. The land at Coate is more important to Swindon's future as an area of rural recreation and of high landscape value.	<p>Delete wording of SSP7 and replace with:</p> <ul style="list-style-type: none"> i) Up to 10 hectares of land at Commonhead will be safe-guarded for future expansion of the Great Western Hospital. ii) Land between the hospital, Coate Water Country Park and the motorway is designated for its high landscape value, its special historic and literary quality and its potential ecological value. No development will be permitted iii) Land to the west of Day House Lane will be managed as a wildlife conservation area to add value to Coate Water SSSI, Coate Water Local Nature Reserve, Day Copse Local Nature Reserve and Burderop Woods North Local Nature Reserve.
604		3	SSP7		The proposal is inconsistent with the Council's previous commitment to protect this area from inappropriate development once the Great Western Hospital was built.	<p>Delete wording of SSP7 and replace with:</p> <ul style="list-style-type: none"> i) Up to 10 hectares of land at Commonhead will be safe-guarded for future expansion of the Great Western Hospital. ii) Land between the hospital, Coate Water Country Park and the motorway is designated for its high landscape value, its special historic and literary quality and its potential ecological value. No development will be permitted iii) Land to the west of Day House Lane will be managed as a wildlife conservation area to add value to Coate Water SSSI, Coate Water Local Nature Reserve, Day Copse Local Nature Reserve and Burderop Woods North Local Nature Reserve.

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604		4	SSP7		It's not an effective policy. The area is remote from the main urban area of Swindon and cannot be integrated with the town. More land needs to be set aside for the hospital expansion to meet the health needs of a growing town.	<p>Delete wording of SSP7 and replace with:</p> <p>i) Up to 10 hectares of land at Commonhead will be safe-guarded for future expansion of the Great Western Hospital.</p> <p>ii) Land between the hospital, Coate Water Country Park and the motorway is designated for its high landscape value, its special historic and literary quality and its potential ecological value. No development will be permitted</p> <p>iii) Land to the west of Day House Lane will be managed as a wildlife conservation area to add value to Coate Water SSSI, Coate Water Local Nature Reserve, Day Copse Local Nature Reserve and Burderop Woods North Local Nature Reserve.</p>
604		5	SSP7		It is not consistent with national policy – Delivering Sustainable Development (PPS1) – by virtue of the fact that the potential damage to the ecology, to an important literary landscape, to significant archaeological features, to strategic views from the North Wessex Downs AONB & Coate Water Country Park, to Coate Water SSSI and Day House Copse Local Nature Reserve cannot be secured.	<p>Delete wording of SSP7 and replace with:</p> <p>i) Up to 10 hectares of land at Commonhead will be safe-guarded for future expansion of the Great Western Hospital.</p> <p>ii) Land between the hospital, Coate Water Country Park and the motorway is designated for its high landscape value, its special historic and literary quality and its potential ecological value. No development will be permitted</p> <p>iii) Land to the west of Day House Lane will be managed as a wildlife conservation area to add value to Coate Water SSSI, Coate Water Local Nature Reserve, Day Copse Local Nature Reserve and Burderop Woods North Local Nature Reserve.</p>

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605	1		CP10A		The canal is not justified nor required The route of this canal is along the main traffic routes in and out of Swindon - there is no consideration for the traffic who need to use this route including traffic from Rodbourne and Moredon. If you are not having a Park + Ride then this will not work - one needs a choice.	Drop the canal idea. Have a Park + Ride as near junctions of motorway and open the two we already have. Take example from Gloucester - out of town car park free for 3 hours of £1.50 all day. 75p bus fare (Trading Estate).
605	2		CP7		Point iii) New bus station is needed. The old one is a disgrace to Swindon.	New bus station alongside of railway station.
606	1		SSP7		The Government's White Paper "Communities in Control: Real Power, Real People" calls for local authorities to involve communities in the decision-making process. Policy SSP7 clearly conflicts with Government when 52,000 people have signed a petition in order to ensure that a 1km buffer of countryside is protected against development east and south of Coate Water Country Park. The council have ignored this.	Policy SSP7 should be deleted. No confidence in "respected views" from Coate Water and North Wessex Downs AONB (Point x) or protecting archaeological features if surrounded by a modern estate (Point viii). No confidence that a "robust buffer" between Coate Water and new development will be created (Point ix) because there has been no official plan to protect this margin of land.
606	2		SSP7		It's not an effective policy. The area is remote from the main urban area of Swindon and cannot be integrated with the town.	Policy SSP7 should be deleted. No confidence in "respected views" from Coate Water and North Wessex Downs AONB (Point x) or protecting archaeological features if surrounded by a modern estate (Point viii). No confidence that a "robust buffer" between Coate Water and new development will be created (Point ix) because there has been no official plan to protect this margin of land.
606	3		SSP7		More land needs to be allocated for hospital expansion to ensure space for essential healthcare in future years. Swindon is a growing town and there is a real need for expanding the hospital.	Set more land aside for expanding the Great Western Hospital.

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606		4	SSP7		It is not consistent with national policy – Delivering Sustainable Development (PPS1) – to the ecology, to an important literary landscape, to significant archaeological features, to stunning views from the North Wessex Downs AONB & Coate Water Country Park, to Coate Water SSSI and Day House Copse Local Nature Reserve cannot be secured.	Policy SSP7 should be deleted. No confidence in "respected views" from Coate Water and North Wessex Downs AONB (Point x) or protecting archaeological features if surrounded by a modern estate (Point viii). No confidence that a "robust buffer" between Coate Water and new development will be created (Point ix) because there has been no official plan to protect this margin of land.
606		5	SSP7		The proposal is inconsistent with the Council's previous commitment to not build a university nor new homes on this site..	Policy SSP7 should be deleted. No confidence in "respected views" from Coate Water and North Wessex Downs AONB (Point x) or protecting archaeological features if surrounded by a modern estate (Point viii). No confidence that a "robust buffer" between Coate Water and new development will be created (Point ix) because there has been no official plan to protect this margin of land.
607		1	SSP9 (Point ix)		The residential streets are not designed for heavy through traffic and are already dangerously congested with parked cars which could result in road traffic accidents or pedestrian injuries.	
608		1	SSP9 (Point ix)		Congestion: Residential streets are not designed for heavy through traffic and are already congested with parked cars.	
608		2	SSP9 (Point ix)		Safety: There is a matter of pedestrian safety, particularly at times when children are going to and from many local schools.	

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609		1	SSP9 (Point ix)		Addinsell Road and Eastbury Way are residential roads thus not designed for increased heavy through traffic. Both roads are already heavily congested with the parked vehicles of residents making it difficult to negotiate two-way traffic. This would become exponentially worse under the proposed junction.	
609		2	SSP9 (Point ix)		More traffic will jeopardise the safety of pedestrians and especially the young children that walk/cycle during term-time.	
610		1	SSP9 (Point ix)		Addinsell Road and Eastbury Way do not allow for heavy through traffic. At current levels congestion and accidents due to heavy on-street parking is extreme. More traffic = nightmare.	
611		1	SSP9		The roads cannot cope with the existing traffic. Additional traffic is a definite no-no.	Any new development should have its own access and separate links to the A419 and to Thamesdown Drive. Do not route traffic from additional 3000 homes through the densely packed roads in Priory Vale.
611		2	SSP9		Safety: Safety has been compromised on the grounds of encouraging walking/cycling, hence narrower roads and fewer garages. Please experience this here first before you allow more traffic through.	Any new development should have its own access and separate links to the A419 and to Thamesdown Drive. Do not route traffic from additional 3000 homes through the densely packed roads in Priory Vale. Stick to Plan A of 1500 homes.

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612	1	SSP9		The roads in Redhouse are severely restricted - residents have parked in the roads which makes it into a single lane road. It is already difficult without another 2000 residents, cars which is proposed for Tadpole Farm Estate.	<p>Tadpole to have its own access and so avoid Redhouse and Oakhurst - which have been badly planned.</p> <p>Reduce number of homes to 1500 and provide adequate garages to that on-street parking does not occur as often.</p> <p>Developers help pay cost for a new road to the north of the proposed new development.</p>
612	2	SSP9		Safety: The roads will become a rat run and they are residential with children playing.	<p>Tadpole to have its own access and so avoid Redhouse and Oakhurst - which have been badly planned.</p> <p>Reduce number of homes to 1500 and provide adequate garages to that on-street parking does not occur as often.</p> <p>Developers help pay cost for a new road to the north of the proposed new development.</p>

<i>Respondent Ref</i>	<i>Comment No. Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
613	1	SSP7		The Government's White Paper "Communities in Control: Real Power, Real People" calls for local authorities to involve communities in the decision-making process. Policy SSP7 clearly conflicts with Government when 52,000 people have signed a petition in order to ensure that a 1km buffer of countryside is protected against development east and south of Coate Water Country Park. The council have ignored this.	Delete wording of SSP7 and replace with: i) Up to 10 hectares of land at Commonhead will be safe-guarded for future expansion of the Great Western Hospital. ii) Land between the hospital, Coate Water Country Park and the motorway is designated for its high landscape value, its special historic and literary quality and its potential ecological value. No development will be permitted iii) Land to the west of Day House Lane will be managed as a wildlife conservation area to add value to Coate Water SSSI, Coate Water Local Nature Reserve, Day Copse Local Nature Reserve and Burderop Woods North Local Nature Reserve.
613	2	SSP7		It's not an effective policy. The area is remote from the main urban area of Swindon and cannot be integrated with the town. More land needs to be set aside for the hospital expansion to meet the health needs of a growing town.	Delete wording of SSP7 and replace with: i) Up to 10 hectares of land at Commonhead will be safe-guarded for future expansion of the Great Western Hospital. ii) Land between the hospital, Coate Water Country Park and the motorway is designated for its high landscape value, its special historic and literary quality and its potential ecological value. No development will be permitted iii) Land to the west of Day House Lane will be managed as a wildlife conservation area to add value to Coate Water SSSI, Coate Water Local Nature Reserve, Day Copse Local Nature Reserve and Burderop Woods North Local Nature Reserve.

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613		3	SSP7		It is not consistent with national policy – Delivering Sustainable Development (PPS1) – by virtue of the fact that the potential damage to the ecology, to an important literary landscape, to significant archaeological features, to strategic views from the North Wessex Downs AONB & Coate Water Country Park, to Coate Water SSSI and Day House Copse Local Nature Reserve cannot be secured.	<p>Delete wording of SSP7 and replace with:</p> <ul style="list-style-type: none"> i) Up to 10 hectares of land at Commonhead will be safe-guarded for future expansion of the Great Western Hospital. ii) Land between the hospital, Coate Water Country Park and the motorway is designated for its high landscape value, its special historic and literary quality and its potential ecological value. No development will be permitted iii) Land to the west of Day House Lane will be managed as a wildlife conservation area to add value to Coate Water SSSI, Coate Water Local Nature Reserve, Day Copse Local Nature Reserve and Burderop Woods North Local Nature Reserve.
613		4	SSP7		The proposal is inconsistent with the Council's previous commitment to protect this area from inappropriate development once the Great Western Hospital was built.	<p>Delete wording of SSP7 and replace with:</p> <ul style="list-style-type: none"> i) Up to 10 hectares of land at Commonhead will be safe-guarded for future expansion of the Great Western Hospital. ii) Land between the hospital, Coate Water Country Park and the motorway is designated for its high landscape value, its special historic and literary quality and its potential ecological value. No development will be permitted iii) Land to the west of Day House Lane will be managed as a wildlife conservation area to add value to Coate Water SSSI, Coate Water Local Nature Reserve, Day Copse Local Nature Reserve and Burderop Woods North Local Nature Reserve.

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613		5	SSP7		The policy is not justified - plenty of Brownfield alternatives exist to develop housing and employment land to meet government targets for Swindon. The land at Coate is more important to Swindon's future as an area of rural recreation and of high landscape value.	Delete wording of SSP7 and replace with: i) Up to 10 hectares of land at Commonhead will be safe-guarded for future expansion of the Great Western Hospital. ii) Land between the hospital, Coate Water Country Park and the motorway is designated for its high landscape value, its special historic and literary quality and its potential ecological value. No development will be permitted iii) Land to the west of Day House Lane will be managed as a wildlife conservation area to add value to Coate Water SSSI, Coate Water Local Nature Reserve, Day Copse Local Nature Reserve and Burderop Woods North Local Nature Reserve.
614		1	General		As the Regional Planning Body, we have no substantive comments to make relating to this document.	
615		1	SSP9 (Point ix)		Eastbury Way and Addinsell Road are residential roads. The Council have made no provision for this sort of traffic proposed by developers. The roads are jus not sufficiently wide to take this traffic. Vehicles are having to back up with just the local traffic that we have now.	Health and safety issues should prevail. Addinsell Road must remain a cul-de-sac and Eastbury Way an access road for local residents.
615		2	SSP9 (Point ix)		There is a real danger of accidents involving pedestrians and children using the open area, walkways and playgrounds at the top of Addinsell Road. Accidents involving children are almost certain to occur with the houses positioned near the edge of these roads. Health and safety issues should prevail.	Health and safety issues should prevail. Addinsell Road must remain a cul-de-sac and Eastbury Way an access road for local residents.

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616		1	SSP9 (Point ix)		As a resident of Smart Close which is off Addinsell Road, the impact of an estimated 1000 extra cars through an already busy Eastbury Way is unacceptable. These residential streets are not designed for heavy traffic with cars already parked down one side of the road and may lead to an increase in road traffic accidents and pedestrian casualties.	
617		1	SSP7		The Government's White Paper "Communities in Control: Real Power, Real People" calls for local authorities to involve communities in the decision-making process. Policy SSP7 clearly conflicts with Government when 52,000 people have signed a petition in order to ensure that a 1km buffer of countryside is protected against development east and south of Coate Water Country Park. The council have ignored this.	Delete wording of SSP7 and replace with: i) Up to 10 hectares of land at Commonhead will be safe-guarded for future expansion of the Great Western Hospital. ii) Land between the hospital, Coate Water Country Park and the motorway is designated for its high landscape value, its special historic and literary quality and its potential ecological value. No development will be permitted iii) Land to the west of Day House Lane will be managed as a wildlife conservation area to add value to Coate Water SSSI, Coate Water Local Nature Reserve, Day Copse Local Nature Reserve and Burderop Woods North Local Nature Reserve.

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617		2	SSP7		It's not an effective policy. The area is remote from the main urban area of Swindon and cannot be integrated with the town. More land needs to be set aside for the hospital expansion to meet the health needs of a growing town.	<p>Delete wording of SSP7 and replace with:</p> <p>i) Up to 10 hectares of land at Commonhead will be safe-guarded for future expansion of the Great Western Hospital.</p> <p>ii) Land between the hospital, Coate Water Country Park and the motorway is designated for its high landscape value, its special historic and literary quality and its potential ecological value. No development will be permitted</p> <p>iii) Land to the west of Day House Lane will be managed as a wildlife conservation area to add value to Coate Water SSSI, Coate Water Local Nature Reserve, Day Copse Local Nature Reserve and Burderop Woods North Local Nature Reserve.</p>
617		3	SSP7		It is not consistent with national policy – Delivering Sustainable Development (PPS1) – by virtue of the fact that the potential damage to the ecology, to an important literary landscape, to significant archaeological features, to strategic views from the North Wessex Downs AONB & Coate Water Country Park, to Coate Water SSSI and Day House Copse Local Nature Reserve cannot be secured.	<p>Delete wording of SSP7 and replace with:</p> <p>i) Up to 10 hectares of land at Commonhead will be safe-guarded for future expansion of the Great Western Hospital.</p> <p>ii) Land between the hospital, Coate Water Country Park and the motorway is designated for its high landscape value, its special historic and literary quality and its potential ecological value. No development will be permitted</p> <p>iii) Land to the west of Day House Lane will be managed as a wildlife conservation area to add value to Coate Water SSSI, Coate Water Local Nature Reserve, Day Copse Local Nature Reserve and Burderop Woods North Local Nature Reserve.</p>

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617		4	SSP7		The proposal is inconsistent with the Council's previous commitment to protect this area from inappropriate development once the Great Western Hospital was built.	<p>Delete wording of SSP7 and replace with:</p> <ul style="list-style-type: none"> i) Up to 10 hectares of land at Commonhead will be safe-guarded for future expansion of the Great Western Hospital. ii) Land between the hospital, Coate Water Country Park and the motorway is designated for its high landscape value, its special historic and literary quality and its potential ecological value. No development will be permitted iii) Land to the west of Day House Lane will be managed as a wildlife conservation area to add value to Coate Water SSSI, Coate Water Local Nature Reserve, Day Copse Local Nature Reserve and Burderop Woods North Local Nature Reserve.
617		5	SSP7		The policy is not justified - plenty of Brownfield alternatives exist to develop housing and employment land to meet government targets for Swindon. The land at Coate is more important to Swindon's future as an area of rural recreation and of high landscape value.	<p>Delete wording of SSP7 and replace with:</p> <ul style="list-style-type: none"> i) Up to 10 hectares of land at Commonhead will be safe-guarded for future expansion of the Great Western Hospital. ii) Land between the hospital, Coate Water Country Park and the motorway is designated for its high landscape value, its special historic and literary quality and its potential ecological value. No development will be permitted iii) Land to the west of Day House Lane will be managed as a wildlife conservation area to add value to Coate Water SSSI, Coate Water Local Nature Reserve, Day Copse Local Nature Reserve and Burderop Woods North Local Nature Reserve.

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618		1	SSP7		Council has ignored the majority view of 52,000 objectors to Coate development, contrary to the advice in the Government's White Paper "Communities in Control: Real Power, Real People - 2008" . The majority view has been ignored.	Policy SSP7 should be deleted. No confidence in "respected views" from Coate Water and North Wessex Downs AONB (Point x) or protecting archaeological features if surrounded by a modern estate (Point viii). No confidence that a "functional and robust buffer" between Coate Water and new development will be created (Point ix) as the land-use has not been designated under other policies.
618		2	SSP7		It's not an effective policy. The area is remote from the main urban area of Swindon and cannot be integrated easily. More land needs to be set aside for the hospital expansion.	Policy SSP7 should be deleted. No confidence in "respected views" from Coate Water and North Wessex Downs AONB (Point x) or protecting archaeological features if surrounded by a modern estate (Point viii). No confidence that a "functional and robust buffer" between Coate Water and new development will be created (Point ix) as the land-use has not been designated under other policies.
618		3	SSP7		It is not consistent with national policy – Delivering Sustainable Development (PPS1) – by virtue of the fact that the potential damage to the ecology, to significant archaeological features, to strategic views and to Coate Water SSSI	Policy SSP7 should be deleted. No confidence in "respected views" from Coate Water and North Wessex Downs AONB (Point x) or protecting archaeological features if surrounded by a modern estate (Point viii). No confidence that a "functional and robust buffer" between Coate Water and new development will be created (Point ix) as the land-use has not been designated under other policies.

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618		4	SSP7		It is inconsistent with SBC's former commitment to protect this area from inappropriate development once the Great Western Hospital was built.	Policy SSP7 should be deleted. No confidence in "respected views" from Coate Water and North Wessex Downs AONB (Point x) or protecting archaeological features if surrounded by a modern estate (Point viii). No confidence that a "functional and robust buffer" between Coate Water and new development will be created (Point ix) as the land-use has not been designated under other policies.
618		5	SSP7		The policy is not justified - plenty of alternatives exist and this land is more important to Swindon's future as an area of rural recreation and of high landscape value.	Policy SSP7 should be deleted. No confidence in "respected views" from Coate Water and North Wessex Downs AONB (Point x) or protecting archaeological features if surrounded by a modern estate (Point viii). No confidence that a "functional and robust buffer" between Coate Water and new development will be created (Point ix) as the land-use has not been designated under other policies.
619		1	SSP9 (Point ix)		Eastbury Way and the residential roads in Oakhurst and Redhouse are not designed for heavy through traffic. The area is already congested with parked cars and the bus route becomes more difficult week by week. Already we see cars parked on grass verges and paved areas and in lowering the values of the area. More congestion will result in further "off-road" parking.	

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620		1	SSP9 (Point ix)		Safety - this is an area with many young children and the increased traffic puts them at risk.	<p>It was right to close Lady Lane and also to keep junction 6A open. These good decisions would be totally useless if all this increased traffic was sent through Redhouse. I appreciate that new homes are needed but this should not impact on residents in another existing area.</p> <p>A new road will be needed, possibly the Purton Road area is a possible new route that would solve the problem?</p>
620		2	SSP9 (Point ix)		Congestion: There is already a huge problem with congestion with parked cars blocking half the road and roundabouts.	<p>It was right to close Lady Lane and also to keep junction 6A open. These good decisions would be totally useless if all this increased traffic was sent through Redhouse. I appreciate that new homes are needed but this should not impact on residents in another existing area.</p> <p>A new road will be needed, possibly the Purton Road area is a possible new route that would solve the problem?</p>
620		3	SSP9 (Point ix)		Noise: This is an area where many houses do not have front gardens, so increased traffic will mean much increased noise.	<p>It was right to close Lady Lane and also to keep junction 6A open. These good decisions would be totally useless if all this increased traffic was sent through Redhouse. I appreciate that new homes are needed but this should not impact on residents in another existing area.</p> <p>A new road will be needed, possibly the Purton Road area is a possible new route that would solve the problem?</p>

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620		4	SSP9 (Point ix)		Redhouse is completely residential with a lot of traffic. No studies have been done recently of the traffic volumes already going through the area.	<p>It was right to close Lady Lane and also to keep junction 6A open. These good decisions would be totally useless if all this increased traffic was sent through Redhouse. I appreciate that new homes are needed but this should not impact on residents in another existing area.</p> <p>A new road will be needed, possibly the Purton Road area is a possible new route that would solve the problem?</p>
620		5	SSP9 (Point ix)		No residential area should be used as a through road.	<p>It was right to close Lady Lane and also to keep junction 6A open. These good decisions would be totally useless if all this increased traffic was sent through Redhouse. I appreciate that new homes are needed but this should not impact on residents in another existing area.</p> <p>A new road will be needed, possibly the Purton Road area is a possible new route that would solve the problem?</p>
621		1	CP4		This strategy has been in preparation for 5 years and over the latter period has not been revised. The retail sector with all the proposed additional square metres will never happen. A demand for affordable housing which won't be satisfied by the suggestions made in this document.	Let the market place determine your development targets. Put your proposals in the deep-freeze and re-submit them to the public in 20 years time when they might even be relevant.

<i>Respondent Ref</i>	<i>Comment No.</i>	<i>Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
622		1	SSP9 (Point ix)		<p>A link through the residential streets of Redhouse is a totally impractical solution, especially considering the known problems at Junction 6A of Thamesdown Drive. With the inadequate provision of parking spaces throughout the area the inevitable street parking creates long sections of single lane traffic.</p> <p>We understand that the Redhouse link would enter the Holland roundabout creating a major traffic flow at peak periods (3000 vehicles on Tadpole Farm through Addinsell Road and Eastbury Way to junction 6A of Thamesdown Drive). This traffic flow of "all modes of transport" will undoubtedly include commercial vehicles to/from the 5 hectares of Tadpole Farm business developments. The safety aspects are a major concern.</p>	The residents of Redhouse repudiate this aspect of the Core Strategy.
623		1	SSP9		<p>We completely object to Tadpole Lane being changed into a major traffic route of any kind. Increased traffic on this road will lead to environmental degradation for houses that line Tadpole Lane. It would cause increased pollution levels, increased noise levels and increased danger from higher traffic levels.</p>	

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623		2	SSP9		<p>Traffic: 2000 new homes would lead to a huge increase in daily traffic levels. To pipe it all through Redhouse/Oakhurst is a disastrous idea. These residential streets are designed to be narrow, and yet they are already completely congested with parked cars.</p> <p>Rush hour is currently completely congested with queued up slow moving traffic, particularly Thamesdown Drive. How can they absorb more traffic? There are already worrying concerns for the ability of ambulances and fire engines to get through.</p> <p>Increased air pollution will decrease local air quality and destroy the ambience of residential streets in Redhouse/Oakhurst.</p> <p>It is already widely documented that people will not give up their private cars regardless of the public transport provided.</p>	Further development in the north of Swindon will bring the whole area down.
623		3	SSP9		<p>The UK Government has told us we should be aware of the consequences of not adopting a greener lifestyle, yet this proposed development will add to our carbon footprint with increased traffic level and related outputs. There are legally binding European Environmental targets that need to be met in the coming years.</p>	
623		4	SSP9		<p>With such a huge development proposed, is the associated infrastructure in place? For example: sewage, drainage, anti-flood systems?</p> <p>Huge demands for schools, doctors, dentists, youth facilities, parks, open space.</p>	Choosing the site just because it won't cause builders too many problems is a very poor reason. What guarantees are there with regards to providing adequate levels of provision. Who will provide these?

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623	5		SSP9		We understand that there is existing ground contamination on an area of the proposed development site.	Will this be safely cleaned up?
623	6		SSP9		We object to the level of 35% affordable housing. We see this as far too excessive, given the size of the development.	
624	1		SSP9 (Point ix)		The roads through Redhouse and Oakhurst are bursting to capacity at all times of the day with traffic and residents parking. The roads cannot cope and are not designed to do so.	
624	2		SSP9 (Point ix)		Safety: Pedestrian safety and especially children's' safety is paramount. Whilst walking my children to/from Redoaks School, I have first-hand knowledge of the traffic - I am of the opinion that these roads are an accident waiting to happen. A new children's play park is nearly completed at the top of Addinsell Road where the "new link road" will be built. Again, children's safety is paramount.	
625	1		SSP7		The proposal of 750 houses should be reduced to no more than 500 houses and not permit development on land of archaeological importance. This should include Day House Copse which is recognised as an ancient oak woodland.	The proposal of 750 houses should be reduced to no more than 500 houses and not permit development on land of archaeological importance. This should include Day House Copse which is recognised as an ancient oak woodland.
625	2		SSP7		We support the allocation of 5.5 hectares for future hospital expansion. This should however be increased to account for the further 35,000 homes proposed	Increase the 5.5 hectare allocation for hospital expansion.
625	3		DMP8		Policies DMP8 and CP10 should be increased to include all land south of Day House Lane to provide a buffer zone to Coate Water Country Park - which will need to be legally protected to ensure that no further development takes place.	Policies DMP8 and CP10 should be increased to include all land south of Day House Lane to provide a buffer zone to Coate Water Country Park - which will need to be legally protected to ensure that no further development takes place.

<i>Respondent Ref</i>	<i>Comment No.</i>	<i>Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
625		4	SSP7		Day House Lane should be closed as a through road at its most southerly point - in order to protect Badbury Village and Badbury Wick hamlet becoming a "rat-run" for traffic accessing Swindon and the proposed 15 hectares of employment land.	Day House Lane should be closed as a through road at its most southerly point - in order to protect Badbury Village and Badbury Wick hamlet becoming a "rat-run" for traffic accessing Swindon and the proposed 15 hectares of employment land.
625		5	CP11		We are opposed to any increase in transit sites at 'The Firs, Chiseldon'. The village (particularly the village shop) has suffered anti-social behaviour and the site residents frequently use the Sustrans cycle way as a toilet. Cyclists and walkers are reluctant to pass the site because they suffer from unruly dogs. Security is poor because the site is secluded from view and subject to police activity. Access to the site is dangerous being on the crown of a hill on the busy A346 Swindon/Marlborough road.	The additional 5 pitches proposed should be located elsewhere in Swindon Borough
626		1	SSP7		This peninsula of urban development is isolated from the rest of Swindon. Its location next to two major roads (M4 and A419) encourages a car-dependent lifestyle, particularly for lower paid commuters to Bath or Newbury for example. The noise of these roads will also discourage walking and cycling amongst local residents.	Housing should not be located in where it will encourage local residents to follow unsustainable lifestyles.
626		2	SSP7		The proposal of 750 new homes is too small to form a sustainable community. One cannot increase the proposed development without invading the buffer around Coate Water Country Park, which would threaten the SSSI and the rural feel.	

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626	3		SSP7		It is unlikely that retail businesses would succeed and be sustainable. Chiseldon has over 1,000 households - however the only 2 shops it supports survive because of sales to THROUGH traffic - this would not exist at Commonhead.	
626	4		SSP7		School Provision The are no existing primary or secondary schools in the locality. The catchment for this particular development on its own would be on the small side.	
626	5		SSP7		The area is unsuitable for housing. It is regrettable that the site is not being developed in a way that utilises its attributes - N. Wessex AONB, country park, ancient monuments and historical connections.	It would be more appropriate to develop it is a tourism and leisure facility so long as it did not threaten the SSSI buffer.
627	1		SSP9 (Point ix)		The original design of Eastbury Way and Addinsell Road can just about cope with volume as it stands. 1000 Extra vehicles, of which not all will be family cars, will add pressure to a an already busy built-up residential area. The whole impact, idea and general safety of our residents is unsound.	Careful and constructive thought must prevail.
628	1		General		The Parish Council consider that the Core Strategy is based on aspirational ideals rather than evidence base methods of analysis.	
628	2		General		The Council has concerns regarding flooding and transport matters and the ever increasing over development of the Parish and surrounding areas.	

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628		3	General		The Core Strategy is fundamentally flawed as it is unfocused without consideration of a staged process for development.	
628		4	General		The disruption that will be caused by allowing development of more than one area at a time	
628		5	CP3		Where the creation of jobs is coming from. In the present economic climate it appears unrealistic to build houses to balance out the 32,000 new jobs which may or may not be created.	
628		6	CP3		The need for houses is being based on the creation of jobs. Clear evidence based on the levels of new jobs should be given before considering house building.	
628		7	CP7		There is a lack of information in the Core Strategy regarding the transport system that will be necessary to support the proposed development and how these are to be made economically viable.	
628		8	CP7		The Parish Council is concerned that the transport infrastructure will be insufficient in providing the town centre without causing significant road congestion on existing roads. This results in residential roads being overloaded and becoming 'rat runs'	
628		9	DMP1A		There already exists areas of flood risk in Lower Stratton. The Core Strategy does not consider the impact that such massive building to the East of Swindon will have on flood areas.	

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628		10	CP7		The proposed transport alterations at the White Hart junction could see the removal of the White Hart Allotments. The need for allotments within the parish is high and the Parish Council has a waiting list. Will the Council be setting aside land for this purpose?	
628		11	CP10		The lack of important open space or green wedges that are being identified within the proposals.	
629		1	SSP8		The EDA is contrary to Government Policy which was outlined by Gordon Brown during Prime Minister's Question Time on 3 June, reiterating that national policy was to develop brownfield sites and not fertile land. The EDA represents the foreground to the Wessex Downs AONB which the Swindon Joint Study acknowledged should be protected as a critical area. SSP8 contravenes PPS1.	
629		2	SSP8		PPS1 emphasises the importance of flood risk and the provision of infrastructure, and PPS25 is devoted to flood risk. By continuing to promote the EDA knowing that there is no assurance that any money will be available to provide the necessary infrastructure and that the area includes a large floodplain, SBC is acting in direct breach of both policies.	

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629

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CP2, CP7

The creation of a 12,000 house development on open unspoilt countryside cut off from the rest of Swindon by a major trunk road can only be described as an isolated satellite town. The costs of crossing the A419, of improving the White Hart Junction, of upgrading the A420 and providing tunnels under the railway line are truly enormous. SBC has no idea whether these schemes are affordable or where the funds are to come from, and government funding cannot be guaranteed bearing in mind that 650,000 houses are to be built in the South East region and a similar amount in the South West region between now and 2026. Central government bodies such as the Highways Agency and Thames Water made it plain at the EIP into the RSS that they have no funds for this purpose. SBC admitted in its Transport Strategy that it would be unable to extract enough money from commercial developers to finance even the limited number of crossing of the A419 trunk road which the Core Strategy proposes. Clearly the proposals are neither affordable not deliverable.

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629		4	CP7, SSP8		CP7, SSP8 and the "Implementation and Monitoring Plan" all identify A420 access as a key infrastructure requirement for the EDA, but then the submission document includes no details of transport infrastructure onto the A420. The Core Strategy is not justified because the evidence base is incomplete as it does not assess the impact of significant additional traffic from the EDA on the A420 in Oxfordshire; and not consistent because the South East Plan identifies the A420 as a "regional spoke" but the submission document does not include explicit measures to support this role.	
629		5	SSP8	3.64	With regard to the strategic buffer on the eastern side of the EDA, the submission document accepts that a strategic buffer is needed (para 3.64), but then does not show it on Figure 16. The Core Strategy does not set out how the strategic buffer will be delivered, and does not include the most appropriate strategy.	

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629		6	SSP8		<p>SBC is falling short of the Draft RSS requirements for it to identify strategic gaps in their development documents to ensure that surrounding settlements do not coalesce with the Swindon Urban Area. Even though the huge development of 12,000 houses is to be built less than one mile from the conservation village of Bourton, there is no provision for strategic gaps. This is in breach of undertakings given by SBC elected members and officers to representatives of the villages of Bourton and Wanborough. SBC has made repeated assurances over many years that the character and integrity of these places would be secured. It is arguable that the giving of these undertakings and assurances created a legitimate expectation in law that they would be honoured. Instead SBC are trying to negate their responsibilities as the promoter of the EDA by suggesting that Oxfordshire authorities are responsible for protecting the character and identity of Bourton, and in doing so SBC has contravened its own guidance. It is crucial that strategic gaps are provided, not only for the above reasons but also to alleviate the effect of the EDA on the views from the Wessex Downs AONB. SBC's plans to allow densities of 44-55 dwellings per hectare within developments closest to the village is certainly not an acceptable solution.</p>	

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629		7	SSP8		Despite the fact that this is the largest development in the South West, it is covered in only 8 pages of the Core Strategy. SBC appears to be trying to get this huge development through the planning stages without detailed inspection or enquiry. We believe it is essential to subject this proposal to an Area Action Plan otherwise SBC are depriving the surrounding community of its rights, under the LDF, to have a very real say in the planning policy which will affect their lives for many years to come.	
629		8	SSP8		Bourton Parish Council and the Consortium of Western Vale Villages has consistently argued that if SBC wished to build and integrate an additional 12,000 dwellings with the existing town it must necessarily locate the development to the north or west where most of the necessary infrastructure already exists that would enable alternative development sites to be brought forward within much quicker timescales and within considerably less impact. There would be less effect on the wider landscape, in particular the Wessex Downs AONB. It will be almost impossible to integrate a single development of 12,000 houses within the existing town. This was acknowledged by SBC in 1999 in the Swindon Development Appraisal, when the proposed development to the East of Swindon was only proposed to be 6,000 dwellings.	
630		1	DMP4B		Part v) of the policy should be reworded from 20% of dwellings in the postcode to 2% of dwellings in the postcode. Having the cap at 20%, if realised, would totally change the character of neighbourhoods.	

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631		1	SSP8		In its 'Notes to Accompany Representations' form SBC identifies two relevant elements: (1) Participation by the local community and 'others having a stake in the area'. The latter are not identified, but are taken to include development companies and others who control land in the area affected. (2) The choices made in the Core Strategy are backed up with facts. The Core Strategy fails on both counts.	
631		2	SSP8		To be effective local participation requires not only that local communities shall offer views on proposed policies, but also that SBC shall consider those views genuinely and objectively. On this the Council has signally failed to deliver. Nowhere in the Core Strategy is there any indication that SBC is even aware of widespread opposition to SSP8, not only in the villages, but also in urban areas of the town such as Stratton, Covingham and Dorcan. The latter will be directly affected by the traffic which the Core Strategy seeks, deliberately, to attract from the EDA, if built, into the centre of Swindon (para C iv)).	
631		3	SSP8		Western Vales Villages Consortium has been concerned to preserve the character and separate identities of its constituent villages. The CS pays this lip service (see para C iii); para 3.64), but the reality is different. Figure 16 shows the proposed development blocks physically impinging on outlying parts of Lower Wanborough, and extending up to the Borough boundary in the direction of Bourton. This follows repeated assurances that the character and integrity of these places, among others, would be secured.	

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631		4	SSP8		Officers have sought to justify the CS proposals by arguing that SBC consultants recommend that future development should be located where the CS shows them, and that regard must be had to those recommendations. They have also contended that it is in any event the responsibility of planning authorities in Oxfordshire to safeguard Bourton by adopting appropriate planning policies. This is both disingenuous and wrong.	
631		5	SSP8		SBC may be bound to take account of its consultants' views, but is not obliged to follow them slavishly, especially where this would result in breaching of undertakings which were at least accepted in good faith. Further, it is arguable that the giving of those undertaking created a legitimate expectation in law that they would be honoured. To suggest that Oxfordshire authorities are responsible for protecting the character and identity of Bourton negates SBC's responsibilities as the promoter of the EDA, and is irreconcilable with the pious promises made in para 3.64.	

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631		6	SSP8		There are four facts which SBC has been unable to overlook entirely, and which are inescapable. These are: (1) the EDA is severed from the rest of Swindon by the A419 trunk road, a major physical and psychological barrier (para C iv)); (2) the area floods seriously and increasingly often (para C ii)) and has been found to be of all possible expansion sites the one at greatest risk of flooding; (3) the highway network surrounding the proposed EDA is already overloaded, particularly the A420 and M4 J15 and; (4) the proposed EDA is closer to the Wessex Downs AONB than any other area in which Swindon could expand.	
631		7	SSP8		WVW repeats their conclusion that the draft RSS and SSP8 (which derives from the RSS) are fundamentally misconceived. Put another way, there are no facts to support SSP8, and many to refute it.	If major expansion of Swindon is to occur at all, it should do so elsewhere.

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631		8	SSP8		<p>The CS purports to meet the difficulties raised by the four facts with a series of assurances, none of which is backed up with practical suggestions. An example of this is para 3.61. There, SBC claims to be '... keen that the EDA is of exemplar design and quality, and where possible incorporate innovative and sustainable features'. Whether this is more than empty rhetoric can be tested against the Council's record in securing good design in the areas of the town built since major expansion began in the 1950's. That record has been lamentable, as even a brief tour of those areas will reveal. The quality of housing currently emerging at Wichelstowe further attests the continuing inability of SB to guarantee high quality design in major new schemes. The prospects for the EDA are dispiriting.</p>	

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631		9	SSP8		<p>It has been apparent since the RSS was first formulated, and remains true, that the costs of highway improvements, removal of flood risk, and open space provision, among other things, will be enormous. It is increasingly clear that SBC has never had, and still does not have, the remotest idea of how the infrastructure costs of the proposed EDA are to be met. Central Government bodies such as the Highways Agency, and utilities suppliers such as Thames Water, made it plain at the EIP into the RSS that they have no funds for the purpose. In its Transport Strategy SBC admitted that it would be unable to extract enough money from commercial developers to finance even the limited number of crossings of the A419 trunk road which the CS proposes. Although repeatedly urged to indicate where the necessary money for any of the infrastructure costs might conceivably be found, SBC has been wholly unable to do so. The inescapable conclusion is that SSP8 is wholly ineffective in this respect.</p>	

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SSP8

It is of interest that in 1999, following a careful study of many possible sites for future expansion of the town, the Swindon Development Appraisal concluded that development of 6,000 dwellings (half the size of the EDA) would be too large to integrate successfully with the rest of the urban area, including the town centre. In the decade which has since elapsed the only material fact which has changed is that traffic on the A419 has increased substantially. This has increased the difficulty and cost of providing links across that road. The vacillation in SBC's views cannot be the result of valid planning considerations, but has been brought about by irrelevant political pressures.

631

11

SSP8

SSP8 contravenes many national planning policies. One needs to look no further than PPS1 for confirmation of this, where paragraphs 1 and 4 both point out the importance of conserving and protecting the environment. SSP8 proposes the covering of several hundred hectares of unspoilt country with bricks, concrete and tarmac, close to an AONB.

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631		12	SSP8		PPS1 para 20 emphasises the importance of flood risk and the provision of infrastructure, and this is reinforced by the existence of PPS25, devoted to flood risk. PPS1 para 23 states that 'Planning Authorities should... (viii) ENSURE THAT INFRASTRUCTURE AND SERVICES ARE PROVIDED to support new and existing economic development and housing' (emphasis added). By continuing to promote the EDA, knowing that there is no assurance that any money will be available to provide the necessary infrastructure, SBC is acting in direct breach of both policies.	
631		13	SSP8		PPS1 para 40 stresses the importance of community involvement in planning and the achievement of sustainable development. This should involve more than informing local communities of what is intended, purporting to listen to their concerns, and ignoring them. The preparation of the CS is accordingly in breach of this element of national policy.	
631		14	SSP8		SBC concedes that its proposals must have the support of 'delivery partners who are signed up'. It is assumed that this refers not only to commercial developers but also to providers of utilities and other infrastructure required for the proposed EDA. It is evident that no such provider has agreed in principle to play its part in the future development, still less signed up to do so.	

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631	15		SSP8		The CS is not coherent with the strategies of either of the neighbour authorities, Oxfordshire CC and the Vale of the White Horse DC. Both objected in the past to the concept of the EDA, for differing reasons, and have not (so far as WVV is aware) withdrawn their objections. By abandoning responsibility for providing strategic gaps between the proposed urban development and the villages, leaving this to the Oxfordshire authorities, SBC has contravened its own guidance.	
631	16		SSP8		The CS gives no clear indication of who is to implement its policies. This is not surprising, given the absence of any infrastructure funding and of any practical proposals for solving the problems which the EDA will create.	
631	17		SSP8		It should not be forgotten that the Secretary of the State has not approved the RSS. Each successive attempt by SBC to pre-empt that decision succeeds only in demonstrating the wisdom of proposing the EDA and the impossibility of achieving what the CS intends.	
632	1	xxiii	General		"Encouraging people to get involved in the decisions that affect their community". We accept this as a worthwhile aim, however there is no indication of responsibility for making this happen and no mechanism specified. We believe that Parish Councils are a tried and tested method of delivery.	
632	2	xxvi	General		We support the concept of integrated delivery of services as part of the 'Connecting People Connecting Places' strategy.	

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632	3	xxvi	General		<p>We are immensely concerned about the effect of 'clusters' as part of the 'Connecting People Connecting Places' strategy. The cluster in which South Marston parish is grouped appears to have little geographic or social justification in terms of shared identity or views. It appears to be a 'top-down' concept that bears no relation to the socio/political structure and needs of parished communities. Our view is that it will at best be irrelevant and at worst detract from the roles of both Parish Councils and Ward Councillors. It will weaken community involvement in favour of administrative convenience, in contravention of the Sustainable Communities agenda.</p>	<p>References in the Core Strategy, EDA SPD and supporting documents point to the need for independent-minded local communities, able to better deliver local services with a sense of local character, but despite this the Core Strategy and supporting documents make little acknowledgement of Parish Councils. We believe that Parish Councils already provide a good solution.</p> <p>We ask that the Connecting People Connecting Places agenda be restated along sound principles and that a commitment is made to consult on strategy and implementation.</p> <p>In addition to paragraph xxvi we ask that the following paragraph be inserted:</p> <p>(Addition after xxvi) "This will include support for existing Parish Councils and recognition of the key role that they can play in community empowerment and decisions relating to their area. New Parish Councils should be established for each new community as soon as a viable population is reached in order to foster a sense of political identity, engender community activity, manage local facilities and liaise with the Borough".</p>
632	4		SO8		<p>"Growth at Swindon will have occurred in a way that respects and enhances its historic environment".</p>	<p>In order to achieve this a monitoring indicator should be included to ensure that the physical developments respect both urban and rural historic features. We suggest retention and restoration of historic built and landscape features.</p>

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632	5		SO10		The strategic objectives, generally, and in particular SO8 and SO10, fail to sufficiently respect, integrate and develop the rural elements of the Borough. This section should link to Policy DMP6 on the historic environment and DMP8 on green infrastructure.	Change as follows: By 2026, building on its green assets and retaining and restoring historic features where practical, Swindon will sit at the heart of a far-reaching network of connected and multi-functional open spaces, which provide an attractive and inspirational environment to live, work, learn and play.
632	6	2.9	CP2		We dispute the definitions of 'hard' and 'soft' infrastructures. The examples of 'soft' infrastructure are all building based and are therefore 'hard'. There needs to be adequate support for building social infrastructure so that cohesive communities can develop. The omission of the need to build for social infrastructure renders CP2 unsound.	
632	7		CP1		Parish Councils are an efficient method of delivery that is largely supported by the community itself. Our understanding is that the Borough will increasingly look towards subsidiary agreements (to manage most recreation and social facilities in Parished areas). The failure to consult Parish and Town Councils or to otherwise canvas local opinion on this list (of implementation partners) renders the policy not legally compliant.	Parish and Town Councils should be explicitly included in the list of implementation partners.
632	8		CP3		This policy should not prevent the re-designation of inappropriate sites.	The villagers of South Marston are keen that the wartime industrial development at Thornhill Industrial Estate and Crown Timber be redeveloped as allowed in DMP3 Para B.

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632	9	2.73	CP5		There is a lack of clarity as whether there is to be a new food store in addition to the existing Sainsbury's.	
632	10	vi	CP6		Existing communities (such as South Marston) already provide facilities such as village halls. If the local use and cost of maintenance of facilities in the community are to be optimised, it is essential that some of the 'locality based teams and multiple agencies' work with the community providers of facilities.	If the local use and cost of maintenance of facilities in the community are to be optimised, it is essential that some of the 'locality based teams and multiple agencies' work with the community providers of facilities.
632	11	vi	CP6		Without Parish Council involvement it is not clear who the community use agreements will be with.	
632	12	vi	CP6		It may be that 'locality based teams and Multi Agency working' will make the servicing of a dependency culture more efficient, but the fostering of robust local communities with less need for such input should be a priority.	
632	13	2.101	CP7		Please clarify that this policy includes communications internal to communities, as well as strategic routes	
632	14	2.101	CP7		"20 mph speed limit in residential areas".	"20 mph speed limit in residential areas" add "to include all villages and rural settlement centres where proposed by the local community through the relevant Town or Parish Council".

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632	15	2.105	CP7		"Key Point at South Marston is a good example of how freight movement can be achieved by rail". This is untrue. Keypoint is and always was a speculative warehouse development and it was a naïve decision that should never have been permitted. None of the site occupiers have ever used the rail facility. Honda have used it once or twice but claim that it is too small to accommodate a full train.	
632	16	2.105	CP7		"The ability to maintain and enhance the existing rail terminal has been identified as vital to the future transport requirements for both passenger and freight use". We are amazed by this statement. No supporting evidence is provided to support this statement. We cannot see that there is physical room for any extension or extended use.	
632	17	2.107	CP7		The first sentence identifies a problem for all small scale urban extensions.	
632	18	2.107, 2.108	CP7		The balance of 2.107 and 2.108 refer to a strategic route serving the North and West of Swindon only.	This content should all be placed in 2.108 and re-headed "North and West Transport Links". As such as a route will not help other areas (e.g. Commonhead), there should be a specific undertaking to address the problem.
632	19	vi	CP8			Add "in conjunction with existing community facilities where appropriate. Local communities will be consulted on the facilities to be provided and involved in the decisions on multi-functional use, particularly where it impacts on adjacent community-owned facilities".

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632	20	2.131	CP9		The proposed use of extended schools as multi-agency centres is best done in a wider local community context in order to foster community building and ultimately, less need for formal service provision.	
632	21	2.142	CP9		"The Council will continue to work with all its partners responsible for community, health, education and safety within the Borough to ensure to support the objective of creating sustainable communities". The lack of a clear strategy for community capacity building to involve local people and integrate community owned facilities hampers the creation of sustainable communities.	
632	22		CP10			It would be useful to include Community Forest in Figure 7.
632	23	2.147	CP10			Typo - Great Western Community Forest (GWCF not GWFC).
632	24		CP10		We are concerned that there is no provision for additional allotment space in the proposed developments.	We would wish to see a commitment to community food production facilities as part of the ecologically sustainable theme as part of the Swindon Climate Chance Action Plan
632	25		CP10			Extension and enhancement of the Community Forest project provides a suitable approach to strengthen the commitment to provide green spaces of enhanced value, and this should be more overtly mentioned, particularly in relation to the new Swindon growth areas).
632	26	2.158	CP10		Historically the canal was dogged by a lack of adequate headwater, and until there is evidence that this problem has been overcome we suggest this policy is unsound.	

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632	27	B	SSP8			Change: "Proposals for the EDA must provide" to "Proposals for the EDA must provide for"
632	28	B vii	SSP8			Change "GP Surgery" to "Health Centre making provision for GP Surgery, dentist and pharmacy" in line with the proposals at 11.4 of the EDA SPD.
632	29	B viii	SSP8		Some communities may be too small to support local shops given the proximity of the district centre and the existing convenience store at the petrol station on the A419.	Change "For 5 mixed-use neighbourhood centres, including one at South Marston, co-located with a primary school to create local community hubs, comprising local shops and facilities, and making a provision for a Multi-Agency Centre/Community Use Facility and a GP Surgery in at least one of the neighbourhood centres" to "5 mixed-use neighbourhood centres, including one at South Marston, co-located with a primary school to create local community hubs, comprising local facilities, and to include shops and services where these can be demonstrated to be economically viable. The provision at South Marston will be integrated with the existing community owned facilities in partnership with the local community A Multi-Agency Centre/Community Use Facility and a GP Surgery will be provided in at least one of the neighbourhood centres".
632	30	C vi	SSP8		The decision not to have a strategic road between Acorn Bridge and Commonhead has been made without the benefit of a study for the effect of the EDA.	Actions mentioned in 4.54; Transport Assessment/Transport Statement and accompanying Travel Plan.

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632	31	D ii, 3.65	SSP8		Current wording of D ii) assumes a single EDA identity. This is at odds with the structure of the EDA as set out at 3.65 which uses words and phrases such as "different parts of the site" and "communities". The policy is ambiguous.	Change "Design Codes must be produced to control the physical development of the site and in particular should focus on creating a clear sense of identity and character" To "Design Codes must be produced to guide and control the physical development of the site and in particular should focus on creating linked communities each with a clear sense of identity and character".
632	32		SSP8		SSP8 ignores the need to build community capacity within the EDA, which is necessary in order to fulfil the Sustainable Communities Agenda. The policy needs amendment to cater for building community capacity for two reasons: (1) Area is divided into different segments by physical features (railway line, roads and flood plains); (2) The large parishes of Covingham and Stratton lie between the EDA and Central Swindon. These are of a similar size to the EDA but do not have the physical and cultural divisions of the kind proposed by the EDA.	
632	33	C	SSP8			Additional text "New neighbourhood organisations within the EDA will be required to enable the new communities to develop their own identity and manage their own community facilities and service. This should be developed through partnership working between the Borough Council and existing Parish Councils serving the area.

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632	34	3.69, 3.70	SSP8			<p>Additional text:</p> <p>"The planned SPD on infrastructure requirements for the EDA will include costs associated with:</p> <ul style="list-style-type: none"> - Building social capital to create a series of neighbourhoods within the EDA, each with distinct identities and each providing for their own governance. - Enabling neighbourhood organisations thereby created to work in partnership with the Borough to manage community facilities and deliver community-based services".
632	35	I	SSP13		SMPC agree with this.	
632	36	I	SSP13		This cannot be achieved without an SPD for South Marston.	
632	37	iii	SSP13		The village is a hotchpotch in terms of character and form and this can be improved on. Example of unsatisfactory form are the junction at Pound Corner and the cul-de-sac developments that separate rather than combine elements of the community.	Change to "Expansion of South Marston must complement the character and form of the existing village and respect landscape and historic features wherever practical and feasible This will be controlled through the preparation of a SPD.
632	38	iv	SSP13			Change to: "New and enhanced local and community facilities must be provided at South Marston compliant with SSP8 B viii) and planned and developed in partnership with the local community".

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632	39	vi	SSP13		The roads at the centre of the village (and other areas such as 'The Bends' at the North of the village) are not suitable for through traffic. This policy is not sound as it permits further volumes.	Change to: "Traffic management measures must be implemented to minimise the volume and impact of traffic to and from the EDA passing through South Marston village where practical and feasible". "To and from" are specified as, for example, the design of the White Hart junction makes the return journey from Sainsbury's to Highworth via the A419 significantly longer than the outward leg.
632	40	vii	SSP13		A comprehensive plan for the village will require reappraisal of existing and potential community facilities which are currently in different ownerships. The need for additional open space at the field to the southwest of the Recreation Ground is believed to be an essential starting point.	Change to: "Formal and informal open space will be provided within or adjacent to the village commensurate with the scale of development provided and include all or part of the field to the southwest of the Recreation Ground".
632	41		SSP13		Current provision for sewage and drainage are already at capacity and need a comprehensive plan to ensure new developments to not adversely impact existing households	Additional point: "Development at South Marston will require significant new infrastructure in terms of sewage, drainage and utilities supply. These should be addressed in a comprehensive plan for the whole village, not just those areas within the EDA."
632	42		DMP4A			The policy should include reference to Exception Sites in rural areas, since these are a locally tailored solution to rural affordable housing which is generally met with community support which may not be forthcoming for open market extensions.

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632	43	4.56	DMP5		Phasing is not sufficiently provided for and tied to funding for infrastructure being available. The Core Strategy is weak on stating that this will be essential within the revised SPD for the EDA or the proposed EDA Infrastructure SPD.	
632	44	D ii	DMP6			Change E ii) to "Preserve and enhance archaeological and physical landscape features where practical. Preserve by record archaeological remains not covered above where the Local Planning Authority considers it neither practical nor desirable to preserve in situ. Appropriate provision for the excavation, recording and, in appropriate cases, conservation of the remains must be ensured before any permission is granted".
632	45		DMP6			Add "In rural areas in particular, physical and historic features may have strong local and cultural significance. This includes ways, boundaries and unlisted local features e.g. field ponds and the agricultural sluice gate remains in South Marston Brook.
632	46		DMP7			This should be amended to ensure clarity that this relates to all community facilities including open, play and recreational space and not just buildings. It should also order that consultation with local communities is required beforehand. 4.69/4.71 The list of community facilities should be extended to include the above.

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632		47	DMP8		DMP8 stresses the role of on-site and strategic green infrastructure. Non-strategic networks of footpaths, bridleways, cycleways and areas of community forest are of equal value. These contribute to local wellbeing, sustainable travel plans and reductions in car use. This will prevent misinterpretation of DMP8 C, which implies a preference for piecemeal green infrastructure, without local linkage.	Additional bullet point on the value of enhancing non-strategic green infrastructure, particularly in and around developments on Greenfield sites, to supplement interpretation of DMP8 A4/5. Development should respect and utilise historic features such as track ways and land boundaries. This will also need to be adequately covered in the proposed Green Infrastructure SPD.
632		48	Implementation		Concerned that the delivery and implementation of infrastructure associated with development is in the hands of the Infrastructure Delivery Board, which does not include any community representation. Communities provide a significant part of the existing infrastructure in terms of community facilities and open space. No decisions should be taken on local infrastructure provision (where it impacts on viability or use of such premises) without adequate involvement from, for instance, Parish and Town Councils.	
632		49	General		South Marston will treble or quadruple in size as a result of development in two areas, one promoted by the EDA and one by the Strategic Settlements Boundaries scheme. There is not common ownership or dialogue between the landowners on how development should proceed.	

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632		50	General		<p>The existing village of South Marston falls outside the EDA for technical reasons that we do not fully understand. It has significant traffic and flooding problems. We believe that an integrated plan for the village is essential. Failure to accept our requirement goes against PPS12</p> <p>Paragraph 6.1 "pay close attention to the contents of non statutory parish and community plans". The absence of an integrated plan creates a planning vacuum where there is danger for an opportunist application for permission to develop. We are aware that Hartwell's PLC are looking to put in an early application for the Crown Timber site and are alarmed that it may be decided on before there is at least a mechanism for an integrated plan.</p>	
632		51	General		We are not content with the level of detail, certainty or policy that would be provided via a Design Brief.	We would look for, at the very least, a separate SPD for South Marston, or alternatively for all the EDA land north of the railway, which ever is more appropriate.
632		52	General		The obligation to provide solutions to problems such as the traffic at Pound Corner must be inserted in the Core Strategy.	
633		1	SO1/CP7		Welcome the strategic objective SO1: Sustainable Development and the aspiration of CP7 to deliver a comprehensive sustainable strategic and local transport network.	

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633		2	CP7		<p>Consider the transport elements of the strategy to be unsound:</p> <p>1) assumptions regarding future funding by developer contributions</p> <p>The economic recession has hit plans for major housing and other developments in Swindon very hard. Contend that, given these circumstances, it is unrealistic and dangerous to assume, even if the economy recovers rapidly, that development will proceed fast and extensively enough in Swindon to provide sufficient developer contributions to finance all the capital-intensive elements on which the transport strategy and hence the core strategy depend. The transport element of the core strategy is therefore highly vulnerable and unsound.</p>	<p>The soundness of the transport element of the core strategy would be improved if more emphasis were placed on less capital-dependent and rapidly implementable measures; and it detailed alternative options that could be taken up if there was a shortfall in funding.</p>

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633		3		CP7	<p>Consider the transport elements of the strategy to be unsound:</p> <p>2) Impact on CO2 emissions and pollution</p> <p>The figures indicate a per capita increase in CO2 emissions from transport which will jeopardise Swindon's ability to meet existing legal requirements for CO2 reductions, is inconsistent with national policy and is contradictory to Strategic Objective 1 of the Core Strategy which seeks to exceed national and international targets for CO2 emissions reductions.</p>	<p>It is hard to identify what changes are required to make the transport strategy sustainable, since the strategy does not provide information on the relative scales of the different interventions and therefore the contribution to modal shift and CO2 emission reductions that it is intended each will make.</p> <p>However consider the following could increase the sustainability and cost-effectiveness of the strategy:</p> <p>Give more attention to 'low-tech' options - these have been shown to be extremely effective in influencing travel behaviour, promoting modal shift and reducing CO2 emissions.</p> <p>Reduce interventions designed to increase road carrying capacity for private motorised vehicles.</p> <p>Include a real 'demand management' toolkit, should include interventions designed to disincentives use of the private motor vehicle, such as road-pricing, workplace parking levies, and filtered permeability. The absence of disincentives is likely to be major reason why the transport strategy fails to deliver significant sustainability benefits.</p>
634		1		Spatial Vision	<p>Support the proposed Spatial Vision and is particularly encouraged by the inclusion of an 'integrated and sustainable transport system'. We also agree with the statement that communities should be safe and healthy.</p>	

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634	2		SO1		The Trust is committed to integrating renewable energy at the existing hospital site and thus, as an organization we will assist in the overriding aspiration to reduce CO2 emissions through the delivery of exemplary development.	
634	3		SO2		The Trust supports the commitment to deliver the infrastructure needs arising from the anticipated growth up to 2026.	
634	4		SO4		The Trust supports the aspiration that housing should have access to facilities and services including healthcare.	
634	5		SO7		The Trust fully endorses this objective to deliver a comprehensive and sustainable transport network which will support Swindon's long term growth.	
634	6		SO7		The Trust would seek further reassurance as to how a sustainable transport network will be delivered in the context of the hospital and what measures are to be implemented to secure this.	
634	7		SO9		The Trust endorses this objective which seeks to meet the need for community and health facilities arising from growth as and when they occur.	
634	8		S09		This statement appears largely aspirational and in order to ensure that future needs are met, the Trust would need some further certainty over the future expansion of the existing hospital site.	
634	9		CP1		The Trust seeks clarification within Pont A) that 'timely investment in infrastructure' includes healthcare provision and specifically acute healthcare.	

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634		10	CP2		The Trust supports the thrust of this policy which seeks to provide essential infrastructure which meets the needs of the Community and for new developments to fund the provision of such facilities	
634		11	CP2		It is imperative that new development funds the necessary improvements in essential infrastructure in order to allow the Trust to meet its core objectives. With regards to the timing of infrastructure delivery, the Trust would expect the necessary infrastructure to be in place prior to the occupation of future development.	
634		12	CP2		Request the inclusion within the list of partners identified in para 2.11. The Trust would like to reiterate its commitment as identified in para 2.13.	
634		13	CP3		With regards to the Biotechnology and Low Carbon industries, the Trust endorses the statement "opportunities to develop and create new ..GWH". Endorse the recognition of the hospital as a key employer.	
634		14	CP6		The Trust would welcome further reference to the contribution that the GWH provides in collaboration with educational institutions and its commitment to education and training.	
634		15	CP7		Supports this policy and welcomes investment into the transport network to improve accessibility.	

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634		16	CP7		The Trust would like to reiterate their comments made to the EDA SPD and specifically to the proposed connecting link from the EDA to Commonhead. We seek further clarification as the likely implication this will have for emergency vehicles, staff and patients accessing the GWH.	
634		17	CP7		The Trust supports the provision of a rapid transit network in Swindon and would like to engage with the Council as to how this will impact on the current transport provision which serves the hospital	
634		18	CP7		The Trust supports the provision of enhanced and improved bus services that would enable patients and visitors to the hospital access by alternative means of transport to the car.	
634		19	CP7		The Trust have looked at the Strategic Transport Strategy (2009) and welcome the provision of a site to the east of the Commonhead roundabout.	
634		20	CP7		We seek confirmation from the Council that the allocation for a P&R site in the LP will be replaced at the Commonhead site.	
634		21	CP9		Point A The Trust supports the identification of sites through the Site Allocation DPD	
634		22	CP9		Point B The Trust endorses the concept of Multi Agency Centres and the funding of any additional healthcare in reaction to an increased number of dwellings to be funded by the developer	

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634	23		CP9		Point C The Trust agrees with this statement, however the Hospital also provided a range of healthcare services which are not defined as either acute or emergency care	The Trust requests that Point C) is reworded to reflect the range of healthcare services that do not constitute either acute or emergency care
634	24		CP9		Point D The Trust supports the provision of locally based services, however the Hospital also provides a substantial level of 'non-emergency' health care services and would seek to continue this centralise service	
634	25		CP9		Point E The Trust endorses this statement and would welcome further investment to ensure an efficient and effective network of emergency services. The Trust would like to reiterate the importance of an efficient network of transport routes across the Borough in order to minimise delays for ambulances.	Paragraph 2.132 The Trust would request the inclusion of ambulance when referring to emergency services.
634	26		CP9		Point G The Trust supports this statement which seeks to protect the loss of existing health and community facilities	
634	27		CP9		Para 2.126 The Trust supports the integration of funding and planning within policy to support the planned growth for Swindon in a sustainable manner.	

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634		28	CP9		Whilst it is noted that there will be an increasing requirement for community based facilities, the Trust would also need to receive developer contributions to provide for the growing demand for health care at GWH. The evidence for this requirement is contained within the HIA undertaken by the Trust.	
634		29	SSP2		THE Trust supports the general content of these proposed policies, However, as a healthcare provider within the Borough we seek reassurance that there would be no impact on the function or capacity of the hospital to meet the needs of residents within Swindon. This includes both constructional and operational phases of future development.	
634		30	SSP3		The Trust supports the general content of these proposed policies, However, as a healthcare provider within the Borough we seek reassurance that there would be no impact on the function or capacity of the hospital to meet the needs of residents within Swindon. This includes both constructional and operational phases of future development.	
634		31	SSP5		With regards to point G) the Trust agrees that the GWH will provide the principal location for ambulance emergence response if this fits with the strategy of the GW Ambulance Service. Welcome the provision of supplementary facilities at the Multi-Agency Centres in order to minimise call-out times	

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634	32	SSP5		Fig 13 Notes the Indicative area of search for a new fire station on land in and around the GWH. The Trust would like to engage the Council in discussions with regards to the appropriate siting of this facility and welcome involvement at the earliest opportunity.	
634	33	SSP7		Trust support the urban extension at this location. However are concerned about the level of growth impact upon the ability to access the hospital site, particularly emergency vehicles.	
634	34	SSP7		Trust strongly requests that the wording of point iv) is amended to reflect the current LP policy DS3. Suggest that the current wording in the Core Strategy is open to challenge.	Suggest that the wording in the Core Strategy should be replaced with the wording in Policy DS3 of the LP: "Include an extension to the Great Western Hospital comprising 5.5 hectares, on land to the west of the hospital, adjacent to the existing hospital site.
634	35	SSP7		In response to point v) the Trust welcomes the provision of sustainable transport links from the existing urban area and Swindon town centre to Commonhead.	
634	36	SSP7		The Trust acknowledges that the LP allocation for a University at Commonhead has been withdrawn following the safeguarding of a site within the CAAP. However, on the basis that the Trust currently provides education at the existing hospital site in conjunction with UWE, the Trust envisage that the demand for health orientated education will rise at this location.	

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634		37	SSP8		As per comments to the EDA SPD made earlier this year by the Trust.	
634		38	General		Please replace " Swindon and Marlborough NHS Trust" with "Great Western Hospital NHS Foundation Trust" throughout the Core Strategy document.	
635		1	General		British Waterways considers that the Core Strategy is legally compliant and sound. We welcome this policy and are pleased that the Council appreciate the wide ranging benefits that canal regeneration can bring.	
635		2	CP10A, SSP4		We are concerned however that the use of the term 'open space' may exclude associated development which may be necessary for the canal to remain functional, such as marinas and boatyards. As the canal, and it's assets, are non-footloose, they have particular land use implications and locational requirements that need to be treated flexibly. Such facilities may not be able to compete with high town centre land values and may need to be located on the edge of towns or in the countryside.	In order to maximise the social and economic benefits of the canal, provisions should be made to encourage a whole range of ancillary development, such as trade moorings (provision for water based businesses such as floating restaurants and traders), residential moorings, slipways and attractive waterside areas, all of which adds vibrancy to the network. Note the new TCPA Policy Advice Note regarding Inland Waterways.

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636		1	General		<p>Core Strategy needs to conform with an adopted RSS, not a draft version subject to legal review. The only adopted document is the structure plan, so the strategy needs to conform with any previous adopted development plan documents, which its does not and should not (sic).</p> <p>Equally, under sec 19, preparation of the Core Strategy is only in conformity with the RSS (draft) which is an inadequate basis for being legally compliant.</p> <p>Inspector should be aware of strength of opposition expressed to the RSS in Swindon. Evidence exists.</p>	
636		2	General		<p>Although Core Strategy refers to Community Strategy for Swindon, no mention is made of Wiltshire's Community Strategy, given the proposed 3,000 house development proposed west of Swindon.</p>	

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636		3	General		<p>Core Strategy does not comply with Statement of Community Involvement, despite Diversity Impact Assessment. Where is evidence of consultation with under represented/disadvantaged/community groups shown in main document.</p> <p>Raised by the Inspector of CAAP, concern exists about compliance by the Council with the SCI, and token consultation as shown by "connecting people, connecting places" approach.</p> <p>Council says its keen to involve communities, but excludes key pressure/community groups.</p> <p>Document highlights role of Action Plans in making change happen with community support, but little evidence exists of this in plan preparation/determination of planning apps.</p>	
636		4	General		<p>Examples exist which demonstrate unsoundness (see reps 5 to 8) of this draft and the need for an extended period of revision (perhaps 1 year), to be founded upon consultation and participation by groups of local residents and other partners in line with the Statement of Community Involvement. Willing local partners include Swindon Civic Trust, Swindon Federation of Community Organisations, New Mechanics Institution Trust.</p>	<p>An extended period of revision of Core Strategy which is an even more critical orientating document in Swindon. Further pre-submission stage required. Implementation, concerted of the range of consultation methods in SCI.</p>

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636	5		SSP7		Commonhead, page 84, figure 15. The development indicated has virtually no connectivity to its adjacent urban area. Separated by a dual carriageway with inadequate crossing provision. It sits in an isolated appendix on the SE corner.	Delete development area.
636	6		SSP4	Yes	Central Swindon Area as defined on proposals map page 73. Boundary of the Central Area runs down the centre of Rodbourne Road/Rodbourne Lane separating the shops forming the local centre. Boundary not drawn based upon reasonable knowledge of evolution and present pattern of use. Evidenced by 1976 maps of transport and neighbourhood growth in stages from 1904.	Re-align the boundary to include all the local centre facilities. Redraw based upon community knowledge, through consultation and available community records and research.
636	7		CP10		Page 63. Green spine ignores obvious (researched and evidenced by published walking guide) cross hillside linkages, green network more appropriate.	Change to include traditional and available routes/green corridors
636	8	4.65	DMP6		Parks and Gardens. Does not include GWR park, the original 1840's town centre park laid out by GWR.	Include this and other missing green spaces of historic and present utility.
637	1		CP6		State this policy is unsound as it is not based a robust evidence base.	
637	2		CP6		Supports the aspirations for a university however risks not attracting a university by not providing a campus university.	
637	3		CP6		Should be noted that, in terms of post 16 education, private training providers also offer mainly work based learning	

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637		4	CP6		Object to the proposal to add sixth forms to four additional schools. Quality will be lower because of limited curriculum choice and it will be costlier. New College will be to absorb the additional growth by a building a new annexe.	Amend policy CP6 to read: iii) Additional capacity will be created at existing post 16 colleges to accommodate growth. Amend paragraph 2.88 to: At present post 16 education is provided at ? (see rep) and a post 16 special school. An additional 400 post 16 places across the Borough is forecast and will be accommodated by expansion of existing colleges in the Borough.
638		1	SSP8		The Core Strategy proposals map shows an urban form which is expressed in further detail in Figure 16 of the Core Strategy, SSP8. Figure 16 was developed in the EDA SPD by SBC. This SPD followed the Swindon EDA Framework Report prepared for SBC by LDA Design. Neither of these documents have been included in the Core Strategy evidence base and therefore there is no justification for the scale of development and urban form proposed in Figure 16.	In order to make the Core Strategy sound, the EDA SPD should be included in the Evidence Base for the Core Strategy so that it can be examined as part of the Core Strategy Examination.
638		1	SSP8		The Core Strategy Proposals Map shows an urban form which is expressed in further detail in Figure 16 of the Core Strategy, SSP8. Figure 16 was developed in the EDA SPD which was published by SBC. The SPD followed the EDA Framework Report prepared for SBC by LDA Design. Neither of these documents have been included in the Core Strategy Evidence Base and therefore there is no justification for the scale of development and urban form proposed in Figure 16.	In order to make the Core Strategy sound, the EDA SPD should be included in the Evidence Base for the Core Strategy so that it can be examined as part of the Core Strategy Examination.

<i>Respondent Ref</i>	<i>Comment No.</i>	<i>Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
638		2	SSP8		<p>ESCG has expressed to the Head of Planning at SBC their concern that the proposals set out in the EDA SPD are unsound and will not be examined for soundness by the Planning Inspectorate. It is ESCG's belief that SBC have deliberately sought to avoid this review of soundness and that the scale of development proposed in the EDA requires the detailed policy and Planning Inspectorate examination of an AAP in order to provide a robust and credible Evidence Base for the EDA proposals.</p>	<p>In order to make the Core Strategy sound para 3.69 sentence two should be changed to "SBC will therefore prepare an AAP for the EDA".</p>
638		3	SSP8		<p>The EDA SPD has been consulted upon and the ESCG, along with nearly 2,000 other individuals and groups, have objected to the scale of development and urban form of the EDA proposal produced by SBC and LDA Design. ESCG believe that the results of these objections should have been considered by SBC and then any changes incorporated into Figure 16 before it was incorporated into the Core Strategy. Instead, the results of the consultation into the EDA SPD will not be incorporated into a further draft of this document until early 2010. This may be too late for the changes to be considered by the Core Strategy examination. This is further evidence of the lack of community participation in the development of the Core Strategy.</p>	<p>To make the Core Strategy sound, Figure 16 (EDA) should be changed to incorporate the submissions made by the local community into the EDA SPD. SBC should allow for greater community involvement in the scale, design, infrastructure and community facilities provided by the EDA. Furthermore, para 3.69, sentence two, should be changed to "Swindon Borough Council will therefore prepare an AAP for the EDA based upon an Enquiry by Design (or equivalent) process in order to allow for the participation of the local communities into the scale and design of the EDA"</p>

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638		4	SSP8		The EDA abuts and surrounds a number of key transport routes, namely the A420, A419 and the London to Bristol railway line. There is no detailed evidence base provided as to how this infrastructure will be strengthened and enhanced in order to facilitate the trip rates generated by the EDA. There is also no indication as to how this infrastructure will be specified in the future. Many of the 2,000 responses to the EDA SPD concerned the lack of transport infrastructure planning within that document and that lack of detail is reflected in Figure 16 of the Core Strategy. The Core Strategy does not provide enough detail as to the transport infrastructure requirements and how this is being provided.	To make the Core Strategy sound, Section B xiv) must contain greater detail as to the transport infrastructure required, the timing for the delivery of this infrastructure, where the funding will be provided from and who will have responsibility for constructing this infrastructure.
638		5	SSP8		Section C para iii) of the Core Strategy seeks to preserve the character and identity of the surrounding villages by non-coalescence. Clearly Figure 21 shows a new area of development directly to the east of South Marston. The proximity and scale of this development, given the lack of any form of physical separation, can only be seen as coalescence. As such, Figure 21 should be amended to provide a greater degree of separation between these two communities.	To make the Core Strategy more sound, the development to the east of South Marston should be either reduced in size or moved to the east to avoid coalescence.

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638	6	SSP8		<p>Given the lack of credible evidence provided in support of the scale and urban form of the EDA, it is not possible to assess whether this design represents an appropriate strategy when matched against reasonable alternatives (such as a significantly smaller scale development). It is ESCG's contention that the EDA is not an appropriate strategy given the impact of the flood plain on the urban form and the lack of consideration given to the service and transport infrastructure requirements of this development.</p> <p>At the very least the scale of development should be significantly reduced in order to provide a more sustainable urban form and a more deliverable infrastructure package that will not compromise the delivery of affordable housing due to viability conditions.</p>	<p>To make the Core Strategy sound, justification for the scale of development and the urban form should be added to the evidence base. In the absence of this evidence the scale of development should be reduced to reflect the impact of the flood plain and the transport infrastructure requirements generated by a 12,000 dwelling allocation in this location.</p>

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638		7	SSP8		SSP8 does not adequately identify the infrastructure requirements of the EDA proposal. Further, the policy outline in SSP8 does not explain how such large levels of development can be provided in an area with extensive floodplain. A fundamental principle of the current thinking on sustainable urban design requires walkable neighbourhoods and a density of development that supports amenity provision, community facilities and sustainable transport provision. This design promotes internalisation of journeys and more importantly, promotes a hierarchy of transport choices with public transport, walking and cycling ahead of car use. The urban form expressed in Figure 16 cannot support this pattern of sustainable transport and as such, the surrounding road infrastructure will be subject to higher trip rates from the EDA.	
638		8	SSP8		LDA Design have used a 'sift method' of urban design. This is where the various constraints present in the land (such as flood plain, ecology, archaeology, transport and typography) dictate the urban form and residential dwellings occupy the residual land once all of the constraints have been mitigated. This produces fragmented pockets of separate, unsustainable communities. This process cannot produce sustainable development and will result in another car based urban sprawl of which Swindon has already seen too much.	

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638		9	SSP8		The Core Strategy has not identified, or has underestimated, the infrastructure requirements of the urban form proposed by Figure 16. Further, it has not sought to understand the infrastructure requirements of delivering service and road infrastructure to separate communities within the EDA through large areas of floodplain. The servicing of the EDA therefore, will be substantially more expensive than other, more suitable locations, which have not been included in the Core Strategy. This additional infrastructure cost will put at risk the delivery of the EDA and compromise important, community centric, elements of the Planning Agreement such as community facilities and affordable housing.	To make the Core Strategy sound, the infrastructure requirements generated by the fragmented urbanism (caused by the flood plain and other land constraints) need to be better understood and reflected in the policy of SSP8. Further, development around the areas of the flood plain should be eliminated to ensure that the EDA, in a reduced form, can be delivered. This will deliver a more sustainable community based upon a transport hierarchy centred around public transport and walkable neighbourhoods.
638		10	SSP8		The Core Strategy does not adequately identify, quantify and cost the very considerable, complicated and expensive infrastructure required to service 12,000 dwellings in this location. Consideration should be given to the transport and flood plain implications and also the additional infrastructure that results from the fragmented urbanism of the EDA proposal. Para 3.61 acknowledges the difficulties but wrongly, suggests that these "challenges" provide "opportunities". This demonstrates a lack of considered policy by SBC and as such, an AAP should be commissioned to ensure that key infrastructure is identified and a delivery strategy is available.	To make the Core Strategy sound, the infrastructure implications should be identified via an AAP and additional policy provided in the Core Strategy to ensure that this identified infrastructure is deliverable.

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638	11		SSP8		The Core Strategy does not adequately reflect the delivery timescales for implementation. There is no consideration of the impact of delivering the service and transport infrastructure for a 12,000 dwelling development in this area or the impact of the flood plain resulting in a fragmented urbanism.	To make the Core Strategy sound, the infrastructure requirements generated by the fragmented urbanism, surrounded by flood plain, need to be reflected in the Core Strategy.
638	12	3.71	SSP8		Para 3.71 states that "there are high cost infrastructure items that the existing policy would not generate enough funds to deliver". Without these funds, the EDA cannot be serviced and is therefore undeliverable.	To make the Core Strategy sound, the infrastructure requirements of the EDA need to be assessed, costed and agreed with the promoters of the site. Any shortfall in funding should be specified and the sources of additional funding identified. Without this funding certainty there is a risk of a detrimental impact on surrounding communities if infrastructure is not provided at the appropriate stage of development or the EDA is not able to be implemented due to a shortage of third party funding (such as Government agencies).
639	1		SSP6		Although the major part of Wichelstowe is within the Parish of Wroughton, the Core Strategy does not acknowledge this. It is implicit that Wroughton is a separate entity and with the ultimate development of Wichelstowe it will be seen as such.	
639	2	3.89	SSP12		It should be made clear that the sentence "it remains important that the gap between Wroughton and Swindon is retained to preserve the separate physical and community identity of Wroughton" should identify Wichelstowe as Swindon. Given this distinction it ought to be made clear that provision for e.g. Sports fields in Wichelstowe are not seen as provision for Wroughton and land should be identified within reasonable proximity to the village.	

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639	3	viii	SSP6		Given the new contractual arrangements necessary in the light of the slowdown of this development and the change in the immediate funding of the Science Museum, this link (Croft Road to Hay Lane) should be reconsidered.	Such consideration should more fully take in the impact on Wroughton village, the rural Hay Lane route, Wharf Road and take in a new traffic design philosophy on Wroughton High Street (Red Traffic Lights).
639	4		CP7, SSP12		In light of the statement in SSP12 "supporting rural transport initiatives that increase accessibility", additions should be made to CP7 to improve linkage between Wroughton and the Great Western Hospital, and Wroughton and West Swindon.	Additions should be made to CP7 to improve linkages, e.g. Cycleway link between Wroughton (Wharf Road)/Wichelstowe/West Swindon and an improved bus service linking Wroughton, Wichelstowe and the Great Western Hospital.
640	1		DMP1		Although 'inclusive design' is occasionally mentioned, there is no reference to any policy describing what constitutes inclusive design or where details are to be found of criteria by which it should be measured.	There should be a clear indication as to what constitutes 'inclusive design', by reference to the Access for All document which needs to be approved and adopted
640	2		DMP1		There is little evidence in the Town Centre or other recent development to suggest any meaningful progress in accessibility despite previous Council consultation	Clear and consistent statements are required to show how an inclusive design policy is to be applied and measured.
640	3		DMP1		'No significant change' to the current strategy can itself have a profound impact. The statements indicating 'no adverse effect' do not take into account current deficiencies which will worsen if not addressed. Should be looking for positive effects rather than a perceived lack of negative ones.	
640	4		DMP1		The Planning Department already has the opportunity and power to promote and request best practice guidance to be followed but rarely chooses to do so.	The investigation and operation throughout the country should be incorporated into the Core Strategy

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640		5	DMP1		The language is inconsistent and not sufficiently positive in regard to the approach to accessibility. The strategy leaves too many issues unclear and open for individuals to require resolution under the DDA.	A positive 'change' policy and plan is required in order to first prevent deterioration of accessibility and then to bring about improvements
641		0	General		Believes that the Core Strategy is sound.	
642		1	SSP13		Consider that the policy should also focus upon establishing the 'identity' of South Marston and thus be reworded.	It isn't effective in defining the 'identity' of South Marston. Suggest the following wording: All development proposals should respect the overriding principle of protecting and enhancing the identity of the village which identity shall be defined by reference to a) its current appearance and issues as evidenced in the Village Strategy 2007 (as amended) b) its historical heritage as revealed by prior extensive archaeological and landscape investigation (so that features which might not be preserved in other area of the EDA - such as field layout, hedgerows, lanes, tracks, ridge and furrow, ploughing headlands, drainage ditches, views and minor, as well as major, sub-surface archaeology - will be preserved in South Marston)
643		0	SSP2			
643		1	SSP12		The policies would not ensure that the social, environmental, economic and resource use objectives of sustainability will be achieved.	
643		2	SSP12		The evidence base is inadequate to justify the policy or support sustainable development objectives.	

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643		3	SSP12		The Core Strategy is not founded on a robust and credible evidence base and has not been subject to adequate transparent public participation of the local Highworth community.	
643		4	SSP12		The rural villages of Swindon are the most sensitive built environments in the Borough for growth. Thus, robust comprehensive assessments and village environmental protection policy is justified by exceptional local circumstance. For example, the fact that housing in the Swindon Urban Area is already highly accessible to villages and hence provides a viable housing alternative to meet the borough's needs.	
643		5	SSP12		Environmental and amenity concerns are identified as a major concern in the Rural Issues Paper (July 2009), however no meaningful inadequate appraisal is undertaken. Thus the policies do not attempt to address these issues, particularly with regards to the high levels of growth endorsed by the policy with inadequate strategic comparative assessment that this growth can be accommodated without significant adverse impacts arising.	
643		6	SSP12		There are no environmental policies proposed that will ensure balanced and sustainable development.	
643		7	SSP2		Dispute that there is no urgent need for development in Highworth of the scale indicated in this policy. There is no up to date housing policy to support this.	

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643		8	SSP2		The policy adheres to the RSS 'policy driven' approach without meaningful critical assessment of whether the high levels of growth directed to the villages is justified and whether it can be accommodated without significant adverse impacts on the environment and village character.	
643		9	SSP2		It is premature to advocate growth in the villages with no evidence that this can be accommodated in a manner that is environmentally acceptable.	
643		10	SSP2		Inadequate attempt is made to address environmental impacts of growth either in the evidence base or in the policy text.	
643		11	SSP2		The policy should advocate a more balanced approach with any growth only being allowed where this can be accommodated within environmental limits	
643		12	SSP12		Highworth is sufficiently unique as a rural settlement that it warrants a separate policy to protect its unique character and identity.	Amend policy SSP12 to retain the local landscape protection policy for Highworth from the LP 2011, Policy ENV12. This policy is still needed to maintain village character, identity and landscape setting and is justified under PPS7.
643		13	SSP12		The 'Vision for Highworth (Our Future Is In Our Hands)' deals with economic visions for Highworth but does not address environmental or landscape issues or attempt to define the development capacity of the settlement. The Rural Issues Paper seeks to identify these concerns, however does not appraise these issues in the evidence base or address them through the policy.	

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643		14	SSP12		Existing evidence supporting the proposed policy is very limited and unbalanced and focused on economic and facility deficit perspectives without an actual assessment of the need for growth in villages. For example, an up to date Housing Needs Assessment for villages	
643		15	SSP12		The evidence base is inadequate as it promotes an inflexible option for growth of targeting major housing growth at Highworth and Wroughton, essentially requiring undetermined levels of greenfield growth in the countryside.	
643		16	SSP12		The SEA has no meaningful assessment on the basis that no comprehensive research or environmental studies have been completed	
643		17	SSP12		The SHLAA is inadequate on the basis that it was fundamentally limited in scope by the methodology assumption that the only option for accommodating housing is by incremental growth of rural villages. The SHLAA did not consider potential alternative sites, for example, on the edge of urban extensions.	
643		18	SSP12		The assessment of suitability of sites in the SHLAA was flawed. It does not provide any comprehensive, strategic appraisal of impacts of the sustainability of development and comments made to the SHLAA have not been addressed publicly.	

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643		19	SSP12		No evidence or clear objectives are given that indicates rural growth will enhance the sustainability of settlements. More market housing will increase the size of dormitory settlement population resident outside Swindon, thus resulting in less sustainable development.	Settlement capacity studies should be undertaken to demonstrate that any levels of growth are deliverable and sustainable and can be accommodate without adverse impacts on Highworth.
643		20	SSP12		Inadequate pro-active 'front-loaded' consultation has been undertaken with residents of rural villages.	
643		21	SSP12		The Core Strategy does not provide the most appropriate strategy and has not been subject to a robust and comprehensive consideration of reasonable alternatives to rural development.	
643		22	SA		It's inadequate due to lack of consideration of alternatives and the failure to undertake adequate research, such as strategic assessment of the environmental impacts of the scale of development.	
643		23	SSP12		Growth policies only provide assurance that more market housing will be constructed and do not provide assurance that beneficial facilities will be delivered.	
643		24	SSP12		Retention of existing LP policies, including Policy ENV12, are not considered even when no updated evidence is provided to justify the change in policy.	Policy ENV12 should be carried forward until the evidence base landscape studies demonstrate it is no longer needed.

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643	25	SSP12		Core Strategy should include policies to address environmental and social impacts of development on rural villages. A criteria based policy which ensures that village-countryside fringe is not released for development until adequate research and appraisal has been undertaken.	
643	27	SSP12		An Area Action Plan for each village would be a good policy development option.	There should be no change to the existing boundaries of rural settlements until the Council has undertaken an Area Action Plan for each village
643	28	SSP2		Policies fail to recognise local circumstances, particularly the close proximity of Swindon's villages to the urban area.	
643	29	SSP2		Growth at villages should be limited to small infill development, previously developed land and affordable housing exception sites only with rural greenfield development directed to the edge of urban extension locations.	Policies SSP2 and SSP12 should be amended to limit housing growth to infill development within existing rural settlement boundaries to accommodate demonstrable need for affordable and key worker housing identified by the Council.
					There should be no change to the existing boundaries of rural settlements until the Council has undertaken an Area Action Plan for each village.
643	30	SSP2		Accommodating any balance of greenfield rural housing and employment on the outer fringes of extensions to the Urban Area would result in less adverse effects on rural settlement character. For example, the EDA or an Ecotown compliant with national policy. This would result in more sustainable housing growth and avoid potential higher adverse impacts on villages resulting from large scale modern greenfield development.	Allocate the balance of rural area housing growth outside of existing rural settlements to locations on the edge of the urban area or urban extensions which relate well to the rural area, for example, Blunsdon, EDA, Tadpole Farm

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643		31	SSP12		The Core Strategy lacks flexibility as it provides only one policy option, requiring the substantial proportion of rural growth at Highworth and Wroughton. This is in spite of having not yet tested whether the policy can be delivered without adverse impacts.	
643		32	SSP12		Leaving the identification of actual settlement growth boundaries to the Site Allocations DPD lacks transparency or soundness as the Core Strategy adopts only a single growth option.	
643		33	SSP12		The adoption of the Core Strategy would prejudice and effectively predetermine the outcomes of the Site Allocations DPD. Thus the supporting evidence base for the rural growth policy should precede the core Strategy.	

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643	34	SSP12		Further policy flexibility is required, as a minimum, to set out a sequential preference for several growth options being based on an identified set of sustainability criteria.	<p>The policy should be amended to make reference to sustainability criteria specific to the growth of rural villages, including impacts which must be assessed appropriately prior to approving planning applications or allocating sites in rural settlements</p> <p>The following text is suggested: While targets in the RSS have been set, and the preferred option is that this will be accommodated in existing settlements, we accept that insufficient studies have been undertaken to ensure that the levels of housing growth commensurate levels of employment development proposed can be accommodated sustainably within individual rural settlements without resulting in significant adverse impacts on the values which make the settlements desirable places to live including village character and amenities, landscape impacts, historic character, agricultural land impacts, ecology, green infrastructure and social cohesion and wellbeing.</p> <p>In the interests of delivering sustainable development, prior to allocating development on sites outside of existing settlement boundaries, before allocating significant new development, the Council will undertake studies into the comparative environmental capacity of individual settlements. No development outside existing settlement boundaries will be permitted until an AAP or SPD has been adopted. If the studies conclude that development targets are unable to be met sustainably at villages in accordance with the settlement hierarchy approach, alternative more sustainable means of accommodating the growth will be adopted by AAP or SPD, including</p>

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						development on the fringes of urban extension sites adjacent to the Swindon urban area or developments meeting the Eco - Town standards set out in PPS1
643		35	SSP12		The Core Strategy is not fully compliant with national policy as it considers benefits to developers but fails to adequately address the social and environmental impacts of rural areas.	
644		1	SSP6		The buildings at East Wichel are very high density and it looks like a prison and part of urban sprawl. Development should be stopped at East Wichel.	
644		2	General		There are no adequate provisions for law and order and the police cannot cope. There needs to be a great deal more funding available for police from Central Government.	
644		3	General		Inadequate provisions for transport	Traffic surveys need to published for public viewing.
645		1	SSP7		52,000 people have signed a petition to ensure that a one kilometre buffer of countryside is protected against development near Coate Water. The Government's White Paper "Communities in Control: Real Power, Real People" calls for local authorities to involve communities in the decision making process hence, this policy conflicts with the Government as so many people oppose this development.	

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645		2	SSP7		This policy is not effective as the area is remote from the urban area, more land needs to be set aside for hospital expansion, it is not consistent with PPS1 due to potential damage to ecology, landscape, archaeological features and views around the area. It is also not justified as plenty of alternatives exist to develop housing and employment and the land is more important to Swindon's future as an area of high landscape value.	Delete wording of SSP7 and replace with: <ul style="list-style-type: none"> · Up to 10 hectares of land at Commonhead will be safe-guarded for future expansion of the Great Western Hospital · Land between the hospital, Coate Water Country Park and the motorway is designated for it high landscape value, its special historic and literary quality and its potential ecological value. No development will be permitted · Land to the west of Day House Lane will be managed as a wildlife conservation area to add value to Coate Water Special Scientific Interest, Coate Water Local Nature Reserve, Day Copse Local Nature Reserve and Burderop Woods North Local Nature Reserve.
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655		3	SSP8		Raised concerns over the matter of pollution control in EDA as there had been a lack of consideration of traffic noise from the A419 and air quality in the EDA.	Allow for more green spaces to dissipate the air pollution.
656		1	SSP9		Tadpole Farm development would increase road noise and congestion. No real traffic survey has been completed.	Less houses should be proposed at Tadpole Farm and the right size garages should be developed. Also a new road should be implemented either towards Purton to A419 so construction traffic does not used Thamesdown Drive.
656		2	SSP9		Tadpole Farm development would decrease children's safety and impact on the environment.	
657		1	SSP9 (ix)		The area already carries too much traffic which the roads are not designed for.	
657		2	SSP9 (ix)		Increased traffic would decrease pedestrian safety.	

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657		3	SSP9 (ix)		The bus stops do not allow space for further traffic as most stops have been erected without a full bus 'pull in station'.	
658		1	SSP9		Inadequate parking provision combined with routing traffic via Redhouse would increase congestion in an already congested area, in particular the filter lanes.	Remove Oakhurst and Redhouse from point ix) Invest properly in the road infrastructure that this development requires rather than looking for the cheapest and quickest 'fix' which will be detrimental to residents in both Oakhurst and Redhouse.
658		2	SSP9		The increase in traffic volumes within the Redhouse area would effect children's safety, in particular around play park areas.	
659		1	SSP9		The proposal for a link road from Tadpole Lane to Addinsell Road is unsound because the roads were constructed for only local traffic and they are already congested. The roads will become gridlocked.	Alternative routes need to be explored taking traffic away from already established residential areas throughout the whole of Redhouse and Oakhurst.
659		2	SSP9		The traffic generated from Tadpole Farm development will have a detrimental effect for local residents in North Swindon through noise, pollution and general road safety.	
660		1	SSP9		Object to Tadpole Farm due to children's safety, congestion, noise pollution and environmental impact.	Suggest Purton Road as an alternative where these concerns do not apply to the same extent.

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661		1	SSP9		The Core Strategy (Preferred Options) para 20.13 states "Tadpole Farm... was selected as a Preferred Option... with relatively limited impact in transport terms and upon the character and identity of surrounding settlements". This statement is contradicted in Core Strategy (Preferred Options) para 20.17 "The Small Scale Urban Extensions Study and initial work on the Swindon Transport Study ... will have a significant impact upon the local transport network cumulatively during peak flows".	
661		2	SSP9		The Tadpole Farm Development would clearly have a substantial impact, in terms of traffic flows, on adjacent areas. In addition, SSP9 states that the average number of cars per household is 1.5, however this would not appear to reflect the average in this area, and could be underestimating traffic considerably. The Swindon Transport Study of the North and West Swindon local transport network already indicates that new road infrastructure is required to cope with the extra homes.	
661		3	SSP9		The Purton Road improvement to link Thamesdown and Purton Road to the Great Western Way is in the Core Strategy but cannot be funded currently. The Priors Vale development of about 6000 houses required a substantial ring road (Thamesdown Drive) to be built to accommodate the traffic. The conglomerate of 5000 houses (The Wiltshire, Mouldon Bridge and Tadpole Farm Developments) must require an appropriate structure.	The conglomerate of 5000 houses (The Wiltshire, Mouldon Bridge and Tadpole Farm Developments) must require an appropriate structure.

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661		4	SSP9		SBC has stated that construction traffic for the Tadpole Farm Development should not be allowed to go through Redhouse or Oakhurst but instead use the old A419 and reach the area from the North. If it is deemed sensible for construction traffic then it is also sensible for the public to use. This link would allow quick and easy access to the A419 and also the M4.	If the old A419 is to be used for construction traffic, then arguably it should be used for public traffic. This link would allow quick and easy access to the A419 and M4.
661		5	SSP9		By combining a link road to the Purton Road running in between West and North Swindon, and a link road from the North of the Tadpole Farm Development going eastwards towards the landfill and onto the old A419, a sustainable transport solution could be achieved without adversely affecting existing communities.	
661		6	SSP9		Eastbury Way is at present already difficult to traverse because of the parking situation. The additional traffic that would travel along the Addinsell Road - Eastbury Way link would add to the difficulties that already exist.	
661		7	SSP9		Both Addinsell Road and Eastbury Way have homes with approximately 200 front doors facing directly onto the road with no buffer, unlike Oakhurst Way which is an AVR standard as covered by the Priory Vale design guide (which does not permit doors to face directly onto the road and has larger open areas and hedges between homes and the road). In addition, residents do not park their cars on this road, unlike Addinsell Road which, due to the parking, is one lane approximately 90% of the time.	

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661		8	SSP9		The large play park and open area at the top of Addinsell Road has a high volume of children playing and walking to the Redhouse schools, as well as dog walkers and cyclists each day from all over Redhouse and Ash Brake. Children are already having to walk onto the road of Eastbury Way to see if any cars are coming due to the high volume of cars parked on the road all day. A link along Addinsell and Eastbury Way would make things worse.	
661		9	SSP9		In relation to the proposed link along Addinsell Road and Eastbury Way, the existing traffic and parking situation hinders the quick and easy access for emergency vehicles. Further increase in traffic volumes would add to the problem. Parking restrictions could improve the situation along the route but would impact even more on the residents living off of the route.	
661		10	SSP9		Increased traffic flow (due to the proposed link along Addinsell Road and Eastbury Way) would jeopardise cyclist and pedestrian safety further. Parking restrictions would have no real effect on pedestrian and cyclist safety.	

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661		11	SSP9		<p>The planned route along Addinsell Road and Eastbury Way would cut through Redhouse and therefore intersect many of the green foot and cycle way through Redhouse. Along Addinsell Road and Eastbury Way there are approaching 200 properties that have front doors that open up onto the route with very little garden between the front door and the road. The increase in traffic would cause a negative impact on the safety of young children with little or no road safety awareness.</p> <p>The junction of the link road between Addinsell Road and Tadpole Lane would need careful consideration as the improvements needed to the two bends on Tadpole Lane near the intended junction may need altering, which could use up land designated as open space for the residents of Redhouse. The link road would pass right in front of land designated as public open space and a children's play area that is under construction.</p>	
661		12	SSP9		<p>Many residents in Redhouse believe the impact of the Tadpole Farm Development would be detrimental to individuals and the community if the link from Tadpole Lane to Addinsell Road onto Eastbury Way and then Thamesdown Drive is allowed. They are concerned about the increase in traffic (and its impact on safety) and the possibility that the road could become a 'Rat Run' for traffic bypassing Thamesdown Drive for access to the A419 and Highworth. The proposed route would change the character of Eastbury Way from a Local Distributor Road to a main thoroughfare.</p>	

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661		13	SSP9		The original master plan and subsequent framework plans do not support the idea of opening the route (along Eastbury Way and Addinsell Road) up further. SBC stated that the very nearby Lady Lane was turned into a pedestrian/cycle route because the Priory Vale development would have changed its character entirely. Clearly, the development of a link route through Addinsell Road would completely change the character of this community and cannot be justified based on the reasoning for Lady Lane not being utilised.	Re-opening of Lady Lane is worth consideration as it already links Tadpole Lane to Thamesdown Drive and has approximately 20 homes backing on to it, and none that open onto the road. It would be of low cost to re-open.
661		14	SSP9			Provide a sustainable travel solution for all modes of transport including links around, not through, Redhouse and Oakhurst (or one link between Redhouse and Oakhurst and another link between Redhouse and St Andrews Ridge/Ash brake).
662		1	SSP9		Unclear why further development is needed in North Swindon as homes are for sale all over the Priory Vale area.	
662		2	SSP9		Tadpole Farm area should be protected due to its beauty.	
662		3	SSP9		No evidence of long-term transport analysis as the two residential streets (Oakhurst Way & Redhouse Way) will be overwhelmed.	A robust road infrastructure is necessary or the building of 2000 homes at Tadpole Lane must be re-thought.
662		4	SSP9		Residents who bought houses in the surrounding area had no knowledge of Tadpole Farm development, so who will recompensate them for the impact on house prices.	

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663	1		SSP9		Object to Eastbury Way being the main route from Tadpole Lane/Lady Lane because of children's safety, congestion and environmental impact.	Suggest Purton Road as an alternative scheme due to the reasons stated.
664	1		SSP9 & SA		Difficult to assess the impact of a development on the neighbouring areas when the structure and content of that development is so vague, therefore the public can not judge the provision of services and the transport plan as they appear in the Core Strategy.	
664	2		SSP9 & SA		Gaps in baseline data and figures for north Swindon must make it difficult to predict the levels of public services required, hence this should be rectified. Also leads to the fact that the Sustainability Study is not of sufficient depth.	
664	3		SSP9 & SA		Does not believe the creation of a fixed twenty year plan is a desirable way to inform policy as details become out of date quickly.	Needs to be break clauses to allow for new legislation otherwise by the time development is completed it is out of date and insufficient to meet the needs of residents.
664	4		SSP9 & SA		Lack of consultation for easy to reach groups, for example there have been only one public meeting about Tadpole in the Redhouse area, no posters, mail drops or information open evenings/afternoons available to the public to help them understand. Overall the council has not made sufficient effort to make sure groups most affected by the Core Strategy are informed.	

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664		5	SSP9		The Core Strategy does not go far enough to protect the residents of Tadpole Lane and other potential development areas from the vagaries of the developers as there are no time limits for developers to provide services. Illustrates the flexibility is all about what is not said rather than what is said.	
664		6	SSP9		The Core Strategy is based on incomplete evidence much of which is not in the public domain namely the traffic data.	
664		7	SSP9		Lack of future provision of education and plans must include room for future changes in provision. This includes research into maternity figures and evidence for future planning of nursery and primary school provision.	
664		8	SSP9		Medical facilities are omitted from SSP9 and there is currently a lack of these.	
664		9	SSP9		Specifics of the potential road layout are not included in the Core Strategy, however if the north/south access is paramount, then this should be tested against planning law prior to the whole development being given the go ahead.	
664		10	SSP9		The deliverability of the plan rests on economic factors in particular developer contributions. However due to the current situation is now the moment to be promising to deliver on a range of aspirations, targets with no punitive arrangements in place to make sure these things are delivered without detriment to the existing and future residents of Swindon.	

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664		11	SSP9		The Core Strategy is not a coherent document as the provision of services are at odds with the transport plan.	
664		12	SSP9		The Small Scale Urban Extensions Study, used as evidence for Tadpole Farm development, assumes Redhouse is complete where as lots of the services have yet to be provided by developers.	States health care facilities, medium sized supermarket, indoor children's facility, nursery provision, improve broadband, links towards A419, provision for community access and a multi faith Place of Worship or community building should be provided in the Redhouse, Oakhurst and Haydon End area before any new development takes place.

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665		1	SSP9		<p>The Swindon Borough Planning Department has stated that Addinsell Road and Eastbury Way have been constructed as 'All Vehicle Routes' which are essentially local distributor roads occurring throughout Haydon to the North and South of Thamesdown Drive.</p> <p>Planning regulations restricted the amount of parking to 1.5 spaces per dwelling in Priory Vale, which has resulted in cars being parked along the road and on pavements. This has resulted in 'All Vehicle Route' roads not meeting the points specifically defined within the framework plans that roads must have: a 2m footpath on one side; 1-3m verge on either side of the road separating a footpath/cycleway from the carriageway; and allowance for 12m single decker buses to pass each other along the route.</p> <p>It has been suggested by SBC that parking restrictions could rectify the situation but this would only push the parking problems onto the side roads, pavements and private property, which would cause further disruption.</p> <p>Opening the Tadpole Lane to Addinsell Road link would contradict several philosophies in the Core Strategy, found at DMP2 A ii); para 4.27; CP2 I); CP7 v); para 2.101; para 2.107; para 2.314; SSP5 A I); SSP5 B and para 3.42.</p>	

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665	2		SSP9		Additional traffic as a result of the proposed link along Addinsell Road and Eastbury Way hinders the quick and easy access for emergency vehicles. There are existing traffic and parking difficulties and a further increase in traffic would add to the problem.	
665	3		SSP9		Additional traffic as a result of the proposed link along Addinsell Road and Eastbury Way would jeopardise cyclist and pedestrian safety further.	
665	4		SSP9		The proposed link along Addinsell Road and Eastbury Way would cut through Redhouse and therefore intersect many of the green foot and cycle ways.	
665	5		SSP9		Along Addinsell Road and Eastbury Way there are approaching 200 properties that have front doors that open out onto the route with very little garden between the front door and the road. The increase in traffic would cause a negative impact on the safety of young children with little or no road safety awareness.	
665	6		SSP9		The junction of the link road between Addinsell Road and Tadpole Lane would need careful consideration as the improvements needed to the two bends on Tadpole Lane near the intended junction may need altering, which could use up land designated as open space for the residents of Redhouse.	
665	7		SSP9		The proposed link road would pass right in front of land designated as public open space and a children's play area that is under construction.	

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665		8	SSP9		Many residents in Redhouse believe the impact of the Tadpole Farm Development would be detrimental to individuals and the community if the link from Tadpole Lane to Addinsell Road onto Eastbury Way and then Thamesdown Drive is allowed. They are concerned about the increase in traffic (and its impact on safety) and the possibility that the road could become a 'Rat Run' for traffic bypassing Thamesdown Drive for access to the A419 and Highworth. The proposed route would change the character of Eastbury Way from a Local Distributor Road to a main thoroughfare.	
665		9	SSP9		The original master plan and subsequent framework plans do not support the idea of opening the route (along Eastbury Way and Addinsell Road) up further. SBC stated that the very nearby Lady Lane was turned into a pedestrian/cycle route because the Priory Vale development would have changed its character entirely. Therefore the reopening of a link similar to Lady Lane would change the character of Addinsell Road and Eastbury Way.	
665		10	SSP9		It seems logical and sensible to provide sustainable transport links to the developments of Tadpole Farm, Ridgeway Farm and Moredon Bridge onto Purton Road, preferable after the Purton Road to Great Western Way Link mentioned in CP7 has been completed, or at the very least in readiness for its completion.	Amendment to SSP9 ix) Provide a sustainable travel solution for all modes of transport including a link to Purton Road in cooperation with other developments between North and West Swindon.

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665		11	SSP9		SBC has stated that construction traffic for the Tadpole Farm Development should not be allowed to go through Redhouse or Oakhurst but instead use the old A419 and reach the area from the North. If it is deemed sensible for construction traffic then it is also sensible for the public to use. This link would allow quick and easy access to the A419 and also the M4.	
665		12	SSP9			Amendment to SSP9 ix) Provide a sustainable travel solution for all modes of transport including a link to North of the Tadpole Farm Development going eastwards towards the landfill site and the old A419 and a link to Purton Road in cooperation with other developments between North and West Swindon in preparation for the Purton Road Great Western Way Link.
665		13	SSP9		Along Oakhurst Way the houses are set quite far back behind hedges and railings and it would therefore have a significantly smaller impact on the residents along the way which are also far fewer in number. Also Lady Lane could be reopened to provide two links for the Tadpole Farm Development.	
665		14	SSP9			Provide only one link for the Tadpole Farm Development to Thamesdown Drive.

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665		15	SSP9			Provide a link from through Oakhurst Way and a second along Salzgitter Drive. The link along Salzgitter Drive would unfortunately start to affect several houses in St Andrews Ridge and Blunsdon so isn't a good alternative. Therefore I would not recommend this but I would suggest that it would affect residents less than the proposed Addinsell Road/Eastbury Way link.
666		1	SSP9		Due consideration to the transport infrastructure needed as congestion and associated problems already exist in Priory Vale. Turnpike Junction is poor, which does not help.	Review Tadpole Farm access points by either improving transport infrastructure or add new roads via Cricklade Road or directly onto A419. Provide multi access points as well as improving existing.
667		1	SSP9		Lack of consideration over road network to and from Tadpole Farm development as the Priory Vale area is already congested.	Need to create more access points other than Tadpole Lane, for example to/from A419, westwards onto Thamesdown Drive and even Cricklade Road.
668		1	SSP9		State Tadpole Farm will create road noise, congestion, issues over children's safety, impact on environment and no real traffic survey has been completed.	Keep housing to 1500 and not 2000.
669		1	SSP9		Congestion, children's safety (due to traffic) and parking problems already exist in north Swindon, with the increase from 1500-2000 houses at tadpole, these problems will become unbearable.	Keep the proposal of 1500 houses and create a new exit road taking traffic away from current development over to the Blunsdon Road

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670		1	General		The Core Strategy is not Legally Compliant as it fails to generally conform to the dRSS. The Core Strategy proposes a Housing Trajectory which does not conform with a robust evidence base. Core spatial policies do not transparently target the provision of housing at a rate which is in accordance with the dRSS, including the initial accelerated rate of house building (1780 houses per year in Swindon Borough 2006-16) since it is based on optimistic assessments of the deliverability of a number of sites that underpin both the RSS and the Core Strategy.	
670		2	General		Aspects of the quoted Evidence Base studies and Strategic Environmental Assessment upon which the strategy is founded fail to satisfy the need for a robust and credible evidence base	
670		3	SSP2		The Core Strategy housing delivery trajectories accompanying SSP2 are based on an outdated and factually inaccurate evidence, which fails to acknowledge or respond to changes in circumstance, specifically the shortfall in 5 year housing supply and the unrealistic delivery assumptions of a number of the key sites (particularly the EDA).	

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670		4	General		Aspects of the evidence base has shortcomings in research and a failure to reflect the outcomes of public participation, including the Swindon SHLAA and Swindon Small Scale Urban Extension Study. Evidence Base failures result in SSP2 being fundamentally unsound, with consequential impacts on other spatial policies SSP1, SSP6-9 and SSP11. Furthermore aspects of the Core Strategy policies and allocations do not represent the most appropriate alternative in the circumstances.	
670		5	General		Aspects of the strategy are not deliverable, in particular optimistic forecasts of housing delivery from various sites with unfeasible lead-in times for housing delivery predicted at major urban extensions.	
670		6	General		Aspects of the core strategy fail to be sufficiently flexible to respond to the current failure to meet 0-5 year and 6-10 year housing supply requirements from PPS3, or the expectation of continued unpredictable circumstances. The lack of flexibility could have significant adverse impacts on overall deliverability of development targets if not corrected before the strategy is adopted.	
670		7	General		Aspects of SSP11 lack deliverability, in particular the lack of urgency and transparency for delivery of Reserve Sites. Aspects of the strategy fail to be sufficiently flexible to enable it to deal with current housing land supply shortfalls.	

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670		8	General		Aspects of the core strategy are not consistent with national policy. Key inconsistencies are a policy failure of the proposed site allocations in SSP2 to demonstrate adequate delivery of housing, in contravention of PPS3 and a lack of conformity with the targets set out in the dRSS. Failure to meet minimum housing supply requirements would comply with PPS1 as an essential component of sustainable development will not be delivered.	
670		9	SSP2		An overriding objective of PPS3 is that there shall be a 'continuous delivery of housing' to meet development plan requirements (PPS3 para 53). To be deliverable, sites have to be available, suitable and achievable (PPS3 para 54). The proposed Core Strategy would fail to comply with PPS3 guidance as the LPA can not robustly demonstrate a minimum 5 year supply of deliverable sites or the supply of specific developable sites for years 6-10.	
670		10	SSP2		SSP2, the accompanying text and the Housing Trajectory (Figure 10) are considered unsound as the house building forecasts are over optimistic and are not based on a robust evidence base. This inaccurate evidence base influences the distribution of the housing allocations at SSP2 and therefore compounds the problem through the allocations provided under SSP4, 6, 7, 8, 9, 10 and 11. The policies are considered fundamentally unsound and will result in under-delivery of housing, failing to comply with PPS1 and 3.	

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670	11	SSP2		The housing allocations proposed in SSP2 are based on an arbitrary and unrealistic forecast that all identified allocations will be delivered within the 2006-26 plan period. Some large scale allocations are already delayed by several years in comparison with the delivery trajectories first published by the Council in the Core Strategy Preferred Options document.	
670	12	SSP2		<p>Although the latest available AMR (2007-2008) and Swindon SHLAA (April 2009) conclude that Swindon Borough has sufficient available land to meet their 5 year and 6-15 year land supply obligations, the contributing land supply evidence base is considered unsound. The Kingsdown Village Partnership believes that the evidence base is flawed as it is:</p> <ol style="list-style-type: none"> 1) Partly unsubstantiated (e.g. no evidence base to support the deliverable land supply proposed from key sites such as the EDA and no recognition that Kingsdown Village can deliver housing within 5 years); 2) Outdated with consequential factual inaccuracies including a lack of critical analysis of deliverable 5 year housing supply; and 3) Does not reflect current conditions of the development industry, in particular taking an optimistic view of the viability of development on many sites. 	

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670		13	SSP2		<p>The failure to provide sufficient land supply at Swindon noted above was reflected in the conclusions of the Inspector in the recent decision on the Swindon Gateway/Commonhead Appeal (Reference APP/U3935/A/08/2085605 and APP/U3935/A/08/2090316, dated 05 August 2009), endorsed by the secretary of the State, who found that 'deliverable land supply is likely to fall considerably short of a 5-year supply'.</p> <p>At the Swindon Gateway Appeal the issue of a 5 year housing land supply at Swindon was extensively investigated. The Council's position was that there is a 5.8 year supply in April 2008 with the appellant arguing that only 2.8 years supply existed when assessed against the WSSP, or only 2.4 years supply assessed against the dRSS, resulting in a shortfall of up to 4500 (2.6 years average RSS supply). The Kingsdown Village Partnership concur with the analysis of the 5 years land supply assessment considered at the Gateway Inquiry that Swindon Borough has less than 3 years housing supply when assessed against the provision in the dRSS.</p>	

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670	14	SSP2		The Swindon SHLAA is neither up to date, credible or robust as an evidence base on which the Core Strategy can be justified. The SHLAA does not accurately assess the deliverability of sites or the viability of development housing potential of sites. Consultation comments on the SHLAA do not appear to have been given adequate consideration, including the lack of recognition that land at Kingsdown Village is available for development and eminently capable of delivering considerable housing supply within 5 years. To date SBC have not responded to comments made on the Draft SHLAA.	
670	15	SSP2		The Trajectory at Figure 11 is overly optimistic in its assessment of the lead-in and delivery profile of a number of sites, including the EDA. We therefore have a number of concerns at the robustness of these conclusions and the soundness of the document which results.	Figure 11 requires major corrections with consequential changes to SSP2, 3, 8, 9 and 11.
670	16	SSP2		SBC attribute unrealistic reliance on major urban extensions for their housing supply figures, in spite of existing delays and the likelihood of further delay. Examples of issues are: 1) the Southern Development Area/Wichelstowe (4500 houses) is subjects to a delayed delivery profile, a recent Judicial Review and is reliant on phased delivery of major infrastructure. 2) Commonhead/Swindon Gateway development (1800 houses) was recently refused permission on Appeal, and Council are now seeking a reduced yield of 750 houses. 3) the preferred Small Scale Extension at Tadpole Lane (2000 houses) has not progressed as quickly as the Council had forecast.	

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670		17	SSP2, SSP8		<p>The Policy provision for 12,000 houses to be constructed at the EDA before 2026 is considered over-optimistic and fundamentally flawed, rendering the housing trajectory further unsound. SSP2 and SSP8 forecast the completion of the development prior to 2026, based on an unjustified reliance on sustained unfeasible delivery of about 1000 houses per year for a period of at least 7000 years. Previous recent developments in Swindon indicates a realistic sustained average housing delivery rate of circa 600 houses for the Western and Northern Development Areas. The prospect of effective policy is further undermined by a number of unresolved viability issues, including fragmented land ownership, Flood Risk Management and an unresolved need for major infrastructure delivery.</p>	<p>Changes to the policy are needed to reflect a realistic development yield at the site within the current plan period and allocate other sites to meet both short term housing shortages and the balance of the lost completions at the EDA over the longer plan period to 2026.</p>
670		18	SSP2		<p>Delays at urban extension sites are considered highly likely to be compounded by under-delivery or significant delays to delivery within the urban area, particularly an apparent lack of viability in the Town Centre apartment market, which SBC intend to deliver the majority share of the 3500 houses in the Central Area. The trajectories overestimate the substantial housing delivery required on land within the urban area, as yields are based on favourable housing market conditions for sale of apartments, which is already showing signs of significant decline (Regents Place and Swindon College have already been delayed).</p>	

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670	19	SSP2		<p>It is considered that there is a demonstrable lack of a 5 year housing supply in Swindon, and the likelihood of persistent housing delivery shortfalls going forward in years 6-10 unless there is an extremely robust economic recovery in defiance of economic forecasts. There are no exceptional locally specific conditions in the Swindon housing market that would justify any unnecessary shortfall in 5 year housing delivery. To the contrary, as an identified PUA (WSSP2016) and SSCT (dRSS) key housing and employment growth area, Swindon is relied upon by the RSS to lead strategic housing delivery within its sub-regional housing market area. Alternative policy options exist, in the identification of development at Kingsdown, to ensure the market flexibility needed to meaningfully respond to market conditions and deliver an accelerated front-loaded housing supply in the period from 2006 to 2016 (1780 houses per annum).</p>	
670	20	SSP11		<p>Kingsdown Village is an immediately available, highly suitable, deliverable site that can make a meaningful contribution to overcoming the 0-5 year and 6-10 year housing delivery shortfall. Furthermore there are no ownership issues of major infrastructure delays within Kingsdown. The site was recognised as a favoured small scale urban extension site in the Core Strategy Preferred Options consultation document and is the named 'Reserve Site' in the submitted version of the Core Strategy. The site represents the best alternative policy option available for additional residential development to make a meaningful attempt to address housing delivery shortfalls.</p>	<p>Although the identification of Kingsdown as a preferred Reserve Site is laudable and necessary to allow a necessary degree of flexibility in the Core Strategy, it is noted that the existing housing delivery shortfalls are a matter of fact rather than a matter of future uncertainty, and hence a far more positive response is required, by allocation of Kingsdown for earlier development than presently proposed by the Core Strategy. The Core Strategy should therefore promote Kingsdown as a predominantly residential urban extension for development as soon as possible. This would assist in ensuring that the Core Strategy becomes sound and legally compliant.</p>

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670		21	SSP11		Development at Kingsdown would be consistent with PPS3 as it will achieve high quality housing; achieve a good mix of land uses and housing which integrates positively with the urban area and will support and nurture healthy, inclusive communities; be a highly suitable site for housing, including very good environmental sustainability; use land effectively and efficiently; reflects the need and demand for housing in Swindon; and does not undermine wider policy objectives. While it is stressed that Kingsdown Village is a viable urban extension site in its own right, it is noted that Kingsdown is a location which has the potential flexibility to accommodate larger development yields, and address larger shortfalls in housing delivery (land north of Kingsdown Lane). This additional land is also available (under option to a single developer), suitable and deliverable.	
670		22	SSP2		Any provisions which attempt to delay development at Kingsdown, by phasing or other means, are unsound. In light of the existing failure to robustly demonstrate a deliverable 5 year housing supply, it is necessary for Kingsdown to be promoted and delivered as soon as possible. This would be suitable recognition of its status as an eminently suitable residential site, that is immediately available and capable of being delivered (subject to Planning Permission) with very short lead-in delays. The dRSS Panel recognised that if Swindon was to deliver the required level of completions it would need to develop both brownfield and greenfield sites at the same time.	

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670		23	SSP2		Kingsdown Village is a sustainable urban extension in its own right, and also has potential to integrate positively with any larger urban extension at Kingsdown, potentially occupying adjacent land located north of Kingsdown Lane. The Kingsdown Village Partnership have links to the prospective developers of this land and can confirm consultation feedback that the development Kingsdown Village within 0-5 years would enhance and in no way compromise the development potential of any larger sustainable urban extension that could be proposed.	
670		24	SSP2		References to the need for Kingsdown as a purely long term development option are demonstrably unsound and lacks the flexibility required to achieve consistency with national planning guidance, in particular PPS3. The fact is that there is a major existing and constantly escalating shortfall in housing in 0-5 and 6-10 year periods forecast, and hence housing delivery from Kingsdown is necessary as soon as possible.	
670		25	SSP11			Kingsdown should be identified on Figure 10 as an area to which a specific Policy applies.
670		26	SSP2		Whilst agreeing with the outcome of the Swindon Small Scale Urban Extension Study that the Kingsdown site (land south of Kingsdown Lane) is a sustainable location for at least 500 houses and employment land, it is considered that there are a small number of shortcomings with the credibility of the Small Scale Urban Extension Study with respect to the appraisal of the suitability of land at Kingsdown to support a larger development.	These shortcomings should be corrected to restore the credibility of the evidence base.

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670		27	SSP2		Conclusions of the Swindon Small Scale Urban Extension Study appear to be based upon an incorrect assumption that a 1000 house dwelling yield at Kingsdown would exceed the capacity of land south of Kingsdown Lane, biasing the results. This was possibly due to the need at the time the study was undertaken to accommodate a larger employment land component at Kingsdown. Subsequent dwelling yield tests has revealed that the land south of Kingsdown Lane can comfortably accommodate 1000 houses. The Landscape Character Assessment for the Swindon PUA Study was based on 1000 dwellings being accommodated within the Kingsdown Dipslope area and concluded that impacts were potentially 'low' Agricultural Land Quality impacts scoring should also be improved.	These evidence base inaccuracies should be acknowledged.
670		28	SSP2		A number of aspects of the appraisal of the larger Kingsdown site option north of Kingsdown Lane (site 19) from paras 3.74-78 of the SSUES are opposed as unsound with respect to the suitability of the site to accommodate 1000-2000 houses.	Assessment of Landscape Impact, Accessibility and Coalescence are all overstated and should be improved to at least score 'B'. Agricultural Land Quality impact should be 'A' and Biodiversity scores should also be improved to score 'A' as extended phase 1 ecological surveys have identified minimal significant ecological interests to exist on the site and these could be adequately managed.

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670		29	SSP11		<p>SSP11 text recognises the potential for a larger development at Kingsdown, with suitable land located north of Kingsdown Lane. Kingsdown Village development proposals also retain the potential to integrate with any future larger urban extension at Kingsdown. The development of Kingsdown Village within 0-5 years would enhance and in no way compromise the development potential of any future larger sustainable urban extension that could be proposed. The Kingsdown Village Partnership would be supportive of a larger urban extension comprising land north of Kingsdown Lane which is available, suitable and deliverable.</p> <p>Should an urban extension allocation be reinstated for Kingsdown Village, provision would still be needed for Kingsdown in SSP11 with reference to the available, suitable and deliverable site located north of Kingsdown Lane, currently under option to Persimmon Homes Wessex.</p>	
670		30	SSP11		<p>References in SSP11 to the need for Reserve Sites/Kingsdown as a long term development option are unsound and lacks the flexibility required to achieve consistency with national planning guidance, in particular PPS3. Any provisions which attempt to delay development at Kingsdown, by phasing or deferral of Reserve Site delivery are unsound.</p>	<p>In light of the existing failure to demonstrate a robust deliverable 5 year housing supply, it is necessary for Kingsdown to be promoted and delivered as soon as possible. This would be suitable recognition of its status as a highly suitable residential site, that is available and capable of being delivered (subject to Planning Permission) with very short lead-in delays.</p>

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670		31	SSP11		Unsubstantiated statements in text that development at Kingsdown has viability problems due to infrastructure requirements impeding project viability is factually incorrect and should be removed to ensure robustness of the evidence base.	
670		32	SSP11		<p>The mix of proposed mix land uses sought at Kingsdown has recently changed to predominantly residential. The reasons for this are:</p> <p>(1) Recognition of recent evidence in the Swindon Workplace Study (06-09), which reduced predictions of employment land need in Swindon to 2026;</p> <p>(2) Recognition of recent evidence indicating an urgent need to bring forward deliverable residential development; and</p> <p>(3) Recognition of the excellent access to employment land in nearby employment estates comprising approximately 500ha within 2km of the site.</p> <p>Although the Preferred Options allocation for Kingsdown made provision for 500 dwellings, this was as part of a mixed use scheme with approximately 20ha of employment land. The objective of the Kingsdown Village Partnership is now to promote a mixed use urban extension consisting of at least 850-1000 houses. We are also aware that there is potential for some additional housing south of Kingsdown Lane.</p> <p>Infrastructure planning for the development now confirms that a pedestrian/cycle link across the A419 can be accommodated without the need to relocate HVOTL, and hence this infrastructure is deliverable.</p>	Statements that Kingsdown has viability concerns are hence factually incorrect. The Kingsdown Village site and proposals are viable, suitable and deliverable.

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670	33		SSP11		The appeal for planning application at Commonhead/Swindon Gateway has since been refused and hence there may no longer be any need for the contingency reference to this development providing Reserve Site housing.	The redundant clauses in the supporting text should be removed from the Core Strategy.
670	34	3.82	SSP11		<p>Para 3.82 recognises the potential for a larger development at Kingsdown, with suitable land located north of Kingsdown Lane. We note that Kingsdown Village comprises a viable and sustainable urban extension in its own right which integrated positively with the existing urban area of Swindon. Kingsdown Village development proposals also retain the potential to integrate with any future larger urban extension at Kingsdown.</p> <p>Persimmon Homes Wessex, the prospective owners of the land north of Kingsdown Lane, are members of the Kingsdown Village Partnership. The development of Kingsdown Village within 0-5 years would enhance and in no way compromise the development potential of any future larger sustainable urban extension that could be proposed. The Kingsdown Village Partnership would be supportive of the potential for a larger future urban extension comprising land north of Kingsdown Lane which is available, suitable and deliverable.</p>	

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670		35	SSP11		<p>A statement in policy text that Tadpole Lane is more 'sustainable' is incorrect. Kingsdown represents a highly sustainable urban extension option which is immediately available and will contribute an essential urban extension option which is immediately available and will contribute an essential element to the sustainable development of Swindon by delivering crucial housing development with the urgency needed to address an immediate and growing shortfall.</p> <p>Comments regarding Tadpole Farm being a more sustainable site overstate the traffic capacity of the site, underestimate the desirability of Kingsdown as an urban extension site and do not take into account of the ability of Kingsdown to deliver housing to make a meaningful contribution to 5 year housing supply, contributing an essential component of sustainable development. Traffic capacity is largely unsubstantiated and not transparent. It is not possible, for instance, to determine if this reflects cumulative impacts and an unfeasible level of reliance on alternative transport options for the distance of Tadpole Lane from major employment sites which contrasts with the Travel to Work patterns observed at similar sites in Swindon.</p>	

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670	36	D	SSP11		Policy text at SSP11 (D) provides an indicatio of the condition criteria that might apply to a development at Kingsdown. Compliance with these conditions would not be problematic to the Partnership in the development of Kingsdown Village, provided any requirements are to a degree commensurate with applicable regulations and the scale and impact of the development.	
670	37		SSP11		Policy text contains some factually inaccurate or incomplete statements regarding evidence base history in Kingsdown. The text erroneously states that Kingsdown was a Core Strategy Preferred Options allocation for housing. In fact, in addition to a 500 house residential development, Kingsdown was a preferred option for employment land on the balance of the site (unspecified use class) in order to replace employment possibly lost at a Local Plan allocated site at Groundwell West/Abbey Stadium. The S.106 Agreement has not been signed and planning permission has not been approved.	
670	38		SSP11		SSP11 text refers imprecisely to the ability of sites in Wiltshire to be considered as Reserve Sites. We are unsure of the meaning of this paragraph and its compliance with the RSS, and hence this may need to be corrected to ensure legal compliance. As it stands the lack of clarity renders the explanatory text unclear and, as a consequence, unsound.	
670	39		SSP11	Yes		In accordance with guidance at Chapter 8.1 of PPS12, Kingsdown should be identified on Proposals Maps as an area to which a specific policy applies.

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670	40	SSP11			The Kingsdown Village Partnership request that changes be made to SSP11 to improve certainty, transparency and deliverability provisions for development of their land at Kingsdown Village as a further predominantly residential Urban Extension. It is considered that some consequential changes are needed to ensure that the Policy is deliverable, by providing the degree of certainty needed for landowners and developers at Kingsdown to fund site investigations, development planning, planning applications and infrastructure delivery needed to ensure a timely delivery of a Reserve Site to be available to meet the stated aim of sustainable development.
670	41	SSP2			Changes shown in CAPITALS Within Swindon Borough the Regional Spatial Strategy requirement of 34,200 dwellings between 2006 and 2026 will be provided AT A RATE OF 1780 DWELLINGS PER YEAR FROM 2006-2016 AND AT A RATE OF 1710 DWELLINGS PER YEAR FROM 2016-2026 as following: Location: KINGSDOWN VILLAGE Dwellings: 1,200
670	42	SSP2			Changes would be required to Figure 11 'Swindon Borough Housing Trajectory' to reflect justified evidence on housing delivery, with consequential changes to SSP2. Depending on the demonstrable housing shortfalls this may identify the need for further changes to SSP2 including additional text to refer to the need to bring forward a larger development at Kingsdown for an additional 1500 houses.

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670		43	SSP2			Changes would be required to the Key Diagram (Figure 10), to show Kingsdown as a Proposed Development Area.
670		44		Yes		Changes would be required to the Proposals Map to identify Kingsdown as a location for an urban extension.

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670		45	General			<p>Insertion of an additional Core Strategy Spatial Policy would be required to provide for development at Kingsdown Village by adding the following text:</p> <p>SSP14 Kingsdown Village</p> <p>Provision will be made for a mixed use community comprising 1200 homes at Kingsdown Village.</p> <p>Proposals for development at Kingsdown must include:</p> <ul style="list-style-type: none"> (i) Contributions to the provision of community facilities and a local retail centre; (ii) Pedestrian and cycle link(s) across the A419; (iii) Highway Improvements and transport contributions required to mitigate impacts on the highway network; (iv) Contributions to secondary education provision; (v) Provision of and/or contributions to primary education; (vi) Affordable housing in accordance with Core Strategy Spatial Policy; (vii) Mitigation of impacts on the character and identity of Broad Blunsdon; (viii) Noise attenuation to mitigate the impact of the A419; (ix) An element of mixed use employment land; (x) Confirmation that development would not compromise larger development potential at Kingsdown.

<i>Respondent Ref</i>	<i>Comment No.</i>	<i>Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
670	46	A	SSP11		If an urban extension allocation for Kingsdown is not provided as requested and/or in order to retain provision for a larger development at Kingsdown, it is considered that changes are made to ensure the soundness of SSP11.	Changes shown in CAPITALS: Policies SSP2 and SSP3 set out the spatial distribution of employment land and housing to meet the needs of the Borough. In order to provide a DELIVERABLE security of supply BOTH OVER 5 YEARS and over the long-term as a result of changing circumstances, then an additional sites or sites may be needed to be brought forward.
670	47		SSP11		If an urban extension allocation for Kingsdown is not provided as requested and/or in order to retain provision for a larger development at Kingsdown, it is considered that changes are made to ensure the soundness of SSP11.	Insert 'E. The Preferred Option for a Reserve Site is land at Kingsdown. Further additional sites may also be necessary.
670	48	3.80	SSP11			Change to: The Small Scale Urban Extension Study provides the evidence base for the identification of reserve sites, however this should be reviewed in the context of the specific circumstances.

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670		49	3.81	SSP11		<p>(Changes in CAPITALS) Change to:</p> <p>The Preferred Options identified land at Kingsdown as a smaller scale urban extension for 500 dwellings AND FOR EMPLOYMENT LAND WHICH WAS INTENDED TO COMPENSATE FOR THE LOSS OF LAND AT AN URBAN AREA SITE AT ABBEY MEADS/ ABBEY STADIUM. KINGSDOWN IS NOW THE PREFERRED RESERVE SITE OPTION. Kingsdown is now the Preferred Reserve Site option. However in the Small Scale Urban Extensions Study Kingsdown was assessed as being less sustainable than Tadpole Farm. The Preferred Options identified Tadpole Farm for 1,500 dwellings, limited on the basis of initial transport assessment. Subsequent transport modelling has concluded that 2,000 dwellings could be accommodated at Tadpole Farm. The Preferred Options proposal at Kingsdown was therefore included to achieve the RSS requirement on the basis of the lower figure at Tadpole Farm.</p>

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670	50	3.82	SSP11			(Additional text shown in CAPITALS) Change to: It is recognised that longer-term development opportunities could exist at the Kingsdown area, which may be appropriate IF SHORTFALLS IN HOUSING LAND SUPPLY IDENTIFY SUFFICIENT NEED (delete 'beyond 2026 or regarded necessary on revision of RSS'). Also it is clear that to integrate Kingsdown into the existing urban area would require significant infrastructure requirements (delete 'which are beyond the viability of a development of 500 dwellings'). This has particular implications for access to local services and primary schools, and ultimately for the final scale of any development in this area. ALTHOUGH INSUFFICIENT NEED FOR B8 IS CURRENTLY IDENTIFIED, the primary employment opportunity identified for Kingsdown is for B8 development due in no small part to its proximity to the strategic road network, although it is important consideration needs to be given to the compatibility of this use alongside the delivery of residential and other uses, ensuring quality throughout.
670	51		SSP11	Yes		Kingsdown should be identified on Proposals Maps with a corresponding change to the Key Diagram Figure 10, as a Reserve Site to which SSP11 refers.
672	1	A	CP3		Agreed. Need to continue focus on all sectors to maintain a diverse economic base.	

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672	2	B	CP3		Swindon's success is due to its ability to offer a cross section of development sites and buildings to a wide range of businesses. Swindon's ability to effectively supply the needs of industry will be hampered by the Core Strategy's overemphasis on office development within the Swindon Central Area. Companies should be free to choose the location which best suits their business.	
672	3	C	CP3		Many of the key employment areas referred to in the Core Strategy are 40 years old and require substantial redevelopment.	The Committee feel that these areas should have their own individual Council led draft Masterplanning guidelines and should be for mixed use development so enabling those long standing companies in these existing locations to sell their properties for a higher value use and be able to move to new sites and construct new factories to suit their needs. This will be proactive economic regeneration.
672	4	D	CP3		Agreed	
672	5	E	CP3		55ha is insufficient to provide an adequate supply, range and choice of sites suitable for the forecast growth in employment. When calculating total allocation one should be careful to make sure that there are a wide range of sizes available. The current trend to 'pepper pot' employment sites around village centres such as proposed in East Wichel will only be suitable for small, possibly local based companies, and that major sites need to be allocated to suit major national and international companies which Swindon has so successfully attracted in the past.	
672	6	2.23	CP3		The Committee members agree that it is important to maintain a flexible and responsive supply of employment land.	

<i>Respondent Ref</i>	<i>Comment No.</i>	<i>Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
672	7	2.23	CP3		At the present time if a company seeking to move to Swindon wanted to acquire a site of 1 acre to build a new facility they would have little to choose from.	The Council should specifically identify an area of land, say 30 acres, within the Borough that could be provided with infrastructure and utilities such that it can be divided into smaller plots of land, i.e. half an area upwards, and be sold to individual companies who could construct their own premises. This was successfully achieved at Westmead in the early 1980s by E H Bradley and attracted a wide cross section of companies including the likes of Renault and Brakes Bros. The Wichelstowe area close to M4 J16 could provide such a solution once the motorway underpass and road infrastructure to serve the employment area is constructed in 2011/12.
672	8	2.23	CP3		The Committee have grave concerns about the Council strategy to "pepper pot" employment uses throughout major housing developments as part of the sustainable agenda as it will stifle the range and variety of employment land that the town can offer. The proximity to housing, schools etc will limit these employment areas to B1A use only as these areas will be difficult to access for large commercial lorries for industrial and warehousing areas.	
672	9	2.23	CP3		The Committee feel that if the Council are to deliver the anticipated job numbers between now and 2017 they will have to attract major companies to Swindon which will need large scale sites.	

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672	10	2.23	CP3		In order to maintain a flexible and responsive supply of employment land, the Council need to acknowledge both in town and out of town sites need to be promoted and that it would be the occupier. inward investors that select the locations which are most suitable for their occupational needs. Out of town offices have dominated the take up figures due to the lack of town centre development opportunities. Union Square will now provide high quality accommodation and will meet the needs of those companies, particularly with a high requirement for clerical staff, that will benefit from being in the town centre. However, those knowledge based companies and high tech companies who need flexible space with possible an element of light manufacturing and storage will still seek out of town locations and should not be impeded.	The Committee feel the Council should identify a range of sites with B1, B2 and B8 uses.
672	11	2.24	CP3		The Core Strategy identifies the need for Swindon to generate and additional 1500 new jobs per annum on average over the next 17 years to meet the target set by the RSS. This is the equivalent of finding a company the size of Honda every two years. To meet this target Swindon will need to place a greater emphasis on the promotion of Swindon both to national and international business and to gear its marketing promotion to the same level of activity that was seen in the 1980s.	
672	12	2.25	CP3		Swindon has an enviable reputation for high tech and advanced engineering companies, therefore it is how Swindon goes about securing a larger proportion of UK and international investment that is the key issue.	

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672	13	2.25	CP3		Locating a University in Swindon is an essential part of turning Swindon into a future location of choice for companies seeking skilled employees.	
672	14	2.25	CP3		Research and scientific companies have widely differing occupational and locational requirements and again the Committee emphasise the need for Swindon to maintain a wide cross section of sites, both in and out of town, rather than try and concentrate these types of companies into the town centre.	
672	15	2.25	CP3			The key employment economic strategy should be to provide attractive business park sites, preferably close to the motorway junctions, as well as town centre opportunities.
672	16	2.26	CP3		Retention of existing employers requires sites for both growth and contraction to be available and a flexible attitude to some of the existing employment areas to allow for change of use.	
672	17	2.27	CP3		The Committee would have liked this review of SBC's employment land to have compared with other locations in the South East, such as Milton Keynes and Basingstoke which are towns traditionally competed against for inward investment opportunities. In addition, Swindon has historically been compared with Northampton and Peterborough and the review should have compared these two towns with Swindon to assess their performance.	
672	18	2.28	CP3		Why and where do opportunities exist to cluster specialist manufacturing at Highworth?	

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672	19	2.28	CP3		Bullet Point 2: Muse are the chosen developer for the town centre commercial core known as Union Square and are beginning to promote this activity.	
672	20	2.28	CP3		The Committee has concerns that Swindon's traditional strengths of being an excellent location for distribution could be undermined by the Council's wish to limit this sector in favour of high density jobs.	The Committee feel that Swindon's growth should follow market demand rather than being directed by ideals.
672	21	2.28	CP3			Consideration should be given to encourage the conversion of more portal framed barns in rural locations and planners attitudes be relaxed such as to allow schemes in less sustainable locations e.g. not on a bus route, to be allowed.
672	22	2.28	CP3			Green technology including energy should be linked with all new developments and where possible existing businesses. The Council should put this as a very high priority so it meets its targets and those businesses which are forward thinking are not hindered by the planning system.
672	23	2.28	CP3		Leisure has become an important economic element which Swindon currently lacks in. With the right theatre, restaurants, perhaps a snow dome, people will visit the town rather than avoid it in the evenings. An investor seeking to construct new leisure facilities should be encouraged even if it is not on Swindon owned land or is on land outside of the Swindon Central Area.	

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672	24	2.28	CP3		Identifying sectors of potential choice is fine but Swindon must also react to market forces and seek to accommodate those companies who want to be here whether or not their sector has been identified already. We must not have a prescriptive selection process either by use or by sector.	
672	25	2.29	CP3		The Council should produce guidance notes for the redevelopment of these older estates and suggestions to encourage developers and occupiers to release sites, possibly for mixed-use development. Ring fencing these old estates and protecting them for purely employment purposes could actually hamper flexibility and reduce the ability of companies to move within the town to brand new premises by selling their existing facilities for higher valued mixed-use schemes.	
672	26	2.30	CP3		This policy states that the Central Area Action Plan for 2009 indicates that there will be 85,000m ² of new office space within the Central Area, i.e. approximately 1,000,000ft ² . Union Square will provide about 600,000ft ² , where is the other 400,000ft ² going to be?	
672	27	2.30	CP3			The following wording needs to be removed from the policy "It is vital that out-of-town office development does not compete with or delay regeneration of the town centre, and therefore a strict sequential approach will be taken in the short to medium term".

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672	28	2.30	CP3		Those companies that have no wish to be in the town centre generally wish to be close to major arterial roads, such as the M4 or A419. A flexible strategy should identify this and not require these companies to go through a sequential test, which by its nature means that they have to consider every site between the periphery of the town and the centre before choosing a site they wish to go to. This aspect needs to be challenged and debated.	
672	29	2.30	CP3		A sequential test for any out of town office development especially on sites which will be 'allocated' doesn't give the impression of being welcoming and could be seen by the occupier as a major hurdle and a total lack of understanding of their needs by the Council. Flexibility to accommodate and deliver available sites for all requirements remains key.	
672	30	2.33	CP3		This table seems to indicate that Swindon require an additional 58-87ha of B-use land in the office sector to meet the forecast growth targets. If the town centre Union Square development is only 7ha, then by its implication the majority of this additional B-use land will be outside the town centre. This seems to be contrary of the intention to try and concentrate on office development in the town centre.	
672	31	2.34	CP3		Supply is one thing, delivery is another. Not a great deal of the land with planning permission is yet deliverable.	

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672	32	2.35	CP3		The Committee identify that Swindon will need a further 3 "Triangle" sites for warehouse users and the Triangle site alone will not be sufficient to meet the needs of the logistics industry over the next 17 years.	
672	33	2.36	CP3		This massive proposal of office space within the Swindon Central Area will in turn require additional car parking and servicing as well as the need for improved access but the Core Strategy does not seem to address this or offer solutions.	
672	34	2.37	CP3		Only well located vacancy property should be considered for the future. Others should be able to be redeveloped for other uses.	
672	35	2.38	CP3		This is all too prescriptive.	
672	36	2.39	CP3		In order to meet the employment targets set by the Council in the Core Strategy, the promotion of the town will have to be significantly "geared up" and to be at a similar level of activity that was last seen in the town in the 1980s. The Council will need to set aside considerable funds in order to promote the town in a much more proactive way than has been the case in recent years. The Inward Investment Committee are keen to assist in this process and wish to have open dialogue with the Council to assist it in accelerating the promotion of the town.	
672	37		CP3		Economic development must be a core foundation for Swindon's growth, yet its priority appears low comprising only 5 pages of a 139 page document.	

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672	38		CP3		The Committee recommended that there should be regular and detailed liaison between forward planners within the Council and the Inward Investment Committee.	
673	1		SSP11		Any delays which would undermine the delivery of dwellings on any site should be analysed.	Need to analyse Policy SSP2 and SSP3 every 5 years, and if there is proof that the housing or employment land will not deliver the numbers at anytime alternative urban extensions to Swindon should be brought forward without delay.
673	2	2.56	CP4		It is proven that pepper potted affordable housing throughout a site with blocks of no more than 15 homes does not work.	The reference to pepper potting should be deleted.
673	3	2.94	CP7		There is no reference to the A420, it is essential that the A420 is upgraded to a dual carriageway and reinstated as part of the trunk road network.	Add the A420 to the list of Strategic Road Network Improvements.
673	4	Fig 7	CP10		Figure 7 is not of a sufficient scale to identify where exactly the strategic green corridors are located. The corridors identified in Oxfordshire and Wiltshire should be removed from Figure 7. As it is not Swindon Borough Council's responsibility to allocate green corridors in other areas.	The corridors identified in Oxfordshire and Wiltshire should be removed from Figure 7.
673	5		CP10		There has been no consultation by Swindon Borough Council with landowners regarding these networks. It is essential that consultation takes place and the need proven.	Figure 7 is an indicative diagram only to show strategic green corridors such that strategic opportunities can be realized should they come forward.
673	6		CP10		Any green infrastructure policy should allow for agricultural and equestrian buildings to be built in order to maintain improvements in farming, horticulture and equestrian economy.	Diversification out of agriculture, horticulture and equestrian uses should be actively encouraged within these areas, including renewable energy production.

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673	7		CP10		It is believed that there is no legal requirement that a green infrastructure policy is included within the Core Strategy.	If this proved the whole of this policy should be removed.
673	8		DMP1		Point 9 (Green Infrastructure) refers to policy DMP9 when it should refer to DMP8.	Policy should be amended
673	9		DMP8		Point A4 of the policy should be deleted. Paragraph 4.75 should be deleted. Paragraph 4.79 should be deleted.	It is essential that landowners and farmers are consulted on the effects of these Green Infrastructure Principles and Policies. There has been no consultation with these landowners and as such this policy needs to be looked at in detail before implementation.
674	1		SSP2		The housing trajectory will fail to meet draft RSS housing figures. Housing allocations are arbitrary and unrealistic. Swindon does not have a five year housing land supply and the SHLAA evidence upon which Swindon's supply is calculated does not adequately consider deliverability. The housing trajectory is overly optimistic with regard to Commonhead, Tadpole Farm and the EDA in terms of the pace that development will be brought forward and the peak yield from the EDA.	
674	2	3.81 and 3.82	SSP11		The reserve site at land south of Kingsdown Lane should be brought forward now to meet the shortfall created by the unrealistic housing trajectory. A reserve site of 500 dwellings will not be sufficient to meet shortfall and a further reserve site, land north of Kingsdown Lane should also be released. Land south of Kingsdown Lane can function independently and would not prejudice land north of Kingsdown Lane coming forward.	Kingsdown Reserve site should be specifically identified for development. Land north of Kingsdown Lane should be identified as a reserve site for development of up to 1,500 dwellings. If land at Kingsdown continues not be recognised, the reserve site should identify land at Kingsdown for 2,500 dwellings.

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675		1	CP7		Failed to address the need to provide adequate roads for additional housing at Tadpole Lane.	Paragraph 2.108 should be amended to read: The purpose of this is to mitigate the impacts of development upon the existing road network at north and west Swindon alongside the localised transport infrastructure. Impact on existing communities will need to be considered during the construction phase. Add: an additional feeder road to the A419 will need to be built to service the development at Tadpole Lane otherwise the already congested Tadpole Lane and Oakhurst Way will become traffic bottle necks especially at peak periods.
676		1	SSP9		I am not qualified to comment on the legal compliance of the Core Strategy therefore I trust that the Tadpole Farm development does comply with the relevant laws and regulations.	

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676		2	SSP9		Vital data justifying the proposal is not readily available including traffic flows, safety of walkers and road users, environmental quality and infrastructure. Therefore there is insufficient data to allow confidence in stated aims in the Core Strategy, in particular relating to transport matters.	<p>Acceptance of the soundness of the plan will require comprehensive surveys, and publication, on the following:</p> <ol style="list-style-type: none"> 1. Traffic flows through Redhouse Way, Eastbury Way and Oakhurst 2. Impact on the safety of pedestrians from the increased traffic flows 3. Impact on the safety of cyclists from increased traffic flows 4. Impact on the proposed development on the efficient and effectiveness of public transport 5. Impact on access through and within Redhouse & Oakhurst for emergency vehicles 6. Environmental assessments of the impact on air quality and carbon dioxide concentration 7. Impact on roadways and paths from extra traffic 8. Impact of the extra commercial vehicles likely to use the access routes to/from the area of the development designated for employment use 9. Impact of the increase in the number of young adults living in Redhouse & Oakhurst who will take to use their own cars as they reach the age at which they can drive. <p>Also states limiting the number of houses planned for Tadpole Farm and re-routing or diverting traffic will be required to ensure the soundness of the Core Strategy.</p>

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677		1	SO1, DMP1		SO1 sets an aspiration of "having exceeded national and international targets for CO2 emissions reduction" by 2026. The Core Strategy is required to be consistent with national and regional policy and should not imply that exceeding such targets will be a requirement.	In circumstances where its attainment would render unviable or unfeasible a development proposal that is otherwise acceptable, such a standard should not be sought. Otherwise that proposal would not proceed, to the detriment of wider planning objectives, including the delivery of housing trajectory. Incorporation of this important caveat would ensure consistency between SO1 and DMP1.
677		2	SO4		SO4 should refer to the creation of balanced communities, which is an important policy objective in PPS3 and the emerging RSS.	The inclusion of a significant element of intermediate housing as part of the overall provision of affordable housing will assist in the achievement of this objective.
677		3	CP4, DMP4A		CP4 includes an annual target of 35% for affordable housing. The Swindon Housing Market Assessment Summary Report (Nov 2006) recommends that "SBC maintain it's existing policy of seeking a 30% target". The Draft Revised RSS proposes a 35% target, but para 6.15 of the document incorporates some flexibility for LDDs to incorporate varied rates for affordable housing at the local level, taking into account "assessments of economic viability, scale of need and impact on overall levels of housing delivery". Para 2.50 of the Core Strategy is incorrect in stating that it must reflect the RSS target, as it does not need to include the same figure. By minimising constraints on housing delivery, this approach may overall be expected to deliver a higher number of affordable housing units	CP4 Para D should be amended to refer to an "annual target of 30%". The phrase "and the Core Strategy must reflect this" should be omitted from paragraph 2.50.

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677	4		SSP2		We support the provision of 19,000 units across the plan period within the Swindon Urban Area and 12,000 dwellings located at the EDA.	
677	5		DMP1		DMP1 Section 1 refers to Context and Character and proposes that development should be "sympathetic to the local context, character and site coverage".	This paragraph should refer to development being appropriate to the location rather than sympathetic to it, as set out in PPS1 para 34.
677	6	A (I)	DMP2		Paragraph A uses the term "where necessary" which is repeated in bullet point (I). This term is unclear in its meaning and is not consistent with the tests set out in Circular 05/2005.	Bullet point (I) should refer to the availability of other funding sources and other funding streams.
677	7	A (iii)	DMP2		<p>Bullet point (iii) proposes to require that development provides for "ongoing maintenance" of facilities provided as a result of the development. This is unclear in respect of which facilities should be maintained, particularly whether it refers to those funded by the development or any facilities provided by another organisation or agency. It is also unclear as to the period of time maintenance should be provided.</p> <p>Bullet point (iii) also applies to the maintenance of all facilities. Irrespective of whether this intends to refer to those facilities funded by the development or any other agency or organisation, the ongoing maintenance is one factor that will be negotiated as part of a S.106 or other mechanism to consider the costs associated with delivery of the development. This will be informed by the proposed Infrastructure SPD and other relevant information.</p>	

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679		0	SSP11		The respondents own land which is part of the Kingsdown area, one of the Reserve Sites. They were supportive of the proposals at the Preferred Options stage, and were prepared to consider bringing their land forward for early development.	
680		1	SSP2		The deliverability of allocations is considered unrealistic with a lack of baseline evidence to demonstrate the intended deliverability. It fails to acknowledge the deficit in deliverable housing land supply hence the housing trajectory is overly optimistic and the is not in conformity with PPS1 and PPS3.	Kingsdown should become an allocation in the Core Strategy in order to address the deliverable housing land supply deficit. The site is available, suitable and deliverable in 5 years. Hence revisions should be made to SSP2, SSP11, Proposals Map and Key Diagram 10.
680		2	SSP2		The Core Strategy is overly reliant on major urban extensions coming forward and fails to provide realistic timescales. Therefore the Core Strategy is not appropriately flexible.	
681		1	CP4		Given the anticipated impact of an ageing population it is disappointing that Policy CP4 only states that range of housing to meet demographic needs will be provided. National policy indicates that development plans should be more 'up front' in addressing older persons housing needs.	A policy specifically identifying and supporting the housing needs of older people.
681		2	CP4		It is naive to think that insisting on Lifetime Homes on its own will adequately address the future housing needs of older persons within the Borough. National policy advocates housing choice including the role that sheltered housing can play in meeting older persons housing needs and providing housing choice. This view was advocated by the Inspector to the Poole Borough Core Strategy.	

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681		3	CP4		It is considered that the policy as worded is ineffective and contrary to PPS3 and the National Strategy for Housing in an Ageing Society as it does not adequately seek to address the housing needs of older people and ensure that they have sufficient housing choice in their retirement years.	A policy specifically identifying and supporting the housing needs of older people, which will include the Council's intention to specifically allocate housing sites for specialised accommodation for older people so as to ensure the policy is effective in delivering the right types of housing and in so doing ensuring consistency with national policy and housing strategy for older persons accommodation.
682		0	General		We have no comment to make.	
683		1	CP8		Paragraph 2.114 In the sentence referring to securing developer contributions, Museum storage for archaeological archives should be specifically mentioned along with public art.	This brief summary of the Borough's historic environment could be expanded to include mention of the Roman small town (SM) and Groundwell Ridge Roman Site.
683		2	SSP9		There needs to be a policy on the need to protect and mitigate against the impact of development on archaeology.	There needs to be a policy on the need to protect and mitigate against the impact of development on archaeology.
683		3	DMP6		HLC is unlikely to lead to the discovery of new sites.	Suggested that the HLC is removed but replaced with: "or identified through new discoveries made during archaeological investigations"
683		4	DMP6			I suggest a new paragraph is added to refer to the new draft PPS on the historic environment which has recently been circulated for consultation by CLG and DCMS. The paragraph could explain that if approved will replace PPG15 and 16 and that SBC will adapt its approach to the historic environment in line with the principles set out in the PPS when it is finalised.

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683	5		Implementation and Monitoring Plan		I think it would be valuable to include monitoring indicators for the historic environment. The most appropriate one is likely to be the number of sites/buildings on the Heritage Assets at Risk Register (English Heritage publication).	I think it would be valuable to include monitoring indicators for the historic environment. The most appropriate one is likely to be the number of sites/buildings on the Heritage Assets at Risk Register (English Heritage publication).
683	6		CP8	Map	Significant unscheduled archaeological features mapping may need to be amended in a couple of places due to recent discoveries e.g. Commonhead and EDA.	Significant unscheduled archaeological features mapping may need to be amended in a couple of places due to recent discoveries e.g. Commonhead and EDA. I shall take a look and send some revised maps as soon as possible.
684	1	2.75	CP5		It is important to be clear that, although the Swindon Designer Centre is an out of centre location in retail planning policy terms, there is a distinction to be made between the type of shopping trip it attracts compared to out of centre retail warehouses. The Designer Centre format attracts tourists, visitors and shoppers from a wide area, stretching beyond the Borough boundaries, resulting in spin-off benefits for the local and regional economies. The Centre's specialist retail role is a key contribution to providing retail diversity within the Borough and wider region.	There should be made special recognition of the contribution that the Swindon Designer Centre makes to the local and regional economies.

<i>Respondent Ref</i>	<i>Comment No.</i>	<i>Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
684		2	CP5, CP8		Our clients consider that all forms of economic activity will need to play a role in the regeneration of the Swindon Central Area and that all forms of economic development, including retail development throughout the whole Swindon Central Area, should be positively planned for. The existing and future role of all facilities within the Swindon Central Area, as major providers of retail and leisure facilities serving the needs of existing and future residents, should be strengthened.	
684		3	CP3		It is a Council objective that the growth of Swindon does not compromise the regeneration and investment in Swindon Town Centre. This is noted and supported.	
684		4	SO6		Specific consideration should be given to centres such as Swindon Designer Centre which operate differently to traditional centres and plan positively for them. Our clients support the principle of identifying a strategy for growth in the main centres and ordering them within a defined retail hierarchy. It is noted however that the Swindon Designer Centre is afforded no position in the hierarchy, despite its important position in the local and regional economies.	It is noted however that the Swindon Designer Centre is afforded no position in the hierarchy, despite its important position in the local and regional economies. Specific consideration should be given to centres such as Swindon Designer Centre.

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684	5	SO6		It is suggested that a separate identification for planning policy purposes for the specialist shopping centre may be appropriate, on the grounds that unlike traditional centres, it serves an extended catchment area and is a particular asset to the region. There does not appear to be evidence that including the Designer Centre and acknowledging its important role in the retail hierarchy has been considered. Our clients are therefore concerned that reasonable alternatives for the hierarchy have not been thoroughly tested and therefore question the soundness of SO6.	Swindon Designer Centre should be afforded special policy status in the retail hierarchy and may need to be treated differently in planning policy terms to other more traditional centres.
684	6	SO8			Visitor and resident's take-up of leisure activities such as destination retail should be added to the list of monitoring indicators, to maximise the flexibility of achieving a strong cultural and leisure base for Swindon. This will be an important addition to the evidence base to ensure soundness moving forwards.
684	7	CP3		PPS4 recognises that the retail sector is an important element of economic development, particularly in difficult market conditions. Our clients are encouraged that tourism and leisure uses are considered to be key elements of the spatial policy for the Borough, however they are concerned that retail uses are missing from CP3 and are therefore excluded from the Council's key spatial policy.	

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684	8		CP3		Because the current economic climate is uncertain, provision should be made for when the economy recovers and the spatial policy must enable Swindon to adapt and grow in economic terms. Having flexible planning policies and strategies will be key to achieving this.	
684	9		CP3		Our clients are concerned about the soundness of CP3 because it does not fully reflect the full range of national planning policy guidance available at the time of the Core Strategy Proposed Submission's preparation and are therefore concerned that the flexibility of the list of relevant sectors is compromised.	
684	10	2.101	CP5		The implementation of our Clients' extant planning permission for the Long Shop will be an important contribution to achieving the aims in para 2.101.	
684	11		CP5		The adoption of bespoke planning policies for the Swindon Designer Centre would represent an appropriate and reasonable alternative for the Borough's planning framework. There does not appear to be evidence that including the Centre and acknowledging its important role in the Swindon retail hierarchy has been considered. Reasonable alternatives have not been tested and therefore our Clients question the soundness of CP5.	
684	12		CP8		The purpose of CP8 is to seek to improve the quality of life of residents and visitors to Swindon. Key elements v, vii and viii can all be achieved or contributed to by the Swindon Designer Centre, which is both an important leisure and recreation facility and a key tourist attraction.	

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684	13	2.112	CP8		Providing opportunities for participation in leisure and recreation activities is a key part of making Swindon a destination of choice. Such activities are integral to economic growth as a driver for regeneration, attracting inward investment and supporting recruitment and expenditure retention.	
684	14		SSP4		Due to the specialist nature and unique role in the region, Swindon Designer Centre should be afforded different policy treatment. Whilst it is recognised that out of centre retail facilities should not be allowed to grow at the expense of the Borough's town and district centres, the policy framework should be sufficiently flexible to make provision for any future expansion and improvement of the Designer Centre.	
684	15		SSP4		Whilst the retail core will be the focus of the retail-led development, retail development in principle is not precluded from the other character areas of the Central Swindon Area, subject to other planning policy requirements being met. This flexibility is welcomed. It is considered that the development of all town centre uses as defined by national policy in the Central Swindon Area would be a positive contribution towards its vitality and viability.	
684	16		CP5		It is noted that a Swindon Retail Capacity Update was published in 2009 and the Swindon Central Area Action Plan was adopted in 2009. It is considered that the retail evidence base for the preparation of the Core Strategy is sound.	

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684		17	CP5		Our Clients would welcome a commitment to adopting the principle of conducting further work to forecast future growth in the Borough and wider region and associated retail and leisure demand. This would enable development strategies to be prepared in-step with predicted forecasts and for appropriate development opportunities to be maximised, to support the regeneration of the whole Central Swindon Area.	
684		18	SO8, CP3		The Core Strategy is a long-term strategy and must incorporate a degree of flexibility. This is increasingly important given current market uncertainties. A policy framework should be in place for the Council to make practical, commercially sensitive decisions about development that facilitate its delivery without disadvantaging established or new communities. This demands a balance of interests across private and public sectors.	The flexibility of SO8 and CP3 could be improved.
685		1	SSP2		<p>Core Strategy contrary to PPS3 and the RSS.</p> <p>It does not identify, as a minimum, a continuous 5 year supply. The Councils trajectory in Appendix 5 and Figure 11 does not meet the RSS housing requirement for the first 10 years.</p> <p>The key reasons for the deficit in continuous supply are the over reliance on consistent delivery at Wichelstowe, Tadpole and the EDA.</p>	

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685		2	SSP11		The policy does not recognise that there is a very real housing land supply deficit now, not only in the long term.	Amend policy SSP11 as follows: "Policies SSP2 and SSP3 set out in the spatial distribution of employment land and housing to meet the needs of the Borough. On order to provide a deliverable security of supply both over 5 years and the longer term as a result of changing circumstances, then an additional site or sites may be needed to be brought forward."
685		3	SSP11		Paragraph 3.80-3.83 These paragraphs lack flexibility. The policy refers only to one potential reserve site (Kingsdown) for 500+ dwellings. This is prejudicial to other sites that may be equally sustainable and deliverable in the short term, such as Abbey Farm. The deficit is substantially more than 500 dwellings. This strategy is ineffective.	These paragraphs are limiting and inflexible, contradicting Policy SSP11. Preface paragraph 3.81 as follows: "Various sites have been assessed in the SSUES as having potential for (housing) development but do not form part of the spatial strategy. These include Kingsdown, Abbey Farm, Land at Hook Street. The Preferred Options identified..."
685		4	SSP2		In respect of the rejection of Abbey Farm as an urban extension option in the SSUES. The evidence base is fundamentally flawed and incorrect. The reasons (strategic landscape impact and high agricultural land quality) did not have merit.	
685		5	SSP11	3.80 - 3.83	The potential of Abbey Farm to provide up to 500 dwellings has not been taken into account within the assessments of deliverability over 0-5, 5-10 or 10+ years. because Abbey Farm was omitted from the SHLAA. It is not a fair and full assessment of the Borough's land availability.	These paragraphs are limiting and inflexible, contradicting Policy SSP11. Preface paragraph 3.81 as follows: "Various sites have been assessed in the SSUES as having potential for (housing) development but do not form part of the spatial strategy. These include Kingsdown, Abbey Farm, Land at Hook Street. The Preferred Options identified..."

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686		1	SSP4, CP8		Swindon Town FC has a history of active involvement in the community by encouraging participation in sporting activity and by playing a major part in the community, leisure and business life of the town. STFC believe that this role can be significantly enhanced in the future by a comprehensive approach to modernising/redeveloping the County Ground stadium area to provide better facilities for both the club and the wider community.	Clear explicit support for such will be important in order to provide certainty and would accord with the spirit of SSP4 which makes the town centre the first preference for higher order civic cultural, education, LEISURE ... facilities (our emphasis).
686		2	SSP5		SSP5 B identifies Inner Swindon as one area of opportunity and need for renewal and regeneration and associates this with redevelopment of the Swindon Central Area. STFC fully supports the regeneration aims and provisions of the Core Strategy, and point out that there is considerable evidence of major regeneration benefits for the respective area from previous English football stadia developments. In this context STFC note that tourism and leisure are identified as one of the sectors on which economic growth will be focussed (CP3), and the site is transport sustainable and would be on or near the proposed Rapid Transport route (CP7).	

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686	3	2.119-2.120	CP8		In view of these elements of the Core Strategy vision and objectives and the activity of STFC in the community and the location and potential of the County Ground in assisting this, it is surprising there is no specific reference at all to the County Ground or to STFC in the Core Strategy.	<p>At most, general mention of the potential role of the town football club with enhanced facilities in the leisure, sport and recreation section (para 2.119-2.20), akin to the future role of the Wyvern Theatre in para 2.116 would be appropriate.</p> <p>Add a new paragraph following 2.120 as follows:</p> <p>"Swindon Town Football Club plays an important role in the consciousness of the town and its well established community activities have great sporting and wider benefits across the Borough and in its local area. At present the County Ground does not offer facilities either matching the aspirations of the club and rising expectations of home and visiting supporters or maximising community and private use for leisure and other purposes. The Core Strategy supports redevelopment of the site to meet these aims in principle.</p>

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686		4	SSP5		The County Ground is the largest site closely related to the town centre and the physical, social and financial contribution of redevelopment at the County Ground to these during the Plan period should be acknowledged. STFC considers its scale and potential attributes mean the site is highly significant to Swindon, and the adjacent town centre/central area in particular, and should be given specific consideration in the Core Strategy. Its importance is undoubtedly enhanced because many projects in the Central Area will now not proceed (Modus site) or are reduced (College site) and/or delayed (Union Square) as a result of the economic downturn. STFC therefore maintains omission of any reference to the status of the County Ground renders the Core Strategy unsound.	Add policy establishing the principle of development of the facilities at the County Ground.

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SSP5

Given that the aspiration to improve facilities at STFC has been a longstanding and significant issue for Swindon and SSP1 has a presumption in favour of development in the Swindon Urban Area as defined on the Proposals Map, national guidance and related PINS advice indicate the Core Strategy should incorporate policy guidance to address any redevelopment of (or relocation of) the football club within Borough Policy. The PINS report states that it is acceptable to refer to a range of possibilities if it is not possible to be more precise but we consider that the absence of a specific policy may hamper the regenerative potential of such a scheme. The project would be of such a scale and importance to the town that it merits specific reference in the Core Strategy, particularly in order to be effective in extending the regeneration of the town centre eastwards and assist in the delivery of regeneration and improvement of Swindon. Omission of such a reference to the County Ground area would therefore be inconsistent with the evidence base and other policies within the Core Strategy.

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686		6	SSP2		<p>Redevelopment proposals for the STFC facilities at the County Ground are likely to include some housing for both viability and need reasons. Such housing would contribute to housing land supply in the Borough, Swindon as a growth area and to 6,700 dwellings in the Urban Area as identified in SSP2. There is no evidence in the Core Strategy or the Swindon SHLAA that the 6,700 dwellings is to be fully accommodated within the defined urban area boundary. We note the Swindon SHLAA considered the County Ground site but this assumed relocation and redevelopment of the stadium, and is therefore flawed as evidence base.</p>	

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686		7	3.14	SSP2	<p>STFC considers the housing delivery expressed in policy SSP2 and Figure 11 trajectory at para 3.14 to be totally unsound because there will be a significant 5 year and overall shortfall. The Inquiry Inspector for the 2009 appeal into major mixed use development at Commonhead concluded that, even with a contribution from the Commonhead site, deliverable land supply in Swindon is 'likely to fall considerably short of a 5 year supply' because of slippage in delivery of major permitted developments (NDA and Wichelstowe) and over optimistic delivery profiles for sites proposed in the Core Strategy (EDA and Tadpole Farm).</p> <p>The submitted Core Strategy trajectory continues with such ambitious and consistent delivery at Wichelstowe, Tadpole Farm and, particularly, the EDA - the cornerstones of the Core Strategy housing allocations - despite the fact that these cannot be reconciled with the PPS3 requirement to have a continuous deliverable supply of housing. Nor is there evidence in the Core Strategy or Swindon SHLAA of which sites comprise the non-strategic housing land for 6.700 dwellings to be identified within the Swindon Urban Area (excluding the Central Area) and therefore whether they can be delivered. Furthermore the trajectory under provides against the RSS requirement for the first 10 years of the plan. In all respects Core Strategy housing provision is not justified and fails to provide a 5 year deliverable supply of housing required by PPS3 para 54.</p>	Revise housing land supply/trajectory.

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687	1	3.21 - 3.23	SSP2		Welcomes engagement in joint working to provide urban extension to the west of Swindon, identification of the broad location of the 2,000 new homes at Tadpole Farm and recognition of the implications for Swindon of the 3,000 dwellings to be provided in Wiltshire.	
687	2	3.21 - 3.23	SSP2		Consider the identification of broad locations for the development in Wiltshire is not consistent with paragraph 17(3) of the Planning and Compulsory Purchase Act 2004.	
687	3	3.21 - 3.23	SSP2		Concern over whether the Wiltshire Core Strategy will endorse the broad locations in Wiltshire identified in Swindon's Core Strategy as the Wiltshire Core Strategy is in early stages of preparation.	
687	4	3.21 - 3.23	SSP2		Acknowledges that Ridgeway Farm/Moredon Bridge are properly identified in the Core Strategy as there is strong evidence to justify their identification.	

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687	5	3.21 - 3.23	SSP2		Identification of Pry Farm is contentious as there are significant constraints in terms of flooding, availability, biodiversity, coalescence and access identified in the joint studies. These constraints do not exist at the site south of Hook Street.	<p>Change paragraph 3.21 as follows:</p> <p>Tadpole Farm - 2,000 homes and in Wiltshire at (delete 'as illustrated in Appendix 6'): Ridgeway Farm/Moredon Bridge - 1,000 homes Further sites) to be determined (delete 'Pry Farm - 2,000 homes')</p> <p>Delete Appendix 6</p> <p>Amend paragraph 3.22 as follows:</p> <p>The River Ray Corridor runs through much of this area (delete 'all of the proposed smaller scale urban extensions in this area') . . .</p>
687	6		SSP10		Welcomes the intent of joint working with Wiltshire Council to ensure the 3,000 new homes in Wiltshire as urban extension to Swindon is met and supports delivering these homes in the most sustainable way.	
687	7		SSP10		The use of the word 'must' within this policy is inconsistent with conventional policy wording but also in respect of financial contributions.	<p>Amend policy SSP10 as follows:</p> <p>Proposals for development at urban extensions) to Swindon should:</p> <p>i)</p> <p>ix) made in Wiltshire. Such contributions as may be appropriate will be sought through negotiations with developers.</p>

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688	1	3.11	SSP1		No justification given to the defined urban area boundary on the Proposals Map. Not clear whether this boundary will be redefined if and when certain proposals are adopted/permitted.	Augment paragraph 3.11 by adding to the end: . . .The definition of the Swindon Urban Area on the Proposals Map will be refined as appropriate, including through the Site Allocations DPD which will identify non-strategic housing and other development sites to meet outstanding Core Strategy development requirements.
688	2	3.11	SSP1		No evidence in the Core Strategy or the SHLAA that the strategic housing land for 6,700 dwellings to be identified at Swindon through Site Allocations DPD is able to be fully accommodated within the defined urban boundary.	
688	3	3.90	SSP1		According to the LDS, the Site Allocations DPD will complete the Proposals Map, while the Core Strategy identifies a key deliverable of this DPD as review of settlement boundaries. At present the Core Strategy provides this only in relation to development in rural settlements.	
688	4		SSP1		This policy and supporting text should not be open to interpretation as precluding allocation of sustainable housing sites adjacent to the urban area boundary where land supply and delivery considerations justify this.	
688	5		SSP2		The restriction of non-strategic housing provision to locations within the existing Swindon Urban Area is not effective, justified or consistent with PPS12.	The Core Strategy should therefore clarify that policy SSP2's reference to the Swindon Urban Area relates to the boundary as it may evolve as a result of the Site Allocations DPD.

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688	6	Figure 11	SSP2		The housing trajectory is unsound as there will be a significant 5 year and overall shortfall. It under provides against the RSS requirement for the first 10 years of the plan. The trajectory continues with such ambitious and consistent delivery at Wichelstowe, Tadpole Farm and EDA, despite the fact these cannot be reconciled with the PPS3 requirement to have a continuous deliverable supply of housing.	Review of the housing trajectory.
688	7		SSP11		Welcomes the need for sufficient flexibility to deal with changing circumstances and supports this policy in providing reasonable and effective criteria against which additional urban extensions will be determined.	
688	8		SSP11		States the policy should not solely relate to securing a supply of housing and employment land over the long term but should reflect PPS3 to maintain an up to date 5 year supply of deliverable housing sites,	Amend policy subsection A to: Policies SS2 & SS1 set out the spatial distribution of employment land and housing to meet the needs in the Borough. In order to provide a deliverable security of supply, both over 5 years and the longer term as a result of changing circumstances, an additional site or sites may need to be brought forward.
688	9	3.80 - 3.83	SSP11		Supports the identification of Kingsdown as a preferred location in Policy SSP11.	
688	10	3.80 - 3.83	SSP11		Considers the scale and timing of need for sites to meet the development requirements will be such that a flexible approach to identifying additional land on the edge of the urban area, of different sizes and locations, will be required.	

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688	11	3.80 - 3.83	SSP11		Less emphasis should be given to the Small Scale Urban Extension Study as evidence base for identification of additional sites as only tested the suitability of sites. The SHLAA should provide a more appropriate evidence base but this still has its limitations. For the Core Strategy to be robust, decisions on the additional sites should be based on the most widely drawn and up to date evidence available.	Replace paragraph 3.80 with the following: Identification of additional sites should be based on a review of existing studies, including the Small Scale Urban Extension Study and SHLAA, and other relevant and updated evidence to ensure decisions that are robust and appropriate in the prevailing circumstances.
688	12	3.80 - 3.83	SSP11		The policy refers to 'an additional site or sites' however it focuses on one potential reserve site. To be effective the site should list other potential contributor sites in the Borough, e.g. site south of Hook Street	Preface paragraph 3.81 as follows: Various sites have been assessed in the SSUES and SHLAA as having potential for (housing) development but do not form part of the spatial strategy. These include Kingsdown and land north of Hook Street. The Preferred Options identified land at Kingsdown
688	13	3.80 - 3.83	SSP11		Paragraph 3.80 refers to "exception sites" when addition or reserve would be more appropriate.	
688	14	3.80 - 3.83	SSP11		Do not understand the purpose and meaning of paragraph 3.83 which appears to relate policy SSP11 action to remedy failure in the Borough's land supply to sites outside the Core Strategy.	Clarify paragraph 3.83.
689	1		CP4		The Group note the supporting text's recognition that the Swindon Housing Market Assessment evidence base indicated a 30% contribution to affordable housing would be sufficient. It may be that a blanket approach and increase in the RSS affordable housing target to address a real and acute problem in parts of the region is inappropriate for a small number of locations, including Swindon. Furthermore the RSS is not yet adopted.	The Core Strategy should give greater weight to the evidence base and proffer a more general conformity to the RSS and provide for a 30% target across the Borough. Adjustments should also be made to site specific policies.

<i>Respondent Ref</i>	<i>Comment No.</i>	<i>Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
689		2	DMP4		<p>Although CP4 contains a viability clause, this relates to an overall annual target. To be an effective policy, DMP4 should provide guidance on how this will operate and that this should be through an explicit reference to the negotiation of the proportion of affordable housing for each proposal to reflect the individual circumstances of the site and its impact on viability.</p>	<p>Change DMP4 (A) from 35% to 30%.</p> <p>Add a further criterion to DMP4 (A):</p> <p>iv) The provision of affordable housing will be negotiated on a site by site basis taking into account the viability of the development, the mix of affordable housing proposed and, if available, public funding.</p>
689		3	DMP2		<p>Subsection A of this policy identifies the types of provision for which contribution will be sought, and A (iii) states developments should provide for the ongoing maintenance of facilities provided as a result of the development. Paras B18 and B19 of Circular 05/2005 only allow for a maintenance contribution to be required where the facilities are predominantly for the benefit of the users of the associated development. The words "where necessary make appropriate" are used, but it is felt greater clarification of the legitimate circumstances in which such contributions will apply is needed.</p>	<p>Amend DMP2 A (iii) to read "provide for the ongoing maintenance of ON SITE facilities".</p>

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689		4	DMP2		<p>Subsection B of this policy identifies the components of a future SPD. The associated footnote (13) mentions the Developer Contributions Development Control Guidance Note (2006), which sets out a tariff based system. It is unsound because it fails to comply with Para B26 of Circular 05/2005 which requires that policies regarding the quantum and specific localities should be set out in a SPD. The DCGN does not meet the standards required of a SPD. Preparation of the SPD is not included in the Council's current Local Development Scheme. The LDS identifies candidate areas for the possible production of SPDs and, from the heading, DCGNs, the need for which will be reviewed through annual monitoring over the next 5 years. An update and refresh of the existing DCGN is noted as one candidate area (but apparently to take the form of DCGN not an SPD as indicated by DMP2 and required by national policy). The Council have had adequate time to undertake an SPD but they have not taken any action and this has been raised with them.</p> <p>The EDAW Social Infrastructure Model (para 4.22) is referred to as supplementing this review and at para 4.26 under the heading "Evidence Based Documents" is not listed on the Council's web page under evidence base nor can it be found elsewhere on the website. This all further undermines the soundness of the provisions and supporting justification for policy DMP2.</p> <p>Furthermore, at appeal DCGN (2006) has been found to be defective (e.g. APP/U3935/A/09/2094198. Hillside House, Highworth) and so there must be</p>	<p>Confirm that the DCGN (2006) should not be a blanket policy and each proposal should be assessed on its own merits. Parts of the DCGN are unlawful and should be reviewed at the earliest opportunity.</p> <p>Delete Para 4.22 reference to the Developer Contributions for Residential Development (2007) as it has not been properly consulted on and was considered by many to be unsound.</p>

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doubt as to whether it is sound for the
Core Strategy to rely on it.

<i>Respondent Ref</i>	<i>Comment No.</i>	<i>Paragraph No.</i>	<i>Policy</i>	<i>Proposals Map</i>	<i>Comment Summary</i>	<i>Proposed changes</i>
689		5	DMP2		<p>There is no mention of the Core Strategy's proposal (in SSP8 and para 3.71) that the EDA would be subject to a separate S.106 tariff system to that established for the remainder of the Borough due to the individual circumstances of the site/proposal. DPDS Client Group is of the view that all major development proposals, including urban extensions, have clear and distinct individual circumstances and needs for physical, social and environmental infrastructure and facilities provision to achieve effective delivery of a sustainable community and that the impacts of this on viability and phasing of the proposals will likewise vary. There is no proper justification for the use of a different tariff for the EDA than other major sites - contributions required from any development should, by definition (Circular 05/2005 paras B8-9), be necessary in planning terms and fairly and reasonably related in scale and kind to the proposed development and reasonable in all other respects.</p> <p>Policy DMP2 should provide for all major development to be subject to an individual S.106 agreement specific to their circumstances which complies with Circular 05/2005; reflects a sound, consistent and justifiable evidence base and recognises that developer contributions for all urban extensions should be considered on their merits; and ensures that proposals are deliverable. Otherwise the inference of this separate provision may be that the Council recognises the EDA would not be financially viable. While the Council has sought information on costs of infrastructure, no evidence has been</p>	<p>Delete the provisions for a separate tariff from SSP8 D iii) and text para 3.71.</p> <p>Add the following additional text to the end of DMP2:</p> <p>C - All (major) development is to be subject to a site/proposal specific S.106 Agreement which is: Directly related to each proposed development; Fairly and reasonably related in scale and kind to each proposed development; Are necessary to render each proposed development acceptable in planning terms and; Are reasonable in all other respects.</p>

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					provided that a full financial viability exercise has been undertaken, including an open book inspection of all option agreements (some of which are publicly available).	
689	6	4.31-4.33	DMP2		Paras 4.31 and 4.32 of the Core Strategy set out a scheme for deferring contributions until economic conditions improve. DPDS Client Group considers this is effectively a tax on land values and is not reasonable, as defined in para B5 of Circular 05/2005, because if economic conditions were to deteriorate during development there is no mechanism for the Council to refund contributions to a developer. To be reasonable as required by Circular 05/2005 the Council must be even handed.	Delete paras 4.31 to 4.33.
					Shorter planning consents as proposed in para 4.33 to the Core Strategy would not be effective in achieving the stated aims of bringing forward development. Green field development takes considerable time to come forward and shorter consents than 3 years would not be practical. Interference in the local housing market may have unintended consequences and impact on surrounding sites, viability and speed of delivery.	
690	1		General		On this occasion we have no comments to make	
691	1	Spatial Vision	Spatial Vision		In principle welcome the identification of a "cutting edge" university to be developed in the regenerated town centre.	

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691	2		CP2		The University recognises higher education as 'essential infrastructure' in order to develop knowledge-based industry within Swindon and we would seek to work collaboratively with local businesses and institutions.	It is recommended that the University of the West of England is included as an organisation listed within paragraph 2.13
691	3		CP3		Welcome the inclusion of education as one of the sectors that will be the focus of the spatial policy. Agree that higher education is a crucial aspect of overall economic development of the town	
691	4		CP6		Fully endorse the content of this policy and specifically point v) which recognises that a new university in Swindon will support the continued growth of the economy.	
691	5		CP6		Need to ascertain the preferred strategy for delivering higher education. It is critical that a flexible approach to delivering the university is taken that is reflective of commercial and planning constraints. Whilst acknowledge the preferred approach of delivering a facility within the North Star area, the University does not believe this should be exclusive.	The policy should be broadened to have a greater flexibility which would enable wider town centre site to be considered, including links with local businesses and the Great Western Hospital.
691	6		SSP4		Welcome the inclusion within point E that a new tertiary education campus should be provided in the Central Area.	
691	7		SSP4		Seek clarification from the Council regarding the rationale in limiting the number of students to 7,000. The Swindon Gateway proposals sought to develop a campus that would cater for 8,000 students.	Recommend that the words 'up to' is replaced by 'approximately' until such time as an appropriate capacity analysis has been completed as part of the business case for new university facilities in Swindon.

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691		8	SSP7		The university currently works alongside the Great Western Hospital in delivering specifically healthcare education and would wish this partnership approach to be recognised given the value this provides to our students.	
692		1	SSP9		Support proposed Tadpole Farm site especially if it is designed in similar fashion to the Redhouse Way/Eastbury Way area.	
693		1	SSP7		Development at Coate will have an adverse affect on traffic along Marlborough Road and through Old Town during rush hour.	
693		2	SSP7		How will wildlife at Coate Water be protected from the noise and general upheaval of all the building work at Coate. Wildlife will be driven away as has happened in Wichelstowe.	
693		3	SSP7		Are there any plans for expansion of the hospital as recent experience has shown that they are already running out of space.	
694		1	SSP9		Allowing access to/from Tadpole Farm through residential areas in Redhouse would not work as the parking of cars on these roads would not allow access for the increased traffic. On street parking takes place in Redhouse as not enough off-street parking was provided.	Local infrastructure such as schools health facilities should be in place which provides for the existing communities as well as nay new homes at Tadpole. Direct through traffic away from existing residential areas in Redhouse.
695		1	SSP9		Allowing access to/from Tadpole Farm through residential areas in Redhouse would not work as the parking of cars on these roads would not allow access for the increased traffic. On street parking takes place in Redhouse as not enough off-street parking was provided.	Local infrastructure such as schools health facilities should be in place which provides for the existing communities as well as nay new homes at Tadpole. Direct through traffic away from existing residential areas in Redhouse.

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696	1		CP5		Consider that policy CP5 is not effective as it does not recognise that there are established retail sites in out of centre locations which have planning permission for open A1 use, this includes Units 1 and 2 Ocotal Way.	Consider that policy CP5 should be amended to recognise that retail development should be allowed to take place on sites which already have planning permission for open A1 use. Provided there is no increase in floorspace then redevelopment would not negatively impact upon the town centre.
697	1		General		<p>Many general assumptions are made, such as population growth, but with no forecast of actual figures. Thus it is impossible to make any sensible suggestions on any of the 'proposals'.</p> <p>It is stated that the document has evolved from previous comments "along with progress made on the evidence base of other Council strategies"; yet no evidence is presented and the strategies are neither stated nor defined.</p>	
698	1	xvii	General		There is a lack of reference to the North Wessex Downs AONB in accordance with Government and RSS Policy.	Make greater reference to North Wessex Downs AONB (a) at paragraph xvii; and (b) separate Development Management Policy.