

**Swindon Central Area Action Plan  
Submission Paper  
Regulation 31 Statement  
March 2008**

***Summary of the Main Issues Raised in the Representations to the  
Swindon Central Area Action Plan Submission Paper***

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## **Annex**

**The Complete Set of Representations to the Swindon Central Area Action Plan Submission Paper (bound separately)**

## **Introduction**

This Statement sets out the representations received by Swindon Borough Council to the Swindon Central Area Action Plan Submission Paper. It is prepared under Regulation 31(2) of the Town and Country Planning (Local Development) (England) Regulations 2004, which requires that as soon as reasonably practicable after completion of the consultation period, a Local Planning Authority must send to the Secretary of State:

1. A statement of the total number of representations made;
2. Copies of the representations;
3. A summary of the main issues raised in the representations; or
4. A statement that no representations have been made.

## **Consultation undertaken under Regulation 28**

The Central Area Action Plan Submission Paper was submitted to the Secretary of State on 31 December 2007. The Council undertook formal consultation on the Submission Paper from 31 December 2007 to 25 February 2008.

The consultation was carried out in accordance with Regulation 28 of the Town and Country Planning (Local Development) (England) Regulations and as specified in the Statement of Community Involvement.

This formal consultation gave rise to 430 representations from 55 parties. Appendix 1 lists the parties that made representations on the Submission Paper and Appendix 2 provides a summary of the representations made. Copies of the original representations comprise an annex to this Statement.

Six respondents expressed a wish to appear and present their case at a public examination. (Where the respondents did not indicate a preference for their representation to be considered by written representation or to appear at the Examination, the Council has assumed that the respondent does not wish to appear at the Examination).

The six bodies / individuals who wished to appear at the Public Examination are:

- 108 Swindon Civic Trust
- 314 Drivers Jonas on behalf of Resolution Asset Management
- 336 Mr BV Cockbill
- 337 The New Mechanics Institution Preservation Trust Ltd
- 348 Ros Timlin
- 350 Front Garden Action Group + Old Town Group

The Council will make the representations available at the same locations as the Central Area Action plan was officially available for inspection.

The representations received have been scanned and will be made available to view electronically on the Council's website at [www.swindon.gov.uk/centralareaactionplan](http://www.swindon.gov.uk/centralareaactionplan)

In relation to the Soundness Tests, where a test was not specified by the respondent, the Council assigned the Soundness Test it considered most appropriate to that representation.

## **Breakdown of Comments Made**

### **General**

Comments included complements on the standard of the Central Area Action Plan (CAAP). There was broad support for its content, which was generally considered to be soundly based.

The vision and objectives of the CAAP were generally supported.

There was support for the aspiration for Swindon's development to be sustainable. However there were comments that the CAAP should do more to address climate and that the CAAP should be future-proofed by anticipating the implications of the climate-change bill and embedding a zero/low-carbon approach in all elements of the development.

There was criticism at the inconsistencies with the definition of the central area throughout the Plan.

There was an objection that the CAAP should not be considered by the Examination in Public without further refinement and an additional round of consultation. This objector also criticised the overall consultation approach to the CAAP.

There was criticism at the perceived late introduction of the canal via the town centre and 'rigging' of the boundary to benefit Old Town, but not Rodbourne Rd and Gorse Hill.

There was support for the fact that the CAAP reflects the projects identified in the Regeneration Framework and the objectives of the New Swindon Company URC.

The South West Regional Assembly noted that the Plan was in general conformity with the draft Regional Spatial Strategy for the South West.

There were concerns that Developer Contributions form a significant part of the delivery plan for many of the schemes and innovations planned. It was suggested that the Council needs to have a clear idea as to how this will work and where the priorities are, and how each priority contributes to the wider overall objective of regenerating the town centre.

It was suggested that the Plan could explain more clearly what new business development is proposed and how this fits within the context of an economic strategy or other evidence to demonstrate the realism of what you propose and most appropriate options to pursue.

### **Section 1: Introduction**

There was a welcome for the objectives to co-ordinate and deliver high quality and accessible services and facilities that are needed to support the communities living in or adjacent to Central Swindon. There was also a welcome for the aspirations to provide wider opportunities for Central Swindon living and the creation of safe, convenient, user-friendly and attractive routes into, out of and through Central Swindon to help develop a vibrant and active community.

There was an objection that Objective 1, central Swindon should be 'the' destination of choice, rather than 'a' destination of choice.

Some respondents wanted to see a more specific reference within the objectives to the importance of improving the accessibility of the town centre by alternative modes of transport other than the private car, including bus, train, cycle and pedestrians.

### **Section 2: Development Strategy**

One respondent suggested that the Plan should be more robust in its aspirations, perhaps by setting targets to deliver a reduction of carbon emissions.

There was a welcome for the commitment to building design 'that dramatically reduces its carbon footprint & generates a proportion of its own energy requirements' within the CAAP Sustainability Principle. However transport must also be a key plank of this Principle.

There was an objection that Transport is absent from the key Sustainability Principle. It was suggested that the Transport and Movement Principle needs to be replaced by a principle to 'deliver a modal shift to sustainable travel modes'.

There was a suggestion that the CAAP strategy should do more to capitalise on the economic opportunities that exist for communities that play a leading role in the transition to a low-carbon economy, for example, by developing the North Star Industrial and Educational areas to be national centres for 'green' innovation.

An objector noted that whilst there is mention of "dramatically improved linkages", particularly between the Town Centre, Old Town and Outlet Centre, it is difficult to see how this can be achieved given the narrow roads, built up areas, and the railway line barrier.

### **Section 3: Design Strategy**

There was support for the principles within the design strategy and agreement with the Council that good design has an important role to play in raising the profile of Swindon, creating and reinforcing a distinct local identity and sense of place and attracting inward investment.

There was general support for the general principles contained in Policy 1 and the commitment to a high quality of design.

One objector stated that Policy 1 should also include design criteria covering the inclusion of facilities for non-car travel modes such as cycle storage.

One objector stated that the Town Centre section mention of residential uses needs reinforcing. As well as “gateways” in the Town Centre para, there should also be feature gateways on all main routes into Swindon.

One objector suggested that the Design Principles Section should include a requirement to include residential use above all offices and shops etc to help with security and ensuring areas do not become ‘dead’ at night.

One respondent stated that there should also be provision when building houses, for ground floor or underground parking.

It was noted that redevelopment of the central area needs to deliver a mix of land uses and should be at a high density in order to reflect the guidance within PPS1 and PPS3. This will ensure that the town centre becomes vibrant and sustainable for the longer term.

There was support for the establishment of the Swindon Design Review Panel.

There was a suggestion that the design strategy should acknowledge the need for creativity in the approach to street design, public realm and architecture. Creativity should contribute to a unique sense of place and identity.

In relation to Tall Buildings it was suggested that there would be greater certainty and clarity if the plan identified where tall buildings might be developed and the form such development should take. One respondee noted that there should be a tall building at the university.

There was an objection in relation to where the text refers to the fact that the applicant should ensure that they are applying an ‘exceptionally high quality design’ to tall buildings. The objector noted that this was an ambiguous term.

#### **Section 4: Sustainability Strategy**

There was broad support for Policy 2 – “Sustainable Construction”.

There was some criticism that the sustainability strategy does not address modal shift. Transport should be included as a key plank of the Sustainability Strategy.

It was suggested that the contents of this policy represent an unnecessary duplication with the contents of the adopted Sustainable Building Design and Construction SPD.

There were suggestions that flexibility should be built into the Policy and that the Council should take a pragmatic and realistic view as to what is achievable (and commercially viable) on individual sites.

There was general support for the approach to green roofs. One respondent asked that green facades and complementary gardens at ground level be included in proposals to better provide for connectivity of habitats.

One respondent questioned the management and maintenance of green roofs and notes that there was scepticism amongst developers and a lack of financial incentives to pursue green roofs.

Under Sustainable Water Management one respondent suggested that all development proposals should be considered, not only those more than 1 ha. There was criticism that the sustainable water management section relates mainly to flooding and makes little mention of water and sewerage infrastructure. The Plan should make reference to the provision of adequate water and sewerage infrastructure to service development to avoid unacceptable impacts.

There was an objection to the approach whereby development should demonstrate that surface water run-off will be no worse than before the development is an unrealistically high target. It was concluded that the test should relate to whether surface run-off results in an unacceptable impact.

It was further noted that on site mitigation of surface run-off may not always be practical especially in an urban area where high-density developments will be common.

There was support for the proposal to develop a decentralised sustainable energy supply scheme. However there was a concern at the prospect of its rigid implementation.

It was suggested that information on how waste 're-use' will be maximised should be included.

### **Section 5: Public Realm**

There was support for the proposals to improve the pedestrian and cyclist experience in Central Swindon.

One respondent suggested that the objectives should include an objective to reduce car domination of the public realm, through reducing congestion and unregulated parking consistent with the Council's aspiration to ensure that 'the car does not dominate...the environment'.

One respondent suggested that the CAAP could do more to emphasize the health benefits the green spine would bring to Swindon and links to PCT/Active Swindon initiatives.

There was general support the Green Spine and Spaces sections.

It was suggested that the Green Spine should continue to at least Springfield Road, or even to the new Croft Road roundabout as this is a major route from Devizes / Wroughton to Swindon.

Another respondee suggested that the Green Spine is extended approx. 100m further along Devizes Road to the Old Town Railway Path.

There was a suggestion that it is not clear which sections of the Green Spine, if any, will have motorised traffic.

There was welcome for the ideas of improving the link between Old and New town.

There were objections to the full pedestrianisation of Wood St.

It was noted that whilst improvements to the Victoria Road “link road” are needed, this is going to be difficult given existing constraints in the area. There was support for the public realm proposals under ‘Primary Routes in Central Swindon’ that facilitate enhanced pedestrian and cyclist experiences as well as reducing on-street parking as at Wood Street. These measures will encourage shifts to non-car travel.

It was noted by one respondee that Fleet Street is a major route in central Swindon with very significant issues, a major cycle parking node and a junction with Bridge Street, but it is not mentioned at all in the list of public realm improvements.

It was suggested that there should be greater focus on public art in the Plan.

It was suggested that when describing individual parks, the potential for biodiversity enhancement should be mentioned.

It was noted that as Manchester Road is a Major Local Centre, with many pedestrians using it, it should be protected from becoming more widely used as a through route for traffic. Greater traffic use would not only make the road dangerous for pedestrians but will also split the Broadgreen Area into 2 halves. It was also noted that the Broadgreen Area should be protected from additional traffic using the area as a ‘rat run’.

There was welcome for the identification of the Railway Station and Bus Exchange as important gateways, the central location of the bus exchange in the town centre will encourage greater bus use. There was a comment that it is not clear in the document how the ‘Gateway at Kingshill’ will serve vehicular traffic from the West. A clear statement of intent is required.

It was commented that the lighting strategy should consider impact on CO<sub>2</sub> emissions and light pollution.

There was an objection to the rebranding of The Parade as 'The Garden'.

### **Section 5: The Canal**

The proposed reinstatement of the canal through Central Swindon proved highly divisive.

There were a number of supports for the canal proposals. One respondent noted that the canal would give Swindon a "wow" factor and would help reduce traffic problems along Westcott Place.

One supporter noted that the canal would change the character of Westcott Place from vehicular access to waterway with parallel pedestrian and cycle route, thus promoting sustainable travel options.

One supporter stated that the canal would be good for area and will bring tourists.

It was suggested that the canal will also deliver new routes to walk and cycle for those who live and work nearby and employment for those employed in canal-based industries.

Reasons for objection to the route of the proposed Canal included:

- Not enough benefits over high cost of Canal.
- Quality would be compromised because of costs.
- Not on existing route making fund raising difficult.
- The canal could create congestion and delays borough-wide, with access to the Town Centre becoming more difficult.
- Impact on traffic will affect the viability of retail areas.
- Timescale will affect the re-building of the town centre.
- Congestion issues on the Great Western Way, around Railway Village area and through Old Town, Crombey Street.
- Unresolved transport issues
- Lack of space for highways and pathways.
- Severance of North and South routes, access from West depleted.
- Requires large scale maintainance
- Access issues for Car Parks, existing transport links and properties en route.
- Uncertain costs.
- Ownership Issues.
- Lack of support from residents and inadequate consideration for their needs and concerns and monetary investment in these areas.
- Proposed route through flood plain increasing flood risk due to climate change.
- Danger of waterborne pollution.
- Environmental concerns, including leptospirosis and other water borne diseases
- Possible damage to Victorian foundations.

- Adverse effects to World Heritage application, Railway Village, and conservation area.
- Divert attention from Railway Village and Mechanics Institute maintenance and improvements.
- Not enough attention to the years of neglect for central Swindon.
- Budget and timeframe concerns.
- Project too expensive and intrusive.
- Major disruption to traffic and utilities (gas, electric, water, sewerage, telephone) and compensation issues.
- Vibration damage to Victorian house foundations during canal construction.
- The carbon footprint of the area will be increased.

There was concern that the canal proposals could impair the delivery of regeneration. It was suggested that the canal may not be sufficiently progressed to be a proposal capable of being delivered in the plan period.

It was suggested that the policy could be clearer about how new development is expected to ‘positively respond to the canal in its design’ – especially if development takes place before the canal’s construction.

It was suggested that the Canal policy should describe the scale and engineering of proposals for a canal basin and identify a specific area of search on the proposals map for the basin.

### **Section 6: Transport and Movement Strategy**

It was noted that the thrust of the transport elements of the plan seem in-line with government policy.

It was commented that the plan does not articulate an overall strategy for transport and establish how redevelopment proposals integrate with transport planning for the central area, the rest of Swindon and the wider catchment.

One resposdee considered that the plan would benefit from a better explanation of how and when the various ideas for improvement fit with transport strategy, how they will be delivered and more particularly the plan’s priorities.

It was suggested that given the negative impact of car-travel on many other targets of the CAAP, the current strategy to facilitate improvements to all travel modes should be replaced by a strategy to deliver a modal shift to sustainable transport modes.

There was widespread welcome for the plans to improve pedestrian and cycle provisions.

It was suggested that the current Transport and Movement Principle to “facilitate improvements to all travel modes” need to be replaced by a principle to ‘deliver a modal shift to sustainable travel.

One respondent commented that the provisions to mitigate effects of the development on the wider town centre transport network are weak. They focus on 'managing' traffic but should instead aim to reduce the amount of traffic overall.

A number of respondents wanted to see more in the CAAP to increase levels of walking and cycling by creating an excellent walking/cycling infrastructure along with sufficient revenue resources for staff and programmes that will encourage people to walk or cycle.

It was suggested that the "unrestrained use of the car" is to be tackled the following drastic measures should be considered Prohibit cars with only a driver from entering the town centre unless they have a special priority, ban all cars from the town centre, a congestion charge, "Travelsmart" or sharing schemes.

One respondent considered that Policies 5 and 6 did not add value to the Plan and should therefore be removed.

There was general support for the plans for a high quality and well-located bus exchange. Every effort must be made for a building that is user-friendly and welcoming.

One respondent stated that the plan should safeguard a specific area for the bus exchange.

There was support for the proposed consolidation of car parks in the town centre

There were a number of objections to the proposed increase in car parking provision, which would not deliver modal shift towards public transport.

It was recommended that the Council takes the opportunity to seek substantial government funding that is available for sustainable transport initiatives. E.g. Cycle Demonstration Town Bid, or Transport Innovation Fund Bid.

It was commented that there should be reference to what will happen to traffic as a consequence of the canal going through Faringdon Road or the Green Spine.

There was a concern raised that cycle and pedestrian lanes should be segregated.

### **Section 7: Swindon Town Centre**

There was support the aim of enhancing the retail offer of the town.

One respondent considered that the importance of secondary shopping is not adequately recognised.

It was suggested that Policies 12 and 13 do not offer sufficient allowance for Class A2 uses. It was noted that A2 still creates active shop frontages at ground level, as such policy should be modified to accommodate such uses and create a more balanced range.

There were concerns that the policies should offer sufficient flexibility to enable the retail schemes at Sites B and C to come forward.

There was concern at the impact of the canal and canal basin on redevelopment schemes in the vicinity.

There was support for The Promenade. It was commented that the policy for a new cultural quarter contains all the elements required for a thoughtful and forward looking framework for the future cultural needs of the Borough.

However, one respondent suggested that the cultural offer proposals for the Cultural Quarter offer little or nothing for the practical aspects of the work that goes into the development of artistic achievement.

One respondent noted that if the new civic office campus is to be big enough to incorporate the offices at Premier House and Sanford Street, it will be a dominant feature of the Promenade, reducing the space for cultural & leisure uses & creating a parking problem.

There was support for the Union Square proposals.

There were concerns raised that the new Swindon PCT Walk-in Centre should be accommodated at a safe and accessible location.

A respondent stated that Network Rail land next to the railway should be safeguarded for rail freight or a rail related use.

## **Section 8: North Star**

The allocation of North Star for a university campus was widely welcomed.

It was commented that the university would help regenerate the town centre, and bring much needed attention to Swindon.

One respondent recommended that a tall landmark building should provide a central focus on the site, and that the university should be self-contained for energy production. It should also have close links to the Science Museum.

It was suggested that the 3 year review period for the university campus does not provide sufficient flexibility to permit sufficient progress in securing a Higher Education presence at North Star.

It was suggested that the Policy for Hawksworth Industrial Estate should offer greater flexibility of uses beyond just Class B uses.

### **Section 9: The Railway Heritage Area**

One respondent commented that the route from the Outlet Village, past the Mechanics Institute to the town centre, offers an opportunity for an imaginative modern means of movement such as a travelator or elevated walkway.

Clarification as to what is meant by 'contemporary building design' was requested.

It was suggested that the former Great Western Railway Health Centre and Baths should be included within the boundaries of the Railway Heritage Area.

It was suggested that the New Mechanics Institute future should be given more consideration.

It was commented that the introduction of a bus priority route along Oxford Street needs re-evaluation.

### **Section 10: Central Swindon's Residential Communities**

The Action Plan's approach to delivering improvements to existing communities adjoining the Town Centre was welcomed.

It was suggested that some of the boundaries to the area covered by the Action Plan seem quite arbitrary, particularly to the west and south where they run down the centre of roads (and in Even Swindon, through the centre of the community) where the properties on either side are of similar character.

There was an objection to the fact that there is no policy regarding houses in multiple occupancy.

It was commented that if new residents in Central Swindon are not given parking permits it is essential that each new development has integral parking spaces.

It was suggested that until the Action Plan gives more detail it is difficult for the public to have any confidence in the Plan. How can you "empower" communities to "identify and prioritise" improvements?

It was commented that the Green spine does not address the need for open space for central communities as, with major roads running within much of its length, it will not supply the type of recreational green space with which it is being compared.

There was an objection to the failure to estimate a sufficient number of school places in line with the residential provision for the Central area. Acknowledged that a lack of capacity exists, however at least one new Primary school site needs to be identified.

One respondent asked that the references to the area as 'Broad Street' be altered to Broadgreen? Broadgreen is the name the area is generally referred to now.

There was concern that with the proposals for the canal and Flemming Way there will be an increase in traffic through a residential area increasing dangers in the area and adding to pollution.

The limitations on the extent and nature of retail offer allowed at the Manchester Road Local Centre were supported. However there was concern that the limitations do not go far enough. Concerns were raised at the level of illegal parking outside of existing retail units.

One respondent noted that the Manchester Road offer is a niche offer and currently at a local small scale and that it should not be seen as a destination for shopping beyond the local need it meets presently.

### **Section 11: The Old Town Area**

There was concern that full pedestrianisation of Wood Street would damage the vitality of the retail outlets in the street.

There was an objection to the fact Old Town is included in the Central Area. The Objector suggested that it should have its own Action Plan, tailored to its needs, as should the other outliers at Rodbourne and Gorse Hill.

### **Implementation Plan**

One respondent suggested that the thresholds for affordable houses should be lower.

It was suggested that the Canal Feasibility Study should be made available to the public and a special exhibition should be held as soon as possible to help convince the public of the viability and benefits, and help avoid the "blight" which may hinder progress.

It was commented that the imminent move of the Old Town Surgery to Okus Road, and the extra 878 dwellings there by 2009, will affect the figures shown.

It was noted that Lottery Funding should not be relied on in delivering regeneration.

### **Proposals Map**

It was commented that the plan contains a number of named sites which are referred to in different ways (as site a,b,c, etc as sites D1,D2 on the proposals map and they then also often have individual policies making a third set of numbering). It would be much simpler if the plan used one reference form for its set of sites and proposals.

## Appendix 1: List of Parties that made Representations to the Swindon Central Area Action Plan Submission Paper

<i>Ref No</i>	<i>Individual</i>	<i>Body/Organisation</i>
4		Highways Agency
16		CPRE
17		Thames Water Property Services
24		Old Town Group
27		South West Regional Development Agency
34		Environment Agency
38		Wiltshire Wildlife Trust Ltd
51		Wroughton Parish Council
72		British Waterways
80		GOSW
88		Gloucestershire County Council
89		South East of England Regional Assembly
92		The Ramblers Association North-East Wiltshire Group
94		The Theatres Trust
97		David Wilson Homes

104		The New Swindon Company
108		Swindon Civic Trust
129	NS Wise	
158		Network Rail
166		Swindon Climate Change Action Network
192	Keith Brain	
211		Muse (Amec) Developments Ltd
241		Active Swindon
248		LPC Trull Ltd
252		South West Regional Assembly
265	Allan Webb	
270	RK Hayden	
289	Mrs C Spickernell	
293		Broad Street Area Community Council
299	Mrs RA Phillips	
314		Resolution Asset Management
319		Swindon Friends of the Earth and Jefferies Land Conservation Trust
324		Costco Wholesale UK Ltd
333		Old Town Business & Professional Association

334		Red Planet Bikes
335	Martha Parry	
336	Mr B V Cockbill	
337		New Mechanics Institution Preservation Trust Ltd
338		Swindon NHS Primary Care Trust
339		Swindon Bug
340	Sue Wood	
341	Susan Horrocks	
342	Mr D Wharf	
343	Mr M A Talukaloer	
344	Jason Lee	
345	Celia Cooper	
346	Mr RJ Wise	
347	Mrs A Obee	
348	Roslyn Timlin	
349		Nationwide Building Society
350		Front Garden Action Group and Old Town Group
351		Pipers Area Residents Committee
352		Prudential Property Investment Managers Ltd

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Ms J Tucker

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SEEDA

## Appendix 2: A Summary of Representations Made to the Swindon Central Area Action plan Submission Paper and Officer Responses

<i>Respondent Ref</i>	<i>Rep Nos.</i>	<i>Chapter codes</i>	<i>Representation Summary</i>	<i>Suggested Actions</i>	<i>Representation Response</i>
80	6		The plan does not approximate the mix and type of housing that the area will deliver over the plan period and how this takes forward the local housing strategy, is realistic and based upon such evidence as a housing market assessment.		This is provided within the Implementation Plan and is based on the Swindon Housing Market Assessment.
24	43		The probable effects on housing availability for staff and students in the town centre and wider area should be assessed and linked with housing development plans.		The student and staff housing needs will be informed by the form and scale of the university. The Plan commits the University to delivering student accommodation on site within a campus style development.
252	3		Believe that the AAP is in general conformity with RPG10 Policy VIS2 as it seeks to re-develop the existing central area by promoting a mix of land uses, which also complies with RPG10 Policy SS11. The AAP is in line with draft RSS Policy SR9, as key sites in the Swindon Central Area will be		Noted
252	7		Refer you to Development Policy F and Policy H2 in the draft RSS requiring residential development at the SSCT's to be at least 50 dwellings per hectare or higher.		Noted
252	9		Welcome that with major new residential development that 30% of dwellings will have to be affordable which accords with draft RSS Policy H1.		Support noted
337	1		Trust objects to the proceeding of the	Representation made on behalf of the	Old town has a functional link with the

		CAAP document to Public Enquiry without further refinement and an additional round of consultation. Many aspects to which objection is made and the document as a whole needs to be re-considered before EiP.	New Mechanics Trust, and the Swindon Civic Trust needed early consideration by the Regional Planning Authority. Consideration of a further period of revision before EiP. HMOs policy needs to be addressed to include neighbourhoods on town centre fringe boundaries. Boundary of the Central Area needs to be expanded to include Rodbourne and Gorse Hill.	town centre. Gorse Hill and Rodbourne provide very self contained high streets that serve their adjacent populations. The document has been subject to three rounds of consultation with additional pre production consultation.
337	2	Attempt by the Trust to participate in planning process since 1995. Failure by SBC to accommodate the Trust's involvement in the Community Strategy (both versions), New Swindon Company and the Council and the LSP.		The Council has sought to fully engage the Trust in the preparation of the CAAP. Officers have made themselves available to meet with members of the Trust and have offered to run consultation events with the Trust.
337	3	SCI should not be relied upon due to its preparation independent of public input and its superficial approval by the Planning Community Forum.		The adopted SCI has been through an EIP and 3 rounds of public consultation.
337	4	Sustainability Appraisal not undertaken in a manner which warrants reliance upon the plan.		Sustainability Appraisal has been undertaken in line with Regulations.
80	16	Support progress made with this Plan, it demonstrates a firm commitment to the comprehensive transformation of the central area, to tackling climate change and gives clear area based proposals that will guide progress.		Support noted
314	12	We seek to remain involved in the CAAP preparation process and to be given the opportunity to provide additional comments should any further consultation be undertaken. We would welcome the opportunity to appear at Examination to explain our comments further.		Noted
80	14	The plan should clarify with a schedule exactly what policies and proposals of		This is provided within the Technical Appendices document

		the Local Plan the submission document intends to replace. The changes to the development plan area not immediately clear.		
314	11	Wishes to ensure that the document does not focus too heavily on details of aspirational developments potentially coming forward to the detriment of shorter term proposals. The CAAP should take a pragmatic approach to supporting regenerating town centre developments which are deliverable in the short to medium term, where funding is available. This will ensure that the CAAP is sufficiently flexible to deal with changing circumstances		Noted. The Council is taking a pragmatic approach to allocated resources to regeneration projects, based on deliverability as well as their regenerative benefits. This is borne out in the successful delivery of the Wharf Green Public Realm improvements financed through monies secured through Growth Points Funding.
90	4	It would be useful for the plan to provide estimates of total amounts of retail, commercial and residential development that the plan expects to be delivered in order to give an idea of the scale and rate of change anticipated	This monitoring framework should be clearly linked to targets in your Annual Monitoring Report.	This is provided in the Implementation Plan.
80	3	The Plan seems justified on the basis that the strategic context has been clarified on pages 5-6 & that the implementation plan deals with development expected to take place before 2016, the period of the adopted Structure Plan.		Noted
80	2	Support the Area Action Plan progressing in advance of the Core Strategy as the most appropriate means to provide a sound basis for successfully co-ordinating and guiding the redevelopment of key town centre		Noted
80	1	Plan appears to be soundly based, and provides a level of detail that establishes the key features of the redevelopment projects proposed (at		Noted.

		least for the proposals to come forward during the early part of the plan period).	
38	5	Pleased with the standard of the documents and support its content.	Support noted
24	48	The figure of 3,000 new homes between 2006 and 2016 does not agree with the figures on Pages 2 and 3 of the Implementation Plan.	The 3,000 is a rounding down of the figure provided for allocations over the period to 2016 (1946) + the figure for dwellings completed since 2006 (501) + the figure for dwellings already committed but not yet built (646) - total = 3093
24	47	Under Section 11 of the Implementation Plan add "and cyclists".	The Inspector may wish to recommend that this principle be amended
24	46	The figure of £1.875m quoted in the Implementation Plan does not appear to include several legal agreements which have already be signed eg Wichelstowe etc.	The figure represents the monies secured through the Developer Contributions Guidance Note, which was published after the Wichelstowe development contributions were secured.
24	45	2 more headings should be added to the Barriers to Delivery Section of the Implementation Plan, ie Railway Village and Mechanics Institute.	These are not considered to be barriers to delivery of the proposals in the Plan.
24	44	The imminent move of the Old Town Surgery to Okus Road, and the extra 878 dwellings there by 2009, will affect the figures shown.	Noted and agreed. The Planning Department is working closely with the PCT to ensure that GP surgery needs in Central Swindon are met.
80	15	The plan contains a number of named sites which are referred to in different ways (as site a,b,c, etc as sites D1,D2 on the proposals map and they then also often have individual policies making a third set of numbering).	It would be much simpler if the plan used one reference form for its set of sites and proposals. At present the plan can be difficult to follow. The Inspector may wish to consider making a recommendation that site references in the Proposals Map should be aligned with site references in the Plan
166	1	Assuming that the proposed scale of Swindon's growth is out of the Council's hands due to Swindon's designation as a growth point town, we welcome the Council's stated aspiration for Swindon's development to be	Noted

289	13	Thresholds for affordable houses should be lower.	The thresholds have been identified following a detailed Housing Needs Assessment. They represent a balance between deliverability and the need to meet the Borough's affordable housing needs.
289	12	Sewerage - How can part payment work? Surely it needs major work.	Thames Water will be consulted on all applications where sewer flooding occurs. Thames Water will advise on what remedial measures will be required from each development proposal.
289	11	There appears to be no mention of rail crossings in the implementation scheme or of bus schemes.	Railway crossings and bus schemes are referred to at Page 27 of the Implementation Plan.
27	1	Supportive of the content of the AAP. The document reflects the projects identified in the Regeneration Framework and the objectives of the New Swindon Company URC. It will be important that this document is considered within the context of the preparation of the developer contributions strategy and growth proposals for Swindon, to ensure delivery and complementary development.	Noted.
89	1	No comments relating to this document and confirm that we have not suffered any prejudice as a result of the lack of earlier consultation.	Noted
211	5	Redevelopment of the central area needs to deliver a mix of land uses and should be at a high density in order to reflect the guidance within PPS1 and PPS3. This will ensure that the town centre becomes vibrant and sustainable for the longer term.	Noted
341	1	Fully supportive of the plan as it is beneficial to the community, the area,	Support noted.

		the town and the residents. It is fabulous.		
166	6	In order to accommodate rapidly evolving policies and technologies for sustainable development the CAAP (and any related planning policies and agreements such as Design Codes) must be able to be updated, at least on an annual basis.		The Sustainable Construction Policy has been future-proofed by deferring the actual standards to the Sustainable Construction Supplementary Planning Document to allow the standards to be
166	4	As Swindon is a town founded on technological innovation, the CAAP strategy should do more to capitalise on the great economic opportunities that exist for communities that play a leading role in the transition to a low-carbon economy	For example by developing the North Star Industrial and Educational areas to be national centres for 'green'	Noted, this suggestion will be taken forward in developing detailed proposals for the North Star Area.
252	1	Welcome the approach to develop an AAP for the regeneration of the Central Area, which will form part of the Development Plan for Swindon.		Support noted.
166	2	The CAAP should do more to address climate change by delivering zero (or low) carbon development. The Swindon Climate Change Action Plan sets out CO2 emission reduction targets of 20% by 2010 and 60% by 2050.	In order to manage progress towards meeting these targets, the CAAP should make clear the contribution each of its strategies will make to delivering the Council's CO2 reduction targets.	The Plan and its policies have been subject to a Strategic Environmental Assessment and Sustainability Appraisal. An additional Sustainability Assessment is not deemed necessary.
104	1	There are inconsistencies with the definition of the central area eg, the map on pg 38 excludes land to the north of GWW. The map on pg 13 shows the Transport Vision boundary, which is consistent with pg 38, but not with the CAAP boundary.	It would aid simplicity to marry up boundaries affecting the central area.	The CAAP boundary is as shown on the Proposals Map. For clarity the LPA would suggest that Inspector recommends that the Maps at pg 13 and pg 38 are edited in accordance with the Proposals Map.
51	1	Does not meet the Statement of Community Involvement regarding clarity of the document. The smaller plans and maps lacked reference points and places referred to in text were not labeled. Document lacked a clear		The layout of the Plan has generally been well received by the public, and is widely perceived as readable and user-friendly. The Implementation Plan considers infrastructure requirements.

		infrastructure plan. If you are expecting considered response from organisations that are only familiar with the AP via this document then the document must be very clear to the lay person.	
51	3	The Implementation Plan: Section 4 Delivery Mechanisms. Concern regarding Lottery funding as this is likely to be unreliable for many years and could therefore limit the development and considerably extend timescales if too much reliance was put on this type of funding.	Noted and agreed that lottery funding cannot be relied upon to deliver the infrastructure needed to secure the successful regeneration of Central Swindon.
51	4	The Implementation Plan: Section 4 Delivery Mechanisms. Concerned that there is not a clearly identified co-ordinating body for the development and no detailed structure plan.	Swindon Borough Council is the key co-ordinating and facilitating body. The Implementation Plan is deliberately flexible so as not to constrain the opportunities that will arise during the
335	1	This Plan has been developed without meaningful consultation with the people most affected and most concerned and most knowledgeable - those who live in the area. The paperwork and 20 minutes tabled in Nov 07 were not at all suitable for the population. The further meeting promised for Jan 08 did not occur until 4 days before submission deadline. None of the questions about canal were addressed, let alone other issues. As a resident (and an informed one) I object to the consultation being considered even minimally adequate and the process be insisted upon by the Government Office with a further 90 days allowed and community planning for real sessions be held, involving all stakeholders but especially residents and small shopkeepers.	There has been ongoing community engagement throughout the preparation of the Action Plan, commencing in April 2006. This consultation has been carried out in accordance with the adopted SCI and Government Regulations.
265	11	Part 1 The Strategy/Development	Support noted

		Strategy. Guiding principles contained in the development strategy contain all the elements of a successful delivery of the AAP.	
265	14	Strategic infrastructure/water infrastructure. Policies and strategies commendable. Very sound and well thought out. Very clear and precise in their aims.	Support noted
104	2	Developer contributions form a significant part of the delivery plan for many of the schemes and innovations planned.	The Council needs to have a clear idea as to how this will work and where the priorities are, and how each priority contributes to the wider overall objective of regenerating the town  The infrastructure priorities are as defined in the Action Plan and amplified in the Developer Contributions Guidance Note. Where funding gaps exist, the Council will look to other fund sources (Growth Points, Capital Funding etc) to make up the deficit. Service Areas have asset management plans and undertake local infrastructure audits to identify priority areas that can benefit from developer contributions. Further work, such as the Transport Strategy will result in a detailed scheme of works necessary to facilitate the successful and sustainable growth of Swindon.
89	1	No comments to make relating to the document and confirm that we have not suffered any prejudice as a result of the lack of earlier consultation.	Noted
88	1	No comments	Noted
314	10	Support the preparation of the CAAP, the broad uses proposed, and the objectives of the CAAP in regenerating the Central Swindon area.	Support noted
166	3	The CAAP should be future-proofed by anticipating the implications of the climate-change bill and embedding a zero/low-carbon approach in all elements of the development.	The Plan can only work within existing legislation. It is considered that we have futureproofed the policy as best it can without exceeding existing guidelines.

356	1	No comments to make on the Plan and do not feel that we have suffered any prejudice as a result of the lack of earlier consultation.		Noted
24	42	The Canal Feasibility Study should be made available to the public and a special exhibition should be held as soon as possible to help convince the public of the viability and benefits, and help avoid the "blight" which may hinder progress.		The Halcrow Feasibility Study is in the public domain and can be viewed at the Council's Premier House Offices.
24	41	There are already many late night reveling places in the area, and too few police to oversee them.	New Registry Office should include a police post, which is lacking in Old Town & Lawn & is causing unnecessary police travel and poor communication with the police. It could also include the Old Town Library. Delete "several" and insert "dozens of".	Suggestions in relation to the Police presence in Old Town will be forwarded to the Police Authority. The proposed text change would not contribute to the clarity of the Plan.
24	40	The traffic modelling by Halcrow is so fundamental to the whole canal routing that it should be the subject of a public exhibition and consultation as soon as possible.		The Halcrow Study is in the public domain, and can be viewed at the Council's Premier House Offices and at the Wilts and Berks Canal Trust outlet at Regent Circus.
24	39	Much of the localised flooding in July 2007, and at other times, was caused by blocked drains (gullies) or insufficient capacity. Gullies should be cleared at least once a year.		This representation will be forwarded to the Council's Highways Section.
351	6	We would like to see the D10 area developed for residential use, as at the moment it is the only large industrial unit in the residential area that fronts Marlborough Rd. The concrete built warehouse, exhaust and tyre-fitting bay does not fit into the landscape.		Area D10 is allocated for residential use in the Local Plan. This allocation is being taken forward into the Central Area Action Plan.
24	38	An ideal location to cover Education / Community / Culture facilities would be the Mechanics Institute.		Such uses would be supported by Policy 17 of the Plan

336	4	Acknowledged that a lack of capacity exists yet failure exists to estimate a sufficient number of school places in line with the residential provision for the Central area.	Provision for at least one new Primary school site needs to be identified in the area.	The Planning Department is working closely with Education to ensure that the education needs of the existing and new residents of Central Swindon are met.
336	5	If Central Area Action Plan is adopted in full, SBC risks a lack of funding. Considerable and unrecoverable monetary costs may occur.		The bulk of the infrastructure costs will be met by the development industry. The Action Plan does not place any commitments on the Council itself to actual deliver infrastructure.
17	3	Until the water cycle strategy has been completed it is difficult at this stage to identify what, where exactly what type of water/sewerage infrastructure upgrades will be required.	Suggest that the final bullet point be changed to be less specific and either say 'Utility infrastructure improvements' or 'Water and Sewerage Company Infrastructure'.	The Inspector may wish to consider recommending that the Plan text be amended accordingly.
16	2	There is nothing under Transport Strategy referring to ways to discourage car use. Pedestrian 'priority' is not the same as pedestrianise. Targeting for additional infrastructure unless for N.M.U's or buses is wrong.		The fundamental principle behind future decisions on transport and movement in Swindon will be 'people not car'. Policy 7 and 8 deal with public transport and pedestrian and cycle movement. Although the focus is on more sustainable modes of transport, vehicular traffic is a reality as identified in the Alan Baxter Report (January 2005) - Swindon Regeneration Framework, Movement and Transport Summary, and it is important that Swindon Borough Council address issues relating to vehicular traffic to ensure an integrated transport system to attract Swindon's residents, visitors and businesses into the town centre.
351	1	The Borough is to be congratulated on this plan. It has been drawn up taking into account a lot of information from a wide variety of sources.		Support noted.
24	36	There is no mention in any part of the Plan about a Design Code. Will there be overall guidance for developers, as in other major development areas?		The Council do not wish to be prescriptive as to the type of design in Central Swindon and would therefore not advocate adopting the design-coding approach for Central Swindon.

24	37		Does quantum mean quantity? If so plain English would be better. The chart on Page 3 shows only 21 residential units in Old Town up to 2011, this is clearly an error as the figure should be approx 2,000.		The Old Town area referred to in the Plan does not include the wider Old Town residential area so does not include the housing commitments and allocations at such area as Pipers Way and Okus.
104	3	CH01	In objective 1, central Swindon should be 'the' destination of choice, rather than 'a' destination of choice.		It is not considered that the amendment would not add to the clarity of the plan.
104	4	CH01	The text defines five distinct character areas, though the map shows six different colours. The purple zone needs explaining.		The purple zone shows residential communities that adjoin the Town Centre, and where improvements should be particularly focused.
265	7	CH01	The 'Introduction' is clear in its aims, objectives and taking on board various action plans. Sets out general procedures, the checks and balances to be applied in the implementation of the plan.		Support noted
4	1	CH01	Welcomes the objectives to co-ordinate and deliver high quality and accessible services and facilities that are needed to support the communities living in or adjacent to Central Swindon. Welcomes the aspirations to provide wider opportunities for Central Swindon living and the creation of safe, convenient, user-friendly and attractive routes into, out of and through Central Swindon to help develop a vibrant and active community. Such objectives will help to reduce the need to travel.		Support noted
211	1	CH02	Supports the strategy outlined by the Borough for the redevelopment of the central area and reiterates its commitment to delivering a high quality and sustainable development at Union Square.		Support noted
166	5	CH02	Welcomes commitment to building	The current Transport and Movement	The principle of modal shift is embodied

			design 'that dramatically reduces its carbon footprint & generates a proportion of its own energy requirements' within the CAAP Sustainability Principle. However transport must also be a key plank of this Principle.	Principle to 'facilitate improvements to all travel modes' will stand in the way of a sustainable future for Swindon, and should be replaced by a principle to 'deliver a modal shift to sustainable travel modes'.	within the Transport Policies of the Plan, which seek to substantially enhance access into and through the centre by public transport, cycle and by foot.
252	2	CH02	Welcome the development principles defined in Chapter 2, as they focus on the key issues to be addressed in order to deliver the successful regeneration of the area.		Support noted
265	13	CH02	The Development Quantum and Phasing. Strategies and policies very sound in their aims for Central Swindon regeneration. Implementation clearly set out - PCT Walk-in centre identified to be completed in first phase, while in main document this is not clear. Flexibilities in strategy sound.		Support noted
80	5	CH02	Plan could explain more clearly what new business development is proposed and how this fits within the context of an economic strategy or other evidence to demonstrate the realism of what you propose and most appropriate options to pursue.		The Council's Economic Strategy "Swindon Economic Development Vision and Framework 2007" (CD2.23), seeks to make Swindon a leading regional centre with an international reputation for innovation, science and technology. The Economic Strategy also seeks to ensure that Swindon has a dynamic and vibrant town centre, with radically improved cultural, education and leisure facilities. These aims are reflected in the Action Plan through the allocation of land for a University and Innovation Park at North Star, through the allocation of land for a prestigious office development at Union Square and through the identification of a cultural Quarter at The Promenade.
24	2	CH02	There is little detail in the Green Spine policy to convince readers that it will bring a major improvement to	Clarification needed on what improvement will it bring to the route between the Town Centre and Old Town	It is not likely that further sections of the Green Spine through Old Town could be realistically delivered within the Plan

			<p>movement. Why does the Green Spine end in the middle of Old Town, it should extend to at least Springfield Road and perhaps beyond.</p>	<p>for vehicles, cyclists and pedestrians, which is bound to become even busier due to regeneration and changes of route.</p>	<p>period so it is not appropriate to include them . With regard to detail, a green infrastructure SPD will be produced which can incorporate further work on its detailed design and implementation.</p>
24	3	CH02	<p>There is mention of “dramatically improved linkages”, particularly between the Town Centre, Old Town and Outlet Centre. It is difficult to see how this can be achieved given the narrow roads, built up areas, and the railway</p>		<p>This might not necessarily mean widening or physical reconfiguration of these identified routes. It is more about being able to navigate around Central Swindon with ease along routes that are pleasant and safe to travel on or through.</p>
241	2	CH02	<p>Unfortunately Transport is absent from the key Sustainability Principle. A modal shift in Swindon is vital to improving health. It would also bring other benefits including enhanced public realm and reduced air pollution.</p>		<p>Transport and movement is given a very high profile at the start of the document in the Development Strategy section. This fundamental development principle is acknowledged to be key in the delivery of a successful and sustainable Central Swindon. Transport is dealt with in detail under Section 6: Transport and Movement Strategy in the Central Area Action Plan. The emphasis within the Section is on increasing choice of travel options available to all so that the car does not dominate or have a detrimental effect on the environment, or the quality of life experienced in the Town Centre.</p>
24	1	CH02	<p>Page 8 mentions "encouraging" reduction of carbon emissions, and a "proportion" of energy requirements. Developers will always try to do as little as possible in order to save money.</p>	<p>The plan should be more robust in its aspirations, perhaps by setting targets.</p>	<p>Policy 2 is deliberately drafted in this way, so as to future proof the Plan. The 'Swindon Standard' for sustainable construction, which comprises a separate document, provides greater detail and can be updated more easily to allow for more stringent sustainable construction requirements in the future.</p>
241	1	CH02	<p>Active Swindon welcomes the Council's stated aspiration for Swindon's development to be sustainable.</p>	<p>Would like to see more in the CAAP to increase levels of walking and cycling by creating an excellent walking/cycling infrastructure along with sufficient revenue resources for staff and</p>	<p>Noted. Enhancing connectivity and pedestrian areas within the Town Centre is a key priority. Developing walking links throughout Central Swindon is integral to Town Centre regeneration. It is also</p>

				programmes that will encourage people to walk or cycle.	important to provide improved connectivity to adjoining residential areas. Further, pedestrian routes will need to be well-defined, well-lit and offer direct routes to users to provide clarity and confidence for walkers.
					Work to complete the urban cycle network is underway as part of the current Local Transport Plan as well as being identified as one of the Swindon 2010 50 Promises. Swindon Borough Council has a Travel Awareness Officer and a Cycle Development Officer to promote sustainable travel options.
24	4	CH02	No mention of the importance of the Mechanics Institute. No plan for the Railway Village or the Town Centre can be complete without a sensible public use for this building, a decision on its future must be made quickly as part of the Action Plan.		The importance of the Mechanics is recognised in Policy 17, which states that development "Development proposals affecting the Mechanics Institute should be sympathetic to the historic character and role of the building and should deliver publicly accessible uses of a nature that would not adversely impact on the amenity of Railway Village residents".
4	4	CH03	Supports Design Strategy but feels that Policy 1 should also include design criteria covering the inclusion of facilities for non car travel modes e.g. cycle storage, pedestrian priority, easy access to public transport.		This level of detail is deferred to the Swindon Central Area Public Realm Strategy SPD
104	9	CH03	The design strategy should acknowledge the need for creativity in the approach to street design, public realm and architecture. Creativity should contribute to a unique sense of		This is included on page 43 under Public Art Strategy
104	8	CH03	Within the text (pg 16) there is some use of urban design terms which may benefit from a little more context or definition (for instance, reference to		The Inspector may wish to raise the profile of the Glossary by reinstating it to the main document.

104	7	CH03	The Design Guide doesn't offer succinct design advice. An early review of this would be beneficial in achieving better standards of design in the town centre, and providing better guidance as to what the LPA expects in respect of improving design.	This might be particularly useful on specific occasions – for instance, the document states that 'contrasting contemporary design [in Old Town] must be of an exceptionally high quality'. Examples and pointers might	The Design Guide is only recently adopted. There are no plans to replace it
24	7	CH03	The Mechanics Institute must be an integral part of this Conservation Area. Some public use must be found for it, eg, why not have part of it become a centralised information advice and cultural centre and a walk in health centre.		The importance of the Mechanics is recognised in Policy 17, which states that development "Development proposals affecting the Mechanics Institute should be sympathetic to the historic character and role of the building and should deliver publicly accessible uses of a nature that would not adversely impact on the amenity of Railway Village residents".
16	10	CH03	Why does section not include reference to a Green Plan being provided? How can the skyline of the town be improved at night by lit tall buildings? Plan refers to "night-time views" - what about the effect of light pollution on the surrounding area?	Remove reference.	Light pollution will be considered when specific buildings or features are identified as potential candidates for uplighting. The design policy in the Core Strategy and at present, the Local Plan would ensure this. It is not clear what the objector means with reference to a Green
16	11	CH03	Bullet 2 talks of active frontages - this could mean anything and many people will not understand what it means. Anything fronting the public realm must be of high quality design and enhance the area.	The Policy should include reference to high quality construction not only sustainable or complementary design.	The Inspector may wish to raise the profile of the Glossary by incorporating it in the main document. The Design Policy does call for high quality design.
24	6	CH03	The Town Centre section mention of residential uses needs reinforcing. As well as "gateways" in the Town Centre para, there should also be feature gateways on all main routes into Swindon.		The residential mix is also included in the policy and is already high profile. Main routes into Swindon outside the CAAP boundary will be addressed by the Core Strategy.
24	5	CH03	The Design Principles Section should include a requirement to include residential use above all offices, shops etc to help with security and ensuring areas do not become 'dead' at night.		Agreed. The Design chapter states that successful regeneration will depend on broadening the mix of uses. Injecting housing into the mix wherever possible will enable activity to be stretched beyond

					traditional shopping and office hours. Specifically the policy requires proposals to consider a mix of uses including
270	2	CH03	The plan notes the role that active frontages play in reducing crime. This will only be effective if areas have a mix of development so that some frontages are active at all times, rather than the strong division between retail and evening leisure uses that currently exists. This is of particular importance given the separate foci that the plan has for parts of the Town Centre (Section 7). Whilst consideration of mixed uses is mentioned in the policy on page 19, an obligation only to 'consider a mix of uses' would seem to be inadequate if the crime reduction aims stated on page 17 are to be fulfilled.	Rephrase so that the obligation is to 'include a mix of uses' rather than just to 'consider a mix of uses'.	The Policy itself expects developments to demonstrate how their proposals incorporate active frontages where development forms part of the Town Centre and achieve Secured by Design status.
104	6	CH03	The third point states that buildings should offer a diversity of uses. Some buildings will be single use, and it is not clear what is sought to be achieved by seeking diversity as stated.		The thrust of the policy to seek a diverse mix of uses is clear.
24	8	CH03	Re the Tall Buildings Section, the Murray Tower is the only tall building in Swindon. It would create greater design interest if there was a central feature tall building at the new university, and a tall tower block in the centre of the town centre.		Noted
211	4	CH03	Support for the principles within the design strategy and agrees with the Council that good design has an important role to play in raising the profile of Swindon, creating and reinforcing a distinct local identity and sense of place and attracting inward investment.		Support noted

270	3	CH03	Whilst supporting in principle the requirement that proposals for tall buildings should 'enhance the existing skyline of the town', this appears to be so subjective a requirement as to be of little value.	Add clarification of what is meant by 'enhance the existing skyline'.	If a tall building detracts from the skyline by virtue of its design, bulk, scale, massing or finish or is inappropriate given its location adjacent sensitive buildings or appeared to dominate and overshadow domestic scale properties it could reasonably be considered to fail to enhance the skyline.
104	16	CH03	Re tall buildings, the word 'excessive' seems redundant in respect of local climatic effects. Tall buildings will inevitably affect local climate.	It may be more appropriate to seek to manage and minimise these rather than try to define what is excessive in each case.	They may well affect local climate but at the point where they impact on it to a degree which makes its immediate environs uncomfortable places to be they become a concern. Not agreed
104	15	CH03	Re tall buildings, largely by definition, tall buildings may not be sensitive or appropriate to context. It seems unreasonable to offer these as possible reasons for rejection.		Not agreed
104	14	CH03	Re tall buildings, there is no existing assessment of the skyline of Swindon in order to know whether a proposal will enhance it. Is the current skyline cherished or derided?	Such an assessment should consider short, long and strategic views of the town (the DMJ tower, for instance, is visible up to 10 miles away in some directions).	A more detailed Tall Building Guidance Note is under preparation to amplify the policy in accord with CABEs tall building guidance.
265	1	CH03	The design strategy is very sound in its aims, giving clear and robust guidance that are flexible in nature and having a desirable outcome for the community.		Support noted
289	2	CH03	Under Existing Residential Communities, why is there the need always to continue with the same when in some cases a change could be a big	Policy 1, add "where the existing design is good and much appreciated" in front of "respect the context of the site and character".	The Inspector may wish to recommend amending the plan accordingly.
289	1	CH03	What does "active frontages" mean?		The Action Plan defines active frontages in some policies. The Inspector may wish to include the definition in the Design Policy and also raising the profile of the Glossary by including it in the main
192	3	CH03	Tall building policy should ensure that redevelopment considers the existing		Agreed. The Tall Buildings Policy requires that all proposals respond sensitively to

			character and style of building and the surrounding area, especially in the case of the Mechanics Institute. This method of compliance with surrounding character and standard should be applied to all areas included in the CAAP, as has been the case with the Central Library.		its site and be appropriate to its context
104	13	CH03	Re tall buildings, the use of the phrase 'exceptionally high quality' offers difficulties, in that there is no real benchmark or baseline either in the AAP or the design guide as to how the Council might define and consider this.		The Swindon Design Guide offers guidance on good design generally. All Tall Building proposals would be considered by an independent panel, which would assess whether the proposal is of an 'exceptionally high quality'.
97	1	CH03	Difficulty in establishing, quantifying and thus achieving an, 'exceptional quality', in tall building design due the ambiguity of the wording in Policy 1.	Removal of the first bullet point in the section will remove the ambiguity in tall building design. The remainder of the bullet points identify coherent tests of standards for tall buildings in the area.	The need for exceptional design quality in tall buildings is especially important given their impact.
108	2	CH03	The design policy should include; 'the respect for grain and texture', with particular reference to the residential townscape. This aspect has already been well covered in the guidance for backland development.	Extracts from this guidance could be used in respect of new residential development in existing residential areas within the central area, irrespective of whether it is backland or	Grain and texture are often considered to be unfriendly terminology and with a view to making the document as accessible as possible we have refrained from using it. The bullet point that required design to 'respect the context of the site and the character of the part of Central Swindon within which it is located' covers these points.
80	17	CH03	We support the general principles contained in this policy and the commitment to a high quality of design. The policy includes a set of criteria for possible new 'tall buildings'.	There would be greater certainty and clarity if the plan identified where tall buildings might be developed and the form such development should take.	A more detailed Tall Building Guidance Note is under preparation to amplify the policy in accord with CABEs tall building guidance.
211	6	CH03	Welcome the establishment of the Swindon Design Review Panel and would welcome the opportunity to work with them in the proposals for Union Square. The success of the redevelopment of Swindon Central Area will need to include flagship buildings		Noted

			and therefore be of a significant scale and massing in order to raise the profile of Swindon Central Area and attract inward investment.		
270	1	CH03	The following section (on Old Town) notes that 'Old Town is regarded more favourably than the Town Centre in urban design terms due to its collection of high quality older buildings.' Given this, and whilst not wishing to hold the Town Centre in the past, the section on the Town Centre should make reference to retaining and enhancing the few 'high quality older buildings' that remain in the Town Centre. A few high quality old buildings in a modern town centre will help to add character and variety in the same way that the plan recognises that in Old Town 'New development should respect the special local character of Old Town and proposals incorporating contrasting contemporary design must be of an exceptionally high quality.'	Add reference to retaining the highest quality older buildings within the Town Centre.	We do not disagree with the sentiment of the representation. The Inspector may wish to consider adding wording to this effect to Policy 1 - Design.
211	7	CH03	Supports Policy 1 and will be submitting a comprehensive design and access statement in support of its proposals for Union Square. Supports policy guidance relating to tall buildings and reiterates the important contribution that tall buildings can make to the successful regeneration of a town centre and also long term economic		Support noted
104	5	CH03	It is not clear what is meant by primary routes in relation to active frontages. Also active frontages are desirable on many routes and should be sought wherever practical and wherever this would have a positive benefit on the streetscene.	This could be helped by rewriting the second point in policy 1 (pg 19) as, 'incorporate active frontages, especially where the development forms part of the town centre'.	The Inspector may wish to consider the inclusion of the word 'especially' to widen the application of the policy to other

104	12	CH03	Re tall buildings, whilst the applicant should ensure that they are applying an 'exceptionally high quality design' to tall buildings, the Council should use the Design Panels to come to an informed and independent conclusion in relation to this.		Agreed. Tall buildings as part of large schemes will also be sent to CABE for comment
104	11	CH03	CABE stands for the Commission, not the Centre, for Architecture and the Built Environment (also pg 21).		The Inspector might wish to recommend that the Plan be amended accordingly.
104	10	CH03	The presence of two conservation areas covering much of the Old Town area might be worth mentioning here.		It is considered that the text "Much of Old Town has Conservation Area status" covers this.
108	1	CH03	Objection to the word, 'considerable' in relation to the height of new tall buildings. This is subjective and the interpretation could easily defeat the argument in the previous paragraphs. Even, 'moderately higher', may adversely affect the amenity of the neighbourhood.	Omit the word, 'considerable'.	The proposed amendment would not add to the clarity of the Plan.
289	3	CH03	Is lighting and "improving night time views" compatible with seeking to reduce the carbon footprint? Already some Councils are turning out street	Suggest this sentence is omitted. Later on, remove references to up lighting, and in delivery section.	Appreciate the principle of reducing carbon footprint through reduced lighting but Swindon suffers from a poor image and by raising the profile of our best architecture we can promote Central Swindon as a newly regenerated and strengthened community and destination. As an example of innovative thinking St Marks Church in the Great Western Heritage Area has recently been uplit using energy saving lighting which significantly reduces its carbon impact while highlighting a treasure to commuters coming into Swindon by train from the west.
104	22	CH04	There remains a lack of detailed knowledge about green roofs, scepticism amongst developers and a lack of financial incentives to pursue	It may be premature to place significant expectation (through policy 2) on the provision of green roofs at this time, particularly in advance of any local	The benefits that Green Roofs offer, many of which directly relate to the objectives of the Action Plan, warrant the approach adopted. Green Roofs

			green roofs. There are questions about structural load to address & no Government guidance on the issue.	guidance, promised at the foot of page 25.	Guidance is currently being prepared, which will include case studies on their
166	8	CH04	SCAN supports the inclusion of the SPD for Sustainable Building Design and Construction and the 'Swindon Standard'. As noted above, this must be flexible enough to accommodate future advances in sustainability policy and technology.		Support noted.
104	21	CH04	Where green roofs become publicly accessible, there must be a question about whether this becomes part of the stock of public open space, and whether the Council would be prepared to adopt it as such.		It is not the intention that the Council will adopt any Green Roofs. Detailed Green Roofs Guidance is currently being prepared to assist developers.
166	10	CH04	SCAN supports the strategy to 'maximise re-use, recycling, composting and energy recovery strictly in that order of priority'. However, the CAAP contains no strategy for the top priority 're-use',	Information on how 're-use' will be maximised should be included.	Policy 2 states that all proposals will be rigorously examined against the 'Swindon Standard', outlined in the Sustainable Design & Construction SPD. The SPD contains further detail on the waste management aspects of the Code for Sustainable Homes and it is not considered necessary to repeat this in the Area Action Plan.
97	5	CH04	Development will result in some form of impact and demonstrating that surface water run-off will be no worse than before the development is an unrealistically high target. On site mitigation of surface run-off may not always be practical especially in an urban area where high-density developments will be common.	The test should relate to whether surface run-off results in an unacceptable impact. Identified paragraphs should be removed from the policy, sufficient control over these issues exists through the requirements for Flood Risk Assessments and through the guidance of PPS25	In order to comply with Level 3 of the Code for Sustainable Homes, housing development of 10 or more dwellings (or more than 0.5 ha) must demonstrate that peak run-off rates and annual volumes of run-off post development will be no greater than the previous conditions for the site. The Environment Agency guidance on Sustainable Urban Drainage Systems (SUDS) highlights the benefits of providing a sustainable solution to help reduce and manage surface water run off which might otherwise cause flooding and pollution. Developers are encouraged to work with the Council and the

97	4	CH04	Sustainable Water Management - It will be very difficult, and resource intensive for a development to demonstrate categorically that there is adequate water capacity. In addition, the performance of any drainage system is ultimately a matter for the Utilities Companies in providing an adequate foul system. The capacity of a drainage system could be affected by the maintenance regime of the Utilities companies, which should not reasonably be a factor to affect the granting or refusal of planning permission.	In areas where specific problems are known to exist, or where a proposal would have a particular impact the Local authority, through consultation with the Utilities Companies, scope exists to request addition information and/or seek control through the planning conditions and obligations.	Environment Agency to incorporate SUDS in all new development. This should be considered at the earliest stages of master planning or layout design and early consultation with the Council is advised.  It is important that where major development proposals are involved, that the developer liaise with the Environment Agency and Thames Water at the earliest opportunity to ascertain water capacity issues. The Council wants such issues to be considered upfront.
97	3	CH04	Sustainable Construction, Sustainable energy supply. The rigid requirements for all major proposals to provide on site renewable energy is too onerous as this will not be appropriate for some schemes. The alternative requirement to connect to a 'community energy scheme' relies on such a scheme being in existence.	Reword policy to: Major development proposals should incorporate on-site renewable energy and/or seek to establish or connect to an available 'community energy	It is considered that the policy wording is sufficient. Where a 'community energy scheme' is not available, major new developments will be required to meet the requirements of the 'Swindon Standard'.
97	2	CH04	Policy content represent an unnecessary duplication with the contents of the adopted Sustainable Building Design and Construction SPD.	Removal of this policy would avoid duplication with the SPD.	The SPD has been adopted to amplify statutory policy. In order for the Council to apply the requirements of the SPD it must be included in the statutory Development Plan.
289	5	CH04	Sustainable Waste Management. It would be more readily intelligible to the reader if minimising the use of raw materials was followed by "and maximising the use of secondary aggregates."		It is not considered that the suggested wording would add to the clarity of the

289	4	CH04		Put "All" in front of Development proposals, and delete "and occupying areas of one hectare or more." And in delivery section) End of para, replace "supported" with "required".	Given the resource requirements of implementing such a policy, it is considered important to concentrate on major developments. Major developments will deliver the bulk of new development in Central Swindon. Requirement for a Flood Risk Assessment for developments occupying areas of 1 hectare or more is following guidance in PPS25. Use of SUDS is not made a requirement in new developments because there will be circumstances where incorporation of SUDS would not be possible or appropriate.
16	9	CH04	Under Sustainable Water Management para 4, all development proposals should be considered, not only those more than 1 ha.	Delete size reference. SUDs do not work on floodplains – so new development of any size on any flood area must be refused.	This policy is in accordance with national Planning Policy Statement (PPS) 25 'Development and Flood Risk'. The aim of this planning policy is to avoid inappropriate development in areas at risk of flooding, and to direct development away from areas at highest risk. The policy stipulates that planning applications for development proposals of 1 hectare or greater in Flood Zone 1 and all proposals for new development located in Flood Zones 2 and 3 should be accompanied by a Flood Risk Assessment that identifies and assesses the risks of all forms of flooding to and from the development and demonstrates how these flood risks will be managed. PPS25 also requires local authorities to promote the use of SUDS in Local Development Documents for the management of run-off wherever practicable in the design of development.
211	8	CH04	Supports the Council's commitment to achieving the sustainable development of the Central Area. New development should seek to achieve the best standard of sustainability that is viably possible. The Council must ensure that		Support noted.

			<p>the imposition and implementation of sustainability objectives should not be instead of the delivery of other important objectives identified for the town and the appropriate sustainability standard should be based on the Swindon Standard but also considered on a site basis to ensure that proposals remain viable.</p>		
17	2	CH04	<p>A key sustainability objective for the preparation of the LDF should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paras B3 to B8 of PPS12 place specific emphasis on the need to take account of water supply and sewerage infrastructure in preparing LDDs. We are therefore pleased that the draft document has a section on sustainable water management (page 24). However, this section relates mainly to flooding and makes little mention of water and sewerage infrastructure.</p> <p>It will be essential that the AAP makes reference to the provision of adequate water and sewerage infrastructure to service development to avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property, pollution of land and watercourses plus water shortages with associated low pressure water supply problems.</p>	<p>The Sustainable Water management section should include additional text along the lines of: "Developers will be required to demonstrate that there is adequate water supply and waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing water and/or waste water infrastructure. Drainage on the site must maintain separation of foul and surface flows. For further information on both water supply and sewerage/ sewage treatment please contact Thames Water Utilities , Kew Business Centre on 0845 850 2777, <a href="http://www.developerservices.co.uk">www.developerservices.co.uk</a>, email: <a href="mailto:developer.services@thameswater.co.uk">developer.services@thameswater.co.uk</a> . For Thames Water to provide these essential services most effectively, it is vital that developers and local authorities consult Thames Water at the earliest possible stage in any development proposal."</p>	<p>Chapter 4 states that "it is essential that provision is made for appropriate water and sewerage infrastructure to service development and to avoid unacceptable flood risk impacts". Policy 2 requires water conservation and recycling measures in the construction and operation of all new developments and requires major development proposals to demonstrate that there is adequate water capacity both on and off site to serve the development.</p>
166	9	CH04	<p>SCAN supports the development of a decentralised sustainable energy supply scheme.</p>		<p>Support noted</p>

97	6	CH04	Requirement is too onerous and could restrict developer and consumer choice, inevitably impacting upon values and the overall vibrancy of the local market. This rigid policy would also impose a restrictive form of architecture in the area, this could result in the lack of visual interest and sense of place in the area. The contents of this policy represent an unnecessary duplication with the contents of the adopted Sustainable Building Design and Construction SPD.	Paragraph is unnecessary duplication and should be removed. The policy and the relevant separate SPD have already sufficiently identified the council's support and encouragement for Green Roofs.	Policy 2 of the Area Action Plan reflects the requirements of the SPD and puts it into context with regard to the central area of Swindon. It is considered that the promotion of Green Roofs is particularly relevant to the type of new development anticipated in the central area, and therefore the inclusion of this policy in the Area Action Plan is relevant.
108	3	CH04	Ongoing maintenance of the measures stated in the policy is also an important management issue.	The ongoing maintenance needs to be stressed in the policy.	The Inspector may wish to consider wording to the effect that all applications must demonstrate how the proposal intends to deal with management and maintenance issues at the design stage as the AAP does at Policy 3 - Public
104	17	CH04	Whilst Level 3 of the Code for Sustainable Homes is an admirable aim at this time, it will soon be redundant.	The Council should be looking to Level 4 standard as an aspiration, because it would be easier to adapt Level 4 buildings to higher levels in the future, and also because of the lag time when Level 4 does become the required standard.	No where in the Plan is Level 3 specified. Policy 2 is deliberately drafted in a way that future proofs it, by cross referring to the "Swindon Standard" which can be updated on a regular basis.
166	7	CH04	With ground transport responsible for 25% of UK CO2 emissions, vehicle miles travelled pa increasing faster in Swindon than the national average, & the projected population increases, the sustainability strategy cannot succeed without modal shift.	Transport should be included as a key plank of the Sustainability Strategy.	Transport and movement is given a very high profile at the start of the document in the Development Strategy section. This fundamental development principle is acknowledged to be key in the delivery of a successful and sustainable Central Swindon. Transport is dealt with in detail under Section 6: Transport and Movement Strategy in the Central Area Action Plan. The emphasis within the Section is on increasing choice of travel options available to all so that the car does not dominate or have a detrimental effect on the environment, or the quality of life experienced in the Town Centre.

104	20	CH04	Questions as to the management and maintenance of green roofs, which can presumably become overgrown and untidy - visually unattractive - if not managed effectively.		Detailed Green Roofs Guidance is currently being prepared to assist developers.
17	1	CH04	Support Policy 2 in relation to the Sustainable Water Management Section in principle, but consider that it requires clarification so that it covers all water issues.	Suggests that Para 2 is amended as follows, "Major development proposals will be required to demonstrate that there is adequate drinking water, surface water and foul water capacity both on and off site to .."	The para as currently drafted would cover all of these water issues. The change would not add to the clarity of the Plan.
34	1	CH04	Support Policy 2 for Sustainable Construction. Sustainable use of resources and adaptation to the effects of climate change are important considerations for all new development.		Noted
252	8	CH04	Welcome the Sustainability Strategy developed and AAP Policy 2 which sets out the requirements for development in order to meet the 'Swindon Standard'. We confirm that this accords with RPG10 Policy RE6: Energy Generation and Use and Policy RE2: Flood Risk. Would draw your attention to amended Development Policy G and RE5 in the draft RSS, setting zero-carbon requirements for residential and non-residential development, and to Policy F1: Flood Risk.		Noted.
353	2	CH04	Agree with soundness of Policy 16. Objection to University at Coate,	A more central location for the University would be a more sustainable	Noted
24	9	CH04	As well as reduced carbon emissions future design should include energy creation opportunities, particularly on tall buildings and in conjunction with green roofs.		Noted
80	7	CH04	The plan contains a commitment to measures for mitigating and adapting to climate change. Policy 2 gives	The mechanisms for delivering these ambitions are set out more fully in a separate SPD but it would have been	Noted. The impacts of the Area Action Plan and any relevant SPDs will be monitored through the Annual Monitoring

			expression to these initiatives and states how you will look to take them	helpful for the plan to include measurable objectives against which to gauge the success of the plan's approach.	Report (AMR) that the Council must produce. Significant effects, as predicted in the Sustainability Appraisal, will also be monitored through the AMR.
252	4	CH04	Welcome the Design Strategy aiming to ensure high quality design for development in the Swindon Central Area, which is line with RPG10 Policy EN4 and draft RSS Development Policy E.		Support noted
24	10	CH04	As well as improved drainage systems there must be far better attention to gullies. The present SBC programme in which most gullies are cleaned once every 2.5 years is not acceptable and was partly to blame for the flooding in July 2007.		This has been noted and comments passed on to the relevant SBC department. Highway and land drainage is currently carried out as per The Swindon Residents Charter, which states "We aim to provide a Highway and Land Drainage Service which: * Is based on customer needs * Complies with the customer charter. * Is accessible to all. * Is cost effective and sustainable. * Complies with best practice. * To ensure that where practically possible the flooding risk to property is minimised and the highway network continues to be available during a flood event..
241	4	CH04	Transport should be included as a key objective of the Sustainability Strategy. With car usage increasing faster in Swindon than the national average, large projected population increases and rising obesity levels the sustainability strategy cannot succeed without a modal shift to sustainable transport to encourage people to walk and cycle. This includes infrastructure, as well as revenue funding for more officers and programme to help bring about such a change.		Section 6 of the Area Action Plan deals with transport and movement and there are specific policies dealing with traffic management, public transport, pedestrian and cycle movement and transport infrastructure needs resulting from development. Section 6 states that the impact of development proposals on the transport network of the town centre must be considered in the context of wider regeneration objectives, not in isolation.

314	1	CH04	<p>Sustainable Development</p> <p>Broadly supportive of objective to ensure that 'new development promotes energy efficiency, prudent use of resources, and makes a positive contribution to the environment.'</p> <p>Consider that it may not be possible for all developments to meet the 'Swindon Standard' and that in this respect, flexibility should be built in to the policy. Considers that the Council should take a pragmatic and realistic view as to what is achievable (and commercially viable) on individual sites.</p> <p>The Council should strive to achieve a balance between sustainability factors and the positive effects of regeneration which development can have.</p> <p>Considers that the primary sustainability focus should be on energy efficiency in design and layout first, before renewable energy sources.</p> <p>Reference to the Swindon Sustainable Building Design and Construction Supplementary Planning Document states that commercial (and therefore retail) development is subject to a BREEAM target of 'Excellent' rating. As per previous representations, we reiterate that it may not be possible to achieve an 'Excellent' standard in all developments. In particular, refurbishments and extensions to buildings may find it difficult to meet</p>		<p>Noted. The purpose of the Swindon Sustainable Design &amp; Construction SPD is to set out the Council's commitment to achieving sustainable development and to raise awareness of how the development of land within Swindon can contribute towards sustainability. It states that achieving the Swindon Standard will be much easier and potentially less expensive when sustainable design issues are considered early in the design process, and early discussion with the Council is encouraged to meet the standard.</p> <p>The Sustainability Appraisal of the SPD discussed potential implications of the Swindon Standard requirements, including the potential financial implications associated with the attainment of sustainable design and construction being identified as a barrier to implementation. However, research suggests that careful consideration of designs and specifications at the earlier planning and design stages can help to minimise cost premiums, particularly when compared with more ad-hoc approaches.</p>
104	19	CH04	<p>The status of the Central Swindon Sustainable Waste Management Scheme should be clarified.</p>		<p>This is currently being drawn up by the Council in partnership with InSwindon (Swindon Town Centre Management) and other key stakeholders.</p>
104	18	CH04	<p>Swindon is very positive in its pursuit of higher standards of sustainability,</p>	<p>Level 6 standards have been achieved on the ground (albeit at the BRE in</p>	<p>Policy 2 is deliberately drafted in a way that future proofs it, by cross referring to</p>

			evidenced by Heelis and the involvement of Kevin McCloud/HAB.	Watford) and this should be the ultimate aim.	the "Swindon Standard" which can be made more demanding as new technology / Government Guidance becomes available.
265	2	CH04	Sustainability Strategy. Strategies and policies in this section have clear and worthwhile aims in transforming the central area of Swindon. The policies and strategies are robust with sound monitoring and deliverable processes.		Support noted
38	1	CH04	Support and endorse policies concerning green roofs, but would ask that green facades and complementary gardens at ground level be included in proposals to better provide for connectivity of		Noted. Green facades and complementary gardens will be considered in the Green Roofs Supplementary
80	18	CH04	We support this policy.		Support noted
166	22	CH05	The re-instatement of the canal must not occur at the expense of funding to ensure that Swindon's development is low-carbon and sustainable.		Noted and agreed.
166	17	CH05	While SCAN welcomes the creation of bus lanes, cycle lanes and improved pedestrian facilities along these routes, the CAAP does not say how the impact on car-traffic will be managed.	There should be accompanying strategies to reduce car traffic along these routes (e.g. through provision and promotion of alternatives).	This issue is considered in detail by the Local Transport Plan.
166	21	CH05	Given the importance of the Green Spine for pedestrian and cycle transport, there should be special requirements for these developments to accommodate and indeed promote	For example in addition to cycle parking facilities, secure storage/drying space for helmets, panniers and outdoor gear should be provided (e.g. cloakrooms).	Policy 5 requires new developments to prepare a Travel Plan, which will address such matters as the provision of secure cycle parking, shower rooms and storage area.
24	13	CH05	The gateways principle should apply equally to the main routes into Swindon, eg Marlborough Road, Devizes Rd, Oxford Rd and Northern Turnpike. Signs to say eg "Welcome to Swindon - Established 1086 - a place to be proud of".		These areas lie outside the AAP boundary

166	18	CH05	SCAN Suggests that the Green Spine is extended approx. 100m further along Devizes Road to the Old Town Railway Path.	Noted. This extension would be subject to feasibility which can be determined at the detailed design stage.
16	7	CH05	There should be reference to the area through which the Green Spine passes – these routes will need very different street furniture, design, lighting etc. (It is meant to be an attraction).	The AAP acknowledges that the Green Spine will change character in different parts of the town as it responds to the different environments it travels through. Efforts will be made to have a consistent approach to street lighting and furniture to make it feel like one extended route.
24	15	CH05	The Green Spine should continue to at least Springfield Road, or even to the new Croft Road roundabout as this is a major route from Devizes / Wroughton to Swindon.	These phases would not be deliverable in the Plan period and cannot, therefore, be included at this time.
166	19	CH05	The CAAP could do more to emphasize the health benefits the green spine would bring to Swindon and links to PCT/Active Swindon initiatives.	The introductory text to Green Infrastructure section states that GI has a valuable role in delivering health and well being benefits to local communities.
80	8	CH05	Serious concern about proposals for a canal because of the risk that they could impair the potential & delay the delivery of regeneration. The canal may not be sufficiently progressed to be a proposal capable of being delivered in the plan period.	A Master Planning approach is being pursued at locations the route of the canal interacts with a development area. This approach will enable the development to take place in advance of the canal.  The Plan-period runs to 2016. It is intended that detailed designs of the canal and Implementation Plan would be in place within 2 years of adoption of the Plan. The construction period for the canal would be around 2 years.
24	12	CH05	It is agreed that there is a need for "greatly improved accessibility and linkages" but we fail to see how public realm measures are key to achieving	Public Realm is the routes and spaces people use to travel to and from places. If they are higher quality, signed better and more pleasurable to use it follows they will promote wider accessibility and
166	20	CH05	The lighting strategy should consider impact on CO2 emissions and light	Light pollution will be considered when specific buildings or features are

				pollution. For example, uplighting (p. 39) can contribute significantly to light pollution.		identified as potential candidates for uplighting. The design policy in the Core Strategy and at present, the Local Plan would ensure this. It is not clear what the objector means with reference to a Green
24	14	CH05	Improvements to the Victoria Road "link road" is needed, but it is made difficult by the constrained and busy junction with Bath Rd and Devizes Rd. It would help greatly if there were a connecting road from Victoria Rd to Drove Rd / Cricklade Rd.			Groundwell Road links the two round the gyratory. These constraints will all be assessed as detailed designs for the Green Spine are drawn up. These designs include functional engineering solutions alongside more aesthetic considerations.
72	3	CH05	Suggest that British Waterways should be mentioned alongside the Wilts and Berks Trust in an advisory capacity but note that we may deliver the vitally important link to the Kennet and Avon Canal at Semington in the future.			The Inspector may wish to recommend that the Plan be amended accordingly.
241	10	CH05	Active Swindon supports development of the Green Spine. This will be key for opening up the benefits of the Town Centre development to broader areas of Swindon, to encourage sustainable transport and improve public realm.			Support noted
241	8	CH05	Active Swindon supports the improvements to the railway station frontage, its connection to the town centre via a 'desire line' and plans to make the route more pleasant for pedestrians.			Support noted.
38	2	CH05	Support the Green Spine and Spaces sections.	When describing individual parks, the potential for biodiversity enhancement should be mentioned, eg, sympathetic management of hedgerows in Ferndale South Recreation Area.		The Inspector might consider recommending that the Plan text be amended accordingly.
241	7	CH05	Under the subheading 'Primary Routes in Central Swindon' Active Swindon supports the strategies to improve the pedestrian experience and meet the			Support noted.

			needs of cyclists by provision of secure cycle parking.		
241	6	CH05	Under the subheading 'Quality of the Public Realm', the first bullet should be expanded to include a reduction in traffic volume and congestion, in addition to 'encouraging low-vehicular traffic speeds'.		It is not considered the change would add to the clarity of the Plan
241	5	CH05	The objectives for this principle should include an objective to reduce car domination of the public realm. This is consistent with the Council's aspiration to ensure that 'the car does not dominate...the environment' (p.55)		Page 29 states that high quality public realm should seek to improve ease of movement by encouraging low-vehicular traffic speeds through careful design. The Transport and Movement chapter goes into even greater detail about the people not cars philosophy that forms the cornerstone of the Council's transport
38	3	CH05	Support measures to safeguard the canal route.	Would ask that additional land either side of the route should be safeguarded and identified prior to the EIA process, to ensure that Green Infrastructure, green spaces and public realm development is possible alongside the	Noted
80	10	CH05	A new canal would appear to have implications for a much wider area in terms of disturbance during construction, its influence upon the pattern of land uses and its affect upon the functioning of the transport	If policy 4 is retained in an amended form, suggest the plan will need to be reviewed when the project has been more fully investigated. Suggest that this would need to be sooner than the review 2 years from adoption currently envisaged in policy 4.	The safeguarding approach, whereby the canal is safeguarded in an adopted DPD will open up the possibility of securing funding from a wider range of sources than if the canal was not safeguarded. Therefore the safeguarding of the route is an important stage, that needs to be in place, in advance of the finalisation of the Implementation Plan. 2 years is considered a realistic window within which to identify funding opportunities and progress detailed plans.
72	2	CH05	Believe that greater mention should be made to ancillary Canal development which will be needed in the future to support users of the Canal such as sanitary stations, pump out facilities	As a minimum, access needed for a crane to remove boats in need of repair for transportation to other areas is required). Such facilities should be 'planned for' and contributions sought if	This is considered too much detail for the Action Plan Canal Policy to cover. These issues will be covered in the detailed design of the scheme.

			and possibly even a repair yard.	the facilities cannot be provided as part of a Canal scheme.	
24	16	CH05	It is encouraging to see that the Mechanics Institute is to be illuminated, but it should first be brought into public use and restores. The redeveloped Locarno should be added to the list.		The Locarno lies just outside of the Central Area Action Plan boundary.
289	7	CH05	Transport section does not say where traffic will go if it does not go along Faringdon Road and the Green Spine.		<p>The Halcrow Study notes that there would be a significantly increased traffic movement along Great Western Way and along Kingshill Road towards Old Town. Traffic travelling into the centre from the Great Western Way would then be guided to the proposed strategic car park at North Star so removing the need for this traffic to use the Central Swindon road network south of the railway.</p> <p>A Boroughwide Transport Study is being prepared which will consider in detail the wider high implications of the closure of Faringdon Road and Fleming Way to through traffic. This Study is also considering how traffic levels through Old Town can be better managed.</p>
289	6	CH05	Support for green spaces and the green spine. It is not clear which sections, if any, will have motorised traffic.		Support noted. Those sections on the map that follow existing vehicular carriageways will still carry traffic
24	18	CH05	The reinstatement of the canal from Wootton Bassett, through Kingshill to Swindon and Cricklade is strongly supported. However the closure of Faringdon Road will cause an enormous new traffic problem.	It is difficult to see what alternative route can be used, this should be explained in any public consultation.	The Halcrow Canal Feasibility Study includes a transport model which concludes that there will be greater vehicular movements along Great Western Way and Kingshill Road. A Borough-wide Transport Study is in preparation which will consider further the wider transport implications of the canal and will provide recommendations as to how any adverse impacts of the canal on the transport network can be mitigated.

24	17	CH05	Has the proposed tower near the Turnpike been delayed or rejected?		It isn't clear which application the objection refers to.
16	8	CH05	It should be made clear in the text whether all parts (and which parts) of the Green Spine will be shared with regular traffic (not buses). This could be deceptive to the reader. Make explicit.		The map on page 38 shows the route of the green spine and hence where it will follow the course of vehicular routes. There are no plans to remove traffic from any of these routes (save Fleming Way which will be bus only)
80	9	CH05	Whilst recognising the importance being attached to how a canal might boost the attractiveness of the central area and the town as a whole, we suggest this aspect of the plan (policy 4) needs to be reconsidered.	The plan needs to have greater clarity about what precise areas need to be safeguarded and what the Council will be looking to explore with land owners and developers.	This will be achieved through the master planning of areas were the canal / canal basin would interact with major development proposals. Such an approach will deliver greater flexibility, as master plans can be readily updated.
166	16	CH05	SCAN supports development of the Green Spine. This will be key for opening up the benefits of the Town Centre development to broader areas of Swindon, to encourage sustainable transport and improve public realm.		Support noted
72	1	CH05	Support attempts to reinstate the Wilts and Berks Canal route through the centre of Swindon and believe that it will bring huge regeneration, tourism, biodiversity, sustainable transport and health benefits to the population.		Noted
104	30	CH05	Fleet Street is a major route in central Swindon with very significant issues, a major cycle parking node and a junction with Bridge Street, but it is not mentioned at all in the list of public realm improvements.		Fleet St was the subject of comprehensive public realm improvements, including its part pedestrianisation, in 2001. This is not considered a priority area for public realm
166	12	CH05	Under the subheading 'Quality of the Public Realm', the first bullet should be expanded to include a reduction in traffic volume and congestion, in addition to 'encouraging low-vehicular traffic speeds'.		Transport and Movement has its own high profile chapter. It is not considered this would add to the clarity of the Plan

104	35	CH05	In addition to signage and lighting, many of the principal streets in the town centre do not have street names to identify them. This decreases the legibility of the central area.	The AAP should encourage street naming on all streets. In the town centre, this could be a public art opportunity. Limited advice is set out in the public realm strategy.	A Wayfinding and Signage Strategy has resulted in new signage and street name plates that will be secured to corner buildings in Summer 2008.
241	13	CH05	The CAAP should do more to emphasize the health benefits the green spine would bring to Swindon and links to PCT/Active Swindon initiatives.		The introductory text to Green Infrastructure section states that GI has a valuable role in delivering health and well being benefits to local communities.
241	15	CH05	Active Swindon is uncertain without further consideration about the re-instatement of the canal.		Noted
104	34	CH05	The public realm strategy offers advice regarding species for various types of route, and experience in developing the design for Wharf Green should also assist the process.	Further considerations of tree type and planting include leaf drop, spread, maintenance, obstruction of CCTV, bird roosting and appropriateness of	This is very detailed advice which is adequately contained with the Central Area Public Realm Strategy and will be further detailed in the emerging Green Infrastructure Strategy
104	33	CH05	It's not clear, in the context of the paragraph at the top of page 44, why Havelock Terrace has been singled out particularly for 'play art'.		As part of a comprehensive new scheme play art would be a welcome addition in this newly created environment and would be more suitable here than in other streets and spaces.
104	36	CH05	The Public Realm Strategy was written at a time when there was no adopted Public Art Strategy. There now is a Central Area Public Art Strategy, which takes art forward in more detail and with a strong creative, sustainable and innovative direction.	It is our view that the artistic illumination discussed on this page is better lead through the Art Strategy than by reference to the Public Realm	Not agreed
104	31	CH05	Within the 'delivery mechanisms' section, there could be an addition which reads, 'The public art strategy for the central area requires that every public art commission demonstrates a commitment to sustainability'.		The Inspector may wish to amend text accordingly
104	37	CH05	The reference to the art strategy is rightly within the public realm section. However, the references to play art are	Consideration should be had to the public art strategy and the abilities and thinking of the Cultural Partnership and	Not agreed

			curious as it is not clear where this idea has come from, or how it is being defined.	inSwindon.	
104	29	CH05	It is accepted that in the quest for a high standard of historic conservation, some of the materials and street furniture in the public realm strategy may not be the best for the Railway	The adopted public realm strategy provides a sound starting point for the treatment of the railway village. A separate public realm scheme would be a waste of time.	Not agreed
104	28	CH05	The Parade should be highlighted as a high priority primary route which incorporates The Garden.		The Parade is dependent on two sizable redevelopment opportunities being delivered. This is reflected in its priority.
104	27	CH05	The purpose of the diagram is unclear. It does not help that the diagram has on it developments that are not yet in place, and each view and aspect is in a different direction or plane.	If the purpose of the diagram is to demonstrate the location of the primary routes, this would be better served as a map.	It is considered that the 3D perspective helps articulate how the space will feel and how they will function in relation to other streets and spaces.
104	26	CH05	Poor public spaces are made worse by the lack of enclosure and lack of active frontage. This again demonstrates the close relationship between good quality public realm and good design standards.		Clearly stated in the AAP
104	25	CH05	It's not clear what is meant by 'recent additions to the highway network'.		The most recent major example is the new road system at Holbrook Way, which was developed in 2000 / 2001.
104	24	CH05	The terminology, 'primary routes' and reference to Level 1 streets and spaces among other terms and nuances, show a strong reliance on the public realm strategy to develop the public realm section in the AAP.	The connection is not explicitly set out and would be lost on those not familiar with the public realm strategy. The connection to, and reliance on, the public realm strategy should be made	The first point in the Development Principles in the Public Realm section refers back to the Public Realm Strategy - it is high profile and explicit. Not clear what the objector means.
104	23	CH05	There are a number of crossovers between the design advice and the public realm section, largely because of the interaction between buildings and the public realm which relies on good standards of design and attention to details.		That is why they overlap in places but each warrant their own detailed section

104	32	CH05	For the avoidance of confusion, Havelock Terrace is currently the eastern part of Havelock Street (between Havelock Square and Regent Street). Havelock Terrace is not its adopted name.		It is not clear why TNSC would object to the name. It originated from work commissioned by them.
80	22	CH05	Policy refers to an area of search for a canal basin but does not approximate the size and form of basin. The text refers to locating the basin within the Fleet Street/Upper Bridge Street area, but the policy also indicates a larger area of search.		The area identified on the Proposals Map shows the extent of the area currently being considered for the basin.
166	14	CH05	SCAN supports the improvements to the railway station frontage, its connection to the town centre via a 'desire line' and plans to make the route more pleasant for pedestrians.		Support noted
166	13	CH05	Under the subheading 'Primary Routes in Central Swindon' SCAN supports the strategies to improve the pedestrian experience and meet the needs of cyclists by provision of secure cycle parking.		Support noted
166	11	CH05	The objectives should include an objective to reduce car domination of the public realm, through reducing congestion and unregulated parking consistent with the Council's aspiration to ensure that 'the car does not dominate...the environment'.		Agree with the statement, which it is considered that the Policies of the Plan will help deliver. However, the statement is considered to be too specific to be included as an additional objective. In any event the statement is already embraced within existing objectives.
92	3	CH05	Although the Plan acknowledges the need for an early review of the canal plans if insufficient progress has been made during the first 2 years we consider the Plan's failure to include any alternative proposals renders it insufficiently flexible.	The Plan should include an acknowledgment that, in the event of any significant delay to the canal proposals, the existing route from Kingshill to Farnsby Street will become increasingly important for pedestrians	Providing alternative proposals would create uncertainty. The 2 years threshold is considered the best approach, giving the Council a 2-year window within which to secure funding and to draw up detailed plans.
80	19	CH05	Support the general principles of this	The policy encourages the use of public	A Town Centre Public Art Strategy has

			policy, but the guidance could be	art, but does not say where or how these areas and identities are defined. It is unclear what routes require street furniture or at least where and how these routes are identified.	been prepared to guide public art provision, which complements the Central Area Public Realm Strategy SPD.
80	20	CH05	The status of the public realm strategy is unclear and whether there has been wide public consultation in its contents and therefore what weight should be attached to it.		The Public Realm Strategy had been adopted as a Supplementary Planning Document, and is therefore a material consideration in the consideration of planning applications in Central Swindon.
92	2	CH05	Given that no plans have yet been published to show how vehicular traffic will be diverted, and no sources of finance for building the canal have been identified, we there must be a strong possibility that the target date of 2016 will not be achieved.		The Canal Implementation Plan will establish detailed timings and funding sources. 2016 (ie 8 years) is a realistic target for delivery - the actual construction phase could be achieved
24	11	CH05	The appearance of some streets is poor. An example is the southern end of Victoria Road. If this road is to feature as a future high quality "public realm" gateway route it must be subject to better design and appearance.		Agreed that this route is in need of substantial improvements.
166	15	CH05	SCAN is keen to be consulted on development of the 'Green Infrastructure Strategy'		Noted
80	23	CH05	The policy could be clearer about how new development is expected to 'positively respond to the canal in its design' - especially if development takes place before the canal's	The above comments would appear to indicate that the proposals for a canal are insufficiently advanced to merit a safeguarding policy.	The statement is included in recognition that development schemes may come forward prior to the canal. The LPA does not wish to hold up development in advance of the canal, but also does not wish for new development to prejudice the delivery of the canal
80	24	CH05	The proposals map should identify specific areas to which it applies. The policy should describe the scale and engineering of proposals for a canal basin and identify a specific area of search on the proposals map for the		A master planning exercise will inform the location and detailed specifications for the basin.

			basin		
80	25	CH05	The plan should describe how canal proposals will be progressed and the timescales for critical decisions.		A canal implementation plan is being prepared which will address timing issues.
92	1	CH05	The old canal route from Kingshill to the Town Centre is an important pedestrian route, use of which is likely to increase when West Wichel is developed. The existing underpass at Farnsby Street is dark & depressing & many people find it intimidating.	The route should be designated as a gateway and a commitment should be made to improve the route by re-designing it to remove the unpleasant underpass.	The old canal route provides a functional route into the centre for cyclists and pedestrians and is not in real need of improvement. The improvements to Wharf Green will improve perceptions of safety in the wider area, including the
104	40	CH05	The priority section – Regent Place and Canal Walk completion by 2011 and the remainder by 2016 – doesn't appear to tally with the descriptions and expectations on pg 33. Also, Regent Place appears to be a mistake – should this be Regent Street?	To reflect changes in respect of the public art references, The New Swindon Company, inSwindon and the Council should include references to their role in respect of public art.	Pg 45 reference to Regent Place should be Regent Street.
104	39	CH05	It is unclear whether it is just live performance art, or all events, that should be co-ordinated through inSwindon. Further, inSwindon are just one element of art and performance, and their 'co-ordinating' role needs understanding much further.	Reconsideration of the first paragraph on page 44 is sought.	Not agreed
104	38	CH05	In order to strengthen the focus on public art, and make its delivery clearer within the plan, I would suggest that further text be added (example text	The last sentence in the paragraph (New public art in Swindon...) should be deleted.	Not agreed
80	21	CH05	The policy safeguards land from development which may prejudice the possibility of a new canal. The land to which this policy applies should therefore be shown precisely and not		The bulk of the safeguarded land is in Council ownership. A Master Plan for the upper Bridge St/Fleet St area is being prepared, which will show the actual location of the basin. The route of the canal through Shire Court/Erin Court will be finalised at the design stage of redevelopment scheme for the area.
129	4	CH05	Environmental concerns are highlighted,		The Action Plan identifies the need for the

			leptospirosis and other water borne diseases, water quality etc from the proposed canal.	final canal scheme to be accompanied by a maintenance plan, which would address these issues.
340	1	CH05	Support canal - good for area and will bring tourists.	Support noted.
314	4	CH05	Supports inclusion of text in Policy 4 that confirms that an implementation plan will set a delivery framework that minimises disruption to local residents and traders during the construction phase and also provide the opportunity for early review of the Canal allocation if work is not progressed within the specified timescales. Notes that Policy 4 states that 'Development should not prejudice the delivery of the canal and where practicable should respond positively to the canal in its design.	Support noted
314	2	CH05	Rebranding of The Parade - 'The Garden' Notes the Council's intention to re-name The Parade area, 'The Garden'. Object to this renaming and strongly urges that the Council maintains the name 'The Parade'. Is concerned that the name 'The Garden' does not indicate to shoppers that this is a wholly retail area and a destination shopping area with anchor stores such as Debenhams and BHS. Therefore, wish to protect its interest in this respect.	'The Garden' is the public space not the wider Parade Area and does not include the shops.
265	3	CH05	Public realm section of strategy is in some respects most important part of policy. The other sections of the strategy policy in their own right are important but if the public realm is not of very high quality, then all the benefits of the strategy can be lost. Public realm strategies/policies	Support noted.

			ambitious in aims but credible. There are robust mechanisms for implementation and monitoring. Policies flexible enough to very creditable outcomes. If all aspects of public realm section is carried out then the strategy will have a lasting and satisfactory impact of the development of central Swindon.	
333	4	CH05	Public signage in Old Town poor, especially directing potential shoppers to Godwin Court core area car park. Good signage to car park essential as surrounded by high buildings. Other signs directing people to Old Town could also be improved, especially with new populations of North and West Swindon.	Noted. A Wayfinding Strategy developed by the Council has resulted in new signage and wayfinding monoliths being rolled out across the town centre in Spring/Summer of 2008. In time, given the AAPs acknowledgement of the important role of Old Town as it relates to the Town Centre there may be scope to continue this programme in Old Town.
129	10	CH05	Understand costings not complete and business may not wish or be able to contribute in the present economic climate. British Waterways have withdrawn financial support for the progress of canals in the Cotswolds and the prospect of the Swindon Canal joining the Thames must be more uncertain. Request any promotion of the scheme by you clearly states the weaknesses as well as the strengths so that a proper debate and decision can be made on the outcome. Disadvantages appear to outweigh the advantages for the whole of the Borough and unfortunate residents along the proposed route.	The Halcrow Canal Feasibility Study provides an objective account of the benefits and weaknesses of the canal proposals, and identifies the challenges that lie ahead. It is recognised that the proposals are ambitious and that delivery will be challenging, but the Council considers that the benefits will significantly outweigh the costs involved.
129	9	CH05	Transport concerns with closure of main route from junction 16 of the M4. Access to the retail sector from the west would be difficult and during construction would be a real disincentive to visiting the town centre. Chester, Theobald and Maxwell streets	The Halcrow Canal Feasibility Study concludes that the transport network can accommodate the closure of Westcott Place / Faringdon Road as a traffic route into the Town Centre. The impact of the canal is being further considered in detail by a Borough-wide Transport Study.

			and Cambria Bridge Road access the canal road network at Faringdon road. Revised traffic management would be needed for these road to retain access changing from a one way system thereby losing resident's parking, already in short supply.		
129	8	CH05	The carbon footprint of the area will be increased by the canal, hardly an improvement to the environment.		The carbon footprint would be greatly lowered by removing a busy through road and replacing it with a canal.
129	7	CH05	The Halcrow study states the difficulties of canal construction in such a restricted space and that pollution, vibration, mud, dust and noise will be		The potential difficulties associated with the canal construction are recognised in the CAAP text, which notes that the concerns of traders and residents should be addressed in the detailed design of the scheme.
314	6	CH05	<p>Council's response to previous representation to the AAP set out in the 'Summary of Responses to the Preferred Options Paper' state that 'Given that the canal will not be delivered in the shorter tem and given that the Council would not wish to hold up the wider regeneration of the Retail Core, the wording in the Submissions Draft will be altered to allow a scheme to come forward to redevelop the Parade area prior to the canal scheme.'</p> <p>The Council also stated in its response that 'Given the major development constraints that exist in the Fleet Street area, the area's regeneration will need to be comprehensively master planned. A Master Plan for the area will therefore be prepared as a matter of priority. This Master Planning approach will allow individual schemes to come forward in the area, in advance of the canal and basin, provided they accord with the principles of the Master Plan.'</p>	Can see reference to masterplanning in the Submission version but considers the wording should explicitly reflect the Council's response to our Preferred Options representations.	It is considered that the Submission Draft text does reflect the wording in the Council's response to this Preferred Options representation. The fifth para of Page 72 applies and states, "Given the major development constraints that exist in the Upper Bridge Street / Fleet Street area, the area's regeneration will need comprehensively master planning. A master plan for the area will therefore be prepared as a matter of priority. This master planning approach will allow individual schemes to come forward in the area, in advance of the canal and basin ..."

129	5	CH05	Green space could be lost in the GWR Park along with trees to the detriment of the area.		The public realm section notes the Council's intentions to protect and enhance Faringdon Park and identifies it as one of the towns most important green spaces. It does not follow that we would seek to remove it or remove trees.
314	8	CH05	Reference in Policy 4 to submission version of the Proposals Map should include some commentary on the need for consultation on the Council's masterplanning exercise for the canal as there are a number of affected		Page 52 "Quality Assurance" notes that there will be full consultation with affected communities / businesses on the detailed design scheme and implementation plan.
129	3	CH05	Page 76 of the Halcrow Plan states maintenance costs are in the regions of £30k per mile and for the proposed canal likely to be slightly higher than		An Implementation Plan would be required to be submitted as part of any canal planning application.
129	2	CH05	Do not think Swindon has a large enough population to support a canal scheme. In Halcrow Central Canal Route Study, unable to identify funding, significant ongoing maintenance/management costs (to public sector)? Who will own and operate the canal and to page 14 of the Central Area Action Plan Part III 'all dwellings are required to make a contribution.'		A maintenance plan would be required to be submitted as part of any canal planning application.  Ultimately the canal could be owned and maintained by British Waterways.  Page 14 refers to new residential development and would not require existing dwellings to make a contribution.
343	1	CH05	I love the canal, but don't like that it will go through Faringdon Road, but like that it goes through Mannington Barnfield. Because if it goes through Faringdon Road it will be a disaster for Railway Village people particularly.		The Mannington Route poses a number of difficulties related to wildlife conservation and such a route would not create a the 'wow' factor that a canal through Central Swindon would generate.  Good site management would reduce amenity impacts during construction to a minimum.
108	8	CH05	Objection to the proposed canal route on the following grounds: Removal of private car traffic form the	More evidence that a sound traffic policy exists before the proposal for the road closure form the west can be	The Halcrow Canal Feasibility Study includes a transport model which concludes that there will be greater

			<p>town centre would need a corresponding growth in public transport and more commercial traffic serving the shopping areas from Junction 16 to the west. The existing road network will have difficulty in accommodating this increase and there are doubts that the transport issues at Kingshill Gateway can be resolved.</p> <p>Canal route through town bisects the wildlife corridor. Many houses in the vicinity of the canal are rented and leased thus the implementation of the canal will increase rent leading to the displacement of a currently fairly well integrated community. Economic pressure for the canal to create produce a 'wow' factor.</p>	<p>supported.</p> <p>The alternate by-pass route and lineal park suggestion would better protect the wild life corridor and residents living in the vicinity of the canal route. Further and more in-depth consultation of existing residents who would be affected by the canal is required before support for the canal can be given. Basin will be better served by a spur from the North connecting the alternative canal by-pass route.</p>	<p>vehicular movements along Great Western Way and Kingshill Road. A Borough-wide Transport Study is in preparation which will consider further the wider transport implications of the canal and will provide recommendations as to how any adverse impacts of the canal on the transport network can be mitigated.</p> <p>The canal would bring significant benefits to traders (greater pedestrian movement) and residential areas (health and well being benefits) along its route.</p> <p>There will be further in-depth consultation with traders and residents as the detailed designs for the canal scheme are worked up.</p>
108	7	CH05	Faringdon Road, Green Spine.	<p>Opportunity exists to turn this into a lineal park leading into GWR Park through existing gateways. Certainly a traffic free area would be of beneficial to the residential population and general greening of the town. This work should be carried out as soon as the traffic issues are resolved, and not wait for the canal.</p>	<p>The Plan identifies the need to improve linkages between the GWR Park and the Town Centre as denoted on the map at Page 38 of the Action Plan. A canal would be a highly effective way to achieve this aim.</p>
108	6	CH05	Areas outside pubs, especially popular concentrations need improved lighting at night and be provided with sound methods of dispersing 'revellers' with the least disturbance to residential neighbourhoods.	<p>Consideration of these nighttime issues is being given by the Council's licensing department and civic trust. The project is called 'Night Vision', and its findings and recommendations should be included in the Public Realm</p>	<p>Noted</p>
108	5	CH05	The Railway Village - The introduction of a bus priority route along Oxford Street needs re-evaluation. This section of the route only serves one lightly used bus stop and will encroach on a quite, narrow residential street seriously affecting the existing residents quality	<p>Propose a different route.</p>	<p>Noted. Your comments will be forwarded to Transport Planning for consideration in the development of the Swindon Transport Study which should be completed early 2009.</p>

108	4	CH05	Gateways, page 30 It is not clear in the document how the 'Gateway at Kingshill' will serve vehicular traffic	A clear statement of intent is required.	This gateway would denote the entrance point into Central Swindon, and would present a more attractive entry than presently exists.
342	1	CH05	In principle, canal seems like good idea for area.		Support noted.
129	6	CH05	The risk of flooding is likely to increase as a result of the canal.		The Halcrow Canal Feasibility Study concludes that the canal is likely to reduce flood risk not increase the risk.
351	3	CH05	We do not think it is a good idea to pedestrianise Wood St. Experience has shown in other towns and cities that pedestrianisation often leads to the takings dropping off in local shops.	It would be better to try and incorporate parking and café society in a more imaginative way for example by adjusting the parking to be outside the shops and widening the pavements where there are cafes.	Agreed. The priorities for Wood Street are to enhance the environment for all highway users, including pedestrians. The Inspector may wish to remove the specific reference to pedestrianisation and retain the other text which relates to flexibility and enhanced public realm.
4	7	CH05	Supports public realm proposals under 'Primary Routes in Central Swindon' that facilitate enhanced pedestrian and cyclist experiences as well as reducing on-street parking as at Wood Street. These measures will encourage shifts to non car travel.		Support noted
4	6	CH05	The canal proposal is supported as it will change the character of Westcott Place from vehicular access to waterway with parallel pedestrian and cycle route, thus promoting sustainable		Support noted
4	5	CH05	Welcome the identification of the Railway Station and Bus Exchange as important gateways, the central location of the bus exchange in the town centre will encourage greater bus use.		Support noted.
345	1	CH05	Yet again SBC is totally ignoring local heritage and ploughing ahead with a new totally useless canal going right through an historic residential area. Total rubbish use of resources. Very		Objection noted.

			disappointing.		
344	1	CH05	Canal = good idea.		Support noted.
248	1	CH05	It is our contention that the need for a Canal and the designation of the Kingshill Gateway is unsound. There appears to be no evidence base that a canal is either required or desired by the residents of Swindon. The physical implementation of such a canal is difficult and no solid funding base is in place. It is therefore unreasonable to allow policy context that dictates to future development within this area to respond to the possibility of a canal.	It should be removed.	<p>There are many benefits that a canal can bring, including health and well-being benefits for residential areas along the route.</p> <p>There has been both positive and negative comments about the canal proposals raising during consultation on the Action Plan. Wider consultation undertaken to inform the Sustainable Community Strategy has shown widespread support for bringing back the canal.</p> <p>An Implementation Plan is being prepared which will cover financing issues.</p>
241	14	CH05	Under Policy 3, requirements from developments adjacent to the green spine are listed. Given the importance of the Green Spine for pedestrian and cycle transport, there should be special requirements for these developments to accommodate and indeed promote sustainable transport. For example in addition to cycle parking facilities, secure storage/drying space for helmets, panniers and outdoor gear should be provided (e.g. cloakrooms).		As noted at Policy 5, all development proposals will be required to produce Travel Plans, which will be expected to address such matters.
241	12	CH05	Active Swindon suggests that the Green Spine is extended approx. 100m further along Devizes Road to the Old Town Railway Path. This minor extension would bring significant added benefits, by connecting the Green Spine directly to the National Cycle Network Route 45, Old Town Gardens and the Canal. It would also encourage foot-fall (i.e. shoppers) to the old-town shops along		Noted. This would be dependent on feasibility.

			Devizes road and Newport Street. A Green link to the Lawns could also be made via Wood Street or Devizes Road. This extension is highly feasible, since these stretches of road are already earmarked for bus prioritisation or pedestrianisation.		
241	11	CH05	While Active Swindon welcomes the creation of bus lanes, cycle lanes and improved pedestrian facilities along these routes, the CAAP does not say how the impact on car-traffic will be managed. There should be accompanying strategies to reduce car traffic along these routes (e.g. through provision and promotion of		These issues are considered in greater detail in the Local Transport Plan.
314	5	CH05	Possibility that routing the canal along Fleet Street area would jeopardise the existing and future servicing to both The Parade and other retailers. Urge Council to carefully consider the practicality of delivering the section of the canal which is proposed to follow the route along Fleet Street and the negative impacts this could have on		The Halcrow Canal Feasibility Study shows how service access can be retained for traders in the upper Bridge Street / Fleet Street area. A more pressing concern for service access to any redevelopment of The Parade is the impact of the proposed Green Spine and the downgrading of Fleming Way. The Council intends to Master Plan the redevelopment of this area to ensure that its redevelopment properly considers how it would work alongside the Green Spine, Union Square and canal proposals.
351	4	CH05	We welcome the idea of putting the canal back into Swindon but this needs to be done with great care. Canals and town centres need careful management.	I think it would be better to take the canal around Swindon so that it can be incorporated into anti flooding work.	Such an approach would not generate the wow factor that a canal through the built up area of Central Swindon would create.
314	7	CH05	Use of the wording 'safeguarding' of the proposed canal route at the beginning of the policy text is very strong policy wording in the context of the uncertainty of the feasibility of the proposal. 'Safeguarding' implies a blanket policy across the area, which		Where major new development is proposed the Council is pursuing a master planning approach which will allow development to come forward in advance of the canal provided that it does not prejudice the delivery of the canal. This approach promotes flexibility as a master

			could frustrate other opportunities. Consider that the policy should be flexible to react to changing circumstances, particularly given the costs and uncertainty associated with its delivery. Use of a safeguarding policy should not be used until a review of the canal allocation is the AAP takes place when the design and implementation plan are further advanced.		plan can be updated more readily than an allocation in the Action Plan.  Further the safeguarding approach, whereby the canal is safeguarded in an adopted DPD will open up the possibility of securing funding from a wider range of sources than if the canal was not safeguarded. Therefore the safeguarding of the route is an important stage, that needs to be in place, in advance of the finalisation of the Implementation Plan.
351	2	CH05	Welcome the ideas of improving the road link between Old and New town. It is an excellent idea to link Old and New town by a pedestrian and cycle link.		Support noted.
339	2	CH05	Green Spine - This route exist in part without motor vehicles and in part on carriageway, for it to "provide a continuous pedestrian and cycle link" will need require extensive and appropriate re-engineering.		The vision of the Green Spine will be realised through in depth engagement with our Transport team and innovative design solutions to ensure no modes of transport are prejudiced by its delivery while at the same time pedestrians and cyclists are made a priority where
339	1	CH05	Development strategy: Gateways - Presently developed for motor vehicles, they will need careful and appropriate re-engineering for greater cycling and pedestrian usage including their approaches.		Agreed
293	1	CH05	As Manchester Rd. is a Major Local Centre, with many pedestrians using it, it should be protected from becoming more widely used as a through route for traffic, it will not only become dangerous for pedestrians but if it becomes a major route into and out of the town centre, it will also split the Broadgreen Area into 2 halves. At the moment vehicles cannot enter it from the northern end of County Road, as it is a bus lane only. Traffic will also use	To give a stronger message and protect the streets of Broadgreen from becoming a rat run, the BSACC request that the first line be altered to: 'Manchester Road should not' become a more widely used vehicular route once Fleming Way is downgraded to bus only with limited evening access for private vehicles 'and the Broadgreen area should be protected from additional traffic using the area as a 'rat run'.	There are no proposals to remove the restrictions on access into the Broad Street area from County Road. No significant increases in vehicular movements through the area are envisaged.  The third para of Page 110 of the Plan states that "Changes to the road system as a result of regeneration or the proposed reinstatement of the Canal should not compromise the residential

other roads in the Broadgreen area as a cut through.

amenity of Central Swindon's residential

270	4	CH05	No basis is given for the statement 'In the Town Centre buildings should be built adjacent to the pavement.' and it is not mentioned in Swindon's Central Area Public Realm Strategy. Whilst this should be the norm, it may be appropriate for certain buildings, based on their intended use, for an active frontage to be set back to reduce its interaction with the public realm.	Add statement that, in exceptional cases, it may be appropriate for certain buildings, based on their intended use, to have an active frontage set back from the pavement to reduce its interaction with the public realm.	This approach is contained within the Swindon Central Area Public Realm Strategy and it isn't agreed that setback is warranted for any use. All uses can engage with the public realm.
337	5	CH05	Swindon Community Strategy unreliable, as it has just been published and the canal project was used as a cover without justification. Trust blocked from involvement in the	Canal priority should be readdressed with the agenda being investigated by the Regional Planning Authority. Resistance to the issue of the Mechanics' Institute needs to be explored. Real opportunity to re-introduce a social and physical heart lies within the Heritage Area.	This is beyond the scope of the Central Area Action Plan.
252	5	CH05	Welcome the major public realm improvements (Policy3) which accords with the key infrastructure requirements for Swindon listed under para. 4.2.31 in the draft RSS.		Support noted
314	9	CH05	Considers shorter term deliverable regeneration developments, should be given equal importance to Swindon, as the longer term aspiration for a canal. Will demonstrate in application for the extension to The Parade that the scheme will not inhibit the ability to bring forward the canal in the longer term. As such, advise that the canal and future developments can be complementary through ensuring in policy terms that the delivery of one does not jeopardise delivery of the other.		Noted. In is considered that the Action Plan allows for such an approach.
241	9	CH05	Active Swindon is keen to be consulted on development of the 'Green Infrastructure Strategy'		Active Swindon are already part of the team helping to shape the Green Infrastructure Strategy

355	1	CH05	Support for plans and especially the canal, which would give Swindon a “wow” factor and would help reduce traffic problems along Westcott Place.		Support noted
34	2	CH05	Pleased to be identified as a key player for Policy 4 - the reinstatement of the canal. We re-iterate the importance of involving us in the master planning of this project due to the implications for water quality, water resources and biodiversity opportunities.		Noted
336	1	CH05	The deliverability of the Canal proposal compromised by vague economic viability, the downturn in national economy, shortfall in Lottery target takings and British Waterways’ decision to withdraw from the Cotswold Canal Partnership. These concerns are reflected in the Practical Difficulties highlighted in The Canal Feasibility Study Review.		The Action Plan commitments the Council to preparing an Implementation Plan, which will deal with financing in detail.
192	1	CH05	Westcott Place Canal route will have severe traffic implications.	If Westcott route is adopted, introduce an interchange where people leave cars and use public transport, take foot or cycle. Abandon Canal route through Fleet Street. Encourage alternative route along River Ray either, through Coate Water and along River Cole or East through Wanborough/Swindon. Link North Wilts Canal to Wiltshire and Berkshire Canal near Rushey Platt and run spur onto original Canal line to create a Regents Place/Wharf Green Marina focus.	The Halcrow Canal Feasibility Study concludes that the transport network can accommodate the closure of Westcott Place / Faringdon Road as a traffic route into the Town Centre. The impact of the canal is being further considered in detail by a Boroughwide Transport Study.  The wider canal routing suggestions will be considered as part of the Core Strategy consultation.
129	1	CH05	Objection to the proposed route of Canal on grounds of: Costs outweighing benefits, with excessive costs compromising canal build quality; canal not on existing route making fund raising difficult; increased		Transport implications of the canal on the highway network are being considered by Borough-wide Transport Study. Access to Town Centre and properties on route are considered by the Halcrow Canal Feasibility Study. The Halcrow Study

			congestion near Railway Village, Old Town, Crombey Street, Great Western Way and impact on retail viability of Town Centre; access to car parks, properties en route and existing routes will be limited; timescale of Town Centre rebuilding will be affected; requirement for large scale maintenance; uncertain costs; lack of support from residents; canal ownership issues; proposed area on floodplain, flood risk issues due to climate change; possible damage during construction to Victorian property foundations; adverse affects to World Heritage application; overshadows improvements to Railway Village and Mechanics Institute and reinstatement of Railway Village Community Centre; lack of consideration and funds for needs and concerns of residents in the area; lack of consideration of years of neglect of Town Centre; lack of consultation with residents living on proposed route.		concludes that the Canal will reduce Flood Risk not exacerbate it. The canal would benefit not detract from the Railway Village Conservation Area. Residents have been consulted. Consultation will continue as the canal scheme progresses towards detailed design.
192	2	CH05	Section 5: Restoration of the Old Town Gardens Bowl does not provide weather protection for functions and events.	To provide improved weather protection and sound insulation for surrounding residents Scope exists for Private / Public collaboration to create a skeletal arch or frame structure which could be clad when events are in progress.	The Plan does not preclude sensitive solutions to make the Bowl available year round.
270	6	CH05	The wording of the Action Plan describes the canal basin as being in the Fleet Street/Upper Bridge Street area (D4), but the map shows it as in the Station car park and industrial estate area (D7). This would appear to	Correct error on the map so the location shown for the canal basin matches that described in the text.	This happened as a result of formatting the proposals map for electronic website access. This has been rectified and the Proposals Map is now correct.
211	2	CH05	Propose to make significant investment to the improvement of the public realm within the central area and will be seeking to work with the local community and key stakeholders to achieve this. Support the objective and		Noted

			content of Policy 3.		
270	5	CH05	There is no basis for the comment 'Tree planting can be enhanced by the inclusion of uplighters. Uplighting of trees should therefore be considered where possible.'	These two sentences should be removed.	The Inspector may wish to remove the second sentence but it is considered the first sentence is a desirable objective to promote the greenery of our inner urban area.
347	1	CH05	Budget and timeframe concerns. Project is intrusive. Flood risk. Major disruption to traffic and utilities. Compensation issues. Vibration damage to Victorian house foundations during canal construction. Taunton Street access for emergency services and private vehicles		Development of the Westcott Place / Faringdon Road stretch of the canal could be delivered inside of a 2-year period. Good site management would reduce amenity impacts during construction to a minimum.  The Halcrow Canal Feasibility Study notes that canals can act as a flood mitigation measure and so can reduce flood risk.  The Halcrow Study sets out how emergency / service access to properties can be retained.
346	1	CH05	The total disruption of traffic that the canal would cause, carrying on for at least 5/6 years (having to live in a building site for this time).  Increase in carbon footprint, due to the removal of the mature trees at the southern edge of the GWR Park and of the removal of the 4 large Maple trees in Faringdon Road/Taunton Street.  Improvements in the area would not be felt for at least 15/20 year, if ever.		Development of the Westcott Place / Faringdon Road stretch of the canal could be delivered inside of a 2-year period. Good site management would reduce amenity impacts during construction to a minimum. Benefits would be felt straight away for local residents through the closure of the busy through road at Westcott Place / Faringdon Road.  The Halcrow Canal Feasibility Study concludes that the transport network can accommodate the closure of Westcott Place / Faringdon Road as a traffic route into the Town Centre. The impact of the canal is being further considered in detail by a Boroughwide Transport Study.  The Carbon Footprint of the area would be greatly reduced by the removal of the

					busy road and its replacement with a canal. Biodiversity opportunities will be a requirement of the canal scheme as noted by Policy 4.
166	29	CH06	Welcome the plans to improve pedestrian and cycle provisions. Agree that they must be direct, well-defined, well-lit, continuous and connected to key destinations in order to be well used. Connectivity across the Town Centre is currently very poor.	This barrier to cross-town commuting should be addressed.	Support noted.
24	25	CH06	A location for shopmobility near the bus exchange in Fleming Way would be appropriate.		Noted.
241	3	CH06	Walking and cycling needs to be considered first, public transport second and car usage last if we are to halt our rising obesity levels. The major stakeholders need to lead by example.	The Transport and Movement Principle needs to be replaced by a principle to 'deliver a modal shift to sustainable travel modes'.	The principle of modal-shift is embodied within the Transport Policies, with emphasis being placed on improving access into and around the centre by foot, cycle and public transport.
351	5	CH06	We welcome the idea of encouraging people to use public transport and would like to see more park and ride schemes. In our area of Old Town the air quality is often poor because of the pollution caused by queuing traffic.	We would like consideration also give to bus routes that cross the town starting in residential areas and ending in shopping areas or areas of employment. Could we also make a plea for larger employers to encourage	Noted.
14	4	CH06	The provision of car parks should take into account a 50% area for disabled and elderly drivers and flexibility to convert some of the area in the future when need drops.		Within all new car parks and refurbished car parks, provision will need to be made for disabled parking in accordance with the Council's adapted Parking Standards and 'Access for All'.
166	33	CH06	As outlined in the DfT Policy Paper "Towards a Sustainable Transport System: Supporting Economic Growth in a Low Carbon World" Transport Demonstration Towns have proved that travel marketing is a good way to deliver a modal shift.	The developer contributions should also be applied for significant marketing and promotion of sustainable transport (in addition to infrastructure).	Noted. Your comments will be forwarded on to Transport Planning.
166	32	CH06	The Council expects that the bulk of	We strongly urge that the Council also	Noted agreed, other funding sources are

			<p>funding will be from developer contributions.</p>	<p>takes the opportunity to seek substantial government funding that is available for sustainable transport initiatives. E.g. Cycle Demonstration Town Bid, or Transport Innovation Fund</p>	<p>actively being pursued. The actual initiative suggested will be forwarded to the Transport Planning Section of the</p>
339	5	CH06	<p>Crossing the railway west to east: Bruce St, Faringdon Rd, Whitehouse Rd, Transfer and bridge End Lane/Swindon Rd and Ermin street. For central town to North Star/Outlet, Steam and potential University Campus site new crossings are going to be needed. The current Outlet Village crossing is pedestrian only, leaving only one cycle able crossing between two busy motor vehicles gateways - The Oasis underpass often poorly lit and not secure. A greater balance of pedestrian and cycle crossing should be developed.</p>		<p>The existing cycle route through the underpass will be significantly improved, which should make it more pleasant and secure.</p> <p>The detail design of the new crossing linking North Star with the Town Centre has not been agreed. This could potentially encompass both pedestrian and cycle crossing.</p>
339	4	CH06	<p>Current cycle parking infrastructure consists of acceptable 'Sheffield stands' too few in number and location, combined with less than optimal parking equipment from front wheel only 'butterfly clamps' to the Regents Street art piece which places cycles to close together and often retains water following rain which continues to drip onto the bikes for several days later. The latest standards and design placing cycles at a minimum of 1000mm centres can only be accepted.</p>		<p>Ample secure cycle parking is essential and will be consolidated at strategic locations throughout the Town Centre. These will be complemented by a general provision of small cycle parking facilities conveniently located throughout the Town Centre. Secure bicycle parking locations have been identified at Fleet Street, the new Central Library, within the Brunel West car park and within Union Square.</p> <p>Development Control Guidance Note: Technical Guidance on Parking Standards (December 2007) sets out requirements for cyclists and cycle parking standards.</p>
339	3	CH06	<p>The minimum standards for design and development must be upheld, with European studies researched to ensure maximum incentivisation from cars to walking and cycling. Indeed the creation of new standards and values could be</p>		<p>The principle of modal-shift is embodied within the Transport Policies, with emphasis being placed on improving access into and around the centre by foot, cycle and public transport.</p>

			ours to demonstrate. Compromise as is evident in the borough is often highlighted through lack of stakeholder usage i.e. cycle lanes at the Magic Roundabout.		
24	20	CH06	If the "unrestrained use of the car" is to be tackled the following drastic measures should be considered	Prohibit cars with only a driver from entering the town centre unless they have a special priority, ban all cars from the town centre, a congestion charge, "Travelsmart" or sharing	The Planning framework in the Action Plan would not rule out such measures. Suggestions to be forwarded to Transport Planning Section for consideration in the development of the Swindon Transport Vision 2030.
166	30	CH06	Support the plan to improve cycle linkages to rural areas.	Suggest that buses be fitted with cycle-racks, to facilitate easy access to rural cycle networks for both commuter and leisure users. (In the USA 1/3 buses are fitted with cycle racks. Sportsworks are looking for EU pilot cities. Why not Swindon?)	Noted. Thamesdown Transport is responsible for the bus service within Swindon and we will forward your comments on cycle-racks on to them.
24	22	CH06	Fleming Way should be available for taxis.		Noted, the final design specification for the reconfigured Fleming Way has not yet been agreed. Access for taxis is being considered.
80	11	CH06	The thrust of the transport elements of the plan seem in-line with government policy. We support the objective of creating safe, convenient, user-friendly and attractive routes into and around the central area.		Noted.
80	12	CH06	The plan does not articulate an overall strategy for transport and establish how redevelopment proposals integrate with transport planning for the central area, the rest of Swindon and the wider catchment.		An overall, Borough Transport Strategy is in preparation. The Transport Policies in the Central Area Action Plan have been drafted in a flexible manner so that they will be able to help deliver the recommendations of the Transport Strategy.
166	28	CH06	SCAN welcomes the plans for a high quality and well-located bus exchange. Every effort must be made for a building that is user-friendly and		Noted.

16	4	CH06	It is not clear how the bus and cycle lanes will work at peak periods and who gets priority? Will shared routes be safe? Where are the rail crossings for buses? This should be referenced.		In designated bus/cycle/motorcycle lanes, there is shared priority. Your further comments have been noted and will be forwarded to Transport Planning for consideration in the development of the Swindon Transport Study which should be completed early 2009.
166	27	CH06	p.55 states that 'Central Swindon currently benefits from an excellent bus network, which links into the centre from surrounding areas'.	The bus network is extremely poor in evenings and weekends, and to rural routes, and it must be a priority to improve these.	Thamesdown Transport is responsible for the bus service within Swindon. Your comments have been noted and will be forwarded on to Thamesdown Transport.
252	10	CH06	Note the envisaged provision of car parking spaces to the north of the railway line as outlined in Policy 9. Draw your attention to draft RSS Policy TR1, which emphasises the need to introduce demand management measures in the SSCT's accompanied by a step change in the prioritisation of public transport provision.		The principle of modal-shift is embodied within the Transport Policies, with emphasis being placed on improving access into and around the centre by foot, cycle and public transport. However, it would be wrong not to plan for private transport. The parking strategy for Central Swindon is intended to reduce circulating traffic by siting car parks at strategic locations at access points into
166	26	CH06	The plans to increase car-parking provision (and therefore car-trips) by 50% will prevent many other sustainability goals of the CAAP (and other SBC Strategies) from being achieved.	The plans to increase car-parking provision by 50% should be reversed and replaced with a strategy to reinvest these funds in delivering a modal shift towards public transport.	Whilst the overall number of parking spaces will increase, they will not increase at to the same extent of new development proposed. New commercial/retail/leisure floorspace in the centre will increase by nearly 50%, whereas the number of parking spaces in the centre will increase by only 25% (from 6,000 to 8,000 spaces). Given the limited increase in parking spaces there will therefore be a need for modal shift.
80	26	CH06	We do not consider that this policy adds value to the plan and could be	It would be more helpful for the plan to summarise the strategy for the central area transport network and provide context and priorities for the delivery of transport-related schemes and for area based policies.	Policy 5 sets the context for the Central Swindon Transport and Movement Strategy, and by showing the linkages between the Action Plan and wider Transport Strategies is a useful reference point for the general public.
80	27	CH06	We do not consider that this policy		Policy 6 will add weight to the LPA's

			adds value to the plan and could be		negotiations to secure traffic management measures as part of major development proposals.
80	28	CH06	This policy contains a proposal for a new bus exchange to the western end of Fleming Way but the proposals map only shows an area of search, indicating that the proposal is not sufficiently advanced to be certain whether and how it can be delivered.	The transport section of the plan should establish the justification for this location for a bus exchange by explaining how it fits with transport strategy and the plan objectives.	Details specifications for the bus exchange, together with its exact location, will be confirmed within the final Union Sq scheme. The area of search provides flexibility and does not unnecessarily constrain the options for the Union Square scheme - quite the opposite in fact.
80	29	CH06	The area of search is shown to include a part of area D6 which is subject to policy 14.	The policy should describe the likely scale and form of proposals for a bus exchange, how and when it is hoped to select a specific site and how it is expected to be delivered. The plan should safeguard a specific area for the bus exchange.	Details specifications for the bus exchange, together with its exact location, will be confirmed within the final Union Sq scheme. The area of search provides flexibility and does not unnecessarily constrain the options for the Union Square scheme.
80	30	CH06	The plan should explain the process for how a cycle network will be defined - if it does not form a part of the Town Centre Strategy or the Area Action	It should if possible form a proposal of the plan - particularly if individual redevelopment schemes are being expected to contribute in some way towards its construction.	The cycle network (existing and proposed) is defined in the Local Transport Plan, which will inform when individual development schemes will be expected to provide for new routes.
166	31	CH06	Support the requirement for development to include appropriate cycle parking facilities.	In addition, any development where people are to spend more than a few minutes should be required to provide secure space (e.g. cloakroom) for cyclists and pedestrians to store and dry things like helmets, panniers and outer-garments.	Noted. Ample secure cycle parking is essential and will be consolidated at strategic locations throughout the Town Centre. These will be complemented by a general provision of small cycle parking facilities conveniently located throughout the Town Centre.
241	21	CH06	We support the plan to improve cycle linkages to rural areas and would support SCAN's suggestion to investigate fitting buses with cycle rack to facilitate easy access to rural cycle networks for both commuter and leisure users.		Support noted.
4	14	CH06	Welcomes intention to enhance accessibility of the railway station. Agree this will encourage further		Support noted.

			business and leisure traffic to use rail as a mode of travel. Welcome proposed enhancement of railway crossing to better link parts of central area - in particular the pedestrian and cycleway links as part of the 'Green	
4	13	CH06	<p>Welcomes Council's intention to consolidate number of car parks within the town centre. Support proposed strategic car park to the north of the railway. Object to proposed increase in overall parking spaces in the Central Area and would expect to see shift in balance from long to short stay spaces to discourage commuting by car.</p> <p>Where needs of commuters cannot be met by public transport we support the expansion of Park &amp; Ride facilities at appropriate locations. Wish to see a combination of reviewing the location and use of existing levels of parking provision, with enhancements to public transport, cycling and pedestrian facilities, rather than increasing car parking levels to promote sustainable transport and movement strategy.</p>	<p>Whilst the overall number of parking spaces will increase, they will not increase at to the same extent of new development proposed. New commercial/retail/leisure floorspace in the centre will increase by nearly 50%, whereas the number of parking spaces in the centre will increase by only 25% (from 6,000 to 8,000 spaces). Given the limited increase in parking spaces there will therefore be a need for modal shift.</p>
4	12	CH06	<p>Welcome emphasis on promoting use of public transport, integration of bus exchange and railway station and provision of smaller bus interchanges. As previously indicated, additional commitment is required to ensure accessible public transport links between central area and periphery, where significant additional development proposed to achieve modal shift to sustainable travel options.</p>	<p>Wider linkages between the central area and the periphery will be considered by a Borough-wide transport study carried being prepared.</p>
4	11	CH06	<p>Supports the concept of an Urban Management Control System funded by developers as a means of easing traffic flow. Concerns if this would</p>	<p>Noted.</p>

			mean contributions toward public transport, cycling or pedestrian infrastructure are reduced.	
4	10	CH06	We support the reference in Policy 5, that all developments will be required to produce a Travel Plan. However suggest sentence is changed to '... all developments that meet the thresholds set out in the Guidance for Transport Assessment (GTA) should be required to produce wither a Transport Statement (TS) or Transport Assessment (TA) and Travel Plan (TP) as appropriate.' It is important that such an evidence base in support of development proposal is produced early in the planning process, rather than at application stage, to ensure that the Plan can be delivered in accordance with its sustainable objectives.	Comment noted. The LPA would suggest that the Inspector recommends that the suggested amendment be taken up within the Central Area Action Plan.
4	9	CH06	Welcome the indication that funding for transport infrastructure will be from developer contributions or through direct provision within developments.	Support noted.
4	8	CH06	Pleased to see that the Council seeks to increase the choice of travel options available and to reduce opportunities for traffic circulating around and through the central area.	Support noted.
241	17	CH06	The provisions to mitigate effects of the development on the wider town centre transport network are weak. They focus on 'managing' traffic but should instead aim to reduce the amount of	The principle of modal-shift is embodied within the Transport Policies, with emphasis being placed on improving access into and around the centre by foot, cycle and public transport.
241	18	CH06	How will the Travel Plans produced by each development be enforced?	As far as we are aware, there are no examples of enforcement carried out in respect of Travel Plans anywhere within the UK. Travel Plans are implemented through planning agreements where

					appropriate.
241	19	CH06	The plans to increase car-parking provision by 50% should be reversed and replaced with a strategy to reinvest these funds in delivering a modal shift towards public transport.		Whilst the overall number of parking spaces will increase, they will not increase at to the same extent of new development proposed. New commercial/retail/leisure floorspace in the centre will increase by nearly 50%, whereas the number of parking spaces in the centre will increase by only 25% (from 6,000 to 8,000 spaces). Given the limited increase in parking spaces there will therefore be a need for modal shift.
4	3	CH06	Fully support the Development Strategy and Principles as they encourage sustainable transport options. Under the 'Transport and Movement' topic, we wish to see a greater commitment to non-car travel		The principle of a shift towards non-car travel modes is embodied within the Transport Policies, with emphasis being placed on improving access into and around the centre by foot, cycle and public transport.
24	24	CH06	If the number of cars is to be restricted, the capacity of park and ride sites will need to be 2,000 each not 1,000. The P&R near GWH should incorporate a pedestrian route to GWH.		Park & Rides are just one of a number of measures to induce a shift towards non-car travel modes. The point regarding including a pedestrian route from the proposed P&R near GWH will be taken forward in the consideration of the detailed design for this P&R site.
350	1	CH06	No where in the plan does it consider the problems of cyclists and pedestrian segregation. There is a tendency for cyclists to use pavements in order to avoid collision with motor vehicles. This is putting pedestrians and cyclists	There should be a provision in the Plan for the consideration of the need for safer road cycling and segregation of cyclists and pedestrians on all cycle routes.	Work to complete the urban cycle network is underway as part of the current Local Transport Plan as well as being identified as one of the Swindon 2010 50 Promises. It is proposed that new development should incorporate clearly signed continuous cycling routes within their developments that join into the urban cycle network. On dual cycle and pedestrian cycle routes, areas are generally designated for cycle use and pedestrian use.
24	23	CH06	Cycle routes from new developments need improving. Routes from	Cycle parking in the town centre should not be "small" and should be secure.	Within the Central Area Action Plan it is proposed that new development should

			<p>Wichelstowe are particularly inadequate eg there is no route direct to Blagrove or Windmill estates and only 2 routes north to the town.</p>	<p>Cyclists and pedestrians should be segregated whenever possible.</p>	<p>incorporate clearly signed continuous cycling routes within their developments that join into the urban cycle network. Ample secure cycle parking is essential and will be consolidated at strategic locations throughout the Town Centre. These will be complemented by a general provision of small cycle parking facilities conveniently located throughout the Town Centre.</p>
16	6	CH06	<p>The Transport Strategy assumes increased levels of traffic and increased adverse environmental impacts. This is an under-ambitious and under-achieving policy, based on</p>	<p>Policy 5, para 2 should read, "to produce a Travel Plan setting out a commitment to reducing levels of traffic associated with any development in order to achieve</p>	<p>The para as drafted in the Plan adopts a realistic approach. All developments will generate vehicle movements.</p>
241	24	CH06	<p>The section on developer contributions focuses on infrastructure. As outlined in the DfT Policy Paper "Towards a Sustainable Transport System: Supporting Economic Growth in a Low Carbon World" (<a href="http://www.dft.gov.uk/about/strategy/transportstrategy">http://www.dft.gov.uk/about/strategy/transportstrategy</a>) Transport Demonstration Towns have proved that travel marketing (education, promotion and incentivisation) is extremely successful and cost-effective way to deliver a modal shift towards sustainable transport, delivering double-digit increases in sustainable transport and reductions in car-travel in just 3 years. The developer contributions should also be applied for significant marketing and promotion of sustainable transport (in addition to infrastructure).</p>		<p>Developer contributions are required to be focused towards infrastructure provision and are not considered the correct avenue for pursuing marketing and promotion of sustainable transport. Other mechanisms are in place to pursue marketing and promotion of sustainable transport, in particular the requirement for development proposals to produce a</p>
241	23	CH06	<p>The Council expects that the bulk of funding will be from developer contributions. We strongly urge that the Council also takes the opportunity to seek substantial government funding</p>		<p>Noted and agreed. Other sources of funding are actively being pursued.</p>

			that is available for sustainable transport initiatives. e.g. Active Swindon had been championing for Swindon to apply for funding to become a Cycle Demonstration Town Bid.		
241	22	CH06	We support the requirement for development proposals to include appropriate cycle parking facilities. In addition, any development where people are to spend more than a few minutes (e.g. workplaces, shopping centres, leisure facilities, restaurants, health centres etc.) should be required to provide secure space (e.g. cloakroom) for cyclists and pedestrians to store and dry things like helmets, panniers and outer-garments.		Policy 5 requires new developments to prepare a Travel Plan, which will address such matters as the provision of secure cycle parking, shower rooms and storage area.
16	5	CH06	There should be reference to what will happen to traffic as a consequence of the canal going through Faringdon Road or the Green Spine.	Cross reference to the Canal Policy (Policy 4) for the future understanding of the reader.	The Halcrow Canal Feasibility Study includes a transport model which concludes that there will be greater vehicular movements along Great Western Way and Kingshill Road. A Borough-wide Transport Study is in preparation which will consider further the wider transport implications of the canal and will provide recommendations as to how any adverse impacts of the canal on the transport network can be mitigated. The Green Spine will not affect vehicular routes, just make them more cycle and pedestrian friendly
241	20	CH06	We welcome the plans to improve pedestrian and cycle provisions. We agree that they must be direct, well-defined, well-lit, continuous and connected to key destinations in order to be well used. To achieve these, cycle paths should be 'on-road' wherever possible. Connectivity across the Town Centre is currently very poor, with 'Cyclists Dismount' in		Agreed. It is intended that the Green Spine proposals will increase connectivity across the Town centre.

24	19	CH06	the pedestrianised Canal Walk, Regent Street, Fleet Street, etc. This barrier to cross-town commuting should be addressed. Mention should be made of the Science Museum. This would have major implications for the A419, Wroughton and Devizes.		This is beyond the scope of the Action Plan. The implications of major development proposals throughout the Borough are being considered by the emerging Borough-wide Transport Study.
337	7	CH06	Transport issues are too reliant on potentially unsound major provisions, while ignoring the unresolved and unrecognised potentials.	Consideration needs to be given to these transport related issues. Especially road re-alignments for 2-way traffic and a proper link across	Noted. Your comments will be forwarded to Transport Planning for consideration in the development of the Swindon Transport Study which should be completed early 2009.
16	5	CH06	Draft PPS4 mainly refers to economic expansion at large new sites - not town centres. The Plan talks of "maximising" car parks - this is the wrong balance, and no flexibility.	Re-write Policy 9 - "The Council will support the development of new car parking space to the north of the railway line". Remove figure of 1,000.	The proposed car park at North Star will be of strategic importance. It is considered of value to specify the number of parking spaces expected, to ensure that the car park is of the size necessary to meet Central Swindon's
166	25	CH06	How will the Travel Plans produced by each development be enforced?		As far as we are aware, there are no examples of enforcement carried out in respect of Travel Plans anywhere within the UK. Travel Plans are implemented through planning agreements where appropriate.
24	21	CH06	Who is the Council's Travel Awareness Officer? How can they be contacted?		Marc Argent - Tel 01793 466392
4	15	CH06	Welcome Policy 11 requiring developers to fund transport infrastructure needs generated by proposals, including public transport infrastructure.		Support noted.
4	2	CH06	As indicated in previous consultation, would like to see a more specific reference within the objective to the importance of improving the accessibility of the town centre by alternative modes of transport other than the private car, including bus,		Noted. We hope that the Transport Strategy section makes our commitment to accessibility via other modes of transport clear.

289	9	CH06	<p>train, cycle and pedestrians. Considers that the inaccessibility of the town centre is a key constraint and therefore reducing the reliance on the private car should be an important objective of its redevelopment.</p> <p>It is not clear which rail crossings will be for which traffic. Will some be for NMU and cars, or will these users be divided? It would be helpful if the policies could spell it out.</p>	<p>There should also be provision when building houses, for ground floor or underground parking.</p>	<p>Existing crossings at Whitebridge Road and Park Lane are routes which accommodate both cars and NMU. These crossings which cross under the railway line are in need of refurbishment. The further proposed crossings and refurbishments are for non motorized uses (NMU).</p>
270	7	CH06	<p>The wording of the Action Plan describes the Bus Exchange as being at the western end of Fleming Way, but the map shows it as in the underpass under the railway line at the northern end of Bridge Street. This would appear to be an error on the map.</p>	<p>Correct error on the map so the location shown for the Bus Exchange matches that described in the text.</p>	<p>There was a drafting error on the original electronic version of the Proposals Map. This has since been rectified and the Map now shows the Bus Exchange on the western end of Fleming Way.</p>
4	26	CH06	<p>Welcome opportunity to be involved in all transport considerations that come forward within the central area with a view to ensuring that sustainable transport objectives are promoted and funding secured from developers. Expect proposals to be supported by appropriate level of technical assessment which demonstrates the impact of the AAP itself and the transportation proposals on the wider highway network. Reserve the right to comment further once technical base is provided.</p>		<p>Noted.</p>
270	8	CH06	<p>The location of the Farnsby Road bus Interchange does not seem to take into account the affect on bus routes that the proposed canal route might have.</p>	<p>Either suggest alternative location for a bus interchange, taking into account the introduction of the canal, or identify how the Farnsby Road bus Interchange will be made accessible to buses from the west once the canal has been</p>	<p>It is acknowledged that when the canal is developed this may necessitate a change of approach to the bus interchange at Farnsby Street.</p>

289	8	CH06	Will the new bus exchange be built over Fleming Way so there is an alternative safe crossing as well as the subway and the space over the road is used?		Fleming Way will be substantially upgraded along its route, to allow greater pedestrian movement across its length.
108	9	CH06	Problem of already overcrowded buses at peak-times exacerbated. Provision for Coaches, both Long Distance and Touring and Day Trips, have not been considered by the Plan	Increase public buses during peak travel periods. Provision for Coaches needs to be addressed, possibly near the station. Consideration should be given to day trip passengers, mainly elderly patrons, whom when visiting the town endure a lengthy walk from Kemble Drive Parking. Catching another bus to get into town would be too	In addition to improvements to the quality and frequency of buses, a modern, redeveloped bus exchange will be provided. Tourist Coach parking bays are provided between the Steam Museum and the Great Western Designer Outlet Centre. Proposed refurbishment of rail crossings to the town centre are proposed, in addition to proposed new crossings which will facilitate the link between the Outlet Centre and the town centre.
265	15	CH06	Strategic Infrastructure Transport Infrastructure. Strategies employed to some extent quite sound. Time will tell if desired results achieved. Then decisions will have to be made if unpalatable draconian methods will have to be employed.		Noted.
211	9	CH06	The existing town centre is currently constrained by poor road linkages, public transport services and pedestrian/cycle provision therefore the redevelopment of Union Square will be committed to improving access to the central area by a range of transport links and is therefore supportive of the transport strategy outlined within Policy 5. Any planning application for Union Square will be accompanied by a transport assessment which will outline the existing conditions within the central area and the package of measure which will seek to improve movement within the Central Area.		Noted.

			<p>Work with Council to achieve appropriate improvements to public transport provision to serve the development, including the relocation of the bus station.</p> <p>Supports Council's approval for the provision of a 1000 space car park within the Swindon Central Area and considers that whilst it is an objective to reduce car travel, some parking provision will be required in order to make the development viable. Will seek to work with the Council on agreeing on an appropriate level of car parking provision for the Union Square development.</p> <p>Will seek to work with the Council to agree on an appropriate package of contributions/works to transport infrastructure in and around the Union</p>		
270	9	CH06	<p>The location of parking for those approaching from the west (Brunel north and west car parks) does not seem to take into account the affect on traffic flows that the proposed canal route might have.</p>	<p>Either suggest alternative locations for car parking, taking into account the introduction of the canal, or identify how the Brunel car parks will be made accessible to cars from the west once the canal has been introduced.</p>	<p>Whilst the strategic importance of these car parks would be reduced, they would still perform a role in meeting the parking needs of the Town Centre.</p>
80	13	CH06	<p>The plan would benefit from a better explanation of how and when the various ideas for improvement fit with transport strategy, how they will be delivered and more particularly the</p>	<p>Considerable importance could be attached to North Star because of the area's potential to accommodate a University. Better connections to this area, would seem to be a high priority and, if so, the plan might say so say how they can be delivered.</p>	<p>The Plan states that the new and improved railway crossings will be expected to be provided as part of the Swindon Central development.</p>
158	2	CH06	<p>Supports Policy 11 and the use of developer contributions to deliver improvements to the railway station.</p>		<p>Noted.</p>
241	16	CH06	<p>The current Transport and Movement Principle to "facilitate improvements to</p>		<p>The principle of modal-shift is embodied within the Transport Policies, with</p>

			all travel modes" need to be replaced by a principle to 'deliver a modal shift to sustainable travel.		emphasis being placed on improving access into and around the centre by foot, cycle and public transport.
166	23	CH06	The transport and movement strategy is not fit-for-purpose, given Swindon's aspiration for sustainable development.	Given the negative impact of car-travel on many other targets of the CAAP, the current strategy to facilitate improvements to all travel modes should be replaced by a strategy to deliver a modal shift to sustainable transport modes.	The principle of modal-shift is embodied within the Transport Policies, with emphasis being placed on improving access into and around the centre by foot, cycle and public transport.
211	3	CH06	Transport and movement through the central area also needs to be significantly improved in order to make this part of the Borough more accessible and attractive to pedestrians and cyclists. The proposals for Union Square will be seeking to implement improvements to transport, movement and the bus station.		Noted. Enhancing connectivity and pedestrian areas within the Town Centre is a key priority. Developing walking links throughout Central Swindon is integral to Town Centre regeneration. Work to complete the urban cycle network is underway as part of the current Local Transport Plan as well as being identified as one of the Swindon 2010 50 Promises.
166	24	CH06	The provisions to mitigate effects of the development on the wider town centre transport network are weak.	They focus on 'managing' traffic should instead aim to reduce the amount of traffic overall (This has been demonstrated to be feasible by the 'Transport Demonstration Towns' initiative)	The principle of modal-shift is embodied within the Transport Policies, with emphasis being placed on improving access into and around the centre by foot, cycle and public transport.
299	1	CH06	Emphasise the importance of keeping cyclists and walkers separated. Pointed line is painted between walkers and cyclist, it is easy to overstep or cycle over the line. When considering disabilities such as blindness, sharing pavements with cyclists is a nightmare. We need a bar between cyclists and walkers and not just a painted line.		Noted. Your comments will be forwarded on to Transport Planning.
108	10	CH06	Need for safe cycling conditions at all times. The safety of Cyclists will be compromised when having to share a road with a constant stream of buses and heavy commercial vehicles. New housing development, especially		In designated bus/cycle/motorcycle lanes, there is shared priority.  Development Control Guidance Note: Technical Guidance on Parking Standards (December 2007) sets out requirements

			affordable housing requires secure and convenient storage provision for bicycles, if the mode of transport is to become well patronised. This could influence other planning documents.		for cyclists and cycle parking standards within new residential development.
51	2	CH06	Felt that the Central Area Action Plan fell down on the 30 year Transport Plan. In particular the location of Park & Ride sites and links to the larger satellite towns and villages such as Wroughton, Wootten Bassett and Highworth. Also Junction 15 and 16 of M4. Charges for Park & Ride services need to be minimised to encourage people to use them.		Noted, the location of the Park and Ride Sites will be reconsidered by the Boroughwide Transport Study.
158	1	CH06	Supports improvement of linkages across the railway, although plans or works will need to be approved by Network Rail Engineers to ensure no risk or disruption to the operational		Noted.
4	27	CH06	Understand that modelling work of the impacts of the proposals has been undertaken using various modelling packages. Would welcome opportunity to receive and review this technical assessment, which would assist in understanding the wider implications of the AAP proposals. Reiterate that these comments do not prejudice any future responses on site specific matter and request that we be consulted at an early stage on any development sites that come forward.		Noted. Your comments have been forwarded on to Transport Planning.
265	5	CH07	Policy of containing all of cultural activities in a defined area is very sound. Policies are flexible.	Should the title be 'The Promenade - Swindon's Cultural and Civic Quarters'?	It is considered that the proposed change would not add to the clarity of the Plan.
265	6	CH07	Policy 14 - The Commercial Quarter. Delivery mechanism for the proposed new health centre is not sound, because	Plan would become sound by delivering the new health centre to be completed by 2011 within the centre of Swindon	The new health centre would be delivered as part of the first phase of the Union Square development, which will result in it

			there is not confirmed timetable for it's completion (this may be due to the sighting not confirmed).	(as near to the bus exchange would be preferred).	completion prior to 2011.
211	10	CH07	<p>Supports the guidance provided within Policy 14. Committed to working with the Council, New Swindon Company, key stakeholders and the local community to agree the masterplan for the redevelopment of Union Square. Welcomes and supports the need for the proposals to deliver a prime office area and will be seeking to deliver approximately 450 new homes as part of the proposals.</p> <p>In the delivery of 450 new homes, will work with the Council, key stakeholders and the local community to identify the optimum mix of dwelling types for this part of the Central Area.</p>		Support noted
265	4	CH07	<p>The retail core. Policies are clearly defined and well defined aims land ownership. The green spine and the canal projects have been clearly identified areas that may require careful consideration in the implementation of the proposals. The proposals have robust mechanisms in delivery and monitoring quality.</p>		Support noted
352	1	CH07	<p>Supports the allocation of the Sanford Street Area as key Retail Development Opportunity, concluding that the Council's justification is sound and supported by comprehensive and robust evidence. The CAAP Submission Paper identified the Sanford Street area as Site B - Retail Development Opportunity, which will deliver approximately 12,000 m<sup>2</sup> of new retail floorspace. To ensure that the</p>		Noted. A master plan for the area will be progressed at an early stage so as not to hold up the redevelopment of this area.

			<p>policy is in line with PPS6 (Test 4), it should state that all town centre uses (such as offices) would be acceptable on the site. Supports that the Council sets out that it does not wish to hold back the regeneration of the area and if a development scheme was submitted in the shorter term that they would facilitate its prompt progression. Request to be involved in the development of any detailed masterplan for the area. Flexibility should be built into the policy to ensure that the masterplan's development would not prevent the site being redeveloped in the shorter term.</p>	
339	6	CH07	<p>To incentivise greater pedestrian/cycling to this circuit access for non motor vehicles must be created i.e. cycle stands appropriately placed and in sufficient in number. Indeed as Cllr Bluh will have seen in his recent Dutch trip a cycle path with textured path border being able to be incorporated into this type of circuit.</p>	<p>Noted. Ample secure cycle parking is essential and will be consolidated at strategic locations throughout the Town Centre. These will be complemented by a general provision of small cycle parking facilities conveniently located throughout the Town Centre. Secure bicycle parking locations have been identified at Fleet Street, the new Central Library, within the Brunel West car park and within Union Square.</p>
4	18	CH07	<p>Favours mixed use development at the Commercial Quarter to help facilitate a reduced need to travel. Support development requirements for contributions toward new bus exchange and the 'Green Spine' - both support modal shift away from car travel. Comments relating to additional car parking would apply in relation to proposals at Regents Place.</p>	<p>Support noted</p>
338	1	CH07	<p>The Swindon Primary Care Trust (PCT) Carfax Street Walk-In Centre is planned to be relocated within Central Swindon (Union Square development). Essential that the space secured for the</p>	<p>The facility would be located in close proximity of the new bus exchange and would lie just off the Green Spine (a proposed major cycle / pedestrian route through Central Swindon).</p>

proposed health centre allows the PCT to provide a central hub for the provision of health and care services for the population of Swindon and Shrivenham. Facility will need to have easy access for all whether travelling by public transport, car, bicycle or on foot and be in an environment people feel safe to visit. It is vital to achieve a balance between affordability, sustainability, efficiency and appearance.

The car park to the north of the site would be developed and the Wyvern Car Park improved, potentially to accommodate commercial / retail uses at ground floor level. The regenerated wider area would have vibrancy throughout the day and into the evening ensuring that the area will feel safe and secure.

Major concerns were identified regarding the environment surrounding the centre, such as the proposed car parks that will surround the health centre on three sides. Public and staff safety is paramount, as is a positive image and environment where people want to come and feel safe and secure.

Keen to be engaged at every stage of the Swindon Central Action Plan to promote health and mental well being and enable Swindon residents to benefit from all aspects of positive urban

4	17	CH07	Supports aspirations for contributions from major development proposals in The Promenade Area to enhance the Green Spine - thus encourage sustainable movement.	Support noted
4	16	CH07	Supports aspirations for the retail core that seek to encourage diversity of uses. Reserves opportunity to comment on proposed master plan for Sanford Street Area and Upper Bridge Street/Fleet Street Area. Expect detailed proposals to be supported by robust evidence base of assessment produced early in master planning	Noted and agreed

158	4	CH07	Site as indicated on the attached plan unallocated. If not allocated then unsound as it does not represent the most appropriate in all circumstances.	Site could be safeguarded for rail freight or a rail related use. Where a suitable rail related use cannot be identified, the allocation should remain flexible enough to allow other uses following consultation with the local planning authority. One option is to use the site as a rail related car park assuming the necessary investigations have taken place and a suitable link to the station can be identified. Potential use can assist in the promotion of sustainable travel.	The site is owned by Network Rail. Such a safeguarding allocation is not deemed necessary and would unnecessarily limit the flexibility of the CAAP.
108	13	CH07	Recognition required of the potential contribution of the Railway Village site, Carriage Works, The Mechanics Institute, the Former Railway Museum and the cluster of buildings adjacent to the water tower to the social and cultural development of the peoples of the		These important buildings are in the Railway Heritage Area where Policy 17 requires proposals within it or adjoining it to enhance and protect the historic environment. Further, some of the buildings mentioned form part of the "Swindon Central" major project. As Listed Buildings, Policy 15 notes that there would be a requirement for these buildings to be protected and enhanced as part of the Swindon Central development.
349	1	CH07	Policy 13 does not offer sufficient allowance for Class A2 uses.	A2 still creates active shop frontages at ground level, as such policy should be modified to accommodate such uses and create a more balanced range	The primary role of the Promenade is as a cultural quarter. Class A2 uses are not considered complementary to the area's cultural role. There are opportunities elsewhere in Central Swindon for the development of Class A2 uses.
80	32	CH07	This policy refers to a process of master planning which will be affected by uncertainty over whether and how a scheme may need to incorporate a bus exchange.	This policy or policy 7 should include more specific and clearer guidance on this element. (see also comments on policy 7 and in the covering letter with regard to transport strategy)	The final location of the bus exchange is being considered as part of the wider Union Square scheme - the 2 are interlinked - with the wider scheme helping to deliver the bus exchange.
80	31	CH07	We support the aim of enhancing the retail offer of the town.	This policy refers to a process of master planning which will be affected by uncertainty over whether and how a scheme may need to incorporate a canal basin. Policy 4 or 12 should include more specific and clearer	A master plan showing the final specifications and location for the basin is being prepared. This will remove any uncertainty

				guidance on this element.	
158	3	CH07	Site as indicated on the attached plan unallocated. If not allocated then unsound as strategies/allocations are not the most appropriate.	Site could be safeguarded for rail related use. Where suitable rail related use cannot be identified, the allocations should remain flexible enough to allow other uses following consultation with the local planning authority. Promotion of the site for rail related use can assist with achieving sustainable transport use in the wider Swindon area.	The site is owned by Network Rail. Such a safeguarding allocation is not deemed necessary and would unnecessarily limit the flexibility of the CAAP.
94	1	CH07	Support the Action Plan in respect of Policy 13 The Promenade. This policy for a new cultural quarter contains all the elements required for a thoughtful and forward looking framework for the future cultural needs of the Borough.		Noted
108	11	CH07	The importance of secondary shopping is not adequately recognised. Secondary shops provide most of the interest and are a key attraction for shoppers to the centre. Little mention is made of the proposed development of the former Swindon College site. Some of its commercial content is in direct competition with the Regent Place proposal. Although this development contains retail, the linkages to the existing secondary and core cores are non-existent.	Proposals need a rethink and further consideration of secondary shops if the town centre 'vibrancy' is to be	Victoria Road has been earmarked to provide an extension to the secondary shop offer. Old Town will also fulfill a niche, independent shopping role for Central Swindon.
314	3	CH07	The Parade was identified as part of Site C in plans on page 61. Site C was linked to the opening of the canal in this location and identified as a priority for the next 10 years rather than immediately. By linking the canal with future development, the wording implies that the expansion of The Parade centre was a longer term opportunity, when it is deliverable in the short to medium term, providing further modern		The Policy is flexible enough to allow the redevelopment of Site C to come forward in advance of the canal / canal basin. A Master Planning exercise is proposed for this area, which would allow for a retail scheme to come forward in advance of the canal. The need for a master plan to guide the development of this area is justified not just on the basis of the canal, but also on the need for any development in this area to respond to the

			<p>retail units. We maintain this objection in the Submission AAP as little acknowledgement in Policy 12 and its supporting text that the expansion of The Parade is supported and can be delivered in the short term. This is an immediate solution to improving Swindon's retail offer which should be promoted more clearly. Supports aspiration for canal/waterside led renewal, however considers that this aspiration should not preclude other developments coming forward which can help to deliver the comprehensive regeneration of Swindon in the short to medium term.</p>		<p>proposed Green Spine through Fleming Way and the Union Square Scheme.</p>
352	2	CH07	<p>'Delivering an enhanced Retail Core' section of Policy 12 states that 12,000 m<sup>2</sup> of retail floorspace and 75 residential units will be incorporated on the site. Although this estimated quantum of development is broadly supported, it should be recognised that this is an estimate and should not restrict the amount of development, which can be accommodated on the site. Although the estimate is based upon sound evidence, the policy should allow flexibility to ensure that the full potential of this highly sustainable site can be realised. We support Policy 12 and consider it in conformity with the test of soundness, however to ensure that it meets Test 9, the quantum of development specified must be flexible in order to maximise the development potential of this highly sustainable town centre site.</p>		<p>Noted. The 12,000 sqm figure is an estimate and should be used as a guide.</p>
24	26	CH07	<p>If the new civic office campus is to be big enough to incorporate the offices at Premier House and Sanford Street, it will be a dominant feature of the</p>	<p>Why can the civic campus not be redeveloped in the Euclid Street area?</p>	<p>Euclid Street, which lies beyond the Town Centre boundary and which fronts onto residential areas on its southern and eastern sides, is not considered to be the</p>

			Promenade, reducing the space for cultural & leisure uses & creating a parking problem.		ideal location for office space. The civic office campus would contribute to the Promenade area's viability during the day and as demonstrated in the Promenade Supplementary Planning Document, a significant area of land will be given over to cultural and leisure uses.
24	27	CH07	There is little value in providing linkages to the Mechanics Institute unless it is developed into a recognisable and worthwhile public building. The linkage also needs to take into account the closure of Faringdon Road and a crossing over the canal.		Noted and agreed. There will be a requirement for a new crossing linking Emlyn Square to the land to the south of the canal.
337	6	CH07	Trusts and Swindon's Civic Trust proposes a University more centrally rooted in Swindon.	University provision needs consideration with a view to the former College site at Regent Circus and a sufficient student accommodation equating to the number of students	The Regent Circus site benefits from outline planning consent for a mixed-use retail/leisure scheme. The site is no longer available for education use. North Star is centrally located in Swindon.
349	2	CH07	Reduction of Class A1 use minimum threshold. 75% figure is currently too restrictive in a centre where Primary Frontage is dominated by Shopping centres, both existing and proposed.	Flexibility in the 75% minimum threshold figure or a reduction of Class A1 use from 75% to 70%. Consideration for PPS3 diversification objectives. Requirement for limitation of non-shop use concentration, i.e. two non-shop uses siting adjacent to each other.	75% threshold is based on current occupancy rates through the Primary Frontage and the threshold has been set at this high level to ensure that the Primary Frontage performs its primary role as the principal shopping destination in the Borough. Greater opportunities for non-Class A1 uses are provided elsewhere in Central Swindon, notably in the Secondary Frontage and at Victoria
4	19	CH07	Supports proposals for mixed use development at The Railway Corridor "Central Swindon". Proposed new car park to north of the railway supported on condition that it replaces other car parking spaces in the town and does not lead to increase in such facilities.		Noted.
265	8	CH07	The Railway Corridor. Very sensible and sound policies with very clear implementation mechanisms. Also		Support noted

			very flexible in its policies and		
104	42	CH07	There is no sense of what will be completed on these sites to enable a completion date of 2011 and 2016 to be determined. Redevelopment of the theatre is likely to involve a number of sites, rather than being developed on a site-by-site basis.	It seems unrealistic and premature to prioritise sites in this way.	The approach adopted accords with the approach adopted in the Promenade SPD, which has been endorsed by both the Council and The New Swindon Company.
104	41	CH07	The public realm requirements of The Promenade in respect of the green spine are not effectively drawn out, and the cross reference to the public realm section is not particularly helpful.	The less trafficked, more intimate spaces between Theatre Square/Islington Street and the retail core are more likely to be memorable and important in regenerating the town centre and making the different elements come together as a whole.	The adopted Promenade SPD and the emerging Development Brief for the Theatre Area amplify the guidance in Policy 13.
108	12	CH07	The cultural offer proposals for the Cultural Quarter offer little or nothing for the practical aspects of the work that goes into the development of artistic achievement; the studios, workshops, rehearsal rooms, space for experimentation and mistakes.	Offer arts community a variety of affordable space for formal and informal activities and encourage the town centre to act as a focus for the community as a whole. Issues should be taken up with Council Arts officer and with the organisations representing the Community Sector.	There is a proposal for a new Art Gallery in the area. A new theatre is also proposed. Options are being considered for the provision of workshops/studios within the new theatre for the use of local
24	28	CH08	The location of the university campus is fully supported. It will help regenerate the town centre, and bring much needed attention to Swindon.	It is recommended that a tall landmark building should provide a central focus on the site, and that the university should be self-contained for energy production. It should have close links to the Science Museum.	Noted, a high density university development at North Star would be encouraged to maximise land-take in what is a highly accessible location.
192	4	CH08	The University at the Clares Factory and Oasis Leisure Centre site should be pursued.		Support noted
4	20	CH08	The Clares Factory and Oasis Leisure Sites. Support mixed use development within this location. Supports safeguarding land for new sports and leisure facility to replace Oasis Leisure Centre and development of University		Noted and agreed

			Campus. Any proposals would need to demonstrate that they are sustainable in transport terms and not have an adverse impact on trunk road or motorway network. Reserve opportunity to comment on proposed master plan and site specific proposals - further proposals should be supported by a robust assessment of transportation implications.		
265	9	CH08	North Star. Policies are very flexible with clear defined aims though being flexible there are very sound implementation and monitoring safeguards. Proposed siting of University Campus, the most logical, makes the soundness of the overall		Support noted
353	1	CH08	Support for the University at North Star site. Uncertainty about the 3-year timeframe allocated for the scheme	Commit to a 5 year scheme to give more project flexibility.	3 years is considered sufficient time in which to progress the scheme given that delivering a university is a corporate priority. It is 3 years from adoption of the Plan - I.e. up to early 2012.
252	6	CH08	Welcome the plans to accommodate the Swindon University Campus at North Star (Policy 16).		Noted
104	43	CH08	Section seeks to ensure that development proposals in the area positively address the canal & green spine. Given that the AAP foresees the completion of phase 2 of the canal after 2016, it creates uncertainty to require these elements to be addressed.		The Policy seeks to create a framework that will allow development to come forward prior to the canal and to ensure that this development does not prejudice the future delivery of the canal.
4	21	CH08	Hawksworth Industrial Estate. Welcome protection of land for future employment used to support the mix of uses in North Star.		Support noted
324	1	CH08	Hawksworth Industrial Park is currently home to a range of low density, general		The Inspector might wish to consider recommending that the third para of

industrial and business units. Policy 16 states that the land at Hawksworth Industrial Estate will be protected for Class B employment uses. It is considered that this protective description is inflexible for other uses which do not fall within the B Use Classes but that are appropriate on employment land. Test of soundness number 9 requires development plans to be reasonably flexible to enable them to deal with changing circumstances and it is considered that this document is not sufficiently flexible. A broader definition of uses acceptable on employment land should be included within the Area Action Plan in reference to Hawksworth Industrial Estate, to protect the designation but provide a flexible framework that encourages a diverse range of appropriate uses on the site in the future. The longer term aspiration for the site are for an "innovation park", and it is considered that to optimise the potential of the site, appropriate sui generis uses should be included as a suitable use on employment land.

A broad definition of suitable uses for employment land to include those that do not fall within a use class (sui generis), but which are considered appropriate on employment land should be included within the Swindon AAP for the protection of Hawksworth Industrial Park. The following definition is considered appropriate to guide appropriate development of Hawksworth Industrial Park: "All buildings and land which are used or designated for purposes within the Use Class B1, B2

and B8 and closely related uses not

Policy 16 be modified to state, "The Land at Hawksworth Industrial Estate will be protected for Class B employment uses AND OTHER USES THAT WILL ASSIST IN DELIVERING THE COUNCIL'S LONG-TERM AMBITION TO CREATE AN INNOVATION PARK IN THIS AREA WITH STRONG LINKAGES TO THE UNIVERSITY CAMPUS" Delete fourth para.

falling within a use class, sui generis, (such as warehouse clubs, cash and carry businesses and builders merchants) but which are commonly found in industrial estates." This will ensure the best opportunity for a wide range of businesses to come forward, which will facilitate the supply of high quality, well paid jobs across a broad range of skills and types. Moreover, it will provide a clear and flexible framework for the authority to consider proposals that do come forward. It is imperative, however, that the acceptability of each application is considered on their individual merits.

38	4	CH08	It is noted that there are issues surrounding contaminated land in North Star. As well as posing developmental difficulties, it may also have high biodiversity potential, particularly for invertebrates and black redstarts.	We would like to ensure that the green roofs strategy is especially important in this area.	Any development in the area will be asked to incorporate the sustainability principles embodied by the plan. The Green Spine travels through North Star and is essential for increased biodiversity in the urban environment.
4	22	CH08	Pleased to note that developments in North Star should not compromise delivery of canal or 'Green Spine' and new developments will be expected to contribute to the Green Spine's		Support noted
336	3	CH09	The re-routing of the Bus service along Oxford Street runs counter to the objectives of Policy 19, page 99.		Local bus services already run along Oxford Road. There are not proposals to re-route other bus services along Oxford Road.
129	1	CH09	The Railway Village, GWR park and Mechanics Institute should be fully restored with the aim of providing a unique Victorian Railway Village. Railings to park and properties should be restored, only local traffic permitted, gardens designed with a Victorian theme for the terraced cottages,		Policy 17 proposes the preparation of a public realm scheme for the Railway Heritage Area, which would set out in detail the necessary improvements to the area, which are likely to encompass new pavings, the reintroduction of railings to the park and measures to reduce the impact of traffic.

			<p>footways paved with Victorian sized slabs and garden paths replaced with Victorian blue birch's to original design. Managed properly the Mechanics would provide a return to the local economy. Many towns have canals but these are on the original routes, not on existing residential areas. Railway village would be the only one in the country, in a conservation area and a proposed world heritage site. Such an accolade will enhance Swindon's reputation.</p>		<p>The Council is committed to working with the owner of the Mechanics Institute and English Heritage to securing a viable long term use of the building, with the expectation that the building would have a publicly accessible use that does not adversely impact on local residents.</p> <p>It is considered that a canal in place of a busy through road along Westcott Place / Faringdon Road would enhance the Railway Village's World Heritage Site candidacy.</p>
336	2	CH09	<p>The former Great Western Railway Health Centre and Baths should be included within the boundaries of the Railway Heritage Area.</p>		<p>The Inspector may wish to consider the inclusion of the Milton Road Health Hydro within the Heritage Area boundary given its functional connection to the Village.</p>
24	29	CH09	<p>The route from the Outlet Village, past the Mechanics Institute to the town centre, offers an opportunity for an imaginative modern means of movement such as a travelator or</p>	<p>The Mechanics could become a focal point for a refreshment stop, health clinic, health centre, advisory office and law centre, an adjunct to the Youth Service in the former railway museum, and a travel advisory office for railway arrivals.</p>	<p>Policy 17 would support all of the uses suggested.</p>
265	10	CH09	<p>The Railway Heritage Area. Because the development proposal is very sensitive in nature, this would inhibit a flexible approach. Proposals very sound and would enhance the standing of Swindon in protecting its heritage. Identifying the key players, who are very important in bringing a clear and defined approach to the successful conclusion of this project. Importantly, the sound monitoring aspects of these proposals are essential in delivering the desired outcomes.</p>		<p>Support noted</p>
104	44	CH09	<p>It would be useful to have an idea as to the 'contemporary building design' that</p>		<p>The LPA does not wish to be unduly prescriptive, this approach has worked in</p>

			the planning authority considers to be acceptable and worthy of support. A number of 'contemporary' schemes have struggled or been refused in this general area.	the past, eg the Heelis building. The LPA seeks the highest design standards for the Railway Heritage area, the schemes that have been refused were not good
340	2	CH09	Bring Railway Village Community Centre back into use.	This centre is a Council run community centre, which is available for community hire and can be the recipient of developer contributions secured for community centres provided a prioritised scheme of essential works related to new residents can be identified by Community.
344	2	CH09	New doors = good idea.[Relates to Railway Village]	Noted
4	23	CH09	Welcomes aspiration of secure the provision of opportunities for 'Central Swindon living' which will support the self-containment of the town. Infrastructure requirements that support public realm enhancements, cycling and pedestrian linkages and railway crossings are fully supported by the Agency.	Support noted
348	1	CH10	Increase in retail outlets in Manchester Road. Already there are too many of the same outlets and the management including health, hygiene and appropriateness is questionable. Whilst there are to be 'rules' for new outlets, there really ought to be a prohibition, so that there are no new changes of use for now, or, all plans will go through under the old rules.	The local centre boundary has been made smaller (from that shown in the Local Plan) so as to concentrate outlets in a specific area and not allow for single units in predominantly residential streets. Policy 18 confines new outlets to this smaller area and restricts the type of unit
4	24	CH10	Central Swindon's Residential Communities. Welcomes policy to secure the provision of wider opportunities for Central Swindon living. Encourage 'Green Spine' as this will help minimise the impact on the local, trunk road and motorway networks by	Support Noted.

			reducing need to travel to and from town centre by car.		
104	45	CH10	The creation of new retail units in the Broad Street area should be consistent with the scale & size of existing retail units. There are existing units in this area that could create larger outlets which could undermine the offer in the town centre.	The Manchester Road offer is a niche offer and currently at a local small scale. It should not be seen as a destination for shopping beyond the local need it meets presently. This should be better addressed.	Policy S1 of the Local Plan (to be replicated in the emerging Core Strategy) reinforces PPS6 guidance that retail proposals should be of a scale that is appropriate to the role of the centre in the hierarchy.
24	49	CH10	Until the Action Plan gives more detail it is difficult for the public to have any confidence in the Plan. How can you "empower" communities to "identify and prioritise" improvements?		The detail would be added by the Community Plan.
108	14	CH10	Objection to the fact that no policy recognises houses in multiple occupancy. The issues and problems that have arisen have been well aired and documented at the Community Planning Forum.	Need for a robust policy ensuring that the problems of HMOs, can be contained, and balanced communities encouraged.	Policy 18 seeks to achieve this alongside existing Local Plan policies and the Core Strategy will include a specific Development Control policy on subdivision and HMOs. Planning only has control on HMOs that exceed 6 occupants. The Council does have a crosscutting HMO Strategy which has
289	10	CH10	Page 112. New Community Centre for Broad Street. The existing one has high usage partly because it is cheaper.	Although it is said that planning cannot control the price, there should be a clause written into agreements to say that, in order to serve the local communities, the new building will not be more expensive to hire.	This is unfortunately not a planning consideration.
270	10	CH10	The Plan confuses cause and effect when talking about the proportion of families and the impact of HMOs Rather than it being that 'This high proportion of private rented accommodation is in part a by-product of the exodus of families from Central Swindon.' it could actually be the other way around: the exodus of families from Central Swindon being a by-product of the high proportion of private rented accommodation, a	Change to include the wording used by the council officers in their responses to the Preferred Options draft comments: 'proliferation is not just a by-product but creates a vicious circle as family focused community facilities are downgraded and community spirit	It is not considered that the change adds to the clarity of the plan. The Inspector may wish to consider amended wording.

			significant proportion of which is HMOs		
270	11	CH10	Some of the boundaries to the area covered by the Action Plan seem quite arbitrary, particularly to the west and south where they run down the centre of roads (and in Even Swindon, through the centre of the community) where the properties on either side are of similar character. The plan quotes census data from Central Ward, yet a significant minority of Central Ward is excluded from the plan area (and particularly the Residential Communities section) whereas the entirety of Eastcott Ward is contained within the plan area.	Either extend boundary of plan to include Birch Street area and all of Even Swindon, or re-state using census data for Eastcott Ward.	The boundary is a combination of the outer ring road and The New Swindon Company Operational boundary which gives the boundary sensible definition and defensible boundaries.
270	12	CH10	p 106 (10 Central Swindon's Residential Communities, Supporting Central Swindon's Residential Communities) Green spine does not address the need for open space for central communities as, with major roads running within much of its length, it will not supply the type of recreational green space with which it is being compared.	Acknowledge that scope for extending recreational green space appropriate for residential communities is very limited.	The Public Realm section outlines proposals through which great improvements to existing green space can be made.
270	13	CH10	Whilst it is somewhat ameliorated by the statements about the transition zone, a frontage onto Corporation Street that is not 'overbearing' will be of little effect if the scale of buildings behind the frontage is dominant.	Add further detail to what is meant by 'transition zone', in particular to include restrictions on building height.	The Council would not wish to be so prescriptive in the Policy.
293	3	CH10	After 'Broad Street already exhibits a real sense of community...' can it also be added: 'and cohesion'? Whilst it is accepted there is plenty of ongoing work still to be achieved, positive cohesion has now moved on since the Central Area Action Plan was compiled.		The work ongoing at Broadgreen is a credit to the community and the hard work of everyone involved. The Inspector may wish to amend the text as suggested although it is considered that the same sentiment is already well expressed in the existing wording.
			Last April there was a cohesion and		

293	4	CH10	<p>sports day put on at the Broadgreen Community Centre, which will be held again this April, Skeetz Youth Club is running successfully, there is also a girls group, a number of football matches have been played between the Asian and the Goan young men and more are to be arranged, hopefully one that will be played at STFC's ground with all the residents being invited and an informal learning group is being set up so different leaders of groups can meet, engage with each other and learn more about the different cultures etc.</p> <p>In the Preferred Options Paper 2, p98 the following was included: The Council have recently appointed a full-time youth worker for Central Swindon, who has been working with the local communities to improve youth facilities in the area, with a particular emphasis on bringing the Broad Street area's diverse ethnic communities closer together. Many young people in the area from diverse backgrounds, have worked hard to secure funding from the youth bank towards the recently opened Skeetz youth club. The youth club has been a tremendous success.</p>	<p>Can this be put back into the Action Plan submission papers, as the youth worker left her post at the end of last summer and has not been replaced. This is a key post that the Central area needs - especially the BG area - there has been a big influx of over 400 Goan families into the area in the last 3 years and the young Asian people need support that the Youth facilities in Broadgreen can offer.</p>	<p>This representation will be forwarded to the Council's Community Directorate for their consideration.</p>
348	3	CH10	<p>It seems also that BROADGREEN covers only BROAD STREET.. and so my area Alfred Street, is on the edge of BROADGREEN and close to UNION SQUARE, appears to be left out of the equation. If money is to be used to improve the area, then it should include making the area better for residents.. which hopefully result in the reduction of the number of working girls in the area and the associated drug problems.</p>		<p>Broadgreen has been used to define the community based in this area of the town centre and is inclusive of all residential streets including Alfred Street.</p>
293	6	CH10	<p>The BSACC agree with and welcome the</p>		<p>Noted.</p>

			<p>statement, "The creation of new Class A retail outlets in the Broad Street Area will be confined to the Manchester Road 'Local Centre' as defined on the Proposals Map. New Class A5 (Hot Food Takeaways) and Class A3 (Cafes) within the Manchester Road Local Centre will only be allowed within outlets that are not adjacent to residential dwellings and where there will be no adverse impact on residential dwellings in the vicinity", particularly the second paragraph concerning conversion of properties to A5 and A3 use.</p>	
24	30	CH10	<p>A more frequent and comprehensive programme of gully cleaning must be instituted as a matter of urgency.</p>	<p>This comment will be forwarded to Highways for their consideration.</p>
339	7	CH10	<p>Permit free is a solution has been agreed in early planning meetings only to repealed later. To attract those who wish to join with the borough and adopt the low energy, low carbon foot print and therein a healthy, green lifestyle this strategy has to be followed through, Allow development without resident parking permits, Advertise appropriately that the dwelling has no entry into the already compromised parking system, and Outcome purchaser/tenant occupies fully agreeable and compliant with desired outcome of lessening motor vehicle dominance of living spaces.</p>	<p>There have been examples of planning permission granted subject to a condition which precludes owners/tenants of new property being able to apply for residents parking permits with the Council. We cannot oblige applicants to advertise as such but a condition is added as a land charge which any solicitor should pick up when they do searches for prospective buyers.</p>
348	1	CH10	<p>The plan acknowledges that there are less families in the area than expected, so to ensure a better balance there should be a prevention of all conversions of houses to flats. As a resident, I use only one of the current retail outlets and it seems that with the number of cars parked on the pavements, the majority of customers</p>	<p>We have introduced Policy 18 for the residential communities to try and secure a balance of housing provision. Further the Preferred Options Core Strategy promotes a Development Management Policy relating to subdivisions to ensure that minimum thresholds are met and that HMOs are considered according to their impact on amenity. There is a counter</p>

			<p>don't live in the area. On the subject of parking, where are all the customers to the proposed customers to park? For a primary traffic route into the centre, we cannot afford to have more traffic parked on pavements and double yellow lines. Manchester Road is considered a red route out of town after the pubs and clubs shut, so, all these proposed outlets are likely to have shuttered fronts. This makes an area look 'run down' hence the added attraction of prostitutes/kerb crawlers and drugs. These and the drunken revellers will increase the crime in the area.</p>	<p>argument that Manchester Road is more vibrant and better lit given the introduction of new retail units which are open later into the evening. We have sought to confine these kinds of units in a smaller local centre as per the accompanying Proposals Map.</p>
348	4	CH10	<p>Entering the area from County Road based on the proposals would make it worse than now in that one would think one was walking/driving through a street market. Also with the proposals for the canal, traffic will increase through a residential area increasing dangers in the area and adding to pollution.</p>	<p>The Action Plan confines the 'major local centre' allocation to a limited area along Manchester Road. It is not considered that well-designed shop units reduce the attractiveness of the area.</p> <p>There are no proposals to remove the restrictions on access into the Broad Street area from County Road. No significant increases in vehicular movements through the area are envisaged.</p>
348	5	CH10	<p>CCTV IS NEEDED. If its acceptable in the town centre and I'm sure it will be in the newly built areas, then it should be included in our area to try and deter crime and anti-social behaviors.</p>	<p>Developer Contributions are already secured for this purpose but are received over a long period. They are pooled until such time sufficient funding is available for identified schemes. Crime and fear of crime has a high profile in the AAP. Work is being undertaken to prioritise expenditure for the CCTV Strategy. There is nothing to stop private investment in CCTV if traders consider it to be worthwhile in advance of monies being available. Their installation would be supported provided they are compatible with Council monitoring systems and protocol.</p>

293	2	CH10		Can the references to the area as 'Broad Street' be altered to Broadgreen? Broadgreen is the name the area is generally referred to now.	The Inspector might consider recommending that the Plan text be amended accordingly.
24	32	CH10	If new residents in Central Swindon are nor given parking permits it is essential that each new development has integral parking spaces.	Under the Traffic and Movement para on page 111 delete "Central" as all parts of Swindon, including Old Town, can be affected.	The suggested change goes beyond the remit of the Central Area Action Plan. The suggestion will be considered as part of the Core Strategy preparation.
24	31	CH10	"Empowering" is a dubious term, community groups have frequently been consulted but have rarely seen their views taken into account so have become largely apathetic.		The Council is committed to giving the local community a greater say on Council services affecting their area. The preparation of Community Plans will enable communities to properly establish their needs and aspirations and these Community Plans can then inform Council resource allocation.
293	5	CH10	The Community Centre in the Broad Street area is the most well-used centre of its kind in the Borough and is an essential part of community life, used by a diverse range of people and organisations. The Centre however occupies an unattractive and run-down collection of buildings, which are reaching the end of their operational life. With at least 450 new homes proposed at Union Square there is an ideal opportunity to redevelop the Community Centre for both residents of the Broad Street area and the new residents at Union Square, and thus provide opportunities for community cohesion. The Union Square development will be expected to assist in delivering a new Community Centre for the Broad Street area.		Noted
			The BSACC strongly agree with this statement. The present buildings are in need of replacement and it is not nearly big enough for the different demands		

			that are put upon the small number of rooms currently available and when Union Square is built there will very likely be a need for residents of that area to also use the centre.	
333	7	CH11	Document does not indicate there may be some redevelopment opportunity in Newport Street on site of existing Harvest garage site. Important gateway to Godwin Court and would like to see a high-quality development if opportunity arises.	Any proposal would be subject to the generic design, public realm and sustainability policies to ensure its
342	2	CH11	Big problem with residents parking currently (is the permit numbers matched/rationed to number of spaces?) and is there any differentiation between permit holders	Comment relayed to Council's Parking Services Team. Not strictly relevant to the Action Plan.
4	25	CH11	The Old Town Area. Welcomes proposed 'Green Spine' and other public realm improvements in area that will encourage greater movement by pedestrians and cyclists.	Support noted
333	1	CH11	Not in favour of full-time pedestrianisation as detrimental to trade and impractical due to lack of service lane on its north side and only limited on the south side. Is scope for part-time pedestrianisation through the development of a comprehensive scheme for whole street-scape taking into account view of all Wood Street traders and businesses.	Noted. Paragraph was intended to provide flexibility. Inspector may wish to remove reference to pedestrianisation in favour of terms that reflect the aspiration for the environment to be improved for all highway users.
333	2	CH11	Old town does not have a comprehensive CCTV surveillance system. Area experienced a general increase in crime. Centrally monitored system would be of great benefit and would lead to reduction of crime in area.	Way forward to work closely with Council and police to see if funding can be found for a comprehensive CCTV  Developer Contributions are already secured for this purpose but are received over a long period. They are pooled until such time sufficient funding is available for identified schemes. Crime and fear of crime has a high profile in the AAP. Work is being undertaken to prioritise

					expenditure for the CCTV Strategy. There is nothing to stop private investment in CCTV is traders consider it to be worthwhile in advance of monies being available. Their installation would be supported provided they are compatible with Council monitoring systems and protocol.
333	3	CH11	Provision of public toilets in Old Town non-existent. In public interest that Council either refurbish existing facility or consider new toilets as part of the Locarno Old Town development		A Public Toilet Task Group was set up by the Council to discuss the future of public toilets in the borough. While the borough doesn't have a legal obligation to provide toilets it has committed itself to providing them as part of new schemes and maintaining them where it is a viable proposition. Wharf Green for example included the refurbishment of the public toilets at Brunel West Car park. The Locarno does not include public toilets as such but there are facilities within the retail elements which can be used at the discretion of the management.
24	33	CH11	As Bath Road is to become both an inner and outer ring road there will be inevitable effects on The Mall, Goddard Ave and Quarry Rd.		Bath Road is already part of the outer ring road.
24	34	CH11	The future of Wood Street is not as stated on Page 114 "to be pedestrianised", this is very much under consideration at present and the result should not be presumed.		The priorities for Wood Street are to enhance the environment for all highway users, including pedestrians. The Inspector may wish to remove the specific reference to pedestrianisation and retain the other text which relates to flexibility and enhanced public realm.
24	35	CH11	For practical reasons it must be kept open, at least some of the time, as many of the premises have not rear access for deliveries etc and complete closure would only add to the ever increasing traffic problems in Newport Street and Devizes Rd.	A connecting road from Victoria Rd to Drove Rd should be considered as means of reducing traffic pressure on Victoria Rd and the Bath Rd junction. Some means must be found of segregating cyclists from motorists.	The priorities for Wood Street are to enhance the environment for all highway users, including pedestrians. The Inspector may wish to remove the specific reference to pedestrianisation and retain the other text which relates to flexibility and enhanced public realm.

333	6	CH11	<p>Victoria Road in retail decline for some years. Pavements poor in many places and in need of urgent attention. Top part of Victoria Road is in need of a face lift, better lighting and access to Prospect Place car park. General tidy up beneficial and not too expensive. Agree that proposed development on college site over time could help to regenerate the lower to middle part of Victoria Road. Council could encourage by improving street-scape to make vital economic link between Old Town and New Town a pleasant experience for visitors to the area. Must have clear direction in planning policy for important part of Old Town.</p>	Agreed. This is exactly the vision for Victoria Road.
333	8	CH11	<p>Locarno. Keen to see provision of more on-street parking spaces to help compensate for loss of parking in the Old Town square and also the long-stay car park. Opportunity for more on-street parking in Wood and High</p>	Noted
333	9	CH11	<p>Do not want mass development on site of Goddard Arms' Hotel. Scale of development needs to be sympathetic with surrounding buildings and in keeping with road access to it.</p>	Noted. Existing design policies in the Local Plan 2011 will be used to ensure any proposed development is appropriate to its context
334	1	CH11	<p>Over all we very much like, the scheme. It's hard to see how any retailer would not. Our one comment is that full pedestrianisation of Wood Street would be a disaster; we would look to move away from the street if this happened. Walking access only, such as in new town, does not suit all retailers, we deliberately did not look for premises there.</p>	The priorities for Wood Street are to enhance the environment for all highway users, including pedestrians. The Inspector may wish to remove the specific reference to pedestrianisation and retain the other text which relates to flexibility and enhanced public realm.
265	12	CH11	<p>The Old Town Area. Proposals are flexible, but limited because of</p>	Support noted

			historical nature of buildings. Taking this into account, the strategies and policies proposed for the area are very sound. Backed up by very defined quality control mechanisms.	
108	15	CH11	Objection to the fact Old Town is included in the Central Area. It should have its own Action Plan, tailored to its needs, as should the other outliers at Rodbourne and Gorse Hill.	Old Town provides a retail, leisure, and cultural offer that is unique to the Borough. The fact that Old Town and the Town Centre complement each other in delivering a diverse retail/cultural offer will help attract people into Central Swindon. The Old Town's complementary niche retail role therefore warrants its inclusion in the Action Plan.
333	5	CH11	Art collection and Museum should remain in Old Town. Would Council consider modernising existing buildings at top of Victoria Road or new site in Old Town.	There are ongoing discussion about the right location for the Art Gallery. Whilst its final location is likely to be in the Promenade area. the AAP provides sufficient flexibility to support its inclusion in New Town or Old Town, wherever is deemed most appropriate.