

# **Sustainability Appraisal (SA) of the emerging Swindon Borough Local Plan 2043**

**Interim SA Report**

**June 2025**

Quality information

Prepared by	Checked by	Approved by
Mark Fessey Associate Director	Ian McCluskey Associate Director	Nick Chisholm-Batten Technical Director

Prepared for:

Swindon Borough Council

Prepared by:

AECOM Limited  
Aldgate Tower  
2 Leman Street  
London E1 8FA  
United Kingdom  
aecom.com

© 2025 AECOM Limited. All Rights Reserved.

This document has been prepared by AECOM Limited (“AECOM”) in accordance with its contract with Swindon Borough Council (the “Client”) and in accordance with generally accepted consultancy principles and the established budget. Any information provided by third parties and referred to herein has not been checked or verified by AECOM, unless otherwise expressly stated in the document. AECOM shall have no liability to any third party that makes use of or relies upon this document.

Table of Contents

Non-technical summary ..... i

1. Introduction ..... 1

2. The plan scope.....2

3. The SA scope..... 9

Part 1: Work to date ..... 10

4. Introduction to Part 1 ..... 11

5. Defining growth scenarios ..... 12

6. Growth scenarios appraisal ..... 38

7. The preferred growth scenario ..... 50

Part 2: SA findings at this stage? ..... 51

8. Introduction to Part 2 ..... 52

Part 3: Next steps ..... 54

9. Plan finalisation ..... 55

10. Monitoring ..... 55

Appendix I: Regulatory requirements ..... 56

Appendix II: The SA scope ..... 59

# Non-technical summary

The aim of this report is to appraise the current Draft Swindon Local Plan alongside “reasonable alternatives”. The report is structured in order to explain a story over time, specifically:

- Part 1 – deals with reasonable alternatives (RAs), specifically:
  - Section 4 – introduces the concept of RAs.
  - Section 5 – presents the outcomes of a process to define RAs.
  - Section 6 – appraises RAs.
  - Section 7 – presents officers’ response to the appraisal.
- Part 2 – presents an appraisal of the current Draft Local Plan.
- Part 3 – discusses next steps.

Focusing on Section 6, this presents an appraisal of RAs in the form of ‘growth scenarios’, defined as alternative approaches to development with a view to providing for development needs alongside supporting the achievement of wider plan objectives. The appraisal involves exploring the merits of the growth scenarios under the ‘SA framework’, which is discussed in Section 3 and essentially comprises a list of sustainability objectives.

Within Section 7 officers response to the appraisal is as follows:

Scenario 1 is taken forward as the basis for the Draft Local Plan that is currently the focus of consultation. The appraisal shows it to perform suitably well, such that officers believe it to be: *“Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence”* (NPPF para 36).

It is acknowledged that there is a ‘homes’ argument for supporting a higher growth scenario, and it is also acknowledged that the higher growth scenarios appraised are associated with limited issues/impacts in some regards. However, there are also certain significant concerns with both of the higher growth scenarios, particularly in terms of landscape, transport and water objectives. The appraisal flags more limited concern with a higher growth strategy involving additional growth directed to Highworth, but it is important to be clear that the appraisal is undertaken without any assumptions made regarding what site or sites would be allocated.

At the current time the impacts and risks / uncertainties associated with higher growth are considered to comfortably outweigh the benefits. However, it is recognised that there will be a need to reconsider this position in light of consultation responses received, including consultation responses received from neighbouring local authorities and other partner and stakeholder organisations with a strategic remit (and all such organisations are encouraged to comment on the growth scenarios appraisal).

With regards to the draft plan appraisal presented in Part 2, this is an opportunity to revisit the appraisal of Growth Scenario 1 from Section 6 and also factor-in the development management (DM) policies that also form part of the current consultation document. It presents some key recommendations around carefully accounting for development viability as part of plan finalisation, specifically as part of work on both spatial strategy / site selection and DM policy.

Part 3 is then presents a short discussion of next steps, and also briefly looks ahead to monitoring plan implantation. The key point to note is that subsequent to the current consultation further work will be undertaken to explore issues and options and further formal consideration will be given to reasonable alternatives. Subsequently the final draft (‘proposed submission’) version of the Local Plan will be prepared for publication under Regulation 19 of the Local Planning Regulations (this current consultation is held under Regulation 18). The next step (assuming the plan is still deemed to be ‘sound’ in light of representations received) will then be to submit the Local Plan to the Government who will ask the Planning Inspectorate to examine the Local Plan.

# 1. Introduction

## 1.1. Background

- 1.1.1. AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Swindon Borough Local Plan (henceforth 'Swindon Local Plan' or 'the Local Plan') that is being prepared by Swindon Borough Council (SBC).
- 1.1.2. Once adopted, the plan will set a strategy for growth and change up to 2043, allocate sites to deliver the strategy and establish policies against which planning applications will be determined.
- 1.1.3. SA is a mechanism for considering and communicating the effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives. SA is required for local plans.<sup>1</sup>

## 1.2. SA explained

- 1.2.1. It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes (SEA) Regulations 2004.
- 1.2.2. In-line with the Regulations, a report (known as the **SA Report**) must be published for consultation alongside the draft plan that presents an appraisal of "the plan and reasonable alternatives" with a particular focus on appraising "significant effects".
- 1.2.3. More specifically, the SA Report must:
  - explain **work to date** and, in particular, appraisal of 'reasonable alternatives';
  - present **an appraisal of current proposals**, i.e. the Draft Plan; and
  - explain **next steps**.
- 1.2.4. The report must then be taken into account, alongside consultation responses, when finalising the plan.

## 1.3. This Interim SA Report

- 1.3.1. The current consultation is on an early draft plan under Regulation 18 of the Local Planning Regulations, with the intention to subsequently consult on the final draft ('proposed submission') version under Regulation 19.
- 1.3.2. As such, this is not the formal SA Report but an 'Interim' SA (ISA) Report.
- 1.3.3. A final point to note is that this report integrates **Equality Impact Assessment (EqIA)**, as discussed further in Section 3.

### Structure of this report

- 1.3.4. This ISA Report aims to present all of the information required of the SA Report and so is structured in **three parts** covering "work to date", "an appraisal of the current proposals" and "next steps".
- 1.3.5. Ahead of Part 1, there is a need for two further introductory sections:
  - Section 2 – introduces the plan scope.
  - Section 3 – introduces the SA scope.

<sup>1</sup> Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (NPPF, 2024). The Town and Country Planning (Local Planning) Regulations 2012 require that an SA Report is published for consultation alongside the 'Proposed Submission' plan document.

## 2. The plan scope

### 2.1. Introduction

- 2.1.1. The aim here is to briefly introduce the context to plan preparation, including the national context of planning reform; the plan area (ahead of more detailed discussion below); the plan period; and the objectives that are in place to guide plan preparation.

### 2.2. Context to plan preparation

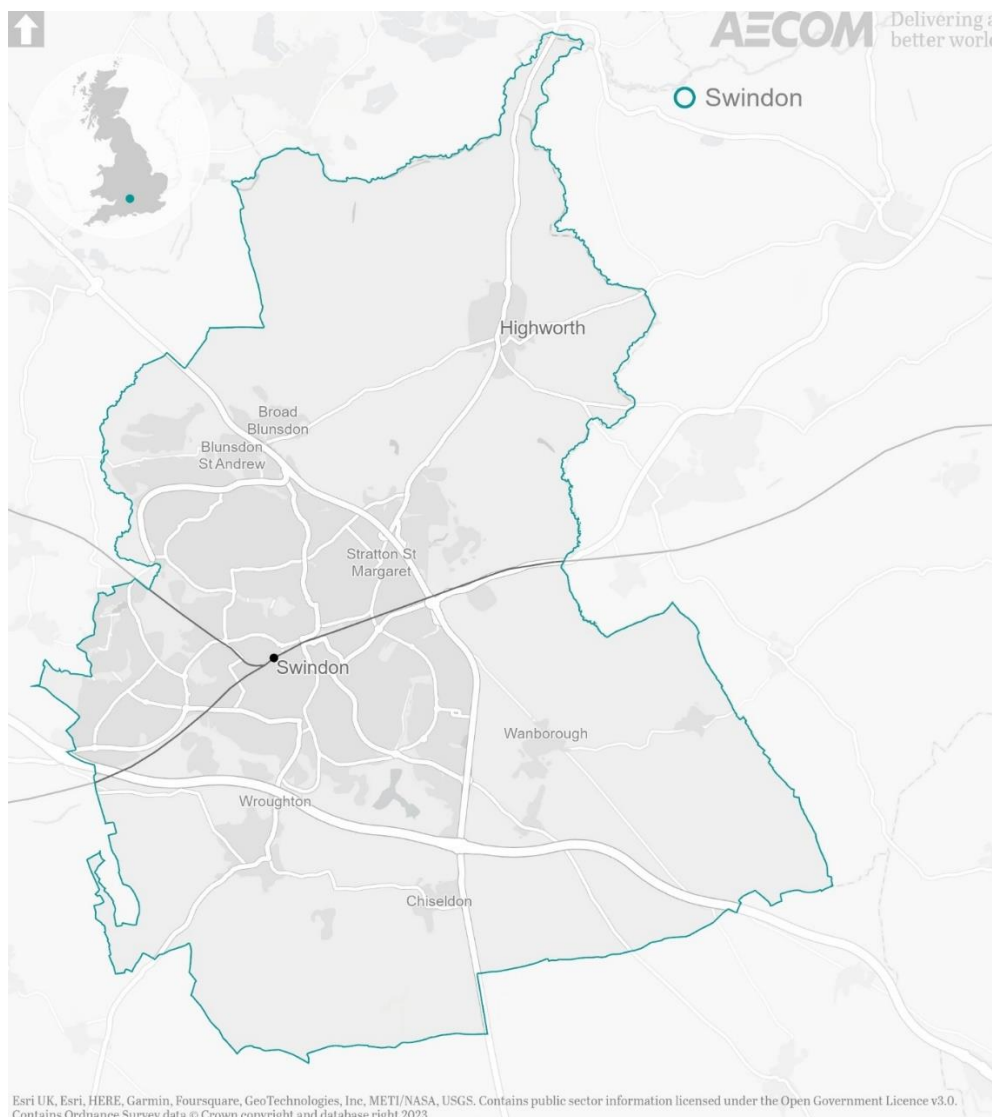
- 2.2.1. Plan-making has been underway for a number of years, and with considerable urgency because the adopted Local Plan dates from 2016 and looks ahead only to 2026, whilst the NPPF expects plans to be reviewed every five years and look ahead 15 years, including in terms of identifying a supply of land sufficient to meet development needs.
- 2.2.2. There is also considerable urgency to adopt a new Local Plan with a view to ensuring that the Council is able to demonstrate and maintain a five year housing land supply (5YHLS), i.e. a rolling supply of demonstrably 'deliverable' sites with a total capacity sufficient to provide for the annual housing requirement (discussed below) over a total of five years. An inability to demonstrate a 5YHLS means that planning applications must be determined under the 'presumption in favour of sustainable development' (NPPF paragraph 11) and this has been a major issue in Swindon over recent years. Specifically, the issue is that 'the presumption' means a 'tilted balance' in favour of granting planning permission, such that where the Council refuses an application there is a heightened risk of the application being permitted at appeal ('planning by appeal').<sup>2</sup>
- 2.2.3. There is a need for a major supply boost in order to reach a situation whereby the Council is able to demonstrate and maintain a 5YHLS and, clearly, the best way to achieve this is in a coordinated way via a new Local Plan, as opposed to approving ad hoc applications for new development in the absence of an overarching plan. A further consideration is that lessons must be learned from the shortcomings of the adopted Local Plan in terms of its identified supply performing poorly against the objective of maintaining a 5YHLS / avoiding 'the presumption'. Furthermore, this is all in the context of the NPPF being clear that: *"The planning system should be genuinely plan-led."*
- 2.2.4. To summarise the discussion so far, there is: A) 'top down' pressure to adopt a Local Plan given the expectations of the Government, as set out in the NPPF; and B) 'bottom up' pressure in the sense of a need to ensure that growth comes forward in a plan-led way, i.e. such that the Borough can avoid potentially problematic 'planning by appeal'.
- 2.2.5. Finally, and on a more positive note, there is a need to adopt a Local Plan that delivers on wide-ranging objectives regardless of the 'pressures' discussed above, for example:
- Providing for housing need is not only of great importance in-and-of itself, but also due to wide-ranging secondary benefits, e.g. affordable housing and the economy.
  - Plan-led housing growth creates an opportunity to target infrastructure investment to realise benefits far in excess of what would otherwise be the case.
  - Equally, coordinated growth can deliver on regeneration objectives and, in practice, coordinated growth to deliver town centre regeneration is a key aim of the Local Plan.
  - A local plan is an opportunity to consider development viability in a strategic way, such that a considered approach can be taken to policy 'asks' including housing mix, affordable housing, net zero development, biodiversity net gain and more.
  - The Local Plan is a key opportunity to ensure a strategic approach in respect of a range of other key issues, including providing for employment land needs.

<sup>2</sup> There is also a need to annually pass the Government's Housing Delivery Test (HDT), which is a test of whether the housing requirement has been delivered over the three most recent years. Essentially there is a need for a robust supply, as measured against the requirement, sufficient to pass both the HDT, which looks back, and the 5YHLS test, which looks forward.

## 2.3. The plan area

- 2.3.1. Swindon Borough is a unitary authority located at the northeast extent of the ceremonial county of Wiltshire, with the remainder of the county comprising Wiltshire unitary authority. To the west of the Borough is the Wiltshire town of Royal Wootton Bassett and rural north Wiltshire, with the M4 motorway and train lines passing through this area linking to Chippenham, Bath and Bristol. The north of the Borough is defined by the River Thames floodplain, beyond which is the southern part of Cotswold District and then the Cotswolds National Landscape. To the east is Vale of White Horse District, which is mainly a rural area but through which passes the A420 to Oxford and the train line to Didcot. To the southeast is then the extensive rural landscape of the North Wessex Downs National Landscape, through which passes the M4 linking to Reading.
- 2.3.2. Within the Borough, the main urban area dominates the central southern area, particularly once account is taken of a committed strategic growth area to the east (New Eastern Villages, NEV) and extensive flood zones (the River Cole). To the south is the National Landscape (NL), with a series of historic villages at the foot of the downs (scarp slope), as is a characteristic feature of the wider Vale of White Horse. Of these villages Wroughton is the largest, followed by Wanborough and then several smaller villages (Chiseldon is different as it is located on high ground within the NL). At the northeast edge of the urban area is a key industrial area, and then at the northern edge are the two 'Blunsdons', where there is extensive recent and committed growth. Finally, Highworth is a market town associated with the raised ground of the Mid Vale Ridge.

*Figure 2.1: Overview of the Borough*



- 2.3.3. Focusing on the main urban area (i.e. the town, which has a population of ~235,000, making it one of the largest towns in England), the first point to make is that Swindon has long been a key hub of economic activity in the national context. Swindon is strategically located at the watershed between the Thames Valley to the east, linking to the Oxford growth corridor including 'Science Vale', and the Avon Valley to the west, linking to Bristol and Bath at the heart of the 'Western Gateway',<sup>3</sup> plus Swindon has linked to Reading and London via the M4 since the latter 20<sup>th</sup> Century. The scale of Swindon's growth has been unprecedented at times, namely in the 19<sup>th</sup> Century as it grew from a hilltop market town to the nation's 'Railway Town' (the Old Town and New Town fused in 1900), and then in the 20<sup>th</sup> Century as the town expanded greatly alongside industry, most notably car manufacturing at Honda from 1985, and major office hubs developed in the town centre and elsewhere along new road corridors. Today the town centre faces significant challenges (discussed below), but overall the town remains a major piece in the puzzle of national economic growth, not least because of its potential to link to and complement the Oxford to Cambridge Arc.
- 2.3.4. Within the urban area the town centre is a major focus of the current Local Plan, with the clear aim being to implement and build upon the Heart of Swindon Vision published in March 2025. This is a focus of detailed discussion below, but a key initial point to note here is the proposal for a "tactical iterative approach" that recognises a need to build investor confidence and momentum over time (whilst still at pace) rather than setting ambitions that risk going undelivered and cumulatively undermining the overall strategy. This is of key relevance to the Heart of Swindon Vision aspiration to deliver up to 8,000 new homes in that committing to delivery through the Local Plan and then under-delivering risks the Borough facing 'the presumption' (see discussion above).

*Figure 2.2: Select proposals from the Heart of Swindon Vision*



- 2.3.5. Across the wider urban area there is also a need to take a strategic approach to growth through the Local Plan in response to a range of spatial issues and opportunities. Matters are explored in detail below, but key opportunities are around directing growth, including high density development, so as to: A) deliver on a bus connectivity strategy; B) enhance Swindon's already extensive network of strategic walking and cycling links, linking closely to the green and blue infrastructure corridors that permeate through the urban area; C) regenerate and enhance existing local centres and neighbourhood hubs; D) ensure good access to community infrastructure including schools and health facilities; and E) support a targeted approach to renewal and potentially redevelopment of existing industrial, commercial and office areas. A transport and accessibility 'vision' is at the very heart of this, and, in this regard, the Local Plan is being prepared in the context of Swindon's Local Transport Plan 4 (2022), a Local Cycling and Walking Infrastructure Plan (2022) and the emerging Swindon Borough Transport Strategy.

<sup>3</sup> The Western Gateway was the pan-regional partnership for South Wales and Western England until early 2025.



2.3.6. Moving to the urban edge, this is a key focus of discussion below, as part of work to explore growth options/scenarios, but by way of initial orientation:

- North – new communities have been delivered alongside strategic infrastructure over recent years and decades, most recently Tadpole Garden Village, which delivered well following construction starting in 2014, and which has delivered strategic infrastructure including a secondary school. Further growth in this area is an option, but aligning with the aforementioned vision-led transport strategy is a challenge, plus this area comprises land between the Mid Vale Ridge to the east and the River Ray to the west.
- Northeast – Broad Blunsdon has seen significant piecemeal expansion over recent years and there are pending planning applications for further growth of this nature. To the south is then Kingsdown, which is a strategic allocation in the adopted Local Plan and now has outline planning permission for 1,552 homes and a new local centre.
- East – to the north of the A420 is the village of South Marston and the town's main industrial area including the former Honda works now being redeveloped as Panattoni Park. To the south of South Marston, stretching south well-beyond the A420 to the southeast edge of Swindon (north of Wanborough), is New Eastern Villages (NEV), which was allocated in the adopted Local Plan to deliver 8,000 homes by 2026 but which has faced major delivery challenges, and to date has delivered just a small handful of new homes, although a new strategic link road is nearing completion.
- Southeast – this area is associated with Junction 15 of the M4, the villages of Wanborough and Chisledon and extensive constraint in the form of the NL (with land outside the NL highly visible from the Ridgeway National Trail). The Great Western Hospital is close to the M4 junction, and stretching north from the junction is the aforementioned new road link to NEV. To the west of the hospital a new community is near complete comprising around 900 homes alongside infrastructure including a primary school and some employment land, following permission granted at appeal in 2011 (which followed a dismissed appeal for 1,550 homes plus a university campus).
- South – the east of this sector is associated with green / blue infrastructure including Coate Water Country Park and a golf course, and there is limited growth opportunity (at least greenfield). To the west is then the Wichelstowe adopted strategic allocation, which is coming forward in phases (East, Middle and West Wichel) with construction having commenced at East Wichel in 2007, and at least a further 1,620 homes expected in the current plan period including to deliver a further 3fe primary school.
- West – the western edge of the urban area is mostly defined by the boundary with Wiltshire and, whilst due consideration must be given to possible cross-border growth, in practice: A) the Wiltshire Local Plan is at a very advanced stage (Examination in Public) which creates a practical challenge; and B) this is a relatively poorly performing direction for strategic growth including because of issues around transport connectivity, capacity at M4 J16, settlement gaps and the River Ray corridor.

2.3.7. The adopted Local Plan key diagram is shown below, showing strategic allocations that have now delivered (1 and 4), are delivering (5) and are set to deliver (2 and 3).

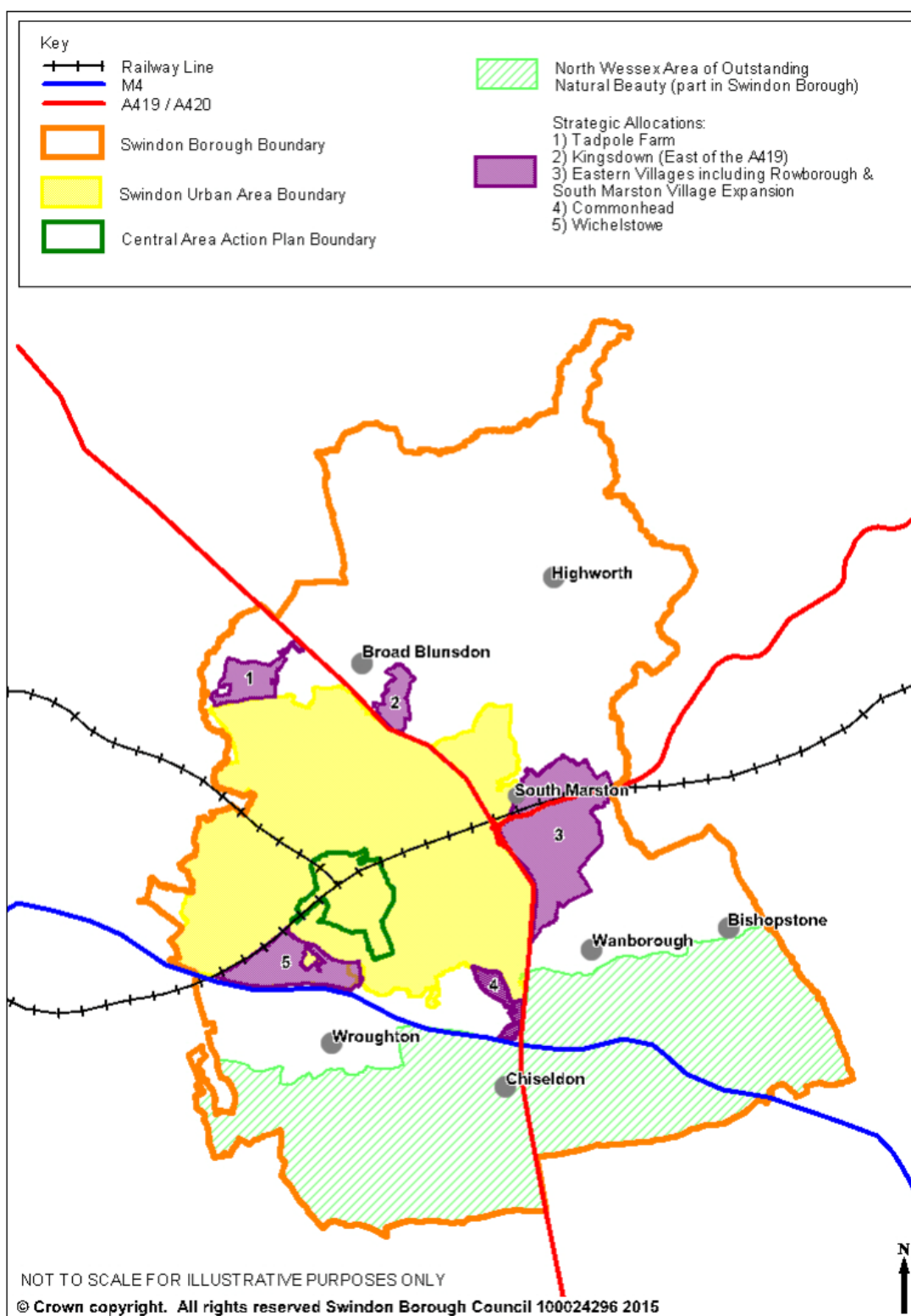
2.3.8. One point to note from Figure 2.3 is that within the 'white land' north of Swindon to the east of Tadpole Garden Village (1) the urban edge has now expanded through the Abbey Farm site for 350 homes (with a primary school) permitted in 2015 in light of 5YLHS challenges and, furthermore, there is now a pending planning application for a 410 home extension. This highlights the need for a long term strategic approach, with comprehensive growth that avoids issues and maximises benefits ('planning gain').

2.3.9. Finally, with regards to orientation across the wider Borough beyond the urban area:

- The North Wessex Downs NL – is shown below and has been discussed above. At the foot of the Downs, Wroughton is a potential strategic growth location discussed below, and there is also an important sector of land between Wroughton and M4 J16.

- East – the relationship between the Mid Vale Ridge and the Vale of White Horse / Thames Valley either side is a key characteristic feature of the Borough. Northeast of the urban area there is an important rolling wooded landscape stretching to Highworth and then on to Faringdon in Oxfordshire; both characteristic towns of the Ridge.
- North – this area is close to the confluence of the River Ray with the River Thames, and just upstream of here is the town of Cricklade (Wiltshire) and internationally designated Cricklade North Meadow, where A419 air pollution is an issue.

Figure 2.3: The adopted Local Plan Key Diagram (2015)



## 2.4. The plan period

- 2.4.1. The plan period is 2023 to 2043, in light of NPPF paragraph 22 which states:

*“Local plans] should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead...”*

- 2.4.2. With regards to the start of the plan period ('base date'), 2023 reflects the fact that plan-making has been delayed, and some work has already been completed to establish development needs (etc) for a plan period from this date. Housing delivery since the start of the plan period has been below the rate needed in order to deliver on housing need, which is 1,205 homes per annum (as discussed below), such that a plan base date of 2023 can be considered proactive as there will be a need to make good the deficit since the start of the plan period. However, on the other hand, it is increasingly seen as good practice for the plan base date set as close as possible to the date of plan adoption, recognising that the Government's 'standard method' for calculating housing need is updated annually and includes an upwards adjustment for affordability such that any under-supply is captured (assuming supply affects affordability).

- 2.4.3. With regards to the plan end date, 2043 reflects a logical 20 year period from the start date, and is considered to represent good practice in light of NPPF paragraph 22. Longer plan-periods support a vision-led approach including with consideration given to long term economic growth and infrastructure strategy, potentially across a sub-region. However, on the other hand, there is a need to consider the national devolution agenda, under which sub-regional Spatial Development Strategies (SDSs) are forthcoming.

### Completions and commitments

- 2.4.4. It is worth noting here that, as of the start of the plan period (1<sup>st</sup> April 2023) 831 homes have been completed and a further 12,767 homes are set to come forward at sites with planning permission. Furthermore, there are adopted Local Plan allocations without permission that can be rolled forward into the new Local Plan, with the current proposal to support an additional 3,498 homes from these sites (albeit this figure remains subject to adjustment, recognising that the proposal is to support additional homes relative to the adopted Local Plan proposal). Similarly, in respect of employment land, significant employment land has been delivered since the start of the plan period and a very large amount of employment land has planning permission. As such, a key aim for the Local Plan is to identify a supply of land to provide for development needs (discussed below) over-and-above existing 'completions' and 'commitments'.

## 2.5. Plan objectives

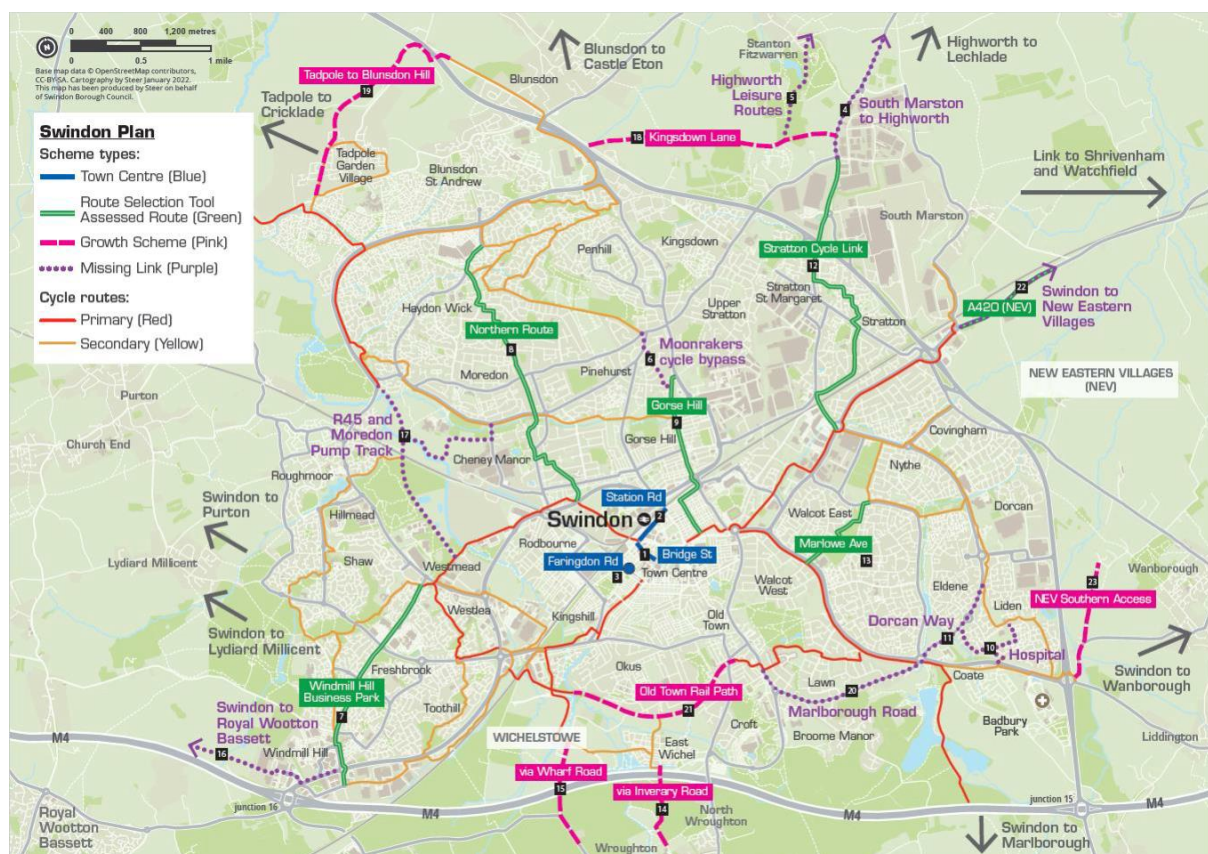
- 2.5.1. It is important to set plan objectives early in order to guide the plan-making process. Also, the plan objectives are a key input to the SA process, because 'reasonable alternatives' must be defined taking account of *“the objectives... of the plan.”*

- 2.5.2. The plan objectives are as follows:

- **Regenerating Swindon Town Centre** – “... make Swindon better by revitalising the Town Centre as the heart of Swindon through supporting and delivering mixed-use residential and commercial development here, supported by the appropriate social and transport infrastructure.”
- **Place and Belonging** – “... make Swindon better and fairer by enhancing a sense of community belonging and wellbeing, whilst simultaneously developing and enhancing a sense of pride in the Swindon identity through supporting good place-making and preserving/enhancing Swindon's history and heritage. This includes supporting the delivery of high-quality, sustainable development with the right infrastructure that will enable or improve access to key services and social/leisure opportunities.”

- **Homes for all** – “... make Swindon better and fairer by ensuring the right types and tenures of housing are delivered to meet the needs of our current and future residents. This includes pushing for affordable housing, encouraging different types of housing (such as specialist housing), and making sure that new development is well-designed to meet a variety of needs.”
- **Economic prosperity** – “... create a fairer, better, more prosperous Swindon by facilitating a resilient economy that maximises on Swindon’s strategic location and town centre redevelopment potential, delivering opportunities for all.”
- **Connected Communities and Sustainable Movement** – “... connect people, neighbourhoods and communities by ensuring there is effective and sufficient sustainable transport mode choice, improving connectivity for everyone of any ability, reducing public transport times and, as a result, reducing car dependency, making Swindon a better, fairer and greener place to live and work.”
- **Low Carbon** – “... push for a greener Swindon by seeking to achieve net zero carbon by requiring appropriate mitigation and adaption measures for new and existing development, and by improving the sustainable travel offer.”
- **Health and Wellbeing** – “... achieve a better, fairer and greener Swindon, we will deliver healthy, active and inclusive communities through a holistic plan-led approach that secures good quality housing, enhanced connectivity and accessibility to key services, social and leisure infrastructure, and inclusive design.”

*Figure 2.4: The Local Cycling and Walking Infrastructure Strategy – one key source of evidence to inform consideration of growth options aimed at delivering a vision-led growth strategy*



## 3. The SA scope

### Introduction

- 3.1.1. The scope of the SA refers to the breadth of sustainability issues and objectives that are taken into account as part of the appraisal of reasonable alternatives and the emerging plan. It does not refer to the scope of the plan (discussed above) nor the scope of reasonable alternatives (discussed in Part 1).
- 3.1.2. The aim here is to introduce the reader to the *broad scope* of the SA. Further information is presented in a stand-alone Scoping Report (2023); however, it is important for the SA scope to remain flexible, responding to the emerging plan and reasonable alternatives, and the latest evidence-base.

### Consultation on the scope

- 3.1.3. The statutory consultation bodies and neighbouring local authorities were consulted on the Scoping Report in 2023 and all responses received have been taken into account. Comments on the SA scope are welcome at the current time.

### The SA framework

- 3.1.4. The key outcome of scoping work is the SA ‘framework’ under which subsequent appraisal can be undertaken, with a view to ensuring that appraisal is suitably focused. At the core of the framework is a list of sustainability objectives under topic headings.
- 3.1.5. The SA framework is discussed further below, but at its core are the following topics:
- Accessibility
  - Air quality
  - Biodiversity
  - Communities
  - Climate change adaptation
  - Climate change mitigation
  - Communities, and health
  - Economy & employment
  - Equality
  - Historic environment
  - Housing
  - Landscape
  - Soils and resources
  - Transport
  - Water
- 3.1.6. Appendix II presents the SA framework in full, specifically the objectives defined for each of the above topics at the scoping stage in 2023. N.B. these objectives have not been updated since 2023, but it is recognised that they will need a refresh subsequent to the current consultation, and there is also scope to adjust the list of topic headings (e.g. adding one or more topics, although keeping the SA framework concise is important).
- 3.1.7. Finally, note that under the “equality” heading the appraisal aims to integrate Equality Impact Assessment (EqIA) as part of which consideration is given to the effects of the plan for groups of people with protected characteristics under the Equality Act 2010, namely age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

## **Part 1: Work to date**

## 4. Introduction to Part 1

### Overview

- 4.1.1. Several formal consultations having been held to date. However, the aim here is not to relay the entire backstory, nor to provide an ‘audit trail’ of steps taken.
- 4.1.2. Rather, the aim is to report work undertaken to examine **reasonable alternatives** in 2025 ahead of the current consultation. Specifically, the aim is to:
  - explain the reasons for selecting the alternatives dealt with – see **Section 5**
  - present an appraisal of the reasonable alternatives – see **Section 6**
  - explain the Council’s reasons for selecting the preferred option – see **Section 7**
- 4.1.3. Presenting this information aligns with the requirement for the SA Report to present an appraisal of reasonable alternatives and “*an outline of the reasons for selecting the alternatives dealt with*”.

### Reasonable alternatives in relation to what?

- 4.1.4. The requirement is to examine reasonable alternatives (RAs) taking account of “*the objectives and geographical scope of the plan*”, which suggests a need to focus on the **spatial strategy**, i.e. providing for a supply of land, including by **allocating sites**, to provide for objectively assessed needs alongside delivering on wider plan objectives. Establishing a spatial strategy is clearly a central objective of the Local Plan.<sup>4</sup>
- 4.1.5. Spatial strategy alternatives can perhaps more accurately be described as **alternative key diagrams**, where the key diagram is a reflection of established development requirements, spatial strategy and site selection.
- 4.1.6. Alternative key diagrams can then be termed ‘**growth scenarios**’ as a shorthand.
- 4.1.7. Housing and employment land are key matters to explore across growth scenarios, and providing for Gypsy and Traveller accommodation needs is a further consideration.

### What about site options?

- 4.1.8. Whilst individual site options clearly generate interest, they are not RAs in the context of most local plans. Were the objective to allocate one site, then site options would be RAs, but that is rarely the case for local plans. Rather, the objective is to allocate a *package* of sites and so RAs must be in the form of alternative *packages* of sites, in so far as possible. Nonetheless, consideration is naturally given to the merits of site options as part of the process of defining RA growth scenarios (Sections 5.3 & 5.4).

### What about other aspects of the plan?

- 4.1.9. As well as establishing a spatial strategy, allocating sites etc, the Local Plan must also establish policy on thematic district-wide issues, as well as site-specific policies. These can be broadly described as development management (DM) policies. However, it is a challenge to define “reasonable” DM policy alternatives, and, in this case, none are identified following discussion with Officers.<sup>4</sup> DM policies are discussed further in Part 2 and, as part of this, informal consideration is given to the question of RAs, and another important consideration is the Government’s commitment to publishing National Development Management Policies (NDMPs), with these expected in 2025.

<sup>4</sup> Another consideration is that to be ‘reasonable’ alternatives must be meaningfully different to the extent that they vary in terms of **significant effects**, where significance is defined in the context of the plan (taken as a whole). A focus on key diagram RAs (‘growth scenarios’) guarantees that this will be the case and so negates the need for a process of screening what should and should not then be a focus of subsequent work to explore (i.e. define, appraise and consult upon) RAs. It is also important to note that appraising a draft proposal versus the ‘do nothing’ option does not equate to an appraisal of RAs, because do nothing is the baseline and there is a separate requirement, as part of the SA process, to appraise the draft plan against the baseline.

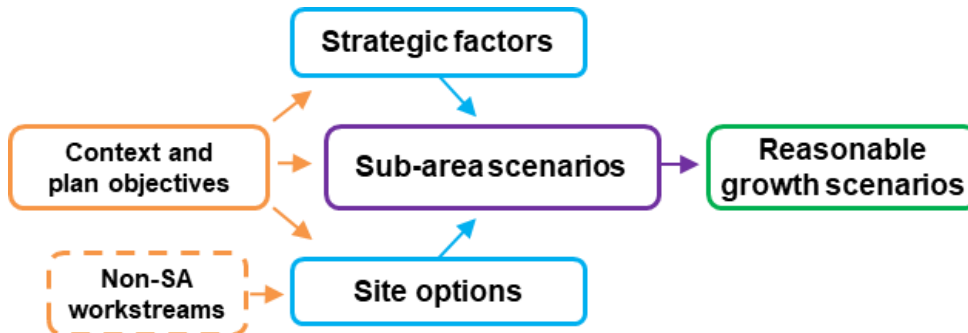


## 5. Defining growth scenarios

### 5.1. Introduction

- 5.1.1. The aim here is to discuss the process that led to the definition of reasonable growth scenarios in 2025. To reiterate, growth scenarios equate to **reasonable alternatives**.

Figure 5.1: A standard broad process to define growth scenarios



- 5.1.2. This process is described across the following sub-sections:

- **Section 5.2** – considers strategic factors ('top down').
- **Section 5.3** – considers individual site options ('bottom up').
- **Section 5.4** – draws matters together (top down / bottom up).
- **Section 5.5** – concludes on reasonable growth scenarios.

- 5.1.3. With regards to the **context**, the first point to make is that key context is provided by plan-making stages over recent years, and a number of consultation response received are referenced/quoted below.

- 5.1.4. Secondly, there is a need to acknowledge that numerous 'non-SA' workstreams must feed-in, but there are invariably challenges in terms of timings.<sup>5</sup> Key non-SA workstreams to account for as part of work to define RA growth scenarios include:

- Workstreams examining site options – officer led work to examine the merits of site options, both in isolation and in combination, must clearly be a major input to work described here to define RA growth scenarios. The officer led work is a major undertaking, e.g. drawing upon specialist inputs and the findings of stakeholder engagement, and this has fed in as far as possible.
- Scheme specifics – generating an understanding of what specific site options would or could deliver (e.g. in terms of land uses and infrastructure) involves a detailed process, and attention naturally focuses on emerging proposed allocations more so than emerging omission sites (see Section 5.3). However, it is both emerging proposed allocations and omission sites that must be a focus of the process set out below.
- Infrastructure Delivery Plan (IDP) – infrastructure planning is a major undertaking for any local plan, and the reality is that the complexity of the work means that there is a pragmatic need to focus attention on the emerging preferred approach, with limited if any potential to explore alternative growth scenarios. Also, the reality is that it is work that must be completed late in the day, once the preferred approach is near-finalised and taking into account a range of other workstreams.
- Viability assessment – understanding of viability parameters / limitations must not only inform writing of policy requirements but also spatial strategy and site selection.

<sup>5</sup> Equally, there are some workstreams that cannot be completed in time for this current Regulation 18 consultation and so will need to feed in subsequently, i.e. prior to finalising the plan for publication under Regulation 19, with one notable example being strategic transport modelling. In short, working in the context of evidence base limitations is a reality of local plan-making.



## A note on limitations

- 5.1.5. It is important to emphasise that this section does not aim to present an appraisal of reasonable alternatives. Rather, the aim is to describe the *process* that led to the *definition* of reasonable alternatives. This amounts to a relatively early step in the plan-making process (a means to an end, i.e. alternatives for appraisal) which, in turn, has a bearing on the extent of work that is proportionate, also recalling the legal requirement, which is to present an “*outline of the reasons for selecting alternatives...*” [emphasis]

## 5.2. Strategic factors

### Introduction

- 5.2.1. The aim of this section is to explore strategic factors (issues and options) with a bearing on the definition of growth scenarios. Specifically, this section of the report explores:
- Quantum – how much development is needed (regardless of capacity)?
  - Broad spatial strategy – broadly where is more/less suited to growth; also, what growth typologies are supported, e.g. large (‘strategic’) sites versus smaller sites?

### Quantum

- 5.2.2. This section sets out understanding of development needs in respect of housing, employment land and Gypsy and Traveller accommodation in turn. In each case, in addition to setting out understanding of objectively assessed need (NPPF para 11), the aim is to also explore *high level* arguments for the Local Plan providing for a quantum of growth either above or below objectively assessed need.

### Housing

- 5.2.3. A central tenet of local plan-making is the need to **A**) objectively establish needs (‘policy-off’); and then **B**) develop a response to those needs through the local plan (‘policy-on’). Planning Practice Guidance explains: “*Housing need is an unconstrained assessment of the number of homes needed in an area. Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from... establishing a housing requirement...*”
- 5.2.4. With regard to (A), the NPPF states that local housing need (LHN) should be established via an assessment “conducted using the standard method”. With regard to (B), most local authorities respond to LHN by setting a housing requirement that equates precisely to LHN. However, under certain circumstances it can be appropriate to set a housing requirement that departs from LHN.
- 5.2.5. For Swindon Borough the Government’s standard methodology establishes an **LHN** figure of 1,205 dwellings per annum (dpa), or 24,100 homes over the plan period.
- 5.2.6. Setting the **housing requirement** at 1,205 dpa over the plan period and identifying a supply sufficient to deliver on the requirement is challenging but achievable assuming a carefully selected strategy and associated suite of site allocations. The adopted Local Plan had envisaged a stepped requirement, where the requirement would be set at 1,150 dpa between 2011 and 2016 and then 1,625 dpa between 2016 and 2026 and, in practice, annual housing completions with Swindon Borough have ranged between 595 dwellings (in 2013-14) to a high of 1,699 dwellings (in 2016-17). Most recently, delivery was in the region of 1,000 dpa over the years 2021/22 to 2022/23 and then lower in 2023/24, specifically 831 dpa, as discussed above.

- 5.2.7. This being the case (the fact that 1,205 per annum is challenging but achievable in pure delivery terms) and also given that ‘headline’ constraints to growth (NPPF para 11bi) are overall quite limited across the Borough, it is possible to rule out the possibility of a housing requirement set below LHN. As part of this, it is also important to recognise that a requirement set below LHN means generating ‘unmet need’ that must then be provided for elsewhere and, in reality, there is no possibility of Swindon Borough exporting unmet need to a neighbouring area (see discussion below).
- 5.2.8. The final consideration here is then whether there is a high level case for remaining open to the possibility of a housing requirement set above LHN, as part of work to define RA growth scenarios. This is an important consideration across the south of England, as there are many sub-regions and groups of local authorities where unmet need is a very clear and pressing issue, such that centrally important to plan-making is exploring ‘high growth’ scenarios involving a housing requirement set above LHN in order to make some provision for unmet need, for example this is the case for the Bristol and Oxford sub-regions (or ‘city-regions’). For the Swindon sub-region unmet need is not a ‘clear and pressing’ issue but that is not to say that there is no risk that must factor-in, including noting NPPF paragraph 28, which deals with “effective and on-going joint working” and explains: *“Plans come forward at different times, and there may be a degree of uncertainty about the future direction... In such circumstances... authorities... will need to come to an informed decision on the basis of available information, rather than waiting for a full set of evidence from other authorities.”*
- 5.2.9. Taking Swindon’s neighbouring local authorities in turn:
- Wiltshire – clearly relates very closely to Swindon and, indeed, it can be argued that the Swindon housing market area stretches a considerable way into Wiltshire, plus the M4 functional economic area clearly links the two authorities. The Wiltshire Local Plan was submitted in 2024 under ‘transitional arrangements’ meaning that its starting point is an understanding of LHN on the basis of the 2023 standard method, which is 1,917 dpa, as opposed to the 2024 standard method which provides a figure of 3,525 dpa. The submitted plan proposes to set the housing requirement at LHN over the plan period as a whole, but with a stepped requirement, whereby the requirement is set below LHN in the early years of the plan and then above LHN in later years (shown [here](#)). This is despite delivery over the past three years averaging 2,018 dpa. A clear issue is the lack of identified supply to deliver on this higher housing requirement over the latter part of the plan period and, furthermore, the Inspector wrote to the Council in April 2025 suggesting the need to extend the plan period (to ensure a plan period extending 15 years from the point of plan adoption (also, the Inspector raised certain concerns with the identified supply). Overall, providing for ~2,000 dpa appears to be challenging, let alone ~3,500 dpa, and the Council will be required to prepare a new plan to provide for this higher figure (if at all possible) if and when the plan currently being examined is adopted (NPPF para 236). This suggests a *future* risk of unmet need, and one other consideration is that Wiltshire could come under pressure to provide for unmet needs from the west and/or south. However, there is no certainty ahead of future work to explore supply options across Wiltshire and the simple fact is that there are extensive parts of the County that whilst rural / not well connected are not highly constrained NPPF para 11bi (particularly footnote 7) terms.
  - Cotswold – is at an early stage of plan preparation, with a high level consultation held in 2021 that presented a series of scenarios where Scenario 8 involved *“Request neighbouring authority to deliver some of the housing need”*. This was not the preferred scenario, but it was explained: *“Neighbouring authorities accommodating some unmet housing need of the District requires further assessment (Scenario 8).”* Since that time understanding of standard method LHN has increased dramatically from 504 dpa to 1,036 dpa and this is in the context of recent delivery averaging 358 dpa (2021/22-23/24). As such there is a clear risk of unmet need, but there is no certainty ahead of further work by the District Council to explore supply options. Furthermore, even if there were to be an evidenced unmet need, there would then be the separate question of whether Swindon Borough is well placed to make provision for it, including noting that links primarily via the constrained A419 corridor.

- Vale of White Horse – a Joint Local Plan with South Oxfordshire District was submitted in 2024 under ‘transitional arrangements’ meaning that its starting point is an understanding of LHN on the basis of the 2023 standard method, which is 1,212 dpa, as opposed to the 2024 standard method which provides a figure of 2,191 dpa. There is also the question of whether the Joint Local Plan should additionally make provision for unmet need from Oxford and, if so, how much, with this matter a key focus of the ongoing examination in public. Recent delivery has averaged 2,294 homes (2021/22-23/24) which suggests low risk of unmet need, plus there is a need to factor-in that Swindon only links closely to Shrivenham/Watchfield and Faringdon (‘Western Vale’), where constraints to growth are not particularly high. A further consideration is impending Local Government Reorganisation (LGR), as part of which one factor will be defining new local authority boundaries with a view to providing for housing needs.
- 5.2.10. There are other local authorities that could be discussed as feasible generators of unmet need that could feasibly flow towards Swindon, but it is considered appropriate to focus on the three authorities discussed above as most closely linked to the Borough.
  - 5.2.11. Overall, the conclusion is that the risk of unmet need from Cotswold District must factor-in as a consideration as part of work to define RA growth scenarios, albeit it is very difficult to say precisely how, given limited progress on their Local Plan. Any authority must clearly demonstrate ‘no stone left unturned’ before seeking to export unmet need.
  - 5.2.12. Finally, beyond the matter of unmet need, there is a need to consider the possibility of setting the housing requirement above LHN on the basis of “growth ambitions linked to economic development or infrastructure investment” (NPPF paragraph 69). This is a consideration for Swindon, for example in light of the discussion above at paragraph 2.3.3. However, there is little or nothing in the way of national sub-regional strategy that serves as evidence for a housing requirement set above LHN on growth and/or infrastructure grounds. With regards to local evidence a first port of call is the Employment Land Review, which explores employment growth scenarios, but this does not provide clear evidence in support of a requirement > LHN. Finally, with regards to infrastructure, there is an aspiration for a second train station to the east, which would clearly need to be facilitated by growth, but this is a long term aspiration given the situation with NEV, as discussed below, and would likely require 4-tracking to Didcot.
  - 5.2.13. There is a clear case for focusing attention on growth scenarios involving setting the housing requirement at LHN (with a supply sufficient to provide for this year-on-year, which could necessitate a ‘supply buffer’ as a contingency for delivery issues).
  - 5.2.14. However, given a risk of unmet need from Cotswold there is also a need to remain open to exploring higher growth scenarios, subject to consideration of supply options.

### Employment land

- 5.2.15. The Employment Land Review (ELR, 2025) explores employment growth scenarios, identifies a preferred scenario (employment land ‘demand’), considers existing and committed sources of supply and then concludes on the “supply demand balance” to be addressed by the Local Plan, including via allocations to deliver new supply.
- 5.2.16. Paragraph 2 of the report aims to set the scene as follows (emphasis added):
 

*“Swindon faces challenges but also has **huge economic potential**, as the national and global economy embraces a range of new sectors around technology and the green economy. Swindon is well placed to take advantage of this with land investment opportunities and rich economic history, but continued investment in skills and regeneration including the town centre is required.”*
- 5.2.17. With regards to ‘demand’, the ELR settles on a net growth of 695 jobs p.a. as the preferred baseline scenario, which is the figure derived from Experian forecasts. However, the ELR considers a variety of scenarios that present a growth in net jobs ranging from 51 to 1,252 p.a. Within these, the ‘Labour Supply’ scenario is of note, which aims to balance the growth of jobs and homes on the assumption of homes growth in line with standard method LHN, which sees growth of 1,137 jobs p.a.

- 5.2.18. The next step is then to translate the preferred jobs growth demand figure (695 p.a.) into a demand (or 'need') figure for employment land over the plan period, with a key distinction between land for industry and offices. The conclusion is a need for 160 ha additional land for industry over the plan period and 12 ha additional land for offices.
- 5.2.19. Moving on to supply, the first step discussed in the ELR is to establish existing supply from sites already delivered in the plan period and with planning permission. Having done so, the residual need figure for industrial land reduces significantly to 29 ha but the residual need figure for office land increases to 15 ha because of the recent and ongoing trend for office space to be redeveloped for housing and other uses.
- 5.2.20. The final step is then to identify potential 'new supply' from the intensification of existing employment sites, albeit the ELR must apply caution in respect of making assumptions regarding policy choices to be made through the Local Plan (e.g. certain sites might be identified through the ELR as having capacity onsite for intensification, but there could be implications for the surrounding area of road corridors that cannot be picked up by the ELR but are a consideration for the plan). Overall the ELR identifies the potential for 40 ha new industrial land and 8 ha new office land.
- 5.2.21. The net outcome is then the 'supply / demand balance' for the Local Plan:
- Industrial land – a 10.65 ha **over-supply**, which indicates no pressure to allocate new land and flexibility to consider redevelopment of some land for alternative uses.
  - Office land – a 7.3 ha **under-supply**, such that the Local Plan must consider identifying additional supply, which primarily means through site allocations.
- 5.2.22. However, there are wide ranging caveats to this analysis, as set out in the ELR:
- With regards to the office land under-supply:
    - Some of the identified 'new supply' in respect of industrial land could potentially come forward as office space, seeking to bring supply and demand more into balance. In turn, this is a policy consideration for the Local Plan, including "integrated office space within factories and warehouses."
    - The 8 ha identified new supply could be lower (and hence the under-supply higher), because it assumes new office floorspace at sites that would not align with the Council's spatial strategy (discussed further below), which is one of building momentum behind a town centre vision that includes a strong focus on new office floorspace. However, on the other hand, a strategy focused on new office floorspace in the town centre will mean a strategy involving sites coming forward with high plot ratio assumptions (i.e. high density) such that less land is needed.
    - A further consideration is whether the Local Plan will support the redevelopment of office sites for alternative uses over-and-above levels assumed through the ELR.
  - With regards to the industrial land, the key point is that there is also a need to look beyond the 'technical over-supply' to consider more qualitative factors around ensuring a diverse supply in terms of type and location. On this basis the ELR strongly suggests a need for ongoing consideration of options for new employment land regardless of the technical over-supply - see Box 5.1.
  - To reiterate, the ELR work to consider the supply/demand balance is undertaken on the assumption that demand comes from jobs growth of 695 p.a. but there are arguments that can be made for assuming a higher figure.
- 5.2.23. Presented below is a series of charts taken from the ELR (2025). It is also worth ending this discussion with a key statistic from the ELR, which is that: "

*In 2021, the borough's GVA per hour worked (£50.85) was nearly 1.5 times greater than that of the South West (£34.48) and 1.3 times greater than England's (£38.91)."*

Figure 5.2: Indexed office floorspace change



Figure 5.3: Office floorspace vacancy over time

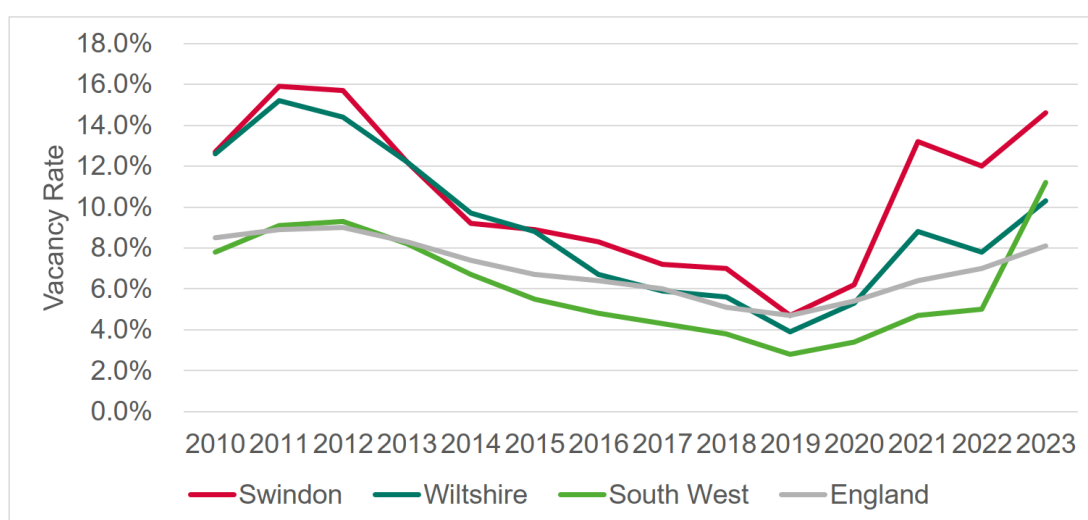
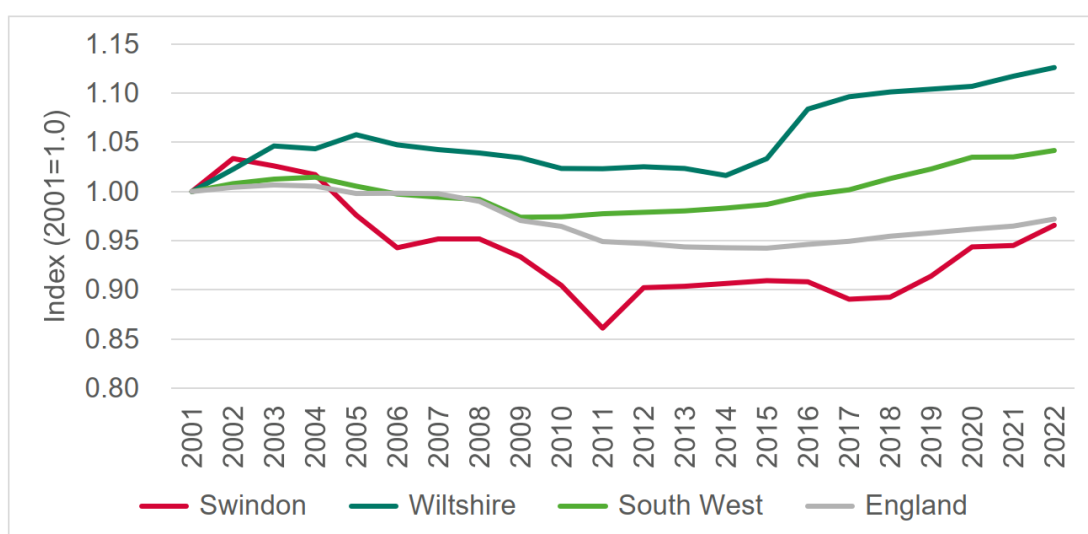


Figure 5.4: Indexed industrial floorspace change



**Box 5.1: Discussion of qualitative employment land needs and supply opportunities**

The ELR notes that the identified industrial land supply is concentrated at two sites: 1) the former Honda site (now owned by Panattoni; 139 Ha); and 2) the Great Stall West site (assumed to be in Tritax Symmetry ownership; 41 Ha). These sites could well primarily deliver warehousing/logistics and are also in close proximity, which serves to highlight the importance of looking beyond headline demand/supply balance figures to consider the needs of small – mid-sized businesses not well suited to locating on major industrial parks dominated by warehouses and HGVs.

The ELR explains (emphasis added):

*“This also reflects what the market is currently seeking. Stakeholders... noted that inward investors may wish... a freehold arrangement. While both of the above major sites could feasibly be sold off in parts, it is unlikely... due to strategic private sector ownership. **The Council may therefore wish to consider providing additional supply to meet a wider range of needs. This could mean allocating sites specifically for longer-term inward investment opportunities.** Ones that are in public ownership present the most realistic opportunity for freehold sale – such as i54 in Wolverhampton / South Staffs... A few stakeholders have suggested sites [close] to the M4... working with Wiltshire Council...*

Another suggestion (raised through stakeholder engagement, as opposed to an ELR recommendation) is *“strategic land greenfield release to capture major foreign direct investment.”*

The ELR also explains that Swindon lacks a science and technology park, and there could be an opportunity here around supporting advanced manufacturing and research and development, building on the town’s industrial heritage and attracting sectors like sustainable technology.

This need not necessarily mean the urban edge, as a focus could be around the station quarter where several knowledge-based industries are gathering (ICAST, UKRI and the UK Space Agency) as well as higher and further education providers.

Windmill Business Park at near M4 J16 is also flagged, although this part of the Borough is less well-linked to Oxford, with the ELR explaining: *“A new science and technology offer could also stimulate investment in the borough from businesses currently located in nearby towns such as Oxford, Bath and Reading which... cannot meet their needs. In Oxford, for example, there is a known lack of R&D space for burgeoning sectors...”*

Finally, the ELR flags a potential focus on the semi-conductor industry as an opportunity to explore.

The ‘greening’ of logistics and warehousing is another industry is another strategic opportunity to explore, because of the Borough’s existing transport and logistics profile linked to the railway, the M4 and BMW, and noting a strategic location between London and the Gigafactory in North Somerset and the Port Talbot Steelworks once they reopen with an electric furnace.

The possibility of attracting higher education is also a longstanding opportunity, with the ELR concluding: *“There is existing provision in the FE sector in New College Swindon, and the Swindon and Wiltshire Institute of Technology (SAWIOT) but, leveraging existing infrastructure such as iCAST and Swindon UTC, there is potential for higher education provision in Swindon.”*

Finally, the ELR includes a focus on collaboration with Business West, Wiltshire and other organisations with a South West focus, but there is also a need to consider Swindon’s role facing east to Oxford and Reading/Slough/London. At the time of writing there is much uncertainty around whether Swindon will be located at the eastern extent of west-focused focused Strategic Authority under the Devolution Agenda, or the western extent of one focused on the Thames Valley.

## Gypsies, Travellers and Travelling Showpeople (GTSS)

- 5.2.24. The Borough currently has 44 authorised Gypsy and Traveller pitches and 1 Travelling Showperson plot. The Gypsy, Traveller, and Travelling Showpeople (GTSS) Accommodation Needs Assessment (2024) establishes a need for 35 new pitches and 19 Travelling Showperson plots, primarily over the early years of the plan period.
- 5.2.25. Providing for GTSS accommodation needs through Local Plans is often very challenging, including because of lack of sites being made available for this use in suitable locations. However, it is crucially important, as poor accommodation can be a barrier to maintaining the traditional way of life, can lead to tensions with settled communities and contributes to acute issues of relative deprivation, with Travellers on average having very poor outcomes across health, education and other indicators, as discussed [here](#). A recent [blog](#) prepared on behalf of the RTPi explained how failing to provide for Gypsy and Traveller accommodation needs in full is all too common.
- 5.2.26. It is crucial to tackle the issue rather than deferring to a follow-on plan, for example:
- Wiltshire – the Inspector examining the submitted Local Plan recently wrote to the Council explaining: “... we note that the Plan does not specifically address the matter of travellers housing needs as it is otherwise intended to be dealt with under a separate Gypsies and Travellers Development Plan Document (DPD)... anticipated to be adopted by Quarter 3 of 2025. In light of that situation, we would welcome an update on the current status of the... DPD, together with the Council’s view as to whether there should be provisions in the Plan to ensure certainty of how those needs would otherwise be met in the event that the... DPD were not to reach adoption.” As of February 2025 there were understood to be some issues, as reported [here](#).
  - Maidstone – the Local Plan was adopted in 2024 with reliance on a follow-on plan to meet a need for 500 pitches and 7 plots, and that plan has made limited progress.
  - Windsor and Maidenhead – the Local Plan was adopted in 2022 on the assumption that a follow-on plan would be adopted post-haste, but there has been no progress.<sup>6</sup>
  - Rugby – the Local Plan was adopted in 2019 with an unmet need to be addressed through a follow-on DPD, and now a need for 94 pitches is being dealt with through the emerging new Local Plan as discussed within a recent [Interim SA Report](#).<sup>7</sup>

## Conclusion on growth quanta

- 5.2.27. This section has considered housing needs, employment land needs and GTSS accommodation needs in turn. In summary:
- Housing – attention focuses on growth scenarios involving setting the housing requirement at LHN (with a supply sufficient to provide for this year-on-year, which necessitates a ‘supply buffer’ as a contingency for delivery issues). However, given the *potential risk* of unmet needs (in particular) there is also a need to remain open to higher growth (N.B. this is not the same as saying that there *are* unmet needs).
  - Employment land – in headline quantitative terms there is a need for new allocations to deliver office floorspace but not industrial land. However, there are also a range of important qualitative considerations, such that industrial land allocations remain a key matter warranting ongoing consideration as part of the local plan-making process.
  - GTSS – needs are clear and must be provided for in full. Unmet needs from elsewhere can also be a consideration but needs tend to be very localised.
- 5.2.28. The question of growth quanta to reflect across the RA growth scenarios is returned to in Section 5.5, following consideration of supply issues/opportunities and options.

<sup>6</sup> The Inspectors Report stated: “It is unfortunate that the Traveller Local Plan has been delayed, but... good progress has been made... Most recently, an Issues and Options Report and a Site Assessment Methodology were published for consultation.”

<sup>7</sup> The Inspectors Report stated: “Whilst the Plan does not provide a supply of deliverable and developable sites to meet the accommodation needs of gypsies and travellers in full, I am satisfied that the combination of the criteria based approach in Policy DS2 and a Gypsy and Traveller Site Allocations DPD will enable the Council to meet [needs].”

## Broad spatial strategy

5.2.29. The aim of this section is to explore ‘broad spatial strategy’ issues, opportunities and options, building upon the introductory discussion presented in Section 2.

5.2.30. It is important to re-emphasise that this amounts to an early high level discussion, with discussion of certain broad spatial issues and opportunities deferred to Section 5.4.

5.2.31. The broad spatial strategy has evolved over four Regulation 18 stages prior to the current consultation (also under Regulation 18). However, it is equally the case that there is now a proposal for a “new strategic direction”. This concept features prominently within the current Draft Local Plan consultation, which explains:

*“Whilst some of the Borough’s opportunities and challenges remain the same, a lot has changed since the last adopted Swindon Local Plan. With changes and opportunities comes new direction, and this Local Plan plans to focus on the following strategic directions which will positively contribute towards the Swindon Plans’ 3 missions.”*

5.2.32. The plan document goes on to identify two key spatial priorities:

- Town centre rejuvenation and urban housing density – “The Plan pays heed to the Heart of Swindon, noting the need to restore and rejuvenate Swindon Town Centre as the Borough’s activity hub through utilising partnerships and strategic alliances. The Town Centre will act as a... point of connectivity for all areas of Swindon.

This direction of travel is highly reliant on a ‘whole place’ approach, ensuring that policies use a holistic approach to support good place-making. As part of this, Town Centre mixed-use development will be supported and encouraged; allowing for both active frontages and a residential presence... The need to diversify the types of employment uses in the urban area is also emphasised, to bring vibrancy back...

There are significant messages within... feedback on creating an environment that is attractive to investment and supportive of change, and Swindon should be attractive to a wide range of people and age groups to live, work and invest time.”

- Environment and movement – “There is significant Council ambition for Swindon to be greener. The Local Plan will ultimately reflect this through setting out policies based on a Borough-wide pathway to lower carbon. This is an emerging document, but ultimately it aims to recommend approaches that allow us to build on Swindon’s strengths and recast Swindon as a greener place to live and do business. The Local Plan also sets out policies to protect green spaces...

The... approach to transport also factors into our low carbon ambitions. The move to a vision-led transport approach has meant setting out clear priorities for supporting more active travel and public transport usage... thinking about smarter growth and linking development and growth to existing and new sustainable transport corridors and hubs. It also means rediscovering our strengths for passenger and freight rail.”

5.2.33. These two key arms of the spatial strategy are discussed below in reverse order.

### Broad spatial strategy 1: Environment and movement

5.2.34. This aspect of the strategy is strongly supported. The new NPPF includes an emphasis on ‘vision-led’ transport planning, and detailed work has been undertaken to explore what this means in the Swindon context, albeit there remains a need for further work, e.g. see discussion above regarding the emerging Swindon Transport Strategy. Broadly six strategic transport corridors have been identified along which there is extensive committed growth and/or there is now the potential to focus growth with a view to delivering and funding/facilitating strategic upgrades in support of modal shift away from the private car and ease of accessibility to the town centre and other key destinations, e.g. the hospital and employment areas.

5.2.35. Taking the identified transport corridors in turn:



- North – the A4311 links the town centre to the committed Kingsdown strategic allocation via a number of residential estates (Penhill, Pinehurst), two large industrial/commercial areas, a retail/leisure area and a secondary school, plus this is the route that links the Blunsdons to the town centre. Aside from Kingsdown there is limited committed growth along this corridor and currently few sites available for allocation; however, by identifying this corridor the Council aims to encourage new site submissions (including from the Council as landowner, e.g. garage courts). Potential growth opportunities along this corridor include sensitive estate regeneration potential and the intensification of vacant brownfield land.
- East – the A4312/A420 corridor is of key strategic importance, linking the town centre to NEV, where the proposal is for at least 8,000 homes (as discussed below) and the possibility of further growth is an option to consider, e.g. with a view to a second train station, and recognising the importance of links to Oxford. Furthermore, located along the A4312 is Marlowe Avenue, which is the primary identified Urban Regeneration Area outside of the town centre, with an adopted masterplan (2022). Potential growth opportunities include the redevelopment of retail parks and vacant industrial land.
- Southeast – the A4259 links the town centre to the hospital and Coate Water via neighbourhoods that are in the 10% most deprived nationally (Walcott East and Park South). There is little in the way of currently identified new supply but, once again, the hope is that by signalling a clear ‘corridors focused’ growth strategy landowners (including the Council) will be encouraged to make land available. There is also an important recent estate regeneration scheme here, namely Queens Drive, which involved replacing 89 council owned homes constructed in the 1960s with 149 new high quality council owned affordable homes. Potential growth opportunities include sensitive estate regeneration and the development of excess highways land.
- South – to the south of the town centre is the hilltop Old Town, and then south from here is the A4361 linking to the Wichelstowe committed strategic allocation, the village of Wroughton (where there is a growth opportunity; discussed below) and the other identified Urban Regeneration Area outside of the town centre, namely Pipers Way (discussed below). Focusing on Wichelstowe, the eastern neighbourhood that has been completed is that which is best connected, with the remaining phases to be completed notably located between transport corridors, although there is a cycle route along a former railway that links this area to the A4361 and Old Town / town centre.
- West – the western part of Swindon is notably separated from surrounding areas by the River Ray corridor, rail / road corridors and industry. There is no direct road corridor linking to the town centre, but there is a desire to strengthen links to West Swindon District Centre. This is a more modern part of Swindon, such that there is less in the way of opportunity to regenerate areas with an ageing built environment, but attention does focus on the areas of amenity greenspace designed-in as part of developments, including along select road corridors.
- Northwest – north of the town centre there a series of older neighbourhoods dating from early / mid-20<sup>th</sup> Century including neighbourhoods that are amongst the 10% most deprived nationally and then, north of here, are Swindon’s most recent neighbourhoods, including Tadpole Garden Village. Radial connectivity between the northern neighbourhoods and the town centre is a major issue, with late 20<sup>th</sup> century new neighbourhoods having come forward either side of a major orbital route, namely A4198 (completed in 2001). However, there is an opportunity now to take a vision-led approach to mitigating and perhaps even remedying this situation, and the B4006/B4587 has been selected as a key corridor for growth and investment.

5.2.36. The above bullet points aim to demonstrate the logic of a new urban ‘movement’ focused strategy, and it is also important to add that this is key to net zero ambitions, given that development viability limits what can be achieved in terms of built environment decarbonisation. Swindon is a ‘car friendly’ town reflecting the proportion of the town that is 20<sup>th</sup> century in origin, which is a barrier to achieving a Net Zero Borough, but this only serves to emphasise the need to make every reasonable effort to maximise the rate of transport decarbonisation (plus there are many wider arguments in support of a planning focus on modal shift away from car dominance).

- 5.2.37. As discussed, the hope is that, in addition to urban supply can be currently identified with confidence, the current consultation will also stimulate interest from landowners such that additional supply can be identified prior to plan finalisation, whether in the form of discrete allocations or broad locations (where work post consultation can firm up delivery certainty, e.g. work on land assembly). Similarly, evidence generated through the current consultation will inform a final decision on a windfall assumption for the local plan (i.e. supply over-and-above that from allocated sites and broad locations), which will primarily mean determining an expected trend in respect of smaller urban sites. The Council has undertaken considerable work to explore urban capacity (looking at nearly 1,000 sites) and this will feed in alongside consultation responses.
- 5.2.38. Maximising urban supply will serve to minimise the need for greenfield urban expansion, which ties in with the 'vision', because greenfield development can have the effect of diverting investment from the urban area, and because some potential options for greenfield expansion are not well located in movement/transport terms. The need to take a 'brownfield first' approach is also very clear in national policy.
- 5.2.39. However, there is also a key need to balance ambition in respect of brownfield first / maximising urban supply with the key planning considerations around:
- Delivery risk – recognising that urban sites are very often complex or otherwise challenging to deliver, including because of existing uses and multiple landownerships, such that they are at risk of major delays and, in turn, impacts to the Borough's ability to deliver on its committed housing requirement (recalling that under-delivery leads to punitive measures, as has been the experience of the Borough for many years); and
  - Development viability – recognising that even where landowners are confident enough to bring forward a planning application, development viability often limits the potential to deliver / contribute to infrastructure, deliver affordable housing and deliver on wider policy objectives including built environment decarbonisation. Also, in addition to delivering affordable housing as a high proportion of market-led housing schemes there is an identified need for 78% of affordable for social rent, which is the tenure that requires greater subsidy by the developer or alternatively government grant.

### **Broad spatial strategy 2: Town centre rejuvenation and urban housing density**

- 5.2.40. The town centre vision is set out in detail within the Heart of Swindon Vision, and the current plan document summarises the strategy as follows (abridged):
- Swindon's Central Area will play a fundamental role in the... spatial strategy, with the physical potential to deliver up to 8,000 new homes and 6,000 new jobs, alongside a regenerated and vibrant main town centre environment...
  - Proposals for development within Swindon Central Area will be expected to positively contribute towards its transformation into a... thriving mixed-use urban heart that plays a regionally important commercial and leisure role and public transport interchange...
  - Key objectives are around
    - A strong and varied retail core (Regent Street, The Parade and Canal Walk)
    - New urban living (high-quality homes located above shops and around the retail core to establish a new mixed-use urban neighbourhood)
    - A centre for business (focused on Station Road and Fleming Way as part of a wider strategy to recentralise office uses).
    - Station Gateway (a regenerated station and greater permeability across the railway)
    - Leisure and learning (a new neighbourhood north of the railway, anchored by the Oasis and New College Swindon – North Star Campus)
    - Strengthen key routes (key routes are identified and are expected to create a consistent and high-quality active frontage and uses that support walking)
    - Knit in green infrastructure (including improving links to the wider network).
    - Respond positively to the historic environment (thoughtful reuse of heritage buildings and responding to the rich industrial history and other heritage assets)

- Proposals for major development are expected to identify and pursue opportunities to deliver coordinated schemes with neighbouring parcels and come forward through a comprehensive masterplan. Piecemeal development will be resisted in areas where wider regeneration potential has been identified.
- Proposals for development are expected to be of a scale and quantum that positively recognises the important transit hub role and high levels of accessibility.
- Tall buildings will be supported where they meet design and safety requirements.
- Car park development is supported where a lack of cumulative need is demonstrated.
- Where appropriate, the Council will seek improvements to connectivity and green infrastructure. This includes the provision or enhancement of, or contribution towards, improved walking routes, the historic street network, green links, cycling infrastructure.

5.2.41. As per element (1) of the spatial strategy, the broad strategy for the town centre and wider 'Central Area' is strongly supported and need not be called into question here. It is certainly not possible to pinpoint "reasonable alternatives" in respect of town centre strategy at the current time, including given that the Local Plan is just one element of a much wider strategy (the Heart of Swindon Vision does not reference the Local Plan).

5.2.42. However, and as per discussion above under spatial strategy element (1), it is important to state here that ambition for the town centre – in respect of addressing the major issues that exist and realising what is a huge opportunity – must be balanced against planning realities. In particular, key considerations are around:

- Housing delivery – whilst the Heart of Swindon commits to 8,000 homes in the Central Area, and this commitment is very important for developing investor confidence, it is important to reiterate that the Local Plan must commit to a housing requirement that is deliverable, avoiding a repeat of the issues experienced following the adopted Local Plan, most notably in respect of NEV (a commitment to deliver 8,000 homes by 2026). The current proposal is to commit to delivering 4,317 homes in the Central Area over the plan period, which is considered to be a suitable minimum figure associated with a sufficient degree of delivery confidence, but it is important to be clear that even delivering new homes in the Central Area at this rate would represent a step-change.
- Housing mix – any local plan must have a balanced portfolio of sites within its identified supply, both in terms of geographical location and type of site. This is both with a view to meeting the full range of needs, e.g. family housing, and supporting delivery by avoiding local market saturation and supporting a range of housebuilders.
- Affordable housing – it is not uncommon nationally for town centre developments to deliver nil affordable housing, even in parts of the country where development viability is much stronger than is the case for Swindon town centre. Where affordable housing cannot be delivered in line with policy it also follows that compromises may well need to be made in respect of wider objectives, e.g. around infrastructure, design, net zero.
- Community infrastructure – whilst it can be expected that a high proportion of new town centre residents will be younger people without school age children, it will nonetheless be the case that 8,000 homes will generate a need for new education and childcare capacity alongside wider services/facilities. Accessibility to schools with capacity is an existing issue in the town centre (including accounting for connectivity / permeability challenges) and given the space demands and locational requirements (e.g. with sufficient outdoor space) will be a key challenge moving forward.
- Office supply – there is an identified need for the Local Plan to deliver new high quality office floorspace, as discussed, and the emerging proposal is to meet needs predominantly in the Central Area. There is a strong element of risk here, on the basis of current evidence of lack of demand for office space in the town centre, with demand thought to be higher within office campuses on the main road network; however, this situation could change if momentum builds behind the town centre vision.

### Conclusion on broad spatial strategy

- 5.2.43. This section has introduced the “new strategic direction” which involves a major focus on maximising supply from the urban area in order to deliver on a vision for the town centre and key radial corridors through the wider urban area.
- 5.2.44. This new strategic direction is strongly supported and need not be questioned *in and of itself* for the purposes of defining RA growth scenarios at the current time (matters could be revisited subsequent to the current consultation, e.g. town centre alternatives).
- 5.2.45. However, it is important to question the level of supply that is assumed on the basis of the urban focused strategy, particularly in terms of supply over the crucially important early years of the plan period (the plan must be able to demonstrate a five year housing land supply at the point of plan adoption and then be able to maintain this over the early years of the plan ahead of a local plan review, which can then boost supply) but also over the plan period as a whole. Predicting urban supply is far from an exact science, and so there is a need to make suitably cautious/conservative assumptions, with a view to avoiding a situation whereby unforeseen delivery issues lead to a situation whereby the Borough cannot deliver on its committed housing requirement. As such, the key question is what level of urban supply can and should be assumed on the basis of conservative assumptions and, in turn, what is the residual quantum of supply that must be identified elsewhere in order to meet development needs / requirements. In short there is a significant residual need for new non-urban supply, and, in turn, there is a need to also carefully consider how this might be achieved spatially in line with a strategy. This is a matter that is a focus of further discussion below, within Section 5.4.

### 5.3. Site options

- 5.3.1. This section considers the individual site options that are the building blocks for growth scenarios. The aim is not to present an appraisal of site options, but rather to signpost to officer led workstreams that have appraised/assessed site options and which have led to a shortlist of site options to consider further in Section 5.4.
- 5.3.2. There are **two key workstreams** examining site options, both led by SBC Officers: the Strategic Land Availability Assessment (SLAA); and the Urban Capacity Study (UCS)
- 5.3.3. Beginning with the **SLAA**, this is an iterative process for assessing known sites that are potentially available for development and for each one reaches a conclusion on whether the site is ‘deliverable’ (able to deliver within 5 years) or ‘developable’ (within the plan period) after having determined that the site is both:
- Available and achievable – meaning there is a reasonable prospect of development accounting for financial viability and assuming that the site will deliver on standard policy asks. This is not always clear cut, particularly where the land is currently in a profitable use and recognising the costs involved with seeking planning permission.
  - Suitable – the aim is to reach a high level conclusion in light of a basic set of standard criteria. There is a clear recognition that sites deemed suitable through the SLAA will not necessarily be suitable for allocation through the Local Plan in light of more detailed analysis including consideration of the effects of developing the site in combination with others (at a range of scales), as discussed in Sections 5.4 and 5.5.
- 5.3.4. An initial focus of the SLAA was sites submitted to the Council for consideration as potential local plan allocations, which primarily means sites submitted by landowners (looking back over a number of years, over which time there have been several ‘calls for sites’ as well as local plan consultations) but also sites submitted by SBC teams including those with a focus on the Council’s assets and regeneration objectives.
- 5.3.5. However, over recent months and years there has also been a focus on proactively identifying potential sites and broad locations for allocation through the **UCS**. This has been a major undertaking, essentially because of a need to investigate land ownership before reaching a conclusion on whether the land could potentially be available for development / redevelopment / intensification in the plan period (to deliver new supply).

- 5.3.6. For many of the UCS sites the conclusion reached is that the land is unavailable or there is insufficient confidence regarding availability. However, for a range of sites there is sufficient confidence regarding availability, and, in turn, these sites can be considered through the SLAA and, in turn, considered for allocation in the Local Plan.
- 5.3.7. With regards to the SLAA analysis, attention focuses on the criteria employed when giving consideration to development suitability in respect of **greenfield site options** and, in this regard, it is important to note that in addition to standard distance/intersect analysis using GIS (e.g. intersect with a flood zone) qualitative appraisal workstreams were employed focusing on historic environment, landscape and biodiversity constraint. Ultimately, the methodology employed is considered to be robust / proportionate, but there will be the potential for further targeted work following the current consultation.
- 5.3.8. The **outcome of the SLAA** is that: many site options are ruled out as not developable; others are developable in SLAA terms but perform relatively poorly such that there is no realistic potential for allocation given the combined capacity of preferable sites; and the remaining sites warrant further consideration.
- 5.3.9. Of this latter category, there is a clear distinction between: **A)** urban sites that are strongly supported, but where further work is often needed to confirm supply etc; **B)** greenfield sites that are strongly supported; and **C)** greenfield sites that must be considered at the current time, but where the strategic case given uncertainties regarding supply from the urban area (as discussed above) but where the strategic case for allocation will hopefully reduce following the current consultation on the basis of increased certainty regarding accounting for a high level of urban supply.
- 5.3.10. Finally, there is a need to consider the three **existing strategic allocations** that are not yet complete, namely New Eastern Villages (NEV), Kingsdown and Wichelstowe. In short, whilst all clearly warrant being taken forward into the new Local Plan, as more-or-less a first port of call in respect of greenfield housing land supply to compliment the urban focused strategy introduced in Section 5.2, there are important questions/choices in respect of what is supported at these sites. Taking the sites in turn:
- New Eastern Villages (NEV) – whilst the adopted Local Plan envisaged 8,000 homes in total, all to be delivered in the plan period which ends in 2026, the new proposal is to support 10,000 homes in total including 8,000 in the plan period, i.e. by 2043.  
The proposal to support additional homes is the outcome of much detailed work over many years and aims to be boost viability and ultimately support delivery the established vision, recognising that this is a very complicated site given flood risk zones as a constraint to masterplanning, plus a need for equalisation across numerous landowners. There is no potential to call this approach into question, i.e. suggest revisiting the NEV vision (subject to consultation). However, it is important to state that delivery of 8,000 homes in the plan period is associated with a degree of uncertainty.
  - Kingsdown – there is now a resolution to grant planning permission for the main site; however, there are some outstanding questions regarding associated / nearby smaller site options, with a view to ensuring comprehensive growth and maximising benefits for the Broad Blunsdon area (i.e. avoiding further sub-optimal piecemeal growth).
  - Wichelstowe – remaining parcels have been permitted in the past, but the permissions have now lapsed. The current proposal is to deliver a further 1,620 homes in the plan period and this reflects a view that land proposed for employment land in the adopted Local Plan can now be better brought forward as residential.
- 5.3.11. In **conclusion**, officer-led workstreams have examined site options in a way that is judged to be suitably robust and proportionate. Shortlisted options are explored further below in Section 5.4, where the aim is to move beyond considering sites in isolation to consider how they might be brought forward in combination in order to deliver a strategy.

## 5.4. Top down meets bottom up

### Introduction

- 5.4.1. Discussion has so far focused on A) 'top down' consideration of strategic factors (growth quantum and broad spatial strategy); and B) 'bottom-up' consideration of site options.
- 5.4.2. The next step is to bring these factors together in order to identify site options and combinations of site options that should be taken forward to the RA growth scenarios.
- 5.4.3. This is an inherently challenging aspect of local plan-making, and so it is important to break the task down. In this instance the task is broken down by focusing on:
  - 1) Sub-areas (housing focus)
  - 2) Employment land needs
  - 3) GTSS accommodation needs

### Methodology

- 5.4.4. Focusing on (1), the aim is to draw together the 'top down' and 'bottom up' inputs discussed above before concluding on combinations of supply options – henceforth sub-area growth scenarios – to take forward to Section 5.5, where the aim is to combine these to form borough-wide RA growth scenarios for appraisal and consultation.
- 5.4.5. With regards to employment land and GTSS accommodation the situation is more straightforward as there is simply a need to reach a conclusion on RA growth scenarios.
- 5.4.6. The aim here is not to present a formal appraisal, but rather to contribute to “an outline of the reasons for selecting” the RA growth scenarios ultimately defined in Section 5.5. Accordingly, the discussions are systematic only up to a point, with extensive application of discretion and planning judgment. The aim is not to discuss all site options to the same level of detail, but rather to focus attention on those *judged to be more marginal*, i.e. where the question of allocation is more finely balanced.
- 5.4.7. As such, site options are discussed in broad order of performance in light of: Section 5.2 (which allows for an understanding of broadly how much development is needed borough-wide and how it should/might be distributed); and Section 5.3 (which signposts to the officer-led workstreams differentiating the merits of site options).
- 5.4.8. To summarise Section 5.2: A) there is a clear need to set the housing requirement at 24,100 homes in total (2023-43) as a minimum and, whatever requirement is set, there will be a need for a healthy supply buffer to account for delivery risks; and B) there is an existing supply of 13,699 homes from completions and commitments; such that C) there is a residual need to identify supply of at least ~10,400 homes plus an additional buffer.

### Sub-areas

- 5.4.9. The following sub-areas are discussed in turn.
  - Swindon town centre
  - The wider urban area
  - Northern urban edge
  - Northeast urban edge
  - Eastern urban edge
  - Southern urban edge
  - Western urban edge
  - The rural area

## Swindon town centre

- 5.4.10. As discussed, there is support for the high ambition strategy but a need to exercise caution regarding assumed supply.
- 5.4.11. The emerging proposed allocations are as follows:
- Land to the north of the Station (s0564) – **1,369 homes** (10.94ha)
  - Brunel Quarter (s544a) – **1,016 homes** + offices + retail (XX ha)
  - North Star (Oasis Leisure Centre) (s0099c) – **743 homes** + swimming pool (6 ha)
  - Swindon Station (s0433) – **438 homes** + offices (4.98 ha)
  - Regent Place and Princes Street Car Park (s0519) – **262 homes** + community uses retain (Wyvern building) (1.7 ha)
  - The Parade (excluding old Debenhams building) (s0508) – **245 homes** + retail (2 ha)
  - Civic Campus (UCS.0959) – **115 homes** + civic + museum (2.3 ha)
  - Bristol Street Car Park (s0025) – **102 homes** (0.9 ha)
  - Spring Gardens Car Park (UCS.0960) – **60 homes** (0.3 ha)
  - Land at Holbrook Way (UCS.0622) – **8 homes** (0.07 ha)
- 5.4.12. There is limited potential to scrutinise this assumed supply here (as part of a process to define RA growth scenarios), but it will be important to do following the current consultation, drawing upon consultation responses received from landowners, partner organisations and stakeholders, and drawing upon latest technical evidence not least in respect of infrastructure capacity issues and opportunities (work is ongoing). Clearly evidence of external funding sources will be important, e.g. the Council recently reported on funding for early work on regeneration of the train station area.
- 5.4.13. However, it is important to highlight Polaris House, within Land north of the Station, which was identified through the Urban Capacity Study rather on be the basis of a submission received from the landowner. This is an important office campus discussed within the ELR as home to “science and innovation head offices” that is “in good condition with no obvious vacancies” and which is also highlighted within the Heart of Swindon Vision, which highlights the importance of a number of the knowledge sector businesses/organisations within Polaris House to the town centre. On the other hand, the proposed housing supply trajectory is clear that any redevelopment would occur later in the plan period, such that there would be ample opportunity for relocation.
- 5.4.14. Also, with regards to North Star (Oasis Leisure Centre), it has recently had planning permission for a snow dome, but residential will support delivery of this site to include a new swimming pool, recognising that the leisure centre has been closed since 2020.
- 5.4.15. Finally, with regards to delivery challenges and associated risks, it is important to note that the main sites are in close proximity, most notably ‘Land north of the Station’ and ‘North Star (Oasis Leisure Centre)’, which are adjacent. A new urban community here is central to the Local Plan spatial strategy (as discussed in Section 5.2), but there is a need for further work to firm up delivery assumptions, including from a construction phasing perspective, and carparking capacity will also require further investigation.
- 5.4.16. In **conclusion**, there is one reasonable sub-area growth scenario, namely the preferred scenario involving allocations for **4,358 homes** in the plan period. There is limited basis to question proposed allocations, but there is a need to highlight delivery risk. There are no ‘omission sites’ to highlight, although it is important to note a large site located to the north of Oasis Leisure Centre that has been vacant for 15+ years and is proposed for a data centre, but which might alternatively be considered for residential.

## The wider urban area

- 5.4.17. The proposal is A) to allocate two Urban Regeneration Areas, namely Marlowe Avenue and Pipers Way; B) to additionally allocate five non-strategic sites; and C) to designate select transport corridors (including local centres along these) as Sustainable Growth Areas with a view to encouraging landowners to submit sites through the current consultation and also with a view to supporting windfall development.
- 5.4.18. Beginning with Marlowe Avenue (s0542t), it has been introduced above and is strongly supported. A challenge relates to delivering an overall vision recognising that parts of the site have recently been redeveloped, elsewhere there is planning permission and elsewhere applications are well-progressed. The current proposal is to account for **976 homes** supply *over-and-above permissions* alongside policy requirements around re-providing industrial land and contributing to a bus transit corridor.
- 5.4.19. The Pipers Way Urban Regeneration Area is then a collection of three sites at the southern edge of the town, comprising two existing employment sites, both identified by the ELR (2025) as having potential to be redeveloped for an alternative use, plus a former park and ride that closed in 2007. With regards to the employment sites, the ELR finds:
- Wakefield House (**228 homes**; s0501b) – is currently vacant having been a former headquarters and is in a run-down state. Its location at the edge of the New Town means that redevelopment for offices would not support town centre regeneration.
  - Pipers Way (**276 homes**; UCS.0022) – “... Intel is due to vacate imminently. The building has low market attractiveness... its reuse for offices would again not support town centre redevelopment but potentially alternative accommodation for Intel would.”
- 5.4.20. With regards to the former Park and Ride (**340 homes**; s0297), a point to note is its location on the A4361 a short distance to the north of Wroughton, which is discussed below as a proposed strategic growth location, such that the potential to contribute to targeted strategic enhancements to the transport corridor can be envisaged.
- 5.4.21. Finally, with regards to the five non-strategic allocations, the proposal is for these five sites in combination to deliver **292 homes**. Two sites are of note:
- Newburn Sidings (203 homes; s0097) – is well-located close to the town centre and two adjacent A-roads, but railway sidings may be challenging and costly to deliver.
  - “West of Shaw Village Centre Residential (6 homes; s0532) is notable as a site comprising underused amenity greenspace in the urban area.
- 5.4.22. In **conclusion**, there is one reasonable sub-area growth scenario, namely the preferred scenario involving allocations for **2,112 homes**. As discussed, there is some delivery risk although, on the other hand, there is an aspiration to boost supply from the wider urban area following the current consultation in light of new site submissions.

## Northern urban edge

- 5.4.23. Key context that has already been introduced above is around: 1) recently completed Tadpole Garden Village; 2) a pending planning application for 410 homes;<sup>8</sup> and 3) concerns regarding further expansion in this area particularly in transport terms.
- 5.4.24. Despite a lack of complete alignment with the vision-led transport strategy described above, the emerging preferred approach is to allocate three closely linked sites jointly as North Tadpole Strategic Growth Location, for a total of **513 homes**, comprising:
- Lower Widhill Farm (Hallam option 2) (s0030c) – 352 homes (29 ha)
  - Land off Tadpole Farm (SBC) (s0528) – 151 homes (10 ha).
  - Tadpole Triangle (SBC) (s0106b) – 10 homes (0.4 ha)

<sup>8</sup> This site would extend the recently delivered Abbey Farm site (350 homes) further to the northwest, towards Tadpole Garden Village. It has been called ‘Tadpole 2’, but ‘Northwest of Blunsdon St Andrews’ is considered a more accurate description.



- 5.4.25. These sites benefit strongly from a location adjacent to new strategic infrastructure delivered alongside Tadpole Garden Village, including a secondary school, a primary school and a health centre. Also, a benefit is limited environmental sensitivity including in landscape terms, as this is low lying land in proximity to the A419. However, these sites do not link very well to Tadpole Garden Village to the west given an intervening solar farm, nor to Blunsdon St Andrew to the south given an intervening hill.

N.B. another consideration is that there would be a requirement to deliver Suitable Alternative Natural Greenspace (SANG) to mitigate recreational impacts on North Meadow SAC at Cricklade. This imposes an additional cost on the developers with implications for development viability / ability to deliver on wider policy objectives, but the sites should be well-placed to deliver SANG given the land that is available.

- 5.4.26. Overall, these sites do warrant ongoing scrutiny, including with a view to ensuring a comprehensive approach to growth that leverages maximum planning gain and considers the northern expansion of Swindon with a strategic / long term perspective. There is a need to recognise not only challenges around linking to the town centre to the south, but also sensitivities to the north namely the River Ray and the River Thames.
- 5.4.27. However, on balance there is considered to be a strong case for allocation given the strategic context in respect of housing needs and delivery challenges / risks.
- 5.4.28. The next question is whether there are any omission sites that potentially warrant detailed scrutiny through the appraisal of RA growth scenarios, and in this regard, there is a clear need to consider NW Blunsdon St Andrews where, as discussed, there is a pending planning application for 410 homes. The proposal would deliver significant green infrastructure improved transport links, but there a key constraint is topography (the aforementioned hill) and associated landscape sensitivity. Specifically, whilst the adjacent recent Abbey Farm scheme sought to avoiding 'spilling over' the crest of a hill, the effect of further growth would be take Blunsdon St Andrews / the Swindon urban edge part of the way down the hill towards Tadpole Garden Village. Furthermore, whilst parts of the lower slopes of the hill are proposed for green infrastructure, other parts fall outside of the site redline boundary, such that the potential for these areas to come under pressure for development in due course can certainly be envisaged.
- 5.4.29. Overall, there is considered to be an important omission site that warrants being taken forward to the RA growth scenarios for further detailed consideration. However, it is difficult to know what assumptions to make regarding what would be delivered. On the one hand there is a need to give weight to the work underpinning the current planning application. However, on the other hand, site specific proposals are subject to change and there appears to be a clear need to ensure a focus on securing comprehensive growth in this area, i.e. with a view to avoiding sub-optimal piecemeal growth.
- 5.4.30. In **conclusion**, there are two reasonable sub-area growth scenarios, namely: 1) the preferred scenario involving 'North Tadpole' for **513 homes**; and 2) additional growth NW of Blunsdon St Andrews for ~500 homes leading to a total supply of **1,013 homes**.

### Northeast urban edge

- 5.4.31. As discussed, the existing Kingsdown strategic allocation has a resolution to grant outline permission for 1,552 homes and this supply is counted as 'committed'. The question is whether there is a case for additional allocations to support comprehensive growth and noting the extent of recent sub-optimal piecemeal growth in the area.
- 5.4.32. In this context, the current proposal is to additionally allocate seven sites for a total of **515 homes**, namely:
- Land at Sams Lane (southern part) (Turley) (s0050b) – 115 homes (5.1 ha)
  - Land at Turnpike Road (s0036) – 93 homes (4.1 ha)
  - South of Highworth Road (s0062) – 89 homes (5.9 ha)
  - North of Kingsdown Lane (s0375) – 77 homes (3.4 ha)

- Kingsdown Nurseries (Turleys) (s0380) – 64 homes (2.9 ha)
- Land at 12 Turnpike Road (Marrons / Bellway Homes) – 48 homes (2.1 ha)
- Stubbs Hill Farm (part) (s0536) – 29 homes (1.9 ha)

5.4.33. These sites broadly fall into three clusters:

- Sites on the edge of Kingsdown – namely North of Kingsdown Lane, Kingsdown Nurseries and Stubbs Hill Farm (170 homes in total). These sites all include an element of existing built form onsite, and the potential align reasonably well with the Kingsdown masterplan can be envisaged. Specifically, the Kingsdown Masterplan involves two ‘villages’ on raised land at the northern and southern extents of the allocation, separated by a valley / stream corridor proposed for parkland.
- Sites close to A419/A4311/B4019 junction – namely Land at Turnpike Road, South of Highworth Road and Land at 12 Turnpike Road (230 homes in total). These sites are well located in transport terms and will help to link Broad Blunsdon to the southern Kingsdown ‘village’. However, there is a need to question whether remaining land between Broad Blunsdon and Kingsdown will come under development pressure in the near future, notwithstanding: A) the fact that this land is designated as a “Non-coalescence Area”; B) the green infrastructure role of this land linking to the aforementioned central Kingsdown parkland (including noting a public footpath); C) the land has not been promoted as available; and D) a recent major water pipeline.
- Land at Sams Lane (115 homes) – is located on the edge of Broad Blunsdon and would extend the village to the east. There is a pending planning application, and it would represent phase two of a recently delivered scheme adjacent to the north, with it clearly being unfortunate that the two sites could not be delivered together, with a view to a comprehensive scheme and with a view to maximising benefits.

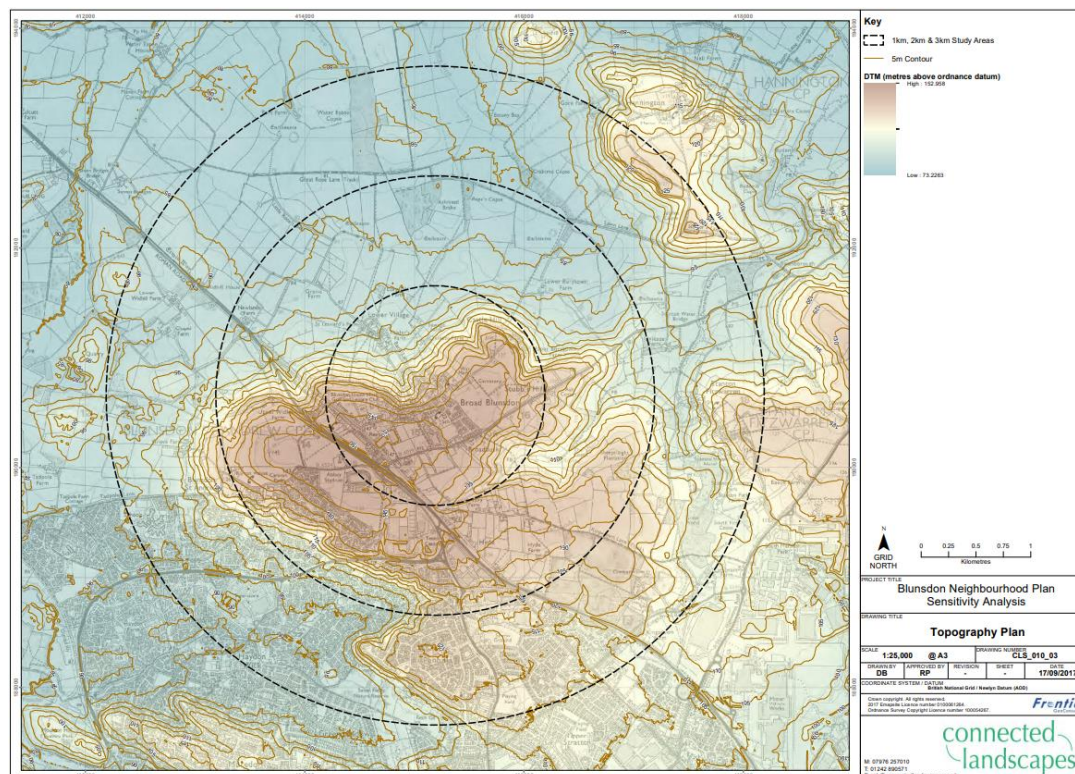
5.4.34. Overall, these sites are quite strongly supported, given the strategic context. It will be important to ensure a strategic approach to growth in this area that acknowledges the need to consider growth at Broad Blunsdon and Kingsdown with a strategic perspective.

5.4.35. The next question is whether there are any omission sites that potentially warrant detailed scrutiny through the appraisal of RA growth scenarios, and in this regard, there are numerous sites that are available and being actively promoted to the Council. However, there is considered to be a weak strategic case for further growth through the current Local Plan, given the extent of committed growth alongside growth from the new proposed allocations discussed above (also noting recent growth). Sites include:

- Extensions to Kingsdown – specifically to the north and/or northeast. There is a clear need to deliver on the established masterplan, which is carefully considered including from a perspective of respecting the Mid Vale Ridge topography – see Figure 5.4. There is a need to consider the risk of ‘sprawl’ along the B4019 to Highworth.
- A further extension east of Broad Blunsdon – there is a pending planning application for land to the east of the Sams Lane site discussed above. On the one hand this could take Broad Blunsdon to a logical extent, in that it would complete the expansion of the village across the raised land with which it is characteristically associated and would ensure a rounded settlement edge if Broad Blunsdon were to be considered a single settlement in conjunction with Kingsdown. However, on the other hand, there are clear historic environment and landscape sensitivities. Specifically, at the northern extent of this site is Burytown Lane, which an important walking route linking the village conservation area to a Hillfort Scheduled monument, from which there are extensive and important views north across the vale towards the Thames. Views are discussed in the Neighbourhood Plan, and a footpath through the site is also noted.
- North of Broad Blunsdon – most of the land north of the village is available, plus a very large parcel of land between Broad Blunsdon and Highworth is available for a possible new settlement. However, this area is poorly connected in transport terms, and there are clear sensitivities given: A) the Broad Blunsdon conservation area and the scheduled monument; and B) the relationship between Broad Blunsdon and Highworth as raised villages of the Mid Vale Ridge and the Vale landscape to the north.

- 5.4.36. In **conclusion**, there is one reasonable sub-area growth scenario, namely the preferred scenario involving non-permitted allocations for **515 homes**. Moving forward it will be important to ensure a strategic approach to growth in this area with a long-term perspective in order to avoid issues and maximise benefits / leverage planning gain.

*Figure 5.5: Topography in the Blunsdon area sourced from the Blunsdon East NP evidence base; N.B. does not show recent development inc. Tadpole GV & Abbey Farm*



## Eastern urban edge

- 5.4.37. This is the location of New Eastern Villages (NEV), which has been discussed above. In short, there is support for the new proposed approach of 8,000 homes at NEV in the plan period and 10,000 homes in total, in support of delivery and achievement of the vision. Three components of NEV are not counted within the supply figure for sites with planning permission reported above, which together have capacity to deliver **1,878 homes**. Also, three adjacent new sites are proposed for allocation at the current time, which do not appear to give rise to any significant concerns (and could help to deliver a comprehensive NEV). The combined capacity of these sites is **144 homes**.<sup>9</sup>
- 5.4.38. As discussed, in the long term the possibility of further growth in this area could be an option to consider, e.g. with a view to transformational new transport infrastructure and possibly even to include a new train station and recognising the importance of links to Oxford. However, the current focus must be on delivering NEV, and further growth could be something to consider through a future sub-regional Spatial Development Strategy (SDS) following designation of a Strategic Authority to cover Swindon which, at the time of writing, could either link Swindon to the Thames Valley or to the West of England. With regards to a station, this would ideally be located centrally within NEV where the line is on level ground (rather than on an embankment or in a cutting) but is very difficult to see how this could now be delivered given the established NEV masterplan.

<sup>9</sup> Thornhill Industrial Estate (s0111) Crown; Timber Site (s0112); Land within Meadow Cottage (s0523);

- 5.4.39. Other considerations are: A) the current northern extent of NEV is Nightingale Wood (not an ancient woodland, but designated public access land) and the River Cole corridor, with this area important from a green/blue infrastructure perspective; B) at the northern extent of South Marston is a Grade I listed church; and C) there is a need to carefully consider expansion of Swindon across the Vale including with a view to avoiding the risk of coalescence with Shrivenham and/or Highworth and also given views from the North Wessex Downs National Landscape including from the Ridgeway.
- 5.4.40. In **conclusion**, there is one reasonable sub-area growth scenario, namely the preferred scenario involving non-permitted allocations for **2,022 homes**. There is a clear need to acknowledge ongoing delivery risk in respect of NEV, but detailed work is ongoing to firm-up understanding in respect of the delivery trajectory and associated risks.

### Southern urban edge

- 5.4.41. Beginning with Wichelstowe, as discussed this is supported to deliver **1,620 homes** over-and above new homes that have been completed or which have permission.
- 5.4.42. There are no further urban extension options of note in this area (N.B. the Pipers Way Urban Regeneration Area is at the southern extent of the urban area; discussed above).
- 5.4.43. There is a need to carefully consider the southern urban edge to the south of the M4, but this is a focus of discussion below, under the 'Rural area' heading.
- 5.4.44. In **conclusion**, there is one reasonable sub-area growth scenario, namely the preferred scenario involving allocations for **1,620 homes**.

### West Swindon

- 5.4.45. This area has already been introduced above as a broad direction of growth that performs relatively poorly. Furthermore, on the basis of the discussion above there are ample supply options associated with preferable directions of growth. This being the case, there is limited case for exploring allocation options in detail.
- 5.4.46. However, briefly, broad options involve: A) strategic cross-border growth northwest of M4 J16, likely employment-led; B) an extension to a recently delivered scheme at Grange Park (which would encroach upon Lydiard Park Registered Park and Garden); C) a significant extension to Nine Elms, which would erode the gap to Lydiard Millicent (albeit there is an intervening stream corridor); D) an extension to Roughmoor / Common Platt that would not relate well to the settlement edge and appears to perform particularly poorly in transport terms; and E) strategic growth to the northwest (north of Maldon Hill Country Park), where the River Ray corridor is a clear constraint (including noting Haydon Meadow SSSI which is in 'unfavourable declining' condition), albeit transport connectivity here is likely stronger than is the case for land north of Swindon.
- 5.4.47. In **conclusion**, there is one reasonable sub-area growth scenario, namely the preferred scenario involving **nil allocations**. It is recognised that there is a need for ongoing discussion with Wiltshire Council regarding long-term growth strategy.

### The rural area

- 5.4.48. The discussion here starts with the villages closely linked to the southern edge of Swindon, before going on to consider Highworth, which is a market town but less well linked to Swindon including the town centre.
- 5.4.49. Beginning with **Wroughton**, the preferred approach is to allocate four closely linked sites at the northern extent of the village as a Strategic Growth Location for a total of **1,031 homes**, namely: Berkley (western side) (s0540b; 365 homes; 16 ha); Akers Land (western side) (s0427b; 300 homes; 13 ha); Land at North Wroughton (s0114; 175 homes; 11.7 ha); and Land east of Swindon Road (South) (s0072; 191 homes; 9 ha).

- 5.4.50. A key point to note is that the historic core of the village is at its southern extent, at the foot of the North Wessex Downs scarp slope, and then the village has expanded north towards Swindon. There had then been limited growth over a number of years, but recently a series of sites have been permitted at appeal with weight having been given to the Borough's lack of a five year housing land supply.
- 5.4.51. The other key point is that land to the north of Wroughton is well-linked to Swindon via the A4361 and, as discussed, the current proposed approach is to focus growth along this corridor with a view to supporting infrastructure and bus service enhancements. Furthermore, the village benefits from a secondary school and sixth form.
- 5.4.52. Looking across the four sites, Land at North Wroughton is an allocation in the made Wroughton Neighbourhood Plan for 120 homes, but the proposal is now to support 175 homes. There is a historic landfill site covering the majority of this area, and the proposal through recent planning applications has been to deliver a cricket pitch here. The remaining three sites are then located to the east of the A4361 and have good potential to come together in a coordinated way in order to deliver a comprehensive scheme that delivers benefits to the village. However, precisely what can be achieved requires further investigation, including through the current consultation, and it will be important to ensure suitably comprehensive growth with a long term perspective, recognising that wider land parcels in this area are available (although there are important constraints to growth, namely the NL and Burderop Wood SSSI).
- 5.4.53. Aside from Wroughton, to the south of Swindon there is a need to briefly consider:
- **Land in proximity to M4 J16** – this is council owned land and the ELR suggests the possibility of exploring strategic employment land here (and/or elsewhere in proximity to the junction), working in collaboration with Wiltshire Council, and there would be a benefit to delivering new employment land in close proximity to Wichelstowe. Alternatively this land could feasibly be considered for a new settlement, but the strategic case is not strong, given: A) the number of homes needed from greenfield sites through the Local Plan; B) the need to allocate sites with strong delivery credentials; C) lack of clear alignment with the vision-led transport strategy; and D) capacity issues at M4 J16 and no clear growth-related solution.
  - **Chisledon** – is located within the National Landscape but there are potentially growth options that might be given further consideration, including with a view to delivering targeted benefits to the village and generally maintaining village vitality, recognising that there has been very limited new housing over recent years and decades (the population of the village has actually declined slightly over recent decades). There is a pending planning application for 42 homes to the northwest of the village, but it is not clear that this is the preferable direction for expansion, given the nearby scarp slope (also noting adjacent public rights of way) and the adjacent conservation area.
  - **Wanborough** – is notably constrained by the setting of the National Landscape. Again there could be an argument for growth in support of village vitality (there has been only limited recent growth, although proximity of NEV is important to note) but only two modest sized sites have been submitted as available, which would deliver limited benefits to the village beyond new market and affordable housing. A final point to note is that a planning application for a science park was refused by the Council and then at appeal in 2022 (discussed here). Regardless of this specific proposed scheme, there could be a case for considering science / R&D park options in proximity to M4 J15, assuming a 'landscape led' scheme to minimise National Landscape impacts.
- 5.4.54. Finally, with regards to Highworth, the preferred approach is to allocate one site for **53 homes** (2.3 ha), namely Land at Pentylands Lane / Crane Furlong (s0042). This is an allocation in the emerging Neighbourhood Plan (2024) and gives rise to few concerns.
- 5.4.55. This is a reasonable low growth scenario, given that the discussion above has served to highlight ample supply options to enable a Local Plan housing requirement set at LHN.

- 5.4.56. However, and as discussed, there is also a need to remain open to the possibility of higher growth and, whatever the housing requirement, there is a need to identify a total supply comfortably above the requirement, i.e. a healthy 'supply buffer'.
- 5.4.57. This being the case, there *is* a need to consider the possibility additional growth at Highworth as the Borough's second largest settlement.
- 5.4.58. Highworth has a good local offer but is not as well-connected to Swindon town centre as is the case for Wroughton (albeit there is a good bus service and key employment areas are in relative proximity). Also, Highworth is associated with a characteristic raised location on the Mid Vale Ridge (albeit eroded by late 20<sup>th</sup> century expansion downhill onto and across the Vale), which creates a challenge in respect of considering potential directions for expansion. Related to this, the conservation area close to the southern extent of the town includes a high density of listed buildings (including one Grade I and five Grade II\*) and there is a network of scheduled monuments to the east.
- 5.4.59. Given available sites there appear to be the following broad options for growth:
- West –the potential for good containment can be envisaged, but there are clear landscape and historic environment sensitivities given the Hampton Conservation Area and with this land the edge of the Ridge (also noting an important footpath).
  - North – land is available that could deliver strategic growth, potentially to include new infrastructure to the benefit of the town, and a previous version of the Local Plan proposed a 250 home site (there is a pending planning application). However, the town centre is relatively distant (also the secondary school), this part of the town is least well connected to Swindon, and there would be a risk of 'sprawl' across the Vale.  
  
A supermarket was recently delivered that could feasibly form part of a new local centre, although there is also an adopted Local Plan industrial land allocation.
  - East – this is potentially a preferable location for growth in containment and access terms, but not necessarily in transport terms given a risk of traffic through the historic town centre. A clear constraint relates to the adjacent scheduled monuments.
  - Southeast – there is recent and committed piecemeal growth here, including a site permitted for 250 homes in the knowledge that the Borough did not have a 5YHLS. Land here benefits from close proximity to the secondary school, but this is the road corridor to Watchfield and Shrivenham rather than to Swindon (there is no clear link road option). It is not clear that there is any further significant growth opportunity.
  - Southwest – the municipal golf course here closed in 2019. This is Council owned land and is not currently available for development. This sector of the town's edge benefits from proximity to the town centre and secondary school and also relatively good connectivity to Swindon. However, there is a concern regarding 'sprawl' along the A361, proximity to the conservation area is a constraint and the site is currently available to access by members of the public.
- 5.4.60. Overall, given the strategic context it is considered important to consider the possibility of one or more additional allocations in addition to the aforementioned preferred site for 53 homes. However, it is not possible to pinpoint what additional growth might involve.
- 5.4.61. As such, and on balance, a higher growth scenario is taken forward that assumes between 500 homes (as a round number) and 700 homes (as a scale of growth where delivery of a new primary school might be possible) but no specific sites are identified.
- 5.4.62. In **conclusion**, this 'rural' sub-area can be broken down further as follows:
- **Wroughton** – one reasonable sub-area growth scenario, namely the preferred scenario involving strategic growth to deliver **1,031 homes**. There is a clear strategic case for growth, but more work is required in order to explore what can be achieved.
  - **Highworth** – two reasonable scenarios, namely: 1) the preferred scenario involving one non-strategic allocation for **53 homes**; and 2) one or more additional allocations at Highworth to deliver ~600 homes (as a mid-point) leading to **~650 homes** in total.

## Employment land

- 5.4.63. As discussed in Section 5.2, in headline quantitative terms there is a need for new office floorspace but not new industrial land but sitting beneath the headline figures are a range of detailed ('qualitative') matters for ongoing consideration.
- 5.4.64. In respect of new industrial land, the proposal to rely on the intensification of existing sites is broadly supported, albeit there remains a need to remain open to allocations.
- 5.4.65. In respect of office floorspace the situation is more complicated. On the one hand the proposal is to support residential led redevelopment of select office sites leading to a loss of floorspace over-and-above that which factored into the ELR. Also, the new supply that factored into the ELR includes sites with poor transport connectivity, such that Council support for new office floorspace on these sites is not clearcut. However, on the other hand, the proposals is to focus on the town centre meaning floorspace delivered on relatively small sites, thereby reducing the need for land in comparison to the ELR calculations. There is also a need to factor-in timing of delivery and delivery risk in the town centre.
- 5.4.66. Overall, whilst there will be a clear need to revisit the matter of employment land supply subsequent to the current consultation, to include considering the possibility of new greenfield allocations (both in respect of industrial land and office floorspace), at the current time there are no headline omission site options to explore in detail. One thing to highlight is the possibility of a research & development park close to an M4 junction.
- 5.4.67. There is support for testing the preferred strategy through the consultation and then considering potential revisions to the strategy in light of consultation responses received.

## Gypsy, Traveller and Travelling Showpeople accommodation needs

- 5.4.68. As discussed in Section 5.2, there is a need for 35 new pitches and 19 Travelling Showperson plots, primarily over the early years of the plan period.
- 5.4.69. Beginning with Gypsy and Traveller pitches, the proposal is to allocate: Chiseldon Firs (public site) for 10 pitches, which is on the A346 and operates as a transit site; Land at Quebec Road (private site for 10 pitches), which is nearby to Chiseldon Firs and where there is a need to confirm the previous use; and Little Rose Lane (private site) for 10 pitches, which is in a rural area and affected by surface water flood risk.
- 5.4.70. Overall this is considered to be a reasonably positive strategy, given the context discussed in Section 5.2. There are not known to be any omission sites to explore at the current time, but there will be a need to revisit the strategy following consultation.
- 5.4.71. With regards to Travelling Showperson plots there are no identified allocations at the current time, which is clearly a significant issue. However, there not known to be any site options reasonably in contention for allocation, and so the hope is that new sites will be submitted through the current consultation. The current site (from where some or much of the need presumably arises) is located quite centrally within the urban area.

## Conclusion on scenarios to take forward

- 5.4.72. This section has considered categories of supply – mostly sub-areas – in turn and considered whether the approach to growth should be taken forward to the RA growth scenarios (Section 5.5) as a 'constant' or a 'variable'. In conclusion:
- **Most sub-areas** – the conclusion is that the approach to growth can be taken forward as a 'constant', but in some cases this conclusion is reached 'on balance'. Perhaps most notably, this is the case for the northeast urban edge, where there is a need to ensure a focus on comprehensive growth. Also, for other sub-areas, whilst there is little basis for questioning the proposed allocations, there is an acknowledgement that the assumed supply warrants scrutiny to ensure a suitably conservative approach.



- **Northern urban edge and Highworth** – the approach to growth should be explored further in detail as a ‘variable’ across the RA growth scenarios (Section 5.5).
- **Employment land** – there is a need to remain open to boosting supply in respect of both industrial land and employment floorspace in light of the ELR and with a long-term / strategic perspective, but there are no clear options to explore at the current time.
- **Gypsies, Travellers and Travelling Showpeople** – there is a need to identify additional supply, particularly in respect of Travelling Showperson plots, but this is proving very challenging, such that this will be another matter to revisit subsequent to the current consultation. There are no further clear options at the current time.

- 5.4.73. In **conclusion**, housing land supply from two sub-areas – the northern urban edge and Highworth – should be explored further as a variable across the RA growth scenarios.
- 5.4.74. Each sub-area is associated with two scenarios and Section 5.5 looks to combine these to form RA growth scenarios for the Borough as a whole.

## 5.5. Reasonable growth scenarios

- 5.5.1. The final task here, within Section 5 (Defining growth scenarios), is to combine the sub-area-specific growth scenarios defined in Section 5.4 to form a single set of RA growth scenarios for the Borough as a whole.
- 5.5.2. As discussed, the focus is on housing land supply, and a starting point is ‘existing supply’ from completions and commitments, which totals 13,598 homes.
- 5.5.3. Beyond this it is always possible to account for supply from a ‘windfall assumption’; however, the proposal is to add a windfall assumption at the next stage.
- 5.5.4. The next port of call is then ‘new’ supply from: A) those sub-areas where the approach to growth can reasonably be held constant across the RA growth scenarios; and B) the low growth scenario for the two variable sub-areas. This is the preferred growth scenario and leads to a total supply of 25,822 homes. This is **Growth Scenario 1**.
- 5.5.5. Next are those scenarios involving higher growth at just one of the variable sub-areas. This leads to **Growth Scenario 2** and **Growth Scenario 3**.
- 5.5.6. Finally, the question is whether to define and appraise a higher growth scenario involving higher growth at both the variable sub-areas. Total supply would be ~27,000 homes, which is 12% higher than LHN. On balance this scenario is ruled out.
- 5.5.7. In **conclusion**, there are three RA growth scenarios; see Table 5.1.
- 5.5.8. Final points to note are as follows:
- These scenarios are arrived at on the basis of the process set out across this section of the report read as a whole. Suggestions for additional growth scenarios are welcomed but should account for strategic, site-specific and sub-area specific factors.
  - Under scenario 1 the clear intention is to set the housing requirement at LHN. Under the higher growth scenarios it is not possible to reach a conclusion here regarding whether the additional supply would enable a higher housing requirement (e.g. with a view to making modest provision for unmet need) or whether the housing requirement would be set at LHN with the additional supply acting as a ‘supply buffer’. However, this is explored further below as part of the appraisal (under the ‘homes’ heading).
  - Employment land supply is broadly held constant across the RA growth scenarios, as is the approach to providing for GTSS accommodation needs. However, these matters are nonetheless discussed further below as part of the appraisal.
  - A windfall assumption will be determined subsequent to the current consultation.



- At the 'North urban edge' the low growth scenario involves the North Tadpole Strategic Growth Location and then the higher growth scenario involves additional growth in this broad area (west of Tadpole GV / NW of Blundon St Andrews).
- At the 'Northeast urban edge' the 515 homes (over-and-above Kingsdown, which is a commitment) comes from a collection of seven proposed allocations.
- At the 'East urban edge' this is non-committed supply from NEV (1,878 homes) plus three small new sites (144 homes)
- At the 'South urban edge' this is non-committed supply from Wichelstowe.

*Table 5.1: The RA growth scenarios (constants greyed-out)*

Supply component	Scenario 1 Preferred	Scenario 2 + North Swindon	Scenario 3 + Highworth
Completions and commitments	13,598	13,598	13,598
Windfall	0	0	0
Swindon town centre	4,358	4,358	4,358
The wider urban area	2,112	2,112	2,112
North urban edge	513	<b>1,013</b>	513
Northeast urban edge	515	515	515
East urban edge	2,022	2,022	2,022
South urban edge	1,620	1,620	1,620
Wroughton	1,031	1,031	1,031
Highworth	53	53	<b>650</b>
<b>Total homes (2023 - 2043)</b>	<b>25,822</b>	<b>26,322</b>	<b>26,419</b>
<b>Average homes per annum</b>	<b>1,291</b>	<b>1,316</b>	<b>1,321</b>
<b>% above LHN (24,100 or 1,205 pa)</b>	<b>7%</b>	<b>9%</b>	<b>10%</b>

## 6. Growth scenarios appraisal

### 6.1. Introduction

6.1.1. The aim here is to appraise the reasonable alternative (RA) growth scenarios introduced above under the SA framework (Section 3). In summary:

- **Scenario 1** involves supply totalling **25,822 homes** (LHN + 7%) comprising:
  - 13,699 homes from completions and commitments
  - 4,317 homes in Swindon town centre
  - 2,112 homes across the wider urban area
  - 513 homes at the northern urban edge
  - 515 homes at the northeast urban edge
  - 2,022 at the eastern urban edge
  - 1,620 homes at the southern urban edge
  - 1,031 homes at Wroughton
  - 53 homes at Highworth
- **Scenario 2** is (1) plus additional growth north of Swindon, and specifically west of Tadpole GV / NW of Blundon St Andrews, leading to **26,322 homes**.
- **Scenario 3** is (1) plus additional growth at Highworth leading to **26,419 homes**. Here there are no further assumptions made regarding distribution or sites.

#### Appraisal methodology

6.1.2. Under each sustainability topic the aim is to: **1)** rank the scenarios in order of performance (with a star indicating best performing); and then **2)** categorise the performance in terms of 'significant effects' using red / amber / light green / green:

- **Red** indicates a significant negative effect
- **Amber** indicates a negative effect of limited or uncertain significance
- **Light green** indicates a positive effect of limited or uncertain significance
- **Green** indicates a significant positive effect
- **No colour** indicates a neutral effect

#### Appraisal assumptions



- 6.1.3. There is a need to make significant assumptions, e.g. around scheme masterplanning, infrastructure delivery, etc. Assumptions are explained as appropriate, but there is also a need to balance explanation of assumptions with a need for conciseness.
- 6.1.4. As part of this, it is important to reiterate that: under Scenario 2 there is no firm assumption regarding precisely what scheme would deliver additional growth to the east of Tadpole Garden Village / northwest of Blundon St Andrews; and under Scenario 3 no assumptions are made regarding how ~650 homes would be distributed at Highworth.
- 6.1.5. Another key assumption is in respect of the future baseline (very important, as effects are predicted *on the baseline*), i.e. the situation without an adopted plan with a robust land supply. Specifically, the assumption is that there would be further sub-optimal growth under the presumption in favour of sustainable development.

## 6.2. Accessibility (to community infrastructure)

Scenario 1 Preferred	Scenario 2 + North Swindon	Scenario 3 + Highworth
=	=	=

- 6.2.1. Supporting strategic growth locations is a key means of ensuring that new homes come forward alongside new and upgraded community infrastructure. However, it is not clear that there is any significant opportunity associated with additional growth at NW Blunsdon St Andrews. At Highworth there is an opportunity for strategic growth to deliver a new primary school, but the need for this is currently uncertain. The possibility strategic growth to the north delivering a new local centre is potentially an option, and another factor is that there is understood to be capacity at the secondary school.
- 6.2.2. Overall it is not possible to differentiate between the scenarios with confidence.
- 6.2.3. However, at both of the variable growth locations it is important to say that any growth should be comprehensive rather than piecemeal, with a view to fully realising growth-related opportunities / avoiding missed opportunities. This is perhaps most notably the case in respect of further growth to the north of Swindon. However, also at Highworth there is a need to acknowledge that recent and committed growth is somewhat piecemeal, most notably to the southeast of the town (e.g. comprehensive growth might have explored the possibility of a A361/B4000 link road to the benefit of the schools hub to the north).
- 6.2.4. With regards to significant effects, there are many positive aspects associated with the preferred urban focused strategy, as well as supporting the existing committed strategic allocations (including supporting additional homes at NEV to deliver on the vision). However, there is a need for further work, not least around town centre community infrastructure. These are matters that have been discussed above in Section 5.

## 6.3. Air quality

Scenario 1 Preferred	Scenario 2 + North Swindon	Scenario 3 + Highworth
	2	

- 6.3.1. Whilst car traffic associated with higher growth scenarios is a significant concern, it is difficult to suggest that this translates into significant concerns in respect of air quality. There is only one small Air Quality Management Areas (AQMA) in the Borough, and whilst there is a large AQMA covering the entirety of Marlborough, there is no reason to suggest any significant concerns in respect of growth in Swindon Borough.
- 6.3.2. However, a further matter for consideration is air pollution from the A419 affecting North Meadow SAC at Cricklade. This is 'biodiversity' consideration as much as an 'air quality' consideration, if not more so, but it is appropriate to flag a concern here (under 'air quality') regarding the option of further growth at NW Blunsdon St Andrews. This also aims to reflect the fact that further growth to the north of Swindon would not align with the vision-led transport strategy and, in turn, could lead to a degree of additional concerns around localised air quality issues, even if not within an AQMA.
- 6.3.3. At Highworth peak time traffic through the town centre is known to be an issue, including from those commuting to work in Swindon, but there are no designated AQMAs.
- 6.3.4. With regards to significant effects, whilst air quality is not a major issue in Swindon, major growth in the town centre could potentially give rise to issues, including air pollution and wider environmental quality issues associated with construction. However, growth would happen over time and with much potential for mitigation including through careful phasing, plus there is the context of air quality improving nationally over time.

## 6.4. Biodiversity

Scenario 1 Preferred	Scenario 2 + North Swindon	Scenario 3 + Highworth
=	=	=

- 6.4.1. The two variable growth locations are associated with limited biodiversity constraint when viewed in the sub-regional context. In particular, Highworth is subject to notably low biodiversity constraint (e.g. nearby Shrivenham/Watchfield and Faringdon are likely more constrained, noting nationally designated SSSIs and ancient woodland). There is a degree of constraint to the south, but only in the form of small patches of priority habitat (woodland), and there is no ancient woodland in the vicinity. The onsite habitat likely forms part of a wider network at a wider landscape scale (a band of fragmented woodland patches (not ancient woodland) linking the Bydemill Brook and River Cole corridors) but concerns are overall limited and there is mitigation/enhancement potential.
- 6.4.2. With regards to the option of further growth NW of Blunsdon St Andrews, there is an important constraint in the form of proximity to North Meadow SAC, but taking the key 'impact pathways' in turn: A) there would likely be good potential to mitigate recreational pressure through new Suitable Alternative Natural Greenspace (SANG), albeit this would impose a cost on development (with implications for funding available to deliver on wider objectives); and B) the A419 traffic / air quality issue has been covered above.
- 6.4.3. With regards to significant effects, there is strong support for the proposed urban focused strategy, and no major concerns regarding intensifying growth within NEV (indeed, this area is subject to notably low biodiversity constraint in the sub-regional context). In the urban area there is extensive coverage of mature trees to the north of the train stage, where a major new urban community is proposed, but there are no trees here with a Tree Protection Order (TPO), and it can be envisaged that retaining existing mature trees will be a key masterplanning / design priority, including accounting for the importance of urban shading in the context of urban 'overheating' as a growing issue. An important network of ancient woodlands is also a constraint to growth at the Pipers Way Urban Regeneration Area, but there is little reason to suggest that redeveloping existing employment land generates a concern, and there could be some targeted opportunities to be realised, e.g. new habitat creation. Given these factors and recalling that the baseline situation is one whereby the Borough continues to see relatively uncoordinated growth under the presumption in favour of sustainable development, it is considered appropriate to predict 'moderate or uncertain positive effects'.


## 6.5. Climate change adaptation

Scenario 1 Preferred	Scenario 2 + North Swindon	Scenario 3 + Highworth
=	=	=

- 6.5.1. A key consideration here is flood risk, and this is not a major constraint to growth at either of the variable growth locations, reflecting topography/geology. At Highworth significant surface water flood risk is a constraint to the north of the town, but there is often potential to avoid/mitigate concerns, and (to reiterate) there is no assumption that this would be the preferred location for growth at Highworth under Scenario 3.
- 6.5.2. With regards to significant effects, there is strong support for the urban focused strategy from a flood risk perspective, as unlike many other towns and cities flood risk is not a major issue in Swindon, with river / stream / main surface water flood risk for the most part associated with green/blue infrastructure corridors designed-in as part of 20<sup>th</sup> century expansion. There is, however, a need to recall that urban sites associated with a low intensity use – e.g. carparking, commercial, offices, industry – and now under consideration for intensification can tend to be associated with surface water flood risk.

- 6.5.3. There are surface water flood risk channels at both of the new proposed greenfield Strategic Growth Locations – North Tadpole and East Wroughton – but in both cases it appears unlikely that these will be a barrier to effective masterplanning.
- 6.5.4. This leaves the matter of NEV intensification, recognising that NEV is very strongly associated with a network of flood risk channels associated with the River Cole / the Vale. This is a matter for ongoing scrutiny, but, at the current time, there are no major concerns in the knowledge that much detailed work has been undertaken over the years to explore how NEV can come forward as a series of linked villages interspersed by a network of green/blue infrastructure contained within which are the areas of flood risk.
- 6.5.5. Finally, it is important to say that risk of urban overheating during heatwaves (likely to become more frequent) is an important climate change adaptation consideration, as is dealing with storm water in urban areas given a likely increase in the frequency and severity of storm events. However, it is difficult to conclude that the proposed high-ambition urban growth strategy gives rise to a concern, given the potential to master plan and design with these issues in mind (albeit also recognising that there will be many competing priorities in the context of challenging development viability).

## 6.6. Climate change mitigation


Scenario 1 Preferred	Scenario 2 + North Swindon	Scenario 3 + Highworth
	2	2

- 6.6.1. This is clearly a priority issue, and there is an important distinction between built environment and transport emissions. The former warrants being a particular focus of attention under this topic heading (given transport is a separate topic), but it is difficult to suggest that either of the variable growth locations represent a particular opportunity in respect of delivering net zero development.
- 6.6.2. Strategic scale sites can benefit from economies of scale in support of development viability ‘headroom’ for net zero interventions but equally can face a variety of very significant cost challenges relating to infrastructure, which can ‘squeeze’ available funds for net zero. Focusing on the current planning application for a 410 home scheme at NW Blunsdon St Andrews (which is clearly of note, albeit there is no firm assumption that this specific scheme would deliver Scenario 2), the Planning Statement does include some positive commitments, but these warrant further scrutiny. Specifically:
- *“The scheme would have an exemplar sustainable building design and would target on-site net zero carbon housing and a host of sustainable design techniques that respond positively to the Council’s declared climate emergency.”*
  - *“All units will feature energy performance measures, such as photovoltaic panels and air source heat pumps, achieving net zero-carbon for all houses and significant carbon reduction well beyond current requirements.”*
- 6.6.3. With regards to Highworth, the town benefits from notably stronger development viability than is the case for the Swindon urban area, but development viability is not as strong at Highworth in comparison to other towns and villages in the Borough and across the sub-region. Very recently a planning application has been submitted for a 250 home scheme to the north of the town, and the proposal is only for new homes to be *net zero ready*, which is a notably different commitment to *net zero* (specifically, net zero ready means that they will be net zero once the national grid fully decarbonises).<sup>10</sup>

<sup>10</sup> For context the proposal is also to deliver affordable housing in line with current local policy requirements, specifically: *“The proposed development will deliver a policy compliant number of affordable homes on site, i.e. 30% of the total number to be built. Should 250 new homes be built on site, 75 of them will be affordable as required by the adopted Local Plan. Affordable housing will be in a mix of tenures, including low cost home ownership, social rented and first homes, and will be the subject of discussions with Swindon Borough Council (SBC) and confirmed in the S106 Agreement.”*

- 6.6.4. With regards to significant effects, at this stage ‘moderate or uncertain’ negative effects are predicted across the scenarios on the basis that achieving the required trajectory to net zero is highly challenging, such that there is a clear case for placing the realisation of built environment decarbonisation opportunities as a central pillar of strategy / site selection. It is recognised that the Borough has not set a net zero target date ahead of the national net zero date (unlike many neighbouring local authorities nationally and some locally, such as West Berkshire), but it is nonetheless the case that the required decarbonisation trajectory is so stretching that there is a high bar to predicting even a ‘neutral’ effect. The strategy of focusing heavily on the town centre and wider urban area is clearly strongly supported from a transport decarbonisation perspective, but development viability will be a barrier to built environment decarbonisation given competing priorities including affordable housing and infrastructure delivery (N.B. there is also a wider discussion around the merits of high density versus lower density living from a built environment decarbonisation perspective). At NEV further work might be undertaken to explore whether the new higher growth strategy could perhaps give rise to the possibility of delivering the scheme as a national net zero exemplar although, once again, it is recognising that decarbonisation is just one policy priority amongst many.

## 6.7. Communities

Scenario 1 Preferred	Scenario 2 + North Swindon	Scenario 3 + Highworth
	2	2

- 6.7.1. Discussion under this topic is an opportunity to explore wide-ranging issues / opportunities over-and-above those relating to ‘accessibility’ (as discussed above).
- 6.7.2. At Highworth it is recognised that there would be a need to carefully consider the distribution growth including accounting for the view of the Town Council, e.g. as set out in the Draft Neighbourhood Plan in 2024, although it is also important to recognise that as a draft for consultation the plan is subject to change. Within the Draft Neighbourhood Plan the proposal was to assign a local greenspace or biodiversity designation to much of the land surrounding the town, potentially serving to focus attention on the option of growth to the north (of those potential options introduced in Section 5.4). Overall, it is recognised that delivering growth at Highworth is challenging in ‘communities’ terms. There is a need to account for the views of the Town Council and local residents as far as possible and also seek to ensure that any growth is carefully targeted to maximise community benefits (‘planning gain’), putting an end to ongoing piecemeal / relatively uncoordinated growth with opportunities missed to deliver strategic infrastructure etc.
- 6.7.3. It is equally fair to highlight a potential concern with further growth to the north of Swindon, given the scale of recent, ongoing and committed growth in this area.
- 6.7.4. With regards to significant effects, on the one hand it might be anticipated that a strongly urban and transport focused strategy will be supported locally because the effect will be to minimise pressure on greenfield land. Also, regeneration of the town centre is clearly a major priority for the Borough’s residents. However, on the other hand, there are many community-related issues and opportunities to work through before delivering on a high growth strategy for the town centre and wider urban area, and it is important to recognise that the proposed strategy is a new direction quite distinct from the adopted Local Plan and proposals set out in Local Plan consultation documents since 2015.
- 6.7.5. Taking all of these factors into account it is very difficult to reach a conclusion but, on balance, a ‘moderate or uncertain’ positive effect is predicted for Scenario 1.
- 6.7.6. Regardless of the conclusion at the current stage, what is of great importance is accounting for responses received through the current consultation ahead of plan finalisation. At the next stage (Reg 19) it is hoped that it will be possible to predict a ‘significant positive’ in respect of the preferred growth scenario.

## 6.8. Economy and employment

Scenario 1 Preferred	Scenario 2 + North Swindon	Scenario 3 + Highworth
=	=	=

- 6.8.1. Neither of the variable growth locations would be expected to deliver significant new employment land. At Highworth there could potentially be an opportunity to explore new employment land to the benefit of the town and recognising good links to Oxford (albeit via the centre of Faringdon), but there is not known to be a particular opportunity.
- 6.8.2. With regards to significant effects, as set out in Section 6 the proposal is to provide for headline quantitative needs as set out in the ELR (2025), but there are a range of important caveats and uncertainties that will need to be explored further following consultation. The economic growth opportunity at Swindon is of at least sub-regional importance and so it will be important to take every step to ensure that opportunities are fully realised. Also, looking through a local lens, there is a need to address the fact that Swindon performs poorly against a range of important economic indicators (see below) and capitalise on the fact that, as set out in the ELR:

*"In 2021, the borough's GVA per hour worked (£50.85) was nearly 1.5 times greater than that of the South West (£34.48) and 1.3 times greater than England's (£38.91)."*

## 6.9. Equality

Scenario 1 Preferred	Scenario 2 + North Swindon	Scenario 3 + Highworth
=	=	=



- 6.9.1. The aim here is to consider if and how the Local Plan might significantly impact those with protected characteristics under the Equality Act 2010. By way of context the Employment Land Review (ELR) is a source of evidence around some key issues:<sup>11</sup>
- Deprivation levels in the borough are around average, but parts of the borough have very high levels of skills and training yet also have high levels of income deprivation. In contrast, there are also parts of the borough and surrounding areas within the lowest 10% of deprivation nationally.
  - Swindon is facing a growing public health challenge with rising obesity rates. In 2022/23, 67.8% of Swindon's adult population (18+ years) were overweight.
  - Alcohol-related mortality was 41.6 per 100,000 in Swindon in 2022 – greater than the rate in the South West or England (37.3 and 39.7 respectively).
  - A priority identified within Swindon's Health and Wellbeing Strategy is related to mental health. According to The Strategy, an estimated 15% of residents live with a common mental health disorder and Swindon is the 6th highest area in the country for hospital admissions as a result of self-harm in those aged 15-19 years and 20-24 years.
  - Between 2017 and 2022 the number of jobs in the borough fell by 5,650 or 4.9%. This compares to a growth of 4.5% in the South West Region and 4.7% nationally.
  - Between 2022 and 2023 the borough saw a 3.9% fall in the number of businesses (compared to a 0.7% fall regionally and a 1.6% fall in England).
  - Swindon's unemployment rate (4.1%) is above the SW (3.0%) and England (3.9%).

<sup>11</sup> Statistics that serve to highlight socioeconomic economic issues are important for consideration of equality issues/impacts in the context of local plan-making, recognising that: A) those communities, households and individuals with protected characteristics that also face socio-economic challenges warrant being a key focus; and B) the Local Plan has a key role to play in terms of addressing socio-economic issues and realising opportunities.



- A considerably higher proportion of Swindon Borough's employment (24%) is in the lowest-skilled groups compared to the South West (16%) and England (15%).
  - Swindon Borough also has lower proportions of the working-age population with degree-level qualifications (33.7% compared to 42% in the SW and 43.2% in England).
- 6.9.2. There is no potential to meaningfully differentiate between the alternative growth scenarios, other than to say that higher growth could make for a more robust Local Plan such that there is minimal risk of the Borough facing the presumption in favour of sustainable development, which has been an ongoing issue over recent years, and feasibly gives rise to negative implications in that growth comes forward in a relative uncoordinated way with insufficient strategic consideration given to equality objectives.
- 6.9.3. However, it is important to flag that the town centre and wider urban focused strategy gives rise to a range of important considerations. These can be explored further following the current consultation, but key considerations are potentially around: 1) town centre regeneration, which on the one hand should be a major positive in the long term, but in the short term will give rise to considerable disruption over the construction period; 2) ensuring community infrastructure is delivered alongside new homes in the town centre (a matter that has already been discussed above); and 3) change of use at existing employment sites and more broadly a shift in the nature of local employment opportunities, feasibly with a risk that those suited to lower skilled work could face increased challenges around accessing suitable employment, albeit there is much potential to mitigate concerns including through a skills and education strategy.
- 6.9.4. In conclusion, it is not clear that there are any significant concerns, recognising limited direct links between the equality objectives and the spatial strategy at the heart of the Local Plan (e.g. many key equality issues/opportunities are a significant consideration at the planning application stage more so than at the local plan stage). However, this will be an important subject to return to following the current consultation, recalling that the spatial strategy at the heart of the Local Plan represents "a new strategic direction".

## 6.10. Historic environment

Scenario 1 Preferred	Scenario 2 + North Swindon	Scenario 3 + Highworth
		2

- 6.10.1. The historic environment is a key constraint to growth at Highworth, given: a highly valued historic town centre; archaeological constraint associated with the Mid Vale Ridge; and conservation area(s) to the west of the town. Whilst the appraisal of Scenario 3 is not undertaken with any firm assumptions regarding the distribution of growth, there are clear constraints to expansion to the west and to the east, whilst expansion to the north would generate additional car traffic through the historic core (albeit the historic high street is located off the main road through the town). With regards to growth to the southwest, this is strongly undulating land associated with the Mid Vale Ridge, and it is noted that the Draft Neighbourhood Plan shows a clear view of the Grade I listed church across this land; however, there would likely be good potential to minimise and mitigate concerns, including via extensive strategic green infrastructure.
- 6.10.2. With regards to the option of additional strategic growth to the north of Swindon (Scenario 2), there appears to be overall quite limited historic environment constraint.
- 6.10.3. With regards to significant effects, the town centre-focused strategy that underpins all of the growth scenarios gives rise to a range of important issues and opportunities, most notably relating to Swindon's railway heritage, and it is clear that matters are at the core of the Heat of Swindon Vision. For example, redevelopment of Bristol Street Car Park adjacent to the Railway Village could well represent a heritage opportunity. Finally, at Wroughton there is support for a focus of growth to the north (as discussed) and at NEV a network of scheduled monuments has long featured as a key masterplanning factor.



- 6.10.4. In light of the above discussion there is a case to be made for predicting positive effects across the growth scenarios (perhaps not Scenario 3), recalling that the baseline situation is one whereby there would be ongoing sub-optimal growth under 'the presumption' (as per the discussion above under 'biodiversity'). However, at this stage it is considered appropriate to predict a 'neutral' effect ahead of consultation with Historic England and ahead of further detailed work, particularly around the town centre strategy.

## 6.11. Homes

Scenario 1 Preferred	Scenario 2 + North Swindon	Scenario 3 + Highworth
2	1	1

- 6.11.1. Under Scenario 1 (the preferred approach) the proposal is to set the housing requirement at LHN with a healthy supply buffer. However, there is nonetheless a 'homes' case to be made for the higher growth scenarios, given:
- There is a case to be made for a higher supply buffer commensurate with the level of delivery risk across the proposed supply (notably the town centre and NEV) and learning lessons from the adopted Local Plan (i.e. the lack of a 5YHLS in the years since its adoption). However, it is important to say that: A) the current assumed supply does not include a windfall assumption; B) the hope is that the current consultation will lead to additional sites being submitted for potential allocation in the town centre and in the urban area along the identified transport corridors; and C) further work through and subsequent to the current consultation should serve to firm up delivery certainty.
  - Furthermore, additional sites under Scenarios 2 and 3 might deliver relatively early in the plan period (e.g. noting current planning applications), which could potentially assist with ensuring that the Council can maintain a five year housing land supply over the crucially important early years of the plan period (ahead of a Local Plan review). In turn, the effect would be to minimise any risk of having to fall back on a stepped housing requirement (i.e. a situation whereby needs risk going unmet in early years).
  - There is a case to be made for a higher housing requirement, particularly on account of the risk of unmet need from Cotswold District, albeit this case is somewhat weak.
  - The sites that would be additionally allocated under Scenarios 2 and 3 would be well placed to deliver affordable housing (including social rented), family housing and potentially specialist housing. As part of this, it is important to note that Council-owned land can be well placed to deliver affordable housing and wider planning gain.
  - There could feasibly be the potential to deliver Gypsy and Traveller pitches.


## 6.12. Landscape

Scenario 1 Preferred	Scenario 2 + North Swindon	Scenario 3 + Highworth
1	2	2

- 6.12.1. There is strong support for Scenario 1 (the preferred scenario), such that there is a case for predicting a 'signification' positive effect, but on balance a 'moderate or uncertain' positive effect is predicted at this relatively early stage.
- 6.12.2. Both of the new proposed greenfield Strategic Growth Locations – North Tadpole and East Wroughton – give rise to limited landscape concerns, although at both locations there is a need to ensure a comprehensive approach to growth with a long term perspective, i.e. in order to strategically plan for green / blue infrastructure and minimise the risk of sub-optimal development creep / sprawl over time.


- 6.12.3. At Wroughton the assumption here is that growth to the north gives rise to limited concerns in respect of impacts to the setting of the North Wessex Downs National Landscape, but this will need to be confirmed. At north Tadpole a potential concern is long term creep towards the River Thames Corridor, but the intervening River Ray floodplain greatly reduces concerns in this regard.
- 6.12.4. The other key 'constant' growth location is then Kingsdown / Broad Blunsdon, where there is a need for a long term strategy in respect of avoiding coalescence.
- 6.12.5. Both of the areas that would see additional growth under Scenarios 2 and 3 are then associated with notable and arguably significant landscape constraint on account of the relationship between settlement pattern and the Mid Vale Ridge. However, the significance of concerns is uncertain, including recalling that the sensitivities involved are likely of local significance rather than larger-than-local (and certainly not national).
- 6.12.6. At NW Blunsdon St Andrew there is a clear need to plan strategically for this Ridge / Vale transitional landscape. At Highworth there are important choices to be made regarding expansion of the town in a way that aligns with landscape objectives, and it is unfortunate that the opportunity for well-rounded and relatively well-contained growth across the southern sector of the town appears now to have been missed on account of recent permissions under the presumption in favour of sustainable development.

## 6.13. Soils and resources

Scenario 1 Preferred	Scenario 2 + North Swindon	Scenario 3 + Highworth
	2	2


- 6.13.1. A key issue to focus on here is loss of best and most versatile (BMV) agricultural land, which the NPPF classifies as land that is of grade 1, 2 or 3a quality.
- 6.13.2. At Blunsdon St Andrews much of the land in question has been surveyed to establish agricultural land quality, such that there is no need to rely on the nationally available dataset, which is low resolution and does not distinguish between grades 3a (BMV) and 3b (not BMV). This shows land to be of grade 3a quality, i.e. such that it is BMV. At Highworth none of the land surrounding the town has been surveyed in detail, and the national dataset shows all land to be of 'grade 3' quality (such that it may or may not be BMV), but it is also noted that there are areas of grade 2 land in the vicinity of the town.
- 6.13.3. With regards to the new proposed greenfield allocations that feature as a constant across the growth scenarios:
- North Tadpole – has been surveyed and comprises grade 3b quality land (not BMV)
  - East Wroughton – has not been surveyed, but nearby land has (Wichelstowe) and has been found to comprise grade 3b quality land.
  - East of Broad Blunsdon – has not been surveyed, but adjacent land has and has been found to comprise grade 3b quality land.
  - Southwest of Broad Blunsdon - surveyed and found to comprise grade 3a quality land.
- 6.13.4. In conclusion, it is appropriate to flag a preference for Scenario 1 on balance, but it is also important to note that the effect of Scenarios 2 and 3 could feasibly be to reduce pressure for growth in the southern part of Cotswold District (outside of the National Landscape) where there is very extensive grade 2 quality agricultural land.
- 6.13.5. Aside from agricultural land quality one other consideration is avoiding the sterilisation of known minerals resources, but this is not known to be a major issue on the basis of the adopted Core Strategy, albeit it is recognised that a new strategy is forthcoming.

## 6.14. Transport

Scenario 1 Preferred	Scenario 2 + North Swindon	Scenario 3 + Highworth
	3	2

- 6.14.1. Transport objectives are at the heart of the preferred strategy (Scenario 1) as has been discussed, notwithstanding the need for further work, and also a need to identify new development sites along key transport corridors to secure investment. Growth at Highworth would not align fully with the vision-led transport strategy, but the town has a good local offer, there is a good bus service and there may be potential to explore opportunities around delivering strategic enhancements to transport infrastructure. Additional growth to the north of Swindon is not supported in transport terms, as discussed, but a focus on strategic/comprehensive growth could ensure that those opportunities that exist for improved transport infrastructure and services are realised.

## 6.15. Water

Scenario 1 Preferred	Scenario 2 + North Swindon	Scenario 3 + Highworth
	2	2

- 6.15.1. The Water Cycle Scoping Study (2025) considers a range of issues, but it is capacity at sewage treatment works (STWs) that is the primary issue with a bearing on spatial strategy (both hydraulic capacity, to avoid spills of untreated wastewater, and the environmental capacity of the watercourse receiving treated wastewater). Whilst upgrades are often possible, these are associated with major costs and a risk of delay, such that growth should be directed in line with capacity or known potential for upgrade.
- 6.15.2. The WCS models Dry Weather Flow (DWF) for the following STWs:
- Swindon – is the key STW for consideration. It is currently using 85% of its DWF permit, and post local plan growth (on the basis of a range of assumptions) is projected to 108% of its DWF permit, such that there is a need for an upgrade.
  - Blunsdon – primarily serves land east of the A419 but may also serve some land to the west of the A419 (i.e. potentially to include NW Blunsdon St Andrews). It is currently using 84% of its DWF permit, and post local plan growth is projected to use 121%.
  - Highworth – there is a data issue here, such that the modelled analysis is unreliable.
  - Wanborough – has good capacity, both now and in 2043 under the modelled local plan scenario but need not be a focus as it serves only Wanborough (not also Wroughton).
- 6.15.3. The WCS goes on to explain:

*“For the STWs showing an exceedance of their maximum permitted DWF post-growth, additional headroom could potentially be made available through... a revised discharge permit from the Environment Agency (EA). Additionally, SBC should liaise with [Thames Water] to assess alternative ways of discharging wastewater, as potentially wastewater could be directed to STWs with adequate treatment capacity. It is also recommended that SBC should continue to update [Thames Water] on... changes to growth allocation to ensure that plans for STW upgrades in response to permit change requirement or flow capacity constraints take into account the most up to date planning position... Prior to development... SBC and [Thames Water] should be satisfied that the development can be accommodated... If necessary, a Grampian condition might have to be applied prohibiting development until the provision of the necessary infrastructure...”*

- 6.15.4. In this light, it is clear that wastewater treatment capacity is a significant constraint, although it is important to add that this is not uncommon nationally.
- 6.15.5. On the one hand this serves to highlight a concern with the higher growth scenarios. However, on the other hand, it serve to highlight a delivery risk associated with Scenario 1 and, in turn, an argument for supporting additional supply as a contingency. This is another key matter that will need to be explored further post consultation.

## 6.16. Appraisal summary

- 6.16.1. In summary, the appraisal finds all of the RA growth scenarios to be associated with pros and cons, and it is for the Council to weigh these 'in the balance', trading off between competing objectives as necessary before then arriving at a conclusion regarding which of the scenarios best represents sustainable development.
- 6.16.2. Scenario 1 ranks highest across the greatest number of topics, but this should not be taken as in any way confirmation that it is best performing overall or best represents sustainable development. That is because: A) the sustainability topics are not assumed to have equal weight; and B) there is also a need to factor-in the significance of effects.
- 6.16.3. In particular, the were the Council to give particular weight to 'homes' related objectives then this could lead to a conclusion that Scenario 1 is not best performing.
- 6.16.4. Furthermore, topic-specific appraisal conclusions are themselves often reached on balance and are open for discussion through the current consultation. As part of this, there is a need to acknowledge the inherent challenge of factoring-in the benefits of additional supply to in order to: A) ensure a more robust land supply thereby minimising the risk of the Borough continuing to face the presumption in favour of sustainable development; and/or B) boost the housing requirement such in order to take some pressure of constrained areas across the wider sub-region. There could potentially be wide-ranging positive implications, but it is difficult to pinpoint these with any certainty.
- 6.16.5. Finally, it is appropriate to reiterate key messages from the appraisal above in respect of the 'homes' case to be made for higher growth:
- There is a case to be made for a higher supply buffer commensurate with the level of delivery risk across the proposed supply (notably the town centre and NEV) and learning lessons from the adopted Local Plan (i.e. the lack of a 5YHLS in the years since its adoption). However, it is important to say that: A) the current assumed supply does not include a windfall assumption; B) the hope is that the current consultation will lead to additional sites being submitted for potential allocation in the town centre and in the urban area along the identified transport corridors; and C) further work through and subsequent to the current consultation should serve to firm up delivery certainty.
  - The additional sites under Scenarios 2 and 3 might deliver relatively early in the plan period (e.g. noting current planning applications), which could potentially assist with ensuring that the Council can maintain a five year housing land supply over the crucially important early years of the plan period (ahead of a Local Plan review). In turn, the effect would be to minimise any risk of having to fall back on a stepped housing requirement (i.e. a situation whereby needs risk going unmet in early years).
  - There is a case to be made for a higher housing requirement, particularly on account of the risk of unmet need from Cotswold District, albeit this case is somewhat weak. Clearly provision for unmet need from another local authority can only be considered where this is strongly evidenced, including by demonstration of 'no stone left unturned'.
  - The sites that would be additionally allocated under Scenarios 2 and 3 would be well placed to deliver affordable housing (including social rented), family housing and potentially specialist housing. As part of this, it is important to note that Council-owned land can be well placed to deliver affordable housing and wider planning gain.
  - There could feasibly be the potential to deliver Gypsy and Traveller pitches.

Table 6.1: RA growth scenarios appraisal summary<sup>12</sup>

	Scenario 1 Preferred	Scenario 2 + NW Blunsdon St Andrews	Scenario 3 + Highworth
Topic	Order of preference (numbers) and predicted significant effects (shading)		
Accessibility	=	=	=
Air quality	★ 1	2	★ 1
Biodiversity	=	=	=
CC adaptation	=	=	=
CC mitigation	★ 1	2	2
Communities	★ 1	2	2
Economy / employment	=	=	=
Equality	=	=	=
Historic env.	★ 1	★ 1	2
Homes	2	★ 1	★ 1
Landscape	★ 1	2	2
Soils & resources	★ 1	2	2
Transport	★ 1	3	2
Water	★ 1	2	2

<sup>12</sup> Under each sustainability topic, i.e. within each row of the table, the aim is to: 1) rank the scenarios in order of performance (with a star indicating best performing); and then 2) categorise the performance in terms of 'significant effects' using red / amber / light green / green, where: **red** indicates a significant negative effect; **amber** indicates a negative effect of limited or uncertain significance; **light green** indicates a positive effect of limited or uncertain significance; **green** indicates a significant positive effect; and **no colour** indicates a neutral effect.

## 7. The preferred growth scenario

### Introduction

- 7.1.1. The following text was **prepared by SBC officers** in response to the appraisal above (by AECOM). The text below does not amount to an appraisal.

### Reasons for supporting Growth Scenario 1

- 7.1.2. Scenario 1 is taken forward as the basis for the Draft Local Plan that is currently the focus of consultation. The appraisal shows it to perform suitably well, such that officers believe it to be: *“Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence”* (NPPF para 36).
- 7.1.3. It is acknowledged that there is a ‘homes’ argument for supporting a higher growth scenario, and it is also acknowledged that the higher growth scenarios appraised are associated with limited issues/impacts in some regards. However, there are also certain significant concerns with both of the higher growth scenarios, particularly in terms of landscape, transport and water objectives. The appraisal flags more limited concern with a higher growth strategy involving additional growth directed to Highworth, but it is important to be clear that the appraisal is undertaken without any assumptions made regarding what site or sites would be allocated.
- 7.1.4. At the current time the impacts and risks / uncertainties associated with higher growth are considered to comfortably outweigh the benefits. However, it is recognised that there will be a need to reconsider this position in light of consultation responses received, including consultation responses received from neighbouring local authorities and other partner and stakeholder organisations with a strategic remit (and all such organisations are encouraged to comment on the growth scenarios appraisal).



An image from the Heart of Swindon Vision, 2025

## **Part 2: SA findings at this stage?**

## 8. Introduction to Part 2

- 8.1.1. The aim here is to discuss the current Draft Plan as a whole. Specifically, presented below is a light touch 'commentary' in recognition of: A) the detailed analysis presented above in Part 1; and B) the potential to revisit the appraisal ahead of Regulation 19 when further technical evidence will be available, e.g. viability assessment.

### 8.2. Commentary on the Draft Plan as a whole

- 8.2.1. Within Section 6 the preferred growth scenario is predicted to give rise to: significant positive effects under one topic (**Transport**), 'moderate or uncertain' positive effects under five topics, neutral effects under six topics and 'moderate or uncertain' negative effects under two topics. The appraisal does not predict any significant negatives.
- 8.2.2. Focusing on the predicted 'moderate or uncertain' negatives:
- **Climate change mitigation** – the appraisal conclusion reflects the urgency of the issue, given decarbonisation commitments / targets, and the other key point to note is that the appraisal focuses on built environment decarbonisation rather than transport decarbonisation. It is difficult to envisage an alternative approach to growth that would both perform better in climate change mitigation terms and be 'reasonable' in wider respects (accounting for the plan objectives taken as a whole). However, moving forward: A) there should be a focus on supporting sites well suited to delivering net zero development (or otherwise achieving greenhouse gas emissions standards beyond the minimum requirements set out in Building Regulations) including on account of strong development viability; and B) consideration should be given to Borough-wide net zero development DM policy, which is a key matter of debate nationally at the current time. This is typically a key choice being made through any local plan, given that net zero development policy has viability implications such that there can be a need to accept compromises in terms of wider policy objectives.
  - **Water** – there are some risks and uncertainties in respect of sewage treatment works capacity, which is not uncommon, and it will be important to take careful account of the consultation responses received from Thames Water and the Environment Agency. It is difficult to envisage an alternative approach to growth that would perform better (indeed, the alternatives appraised in Section 6 are judged to perform worse) but there might be ways of adjusting the strategy in order to minimise STW capacity concerns, including accounting for the timings of committed, likely and potential STW upgrades (also upgrades to the wider strategic sewage network) and associated delivery uncertainties. Finally, it is noted that the proposal is to require that new homes achieve a water efficiency standard of 110 litres per person per day, which is the approach most commonly taken. This is important in terms of minimising pressure on STWs, and it should be noted that the Water Cycle Study recommends targeting 80 litres (but, once again, more stringent requirements would come with cost/viability implications).
- 8.2.3. With regards to those topic headings under which there is an overall prediction of a neutral effect, attention focuses on **Economy and employment**, because realising opportunities locally is a matter of larger-than-local significance. Moving forward, it will be important to explore issues, opportunities and options in further detail subsequent to the current consultation before setting out the preferred strategy / approach to supply in order to meet needs with complete clarity for scrutiny at the Regulation 19 stage. The ELR is a crucially important exercise, but efforts to quantify the supply/demand balance can lead to confusion and a risk of over-simplification. A key matter is ensuring a diverse and ultimately well balanced portfolio of employment land supply, with careful consideration given to both: A) locations / geographical spread (e.g. town centre versus campus sites in respect of office floorspace, and locations along key road corridors mindful of the sub-regional context in the case of industrial land) and B) the right mix of site typologies noting the recommendations in the ELR discussed above in Box 5.1.



- 8.2.4. Another important topic in terms of which there is an overall conclusion of a neutral effect but nonetheless a range of important ongoing considerations is **Equality**. Major town centre regeneration is the key issue, and there are a range of risks and opportunities, but there is confidence that risks will be managed, and opportunities realised through ongoing detailed workstreams led by the Council and building on the foundations of the Heart of Swindon Vision. Much comes down to detailed matters around masterplanning and design, and site-specific prioritisation of policy objectives in the context of viability constraints, and so an important consideration moving forward will be supplementing the detail within Policy SGL1: Swindon's Central Area. Furthermore, area-wide DM policies will require ongoing scrutiny in light of Viability Assessment, including HL3: Open Space in New Developments, HL4: Child Friendly Places and Play; and HL5: Community Infrastructure. These policies and others may also have to be revised in light of forthcoming National Development Management Policies (NDMPs), which could provide a good opportunity to provide clarity regarding the distinction between: A) nationally standard policy requirements; and B) locally specific requirements where the Council is making a policy choice regarding what to prioritise.
- 8.2.5. The other topic under which there is a notable conclusion of a neutral effect is **Climate change mitigation**. There are few concerns around flood risk (i.e. fewer than is often the case for local plans with an urban supply focus), but managing over-heating risk associated with town centre densification could warrant an additional policy focus. It is noted that there is a currently a commitment to schemes demonstrating a specified level of performance in respect of the Urban Greening Factor metric, which is supported.
- 8.2.6. Moving on to those topic headings under which there is an overall predicted 'moderate or uncertain' positive effect, attention focuses on: A) **Homes** – the clear proposal is to set the housing requirement in line with local housing need (LHN) from the outset, but there is a need to further scrutinise the robustness of the supply, and providing for the needs of specific groups is another key matter for ongoing consideration, including GTSS; and B) **Accessibility / Communities** – the proposed approach of targeting growth so as to realised community infrastructure benefits (e.g. at Wroughton) is supported, but there is a need to carefully consider what new sites can deliver and achieve in terms of community/ transport/ green infrastructure and wider masterplanning and design aspirations (discussed below), and access to community infrastructure (with capacity) in the town centre will be a matter that warrants further detailed scrutiny.
- 8.2.7. Finally, it is appropriate to conclude by highlighting a key statement within Policy D1: Developer contributions and **viability**: *"Where Local Plan requirements cannot be met by developments as a result of their viability impacts, these proposals will be expected to provide evidence of this in the form of a financial appraisal, which must be produced and independently verified at the applicants' expense. If a financial appraisal demonstrates that required S106 requirements cannot viably be afforded, the Council will prioritise infrastructure as follows: I. Essential road and transport infrastructure to unlock good growth; II. Health infrastructure (including new and expanded health facilities, leisure provision and open space), where there is an identified need. III. New and expanded education facilities, where there is an identified need. IV. Affordable Housing; V. Climate sustainability; VI. Any other matters."* On the one hand, this is a fairly standard statement. However, on the other hand, it is important to recognise that there are specific viability challenges given the proposed urban focused strategy. Moving forward, it will be important to: A) consider possible adjustments to the spatial strategy to ensure a good focus on sites with stronger development viability, not least with a view to providing for affordable housing needs; B) carefully consider area-wide development management (DM) policies from a viability perspective, and not place undue reliance on DM policies being fully implemented, e.g. with a view to achieving net zero objectives/targets (i.e. it is important to recognise that DM policy requirements are weighed in the balance at the planning application stage in the context of any viability constraints that can be demonstrated); and C) set out clear site-specific policy requirements, such that site promoters / developers have ample opportunity to confirm what can be achieved given any known viability constraints prior to plan finalisation and, in turn, the plan can be finalised and adopted with confidence regarding what will be achieved in practice (albeit also recognising that viability challenges are dynamic).

## **Part 3: Next steps**

## 9. Plan finalisation

- 9.1.1. Subsequent to the current consultation consideration will be given to consultation responses received, and further evidence-gathering / analysis and SA work will be undertaken as necessary, before the Council then prepares the Proposed Submission Local Plan for publication under Regulation 19 of the Local Planning Regulations. The formally required SA Report will be prepared for publication alongside, essentially tasked with presenting an appraisal of “the plan and reasonable alternatives”.
- 9.1.2. Once the period for representations on the Local Plan / SA Report has finished the intention is to submit the plan for examination in public alongside a summary of the main issues raised through the Regulation 19 publication period. The Council will also submit the SA Report.
- 9.1.3. At examination one or more Government-appointed Inspector(s) will consider representations before identifying modifications necessary for soundness. Modifications will then be prepared (alongside SA if necessary) and subjected to consultation (alongside an SA Report Addendum if necessary).
- 9.1.4. Once found to be ‘sound’ the Local Plan will be adopted. At the time of adoption a ‘Statement’ must be published that sets out (amongst other things) “the measures decided concerning monitoring”.

## 10. Monitoring

- 10.1.1. The SA Report must present “measures envisaged concerning monitoring”.
- 10.1.2. This current report is not the formal SA Report; however, on the basis of the appraisal presented in Section 9 it is suggested that early consideration might be given to monitoring indicators in respect of employment land, as this is a key area where up-to-date data on need vs supply is crucial to informing strategy / plan-making.

# Appendix I: Regulatory requirements

As discussed in Section 1, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the SA Report. However, interpretation of Schedule 2 is not straightforward. Table A links the structure of this report to an interpretation of Schedule 2, whilst Table B explains this interpretation (N.B. this current report is an Interim SA Report, as opposed to the SA Report, but nonetheless aims to present the information required of the SA Report). Table C then presents a discussion of more precisely how the information in this Interim SA Report reflects the requirements for the SA Report.

*Table A: Questions answered by this Interim SA Report, in-line with an interpretation of regulatory requirements*

Questions answered		As per regulations... the SA Report must include...
<b>Introduction</b>	What's the plan seeking to achieve?	<ul style="list-style-type: none"> <li>An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes</li> </ul>
	What's the sustainability 'context'?	<ul style="list-style-type: none"> <li>Relevant environmental protection objectives, established at international or national level</li> <li>Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance</li> </ul>
	What's the SA scope?	<ul style="list-style-type: none"> <li>Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan</li> <li>The environmental characteristics of areas likely to be significantly affected</li> <li>Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance</li> </ul>
	What are the key issues and objectives that should be a focus?	<ul style="list-style-type: none"> <li>Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment</li> </ul>
<b>Part 1</b>	What has plan-making / SA involved up to this point?	<ul style="list-style-type: none"> <li>Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach)</li> <li>The likely significant effects associated with alternatives</li> <li>Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan</li> </ul>
<b>Part 2</b>	What are the SA findings at this current stage?	<ul style="list-style-type: none"> <li>The likely significant effects associated with the draft plan</li> <li>The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan</li> </ul>
<b>Part 3</b>	What happens next?	<ul style="list-style-type: none"> <li>A description of the monitoring measures envisaged</li> </ul>

Table B: Interpreting Schedule 2 and linking the interpretation to the report structure

Schedule 2	Interpretation of Schedule 2		
The report must include...	The report must include...		
(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the plan seeking to achieve?</i>	i.e. answer – <i>What's the scope of the SA?</i>
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'context'?</i>	
(c) the environmental characteristics of areas likely to be significantly affected;	The relevant environmental protection objectives, established at international or national level		
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'		
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The environmental characteristics of areas likely to be significantly affected	i.e. answer - <i>What's the 'baseline'?</i>	
(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance		
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Key environmental problems / issues and objectives that should be a focus of appraisal	i.e. answer - <i>What are the key issues &amp; objectives?</i>	
(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach')	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the Report]	
(i) a description of the measures envisaged concerning monitoring.	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.		
	The likely significant effects associated with the draft plan	i.e. answer - <i>What are the assessment findings at this current stage?</i> [Part 2 of the Report]	
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan		
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> [Part 3 of the Report]	

**Table C: ‘Checklist’ of how and where (within this report) regulatory requirements are reflected.**

Regulatory requirement	Information presented in this report
a) The report must include: An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Section 2 (‘What’s the plan seeking to achieve’) presents this information.
b) The report must include: The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	Matters (b), (c) and (d) were considered in detail at the scoping stage, which included consultation on a Scoping Report. The outcome of scoping was an ‘SA framework’, which is presented within Section 3. The SA scope is then discussed within the appraisal sections as appropriate, i.e. in light of the options and proposals that are a focus.
c) The report must include: The environmental characteristics of areas likely to be significantly affected;	As above
d) The report must include: ... environmental problems which are relevant... ..areas of a particular environmental importance...;	As above
e) The report must include: The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	The Scoping Report presented a detailed context review and explained how key messages from this (and baseline review) fed into the ‘SA framework’, which is presented within Section 3. Also, information on the SA scope is presented as part of appraisal work in Sections 6 and 9.  With regards to explaining “ <i>how... considerations have been taken into account</i> ”, Section 7 explains reasons for supporting the preferred option, i.e. how/why the preferred option is justified in-light of alternatives appraisal.
f) The report must include: The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.	Section 6 presents alternatives appraisal findings, whilst Section 9 presents an appraisal of the current draft version of the Local Plan as a whole. All appraisal work naturally involved giving consideration to the SA scope and the various effect characteristics.
g) The report must include: The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan...	Section 9 presents recommendations but perhaps more importantly flags ‘tensions’ that can be a focus of further work ahead of plan finalisation.
h) The report must include: An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Sections 4 and 5 deal with ‘reasons for selecting the alternatives dealt with’.  Section 7 explains ‘reasons for supporting the preferred approach’, i.e. explains how/why the preferred approach is justified in-light of the alternatives appraisal.  Methodology is discussed at various places, ahead of presenting appraisal findings.
i) The report must include: ... measures envisaged concerning monitoring;	Section 11 presents this information.
j) The report must include: A non-technical summary... under the above headings	The NTS is presented at the start of this report.
The SA Report must be published alongside the draft plan. Specifically: Authorities... and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan... and the accompanying environmental report before the adoption of the plan...	This Interim SA Report is published alongside a draft version of the Local Plan in order to inform the consultation and then subsequent plan finalisation.
The SA Report must be taken into account, alongside consultation responses, when finalising the plan. Specifically: The environmental report prepared pursuant to Article 5 [and] the opinions expressed pursuant to Article 6... shall be taken into account during the preparation of the plan... and before its adoption or submission to the legislative procedure.	This Interim SA Report will be taken into account when finalising the plan for publication (see Section 10).

## Appendix II: The SA scope

Set out below is the SA framework in full as established in 2023 following consultation on the Scoping Report. Comments are welcome on the SA framework at the current time.

SA topic	SA objective
Accessibility	Support accessibility to community infrastructure, including by delivering infrastructure enhancements - including strategic infrastructure, e.g. new schools and health hubs - that deliver benefits to existing as well as new communities ('planning gain').
Air quality	Take steps to locate, design and deliver development so as to avoid air pollution (NO2 and PM2.5) and support the achievement of air quality objectives, including within the one AQMA.
Biodiversity	Conserve and enhance designated sites, in accordance with their significance, and also account for non-designated habitat and known priority areas, applying the mitigation hierarchy (avoid, mitigate, compensate). Take a landscape-scale approach to biodiversity, focused on a nature recovery networks and resilience, and a strategic approach to Biodiversity Net Gain.
Climate change adaptation	Avoid vulnerable uses in flood risk zones and plan strategically for flood risk to ensure flood risk is reduced across the Borough, taking into account the impacts of climate change. Also ensure the resilience of communities, the economy and infrastructure to wider climate change impacts, including overheating. Linked to biodiversity objectives, support restoration of natural processes and avoid actions that impact the natural environment's resilience.
Climate change mitigation	Contribute to radical reductions in per capita emissions from both transport and the built environment, in line with 'net zero' targets. This should include consideration of 'net zero developments', and strategic consideration of matters relating to renewable heat and electricity generation, transmission and storage. Also, support larger scale renewable energy schemes (e.g. solar farms) and carbon sequestration (e.g. new woodlands, carefully located).
Communities and health	Support wide-ranging objectives (beyond community infrastructure-related; see above), including addressing known issues in respect of determinants of health. Amongst other things, support: active travel; access to green/blue infrastructure, sports pitches/facilities and other recreational facilities; a hierarchy of vibrant and resilient centres that serve a range of functions; reducing issues of relative deprivation, including through targeted regeneration initiatives (also see discussion below under 'Equalities'); and a strategic approach to masterplanning and design e.g. use of agreed design codes.
Economy & employment	Meet the full range of employment land needs and more widely reflect the objectives set out in the NPPF, including boosting productivity. Build on local strengths (e.g. advanced manufacturing), counter any weaknesses (e.g. a town centre in need of regeneration) and address the challenges of the future, including guided by higher level strategy. Recognise Swindon's unique role at the intersection of the South West (e.g. Western Gateway sub-region) and South East (e.g. England's Economic Heartland Sub-region).
Equalities	Plan for Swindon's diverse communities and, in particular, reduce inequality experienced by individuals and groups with protected characteristics. Address relative deprivation as it can be a proxy for equalities issues and given good understanding of how relative deprivation varies spatially across the Borough at strategic scales most relevant to preparation of the local plan. Ensure ongoing evidence gathering around key strategic issues / opportunities.

SA topic	SA objective
Historic environment	Conserve and enhance the historic environment, with a focus on designated assets, but also non-designated assets (including archaeology). Account for specific factors that make an asset or area valuable in historic environment terms, for example, and notably, industrial and railways heritage in the Swindon context. Consider links to character, sense of place and place-making.
Housing	Provide for objectively assessed housing needs (or Local Housing Need, LHN) in line with NPPF paragraphs 11 and 61. Provide for affordable housing and specialist housing / accommodation to meet needs, ensure an appropriate housing mix in terms of size, type and tenure, consider locally rising needs within the Borough and also ensure a focus on delivery / minimising delivery risks.
Landscape	Recognise broad variation in topography, geology, land use and landscape - e.g. raised landscapes versus river valleys - and the relationship to historic and potential future settlement / built form. Protect and enhance the character, quality and setting of valued landscapes at all scales, accounting for varying significance including the nationally significance of the North Wessex Downs. Recognise links to wider objectives (e.g. biodiversity, green infrastructure, heritage). Support comprehensive masterplanning with a long-term perspective and strategic green infrastructure.
Soils and resources	Ensure efficient use of land including a focus on avoiding the loss of best and most versatile (BMV) agricultural land, as far as possible, particularly better quality BMV land. Support minerals and waste planning and seek to reflect circular economy principles.
Transport	Support the achievement of 'modal shift', including through the location and design of development, and support for strategic or otherwise coordinated growth locations. Support the Local Transport Plan, for example in respect of transport infrastructure upgrades, addressing congestion hotspots (and, in turn, supporting public and active transport) and future mobility. Recognise close links to 'accessibility' objectives and - particularly within the main urban area - ensure an integrated approach in terms of targeted growth at centres and along key corridors, e.g. new homes to support new infrastructure.
Water	Direct growth to minimise pressure on water resources and water quality, including accounting for wastewater treatment capacity and any water resource zones associated with particular water stress. Realise opportunities for growth to support new infrastructure.



