



Report to Swindon Borough Council

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an Inspector appointed by the Secretary of State
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PLANNING AND COMPULSORY PURCHASE ACT 2004

SECTION 20

**REPORT ON THE EXAMINATION INTO THE
SWINDON CENTRAL AREA ACTION PLAN**

DEVELOPMENT PLAN DOCUMENT

Document submitted for examination on 28 December 2007

Examination hearings held between 24 June and 7 July 2008 at
The Pilgrim Centre, Regent Place, Swindon

File Ref: LDF 000795

1 Introduction and Overall Conclusion

- 1.1 Under the terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004, the purpose of the independent examination of a development plan document (DPD) is to determine:
 - (a) whether it satisfies the requirements of s19 and s24(1) of the 2004 Act, the regulations under s17(7), and any regulations under s36 relating to the preparation of the document.
 - (b) whether it is sound.
- 1.2 This report contains my assessment of the Swindon Central Area Action Plan (CAAP) Development Plan Document (DPD) in terms of the above matters, along with my recommendations and the reasons for them, as required by s20(7) of the 2004 Act.
- 1.3 Several changes are necessary to satisfy the 2004 Regulations. The title page should be amended by adding the phrase "Development Plan Document" and the CAAP's date of adoption in order to comply with Regulation 13(3) of the 2004 Regulations (**IC1**). The list of Local Plan policies to be superseded by policies in the CAAP should be moved from the technical appendices (which will not be adopted) and incorporated into the adopted DPD as an appendix in order to comply with Regulation 13(5) (**IC2**). The Proposals Map should include National Grid Lines and References to comply with Regulation 14(b) (**IC3**). Subject to these changes, I am satisfied that the CAAP meets the requirements of the Act and Regulations.
- 1.4 My role is also to consider the soundness of the submitted CAAP against each of the tests of soundness set out in Planning Policy Statement 12: *Local Development Frameworks 2004* (PPS12). A more recent version of PPS12 was published during the examination and this is a material consideration. However, as the examination was in progress prior to publication of the new PPS12, I have assessed the CAAP in the light of the tests of soundness set out in the earlier version of PPS12.
- 1.5 In line with national policy, the starting point for the examination is the assumption that the local authority has submitted what it considers to be a sound plan. The changes specified in Annex A to this binding report beginning with the prefixes **PEC** (pre-examination changes), **PC** (additional changes proposed by the Council during the hearing sessions) and **IC** (Inspector changes) are made only where there is a clear need to amend the document in the light of the soundness tests. Annex B is a change to the boundary of the proposed location of the Bus Exchange at Fleming Way. None of these changes materially alter the substance of the overall plan and its policies, or undermine the sustainability appraisal and participatory processes undertaken.
- 1.6 I have attempted to identify as many consequential amendments as possible that may follow from the recommended changes, but despite this it may well be that further minor editorial changes become necessary. In the event of any doubt, I am content for policy numbering, paragraph

numbering, spelling and grammar to be amended by the Council before the CAAP is adopted, so long as the DPD's underlying meaning is not altered.

- 1.7 Changes with the prefix 'MC' in Annex C are minor changes to the policies, text and Proposals Map to rectify minor errors, to bring the CAAP up-to-date with recent developments and to improve clarity and understanding. Whilst these do not have a significant bearing in the soundness of the CAAP, I endorse them as improving its overall structure.
- 1.8 Not all of these changes have been advertised or consulted upon and their effect on the Sustainability Appraisal has not been reviewed. However, I am satisfied that none of the changes have any significant effect on the essential strategy of the CAAP or its provisions. They merely clarify the way in which the strategy and provisions will be carried through. In my view advertisement, consultation and review of the Sustainability Appraisal is unnecessary in these circumstances.
- 1.9 My report firstly considers the procedural tests, and then deals with the relevant matters and issues considered during the examination in terms of the tests of conformity, coherence, consistency and effectiveness. My overall conclusion is that the CAAP is sound, provided it is changed in the ways specified. The principal changes are needed to ensure that
 - (a) the development strategy and principles provide a coherent framework reflecting local needs and aspirations
 - (b) the design criteria are clear and reflect local distinctiveness
 - (c) there are clear mechanisms to monitor/review the canal proposal
 - (d) the monitoring of the sustainability strategy is comprehensive
 - (e) the overarching transport and movement strategy is clear
 - (f) the proposed increase in parking is based on robust and credible evidence, and is consistent with other policies
 - (g) Master Plans for development areas within the Retail Core are reasonably flexible to deal with changing circumstances
 - (h) the policy for the Promenade Cultural Quarter is consistent with the Local Plan and supporting SPD
 - (i) there are clear mechanisms to monitor/review the proposal for a university campus at North Star
 - (j) the policy relating to future use of the Mechanics Institute is the most appropriate in all circumstances
 - (k) the housing figures and affordable housing, housing mix and tenure requirements are based on robust and credible evidence
 - (l) the Proposals Map meets regulatory requirements, and the Proposal Map and maps in the CAAP document are consistent, accurate and up-to-date
- 1.10 The report sets out the detailed changes required, including those suggested by the Council, to ensure that the plan meets all the tests of soundness.

Procedural Tests

Test 1 - Consistency with Local Development Scheme

- 2.1 The CAAP DPD is contained within the 2nd Review of the Council's Local Development Scheme (LDS), approved in December 2007. In the LDS, the CAAP is shown as having a submission date of December 2007. The listing and description in the LDS matches the submission document. Soundness test i of paragraph 4.24 of PPS12 is therefore satisfied.
- 2.2 In accordance with the LDS, the CAAP has been produced in advance of the Core Strategy, which is not an approach recommended in PPS12. However, the regeneration of Swindon's Central Area is identified by the Council as an urgent priority. It is considered essential to allow Swindon to fulfil its function as a strategically significant town and support its role as a New Growth Point. Without the CAAP, regeneration will have no focus or context beyond the outdated Regeneration Plan and the adopted Local Plan, which is not sufficiently specific to enable the appropriate management of regeneration.
- 2.3 Producing the CAAP in advance of the Core Strategy is supported by the Government Office for the South-West (GOSW). The CAAP is set in the context of the relatively up-to-date Swindon Borough Local Plan 2011 and Wiltshire and Swindon Structure Plan 2016, both adopted in July 2006, the emerging Core Strategy (CS) which is due to be submitted for examination early in 2009, and the draft Regional Spatial Strategy (RSS) for the South West, the final version of which is expected to be published in 2009, following responses to the Secretary of State's proposed changes.
- 2.4 Taking these factors into account and having regard to the highly sustainable location of Swindon's Central Area, it is my opinion that the early production of this geographically focussed document meets a current need to harness funding and developer interest, and would not prejudice or pre-empt the development of options and policies of the Core Strategy for the Borough in relation to development expected to take place before 2016. The CAAP may need to be reviewed when CS and RSS are in place to ensure that development in the medium/longer term (2016–2026) is in conformity with strategic guidance.

Test 2 - Compliance with Statement of Community Involvement (SCI) and associated regulations

- 2.5 Concern has been expressed about certain aspects of the adequacy of the consultation process with Swindon's residential communities, raising the issue of whether the Council has complied with the spirit of the SCI. Particular concerns relate to the level of financial resources targeted at community engagement, the alleged delay in setting up a Community Forum and the delay in establishing the Railway Village Action Group as a vehicle to consult local residents on major initiatives in the area. There are also concerns that some of the consultation methods employed were not appropriate for the complex issues involved and that notice of, and time for discussion at, public meetings was inadequate, thereby

undermining opportunities for a fully informed debate and giving rise to criticisms of “token” consultation.

- 2.6 The methodology and opportunities for consultation relating to the CAAP are set out in the SCI, which has been examined and found sound by the Secretary of State. The SCI was adopted by the Council in January 2007 before the examination hearings took place. It is evident from the documents submitted (including the Regulation 28 and 31 Statements and the Self-Assessment) that the Council has used the relevant consultation techniques specified for Area Action Plans in accordance with the SCI.
- 2.7 Not all avenues for community engagement were established at the outset of the plan’s production. However, information about the CAAP and opportunities for community involvement were publicised in the Council’s publication *Swindon News* (distributed to all borough residents) and in the local press. In addition, exhibitions and roadshows in the town centre provided opportunities for the general public and local residents to discuss issues with Council representatives.
- 2.8 The Railway Village Action Group, identified in the CAAP as a key sounding board on initiatives impacting on the area, has yet to materialise. However, much of the land and property in the Railway Village is Council-owned. Information on the CAAP was included in the *Housing Matters Newsletter* distributed to residents in the area and delivered at presentations in the Railway Village organised via the Council’s Housing Department, thereby providing alternative avenues for local residents to find out about, and express views on, the CAAP.
- 2.9 The evidence before me indicates a range of opportunities for community involvement at all stages in the production of the CAAP. Based on this evidence, I consider that the legal requirements set out in the Regulations have been satisfied, including the minimum requirements in respect of consultation at the Issues and Options stage of the process, which was carried out before the SCI was adopted. Test ii has therefore been met.
- 2.10 I acknowledge the frustration on this issue felt by particular local groups and individuals. However, I am mindful that the CAAP is the first DPD to be produced in Swindon, and the process has been a learning experience for all. The Examination revealed that some of the concerns expressed by the local community are underpinned by a lack of familiarity with the current development plan system. It also highlighted the importance of managing the public’s expectations about what is realistic and achievable in terms of community involvement, having regard to the financial and staff resources available, and the need to reach a consensus view. I am confident that the lessons learned from the CAAP will benefit the production of future DPDs in the borough.

Test 3 - Sustainability Appraisal

- 2.11 Alongside the preparation of the DPD, it is evident that the Council has carried out a parallel process of sustainability appraisal (SA) and Strategic Environmental Assessment (SEA). The SA Reports for the Issues and

Options and Preferred Options stages of the CAAP, together with the Final Report on the Submission Paper were submitted with the DPD. Test iii has therefore been met. In accordance with the Habitats Directive, I am satisfied that as a result of the screening exercise carried out on behalf of the Council, the CAAP is unlikely to have any significant effects on the five Special Areas of Conservation which lie outside, but within 15km of the CAAP boundary. There is therefore no need for an Appropriate Assessment. Accordingly, I am satisfied that the procedural tests i, ii and iii have all been satisfied.

Conformity, Coherence, Consistency and Effectiveness Tests (Soundness Tests 4-9)

Conformity – Test 4 and 5

- 2.12 The South West Regional Assembly has indicated that the DPD is in general conformity with Regional Planning Guidance (RPG 10) and the Draft Regional Spatial Strategy for the South West.
- 2.13 The vision and objectives of the CAAP mirror the 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” set out in the Community Strategy 2004-2010¹. The CAAP has also had regard to the recently adopted Community Strategy², in particular, improvements to the town centre retail offer; the delivery of high quality buildings incorporating sustainable design and construction principles; the aspiration for the town to have its own university; promoting investment in leisure and cultural facilities; safeguarding and enhancing the built and natural environment, including improvements to the public realm in general and environment of residential areas in particular; and encouraging public transport, cycling and walking as alternatives to the car.
- 2.14 Accordingly, I consider that conformity tests iv and v have been satisfied. I turn now to consider the tests of coherence, consistency and effectiveness, starting with an overview of the DPD before considering specific issues.

3 *Coherence, Consistency and Effectiveness Tests (Tests 6-9)*

An overview of the DPD

- 3.1 Part I of the CAAP sets out the aim and objectives for Central Swindon and the strategic framework relating to Design, Sustainability, the Public Realm, and Transport and Movement. Part II identifies five distinct character areas within Central Swindon which are subject to the specific area-based policies set out in this section. Policies in Parts I and II include summaries setting out how they will be delivered with reference to key players, land ownership, priorities, infrastructure requirements, delivery mechanisms and quality assurance, as appropriate. Part III-The

¹ *Our Swindon Our Community Our Future - A Community Strategy for Swindon 2004-2010*

² *Swindon Sustainable Community Strategy – A Shared Vision for Swindon 2008-2030*

Implementation Plan is a separate document which provides information about detailed quantum and phasing of development (with reference to the supporting evidence base), strategic, transformational and community infrastructure requirements, and mechanisms for delivery, quality assurance and monitoring.

- 3.2 Read as a whole, I consider that the CAAP provides a level of detail sufficient to establish the key features of the development projects proposed for the period up to 2016; how and when proposals will happen; the scale of different types of development on individual sites and approximate timescales for delivery.
- 3.3 Concerns have been expressed about the extent of the area covered by the CAAP, including views that Old Town should be excluded from the Central Area, and that the decision to include some residential areas within the CAAP boundary, but not others, is somewhat arbitrary.
- 3.4 The wide selection of restaurants, small independent shops and businesses in Old Town provide a very different shopping experience to that offered in the Town Centre and by the Great Western Designer Outlet Centre. Improving linkages between these three retail areas is key to achieving the critical mass needed to encourage shoppers to visit Central Swindon, rather than competing centres outside the borough and out-of-centre retail destinations within Swindon. In terms of residential communities, the CAAP includes areas where the impacts of redevelopment will be felt the most strongly. Swindon's middle ring road provides an easily identifiable, defensible boundary. Taking these matters into account, I conclude that the CAAP boundary provides a sound basis for the planning of the Central Area.
- 3.5 I am also mindful that the evidence supporting the DPD is based on the submitted CAAP boundary, likewise the sustainability appraisals and public consultation undertaken at each stage leading to the DPD submission. Altering the CAAP boundary without further consultation, sustainability appraisal or review of the evidence base would make the whole plan unsound, having regard to tests ii and iii.

Issue 1 – Whether the aim, objectives, development strategy and principles provide a clear and coherent framework for the CAAP policies which reflects local issues and aspirations

- 3.6 As drafted, the Council's Aim for the Central Area lacks a local dimension. The lack of local distinctiveness is also evident in the Development Principles which are summarised very briefly in the Development Strategy. In addition, the relationship between the spatial strategies and the area-based policies lacks clarity. I consider the following changes necessary to make the plan sound, for the reasons stated.
- 3.7 The Council's rewording in **PEC1** clarifies the relationship between the core objectives, development principles, spatial and area-based policies. Amendments to the Development Principles text in **PEC2** set the Development Strategy within the context of regeneration; clarify the

reasons why a step change improvement is needed in the Central Area and explain how the Development Principles will provide the overarching building blocks to deliver this improvement. Taken together, these amendments add the local dimension to the Council's vision for Central Swindon which is lacking at present.

- 3.8 Subject to the changes identified, I conclude that the DPD will provide a clear and coherent framework for the CAAP policies which reflects local issues and aspirations and satisfies test vii.

PEC1	Clarification of the relationship between core objectives, development principles, spatial and area-based policies
PEC2	Sets the development strategy in the regional context, the reasons underpinning the need for a step change in improvement and how the development principles will help deliver this improvement

Issue 2 – Whether the design strategy will deliver high quality and innovative design which is locally distinctive and appropriate in its context

- 3.9 The CAAP seeks to promote good design which creates and reinforces a distinct local identity and a sense of place. However, the submitted document relies on a brief bullet point summary of generic urban design principles which offer limited practical guidance on how to achieve the Council's objective in the Central Area of Swindon. Whilst stressing the importance of the local context, the paragraphs which set the scene by describing the five character areas vary widely in content and the level of detail ascribed to each area, and consequently lack coherence.
- 3.10 The following changes are necessary to make the document sound for the reasons given. **PEC3** clarifies that the guidance relates to the look and function of new development at all scales. The design principles to be addressed in new development are expanded and explained in **PEC4**, and their application to the local context is clarified in **PEC5**. The content and detail of the revised paragraphs on individual character areas (**PEC6, PEC7, PEC8, PEC9 and PEC10**) are consistent; each including a summary of the existing townscape character and general design aspirations for the area. The revisions to the design criteria in Policy I, as set out in **PEC11**, flow from the preceding changes. The additional design criterion in **PC1** will ensure that sustainable waste management requirements are included in Policy 1, for consistency and completeness.
- 3.11 As well as general design criteria, Policy 1 encompasses design advice specifically relating to tall buildings. The criteria for assessing such proposals are based on guidance published by the Commission for Architecture and the Environment (CABE). In addition, a number of area-based policies in Part II of the CAAP refer to the potential to locate tall buildings where this would accord with good urban design principles.

- 3.12 It would have been helpful had the Council undertaken a comprehensive urban design study to identify locations where tall buildings might enhance the overall townscape, provide contextual information on general buildings heights in the central area and inform the definition of a tall building. However, as the CAAP does not seek to identify sites for tall buildings, I do not regard the absence of such a study as fundamental to the soundness of the plan. Nor does it justify changing the plan to delete the tall buildings design criteria. The resulting policy vacuum would serve no useful purpose bearing in mind the acknowledged need for tall buildings design guidance in the Central Area.
- 3.13 Subject to the changes specified, I conclude that the design strategy will deliver high quality and innovative design which is locally distinctive and appropriate in its context, thereby satisfying soundness test vii.

PEC3	Clarifies the scope of the design guidance
PEC4	Elaborates the design principles
PEC5	Clarifies the application of design principles to the local context
PEC6	Revisions to the Town Centre Character Area
PEC7	Revisions to the Old Town/Victoria Road Character Area
PEC8	Revisions to the Existing Residential Communities Character Areas
PEC9	Revisions to the North Star Character Area
PEC10	Revisions to the Railway Heritage Character Area
PEC11	Changes to Policy 1 High Quality and Innovative Design
PC1	Additional design criteria to Policy 1 relating to sustainable construction requirements

Issue 3 – Whether it is appropriate at this stage to safeguard land for a canal through the centre of Swindon, having regard to alternative routes and further work required, and whether the mechanisms for monitoring/review are clear

- 3.14 The aspiration to reinstate a canal in Central Swindon is not new; part of the original canal route is safeguarded in the adopted Local Plan, but only as a spur terminating short of the town centre. Policy 4 safeguards land for the development of a canal through Central Swindon as shown on the Proposals Map, together with an indicative area of search for a canal basin in the town centre, in the Fleet Street/Upper Bridge Street area. The canal basin would terminate Phase 1 of the scheme to bring the canal into the town centre from Kingshill (completion by 2016). The stretch between the canal basin and the Bruce Street Bridges on the northern periphery of the central area would be completed after 2016. The long

term aspiration is to link the Wiltshire and Berkshire Canal and the North Wiltshire Canal and on to the wider canal network.

- 3.15 At the *Issues and Options* stage, the Council sought views on the principle of developing a canal route through the central area, rather than a specific route. Several options for the alignment of the canal were considered and discarded before the Council identified a possible route through the central area (feasibility to be assessed) which was put forward at the *Preferred Options* stage. This route arose out of discussions with the Wiltshire and Berkshire Canal Trust (a key player in the delivery of the project). However, the wider public was not specifically invited to comment on alternative routes for the canal prior to this stage, giving rise to criticism.
- 3.16 There is no point producing and consulting on options which are unrealistic. However, the reasons for taking such a view must be fully explained and justified. In this case, the Preferred Options paper refers to other routes considered for the canal alignment and the reasons why they were discarded. The existing canal terminal at Kingshill and the point where the canal will cross the railway are fixed; route options between these fixed points are very limited. Reinstating the canal on part, or all, of its original line through the central area is not viable due to existing development in some areas, including areas/buildings of historic interest, and the conflict with regeneration initiatives elsewhere. Routes which bypass the central area, for example following the River Ray corridor, would fail to deliver the Council's aspirations in the built-up area of the town centre, as well as giving rise to other problems. The Council has therefore come to the view that there is no realistic alternative to the preferred route, other than minor variations to the alignment through Shire and Erin Courts, close to the Kingshill terminus.
- 3.17 Nevertheless, the Preferred Options paper makes it clear that proposals in the plan are by no means final, and will be shaped by consultation responses. Consultees were not deterred from commenting on the discarded routes or suggesting alternative routes. Indeed, two representors suggested variations based on the original canal alignment, and I am satisfied that the Council gave these views proper consideration. Taking all these matters into consideration, I do not regard the absence of general consultation specifically in relation to alternative canal routes as critical to the soundness of the plan.
- 3.18 The evidence supporting the canal scheme, including the Halcrow Feasibility Study, indicates that the proposed route is technically feasible, would maximise the profile and benefits of the canal, form a focal point for the town, stimulate regeneration in the central area and make the most of a valuable asset. There being no realistic alternatives before me, I find the proposed alignment the most appropriate in the circumstances, as required by test vii.
- 3.19 Nevertheless, before the scheme can progress, further work is required on matters such as water supply, detailed design, full costings, funding, major service diversions, significant changes to the road transport network around the route and its effect on the functioning of the wider

transportation network. In addition, consideration must be given to measures designed to minimise disturbance to residents and traders during construction, and a decision must be taken about where the canal basin will be located within the indicative search area.

- 3.20 There are concerns that the canal proposal might not be deliverable in the time period envisaged given the nature and amount of work to be carried out and the significant challenges still to be addressed. Safeguarding land for the canal in the CAAP could result in a prolonged period of uncertainty for owners/occupiers/residents of property and land close to the canal route and in the canal basin search area. There are fears that this might prejudice or delay the implementation of other regeneration initiatives in the vicinity of the canal and basin, and blight the affected land.
- 3.21 Work is well advanced on the borough-wide transport study which is considering changes to the transportation network, both with and without the canal scheme. A Canal Task Group has been set up to implement the project within the Transport Strategy; assess the value of the canal with or without links to the wider network; evaluate potential funding sources and produce an implementation plan, with resource needs. Work is progressing on a Master Plan for the Fleet Street/Upper Bridge Street area which will firm up the canal basin's location and design. It is anticipated that the Master Plan, Funding and Transport Strategies will be in place within twelve months of the CAAP's adoption, with detailed design work to be completed the following year.
- 3.22 This timescale has informed Policy 4, which provides for an "early review" of the canal allocation if there is insufficient progress in the detailed design of the scheme and implementation plan within two years of the CAAP being adopted. Such an approach would ensure flexibility to deal with changing circumstances, as required by soundness test ix. There will not be a prolonged period of uncertainty provided progress is monitored systematically and the allocation reviewed in the event that a serious problem comes to light within two years of the CAAP's adoption. As noted by the Council, "Blighted Land" is defined in planning legislation; this definition would not apply to land affected by the canal safeguarding policy. However, the submission document does not specify how progress will be monitored; the milestones/targets it will be measured against, or what will constitute "insufficient" progress likely to trigger a decision to delay or abandon the project.
- 3.23 In response to these concerns, the Council clarified that progress will be monitored by the Canal Task Group, reporting to the Council's Cabinet. The anticipated timescales for adopting the Master Plan, Transport Strategy and Funding Strategy, and the production of the detailed design could be specified as targets in the Implementation Plan, and monitored through the Annual Monitoring Report (AMR). Three factors with the potential to trigger a decision to delay or abandon the proposal were identified: (a) if insurmountable constraints are identified when further work is carried out to inform the detailed design of the scheme, (b) if costs spiral beyond budget, or the Council fails to secure a robust funding strategy, and (c) failure to secure public support for the detailed

proposals. If monitoring highlights any of these circumstances, a review of the canal allocation would be triggered. If a decision was taken to abandon the canal proposal as a result, then alternative public realm improvements along the safeguarded route and at the canal basin location could be considered as part of the review.

- 3.24 Revisions to Policy 4 and Section 6 of the Implementation Plan on these lines, as set out in changes **IC4** and **IC5**, would clarify responsibility for monitoring; provide targets/indicators against which progress could be measured, and ensure that the Canal allocation is reviewed within a specified time frame in the event of insurmountable technical constraints, funding problems or failure to secure public support. Subject to these changes, I conclude that this element of the plan meets soundness tests viii and ix.

IC4	Change Policy 4 to clarify responsibility for monitoring progress on the canal proposal, and require the allocation to be reviewed within two years of the CAAP's adoption in the circumstances specified
IC5	Insert target dates in the Implementation Plan for milestones in the progress of the canal proposal

- 3.25 In terms of the evidence base, the economic benefits arising from canal development in town centres are supported by financial information which has been updated using the retail price index. Whilst noting concern about this approach, there is nothing before me to suggest that it is unsound having regard to test vii.

Issue 4 – Is there a clear and robust evidence base to support the development of a decentralised sustainable energy supply in Swindon's Central Area?

- 3.26 The provision of a decentralised sustainable energy supply scheme has the potential to play an important role in supporting the Council's strategy for sustainable construction. Although the CAAP highlights Central Swindon's suitability for the development of such a scheme, it does not explain the reasons why.
- 3.27 The Council has drawn my attention to guidance published by the Town and Country Planning Association³ which indicates that town and city centres represent the most significant opportunities for large scale deployment of sustainable decentralised energy sources to a wide range of customers. The high density of development and the mix of uses present in such areas generate high heat loads for most of the year, as well as maximising the potential for energy and heat demands and a need for summer cooling. The proximity between the sources and users of energy make supply chain ultra efficient. Developing decentralised energy sources in conjunction with large scale regeneration schemes, such as those coming forward as part of the CAAP, can significantly reduce

³ *Community Energy: Urban Planning for a Low Carbon Future*

infrastructure costs and disruption. Case studies of combined heat and power (CHP) schemes in town centres on a scale similar to Swindon's Central Area have reduced energy costs and CO₂ emissions.

- 3.28 Taking all these matters into account, I conclude that the evidence base for developing a decentralised sustainable energy supply in Central Swindon is sound as required by test vii.

Issue 5 – Are there clear mechanisms to monitor progress on the delivery of the Sustainability Strategy?

- 3.29 The five key elements of the Sustainability Strategy are sustainable construction (the Swindon Standard, set out in *Swindon Sustainable Building Design and Construction* Supplementary Planning Document adopted in January 2008, now being taken forward as part of the Core Strategy); sustainable energy supply; sustainable water and waste management and green roofs.
- 3.30 The Local Area Agreement monitors per capita CO₂ emissions, a catch-all indicator for emissions from housing, industry and transport. Whilst not focussed specifically on energy supply, it nevertheless provides a broad indicator of the success of the policy. Renewable energy and heat supply elements of the strategy are monitored from a regional perspective by RegenSW and reported to the Regional Planning Body. Water management is monitored through the analysis of flood risk assessments (FRA), updating the Environment Agency Flood Risk Maps and reviews (usually every three years) of the Strategic FRA. The landfill indicator in the Local Area Agreement is used to monitor progress on waste management. Although suggested as potential indicators, I see no need to duplicate this monitoring in the DPD, provided that these indicators are monitored at the CAAP area level wherever possible.
- 3.31 The CAAP Implementation Plan includes targets and indicators for some elements of the Swindon Standard, but not in relation to major developments incorporating passive solar design principles or residential development designed to the Lifetimes Home Standard. In addition, there are no stated targets/indicators for Green Roofs.
- 3.32 Change **PC2** inserts targets and indicators for these elements of the Sustainability Strategy into the Implementation Plan and makes the plan sound in this respect, having regard to test viii.

PC2	Insert targets and indicators for passive solar gain, Lifetimes Homes Standards and Green Roofs in the Implementation Plan
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Issue 6 – Whether Policy 5 and the supporting text clearly articulates the overall strategy for transport and movement in the central area and its relationship to regeneration schemes

- 3.33 The CAAP sets out the aims of the transport strategy for the town centre⁴ and methods to address issues relating to supply and demand so as to improve the capacity and performance of the existing transport network⁵. It includes policies which deal with specific elements of transport and movement in the Central Area i.e. traffic management, public transport, pedestrian and cycle movement, parking, the railway and transport infrastructure needs (policies 6-11 inclusive). However, although it purports to be the Transport Strategy, Policy 5 does not provide a strategic framework for the policies which follow, and the overarching transport and movement strategy is unclear from the supporting text.
- 3.34 This policy vacuum is addressed in the Council's statement to the Hearing, which was submitted in response to my concern. The text of this statement has been combined with elements from *Guiding Principles for Transport in Central Swindon* to form a new section *Transport and Movement Strategy for Central Swindon* supporting a revised Policy 5 focusing on the strategic assessment of development proposals **(IC6)**.
- 3.35 A consequence of this change is that the impact of proposals on the immediate highway and transport networks needs to be dealt with in a separate policy at the end of the section *The Wider Town Centre Road Network*. I have included references to Transport Statements and Assessments as well as Travel Plans in the new policy for the sake of completeness **(IC8)**. The supporting text has been expanded to require an evidence base to be produced early in the process, rather than at the application stage, since this is key to ensuring that the CAAP can be delivered in accordance with its sustainable objectives **(IC7)**.
- 3.36 Securing highway improvement works and mitigation measures arising from development proposals is a matter which flows on logically from new Policies 5 and 6. I therefore recommend that the section *Transport Infrastructure and Developers Contributions* and Policy 11 (which deals with these matters) be moved from the end of the transport chapter where it is in the submitted document and placed to follow on from new Policy 6. It would need to be renumbered as Policy 7 and all subsequent Policies would need to be renumbered accordingly **(IC9)**.
- 3.37 Subject to the changes to address concerns about coherence (test vi), I conclude that the plan is sound in relation to the overarching transport and movement strategy and its relationship to regeneration proposals.

IC6	New Transport and Movement Strategy section and revised Policy 5
IC7	Insert additional requirement for Transport Statement or

⁴ *Strategy for Transport in the Town Centre: Swindon 2030*
⁵ *2030: A Vision for Transport*

	Assessment based on evidence gathered at an early stage
IC8	Insert new Policy 6 Development and the Highway and Transport Network
IC9	Move section on Transport Infrastructure and Developers Contributions to follow new Policy 6, and renumber subsequent Policies

Issue 7 - What is the evidence to support the increase in parking proposed in the Central Area, and is this increase consistent with other policy objectives?

- 3.38 Swindon currently has about 6,000 car parking spaces distributed around the Central Area in surface level and multi-storey car parks. The intention is to consolidate the Central Area car parks, resulting in fewer but larger car parks better located to reduce the amount of traffic circulating in the town centre. Replacement parking will be needed to compensate for the loss of several car parks earmarked for redevelopment and additional public car parking will be required to serve the demands arising from new development in the Central Area.
- 3.39 The CAAP identifies a need for 9,000 car parking spaces to be provided in the period up to 2026 to accommodate the level of growth identified for Swindon. A large (1,000 space) car park is proposed to the north of the railway line as part of the Swindon Central development scheme. 1,000 spaces are proposed at Park and Ride sites located outside, but on key radial routes into, the Town Centre. The Council has subsequently pointed out that the latter would be in addition to 1,000 spaces already provided at Park and Ride sites; existing provision which was not referred to in the Submission Paper or mentioned in evidence at the hearings. For clarity, I have added this information into the section *Number of Spaces Required (IC10)*. Taking into account these previously unidentified spaces, the CAAP identifies the need for a net increase of 2,000 spaces both within and outside but serving the Central Area, in the period up to 2026.
- 3.40 Evidence supporting the future demand for parking comes from a number of sources. The highest level of demand forecast in the 2002 Swindon Central Area Transportation Study (SCATS) suggests a maximum requirement for 7,650 spaces for the period up to 2030, i.e. fewer than 2,000 additional spaces overall. In 2006, the Local Transport Plan 2006-2011 estimated that by 2016 an additional 1,500 to 2,000 spaces may be required in the Central Area itself. This is considerably more than the provision of 1,000 spaces extra currently proposed by the CAAP within the Central Area to meet demand over a longer time frame.
- 3.41 It is unclear how this range of forecasts, which cover different timescales and appear to be based on different assumptions, fed into the identified need for 8,000 spaces specified at the Preferred Options stage of the CAAP in April 2007, or the forecast need for 9,000 parking spaces which appears for the first time in the CAAP Submission Paper (December 2007). I can find no evidence to support the revised parking requirement,

even though it represents a significant increase on the number of public parking spaces proposed prior to submission. My concern is reinforced by the fact that the SA and Supporting Statement dated December 2007, submitted in tandem with CAAP Submission Paper, both refer to a projected parking demand of 8,000 spaces. The only reference to a long term requirement for 9,000 spaces is in the leaflet *Strategy for Parking* published for consultation in 2007 alongside *2030: A Vision for Transport* and the associated transport strategy for the town centre. However, this document does not indicate why such an increase over and above earlier CAAP forecasts is considered necessary. All these matters lead me to conclude that the projected need for 9,000 parking spaces as set out in the CAAP is not founded on a robust and credible evidence base.

- 3.42 The CAAP acknowledges that successful regeneration cannot be accommodated by allowing unrestrained use of the private car. A balance needs to be struck between restraint and a level of parking provision that will not stifle development or inadvertently prejudice the regeneration of the Central Area. This balance has to be achieved in the context of transport priorities based around reducing car dependency through a shift to alternative modes of transport. There are concerns that increasing parking spaces to the level envisaged in the CAAP will not achieve this modal shift.
- 3.43 The Council's Regulation 31 Statement response to this criticism accepts that the overall number of parking spaces will increase, but argues that a 25% increase in Central Area parking spaces (from 6,000 to 8,000) compared to 50% growth in commercial/leisure/retail floorspace will result in modal shift. At face value, this argument has some merit. However, the figures do not bear close scrutiny. Based on the numbers quoted, a net gain of 2,000 spaces represents an increase of 33% on the current level of Central Area parking provision, not 25% as claimed by the Council. As the correct figure is closer to the 50% growth anticipated in commercial/leisure/retail floorspace, the likely degree of modal shift would be reduced accordingly.
- 3.44 The argument is further confused by calculating the % increase in parking on a projected demand for 8,000 spaces, rather than the 9,000 spaces specified in the submitted CAAP. Using the existing provision (7,000 spaces) and the forecast demand (9,000 parking spaces) the additional spaces proposed represents an increase of about 28%. This scale of increase would be likely to result in modal shift from cars to alternative forms of transport if growth in commercial/leisure/retail floorspace increases by 50% over the same period as anticipated. However, this assessment assumes that the identified need for 9,000 spaces is soundly based. I have not found it so for the reasons identified. In these circumstances, there is a risk that the parking level proposed might not act as an incentive to use alternative transport modes. Consequently, I am not persuaded that a parking strategy based on this level of forecast demand is consistent with transport policies which seek to reduce car dependency through a shift to sustainable travel options. In this respect, I conclude that the parking strategy is unsound having regard to test vi.

- 3.45 In the light of my conclusions set out above, and in order to make the plan sound, I consider it necessary to amend the text supporting Policy 9 to delete references to specific numbers of parking spaces being needed to accommodate future growth and to be provided at Park and Ride sites (which, in any event, are located outside the CAAP boundary). The changes to the text supporting Policy 9 Parking Strategy which flow from this recommendation are set out in **IC10**.
- 3.46 However, I am satisfied that there is justification to provide at least 1,000 additional spaces in the Central Area in the period up to 2026, based on the evidence before me. I acknowledge the logic of providing 1,000 new spaces in the strategic car park on land to the north of the railway line, where it can intercept drivers entering the Central Area from the north thus helping to remove circulating and through traffic from the town centre. I think it likely that a strategic car park in this location, close to the rail station, would encourage greater use of the train as an alternative to the car. I am mindful that a car park of this size and in the location proposed was subject to consultation and sustainability appraisal at the Preferred Options stage and in the CAAP Submission Paper. For these reasons, I am content for this element of Policy 9 to remain as submitted.
- 3.47 Subject to the recommended change, I conclude that the evidence to support the need for at least 1,000 spaces in the Central Area to meet parking demands up to 2016 is sufficient to satisfy soundness test vii, and is this level of provision is consistent with other policy objectives and therefore sound having regard to test vi.

IC10	Amend the text supporting the Policy 9 Parking Strategy to delete references to specific numbers of parking spaces, except in relation to the 1,000 space car park proposed as part of the Central Swindon development
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Issue 8 – Whether there is evidence to support the location of a bus exchange at Fleming Way, and this is the most appropriate location for this facility

- 3.48 The location of the bus exchange has been informed by a number of factors, including the requirement for good access to the town centre for the urban network of high frequency bus services, without the need to turn or reverse out of bays. The ability for passengers to interchange between urban and rural bus services requires sufficient space for rural busses to lay-over between dropping off and picking up passengers. Another space consideration stems from the need to accommodate future growth in the number and frequency of services. Close proximity to the retail core is considered critical to the bus service’s continuing success in attracting passengers. The preferred location at Fleming Way, developed in consultation with key stakeholders, satisfies all these requirements.
- 3.49 Several representors promote the option of locating the bus exchange close to the railway station, as part of a larger multi-modal transport hub. However, it became evident at the Hearing that there is insufficient land

at the railway station to satisfy the space requirements noted above. The presence of a listed wall adds a further constraint. Moreover, whilst such a location would be convenient for rail users, most of those travelling into the town centre by bus come to shop. Being further from the retail core, a bus exchange located at the railway station would be less attractive to the majority of bus users. These factors indicate that such a location is not an appropriate option. Moreover, it has not been subject to public consultation or sustainability appraisal.

3.50 For the reasons stated, I consider the proposal to locate the bus exchange at Fleming Way to be the most appropriate in all circumstances, and founded on a robust and credible evidence base. I conclude that the plan is sound in this respect, having regard to test vii.

Issue 9 – Are the Master Plan requirements for the Sanford Street Area and the Upper Bridge Street/Fleet Street area reasonably flexible to deal with changing circumstances?

3.51 Within the retail core, the CAAP requires development in the areas around Sanford Street and Upper Bridge Street/Fleet Street to be informed by comprehensive Master Plans. There are site-specific reasons why the Master Plans for these sites require in-built flexibility. In the Sanford Street area, the need to relocate or accommodate existing uses means that development is unlikely to occur until after 2011. However, the Council does not wish to hold back the regeneration of this area if a development scheme comes forward in the shorter term. To achieve this flexibility, the Council expects the Sanford Street Master Plan to show how schemes can come forward as individual development parcels. Since this requirement will influence the approach to the Master Plan, it should be specified in Policy 12 along with other requirements the Sanford Street Master Plan is expected to satisfy. Change **PC3** makes this clear.

3.52 The Master Plan for Upper Bridge Street/Fleet Street requires flexibility because the area is affected by the proposed canal route and indicative area of search for the canal basin. The Council is keen to ensure that development schemes are not held back pending completion of further work on the canal proposal or the implementation of the scheme, assuming it proceeds. On the other hand, it is important to ensure that proposals coming forward in advance of the canal do not prejudice the delivery of this scheme. Change **PC4** addresses the lack of clarity on this issue in the wording of Policy 12 as submitted.

3.53 Subject to the changes identified, I conclude that the Master Plan requirements for the Sanford Street Area and the Upper Bridge Street/Fleet Street area are reasonably flexible to deal with changing circumstances, and would satisfy soundness test ix.

PC3	Insert requirement for the Sanford Street area Master Plan to show how proposals can come forward as individual development parcels
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PC4	Amend requirements for the Bridge Street/Upper Fleet Street area Master Plan to ensure that development schemes can come forward in this area regardless of whether the canal proposal goes ahead, but without prejudicing the delivery of the canal
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Issue 10 – Whether the policy for the Promenade Cultural Quarter is consistent with the adopted supplementary planning document (SPD) and the Local Plan Policy it supports

- 3.54 CAAP Policy 13 requires development proposals to accord with the detailed planning framework set out in *The Promenade – A new Cultural Quarter for Swindon*, adopted as SPD in support of Policy CA5 of Swindon Borough Local Plan 2011. Whilst the main thrust of all these documents is to encourage the development of a cultural quarter in The Promenade, the Local Plan and the SPD both support the provision of A2 *Financial and Professional Services* in the area. However, there is no reference to A2 uses amongst the range of uses supported in this area as set out in the submitted version of Policy 13. This omission appears to have happened by accident rather than design.
- 3.55 As submitted therefore Policy 13 is inconsistent with the relevant Local Plan policy and supporting SPD. Change **PC5** inserts a reference to A2 uses, and thus addresses this inconsistency. Subject to this change, Policy 13 is sound having regard to test vi.

PC5	Insert reference to Class A2 (Financial and Professional Services) in Policy 13
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Issue 11 – Whether there are clear mechanisms to monitor/review the proposal to develop land at North Star as a university campus

- 3.56 The CAAP proposes to secure a Higher Education presence on land at North Star in the area currently occupied by Clares factory and the Oasis Leisure Centre. The precise area/location of the university campus depends on whether the existing Oasis Leisure Centre is refurbished, or the site redeveloped to provide a new regional scale leisure facility. Proposals for this area will be taken forward through a Master Plan which will allow related schemes (such as a new or improved leisure facility) to come forward in advance of the university. These requirements are reflected in Policy 16 as submitted.
- 3.57 Policy 16 also provides for an early review of the proposal for a university if insufficient progress has been made within three years of the CAAP being adopted. However, neither the policy nor the supporting text make it clear who will monitor progress on the proposal and how this will be carried out, what would constitute insufficient progress sufficient to trigger a review, and why a three year time frame has been chosen. This lack of clarity undermines the soundness of this part of the CAAP.

- 3.58 The Council's evidence clarified that progress on developing a university campus at North Star will be monitored at regular meetings between the local authority and the University of the West of England, the Council's preferred partner. As the area proposed to be safeguarded for the university is within the Council's ownership and control, land assembling should not present problems. The key to the delivery of the university is securing government funding. Failure to secure such funding would trigger a decision to delay or abandon the proposal, in which event the allocation would need to be reviewed. A funding bid will be submitted as part of the current round of the government spending review (2008-2011). This has informed the time frame to review progress on the university proposal.
- 3.59 Change **IC11** takes this information into account and thereby addresses the lack of clarity in Policy 16 as submitted. Subject to this change, I conclude that there would be a clear mechanism to trigger a review of the proposal to develop land at North Star as a university campus, as required by test viii.

IC11	Amend Policy 16 to ensure that the proposal for a Higher Education presence in this area is reviewed if funding for a university is not secured as part of the 2008-2011 public spending review
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Issue 12 – Whether Policy 17 is the most appropriate in all circumstances, to secure the future use of the Mechanics Institute

- 3.60 The Mechanics Institute is a grade II* listed building in the heart of the Railway Village Conservation Area. It has been unoccupied for a number of years; its condition is deteriorating and Urgent Works proceedings have been initiated by the Council. There are strongly held public views that the Mechanics Institute should be brought back into use for community purposes, reflecting its original design and function as a place for sharing and spreading knowledge, and holding social and cultural events and activities, accessible to all.
- 3.61 The CAAP recognises the importance of securing a viable and vibrant long term use for this listed building. As submitted, Policy 17 requires proposals affecting the Institute to be sympathetic to the historic character and role of the building, and to deliver publicly accessible uses of a nature that would not adversely impact on the amenity of Railway Village residents. There are concerns that, as drafted, the policy would not promote community use; the phrase "publicly accessible uses" is seen as too wide-ranging in terms of acceptable potential uses. For example, it could be argued that a hotel use would be publicly accessible, but it would not fulfil local aspirations for community use to be reinstated.
- 3.62 Planning Policy Guidance 15 *Planning and the Historic Environment* (PPG 15) acknowledges that the best use for a listed building will often be the use for which the building was originally designed; reinstating that use should be the first option when the future of a building is considered.

However, not all original uses will now be viable. Policies for development and listed building controls should recognise the need for flexibility where new uses have to be considered to secure a building's survival. The aim should be to identify the optimum viable use that is compatible with the fabric, interior and setting of the historic building.

- 3.63 PPG 15 advises that where a particular compatible use is to be preferred, but restoration for that use is unlikely to be economically viable, grant assistance from the authority, English Heritage or other sources may need to be explored. In some cases, it may be necessary to consider the possibility of securing the future of a listed building by charitable or community ownership, which preserves the building for its own sake for local people and for the visiting public. The government acknowledges the importance of the voluntary sector in this role, since it is well placed to tap local support, resources and loyalty, and buildings preserved in its care can make a contribution to community life, to local education, and to the local economy.
- 3.64 The Mechanics Institute is privately-owned. Although there is strong support to bring the building back into public ownership, the ongoing revenue costs of maintaining the building would impose a substantial financial burden on the Council. Consequently, the acquisition of the building by the local authority was discarded as an option in favour of working with the owner to deliver a sensitive re-use of the building that would secure its long term survival. This approach has informed Policy 17, which is deliberately flexible to avoid hampering the ongoing dialogue between the owner, the Council and English Heritage to seek a creative solution to this longstanding issue.
- 3.65 Whilst public ownership of the Mechanics Institute does not appear to be a viable option, there is no evidence that other sources of funding to help restore the building and reinstate its historic use as a centre for learning, cultural and social activities have been considered, or other ownership options have been explored, notwithstanding the advice in PPG 15. The policy is not framed with such options in mind. Moreover, as drafted, it fails to encapsulate the important place of the building in the heart of the local community, both physically and emotionally. For these reasons, in terms of the future of the Mechanics Institute, I am not persuaded that Policy 17 as submitted is the most appropriate in all circumstances, as required by soundness test vii.
- 3.66 To make this element of the plan sound, I consider it necessary to revise the wording for that part of Policy 17 which deals specifically with the Mechanics Institute. The changes to Policy 17 and the related supporting text set out in **IC12** and **IC13** reflect national guidance on the use of listed buildings, including funding and ownership options, and emphasise the historic function of the building and its importance to the Railway Village community, without being unduly prescriptive. Subject to these changes, I conclude that this element of the plan is sound, having regard to test vii.

IC12	Amend the text supporting Policy 17 to ensure that the availability of grant assistance and alternative ownership options for the restoration of the Mechanics Institute to its historic use as a centre for learning, cultural and social activities are explored, before alternative uses are considered
IC13	Amend Policy 17 to require it to be demonstrated that restoring the Mechanics Institute to its historic use as a centre for learning, cultural and social activities is not feasible before alternative uses for the listed building are considered

3.67 Whilst not fundamental to the soundness of the plan, I agree that the Railway Heritage Area boundary should be amended to include the former Great Western Health Centre and Baths, given the historic synergy between the building and the Railway Heritage Area (**MC9**).

Issue 13 – Whether the housing figures and requirements for affordable housing, housing mix and tenure in the CAAP are founded on a robust and credible evidence base

3.68 Central Swindon is expected to accommodate some 3,593 dwellings (excluding student accommodation) in the period 2006-2026. This figure is based on the 2007 Strategic Housing Land Availability Assessment (SHLAA), which identified the potential for Central Swindon to accommodate 2,457 new dwellings. The base figure has been updated to take into account changes arising from the loss of potential housing at North Star (other than student accommodation); revised estimates that some 1,925 dwellings can be accommodated within the identified development opportunity areas, over and above existing commitments, and the likelihood that a further 500 dwellings are likely to come forward on unidentified sites in the period up to 2026, based on past trends.

3.69 Housing mix and tenure requirements are based on the *2006 Housing Needs Assessment* and the *2006 Swindon Housing Market Assessment*, fine tuned by local experience of managing small units of residential accommodation.

3.70 CAAP Policy18 requires 30% affordable housing on sites where 15 or more dwellings are proposed. This requirement is based on Policy 10 of the Local Plan, which includes low-cost housing in the definition of affordable housing. However, the Council's subsequent guidance on affordable housing set out in *Developer Contributions for Residential Development* (November 2007) defines affordable housing in line with current guidance in Planning Policy Statement 3 (PPS 3) which excludes low-cost housing. The Council's guidance also recognises that viability considerations may justify a reduced level of affordable housing on some sites in certain circumstances. However, it is unclear whether changing the definition of affordable housing to accord with PPS 3 alters the viability assessment underpinning the 30% requirement. The affordable housing requirement will therefore need to be revisited and addressed in the Core Strategy in

the light of the Blythe Valley Court of Appeal Judgement. It may also need to be reviewed should the RSS settle on a higher target figure for affordable housing when it is published in its final version.

- 3.71 However, based on the information submitted, I conclude that the housing figures and requirements for affordable housing, housing mix and tenure set out in the CAAP are founded on a robust and credible evidence base, in accordance with soundness test vii.

Issue 14 – Whether the maps in the CAAP document and the Proposals Map meet regulatory requirements, are consistent, accurate and up-to-date

- 3.72 As noted already, change **IC3** is needed to ensure that the Proposals Map accords with regulatory requirements.
- 3.73 There are several discrepancies between the terms used in the text of the CAAP and those shown on the Proposals map. Change **PEC12** aligns references to development opportunities and commitments sites in the CAAP document with those used for the same sites on the Proposals Map. Change **PEC 13** brings the retail terminology used on the Map in line with terms used in Policy 12 and the supporting text. These changes are needed to ensure consistency (soundness test vi).
- 3.74 Although bus priority measures are shown on the Proposals Map; the schemes themselves are dealt under the Local Transport Plan, rather than the CAAP. Including such routes on the CAAP Proposals Map in these circumstances may serve to confuse rather than inform. Confusion has also arisen because not all bus priority routes are shown accurately on the submitted map. In addition, where areas are subject to a number of overlapping designations, including unnecessary information on the map makes it difficult to read. I am mindful that bus priority routes may change on completion of the Borough-wide transport study, particularly if the canal proposal is implemented. Taking all these considerations into account, I consider that deleting Bus Priority Measures from the Proposals Map (**IC14**) is necessary for clarity.
- 3.75 A number of other changes to the Proposals Map are required in the interest of clarity and consistency. **PC11** ensures that strategic locations for cycle parking proposed as part of the CAAP are shown on the map. **PC10** requires the alignment of the railway crossing footbridge at St Marks Church to be adjusted so that it does not lead directly into Faringdon Park. **PC7** increases the scale of the Map to make it easily legible. **PC8** revises the overlay of colours and shading to distinguish clearly between different areas. **PC6** aligns the demarcation of Sites of Special Scientific Interest as shown in the Legend with that used on the Map. **IC15** addresses discrepancies between the shading of the Clares Factory and Oasis Leisure area as shown in the Legend and as used on the Map. These changes are needed to make the Proposals Map sound, having regard to test vii.

- 3.76 Work to refine the location of the bus station has continued since the CAAP submission. As a result, the large indicative area of search identified on the submitted Proposals Map has now been reduced and refined. Although the revised allocation extends further south along Fleming Way than the original area of search, the affected land is either part of the highway or within the area identified for the Union Square development which will be responsible for delivering the bus exchange and associated facilities. Consequently, I do not consider that the change to the allocation shown on the map in Annex B (**PC9**) would require further sustainability appraisal or consultation. The benefit of a smaller area of search in terms of reducing uncertainty is self-evident.
- 3.77 A number of maps within the CAAP document are based on superseded versions of the Proposals Map, resulting in various inconsistencies between the CAAP document and Proposals Map. To be consistent, **IC16** requires all maps within the body of the CAAP document to be based on the Proposals Map as updated, corrected and revised in accordance with the changes set out above. Other changes to maps within the text needed for consistency are **PC12** which aligns the shading in the map on page 4 with that used for the rest of Central Swindon's Residential Communities, and **PEC14** which aligns the route of the Green Spine shown in the map on page 38 with that shown on the Proposals Map.
- 3.78 Subject to the changes identified, I conclude that the maps in the CAAP document and the Proposals Map would accord with the requirements of the regulations, and meet soundness test vi.

IC14	Delete Bus Priority Measures from Proposals Map and Legend
IC15	Consistent shading on the Clares Factory and Oasis Leisure Centre site between the Proposals Map and Legend
IC16	Maps in the DPD document to be based on a Proposals Map which has been updated, corrected and otherwise revised in accordance with the changes in Annexes A and B
PEC12	Align references to Development Sites and Opportunities in the Document and on the Proposals Map
PEC13	Align the retail terminology used in the Document and on the Proposals Map
PEC14	Align the route of the Green Spine as shown in the Document (page 38) with the Proposals Map
PC6	Consistent demarcation of SSSIs between Proposals Map and Legend
PC7	Increase scale of the Proposals Map
PC8	Revise overlay of colours and shading on Proposals Map
PC9	Incorporate reduced allocation for the proposed Bus

	Exchange on the Proposals Map (see Annex B)
PC10	Amend railway crossing at St Marks Church on the Proposals Map so it does not land in Faringdon Park
PC11	Show strategic locations for cycle parking on Proposals Map
PC12	Substitute cream wash for the pink shading on the Development Strategy Character Areas Map in the Document for consistency

4 Minor Changes

- 4.1 The Council wishes to make a number of minor changes to the submitted DPD in order to clarify, correct and update various parts of the text. Although these changes do not address key aspects of soundness, I endorse them on a general basis in the interests of clarity and accuracy.

5 Overall Conclusions

- 5.1 I conclude that, with the amendments I recommend, the CAAP DPD satisfies the requirements of s20(5) of the 2004 Act and the associated Regulations, is sound in terms of s20(5)(b) of the 2004 Act, and meets the tests of soundness in PPS12.

Linda Wride

INSPECTOR

Annex A

Changes necessary to make the DPD sound

Ref. No.	CAAP policy or paragraph	Report paragraph	Recommended change
PEC1	CH01, Page 3, para 2	3.7	Amend to read: "The Policies of the Action Plan are informed by the Council's core objectives for Central Swindon. These are translated into development principles and enshrined within the Development Strategy. These overarching spatial policies, together with the area based policies, set the parameters within which new development schemes must come forward and provide a detailed policy framework to deliver existing development opportunities as well as Swindon's longer-term aspirations for Central Swindon."
PEC2	CH02, Page 8, paras 1, 2 and 3	3.7	<p>Amend to read:</p> <p>"The Development Principles</p> <p>The successful regeneration of Central Swindon will help Swindon achieve the status of a regional centre that looks, feels and functions in a way that capitalizes on the demand for urban living and that offers a wealth of social and economic opportunities to residents, visitors, businesses and investors alike.</p> <p>This section sets out core and other guiding principles that will shape the delivery of a successful Central Swindon.</p> <p>Central Swindon is the sum of its parts and the future sustainability of the area and its communities is dependent on individual development opportunities being considered in the context of wider regeneration. The policies introduced through the Development Strategy allow us to consider the 'bigger picture', an approach that is fundamental to successful regeneration. An assessment of the individual contribution of new development to a better built environment is no longer sufficient to judge its impact. The ways in which the form and function of the wider area is improved by virtue of a development's collective contribution to public realm and transport and movement is now a key consideration.</p> <p>The Development Strategy seeks to knit together the currently disparate areas of Central Swindon, address the existing structural deficiencies of the area and promote the consistent application of overarching spatial considerations packaged as four core development principles. The Central Swindon Concept Plan identifies barriers to successful regeneration and proposes to overcome them by building on strengths and addressing weaknesses. A perfect example of this is the Action Plan's commitment to improving the synergy between three of Swindon's strongest visitor destinations, the Town Centre, Old Town and the Great Western Designer Outlet Centre. Delivering better linkages between these centres will enable them work in unison to attract visitors and investment to Central Swindon.</p> <p>The four core principles articulated through the Development Strategy relate to design (Policy 1), sustainability (Policy 2), public realm (Policy 3) and transport and movement (Policies 5 to 11). There is a strong commitment to deliver positive change in Central Swindon and these overarching drivers are the building blocks to deliver the step change improvement that the area requires.</p> <p>Central Swindon, and in particular Swindon Town Centre, is characterised by a poor quality built environment. Similarly,</p>

		<p>Central Swindon's public realm is poor and as a consequence the area is difficult to navigate and appears neglected. A lack of green space further detracts from a positive recreational experience of Central Swindon. Movement into and around Central Swindon for all transport modes is difficult, in particular for visitors who are not familiar with its layout. Policy 1, High Quality and Innovative Design, seeks to deliver a step change in design quality throughout Central Swindon focussing in particular on the Town Centre. Policy 3, Public Realm, acknowledges the need for investment in the Public Realm and is in place to deliver a legible and integrated network of streets, squares, parks and other spaces in and between key development opportunities that will positively transform the image of Swindon for residents, visitors, businesses and investors alike. In responding to weaknesses in the road network, the transport strategy seeks to improve access into and around the centre for the full range of transport modes (Policies 5 to 11), with improvements being focussed in particular on enhanced linkages across the railway (Policy 10) and reducing circulating and through traffic which will make a dramatic difference to congestion at peak times.</p> <p>While all of the larger regeneration schemes will be mixed-use, they will remain 'use' led to reinforce area identities and promote day-long activity. The renaissance of Central Swindon will be built upon existing major development commitments and other identified development opportunities (allocations D1-D10 on the Proposals Map), which offer opportunities for complementary and well connected new development.</p> <p>The Promenade (Policy 13 and Development Opportunity D8) is identified as the Cultural Quarter for Central Swindon which will build upon its anchor presence, the Wyvern Theatre. The area is immediately adjacent to the Retail Core, the centre for shopping and living (Policy 12 and Development Opportunities D2, D3, D4 and D5). Pedestrian footfall is highest here and focussed improvements to the environment through good design and high quality public realm will make a dramatic difference to connectivity and integration and help develop both their individual and complementary roles. The Commercial Quarter (Policy 14 and Development Opportunity D6) is office led and will reinforce Swindon's strong economic profile. It is purposely located on a strong axis from the railway station, a key gateway to Central Swindon, and the Retail Core to encourage movement between the two along a primary route. In delivering the successful and inclusive regeneration of Central Swindon the residential communities adjoining the Town Centre (Policy 18) should also enjoy tangible benefits of design quality and public realm improvements.</p> <p>The most notable green infrastructure related public realm initiative is the Green Spine (Policy 3) and it plays a major role in linking new and existing development in Central Swindon. All major regeneration proposals will be accessible directly off the main Green Spine or its green 'arms' (see page 38). The Green Spine will not only deliver much-needed greenery to the centre but will provide a primary north-south route which will link Old Town and the Town Centre with North Star and beyond. This is vital in helping overcome the barrier created by the railway and will make the educational and leisure uses, both existing and proposed, at North Star (Policy 16) and the Railway Corridor (Policy 15 and Development Opportunity D7) more accessible, enabling the vibrant uses proposed to be sustained as an extension of the Town Centre.</p> <p>Direct, legible and pleasant routes for pedestrians, cyclists, and at appropriate points vehicular traffic, will create a legible movement framework that can help repair the structural fabric of Central Swindon and make it a cohesive whole. The canal (Policy 4) will offer up similar benefits as a route dedicated to alternative modes of transport. It will also provide an attraction that will naturally encourage movement between the Great Western Designer Outlet Centre to the Town Centre and vice versa and stimulate investment. The canal will also help raise the profile of the wider Railway Heritage Area</p>
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			(Policy 17), a largely untapped gem at the heart of Swindon.”
PEC3	CH03, Page 15, Para 5	3.10	Amend to read: “New development in Central Swindon will be guided by urban design principles aimed at improving the quality of new buildings and their surroundings, not only in terms of how they look, but also how they function. ‘New development’ covers proposals at all scales ranging from small public spaces and individual or grouped buildings to large-scale comprehensive development schemes.”
PEC4	CH03, Page 15, Para 6	3.10	<p>Amend to read: “New development in Central Swindon must satisfactorily respect and address the following urban design principles.</p> <p>Order and unity is the arrangement of separate elements of a group in a logical and comprehensible way.</p> <p>Expression is the communication of quality and meaning. It is important for the architecture of new proposals to express the use of the building. Public buildings should be expressed in a way that respects and gives a sense of civic pride to the public realm and public facilities, similarly office buildings can symbolise a sense of financial and economic strength through their architectural expression.</p> <p>Integrity - a building with integrity is honest to its time and to the design principles that embody the kind of architecture one is striving to achieve.</p> <p>Detail - concerned with the detailed design of both buildings and the public realm and the interface between these two.</p> <p>Context - relates to the way a new proposal interfaces with its surroundings. This may comprise the following principles:</p> <p>Siting – the relationship a building has to the urban grain of the town as well as the relationship the building has to other buildings and to the street.</p> <p>Massing – the three dimensional envelope of the building. This defines the building’s height, bulk and silhouette. A good building respects its neighbours in terms of these criteria.</p> <p>Scale – can be assessed in terms of human and built scale. Every building has a relationship in terms of scale to that of a human being and also to its surrounding built form. A building can therefore be of human or inhuman scale and can be in or out of scale with another building. This is exactly measurable and not a matter of opinion.</p> <p>Proportion – is the relationship between different parts of a building. It is also the agreeable or harmonious relationship between parts of a building within a whole and to surrounding buildings.</p> <p>Rhythm – is the arrangement of the components of the façade and is the repetitive use of a group of visual elements along an elevation. This can consist of patterns of openings, projected bays and other architectural elements. Successful pedestrian streets are made up of vertically aligned rhythms across a façade. A logical form of rhythm across a façade adds to a sense of order to the streetscape. The same can be said for having respect for a common building line i.e. how buildings meet the street.</p>

			<p>Materials – Swindon Borough Council will be expecting to see a natural palette of materials, to a high quality that weather attractively over long periods of time.”</p>
PEC5	CH3, Page 16, Para 1	3.10	<p>Amend to read: “Reinforcing or Creating a Sense of Place in Central Swindon’s Character Areas</p> <p>Design principles should always be applied with local context in mind. High standards of architectural design and detailing are necessary to create new areas of townscape character and interest but equally to enable a new development to complement neighbouring buildings and assimilate into the environment in which it is located.</p> <p>The Borough Council expects that the highest standards of design and detailing to be employed in all new developments. The key to successful design is in the detailing. It is essential to think carefully about the way chosen materials work with each other, how the various elements of a building relate and how they line up. This is as vital to the architectural articulation of a building façade as it is to the detailing of a square, a street or an avenue of trees. High standards of architectural design and detailing are necessary to create new areas of townscape character and interest but equally to enable a new development to complement neighbouring buildings and assimilate into the environment in which it is located.</p> <p>Further to their contribution to good design generally, these details can also help reinforce the distinctive features in each character area. By taking these cues from existing buildings in an area of Central Swindon it is possible to create an addition to the built environment that complements but does not slavishly copy the existing character. By respecting cues like scale and massing but using an innovative approach to materials and detailing it is possible to reinforce the identity of an area and contribute to its special character. Cues should be taken from positive features of a place. There is no reason why character and innovation should not go together. New and old buildings can coexist happily without disguising one as the other, if the design of the new is a response to urban design objectives.</p> <p>The character areas identified in Part II of the Action Plan and subject to specific area based policies each have distinctive features, which should inform the design of new development within these areas.”</p>
PEC6	CH3, Page 16, Paras 2-5	3.10	<p>Amend to read: “Town Centre (Policies 12-15)</p> <p>EXISTING CHARACTER</p> <p>The civic and commercial heart of the town is itself characterised by distinct areas, which generally exhibit single land uses. Concentrations of these single uses in particular areas detract from the Town Centre’s general liveliness to the detriment of a sustainable mixed use community. In addition to reduced functionality, the Town Centre’s form has been marred by the legacy of late 20th Century development where many high quality older buildings were demolished and local street patterns were shattered to make way for more modernist architecture. This seriously detracts from local character.</p>

			<p>GENERAL DESIGN ASPIRATIONS FOR THE TOWN CENTRE</p> <p>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. Refurbishment of existing buildings should address the need for active frontages at ground floor level. Having frequent doors and windows animate the public realm and reduce crime and fear of crime (Policy 12). Introducing commercial or residential uses on the upper floors can enliven an area further (Policies 12-15). Care must be taken to ensure uses are compatible.</p> <p>A high housing density is appropriate in the Town Centre but this should not mean that flats are the only choice of home within the area. A mix of housing tenure and type, including family housing, is vital in ensuring the future sustainability of the Town Centre (See Policy 18).</p> <p>The Town Centre and gateways that mark a person's arrival to the Town Centre are perfect locations for landmark buildings. Landmarks help people move around a place. Whilst every building cannot be a landmark, distinctive features should be considered at key corners and within nodes of activity. Landmarks can be distinctive by virtue of height (particularly raised heights on corners), use, status, colour and location. High standards of design are especially important in prominent landmark buildings given their profile (Policy 1).</p> <p>Care must be taken to ensure that the Town Centre's few remaining high quality older buildings are protected and enhanced to add character and variety."</p>
PEC7	CH03, Page 16, Paras 6-8	3.10	<p>Amend to read:</p> <p>"Old Town and Victoria Road (Policy 19)</p> <p>EXISTING CHARACTER</p> <p>Old Town is regarded more favourably than the Town Centre in urban design terms due to its collection of high quality older buildings. Its historic character merits conservation and enhancement. The predominant building height is two to three storeys in Wood Street and the High Street, and the area exhibits traditional shop front design.</p> <p>In the residential streets a common building line is set back from the pavement with defensible private space to the front of residences. Property widths are fairly narrow and common materials include brick, brick with stone dressings, stone painted brick or render. Commercial premises generally front directly onto the street.</p> <p>GENERAL DESIGN ASPIRATIONS FOR OLD TOWN</p> <p>New development should respect the special local character of Old Town. Shop front design and signage should be in compliance with the Council's Shop Front Coding Guidance to maintain a unified street frontage on Victoria Road, Bath Road, Newport Street and Wood Street (Policy 19). Public realm should be improved in line with the Public Realm</p>

			Strategy (Policy 3) to create the high quality environment for shoppers and pedestrians necessary to achieve its projected status as a niche shopping destination well connected to the existing Town Centre. Proposals on Victoria Road should ensure that any changes to properties respect their historic character and respond positively to the Green Spine (Policy 3 and 19). Proposals incorporating contrasting contemporary design must be of an exceptionally high quality (Policy 1)."
PEC8	CH03, Page 16, Paras 9-10	3.10	<p>Amend to read:</p> <p>"Existing Residential Communities (Policy 18)</p> <p>EXISTING CHARACTER</p> <p>The existing residential communities in Central Swindon are largely characterised by Victorian terraced housing set out on grid patterns, which demonstrate a fine urban grain. New development proposals must not alter the character of the streets and should respect the form and function of the communities within which they are located.</p> <p>GENERAL DESIGN ASPIRATIONS FOR EXISTING RESIDENTIAL COMMUNITIES</p> <p>All new development proposals which impact directly on these residential communities should demonstrate how they contribute positively to the area. Proposals that are out of scale with existing development or result in significant intensification of a site can have negative impacts on communities by creating overbearing buildings, casting of shadows, increased traffic congestion and parking problems. Improved physical and functional links to and from new and existing communities are vital to aid integration."</p>
PEC9	CH03, Page 17, Para 1	3.10	<p>Amend to read:</p> <p>"North Star (Policy 16)</p> <p>EXISTING CHARACTER</p> <p>North Star is isolated from the Town Centre and the railway acts as a barrier to its accessibility. Perhaps the least defined of the Central Swindon character areas, North Star exhibits mainly low-density uses with a good proportion of available land given over to surface car parking. It mixes predominantly leisure and industrial uses with a further education facility and office employment uses to the south.</p> <p>The plots are large, with large 'pavilion-style' structures, mostly set within soft landscaping, or car parks. Activity is limited mainly to internal areas depriving the street scene of life and interest.</p> <p>GENERAL DESIGN ASPIRATIONS FOR NORTH STAR</p> <p>There is significant scope to increase the density of development in these areas and height is not a significant issue given the island nature of the site and its neighbouring land uses. Development will need to help enhance movement across the railway and should also enhance movement between North Star and the wider urban area, especially the residential areas and open space to the north of Great Western Way.</p>

			New development should incorporate active frontages to the street and newly created open spaces thus increasing the activity and variety of the street scene. There is great potential to improve physical and visual permeability at North Star. The area is highly visible from the railway, a significant gateway to Swindon. The design of new development should respond to its high profile location especially given the quality of the existing westerly approach to Swindon Station through the Railway Works area."
PEC10	CH03, Page 17, Para 2	3.10	<p>Amend to read:</p> <p>"The Railway Heritage Area</p> <p>EXISTING CHARACTER</p> <p>The Local Planning Authority has a duty to preserve or enhance the character or appearance of Conservation Areas, Listed Buildings and their settings. There are two such areas in the Railway Heritage Area, the Railway Village and Railway Works Area. Swindon's Railway Works is Britain's main railway engineering showpiece, and has been the subject of a World Heritage Site bid. Many of the engineering sheds have been sensitively converted, not least into the Swindon Designer Outlet Centre. The high density terraced railway cottages are largely in Council ownership and have been restored and maintained in a sensitive way so as to respect its historical tradition.</p> <p>GENERAL DESIGN ASPIRATIONS FOR THE RAILWAY HERITAGE AREA</p> <p>Development proposals within, or that will impact on the setting of, the Railway Heritage Area should not harm the character or appearance of the area. With the rate of change expected over the next twenty years and the high profile of regeneration in Central Swindon, preserving and enhancing our rich historic environment will deliver an area that complements the regenerated Town Centre. New development should take positive cues from the existing built fabric."</p>
PEC11	CH03, Page 19, Policy 1	3.10	<p>Amend to read:</p> <p>"Policy 1</p> <p>High Quality and Innovative Design</p> <p>High quality design will be required of all new development in Central Swindon. Applications will be expected to demonstrate that the design of the development proposal satisfies each of the criteria set out below.</p> <p>The design should:</p> <ul style="list-style-type: none"> • incorporate active frontages* especially where the development forms part of the Town Centre; • ensure entrances are emphasised and designed to complement the public realm onto which they front; • consider a mix of uses and where residential forms part of the mix, ensure a mix of housing tenure and type is achieved; • respect and satisfactorily address order and unity, expression, integrity, siting, massing, scale, proportion, rhythm, materials and landscaping • include any necessary provision for the screening of service plants • where the existing design is good and much appreciated, respect the context of the site and the character of the part

			<p>of Central Swindon within which it is located</p> <ul style="list-style-type: none"> • embody the principles of inclusive design and access for all; • preserve or enhance the character, appearance and setting of Conservation Areas or Listed Buildings; • deliver the sustainable construction requirements set out in Policy 2; and • incorporate Secured by Design principles on all major new developments**. <p>*An active frontage refers to a frontage that can engage the general public, for example, a shop's public display area.</p> <p>**Major developments are developments of 1,000 sq. m. (gross) and over and developments involving 10 or more dwellings"</p>
PEC12	Proposals Map	3.73	Amend site references in the Plan text to align with site references on the Proposals Map: 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 - "Regent Place (Area D2 on the Proposals Map)". The 1st Heading at Page 71 should read - "Sanford Street Area (Area D3 on the Proposals Map)". The 1st Heading at Page 72 should read - "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)".
PEC13	Proposals Map	3.73	Amend terminology used in the Proposals Map key from "Town Centre Primary Frontage", "Town Centre Primary Frontage (Indicative)", "Town Centre Secondary Frontage", and "Town Centre Secondary Frontage (Indicative)" to read "Retail Core Primary Frontage", "Retail Core Primary Frontage (Indicative)", "Retail Core Secondary Frontage", and "Retail Core Secondary Frontage (Indicative)" respectively.
PEC14	Chapter 5, Page 38, Map	3.77	Amend the Green Spine route in the "Green Links to Open Spaces in Central Swindon" map to accord with the Proposals Map Area Green Spine route.
PC1	CH3, Policy 1, Page 19	3.10	Amend penultimate bullet point of the first part of Policy 1 to read: "deliver the sustainable construction requirements set out in Policy 2, including the provision of space for the storage of waste; and"
PC2	Implementation Plan, Section 6, Page 39	3.32	<p>Insert following monitoring indicators and targets:</p> <ul style="list-style-type: none"> ➤ <u>"% of major development incorporating passive solar design principles where feasible – target = all major development proposals"</u> ➤ <u>"% residential development reaching the Lifetime Home standard – target = 50% of major residential development proposals"</u> ➤ <u>"The extent of green roof coverage within the Central Area Action Plan Area - target = >5,000sqm by 2016"</u>
PC3	CH7, Policy 12, Page 74	3.51	Insert an additional bullet point to read: "The Master Plan for the Sanford Street area should set out how development schemes in this area can come forward as individual development parcels."
PC4	CH7, Policy 12, Page 74	3.52	Amend the final bullet point to read: "The Master Plan for the redevelopment of the Upper Bridge Street / Fleet Street Area should demonstrate how the canal and canal basin can be successfully accommodated within the development and how the development can become fully integrated with Union Square. The Master Plan should enable development schemes to come forward in advance of the canal and canal basin, provided they accord with the principles of the Master Plan and do not prejudice the delivery of the canal or canal basin."
PC5	CH7, Policy 13,	3.55	Insert "Class A2 (Financial & Professional Services)" within the fourth paragraph of Policy 13.

	Page 79		
PC6	Proposals Map	3.75	Amend to match the thickness of the purple lines demarcating Sites of Special Scientific Interest on the legend with those shown on the map.
PC7	Proposals Map	3.75	Amend to increase the scale of the map.
PC8	Proposals Map	3.75	Amend to revise the over-lay of colours and shading on the Proposals Map to provide greater clarity.
PC9	Proposals Map	3.76	Amend Proposals Map to show a reduced alignment for the bus exchange (see Annex B)
PC10	Proposals Map	3.75	Amend Proposals Map to show railway crossing footbridge at St Marks Church not leading directly into the Park.
PC11	Proposals Map	3.75	Amend Proposals Map to show strategic locations for bike parking on the Proposals Map.
PC12	CH01, Page 4, Map	3.77	Amend the "Development Strategy: Character Areas" Map to remove the pink shading and wash the area in cream to match that used for the rest of the "Central Swindon Residential Communities" area.
IC1	Title Page	1.3	Replace the words "Submission Paper" with "Development Plan Document" and add the date of adoption
IC2	Contents Section 12 Opportunities to comment	1.3	Delete and replace with 12. Other parts of the Development Plan Document (bound separately) Part III: The Implementation Plan Appendix 1: Policies in the Swindon Borough Local Plan to be superseded by this Development Plan Document and schedule of consequential changes to the Adopted Proposals Map Appendix 2: Glossary of Terms
IC3	Proposals Map	1.3	Insert National Grid lines and reference numbers
IC4	Policy 4 Para 6	3.24	Delete paragraph 6 and replace with Progress on the canal proposal will be monitored by the Council's Canal Task Force. The Canal allocation will be reviewed within the first two years of the Action Plan's adoption if any of the following occur (a) insurmountable constraints are identified as the detailed design develops (b) failure to secure a funding strategy sufficient to cover the full costs of the proposal (c) public support is not secured as part of the ongoing consultation on detailed design work.
IC5	Implementation Plan Section 6	3.24	Objective 9 Section 5 – Public realm Para 1, second sentence add "including the reinstatement of a canal through Central Swindon" Insert under Targets Adoption of Bridge Street/Upper Bridge Street Master Plan by <i>(insert date 12 months from CAAP adoption date)</i> Canal Funding and Transport Strategy in place by <i>(insert date 12 months from CAAP adoption date)</i> Detailed design scheme for canal and canal basin in place by <i>(insert date 24 months from CAAP adoption date)</i>
IC6	Section 6 Guiding Principles for Transport in Central Swindon page 54	3.34	Delete section and replace with: Transport and Movement Strategy for Central Swindon The guiding principles for transport in Central Swindon are to facilitate ease of movement into, out of and around Central Swindon and to support its economic growth and regeneration. The Council seeks to increase the choice of travel options so that the car does not dominate or have a detrimental impact on the environment, or the quality of the experience in the Town Centre.

			<p>The Action Plan seeks to improve the capacity and performance of the existing road network by discouraging through traffic and reducing the amount of circulating traffic. To deliver on this goal, development proposals will be considered by the Council not only in terms of the impact on the transport network in the immediate area of their site but also the cumulative impact of proposals in the area. Traffic management will ensure road systems operate efficiently to allow the road network to cope with traffic movement.</p> <p>Promoting the use of public transport together with enhancing provision for pedestrians and cyclists will be key to reducing the dominance of the car. A well-located bus exchange will provide a new gateway for the regenerated Town Centre and this together with well-placed interchanges will encourage sustainable travel choices. Improving accessibility to the railway station will make the most of its gateway status.</p> <p>Creating a balance between restraint and adequate parking provision within Central Swindon will be important in the context of the role of parking in enhancing accessibility and supporting the economic development of Central Swindon.</p> <p>In addition to the limited Local Transport Plan funding, the bulk of funding for transport infrastructure will be from developer contributions, and through the direct provision of transport infrastructure within developments.</p> <p>Policy 5 The Transport and Movement Strategy</p> <p>Development proposals and highway schemes will be assessed in terms of how they fit into the aims and objectives of the Vision for Transport, the Strategy for Transport in the Town Centre, the Local Transport Plan and the overarching transport and movement strategy. Regard will be had to the individual and cumulative impact of such proposals on highway capacity and performance, traffic management, car parking, public transport and provision for cyclists and pedestrians, as well as environmental quality in the Town Centre.</p>
IC7	Section 6, The Wider Town Centre Road Network Paragraph 4	3.35	<p>Delete sentence 2 and replace with:</p> <p>To achieve this commitment, applications meeting the threshold in the Guidance for Transport Assessment (GTA) must be supported either by a Transport Statement or Assessment underpinned and informed by evidence gathered at an early stage in the process of developing proposals. Applications should be supported by a Transport Plan setting out measures to promote sustainable travel, together with any transport mitigation measures necessary to reduce the negative impacts on the environment associated with increased traffic.</p>
IC8	Section 6, The Wider Town Centre Road Network	3.35	<p>Insert new Policy 6 at the end of the section "The Wider Town Centre Network"</p> <p>Policy 6 Development and the Highway and Transport Network</p> <p>To assess the effect on development proposals on the highway and transport network in the immediate vicinity of the site, all developments that meet the thresholds set out in the Guidance for Transport Assessment (GTA) should produce either a Transport Statement (TS) a Transport Assessment (TA) and Travel Plan (TP) as appropriate. This should include a commitment to reduce adverse environmental impacts arising from increased traffic associated with the development "</p>
IC9	Section 6 Transport Infrastructure and Developer	3.36	<p>Move to follow on from new Policy 6.</p> <p>Re-number Policy 11 as Policy 7</p> <p>Re-number all subsequent Policies sequentially</p>

	Contributions		
IC10	Page 59 Number of Spaces Required Paras 1 and 2	3.46	Insert at end of para 1 "A further 1,000 spaces are currently provided at Park and Ride sites on routes serving the town centre" Amend the last two sentences of para 2 as follows "Public parking provision will need to be increased in the period up to 2026 to accommodate the level of growth identified for Swindon. Additional spaces will be provided at Park and Ride sites on key radial routes serving the Town Centre, and a new 1,000 space car park will be incorporated within the Central Swindon development scheme."
IC11	Section 8 North Star Policy 16	3.59	Policy 16 The Clares Factory and the Oasis Leisure Centre sites Delete para 2 and substitute If government funding for a university is not secured in the 2008-2011 public spending review, the allocation of land for a Higher Education presence in this area of North Star will be reviewed
IC12	Section 9 The Railway Heritage Area Page 98	3.66	Insert at the end of Para 1: Before alternative uses are considered, the availability of grant assistance and the option of charitable or community ownership should be explored in order to establish whether it is feasible to reinstate the historic use of this listed building as a centre for learning, cultural and social activities.
IC13	Section 9 The Railway Heritage Area Policy 17 Page 99	3.66	Policy 17 The Swindon Railway Village Conservation Area Amend para 3 as follows: If it is demonstrated that reinstating the historic use of the Mechanics Institute as a centre for learning, cultural and social activities is not feasible, then other options for the future use of this listed building will be considered. Such uses should be sympathetic to, and compatible with, the historic character and role of the building, deliver public access to, and use of, the building's main rooms as far as possible, and be of a nature that would not adversely impact on the amenity of Railway Village residents.
IC14	Proposals Map	3.74	Delete Bus Priority Measures from the Map and Legend
IC15	Proposals Map	3.75	Amend so that shading on the Clare's Factory and Oasis Leisure Centre site are the same on both the Map and the Legend
IC16	Maps within the CAAP document	3.77	All maps within the body of the CAAP should be based on a Proposals Map which has been updated, corrected and otherwise revised in accordance with changes listed in this Annex

Annex B (following page)

Recommended change to Proposals Map– see PC9 of Annex A to this Report

Annex C

Schedule of minor changes not affecting the soundness of the DPD

MC1	CH03, Page 17, Para 6	4.1	Amend "Centre for Architecture and the Built Environment" to read "Commission for Architecture and the Built Environment".
MC2	CH03, Page 21, Para 2	4.1	Amend "Centre for Architecture and the Built Environment" to read "Commission for Architecture and the Built Environment".
MC3	CH03, Page 17, Para 5	4.1	Amend to read: "Police Architectural Liaison Officers should be consulted at the earliest opportunity and all new major developments should aim to achieve Secured By Design status."
MC4	CH04, Page 28, Policy 2, Quality Assurance	4.1	Insert new paragraph: "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."
MC5	CH05, Page 34, 2 nd sentence of Pt 6	4.1	Amend to read: "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.
MC6	Implementation Plan, Section 11, Page 37	4.1	Amend to read "...promoting uses which encourage pedestrian and cyclist movement between the two centres".
MC7	Annex 1	4.1	Insert following definitions in 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".
MC8	CH11, Page 115, Para 3	4.1	Amend to read: "At the southern end of road where it meets Bath Road, an opportunity exists to deliver a public realm feature alongside wider public realm improvements in the Wood Street area."
MC9	Proposals Map	3.63	Change the boundary of the Railway Heritage Area to include the former Great Western Health Centre and Baths