



Respondent No: 316

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title

Mrs

Q2. First Name

Debra

Q3. Last Name

Reeves

Q4. Job Title (where relevant)

not answered

Q5. Organisation (where relevant)

not answered

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

Q12. Please set out your comments below. Please be as precise as possible.

I object to the houses being planned for Swindon, my garden floods now, so if the new houses get built I dread to think what the flooding will be like

Q13. Please set out the changes you consider are needed. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

not answered



Respondent No: 317

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Lillian

Q3. Last Name Barth

Q4. Job Title (where relevant) Senior Planner

Q5. Organisation (where relevant) Turley on behalf of Swindon Gospel Trust

[REDACTED]

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[REDACTED]

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[REDACTED]

Q12. Please set out your comments below. Please be as precise as possible.

SBC admin note: Please see attached response.

Q13. Please set out the changes you consider are needed. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

not answered

13 October 2025

By email only

Planning Policy
Swindon Borough Council
Wat Tyler House,
West Beckhampton Street
Swindon
SN1 2JG

Our ref: 03775

Dear Sir or Madam

**REPRESENTATIONS TO THE SWINDON LOCAL PLAN 2043 REGULATION 18 CONSULTATION DRAFT
REPRESENTATIONS ON BEHALF OF THE SWINDON GOSPEL TRUST**

We write on behalf of our client, Swindon Gospel Trust, to submit representations in respect of the Swindon Local Plan 2043 Regulation 18 Consultation.

INTRODUCTION

These representations to the Swindon Local Plan (SLP) Regulation 18 Consultation Draft are made on behalf of the Swindon Gospel Trust ('the Owner') in relation to their site at Land south of Broad Bush, Highworth Road, Blunsdon in Swindon ('Highworth Road site'). The site is being promoted for residential redevelopment and community use.

We welcome the opportunity to provide our comments on the emerging SLP Consultation Draft. Whilst it is positive to see the progression of the SLP, we consider there are fundamental issues with the Consultation Draft which need to be reviewed and addressed.

These representations include a Technical Review of Housing Needs in Swindon, prepared by Turley (Appendix 1) which reviews the emerging approach towards housing provision in the SLP and should be read alongside this letter.

These representations should be viewed alongside the 'Call for Sites' submission previously submitted in respect of this site to the 2023 Swindon Borough Council 'Call for Sites'.

By way of background, the Owner is promoting the Highworth Road site which has been included as part of a new site allocation in the SLP. The site known in the SLP as 'Land south of Highworth Road' (Regulation 18 site allocation Reference 18-030) is proposed to be allocated for an indicative 89 residential dwellings, as set out in Appendix 1 (Site Allocations) of the SLP. The Swindon Gospel Trust owns the eastern part of the site, with the western part of the site beyond the tree belt under separate ownership.

Turley (Reading)

[Redacted signature block]

[Redacted email address] turley.co.uk

The site was included within Swindon Borough Council's Strategic Housing and Economic Land Availability Assessment (SHELAA), published in September 2025 as follows:

- Site ref. S0062 – Land south of Highworth Road, Blunsdon: 5.92 hectares and promoted for residential redevelopment.

The Highworth Road site received the following assessment in the SHELAA having been categorised as 'developable':

"Site currently located outside of settlement boundary but in close proximity to Kingsdown strategic site. Currently also within an area defined as non-coalescence. Site fronts B4019 and is located opposite and next to residential. Prominent hedgerows through site. Concerns relating to heritage and ecology. Concerns also relating to location and lack of access to facilities and services. However, planned change in local area at Kingsdown and Abbey Stadium may provide mitigation and improve access to services. Development would need to be phased accordingly. Opportunity to link development site into larger cluster. Residential preferred."

A Sketch Plan (see Appendix 2) has been prepared for the site and demonstrates how residential development and a new community use in the form of a Gospel Hall could come forward on the site. This plan incorporates an assessment of the site characteristics and opportunities.

There are no landscape designations relating to the site. The Sketch Plan illustrates how the layout of future development on the site can be designed, utilising and enhancing the existing trees and hedging that form the boundaries to the site and providing new native tree and other planting. This would reduce any visual impact of the development to the south and east.

The Development will not result in any impression of coalescence between Blunsdon and the proposed Kingsdown Strategic Allocation.

There are no known constraints which would prevent the development of the site, and no known heritage or ecological constraints. There is a high pressure water main that crosses the site, and this has an easement which will be taken into account through the layout of future development. Appropriate technical reporting would be prepared to ensure that matters such as transport, landscape, heritage and ecology are adequately assessed and considered.

The site is within a sustainable location, adjacent to the settlement of Blunsdon. Blunsdon has a wide variety of local facilities and services including a Church, Primary School, GP Surgery, Parish Hall, the Blunsdon House Hotel and Leisure Club and the Heart in Hand Pub. A second hotel and accompanying restaurant / pub lie a few hundred metres west of the site (Premier Inn and Cold Harbour).

Further facilities, services and amenities can also be found nearby, such as the new retail and leisure development at Latham Road in Blunsdon St Andrew, and the Orbital Shopping Park in North Swindon.

The site is located in close proximity to a bus stop and pedestrian route, however, it is acknowledged that these are located on the opposite side of the road with existing crossing facilities. As such, as part of a future proposal, an improved footpath from the existing footpath into the site is would be proposed as well as a crossing across Broad Bush (B4109) to assist with pedestrian connectivity to the rest of Blunsdon.

The site is also close to, but visually separate from the Kingsdown Strategic Growth Location, within which a local centre including retail, nursery, primary school, and sports will be provided, alongside significant infrastructure improvements.

It is within this context that we provide comments on the emerging Swindon Borough Local Plan Review, with consideration of the tests of soundness as set out in the National Planning Policy Framework (NPPF).

CHAPTER 4 - SPATIAL STRATEGY AND STRATEGIC AREA POLICIES

The Plan Period

Paragraph 1.9 of the plan explains that the aspiration is to set out a long-term vision and strategy for growth, over a 20 year period to 2043. We support this aspiration in principle. However, at the time of writing (2025) there is just 18 years left of the emerging plan period. Based on the Council's own timetable for the next steps for the plan (as set out in the March 20-25 Local Development Scheme [LDS]) adoption of the plan is not anticipated until December 2027. At this point there would be just 15 years left of the plan period. In our experience LDSs are often optimistic with regards to how long the process will take before a plan can be adopted. In our view it is highly likely that this timetable will slip and that the plan could be at risk of being adopted with less than 15 years remaining. Paragraph 22 of the NPPF is clear that strategic policies should look ahead for a minimum of 15 years, and that this should be from adoption.

Recommendation

At present there is insufficient time allowed for over the plan period to ensure that there will be at least 15 years remaining at the point the plan is adopted. As a consequence we suggest that the plan period needs to be extended, at least until 2045, in order to ensure a realistic prospect that the plan is looking ahead of the mandatory minimum requisite amount of time at the point of adoption.

Policy SS1 Swindon's Spatial Approach to Growth

The focus for the spatial strategy is that housing, commercial, and industrial growth will occur at Swindon Urban Area and the Strategic Growth Locations. In principle we support the intention to focus growth within the Borough at Swindon, although, as set out below, it is important that a sufficient quantum of available and deliverable sites are identified (including a sufficient contingency) to ensure that housing needs are met in full. This includes the need to ensure that the identified sites are viable.

Part 2 of Policy SS1 states that supplementary growth may also be acceptable within larger villages, small villages and hamlets. The policy text states that this growth is likely to include minor development, service provision and infill and that it should be 'sympathetic to local character'.

Swindon Town is the major settlement within the Borough, and accordingly should be the primary focus for regeneration, growth and development over the emerging plan period. However, for the detailed reasons set out in our responses to Policy SGL 01 below, we consider that the plan as currently drafted significantly overestimates the likelihood that the Town Centre regeneration sites will deliver the levels of growth anticipated in the timescales set out. It has been the aspiration to regenerate the Town Centre throughout the current plan period and there is clear evidence that timescales for sites coming forward has slipped continually and that there are a range of complex, site specific issues, including major viability issues, that have caused delays.

Continuing to ignore the well evidenced barriers to progression of these (town centre) sites as part of the emerging plan will lead to a repetition of the outcomes recently experienced – i.e. that key regeneration sites will not come forward as anticipated and that other housing sites will need to be identified in order for the Council to maintain a five year housing land supply, and to ensure that the mandatory minimum housing requirement is delivered over the plan period.

There have also been delays with the Strategic Growth Locations (SGLs) over the last plan period. Again, we support in principle the continued identification of these locations for growth, and the proposed extensions to them, but they cannot be relied upon to deliver as anticipated. The Council are, in our view, underestimating the timescales needed for homes to be delivered on these sites and failing to take into consideration the lessons learnt in recent years about delays to delivery.

The plan needs to be amended to embed a broader, more resilient approach to the spatial strategy from the outset, with an increased number of small and medium sites across the Borough. Broad Blunsdon is a key village which is a sustainable location at which a quantum of housing growth could be accommodated in the new plan period. The identification of sufficient small and medium site allocations such as the Highworth Road site, is very important to help ensure that the planned housing delivery remains on track.

CHAPTER 6 - PLACES FOR PEOPLE

Policy SP2 - Homes for the Community

Policy SP2 identifies that the standard methodology derived local housing need (LHN) figure for Swindon is 1,205 homes per annum. Over a 20 year plan period, this equates to a total housing requirement of 24,100 homes. We do not disagree that the LHN should be the starting point for the level of housing growth to be planned for in the Borough, as per paragraph 62 of the NPPF. However, this is a minimum housing requirement, and should be reflected as such in the policy.

The Technical Review of Housing Needs in Swindon, appended to these representations, concludes that the Council should aim to reflect a more positive economic context and reconsider whether job growth is likely to generate a greater need for housing than implied, as only a minimum, by the standard method.

As currently drafted, Policy SP2 states that 'the Council will seek to enable these (housing) targets to be met subject to all relevant policies of this Plan'. This statement does not provide a clear and unambiguous commitment to meeting housing needs in full in line with the aims of national planning policy set out within the National Planning Policy Framework (NPPF). There is a clear national policy imperative to significantly boost the supply of housing, and so the Plan should more explicitly identify meeting the housing needs in full as one of the critical issues to be addressed. As a consequence any references to LHN within the plan should be referenced as a minimum/'at least' figure.

At present, the draft plan proposes to meet the Local Housing Need (LHN) over the plan period and the details of what sites will deliver what elements of the overall housing need is included in the site specific policies for the Strategic Growth Locations (Policies SGL 01- SGL06) and Urban Regeneration Areas (Policies UGA 01 and UGA 02) and in the Site Allocations listed at Appendix 1 of the draft plan. There is a lack of a clear summary set out within Policy of where the growth will be accommodated, particularly where it is to be accommodated on sites which are not 'new' to this plan. Some detail is included in the trajectory at Appendix 3 to the plan, and paragraphs 6.4 to 6.7 also detail the following;

- Net completions 2023/24 – 831 homes;
- Planning permissions granted - 12,767 homes;
- Residual need 10,502 homes, to be met by;
 - Rolled over Strategic Sites without planning permission – 3,498 homes; and
 - New site allocations – 8,344 homes.
- Total 25,440 homes.

However in our view Policy SP2 should list and overview the sources of supply within the plan to explain clearly how the housing requirement will be accommodated.

We do not disagree that the standard methodology derived LHN is the correct starting point from which to calculate the housing requirement (as per paragraphs 62 and 69 of the NPPF). The Housing Trajectory at Appendix 3 suggested that a total of 25,796 homes are projected to be delivered between 2023/24 and 2043/44. The sources of supply are as follows;

- Windfall sites – 2,818 homes;
- Strategic Allocations (with permission) – 9,949 homes;
- Strategic Allocations (without permission) – 3,498 homes;
- New Site Allocations – 8,700 homes;
 - Total 25,796 homes.

Firstly, the above breakdown includes 200 homes in 'year 21' from New Site Allocations, i.e. beyond the emerging plan period. The total projected supply for the plan period, as set out within Appendix 3, is 25,596 homes. This should be more clearly set out in the table at Appendix 3.

Secondly, the total number of homes projected to delivery in Appendix 3 differs from the total sources of supply explained at paragraphs 6.4 to 6.7 of the draft plan. Clarity is needed on the number of homes projected to deliver from each source. A full detailed site specific trajectory should be provided setting out all sources of supply for the plan period with an annualised breakdown to set out when each site is projected to commence completions.

In addition, the total projected delivery within the plan period set out at Appendix 3 is only 1,496 homes above the (minimum) LHN figure, just 75 homes per annum above the minimum figure. This reflects a contingency in housing supply of just 6.2% over the plan period. Considering that circa 11% of the projected supply is from windfall sites (i.e. sites assumed to come forward based on assumptions rather than actual identified supply) we consider that insufficient sites have been identified to deliver a realistic prospect of the minimum housing requirement being delivered in the plan period.

To plan to just exceed the LHN by circa 6.2% is not in line with the national requirement to significantly boost the supply of housing. The housing requirement should be expressed as a minimum, and greater contingency needs to be built into the plan to enable adequate sites to be identified to ensure the minimum requirement is met, and to ensure that an adequate five year supply of deliverable homes is maintained over the plan period. The evidence base for the plan demonstrates that the Council is aware; in the Defining Growth section of the Interim Sustainability Report it is acknowledged;

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'. (paragraph 5.4.56)

At present the Council suggest that the vast majority of the requirement will come forward on sites which are existing commitments (Strategic Allocations with and without permission 13,447 homes), and on Windfall sites (2,818 homes). Together these elements comprise 67.5% of the supply. Given the current adopted plan period ends in 2026 it is noteworthy that over 13,000 homes appear to be relied on from Strategic Allocations which are not new to this plan; i.e. they were intended to come forward (we assume at least in part) as part of the delivery in the previous local plan period. Paragraph 6.6 of the draft plan confirms that 3,498 homes are included in the projected supply for the new plan from sites which were allocated for development in the previous plan but have not to date obtained planning permission. This is a clear indication that sites identified in a plan may not come forward as anticipated and that sufficient contingency needs to be built into future projections for delivery.

We do not dispute that these categories (i.e. existing commitments and previously allocated sites) can and should comprise an element of the housing delivery over the emerging plan period, but at present only new sites to meet 8,500 homes within the plan period are even being considered. This places an undue level of certainty that existing

commitments will come forward as planned (particularly when many appear to be rolled over from the previous plan) and, even more difficult to predict, that a significant volume of windfall sites will also come forward.

The over reliance on these sources of supply, without any lapse rate/discount applied to them, compounded with the fact the overall spatial strategy is only planning to just barely meet the LHN without sufficient headroom built in, places the plan in a precarious position where, in our view, it is highly unlikely that the requisite number of homes will actually be delivered within the plan period. The failure to plan to deliver the area's objectively assessed needs as a minimum is contrary to the requirement for the plan to be Positively Prepared (paragraph 36 of the NPPF).

The Technical Review of Housing Needs in Swindon, appended to these representations also concludes that the draft Plan will not provide an effective or deliverable strategy for meeting identified housing needs without additional site allocations, stronger delivery mechanisms, or flexibility in tenure expectations to ensure viability and maximise affordable provision.

Recommendation

The summary of the trajectory at Appendix 3 should be amended to more clearly reflect the homes that will be delivered within the plan period to 2043, and those that are anticipated to deliver beyond the plan period.

A full detailed site specific trajectory should be provided setting out all sources of supply for the plan period with an annualised breakdown to set out when each site is projected to commence completions.

The housing requirement should be expressed as a minimum, and greater contingency needs to be built into the plan to enable adequate sites to be identified to ensure the minimum requirement is met, and to ensure that an adequate five year supply of deliverable homes is maintained over the plan period.

Town Centre Sites and Policy SGL 01 – Swindon's Central Area

Swindon Town is the major settlement within the Borough, and accordingly should be supported in principle as an appropriate location for regeneration, growth and development over the emerging plan period. We support this aspiration and agree that regeneration of this area should be supported by the emerging plan.

However, we consider that the plan as currently drafted significantly overestimates the likelihood that the Town Centre regeneration sites will actually deliver the levels of growth anticipated in the timescales set out. Appendix 1 to the draft plan details a number of sites within the Swindon Central Area, all of which are new allocations and in total consider capable of delivering 4,347 homes in the plan period.

We support in principle the aspiration to regenerate the Town Centre. However this has been an aspiration for some time and there is local evidence that timescales for sites coming forward have slipped continually and that there are a range of complex, site specific issues, including major viability issues, that have caused delays.

The draft plan is accompanied by a Viability Assessment (August 2025, doc 02.03). This considers the proposed site allocations, including brownfield sites in the Town Centre. The report concludes on this matter, at paragraph 12.98, that development of brownfield sites, particularly in the centre of Swindon is challenging, and advises;

If the Council were to follow this advice, it would be necessary to be cautious in relying on brownfield sites in the five year land supply and overall housing trajectory, as the delivery of these is likely to continue to be challenging. It will be necessary to have regard to the progress of brownfield sites through the development management process and/or commitments from site promoters. This may influence the selection of sites for allocation.

It is clear that there are serious challenges to delivering these types of sites in Swindon. The Council's recently published Viability Report directly cautions against relying on delivery from brownfield sites in the town centre as the evidence indicates that they are simply not viable.

If the 4,347 home on new sites within the Central Area were not to come forward in the plan period this would reduce the projected delivery within the plan period to 21,449 homes. This alone would result in the plan being short of the minimum housing requirement over the plan period by 2,651 homes. Even if just a reasonable proportion of them were not to come forward, this could still push the Council below the minimum 24,100 homes. Given the concerns raised around these sites in the Council's own evidence base this is a stark indication of the lack of resilience currently in the plan supply. These town centre sites are just 10 of the 43 new sites proposed to be allocated in the emerging plan. As currently drafted if these were not to come forward as anticipated then even if every other new site identified were to deliver in full, along with all of the existing Strategic Allocations (with and without planning permission currently) and the anticipated level of windfall development were to materialise, the plan would still fail as it would not meet its LHN.

The reliance on the sites within the Central Area, and lack of contingency built into the housing need planned for further emphasises the importance of sites in locations such as Broad Blunsdon such as the Highworth Road site delivering housing within the plan period.

Recommendation

Our recommendation is that in order to ensure the LHN is actually met in the plan period, the plan needs to identify sufficient sites delivering well in excess of this, and to express the figure as a minimum housing requirement throughout the plan.

We suggest that a contingency of circa 10% is built into the housing to be planned for on new allocations, and that a suitable lapse rate is applied to the existing commitments to account for any sites not coming forward as anticipated.

There should also be a critical review of town centre regeneration sites, and their viability and actual ability to deliver new homes in the plan period. Whilst regeneration of these sites should be supported by the Plan, lesser reliance should be placed on them as a key part of the Council's housing delivery strategy (and ability to meet minimum housing requirements).

CHAPTER 9 - AN ENVIRONMENTALLY FRIENDLY SWINDON

SP6 – Climate Stability and the Environment

Policy SP6 sets out the Council's climate change and energy requirements for new development. This includes promoting climate resilience and incorporating adaptation measures and reducing energy demand and carbon emissions.

Delivering climate resilient, low carbon development is key to future development and is supported. The Government's strategy on the Future Homes Standard, as well as requirements set through national guidance and the Building Regulations put in place measures which support climate resilient design and reduce energy demand and carbon emissions. These changes are actively designed to support the UK Net Zero Agenda and 2050 Net Zero target.

The Future Homes Standard, once implemented, will require development to reduce energy demand and carbon emissions, achieving a c.75% carbon reduction beyond Part L 2013. In addition, development will no longer be able to use gas, or any other fossil fuel. The FHS envisages new development will make use of all-electric strategies,

incorporating heat pumps to provide heating and hot water, and supporting the use of Solar PV to provide onsite energy generation.

In 2021 the Building Regulations were updated introducing Part O to require development to assess overheating for homes. This includes consideration of future climate scenarios.

In this context it is considered that Policy SP6 aligns with national guidance and policy and is supported.

CS1: Carbon Reduction and Sustainable Design in new development

Response

Policy CS1 sets out the Council's strategy for carbon reduction and sustainable design in new development. This includes setting a number of sustainable design requirements around climate resilience, making use of zero / low carbon technologies, and enhancing energy efficiency. It also requires development to minimise energy consumption, minimise operational and embodied carbon emissions, and consider the BREEAM Community Standard.

The need for sustainable development and reducing carbon emissions is understood and supported. The Governments FHS, FBS and related updates to the Building Regulations and other guidance, i.e. the use of climate change allowances in assessing flood risk provide a basis for delivering sustainable, climate resilient, and low carbon development.

In setting out this policy regard should be given to the December 2023 Written Ministerial Statement (WMS) which sets out clarity on the development and application of local energy efficiency standards in the context of advancing national policy. The WMS notes that the introduction of Part L 2021 supersedes the 2015 WMS which set guidance for Local Authorities to not set energy efficiency standards beyond Code for Sustainable Homes Level 4. The WMS goes on to note that the 2025 Future Homes Standard (FHS) will mean, 'that homes built to that standard will be net zero ready and should need no significant work to ensure that they have zero carbon emissions as the grid continue to decarbonise. Compared to varied local standards, these nationally applied standards provide much-needed clarity and consistency for businesses, large and small, to invest and prepare to build net-zero ready homes'.

The WMS states, 'the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale.'

In this context elements of this policy which require development to 'minimise' emissions in relation to operational emissions and embodied carbon, setting out open ended requirements which contradicts the WMS and FHS requirements on operational emissions.

There are also implications on viability as an open-ended statement such as this is open to interpretation which is unlikely to have been fully considered at this stage. The Future Homes Hub report, Ready for Zero, prepared to inform the 2025 FHS sets out costs for a range of potential specifications to reduce operational emissions. 'Minimising carbon emissions' could result in significant additional costs. The Viability Assessment which accompanies the Plan sets out additional costs for scenarios beyond the FHS, and scenario CCS4, drawing on the Future Homes Hub reporting which includes, 'minimising space and water heating', is estimated to increase costs by c.19% beyond current Part L Regulations. Similarly in setting a requirement to 'minimise embodied carbon'

leaves an open-ended requirement which could add significant cost to development and is not considered as part of the current viability assessment.

The evidence base includes the Swindon Carbon Inventory which provides background information to support the Plan. The Carbon Inventory sets out the baseline emissions for Swindon and evidence for setting local targets and integrating climate objectives into the Local Plan. While the Carbon Inventory identifies the scale of local emissions and challenges in reducing carbon emissions limited information is provided on the application of policy to reduce emissions from new development. No analysis has been included at this stage on potential interventions, alignment with the FHS and WMS, or including embodied carbon requirements.

In addition to the energy and carbon requirements noted above the Policy also includes requirements for non-residential development to achieve a BREEAM Excellent rating, and for residential development to consider the BREEAM Communities scheme. The use of BREEAM to assess non-residential development is well understood and supported, however, currently the evidence base does not reference BREEAM, and the viability assessment does not take account of the recent BREEAM update. Version 7 of the BREEAM New Construction manual has recently been released and is expected to increase the requirements to achieve Excellent, in this context further analysis of costs is required to determine if this is suitable. With regards to the BREEAM Communities scheme this was first published in 2012 and while still available doesn't align well with changes in national guidance and policy. Furthermore, no consideration is given to this scheme as part of the current evidence base or viability assessment.

Any policies which go beyond the requirements of the Building Regulations need to be supported by an appropriate evidence base and costs included in the viability assessment. Until this is completed elements of the Policy as currently written are not considered to align with the requirements of the NPPF.

Recommendations

Sustainable Design

1. Proposals for development, proportionate to their nature and scale, should:

- a. be able to withstand predictable expected effects from climate change for their expected lifetime,*
- b. take into consideration future climate uncertainty through adaptable and resilient design approaches that allow for long-term environmental change,*
- c. utilise the latest zero/low carbon technologies,*
- d. ~~achieve the highest viable~~ enhance levels of energy efficiency where feasible and viable, and*
- e. include flexibility in layout, infrastructure, and built form to enable future adaptation over the lifespan of the development.*

Carbon Reduction

2. Development proposals should:

- a) ~~minimise~~ reduce the energy consumption of the development by incorporating measures to reduce the impact of overheating/cooling and mitigate heat traps within the development including through a fabric-first approach, and*
- b) ~~minimise~~ reduce operational and embodied carbon emissions in the construction of development beyond current practice where feasible and viable;*

3. All major non-residential developments are expected to achieve BREEAM excellent standards where feasible and viable.

4. All major residential-led mixed-use developments ~~will be required~~ should consider sustainability certification ~~BREEAM—Community standards or any other relevant building efficiency standards~~ with the clear focus on resolving overall sustainability of the area.

CSE2: Whole Life Carbon Assessments (WLCA)

Major development proposals over 49 units, or 4,999 m2 of floorspace are required to undertake whole life-cycle carbon assessments to support their proposals

WLCA should be undertaken using the RICS Professional Standard as applicable at the time of the application and any applicable assessment template.

Policy CSE2 sets out a requirement for major development proposals to undertake a Whole Life Carbon Assessment (WLCA) as part of proposals, using the RICS methodology. Typically, this would require the assessment of the upfront embodied carbon operational emissions, maintenance and end of life of each building proposed.

It is understood that as the FHS is introduced and development switches to electricity-based strategies the upfront embodied carbon of development remains a significant proportion of a development's lifetime carbon emissions. Understanding the upfront embodied carbon and reducing this is therefore a key consideration and undertaking a WLCA is supported.

However, it should be noted that undertaking a WLCA requires detailed information of house types proposed and is therefore only likely to be applicable for Full, or Reserved Matters applications, there will be insufficient information at the outline stage to provide a meaningful assessment. Furthermore, undertaking and WLCA increases costs and should only be undertaken on proposed house types, allowing an assessment to be made of the development as a whole as part of a proportionate approach. It is also not appropriate to consider maintenance and end of life emissions; these are ultimately a function and responsibility of the building owner. We would recommend that this policy focuses on the upfront embodied carbon of new development (Stages A1-A5), i.e. the materials and construction carbon which can be influenced by the developer.

It is noted that the viability assessment incorporates this policy into the assessment of Policies SP6 and CSE1, however, no direct cost allowances has been included for the preparation of a WLCA, the policy needs to be updated, and a cost considered.

Recommendations

- 1. Major development proposals over 49 units, or 4,999 m2 of floorspace are required to undertake whole life-cycle carbon assessments, focussing on upfront embodied carbon (Stages A1-A5) to support their proposals*
- 2. WLCA should be undertaken using the RICS Professional Standard as applicable at the time of the application and any applicable assessment template.*

CHAPTER 10 – A HEALTHY, SOCIALLY CONNECTED SWINDON

U1: Wastewater, Sewage Infrastructure and Water Supply

Policy U1 sets out requirements to ensure adequate water supply is available, as well as sewage capacity. It also sets out water efficiency requirements and rainwater harvesting and greywater use considerations.

As noted, it is acknowledged that Swindon is in an area of severe water stress and consideration needs to be made to ensure there is adequate infrastructure capacity, as well as giving consideration to measures to reduce capacity demand.

Alignment with the Building Regulations higher water efficiency standards for homes is supported, as is the provision of water butts in private outdoor space where this is feasible.

However, the requirements of part 10, which requires major residential development to incorporate rainwater harvesting and greywater recycling unless unviable or unfeasible is not considered suitable.

While the Water Cycle Study prepared to support the Plan considers measures to reduce water consumption in line with the higher efficiency target of 110l/p/d, and beyond, the Viability Assessment only considers the 110l/p/d target. Delivering rainwater harvesting and greywater use requires additional consideration as to whether this is feasible for residential development, and if this is viable.

The Viability Assessment references the Future Homes Hub prepared the Water Ready report to inform the Government's roadmap for water efficiency new homes. This provides further context on enhanced water efficiency standards and potential costs for incorporating rainwater harvesting and greywater use at £1,000 - £3,350 for residential development. The viability assessment only includes an uplift cost of £7 per dwelling. The requirement to match minimum drought frequency has also not been adequately considered and is not likely to be suitable.

We would note that the introduction of rainwater harvesting, and grey water is also likely to have impacts on internal space, occupier maintenance and increasing occupier costs. The need for additional space should be considered in the context of other design requirements, including the requirements of Policy CS1 which would also have internal space requirements for ventilation systems as it is currently written.

We would note that the Government is currently consulting on Water Efficiency Standards which is considering lowering the optional higher target to 100l/p/d and would recommend that the policy is linked to the outcome of that consultation and review of the Building Regulations.

Recommendations

8. All new residential developments should be designed so that water use does not exceed 110 l/person/day, or subsequent updates to the Building Regulations higher water efficiency standard. To demonstrate compliance with the requirements, applications must be set out the estimated water consumption of the proposal using the 'Water Efficiency Calculator' template.

10. On major residential developments, and commercial developments over 4000m³, water re-use technologies for rainwater harvesting and greywater recycling, or other water use technology are required unless unviable or unfeasible on the site should be considered where feasible and viable. Rainwater harvesting systems should be designed to meet a minimum drought frequency standard.

U3: Energy Networks

Policy U3 reiterates part of Policy SP1 requiring grid capacity is available and also requires major development to consider on-site renewable and / or sustainable solutions.

The importance of capacity for development is understood. However, and noted connection capacity may be conditional on timescales set out by SSEN, connection capacity will be secured for development but may not be available until a specific date. Planning permission should not be held up until capacity is in place.

The introduction of the FHS will require development to incorporate low carbon renewable energy and sustainable on-site solutions.

The objectives of this policy are supported.

LAND SOUTH OF HIGHWORTH ROAD

The allocation of Land south of Highworth Road for an 'indicative constrained residential yield' of 89 residential units is supported. The eastern part of the site is owned by our client and a sketch plan has been prepared which illustrates how both residential development of approximately 50 dwellings and a community facility in the form of a new gospel hall can be accommodated on the Site. The western part of the site is under separate ownership, however both parts of the proposed allocation are capable of being implemented individually, as they are separated by a significant tree belt.

The allocation of several small and medium residential sites such as Land south of Highworth Road in Appendix 1 is considered essential to the Council meeting its housing requirements over the plan period. In addition, the allocation of such sites which can deliver housing early in the plan period and quickly contribute to the Council's housing land supply is highly beneficial.

As already discussed above, we consider there is an over reliance on the strategic allocations and redevelopment within the Swindon Central Area in the SLP, and a more balanced approach to residential allocations incorporating a greater number of smaller and medium sized green field sites across a broad range of locations is required. This further emphasises the importance of sites such as Land south of Highworth Road coming forward.

As already discussed above, the Site is in a sustainable location, adjacent to the Blunsdon settlement boundary. It is in close proximity to the facilities and services located within Blunsdon, including the Church, Primary School, GP Surgery, Parish Hall, the Blunsdon House Hotel and Leisure Club, the Heart in Hand Pub, Premier Inn hotel and Cold Harbour public house. The site is served by public transport, with the nearest bus stop located less than 100 metres from the site on Broad Bush (B4019). This provides services to Orbital Shopping Park and central Swindon. Regular rail services can be accessed from Swindon Rail Station.

The site is also within close proximity to the Kingsdown Strategic Allocation within which a local centre including retail, nursery, primary school, and sports will be provided, alongside significant infrastructure improvements. The Highworth Road site will therefore also have improved access to local facilities as the Kingsdown Strategic Allocation's local centre is developed.

The site does not have any overarching constraints. The site is not susceptible to flooding and there are no known archaeological constraints. The site is not within 400m of an SSSI, SPA or Ramsar site. There are no Listed Buildings on, or within in close proximity to, the site, nor is the site within a Conservation Area. There are no public rights of way running through the site. There is a high pressure water main that crosses the site, and this has an easement which will be taken into account through the site layout. Suitable and safe vehicular access would be achieved via a simple T- simple priority T-junction formed at Broad Bush (B4019).

The site benefits from strong existing tree and hedgerow belts along the eastern and western boundaries and further to the south as part of the wider landholding. These provide an effective screen shielding the site from views from the surrounding countryside including that which will become the Kingsdown Strategic Allocation. The hedgerow along the site's northern boundary facing towards the B4019 is much shorter than elsewhere and establishes a stronger visual link with the existing built form of Blunsdon. Consequently, the site very much reads as part of the form of Blunsdon rather than Kingsdown.

The allocation of Land south of Highworth Road is strongly supported. This is a sustainable location for development with no environmental or technical constraints. The allocation of small and medium residential sites like this that can be delivered quickly across the Borough will assist the Council in meeting its housing requirement,

and ensure the plan is positively prepared. However, the policy should also contain sufficient flexibility to allow for the provision of a community use in the form of a gospel hall on the site, in addition to residential development as this is an excellent opportunity to provide an additional community facility within Blunsdon.

CONCLUSION

In summary, these representations have been prepared on behalf of our client, the owner of the Highworth Road site. The allocation of the wider site at Land south of Highworth Road for residential development is supported, however the allocation should also include provision for community uses.

These representations also make several comments in relation to emerging policies on the spatial strategy, housing requirement and the sustainability policies which should be taken into account by the Council.

If you have any questions about these representations or wish to discuss them further please do not hesitate to contact me. In the meantime I would appreciate it if you could please confirm safe receipt of these representations. We would also wish to confirm that we should continue to be kept informed of the progress of the emerging SLP 2043.

Yours faithfully

Peter Lawson
Senior Director

On behalf of Turley (Reading)

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Appendix 1: Technical Critique of the Housing Needs Position in Swindon

Technical Review of Housing Needs in Swindon

October 2025



Turley

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1. Introduction

- 1.1 Swindon Borough Council ('the Council') is currently undertaking a Regulation 18 consultation on a draft of its new Local Plan¹ ('the draft Plan'). This is intended to cover the period from 2023 to 2043 and will ultimately replace the existing Local Plan, which was adopted in March 2015².
- 1.2 Turley has been jointly commissioned by several clients to review the emerging approach towards housing provision, to ascertain whether the proposed strategy is likely to meet both the overall need for housing – acknowledging that this could be higher than suggested as only a minimum by the standard method – and the specific need for affordable housing.
- 1.3 This review is structured as follows:
- **Section 2 – Context for the New Local Plan** – an assessment of how successfully the growth envisaged by the existing Local Plan has actually been delivered and had an impact, where this provides important context for its replacement;
 - **Section 3 – Introducing the Council's Proposed Approach** – an introduction to the proposed housing requirement, the identified land supply and the Council's expectations around affordable housing;
 - **Section 4 – Economic Implications** – consideration of the level of job growth that could be supported through planned housing growth;
 - **Section 5 – Implications for Affordable Housing** – an assessment of the amount of affordable housing that could realistically be delivered by the identified sites, relative to the evidenced need; and
 - **Section 6 – Summary and Conclusions** – a concise overview of the report's findings and their implications for the Council as it continues to develop a new Local Plan.

¹ Swindon Borough Council (September 2025) Swindon Local Plan 2023-2043: Regulation 18 consultation draft

² Swindon Borough Council (March 2015) Swindon Borough Local Plan 2026

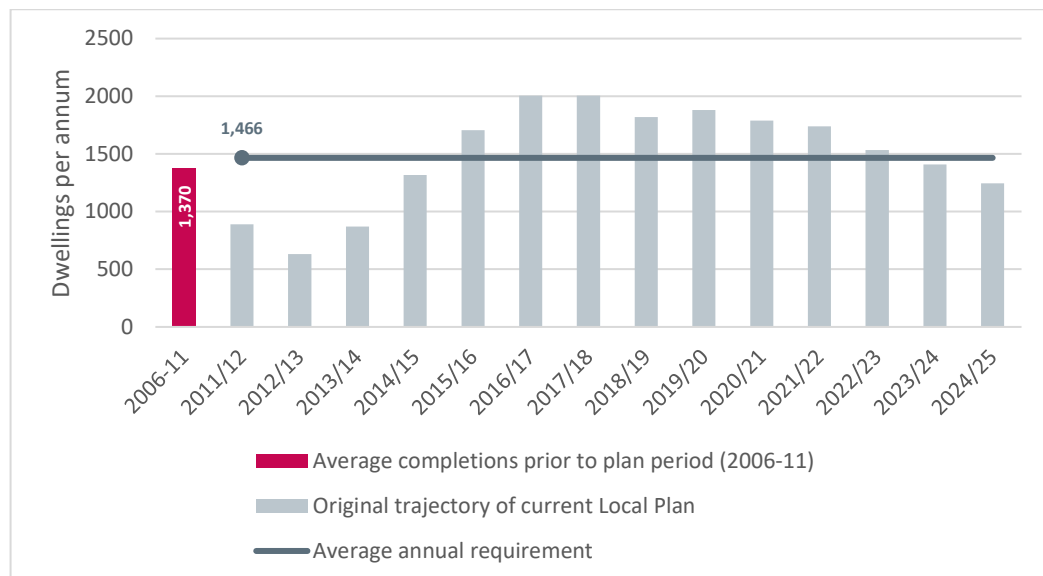
2. Context for the New Local Plan

- 2.1 The new Local Plan will evidently follow the existing one³ – adopted in March 2015 – making it relevant to consider how successfully the growth planned therein, for the period from 2011 to 2026, has actually been delivered.

Housing delivery falling short

- 2.2 The existing Local Plan set a requirement for 1,466 dwellings per annum over the period from 2011 to 2026, in doing so aiming to boost delivery by around 9% where an average of 1,370 homes were reported to have been completed during the prior five years⁴ (2006-11). The appended housing trajectory shows how delivery was intended to gradually rise during the early years of the plan period, peaking when around 2,000 homes were to be completed both in 2018/19 and 2019/20⁵.

Figure 2.1: Adopted Requirement and Intended Housing Trajectory



Source: Swindon Borough Council; MHCLG

- 2.3 While the Council unusually admits to there being a lack of ‘*information on the total number of dwellings delivered since the start of the plan period*’, it does appear to have reported completions in all but three years⁶ (2020-23). Using Government data to fill this gap suggests that circa 12,662 homes have been completed throughout Swindon during the current plan period, up to 2025, at an average rate of around 905 dwellings per annum⁷. This is some 38% short of an adopted requirement that appears to have not

³ Swindon Borough Council (March 2015) Swindon Borough Local Plan 2026

⁴ *Ibid*, paragraphs 3.23 and 3.24

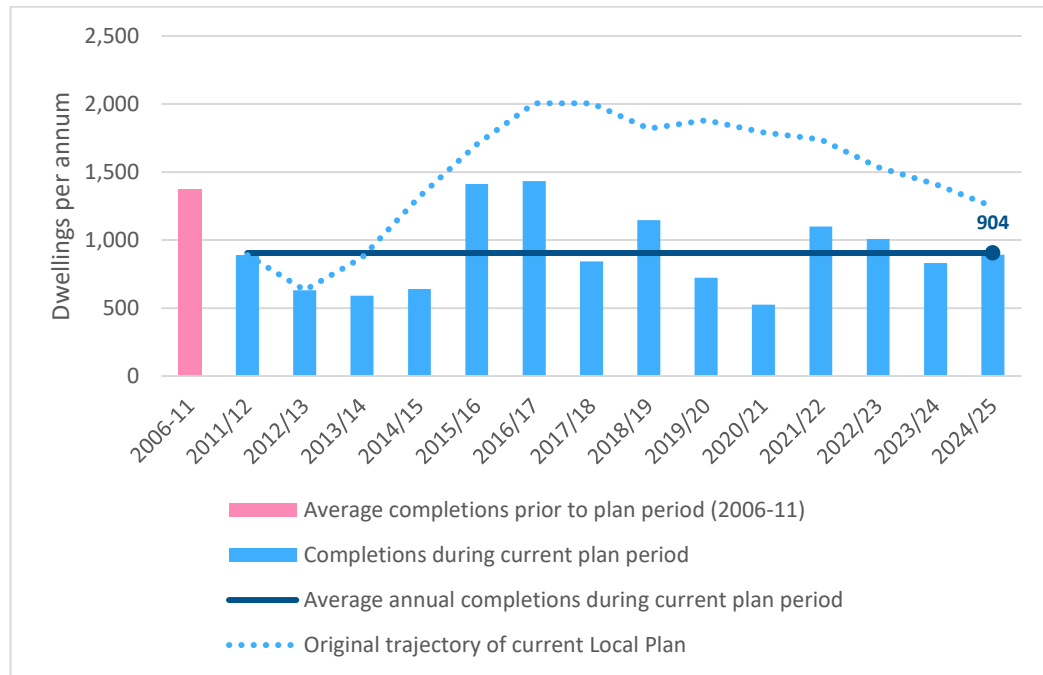
⁵ *Ibid*, Appendix 5

⁶ *Ibid*, p61; Swindon Borough Council (September 2025) Authority Monitoring Report 2024-2025, paragraph 2.1.3; Swindon Borough Council (April 2020) Housing Completions Monitoring Report, Table 1

⁷ Ministry of Housing, Communities and Local Government (November 2024) Table 122: housing supply; net additional dwellings, by local authority district, England

been met even once since adoption, with delivery having consistently been lower than envisaged in the trajectory and no more than 1,434 homes having reportedly been completed in any single year. The effect has been to reduce the prior rate of delivery by roughly a third (34%) rather than boosting it, by the intended 9%.

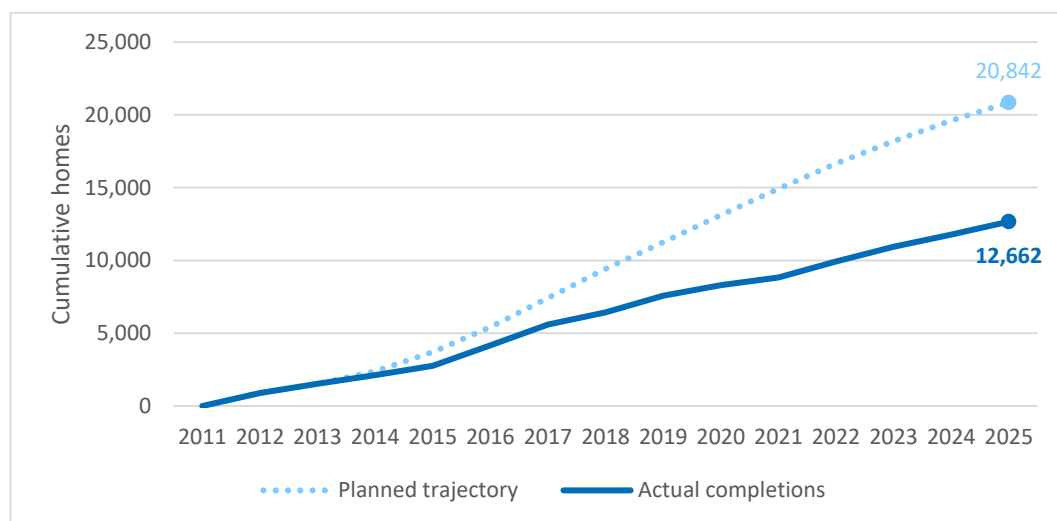
Figure 2.2: Completions vs. Previous Delivery and Planned Trajectory



Source: Swindon Borough Council; MHCLG; Turley analysis

2.4 Figure 2.3 further illustrates how delivery has cumulatively fallen short of the trajectory, to the extent that only around three of every five planned homes have been delivered as of 2025.

Figure 2.3: Cumulative Delivery to Date vs. Trajectory (2011-25)

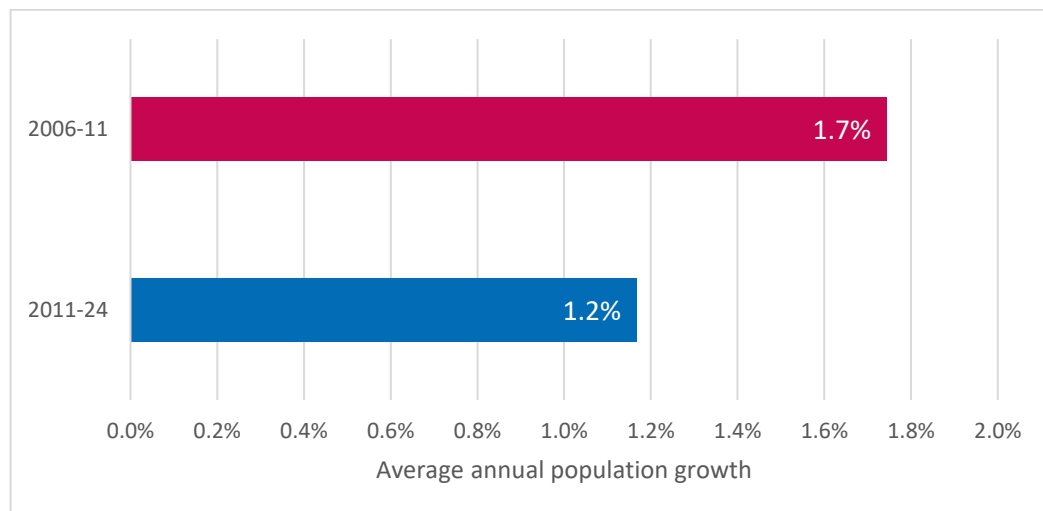


Source: Swindon Borough Council; MHCLG

Slowing population growth

- 2.5 The population of Swindon has still been able to grow, even with the delivery of fewer homes than planned, but this underperformance is likely to at least partly explain why the *rate* of growth has slowed.
- 2.6 According to official estimates developed by the Office for National Statistics⁸ (ONS) the population of Swindon was growing at an average rate of 1.7% per annum over the five years prior to the current plan period, during which an average of 1,370 homes were delivered annually.
- 2.7 While estimated only up to 2024 at the time of writing, the population is estimated to have since grown at a markedly lower rate of 1.2% per annum. This is roughly a third slower (33%) so effectively mirrors the aforementioned 34% decline in housing completions⁹.

Figure 2.4: Average Annual Population Growth Prior to and During Plan Period



Source: ONS

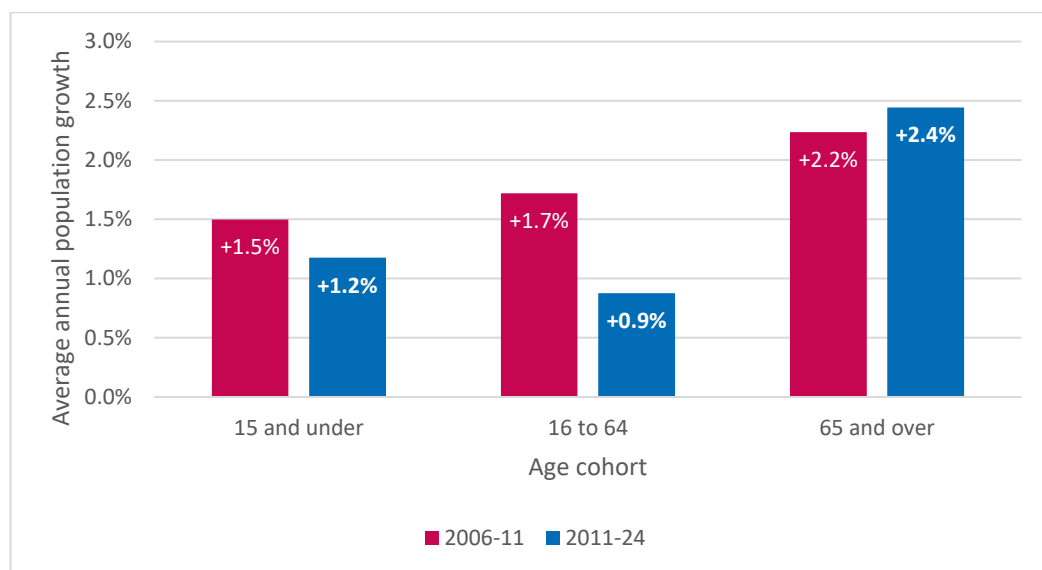
- 2.8 The slowdown has been even more pronounced for the working age population, aged 16 to 64. While this too was previously growing at a rate of 1.7% per annum over the five years to 2011, it has since grown barely half as quickly at an average rate of only 0.9% per annum¹⁰. The ageing of the population has though continued apace, with indeed there having been a slight acceleration in the rate at which the older population – aged 65 and above – has grown.

⁸ ONS (2025) Population estimates – local authority based by single year of age

⁹ This figure applies to both the plan period to date (2011-25) and the slightly shorter period to 2024, for which official population estimates are available

¹⁰ ONS (2025) Population estimates – local authority based by single year of age

Figure 2.5: Benchmarking Average Annual Population Growth by Age Cohort



Source: ONS

Limited job growth

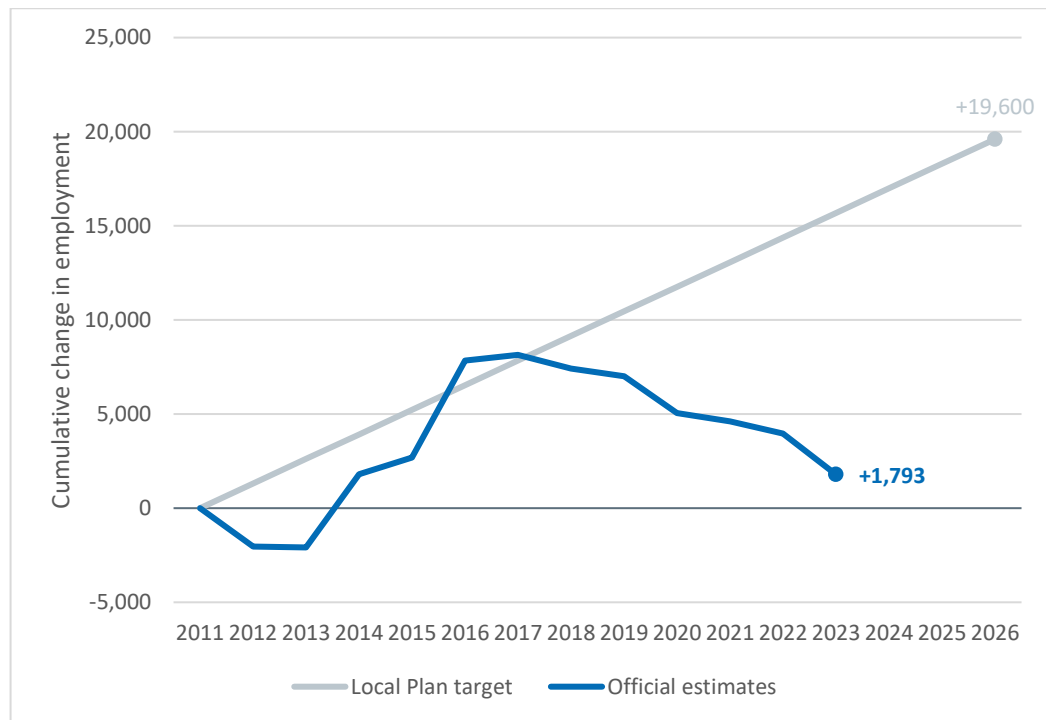
- 2.9 The slowing growth of the working age population will have likely squeezed the local labour market, with the near-halving of the unemployment rate a further sign of the growing lack of latent labour in Swindon¹¹.
- 2.10 This will have almost certainly contributed towards the borough's relatively poor economic performance. While the Local Plan set what the examining Inspector described as an '*aspirational but achievable*' target of creating 19,600 jobs over the plan period, at an average rate of circa 1,307 jobs per annum, official estimates suggest that it has created fewer than 1,800 jobs *in total* during the years currently reported¹² (2011-23).

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¹¹ ONS (2025) Model-based estimates of unemployment. This indicates that the unemployment rate in Swindon stood at 8.8% at the start of the current plan period in 2011, but only 3.8% by 2024

¹² Swindon Borough Council (March 2015) Swindon Borough Local Plan 2026, paragraph 3.17; Planning Inspectorate (February 2015) Report on the Examination into the Swindon Borough Local Plan, paragraph 53; ONS (2024) Business Register and Employment Survey: public/private sector, open access

Figure 2.6: Cumulative Job Growth in Swindon vs. Local Plan Target



Source: Swindon Borough Council; Business Register and Employment Survey

- 2.11 Such limited job growth – increasing employment levels by only 2% since 2011 – has made Swindon the worst performing economy of its size in the South West, at least on this measure¹³. Aside from the very small Isles of Scilly, only Torbay – which had less than half as many jobs to begin with – and the Forest of Dean, with less than a quarter, have created jobs at a slower rate than Swindon since 2011.

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¹³ ONS (2024) Business Register and Employment Survey: public/private sector, open access

Figure 2.7: Comparing Proportionate Employment Growth in the South West



Source: BRES; Turley analysis

Worsening affordability

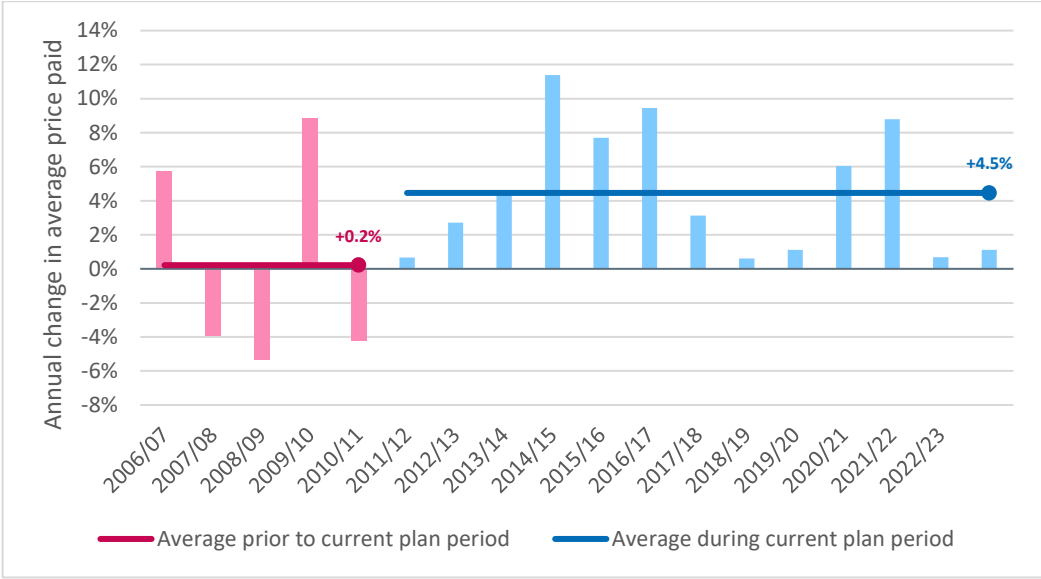
- 2.12 Failure to deliver planned housing growth in Swindon appears to have also put pressure on house prices, which are widely acknowledged to provide an indication of the balance between supply and demand¹⁴.
- 2.13 Data published by the Land Registry indicates that the average price paid for housing in Swindon barely grew in the five years prior to the current plan period, rising by an average of only 0.2% per annum¹⁵. Prices have though grown by an average of around 4.5% per annum – over twenty times faster – since 2011.

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¹⁴ PPG Reference ID 61-018-20190315; MHCLG (August 2024) Proposed reforms to the National Planning Policy Framework and other changes to the planning system

¹⁵ Land Registry (2025) Price paid data

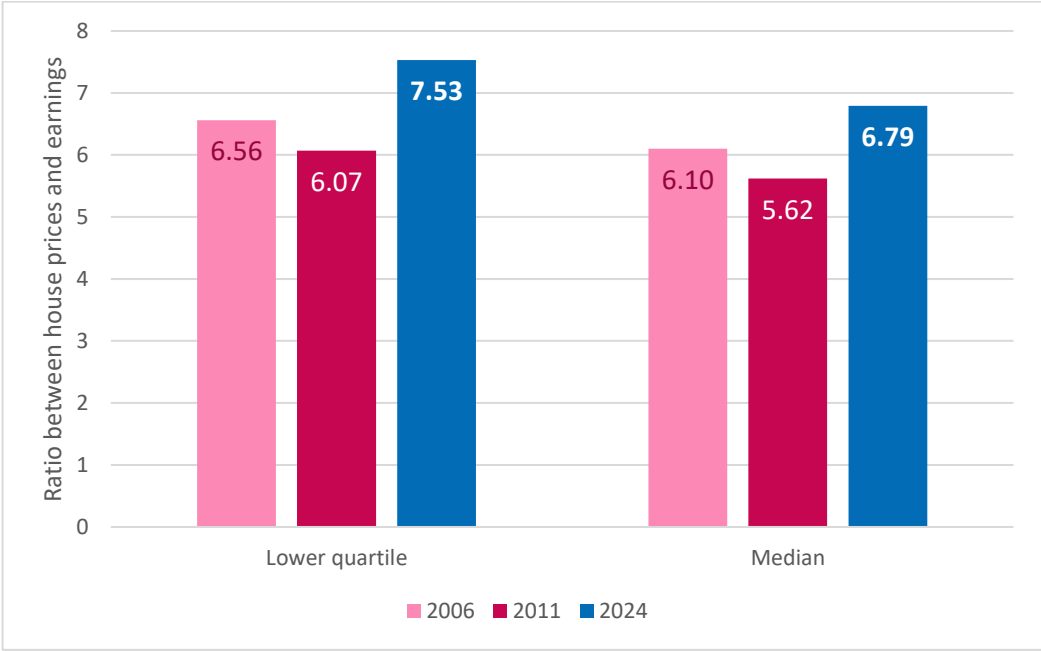
Figure 2.8: Annual Change in the Average Price Paid for Housing in Swindon



Source: Land Registry; Turley analysis

2.14 The ONS monitors how such price growth affects the affordability of housing at both the entry level and midpoint of the market, when taking account of earnings¹⁶. It found affordability to have slightly improved in the years prior to the plan period, at both levels, but this was not sustained with a pronounced worsening having been seen since 2011.

Figure 2.9: Lower Quartile and Median Affordability Ratios for Swindon

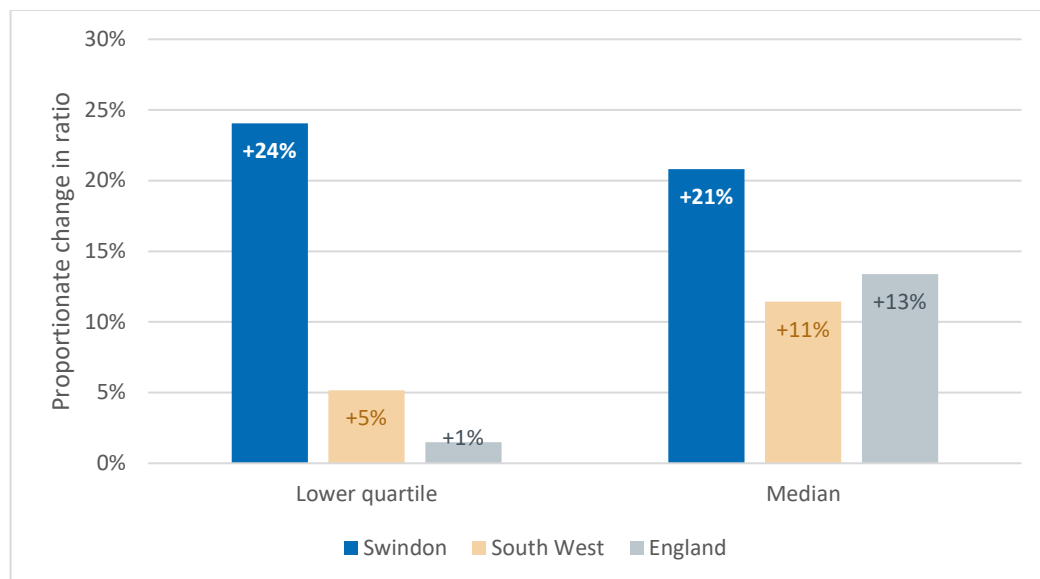


Source: ONS

¹⁶ ONS (March 2025) House price to workplace-based earnings ratio

- 2.15 The extent of this worsening of affordability since 2011 is particularly notable for having surpassed what was seen both regionally and nationally.

Figure 2.10: Comparing Proportionate Change in Affordability Ratios (2011-24)



Source: ONS

Few new affordable homes

- 2.16 Delivery in the five years prior to the current plan period is reported to have enabled the delivery of circa 387 affordable homes annually, in gross terms¹⁷. Some 34 such homes were though also lost annually through Right to Buy, meaning that in net terms around 353 affordable homes were provided on average during these five years¹⁸.
- 2.17 The subsequent slowdown in overall delivery appears to have had a particular effect on affordable housing supply, since barely a third as many – only 143 gross¹⁹ – are reported as having been completed annually on average since 2011. Right to Buy losses have simultaneously increased by around half, to an average of 52 per annum, such that only 88 net additional affordable homes have been provided each year on average during the current plan period²⁰. This is some 75% fewer than were being provided previously.

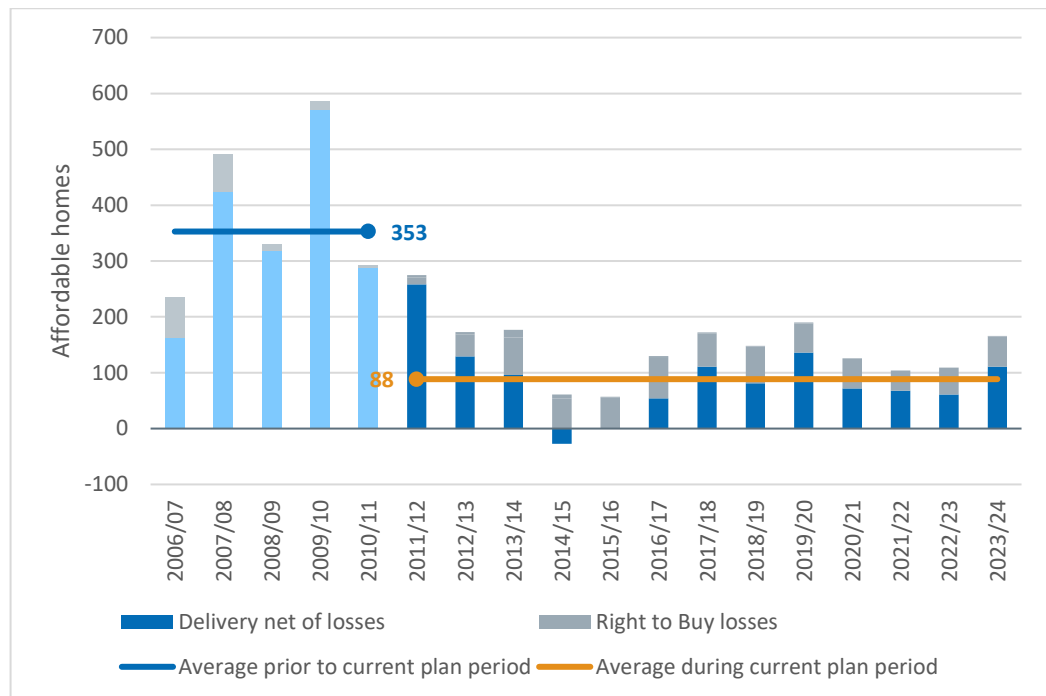
¹⁷ MHCLG (June 2024) Live Table 1008C: Total additional affordable dwellings provided by local authority area – completions

¹⁸ MHCLG (August 2025) Table 691 annual: Right to Buy sales, by local authority

¹⁹ MHCLG (June 2024) Live Table 1008C: Total additional affordable dwellings provided by local authority area – completions

²⁰ MHCLG (August 2025) Table 691 annual: Right to Buy sales, by local authority

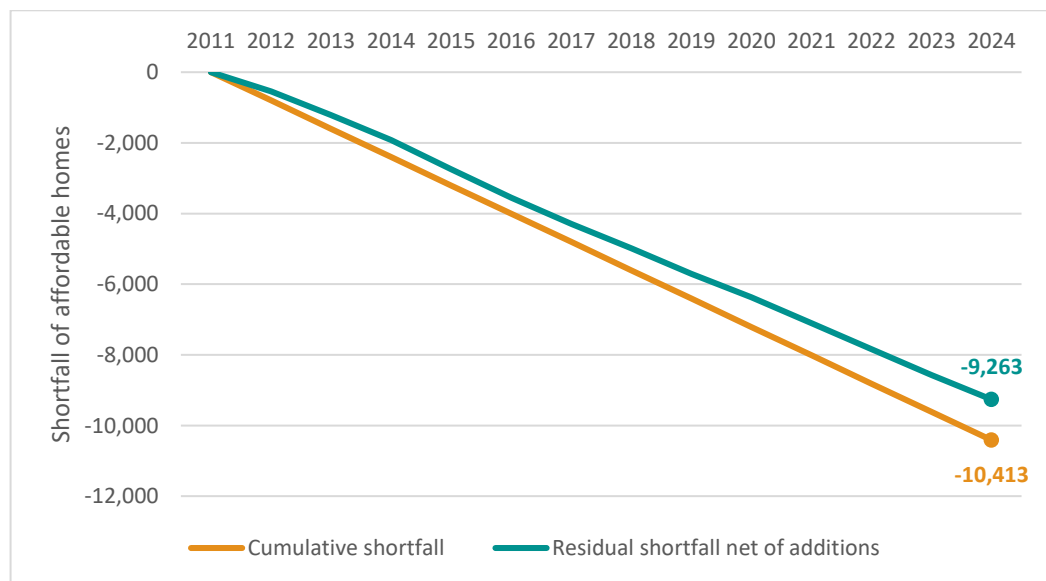
Figure 2.11: Affordable Housing Delivery and Losses through Right to Buy



Source: MHCLG

- 2.18 Net delivery since 2011 has therefore been sufficient to clear only 11% of what the existing Local Plan describes as ‘an annual average shortfall...of around 801 affordable homes’.

Figure 2.12: Cumulative Shortfall of Affordable Housing



Source: Swindon Borough Council; MHCLG; Turley analysis

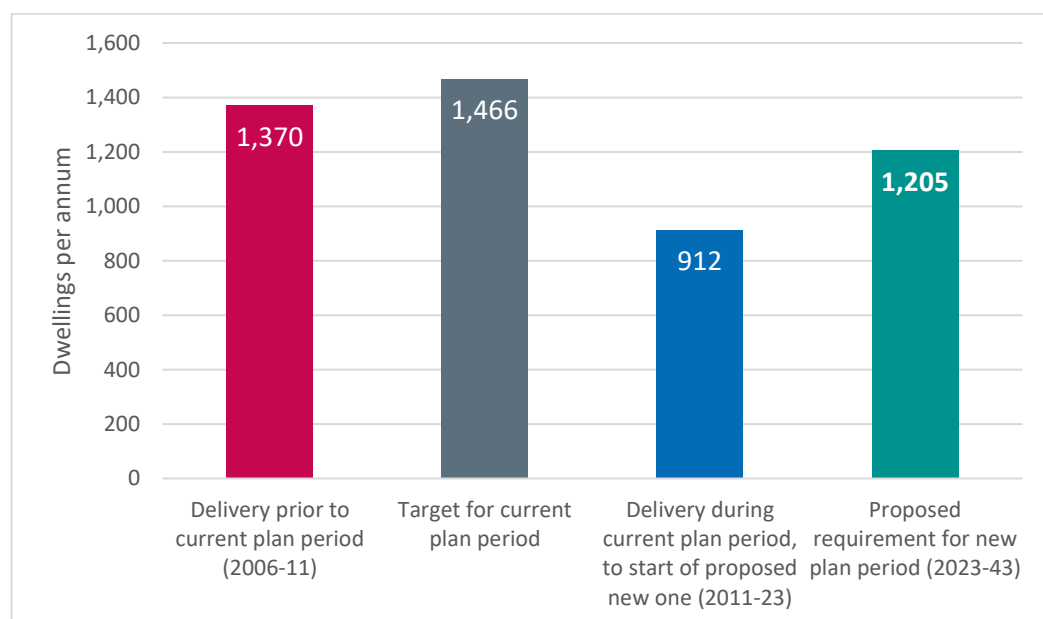
Summary

- The success or otherwise of the existing Local Plan, adopted in March 2015, provides **important context** for its replacement.
- While the Council implicitly sought to boost the housing delivery seen immediately prior to the current plan period, over five years to 2011, the average annual completions rate has ultimately **reduced by a third** with the annual requirement having not been met even once.
- This is likely to at least partly explain why **population growth has slowed** since 2011, again by around a third, with the rate of growth in the core working age population also having nearly halved.
- This will have put pressure on a local labour market that was already being squeezed by a near halving of the unemployment rate, potentially at least partly explaining why the borough has so far **created fewer than 1,800 of the 19,600 jobs targeted** by the existing Local Plan. Such limited job growth has notably made Swindon the worst performing economy of its size in the South West.
- Failure to deliver planned housing growth has also put **pressure on house prices**, which were barely rising prior to 2011 but have since grown by an average of 4.5% per annum. This has made housing less affordable relative to earnings, at both the midpoint and entry level of the market, with a more pronounced worsening than has been seen either regionally or nationally.
- Recent delivery also appears to have enabled the provision of **fewer affordable homes**, barely a quarter as many of which have been provided since 2011 when accounting for the growing number of losses through Right to Buy. Net additions have been sufficient to clear only 11% of the shortfall that has accumulated over the plan period to date.

3. Introducing the Council's Proposed Approach

- 3.1 While the existing Local Plan sought – though has ultimately failed – to meet an objectively assessed need for housing in Swindon, in line with policy and guidance at the time it was prepared, its replacement is being produced in the context of a National Planning Policy Framework (NPPF) that now requires use of a standard method to ‘*determine the minimum number of homes needed*’²¹. This was first introduced for plan-making in January 2019 but the method itself has been revised on several occasions since, most recently in December 2024.
- 3.2 The method at that point suggested a need for **at least 1,205 dwellings per annum** in Swindon, and it is seemingly with this that the Council is proposing to align in its setting of a housing requirement for the new Local Plan²². It confirms that this equates to 24,100 homes in total over what is proposed to be a twenty-year plan period (2023-43).
- 3.3 Such a target would be almost a third (32%) higher than the delivery that has been seen during the current plan period but it would still be around 12% short of what was being delivered previously, and nearly a fifth (18%) below what the existing Local Plan sought to deliver.

Figure 3.1: Benchmarking Proposed Housing Requirement



Source: Swindon Borough Council; MHCLG; Turley analysis

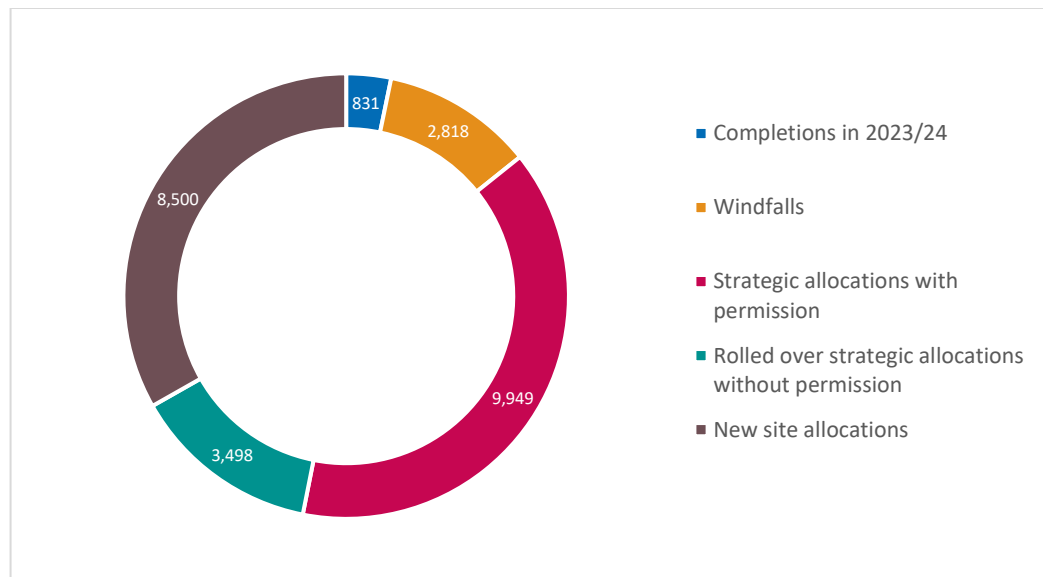
- 3.4 The Council assumes that existing planning permissions will meet more than half of the identified need, adding to homes that are known to have already been completed in the

²¹ MHCLG (December 2024) National Planning Policy Framework, paragraph 62

²² Swindon Borough Council (September 2025) Swindon Local Plan 2023-2043: Regulation 18 consultation draft, Policy SP2 and paragraph 6.4

first year of what is proposed to be the new plan period²³. It aims to meet the residual need by rolling forward five strategic sites from the existing Local Plan that do not have planning permission, and by allocating 33 further sites²⁴. It claims that this supply plus windfalls could enable the delivery of some 25,596 homes in total, providing a ‘buffer’ beyond the identified need²⁵.

Figure 3.2: Composition of Proposed Supply (2023-43)



Source: Swindon Borough Council

- 3.5 The Council envisages at least 30% of the homes delivered through ‘*major residential development*’ being affordable, and claims that there is ‘*a local need*’ for 78% of these to be at social rent²⁶.
- 3.6 It expects any such homes that are provided to be of ‘*sizes that reflect local housing need in accordance with the latest Local Housing Needs Assessment*’²⁷. An annex to the latest such document – produced in June 2025 and summarised within the draft Plan²⁸ – suggests that a relatively balanced mix of social and affordable rented homes will be needed, whereas larger market and shared ownership homes are implied to be required.

²³ *Ibid*, paragraph 6.5

²⁴ *Ibid*, paragraph 6.6 and Appendix 3

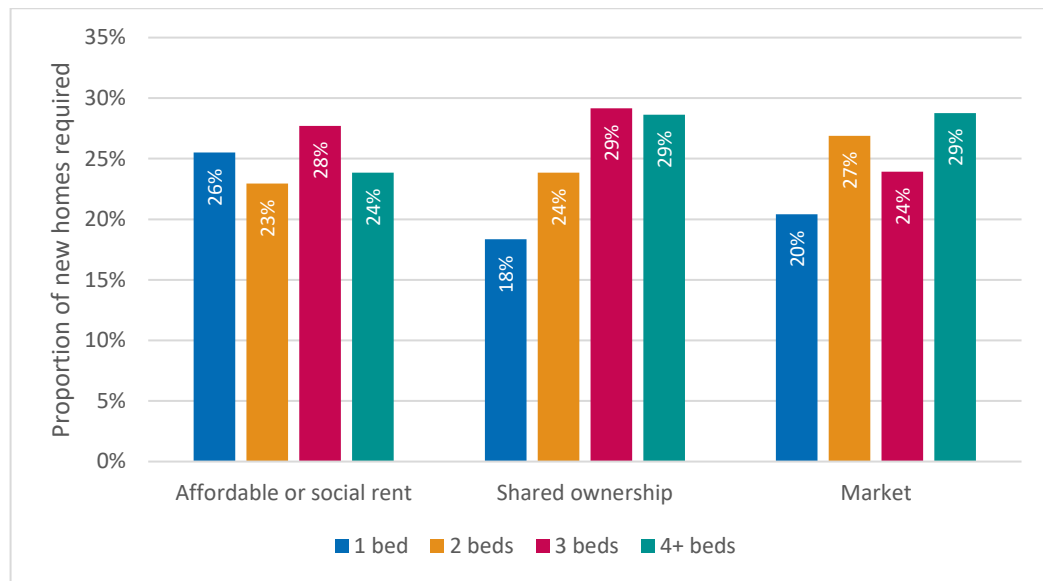
²⁵ *Ibid*, Appendix 3

²⁶ *Ibid*, p53

²⁷ *Ibid*, p52

²⁸ *Ibid*, Figure 3; HDH Planning and Development (October 2024) Swindon Local Housing Needs Assessment

Figure 3.3: Mix of Unit Sizes Identified as Needed in Swindon (2023-43)



Source: HDH Planning and Development

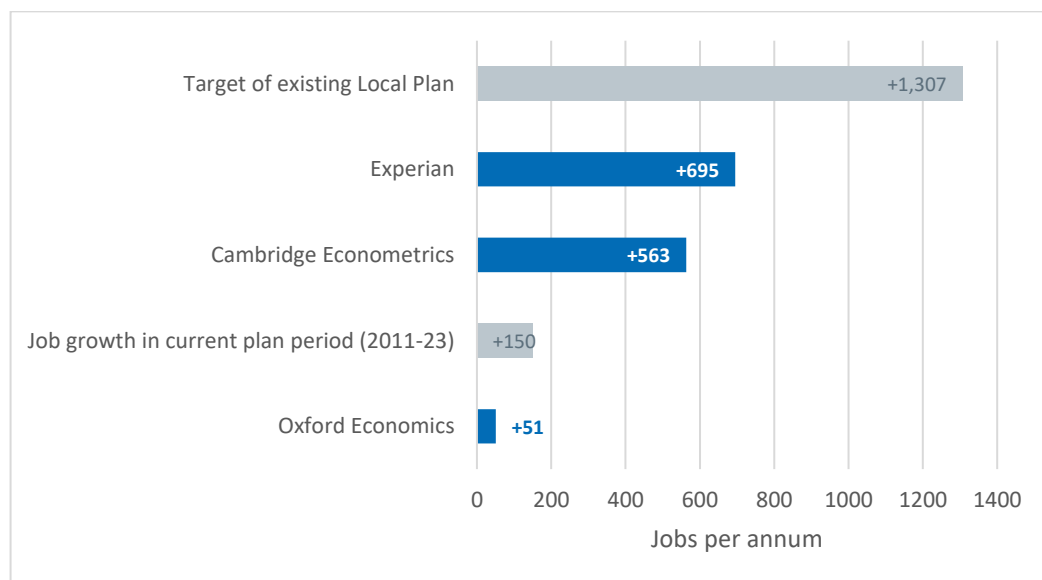
Summary

- The Council has rightly used the standard method to determine that **at least 1,205 dwellings per annum** are needed in Swindon, and it is this that is proposed to form the basis for the housing requirement of the new Local Plan.
- Although such a target would be almost a third higher than delivery during the current plan period, it would still be **around 12% short** of what was being delivered previously, and **circa 18% below** what the existing Local Plan sought to provide.
- The Council envisages this need being met by a range of sites that would collectively provide **25,596 homes**, over half of which are reported as having already been completed or granted planning permission. The residual need is proposed to be met through the rolling forward of existing allocations and the allocation of further sites.
- The Council expects **at least 30%** of the homes delivered through major schemes to be affordable, and generally offered at social rent. It suggests that these will most often need to contain three bedrooms but reports a relatively balanced need for different unit sizes, unlike for shared ownership and market housing where larger homes are more often required.

4. Economic Implications

- 4.1 While not explicitly referenced in the draft Plan, the Council is believed to have been advised – through its Employment Needs and Land Supply Study (ENLSS) – that aligning with the standard method and providing 1,205 dwellings per annum would enable the creation of ‘*a significantly higher number of jobs*’ than are envisaged by baseline forecasts²⁹.
- 4.2 It is presumably for this reason that it is not proposing to set a requirement higher than what is intended to be only a ‘*minimum*’ need, as the NPPF explicitly permits where this ‘*reflects growth ambitions linked to economic development*’³⁰.
- 4.3 Such an approach does though appear misguided, in large part due to the pessimism of the baseline forecasts that have informed the Council’s decision.
- 4.4 The ELNSS introduces three such forecasts, from each of the leading providers in Oxford Economics, Cambridge Econometrics and Experian. These envisage the creation of up to 695, and as few as 51, jobs per annum between 2023 and 2043³¹. While only the lowest falls below the job growth that has actually been seen during the current plan period, according to the earlier Figure 2.6, even the most optimistic forecast – from Experian – would create little more than half the jobs that have been targeted annually by the existing Local Plan.

Figure 4.1: Benchmarking Forecast Employment Growth in Swindon



Source: Turley analysis

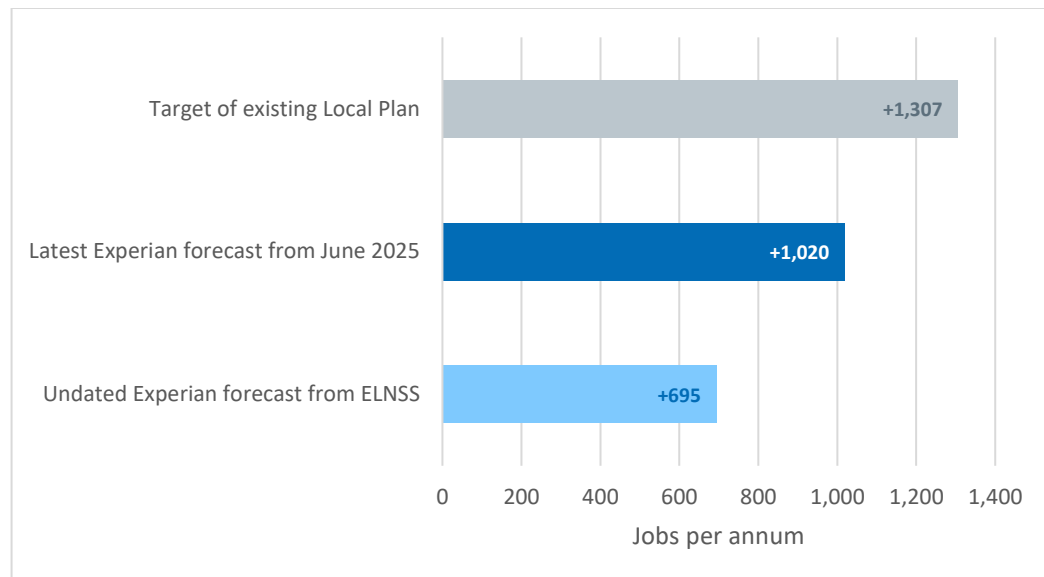
²⁹ Iceni Projects (March 2025) Swindon Employment Needs and Land Supply Study, paragraph 1.52

³⁰ MHCLG (December 2024) National Planning Policy Framework, paragraph 69

³¹ Iceni Projects (March 2025) Swindon Employment Needs and Land Supply Study, Table 10.3

- 4.5 Although it is surprisingly unclear precisely when the forecasts were developed, it is of note that Experian – the most optimistic when the ENLSS was produced – are now even more positive about the growth prospects of Swindon. Their latest forecast, of June 2025, envisages the creation of some 47% more jobs each year – circa 1,020 – remaining around a fifth short of the previous target but at least closing more than half of the gap.

Figure 4.2: Introducing the Most Recent Experian Forecast



Source: Experian; Swindon Borough Council

- 4.6 It is acknowledged that the ENLSS does not refer only to baseline forecasts, having itself also developed a range of ‘*alternative scenarios*’ that amongst other things:
- Allow for the closure of the Honda factory in 2022, ostensibly ‘*rebased*’ the Experian forecast that appears to have been given the greatest weight³²;
 - Further adjust this rebased forecast to allow for the creation of an estimated 7,000 jobs on the site of the former factory, based on a consented Panettoni scheme that has been assumed to create jobs in the manufacturing, transport and storage sectors³³;
 - Improve the rebased outlook for the so-called ‘*key sectors*’ of the green economy, technology and innovation, hospitality and tourism, professional services and education, based on discussions with stakeholders³⁴; and
 - Allow for what is termed ‘*super growth*’, reflecting what the study’s authors believe to be ‘*a realistic best-case scenario for economic growth in the Borough*’³⁵.

³² *Ibid*, p153

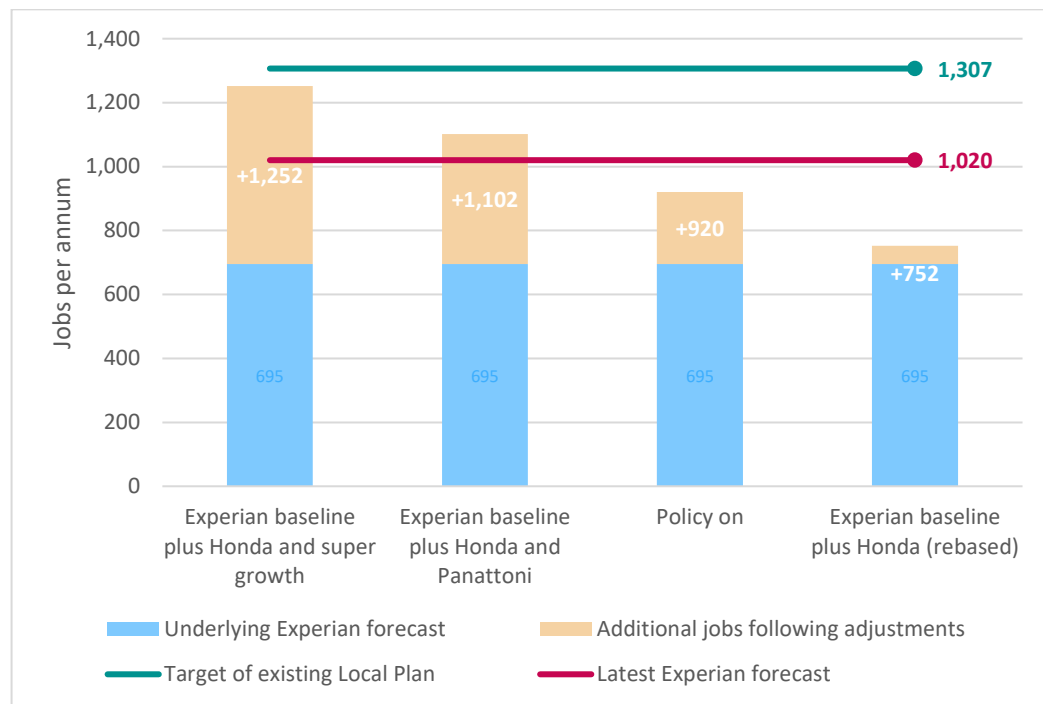
³³ *Ibid*, paragraph 10.21

³⁴ *Ibid*, p149

³⁵ *Ibid*, paragraph 10.26

- 4.7 While all of these alternative scenarios envisage more jobs than were otherwise forecast by Experian, even supposedly ‘*super growth*’ would effectively downgrade the ambition of the existing Local Plan in envisaging the creation of only 1,252 jobs per annum. This is potentially due to the pessimism of the Experian forecast on which all are believed to have been based, with the outcome more likely to have been positive if based on its more recent and optimistic outlook.

Figure 4.3: Benchmarking Job Growth in the Alternative Scenarios of the ENLSS



Source: Icen Projects; Turley analysis

- 4.8 It would be surprising for the Council to lower its ambitions where it suggests elsewhere in the draft Plan that it is aiming to ‘*build upon*’ the borough’s existing strengths, while diversifying to improve economic resilience³⁶. The Council suggests that it is:

“...actively working with investors and key stakeholders, specifically encouraging professional business services, advanced manufacturing, low carbon technologies, and life sciences. There is also interest in the creative industries, digital ICT and cyber security, and defence”³⁷

- 4.9 The Council has also committed, within its corporate plan for the period to 2027, to ‘*develop partnerships with...[the] business community*’ so as to ‘*build enthusiasm, interest and opportunities which support inward investment and job creation on*

³⁶ Swindon Borough Council (September 2025) Swindon Local Plan 2023-2043: Regulation 18 consultation draft, p73

³⁷ *Ibid*, p73

Swindon'³⁸. This supports an overarching ambition to '*build a better Swindon*', by amongst other things making it '*a place where business can thrive*'³⁹.

- 4.10 The Council has also recently partnered with neighbouring Wiltshire to produce a longer-term economic strategy for the two areas, looking ahead to 2036⁴⁰. This outlines how the wider area '*prides itself for its long-standing economic resilience and breadth of economic growth assets*' and describes how the strategy represents '*the next chapter*' of the two authorities working together on their '*common goals*', one of only three stated being to '*deliver a better and thriving economy*'⁴¹. It particularly aims to address what it describes as a '*levelling out*' of Swindon's historically strong economic performance, by setting '*the framework for longer-term sustainable economic growth*'⁴².
- 4.11 The Council's own evidence suggests that even so-called '*super growth*' – ostensibly '*realistic*' but still less ambitious than targeted by the existing Local Plan – would generate a greater need for housing than implied, as only a minimum, by the standard method⁴³. It estimates that simply meeting this minimum need would support the creation of only 1,137 jobs per annum, circa 9% below what could result from '*super growth*' and some 13% short of the existing target. It does not proceed to estimate how many homes could be needed to support such '*super growth*', having wholly ignored the existing target, but the clear implication is that this would require more than the 1,205 homes that the Council is proposing to plan for each year. It is advised to estimate exactly how many through the commissioning of new evidence, ahead of its next consultation on the new Local Plan, so as to avoid housing becoming a barrier to investment of the kind that the NPPF expects planning policies to proactively address⁴⁴.

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³⁸ Swindon Borough Council (2024) Swindon Plan 2024-2027, p40

³⁹ *Ibid*, p36

⁴⁰ Swindon Borough Council and Wiltshire Council (December 2024) Emerging Economic Strategy for Swindon and Wiltshire 2025-2036

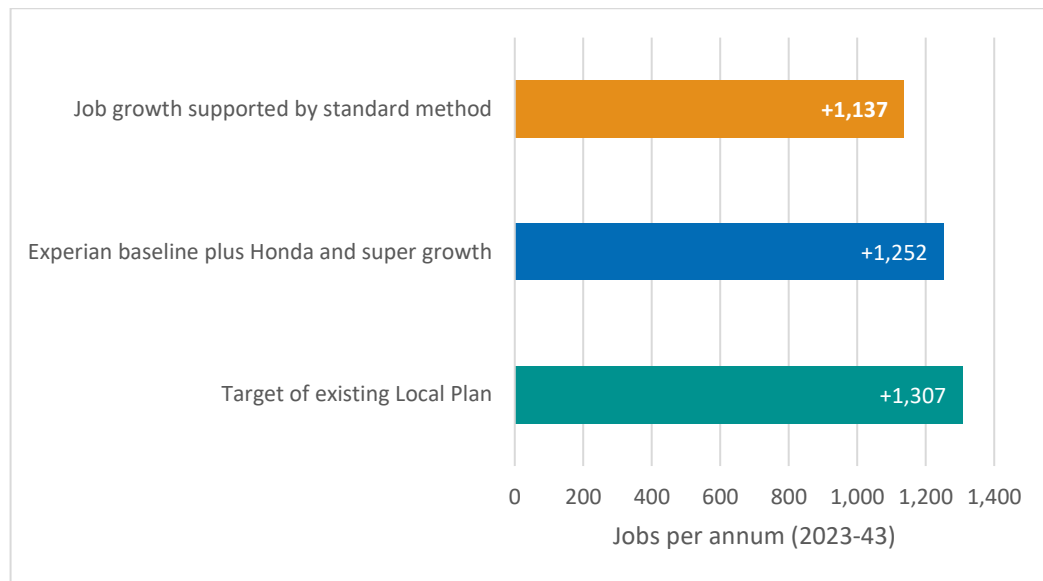
⁴¹ *Ibid*, p8

⁴² *Ibid*, p9

⁴³ Icen Projects (March 2025) Swindon Employment Needs and Land Supply Study, paragraph 10.28

⁴⁴ MHCLG (December 2024) National Planning Policy Framework, paragraph 86d

Figure 4.4: Prospect of Higher Job Growth than Supported by Standard Method



Source: Icen Projects; Turley analysis

Summary

- The Council's evidence suggests that housing provision in line with the standard method could support the creation of **'significantly' more jobs than are forecast in Swindon.**
- This does though fail to recognise the **pessimism of the three baseline forecasts** presented therein, even the most optimistic of which – since upgraded by Experian – envisages barely half the number of jobs targeted by the existing Local Plan.
- While a range of alternative scenarios are also presented, even these would effectively **downgrade the ambition of the existing Local Plan**, likely at least partly because they have been based on a relatively pessimistic baseline that has since been upgraded.
- It would be surprising for the Council to lower its economic ambitions having seemingly aimed to build upon existing strengths, **actively pursuing investment and aspiring to make Swindon a resilient place where businesses can thrive.**
- Achieving the level of job growth previously targeted would almost certainly generate **a greater need for housing than implied as only a minimum by the standard method**, according to the Council's own evidence. This would even be true of the most optimistic but *'realistic'* of the scenarios presented therein, with circa 10% more jobs created than would likely be supported by the resident labour force.

5. Implications for Affordable Housing

- 5.1 There is extensive evidence highlighting the severity of the national housing crisis in the UK, which leaves millions of people unable to secure adequate accommodation that meets their needs. It is evident that a significant increase in housing delivery, particularly affordable housing, is crucial to addressing the housing crisis.
- 5.2 The NPPF is clear that in order to meet the social dimension of sustainable development **it is imperative to ensure that a sufficient number and range of homes can be provided to meet the needs of present and future generations** (paragraph 8b). In this respect it is important also acknowledge the Government's objective of significantly boosting the supply of homes (paragraph 61).
- 5.3 In line with this objective, paragraph 61 highlights that that the overall aim should be to meet an area's identified housing need, including an appropriate mix of housing types for the local community. Paragraph 62 emphasises that planning policies should be informed by a Local Housing Needs Assessment (LHNA), whilst paragraph 63 is clear that housing required for different groups, including affordable housing, should be assessed and reflected in planning policies.

Emerging Development Plan and Evidence Base

- 5.4 The Regulation 18 consultation document recognises the need for affordable homes across Swindon throughout. In particular:
- Paragraph 1.3 (page 8) recognises that as Swindon's population grows, so too does the need for new homes, including affordable housing, to support a good quality of life for residents.
 - The Vision in paragraph 2.3 (page 17) commits to making Swindon *"a place of fairness, where people can aspire to and achieve an affordable place to live,"* underlining the centrality of affordability to the borough's long-term spatial strategy.
 - Strategic Objective SO3 'Homes for All' (page 20) seeks to make Swindon *"better and fairer by ensuring the right types and tenures of housing are delivered to meet the needs of current and future residents,"* including a specific emphasis on providing affordable housing.
 - Paragraph 6.1 (page 50) acknowledges that housing is essential for growth and that new homes must meet the needs of both current and future residents, as set out in paragraph 8b of the NPPF, reinforcing the link between planned growth and affordable provision.
 - Paragraph 6.2 (page 50) emphasises that providing affordable housing is a fundamental component of housing delivery and an essential part of creating a fairer and more inclusive Swindon.

- 5.5 Draft Policy HC2 'Affordable Housing' (page 52) is the primary policy in respect of the provision of Affordable Housing. Criteria 1 requires that all major development maximise affordable housing delivery and provide, as a minimum, 30% affordable homes. The Appendix 2 glossary of the draft Plan makes clear that 'major development' reflects the definition set out in Annex 2 of the NPPF (i.e. 10 or more dwellings or the site has an area of 0.5 hectares or more).
- 5.6 Criterion 1 goes on to state that of the 30% to be provided on site there is a local need for 78% to be social rent. Criterion 2 further emphasises that, wherever possible, affordable housing should be delivered on-site and that the size and tenure mix should be informed by up-to-date local housing needs evidence, including the Local Housing Needs Assessment and sub-area analysis, with a particular focus on providing social and affordable rented homes.
- 5.7 There is an inherent contradiction between the two policy criteria. Criterion 1 implies a fixed requirement for 78% of affordable homes to be provided as social rent, whereas Criterion 2 states that the tenure mix should be informed by up-to-date local housing needs evidence. It is therefore unclear whether the 78% social rent proportion is intended to operate as a mandatory requirement or as an indicative benchmark subject to local evidence. This lack of clarity risks inconsistency in decision-making and could undermine the flexibility needed to respond to changing evidence over the plan period.
- 5.8 The 2025 Local Plan Viability Assessment (2025 LPVA)⁴⁵ tested a base tenure mix of 40% Social Rent, 40% Affordable Rent, and 20% Shared Ownership (paragraph 12.54) to represent a typical affordable housing profile. The assessment identifies that increasing the proportion of Social Rent above this level would have a negative impact on viability. Paragraph 12.53 goes on to highlight that higher density flatted development in the central area is unlikely to be viable even without affordable housing.
- 5.9 Paragraph 12.56 of the 2025 LPVA highlights that switching delivery from Affordable Rent to Social Rent reduces the amount that can be paid for land by approximately £85,000 per hectare on greenfield sites and by around £350,000 per hectare on brownfield flatted developments, as set out in Table 12.15. Paragraphs 12.56 and 12.57 demonstrate that this impact is greater on brownfield sites where viability is more constrained.
- 5.10 Paragraph 12.58 advises that the Council *"should be cautious around requiring developers to deliver Social Rent rather than Affordable Rent as this will adversely impact viability and may result in a lower overall affordable housing target."* Paragraph 12.59 further highlights the importance of flexibility in the policy approach to ensure that affordable housing delivery remains viable across different site types and market conditions.
- 5.11 Paragraphs 12.73 and 12.74 consider viability more broadly. Paragraph 12.73 advises that reliance on brownfield sites within the five-year land supply and overall trajectory should be treated with caution, as delivery of such sites is likely to remain challenging. Paragraph 12.74 records that the modelling includes potential strategic sites and that, on the basis of the high level modelling, the delivery of some of these sites is likely to be

⁴⁵ Document reference 02.03

challenging when subject to the estimated strategic infrastructure and mitigation costs. It recommends further engagement with promoters and inclusion of sites in the new Local Plan **only** if they can be demonstrated to be viable.

- 5.12 Supporting paragraph 6.9 (page 62) of the draft Plan considers the findings of the Swindon Local Housing Needs Assessment published in June 2025 (2025 LHNA). It highlights a need for 7,171 net affordable homes over the 20-year plan period (2023–2043), equivalent to around 359⁴⁶ dwellings per annum. Of this total, 4,346 are required as social or affordable rented homes and 2,825 as intermediate ownership products. This equates to around 29.98% of Swindon’s overall housing need.
- 5.13 Appendix 3 of the draft Plan sets out the Monitoring Framework for the emerging policies. In relation to Policy HC2, it identifies a single key performance indicator: “Percentage of affordable housing permitted and delivered,” with an associated target of “30% affordable housing.” The absence of a defined numerical target, or benchmark linked to identified need means there is no meaningful basis on which to assess performance. Consequently, the effectiveness of the policy cannot be robustly monitored, and the Plan lacks any mechanism to trigger corrective action should delivery fall below expectations.
- 5.14 In this context, it is also important to highlight that Regulation 34(3) of the Town and Country Planning (Local Planning) (England) Regulations 2012, which places a Statutory Duty on local planning authorities to monitor the effectiveness of their planning policies, is clear that reporting of affordable housing additions to stock in annual monitoring reports should be on a net basis. To ensure effective monitoring and compliance with this requirement, the Council should establish a clear annual trajectory for affordable housing delivery aligned to the 2025 LHNA, report progress against both gross and net additions, and set defined triggers for review if delivery falls below expected levels.

Affordable Housing Delivery to Date over the Plan Period

- 5.15 In the first monitoring year (2023/24) of the emerging Local Plan period, the Council has added 166 gross affordable dwellings to its housing stock⁴⁷. When compared with the total net housing completions figure of 831 dwellings (as identified in Appendix 3 of the Regulation 18 consultation document), gross affordable housing delivery has represented 20% of additions.
- 5.16 Whilst the gross data from MHCLG accounts for new build affordable dwellings and acquisitions from the private sector, it does not account for any reductions in affordable housing stock due to demolitions or Right to Buy sales. Table 5.1 below illustrates the effect of Right to Buy sales on gross additions in Swindon. This distinction between gross and net figures is critical when comparing delivery against net need.

⁴⁶ $7,171 / 20 = 358.55$

⁴⁷ MHCLG (June 2024) Live Table 1008C: Total additional affordable dwellings provided by local authority area – completions

Table 5.1: Net Additions to Affordable Housing Stock, 2023/24

Monitoring Period	Gross Additions	Right to Buy Sales	Net Additions	% Change
2023/24	166	55	111	-33%

Source: MHCLG; Turley analysis

- 5.17 The data highlights that of the 166 gross affordable dwellings added in 2023/24, 55 were lost through Right to Buy, resulting in only 111 net additions. This represents a 33% reduction in delivery once losses are accounted for, meaning that one in every three new affordable homes was effectively removed from the stock within the same year. The cumulative effect of such losses erodes progress toward meeting affordable housing need and must be accounted for in any credible trajectory or monitoring framework. However, the Local Plan contains no mechanism to adjust delivery expectations based on losses.
- 5.18 Table 5.2 below compares the level of net affordable housing delivery achieved in 2023/24 against the annualised need identified in the 2025 LHNA. This provides an initial indication of the scale of the shortfall that has already begun to accumulate within the first monitoring year of the emerging Local Plan period.

Table 5.2: Net Additions to Affordable Housing Stock Compared to Affordable Needs identified in the 2025 LHNA, 2023/24

Monitoring Period	Net Additions	Net Need	Shortfall	Additions as a %age of Needs
2023/24	111	359	-248	31%

Source: MHCLG; 2025 LHNA; Turley analysis

- 5.19 Table 5.2 demonstrates a shortfall of 248 affordable homes in a single year, with only 31% of needs being met. The data indicates that nearly seven out of ten households in need of an affordable home did not have their needs met in 2023/24, signalling a significant and immediate gap between identified need and delivery performance.
- 5.20 The scale of the shortfall, combined with the substantial number of households on the Council's Housing Register, underscores an urgent and pressing need for affordable housing. The 4,530 households on the Council's Housing Register⁴⁸ are in need of an affordable home *now*. As such, the aim should be to meet the shortfall in affordable housing provision as soon as possible i.e. over the next five years, in line with the approach set out in the NPPG⁴⁹ for overall housing shortfalls.
- 5.21 To clear the 249 dwelling shortfall accumulated in 2023/24, the Council would need to deliver 409⁵⁰ net affordable dwellings per annum over the next five years (2024/25 to 2029/30), representing a 14% increase from the annual need of 359 net affordable

⁴⁸ MHCLG (June 2024) Table 600: number of households on local authority housing registers (waiting lists), by district, England, from 1987

⁴⁹ Paragraph: 031 Reference ID: 68-031-20190722

⁵⁰ 248 / 5 years = 49.6 + 359 = 408.6

dwelling identified in the 2025 LHNA. Without a step change in affordable housing delivery this is unlikely to be realised.

Likely Housing Supply over the Plan Period

5.22 The Housing Trajectory at Appendix 3 Regulation 18 consultation document suggests that a total of **25,796 dwellings** are projected to be delivered between 2023/24 and 2043/44. The sources of supply are as follows:

- Net completions (2023/24) – 831 homes
- Windfall permissions (2024/25 to 2038/39) – 2,818 homes
- Strategic Allocations with permission (2025/26 to 2039/40) – 9,949 homes
- Strategic Allocations without permission (2025/26 to 2039/40) – 3,498 homes
- New Site Allocations (2027/28 to 2043/44) – 8,700 homes

5.23 The above breakdown includes 200 dwellings from new site allocations projected for delivery in ‘year 21’, which falls beyond the 2023/24 to 2042/43 plan period. Accordingly, the total projected supply within the plan period stands at **25,596** dwellings. This distinction should be made explicit in Appendix 3 to avoid confusion regarding the timing of delivery. In addition, the ‘new site allocations’ figure of 8,700 homes in Appendix 3 differs from the total of 8,344 homes stated from this source in paragraph 6.6. This inconsistency should be corrected in the final version of the plan.

5.24 It is also noted that a site-by-site housing trajectory for the sources of supply listed in Appendix 3 was not originally published as part of the Local Plan evidence base. Turley sought this information from the Council during the consultation period. On 3 October 2025, the Council subsequently published a site-by-site trajectory⁵¹ for the new allocations, indicating a supply of 8,499 dwellings up to the end of the plan period in 2042/43 and a further 200 dwellings in ‘year 21’, broadly⁵² consistent with the total set out in Appendix 3.

5.25 In respect of the remaining components of supply, the Council confirmed that the Five-Year Housing Land Supply (5YHLS) Annexes (2025–2030) set out site-level information for windfall permissions and rolled-over strategic allocations (both with and without planning permission) from the adopted Local Plan (2026). The 5YHLS indicates that in the 2024/25 monitoring period 505 net dwellings were completed⁵³, which falls below the 778 dwellings expected for this period in the Appendix 3 trajectory.

5.26 The 5YHLS anticipates a total supply of **6,456 dwellings** over the five-year period from 1 April 2025 to 31 March 2030 from the following sources of supply:

⁵¹ Document reference 03.08

⁵² Difference of 1 dwelling

⁵³ 202 dwellings from detailed planning permissions (Annex A) and 306 dwellings from strategic site allocations (Annex D)

- **Annex A:** Detailed planning permissions (non-strategic sites) – 1,418 dwellings
 - **Annex B:** Prior Approvals (non-strategic sites) – 469 dwellings
 - **Annex C:** Outlines (non-strategic sites) – 60 dwellings
 - **Annex D:** Strategic site allocations – 4,272 dwellings
 - **Windfalls:** Small sites (minor development) - 237 dwellings
- 5.27 While the 5YHLS identifies a continued yield from strategic and non-strategic sites beyond the five-year period (i.e. 2030/31 onwards), it does not specify when these sites are expected to come forward. For the purposes of this report, it is assumed that delivery will be distributed across the 13-year period between 2030/31 and the end of the plan period in 2042/43. However, this assumption introduces uncertainty given the absence of phasing information in the Council’s evidence.
- 5.28 The Council anticipates that it has a total supply of **10,724 dwellings** from 2030/31 onwards from the following sources of supply:
- **Annex C:** Outlines (non-strategic sites) – 450 dwellings
 - **Annex D:** Strategic site allocations – 10,274 dwellings
- 5.29 Table 5.3 below summarises the Council’s stated components of supply as drawn from the 5YHLS and the subsequently published trajectory for new allocations.

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Table 5.3: Sources of Housing Supply, 2023/24 to 2042/43

Monitoring Period	Actual Completions (Net)	Expected Supply 2025/26 - 2029/30	Expected Supply 2030/31 onwards	New Allocations	Totals
2023/24	831				831
2024/25	505				505
2025/26		1,291			1,291
2026/27		1,291			1,291
2027/28		1,291		130	1,421
2028/29		1,291		435	1,726
2029/30		1,291		443	1,734
2030/31			825	558	1,383
2031/32			825	865	1,690
2032/33			825	851	1,676
2033/34			825	692	1,517
2034/35			825	776	1,601
2035/36			825	673	1,498
2036/37			825	515	1,340
2037/38			825	600	1,425
2038/39			825	605	1,430
2039/40			825	484	1,309
2040/41			825	431	1,256
2041/42			825	241	1,066
2042/43			825	200	1,025
Totals	1,336	6,456*	10,724*	8,499	27,015

Source: Swindon Borough Council; Turley analysis

*figures do not sum due to rounding

- 5.30 It is notable that the site-by-site information provided by the Council does not correspond to the figures set out in the Appendix 3 trajectory. Specifically, Appendix 3 identifies a total supply of 25,796 dwellings (25,596 within the plan period), whereas the combined site-level data presented in the 5YHLS and October 2025 trajectory indicates a total of 27,015 dwellings – a difference of approximately 1,200 homes.
- 5.31 The evidence published to date does not explain the reason for this variance. It may reflect differences in the treatment of post-2030/31 supply or the inclusion of sites that fall partly beyond the plan period, but this is not confirmed. The Council should therefore clarify the basis of its calculations and reconcile these inconsistencies to ensure accuracy and transparency in the presentation of its housing trajectory.

Projected Affordable Housing Supply over the Plan Period

- 5.32 To assess the likely supply of affordable housing from the sites included in the 5YHLS (both within the five-year period and post-2030/31), a review has been undertaken of the planning application documentation for each site that qualifies for affordable housing contributions (i.e. those constituting major development).
- 5.33 For the sites that do not yet have planning permission or a live application, it has been assumed that policy-compliant levels of affordable housing will be delivered in accordance with Local Policy (i.e., 30% on site provision). No affordable housing delivery from the small-site windfall allowance has been assumed, as these sites fall below the threshold for affordable housing contributions. As larger sites often deliver housing across multiple phases over an extended period, a 'pro-rata' estimate of affordable housing contributions has been applied. The findings of this review are summarised in **Appendix 1**.
- 5.34 The analysis indicates the following likely gross supply of affordable homes:
- Over the five-year period between 2025/26 and 2029/30 there is a pipeline supply of approximately **1,018 affordable homes, equivalent to an average of 204 affordable dwellings per annum.**
 - In the 13-year period between 2030/31 and the end of the plan period in 2042/43, there is a pipeline supply of approximately **2,171 affordable homes, equivalent to an average of 167 affordable dwellings per annum.**
- 5.35 It is important to reiterate that the latter figure, relating to delivery in the period post-2030/31, is based on the assumption that all of the identified sites are delivered in full within the plan period. This assumption is inherently uncertain, given the potential for slippage in delivery timetables. This is particularly true for large strategic sites that are yet to secure planning permission. No information has been provided by the Council to confirm the anticipated timing, phasing, or trajectory of delivery from these post-2030/31 sites, meaning that the analysis necessarily relies on assumptions rather than evidenced likely delivery.
- 5.36 In respect of the new site allocations, 31 of the 33 allocations comprise major development as defined by the NPPF and are therefore expected to deliver 30% on-site affordable housing in accordance with draft Policy HC2. Collectively, these 31 sites are anticipated to deliver approximately 8,485 dwellings between 2027/28 and 2042/43. **This equates to a potential yield of around 2,546⁵⁴ affordable homes if policy requirements are fully achieved.**
- 5.37 Site-by-site trajectory data for the new allocations, together with the corresponding phased pro-rata estimates of affordable housing delivery, are provided at **Appendix 2**.

⁵⁴ 30% of 8,499 = 2,545.5

- 5.38 Table 5.4 below summarises the projected likely affordable housing supply over the plan period, noting that there is currently no publicly available affordable housing completions figure for the 2024/25 monitoring period.

Table 5.4: Projected Affordable Housing Supply, 2023/24 to 2042/43

Monitoring Period	Actual Completions (Net)	Expected Supply 2025/26 - 2029/30	Expected Supply 2030/31 onwards	New Allocations	Totals
2023/24	111				111
2024/25	Unknown				0
2025/26		204			204
2026/27		204			204
2027/28		204		39	243
2028/29		204		131	335
2029/30		204		133	337
2030/31			167	167	334
2031/32			167	255	422
2032/33			167	255	422
2033/34			167	208	375
2034/35			167	233	400
2035/36			167	202	369
2036/37			167	155	322
2037/38			167	180	347
2038/39			167	182	349
2039/40			167	145	312
2040/41			167	129	296
2041/42			167	72	239
2042/43			167	60	227
Totals	111	1,020*	2,171	2,546*	5,848

Source: Swindon Borough Council; Turley analysis

*figures do not sum due to rounding

- 5.39 Table 5.4 highlights that the total potential supply of 5,848 affordable dwellings over the plan period which equates to an average of approximately 292⁵⁵ dwellings per annum. This level of delivery falls significantly short of the identified need for affordable housing set out in the Council's evidence base, indicating that the emerging Local Plan will not meet the full affordable housing requirement without additional site allocations and/or stronger delivery mechanisms.
- 5.40 Table 5.5 calculates the potential shortfall in affordable housing delivery over the plan period, based on the identified need for 359 net affordable dwellings per annum as set

⁵⁵ 5,848 / 20 years = 292.4

out in the 2025 LHNA. The calculation applies the projection assumptions summarised in Table 5.4 to determine the overall deficit in provision across the plan period. Need and supply from the 2024/25 period has been discounted from the analysis to reflect the absence of confirmed completions data for that year, ensuring that the comparison between need and projected supply is based on evidenced and forecast delivery only.

Table 5.5: Actual and Projected Additions to Affordable Housing Stock Compared to Affordable Needs Identified in the 2025 LHNA, 2023/24 to 2042/43

Monitoring Period	Additions to AH Stock		Net Need (Pa.)	Annual Shortfall	Cumulative shortfall
	Actual (Net)	Projected (Gross)			
2023/24	111		359	-248	-248
2024/25					
2025/26		204	359	-155	-403
2026/27		204	359	-155	-558
2027/28		243	359	-116	-674
2028/29		335	359	-25	-699
2029/30		337	359	-22	-721
2030/31		334	359	-25	-745
2031/32		422	359	63	-682
2032/33		422	359	63	-619
2033/34		375	359	16	-603
2034/35		400	359	41	-562
2035/36		369	359	10	-552
2036/37		322	359	-38	-590
2037/38		347	359	-12	-602
2038/39		349	359	-11	-612
2039/40		312	359	-47	-659
2040/41		296	359	-63	-722
2041/42		239	359	-120	-842
2042/43		227	359	-132	-974
Totals	5,848		6,462	-974	

Source: Swindon Borough Council; 2025 LHNA; Turley analysis

*figures do not sum due to rounding

- 5.41 Table 5.5 demonstrates that, even in a best-case scenario where all sites deliver in line with policy requirements, there would remain a cumulative shortfall of approximately 974 affordable dwellings over the plan period when compared to the identified need in the 2025 LHNA. This analysis represents an optimistic position, as it assumes full delivery of the housing trajectory in the plan period and achievement of policy-compliant affordable housing percentages across all major sites.

- 5.42 The analysis does not account for the impact of Right to Buy and other forms of stock loss, which have historically eroded the net increase in affordable housing supply within the Borough as evidenced earlier in this report. Nor does it allow for the potential that some new allocations or existing permissions may deliver below-policy levels of affordable housing due to viability constraints. In this context, it is relevant to highlight that the majority of the council's proposed new housing allocations are on Brownfield Land and/or in the central plan area.
- 5.43 As already noted, the 2025 LPVA makes clear that delivery on such sites is likely to remain challenging. Paragraph 12.73 advises caution about reliance on brownfield sites in the five year land supply and overall trajectory. Similarly, as evidenced in **Appendix 1**, a number of sites within the existing supply (most of which are located in the central plan area) have secured planning permission with reduced or, in some cases, no on site affordable housing contribution. The true level of affordable housing delivery is therefore likely to fall materially below the estimates set out in Table 5.5.
- 5.44 The scale of the projected shortfall indicates that the current housing trajectory and proposed site allocations will not provide sufficient capacity to meet identified affordable housing needs. To address this deficit, the Council will need to identify additional deliverable and developable sites capable of supporting policy-compliant levels of affordable housing, including through the allocation of further land in sustainable locations. Without such measures, the plan cannot be considered effective in meeting the full need for affordable housing over the plan period.
- 5.45 More broadly, the magnitude of affordable housing need reinforces the argument set out in Chapter 4 that a higher overall housing requirement may be necessary to ensure that both market and affordable needs can realistically be met.

Other Material Considerations

- 5.46 Key indicators such as the number of households on the Council's Housing Register, the use of Temporary Accommodation (TA), and households presenting as homelessness demonstrate an urgent need for more affordable housing *now* across the Borough:
- **High Need for Social Housing:** As of 31 March 2024, there were 4,530 households (not individuals) on the Council's Housing Register⁵⁶.
 - **Housing Conditions:** Of those on the Housing Register on 31 March 2024, 3,479⁵⁷ households (77%) qualified under a Reasonable Preference⁵⁸ category, meaning they are in urgent need of housing. This included:
 - 42% (1,459 households) needing to move on medical welfare grounds

⁵⁶ MHCLG (June 2024) Table 600: number of households on local authority housing registers (waiting lists), by district, England, from 1987

⁵⁷ MHCLG (June 2025) Local Authority Housing Statistics data returns for 2023 to 2024

⁵⁸ Local authorities are legally required under the Housing Act 1996 (as amended by the Homelessness Act 2002) to give reasonable preference to those in the greatest housing need, ensuring fair and transparent allocation of social housing.

- 22% (770 households) living in insanitary or overcrowded conditions
- 9% (305 households) classed as homeless within the meaning of Part VII of the Act
- **Rising Use of Temporary Accommodation:** As of 31 March 2024, 386 households were placed in TA by the Council⁵⁹. This represents a 21% increase from the 303 households on 31 March 2023⁶⁰ and a 194% increase from the 125 households on 31 March 2022⁶¹.
 - Of the 386 households placed in TA on 31 March 2024, 63% had at least one dependent child. There were a total of **422 children** in TA on this date.
- **Reliance on Costly Private-Sector Solutions:** Just 17% of households in TA on 31 March 2024 were placed in local authority or Housing association stock. The remaining 83% were placed in unsuitable private sector accommodation, with 40% in leased private sector accommodation, 15% in bed and breakfast hotels (including shared annexes), 13% in nightly paid privately managed accommodation, and 11% in hostels⁶². These are expensive and insecure placements that keep families in limbo and drain already stretched budgets
- **Escalating Financial Burden:** The Council's expenditure on temporary accommodation has risen sharply in recent years. In 2021/22, spending stood at £2,457,000⁶³, increasing by 40% to £3,445,000 in 2022/23⁶⁴. By 2023/24, costs had risen by a further 55% to £5,334,000⁶⁵. This steep upward trajectory places a growing and unsustainable burden on local finances.
 - Of the £5,334,000 spent on TA in 2023/24, 43% was spent on leasing private sector accommodation and a further 38% was spent on Bed and breakfast hotels (including shared annexes).

Without urgent intervention to deliver sustainable alternatives, the Council will remain locked into an unaffordable cycle of short-term, unsuitable accommodation that fails both households in need and the taxpayer.

⁵⁹ MHCLG (October 2024) Statutory homelessness in England: financial year 2023-24

⁶⁰ MHCLG (November 2023) Statutory homelessness in England: financial year 2022-23

⁶¹ MHCLG (July 2022) Statutory homelessness in England: financial year 2021-22

⁶² MHCLG (October 2024) Statutory homelessness in England: financial year 2023-24

⁶³ MHCLG (May 2025) Local authority revenue expenditure and financing England: 2021 to 2022 individual local authority data - outturn

⁶⁴ MHCLG (July 2025) Local authority revenue expenditure and financing England: 2023 to 2024 individual local authority data - outturn

⁶⁵ MHCLG (December 2024) Local authority revenue expenditure and financing England: 2023 to 2024 individual local authority data - outturn

- **High levels of Homelessness Cases:** Between 1 April 2023 and 31 March 2024, the Council accepted 1,556 households⁶⁶ under a homelessness prevention⁶⁷ or a relief duty⁶⁸:
 - Among those receiving a Prevention Duty (640 households), the leading cause was the end of private rented tenancy (41%), followed by family and friends no longer willing or able to accommodate (15%).
 - For those under Relief Duty (916 households), the primary drivers were family or friends no longer able to accommodate (32%) and fleeing domestic abuse (10%), highlighting crisis driven causes.

5.47 These figures present a clear picture of escalating housing challenges in Swindon. Without increased affordable housing provision, reliance on costly short-term emergency measures will continue to grow, placing further strain on public funds and vulnerable households.

Summary

- National policy and guidance require a sufficient number and range of homes to meet needs, with the LHNA as the key evidence base and a clear emphasis on significantly boosting supply.
- Draft Policy HC2 seeks at least 30% affordable homes on major development, but there is ambiguity between a fixed 78% social rent split and an evidence led tenure mix, creating interpretation risk.
- The 2025 LPVA shows higher social rent proportions weaken viability, with the impact most acute on brownfield and higher density flatted schemes, indicating a need for flexibility in tenure mix.
- Monitoring in the draft Plan focuses on a single 30% proportion rather than outcomes against identified need, and does not secure net reporting or clear triggers for review.
- In 2023 to 2024 there were 166 gross affordable completions but 55 Right to Buy losses, giving 111 net additions.
- Net additions in 2023 to 2024 met 31% of annual need, meaning nearly seven in ten households in need were not assisted. Clearing the emerging shortfall would require around 409 net affordable dwellings per year over the next five years, above the annual need identified in the LHNA.

⁶⁶ MHCLG (October 2024) Statutory homelessness in England: financial year 2023-24

⁶⁷ The Prevention Duty places a duty on housing authorities to work with people who are threatened with homelessness within 56 days to help prevent them from becoming homeless.

⁶⁸ The Relief Duty requires housing authorities to help people who are homeless to secure accommodation. The relief duty applies when a Local authority is satisfied that an applicant is homeless and eligible for assistance

- There are inconsistencies between the headline trajectory in Appendix 3 and site by site sources, and timing beyond 2030/2031 lacks clear phasing, introducing delivery risk.
- Based on permissions, pipeline review and policy compliant assumptions, the likely affordable supply over the plan period is circa 5,848 dwellings, averaging about 292 per year.
- Compared with an identified need of 359 per year, the best case scenario yields a cumulative shortfall of around 974 affordable dwellings across the plan period. The projection is optimistic as it assumes full policy compliance and does not deduct future Right to Buy or other losses, and many allocations are brownfield or central area sites where viability is challenging.
- Recent permissions on central sites often secure reduced or no on site affordable housing, implying actual delivery will fall below the modelled totals.
- The scale of the gap indicates that the current strategy will not meet affordable housing needs without additional deliverable and developable sites and stronger delivery mechanisms.
- Wider indicators reinforce urgency, including 4,530 households on the Housing Register, rising use and cost of temporary accommodation, and high levels of homelessness duties accepted.

6. Summary and Conclusions

- 6.1 This report has reviewed the emerging approach towards housing provision in Swindon, as set out in the draft Plan that is currently subject to consultation, to ascertain whether this is likely to meet both the overall need for housing and the specific need for affordable housing.
- 6.2 It has acknowledged that the new Local Plan will replace the existing one that was adopted in March 2015 and aimed to boost delivery by providing an average of 1,466 dwellings per annum between 2011 and 2026. It has ultimately not managed to do so, with delivery having not even once reached this level but instead slowed by a third compared to the five years prior to 2011.
- 6.3 This report has outlined the consequences of this failure to deliver planned housing growth, with this likely to at least partly explain why:
- **Population growth in Swindon has slowed**, again by around a third, with the rate of growth in the core working age population also having nearly halved since 2011;
 - **The borough has created fewer than 1,800 of the 19,600 jobs targeted** by the existing Local Plan, making Swindon the worst performing economy of its size in the South West;
 - **House prices have grown at an average rate of 4.5% per annum since 2011**, having barely grown over the prior five years;
 - **Housing affordability has worsened** to a greater extent than seen regionally or nationally, at both the midpoint and entry level of the market; and
 - **Fewer affordable homes have been provided**, during a period in which more have also been lost through Right to Buy.
- 6.4 The Council rightly refers to the outcome of the standard method in stating that there is now a need for **at least 1,205 dwellings per annum** in Swindon. Setting this as the housing requirement, as the Council proposes, would implicitly aim to boost recent delivery by almost a third but would still aim below what was delivered prior to the current plan period (1,370dpa) or what was actually targeted by the existing Local Plan (1,466dpa).
- 6.5 These higher benchmarks could well be more reflective of the future need in Swindon, where the standard method is intended to provide only a minimum figure and the NPPF makes clear that authorities can set higher housing requirements to align with economic growth ambitions. The Council's own evidence suggests that provision in line with the standard method would not support what its advisors consider the '*realistic best-case scenario for economic growth*', termed '*super growth*', and nor by implication would it belatedly enable the even higher level of job growth that was targeted by the existing Local Plan. The Council appears to have been satisfied that aligning with the standard method would support more jobs than baseline forecasts suggest will be created in Swindon, but those forecasts do appear pessimistic with at least one having since been

markedly upgraded. The Council should aim to reflect this more positive context and reconsider whether job growth is likely to generate a greater need for housing than implied, as only a minimum, by the standard method.

- 6.6 The Council should also consider the extent to which its identified supply of housing sites – reportedly capable of providing circa 25,596 homes – will meet the evidenced need for affordable housing. As demonstrated in this report, the emerging trajectory would support the delivery of around 5,848 affordable homes over the plan period, equivalent to an average of only 292 dwellings per annum. This would result in a cumulative shortfall of around 974 homes even under best-case assumptions of full policy compliance and delivery.
- 6.7 The scale of this gap, coupled with evidence of worsening affordability, increasing use of temporary accommodation, and rising homelessness pressures, indicates that the draft Plan will not provide an effective or deliverable strategy for meeting identified housing needs without additional site allocations, stronger delivery mechanisms, or flexibility in tenure expectations to ensure viability and maximise affordable provision.

Turley

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

Appendix 1: Five Year Housing Land Supply Annex's (Turley analysis)

Annex A – Detailed planning permissions (non-strategic sites)

Turley Ref.	Site Address	Development proposal	Parish	Outline Ref	RM / FULL	Units (Net)	Dwellings completed 2024/25	Net to be taken into trajectory	Expected Net Supply		AH Contribution Type	On Site AH %age	Projected Gross AH Supply		Source
									2025/26 - 2029/30	2030/31 onwards			2025/26 - 2029/30	2030/31 onwards	
T001	Former Oakfield Campus, Marlowe Avenue, Swindon	Erection of 239no. dwellings and community hub building (Class D1/B1(a) uses)	CENTRAL SWINDON SOUTH		S/19/0192	239	161	35	35	0	On Site	30%	11	0	S.106 dated 21/02/2020
T002	Newspaper House 99-100 Victoria Road, Old Town, Swindon	Demolition of rear ground floor office space and erection of five storey extension and third floor extension to existing building to provide an additional 24no. Apartments.	CENTRAL SWINDON SOUTH		S/19/0442	24	0	24	24	0	None (Viability)	0%	0	0	Delegated Report dated 24/10/2019
T003	Old School Maxwell Street Swindon	Conversion of Maxwell Old School into 18no. apartments, including a three storey extension and demolition of the prefabricated metal building and associated works.	CENTRAL SWINDON SOUTH		S/19/0415	18	0	18	18	0	Off Site (Contribution)	0%	0	0	S.106 dated 25/01/2022
T004	16-17 Fleet Street & 18-23 Bridge Street Swindon	Demolition of 20 Bridge Street and 17 Fleet Street, erection of 4no. commercial units (Class A1 and A3) and 14no. residential apartments and associated works. (Variation of condition of condition 1 from Planning Permission S/16/1679	CENTRAL SWINDON SOUTH		S/18/0401	14	0	14	14	0	None (Below threshold)	0%	0	0	Delegated Report dated 12/06/2018
T005	Haydon Farm, Haydon End Lane, Haydon Wick, Swindon	Conversion of existing outbuildings to form 4 no. dwellings and the erection of 10 no. dwellings, garages and associated works. Variation of condition 2 (approved plan), condition 5 (means of access) and condition 6 (vehicular parking) attached to planning permission S/17/0703.	HAYDON WICK		S/17/0703/ S/20/0192	14	0	4	4	0	None (Below threshold)	0%	0	0	Committee Report for S/17/0703 (original application) dated 12/04/2028
T006	The Quadrant, Stonehill Green, Swindon	Erection of 12no. dwellings and associated works.	WEST SWINDON		S/19/1100	12	3	3	3	0	None (Below threshold)	0%	0	0	AH not mentioned/ secured in application documentation
T007	Land At Ventnor Close Haydon Wick Swindon	Erection of 8no. dwellings and associated works (Site 1) and construction of parking area (Site 2).	HAYDON WICK		S/20/0546	8	0	8	8	0	None (Below threshold)	0%	0	0	n/a
T008	Former Telephone Exchange, Fire Fly Avenue, Swindon	Change of use from telephone exchange (sui generis) to 8no. apartments (use class C3) and associated works. - Variation of condition 2 from permission S/22/0116 to allow re-design of internal floor layout.	CENTRAL SWINDON NORTH		S/23/1381	8	0	8	8	0	None (Below threshold)	0%	0	0	n/a
T009	127 Commercial Road Swindon SN1 5PZ	Change of use from bank (class E) to 7 no. residential units (Class C3), retention of part of ground floor as commercial (E Class) use, along with an increase in roof height, erection of 9. no dormer windows and 1 rooflight to create additional storey, and alterations to windows and doors.	CENTRAL SWINDON SOUTH		S/22/1488	7	0	7	7	0	None (Below threshold)	0%	0	0	n/a
T010	Former 22 - 23 Victoria Road, Old Town Swindon	Erection of a 4 storey building to provide 147sqm of retail floor space on the ground floor, 6 no. apartments on the floors above and associated works (without compliance with conditions 1,3,4,6,7,and 8 of planning permission S/15/0042).	CENTRAL SWINDON SOUTH		S/19/1230 (previously S/15/06/2026)	6	0	6	6	0	None (Below threshold)	0%	0	0	n/a
T011	Prebendal Farm, Icknield Way, Bishopstone	Kept live by S/LDE/23/0127. Demolition and conversion of existing barns and erection of 2no. new buildings to create 5no. Dwellings, with associated garaged, landscaping, ancillary development and repairs to Grade II Listed wall without compliance with conditions 3, 15, 19, 20, 21, 22 and 23 from previous permission S/18/1709.	BISHOPSTONE		S/21/0940	5	0	5	5	0	None (Below threshold)	0%	0	0	n/a
T012	Lindseys Yard Turnpike Road Blunsdon Swindon SN26 7AE	Erection of 5 No. Self-build dwellings (Class C3) and associated works	BLUNSDON		S/22/1724	5	0	5	5	0	None (Below threshold)	0%	0	0	n/a
T013	The Forum Marlborough Road Swindon SN3 1QN	Change of Use from office (class E(g) and E(c) to 3no. apartments and 1 dwellinghouse (class C3), external alterations and associated works.	CENTRAL SWINDON SOUTH		S/22/0320	4	0	4	4	0	None (Below threshold)	0%	0	0	n/a
T014	County View Guest House 31 - 33 County Road Swindon SN1 2EG	Change of use from a large HMO (Sui Generis use) to form 2 no. dwellings (C3 use) and erection of no. 2 flats (C3 use), and associated works.	CENTRAL SWINDON SOUTH		S/23/0208	3	0	4	4	0	None (Below threshold)	0%	0	0	n/a
T015	Land At Ashley Close Walcot Swindon	Erection of 3no. dwellings and associated works.	CENTRAL SWINDON SOUTH		S/20/0435	3	0	3	3	0	None (Below threshold)	0%	0	0	n/a
T016	Manor Farm Workshops, South View Lane , South Marston, Swindon	Change of use from light industrial workshops (Use Class B1(c)) to 3no. residential dwellings (Use Class C3).	SOUTH MARSTON		S/20/0851	3	0	3	3	0	None (Below threshold)	0%	0	0	n/a
T017	The Cricketers Arms 14 Emlyn Square Railway Village Swindon	Change of use of former public house to retail unit, community centre, 3no. self-contained residences, one room of guest accommodation and associated works.	CENTRAL SWINDON SOUTH		S/21/1779	3	0	3	3	0	None (Below threshold)	0%	0	0	n/a
T018	50 Dixon Street, Swindon	Conversion of 1 no. dwelling into 3 no. dwellings	CENTRAL SWINDON SOUTH		S/19/0240	2	0	3	3	0	None (Below threshold)	0%	0	0	n/a
T019	15 Commercial Road Swindon	Change of use of first floor from Class E to Class C3 (2no. residential Units), and installation of external metal access staircase.	CENTRAL SWINDON SOUTH		S/21/1230	2	0	2	2	0	None (Below threshold)	0%	0	0	n/a
T020	New House Cottage, Blunsdon Hill, Blunsdon, Swindon	Demolition of existing building and replacement with 2no. dwellings	BLUNSDON		S/13/1806	1	0	1	1	0	None (Below threshold)	0%	0	0	n/a
T021	Land at and adjacent to Somerset, Hampton Lane, Hampton, Swindon	Demolition of majority of redundant barn and existing dwelling, and erection of 2no. Dwellings	HIGHWORTH		S/19/0424	1	0	1	1	0	None (Below threshold)	0%	0	0	n/a
T022	8 Cambria Bridge Road Swindon SN1 5LH	Conversionof 3 storey dwelling to 2no. flats.	CENTRAL SWINDON SOUTH		S/22/0620	1	0	1	1	0	None (Below threshold)	0%	0	0	n/a
T023	Former That Hovel , Oxon Place, Bishopstone , Swindon	Erection of 1no. dwelling.	BISHOPSTONE		S/20/0415	1	0	1	1	0	None (Below threshold)	0%	0	0	n/a
T024	6 Teeswater Close, Ramleaze, Swindon	Erection of a dwelling.	WEST SWINDON		S/21/0998	1	0	1	1	0	None (Below threshold)	0%	0	0	n/a

T025	7 Market Street Swindon	Change of use from Amusement arcade (Sui Generis) to shop (Class E) and dwelling with box dormer window to rear.	CENTRAL SWINDON SOUTH		S/21/1226	1	0	1	1	0	None (Below threshold)	0%	0	0	n/a
T026	Middle Farm Inglesham Lane Inglesham Swindon	Change of use of agricultural storage building to 1no. dwelling.	INGLESHAM		S/22/0084	1	0	1	1	0	None (Below threshold)	0%	0	0	n/a
T027	183 Swindon Road Stratton St Margaret Swindon SN3 4PW	Erection of 1no. detached dwelling and associated parking.	STRATTON ST. MARGARET		S/22/0717	1	0	1	1	0	None (Below threshold)	0%	0	0	n/a
T028	Land Adjacent To Eden Field Kingsdown Lane Blunsdon Swindon	Erection of 1 no. dwelling.	BLUNSDON		S/22/1134	1	0	1	1	0	None (Below threshold)	0%	0	0	n/a
T029	3 Church Road Wanborough Swindon SN4 0BZ	Erection of 1no dwelling, refurbishment of barn to form garage/annexe and associated works.	WANBOROUGH		S/22/1817	1	0	1	1	0	None (Below threshold)	0%	0	0	n/a
T030	49 Fleet Street, Swindon, SN1 1RE	Change of use of commercial first floor to a 2 bedroom residential unit with a new side entrance and existing staircase reversed.	CENTRAL SWINDON SOUTH		S/23/0754	1	0	1	1	0	None (Below threshold)	0%	0	0	n/a
T031	The Chalet, Church Row, Hinton Parva, Swindon	Demolition of existing chalet, erection of 1no. dwelling (Class C3), retention of garage and ancillary accommodation and associated works. - Variation of condition 2 from previous application S/23/1069 to amend drawing number showing new positioning of dwelling.	BISHOPSTONE		S/24/0183	1	0	1	1	0	None (Below threshold)	0%	0	0	n/a
T032	26 Manchester Road Swindon SN1 2AB	Change of use of part of ground floor from flat (use class C3) to retail (use class E) and erection of ground floor and first floor rear extensions and dormer window to rear.	CENTRAL SWINDON SOUTH		S/22/0070	-1	0	-1	-1	0	None (Below threshold)	0%	0	0	n/a
T033	48-49 Radnor Street, Kingshill, Swindon	Change of use from Light Industrial (Class E) to Residential (Class C3) and erection of additional storey to the front elevation of 48-49 Radnor Street to form 11 no. Flats and associated works	CENTRAL SWINDON SOUTH		S/21/0655	11	0	11	11	0	None (Below threshold)	0%	0	0	Planning Statement dated 12/04/2021
T034	Burderop Cottage, Hodson Road, Chiseldon, Swindon	Change of use of the Stable Block to 1no. residential dwellings (Use Class C3), together with associated infrastructure and landscaping.	CHISELDON		S/22/1170	1	0	1	1	0	None (Below threshold)	0%	0	0	n/a
T035	156 - 157 Goddard Avenue, Old Town, Swindon	Change of use of ground floor surgery, single storey rear extensions and incorporation of existing upper floor flats to 156 and 157 Goddard Avenue to create 2no. dwellings.	CENTRAL SWINDON SOUTH		S/23/0906	2	0	2	2	0	None (Below threshold)	0%	0	0	n/a
T036	13 Newhall Street, Swindon	Change of Use of 3 bedroom dwelling to 2 No. 1-bed, 1-person flats and 1 No. 1-bed, 2-person flat, and erection of a single- storey side/ rear extension and a first-floor rear extension.	CENTRAL SWINDON SOUTH		S/23/1572	2	0	2	2	0	None (Below threshold)	0%	0	0	n/a
T037	135 Cheney Manor Road, Swindon	Demolition of existing bungalow and erection of replacement bungalow.	CENTRAL SWINDON NORTH		S/24/0298	0	0	1	1	0	None (Below threshold)	0%	0	0	n/a
T038	11 Market Street, Swindon	Change of use of part of retail unit to form 2no. flats.	CENTRAL SWINDON SOUTH		S/24/0603	2	0	2	2	0	None (Below threshold)	0%	0	0	n/a
T039	31 Morley Street, Swindon	Change of use of first floor from restaurant (Class E) to 1no. flat (C3) and first floor rear extension.	CENTRAL SWINDON SOUTH		S/24/0852	1	0	1	1	0	None (Below threshold)	0%	0	0	n/a
T040	Land At Langton Park, Wroughton, Swindon	Erection of 8 no. Dwellings and associated works.	WROUGHTON		S/24/1088	8	0	8	8	0	None (Below threshold)	0%	0	0	n/a
T041	Farm Buildings, Eastrop Farm, Shrivenham Road, Highworth, Swindon	Change of use of agricultural buildings to provide 3no. dwellings, requiring full re- building of building 1, partial re- building of buildings 2 & 3, consolidation works to the granary, restoration of derelict farm workers cottages to provide 2no. dwellings, together with associated access works, parking and landscaping (Variation of Condition 1 from Planning Application S/21/1241 (Appeal Decision: APP/U3935/W/22/3296042).	HIGHWORTH		S/24/1100	3	0	3	3	0	None (Below threshold)	0%	0	0	n/a
T042	Check Inn, 79 Woodland View, Wroughton, Swindon	Change of use of Public House to 5no dwellings (Class C3) with the erection of a two storey extension and demolition of part of single storey extension with associated works.	WROUGHTON		S/24/1170	5	0	5	5	0	None (Below threshold)	0%	0	0	n/a
T043	42 - 45 Fleet Street, Swindon	Change of Use of Ground Floor to facilitate 4 no. Flats (Use Class C3) car parking, external alterations and associated works.	CENTRAL SWINDON SOUTH		S/24/1181	4	0	4	4	0	None (Below threshold)	0%	0	0	n/a
T044	The Albion Sports And Social Club, 62 - 64 Bridge Street, Swindon	Change of use from sports and social club (Sui genesis) to 7 no. flats (C3) and associated works - Variation of conditions 2, 3, 4, from application S/21/0572 - regarding changes to window types	CENTRAL SWINDON SOUTH		S/24/1343	7	0	7	7	0	None (Below threshold)	0%	0	0	n/a
T045	49 Fleet Street/29 John Street, Swindon	External and internal alterations to (consented) Flats 1-6 and commercial floor space, and additional 2 no. storeys proposing 2 flats, and associated works.	CENTRAL SWINDON SOUTH		S/24/1377	2	0	2	2	0	None (Below threshold)	0%	0	0	n/a
T046	Car Park At Comet Way Overtown Wroughton Swindon	Construction of 4no. dwellings and associated landscaping and access.	WROUGHTON		S/23/0167	4	0	4	4	0	None (Below threshold)	0%	0	0	n/a
T047	The Bothy Burderop Park Mansion Drive Swindon	Change of use and extension of gardener's Bothy to a dwelling and walled garden as wholesale nursery and associated works.	CHISELDON		S/22/0595	1	0	1	1	0	None (Below threshold)	0%	0	0	n/a
T048	Land At 20 John Herring Crescent Stratton St Margaret Swindon SN3 4JJ	Erection of 1no. dwelling and associated works.	STRATTON ST. MARGARET		S/22/1659	1	0	1	1	0	None (Below threshold)	0%	0	0	n/a
T049	Priors Farley Farmhouse Rowborough Lane South Marston Swindon SN3 4SX	Demolition of existing dwelling and erection of a replacement dwelling.	SOUTH MARSTON		S/23/0024	0	0	1	1	0	None (Below threshold)	0%	0	0	n/a

T050	31 Lansdown Road Old Town Swindon SN1 3NE	Change of use from 1 no. dwelling to 5 no. flats (class C3), erection of two storey side and rear extension and associated works	CENTRAL SWINDON SOUTH		S/22/1575	4	0	4	4	0	None (Below threshold)	0%	0	0	n/a
T051	Land Adjacent To Fairview Kingsdown Lane Blunsdon Swindon SN25 5DL	Erection of 3no. detached dwellings following Permission in Principle application S/PIP/19/1357.	BLUNSDON		S/22/0705	3	0	3	3	0	None (Below threshold)	0%	0	0	n/a
T052	Land At Kingsdown Lane Blunsdon Swindon SN25 5DL	Erection of 3no. dwellings - technical detail consent following PIP permission S/PIP/19/1356.	BLUNSDON		S/21/1444 (following S/PIP/19/1356)	3	0	3	3	0	None (Below threshold)	0%	0	0	n/a
T053	84 - 86 Cricklade Road Swindon SN2 8AF	Change of Use of bank to Shop/Commercial Use (Class E) with two one bedroom flats (Class C3) at first floor.	CENTRAL SWINDON NORTH		S/22/0165	2	0	2	2	0	None (Below threshold)	0%	0	0	n/a
T054	6 High Street Haydon Wick Swindon SN25 1HX	Erection of 3no. dwellings and associated works.	HAYDON WICK		S/21/1995	3	0	3	3	0	None (Below threshold)	0%	0	0	n/a
T055	Former Pumping Station South View Avenue Old Walcot Swindon	Erection of 2 no. dwellings and associated works.	CENTRAL SWINDON SOUTH		S/21/0013	2	0	2	2	0	None (Below threshold)	0%	0	0	n/a
T056	West Hinton Farm Hinton Parva Lane Hinton Parva Swindon	Change of use of 2no. redundant agricultural buildings, amending permissions S/PAG2R/20/0798 and S/PAG2R/21/0204 to revise the layout in terms of the garden.	BISHOPSTONE		S/21/0732	2	0	2	2	0	None (Below threshold)	0%	0	0	n/a
T057	The Chalet Harrow Close Stratton St Margaret Swindon	Demolition of existing building and erection of 2no. dwellings.	STRATTON ST. MARGARET		S/21/0317	1	0	1	1	0	None (Below threshold)	0%	0	0	n/a
T058	Bluebells Retirement Home, 152 Moredon Road, Moredon, Swindon	Change of use from Care Home (Class C2) to Supported Living Accommodation for 5 people plus staff facilities ((Class C3b) external amendments including access ramps and accessible parking provisions.	CENTRAL SWINDON NORTH		S/24/1136	5	0	5	5	0	None (Below threshold)	0%	0	0	n/a
T059	River Wood, West End Road, Stratton St Margaret, Swindon	Erection of 1 No Dwelling (Design Amendments to previously approved dwelling S/22/0167)	STRATTON ST. MARGARET		S/24/1232	1	0	1	1	0	None (Below threshold)	0%	0	0	n/a
T060	Land At Hill Cottage, Blunsdon Hill, Blunsdon, Swindon	Erection of 16 No. dwellings (Use Class C3) and associated landscaping and infrastructure works comprising a partial replan of the residential development approved under S/21/1338/TB and S/OUT/17/1032/RA.	BLUNSDON		S/23/0883	16	0	16	16	0	None (Provided on previous phases)	0%	0	0	Delegated Report dated 07/06/2024
T061	Land At Marlborough Road Swindon	Reserved Matters Application for appearance, landscaping, layout and scale for 70no. dwellings land at Marlborough Road (Coate, Swindon) pursuant to Outline Planning Permission ref. S/OUT/18/1093.	LIDDINGTON	S/OUT/18/1093	S/RES/21/1026 + S/RES/22/1831	70	38	29	29	0	Off Site (Contribution)	0%	0	0	S.106 (deed of variation) dated 25/03/2025
T062	49 Fleet Street/29 John Street, Swindon	Application for approval of Reserved Matters following Outline consent S/OUT/24/0639 (Demolition of 29 John Street and the single storey link between 29 John Street and 49 Fleet Street. Erection of a 4-storey building to create 4 flats with a communal entrance also providing access to residential conversion from retail use to 2 flats of the first floor and part of the ground floor of 49 Fleet Street.	CENTRAL SWINDON SOUTH	S/OUT/24/0639	S/RES/24/1171	6	0	6	6	0	None (Below threshold)	0%	0	0	n/a
T063	Land At Shrivenham Road, Highworth, Swindon	Reserved matters application (following outline planning permission S/OUT/20/0422) for the erection of 238 dwellings (including 30% affordable housing) with public open space, landscaping and sustainable drainage system (SuDS)	HIGHWORTH	S/OUT/20/0422	S/RES/22/1681	238	0	238	238	0	On site	30%	71	0	Delegated Report dated 26.04.2024
T064	Land At Catsbrain Farm, Highworth Road, Swindon	Erection of 74 no. dwellings and associated works - Reserved Matters from previous outline permission S/OUT/19/0215.	STRATTON ST. MARGARET	S/OUT/19/0215	S/RES/23/0416	74	0	74	74	0	On Site	30%	22	0	S.106 dated 16/04/2020
T065	Land Off Kingsdown Road Kingsdown Road Kingsdown Swindon	Erection of a care village (Class C2) - Reserved Matters from previous permission S/OUT/14/1879.	STRATTON ST. MARGARET	S/OUT/14/1879	S/RES/17/1730	78	0	52	52	0	None (Care)	0%	0	0	S106 dated 05/05/2016
T066	Land At Langton Park, Wroughton, Swindon	Erection of 18 no. dwellings with associated access, parking and landscaping.	WROUGHTON		S/20/1717	18	0	18	18	0	On site	30%	5	0	S.106 dated 28/07/2021
T067	The Old Post Office Thornhill Road South Marston Swindon SN3 4RY	Erection of 1no. dwelling and associated works - Variation of condition 2 (Plans) of planning permission S/22/1693 to include amendments to plans.	SOUTH MARSTON		S/24/0467	1	0	1	1	0	None (Below threshold)	0%	0	0	n/a
T068	98 - 100 Cricklade Road, Swindon	Subdivision of ground floor retail unit to form 2no. Class E units, change of use of first floor and extensions to create 3no. flats (Class C3) and erection of additional second storey to create 3 no. flats (Class C3) and associated works.	CENTRAL SWINDON NORTH		S/21/0665	6	0	6	6	0	None (Below threshold)	0%	0	0	n/a
T069	77 & 78 St Philips Road, Stratton St Margaret, Swindon	Erection of 2no. dwellings, conversion of existing cottages to two annexes and ancillary accommodation and associated works.	STRATTON ST. MARGARET		S/21/0729	2	0	2	2	0	None (Below threshold)	0%	0	0	n/a
T070	Land Adjacent To Berkley Farm House, Swindon Road, Wroughton, Swindon	Erection of 5no. dwellings.	WROUGHTON		S/21/1641	5	0	5	5	0	None (Below threshold)	0%	0	0	n/a
T071	10 High Street, Highworth, Swindon	Change of use from Bar (class Sui- Generis) to 1 no. Flat (class C3).	HIGHWORTH		S/22/1781	1	0	1	1	0	None (Below threshold)	0%	0	0	n/a
T072	Land Adjacent To 58 Richmond Road, Rodbourne Cheney, Swindon	Demolition of garages / outbuilding and erection of 2no dwellings (Class C3) and associated works.	CENTRAL SWINDON NORTH		S/22/1804	2	0	2	2	0	None (Below threshold)	0%	0	0	n/a
T073	Dental Surgery, 16 Moredon Road, Moredon, Swindon	Demolition of garages and the erection of 1 no. 2-bedroom dwelling with associated car parking, together with internal reconfiguration of the existing dental clinic including re-instating the front entrance.	CENTRAL SWINDON NORTH		S/22/1841	1	0	1	1	0	None (Below threshold)	0%	0	0	n/a
T074	92 Gypsy Lane, Swindon	Erection of 1no dwelling.	CENTRAL SWINDON NORTH		S/23/0183	1	0	1	1	0	None (Below threshold)	0%	0	0	n/a

T075	Land Adjacent To 5 Barnfield Close, Rodbourne, Swindon	Erection of 2no dwellings.	CENTRAL SWINDON NORTH		S/23/0205	2	0	2	2	0	None (Below threshold)	0%	0	0	n/a
T076	Land To The Rear Of 89 Kingsdown Road, Kingsdown, Swindon	Erection of a detached dwelling.	STRATTON ST. MARGARET		S/23/0390	1	0	1	1	0	None (Below threshold)	0%	0	0	n/a
T077	Marlborough Park (Phase 2), Pipers Way, Old Town, Swindon	Erection of 80 dwellings and associated access, open space and infrastructure (alterations and increase in unit number over the previously approved scheme (S/18/0181)).	CENTRAL SWINDON SOUTH		S/21/0925	80	0	80	80	0	On site	30%	24	0	S.106 dated 23/01/2025
T078	Brunel House, 52 Havelock Street, Swindon	Change of Use of existing first and second floors from Retail to Residential and the addition of a further two floors to provide a total of 10nos 1-bed, 1-person flats and 2nos 2-bed, 3-persons flats.	CENTRAL SWINDON SOUTH		S/23/0457	12	0	12	12	0	None (Below threshold)	0%	0	0	Delegated Report dated 30/08/2024
T079	Westwood House, Belmont Crescent, Old Town, Swindon	Erection of a single storey annexe to provide 1no. supported living unit and single storey rear extension.	CENTRAL SWINDON SOUTH		S/23/0544	1	0	1	1	0	None (Below threshold)	0%	0	0	n/a
T080	32 Morley Street, Swindon	Change of use of first floor from office (Class E) to 1no flat (C3) and first floor rear extension.	CENTRAL SWINDON SOUTH		S/23/0671	1	0	1	1	0	None (Below threshold)	0%	0	0	n/a
T081	The Boundary House, 1 The Street, Moredon, Swindon	Change of use of existing pub (Use Class Sui Generis) to 4no. residential apartments and development of 5no. new residential dwellings including associated parking and landscaping.	HAYDON WICK		S/23/0982	9	0	9	9	0	None (Below threshold)	0%	0	0	n/a
T082	Duke Of Edinburgh P H, Cricklade Road, Swindon	Change of use of existing pub (Use Class Sui Generis) to 3 no. apartments and 1 no. dwelling, and development of 4 no. apartments including associated parking and landscaping.	CENTRAL SWINDON NORTH		S/23/0983	8	0	8	8	0	None (Below threshold)	0%	0	0	n/a
T083	First Floor, 21 - 22 Regent Street, Swindon	Erection of an additional floor with conversion of 1st floor to 4 no. self contained flats and associated works.	CENTRAL SWINDON SOUTH		S/23/1188	4	0	4	4	0	None (Below threshold)	0%	0	0	n/a
T084	18 - 20 Commercial Road, Swindon	Change of use of first and second floors (Class E(c)) to form 6 no. flats (Class C3) and associated works.	CENTRAL SWINDON SOUTH		S/23/1200	6	0	6	6	0	None (Below threshold)	0%	0	0	n/a
T085	Lynt Farm, Lynt Farm Lane, Inglesham, Swindon	Erection of a dwelling and associated works (revised scheme).	INGLESHAM		S/23/1344	1	0	1	1	0	None (Below threshold)	0%	0	0	n/a
T086	1 The Beeches, Lady Lane, Swindon	Demolition of garage and erection of 2no dwellings (Class C3) and associated works.	STANTON FITZWARREN		S/23/1415	2	0	2	2	0	None (Below threshold)	0%	0	0	n/a
T087	Land Adjacent To 9 Deerhurst Way, Toothill, Swindon	Erection of an attached dwelling.	WEST SWINDON		S/23/1551	1	0	1	1	0	None (Below threshold)	0%	0	0	n/a
T088	2 Queens Drive, Swindon	Retention of 1no. shop (Class E(a), with the erection of extensions to form 9no flats (Class C3) and associated works.	CENTRAL SWINDON SOUTH		S/24/0130	9	0	9	9	0	None (Below threshold)	0%	0	0	n/a
T089	Land At Moredon Recreation Ground, Cheney Manor Industrial Estate, Cheney Manor, Swindon	Erection of 66no. dwellings, creation of access, landscaping, infrastructure and associated works.	CENTRAL SWINDON NORTH		S/24/0170	66	0	66	66	0	On site	30%	20	0	S.106 dated 23/01/2025
T090	348 Cricklade Road, Swindon	Change of Use of the residential dwelling to 2no. 1-bed flats	CENTRAL SWINDON NORTH		S/24/0289	1	0	1	1	0	None (Below threshold)	0%	0	0	n/a
T091	77 County Road, Swindon	Change of use from single dwelling to 4no flats.	CENTRAL SWINDON SOUTH		S/24/0296	3	0	3	3	0	None (Below threshold)	0%	0	0	n/a
T092	Land Adjacent To Chacewater, The Pitchens, Wroughton, Swindon	Change of use of existing buildings (Sui Generis) with first floor extension to form 1no. dwelling (Class C3).	WROUGHTON		S/24/0435	1	0	1	1	0	None (Below threshold)	0%	0	0	n/a
T093	161-162 Victoria Road, Old Town, Swindon	Alterations to front and rear elevations with infill extension between 2 no. properties to integrate into one, with the erection of railings to front.	CENTRAL SWINDON SOUTH		S/24/0455	-1	0	-1	-1	0	None (Below threshold)	0%	0	0	n/a
T094	23 High Street, Wroughton, Swindon	Erection of 1.no dwelling and all associated drainage and landscaping works.	WROUGHTON		S/24/0501	1	0	1	1	0	None (Below threshold)	0%	0	0	n/a
T095	188 County Road, Swindon	Conversion of a 3 bedroom house to two flats.	CENTRAL SWINDON SOUTH		S/24/0550	1	0	1	1	0	None (Below threshold)	0%	0	0	n/a
T096	1 Westleaze, Mill Lane, Swindon	Proposed demolition and redevelopment of Cattery site and conversion of modern barn to create 4 new dwellings and ancillary communal studio / gym space.	WROUGHTON		S/24/0607	4	0	4	4	0	None (Below threshold)	0%	0	0	n/a
T097	Land Adjacent To Redlands Court Bungalow, Swindon Road, Highworth, Swindon	Erection of 1.no detached dwelling and associated works.	HIGHWORTH		S/24/0641	1	0	1	1	0	None (Below threshold)	0%	0	0	n/a
T098	76A, 76 Cricklade Road, Swindon	Change of use from Hair and Beauty Salon at first floor above a shop (Use Class E) to 2 no. self- contained Flats with associated Bin Storage and Bicycle Parking (C3).	CENTRAL SWINDON NORTH		S/24/0745	2	0	2	2	0	None (Below threshold)	0%	0	0	n/a
T099	5 Temple Chambers, Temple Street, Swindon	Change of use (E use) offices to 6no. residential flats (C3 use).	CENTRAL SWINDON SOUTH		S/24/0970	6	0	6	6	0	None (Below threshold)	0%	0	0	n/a
T100	Land To The Rear Of Swindon Road And East Of Eastcott Hill, Swindon	Erection of 5 no. dwellings with associated parking, landscaping and ancillary works.	CENTRAL SWINDON SOUTH		S/24/1007	5	0	5	5	0	None (Below threshold)	0%	0	0	n/a
T101	Land At Hermitage Lane, Stratton St Margaret, Swindon	Erection of 1no detached chalet bungalow (Class C3) and associated works.	STRATTON ST. MARGARET		S/24/1040	1	0	1	1	0	None (Below threshold)	0%	0	0	n/a
T102	1 Groundwell Road, Swindon	Change of use from commercial use (Class E) to form 1 no. dwelling (Class C3) and associated works.	CENTRAL SWINDON SOUTH		S/24/1045	1	0	1	1	0	None (Below threshold)	0%	0	0	n/a
T103	2 Sword Avenue, Highworth, Swindon	Erection of 4no dwellings and associated works.	HIGHWORTH		S/24/1130	4	0	4	4	0	None (Below threshold)	0%	0	0	n/a
T104	West Cottage, 64 The Street, Liddington, Swindon	Erection of 1 no. detached dwelling, removal of existing detached garage, with creation of a new drive/parking area utilising an existing highway access, external alterations to the existing cottage, and various related external works including associated landscaping.	LIDDINGTON		S/24/1147	1	0	1	1	0	None (Below threshold)	0%	0	0	n/a
T105	Land At 1 Stuart Close, Walcot, Swindon	Demolition of 2no. dwellings and erection of 3no. dwellings including associated hard and soft landscaping and amenities.	CENTRAL SWINDON SOUTH		S/24/1150	1	0	1	1	0	None (Below threshold)	0%	0	0	n/a
T106	Land At 6 Holly Close, Rodbourne Cheney, Swindon	Demolition of 2no. dwellings and erection of replacement 2no. dwellings including associated hard and soft landscaping and amenities.	CENTRAL SWINDON NORTH		S/24/1151	0	0	0	0	0	None (Below threshold)	0%	0	0	n/a

T107	42 - 45 Fleet Street, Swindon	Erection of an additional storey and alterations to external appearance to form 15 no. person House in Multiple Occupation (Sui Generis) and associated works.	CENTRAL SWINDON SOUTH		S/24/1376	1	0	1	1	0	None (Below threshold)	0%	0	0	n/a
T108	Unit 38 Stanley House, Bramble Road, Elgin, Swindon	External and internal alterations to building in connection with the approved change of use from offices (Class E) to 28 no. residential units (Class C3) granted under Prior Approval application S/PAOTH/24/0768.	CENTRAL SWINDON NORTH		S/24/1231	28	0	28	28	0	None (PD - MA class)	0%	0	0	Planning Statement dated 18/10/2024
T109	45 Manchester Road, Swindon	Conversion of existing dwelling (Class C3) into 4no. Flats, erection of two storey and single storey rear extensions and demolition of garage.	CENTRAL SWINDON SOUTH		S/24/1191	3	0	3	3	0	None (Below threshold)	0%	0	0	n/a
T110	16-18 Havelock Square, Swindon	Change of use at Ground Floor (Sui Generis) to form 7 no. Flats (Class C3), a Retail Unit (Class E) and associated works.	CENTRAL SWINDON SOUTH		S/24/1315	7	0	7	7	0	None (Below threshold)	0%	0	0	n/a
T111	Burton Grove Farm, Highworth Road, South Marston, Swindon	Change of use of swimming pool building to 2no. dwellings.	SOUTH MARSTON		S/24/1430	2	0	2	2	0	None (Below threshold)	0%	0	0	n/a
T112	31 Hunt Street, Old Town, Swindon	Change of use of single dwelling to create 2 no. flats, proposed decking and panel surrounds, proposed external staircase and proposed conversion of garage.	CENTRAL SWINDON SOUTH		S/24/1442	1	0	1	1	0	None (Below threshold)	0%	0	0	n/a
T113	Coachbuilders House, Stratton Road, Stratton St Margaret, Swindon	Conversion of roof including the provision of new fenestration to form 8 flats.	CENTRAL SWINDON SOUTH		S/24/1456	8	0	8	8	0	None (Below threshold)	0%	0	0	n/a
T114	County House Residential Home 143-145 County Road Swindon SN1 2EB	Change of use from 4no to 8no flats together with ground and first floor rear extensions.	CENTRAL SWINDON SOUTH		S/23/0963	4	0	4	4	0	None (Below threshold)	0%	0	0	n/a
T115	Sn1 Station Road Swindon	Change of use of part of the ground floor and the entire second, third and fourth floor of the building to provide 40 no. Flats.	CENTRAL SWINDON SOUTH		S/23/0679	40	0	40	40	0	None (Viability)	0%	0	0	Delegated Report dated 20/05/2024
T116	16 - 17 Regent Street Swindon	Demolition and erection of 1 additional storey to create 4 no flats (Class C3) and associated works.	CENTRAL SWINDON SOUTH		S/23/0316	4	0	4	4	0	None (Below threshold)	0%	0	0	n/a
T117	Old Town Court 10 - 14 High Street Old Town Swindon SN1 3EP	Change of use of ground, first and second floors from Commercial use (Class E) to 20no flats (Class C3) and associated works.	CENTRAL SWINDON SOUTH		S/23/0439	20	0	20	20	0	None (Viability)	0%	0	0	Delegated Report dated 28/11/2023
T118	253 Marlborough Road Swindon SN3 1NW	Demolition of existing garage and erection of 1 no. dwelling.	CENTRAL SWINDON SOUTH		S/23/1149	1	0	1	1	0	None (Below threshold)	0%	0	0	n/a
T119	113 The Broadway Rodbourne Cheney Swindon	Certificate of Lawfulness (Proposed) for the change of use from dwelling (use class C3) to care home (Use class C3b).	CENTRAL SWINDON NORTH		S/LDP/23/0739	0	0	1	1	0	None (Below threshold)	0%	0	0	n/a
T120	Southbrook House Southbrook Street Rodbourne Cheney Swindon SN2 1HF	Erection of 1 No. bungalow and associated works.	CENTRAL SWINDON NORTH		S/23/0031	1	0	1	1	0	None (Below threshold)	0%	0	0	n/a
T121	21 Cherry Orchard Highworth Swindon SN6 7AU	Erection of 1no. dwelling (Class C3) and associated works.	HIGHWORTH		S/22/1526	1	0	1	1	0	None (Below threshold)	0%	0	0	n/a
T122	10-14 High Street Old Town Swindon SN1 3EP	Change of use of part of first and second floors from Commercial use (Class E) to 6no flats (Class C3), with retention of part of ground floor for Class E use along with associated works.	CENTRAL SWINDON SOUTH		S/22/1477	6	0	6	6	0	None (Below threshold)	0%	0	0	n/a
T123	Bartrop Yard Westrop Highworth Swindon SN6 7HJ	Erection of 1no. dwelling and associated works.	HIGHWORTH		S/22/1418	1	0	1	1	0	None (Below threshold)	0%	0	0	n/a
T124	Former Stratton Reform Club 136 Beechcroft Road Swindon SN2 7QE	Change of Use from former working mens club (class E(d)) to form 5 no. 1-bed units (class C3) and associated works.	STRATTON ST. MARGARET		S/23/0320	5	0	5	5	0	None (Below threshold)	0%	0	0	n/a
T125	Car Park Rear, 174 Victoria Road, Old Town, Swindon	Erection of a two-storey building for 4no. 2-bed flats (Use Class C3) and associated site works.	CENTRAL SWINDON SOUTH		S/23/1411	4	0	4	4	0	None (Below threshold)	0%	0	0	n/a
T126	23 High Street, Wroughton, Swindon	Partial change of use of existing office building to 1 no. flat, with commercial floor space retained at the front ground floor level, and the erection of 1 no. dwelling to the rear of the site and associated works.	WROUGHTON		S/23/0133	2	0	2	2	0	None (Below threshold)	0%	0	0	n/a
T127	Car Park Rear, 174 Victoria Road, Old Town, Swindon	Erection of 2no residential units (C3), car parking facilities and ancillary works.	CENTRAL SWINDON SOUTH		S/23/0010	2	0	2	2	0	None (Below threshold)	0%	0	0	n/a
T128	Kingsdown Court Kingsdown Road Kingsdown Swindon SN3 4TD	Erection of 10 No. sheltered apartments (C3) with ancillary communal facilities and associated works (Revised Submission)	CENTRAL SWINDON SOUTH		S/22/1422	10	0	10	10	0	None (Below threshold)	0%	0	0	AH not mentioned/ secured in application documentation
T129	Starveal Barn, Coleshill Road, Highworth, Swindon	Alteration, conversion and partial demolition of existing barns to provide 1 no. dwelling and associated ancillary development. Variation of condition 2 (Plans) from previous application S/24/0036.	HIGHWORTH		S/24/0937	1	0	1	1	0	None (Below threshold)	0%	0	0	n/a
T130	5 Temple Chambers, Second Floor, Temple Street, Swindon	Change of use and conversion of second floor (B1 use) offices to form 2no. residential flats (C3 use)	CENTRAL SWINDON SOUTH		S/22/0875	2	0	2	2	0	None (Below threshold)	0%	0	0	n/a
T131	Manor Farm, 47 Queens Road, Hannington	Demolition of buildings, and erection of 8no. dwellings and employment building (Use Class E(g)), conversion and alteration of stables and barn to employment (Use Class E(g)) including access and parking (revisions to the design and layout of the development approved under S/17/1114).	HANNINGTON		S/20/1157	8	0	8	8	0	None (Below threshold)	0%	0	0	n/a
T132	Wroughton Methodist Church High Street Wroughton Swindon SN4 9JX	Change of Use of existing chapel from Use Class F1 (learning and non-residential institutions) to Use Class C3 (Residential) to provide 2 no. dwellings and associated works.	WROUGHTON		S/22/1191	2	0	2	2	0	None (Below threshold)	0%	0	0	n/a

T133	49 - 51 Regent Street Swindon SN1 1JS	Erection of a further two storeys and Change of Use of first floor (use class E) to provide 9no. self-contained residential units (use class C3).	CENTRAL SWINDON SOUTH		S/22/0597	9	0	9	9	0	None (Below threshold)	0%	0	0	n/a
T134	Caretakers House Greenmeadow School Pen Close Swindon SN25 3LW	Change of Use from residential (use class C3) to school use (use class F1).	HAYDON WICK		S/22/0044	-1	0	-1	-1	0	None (Below threshold)	0%	0	0	n/a
T135	115 Cricklade Road Swindon SN2 1AB	Change of Use of ground floor from betting shop (sui generis) and existing first floor 2 bedroom flat to residential (C3) 4no. 1bedroom flats and associated works.	CENTRAL SWINDON NORTH		S/22/0930	3	0	3	3	0	None (Below threshold)	0%	0	0	n/a
T136	19 Covingham Square Covingham Swindon SN3 5AA	Demolition of existing buildings; construction of mixed use building to provide a dental surgery on the ground floor with 12 flats on first and second floors; and construction of parking and turning areas.	COVINGHAM		S/21/1417	12	0	12	12	0	None (Below threshold)	0%	0	0	AH not mentioned/ secured in application documentation
T137	72 Victoria Road Old Town Swindon SN1 3BB	Change of Use of basement from office (Class E) to 1no studio flat (Class C3) and Change of Use of first & second floors from offices (Class E) to 1no two bedroom flat (Class C3).	CENTRAL SWINDON SOUTH		S/22/0340	2	0	2	2	0	None (Below threshold)	0%	0	0	n/a
T138	Former Dannah House Bakers Road WROUGHTON Nughton Swindon	Demolition of former Dannah House and erection of 4no. dwellings and associated works.	WROUGHTON		S/19/1673	4	0	4	4	0	None (Below threshold)	0%	0	0	n/a
T139	31 Crombey Street Swindon SN1 5QL	Erection of a two storey/single storey rear extension and Change of Use of dwelling to 2no. flats and associated works.	CENTRAL SWINDON SOUTH		S/22/0206	1	0	1	1	0	None (Below threshold)	0%	0	0	n/a
T140	Land At Burytown Lane Burytown Lane Blunsdon Swindon SN26 7DQ	Erection of 2no. dwellings and associated works.	BLUNSDON		S/21/1529	2	0	2	2	0	None (Below threshold)	0%	0	0	n/a
T141	9 Market Street Swindon SN1 1RZ	Change of Use from first floor offices (use class E) to dwelling (use class C3) with dormer window to rear, 2no. velux rooflights to front and external staircase to rear.	CENTRAL SWINDON SOUTH		S/21/1934	1	0	1	1	0	None (Below threshold)	0%	0	0	n/a
T142	Oak And Ash House Brimble Hill, Wroughton	Kept live by S/LDP/17/1982 - Demolition of existing buildings and erection of 4no. detached dwellings. Kept live by Commencement Condition.	WROUGHTON		S/13/0966	3	0	3	3	0	None (Below threshold)	0%	0	0	n/a
T143	Regent Hotel 151-152 Victoria Road Old Town Swindon SN1 3BU	Erection of two storey/ first floor rear extension and Change of Use of hotel (use class C1) to 2no (5no. bed) HMO's (use class C4) and 12no. apartments with associated external alterations and replacement roof.	CENTRAL SWINDON SOUTH		S/22/0389	14	0	14	14	0	None (Below threshold)	0%	0	0	AH not mentioned/ secured in application documentation
T144	39-45 Fleet Street Swindon SN1 1RE	Partial demolition and retention of 6no commercial units (Class E) on the ground floor, and erection of additional storey (third floor) to create 6no apartments (Class C3) incorporating internal access, associated car parking, external alterations and other associated works	CENTRAL SWINDON SOUTH		S/22/1339	6	0	6	6	0	None (Below threshold)	0%	0	0	n/a
T145	10 Melbourne Close, Lawn, Swindon	Erection of 1 No. detached dwelling (C3) and associated works - (Variation of Condition 2 - Approved Plans from Application S/21/1054 to alter the approved design).	CENTRAL SWINDON SOUTH		S/24/0691	1	0	1	1	0	None (Below threshold)	0%	0	0	n/a
T146	Land to the rear of Woodland View, Wroughton, Swindon	Erection of 104no. dwellings, traffic roundabout, roads and associated works - Reserved Matters from previous outline permission S/OUT/20/0556.	WROUGHTON	S/OUT/20/0556	S/RES/20/0555	104	0	104	104	0	On site	30%	31	0	S106 dated 014/02/2018
T147	2 Swindon Road, Highworth, Swindon	Application for approval of reserved matters in relation to appearance, landscaping, layout and scale from previous Outline Planning Application S/OUT/18/1067 - Erection of 3 no. bungalows and associated works - Variation of condition 1 of S/RES/20/1140 to allow for removal and replacement of yew trees and the erection of a 1.8m high close boarded fence.	HIGHWORTH	S/OUT/18/1067	S/22/1578	3	0	3	3	0	None (Below threshold)	0%	0	0	n/a
T148	24-26 Fleet Street, Swindon	Reserved matters application following outline planning permission (S/OUT/20/0260) relating to the appearance, landscaping and scale of 25no apartments and 2no commercial units.	CENTRAL SWINDON SOUTH	S/OUT/20/0260	S/RES/23/1007	25	0	25	25	0	None (Viability)	0%	0	0	Delegated Report dated 13/07/2021
T149	Phase 2 Redlands Park Swindon Road Highworth Swindon	Erection of 42no. dwellings and associated works - Reserved Matters from previous permission S/OUT/20/0724.	HIGHWORTH	S/OUT/20/0724	S/RES/22/0885	42	0	42	42	0	On Site	30%	13	0	S.106 (deed of variation) dated 15/05/2025
T150	Land Off Shrivenham Road, Shrivenham Road, Highworth, Swindon	Approval of Reserved Matters pursuant to Outline planning permission (S/OUT/20/1046/SASM) for the erection of 60 no. dwellings and associated works for Appearance, Landscaping, Layout and Scale.	HIGHWORTH	S/OUT/20/1046/SASM	S/RES/24/0519	60	0	60	60	0	On site	30%	18	0	Housing Comments dated 01/08/2024
T151	20 Fleet Street Swindon SN1 1RQ	Erection of a two-storey rear extension and Change of Use from public house (use class A4) to mixed use comprising commercial and business use (Class E), 2no. 5-bedroom Houses in Multiple Occupation (HMO) (Class C4) and 10no. apartments (Class C3) including alterations to windows and doors.	CENTRAL SWINDON SOUTH		S/22/0424	12	0	12	12	0	None (Below threshold)	0%	0	0	AH not mentioned/ secured in application documentation
T152	27 County Road, Swindon	Change of use from residential dwelling to 8 no. HMO with dormer window, first floor rear extension and single storey rear extension.	CENTRAL SWINDON SOUTH		S/23/0962	0	0	1	1	0	None (Below threshold)	0%	0	0	n/a
T153	38A & 38B Deacon Street, Swindon	Change of use and erection of additional storey to form a 7 person HMO (Sui generis) and associated works.	CENTRAL SWINDON SOUTH		S/24/1415	1	0	1	1	0	None (Below threshold)	0%	0	0	n/a

T154	Letcombe Villa 5A Wesley Street Old Town Swindon SN1 3LF	Change of Use of 6no. bedroom dwelling to a 8no. bedroom (8 persons) H.M.O.	CENTRAL SWINDON SOUTH		S/21/1825	0	0	0	0	0	None (Below threshold)	0%	0	0	n/a
T155	76 - 78 Bath Road Old Town Swindon	Change of use from 1no. dwelling (78 Bath Road) to 9-persons (8 bedrooms) house in multiple occupation (HMO) plus single storey extensions to 76 and 78 Bath Road to create 2no. studios/ apartments.	CENTRAL SWINDON SOUTH		S/20/0618	0	0	1	1	0	None (Below threshold)	0%	0	0	n/a
T156	(Royal Air Force Association) 41 - 43 Belle Vue Road Old Town Swindon SN1 3HN	Change of use of former working mens club (Class E(d)) to 3no HMOs (House in Multiple Occupancy) (Sui Generis), incorporating first floor rear extension, increase in existing roof height and associated works.	CENTRAL SWINDON SOUTH		S/23/1151	3	0	3	3	0	None (Below threshold)	0%	0	0	n/a
T157	39 Bath Road Old Town Swindon SN1 4AS	Change of use from offices (Class E) to a 9 person HMO (sui generis) and associated works.	CENTRAL SWINDON SOUTH		S/23/1481	1	0	1	1	0	None (Below threshold)	0%	0	0	n/a
T158	First Floor, 140 - 142 Cricklade Road, Swindon	Change of use of first floor from storage ancillary to café/catering company (E class use) to a small 5 bed HMO (C4 class use).	CENTRAL SWINDON SOUTH		S/23/0769	1	0	1	1	0	None (Below threshold)	0%	0	0	n/a
T159	Prospect Quarter, 61 Prospect Place, Old Town, Swindon	Change of use of ancillary/parking area (Class C3) to form 6 person House in Multiple Occupation (Class C4), single storey extensions to provide cycle storage and associated works.	CENTRAL SWINDON SOUTH		S/24/1410	1	0	1	1	0	None (Below threshold)	0%	0	0	n/a
T160	31 Victoria Road Old Town, Swindon	Change of use from offices (use class E) to a 9no. bedroom house in multiple occupation (sui generis), erection of a three - storey rear extension and 1no. rear dormer window - revision to previous permission S/21/1582 - Variation of approved plans from Planning Permission S/22/0560.	CENTRAL SWINDON SOUTH		S/23/0530	1	0	1	1	0	None (Below threshold)	0%	0	0	n/a
T161	First Floor, 140 - 142 Cricklade Road, Swindon	Change of use of first floor from storage ancillary to café/catering company (E class use) to a small 5 bed HMO (C4 class use).	CENTRAL SWINDON NORTH		S/23/0769	1	0	1	1	0	None (Below threshold)	0%	0	0	n/a
T162	Abbey Stadium Lady Lane Swindon	Erection of 127no. dwellings and associated landscape and infrastructure works - reserved matters from permission S/12/1826.	BLUNSDON ST ANDREWS	S/12/1826	S/RES/18/1311	127	0	0	0	0	None (Below threshold)	100%	0	0	AH not mentioned/ secured in application documentation
T163	Farm Buildings Eastrop Farm, 105 Eastrop, Highworth, Swindon	Change of use of existing agricultural buildings and restoration of derelict farmworkers cottages to provide 5 no. dwellings	HIGHWORTH		S/17/1023	5	0	0	0	0	None (Below threshold)	0%	0	0	n/a
T164	5 Temple Chambers Temple Street Swindon	Change of use of ground & first floors (E use) offices to form 4no. residential flats (C3 use).	CENTRAL SWINDON SOUTH		S/21/0567	4	0	0	0	0	None (Below threshold)	0%	0	0	n/a
T165	Sulvadene Quarry Road Old Town Swindon	Demolition of existing bungalow and erection of 10no. assisted living flats (Use Class C2).	CENTRAL SWINDON SOUTH		S/20/0379	9	0	0	0	0	None (Below threshold)	0%	0	0	Delegated Report dated 14/03/2022
T166	61 Meadowcroft Stratton St Margaret Swindon	Sub-division of existing shop (Use Class E) to shop (Use Class E) and take away (Sui Generis), installation of extractor flue, change of use of existing ground floor storage area to 1no. flat and erection of first floor side/ rear extension to provide 1no. additional flat	STRATTON ST. MARGARET		S/21/0356	2	0	0	0	0	None (Below threshold)	0%	0	0	n/a
T167	Land To The Rear Of 1 & 2 Park Lane Swindon	Erection of 1no. dwelling.	CENTRAL SWINDON SOUTH		S/21/0459	1	0	0	0	0	None (Below threshold)	0%	0	0	n/a
T168	Land At 52 Priors Hill Wroughton Swindon	Erection of 1no. detached dwelling, part removal of existing front boundary wall and associated works	Wroughton		S/20/0974	1	0	0	0	0	None (Below threshold)	0%	0	0	n/a
T169	Land To The Rear Of 1 & 3 Green Road Upper Stratton Swindon	Erection of 2no. dwellings and associated works	STRATTON ST. MARGARET		S/20/0174	2	0	0	0	0	None (Below threshold)	0%	0	0	n/a
T170	Land At Badbury House Farm, Badbury Lane, Badbury, Swindon	Erection of 5no. dwellings with parking and associated works.	CHISELDON		S/18/1160	5	0	0	0	0	None (Below threshold)	0%	0	0	n/a
T171	76 - 78 Bath Road Old Town Swindon	Change of use from 1no. dwelling (78 Bath Road) to 9-persons (8 bedrooms) house in multiple occupation (HMO) plus single storey extensions to 76 and 78 Bath Road to create 2no. studios/ apartments.	CENTRAL SWINDON SOUTH		S/20/0618	2	0	0	0	0	None (Below threshold)	0%	0	0	n/a
Totals						1,859	202	1,418	1,418	0			215	0	

Turley Ref.	Site Address	Development proposal	Parish	RM / FULL	Units (Net)	Dwellings completed 2024/25	Net to be taken into trajectory	Expected Net Supply		AH Contribution Type	On Site AH %age	Projected Gross AH Supply		Source
								2025/26 - 2029/30	2030/31 onwards			2025/26 - 2029/30	2030/31 onwards	
T172	Former UK Life Centre Station Road Swindon	Prior approval application for the erection of a further two storeys to provide 62no. flats.	CENTRAL SWINDON SOUTH	S/PAOTH/21/0255	62	0	35	62	0	None (PD)	0%	0	0	Delegated Report dated 14/05/2021
T173	The Forum Marlborough Road Swindon SN3 1QN	Prior Approval Notification forChange of Use to 15no. apartments (class C3)	CENTRAL SWINDON SOUTH	S/PAOTH/22/0321	15	0	15	15	0	None (PD)	0%	0	0	Delegated Report dated 11/11/2022
T174	99-100 Victoria Road, Old Town, Swindon	Prior notification application for the change of use from office (Class B1) to 19no. dwellinghouses (Class C3). See also S/19/0442 adjacent site	CENTRAL SWINDON SOUTH	S/PO2R/20/0047	19	0	19	19	0	None (PD)	0%	0	0	Delegated Report dated 30/10/2020
T175	Former Uk Life Centre Station Road Swindon	Prior Approval Notification for the change of use from offices (Class B1a) to 170 no. residential flats (Class C3).	CENTRAL SWINDON SOUTH	S/PO2R/21/1257	170	0	100	170	0	None (PD)	0%	0	0	Delegated Report dated 10/11/2021
T176	Floors 4-9 Inclusive Falcon House Fleming Way Swindon	Prior Approval Notification for the change of use from offices (Class B1a) to 65no. residential flats (Class C3).	CENTRAL SWINDON SOUTH	S/PO2R/21/1301	65	0	35	65	0	None (PD)	0%	0	0	Delegated Report dated 24/09/2021
T177	34-35 Regent Circus & 128-129 Commercial Road Swindon SN1 1PY	Prior Approval Notification forChange of Use of first and second floors from offices (Class E(g)) to 10 No residential flats (Class C3) & associated works including designated cycle store in the existing courtyard.	CENTRAL SWINDON SOUTH	S/PO2R/23/0162	10	0	5	10	0	None (PD)	0%	0	0	Delegated Report dated 27/03/2023
T178	Horpit Farm, Horpit Wanborough Swindon	Prior Approval application for the change of use of 1no. agricultural barn to 1no. dwelling (Class C3) with associated demolition and building works.	WANBOROUGH	S/PAG2R/21/0586	1	0	1	1	0	None (Below threshold)	0%	0	0	n/a
T179	Honeyfield Farm The Marsh Wanborough Swindon SN4 0AR	Prior Approval Notification for the change of use of an agricultural building to residential (Class Q).	WANBOROUGH	S/PAOTH/23/1476	1	0	1	1	0	None (Below threshold)	0%	0	0	n/a
T180	Lushill Farm Lushill Lane Hannington Swindon SN6 7TA	Prior Approval application for the change of use of 2no. agricultural barns to 2no. dwellings with associated demolition and building works.	CASTLE EATON	S/PAG2R/23/0312	2	0	2	2	0	None (Below threshold)	0%	0	0	n/a
T181	Unit B The Dorcan Complex Faraday Road Dorcan Swindon	Prior Approval Notification for the change of use from business use (Class E) to 15 residential flats (Class C3) with associated works.	NYTHE, ELDENE AND LIDEN	S/PAOTH/24/0942	15	0	15	15	0	None (PD)	0%	0	0	Delegated Report dated 08/10/2024
T182	6 Regent Street & 1 College Street Swindon	Prior Approval Notification for the change of use of first floor former retail area to 2no. apartments.	CENTRAL SWINDON SOUTH	S/PAOTH/23/1414	2	0	2	2	0	None (Below threshold)	0%	0	0	n/a
T183	Unit 9 Lancaster Place Swindon	Prior Approval application for the Change of Use of building from commercial (Use Class E) to 26 nos flats (20 nos 1- bedroom apartments and 6 nos studio apartments) (Use Class C3) and associated works.	SOUTH MARSTON	S/PAOTH/24/1190	26	0	20	26	0	None (PD)	0%	0	0	Delegated Report dated 05/12/2024
T184	Enterprise House Cheney Manor Industrial Estate Cheney Manor Swindon	Prior Approval Notification for the change of use of existing offices (Class E) to 9 residential dwellings (Class C3).	CENTRAL SWINDON NORTH	S/PO2R/24/0801	9	0	5	9	0	None (Below threshold)	0%	0	0	n/a
T185	54 Commercial Road Swindon	Prior Approval for the change of use from Commercial (Class E) to 4 no. residential units (Class C3).	CENTRAL SWINDON SOUTH	S/PO2R/24/0901	4	0	2	4	0	None (Below threshold)	0%	0	0	n/a
T186	Oxford And Trinity House 1 & 2 College Court Swindon	Prior Approval Notification for the change of use of first, second, third and part fourth floor from offices (Use Class E) to 10 no. 1 bedroom flats (Use Class C3).	CENTRAL SWINDON SOUTH	S/PO2R/24/1275	10	0	5	10	0	None (PD)	0%	0	0	Delegated Report dated 19/12/2024
T187	16 - 17 Regent Street, Swindon	Prior Approval application for the change of use of first and second floors from Use Class E to 8no flats (C3 Residential).	CENTRAL SWINDON SOUTH	S/PAOTH/24/0847	8	0	5	8	0	None (Below threshold)	0%	0	0	n/a
T188	Lushill Farm House Lushill Farm Lushill Lane Hannington Swindon SN6 7TA	Prior Approval application for the demolition of the cottage and attached single storey bathroom.	CASTLE EATON	S/DEM/23/1517	-1	0	-1	-1	0	None (Below threshold)	0%	0	0	n/a
T189	Hi Tech House 2 Eastcott Road Old Town Swindon SN1 3LS	Prior Approval Notification for the change of use of office (Class E) to residential (Class C3) - It is noted that only the ground floor of the premises was used for office use whilst the upstairs has been used as an apartment	CENTRAL SWINDON SOUTH	S/PAOTH/23/0490	0	0	0	0	0	None (Below threshold)	0%	0	0	n/a
T190	13 Regent Street Swindon SN1 1JQ	Prior Approval Notification for the change of use of first and second floors (Use Class E) to form 2 no. Flats (Class C3) and associated works.	CENTRAL SWINDON SOUTH	S/PO2R/23/0311	2	0	2	2	0	None (Below threshold)	0%	0	0	n/a
T191	Sn1 Station Road Swindon	Prior Approval Notification for the Change of Use of ground floor from office to 9no residential units (Class C3), with retention of 1no office on ground floor and Change of Use of first floor from office to 11no residential units (Class C3).	CENTRAL SWINDON SOUTH	S/PO2R/23/0164	20	0	20	20	0	None (PD)	0%	0	0	Delegated Report dated 31/05/2023
T192	171 Victoria Road Old Town Swindon SN1 3DF	Change of Use of Ground Floor from Pharmacy/Retail (E Use Class) to 1 no. Flat (C3 Use Class) and associated works.	CENTRAL SWINDON SOUTH	S/22/1535	1	0	1	1	0	None (Below threshold)	0%	0	0	n/a
T193	55 - 61 Regent Street Swindon SN1 1JS	Prior approval notification for the erection of a further storey to provide 14no. apartments	CENTRAL SWINDON SOUTH	S/PAOTH/21/1387	14	0	14	14	0	None (PD)	0%	0	0	Delegated Report dated 14/07/2022
T194	Burcot House Tadpole Lane Blunsdon St Andrew Swindon SN25 2DY	Prior Notification for the demolition of a dwelling and associated outbuilding/s.	BLUNSDON ST ANDREWS	S/DEM/22/0596	-1	0	-1	-1	0	None (Below threshold)	0%	0	0	n/a

T195	14 Lorne Street Swindon SN1 5DP	Prior Approval Notification for theChange of Use of ground floor from Hairdressing Salon (Use Class E) to Dwelling House (Use Class C3).	CENTRAL SWINDON SOUTH	S/PO2R/22/0235	1	0	1	1	0	None (Below threshold)	0%	0	0	n/a
T196	42-45 Fleet Street Swindon SN1 1RE	Prior Approval Notification for theChange of Use of first and second floors from commercial (Class E) and Leisure Use (Class E(d)) to form 14no residential apartments (Class C3) and associated works.	CENTRAL SWINDON SOUTH	S/PO2R/22/1340	14	0	14	14	0	None (PD)	0%	0	0	Delegated Report dated 17/01/2023
T197	Cattle Stalls And Main Barn, Eastrop Farm Buildings, Highworth	Prior Approval for proposed change of use of existing agricultural buildings to 3no. dwellings (Class C3)	HIGHWORTH	S/PRIORC/17/100 4	3	0	0	0	0	None (Below threshold)	0%	0	0	n/a
T198	Stirling House Viscount Way Swindon	Prior Approval Notification for the change of use from offices (Class B1a) to 26no. residential flats (Class C3).	SOUTH MARSTON	S/PO2R/21/0497	26	0	0	0	0	None (PD)	0%	0	0	Delegated Report dated 23/04/2021
Totals						0	317	469	0			0	0	

Turley Ref.	Site Address	Development proposal	Parish	Outline Ref	RM / FULL	Units (Net)	Dwellings completed 2024/25	Net to be taken into trajectory	Expected Net Supply		AH Contribution Type	On Site AH %age	Projected Gross AH Supply		Source
									2025/26 - 2029/30	2030/31 onwards			2025/26 - 2029/30	2030/31 onwards	
T199	Land At Langton Park, Wroughton, Swindon	Outline application for the erection of 8no. dwellings, all matters reserved except for means of access.	WROUGHTON	S/OUT/23/0240 (sitting alongside S/OUT/21/1345)		8	0	8	0	8	None (Below threshold)	0%	0	0	n/a
T200	Kimmerfields development (see footnote 1)	Outline application seeking redevelopment to provide mixed-use development to include office, residential, shops, restaurants & cafes, drinking establishments, hot food takeaways, healthcare facilities (including a PCT Healthcare facility), hotel, leisure, car parking (including multi-storey car park), bus interchange, public realm and associated highways works - Access not reserved.	CENTRAL SWINDON SOUTH	S/11/0614		450	0	450	30	420	On site	25%	8	105	S.106 dated 03/05/2012
T201	Land At Saint Michaels Thornhill Road South Marston Swindon	Outline application for residential development comprising of 6no. dwellings, associated access, car parking and landscaping. (Means of access not reserved).	SOUTH MARSTON	S/OUT/19/0695		6	0	6	0	6	None (Below threshold)	0%	0	0	n/a
T202	Land East Of Woodbine Cottage Kingsdown Lane Blunsdon Swindon	Outline application for the erection of 8 no. self-build dwellings. All matters reserved except for access.	BLUNSDON	S/OUT/20/0549		8	0	8	0	8	None (Below threshold)	0%	0	0	n/a
T203	Land West Of Woodbine Cottage Kingsdown Lane Blunsdon Swindon SN25 5DL	Outline application for the erection of 2no. dwellings. All matters reserved except for access.	BLUNSDON	S/OUT/20/0548		2	0	2	0	2	None (Below threshold)	0%	0	0	n/a
T204	Land To The West Of Former Electricity Sub Station, Langton Park, Wroughton, Swindon (see footnote 2)	Outline application for the erection of 30no. dwellings with associated access and parking - means of access and layout not reserved.	WROUGHTON	S/OUT/21/1634	RM pending	30	0	30	30	0	On site	30%	9	0	S.106 dated 01/12/2022
T205	Fennels Farm, Shrivenham Road, Highworth, Swindon	Application for Permission in Principle for the demolition of existing non-residential buildings and erection of 2-6 no. two-storey residential units.	HIG	S/PIP/24/0911		6	0	6	0	6	None (Below threshold)	0%	0	0	n/a
T206	WH Smith Headquarters, WH Smith Site, Greenbridge Road Stratton St Margaret Swindon SN3 3JE	Outline planning application with details of access (matters of layout, scale, landscaping and appearance are reserved), comprising the demolition of existing distribution warehouse and offices, the erection of up to 228 residential dwellings (Use Class C3) and associated works.	STRATTON ST MARGARET	S/OUT/20/1390		228	0	0	0	0	On site	10%	0	0	S.106 dated 01/10/2023
T207	Land At Shrivenham Road, Highworth, Swindon (see footnote 3)	Outline planning application for up to 250 dwellings (including 30% affordable housing) with public open space, landscaping and sustainable drainage system (SuDS) and vehicular access point from Shrivenham Road. All matters reserved except for means of access.	HIGHWORTH	S/OUT/20/0422		12	0	0	0	0	On site	30%	0	0	S.106 dated 30/06/2025
T208	32 - 34 Bridge Street, Swindon (see footnote 4)	Application for Outline planning permission related to matters of layout, scale and appearance for the demolition of the existing building and erection of a 5 storey, mixed use building containing ground floor commercial use (E Class Use) and 19 self-contained residential units from 1st to 4th floor.	CENTRAL SWINDON SOUTH	S/OUT/23/0289		19	0	0	0	0	None (Viability)	0%	0	0	Delegated Report dated 29/04/2024
T209	32 - 34 Bridge Street Swindon (see footnote 4)	Application for Outline planning permission related to matters of layout, scale and appearance for the division of the ground floor space to provide 2no separate commercial units (E Class Use) and demolition of existing and re-build of first floor to provide 5no self-contained residential units.	CENTRAL SWINDON SOUTH	S/OUT/23/0285		5	0	0	0	0	None (Below threshold)	0%	0	0	n/a
T210	Land At Catsbrain Farm, Highworth Road, Swindon (see footnote 5)	Outline planning application (with the means of access off Kingsdown Road not reserved) for the development of up to 190 residential dwellings (Use Class C3) and a convenience store (Use Class A1) and associated open space, growing spaces, landscaping, highways improvements, road and drainage infrastructure. All other matters reserved	STRATTON ST MARGARET	S/OUT/19/0215		3	0	0	0	0	None (Below threshold)	0%	0	0	n/a
T211	Land Off Kingsdown Road, Kingsdown Road, Kingsdown, Swindon (see footnote 6)	Outline application for the erection of Class C2 Care Village, comprising 40no. bedroom dementia home, 120no. close care apartments, communal club house to include; shop, library, hydrotherapy pool, gym, quiet room, residents lounge, dining room and hairdressing salon, together with associated access, landscaping and car parking - Access not reserved.	STRATTON ST. MARGARET	S/OUT/14/1879		44	0	0	0	0	None (Care)	0%	0	0	Planning Statement dated October 2014
Totals						821	0	510	60	450			17	105	

Turley Ref.	Site Address	Development proposal	Parish	Outline Ref	RM / FULL	Units (Net)	Dwellings completed 2024/25	Net to be taken into trajectory	Expected Net Supply		AH Contribution Type	On Site AH %age	Projected Gross AH Supply		Source
									2025/26 - 2029/30	2030/31 onwards			2025/26 - 2029/30	2030/31 onwards	
T212	Wichelstowe Phase 2 - Parcel 8B West Boulevard Middle Wichel District Centre (see footnote 1)	Erection of a care home with 83no. bedrooms, associated communal accommodation, parking and landscaped gardens - Reserved Matters from previous permission S/13/1524.	WROUGHTON	S/13/1524	S/RES/21/0188	56	30	26	26	0	None (Care)	0%	0	0	Delegated Report dated 10/07/2021
T213	Wichelstowe Phase 1 - Parcel 4 The Orchards (see footnote 1)	Erection of 188 no. dwellings and associated works - Reserved Matters from previous permission S/13/1524.	WROUGHTON	S/13/1524	S/RES/21/0007	190	90	46	46	0	On site	15%	7	0	Officers Report dated 24/09/2021
T214	Wichelstowe Phase 1 - Parcel 6 The Orchards (see footnote 1)	Erection of 106no. dwellings and associated works - Reserved Matters from previous permission S/13/1524.	WROUGHTON	S/13/1524	S/RES/21/0008	106	60	27	27	0	On site	16%	4	0	Officers Report dated 09/07/2021
T215	Wichelstowe Parcel 7DC and 9DC Middle Wichel District Centre (see footnote 1)	Reserved Matters Application pursuant to S/13/1524 for the erection of retirement living apartments (C3) and assisted living apartments (C2) with associated communal facilities, car parking and landscaping.	WROUGHTON	S/13/1524	S/RES/22/1632	85	0	85	85	0	On site	15%	13	0	Officers Report dated 21/03/2019
T216	Land Adjacent To Eden Field, Kingsdown Lane, Blunsdon, Swindon	Erection of 4 no. dwellings.	BLUNSDON		S/23/0920	4	0	4	4	0	None (Below threshold)	0%	0	0	n/a
T217	Badbury Park Phase 3	Erection of 126 no. residential units with associated landscaping and infrastructure works - Reserved Matters application following Outline Planning Permission S/OUT/20/0233.	CENTRAL SWINDON SOUTH	S/20/0233	S/RES/21/0868	126	56	21	21	0	On site	30%	6	0	Officers Report dated 23/12/2021
T218	Redlands Phase 1a (Vistry) (Bovis Homes and Linden Homes) (see footnote 2)	Erection of 100no. dwellings and associated works - Reserved Matters from previous outline permission S/OUT/16/0021. Redlands (Phase 2)	WANBOROUGH	S/OUT/16/0021	S/RES/21/0764	97	0	97	97	0	On site	20%	19	0	Officers Report dated 05/05/2023
T219	Redlands Phase 1b and 1c (Bellway) / Redlands Grove (see footnote 2)	Erection of 81no. dwellings and associated works - Reserved Matters from previous outline permission S/OUT/16/0021. Redlands (Phase 1)	WANBOROUGH	S/OUT/16/0021	S/RES/21/0454	81	70	9	9	0	On site	20%	2	0	Delegated Report dated 11/02/2022
T220	Redlands Phase 2b (Vistry) (see footnote 2)	Erection of 100no. dwellings and associated works - Reserved Matters from previous outline permission S/OUT/16/0021. Redlands (Phase 2)	WANBOROUGH	S/OUT/16/0021	S/RES/21/0867	103	0	103	103	0	On site	20%	21	0	Delegated Report dated 7/07/2023
T221	Redlands Phase 2c (Bellway) (see footnote 2)	Reserved Matters application for the layout, scale, appearance and landscaping of 3no. Dwellings in pursuant of S/OUT/16/0021	WANBOROUGH	S/OUT/16/0021	S/RES/22/1795	3	0	3	3	0	None (Below threshold)	0%	0	0	n/a
T222	Wichelstowe Phase 3 - Parcel 12 (see footnote 1)	Wichelstowe Residential Parcel 12 Details of the layout, scale, appearance, landscaping and access in relation to residential Parcel 12 within Wichel Fields, Wichelstowe in accordance with Condition 4 of the outline planning consent (S/13/1524/SAC).	WROUGHTON	S/13/1524	S/RES/23/1530	76	0	76	76	0	On site	13%	10	0	Delegated Report dated 16/09/2024
T223	Wichelstowe Phase 2 - Parcel 10 (see footnote 1)	Reserved Matters for 113no. dwellings details of the layout, scale, appearance, landscaping and access in relation to outline planning permission S/13/1524.	WROUGHTON	S/13/1524	S/RES/22/1152	113	0	113	113	0	On site	11%	12	0	Delegated Report dated 24/05/2023
T224	Wichelstowe Phase 2 - Parcel 8 Middle Wichel (see footnote 1)	Erection of 138no. dwellings and associated works - Reserved Matters from previous outline permission S/13/1524.	WROUGHTON	S/13/1524	S/RES/22/1052	138	0	138	138	0	On site	13%	18	0	Delegated Report dated 14/03/2023
T225	Wichelstowe Phase 2 - Land East Of Scott Way (Parcel 7) (see footnote 1)	Erection of 184no. dwellings and associated works - Reserved Matters from previous permission S/13/1524.	WROUGHTON	S/13/1524	S/RES/22/0900	184	0	184	184	0	On site	11%	20	0	Delegated Report dated 20/12/2022
T226	Wichelstowe Phase 2 - Land West Of Scott Way (Parcel 9) (see footnote 1)	Erection of 181no. dwellings and associated works - Reserved Matters from previous permission S/13/1524.	WROUGHTON	S/13/1524	S/RES/22/0837	181	0	181	181	0	On site	15%	27	0	Delegated Report dated 2/12/2022
T227	Wichelstowe Phase 3 - Parcel 11 (see footnote 1)	Reserved Matters application for details of the layout, scale, appearance, landscaping and access in relation to residential Parcel 11 within the Orchards, Wichelstowe in accordance with Condition 4 of the outline planning consent (S/13/1524/SAC).	WROUGHTON	S/13/1524	S/RES/23/1573	328	0	328	240	88	On site	15%	36	13	Delegated Report dated 13/12/2024
T228	Wichelstowe Phase 3 - Parcel 13 (see footnote 1)	Details of the layout, scale, appearance, landscaping and access in relation to residential Parcel 13 for 207no residential units in accordance with Condition 4 of the outline planning consent (S/13/1524/SAC).	WROUGHTON	S/13/1524	S/RES/24/0058	207	0	207	60	147	On site	15%	9	22	Delegated Report dated 23/12/2024
T229	Wichelstowe Phase 3 - Canalside East (see footnote 1)	Details of the layout, scale, appearance, landscaping and access in relation to mixed-use development for 14no residential units, a gym and cafe	WROUGHTON	S/13/1524	S/RES/24/0120	14	0	14	14	0	None (Below threshold)		0	0	Delegated Report dated 29/11/2024
T230	Wichelstowe Phase 3 - Canalside West (see footnote 1)	Details of the layout, scale, appearance, landscaping and access in relation to mixed-use development at Canalside West within Wichelstowe District Centre,	WROUGHTON	S/13/1525	S/RES/24/0122	12	0	12	12	0	None (Below threshold)		0	0	Delegated Report dated 16/12/2024
T231	South Marston Phase 8 (Taylor Wimpey) (see footnote 3)	Erection of 134 dwellings and provision of public open space with associated infrastructure and earthworks (layout, scale, appearance and landscaping) - Reserved Matters from previous outline permission S/OUT/13/1555.	SOUTH MARSTON	S/OUT/13/1555	S/RES/24/0923	81	0	81	81	0	On site	23%	19	0	Delegated Report dated 29/01/2025

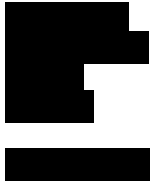
T232	South Marston Phase 9 (Taylor Wimpey) (see footnote 3)	Erection of 134 dwellings and provision of public open space with associated infrastructure and earthworks (layout, scale, appearance and landscaping) - Reserved Matters from previous outline permission S/OUT/13/1555.	SOUTH MARSTON	S/OUT/13/1556	S/RES/24/0923	53	0	53	53	0	On site	23%	12	0	Delegated Report dated 29/01/2025
T233	Redlands Phase 1d - Village Square (Vistry and Bellway) (see footnote 2)	Reserved Matters Application (following outline planning permission S/OUT/16/0021) for the Village Square, Convenience Retail Unit, 8 Apartments, Associated Servicing, Parking and Landscaping.	WANBOROUGH	S/OUT/16/0021	S/RES/23/0128	8	0	8	8	0	None (Below threshold)	0%	0	0	n/a
T234	Lotmead and Lower Lotmead Phase 1 - 214 units (see footnote 4)	Reserved matters application (following outline planning permission S/OUT/19/0582) for the layout, scale, appearance, access (other than access from Wanborough Road, as already approved by the outline permission) and landscaping for 214 No. dwellings (Phase 1)	WANBOROUGH	S/OUT/19/0582	S/RES/22/1736	214	0	214	214	0	On site	20%	43	0	Delegated Report dated 19/07/2024
T235	3 And 4 Southleaze Cottages, Wichelstowe, Swindon	Prior Approval application for the demolition of 3 and 4 Southleaze Cottages.	WROUGHTON		S/DEM/24/0967	-2	0	-2	-2	0	None (Below threshold)	0%	0	0	n/a
T236	Great Stall East (Capital Land) (see footnote 5)	Outline planning application (with means of access to the A420 not reserved) for up to 1,550 homes; education provision including a 10 form entry secondary school and a 3 form entry primary school with attendant sports pitches; a sports hub and open space; a park and ride; a local centre up to 1,000sqm including classes A1, A2, A3, A4, A5 and D1 uses; public open space/green infrastructure; new informal and formal recreation spaces; and the formation of a new permanent access from the A420	SOUTH MARSTON	S/OUT/17/1990		1550	0	1531	325	1206	On site	15%	49	181	S106 dated 18/08/2021
T237	Lotmead and Lower Lotmead (Countryside) Outline Remainder (see footnote 4)	Outline Planning Application (means of access off Wanborough Road not reserved) for demolition and/or conversion of existing buildings and redevelopment to provide up to 2,500 homes (Use Class C3); up to 1,780 sqm of community/retail uses (Use Class D1/D2/A1/A3/A4); up to 2,500 sqm of employment use (Use Class B1); sports hub; playing pitches; 2no. 2 Form Entry primary schools; green infrastructure; indicative primary access road corridors to A420; improvements to Wanborough Road and associated works.	WANBOROUGH	S/OUT/19/0582		1684	0	1684	573	1111	On site (Including grant funding)	28%	160	311	S106 dated 21/07/2023
T238	Foxbridge North (Land At Foxbridge Village North) (Danescroft) (see footnote 6)	Outline application for the erection of up to 220 no. dwellings, commercial facilities up to 300 sq.m. (Use Classes A1/ A2/A3/A4/A5/ B1 & D1) and 2.2 ha land for a primary school with associated parking, landscaping, drainage and heritage trail; access to Southern Connector Road not reserved	WANBOROUGH	S/OUT/20/0533		220	0	220	73	147	On site	15%	11	22	S106 dated 1/10/2022
T239	Foxbridge South (Land At Foxbridge Village) (Barratt and David Wilson Homes) (see footnote 7)	Outline application for mixed use development comprising up to 358 dwellings and a mixed use hub of up to 1,550sqm (use classes A1/A2/A3/A4/A5 and D1) with associated works. Details of the access from the Southern Connector Road to be determined with all other matters reserved (Revised details)	WANBOROUGH	S/OUT/20/0160		320	0	320	140	180	On site	15%	21	27	S106 dated 16/12/2024
T240	South Marston Extension & Rowborough Outline Remainder (see footnote 3)	Outline Planning Permission, for a sustainable urban extension to the east of Swindon and north of the A420 of up to 2,380 dwellings together with a mixed use local centres/areas (including A1 retail up to 1,500 sq metres, services (A2), restaurants, pubs and takeaways (A3, A4, A5), business uses (B1) up to 1,000 sq metres, residential); community uses (D1); sheltered and/or care accommodation (C2/C3); two primary schools; green infrastructure including formal (including playing fields) and informal open space, landscape, biodiversity and amenity space; play space (including NEAPS/LEAPS/MUGAS); changing and sports facilities (including D2) and ancillary retail uses; sustainable drainage systems; highway, cycle and pedestrian routes; car parking; infrastructure (including utilities); engineering works including ground remodelling; demolition, site reclamation and removal of structures; the formation of new accesses from the A420, Old Vicarage Lane and Thornhill Road.	SOUTH MARSTON	S/OUT/13/1555		2282	0	2282	898	1384	On site	23%	207	318	S106 dated 11/08/2021
T241	Kingsdown (Land To East Of A419), Swindon - Outline pending (see footnote 8)	Outline planning application for a mixed use development comprising up to 1,552 dwellings, a local centre (Use Classes A1-5, D1, C2 and C3), a primary school (Use Class D1), public open space, landscaping, new vehicular accesses including a bridge across the A419 and associated works. (Means of access not reserved).	BLUNSDON	S/OUT/17/1821		1552	0	1552	470	1552	On site	13%	61	202	Housing Comments dated 22/12/2022

T242	Land North Of Turnpike Road, Blunsdon, Swindon - Outline pending	Outline application for the erection of up to 125no. dwellings and associated works - Access not reserved.	BLUNSDON	S/OUT/20/0769		125	0	125	0	125	On site	30%	0	38	Planning Statement dated 26/06/2020
T243	Land East of Wanborough Road (Hannick Homes) - Outline pending	Outline planning permission for up to 275 dwellings (use class C3) including the provision of affordable homes, together with pedestrian and cycle connections, landscaping, surface water drainage, open space to include play areas, allotments and other supporting infrastructure (including utilities) and engineering works including groundworks; removal of structures and demolition; with all matters reserved except for the formation of accesses from the Southern Connector Road and Wanborough Road.	WANBOROUGH	S/OUT/23/0456		275	0	275	0	275	On site (Viability)	15%	0	41	Financial Appraisal dated 28/02/2024
T244	Redlands Phase 3a (Hayfield Homes) - Land North Of Redlands Farm Wanborough Road - Outline pending	A Hybrid Planning Application for a residential development, associated works, infrastructure, parking, new / retained habitats, and ancillary development to include - full details for the erection of 120 dwellings (Class C3), public open space, a LEAP, landscaping, sustainable drainage, roads, vehicular access and pedestrian / cycle paths and an outline proposal (Means of Access not reserved) for the erection of up to 128 dwellings (Class C3), public open space, landscaping, bridge crossings, safeguarded canal corridor, sustainable drainage, roads, vehicular access and pedestrian / cycle paths.	WANBOROUGH	S/OUT/22/1415		248	0	248	0	248	On site	30%	0	74	Housing Comments dated 01/08/2025
T245	Redlands Phase 3b (Redlands Phase 2 Redlands Farm Wanborough Road (Barberry) - Outline pending	Outline application for the erection of up to 80 dwellings and open space with all matters reserved.	WANBOROUGH	S/OUT/23/1514		80	0	80	0	80	On site	30%	0	24	Planning Statement dated 4/12/2023
T246	Great Stall West	Land remaining within NEV allocation	WANBOROUGH			700	0	700	0	700	On site (Assumed)	30%	0	210	Swindon Borough Local Plan Policy HA2
T247	Upper Lotmead	Land remaining within NEV allocation	WANBOROUGH			850	0	850	0	850	On site (Assumed)	30%	0	255	Swindon Borough Local Plan Policy HA2
T248	Wichelstowe Outline Remainder (see footnote 1)	Southern Town Expansion including up to 4500 dwellings, employment, commercial, shopping, schools, open space, park and ride, roads, sewers and associated works (Variation of extent of infrastructure, phasing and affordable housing, upon S/TIME/13/1521 by the Local Planning Authority, conditions 1, 62, 66 & 67, 73, 76 - 79, 82, 85, 88 - 90, 93 and 95 - 97).	WROUGHTON	S/13/1524		2,181	0	2,181	0	2,181	On site	15%	0	327	S106 dated 18/08/2019
Totals						14,525	306	14,076	4,272	10,274			787	2,066	

Appendix 2: New Site Allocations Breakdown (Turley analysis)

Site allocation ref	Site name	Plan area	Suggested use(s)	Gross site area (ha)	Indicative constrained residential yield	Yr 1 2023/24	Yr 2 2024/25	Yr 3 2025/26	Yr 4 2026/27	Yr 5 2027/28	Yr 6 2028/29	Yr 7 2029/30	Yr 8 2030/31	Yr 9 2031/32	Yr 10 2032/33	Yr 11 2033/34	Yr 12 2034/35	Yr 13 2035/36	Yr 14 2036/37	Yr 15 2037/38	Yr 16 2038/39	Yr 17 2039/40	Yr 18 2040/41	Yr 19 2041/42	Yr 20 2042/43	Plan Period Total
18-001	North Star	Central	Residential + swimming pool + transitional employment land	12.88 ha	743						100	150	150	150	150	43										743
18-002	Land to the north of the Station	Central	Residential + transitional employment land	9.3 ha	1,358						50	100	100	100	71		37	100	100	100	100	100	100	100	100	1,258
18-003	Swindon Station Quarter	Central	Station + residential + offices	4.2 ha	438									100	100	100	100	38								438
18-004	Bristol Street Car Park	Central	Residential	0.9 ha	102											50	52									102
18-005	Farringdon Road Corner	Not stated	Residential	0.07 ha	8									8												8
18-006	Brunel Quarter	Central	Residential + town centre uses at GF	6.08 ha	1,016											100	100	100	100	100	79	37	100	100	100	916
18-007	The Parade (excluding old Debenhams building)	Central	Residential + town centre uses retained at GF	1.47 ha	245															100	100	45				245
18-008	Regent Place and Princes Street Car Park	Central	Residential + retained Wyvern	1.46 ha	262									100	100	62										262
18-009	Spring Gardens Car Park	Central	Residential	0.25 ha	60								30	30												60
18-010	Civic Campus	Central	Residential	1.33 ha	115												50	50	15							115
18-011	Land to the west of South Marston	Northeast	Residential	7.53 ha	128					30	55	43														128
18-012	Land at Meadow Cottage	Northeast	Residential	0.61 ha	16									16												16
18-015	Stubbs Hill Farm	Northeast	Residential	1.93 ha	29												29									29
18-016	Land North of Kingsdown Lane	Northeast	Residential	3.42 ha	77										30	47										77
18-017	Kingsdown Lane Nursery	Northeast	Residential	2.86 ha	64												30	34								64
18-019	North Tadpole	North	Residential	42.15 ha	513										10	100	100	101	50	50	50	52				513
18-020	Land east of Swindon Road	South	Residential	9.11 ha	191																50	100	41			191
18-021	Berkley Farm	South	Residential	16.24 ha	355														100	100	100	55				355
18-022	Akers Land	South	Residential	13.37 ha	300											100	100	100								300
18-023	Land off Swindon Road	South	Residential	11.69 ha	175					50	50	50	25													175
18-024	Marlowe Avenue Urban Regenerati on Area	Central East	Residential led mixed-use	52.06 ha	976									100	100	100	100	100	100	100	100	76				976
18-025	Intel Campus	Central South	Residential	4.89 ha	276												50	50	50	50	76					276
18-026	Wakefield House	Central South	Residential	4.04 ha	228								50	50	50	50	28									228
18-027	Former Wroughton Park and Ride	Central South	Residential	3.23 ha	340								100	100	100	40										340
18-028	Land at Pentylands Lane / Crane Furlong	Northeast	Residential	2.34 ha	53						53															53
18-029	Land at Sams Lane	Northeast	Residential	5.12 ha	115							50	50	15												115
18-030	Land south of Highworth Road	Northeast	Residential	5.92 ha	89									40	49											89
18-031	Land at Turnpike Road	Northeast	Residential	4.13 ha	93									50	43											93
18-032	Land at 12 Turnpike Road	Northeast	Residential	2.14 ha	48										48											48
18-033	Land west of Shaw Village Centre	West	Residential	0.2 ha	6									6												6
18-034	Newburn Sidings	Central South	Residential	5.42 ha	203					50	50	50	53													203
18-035	Vacant Bus Depot	Central South	Residential	0.59 ha	40						40															40
18-036	Site of former Whitbourne House care home	Central East	Residential	0.56 ha	37						37															37
Totals Stated in Document 03.08					8,700	0	0	0	0	130	435	443	558	865	851	698	776	673	515	600	605	479	431	241	200	8,500
Actual Totals					8,699	0	0	0	0	130	435	443	558	865	851	692	776	673	515	600	605	484	431	241	200	8,499
Actual Totals minus sites that do not qualify for affordable housing contributions					8,685	0	0	0	0	130	435	443	558	851	851	692	776	673	515	600	605	484	431	241	200	8,485
Likely affordable housing delivery (assumed to be policy compliant @ 30%)					2,606	0	0	0	0	39	131	133	167	255	255	208	233	202	155	180	182	145	129	72	60	2,546

Turley



Appendix 2: Proposed Site Layout

HW
09/10/2025



LANDSCAPE KEYNOTES:

- 1 - Existing frontage hedge retained, reinforced & grown-out to 3 metres tall
- 2 - Dense tree planting to site frontage
- 3 - New native hedgerow, densely planted & including standard/feathered trees
- 4 - Entrance flanked by additional native hedges
- 5 - Smaller-scale trees within easement, subject to agreement
- 6 - Existing mature tree belts provide strong visual & physical containment
- 7 - Specimen trees in tree grilles within plaza

KEY :

- Access to open space
- Mixed native hedges
- Soft landscape areas including shrub, groundcover and hedge planting
- Parking spaces and reinforced grass

See also accompanying LANDSCAPE STRATEGY

PROPOSED SITE LAYOUT 1:500 @ A1

MATHEWSON WATERS ARCHITECTS

The Old Surgery
Crowle Road - Lambourn
Berkshire RG17 8NR

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17112-126

PROJECT

Land South of Broad Bush (B4019), Blunsdon, Wiltshire

ALL FIGURED DIMENSIONS ARE TO BE TAKEN AS REFERRED TO SQUARE DIMENSIONS AND ANY RECTANGLES ARE TO BE REFERRED TO THE ARCHITECT. DIMENSIONS TO BE SHOWN ON SITE ENTRY: ANY WORK IS PUT IN HAND ON PREPARATION OF THIS DRAWING IS STAMPED BY THE ARCHITECT AND IT MUST NOT BE REPRODUCED WITHOUT THEIR WRITTEN CONSENT.

REVISION DATE

AMENDMENTS

SCALE BAR 1:500



Respondent No: 318

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Neville

Q3. Last Name Surtees

Q4. Job Title (where relevant) Associate Director

Q5. Organisation (where relevant) Savills obo Wain Homes (Severn Valley) Limited

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q12. Please set out your comments below. Please be as precise as possible.

SBC admin note: Please see attached response

Q13. Please set out the changes you consider are needed. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

not answered

Swindon Local Plan 2023-2043 Regulation 18

Response on behalf of Wain Homes Severn Valley Limited

October 2025

PREPARED FOR



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1. Introduction

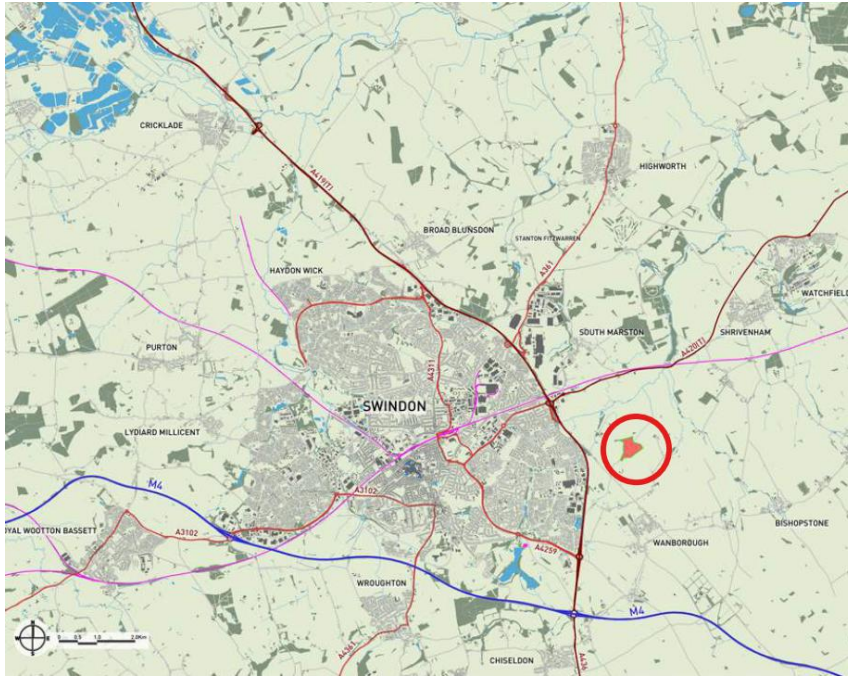
- 1.1 Savills is instructed by Wain Homes Severn Valley Limited ('Wain Homes') to make representations to the Swindon Local Plan 2023-2043 (Regulation 18) consultation, published in September 2025.
- 1.2 Wain Homes has an existing interest in land within the administrative area of Swindon Borough Council (SBC) comprising Land North of Redlands Farm (see Site Boundary Plan below).



Site Boundary Plan

- 1.3 Wain Homes land interest is located on the eastern side of Swindon and is situated within the area covered by the New Eastern Villages ('NEV') strategic allocation site. The NEV allocation is confirmed in Policy NC3 and identified on the associated Inset Diagram of the current adopted Swindon Local Plan 2026 (Adopted March 2015) (see extract of the plan below).
- 1.4 The general location of Wain Homes site in relation to Swindon is provided on the Site Location Plan presented below.
- 1.5 As shown on the Illustrative Masterplan for the NEV produced by SBC in 2021 (which formed part of the withdrawn Local Plan, July 2021), the Wain Homes site is located between and forms part of two of the new 'villages' to be delivered as part of the NEV strategic allocation (i.e. Lotmead Village in the north and Redlands Village in the south of the Wain Homes site). The delivery of development at this site is pivotal in providing an essential point of connection between these two villages, including the provision road and footpath / cycleway links. The location of Wain Homes site in relation to these two villages is presented below.
- 1.6 A hybrid planning application for the Wain Homes sites was submitted by Savills and validated by SBC on 21st September 2021 (Ref. S/OUT/22/1415). Since that time, work has been progressed by Wain Homes in response to the consultation responses received in relation to the application.

- 1.7 Wain Homes is working with SBC officers to conclude any further consultee comments and agree a scope of additional information to be presented to address these. A further submission of information will be submitted in Autumn / Late 2025 to address outstanding matters in order for the application to be determined in either late 2025 or early 2026.



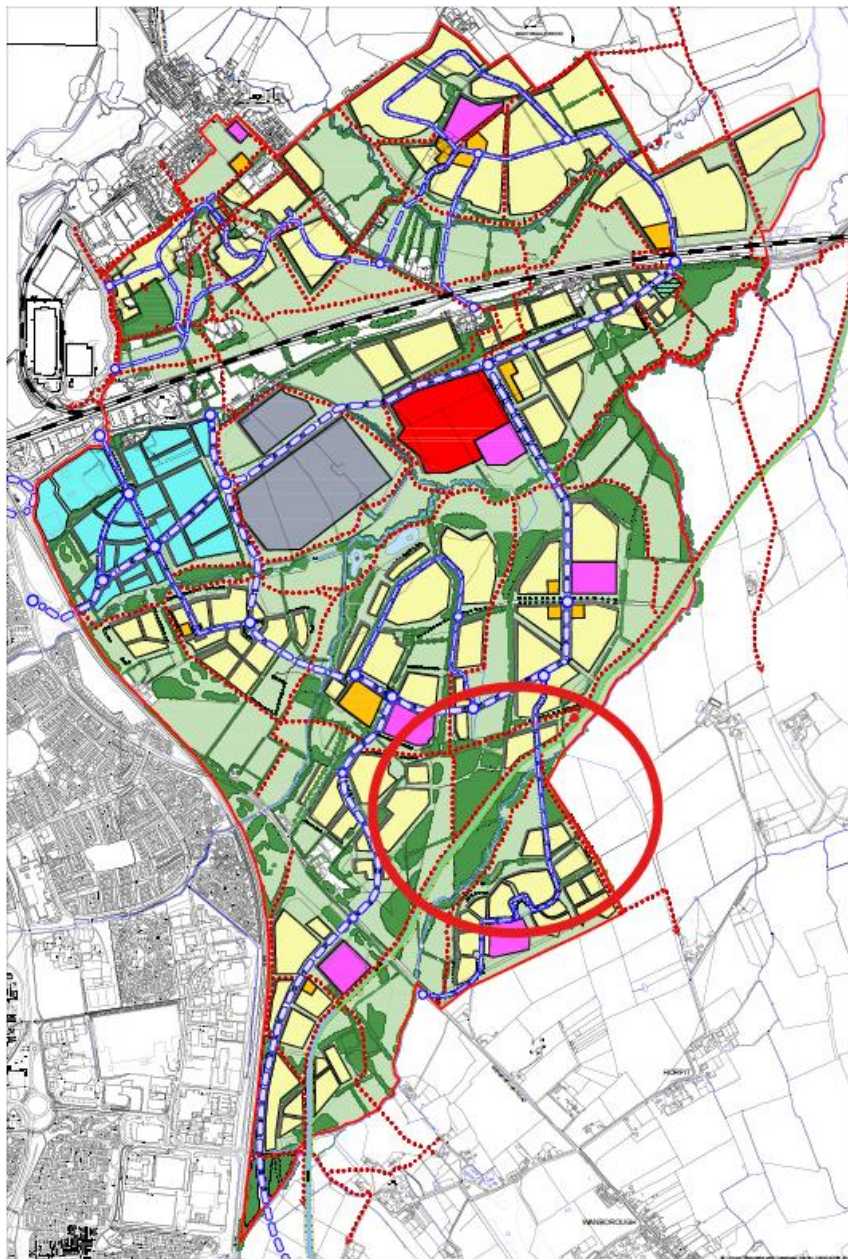
Site Location Plan

- 1.8 The Wain Homes site extends to approximately 17.05 hectares (of which the detailed planning area is 9.82 hectares and the outline planning area is 7.23 hectares). Other land within Wain Homes control extends to 2.68 hectares (i.e. land immediately to the east of the site).
- 1.9 The proposed development includes the following key components:
- New homes: 248 new homes (124 homes within the detailed first phase of development; and 124 homes within the second outline phase).
 - Vehicular and pedestrian connections to that part of Redlands Village which is currently being constructed by Bellway and Vistry and to Lotmead Village to the north.
 - Landscaping and areas for biodiversity net gain.
 - Public open space provision, incorporating a Neighbourhood Equipped Area of Play (NEAP).
 - Eastern landscape buffer to prevent any coalescence occurring between the site and the surrounding settlements.
 - A safeguarded 50m wide corridor to allow for the future delivery of the Wilts and Berks Canal through the site.
 - Crossing of the canal to provide access between Redlands and Lotmead Villages.
- 1.10 These proposals are identified on Wain Homes Illustrative Masterplan (Ref: P24-1791_DE_01_G_01) (see **Appendix 1**).
- 1.11 The proposed timing of the start of construction will coincide with the determination of the hybrid application, which is envisaged in early 2026. The discharge of conditions is envisaged to take place immediately after the issue of the Decision Notice, between spring and summer 2026. From this

start point, a period of 6 months of site and plot preparation will follow. Housebuilding completions will follow from Late 2026 / Early 2027. In total, Wain Homes estimate that the construction of up to 248 dwellings will take 6-7 years.

- 1.12 Based on a planning consent being issued in Spring 2026, the following table shows the indicative construction programme:

Indicative Construction Programme							
Year	1	2	3	4	5	6	7
	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32
Completions		40	50	50	50	50	8
Cumulative		40	90	140	190	240	248



Location Plan – New Eastern Villages (SBC Masterplan 2021)

- 1.13 The proposed development of Land North of Redlands Farm will make an important contribution towards SBC addressing its current housing land supply shortfall which the Council estimates to be

4.90 years. The full delivery of new homes at the Wain Homes site will also contribute towards SBC's objective to focus development at its Strategic Growth Locations.

- 1.14 The responses provided here by Wain Homes are intended to help SBC develop its new Local Plan into a draft that will deliver sustainable development and can be considered sound. Given the inclusion of Wain Homes site within the overall boundary of the NEV Strategic Growth location, Wain Homes would welcome further engagement with the Council regarding emerging Policy prior to the next consultation.

2. Spatial Strategy and Strategic Area Policies

Policy SS1: Swindon's Spatial Approach to Growth

Comments:

- 2.1 Wain Homes supports in principle the aim of Policy SS1 for the Swindon Urban Area to be the main focus for housing, commercial and industrial growth in the Borough.
- 2.2 Wain Homes also supports the identification of Strategic Growth Locations, such as the NEV, as a primary location for future growth in the town of Swindon (Policy SS1 Part 1(c)).
- 2.3 However, Wain Homes has significant concerns about the primacy given in Policy SS1 to the Strategic Growth Location at Swindon town centre and the wider Central Area, as a location which will deliver significant levels of growth.
- 2.4 As stated in more detail in relation to Policy SGL01, Wain Homes doubts that the quantum of development identified by SBC will be delivered in the town centre and wider Central Area. This is because of the questionable viability of sites proposed by SBC in these locations, as evidenced in the council's own Viability Assessment and by the lack of progress in completing the Kimmerfields development, which was originally granted planning permission in 2012 (Ref. S/11/0614/HMC).

Changes:

- 2.5 Further consideration of this Policy is required, in particular in relation to the emphasis placed on the ability of the town centre and Central Area to deliver growth at the levels proposed in the new Local Plan during the Plan period.
- 2.6 The list of future growth locations in Part 1(a) of Policy SS1 should be reordered to acknowledge the ability of the locations identified to deliver growth in the short, medium and long terms. The reordering of growth locations should also reflect the varying scales of development which can be delivered and accommodated in the stated locations. This reordering should include moving Strategic Growth Locations, such as the NEV, higher up the list in this Policy, to be at least above Urban District Centres. This is because locations such as the NEV will deliver significantly higher levels of growth than could happen in the district centres.

Policy SS2: Settlement Hierarchy (incl. Table 1)

Comments:

- 2.7 Wain Homes objects to the identification of Redlands (NEV) as a 'Larger Village', which sits in the third tier of the settlement hierarchy.
- 2.8 Table 1 of the draft Local Plan defines Larger Villages as being "*smaller settlements that typically have a limited range of services, facilities and employment opportunities. They often serve a local catchment area and have lower levels for accessibility*".
- 2.9 Redlands (and also Foxbridge (NEV)) forms part of the NEV which is a Strategic Growth Location, an adopted Local Plan allocation and is proposed in the draft Local Plan for 10,000 homes and mixed use development (including employment).
- 2.10 Redlands is not a small settlement and cannot be viewed in isolation. Redlands is an integral part of a much wider development area and will have access to a wide range of facilities and services to be provided in the NEV (such as schools, employment opportunities, shops and open space) and have transport links to the town centre and other locations within the town.

- 2.11 By virtue of it forming part of the NEV, Redlands also shares a wide (not local) catchment area with the adjoining development areas within the NEV. In addition, due to its proximity to adjoining areas within Swindon (such as Covingham, Dorcan and Stratton), Redlands and the NEV also benefits from access to existing facilities and services in those areas.
- 2.12 Furthermore, once completed the whole of the NEV will form part of the Swindon Urban Area. In line with the definition of Urban Area in Table 1, the NEV will be a distinct residential neighbourhood of Swindon which will include district and local centres, and a wide range of services and facilities.

Changes:

- 2.13 Policy SS2 should be reworded to reflect Wain Homes comments in relation to Policy SS1, including moving Strategic Growth Locations up in the hierarchy.
- 2.14 Table 1 of the draft Local Plan should be changed to include Strategic Growth Locations within the first tier of the settlement hierarchy, namely the Swindon Urban Area. As part of this change, reference should be made to all of the named areas (including Redlands and Foxbridge) forming part of the NEV Strategic Growth Location.

Policy SGL 01 - Swindon's Central Area

Comments:

- 2.15 Wain Homes acknowledges the importance placed by SBC on rejuvenating the town centre and Central Area, through the redevelopment of brownfield sites. Wain Homes notes that this is a key objective of the draft Local Plan and its Spatial Approach to Growth (Policy SS1), and as evidenced by the number and scale of proposed housing allocation sites listed in Appendix 1 of the draft Local Plan.
- 2.16 The principle of town centre regeneration is supported. Wain Homes also notes that this is a long standing objective of SBC which the Council has sought to deliver over a long period with organisations such as Forward Swindon and the New Swindon Company.
- 2.17 Indeed, Wain Homes notes that both Local and National planning policies are generally supportive of urban renewal, particularly in sustainable, central locations on brownfield sites within settlement boundaries.
- 2.18 However, the scale of new housing development in the town centre and the Central Area has been limited due to the issue of financial viability. This means that with the exception of conversion of vacant office blocks to housing using permitted development rights, the scale of new housing delivered in the town centre has been much less than that proposed in the new Local Plan.
- 2.19 Wain Homes notes that in SBC's evidence base, a Viability Assessment has been prepared (HDH Planning and Development, August 2025). The Viability Assessment makes a number of references to how new housing on brownfield sites in the Central Area is not financially viable. These references include:
- Table 10.2a (Page 138) / Table 12.6a (Page 180): All sites assessed in the Central Area are unviable with negative residual values.
 - Paragraph 10.9 (Page 142): "... in simple terms the greenfield sites derive a Residual Value that is more than the BLV [Benchmark Land Value] suggesting greenfield sites being viable, and brownfield sites derive a Residual Value that less than the BLV suggesting that brownfield sites are not viable on the basis tested ..."
 - Paragraph 10.19 (Page 144): "The higher density flatted development, modelled as 6 storeys and more, in the central area is unlikely to be viable, even without affordable housing".
 - Table 10.10a (Page 151): Sites in the Central Area will be unviable even if 0% affordable housing is accepted by SBC. This compares with housing greenfield sites, such as at the

NEV, generating a viable development with up to 30% affordable housing provision (see Tables 10.10b to 10.10e, and 12.6b to 12.6e).

- Paragraph 12.71 (Page 183): *“Brownfield sites perform less well [compared with greenfield sites] and are likely to continue to be challenging”*.
- Paragraph 12.73 (Page 186) / Paragraph 12.100 (Page 190): *“... it would be necessary [for SBC] to be cautious in relying on brownfield sites in the five year land supply and overall housing trajectory, as the delivery of these is likely to continue to be challenging”*.

- 2.20 Whilst it is noted that the Viability Assessment identifies that brownfield sites are coming forward, it accepts that some have benefited from public sector intervention. Wain Homes questions whether there is any likelihood that public sector intervention will happen in the future and to what extent? Without any justification being provided by SBC in this regard, it is not a sound basis to assume that this might happen in the future in bringing forward the Central Area allocations.
- 2.21 Wain Homes also draws the conclusion from the findings of the Viability Assessment that the delivery of brownfield sites of the scale envisaged in the Central Area is unlikely to bring forward affordable housing at policy compliant levels. This is in contrast to Wain Homes own scheme for Land North of Redlands Farm which will deliver affordable housing.
- 2.22 Although Paragraph 12.89 of the Viability Assessment states that *“any final consideration of viability will be relating the results of this study to what is actually happening on the ground in terms of development and what planning applications are being determined”*, Wain Homes notes that town centre / Central Area regeneration at Kimmerfields has not happened for over 10 years. This is a relevant example and SBC should reconsider the emphasis it has placed in the Regulation 18 version of the new Local Plan on the scale of growth it is relying upon to deliver its housing requirements over the Plan period.
- 2.23 On the basis of the evidence set out the Viability Assessment, the proposed scale of new housing on brownfield sites in the Central Area is not justified. This indicates that such new housing in the Central Area will not be developed in the plan period.

Changes:

- 2.24 The scale and timing of new housing proposed in the town centre and Central Area should be reconsidered. Instead, an equivalent increase in the scale of new housing should be proposed elsewhere in the Borough, where it is demonstrably viable and deliverable in the Plan period.
- 2.25 On the basis that the development of sites in the Central Area will be dictated by market conditions (in particular in relation to their viability), these sites cannot be relied upon for significant delivery of new homes in the plan period. Instead, such sites should not be relied upon but left to the presumption in favour of sustainable development, and for greenfield sites to be allocated to meet SBC's overall housing requirement.
- 2.26 In this regard, and as stated in response to Policy SGL02, Wain Homes requests that the development boundaries of the NEV are redrawn to include land proposed for new homes on its site on Land North of Redlands Farm. The development of that land would bring forward up to 248 new homes, including 30% affordable housing.

Policy SGL 02 – New Eastern Villages (NEV)

Comments:

Scale of Development (Part 1)

- 2.27 Wain Homes note that, compared with the adopted Local Plan Policy NC3 allocation, SBC proposes to make significant changes to Policy SGL02.
- 2.28 It is not clear how the size of the allocation is being increased from 8,000 to 10,000 new homes. In Appendix 1 of the new Local Plan identifies 9 sites within the NEV which in total would deliver only

9,389 new homes. No justification is given as to how the shortfall will be accommodated (i.e. to make up to 10,000 new homes).

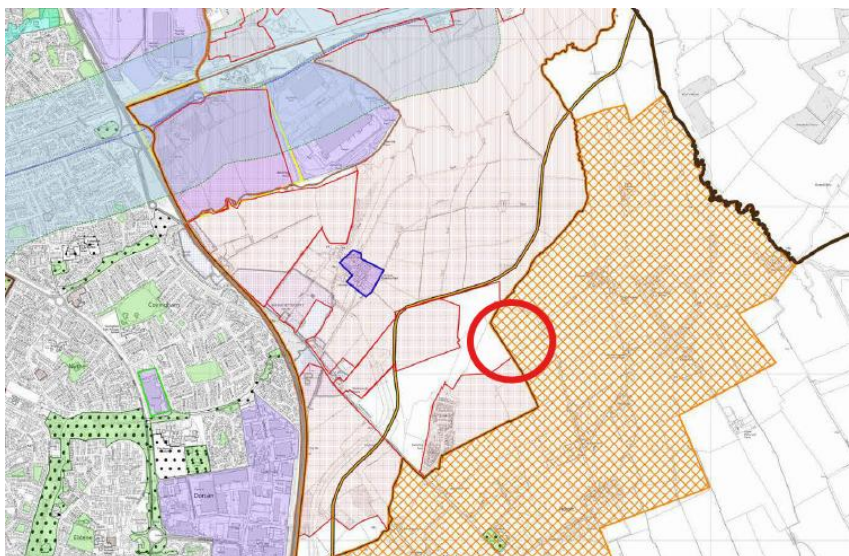
- 2.29 Of particular concern to Wain Homes is that that the Proposals Map in relation to NEV now proposes to exclude the development parcels within its site which were shown in the Council's 2021 masterplan (see also objection below). If the new Local Plan were to be adopted on this basis, the exclusion of those parcels – which are shown for housing in Wain Homes planning application – would significantly limit the ability of SBC to bring forward sufficient new homes (including affordable housing) to meet its total NEV housing requirement. This would further restrict the ability of SBC to meet its overall housing requirements given the concerns that Wain Homes has expressed in relation to viability of delivering growth in the town centre and Central Area.

Infrastructure Provision (Part 2(d))

- 2.30 Wain Homes also note that Part 2(d) of the draft Policy refers to the NEV Planning Obligations SPD in relation to providing necessary supporting infrastructure and Part 3 of the Policy (and Draft Appendix 5 of the draft Local Plan) refers to the NEV Infrastructure Delivery Plan Prioritisation Matrix. The SPD and Matrix were both approved 9 years ago.
- 2.31 Whilst Wain Homes supports the contribution of development to the timely delivery of infrastructure, it has concerns over the wording of this draft Policy to achieve this. In particular, the non-development plan status of the SPD which has not been the subject of examination or viability testing. In addition, given the age of the SPD and the Matrix, and the evolution of the proposals for the NEV (as included in the planning applications which have been submitted and approved in the intervening period), it is questionable as to whether their contents and proposals are still up-to-date.
- 2.32 Instead, such requirements for infrastructure delivery within the NEV should be addressed and considered as part the planning applications which continue to be submitted and determined by the Local Planning Authority. In this regard, any requests for infrastructure contributions should be determined in accordance with the Community Infrastructure Levy Regulations 2010 (as amended).

Area of Non-Coalescence (Part 5)

- 2.33 Wain Homes notes that changes have been made to the wording of the NEV policy (Part 6) in relation to areas of non-coalescence but part of the Wain Homes site still remains within this defined area. The area in question relates to the eastern half of a parcel of land which is promoted by Wain Homes for residential development as part of its hybrid planning application (see Plan below).

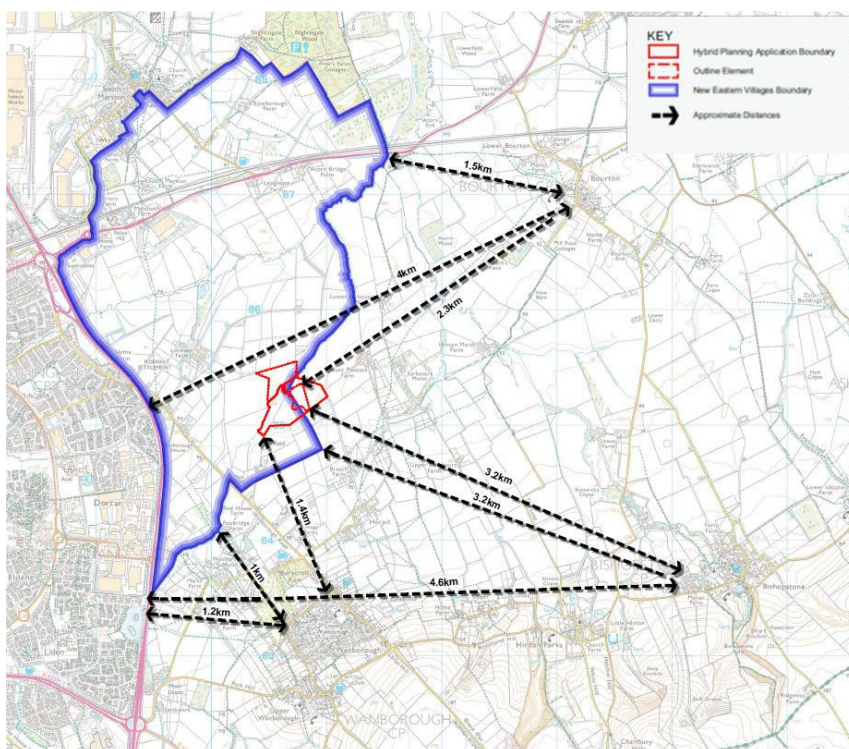


Area of Non-Coalescence within Land North of Redlands Farm

- 2.34 Wain Homes also notes that the area of non-coalescence which is included in its application site boundary follows an arbitrary line which runs midway through one of the fields it has identified as

being suitable for new homes. The choice of the policy area boundary identified by SBC is illogical and is not defined by any physical feature, such as a hedgerow, field boundary, fence line or watercourse.

- 2.35 The development of land for new homes within this small part of the area of non-coalescence will not materially diminish the separation of the NEV urban edge and the nearby settlements of Wanborough, Bishopstone and Bourton. This is evidenced on the following plan, and as identified in the Landscape and Visual Impact Assessment which forms part of the Environmental Statement which is submitted with Wain Homes planning application. The most outward extent of Wain Homes proposed development will not be located any closer to these named settlements than other parts of the NEV development which are located within the current NEV Masterplan area. Furthermore, the development of this half field, which is currently shown as an area of non-coalescence will not adversely affect the character and identity of Wanborough, Bishopstone or Bourton.

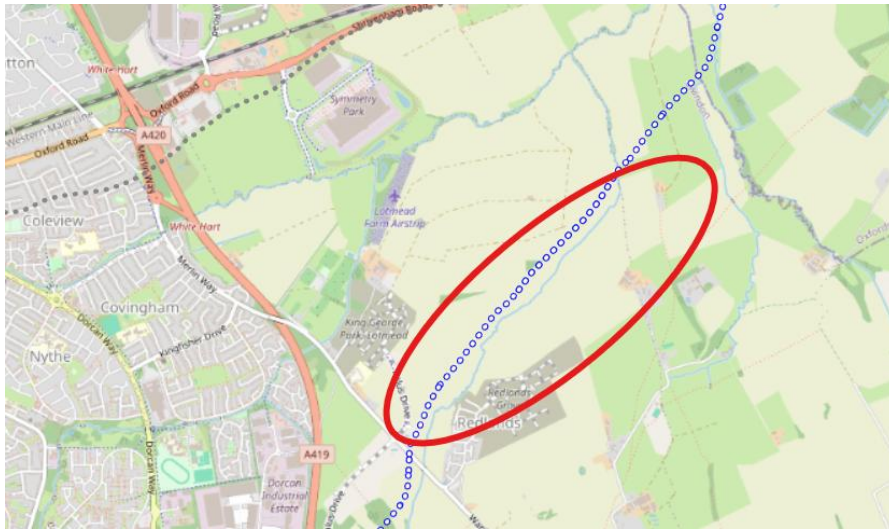


Separation Distances between the NEV and nearby settlements

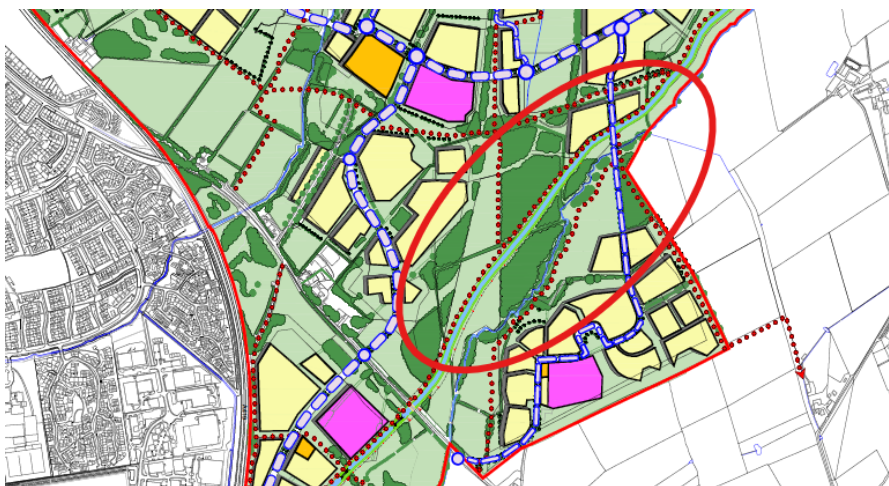
- 2.36 The principle of accepting development within the half field in this location (i.e. by moving the area of non-coalescence boundary to the edge of the field boundary in question) should be given positive consideration by SBC. The location of the Wain Homes site is in a sustainable development location which will benefit from and also support the proposed facilities and services which are proposed for delivery within the wider NEV.

Wilts and Berks Canal (Part 6)

- 2.37 Wain Homes planning application safeguards the route of the canal for future delivery and is an integral design feature of its proposed development on Land North of Redlands Farm.
- 2.38 However, Wain Homes notes that the new Local Plan Proposals Map now shows a different route for the canal. This is based on an alignment which appears to be based on the route included in the Local Plan which was adopted in 2015. There is a new alignment of the Canal which has been in existence for a number of years, as evidenced on the Wilts and Berks Canal Trust's website (see plan extract below), and which was shown on SBC's NEV Masterplan published in 2021 (see plan extract below).



Wilts & Berks Canal Trust Safeguarding Route



SBC NEV Masterplan 2021 Wilts & Berks Canal Safeguarding Route

- 2.39 The identification of the correct safeguarding route is essential for the future delivery of the canal in Swindon and to provide clear guidance to the developers of the NEV, to ensure that it is taken into account in their masterplanning of their developments. The new plan should be clear on the route of the canal and its programme for delivery.

Hedgerows (Part 7)

- 2.40 Part 7 of the Policy requires the layout of proposals to “*positively respond to existing hedgerows and opportunities to establish new hedges to define boundary edges*”. Whilst this is an important requirement, this is also a detailed development management matter and will be considered on a site by site basis as a matter of course with each planning application which is submitted in relation to the NEV (including the necessity in certain cases to remove hedgerows to facilitate this strategic scale development).

Changes:

- 2.41 Further justification is required for the extent of the changes proposed by SBC to the NEV allocation policy.
- 2.42 Part 1: SBC to provide justification for the increase in the size of the allocation from 8,000 to 10,000 new homes, including how and where the size of the allocation has been increased.

- 2.43 Part 1: The Proposals Map for the NEV is redrawn to include all of the development parcels included in its planning application within the developable area of the NEV.
- 2.44 Part 2(d): The Policy is reworded to require infrastructure provision to be determined as part the planning applications which continue to be submitted and determined by the LPA.
- 2.45 Part 5: The Proposals Map is redrawn to change the boundary of the areas of non-coalescence within the Wain Homes application, so that it follows an existing field boundary on the eastern side of the Wain Homes site.
- 2.46 Part 6: To ensure that the Wilts and Berks Canal can be reintroduced in Swindon in the future, in accordance with the objectives of the Canal Trust, SBC is requested to discuss this matter further with the Canal Trust to confirm its correct alignment at the NEV. In doing so, the safeguarding route should be changed to that the one which is identified on the Canal Trust's interactive route map (and as shown on SBC's 2021 NEV Masterplan).
- 2.47 Part 7: Wain Homes requests that this non-site specific requirements is removed from the Policy.
- 2.48 As a promoter of a significant development scheme within the NEV, Wain Homes would welcome further engagement with SBC following the close of consultation to discuss the comments raised above to enable them to comment more meaningfully to the next round of consultation.

3. Sustainable, High-Quality Development (Chapter 5)

SD3: High-Quality Design

Comments:

- 3.1 Part 5 of draft Policy SD3 introduces a requirement for all dwellings to meet, as a minimum, internal space standards set by the Nationally Described Space Standard (NDSS). The application of the NDSS requires justification in the new Local Plan evidence base and should only be done in accordance with the National Planning Policy Framework (NPPF). Footnote 51 of the NPPF states that *"Policies may also make use of the NDSS where the need for an internal space standard can be justified"*.
- 3.2 Paragraph 32 of the NPPF also states that all policies should be underpinned by relevant and up to date evidence, which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned. However, the Local Housing Needs Assessment and Update Annex which forms part of the evidence base of the new Local Plan makes only a limited reference to NDSS and provides no justification as to why the introduction of NDSS as a requirement is necessary or desirable for market or affordable housing. In view of this, there is inadequate evidence to substantiate its inclusion within draft Policy SD3.

Changes:

Part 5: The NDSS requirement should be removed from Policy SD3.

SD9: Heritage Transport

3.3 Comments:

- 3.4 In addition to its response to Policy SGL02, Wain Homes reiterates its comments about the route of the canal safeguarding corridor.
- 3.5 The current safeguarding route shown on the new Local Plan Proposals Map within the NEV is out-of-date compared with the line shown on the Canal Trust's interactive route map (and as also shown on the SBC 2021 NEV Masterplan). If the route shown in the new Local Plan is maintained as it is then it will lead to confusion from the developers whose land will be developed in the general vicinity of the safeguarding route as to whether they need to make provision for canal safeguarding or not.

Changes:

- 3.6 To ensure that the Wilts and Berks Canal can be reintroduced in Swindon in the future, in accordance with the wishes of the Canal Trust, SBC is requested to discuss this matter further with the Canal Trust to confirm its correct alignment at the NEV; and the Trust's detailed programme for the delivery of the canal.
- 3.7 The safeguarding route on the new Local Plan Proposals Map should be changed to that the one which is identified on the Canal Trust's interactive route map (and as shown on SBC's 2021 NEV Masterplan).

4. Places for People (Chapter 6)

SP2: Homes for the Community

Comments:

Part 1

- 4.1 Wain Homes supports the basis of calculating SBC's housing requirement for the Plan period, i.e. 1,205 new homes per annum.

Changes:

- 4.2 No change to Part 1.

HC2: Affordable Housing

Comments:

- 4.3 Wain Homes notes the inclusion in this Policy of specific requirements on affordable housing tenure.
- 4.4 Given the continuing uncertainty over how and whether affordable housing will be delivered by Registered Providers (who are focussing on their existing stock of housing, rather than bringing forward new homes), this Policy should be reworded to provide greater flexibility on the different tenures which will be accepted by SBC in future housing developments across the Borough.
- 4.5 By including flexible options for affordable housing tenures in this Policy, in line with NPPF definitions of affordable housing (including Discounted Sale), it will assist in reducing the incidents of stalled affordable housing delivery.
- 4.6 To provide further background to this particular response, please refer to the following note produced by the Home Builders Federation:

<https://www.hbf.co.uk/news/uncontracted-section-106-affordable-homes-october-2025/>

Changes:

- 4.7 This Policy should be reworded to include a more flexible range of affordable housing tenures which will be acceptable to SBC in meeting its affordable housing requirements.

HC3: Accessible Housing

Comments:

- 4.8 Part 1 of draft Policy HC3 requires all new C3 dwellings to be M4(2) adaptable and a minimum of 2% of all dwellings to meet M4(3) standards on sites of 0.5 hectares or 50 units or more. National policy and guidance only permits such standards to be introduced where appropriate evidence is provided. Taking into account the assessment within the Local Housing Needs Assessment and Update Annex, no justification appears to have been given as to these Policy requirements have been derived, or how the figure of 0.5ha / 50 units has been set for M4(3) requirements.

Changes:

- 4.9 Further evidence and explanation is required to justify the inclusion of these requirements. Any new requirements should be dictated by Building Regulations and at a national level.

5. An Environmentally Sustainable Swindon (Chapter 9)

CS1: Carbon Reduction and Sustainable Design in New Development

Comments:

- 5.1 Wain Homes acknowledges the importance of carbon reduction and sustainable design in new developments. However, the policy wording is general in meaning and provides overly simplistic requirements, such as “*should utilise the latest zero-low carbon technologies*” and “*achieve the highest viable levels of energy efficiency*”, extending well beyond Government targets, nationally adopted standards and up-to-date Building Regulation requirements.

Changes:

- 5.2 This policy should be simplified policy and reflect National policy and Building Regulations.

CSE3: Green Infrastructure in New Developments

Comments:

- 5.3 Wain Homes support the inclusion of multifunctional green space in new developments. However, the policy requirements in Parts 5 and 6 to the Urban Greening Factor and to Building with Nature are not supported by evidence as to what effect their implementation could have on the capacity / density of sites to deliver development, or upon their viability.

Changes:

- 5.4 Parts 5 and 6: Unless they can be justified, these requirements should be removed from the new Local Plan.

CSE6: Trees

Comments:

- 5.5 Wain Homes objects to the inclusion of a requirement for major development to achieve a future canopy cover of 25% of the site through retention, new planting and other green infrastructure.
- 5.6 SBC has not provided any evidence to demonstrate what the implications of imposing this policy requirement would have on the ability of development sites to deliver new homes on the scales envisaged in the new Local Plan allocation sites or on other sustainable development sites which might come forward during the Plan period.

Changes:

- 5.7 Unless appropriate justification and evidence can be given by SBC, this policy requirements should be removed from the new Local Plan.

CSE7: Landscape and Areas of Non-Coalescence

Comments:

- 5.8 Please refer to Wain Homes objection to Policy SGL02.

Changes:

- 5.9 The Proposals Map should be amended to redraw the area of non-coalescence within the NEV to exclude land within the Wain Homes application site at Land North of Redlands Farm. The boundary of the area of non-coalescence must follow robust and organic boundaries and not arbitrary lines through the middle of fields.

CSE9: Managing Flood Risk

Comments:

- 5.10 Wain Homes notes that, since the start of the new Local Plan consultation, the Government has updated its Planning Practice Guidance on Flood Risk and Coastal Change (17th September 2025).
- 5.11 Part 1(d): The reference made here to a drainage strategy “*that demonstrates the safe and discharge of surface and ground water from a development*” is not deliverable as currently worded. In particular, it is unclear as to how a development would demonstrate the safe discharge of groundwater. Changes are proposed below to ensure that this Policy is workable in relation to the delivery of development and covers, where required, infiltration type SuDs.

Changes:

- 5.12 This draft Policy should be reviewed and revised to take into account revised Government guidance on the sequential test.
- 5.13 Part 1(d): This requirement should be reworded to refer to “*the safe discharge of surface water*”, and remove the reference to groundwater.
- 5.14 Or to refer to the “*safe discharge of surface water from a development, taking in its effect on groundwater, where relevant, which must be...*”.
- 5.15 Following the updating of this Policy, Wain Homes will provide further comments on the wording and requirements of this Policy.

6. Conclusion

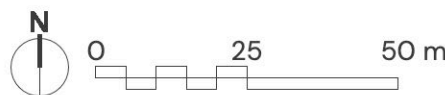
- 6.1 Wain Homes Severn Valley Limited ('Wain Homes') representations to the Swindon Local Plan 2023-2043 (Regulation 18) consultation are intended to support SBC in preparing a sound and deliverable Plan.
- 6.2 The delivery of new homes at Wain Homes' land interest North of Redlands Farm is essential to SBC in ensuring that the developments at Lotmead and Redlands are connected, as shown on the most recently published masterplan for the New Eastern Villages. This will ensure that the residents of the NEV can access the wide range of facilities and services which will be delivered across this Strategic Growth Location, including schools, shops and recreation. Without the proposed development of the Wain Homes site, this connection will not be provided.
- 6.3 Wain Homes proposed development will include 248 new homes. Based on a planning consent being issued in Spring 2026, the development can be completed by 2031/32. The delivery of this development will make a significant contribution towards SBC addressing its current 5 year housing land supply shortfall, which the Council estimates to be 4.90 years.
- 6.4 The full delivery of new homes at the Wain Homes site will also contribute towards SBC's objective to focus development at its Strategic Growth Locations. This will ensure that the full potential of the NEV to deliver sustainable development is achieved, including SBC meeting its housing target of 10,000 new homes in this location. In view of this, the new Local Plan should not scale back the extent of the developable area of the NEV as shown on its Proposals Map but fully reflect the areas which can be brought forward for sustainably located new homes as proposed by Wain Homes at its site.
- 6.5 Wain Homes' proposed development will not result in the coalescence of the NEV with the villages of Wanborough, Bishopstone and Bourton.
- 6.6 Wain Homes has also safeguarded land within its site for the route and future delivery of the Wilts and Berks Canal, a key SBC policy objective which forms part of the Local Plan. The proposed development also makes provision for sustainable drainage, open space, recreation and biodiversity net gain.
- 6.7 The responses provided here by Wain Homes are intended to help SBC develop its new Local Plan into a draft that will deliver sustainable development and can be considered sound. Given the inclusion of Wain Homes site within the overall boundary of the NEV Strategic Growth location, Wain Homes would welcome further engagement with the Council regarding emerging Policy prior to the next consultation.

Appendix A Wain Homes Illustrative Masterplan

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- KEY: INDICATIVE MASTERPLAN**
- HYBRID PLANNING APPLICATION BOUNDARY (SOLID LINE)
 - OUTLINE AREA
 - DETAILED AREA
 - PROPOSED SITE ACCESS
 - POTENTIAL LINK TO FUTURE NORTHERN DEVELOPMENT
 - RESIDENTIAL
 - PUBLIC OPEN SPACE
 - PROPOSED SUDS BASIN
 - SAFEGUARDED CANAL ALIGNMENT (INCLUDES 35M BUFFER ZONE AND CANAL TO BE DELIVERED BY THIRD PARTY)
 - INDICATIVE BUILT FORM
 - INDICATIVE BUILT FORM (LOW DENSITY)
 - PRIMARY STREET
 - SECONDARY STREET
 - SHARED SURFACE
 - PRIVATE DRIVES
 - FOOTPATH LINK
 - PROPOSED RECREATIONAL ROUTES
 - EXISTING VEGETATION (SEE TREE SURVEY FOR MORE DETAIL)
 - PROPOSED NEAP
 - PROPOSED INDICATIVE TREE PLANTING



Land North of Redlands Farm, Swindon – Indicative Masterplan



Contact

Nev Surtees
Associate Director



Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

Savills (UK) Limited. Chartered Surveyors. Regulated by RICS.
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Respondent No: 319

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title

Mrs

Q2. First Name

Julie

Q3. Last Name

Cahill

Q4. Job Title (where relevant)

not answered

Q5. Organisation (where relevant)

not answered

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q12. Please set out your comments below. Please be as precise as possible.

In Wroughton theres too much housing already Services are already under pressure, Doctors, transport, schools

Q13. Please set out the changes you consider are needed. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

not answered



Respondent No: 320

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Faye

Q3. Last Name McElwain

Q4. Job Title (where relevant) Senior Town Planner

Q5. Organisation (where relevant) NHS Property Services on behalf of Teresa Wallace of NHS Bath and North East Somerset, Swindon and Wiltshire Integrated Care Board

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

Q12. Please set out your comments below. Please be as precise as possible.

SBC admin note: Please see attached response.

Q13. Please set out the changes you consider are needed. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

not answered



**Bath and North East Somerset,
Swindon and Wiltshire**
Integrated Care Board



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13th October 2025

BY EMAIL ONLY

SwindonLocalPlan2043@swindon.gov.uk

RE: Consultation on Swindon Local Plan 2023 to 2043 (Regulation 18)

Thank you for the opportunity to comment on the above document. The following representations are submitted by NHS Property Services (NHSPS) on behalf of Bath and North East Somerset, Swindon and Wiltshire (BSW) ICB. Our comments on the Local Plan consultation reflect how the ICB and various system partners are working together at the system level to deliver the health priorities as articulated within the BSW Integrated Care Strategy.

NHS Bath and North East Somerset, Swindon and Wiltshire ICB

The NHS BSW ICB covers a large and varied geographical area that includes the densely populated and growing town of Swindon to the north, the historic city of Bath, Salisbury plains to the south, and the rolling Mendip Hills to the west. The ICB commissions (plans, designs, and purchases) many of the health services that the local population use, including medicines, hospital care, urgent and emergency services, mental health care, GP services, community pharmacy, dentistry, general ophthalmology (eye care services), and various community services.

To ensure that our health and care services meet the healthcare needs of the population living across BSW, we have three localities, each represented by place-based partnerships called Integrated Care Alliances (ICAs). Each ICA is made up of local doctors, hospital chief executives, clinical commissioners, council officers, patient and voluntary and social enterprise sector groups who lead the detailed design and delivery of integrated services across their localities and neighbourhoods. The ICB and its partners are therefore well placed to identify the implications of the Local Plan on healthcare infrastructure and services in the local area.

NHS Property Services

NHSPS is part of the NHS and is wholly owned by the Department of Health and Social Care (DHSC). NHSPS manages, maintains and improves NHS properties and facilities, working in partnership with NHS organisations to create safe, efficient, sustainable and modern healthcare environments. We partner with local NHS Integrated Care Boards (ICBs) and wider NHS

organisations to help them plan and manage their estates to unlock greater value and ensure every patient can get the care they need in the right place and space for them.

General Comments on Health Infrastructure to Support Proposed Housing Growth

The delivery of new and improved healthcare infrastructure is significantly resource intensive. The NHS as a whole is facing significant constraints in terms of the funding needed to deliver healthcare services, and population growth from new housing development adds further pressure to the system. New development should make a proportionate contribution to funding the healthcare needs arising from new development. Health provision is an integral component of sustainable development – access to essential healthcare services promotes good health outcomes and supports the overall social and economic wellbeing of an area.

Residential developments often have very significant impacts in terms of the need for additional primary healthcare provision for future residents. National policy and guidance set an expectation for development proposals that impact on local infrastructure to mitigate their impact to be considered sustainable. Given health infrastructure's strategic importance to supporting housing growth and sustainable development, it should be considered at the forefront of priorities for infrastructure delivery.

The ability to continually review the healthcare estate, optimise land use, and deliver health services from modern facilities is crucial. The health estate must be supported to develop, modernise, or be protected in line with integrated NHS strategies. Planning policies should enable the delivery of essential healthcare infrastructure and be prepared in consultation with the NHS to ensure they help deliver estate transformation.

We consider that the effectiveness of the Strategic Growth Strategies in addressing healthcare infrastructure needs would be improved by a more consistent approach to identifying the broad locations and type of healthcare infrastructure required to support the level of proposed growth in each of the identified strategic growth location. This would provide for internal consistency within the Plan and provide clarity on how additional healthcare capacity will be delivered to meet the needs arising from housing growth.

Existing Primary Care Infrastructure

There are 22 GP practices within eight Primary Care Network (PCN) in Swindon. There are existing deficits in overall GP floorspace capacity across all but one PCN, including the central Swindon area. Refer to Figure 1 and Table 1 for location of PCNs and assessments of existing capacity.

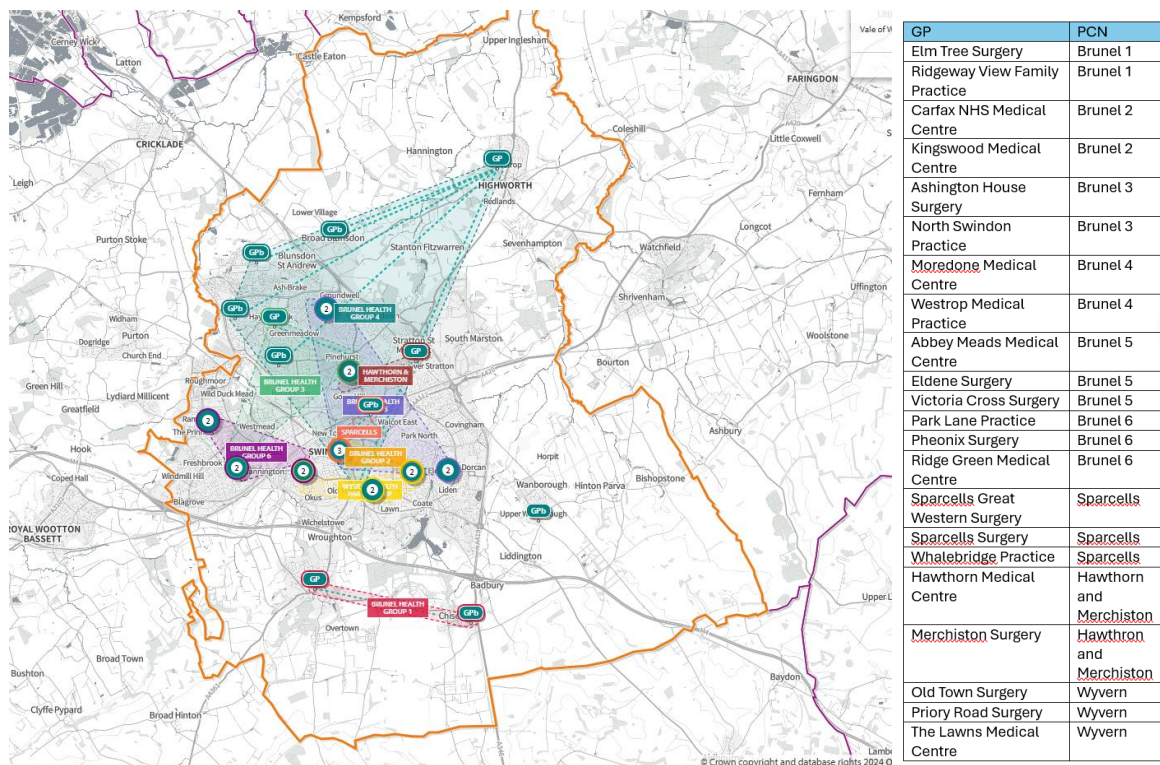


Figure 1. Existing Primary Care Network (PCN) in Swindon (Source; SHAPE Atlas September 2025)

PCN	Weighted patient list size (October 2023)	HBN 11-01 required floorspace (sqm NIA)	Existing floorspace (sqm NIA)	Space surplus or deficit (sqm)	% Capacity (existing against required floorspace)
Brunel 1	24,761	1,698	731	-967	43%
Brunel 2	26,687	1,830	953	-877	52%
Brunel 3	28,258	1,938	895	-1,042	46%
Brunel 4	44,596	3,058	3,564	506	117%
Brunel 5	30,515	2,092	1,504	-588	72%
Brunel 6	21,124	1,449	1,154	-294	80%
Sparcells	29,891	20,50	616	-1,433	30%
Wyvern	27,250	1,869	1,683	-186	90%
Hawthorn & Merchiston	27,084	1857	1282.1	-575	69%

Table 1. Existing PCN-level cumulative floorspace capacity. Source: calculated using a standard floorspace requirement of 120sqm net internal area (NIA) per 1,750 patients, aligned to Department of Health (DH) guidance in *Health Building Note 11:01: Facilities for Primary and Community Care (HBN 11-01)*.

Eight out of the nine PCNs in Swindon are experiencing a significant floorspace deficiency and therefore there is currently no capacity within the existing estate/premises as currently configured to accommodate the additional services that will be needed as a result of the population growth that would be generated by the new Local Plan. Although Brunel 4 currently has surplus capacity this is likely to be quickly absorbed by the scale of proposed developments in the Central Area.

The delivery of new and improved healthcare infrastructure is significantly resource intensive. The NHS as a whole is facing significant constraints in terms of the funding needed to deliver healthcare services, and population growth from new housing development adds further pressure to the system. New development will need to make a proportionate contribution to funding the healthcare needs arising from new development. Given health infrastructure's strategic importance to supporting housing growth and sustainable development, it should be considered at the forefront of priorities for infrastructure delivery in the new Local Plan.

Policy/Strategic Growth Area	Growth Capacity	Estimated Population	Indicative Primary Care Floorspace (sqm NIA)	Indicative Estate reconfiguration Capital Cost	Indicative New build Capital Cost
Policy SGL 01 Swindon's Central Area	8,000	19,200	1645.71sqm	£8,522,805	£11,026,286
Policy SCH 02 New Eastern Villages (NEV)	10,000	24,000	2057.14 sqm	£10,653,506	£13,782,857
Policy SGL 03 - Kingsdown	1,847	4,433	379.95 sqm	£1,967,703	£2,545,694
Policy SGL 04 -Wichelstowe	1,600	3,840	329.14sqm	£1,704,561	£2,205,257
Policy SGL – 05 East Wroughton	1,031	2,474	212.09 sqm	£1,098,377	£1,421,013
Policy SGL 06 – North Tadpole	513	1,121	105.53 sqm	£546,525	£707,061
Policy UGA 01 – Marlowe Avenue	976	2,342	200.78 sqm	£1,039,782	£1,345,207
Policy UGA 02 – Pipers Way	844	2,026	173.62 sqm	£899,156	£1,163,273
Total	24,811	59,436	5,103.96 sqm	£26,432,415	£34,196,648

Table 2. Proposed housing growth against indicative floorspace needs and capital cost for provision of additional primary care facilities in Strategic Growth Areas

Source: calculated based on average household size of 2.4 and standard floorspace requirement of 150sqm gross internal area (GIA) per 1,750 patients, aligned to Department of Health (DH) guidance within *Health Building Note 11:01: Facilities for Primary and Community Care (HBN 11-01)*.

The concentration of growth will be located in Swindon's Central Area and the New Eastern Villages (NEV) Strategic Growth Areas. The assessment in Table 2 above demonstrates that to support the proposed housing growth in the Central Area approximately 1,646 sqm of additional primary care floorspace is required. This has an indicative capital cost of between £8.5 million (extension/ refurbishment of existing premises) and £11 million (if a new build facility is required). In the NEV plan area to support the proposed housing growth 2,057sqm of additional primary care floorspace is required at an indicative cost of between 10.7 and 13.8million. The figures for the other strategic growth areas and the total requirements are also shown in table 2.

The ICB relies on capital funding from NHS England (NHSE) as one of the methods to support the construction, extension or reconfiguration of existing GP premises or NHS estate. NHSE allocates a capital envelope to the ICB usually annually that can be used for minor improvements to the existing estate. However, this allocation is usually oversubscribed and not sufficient for extensions or extensive works. System capital funding is allocated into the ICB for larger priority schemes which is across the acute, primary, and community care providers these are also normally oversubscribed and therefore does not support all of the schemes. As a result, most funding is allocated to schemes that maintain the current estate, prevent deterioration, and address other critical infrastructure risks.

As a result, the NHS and its partners will need to work with the Council in the formulation of a strategy to provide the additional primary care capacity that will be required to support growth within the Strategic Growth Areas. Options for consolidation, reconfiguration and development of existing premises should be considered as a first priority, however due to the condition and/or constraints on existing premises, it may also be necessary to consider provision of a larger, centralised new primary care facility. Given the scale of development concentrated into the Swindon Central Area and NEV areas, development of a Neighbourhood Hub (either in new or existing premises) could be an efficient solution to meet the healthcare demands of the new populations.

The council will need to continue working closely with the ICB to ensure a coordinated approach to planning healthcare infrastructure that considers and resolves the potential issues with funding, phasing of development, and site availability in the Strategic Areas. Potential solutions that could be considered are the potential of council-owned assets to accommodate health services, and how the release of excess commercial floorspace could also contribute to meeting the need for healthcare infrastructure.

The provision of adequate healthcare infrastructure is in our view critical to the delivery of sustainable development. We note that a draft IDP has been submitted as part of the evidence base for the Regulation 18 draft. We recommend that the above capacity analysis is incorporated into future iterations of the IDP and that the Council engage with the NHS on an on-going basis as part of the process. The prioritisation matrix contained in the IDP suggests that primary healthcare mitigation should be provided and in place close to early occupation of a scheme and we agree that this is essential, but we also want to highlight that funding for healthcare needs to be available in a timely manner to allow this to happen. A sound IDP must include sufficient detail to provide clarity around the healthcare infrastructure required to support growth, and to ensure that both planning obligations and the capital allocation processes for the CIL effectively support and result in capital funding towards delivery of the required infrastructure. We would welcome the opportunity to meet to discuss this further in due course.

Related to this, appropriate healthcare costs should be factored into the Local Plan Viability Assessment for relevant typologies. Such an approach means that developers are adequately informed in advance that they may be required to make contributions towards healthcare infrastructure. A separate cost input for health infrastructure in the plan viability assessment would ensure that healthcare mitigation is appropriately weighted when evaluating the potential planning obligations necessary to mitigate the full impact of a development. This is particularly important in situations where a viability assessment demonstrates that proposals are unable to fund the full range of infrastructure requirements.

Detailed Comments on Draft Local Plan Policies

Identifying healthcare infrastructure requirements

Health infrastructure should be clearly identified in the Local Plan as essential infrastructure, with an expectation that development proposals will make provision to meet the cost of healthcare infrastructure made necessary by the development. In areas of significant housing growth, appropriate funding must be consistently leveraged through developer contributions for health and care services to mitigate the direct impact of growing demand from new housing. Additionally, the significant cumulative impact of smaller housing growth and the need for mitigation must also be considered by the Plan.

We also emphasise the importance of effective implementation mechanisms so that healthcare infrastructure is delivered alongside new development, especially for primary healthcare services as these are the most directly impacted by population growth associated with new development. The NHS, Council and other partners must work together to forecast the health infrastructure and related delivery costs required to support the projected growth and development across the Local Plan area.

We recommend that the Local Plan have a specific section in the document (for example in the supporting text to the main policy **Policy D1: Developer Contributions and Viability**) that sets out the process to determine the appropriate form of developer contributions to health infrastructure. This would ensure that the assessment of existing healthcare infrastructure is robust, and that mitigation options secured align with NHS requirements.

The Local Plan should emphasise that the NHS and its system partners will need to work with the Council in the formulation of appropriate mitigation measures. NHSPS recommends that the Council engage with the Integrated Care Board (ICB) to add further detail within the Local Plan and supporting evidence base (Infrastructure Delivery Plan) regarding the process for determining the appropriate form of contribution towards the provision of healthcare infrastructure where this is justified

Healthcare providers should have flexibility in determining the most appropriate means of meeting the relevant healthcare needs arising from a new development. Where new development creates a demand for health services that cannot be supported by incremental extension or internal reconfigurations of existing facilities, this means the provision of new purpose-built healthcare infrastructure will be required to provide sustainable health services. Options should enable financial contributions, new-on-site healthcare infrastructure, free land/infrastructure/property, or a combination of these. It should be emphasised that the NHS and its system partners will need to work with the Council in the formulation of appropriate mitigation measures.

We are pleased to see that **Policy D1: Developer Contributions and Viability** identifies health infrastructure in the priority list for developer contributions. The policy places Health Infrastructure as the second priority in the list, where there is an identified need. The position in the list is welcomed. However, it should be noted that there should be a consideration of the overall planning balance, with the individual merits of each case taken into account. Notwithstanding this, residential developments often have very significant impacts in terms of the need for additional

primary healthcare provision for future residents. Given health infrastructure's strategic importance to supporting housing growth and sustainable development, it should always be considered at the forefront of priorities for infrastructure delivery.

We do however, have some concerns with the phrasing and terms used in the policy which we consider could be misleading and lead to undesirable outcomes.

For instance the wording used in Part 4 of the policy (highlighted in red below) does not appear to be consistent with national policy and would also not be legally compliant.

*Clause 2 establishes a priority list for contributions and is not exhaustive. Other contributions may be sought in line with the policies in this Plan where they are necessary, **reasonable and essential** to enable the development to proceed and where they are of an appropriate scale and kind to the development proposed.*

The text appears to be derived by the three legal tests set out in Regulation 122 which sets out the following requirements:

- a. necessary to make the development acceptable in planning terms
- b. directly related to the development; and
- c. fairly and reasonably related in scale and kind to the development

However, the policy as currently worded includes additional requirements as shown above in red text, which is not compliant with the relevant national legislation.

We also note that as currently worded, Part 5 of the policy conflicts with PPG on Viability as it suggests that a viability review mechanism should be used for all phased developments. Viability review mechanisms should only be explored where a scheme is not policy compliant and it should not be assumed that all schemes will be unviable, and therefore requiring a viability review, from the onset. To phrase the policy in this way could lead to a presumption for developers that they will be able to obtain viability exemptions for all schemes whereby policy compliance should always be the first aim for any scheme.

In addition, Part 6 of the policy should highlight that in many instances the trigger point for contributions should be on commencement, with specific triggers more suitable for strategic and larger major developments. It is important to note that enabling contributions to be paid on commencement means that the ICB can ensure that the required additional healthcare infrastructure capacity can be in place to serve the new population in a timely manner.

We have contained suggested wording in the recommendations section below for the points raised above.

Recommendations:

Policy D1 Part 4 should be rewritten to ensure it complies with national policy and the relevant legal tests and therefore removing reference to “reasonable and essential” in the policy wording.

Policy D1 Part 5. Suggested wording: “~~Where development is phased~~ Where a development proposes below policy compliant levels the Council may require a viability review mechanism as part of S106 requirements, whereby viability is reassessed at an appropriate time (or times) based on up-to-date values and costs. If such a review indicates a policy compliant scheme would then be viable, financial contributions will be sought up to the level required by policy.” -

Policy D1 Part 6. Payments secured through planning obligations will normally be required on commencement or at agreed trigger points, although some, for example monitoring fees, are paid upon signed agreement”.

Insertion to supporting text of Policy D1 to explain the process for healthcare infrastructure contributions.

- Assess the level and type of demand generated by the proposal
- Work with the ICB to understand the capacity of existing healthcare infrastructure and the likely impact of the proposals on healthcare infrastructure in the locality.
- Identify appropriate options to increase capacity to accommodate the additional service requirements and associated capital costs of delivery.
- Identify the appropriate form of developer contributions.

Infrastructure & Developer Contributions

We welcome the inclusion of proposed **Policy HL5: Community Infrastructure** which states that proposals over 100 units should contact BSW ICB in the early stages of a development scheme. However, we acknowledge that smaller developments collectively may have a significant impact on healthcare infrastructure and therefore we would request that this is reduced to 50 so that the ICB is aware and can assess cumulative impacts. It is also noted that the policy does not specifically highlight that BSW ICB is the organisation for healthcare infrastructure delivery and it is recommended that the text is refined to make this clear and therefore more effective.

We would also like it highlighted that both on-site and off-site contributions for the provision to community infrastructure should be possible. This is critical for the delivery of schemes to mitigate the impact on health infrastructure as in most cases the NHS seek off-site contributions to extend or reconfigure existing practices and developments have to be very large for a new facility to be necessary and/or feasible. The policy, as written, seems to suggest that on-site provision would be appropriate in all but exceptional cases. However, in most cases, a contribution towards improvements to existing GP practices will be the most appropriate form of mitigation.

We also acknowledge that **Policy HL5: Community Infrastructure** sets out that the proposed policy approach will continue to support the development of new community facilities and protect the loss of existing facilities, unless demonstrated that it is surplus or not capable of continued use by retaining the facility.

Notwithstanding this, it is important to note that policies aimed at preventing the loss or change of use of community facilities and assets can potentially have a harmful impact on the NHS's ability to ensure the delivery of essential facilities and services for the community.

The NHS requires flexibility with regards to the use of its estate to deliver its core objective of enabling excellent patient care and support key healthcare strategies such as the NHS Long Term Plan. In particular, the disposal of sites and properties which are redundant or no longer suitable for healthcare for best value (open market value) is a critical component in helping to fund new or improved services within a local area. Requiring NHS disposal sites to explore the potential for alternative community uses and/or to retain a substantial proportion of community facility provision adds unjustified delay to vital reinvestment in facilities and services for the community.

All NHS land disposals must follow a rigorous process to ensure that levels of healthcare service provision in the locality of disposals are maintained or enhanced, and proceeds from land sales are re-invested in the provision of healthcare services locally and nationally. The decision about whether a property is surplus to NHS requirements is made by local health commissioners and NHS England. Sites can only be disposed of once the operational health requirement has ceased. This does not mean that the healthcare services are no longer needed in the area, rather it means that there are alternative provisions that are being invested in to modernise services.

Where it can be demonstrated that health facilities are surplus to requirements or will be changed as part of wider NHS estate reorganisation and service transformation programmes, it should be accepted that a facility is neither needed nor viable for its current use, and policies within the Local Plan should support the principle of alternative uses for NHS sites with no requirement for retention of a community facility use on the land or submission of onerous information. To ensure the Plan is positively prepared and effective, we are seeking an insertion to the policy as shown in the recommendations box below.

Lastly, to reflect NHSPS' response in relation to **SD3: High Quality Design** (see below) we would expect the implementation of HL5 2. to also include early engagement discussions on securing well-designed healthcare developments.

Recommendations:

Alterations to policy HL5 text 1a:

ensure that the infrastructure, including enhancement or extension of existing infrastructure, is provided by either direct provision on-site or off-site in the form of a financial contribution in lieu where appropriate.

Also in para 10.12 of the supporting text– please add in here improvements to existing facilities, which could include improvement works to existing practices, such as extension and reconfiguration works

Include in Policy HL5 2 reference to well-designed healthcare developments during pre-application engagement.

- Recommended wording changes

2. Proposals of over ~~400~~ 50 units should consult with appropriate bodies (such as the Bath and North East Somerset, Wiltshire and Swindon ICB or any successor organisation in the case of health infrastructure) at an early stage of preparing a planning application including securing high quality design and sustainable development.

Insertion of text to Policy HL5

- Where healthcare facilities are formally declared surplus to the operational healthcare requirements of the NHS, or identified as part of a published estates strategy or service transformation plan the requirements listed under part 4 (a-g) of the policy shall not apply.

Health and Wellbeing

NHSPS support the inclusion of policies that support healthy lives as proposed **Policy SP7 Healthy Living**. There is a well-established connection between planning and health, and the planning system has an important role in creating healthy communities. The planning system is critical not only to the provision of improved health services and infrastructure by enabling health providers to meet changing healthcare needs, but also to addressing the wider determinants of health.

All developments should demonstrate how they are supporting healthy places and lives, addressing physical and mental health impacts and helping to reduce health inequalities through the planning system. In doing so, they should demonstrate how they are meeting identified local health needs and supporting the delivery of local health, wellbeing and estate infrastructure strategies.

1. Optimise early and proactive engagement with the director of public health, NHS and health system partners in support of delivering local health needs and priorities.

2. Utilise appropriate design tools and formal assessments to demonstrate how developments enable and support healthy lives across the general health determinants.

3. Provide opportunities for people to improving physical activity through active travel modes that ensure developments are well connected to employment, health and leisure facilities and public transport.
4. Encourage safe, secure and public spaces and places that promote community cohesion and optimise inclusive access for the general population and specific groups.
5. Promote sustainable developments that consider the health impact of climate change impacts and help deliver local objectives for net zero and improved air quality.
6. Provide access to a healthy food environment, including managing appropriate locations of food and drink uses, and making space for food growing opportunities (allotments and/or providing sufficient garden space).
7. Make provision for key worker affordable housing, in particular NHS workers, where there is identified local housing need.
8. Provide sufficient opportunities for access to and contact with the natural environment in all developments including community facilities.
9. Deliver improved or new healthcare infrastructure with good accessibility in neighbourhoods of high deprivation or town centre locations.

We acknowledge that Healthy Living is a strategic policy followed by a number of non-strategic/development management policies.

It should be noted that the NPPF Paragraph 98 b) requires planning policies to take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community. The Swindon Health and Wellbeing Strategy 2023-2033 is a legal document required by the Health and Social Care Act 2012, approved and published by the statutory Swindon Health and Wellbeing Board. Therefore in order to comply with the NPPF, in either the Introduction of **Policy SP7: Healthy Living** policy wording and/ or the Supporting Text, it will be necessary to reference the Swindon Health and Wellbeing Strategy 2023-2033, as well as the Bath and North East Somerset, Swindon and Wiltshire Integrated Care System (BSW Together) Integrated Care Strategy 2023-2028. These two documents should set the wider health context in which the Local Plan as a whole, **Strategic Objective S07** and **Policy SP7: Healthy Living** operate as required by the NPPF.

The NPPF at Paragraph 27 a) also requires plans to plan for delivery of strategic and neighbourhood health infrastructure. The Government and the 10 Year Health Plan shifts access to health to the neighbourhood and the provision of neighbourhood health centres. This move to new models of health and care should be explicitly reflected in this policy and **Policy HL5: Community Infrastructure** and supporting the health requirements identified in Reg 18 Infrastructure Delivery Plan.

- **Recommendations:**
- - Include specific references and justification in the Introduction describing how Policy SP7 supports the delivery of the Swindon Health and Wellbeing Strategy and the Integrated Care Strategy.
- - Include a strengthened policy 1. d. to explicitly identify “the provision of accessible new and improved community facilities to support new developments, including healthcare.”
- - Include a further bullet point on promoting access to healthy food environments partly addressed by Policy FE5.
- Suggest supplementary Supporting text: “The provision of new or improved healthcare infrastructure should be considered in conjunction with the NHS and align with the most up to date health strategies for the area.”
- - SP7 can be presented more clearly by signposting to other relevant policies under each bullet point to demonstrate a health in all policies approach as recommended by organisations such as the Local Government Association and the Association of Directors of Public Health.

Health Impact Assessments

We generally support the inclusion of **Policy HL1: Health Impact Assessment** for Health Impact Assessment (HIA) on significant residential developments.

We note that the policy requires HIA to be carried out for major developments over 100 units and other specified developments. NHSPS observes that the current adopted local plan Policy SD3 encourages HIA for significant development areas only. The 2024-25 AMR identified 48 major applications determined by the LPA and did not include results of percentage or significant development proposals accompanied by a HIA.

On the point of implementation, it is unclear from the Policy and Supporting Text how the LPA intends to deliver and resource the Policy given the potential numbers of eligible applications, as observed in the AMR, that may be subject to HIA which may exceed previous years.

It is also unclear what the justification is in Policy HL1 for including other non residential development types subject to HIA - a) Education, b) Health and c) Leisure or Community, and without an indication of their scale that may have health impacts requiring analysis. This causes great concern. These development types can be generally considered to be developments that meet or are supported by local need and will likely have a positive impact as community infrastructure. Including these public service infrastructure within the HIA threshold will likely place unnecessary financial cost in undertaking a HIA, including on the NHS when bringing forward health facilities.

Also, the Policy is unclear about the benefits of undertaking a HIA beyond presenting an analysis for the Council to undertake further assessment. In line with emerging good practice from other adopted local plan policies on HIA, the Policy can be more effective if reworded to require planning applicants to clearly demonstrate how the HIA analysis has informed the development proposal

thereby ensuring health impacts are already addressed in the submitted application, and further mitigation to be considered in planning conditions or obligations.

In redrafting the Policy, further guidance and clarity is required from the Council on how this Policy should be implemented which may be more appropriate in the form of an SPD rather than set in policy wording. Developing further guidance should be done in line with established best practice and advice provided by the local public health team and in consultation with the Office for Health Improvement and Disparities (formerly Public Health England) in the Department of Health and Social Care. Where the HIA includes assessing healthcare needs, such guidance should be done with advice from NHS Property Services.

We request that when developing any future guidance on detailed HIA requirements, the Council engages with the NHS in the process as early as possible.

**Recommendations:
Policy HL1**

- Remove b) health facilities.
- The Council is advised to develop further planning guidance to provide planning applicants with specific information on HIA requirements in line with established best practice and advice provided by national and local public health professionals, and NHS Property Services on assessing healthcare needs from residential developments.
- Recommended wording changes:
 2. Development proposals will be supported where it can be demonstrated that they have been informed by the analysis of a Health Impact Assessment. A Health Impact Assessment is required to be submitted as part of the planning application for major development proposals of over 100 units, and ~~developments which contain~~ any of the following uses which may be expected to have health impacts:
 - a) ~~Education facilities~~
 - b) ~~Health facilities~~
 - e) ~~Leisure or community facilities~~
 - a) d) Hot food takeaways/hot food outlets within 400 metres of where young people congregate, including primary and secondary schools
 - b) e) New betting shops, gaming arcades, casinos and amusement arcades
 - c) f) Public houses or retail units where the off-sales of alcohol can be reasonably expected.
 4. The level of detail should be proportionate to the scale of the development and agreed with the relevant case officer. The Council will provide further HIA guidance for planning applicants to comply with the requirements of this Policy.

Concentration of Uses

We support the inclusion of **FE5: Concentration of Uses** which aims to control the proliferation of uses deemed to have a detrimental impact on healthy life choices.

In particular we want to focus our comment on the overconcentration and school proximity measure of fast food outlets.

The use of the planning system to promote a healthy food environment is part of a wider public health approach to addressing obesity. In this context and to ensure the Policy is justified and can demonstrate it can pass the Soundness Test, there is a need to reference Swindon's Whole Systems Approach to Healthy Weight strategy 2023-2033 priority 1 on 'Improving the food environment and making healthy food choices easier'. The need to demonstrate to the Planning Inspectorate that the Policy is set within a wider council approach to addressing health and obesity is consistent with findings from research of policies that were found sound and unsound (See [Using the planning system to promote a healthier food environment: review of planning policies and appeal decisions in England for hot food takeaways, Town Planning Review](#)). Without this reference to Swindon's health strategy, it is unclear whether the current Policy is sufficiently justified in the local.

Health promoting retail uses should be encouraged around healthcare and community facilities to help support healthy behaviours in certain population groups including patients and children and young people. Where there may be overconcentration or proximity issues on unhealthy uses listed in FE5 1 which are close to health, care and community facilities, planning applicants should be encouraged to proactively consult with NHS bodies particular pre-application during the Health Impact Assessment process.

Recommendations:

- Provide further Supporting Text on setting the Policy in context of Swindon's Whole Systems Approach to Healthy Weight Strategy 2023-33.

- Recommended wording changes:

2. The Council will not permit proposals for these uses that are:

b. not accompanied by a Health Impact Assessment and demonstrated outcomes of consultation with relevant NHS and health authorities.

Design

NHSPS is supportive of **Policy SD3: High Quality Design** and notes that the Policy's General Design Principles refer to all developments. There is significant evidence that well-designed healthcare developments can have an impact on patient care, staff safety, and satisfaction while boosting recovery attributes from physical or mental illnesses. They can also provide benefits on the general health determinants similar to well-designed residential developments.

Because of the importance and physical presence of health facilities in the community such as on the high street or as part of a major development, the design and location of healthcare developments should also contribute to the process of healing and population health improvement as well as being a place where treatment takes place.

In this context, NHSPS is creating a framework of healthy design considerations to support well-designed and high quality healthcare development proposals. The Supporting Text for this Policy under SP1: Sustainable Development can be clear about positive and early engagement with the

NHS in the design of healthcare facilities and especially on masterplans of major sites. This can help deliver Policy SD3. 3. b. in relation to ensuring accessibility to a wide range of specific health needs.

Recommendations:

- Include in the Support Text reference to positively and early engagement with relevant NHS bodies in informing the well designed and high quality healthcare developments.

Affordable Housing

It is understood that the Swindon Local Housing Needs Assessment and Update is currently in draft form and we would welcome sight of this document as it emerges as a key evidence base for the local plan.

In undertaking further work on local housing needs, we suggest the Council consider the need for affordable housing for key workers, and in particular, NHS staff given the levels of affordability in the authority area. We would be happy to meet to discuss this matter further prior to Regulation 19 stage.

The sustainability of the NHS is largely dependent on the recruitment and retention of its workforce. Most NHS staff need to be anchored at a specific workplace or within a specific geography to carry out their role. When staff cannot afford to rent or purchase suitable accommodation within reasonable proximity to their workplace, this has an impact on the ability of the NHS to recruit and retain staff.

Housing affordability and availability can play a significant role in determining people's choices about where they work, and even the career paths they choose to follow. As the population grows in areas of new housing development, additional health services are required, meaning the NHS must grow its workforce to adequately serve population growth. Ensuring that NHS staff have access to suitable housing at an affordable price within reasonable commuting distance of the communities they serve is an important factor in supporting the delivery of high-quality local healthcare services. We recommend that the Council:

- Engage with local NHS partners such as the local Integrated Care Board (ICB), NHS Trusts and other relevant Integrated Care System (ICS) partners.
- Ensure that the local need for affordable housing for NHS staff is factored into housing needs assessments, and any other relevant evidence base studies that inform the local plan (for example employment or other economic policies).
- Consider site selection and site allocation policies in relation to any identified need for affordable housing for NHS staff, particularly where sites are near large healthcare employers.
-

Open Space

We generally support policy **HL2: Protecting Open Space** as we acknowledge the health benefits in protecting spaces for social and recreational uses. However, we would like it noted that the NHS often require flexibility to be taken into account when planning for and undertaking healthcare infrastructure improvement projects. In exceptional circumstances this may involve the use of land that is currently in use as open space. Although this would be avoided where possible, we recommend that an acknowledgment of this is included in the emerging Local Plan.

Recommendations:

Proposed insertion to support the text of Policy

There may be exceptional circumstances in which improvements to social infrastructure facilities may require the use of land currently in use as open space to enable the project to be delivered. This will be treated on a case-by-case basis and only where other options have been discounted.

Monitoring

NHSPS notes the proposed set of indicators in **Appendix 4**. The previous year's Authority Monitoring Reports for 2024-25 reported against only some indicators from the current adopted local plan monitoring framework.

NHSPS supports KPI16 and 17 on community infrastructure. Any reporting in AMRs should be able to disaggregate changes in the types of community infrastructure on for example health, education and leisure. This can ensure the data can be useful to both the Council and relevant infrastructure providers such as the NHS and integrated care boards to review performance in supporting their infrastructure plans.

NHSPS suggests an additional KPI under Housing or retitled Health and Community Infrastructure to monitor the number of Health Impact Assessment submitted and assessed by the Council pursuant to Policy HL1. This can be achieved by simply documenting how many HIAs were submitted as part of the validation process and would be particularly helpful for the local public health team and the NHS. NHSPS notes that the 2024-25 AMR HIA indicator did not have available information.

Recommendations:

- Information collected under KPI16 and 17 should be able to be disaggregated into different development types such as health facilities.
- Additional KPI in support of Policy HL1: Number of applications accompanied by a Health Impact Assessment and assessed by the Council.

Sustainability Appraisal

NHSPS notes that the draft plan is accompanied by a Sustainability Appraisal (SA) Scoping and Interim Reports, and that Communities, Equalities and Health is identified in the Scoping Report and appraised in the Interim Report.

In order that health provision is sufficiently addressed in the Sustainability Appraisal we refer back to our comments in relation to 'Identifying Healthcare Infrastructure Requirements' above. We would recommend that the SA methodology, in assessing effect on health provision, is consistent with our methodology and recommendations as set out in this section.

NHSPS notes that under the evidence review for 6. Communities, Equalities and Health in the Scoping Report, there is limited information provided relating to scoping the need for health facilities in paras 6.1.26 to 6.1.28. There is a need to include the ICB's estates infrastructure plan, which is in approval stages, to identify the extent to which the Local Plan and site allocations and different scenarios should accommodate additional healthcare need. This should include adequate consideration and relevance of the Government's plans for new Neighbourhood Health Centres or health hubs in the assessment under the Accessibility issue. This consideration should include engagement with the ICB and relevant NHS bodies.

NHSPS notes that the Interim Report Section 6.2. Accessibility (to community infrastructure) does not identify how and whether strategic health infrastructure such as the Neighbourhood Health Centres of health hubs will be accommodated. There should be additional engagement with the ICB and relevant NHS bodies.

Recommendations:

- Undertake specific engagement with the ICB and relevant NHS bodies as part of the final SA reporting process to ensure sufficient consideration is provided to the scope and scale of health provision needed under each Scenario.

Appendix 5 NEV Infrastructure Delivery Plan Prioritisation Matrix

We note that the prioritisation matrix was approved by the committee in 2017. However, due to a necessity to undertake further viability review we suggest that this is revisited and reformed alongside the ongoing IDP process.



**Bath and North East Somerset,
Swindon and Wiltshire**
Integrated Care Board



Property Services

Conclusion

NHS BSW ICB respectfully request the above representations on the proposed submission documents are taken into consideration prior to submission of the Local Plan for examination.

We would welcome further engagement in the coming months in relation to the above, and should you have any questions, please contact us at [REDACTED]

Yours sincerely,

Teresa Wallace

Senior Estates Manager and Advisor
NHS Bath and North East Somerset, Swindon
and Wiltshire Integrated Care Board

Faye McElwain

Senior Town Planner
NHS Property Services



Respondent No: 321

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- Q1. Title Mrs
- Q2. First Name Fiona
- Q3. Last Name Wills
- Q4. Job Title (where relevant) Retired
- Q5. Organisation (where relevant) not answered

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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Q12. Please set out your comments below. Please be as precise as possible.

More houses in Wroughton is not viable due to the infrastructure of the village. This will increase the size of the village by 25%. The roads are wide enough to accommodate this amount of extra traffic. Thames water are constantly making repairs to their pipes damaged due to the amount of heavy traffic through the village. I am unable to have my windows open at the front of my house due to noise and pollution from Swindon Road which will only get worse if this development goes ahead. This area is thriving with wildlife that will be pushed further into town environment which will cause accidents on roads mainly roe deer and muntjacs deer.

Q13. Please set out the changes you consider are needed. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

not answered



Respondent No: 322

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title

Mr

Q2. First Name

Andrew

Q3. Last Name

Freegard

Q4. Job Title (where relevant)

Chairman

Q5. Organisation (where relevant)

Swindon Needs Speedway

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

Q12. Please set out your comments below. Please be as precise as possible.

SBC admin note: Please see attached response.

Q13. Please set out the changes you consider are needed. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

SBC admin note: Please see attached response.

Swindon Needs Speedway
Proposed Policy
to Protect Abbey Stadium, Blunsdon
for the Swindon Local Plan 2023 – 2043



13 October 2025

1. Introduction

- 1.1 On adoption, the 2043 local plan will replace the current Swindon local plan 2026. It will set a strategic vision for housing, employment, infrastructure, transport and the environment to support sustainable growth that meets the needs of residents, businesses and the community.
- 1.2 The local plan is a key planning document. Amongst other things it sets out housing and employment needs and allocations, policies and strategies and how national and local objectives to achieve economic growth across the borough will be met.
- 1.3 This document sets out a proposed policy for the Swindon Local Plan 2023–2043 to protect Abbey Stadium, Lady Lane, Blunsdon, as a strategic leisure and motorsports facility. The policy aims to safeguard the site for Speedway and community leisure use, opposing its redevelopment for housing unless strict criteria are met.
- 1.4 Key policy provisions include:
 - Retention of Abbey Stadium's leisure and motorsports designation.
 - Restrictions on redevelopment unless the facility is proven surplus, replaced locally, and supported by the community.
 - Recognition of the stadium's cultural, historic, and social value.
- 1.5 The justification draws on national planning policy (NPPF), Swindon's Playing Pitch and Outdoor Sports Strategy 2025, and strong community opposition to the loss of the stadium.
- 1.6 It concludes that Abbey Stadium should remain protected until a suitable, operational replacement for Speedway is delivered within Swindon Borough.



Abbey Stadium c2010 - Swindon Advertiser



2. Executive Summary

Policy and Justification for Protection of Abbey Stadium, Swindon.

Policy: Protection of Abbey Stadium for Motorsports and Community Leisure Use

2.1 Designation and Protection

- Abbey Stadium, Lady Lane, Blunsdon, is recommended for designation as a strategic leisure and motorsports facility of local and regional significance.
- The site shall be safeguarded for Speedway, motorsports, and associated community leisure uses.

2.2 Loss or Redevelopment

Proposals involving the loss, partial loss, or redevelopment of Abbey Stadium for non-leisure uses, including residential development, will only be permitted where it can be robustly demonstrated that:

- (a) An independent assessment, undertaken in accordance with Sport England and national planning guidance, has clearly shown the facility to be surplus to current and future requirements for motorsports and community leisure use; and
- (b) Equivalent or better replacement provision for Speedway and motorsports is delivered and operational within Swindon Borough, in a location accessible to the existing community and fanbase; and
- (c) There is clear and demonstrable community support for the loss or change of use, evidenced through comprehensive engagement.

2.3 Coventry Stadium Appeal Decision Precedent

After 9 days of evidence an appeal to redevelop the Coventry Stadium site in Brandon—formerly home to the Coventry Bees Speedway team—was dismissed by a Planning Inspector in January 2024. The proposed redevelopment included 124 homes, sporting facilities and open space, but was originally refused by Rugby Borough Council in November 2022.

The Inspector concluded that the national importance of the stadium for Speedway outweighed the benefits of the proposed housing scheme. She found that the stadium was not surplus to requirements, and that the redevelopment did not adequately compensate for the loss of a unique sporting venue.

The key planning arguments that led to the dismissal of the Coventry Stadium Appeal:

- (a) Retention of a Nationally Significant Sporting Venue
The Inspector concluded that Coventry Stadium is not surplus to requirements. It holds national importance for Speedway, and its loss would be detrimental to motorsport heritage.
- (b) Conflict with National and Local Planning Policy
The proposed redevelopment conflicted with National Planning Policy Framework (NPPF), particularly:
 - Paragraph 104: which requires that sports facilities should not be built over unless they are surplus or replaced with equivalent or better provision.
 - The Inspector found no adequate replacement for the stadium's unique sporting function.



(c) Community and Heritage Value

- The stadium was seen as a community asset with deep cultural and sporting ties.
- The Inspector gave weight to public support and the efforts of the Save Coventry Speedway and Stox campaign group, who demonstrated the stadium's viability and potential for reuse.

(d) Inadequate Replacement Proposals

- The proposed sports facility and open space were deemed not comparable in character or function to the motorsport venue.
- The Inspector found that the benefits of the housing scheme did not outweigh the loss of the stadium.

(e) Consultation and Transparency Issues

Concerns were raised about the consultation process, which allegedly ignored strong public support for retaining the stadium.

2.4 Community and Cultural Value

In assessing proposals, significant weight will be given to:

- The cultural, historic, and social value of Abbey Stadium as the home of Swindon Robins Speedway and its role in Swindon's sporting heritage.
- The findings of the Swindon Playing Pitch and Outdoor Sports Strategy 2025, which recommends the protection of Abbey Stadium for future motorsports or outdoor sports use.

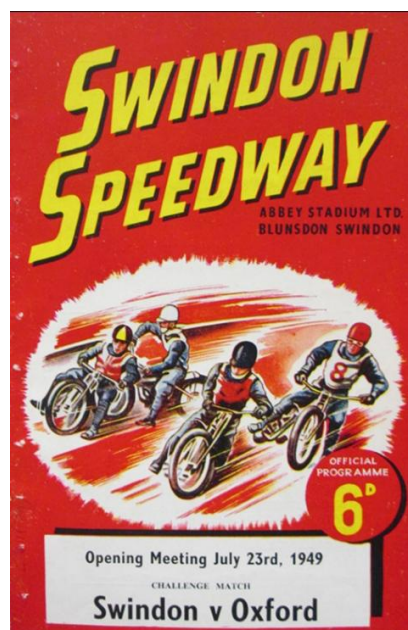
2.5 Alternative Uses

Proposals for alternative leisure or community uses must demonstrate that they:

- Retain the site's capacity for motorsports or provide for its future reinstatement;
- Deliver clear and substantial community benefits that cannot be achieved elsewhere.

2.6 Prematurity

The loss of Abbey Stadium to non-leisure uses will be considered premature unless and until a suitable, operational replacement for Speedway and motorsports is delivered within Swindon Borough.



3. Supporting Justification

Abbey Stadium is a unique and irreplaceable asset for Swindon's sporting, cultural, and community life. It has served as the home of the Swindon Robins Speedway team for over 70 years and is recognised in the Swindon Playing Pitch and Outdoor Sports Strategy 2025 as a site of "local significance" that should be protected for potential future motorsports or outdoor sports use.

3.1 National and Local Policy Context:

The National Planning Policy Framework (NPPF, para. 104) and Swindon Local Plan Policy CM4 both require that sports and community facilities should not be lost unless it is clearly demonstrated that:

- The facility is surplus to requirements,
- The loss is replaced by equivalent or better provision in a suitable location, or
- The development is for alternative sports/recreation provision with clear benefits.

The Abbey Stadium planning application does not meet these tests:

- No assessment has shown the stadium to be surplus to current or future requirements for motorsports or community leisure.
- No equivalent or better replacement for Speedway is operational within Swindon Borough; the proposed alternative at Studley Grange is outside the Borough and not yet delivered.
- The alternative sports provision (cricket nets, padel courts) does not address the unique requirements or cultural value of Speedway/motorsports.

3.2 Community and Cultural Value:

Consultation on the planning application revealed overwhelming community opposition to the loss of Abbey Stadium. The applicant's own Statement of Community Involvement shows that 73% of local respondents opposed the principle of development, with the most cited reason being the loss of leisure/sport/community facilities, especially Speedway. Many referenced national policy and recent appeal decisions (e.g., Coventry Stadium) as reasons to retain or replace the stadium before redevelopment.

3.4 Prematurity and Strategic Importance:

Abbey Stadium could be brought back into use for Speedway, motorsports or other leisure. Its loss would be premature and irreversible, especially in the absence of a robust, locally accessible replacement. The stadium's cultural, historic, and social value as the home of Swindon Robins and its role in Swindon's sporting heritage must be given significant weight in planning decisions.

3.5 Alignment with Evidence Base:

The Swindon Playing Pitch and Outdoor Sports Strategy 2025 recommends the protection of Abbey Stadium for future motorsports or outdoor sports use, reflecting both its heritage and potential to meet future community needs.



Swindon Robins fans at the Abbey - image Neil Ockwell



4. The Local Plan requirements must be considered in the context of the 2025 Abbey Stadium Planning Applications S/25/1177 & S/25/1182.

Points for the Swindon Local Plan to Oppose the Abbey Stadium Planning Application.

4.1 Loss of a Unique and Valued Community Sports Facility

- Abbey Stadium is the last remaining Speedway venue in Swindon and has been a centre for motorsport and community events for over 70 years.
- The Swindon Playing Pitch and Outdoor Sports Strategy 2025 recommends protecting Abbey Stadium for potential future Speedway or outdoor sports use, recognising its cultural and sporting significance.
- The stadium is not “surplus to requirements” as defined by the NPPF and Local Plan Policy CM4; there is no equivalent or better provision for Speedway or motorsports in Swindon or the Borough.

4.2 Failure to Meet National and Local Policy Tests for Loss of Sports Facilities

- NPPF Paragraph 104 and Local Plan Policy CM4 state that sports facilities should not be lost unless:
 - An assessment shows the facility is surplus to requirements,
 - The loss is replaced by equivalent or better provision in a suitable location,
 - Or the development is for alternative sports/recreation provision with clear benefits.
- The application does not provide a replacement Speedway facility in Swindon, and the proposed alternative at Studley Grange is outside the Borough and not yet delivered.
- The applicant’s own Statement of Community Involvement and Planning Statement acknowledge strong local opposition to the loss of the stadium and the lack of a local replacement.

4.3 Overwhelming Community Opposition

- The applicant’s own consultation (SCI, p. 25–41) shows 73% of local respondents oppose the principle of development; the most cited reason is the loss of leisure/sport/community facilities, especially Speedway.
- Many respondents referenced the NPPF and the Coventry Stadium appeal decision as reasons to retain or replace the stadium before redevelopment.
- There is a clear community preference for retaining Speedway and leisure facilities over new housing on this site.

4.4 Inadequate Consideration of Community and Sporting Needs

- The Playing Pitch and Outdoor Sports Strategy 2025 identifies Abbey Stadium as a site of “local significance” and recommends its protection for future sports use.
- The application’s alternative sports provision (cricket nets, padel courts) does not address the unique requirements or cultural value of Speedway/motorsports.
- The proposal does not demonstrate that the loss of Speedway is justified by community need or that the site is no longer required for its established use.



4.5 Premature Loss of a Strategic Asset

- The stadium could be brought back into use for Speedway, other motorsports or leisure.
- The Local Plan should retain the leisure/sports designation for Abbey Stadium and resist its loss to housing until a robust, locally accessible replacement for Speedway is operational.

4.6 Policy and Precedent

- The Coventry Stadium appeal (2024) and NPPF guidance reinforce that loss of motorsport venues should not be permitted without clear evidence of surplus, robust replacement, or overwhelming community support.
- The Local Plan should reflect this by explicitly protecting Abbey Stadium for motorsports and community leisure until such tests are met.

5. Conclusion:

The Local Plan must ensure that Abbey Stadium is protected for motorsports and community leisure use unless and until robust evidence and a suitable, operational local replacement are secured. This approach is consistent with national policy, local evidence, the Coventry Stadium Appeal Decision and the clear wishes of the Swindon community.

References:

- National Planning Policy Framework (NPPF) para. 104
- Swindon Local Plan Policy CM4
- Swindon Playing Pitch and Outdoor Sports Strategy 2025
- Abbey Stadium Planning Statement (2025)
- Statement of Community Involvement (2025)
- Coventry Stadium Appeal Decision (2024).

Swindon Needs Speedway
13 October 2025



'We Are The Champions' - League Winning Robins



1957 Robins



2017 Robins



1967 Robins



2012 Robins



2019 Robins

