

Swindon Borough Council Suggested Changes to the Swindon Central Area Action Plan Submission Paper

Having considered the representations received to the Swindon Central Area Action Plan Submission Paper, the Council intends to suggest that the Inspector considers the following minor amendments to the Plan text and the Proposals Map. It is considered that these changes will aid clarity without giving rise to a material change to the Plan.

Section	Page / Policy Number	Respondent	Representation Number	Representation Summary and Suggested Actions	Council Response (yellow indicated where changes are invited by the LPA)
CH03	Page 16	The New Swindon Company	104/8	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 'nodes').	The Inspector may wish to raise the profile of the Glossary by removing it from Annex 1 and reinstating it at the end of the main document. The Inspector may wish to add the following definitions to the glossary: - "Node: focal places such as junctions of paths, examples include roundabouts and market squares" and "landmark: Points of reference that assist people in orientating themselves to an area" .
CH03	Page 16	RK Hayden	270/1	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.	The Inspector may wish to consider adding the following wording to the end of the first paragraph of the Town Centre Section at Page 16: "Care must also be taken to ensure that the Town Centre's few remaining high quality older buildings are protected and enhanced to add character and variety" .
CH03	Page 17 and Page 21	The New Swindon Company	104/11	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 references at Pages 17 and 21 to "Centre for Architecture and the Built Environment" be amended to read "Commission for Architecture and the Built Environment" .

CH03	Page 19	The New Swindon Company	104/5	<p>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.</p> <p>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'.</p>	<p>The Inspector may wish to consider the inclusion of the word "especially" to the second bullet point of Policy 1 after "incorporate active frontages..." to widen the application of the policy to other applicable areas</p>
CH03	Page 19 - Policy 1	Mrs C Spickernell	289/1	<p>What does "active frontages" mean?</p>	<p>The Action Plan defines active frontages in some policies. The Inspector may wish to include the definition at the end of Policy 1 "An active frontage refers to a frontage that can engage the general public, for example, a shop's public display area."</p>
CH03	Page 19 - Policy 1	CPRE	16/11	<p>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.</p> <p>The Policy should include reference to high quality construction not only sustainable or complementary design.</p>	<p>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.</p>
CH03	Page 19 - Policy 1	Mrs C Spickernell	289/2	<p>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 improvement?</p> <p>Policy 1, add "where the existing design is good and much appreciated" in front of "respect the context of the site and character".</p>	<p>The Inspector may wish to add the following text to the 6th bullet point of Policy 1 in front of "respect the context of the site and character": "where the existing design is good and much appreciated".</p>
CH04	Page 26 - Policy 2	Swindon Civic Trust	108/3	<p>Ongoing maintenance of the measures stated in the policy is also an important management issue.</p> <p>The ongoing maintenance needs to be stressed in the policy.</p>	<p>The Inspector may wish to consider adding the following paragraph to the Quality Assurance Section at Page 28: "Where on-site energy supply, a sustainable urban drainage system, a waste separation & storage facility or a Green Roof is proposed, applications will be required to demonstrate how the proposal intends to deal with management and maintenance issues associated with these facilities."</p>

CH05	Page 34	Pipers Area Residents Association	351/3	<p>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.</p> <p>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.</p>	<p>Agreed. The priorities for Wood Street are to enhance the environment for all highway users, including pedestrians. The Inspector may wish to amend the 2nd sentence of Pt 6 of Page 34 to state: "It is proposed to greatly improve the pedestrian environment, which subject to detailed design considerations, could include the introduction of 'spill out areas' for pavement cafes, bars and shops". Also, amend the 2nd sentence of the 6th paragraph of Page 114 with the same new wording.</p>
CH05	Page 34	Red Planet Bikes	334/1	<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>	<p>Agreed. The priorities for Wood Street are to enhance the environment for all highway users, including pedestrians. The Inspector may wish to amend the 2nd sentence of Pt 6 of Page 34 to state: "It is proposed to greatly improve the pedestrian environment, which subject to detailed design considerations, could include the introduction of 'spill out areas' for pavement cafes, bars and shops". Also, amend the 2nd sentence of the 6th paragraph of Page 114 with the same new wording.</p>
CH05	Page 39	RK Hayden	270/5	<p>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.'</p> <p>These two sentences should be removed.</p>	<p>The Inspector may wish to remove the 4th sentence of the 5th paragraph of Page 39: "Uplighting of trees should therefore be considered where possible." However, it is considered that the 3rd sentence is a desirable objective to promote the greenery of our inner urban area.</p>
CH05	Page 40	Wiltshire Wildlife Trust Ltd	38/2	<p>Support the Green Spine and Spaces sections.</p> <p>When describing individual parks, the potential for biodiversity enhancement should be mentioned, eg, sympathetic management of hedgerows in Ferndale South Recreation Area.</p>	<p>The Inspector may wish to consider amending the 5th paragraph of Page 40 by adding the following sentence after the 3rd sentence to state: "There are also potential opportunities for biodiversity enhancement in these green spaces and parks, which should be considered within any improvement schemes".</p>
CH05	Page 46	The New Swindon Company	104/31	<p>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'.</p>	<p>The Inspector may wish to add a further paragraph to the the 'Delivery Mechanisms' section at Page 46, to state: "The public art strategy for the central area requires that every public art commission demonstrates a commitment to sustainability".</p>

CH05	Page 51	British Waterways	72/3	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 add to the 'Key Players' at Page 51: "British Waterways - key advisory role in linking the canal to the Kennet and Avon Canal at Semington in the future"
CH06	Page 54 - Policy 5	Highways Agency	4/10	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.	The Inspector may wish to consider amending the 2nd para of Policy 5, at Page 54, to read: "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."
CH08	Page 89	Costco Wholesale UK Ltd	324/1	Hawksworth Industrial Park is currently home to a range of low density, general 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 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	The Inspector may wish to consider recommending that the third para of Policy 16 be amended to read, "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)

				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.	
CH09 and Proposals Map	Page 95 and Proposals Map	Mr BV Cockbill	336/2	The former Great Western Railway Health Centre and Baths should be included within the boundaries of the Railway Heritage Area.	The Inspector may wish to consider recommending the inclusion of the Milton Road Health Hydro within the Heritage Area boundary as shown on the Proposals Map given its functional connection to the Village.
CH10	Page 107	Broad Street Community Council	293/2		The Inspector might consider amending the reference to the "Broad Street Area" to read " Broad Green " (2nd Para of Page 104, 3rd Heading of Page 107, 6th para of Page 107, 7th para of Page 107, 1st Para of Page 108, 2nd para of page 108, 3rd para of Page 108, 1st para of Page 109, 2nd para of Page 109, 3rd para of Page 109, 1st heading of Page 111, 3rd para of Page 111, 1st and 2nd bullet points of Page 112, and 3rd para of Page 112)
CH10	Page 108	Broad Street Community Council	293/3	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 consider amending the 2nd sentence of the 3rd para of Page 108 to read: "Broad Green already exhibits a real sense of community and cohesion ..."

CH11	Page 114	Old Town Group	24/34	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.	Agreed. The priorities for Wood Street are to enhance the environment for all highway users, including pedestrians. The Inspector may wish to amend the 2nd sentence of Pt 6 of Page 34 to state: " It is proposed to greatly improve the pedestrian environment, which subject to detailed design considerations, could include the introduction of 'spill out areas' for pavement cafes, bars and shops ". Also, amend the 2nd sentence of the 6th paragraph of Page 114 with the same new wording.
CH11	Page 114	Old Town Group	24/35	For practical reasons it must be kept open, at least some of the time, as many of the premises have no rear access for deliveries etc and complete closure would only add to the ever increasing traffic problems in Newport Street and Devizes Rd.	Agreed. The priorities for Wood Street are to enhance the environment for all highway users, including pedestrians. The Inspector may wish to amend the 2nd sentence of Pt 6 of Page 34 to state: " It is proposed to greatly improve the pedestrian environment, which subject to detailed design considerations, could include the introduction of 'spill out areas' for pavement cafes, bars and shops ". Also, amend the 2nd sentence of the 6th paragraph of Page 114 with the same new wording.
CH11	Page 114	Old Town Business and Professional Association	333/1	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.	Agreed. The priorities for Wood Street are to enhance the environment for all highway users, including pedestrians. The Inspector may wish to amend the 2nd sentence of Pt 6 of Page 34 to state: " It is proposed to greatly improve the pedestrian environment, which subject to detailed design considerations, could include the introduction of 'spill out areas' for pavement cafes, bars and shops ". Also, amend the 2nd sentence of the 6th paragraph of Page 114 with the same new wording.
CH2 and CH5	Page 13 and Page 38	The New Swindon Company	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.	The CAAP boundary is as shown on the Proposals Map. For clarity the Inspector may wish to recommend that the Maps at page 13 and page 38 are edited in accordance with the Proposals Map.

CH7, 9, 10 and 11	Pages 88, 100, 112 and 117	Thames Water Property Services	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.	The Inspector may wish to consider recommending that the final bullet points at Pages 88, 100, 112 and 117 be changed to read: "Utility Infrastructure Improvements"
Section 11	Implementation Plan - Page 37	Old Town Group	24/47	Under Section 11 of the Implementation Plan add "and cyclists".	The Inspector may wish to consider recommending amending 'Section 11 - Old Town and Victoria Road' at Page 37 of the Implementation Plan to read "...promoting uses which encourage pedestrian and cyclist movement between the two centres".
	Proposals Map	GOSW	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).	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 text - i.e.: The first heading at Page 50 should read - "The Gateway at Kingshill (Area D1 on the Proposals Map)" . The 2nd heading at Page 70 should read - "Site A - Regent Place (Area D2 on the Proposals Map)" . The 1st Heading at Page 71 should read - "Site B - Sanford Street Area (Area D3 on the Proposals Map)" . The 1st Heading at Page 72 should read - "Site C - Upper Bridge Street / Fleet Street Area (Area D4 on the Proposals Map)" . The 1st Heading of Page 73 should read "Swindon Market Hall (Area D5 on the Proposals Map)" . The 1st Heading of Page 82 should read "Proposals for Union Square (Area D6 on the Proposals Map)" . The 1st Heading of Page 86 should read "Swindon Central (Area D7 on the Proposals Map)" . Note for Inspector - Areas D8 and D9 are both the subject of Planning Applications. Area D10 is a housing allocation that has been carried forward from the Swindon Borough Local Plan 2011.
Proposals Map and Page 99	Proposals Map	Mr BV Cockbill	336/3	The re-routing of the Bus service along Oxford Street runs counter to the objectives of Policy 19, page 99.	This is a Drafting error. The Inspector may wish to amend the Proposals Map and the Map extract at Page 95 to show the bus priority route travelling along London Street/Sheppard Street (not Oxford Street).
Proposals Map and Page 99	Proposals Map	Swindon Civic Trust	108/5	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 of life.	This is a Drafting error. The Inspector may wish to amend the Proposals Map and the Map extract at Page 95 to show the bus priority route travelling along London Street/Sheppard Street (not Oxford Street).