

Appendix 2 - Objection Summaries and Responses: Backland and Infill Development Supplementary Planning Document

	<i>Obj. No.</i>	<i>Guidance Note</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Chiseldon Parish Council	1	BI		The character of a neighbourhood can be destroyed when developers pursue the practice of dividing large gardens and building one or more additional dwellings on the site.	This guidance is designed to advocate best practice, to ensure that such developments do not give rise to unacceptable amenity impacts.
Chiseldon Parish Council	2	BI		Gardens should be appropriate to the size of the dwelling and remain a similar size to those of neighbouring houses.	This is emphasised within Para's: 2.6 - 2.11
Chiseldon Parish Council	3	BI	1.5	Support - Consider it important for the maintenance of a sense of community that the villages of Chiseldon, Hodson, Badbury retain their separate identities and do not become absorbed into urban Swindon.	The document emphasises character is important. The villages listed are also covered by Conservation Area Appraisals, which provide further protection of character.
Chiseldon Parish Council	4	BI	2.0	Supporting - in addition, landscaping is also important. Village streetscenes usually contain more vegetation than urban ones. This should be reflected in developments in rural areas. Developments at John Alder Close, Chiseldon and Co-Op old town look at odds with surroundings as there is no vegetation.	Para 2.35 added to discuss characteristic landscaping
Fairhurst (UK) Ltd	1	BI		Status of the Document We note that you are seeking SPD status of the document. However, as it is not specifically referred in the Approved Local Development Scheme it cannot constitute formal SPD. You could, however, term it a development control guidance note.	The document is listed on page 11 of the Swindon Borough Local Development Scheme (1st Revision)

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Fairhurst (UK) Ltd	2	BI		<p>Woking Borough Council Plot Sub-Division: 'Infilling' and 'Backland' development SPG</p> <p>We note the acknowledgement to Woking Borough Council for use of diagrams. However, the text of the draft borrows material from the Woking document and, in a number of cases, directly copies for example paragraph 2.5 layout, 2.8, 2.12, 2.38 and so on.</p> <p>This puts into question whether the document is Swindon related or indeed based on particular characteristics of the Borough's built up areas or simply copied from one other LPA.</p>	Diagrams now amended specifically for Swindon, text amended too

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Fairhurst (UK) Ltd	3	BI		<p>Use of quotations from Inspectors Appeal Decisions: We consider it wholly inappropriate to quote inspector's appeal decisions in the manner suggested. All Inspectors' decisions are taken on the individual merits of the case as all sites are unique. We could quote a number of Inspectors who have supported 'backland' development at The Broadway, 180-182 Oxford Road, Harbour Close and so on. You should be aware that the Planning Inspectorate's guidance note on this matter states that there are no prescribed standards for the protection of residential amenity. I have attached a copy of this and would draw your attention specifically to paragraphs 6, 9, 13, 15, 18, 19 and 22. Specifically you will note from the advice that there is no prescription on say 0.4ha or any other 'rule of thumb'. Paragraph 38 of PPS1 states that 'Local Planning Authorities should not attempt to impose architectural styles or tastes' and 'should not stifle innovation, originality or initiative'. We consider that paragraphs 2.1 to 2.4 would stifle 'originality'.</p> <p>We suspect that the GOSW, should you have consulted them will similarly object given the clear instructions to</p>	<p>Appeal decisions where inspectorate has allowed the appeal are now included to provide a more balanced view point. They are equally helpful in establishing what would/wouldn't be acceptable.</p> <p>The document has now been amended to remove some of the specific requirements, such as minimum plot size.</p> <p>It is not considered that para' 2.1 - 2.4 stifle originality. There is no reason why innovative or original design elements cannot be incorporated into such schemes that are in character with the local area.</p> <p>GOSW were consulted on the document but raised no objections.</p>

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Fairhurst (UK) Ltd	4	BI		<p>One Size Fits All: Paragraph 2.23 suggests that It is unlikely that a satisfactory two storey development could be achieved on a site of less than 0.4ha /1 acre.. We would dispute this assertion on a number of points. There are numerous examples in the Borough where 2 storey development has been satisfactorily accommodated on sites significantly less than 0.4ha. Infill sites are more than likely to be less than 0.4ha but more than capable of accommodating a two storey dwelling. At average density (30 dph) 0.4ha should provide some 12 dwellings. Overlooking distances are accepted and can be accommodated on plots of less than 0.4ha. The relationship between rear garden development and impact on amenity of dwellings say adjoining the rear gardens of their properties is more difficult. The Inspectorates guidance refers to impact on private areas but does not necessarily rule out development close to the rear garden of a neighbouring property. We consider in these circumstances that one size does not fit all. The SPD applies this and seems to simply replicate pararaph 4.3 in the Woking Guidance without much thought to specific site circumstances.</p>	Agree: Reference to minimum site size deleted
Fairhurst (UK) Ltd	5	BI		<p>Minute No 208 of Planning Committee 13/2/2007 Planning Committee have not authorised you to make changes simply minor drafting or typographical changes. This suggests a fait accompli where no substantive changes will be made to the document as a result of this consultation document.</p>	<p>This is a misunderstanding - The resolution at Planning Committee permits amendments/corrections to be made to any errors in the draft prior to consultation. The revised draft will be reported back to committee along with all objections and responses made.</p>

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Fairhurst (UK) Ltd	6	BI		It would appear that the document has been prepared in haste and without much consideration of the specific circumstances pertaining to the Borough. Policy DS6 (Standards of Design and Amenity) of the Local Plan provides adequate guidance for 'backland' sites and should be implemented accordingly using acknowledged 'rules of thumb' such as separation distances. It is my opinion that Development Control implements this policy on residential applications whether they be 1 plot or in the case of the Southern Development Area, 4,500 plots.	The document has been designed to give particular references to Infill and Backland development, using principles of good design already established and consistently used within the Borough.
Fairhurst (UK) Ltd	7	BI		Explanation of Terms - Backland Development There is an inconsistency in the draft on the definition of Backland Development (explanation of terms) and that shown in the box on page 4. We do not consider that industrial buildings, builders yards or disused allotment sites can be described as Backland Development.	Agree to some extent: Backland definition amended to same as in the Swindon Borough Local Plan 2011. The last sentence is essential if backland development is to respect that character of the area it is in.
Fairhurst (UK) Ltd	8	BI		Delete last sentence. To meet the objection the document should not be adopted as a supplementary planning document or in any other form that would be material to the consideration of a planning application.	The document is clearly listed in the LDS and is designed to inform and serve as a material consideration for planning applications.
Fairhurst (UK) Ltd	9	BI		Explanation of Terms Tandem Development The reference to 'rows' of dwellings is misleading. There will be circumstances where a single dwelling to the rear could be appropriate. Rerword to read "Tandem" development consists of a dwelling or rows of dwellings immediately"	Agree: Text amended

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Fairhurst (UK) Ltd	10	BI		<p>Explanation of Terms Habitable Rooms</p> <p>The reference to kitchens is misleading as this is not a habitable room in the strictest sense.</p> <p>Replace i.e. not landings, hallways, toilets and in some cases kitchens with</p>	<p>Agree in principle: Kitchen no longer listed as a habitable room</p>
Fairhurst (UK) Ltd	11	BI		<p>Context</p> <p>We consider that the first sentence is an inappropriate start for the document. It is highly probable that where development is proposed on rear gardens communities may well view this as an imposition. Nevertheless it is not the purpose of the planning system to be dictated solely by the views of local people. It is the purpose of the planning system to weigh up all material considerations prior to decision. There will of course be circumstances where proposals are inappropriate to the amenity of existing residents for example where they overlook unacceptably. Equally there will be circumstances where development is entirely acceptable.</p> <p>The guidance does not specify the circumstances where rear garden development can provide additional choice and make a valuable contribution to meeting housing need. Other benefits include for example secure by design where a development at Moredon Road secured overlooking of a pedestrian footpath.</p> <p>Replace the first sentence with the following:- "Where Backland and infill development is carefully designed it can make a valuable contribution to the provision of new homes thereby reducing the need for Greenfield sites."</p>	<p>Agree to some extent: Paragraph 1.1 amended to refer to both potential positive and adverse impacts that backland and infill development can have.</p>

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Fairhurst (UK) Ltd	12	BI	1.2	Government Housing Policy We consider that PPS3 supports such development in principle. It does not 'generally' support.	Agree: 'Generally' deleted, Extract from PPS1 added to emphasise good design.
Fairhurst (UK) Ltd	13	BI		Delete 'generally' from the 4th Extract of the Swindon Design Guide 2006: Infill Development We would question whether infill sites have been identified in the Conservation Area appraisals. It would be construed that if such infill plots are not identified in the appraisals they will be deemed inappropriate which is misleading and contrary to Section 38(6) of the Act. Delete sentence "(In Conservation Areas ... appraisal of the area)".	Gaps deemed important to the character of the conservation areas have been included in the conservation area appraisals. However, text rationalised to retain focus.
Fairhurst (UK) Ltd	14	BI		Extract of the Swindon Design Guide 2006: Backland Development The reference to some Backland Development causing problems is somewhat generalised and unqualified. In these circumstances it adds nothing to the document of any value. Delete sentence "However, some Backland Development can cause problems and will be refused planning permission".	Agree: Deleted

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Fairhurst (UK) Ltd	15	BI		<p>Extract from Swindon Design Guide 2006 Backland Development</p> <p>The last paragraph in the box is inconsistent with the general approach to good quality design advised in PPS1 paragraph 33 to 39 and specifically paragraph 38 - 'design policies should avoid unnecessary prescription', that 'Local Planning Authorities should not attempt to impose architectural styles or particular tastes' and that they 'should not stifle innovation, originality or initiative'. We consider that the whole document is contrary to the spirit of the design guidance in PPS1.</p> <p>Delete "The Borough Council will normally expect any infill and shape and proportions of buildings.</p>	<p>The document is designed to encourage good design and deliver sustainable development that meets the key principles and spirit of PPS1.</p>
Fairhurst (UK) Ltd	16	BI	1.6	<p>Appeal Decisions</p> <p>We consider it wholly inappropriate to quote inspector's appeal decisions in the manner suggested. All Inspectors' decisions are taken on the individual merits of the case as all sites are unique. We could quote a number of inspectors who have supported 'backland' development at The Broadway, Oxford Road and so on. You should be aware that the Planning Inspectorate's guidance note on this matter states that there are no prescribed standards for the protection of residential amenity. I have attached a copy of this and would draw your attention specifically to paragraphs 6, 9, 13, 15, 18, 19 and 22. Specifically you will note from the advice that there is no prescription on say 0.4ha or any other 'rule of thumb'.</p> <p>Delete paragraph 1.6 and all subsequent quotations from Inspector's decision letters.</p>	<p>Agree to use inspectors comments from appeals that have been allowed to provide a more balance approach, which will help set a benchmark as to what would be acceptable in a proposal.</p> <p>It is accepted that there are no perscribed standards for residential amenity or it can only be determined on a cases by case basis. However, there are certain criteria that assist in ensuring that residential amenity is protected. The SPD covers expectations of schemes that must meet there criteria or a minimum.</p>

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Fairhurst (UK) Ltd	17	BI	2.0	<p>General Requirements: The approach is inconsistent with the general approach to good quality design advised in PPS1 paragraph 33 to 39 and specifically paragraph 38 - 'design policies should avoid unnecessary prescription', that 'Local Planning Authorities should not attempt to impose architectural styles or particular tastes' and that they 'should not stifle innovation, originality or initiative'. We consider that the whole document is contrary to the spirit of the design guidance in PPS1.</p>	<p>The document is designed to encourage good design and deliver sustainable development that meets the key principles and spirit of PPS1. There is significant scope for innovation of design within the basic parameters of paras 2.1 - 2.4 and spirit of PPS1.</p>
Fairhurst (UK) Ltd	18	BI	2.5	<p>Delete paragraphs 2.1 to 2.4 Layout, Diagrams 1 and 2 We consider that the approach is too prescriptive and not backed up by any conclusive evidence that the development depicted in diagram 2 is harmful. This type of development has been supported in the past for example at 180 – 182 Oxford Road, Swindon (application ref: S/04/2896 – Appeal, ref: APP/U3935/A/03/1174711).</p> <p>Delete paragraph 2.5 and diagrams 1 and 2.</p>	<p>Agree to some extent: Diagrams amended, but the emphasis that existing character should be retained as best practice fundamental to securing acceptable development that are in character with their surroundings.</p>
Fairhurst (UK) Ltd	19	BI	2.11	<p>Garden Amenity: We consider that paragraphs 2.6 to 2.12 are unduly prescriptive. In particular 2.11 introduces the requirement for garden sizes to be at least that of the floor space of the house. We can find no Government advice to support this proposal. It can only be assumed therefore that it is simply a figure plucked from the air that would simply unduly constrain otherwise acceptable development without good cause.</p> <p>Delete paragraph 2.11.</p>	<p>Agree: Minimum garden size is too prescriptive and lacks justification. Paragraph deleted.</p>

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Fairhurst (UK) Ltd	20	BI	2.12	Garden Amenity: We consider that shared amenity areas will always be appropriate for flats. We do not foresee any circumstances where shared gardens would be appropriate for houses.	No evidence has been put forward to suggest that it should always be suitable that apartments should always have shared amenity space. Such a requirement would be too prescriptive.
Fairhurst (UK) Ltd	21	BI	2.13	Amend first sentence to read "shared amenity areas will always be appropriate Amenity: We consider this paragraph to be wholly inappropriate. All proposals should be considered on their individual merits. A developments impact should be considered against all of its surroundings. There is no justification to single out occupiers of the existing or host dwelling in the way suggested.	Agree: Paragraph adds virtually nothing and has been deleted.
Fairhurst (UK) Ltd	22	BI	2.16	Delete paragraph 2.13. Amenity: The first sentence of paragraph 2.16 is entirely inappropriate. We do not consider that good neighbourliness and fairness are yardsticks against which proposals can be measured. They are simply unquantifiable and provide nothing useful to the document.	Agree to some extent: Sentence amended to more appropriate wording with quantifiable
Fairhurst (UK) Ltd	23	BI	2.21	Amenity: The references to the '45 degree code' are confusing. Is it a 'strict rule', 'rough guide' or a 'rule of thumb'? The second sentence refers to it as not 'a strict rule'. However in the following sentence it is applied as a strict rule. Nevertheless the use of the 45 degree code has been taken out of context as it generally applies to extensions to existing dwellings where by virtue of height and length there are situations where extensions would reduce natural light unacceptably to neighbouring dwellings in close proximity. Delete paragraph 2.21.	The principle of the 45 degree rule is already Council Policy in the House Extensions SPG. It equally applies to new dwellings

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Fairhurst (UK) Ltd	24	BI	2.23	<p>Privacy and Overlooking:</p> <p>We support the fact that sufficient separation between dwellings should be provided to avoid excessive overlooking. However, we can find no justification in Government advice that a site needs to be 0.4 ha before two storey development is acceptable. The Borough Council's use of separation distances is already in place to cover consideration of planning applications and consequently we question why this additional test is necessary.</p> <p>Paragraph 2.23 suggests that "It is unlikely that a satisfactory two storey development could be achieved on a site of less than 0.4ha /1 acre" We would dispute this assertion on a number of points. There are numerous examples in the Borough where 2 storey development has been satisfactorily accommodated on sites significantly less than 0.4ha. Infill sites are more than likely to be less than 0.4ha but more than capable of accommodating a two storey dwelling. At average density (30 dph) 0.4ha should provide some 12 dwellings. Overlooking distances are accepted and can be accommodated on plots of less than 0.4ha. The relationship between rear garden development and impact on amenity of dwellings say adjoining the rear gardens of their properties is more difficult. The Inspectorates guidance refers to impact on "private areas" but does not necessarily rule out development close to the rear garden of a neighbouring property. The SPD seems to simply replicate paragraph 4.3 in the Woking Guidance without much thought to specific site circumstances.</p> <p>This level of prescription is simply not acceptable or endorsed by any Government guidance. For example 180-182 Oxford Road, Swindon, which was granted on appeal for 7 dwellings is 0.17 ha.</p>	Agree: Minimum site size deleted.

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			<p>If objecting to this part of the SPD or SA, please indicate what change you are seeking to make to the SPD or SA that could resolve your objection:</p> <p>Delete the second sentence of paragraph 2.23.</p>		
Fairhurst (UK) Ltd	25	BI	2.25	<p>A kitchen is not a habitable room and there are many examples of both modern and older development where kitchens are in close proximity to each other.</p>	Agree: Deleted as suggested
Fairhurst (UK) Ltd	26	BI	2.27 - 2.28	<p>We consider that this paragraph would be more logically placed after the heading to paragraph 2.28. We consider that 21m is a more acceptable overlooking distance between facing windows of habitable rooms. This is the usual 'rule of thumb' adopted by the Borough Council.</p> <p>Combine paragraphs 2.27 and 2.28 and</p>	Agree to some extent, paragraphs combined, now para 2.6.
Fairhurst (UK) Ltd	27	BI	2.29	<p>Access and Car Parking: We consider this paragraph in somewhat sweeping and generalised. Under what circumstances would noise, danger and visual amenity apply?</p> <p>Delete paragraph.</p>	<p>This section has been moved to make the document easier to read and more logical.</p> <p>The statement is retained as the issues raised are material considerations and can lead to a refusal of consent.</p>

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Fairhurst (UK) Ltd	28	BI	2.36	<p>We note the reference to Conservation Area Appraisals. It should be noted that the Conservation Area Appraisals have not always been supported by Appeal Inspectors. Notable decisions include Westlecott House, Westlecot Road and land adjacent The Ferns, Front Lane, Blunsdon. We consider that the paragraph places undue weight on the Conservation Area appraisals.</p> <p>Amend sentence to read "Any development proposal in a Conservation Area will be judged on its affect on the areas character and appearance".</p>	Paragraph amended but Conservation Area Appraisals are adopted SPG and therefore are a material planning
Fairhurst (UK) Ltd	29	BI	3.8	<p>Infill Access: Supported We support in certain circumstances shared driveways which have advantages from highway safety point of view by limiting number of access points.3.8 Boundary Treatment: We consider this requirement to be unduly prescriptive and not supported by Government advice. We would suggest that different boundary treatments are typical of Swindon's streets. This adds variety to street frontages.</p>	This is important to create a consistent street scene. If an existing street is characterised by a range of boundary treatments, then this element of the guide would not be applicable as it relates specifically to frontages 'matching' the prevailing street scene.
Fairhurst (UK) Ltd	30	BI	4.2	<p>Delete paragraph 3.8 and diagram 8.</p> <p>Piecemeal Development: We consider that the provision of guidance for 'piecemeal development' is difficult given the differing nature of sites and land ownership patterns. We consider that where proposals meet acceptable standards to protect existing residential amenity and so on that permission should be granted.</p> <p>Delete paragraph 4.2.</p>	This is a major problem of infill/backland development in Swindon and could prejudice the more appropriate delivery of a more comprehensive scheme that could serve to maximise development on previously developed land.

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Fairhurst (UK) Ltd	31	BI	4.3	<p>Tandem Development:</p> <p>We consider that where tandem development meets the overlooking distances and is otherwise acceptable it should be permitted. For example where a dwelling is situated behind an existing dwelling as depicted in diagram 9 then provided it is sited 22m distant then overlooking problems can be avoided. We do not consider that all tandem development would necessarily be harmful for all of the reasons stated in paragraph 4.3.</p> <p>Amend paragraph to be more permissible as suggested above.</p>	<p>Agree to some extent: Tandem development is now put in with backland as the principles are similar. However, it is more likely to give rise to adverse amenity impacts by its nature and unless it meets the criteria required for general backland development will be refused.</p>

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Fairhurst (UK) Ltd	32	BI	4.4	<p>We do not support the reference to 0.4 ha as the site size threshold.</p> <p>There are numerous examples in the Borough where 2 storey development has been satisfactorily accommodated on sites significantly less than 0.4ha. Infill sites are more than likely to be less than 0.4ha but more than capable of accommodating a two storey dwelling. At average density (30 dph) 0.4ha should provide some 12 dwellings.</p> <p>Overlooking distances are accepted and can be accommodated on plots of less than 0.4ha. The relationship between rear garden development and impact on amenity of dwellings say adjoining the rear gardens of their properties is more difficult. The Inspectorates guidance refers to impact on "private areas" but does not necessarily rule out development where new dwellings are sited close to the rear garden of a neighbouring property. One size does not fit all. The SPD seems to simply replicate paragraph 4.3 in the Woking Guidance without much thought to specific site circumstances.</p> <p>Equally there maybe circumstances where development of rear gardens is secured by the use of an access road that does not serve the host dwelling. We consider that this form of development where it meets acceptable levels of residential amenity should not be ruled out by the guidance.</p> <p>Amend paragraph 4.4 to read. "On sufficiently large plots where it is possible to achieve separation between dwellings to overcome these difficulties development will be permitted. Development will also need to ensure that the amenities of all surrounding dwellings, together with the original 'host' dwelling can be safeguarded".</p> <p>Delete diagram 10.</p>	<p>Agree: Reference for minimum site size now deleted. Diagram 10 is also deleted as it is confusing.</p>

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Fairhurst (UK) Ltd	33	BI	4.6	<p>We consider this paragraph to be somewhat sweeping and unjustified as to why such access can be problematic. It adds nothing of substance to the document and should be deleted.</p> <p>Delete paragraph 4.6.</p>	Agree Paragraph deleted
Fairhurst (UK) Ltd	34	BI	4.7	<p>We consider that the last sentence is somewhat sweeping and unjustified. In general terms we support dual access use but in some cases this may not be possible. In what circumstances would multiple access points be discouraged? If an additional access point is acceptable in terms of highway safety and Government advice in "Manual for Streets" we see no reason why it should not be permitted.</p> <p>Either justify why multiple access points will be discouraged or delete the last sentence of paragraph 4.7.</p>	Agree to some extent: Text amended to provide justification
Fairhurst (UK) Ltd	35	BI	4.9	<p>We consider that the word nuisance in the last sentence of the paragraph is inappropriate given that it is not readily measurable.</p> <p>We suggest that 'adverse impact' would be more appropriate and measurable in the planning context.</p> <p>Delete 'nuisance' and replace with 'adverse impact'.</p>	Agree: 'adverse impact' added and 'nuisance' deleted.
Fairhurst (UK) Ltd	36	BI	Diagram 13	<p>Diagram 13</p> <p>We consider that diagram 13 is misleading. There is no scale provided to check whether adequate distances have been maintained. It would appear that the garden sizes are significantly over the floor space for the dwellings proposed suggesting that PP3 minimum density of 30dph is not met.</p> <p>Either amend Diagram 13 in light of the above or delete it.</p>	Agree: Diagram replaced with something less complex and easier to understand.

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Fairhurst (UK) Ltd	37	BI	checklists	<p>Checklist for Applicants:</p> <p>We do not support the checklist as it seems to list only a number of points arising from the main document.</p> <p>Delete checklist.</p>	<p>This checklist serves a purpose of informing both developers and officers on the key points of best practice</p>
Hannick Homes & Development Ltd	1	BI		<p>Status of the Document We note that you are seeking SPD status of the document. However, as it is not specifically referred in the Approved Local Development Scheme it cannot constitute formal SPD. You could, however, term it a development control</p>	<p>The document is listed on page 11 of the Swindon Borough Local Development Scheme (1st Revision)</p>
Hannick Homes & Development Ltd	2	BI		<p>Woking Borough Council Plot Sub-Division: 'Infilling' and 'Backland' development SPG.</p> <p>We note the acknowledgement to Woking Borough Council for use of diagrams. However, the text of the draft borrows material from the Woking document and, in a number of cases, directly copies for example paragraph 2.5 layout, 2.8, 2.12, 2.38 and so on.</p> <p>This puts into question whether the document is Swindon related or indeed based on particular characteristics of the Borough's built up areas or simply copied from one other LPA.</p>	<p>Diagrams now amended specifically for Swindon, text amended too</p>

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Hannick Homes & Development Ltd	5	BI		<p>Minute No 208 of Planning Committee 13/2/2007 Planning Committee have not authorised you to make changes simply minor drafting or typographical changes. This suggests a fait accompli" where no substantive changes will be made to the document as a result of this consultation document.</p>	This is a misunderstanding - The resolution at Planning Committee permits amendments/corrections to be made to any errors in the draft prior to consultation. The revised draft will be reported back to committee along with all objections and responses made.

	<i>Obj. No.</i>	<i>Guidance Note</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Hannick Homes & Development Ltd	6	BI		It would appear that the document has been prepared in haste and without much consideration of the specific circumstances pertaining to the Borough. Policy DS6 (Standards of Design and Amenity) of the Local Plan provides adequate guidance for 'backland' sites and should be implemented accordingly using acknowledged 'rules of thumb' such as separation distances. It is my opinion that Development Control implements this policy on residential applications whether they be 1 plot or in the case of the Southern Development Area, 4,500 plots.	The document has been designed to give particular references to Infill and Backland development, using principles of good design already established and consistently used within the Borough.
Hannick Homes & Development Ltd	7	BI		To meet the objection the document should not be adopted as a supplementary planning document or in any other form that would be material to the consideration of a planning application.	The document is clearly listed in the LDS and is designed to inform and serve as a material consideration for planning applications.
Hannick Homes & Development Ltd	8	BI		Explanation of Terms - Backland Development There is an inconsistency in the draft on the definition of Backland Development (explanation of terms) and that shown in the box on page 4. We do not consider that industrial buildings, builders yards or disused allotment sites can be described as Backland Development.	Agree to some extent: Backland definition amended to same as in the Swindon Borough Local Plan 2011. The last sentence is essential if backland development is to respect that character of the area it is in.
Hannick Homes & Development Ltd	9	BI		Delete last sentence. Explanation of Terms Habitable Rooms. The reference to kitchens is misleading as this is not a habitable room in the strictest sense. Replace "i.e. not landings, hallways, toilets and in some cases kitchens with	Agree in principle: Kitchen no longer listed as a habitable room

	<i>Obj. No.</i>	<i>Guidance Note</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Hannick Homes & Development Ltd	10	BI		<p>Explanation of Terms Tandem Development</p> <p>The reference to 'rows' of dwellings is misleading. There will be circumstances where a single dwelling to the rear could be appropriate.</p> <p>Reword to read "Tandem" development consists of a dwelling or rows of dwellings immediately"</p>	Agree: Text amended
Hannick Homes & Development Ltd	11	BI		<p>Context</p> <p>We consider that the first sentence is an inappropriate start for the document. It is highly probable that where development is proposed on rear gardens communities may well view this as an imposition. Nevertheless it is not the purpose of the planning system to be dictated solely by the views of local people. It is the purpose of the planning system to weigh up all material considerations prior to decision. There will of course be circumstances where proposals are inappropriate to the amenity of existing residents for example where they overlook unacceptably. Equally there will be circumstances where development is entirely acceptable.</p> <p>The guidance does not specify the circumstances where rear garden development can provide additional choice and make a valuable contribution to meeting housing need. Other benefits include for example secure by design where a development at Moredon Road secured overlooking of a pedestrian footpath.</p> <p>Replace the first sentence with the following:- "Where Backland and infill development is carefully designed it can make a valuable contribution to the provision of new homes thereby reducing the need for Greenfield sites."</p>	Agree to some extent: Paragraph 1.1 amended to refer to both potential positive and adverse impacts that backland and infill development can have.

	<i>Obj. No.</i>	<i>Guidance Note</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Hannick Homes & Development Ltd	12	BI	1.2	Government Housing Policy We consider that PPS3 supports such development in principle. It does not 'generally' support. Delete 'generally' from the 4th	Agree: 'Generally' deleted, Extract from PPS1 added to emphasise good design.
Hannick Homes & Development Ltd	13	BI		Extract of the Swindon Design Guide 2006: Infill Development We would question whether infill sites have been identified in the Conservation Area appraisals. It would be construed that if such infill plots are not identified in the appraisals they will be deemed inappropriate which is misleading and contrary to Section 38(6) of the Act. Delete sentence "(In Conservation Areas ... appraisal of the area)".	Gaps deemed important to the character of the conservation areas have been included in the conservation area appraisals. However, text rationalised to retain focus.
Hannick Homes & Development Ltd	14	BI		Extract of the Swindon Design Guide 2006: Backland Development. The reference to some Backland Development causing problems is somewhat generalised and unqualified. In these circumstances it adds nothing to the document of any value. Delete sentence "However, some Backland Development can cause problems and will be refused planning permission".	Agree: Deleted

	<i>Obj. No.</i>	<i>Guidance Note</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Hannick Homes & Development Ltd	15	BI		<p>Extract from Swindon Design Guide 2006 Backland Development</p> <p>The last paragraph in the box is inconsistent with the general approach to good quality design advised in PPS1 paragraph 33 to 39 and specifically paragraph 38 - 'design policies should avoid unnecessary prescription', that 'Local Planning Authorities should not attempt to impose architectural styles or particular tastes' and that they 'should not stifle innovation, originality or initiative'. We consider that the whole document is contrary to the spirit of the design guidance in PPS1.</p> <p>Delete: The Borough Council will normally expect any infill and shape and proportions of buildings.</p>	<p>The document is designed to encourage good design and deliver sustainable development that meets the key principles and spirit of PPS1.</p>
Hannick Homes & Development Ltd	16	BI	1.6	<p>Appeal Decisions</p> <p>We consider it wholly inappropriate to quote inspector's appeal decisions in the manner suggested. All Inspectors' decisions are taken on the individual merits of the case as all sites are unique. We could quote a number of inspectors who have supported 'backland' development at The Broadway, Oxford Road and so on. You should be aware that the Planning Inspectorate's guidance note on this matter states that there are no prescribed standards for the protection of residential amenity. I have attached a copy of this and would draw your attention specifically to paragraphs 6, 9, 13, 15, 18, 19 and 22. Specifically you will note from the advice that there is no prescription on say 0.4ha or any other 'rule of thumb'.</p> <p>Delete paragraph 1.6 and all subsequent quotations from Inspector's decision letters.</p>	<p>Agree to use inspectors comments from appeals that have been allowed to provide a more balance approach, which will help set a benchmark as to what would be acceptable in a proposal.</p> <p>It is accepted that there are no perscribed standards for residential amenity or it can only be determined on a cases by case basis. However, there are certain criteria that assist in ensuring that residential amenity is protected. The SPD covers expectations of schemes that must meet there criteria or a minimum.</p>

	<i>Obj. No.</i>	<i>Guidance Note</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Hannick Homes & Development Ltd	17	BI	2.0	<p>General Requirements:</p> <p>The approach is inconsistent with the general approach to good quality design advised in PPS1 paragraph 33 to 39 and specifically paragraph 38 - 'design policies should avoid unnecessary prescription', that 'Local Planning Authorities should not attempt to impose architectural styles or particular tastes' and that they 'should not stifle innovation, originality or initiative'. We consider that the whole document is contrary to the spirit of the design guidance in PPS1.</p>	<p>The document is designed to encourage good design and deliver sustainable development that meets the key principles and spirit of PPS1. There is significant scope for innovation of design within the basic parameters of paras 2.1 -</p>
Hannick Homes & Development Ltd	18	BI	2.5	<p>Delete paragraphs 2.1 to 2.4</p> <p>Layout, Diagrams 1 and 2We consider that the approach is too prescriptive and not backed up by any conclusive evidence that the development depicted in diagram 2 is harmful.This type of development has been supported in the past for example at 180 – 182 Oxford Road, Swindon (application ref: S/04/2896 – Appeal, ref: APP/U3935/A/03/1174711).</p> <p>Delete paragraph 2.5 and diagrams 1 and 2.</p>	<p>Agree to some extent: Diagrams amended, but the emphasis that existing character should be retained as best practice I fundamental to securing acceptable development that are in character with their surroundings.</p>
Hannick Homes & Development Ltd	19	BI	2.11	<p>Garden Amenity: We consider that paragraphs 2.6 to 2.12 are unduly prescriptive. In particular 2.11 introduces the requirement for garden sizes to be at least that of the floor space of the house. We can find no Government advice to support this proposal. It can only be assumed therefore that it is simply a figure plucked from the air that would simply unduly constrain otherwise acceptable development without good cause</p> <p>Delete paragraph 2.11.</p>	<p>Agree: Minimum garden size is too prescriptive and lacks justification. Paragraph deleted.</p>

	<i>Obj. No.</i>	<i>Guidance Note</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Hannick Homes & Development Ltd	20	BI	2.12	Garden Amenity: We consider that shared amenity areas will always be appropriate for flats. We do not foresee any circumstances where shared gardens would be appropriate for houses.	No evidence has been put forward to suggest that it should always be suitable that apartments should always have shared amenity space. Such a requirement would be too prescriptive.
Hannick Homes & Development Ltd	21	BI	2.13	Amend first sentence to read "shared amenity areas will always be appropriate Amenity: We consider this paragraph to be wholly inappropriate. All proposals should be considered on their individual merits. A developments impact should be considered against all of its surroundings. There is no justification to single out occupiers of the existing or host dwelling in the way suggested.	Agree: Paragraph adds virtually nothing and has been deleted.
Hannick Homes & Development Ltd	22	BI	2.16	Delete paragraph 2.13. Amenity: The first sentence of paragraph 2.16 is entirely inappropriate. We do not consider that good neighbourliness and fairness are yardsticks against which proposals can be measured. They are simply unquantifiable and provide nothing useful to the document.	Agree to some extent: Sentence amended to more appropriate wording with quantifiable
Hannick Homes & Development Ltd	23	BI	2.21	Amenity: The references to the '45 degree code' are confusing. Is it a 'strict rule', 'rough guide' or a 'rule of thumb'? The second sentence refers to it as not 'a strict rule'. However in the following sentence it is applied as a strict rule. Nevertheless the use of the 45 degree code has been taken out of context as it generally applies to extensions to existing dwellings where by virtue of height and length there are situations where extensions would reduce natural light unacceptably to neighbouring dwellings in close proximity. Delete paragraph 2.21.	The principle of the 45 degree rule is already Council Policy in the House Extensions SPG. It equally applies to new dwellings and extensions and relates to new development as well as existing properties.

	<i>Obj. No.</i>	<i>Guidance Note</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Hannick Homes & Development Ltd	24	BI	2.23	<p>Privacy and Overlooking:</p> <p>We support the fact that sufficient separation between dwellings should be provided to avoid excessive overlooking. However, we can find no justification in Government advice that a site needs to be 0.4 ha before two storey development is acceptable. The Borough Council's use of separation distances is already in place to cover consideration of planning applications and consequently we question why this additional test is necessary.</p> <p>Paragraph 2.23 suggests that "It is unlikely that a satisfactory two storey development could be achieved on a site of less than 0.4ha /1 acre" We would dispute this assertion on a number of points. There are numerous examples in the Borough where 2 storey development has been satisfactorily accommodated on sites significantly less than 0.4ha. Infill sites are more than likely to be less than 0.4ha but more than capable of accommodating a two storey dwelling. At average density (30 dph) 0.4ha should provide some 12 dwellings. Overlooking distances are accepted and can be accommodated on plots of less than 0.4ha. The relationship between rear garden development and impact on amenity of dwellings say adjoining the rear gardens of their properties is more difficult. The Inspectorates guidance refers to impact on "private areas" but does not necessarily rule out development close to the rear garden of a neighbouring property. The SPD seems to simply replicate paragraph 4.3 in the Woking Guidance without much thought to specific site circumstances.</p> <p>This level of prescription is simply not acceptable or endorsed by any Government guidance. For example 180-182 Oxford Road, Swindon, which was granted on appeal for 7 dwellings is 0.17 ha.</p>	Agree: Minimum site size deleted.

	<i>Obj. No.</i>	<i>Guidance Note</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
				Delete the second sentence of paragraph 2.23.	
Hannick Homes & Development Ltd	25	BI	2.25	A kitchen is not a habitable room and there are many examples of both modern and older development where kitchens are in close proximity to each other.	Agree: Deleted as suggested
Hannick Homes & Development Ltd	26	BI	2.27 - 2.28	We consider that this paragraph would be more logically placed after the heading to paragraph 2.28. We consider that 21m is a more acceptable overlooking distance between facing windows of habitable rooms. This is the usual 'rule of thumb' adopted by the Borough Council.	Agree to some extent, paragraphs combined, now para 2.6. 22 metres is used within other SBC guidance (SPG Good Design House Extensions 2004) and in order to provide consistency 22 metres separation distance should be applied in this document.
				Combine paragraphs 2.27 and 2.28 and	
Hannick Homes & Development Ltd	27	BI	2.29	Access and Car Parking: We consider this paragraph in somewhat sweeping and generalised. Under what circumstances would noise, danger and visual amenity apply?	This section has been moved to make the document easier to read and more logical. The statement is retained as the issues raised are material considerations and can lead to a refusal of consent.
				Delete paragraph.	
Hannick Homes & Development Ltd	28	BI	2.36	We note the reference to Conservation Area Appraisals. It should be noted that the Conservation Area Appraisals have not always been supported by Appeal Inspectors. Notable decisions include Westlecott House, Westlecot Road and land adjacent The Ferns, Front Lane, Blunsdon. We consider that the paragraph places undue weight on the Conservation Area appraisals.	Paragraph amended but Conservation Area Appraisals are adopted SPG and therefore are a material planning consideration.
				Amend sentence to read "Any development proposal in a Conservation Area will be judged on its affect on the areas character and appearance".	

	<i>Obj. No.</i>	<i>Guidance Note</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Hannick Homes & Development Ltd	29	BI	3.8	<p>Infill Access: Supported</p> <p>We support in certain circumstances shared driveways which have advantages from highway safety point of view by limiting number of access points.3.8 Boundary Treatment:We consider this requirement to be unduly prescriptive and not supported by Government advice. We would suggest that different boundary treatments are typical of Swindon's streets. This adds variety to street frontages.</p> <p>Delete paragraph 3.8 and diagram 8.</p>	<p>This is important to create a consistant street scene. If an existing street is characterised by a range of boundary treatments, then this element of the guide would not be applicable as it relates specifically to frontages 'matching' the prevailing street scene.</p>
Hannick Homes & Development Ltd	30	BI	4.2	<p>Piecemeal Development:We consider that the provision of guidance for 'piecemeal development' is difficult given the differing nature of sites and land ownership patterns. We consider that where proposals meet acceptable standards to protect existing residential amenity and so on that permission should be granted.</p> <p>Delete paragraph 4.2.</p>	<p>This is a major problem of infill/backland development in Swindon and could prejudice the more appropriate delivery of a more comprehensive scheme that could serve to maximise development on previously developed land.</p>
Hannick Homes & Development Ltd	31	BI	4.3	<p>Tandem Development:</p> <p>We consider that where tandem development meets the overlooking distances and is otherwise acceptable it should be permitted. For example where a dwelling is situated behind an existing dwelling as depicted in diagram 9 then provided it is sited 22m distant then overlooking problems can be avoided. We do not consider that all tandem development would necessarily be harmful for all of the reasons stated in paragraph 4.3.</p> <p>Amend paragraph to be more permissible as suggested above.</p>	<p>Agree to some extent: Tandem development is now put in with backland as the principles are similar. However, it is more likely to give rise to adverse amenity impacts by its nature and unless it meets the criteria required for general backland development will be refused.</p>

	<i>Obj. No.</i>	<i>Guidance Note</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Hannick Homes & Development Ltd	32	BI	4.4	<p>We do not support the reference to 0.4 ha as the site size threshold.</p> <p>There are numerous examples in the Borough where 2 storey development has been satisfactorily accommodated on sites significantly less than 0.4ha. Infill sites are more than likely to be less than 0.4ha but more than capable of accommodating a two storey dwelling. At average density (30 dph) 0.4ha should provide some 12 dwellings.</p> <p>Overlooking distances are accepted and can be accommodated on plots of less than 0.4ha. The relationship between rear garden development and impact on amenity of dwellings say adjoining the rear gardens of their properties is more difficult. The Inspectorates guidance refers to impact on "private areas" but does not necessarily rule out development where new dwellings are sited close to the rear garden of a neighbouring property. One size does not fit all. The SPD seems to simply replicate paragraph 4.3 in the Woking Guidance without much thought to specific site circumstances.</p> <p>Equally there maybe circumstances where development of rear gardens is secured by the use of an access road that does not serve the host dwelling. We consider that this form of development where it meets acceptable levels of residential amenity should not be ruled out by the guidance.</p> <p>Amend paragraph 4.4 to read.</p> <p>"On sufficiently large plots where it is possible to achieve separation between dwellings to overcome these difficulties development will be permitted. Development will also need to ensure that the amenities of all surrounding dwellings, together with the original 'host' dwelling can be safeguarded".</p> <p>Delete diagram 10.</p>	<p>Agree: Reference for minimum site size now deleted. Diagram 10 is also deleted as it is confusing.</p>

	<i>Obj. No.</i>	<i>Guidance Note</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Hannick Homes & Development Ltd	33	BI	4.6	<p>We consider this paragraph to be somewhat sweeping and unjustified as to why such access can be problematic. It adds nothing of substance to the document and should be deleted.</p> <p>Delete paragraph 4.6.</p>	Agree Paragraph deleted
Hannick Homes & Development Ltd	34	BI	4.7	<p>We consider that the last sentence is somewhat sweeping and unjustified. In general terms we support dual access use but in some cases this may not be possible. In what circumstances would multiple access points be discouraged? If an additional access point is acceptable in terms of highway safety and Government advice in Manual for Streets we see no reason why it should not be permitted.</p> <p>Either justify why multiple access points will be discouraged or delete the last sentence of paragraph 4.7.</p>	Agree to some extent: Text amended to provide justification
Hannick Homes & Development Ltd	35	BI	4.9	<p>We consider that the word nuisance in the last sentence of the paragraph is inappropriate given that it is not readily measurable.</p> <p>We suggest that 'adverse impact' would be more appropriate and measurable in the planning context.</p> <p>Delete 'nuisance' and replace with 'adverse impact'.</p>	Agree: 'adverse impact' added and 'nuisance' deleted.

	<i>Obj. No.</i>	<i>Guidance Note</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Hannick Homes & Development Ltd	36	BI	Diagram 13	Diagram 13 We consider that diagram 13 is misleading. There is no scale provided to check whether adequate distances have been maintained. It would appear that the garden sizes are significantly over the floor space for the dwellings proposed suggesting that PP3 minimum density of 30dph is not met. Either amend Diagram 13 in light of the above or delete it.	Agree: Diagram replaced with something less complex and easier to understand.
Hannick Homes & Development Ltd	37	BI	checklists	Checklist for Applicants: We do not support the checklist as it seems to list only a number of points arising from the main document. Delete checklist.	This checklist serves a purpose of informing both developers and officers on the key points of best practice
Penhill Forum	1	BI	1.1	Questioning the use of the word Imposed.	Agree: Imposed now changed to located
Penhill Forum	2	BI	1.3	Engage local areas in community consultation by referring through the local plan, especially in Neighbourhood renewal areas and hard to reach citizens.	Agree: Comments added to reflect this. Para 1.3.
Penhill Forum	3	BI		Decisions should be reached before appeal stage, Renewal Areas have less affluent people, community groups and representatives, so the Council over running these people would be of detriment.	This objection is not directly relevant for the purposes of this document
Penhill Forum	4	BI	2.6	Garden Amenity: In areas of renewal, gardens, green spaces and backlands - if properly utilised and cleaned are of utmost importance. Children and those less able can access these open spaces easily. It should be remembered that leisure time is more likely to be taken at home and the immediate environs.	Although the principle is agreed with it is not directly relevant to the context or purpose of this document.
Penhill Forum	5	BI	2.9	Endorse comments that these areas are important for wildlife, Including a recommendation of English natures to enhance these areas for communities.	Although the principle is agreed with it is not directly relevant to the context or purpose of this document.

	<i>Obj. No.</i>	<i>Guidance Note</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Penhill Forum	6	BI	2.10 - 2.11	It should be remembered that encouraging people to compost, gardens may need to be larger.	Not directly relevant for the purposes of this document, a refusal of planning consent could not be sustained on these grounds.
Penhill Forum	7	BI	2.16	'Community at large' should be added, in Renewal areas where groups are encouraged to writing community plans, volunteers and workers will need to know what is in the minds of planners as they could be working against each other. Community groups should be included at the partnership stage not when building, management and architects	Agree to some extent: It is difficult to include the terms 'Community Planning at Large' but Community involvement is covered elsewhere in the document
Penhill Forum	8	BI	2.38	It is not enough to write about trees and hedges in policy. In reality much damage is done when there is no enforcement to follow. Communities can be encouraged, acting in partnership, to 'police' any site chosen for	Agree: But this is not directly relevant to the purpose of this document
South Marston Parish Council	1	BI		Clear concise document that would put a stop to unacceptable site cramming and access/overlooking problems.	Agree to some extent: Amendments made to provide an even clearer document
Swindon Civic Trust	1	BI	1.0	The issue of sustainability is not mentioned. A proposed change could be that attention should be drawn to compliance with 'Swindon Sustainable Design and Construction SPD'.	The principles are of good design and best practice, which in some way go towards sustainability. Sustainable Design and Construction is covered by another SPD that does not necessarily require cross reference.
Swindon Civic Trust	2	BI	2.9	The bottoms of long gardens (as in many of Swindon's terraces) provide a habitat for wild life and a green corridor for their travel. Developing the bottom of just one garden in such an area could well disrupt the whole corridor. - Proposed change, the above point needs to be made within Clause 2.9	Agree: Comments added to document para 2.9

	<i>Obj. No.</i>	<i>Guidance Note</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Swindon Civic Trust	3	BI	2.13	<p>The clauses do not take into account that not only does the backland development reduce garden space; it also puts an additional load on Public Open Space.</p> <p>- Proposed Change -</p> <p>That irrespective of the size of the development the impact on existing public space and children's play areas should be assessed and where necessary additional land and facilities be provided under a 106 provision.</p>	<p>Agree: Comments added to para 2.14 emphasise that a strain on POS can occur. Requesting S.106 Contributions for POS from any development irrespective of the size is not in accordance with Swindon Borough Developer Contributions Guidance Note (2006).</p>
Swindon Civic Trust	4	BI	2.21	<p>The sentence re the mid point and quarter point is not clear.</p> <p>On page 1 'Outlook' is defined, but this not picked up in the clause.</p> <p>Proposed change - Mid point and quarter point to be illustrated with a diagram</p> <p>Further guidance needed on 'Outlook' and the requirement for protection from the oppressive effect that buildings of overbearing appearance. As this can be a subjective matter, some clarity on how this should be evaluated is required.</p>	<p>Agree to some extent: Revised diagram included</p>
Swindon Civic Trust	5	BI	2.0	<p>- No guidance for mixed use development only homogenous residential situations.</p> <p>- Proposed change - Worked examples showing flat and terrace development in both mixed development areas and homogenous residential areas, showing how mitigation can be applied to maintain the amenity of existing neighbours.</p> <p>- It maybe that flat development should be resisted in the majority of cases; If so this should be clearly stated as a</p>	<p>Agree to some extent: Comment Agree to some extent: However most problems caused by backland and infill development has an adverse on residential properties as opposed to business premises.</p>

	<i>Obj. No.</i>	<i>Guidance Note</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Swindon Police	1	BI	1	Concerned with designing out crime. Recommend a new paragraph titled 'Sustainable Homes - Secured by Design' to secure standards of designing out crime which are supported the Home Office, Insurers and Police. - Local Planning Authority should consult with the Local Police Architectural Liaison Officer on all Major Planning Development Applications with regard to implementing 'Secured by Design' for sustainable Development and Safer Communities.	Agree: Added at para 2.36
Thames Water	1	BI		Should be a reference to "Infrastructure and Utilities" and should make reference that 'Thames Water will need to be consulted on particular types of development'.	Agree: Text Added at Para 3.6
The Theatres Trust	1	BI		No comments to make apart from supporting the general requirements at 2.1, 2.2 and 2.3.	Noted
Wroughton Parish Council	1	BI		In favour of minimising loss of greenfield land, but this will add to the loss of gardens with thousands already being turned into car parking spaces. It does not allow rain to drain away leading to flooding.	Para 2.11 added to mention that impermeable surfaces should be avoided.
Wroughton Parish Council	2	BI	3.7	Building houses on employment land is not necessarily sustainable as employment site move to greenfield	Agree: However, this is not directly relevant for the purposes of this guidance - Employment land is protected in the Swindon Borough Local Plan
Mr. A Read	1	BI	2.29	Support the principle of the document - addresses many concerns about the scale and nature of infill development.	Noted
Mr. A Read	2	BI	2.29	Like to add a comment concerning pedestrian safety on the existing footway where the new access is built. Too often sightlines are restricted for both pedestrian and for the driver crossing the footway from the new development. I would like to see an explicit reference to this being considered, coupled with road markings so that drivers clearly have to 'give	Agree to some extent: Any new development should reflect guidance in the Manual for Streets (2007), which is referred to in para 5.7