

Swindon Borough Council

LOCAL DEVELOPMENT FRAMEWORK

SWINDON CENTRAL AREA ACTION PLAN

POSITION STATEMENT No SBC05A

OVERVIEW OF GENERAL MATTERS RELATING TO THE PLAN

An overview of the plan in relation to the soundness tests, drawing together relevant points from earlier sessions as necessary:

Procedural and conformity tests

- Has the plan been prepared in accordance with the Statement of Community Involvement? [2]
- Has the plan and its policies been subjected to Sustainability Appraisal? [3]
- Has regard been had to the Community Strategy? [5]
- Is the plan consistent with national planning policy, including Policy Statements published whilst the CAAP was in preparation and post-submission? [4]
- Is the plan consistent with the adopted/emerging Regional Spatial Strategy (RSS), including the Panel's recommendations following the RSS Examination in Public which post-date the CAAP submission paper? [4]
- What regard has been had to the relevant plans, policies and strategies of neighbouring planning authorities when considering Swindon's role in the regional/sub-regional context? Do any cross-boundary issues arise from competition with other regional centres and aspirations for Central Swindon to be "a destination of choice"? If so, how does the plan address these issues? [6]

Contents

	Page No.
Has the plan been prepared in accordance with the Statement of Community Involvement? [2]	3
Has the plan and its policies been subjected to Sustainability Appraisal? [3]	3
Has regard been had to the Community Strategy? [5]	4
Is the plan consistent with national planning policy, including Policy Statements published whilst the CAAP was in preparation and post-submission? [4]	5
Is the plan consistent with the adopted/emerging Regional Spatial Strategy (RSS), including the Panel's recommendations following the RSS Examination in Public which post-date the CAAP submission paper? [4]	7
What regard has been had to the relevant plans, policies and strategies of neighbouring planning authorities when considering Swindon's role in the regional/sub-regional context? Do any cross-boundary issues arise from competition with other regional centres and aspirations for Central Swindon to be "a destination of choice"? If so, how does the plan address these issues? [6]	8

Has the plan been prepared in accordance with the Statement of Community Involvement? [2]

The Issues and Options Statement of Community Involvement was published in July 2005 and Preferred Options in December 2005. Following receipt of the Inspector's report the Statement of Community Involvement was adopted by the Council in January 2007.

As explained in the CAAP Regulation 28 Statement of Consultation (Annex 3 to the CAAP Submission Paper) (CD5), the Central Area Action Plan preparation publicity and consultation has taken place in accordance with the Swindon Statement of Community Involvement (2007) (CD17), and prior to its adoption, the latest emerging drafts of the Statement of Community Involvement and the Town and Country Planning (Local Development) (England) Regulations 2004.

Consultation has followed a two-pronged approach encompassing wide spread general publicity and consultation and targeted detailed engagement.

Publicity and consultation continues. The Action Plan commits the Council and its regeneration partners to consult on detailed schemes coming forward. This will include in-depth consultation on the details of the canal scheme and on the public realm improvements identified in the Action Plan. Consultation will also take place on the Broad Street Area Community Plan which is being prepared by the Broadgreen Community Council and which will amplify the Policy Framework provided by the Action Plan.

Has the plan and its policies been subjected to Sustainability Appraisal? [3]

Sustainability Appraisal is mandatory for all new or revised DPDs and it has been carried out in accordance with Section 39(2) of the Planning and Compulsory Purchase Act 2004.

A Scoping Report (CD18) was prepared which sets out the context and objectives for the Sustainability Appraisal, establishes the sustainability baseline and the scope of the ongoing process. A Draft of the Scoping Report was published for consultation between 24th July 2006 and 5th September 2006. Amendments were made to the Scoping Report following the close of this consultation period and a revised Draft Scoping Report published in December 2006.

A Sustainability Appraisal Report was produced to inform the Issues & Options (CD11), Preferred Options (CD13) and Submission (CD6) stages of development of the Central Area Action Plan, and was subject to public consultation along with each draft of the CAAP in line with the requirements of the adopted Statement of Community Involvement.

The Sustainability Appraisal Report incorporates an 'environmental assessment' in accordance with the requirements of European Directive 2001/42/EC (the 'SEA Directive'), transposed by the Environmental Assessment of Plans and Programmes Regulations 2004.

Has regard been had to the Community Strategy? [5]

Our Swindon Our Community Our Future - A Community Strategy for Swindon 2004-2010 (CD141) has as an objective 'To create a place in which people are proud to spend time, live, work and visit and which achieves a better quality of life for all'. This is mirrored closely by the vision and objectives put forward by the CAAP.

The new Swindon Sustainable Community Strategy - A Shared Vision for Swindon 2008-2030 (CD142), which recently replaced the Community Strategy (2004-2010), sets a range of priorities and objectives, which the Central Area Action Plan will help deliver.

Page 8 of the Swindon Sustainable Community Strategy notes that the town centre suffers from a legacy of low quality buildings and budget shops that increasingly populate high streets. Policy 1 (High Quality and Innovative Design) and Policy 12 (Development Requirements for the Retail Core) of the CAAP will help to address these problems.

At page 10 the Strategy states, "By 2030, the Borough of Swindon will have become a place where people choose to live, visit and invest. As an important regional centre, Swindon's appeal will stem from having an attractive and well-equipped town that has successfully blended traditional architecture with high quality contemporary buildings that incorporate sustainable design and construction principles. The possibility of a fully restored canal in the heart of the town could provide a real focal point for visitors and Swindonians alike". Policies 1, 2 and 4 of the CAAP will help deliver these aspirations.

At page 10 the Strategy further states that "Swindon will have its own university..." Policy 16 (North Star) of the CAAP will help deliver this aspiration.

At page 11 the Strategy advises that "... Swindon will have invested in its leisure and cultural offering so that it can compete favourably with the neighbouring cities of Bristol, Bath, Reading and Oxford." Policy 13 (The Promenade – Delivering a New Cultural Quarter for Swindon) of the CAAP will help deliver this aspiration.

At page 13 the Strategy that "Shopping will be a delightful mix of big name stores and independent shops. The public areas in the centre of Swindon will be attractive, clean, appealing and safe." Policy 12 (Development Requirements for the Retail Core) of the CAAP will help deliver this aspiration.

At page 13 the Strategy also notes that "The less affluent or disadvantaged areas of 2007 will be much improved as a result of both physical transformation and the raised expectations, aspirations and achievements of the people who live there." Policy 18 (Central Swindon's Residential Communities) of the CAAP will help deliver this aspiration.

At page 14 the Strategy states, "The Local Authority will have used its planning powers sensitively so that Swindon becomes a place that enjoys national recognition for safeguarding and enhancing its built and natural environment for future generations. The landscaping and open spaces in new developments will be designed to look attractive and be havens for wildlife." Policy 3 (Public Realm) of the CAAP will help deliver this aspiration.

At page 15 the Strategy states, “Fewer people travelling around Swindon will need to use a car as public transport will be reliable, affordable and convenient. Additionally, footpaths will be kept to a good standard and any new developments will build in an excellent, safe network of routes for walking and cycling”. The Transport and Movement Strategy of the CAAP will help deliver this aspiration.

At page 20 the Strategy states, “Residents’ pride in their locality will be enhanced, with local people taking more responsibility for the general well-being of the place in which they live, supported by the statutory and non statutory bodies. Local people won’t wait for the council or other public agencies to address problems in their neighbourhood. Instead, they will know how to get involved, alongside other agencies, to solve issues like anti-social behaviour or graffiti.” Policy 18 – (Central Swindon’s Residential Communities) of the CAAP will help deliver this aspiration.

As shown above, the CAAP has been prepared with full regard to Swindon’s Sustainable Community Strategy and will be a key tool in helping to deliver its aims.

Is the plan consistent with national planning policy, including Policy Statements published whilst the CAAP was in preparation and post-submission? [4]

In the Government Office of the South West’s response to the CAAP Submission Draft consultation (letter dated 25 February 2008), no conflicts with national planning policy were identified.

The key national planning policy statements of relevance to the CAAP comprise:

- PPS1 (Creating Sustainable Communities)
- PPS3 (Housing)
- PPS6 (Planning for Town Centres)
- PPS 9 (Biodiversity & Geological Conservation)
- PPS10 (Planning for Sustainable Waste Management)
- PPG13 (Transport)
- PPG15 (Planning and the Historic Environment)
- PPG21 (Tourism)
- PPS22 (Renewable Energy)
- PPS25 (Development and Flood Risk)

PPS1 underpins the requirement for planning to deliver sustainable communities through the four principles of sustainable development – sustainable economic growth, social inclusion, environmental protection and prudent use of natural resources. There is a need for positive planning and proactive management of development, together with plans to set clear visions for communities and to be transparent, accessible and accountable. PPS1 also seeks to ensure that DPDs should address the causes and potential impacts of climate change, should promote high quality inclusive design, should consider the diverse needs of the community and should aim to break down barriers and exclusions. All of these aspirations are enshrined within the CAAP.

PPS3 seeks to ensure that a wide choice of housing is available, for both affordable and market housing, to meet the needs of all members of the community, deliver a better balance between housing demand and supply in every housing market and to improve affordability where necessary and create sustainable, inclusive, mixed communities in all areas. Developments should be

attractive, safe and designed and built to a high quality. They should be located in areas with good access to jobs, key services and infrastructure. Each of these objectives are enshrined in the CAAP.

PPS3 goes on to advise that DPDs must allow for enough housing to meet local needs whilst maximising the use of previously developed land. They should seek to promote mixed-use developments that include affordable housing and aim to achieve sustainable residential environments. Again, the CAAP will help to deliver these expectations.

PPS6 seeks to deliver the Government's objective of promoting vital and viable town centres. Development should be focused in existing centres in order to strengthen and, where appropriate, regenerate them. The main 3 requirements are to actively promote growth and manage change in town centres; to define a network and a hierarchy of centres each performing their appropriate role to meet the needs of their catchments; and to adopt a proactive, plan-led approach to planning for town centres, through regional and local planning. The CAAP meets all of these requirements.

PPS9 sets out the Government's broad policy objectives regarding biodiversity and geological conservation in England. It includes the broad aim that planning, construction, development and regeneration should have minimal impacts on biodiversity and enhance it wherever possible. Conserving and enhancing biodiversity is a key theme for the CAAP.

PPS10 aims to protect human health and the environment by producing less waste and by using it as a resource wherever possible. Through more sustainable waste management practices, moving waste up the hierarchy (reduce, re-use, recycle) aims to break the link between economic growth and the environmental impact of waste. PPS10 contains the objectives to: Drive waste up the waste hierarchy by addressing waste as a resource; Provide a framework where communities take more responsibility for their own waste; Help implement the National Waste Strategy and meet targets set by EU Legislation; Secure the recovery or disposal of waste without endangering human health; Reflect the concerns and interests of communities and all stakeholders; and Ensure the design and layout of new development supports sustainable waste management. The CAAP positively addresses these objectives.

PPS12 sets out the Government's policy on the preparation of local development documents. It requires local planning authorities to adopt a spatial planning approach to LDFs to ensure the most efficient use of land by balancing competing demands within the context of sustainable development. The CAAP is a spatial plan that seeks to make the most efficient use of the finite land in Central Swindon.

The objective of PPG13 is to integrate planning and transport at the national, regional, strategic and local level to promote more sustainable transport choices; promote accessibility to local facilities by walking and cycling and to increase social inclusiveness; reduce the need to travel, especially by car; allocate or reallocate sites which are (or will be) highly accessible by public transport; and allocate or reallocate sites unlikely to be well served by public transport for uses which are not travel intensive. These aspirations are enshrined within the CAAP's

Development Strategy and within the Transport and Movement Section of the plan.

PPG15 urges local authorities to maintain and strengthen their commitment to stewardship of the historic environment, and to reflect this in their policies and allocation of resources. It encourages the identification and protection of historic buildings, conservation areas and other elements of the historic environment. Central Swindon's historic environment is given due attention in the CAAP. The policies of the CAAP seek to protect and enhance Central Swindon's Conservation Areas and Listed Buildings.

PPG21 outlines the economic significance of tourism and its environmental impact, and therefore its importance in land-use planning. It explains how the needs of tourism should be dealt with in development plans and in development control. It considers the impact of tourism and the role of the planning system, its economic significance and future trends. PPG21 notes that tourism makes a major contribution to the national economy and to the prosperity of many cities, towns and rural areas. Its continuing growth generates a range of economic activity and new job opportunities. Tourism associated with designated areas and areas of cultural heritage can act as a positive for environmental protection and enhancement. The policies of the CAAP, notably the policies relating to the Promenade and the Canal will help make Central Swindon a more vibrant tourist location.

PPS25 seeks to ensure that flood risk is taken into account at all stages in the planning process. Flood Risk is given due consideration within the Sustainability Strategy of the CAAP.

Is the plan consistent with the adopted/emerging Regional Spatial Strategy (RSS), including the Panel's recommendations following the RSS Examination in Public which post-date the CAAP submission paper? [4]

The policies in the submitted CAAP are considered to be in general conformity with the emerging Regional Spatial Strategy (CD201). The Regional Planning Body, the South West Regional Assembly (SWRA) have been consulted throughout the process and their views have been taken into account. In the South West Regional Assembly's representation to the CAAP Submission Draft, it was concluded that "we find that the Swindon Central Area Action Plan is in general conformity with RPG10 and the draft RSS". The SWRA's representation noted that in particular the policies of the CAAP are in accordance with the following specific policies and requirements of the emerging RSS:

- Policy SR9
- Development Policy E
- Para 4.2.31
- Development Policy G
- Policy RE5
- Policy F1
- Policy H1
- Policy T1

The majority of the changes detailed Panel's recommendations (CD202) have no material impact on the CAAP. Swindon continues to be identified as one of the

region's "Strategically Significant Cities and Towns". The only changes that would directly relate to the CAAP are detailed below.

The Panel Report recommends deleting Policy SR9 (which sets the strategy for Swindon) and replacing it with Policy SR2.2. This recommended change is intended to better articulate the need for urban expansion to complement town centre regeneration and the role and function of Swindon. The reworded Policy SR2.2 states:

The role of Swindon should be developed by measures to:

- *support the regeneration of the central area through measures to ensure that Swindon Central Area remains the focus of economic, retail, entertainment and cultural activities;*
- *ensure that Swindon town centre shall be the focus for retail expansion, the provision of office floor space, entertainment and public services;*
- *upgrade the higher educational facilities to ensure the availability of the higher skills required for economic growth;*
- *improve the general environment to make the town a more attractive place to live and work in; and*
- *ensure that the planning of the proposed urban extensions reflect the need to ensure the renaissance of the central area.*

The CAAP accords with, and will help deliver the aspirations of this amended Policy.

Another recommended change is to Policy F1: Flood Risk. The Panel Report recommends that Policy F1 should direct DPDs to have regard to the RFRA. The Council would note that the Swindon SFRA (CD114) has been prepared having full regard to the RFRA.

Para 6.9 of the Panel Report recommends that the requirement that 30% of dwellings should be affordable should be substituted with 35%. This has direct implications for the CAAP. The CAAP makes references through the document to the fact that 30% of new housing will be expected to be affordable (Pages 75, 80, 88, 106 and 110). In the absence of any assessment as to whether a 35% requirement would be deliverable in Central Swindon, and given that delivering 30% within the Central Area is already a challenging target, (as noted at Policy H10 of the Local Plan (CD101)), the Council would not wish to alter this requirement to 35% at this stage. However, this requirement would be reassessed in any future review of the CAAP, should the final RSS settle on this figure.

What regard has been had to the relevant plans, policies and strategies of neighbouring planning authorities when considering Swindon's role in the regional/sub-regional context? Do any cross-boundary issues arise from competition with other regional centres and aspirations for Central Swindon to be "a destination of choice"? If so, how does the plan address these issues? [6]

Swindon lies at the north-eastern tip of the south west region. Oxfordshire lies to the east, Gloucestershire to the north and Wiltshire to the south and west. There are a number of cities and large towns in close proximity to Swindon, including Reading, Bath, Oxford, Cheltenham, Gloucester and Bristol. All of these locations are the subject of redevelopment schemes at their centres. The regeneration of many of these centres is being guided by an Area Action Plan.

Central Swindon is failing to fulfil its role as the civic centre of one of the region's "Strategically Significant Cities and Towns" and as a consequence, fails to provide a proper focus for the town. It is not the intention of the CAAP that Swindon should be usurping neighbouring centres as a retail/leisure destination. Swindon suffers a significant trade leakage to surrounding centres, which is clearly unsustainable. The intention is to retain more of the available expenditure within the town and help reduce movements to other centres. The Donaldson's Retail and Leisure Study 'Recap Model', which forms Appendix 2 to the Study, shows that there is significant retail trade leakage to surrounding centres. The Donaldson's Study also notes at Para 8.6 that whilst Swindon is a popular location for pubs and clubs, a significant amount of trade leaks out to surrounding towns such as Chippenham and Cirencester.

The aspiration is for Central Swindon to become a properly functioning centre for the Swindon sub-region, not to usurp other centres. The Objective of the CAAP to enable and ensure "Central Swindon is a destination of choice within the region" has been drafted with this context in mind.

Neither the South East England Regional Assembly nor the South East of England Development Agency or any of the authorities that adjoin Swindon Borough have objected to the approach being undertaken within the CAAP.