



Respondent No: 372

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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 Reg 18

Symmetry Park, Swindon

DV4 Limited and P1 Property Limited
10 October 2025

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torandco.com



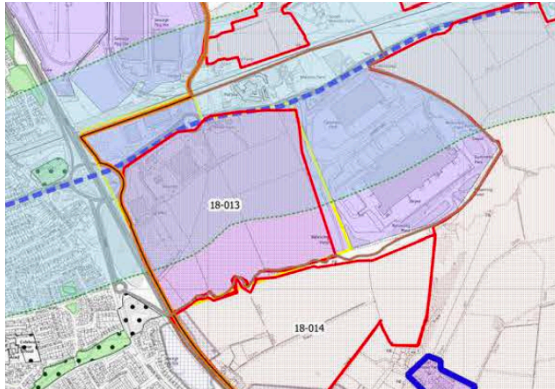
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1.0 Introduction

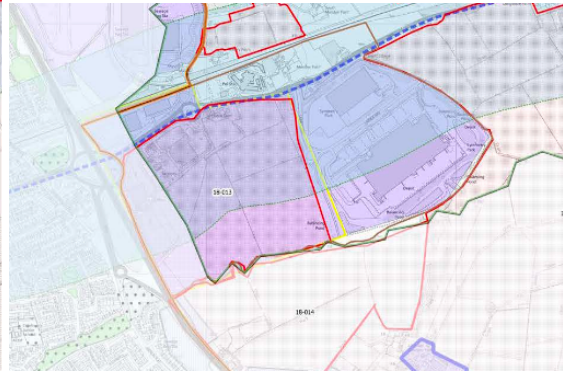
- 1.1 These submissions to the Swindon Local Plan Reg 18 consultation are made on behalf of DV4 Limited who retain interests in land at Symmetry Park and adjacent land and P1 property who have an interest in land adjacent to Symmetry Park.

2.0 Representation

Policies Map.



Policies Map



North East Inset

- 2.1 The Policies Map and North East Inset differ as the green line is the limit of the North East policy map. The insets are not referred to in policy. Maps need to be made consistent.

Allocations

- 2.2 Site 18-013 extends east up to Symmetry Park boundary and includes Plot 4 adjacent to Symmetry Park. There is no policy reference to Site Allocations or Appendix 1 to bring site allocations into policy.
- 2.3 Suggested uses for 18-013 are residential + retention of retail + transitional industrial land. It is noted the land parcel rolled over from Local Plan 2026.
- 2.4 The previous plan, Local Plan 2026, referred to the creation of a district centre as an expansion of the existing retail provision in the northwest corner of the site. It is noted Site Allocation 18-013 only now includes retention of retail, presumably seeking to retain the existing retail provision. The suggested uses should include addition retail and roadside uses.
- 2.5 The majority of Site Allocation 18-013 is within the Employment Land, Industrial Location (mixed-use transitional site) notation on the Policies Map. While there is no specific policy reference to these uses, Policy FE2: in respect Industrial Land (Scale and location) refers to uses incompatible with the suggested uses for 18-013.
- 2.6 The Strategic Growth Location, New Eastern Villages SGL 02 which includes Redlands, Lotmead, Foxbridge, Great Stall, Rowborough and expansion at South Marston is proposed to bring forward up to 10,000 homes over the Plan period. There is no reference to employment or other use.
- 2.7 The previous plan sought to provide 40 hectares of employment land to serve the NEV to provide a sustainable community. The Council are aware that this level of employment use has so far not been provided. The NEV SGL must include a range of uses including additional employment land for the NEV to be sustainable.

- 2.8 The Policies Map shows a Purple Area for Employment Land, this designation extends up to the North South Spine Road within Symmetry Park and includes land opposite across A429. There is no policy referencing “Employment Land”
- 2.9 The Policies Map shows a Green dotted line indicating a Sustainable Growth Area, this covers the top 2/3 of the Symmetry Park site and 18-013. The growth area extends as a corridor either side of the A420. There is no policy referencing “Sustainable Growth Areas”
- 2.10 The Policies Map shows a blue dashed line indicating a Sustainable Growth Corridor, this follows the A420. There is no policy referencing “Sustainable Growth Corridors”
- 2.11 Symmetry Park is designated as an [existing] Employment Land Industrial Location (purple), as a part of New Eastern Villages. The top 2/3 of the site are within Sustainable Growth Area designation.
- 2.12 Policies need to include the expansion of existing employment sites to maximise their potential to support economic growth in Swindon and contribute to the sustainable development of the new residential areas.
- 2.13 Policies need to address the specific designations on the Policy Maps to explain what is being proposed in the areas and what the designations are seeking to achieve.
- 2.14 Policies need to specifically refer to Site Allocations coming forward as part of policy. In the case of 18-013 the policy needs to include a wider mix of uses to support sustainable development of the NEV and maximise the A420 as a sustainable location for development.



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Respondent No: 373

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- Q1. Title Mr
- Q2. First Name Gary
- Q3. Last Name Llewellyn MRTPI
- Q4. Job Title (where relevant) Proprietor
- Q5. Organisation (where relevant) Town and Country Planning Services on behalf of Messrs Slattery, Gallagher and Hall

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

SUPPORT The identification of Broad Blunsdon as a location for supplementary housing growth is deemed spatially appropriate given its designation as a larger village. The identification of Site Allocation 18-030, as shown on the Policies Map and identified/described in Appendix A, is very suitable for the specified level of development given its location to the south of Highworth Road and it abutting the built-up area of Broad Blunsdon, being a logical accretive extension to the village. Given its constraints and opportunities, the site allocation can be developed either piecemeal or comprehensively.

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.

NONE



Respondent No: 374

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Q1. Title

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

SUPPORT The identification of Broad Blunsdon as a larger village confirms its status as being a location suitable for supplementary housing growth. The identification of Site Allocation 18-030, as shown on the Policies Map and listed in Appendix A, will contribute to improving and sustaining the range of services, facilities and employment opportunities in the village.

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.

NONE



Respondent No: 375

[REDACTED]

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- Q1. Title Mr
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Q12. Please set out your comments below. Please be as precise as possible.

OBJECT The annual housing supply of 1205 houses is noted, as is the intention to meet it. The policy identifies a number of circumstances where the Borough's housing requirement can be met. The list does not recognise the sites rolled forward from the current adopted Local Plan 2015 and the "call for sites" process, as published in the SHELAA (September 2025).

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.

Clause (2): the following text should be added:- "Allocating suitable sites, as shown on the Policies Map and described in Appendix 1, including those rolled forward from the 2015 Local Plan and identified in the 2025 SHELAA". Sub-clause (a) – this should refer to Policy SGL01. Sub-clause (c) - this should refer to Policy HC7. Sub-clause (d) – this should refer to the publication of an Annual Housing Monitoring Review. Sub-clause (e) – this should refer to the relevant policies in the plan e.g. HC4. Sub-clause (f) – the term "small sites" is not defined in the glossary. This relates to sites able to accommodate from 10 to 49 dwellings. Clause (5) – this should refer to Policy HC5.



Respondent No: 376

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

OBJECT The wording of Clause (1) and (2) of the policy is confusing. This means their emphasis is everywhere rather than focussed.

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.

Both Clauses (1) and (2) should be reworded as follows:- "1. Development proposals within the rural settlement boundary of villages should refer to relevant local Neighbourhood Plan policies, Design Codes, Design Guidance, and Conservation Area Appraisals, where relevant. 2. Development proposals should pay particular attention to:- • The villagescape features of the settlement, including having due regard to its built morphology, locational density variations, and the nature of the buildings contained therein to support locally distinctive design, and to accord to Policy SD3; and • The landscape setting of the settlement, including the advice in the adopted Landscape Character Assessment for the Borough, and to accord to Policy CSE7."



Respondent No: 377

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

OBJECT The policy does not refer to house type, being contrary to the advice in the NPPF. This refers to the housing needs of different groups in the community with reference to size, type and tenure (Paragraph 63). The policy refers to a plan "sub area analysis". There is no indication given as to what this term means. The situation is that small developers will seek advice from a local estate agent regarding the demand for housing in an area. This will have a direct bearing on the ability of the developer to sell the houses.

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.

The title of the policy should be changed to:- "Housing size, type and tenure". The wording of Clause 1 of the policy should be changed to:- "All major residential development is required to provide balanced mixed- communities with house sizes, types and tenures that reflect local housing need. Due regard should be given to, where appropriate, the latest Local Housing Needs Assessment and the sub area analysis to provide the most up to date evidence of housing need at the time of application. The Borough Council's Housing Department will be consulted as part of the application process".



Respondent No: 378

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Q1. Title

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

OBJECT The policy needs an introductory paragraph that recognises the advice in the NPPF in relation to the contributions expected from a development proposal (Paragraph 35), and the 3 tests that must be met when a planning obligation is sought (Paragraph 58) from a development proposal.

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.

The following text should be added to the beginning of the policy and before Section 1:- "The Borough Council will seek a planning obligation from a proposed development where it accords with the advice in the NPPF. The provision of a financial contribution towards identified off-site mitigation infrastructure measures will be ringfenced for its intended purpose and identified location within the Borough of Swindon". Clause 2, sub-clause (i) refers to unlocking "good growth". This should be reworded to refer to "...unlocking growth that is positive in all respects". Clause 2 refers to certain land uses being prioritised i.e. health, education and leisure. These consider their future needs and wants from a strategic and operational viewpoint. Both Sub-clauses (ii) and (iii) should be reworded to say...." where there is an identified strategic and operational need". Clause 3 – the Borough Council's planning page on its website should confirm the amount of the monitoring fee so that Applicants can budget for all costs associated with the legal agreement. It should also confirm that the monitoring fee is index linked and must be paid upon the signing of the legal agreement. Clause 4 – this should be added to the end of Clause 2. Both clauses complement each other. Clause 5 – the need for a viability review mechanism should be identified in the s106 agreement. Such information is commercially sensitive and so this needs to be recognised. Clause 6 – the last sentence should be omitted and added to Clause 3 to read "...to form part of that legal agreement, and be paid by the Applicant upon its signing and dating."



Respondent No: 379

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Q1. Title not answered

Q2. First Name John

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Q5. Organisation (where relevant) not answered

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

HC5 on page 56) says that: New houses in Multiple Occupation (HMOs) will only be supported where they: a) meet an identified need, b) do not undermine the provision of self-contained housing, c) do not result in the loss of character or amenity to the area as a consequence of increased traffic, noise or general disturbance, d) are located in an area of high transport accessibility, and e) comply with relevant standards and design requirements set out in Policy SD3. The problem with this policy is that it is no different from the current approach that is put forward as a means of controlling the proliferation of HMO, but does no such thing. The economics of owning a HMO are such that, once occupied, they are extremely profitable to own – far more so than renting a house to a family. This is why, as you walk around the central area of Swindon, you will see houses being converted to HMOs everywhere. There are local firms of builders who do nothing but subdivide existing family homes into separate rooms. There is a whole industry of investors looking to invest money into the Swindon HMO market because it is so profitable. Unless something is done to control this spread of HMOs there is no reason at all, under current policy, to ever think that this situation will change. Every new HMO is a loss of a family home, and brings with it transitory residents with little commitment to the wider community, and often anti-social behaviours. HMOs hollow out the fabric of existing communities. It need not be like this as councils have the powers to effectively control them but Swindon has chosen not to use them. Instead it has adopted “guidelines” like the above a) – e), and then added further caveats that enable developers to continue these conversions unchecked – such as in the existing Local Plan where section 4.144 states that “For guidance a reasonable threshold is that the number of Houses in Multiple Occupation should not exceed 20% of the total number of properties within a 100 metre diameter buffer of the application property”. As an example, Curtis Street has 100 houses, and now 20 of them have been converted to HMOs – the latest has even submitted a planning application (since it exceeds the permitted development rights of 6 rooms) after the work has largely been completed. The situation is clearly out of control. Recently, for example, the following councils have decided to require planning permission for any conversion to a HMO regardless of its size (an Article 4 Direction): Tameside in Greater Manchester; Sefton in Merseyside; Chorley in Lancashire. There is no reason why Swindon should not do the same if it is truly desired to control the incessant spread of HMOs. In another example, the Southend Local Plan proposes that a HMO application would be considered “harmful” if there is a concentration of more than 10% HMOs within a 50 metre radius. It would also prevent any existing homes from being sandwiched between two HMOs, and an application would be refused if it results in a continuous frontage of 3 or more HMOs (as has now happened in Curtis Street in Swindon town centre). If Swindon wants a balanced approach to HMOs and family housing it needs to adopt some of these ideas from around the country. As it says in section 6.15 on page 64 “a stricter approach on sub-division is needed to alleviate some of the cumulative impacts”.

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.

HC5: Houses in Multiple Occupation and Sub-Division (page 56) This policy should have a new item 3 added: 3. In order to better control the unregulated spread of HMOs in the Central area, and limit the loss of family housing, Swindon Council will adopt powers to require planning permission for any conversion to a HMO regardless of its size (an Article 4 Direction). In addition, the Council will reduce the current guidance which states that a “reasonable threshold” for the number of Houses in Multiple Occupation should not exceed 20% of the total number of properties within a 100 metre diameter buffer of the application property, down to being not more than 10% HMOs within a 50 metre radius.



Respondent No: 380

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- Q1. Title Mr
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- Q4. Job Title (where relevant) not answered
- Q5. Organisation (where relevant) not answered

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

The plan for the Central area has an ambition for 8000 new homes and 6000 jobs, with sites for 4,347 homes already identified (Point 1, page 29). Tall buildings will be supported (Point5, page30). SP1 on Page 37 2a) requires “developments to preserve or enhance Swindon’s heritage assets (where applicable) and be designed in a sympathetic manner to their surrounding character; also on page 39 it says that developments should:” be sympathetic to the existing townscape, local character and history of the area including the surrounding built environment”. Policy SD5 on pages 41 requires tall buildings to “create comfortable and attractive public realm surroundings, protect important views, and avoid dominant overshadowing of public spaces, or creation of ‘tunnels’ and negative microclimatic effects; h. Provide access to outdoor space as part of the development in the form of balcony’s, pocket parks and other public space provision”. The Plan’s policy of encouraging the development of tall buildings is totally out of character with the low level nature of the housing in the Central area, with a large proportion being Victorian terraced housing and blocks that are lower than 6 storeys. We all know of the plans by the private developers, F1 Real Estate Management, to build speculative “ twin towers” of circa 20+ storeys (with 300 flats) on part of the Brunel centre site, and for similar to be built on the Wharf Green tented market. The ambition seems to be to turn central Swindon into something like downtown Croydon, with skyscrapers full of 1-2 bed flats, as a quick solution to hitting housing targets. Anyone familiar with such private developments will know that they come with high annual ground rents and ever-increasing unregulated service charges, which make them very expensive to occupy (never mind their high purchase or rental price). That’s what is coming to Swindon, and it should not be endorsed. Such tall buildings have flats built to national

standards with an average small size of 40-50 square metres and very little storage – not much bigger than a decent hotel room – all designed to maximise the buildings occupancy density so as to maximise the developer's profits. The Council requires in Policy SD3 page 39 that such developments "include access to private external space that equates to 10m2 min per apartment or 5m2 min per apartment within the Town Centre. This may be provided as either private balcony space, by shared amenity gardens or a combination". So although the Council knows that people need 10m2 it is prepared to allow developers to provide half that amount for those unfortunate enough to have to live in these tall buildings, and it thinks that a balcony on Floor 20+ is appropriate. Swindon deserves much better than this policy. Swindon may well need 8000 new homes in the Central area but what it really needs is human scale houses, not skyscrapers that will become slums-in-the-sky. The David Murray John (DMJ) Tower is 50 years old and is already in need of significant redevelopment – these new towers will be no different – whereas the Victorian housing is 135+ years old, still useable and in demand. Anyone with any knowledge of the DMJ knows that the whole area is notorious for its high winds, and has long been the subject of complaint by its residents and people walking near it, so stating that such developments must not create 'tunnels' and negative microclimatic effects" is simply to deny the reality of what will happen if they are built. The Council also demands that residential planning developments (see SD7 page 43 1b) must not be "overbearing or of a form which would be detrimental to the amenity of nearby residents by virtue of loss of outlook, daylight, sunlight and / or privacy", yet that is exactly what three 20+ storey towers will be in its impact on residents forced to live in their shadow. The same "overbearing" rule should apply to the development of tall buildings in the central area, and should rule them out. F1 Estates is looking out for the commercial interests of its shareholders, and does not care if its proposals wreck the character of central Swindon – but our Council should, and ought not to permit the building of such monstrous tall blocks of flats. It is, however, obvious to any reader of the Local Plan that the Council, sadly, is committed to tall buildings in the central area, despite the many provisions in the Plan that ought to prevent them from ever being built, and regardless of any opposing consultation feedback that may be given from respondents. Because of this, the changes proposed below are limited to requesting that the Council reviews again whether its policy of encouraging the development of tall buildings is appropriate for Central Swindon, and to explicitly requesting that any Heating, Ventilation and Air Conditioning (HVAC) systems are tightly controlled as to the noise pollution that they pump out over the surrounding residential areas. Developers and Planners seem to think that if they put such plant on the top of these tall buildings (or worse, half-way up the building as at the DMJ Tower), it will go unnoticed. Of course the plant and a/c fan noise spreads widely over the surrounding central Swindon area and, especially at night time, disturbs the sleep of local residents. The level of airborne equipment noise at night in central Swindon is already unacceptably high. The CSE 12 Policy on page 105 should be rigorously enforced during any planning stages, with such HVAC equipment pointing away/ shielded from any nearby residential parts of central Swindon (and preferably be excluded from such developments altogether due to their insidious impact on the quality of the lives of nearby residents): CSE12: Reducing Noise and Pollution

1. All proposals for development must: a) minimise nuisance resulting from development; b) manage and mitigate the impacts of any nuisance generated through the operation of the development (such as noise, vibrations, odour, fumes and dust pollution) on people and the built and natural environment over the life of the development; and c) ensure noise-sensitive and air quality-sensitive development is directed to appropriate locations, and that they are protected against any existing and proposed sources of noise and air pollution through careful design, layout and use of materials and adequate insulation. Finally, it has in the past been suggested that Swindon needs "iconic" skyscrapers. If the DMJ is already an "iconic" representation of Swindon, how does surrounding it with three more such buildings make it then anything other than "just another tower block" ? Would Paris build three more Eiffel Towers around the present one, and expect them to improve the image of the city? Of course not. Why then does the Council think that allowing such tall developments in Swindon will improve the town? One such "icon" is quite sufficient.

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.

Policy SGL 01 - Swindon's Central Area 5. Tall buildings will be supported within the Central Area provided they meet the design quality and safety requirements set out in Policy SD5. Revise this to read: The Council believes that tall buildings have a role to play in the future development of central Swindon. It recognises, however that some local residents do not share that belief, due to the overbearing nature of such buildings and their impact on existing residents. It notes especially that 24-hour a day noise pollution from the air-conditioning and other plant on such buildings needs to be rigorously controlled and shielded from surrounding residents. The Council will review this policy again and hold a much wider consultation, specifically on this issue of tall buildings, with local people before any commitments are made in the Local Plan to encourage/permit such developments.



Respondent No: 381

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- Q1. Title Mr
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[REDACTED]

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

I have read this entire chapter, with all its policies, and can find no mention anywhere of any desire to reshape the current road traffic flows in the Central Area. This is a huge disappointment and a missed opportunity. If the plan is to add 8000 homes and 6000 new jobs into the Central area then that will add massively to the traffic using the Central area, to the detriment of local people who daily suffer from congestion on these roads, noise and fume pollution. There are two areas particularly badly impacted at present: Crombey Street/Curtis Street and Kingshill Road. The vast majority of this traffic is passing through these residential areas heading for West Swindon. There should be no need for this traffic to be transiting through these central areas. The T junction at Crombey Street and Curtis Street, must already be the busiest junction in Wiltshire as the daytime traffic is non-stop at this point. Previous plans to introduce traffic calming measures at this junction (to eliminate the collisions of cars into the houses) have all disappeared. Carbon from car exhausts can literally be swept off the bays of these houses as the pollution is that bad. Over the years some redesign options have been floated: i) Returning Commercial Road to two way traffic, routing traffic onto Farringdon Road towards West Swindon. ii) Insisting that traffic uses Princes Street as a route towards West Swindon. It is for the Planning Department to come up with feasible options, but pushing ever more traffic into these central residential areas should no longer be considered acceptable. It is time for these residential areas to be returned to their residents to make them pleasant places to live, without thousands of vehicles each day passing through, en-route to elsewhere.

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.

ST1: Promoting Sustainable Transport (page 78) Since there is no policy proposal covering the re-routing of transiting traffic away from the Central Area I have added a new point 7 onto ST1: 7. To further mitigate the negative of impacts of traffic, which is especially bad already in the Central Area, due to its sheer volume and the fact that much of it is transiting through to West Swindon, the Council commits to studying if alternative routes can be found which will direct such traffic away from these residential areas so that they can be returned back into pleasant places for their residents to live. Kingshill and Crombey Street/Curtis Street are especially affected at present and need relief from this pressure, before thousands of new homes/jobs are added into the area with their inevitable further increase in traffic volumes.



Respondent No: 382

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name John

Q3. Last Name Brennan

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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

FE6: Evening, Night-time and Cultural Economy 3. New evening and night-time economy uses must be neighbourly, having regard to the character of the centre where they are proposed. This proposal needs to be expanded to deal with the fact that some venues have not behaved in a “neighbourly” manner. It should apply to ALL venues and not just NEW ones, in order to protect local residents from disturbance. Venues operate within a license given by the Licenses department. Some of these licenses were granted a very long time ago in an age when powerful music sound systems did not exist. So, for example, where a long-standing license has been granted until 3am on a weekday, it could never have been envisaged that this would be abused by playing pounding drum and bass music at top volume at the premises, despite it being now surrounded by residential homes. Efforts to request the venue to be “neighbourly” and operate at less volume and end earlier were met with total disregard, because they are operating “within their license” (or worse, within a “Temporary Entertainment Notice”, which seem to be beyond all rules or boundaries). The Licensing team then require that the resident proves that a “statutory nuisance” has occurred before it will take any real enforcement action. The onus falls on the victim to prove his case, rather than the offender to be dealt with proactively by the Council and stop the offense (as most residents would expect). It is almost impossible for a resident to challenge an existing premises license. So proposals that require venues to behave in a “neighbourly” way are useless without some means of the Council proactively enforcing it within the law – which it does not at present. It is fine to say, in FE6 Point 5, that new housing developments will be resisted if they threaten the license of an existing night-time establishment’s continued use, but the flip side must also be true. Where an existing license is no longer appropriate because homes that are already built are badly affected by the non-neighbourly behaviour of a night-time venue then that too should be resisted and the license be proactively reviewed. There can be no justification for keeping neighbourhoods awake until 3am on a weekday morning, as has happened. The Council should amend this proposal to a) actively review all existing premises licensing hours where it has received complaints, and b) pro-actively warn premises that their license will be reviewed if “neighbourly” behaviour does not occur. The threat of a license review should be sufficient for any venue to amend its behaviour and operate with consideration for local residents.

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.

FE6: Evening, Night-time and Cultural Economy 3. New evening and night-time economy uses must be neighbourly, having regard to the character of the centre where they are proposed. Amend to read: 3. All evening and night-time economy uses must be neighbourly, having regard to the character of the centre where they take place. If this does not happen then, in response to complaints from local residents, the Council will pro-actively seek to review the premise license to enforce neighbourly good behaviour from the premises. The Licensing team will also review the operating hours of existing licenses where it is known that noise problems have occurred in the past, in order to assess if the license conditions are still appropriate for the housing conditions that now exist around a venue. Licensed venues should close at a reasonable hour which does not affect the sleep of established local residents.



Respondent No: 383

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title

Mrs

Q2. First Name

Charlotte

Q3. Last Name

Hutchison

Q4. Job Title (where relevant)

Associate Partner - Planning & Development

Q5. Organisation (where relevant)

Carter Jonas on behalf of Shaviram Astaris Limited

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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

SBC admin note: Please also see attached response. These representations are submitted on behalf of Shaviram Astaris Limited, the owner of the existing residential building known as North Star House and its surrounding land. Based on the draft Policy Map, the Site would be designated within the Central Area Strategic Growth Location and allocated for development under site allocation 18-002 'Land to the north of the Station'. The identification of the Site within the Central Area is supported as a key area for regeneration in line with the Council's aspirations. Our client's land has the ability to successfully contribute to transforming Swindon into a bustling and thriving mixed-use urban heart. We support Policy SS1 that seeks to deliver housing in the 'Central Area' Strategic Growth Location first. The specifics of the site allocation are discussed below.

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.

As currently drawn, the Site is allocated for development alongside land to the east known as Polaris House under allocation '18-002 Land to the north of the Station'. We do not agree that the two sites should be conjoined within the same allocation and request separation into two site allocations to enable standalone developments to come forward.



Respondent No: 384

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title

Mrs

Q2. First Name

Charlotte

Q3. Last Name

Hutchison

Q4. Job Title (where relevant)

not answered

Q5. Organisation (where relevant)

Carter Jonas on behalf of Shaviram Astaris Limited

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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

SBC admin note: Please also see attached response. We are in support of Policy SD5 – Tall Buildings which acknowledges the contribution that well-designed tall buildings can make in urban areas whilst providing a framework within which designers can develop proposals. The outlined Policy objectives are welcomed for their flexible approach to building storeys which must make a positive contribution to the skyline of Swindon. Ensuring that the maximum height of a new development is decided on a case-by-case basis will promote positive development diversity and encourage mixed tenure housing to Swindon, especially its regenerating town centre. Our client's Site could accommodate tall buildings to provide a new residential-led mixed use area that can compliment the Council's own aspirations regarding the redevelopment of the Railway Quarter. This would positively assist the town centre's wayfinding and creating a memorable skyline that supports the direction for active travel.

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.

No changes required.



Respondent No: 385

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title

Mrs

Q2. First Name

Charlotte

Q3. Last Name

Hutchison

Q4. Job Title (where relevant)

not answered

Q5. Organisation (where relevant)

Carter Jonas on behalf of Shaviram Astaris Limited

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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

SBC admin note: Please also see attached response. We agree that new major residential development should provide balanced mixed communities with tenures and house sizes that reflect local housing need. However, it should be acknowledged that town centre developments may not be capable of delivering the desired varied mix of tenures and house sizes due to viability and physical design restrictions. On a more general basis, housing on town centre sites is more suitable for smaller households - single professionals, couples without children, key workers, graduates, and downsizers—who value walkability and rapid rail access. Meeting small household demand in the town centre reduces competition for 3 and 4 bed houses on the suburbs of Swindon, helping to free up larger family homes in suburban areas better suited to schools, gardens, and car parking. Sustainable, brownfield sites must be approached with pragmatism and viability consideration throughout the planning process.

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.

We suggest that there should be an acknowledgment within Policy HC1 (Housing Tenure and Sizes) that town centre development tenure and housing mixes should be approached case by case, based on market guidance with the Local Plan adopting leniency and factoring consideration towards Swindon's housing supply needs.



Respondent No: 386

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title

Mrs

Q2. First Name

Charlotte

Q3. Last Name

Hutchison

Q4. Job Title (where relevant)

not answered

Q5. Organisation (where relevant)

Carter Jonas on behalf of Shaviram Astaris Limited

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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

SBC admin note: Please also see attached response. Policy HC2 (Affordable Housing) lacks consistency with Policy D1 (Developer Contributions and Viability in regard to viability testing of housing development schemes. Policy HC2 should introduce wording that acknowledges the viability issues presented on certain sites. At present it does not provide an opportunity for viability testing in delivering some affordable housing where 30% cannot be reached in line with national planning policy.

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.

Paragraph 1 should be amended to state: All major residential development will be expected to maximise affordable housing delivery and provide, as a minimum, 30% affordable homes, of which there is a local need for 78% to be social rent [subject to viability].



Respondent No: 387

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title

Mrs

Q2. First Name

Charlotte

Q3. Last Name

Hutchison

Q4. Job Title (where relevant)

not answered

Q5. Organisation (where relevant)

Carter Jonas on behalf of Shaviram Astaris Limited

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

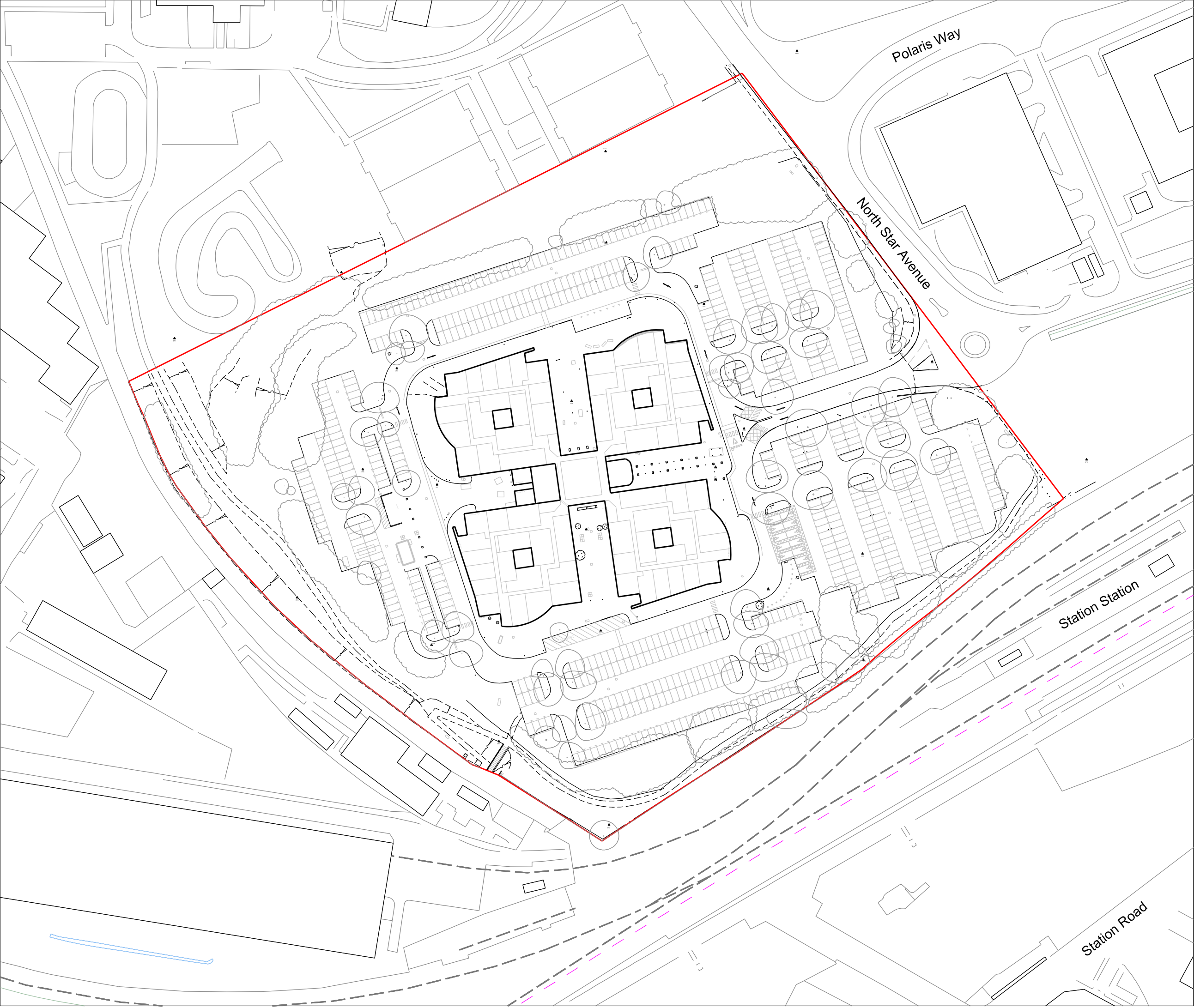
[REDACTED]

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

SBC admin note: Please also see attached response. Paragraph 2 of Policy ST5 states that new residential development in the Town Centre is encouraged to be car free. Paragraph 1 states that all developments should have regard to the Swindon's Technical Guidance for Parking for New Developments (2021) or updated equivalent. At present, the Site is located within Sector 3 of the Technical Guidance for Parking that requires 1 car parking space per 1 bedroom and 2 spaces per 2-3 bedrooms, but in the new Local Plan would be located within the town centre area where the aspiration is for car free on developments in this area. There are a number of large scale proposed allocations to the immediate north of the railway station that are highly sustainable and can accommodate less car parking than sites in the outer areas of Swindon due to their proximity to amenities in the town centre and access to the major railway station. Perhaps from a historic perspective, the standards have been developed in line with the growth of the town centre southwards of the railway station. The new Local Plan would ensure that the railway station would become a central point of the town and therefore sites to the north would become acknowledged for their same sustainability credentials. The policy would therefore be at odds with the Technical Guidance on parking due to the higher level of car parking required within Sector 3.

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.

The Technical Guidance on Parking should be updated at the same time as the New Local Plan is adopted to reflect the inclusion of the sites to the north of the railway line that would also be located within the town centre boundary and can therefore comfortably deliver car free developments as a result of the proximity to the railway station and town centre.



Stefan Shaw Studio

Project
North Star Park

Drawing Title
Existing Site Plan

Drawing Number
0103_0000

Rev	Date
	29.09.25

Status
INFO

Scale at A3
1:1250

0 50m

Client
THE SHAVIRAM GROUP

Notes

North Star Park Site Boundary

No implied licence exists. This drawing should not be used to calculate areas for the purposes of valuation. Do not scale this drawing. All dimensions to be checked on site by the contractor and such dimensions to be their responsibility. All work must comply with relevant British Standards and Building Regulations requirements. Drawing errors and omissions to be reported to the architect.



Respondent No: 388

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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

SBC admin note: 'transcribed from scanned submission' Building a new surgery for the area integrating all discipline including a pharmacy. The houses are set to increase the population by up to half as much again. The current medical facilities are not enough so how can the houses be built first.

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: 'transcribed from scanned submission' The Infrastructure for a medical tab for the New housing should be put in before houses are completed. At present Wichelstowe does not have a medical hub 15 year after it building



Respondent No: 389

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title

Mrs

Q2. First Name

Dorie

Q3. Last Name

Groves

Q4. Job Title (where relevant)

not answered

Q5. Organisation (where relevant)

not answered

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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

SBC admin note: 'transcribed from scanned submission' The senior school and Sixth form college are full, as are the Junior School

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: 'transcribed from scanned submission' The Infrastructure needs to be in place before people move in so they cannot be accommodated in the area



Respondent No: 390

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title

Mrs

Q2. First Name

Dorie

Q3. Last Name

Groves

Q4. Job Title (where relevant)

not answered

Q5. Organisation (where relevant)

not answered

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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

SBC admin note: 'transcribed from scanned submission' The provision of crossing Swindon Rd a second access to the new houses these are not covered.

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: 'transcribed from scanned submission' Unless there is safe Road provision in place. Before these houses are occupied there will be issues to be addressed.



Respondent No: 391

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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

SBC admin note: 'transcribed from scanned submission' Unless Thames Water is involved in the planning before the houses are built - Re flood planning - sewerage disposal the results could be dangerous.

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: 'transcribed from scanned submission' Please sort out the part of the infrastructure planning process prior to starting build



Respondent No: 392

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title

Mr

Q2. First Name

Adrian

Q3. Last Name

Crafer

Q4. Job Title (where relevant)

not answered

Q5. Organisation (where relevant)

not answered

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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

SBC admin note: Please see attached responses. 3b is inconsistent with other paragraphs covering the same matter

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.

3 B The Hawkesworth Depot, Swindon Sidings Keypoint Rail Freight Terminal



79m50c
MOREDON BRIDGE

Notes / Legend:

NOTES

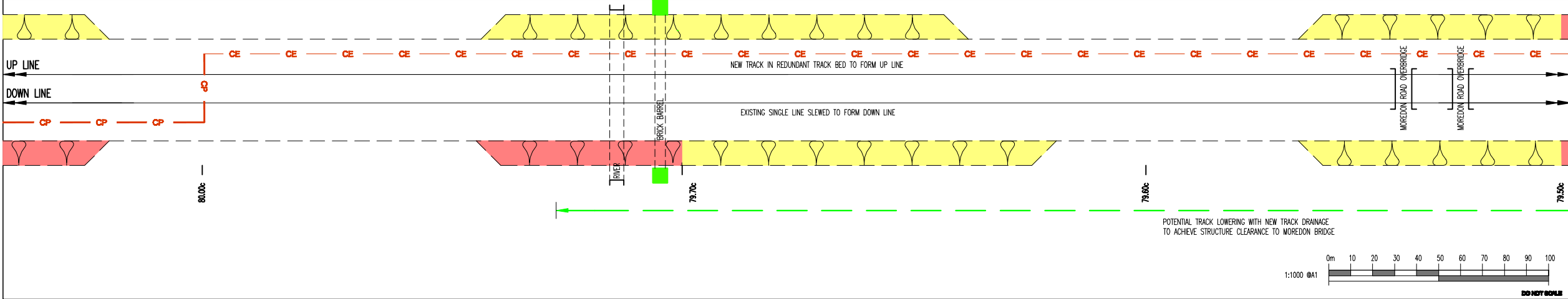
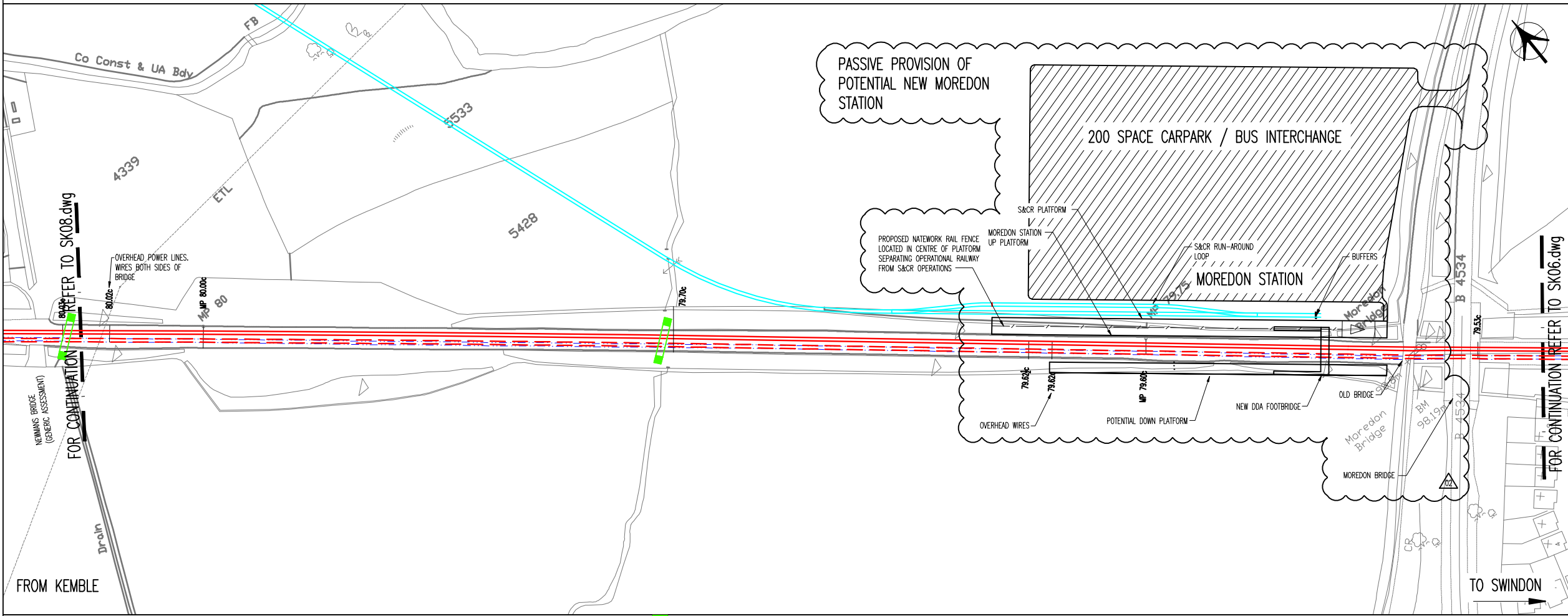
1. REPRODUCED FROM THE ORDINANCE SURVEY MAP WITH PERMISSION OF THE CONTROLLER OF HER MAJESTY'S STATIONERY OFFICE. CROWN COPYRIGHT. LICENCE No: 0100040692. ALL EXISTING FEATURES ARE INDICATIVE.
2. INFORMATION DERIVED FROM TRACK WALKS CONDUCTED ON 19-12-06 AND 20-12-06
3. LINE SPEED TO REMAIN AS EXISTING UNLESS SPECIFIED OTHERWISE.
4. FOR SIGNAL SCOPE OF WORKS REFER TO SIGNAL SCHEME SKETCHES.

LEGEND

- PROPOSED NEW TRACK
SLEW TRACK NEW POSITION
SLEWED TRACK OLD POSITION
TRACK TO BE RETAINED
SWINDON TO CRICKLADE RAILWAY
PROPOSED NEW TRACK DRAINAGE
POTENTIAL FENCING BOUNDARY ISSUES
EXISTING CABLE ROUTE
PROPOSED CABLE ROUTE
CULVERTS
UNDERBRIDGE (U/B)
OVERBRIDGE (O/B)
LEVEL / FOOTPATH / USER WORKS CROSSING

ASSESSMENT OF EARTHWORKS CONDITION

- POOR
MARGINAL
SERVICEABLE
PROPOSED CARPARK

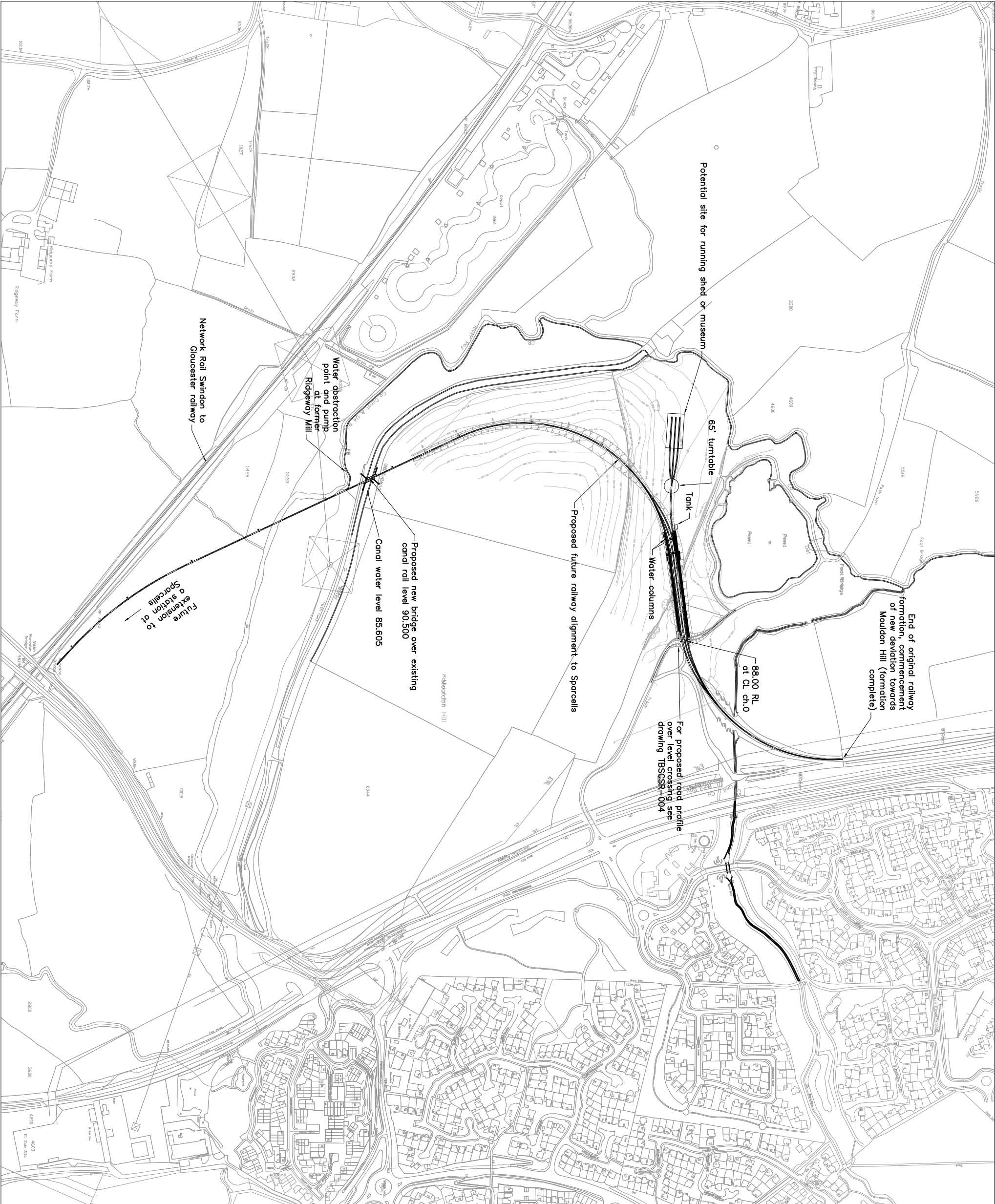


02	-	DETAILS OF MOREDON STATION ADDED	-	-	-
01	25.07.07	SECOND ISSUE	MD	CD	CD
0	08.05.07	FIRST ISSUE	MD	CD	CD

Rev.	Date	Description of Revision	Drawn	Checked	Appr.
INFORMATION					
1 Broadfield Street Barnet, London The M25 9NN 194G					
Project Title SWINDON - KEMBLE PROPOSED RE-DOUBLING					
Drawing Title INTER-DISCIPLINARY SCOPE AND GENERAL ARRANGEMENT PLAN SHEET 7 OF 36					
Designed	MD	Checked	CD		
Approved	CD	Drawn	-		
Scale	1:1000 @A1	1:2000 @A3	Date	SEPTEMBER 07	
Drawn	103028 / SK07				Revision 02

NOTES

1 The change for the new railway formation through Mouldon Hill station area starts at 0+0 at the level crossing east of the station, with change ascending west and southwards.



Revision	By	Checked/Approved	Date	Description
K	AS	-	16.10.10	Running shed, signal box, east end points
J	AS	-	03.10.10	Turntable added
H	AS	-	09.04.10	Road over new crossing added
G	AS	-	04.04.10	Sparcells alignment confirmed
F	AS	-	17.08.07	Drawing entries related to show NE connection
E	AS	-	04.02.07	End of line assigned and truncated
D	AS	-	04.02.07	Building and coating facilities added
C	AS	-	22.10.07	Minor amendments
B	AS	-	17.10.07	Alignment west of Mouldon Hill modified
A	-	-	-	-

Client
SWINDON AND CRICKLADE RAILWAY

Project
CRICKLADE COUNTRY WAY SWINDON AND CRICKLADE RAILWAY

Malcrow

Project
CRICKLADE COUNTRY WAY SWINDON AND CRICKLADE RAILWAY

Drawing
MOULDON HILL OUTLINE PLAN

Drawn by JCS Date 13/10/10
Checked by Date
Authorised by Date

Drawing No. **TBSCSR-001** Revision **K**

Drawing Scale: 1:2500 at A1
CAD Filename: TBSCSR-001 Plot Scale: 1:1



Respondent No: 393

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Adrian

Q3. Last Name Crafer

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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

SBC admin note: Please see attached responses. Paragraph 3 omits the Moredon/Sparcells Railway Station. I also understand that it is also the intention of the Swindon and Cricklade Railway to have a connection with the main line there to allow trains to run on and off their railway. Network Rail design plan for the Station is enclosed.

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.

Add to paragraph 3 c. Moredon / Sparcells / North Swindon Parkway Station



Respondent No: 394

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Adrian

Q3. Last Name Crafer

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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

SBC admin note: Please see attached response. Paragraph 4 talks about the East West rail corridor in the main. Swindon once had a North South railway line in the form of the Midland and South Western Junction Railway. It provided connectivity between Southampton and Cheltenham and hence on to the Midlands and further north. This line should be reinstated as part of a national initiative to close the North South Divide. However as part of improving local services, the Borough should be supporting the Swindon and Cricklade Railway connect with the Swindon to Gloucester Main Line, and via a deviation around Cricklade to at least the outskirts of Cirencester. It has to be remembered that that part of South Gloucestershire is designated as a 'New Town' though not yet authorised. Such a railway link would significantly reduce road traffic coming into Swindon. Similarly part of the MSWJR going south is also owned by Swindon Borough this gives the opportunity to construct a Hybrid Tram/Railway to at least Marlborough. The reason for a Hybrid system is to allow the Line to be extended to Luggershall which would allow for other rail freight options as well as passenger trains working from Andover etc.

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.

Add to Paragraph 4 iv. Extension of the Swindon & Cricklade Railway to a new station at Moredon/Sparcells to connect with Swindon to Gloucester Mainline V. Extension of the Swindon & Cricklade Railway to at least Cirencester vi. The construction of a Hybrid Tram/Railway to Marlborough and on to Luggershall with a branch serving the Great Western Hospital.



Respondent No: 395

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Q1. Title not answered

Q2. First Name Adrian

Q3. Last Name Crafer

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

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

SBC admin note: Please see attached responses. Paragraph c as it stands negates in many cases the possibility of rail freight traffic where it might interfere with a Bus route. I would like to think this is a typographical error. Passenger Railway Stations historically have had facilities to enable the loading of certain types of freight from the passenger platform, so the two are not necessarily in conflict. Note also it is railway sidings. In a number of cases the word rail has been used in the document when the word railway should have been used. Railway refers to the infrastructure, rail on its own tends to refer to the activity

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.

c. Avoid the development of railway sidings where these may impact on future operational railway requirements such as a passenger station except where they may be combined, to be read in conjunction with Policy ST2



Respondent No: 396

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Q1. Title not answered

Q2. First Name Adrian

Q3. Last Name Crafer

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

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

SBC admin note: Please see attached responses. It is my understanding that the Swindon and Cricklade Railway wish to have a mainline connection which at a proposed Sparcells/Moredon Station a Halcrow drawing for your guidance is enclosed

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.

Para 3 A deviation route for the Swindon and Cricklade Railway will be safeguarded from its present terminus at Taw Hill Halt south to a new station in the Mouldon Hill Country Park and on towards a connection with the Swindon to Gloucester Mainline, as shown on the Policies Map.



Respondent No: 397

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Q1. Title not answered

Q2. First Name Adrian

Q3. Last Name Crafer

Q4. Job Title (where relevant) not answered

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

SBC admin note: Please see attached response. For consistency with my previous comments on the Swindon & Cricklade Railway link to the Gloucester Line this paragraph needs amending

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.

5.15 The Swindon and Cricklade Railway currently operates a heritage railway from Blunsdon Station north to Hayes Knoll in Wiltshire and south to a temporary terminus at Taw Hill Halt. Heritage railways provide a valuable historic resource, generate tourism and have the potential to provide a more sustainable means of transport than the private motor car. The section between Taw Hill Halt and the proposed station at Mouldon Hill incorporates an embankment bespoke built along a deviation from the historic route of the line, built by the developers of the Northern Development Area through legal agreement. A proposed link with the Swindon to Gloucester main line would allow rail traffic to travel on to Swindon Station in the centre of town, providing sustainable transport.



Respondent No: 398

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Q1. Title not answered

Q2. First Name Adrian

Q3. Last Name Crafer

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

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

SBC admin note: Please see attached responses. The document seems to think that the only option other than heavy rail is a Bus. The experience of most Towns where trams have been implemented is that they are successful. They are definitely sustainable. They by their very nature are a form of bus lane but provide a better service and can be driven on provided you do not obstruct the trams.

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.

1.c. develop a strategy for Trams, prior to the implementation of such a strategy, bus lane infrastructure, bus gates and traffic signal prioritisation will be a stop gap measure. 2.b Improved Tram and Bus integration with Swindon Railway Station and any new railway stations to maximise public transport integration.



Respondent No: 399

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Q1. Title not answered

Q2. First Name Adrian

Q3. Last Name Crafer

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

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

SBC admin note: Please see attached responses. Particularly in the Eastern Villages the developers could reduce the land allocated to SUDs by the construction the part of the Wilts and Berks canal that passes through their development. Though there are inconsistencies in the way that a SUDs is managed, and a canal is managed, there should be a way that an exemption could granted to cover this. This would have a benefit to the developers in that they could provide more houses, and canal front properties could be sold at a premium. The various developers of the eastern villages should be encouraged to work together to achieve the construction of the canal as a unified SUDs solution.

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.

9.32 Land used for SUDs, particularly with a flood water capture function, will not be included within calculation for open space developer contribution. Where the construction of the Wilts and Berks Canal is used to provide a SUDs function, that land including the Tow Path and hedges shall form part of the open space calculation.



Respondent No: 400

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Q1. Title not answered

Q2. First Name Adrian

Q3. Last Name Crafer

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

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

SBC admin note: Please see attached responses. 18-001 Though building houses on the Former Clares Site makes some sense. The building around the Oasis on the other hand does not. The loss of a recreational facility that Swindon desperately needs is nonsensical. This was demonstrated by the level of opposition at a planning meeting and also the technical problems including the level traffic residential would generate. 18-003 According to information published elsewhere the scheme is to move the main entrance of the Station to the North of the existing Station. This goes contrary to the rest of the Local Plan through out it talks of the need to improve connectivity with the Station and encourage the use of rail. This proposal does the exact opposite. If the car park is on the north side of the station access will be via Great Western Way. Adding rush hour station traffic to a road that is already clogged most of the day has no logic. People will decide to drive rather than queue for an hour to get into the car park. The site is made up ground, some only in the 1970s and will be contaminated. It is behind a wall that has Listed status. There is a subway through the site which should be brought back into use to help access north of the station to a fully refurbished Oasis. In order to accommodate the re-routed traffic it will be necessary to widen Corporation Street, remodel the Station Road – Corporation Street junction and the little job of lowering the road under White House bridges to accommodate buses and other vehicles requiring access to the station. Yes air conditioned single decker buses cannot get under that bridge. With the current road layouts in Swindon a majority of people have to approach the station from the south, so the level of increased traffic on Great Western Way will make it impossible. 18-008 Regents Place and Princes Street Car Park. The Wyvern when built was part of a Social Hub, it was due to have three theatres, the Wyvern was built but the larger concert hall, the small theatre, Library and Museum were never built. The reason the existing theatre has some structural problems is because columns that should have been inside have had to serve as exterior columns a job they were not designed for. The proposed plan is to build a new theatre roughly in the Carfax area along with a new museum. When it comes to planning the granting of permission for a theatre would be problematic even though it is promoted by the Council the reason for this is that if the theatre is to attract the acts it needs to, apart from the noises coming from the theatre itself, plus crowds, it has to be remembered that when a show finishes at 10pm or later, the stage will be struck everything loaded into a fleet of lorries and driven off with possibly another show arriving in the early morning. All this near a residential area. This cannot be dealt with by planning conditions as that would just mean the theatre would not attract the acts it needs to make it viable. The original site in Princes Street was originally away from residential properties. Not strictly true now due to offices converted into flats. The best answer remains build the theatre where it was supposed to be in Princes Street. Put the proposed museum in the former Morrisons building and allocate all the land around Carfax street and the former bus station to housing it would have a greater yield.

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.

Appendix 1 Delete Allocation 18-001 s0099c North Star (Oasis Leisure Centre) Delete Allocation 18-003 s0433 Swindon Station Redevelopment Delete Allocation 18-008 s0519 Regents Place and Princes Street Car Park make new allocation bounded by Manchester Road – Milford Street – Fleming Way (Bus Boulevard) – Corporation Street



Respondent No: 401

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- Q1. Title

Mr
- Q2. First Name

Alex
- Q3. Last Name

Hawtin
- Q4. Job Title (where relevant)

Associate Director
- Q5. Organisation (where relevant)

Lichfields on behalf of Mrs Jenny Adams, Planning Manager, of
Ainscough Strategic Land Ltd.

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

Ainscough Strategic Land (ASL) has land interests at Wharf Road, Wroughton. A promotion agreement is in place and the land is available for development. Wroughton is identified as a Rural Service Centre within Table 1 'Settlement Hierarchy' of Policy SS2. Table 1 identifies Rural Service Centres as second in the hierarchy as a focus for development, second only to Swindon's main urban area. It is therefore concerning that Policy SS1 is silent on the role that the Rural Service Centres can play in helping to deliver sustainable growth. Policy SS1 must identify that Rural Service Centres can deliver not just 'supplementary growth' as suggested for larger villages and hamlets, but that they are sustainable locations with an important range of services that can contribute towards the delivery of housing and employment growth. We suggest that Policy SS1 provides Rural Service Centres with greater weight than Strategic Growth Locations, as these areas can deliver housing without the need for significant infrastructure delivery and can help to bolster existing services and facilities. Sites within and adjacent to Rural Service Centres, such as ASL's land interests at Wroughton, can deliver quickly to increase Swindon's housing land supply and contribute towards Strategic Objective SO4. We raise concerns that Policy SS1 has been designed to stymie growth that is proposed on locations away from Swindon's urban area and on allocated sites. Policy SS1 should provide flexibility for suitable, sustainable locations on the edge of existing settlements to come forward where they are sympathetic to local character. This is particularly important given the scale of some of the proposed Strategic Growth Locations, which will take time to plan, secure various approvals and then deliver. Lichfields' Start to Finish third edition, 2024 sets out that sites in the New Eastern Villages and Kingsdown will take in excess of 6 years to deliver (Figure 3.1) and smaller sites such as Land at Wharf Road Wroughton should be allocated to support growth early in the plan period.

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.

Policy SS1 must be changed to include Rural Service Centres and set out the policy expectations for these locations. We suggest that Rural Service Centres are given a status that acknowledges how these areas can deliver housing without the need for significant infrastructure delivery and can help to bolster existing services and facilities. Our suggested text is below: Policy SS1: Swindon's Spatial Approach to Growth 1. The main focus for housing, commercial and industrial growth for Swindon, including most of its supporting infrastructure, services and facilities, is illustrated on Figure 2 and will be:... ..c. Rural Service Centres, in particular Highworth and Wroughton, where they are sympathetic to local character and help to support local services and facilities. d. the Strategic Growth Locations of New Eastern Villages, Wichelstowe, Kingsdown, East Wroughton and North Tadpole.



Respondent No: 402

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- Q1. **Title** Mr
- Q2. **First Name** Alex
- Q3. **Last Name** Hawtin
- Q4. **Job Title (where relevant)** not answered
- Q5. **Organisation (where relevant)** Lichfields on behalf of Mrs Jenny Adams, Planning Manager, of Ainscough Strategic Land Ltd.

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

Policy SS2 sets out that Wroughton is a Rural Service Centre. The description of the Rural Service Centres significantly underplays the role that these locations have for the existing population and the role they can play in helping to deliver the Strategic Objectives of the Local Plan and the growth required to meet the housing requirements set out in Policy SP2. Wroughton is a sustainable location with a range of services and facilities, including primary and secondary schools, designated Primary Rural Centre and excellent links to Swindon which will be enhanced through improvements to the Key Transport Corridor. Policy SS2 should acknowledge this and, linked to Policy SS1, should encourage proposals for proportionate housing and employment growth that is sympathetic to local character in addition to the strategic location. Given that Wroughton is proposed to take on a different role and accommodate strategic growth this must be acknowledged and reflected in Policy SS2 and its supporting text. Wroughton will perform a very different role compared to Highworth, where little growth is proposed. Developments at Wroughton will not require significant infrastructure delivery unlike some of the proposed allocations on existing / growing urban extensions. Housing and employment growth within Wroughton would help to contribute towards Strategic Objectives SO2, SO3, SO4, SO5 by delivering and helping to maintain services and facilities in the villages and providing housing to meet local needs and enhancing the existing community.

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.

The policy text for SS2 should be amended as follows: 2. In line with Policy SS1, the main focus for housing and employment growth will be in the Urban Area Sustainable Development Locations, Urban District Centres, Industrial Locations, [Rural Service Centres] and Strategic Growth Locations. The Rural Service Centres text within Table 1 should be updated to acknowledge the role these locations have in supporting the sustainable growth set out in the plan. Our suggested text is below: Rural Service Centres: Medium sized settlements that remain separate from Swindon's Urban Area and sit within a more rural setting. These settlements [have an important range of] services and facilities that include health, education and leisure and serve a wider rural catchment. [They usually have good accessibility and regular public transport connections into the Urban Area. Greater development is promoted at Wroughton to reflect its sustainability credentials and important role with the Local Plan.]



Respondent No: 403

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Q1. Title

Mr

Q2. First Name

Alex

Q3. Last Name

Hawtin

Q4. Job Title (where relevant)

not answered

Q5. Organisation (where relevant)

Lichfields on behalf of Mrs Jenny Adams, Planning Manager, of
Ainscough Strategic Land Ltd.

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

It is positive to see that the draft Local Plan plans for growth within Wroughton, given its important role as a Rural Service Centre. We query why current draft allocation ref. 18-023 is proposed to be allocated, when planning permission (both outline and reserved matters) and development has commenced on site, with a commencement notice issued to the Council on 4 September 2025. Notwithstanding this, we note that the current draft allocation ref. 18-023 enters into the adopted Non-Coalescence Area whilst draft allocation ref. 18-020 significantly reduces the gap between Wroughton and Wichelstowe. Adopted Policy NC1 and emerging Policy CSE7 make clear that the character and identity of Wroughton will be protected by a principle of non-coalescence between it and Wichelstowe, and the village shall remain part of the countryside. This important principle appears to have been disregarded or not consistently applied across the proposed site allocations as there are more suitable alternatives for growth. We raise concerns that the same principles apply to draft allocation 18-020 and query whether this would result in the character of Wichelstowe and Wroughton being perceived as one. The current draft suite of allocations 18-020, 18-021, 18-022 and 18-023 place a significant amount of growth along Swindon Road. A number of developments are proposed along Swindon Road and its capacity should be tested to avoid potential highway safety issues. We are concerned that thorough capacity testing of the Wroughton Strategic Location sites has not been undertaken to underpin the proposed site allocations. This includes a detailed review of technical constraints such as highways, flooding and landscaping in terms of National Landscape and how the sites can adequately respond to the non-coalescence issues. We therefore anticipate that there will be a shortfall in housing numbers and a requirement for additional sites to be identified. As set out within our accompanying Cover Letter and Call for Sites submission, the land at Wharf Road represents a logical extension to Wroughton that has no significant technical constraints. A growth strategy should be developed that proposed balanced growth on a range of site sizes and locations. The current strategy relies upon a limited pool of sites in a linear location on Swindon Road, northeast Wroughton that is likely to deliver slowly based on Lichfields' Start to Finish Analysis of similar sized strategic site allocations. The land at Wharf Road should therefore be allocated as it represents a smaller site that can deliver in the short term without significant infrastructure requirements.

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.

See above comments. The land at Wharf Road should be identified as a separate allocation that can come forward in the short term and complement larger scale growth elsewhere in the borough.



Respondent No: 404

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- Q1. **Title** Mr
- Q2. **First Name** Alex
- Q3. **Last Name** Hawtin
- Q4. **Job Title (where relevant)** not answered
- Q5. **Organisation (where relevant)** Lichfields on behalf of Mrs Jenny Adams, Planning Manager, of Ainscough Strategic Land Ltd.

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

We support the decision to provide a Plan Period of 20 years. This should be a rolling period which extends as the Local Plan moves through the plan-making stages and time elapses. As per the requirements of the Local Plan Regulations (2017), the plan should be kept up to date with a review at least every five years. We support the use of the Standard Methodology for calculating housing need as per the requirements of the National Planning Policy Framework para. 62. This is the minimum requirement, and an element of flexibility should be built into the housing requirement to cater for sites that may not deliver at the expected pace or may not come forward. At least a 10% buffer should therefore be added to the overall housing requirement to allow for this; the current 'buffer' of 1,000 homes described in the supporting text (para 6.8) is insufficient (just 4% over a 20-year plan period).

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.

Additional housing sites must be identified to enable the provision of a minimum 10% buffer. Para. 6.7 should be amended to refer to the 10% buffer to provide flexibility.

Planning Policy Team
Swindon Borough Council
5th Floor,
Civic Offices,
Euclid Street,
Swindon,
SN1 2JH

Date: 13 October 2025

Our ref: 67638/03/AC/9014A0BABD2F04/40074732v3

To Whom It May Concern

**Swindon Borough Council Local Plan: Publication Stage (Regulation 18)
Draft Local Plan Representations for Land West of Wharf Road,
Wroughton.**

On behalf of our client, Ainscough Strategic Land Ltd (“ASL”), please find enclosed with this cover letter representations to the Swindon Borough Council Publication Stage (Regulation 18) Consultation for Land West of Wharf Road, Wroughton, Swindon (“The site”).

The representations consist of this cover letter, plus the following documents:

- 1 Regulation 18 Representation Form;
- 2 Call for Sites form; and
- 3 Site Location Plan (ref. JO055574-23-02).

Background

ASL is a strategic land promoter and family-owned business who works with commercial and rural landowners to progress land for development through the planning system. It has successfully delivered strategic sites across the south west including at Lotmead Farm, Swindon.

Lichfields has been appointed to promote the site for residential development through the emerging local plan. The Wharf Road site is suitable, available and deliverable and free of significant constraints. The site is available for development in 2027 following the grant of planning permission.

The representations attached identify concerns with the Local Plan as currently drafted. The opportunity to deliver sustainable growth across Wroughton needs to be fully embedded within the Plan with the allocation of a range of site locations and sizes to ensure consistent housing delivery. The Wharf Road site can make an important contribution to meeting Swindon’s future housing needs and merits detailed consideration for allocation in the next stage of the Plan alongside the wider strategic growth location proposed.

The below section provides an overview of the site and the opportunity and should be read alongside the summary Call for Sites submission form.

The Site

The site is located west of Wharf Road (B4005), on the edge of the settlement of Wroughton. It is located to the rear of properties on Ashen Copse Road and Ashen Copse Wood which is proposed to be allocated as open space. The site area is approximately 4.7 hectares (see site plan at Appendix 1).

The site is in a sustainable location within walking distance to shops, services and schools. Wharf Road has bus stops located 90m south east of the site which provide a half-hourly service to Swindon. A new footpath from the site on Wharf Road can be provided within the large highways verge; this would enable a link to the north of the junction with Maunsell Way, both bus stops and to the Rural Centre beyond. Existing public right of ways that cross the northern field diagonally will be retained and enhanced through any application.

The site has good access to open space, located 0.5km from Maunsell Way Recreation Ground, which includes a BMX track and sports pitches. The 2014 Open Space Audit and Assessment¹ noted that Wroughton and Wichelstowe Ward has above average quantity of open space, at an average quality but with good accessibility. New development would help to sustain and enhance these existing facilities.

The Proposals

The site has the potential to deliver c. 120 homes as a logical extension to Wroughton that can round off the northwestern edge of the settlement without extending beyond the existing northern or western edges of the village. It would avoid encroaching into the area of non-coalescence designated in both the adopted and emerging local plan.

As set out below, there are no significant constraints, and development can be brought forward to retain the existing landscape and ecological features such as hedgerows (with adjustments for access) and trees.

Technical Issues

The following section provides a headline overview of the key issues in relation to the site's delivery.

Highways

A suite of traffic surveys has been undertaken to understand local conditions and no significant constraints have been identified on the highway network.

A Transport Assessment will be undertaken at planning application stage with a Framework Travel Plan prepared to maximise sustainable transport and encourage active travel. The site is within walking and cycling distance of local facilities including the leisure centre, health facilities and shops including Tesco Express at the Ellendune Shopping Centre.

¹ Swindon Borough Council (March 2014) Open Space Audit and Assessment Update. Part A: Report

Ecology

Ecological surveys that have been carried out onsite include habitat surveys and habitat condition assessments to inform the BNG, bat tree assessments, bat activity and automated surveys, eDNA surveys of offsite ponds for great crested newts, and dormouse nest tube surveys.

To date, no evidence of dormice has been recorded within the Site, and of the ponds where access was granted, no evidence of great crested newts was found. None of the trees were recorded as having potential roosting features for bats, although the results of the bat activity surveys are still being analysed. Retention of dark corridors around the hedgerows and trees lines will ensure that foraging opportunities for bats are retained.

The habitat surveys have identified the Site as comprising modified grassland and other neutral grassland fields in poor condition, along with boundary hedgerows, scrub and lines of trees. The vast majority of the boundary hedgerows will be retained, with only minor losses to facilitate access, while the loss of areas of modified grassland and other neutral grassland will be offset through enhancement to retained grassland to increase its condition. The proposals will ensure that a net gain in BNG units will be achieved in accordance with The Environment Act, either onsite or through offsite credits.

A tree survey has been prepared which identifies categories A, B, C and U category trees. This assessment will inform forthcoming masterplanning, which will seek to retain high and moderate quality trees.

Drainage and Flooding

The site is at low risk of flooding (Flood Zone 1) from fluvial sources.

An initial review of surface water risk has identified that the Gov.uk mapping² does not consider key on-site features such as ditches and therefore hydraulic modelling is being undertaken to determine an accurate baseline. This drainage scheme, informed by the modelling, will demonstrate that the site is safe from surface water flooding.

Heritage and Archaeology

There are designated heritage assets 600m to the south of the site including Parish Church of St John and St Helen (Grade I), Wroughton House (Grade II*) on Church Hill and the Lantern Cottage (Grade II). There are significant landscape belts between the sites and these heritage assets.

A heritage assessment is being prepared, however at this early stage, impacts are not anticipated on Lantern Cottage and are anticipated to be, at most, at the low end of the scale of less than substantial harm. The assessment will ensure that any designs coming forward would provide a sensitive response.

In terms of archaeological remains, negotiation with the county archaeologist is required, although there is no indication of archaeological remains which could undermine the principle of development. A geophysical survey will be undertaken to determine the extent of archaeological trenching required and whether mitigation is necessary.

² <https://flood-map-for-planning.service.gov.uk/>

Landscape

The site is not within a designated landscape at a national or local level. In landscape terms the site is within Host LCA: iii Wroughton Vale (Swindon Landscape Character Areas SPG). The site consists of low-lying vale landscape and mitigation will be included along the site's northern, western and southern boundaries to allow for integration into the landscape setting which is to the north of an elevated ridgeline within the North Wessex Downs National Landscape.

This mitigation will create a soft edge to the settlement and help to manage any close-range views from the public rights of way network which runs through and close to the site; views from the approach along Wharf Road into Wroughton from the north; as well as residential receptors along the eastern boundary; and from elevated ground to the south.

Consideration will be given to the amenity of the Public Right of Way through the site and the visual amenity of neighbouring residents. The existing landscape framework provides clear opportunities for enhancement of existing features in line with the landscape character.

Summary

The site represents a logical and proportionate sustainable site which would provide important, much-needed housing for Wroughton and Swindon. It must be considered comprehensively by the Council as an additional residential allocation that can be delivered in the short term and would ensure the Plan is robust in providing a range of site locations and sizes.

If you require further information on any aspects of these representations or the Call for Sites submission, please contact me.

Yours faithfully

Alex Hawtin

Associate Director

MPlan MRTPI

Enclosures Regulation 18 Representation Form
 Call for Sites form



Respondent No: 405

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title

Mr

Q2. First Name

Tom

Q3. Last Name

Clarke MRTPI

Q4. Job Title (where relevant)

National Planning Manager

Q5. Organisation (where relevant)

Theatres Trust

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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

FE6: Evening, Night-time and Cultural Economy We welcome inclusion of this policy, in particular part 5 which provides strong protection for existing venues from incompatible neighbouring developments.

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

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Chapter	10	Policies Map	Evidence base document e.g. the Sustainability Appraisal
---------	----	--------------	--

If selecting chapter, please note policy number and paragraph number if applicable.

4. COMMENTS

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

HL5: Community Infrastructure

We support the premise of this policy, but with regards to part 5 we consider this should be revised for greater robustness and to ensure better guarding against unnecessary loss in line with paragraph 98 of the NPPF (2024).

We suggest that part b) is unnecessary because the presence of a similar facility elsewhere does not mean that the site subject to application should also not be retained. Parts a), c) and d) deal with re-provision, loss and lack of need although for succinctness we suggest parts c) and d) can be merged.

We also suggest that part e) is removed, because commercial viability can be manipulated and it may be the case that a facility which is unviable on a full commercial basis could be successful under an alternative model of operation such as community ownership. Part f) adequately deals with that consideration, which makes part e) redundant.

We recommend that the period of marketing is extended to eighteen months, as this would more definitively prove lack of interest and better enable local groups to come together and prepare grant and funding bids.

(Continue on a separate sheet /expand box if necessary)

5. CHANGES

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.

4. Proposals that would result in the loss of community facilities must demonstrate that:
- a) The facility is being reprovided elsewhere to better meet the needs the local people served; or
 - b) ~~There are sufficient, suitable, alternative community facilities nearby; or~~
 - c) ~~The community facility is no longer required by the community; or~~
 - d) There is no longer a need or demand for the community facility, demonstrated by genuine marketing evidence for a period of at least ~~one year~~ eighteen months.
 - e) ~~The community facility is no longer economically viable for the established use; or~~ and
 - f) There is no existing management and funding resources or that could be generated within the community that could secure and sustain a community facility that meets identified local needs; or
 - g) The community facility cannot be secured or sustained through the partial redevelopment of the site.

(Continue on a separate sheet /expand box if necessary)

Please note in your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested change (s). You should provide succinct responses that set out the changes you suggest in a few sentences. You should not assume that if sending through significant amounts of information it will be summarised. If sending any documents through you will need to provide a summary that will be considered.



Respondent No: 406

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title Mr

Q2. First Name Tom

Q3. Last Name Clarke MRTPI

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) Theatres Trust

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[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.

HL5: Community Infrastructure We support the premise of this policy, but with regards to part 5 we consider this should be revised for greater robustness and to ensure better guarding against unnecessary loss in line with paragraph 98 of the NPPF (2024). We suggest that part b) is unnecessary because the presence of a similar facility elsewhere does not mean that the site subject to application should also not be retained. Parts a), c) and d) deal with re-provision, loss and lack of need although for succinctness we suggest parts c) and d) can be merged. We also suggest that part e) is removed, because commercial viability can be manipulated and it may be the case that a facility which is unviable on a full commercial basis could be successful under an alternative model of operation such as community ownership. Part f) adequately deals with that consideration, which makes part e) redundant. We recommend that the period of marketing is extended to eighteen months, as this would more definitively prove lack of interest and better enable local groups to come together and prepare grant and funding bids.

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 also see attached response for formatted text.



Respondent No: 407

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- Q1. Title Mr
- Q2. First Name Tom
- Q3. Last Name Clarke MRTPI
- Q4. Job Title (where relevant) not answered
- Q5. Organisation (where relevant) Theatres Trust

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

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[REDACTED]

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

Site allocation 18-008 - Regent Place and Princes Street Car Park We have no objections to this site allocation, but development around the Wyvern must be sensitively designed and located to avoid conflict with the theatre's operations. This includes recognition that theatres and performance venues have particular access and servicing needs associated with the delivery and removal of sets and equipment. This can include operations at night and early mornings to facilitate touring shows.

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: 408

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Rob

Q3. Last Name Basford

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

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[REDACTED]

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

Fully reinstate the Oasis Facilities , Housing only on the clares accessories old site please.

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: 409

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- Q1. Title Miss
- Q2. First Name Grace
- Q3. Last Name Lewis
- Q4. Job Title (where relevant) Town Planner
- Q5. Organisation (where relevant) Network Rail Ltd

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

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[REDACTED]

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

We agree with the assessment that routes between the station and town are not as clear as they could be. We support moves to enhance active travel links from the station, as well as better bus integration (which may require review of the existing one-way system).

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: 410

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- Q1. Title Miss
- Q2. First Name Grace
- Q3. Last Name Lewis
- Q4. Job Title (where relevant) not answered
- Q5. Organisation (where relevant) not answered

[REDACTED]

[REDACTED]

[REDACTED]

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

We support the reference in the plan to protecting the existing use of Hawksworth Depot and Swindon sidings for future rail use.

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.

It would be helpful if Swindon Sidings could be additionally defined as being the sidings at Swindon Up Yard (Cocklebury) and Swindon Down Yard, to be absolutely clear in railway terms which location is meant.



Respondent No: 411

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- Q1. Title Miss
- Q2. First Name Grace
- Q3. Last Name Lewis
- Q4. Job Title (where relevant) not answered
- Q5. Organisation (where relevant) not answered

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

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[REDACTED]

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

We would agree that any potential for new stations east or west of Swindon is in the longer-term. We are happy to work with SBC and others on assessing the feasibility of such proposals. It is helpful that this entry notes the potential need for additional infrastructure works to support the delivery of a new station, as that is likely to be requirement.

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: 412

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title	Miss
Q2. First Name	Grace
Q3. Last Name	Lewis
Q4. Job Title (where relevant)	not answered
Q5. Organisation (where relevant)	not answered

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

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[REDACTED]

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[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

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

We support the view that maximum use should be made of Swindon station and welcome support for the reinstatement of Bristol – Oxford services. We also welcome the inclusion of North Star Car Park, the Old BT building and the majority of the Swindon Station within a Sustainable Growth designation. With regards to the extension of Birmingham/Banbury services beyond Oxford to/from Swindon – we would consider the Bristol – Oxford service (a more likely prospect in the near term) as being a stepping stone to building a market for this flow and that in future a second hourly Bristol – Oxford service could be extended towards Banbury/Birmingham. This is likely to be a long-term proposition, and one which would need additional infrastructure to unlock the necessary capacity. With regards to freight sites, such as South Marston, it is worth noting that for them to be useful interchanges, sufficient land adjacent to the rail infrastructure needs to be protected as well, not just the sidings. Further to this we would like to understand what may be acceptable within the mixed use transitional site designation currently allocated to the UKRI site, Carriage Works, eastern section of Bristol Street Car Park and a western section of NR's surface car parks. These areas a key elements of delivering the proposed Knowledge Central Regeneration which will require as broad a definition of acceptability as possible in order to drive this important regeneration for Swindon.

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: 413

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- Q1. Title Mr
- Q2. First Name Nicholas
- Q3. Last Name Orman
- Q4. Job Title (where relevant) not answered
- Q5. Organisation (where relevant) not answered

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

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

While climate mitigation measures do contribute to net zero, adaptation measure cannot by definition contribute to either low carbon or net zero carbon. They merely adapt the environment to cope with the changes that will result from climate change. Notwithstanding this the policy of requiring appropriate adaptation measure in new and existing development should be retained.

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.

Amend SO6 to read "SO6 – Low Carbon – Together we will push for a greener Swindon by seeking to achieve net zero carbon by requiring appropriate mitigation, and by improving the sustainable travel offer. " And amend SO7 by adding: "incorporating climate adaption measures for new and existing development". At the end of the paragraph.



Respondent No: 414

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Nicholas

Q3. Last Name Orman

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]

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

Cycling is also an important mode of sustainable local transport

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.

Amend the start of 2(a) to read "Include pedestrian and cycling links..."



Respondent No: 415

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Nicholas

Q3. Last Name Orman

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

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[REDACTED]

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[REDACTED]

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

It is important that this development does not undermine the separation between Wroughton and both Wichelstowe and the Swindon Urban Area in line with Policy SS1 Para 2, policy SS2 paragraph 1 and Table 1.

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.

Add 2 e) "Protect the character and identity of Wroughton by the principle of non-coalescence between Wroughton and adjacent settlements, as identified on the Policies Map in accordance with policy CSE7. "



Respondent No: 416

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Nicholas

Q3. Last Name Orman

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

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

It is important that this development respects the character of the settlement and its existing village core.

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.

Add 2 f) "Development must contribute towards to maintaining an integrated village that continues to have a distinctly rural and separate identity and does not undermine the existing village centre. "



Respondent No: 417

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Nicholas

Q3. Last Name Orman

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

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

As the designated area will be an edge of settlement development in a rural setting, buildings should be low rise (see para 5.8)

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.

Add 2 g) "Development should be relatively low-rise, and low density reflecting its position outside the village core in accordance with policy SD6 and its proximity to more sensitive natural environments including the North Wessex Downs National Landscape in accordance with policy CSE7."



Respondent No: 418

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Nicholas

Q3. Last Name Orman

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

[REDACTED]

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[REDACTED]

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[REDACTED]

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

The scale of the proposed additional housing will have an impact on the character of the village. This would be more marked if the development of the whole area were to be undertaken simultaneously. The development should therefore be phased over the full plan period

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: 419

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Nicholas

Q3. Last Name Orman

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

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

List of policies SD6 does not align with the title of the policy

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.

Update table in line with titles of proposed policies



Respondent No: 420

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Nicholas

Q3. Last Name Orman

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.

Sustainable is not just about carbon, but also about sustainable use of water and adaptation to extremes of weather.

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.

After "CSE 2" insert ", water use in accordance with policy U1 and mitigates the effects of extreme weather in accordance with policy CSE6 "



Respondent No: 421

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Nicholas

Q3. Last Name Orman

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

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

Local facilities for daily needs should be within walking or cycling distance of new residential development.

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.

Add "Promotes active travel by ensuring that residents can meet as much as possible of their daily needs within reasonable walking or cycling distance"



Respondent No: 422

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Nicholas

Q3. Last Name Orman

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

[REDACTED]

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

There are other ways to make effective use of land by multifunctional use of green space for Amenity, Biodiversity and Sustainable Drainage.

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.

Reword as: "1. Development proposals should make effective use of land through (a) optimising density (including through the use of layout and design), whilst being sympathetic to the surrounding environment. (b) making multifunctional use of land for amenity, biodiversity and sustainable drainage in accordance with the principles of the National Standards for Sustainable Drainage (Defra, 2025)."



Respondent No: 423

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Nicholas

Q3. Last Name Orman

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

[REDACTED]

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

It is not clear what is meant by 'villages' in the context of the settlement hierarchy in set out in Table 1.

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.

Amend the start of paragraph 1 to read: "Development proposals within the settlement boundaries outside the urban area (i.e. rural service centres, larger villages and small villages and hamlets) should refer to relevant...."



Respondent No: 424

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Nicholas

Q3. Last Name Orman

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

Extensions and alterations are an opportunity to improve the energy performance of existing buildings

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.

Add new sub-paragraph: h) The energy performance of the altered or extended building is improved to EPC C or above.



Respondent No: 425

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Nicholas

Q3. Last Name Orman

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

These is too important to be aspirational

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.

In (j) delete "where feasible" and "in the next generation" In (n) replace "exploring the decarbonisation of our transport network" and replace with "making provision for decarbonisation of our transport network"



Respondent No: 426

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Nicholas

Q3. Last Name Orman

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

Street trees will not create an unacceptable ongoing maintenance liability on the public highway if appropriate species are selected and planted in appropriate conditions. See 'Trees in Hard Landscapes' it is free from <https://www.tdag.org.uk/trees-in-hard-landscapes.html>.

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.

Delete "(where this does not create an unacceptable ongoing maintenance liability on the public highway)" and replace with "(see CES 6)"



Respondent No: 427

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Nicholas

Q3. Last Name Orman

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

Pedestrian routes which follow main roads without adequate footways (e.g. access from Ridgeway Park estate in Wroughton along Marlborough Road to the village centre) discourage walking and encourage use of cars.

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.

Add "Active travel routes connecting major developments to local centres shall be at least 1.5 m wide especially where they are provided as footways along busy roads."



Respondent No: 428

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

Q1. Title not answered

Q2. First Name Nicholas

Q3. Last Name Orman

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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[REDACTED]

[REDACTED]

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[REDACTED]

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

Words appear to be missing

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.

Insert "low- or zero-emission" before vehicles



Respondent No: 429

[REDACTED]

[REDACTED]

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[REDACTED]

Q1. Title not answered

Q2. First Name Nicholas

Q3. Last Name Orman

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

The reference to electric boilers. Heat pumps are a much more efficient and economic than electric boilers. Where heat pumps are used these will be no less viable than other sources including mains gas.

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.

Replace "electric boilers" with "heat pumps" and delete "where viable".



Respondent No: 430

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Nicholas

Q3. Last Name Orman

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

This is vague and could be taken to mean anything. A metric is required.

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.

Replace c) and d) with a maximum energy use intensity (e.g. 35 kWh/m² /yr)



Respondent No: 431

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

Q1. Title not answered

Q2. First Name Nicholas

Q3. Last Name Orman

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

Tree planting has a significant effect on reducing the urban heat island effects "Trees work wonders by reducing temperatures on hot days. Heat maps show that across 5 major English cities, areas with more trees and green spaces are up to 5 degrees cooler" (Reference <https://www.treesforcities.org/resources/how-urban-trees-turn-down-the-heat>)

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.

At the end on sub-paragraph a) add "and tree-planting in accordance with policy CSE6".



Respondent No: 432

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

Q1. Title not answered

Q2. First Name Nicholas

Q3. Last Name Orman

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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[REDACTED]

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

To make most efficient use of land the plan should promote multifunction use of land for sustainable drainage and other purposes

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.

Add new sub-paragraph "Vegetation provided as part of Sustainable Drainage (SUDS) in accordance with Principle 3 of the DEFRA National Standards for Sustainable Drainage July 2025 should form part of the green infrastructure provision."



Respondent No: 433

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Nicholas

Q3. Last Name Orman

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

Waste heat from certain industrial developments should not be wasted but should be reused.

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.

Add additional paragraph "Proposed developments generating large amounts of waste heat (e.g. data centres) shall be required to submit with their application proposals for using the waste heat, e.g. in district heating systems either within the development or in a nearby location."



Respondent No: 434

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Nicholas

Q3. Last Name Orman

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

To make most efficient use of land this should promote multifunctional use of land

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.

Add new sub-paragraph "Vegetation provided as part of Sustainable Drainage (SUDS) in accordance with Principle 3 of the DEFRA National Standards for Sustainable Drainage July 2025 should form part of the green infrastructure provision."



Respondent No: 435

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Nicholas

Q3. Last Name Orman

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

Poor species selection and inappropriate planting times (reflecting that our summers have become increasingly hot and dry) means many newly planted trees die. A particular example of this is the trees planted for Biodiversity Net Gain on the A14 improvement project in Cambridgeshire. Trees must be maintained by developers to until established, replacing any trees that do not survive.

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.

Add new paragraph 4. The developer shall make provision to ensure that new tree planning is maintained and managed by the developer until established replacing any trees that die before they become established.



Respondent No: 436

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Nicholas

Q3. Last Name Orman

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

Areas of non-Coalescence This policy, which is retained from the current local plan is really important to the those who live in settlements outside the Swindon urban area. I am pleased to see it is retained.

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.

No Change



Respondent No: 437

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Nicholas

Q3. Last Name Orman

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

Paragraph 3 almost negates paragraph 2. The hierarchy should not be seen as a series of alternatives, but that the possibility of provision in one level should be exhausted before providing any additional provision at the next or subsequent priorities.

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.

Replace Paragraph 3 with: "To utilise a lesser priority location for delivery, appropriate evidence shall be provided that demonstrates all higher priority locations have been utilised to the maximum extent practicable. Higher cost alone shall not be a reason to utilise lower priority locations."



Respondent No: 438

[REDACTED]

[REDACTED]

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[REDACTED]

Q1. Title not answered

Q2. First Name Nicholas

Q3. Last Name Orman

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

Some biodiversity will come from the provision of a Sustainable Drainage System in accordance with the DEFRA National Standards for Sustainable Drainage July 2025, Standard 6 (see policy CSE9). These standards are cross referenced in the PPG on Flood Risk.

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.

Add new paragraph after paragraph 3 "On site provision shall include any biodiversity gain from the sustainable drainage system in accordance with Standard 6 (biodiversity) of the DEFRA National Standards for Sustainable Drainage July 2025."



Respondent No: 439

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

Q1. Title not answered

Q2. First Name Nicholas

Q3. Last Name Orman

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

The importance of policies relating to developments affecting flood risk elsewhere was highlighted in a recent planning appeal for a site in Littlehampton in which the wording of the policy in Arun District Councils local plan was important in the developer losing their appeal. However the difference between paragraphs 1(b) and 1(e) is not clear and creates ambiguity.

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.

Reword the paragraphs and place them together. (b) Not adversely affect flood routing of flow from outside the site and thereby increase flood risk, including risk of sewer flooding, elsewhere on, or off, site; (e) Demonstrate adequate provision within the design of the site to reduce prevent surface water from the development site causing increasing any form of flood risk elsewhere.



Respondent No: 440

[REDACTED]

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Q1. Title not answered

Q2. First Name Nicholas

Q3. Last Name Orman

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

Paragraph 4 should reference the Defra National Standards for Sustainable Drainage and mention in particular Principle 10 which states "All appropriate planning applications should demonstrate how the national standards have been met in the site design."). These standards are cross referenced in the PPG on Flood Risk.

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.

Before paragraph 4(a)(i) insert: "comply with the requirements of the National Standards for Sustainable Drainage (Defra)"
Add (b): "All appropriate planning applications shall demonstrate how the National Standards for Sustainable Drainage have been met in accordance with Principle 10 of those standards"



Respondent No: 441

[REDACTED]

[REDACTED]

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[REDACTED]

Q1. Title not answered

Q2. First Name Nicholas

Q3. Last Name Orman

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

There is no technical justification for this blanket ban on SuDS in Flood Zone 3. The CIRIA SuDS Manual para 8.8 sets out instances where SuDS are compatible with Zone 3.

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.

Delete paragraph 5.



Respondent No: 442

[REDACTED]

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Q1. Title not answered

Q2. First Name Nicholas

Q3. Last Name Orman

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

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

This policy deals extensively with air pollution but there no specific paragraph on water pollution. There are a number of watercourses in Swindon that already do not meet 'good' standards. The ecological status of the Ray is 'Moderate' and the Cole is 'Poor'. The NPPF para 187(e) specifically mentions water quality as does the PPG on Water supply, wastewater and water quality. The PPG points to the local planning authority's duties under the Water Framework Regulations, which require 'no detriment' in water quality. The potential impact of development on water quality include: a) The impact of pollutants in discharges from piped surface water drainage (direct to watercourse). b) The impact of increased discharges from downstream combined sewer overflows where, in accordance with the hierarchy, discharge of surface water is to a combined sewer

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.

Add an additional paragraph as follows. "Development must as a minimum, not adversely impact on water quality of downstream watercourses. Applications shall demonstrate how the development will comply with standards 1 and 4 of the National Standards for Sustainable Drainage (Defra)."



Respondent No: 443

[REDACTED]

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Q1. Title not answered

Q2. First Name Nicholas

Q3. Last Name Orman

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

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

The provision of trees contributes to climate change adaptation in ways not mentioned in the supporting text to this policy. 1) Trees can contribute to reducing flood risk as part of sustainable drainage in accordance with the National Standards for Sustainable Drainage (Defra 2025).). These standards are cross referenced in the PPG on Flood Risk. 2) Tree coverage in urban areas at around the levels proposed in CSE6 paragraph 3, can reduce the urban heat island effect, reducing extreme temperature by around 5 Celsius. "Trees work wonders by reducing temperatures on hot days. Heat maps show that across 5 major English cities, areas with more trees and green spaces are up to 5 degrees cooler" (Reference <https://www.treesforcities.org/resources/how-urban-trees-turn-down-the-heat>). 3) Trees can also reduce air pollution in urban areas.

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.

Add new paragraph after 9.18. "Urban trees can also provide the following benefits. a) When incorporated into sustainable drainage in accordance with the National Standards for Sustainable Drainage (Defra 2025) they can reduce surface water flood risk. b) Areas with more trees and green spaces are up to 5 degrees cooler" (Reference <https://www.treesforcities.org/resources/how-urban-trees-turn-down-the-heat>). Urban trees have also been shown to reduce air pollution. "



Respondent No: 444

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Nicholas

Q3. Last Name Orman

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

There is no context to highlight that there are areas of unacceptable flood risk in the Borough.

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.

Add new paragraph before 9.29 "There are several areas of unacceptable flood risk to properties in the borough in both the Cole and Ray catchments. The updated flood risk mapping published by the Environment Agency in March 2025 has shown worse flood risk than previously understood, particularly in some of the upstream sections of these catchments."



Respondent No: 445

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

Q1. Title not answered

Q2. First Name Nicholas

Q3. Last Name Orman

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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[REDACTED]

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

The guidance Improving the Flood Performance of New Buildings – Flood Resilient Construction was not updated in 2021 as stated in this paragraph, it was just republished on the government website. By separating this paragraph from 9.30, it is not clear that it is only intended for use where, exceptionally, buildings are placed in flood risk areas.

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.

Merge paragraph with 9.30 and delete “update 2021”.



Respondent No: 446

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Nicholas

Q3. Last Name Orman

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

This paragraph is in conflict with the National Standards for Sustainable Drainage and the CIRIA SuDS Manual.). These standards are cross referenced in the PPG on Flood Risk. Multifunctional use of SuDS space for amenity purposes is to be encouraged. If this paragraph remains in its present form it will unnecessarily increase costs and trigger the 'unviability' argument unnecessarily. Standard 5 of the Defra Standards states "A 'SuDS approach' shall be adopted that maximises benefits for amenity through the creation of multi-functional places and landscapes." Some SuDs features will only flood on average once in 1, 2, 10, 30 or even 100 years this is no impediment to the use of these areas as public open space the rest of the time. The Deanery School playing fields are in a designated flood storage area but are only likely to flood very infrequently.

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.

Delete paragraph 9.32



Respondent No: 447

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

Q1. Title not answered

Q2. First Name Nicholas

Q3. Last Name Orman

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

There is no mention of water pollution.

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.

Add new text after 9.40. "There are several watercourses in Swindon that already do not meet 'good' water quality standards. The ecological status of the Ray is 'Moderate' and the Cole is 'Poor'. The Water Framework Regulations require that developments should not result in any detriment in water quality. The potential impact of development on water quality include: a) The impact of pollutants in discharges from piped surface water drainage (direct to watercourse). b) The impact of increased discharges from downstream combined sewer overflows where, in accordance with the hierarchy, discharge of surface water is to a combined sewer"



Respondent No: 448

[REDACTED]

[REDACTED]

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[REDACTED]

Q1. Title not answered

Q2. First Name Nicholas

Q3. Last Name Orman

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

Separation of foul and surface water is not sufficient, the surface water infrastructure must meet the requirements of the Defra standards for Sustainable Drainage.

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.

At the end of paragraph 1(b) insert “ and the provision of surface water infrastructure in accordance with the National Standards for Sustainable Drainage”.



Respondent No: 449

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Nicholas

Q3. Last Name Orman

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

Swindon is designated as a 'seriously water stressed area'. 110 l/p/day is in line with current lower limit for such areas in Building Regulations regulation 36, where "... where the planning permission under which the building work is carried out— (a) specifies the optional requirement in paragraph (2)(b); and (b) makes it a condition that that requirement must be complied with." MHCLG is currently consulting on lowering this limit from 110 l/person/day to 100 l/person/day. It is entirely possible that this will be further amended below 100 l/person/day during the life of this plan. Draft plans for Vale of the White Horse DC and South Oxfordshire DC both now specify 100 l/p/day.

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.

Replace paragraph 9 with the following. "9. New developments should demonstrate how they have made provision for rainwater harvesting to utilise as much of the surface water to the maximum extent practicable for non-potable use in accordance with Standard 1 of the National Standards for Sustainable Drainage (Defra 2025). "



Respondent No: 450

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Nicholas

Q3. Last Name Orman

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

The National Standards for Sustainable Drainage Standard 1 Hierarchy of connection requires that in seriously water stressed areas as much of the surface water from the site is to be reused for non-potable use. This policy should reference the Defra Standards to emphasise this. The example of at least 1 water butt where feasible seems to be discouraging ambition here.). These standards are cross referenced in the PPG on Flood Risk.

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.

Replace paragraph 9 with the following. "9. Applications for new developments should demonstrate how they have made provision for rainwater harvesting to utilise as much of the surface water to the maximum extent practicable for non-potable use in accordance with Standard 1 of the National Standards for Sustainable Drainage (Defra 2025). "



Respondent No: 451

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Nicholas

Q3. Last Name Orman

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

The fails to comment on any local roads within the Wroughton growth area. Further development in Wroughton will increase traffic on B4005 and A4361. There is a longstanding road safety issue (particularly to pedestrians) due to the narrow carriageways and footways on B4005 Marlborough Road which has been recognised for many years. Increased traffic will make this worse.

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: 452

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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

[REDACTED]

[REDACTED]

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

TRAFFIC, HIGHWAYS AND ANIMAL WELFARE Horse drawn caravans (non motorised traffic) The Local Plan has not catered for four legged traffic ("non-motorised traffic). This section of the community needs to be a treated as a priority. It is a cultural way of life recognised in this country and many gypsies and non-gypsy background travellers have taken to this way of life, even if it is seasonal.. Horses (an another animal used for nomadic society or haulage) need a safe rest area, access to food, and shelter in extreme cold or wet weather. They cannot be expected to carry on for mile upon mile. Land for "wintering" should also be provided. Having noted the government expects to have "lorry rest areas" every 14 miles, it is clear they have not catered for "non-motorised traffic" that has every right to be on the road. The matter is also covered by animal welfare; a matter a local authority simply cannot ignore within its boundaries. If the government wants lorry (motorised traffic) rest areas every 14 miles or so, then it must also provide such facilities for "non-motorised traffic" (a category covered under Road Traffic Legislation and the Highway Code and other legislation) such equines or other animals pulling a cart. Road junctions must also be safe for this class of traffic. This should be provided as top priority before every inch of farmland or wide verge is covered in concrete.

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: 453

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[Redacted]

[Redacted]

[Redacted]

[Redacted]m

Q1. Title not answered

Q2. First Name Josie

Q3. Last Name Lewis

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[Redacted]

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

HOUSING PROPOSALS IN THE VILLAGE OF WROUGHTON. a) You shoved our village over the border into East Wiltshire, with no real local MP that has any close link to Wroughton or even Swindon. If you did not want Wroughton, then don't try to take our land! b) Wroughton does not need any new mass housing, nor can it cope with such a large proposed rise in residents, traffic or pressure on health facilities or schools. It is self sufficient, well run by the parish council and community groups. We do not want it crime ridden like central Swindon. c) There are circa 4,200 people on SBC's housing waiting list. Virtually none of very few of these will be allocated a home out of the 1000s you propose in the Borough. This was made clear at the Wroughton consultation and is not acceptable. Local people should be housed as a priority, before outsiders d) It was quite clear from the Consultation in Wroughton Ellendune Centre on Monday 6th October, that the host planners had little knowledge didn't really want to be there. I suspect this is because their jobs may be lost in the near future. It was clear they had little interest in Wroughton. e) What was also clear from the Wroughton consultation is the fact that SBC is desperately struggling to bypass multiple legislation that protects communities, green open space and farmland from being built on. In the circumstances, your course of action would be to refuse to comply with the ridiculous housing target central government has set. The targets can be proven to be unsustainable and detrimental to the community, farmland, open spaces and general health and wellbeing of future generations in Wroughton. SD1 It is not "effective use of land" but just eating up farmland and green open spaces. There is no evidence of provision of 3.2ha of open space per 1000 population. At the Consultation on 6th October, the hosts inferred the housing proposals would be doing the village a favour by providing "say, a children's play area". Do not try to cheat us or treat us as imbeciles, a play area is a facility you must provide by law within 5 mins walk within the 3.2 ha.

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.

Stay out of Wroughton. You did not want the village, so don't snatch our land.



Respondent No: 454

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

Q1. Title not answered

Q2. First Name Josie

Q3. Last Name Lewis

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

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

As raised at an SBC Public Meeting> Q. Regarding the Oasis / North Star land housing proposals, Who will be held responsible if any of the housing blocks collapse? The Council for approving the development, the developer or his agents/contractors, or both. I would suspect both! The land has been proven a) To be unstable, having been former GWR industrial/infill land b) Having been industrial (GWR) infill land it has been identified that the land could contain contaminants, toxins and possible combustible gas pockets. The land is therefore unsuitable for residential use. Whoever, puts their name to approving housing development at The Oasis/North Star land could be held responsible for any pre-warned risk.

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.

Please continue to refuse housing development on The Oasis.



Respondent No: 455

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[REDACTED]

Q1. Title not answered

Q2. First Name Josie

Q3. Last Name Lewis

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

Q. How many HMOs are in Swindon. Q. There is evidence crime rates increase where there are HMOs.

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.

Stop approving HMOs. You have no control who, or how many live there and they provide no sense of community. Do you actually know how many HMOs you have in the Borough?



Respondent No: 456

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[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Josie

Q3. Last Name Lewis

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

Q1. Has SBC specifically arranged a consultation event with the gypsy/traveller/travelling showman community. If so, when?
Q. What proposals are being made to update Hay Lane Caravan Site. Q. Hay Lane Caravan Site should have a green "buffer" either side of the site. This could be achieved by fields in the M4 j16, Hay Lane (B4006), Wharf Road and the new Wichelstow Road. There should also be no further industrial or housing development on the west side of the B4005. This is a protected race and culture that should be respected. Q. Why has SBC neglected this community in the past. The recent push to provide sufficient site, was not volunteered by SBC but due to legal pressure by organisations representing the gypsy community. Q. Will SBC be inviting members of the gypsy community to have a seat on the council (if it does not have one already). You have a liaison officer but no actual councillor within the Administration (regardless of party).

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.

The site does not appear to have been updated since the 1960s SBC should ensure it does not breach legislation protecting this community. It should not refer to travelling people, taking a rest break, as "encampments" It should ensure all sites such as Hay Lane meet the legal standards. A good example of this standard is the one produced by Perth & Kinross Council.



Respondent No: 457

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Q1. Title not answered

Q2. First Name Josie

Q3. Last Name Lewis

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[Redacted]

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

Dear Sirs I write regarding the proposed 1000+ new homes in Wroughton. Wroughton has no need for 1000 more homes. Secondly, Wroughton was shunted into East Wiltshire, therefore Swindon BC should not take the liberty of extending itself into the village boundaries. 1. What must be addressed is the need to cover the shortage of gypsy and travelling showman who suffer local authority failure to provide adequate permanent sites, temporary "stop over " sites and overnight stops. These are a legal requirement that both Swindon and Wiltshire has ignored for years. 2. To set a target to cover the shortage, not immediately, but by 2043 (18 yrs time), is not good enough. Particularly, when SBC Planning approve 1000s of new homes and converted urban buildings purely for non-gypsy residents and newcomers whom are referred to as "influx" by the council Leader Jim Robbins. This shows a definite bias towards Gypsy & Travelling Showpeople. 3. The absolute priority must be sites and homes to suite the culture and lifestyle of our historically and traditional families whose traditional nomadic culture and lifestyle is protected by law. There has been a shortage of sites for gypsy & traveller homes for some considerable time. Both Swindon & Wiltshire Authorities appear to have ignored or bypassed this need and some councillor(s) have been quoted as not wanting "encampments" in the area. 4. The Pipers Way park and ride could provide a stop over site with toilets and amenity buildings as would any caravan site. (note its earmarked for non-gypsy accommodation in the LP. 1. Hay Lane Caravan Site. The local authority must ensure the site is properly maintained and utilities regularly inspected, maintained and modernised as a priority. This is a permanent site under SBC's responsibility. The site has no street lighting, no kerbs etc. The site dates back to the 1960s and families have lived there for 60 years or more. Q What money has been spent on it over the last 60 years 2. The site requires a " Green Buffer " against any housing development spreading from Wichelstow, The Great Western Way and along the A3102 from Royal Wootton Bassett. There is land in the vicinity of Hay Lane to act as that buffer and this matter should be given significant consideration for its provision in the very near future. 3. It needs better screening from the M4. 4. If planning (outline or otherwise) has been granted for housing in East Wichel for non-gypsy homes perhaps, in retrospect, that permission was granted in error without considering the legally required needs of gypsy & Travellers to have an undisturbed or threatened lifestyle, prejudices or hate. 5. Childrens play areas and open spaces are being provided on non-gypsy housing estates but nothing is provided at Hay Lane, nor any land the residents could use for recreation or ad hoc ball games. 6. The lack of a safe children's play area and green open space has been brought to my attention as a local resident who recognised the needs of the gypsy and travelling showpeople. Perhaps the council could look at the G&T Site Standards drawn up by Perth & Kinross. 7. Any non-gypsy housing would significantly increase traffic flow and Gypsy & Traveller Site standards requirements state they should not be near a busy road where entering or exiting the site would be hazardous. 8. The gypsy Traveller community may wish to use the recognised legal representation to communicate through. Travelling Showmen communities may be members of the Showman's Guild which also offers guidance and legal representation.

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: 458

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Josie

Q3. Last Name Lewis

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

Dear Sirs Please find attached submissions relating to various chapters on the Local Plan. You will appreciate this is a very length document. Therefore I wish to exercise my right to comment, make observations and raise legal issues as the Local Plan continues its progress. The general public view is that local authorities are just using the public as "free consultants" and to see "if the public pick up on legislation breaches" that local authorities would be, or should be already aware of through their legal department. May I remind all councillors and parties involved in planning that they are not "to do anything that is not allowed to be done, nor,allow anything to be done that is not allowed to be done. This in simple means that, should anyone put their name to anything that is unlawful, they leave themselves open to prosecution through the Courts of England.

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: 459

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title

Mr

Q2. First Name

Owen

Q3. Last Name

Neal

Q4. Job Title (where relevant)

Planning Manager

Q5. Organisation (where relevant)

Sport England

[REDACTED]

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

The proposed policy wording sets out that ".....all other outdoor sport and play facilities are in addition to these core open space standards". It is not clear whether new development will need to provide onsite playing field or sports facilities or whether contributions will need to be made to off-site facilities

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.

Clarification as to whether new development will need to make a contribution to sport both onsite or offsite.



Respondent No: 460

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[REDACTED]

Q1. Title Mr

Q2. First Name Owen

Q3. Last Name Neal

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

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

Sport England welcomes the SP7 Healthy Living policy. Sport England has co-produced Active Design guidance with OHID (Office of Health Inequalities and Disparities). This sets out a series of design principles to support healthy and active communities. Sport England considers there is significant synergy with the healthy living policy and we would welcome reference to Sport England's Active Design guidance.

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: 461

[REDACTED]

[REDACTED]

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[REDACTED]

- Q1. Title Mr
- Q2. First Name Owen
- Q3. Last Name Neal
- Q4. Job Title (where relevant) not answered
- Q5. Organisation (where relevant) not answered

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

Sport England has co-produced with OHID (Office of Health Inequalities and Disparities) our Active Design Guidance. This is a set of design principles which outline the approach for creating and designing active and healthy places to live and work. We note that the proposed current policy wording does not refer explicitly to designing healthy places which promote physical activity at their heart. However, our Active Design guidance places "Activity for all" as a central principle, so that everyone from any background has the opportunity to be active and engage in physical activity.

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.

Sport England would welcome explicit reference to our Active Design guidance within the policy wording for High Quality Design and Inclusive Design.



Respondent No: 462

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[REDACTED]

Q1. Title

Mr

Q2. First Name

Patrick

Q3. Last Name

Herring

Q4. Job Title (where relevant)

Parish Councillor

Q5. Organisation (where relevant)

South Swindon Parish Council

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

- Where new housing is added through conversion of existing commercial buildings, the Local Plan must stress the importance of enforcing high quality designs to ensure that homes meet the requirements of Residential Design Guide SPD, or a relevant successor document. Designs must provide waste/recycling facilities and bike storage that meet the needs of residents without impacting on the area, obstructing the highway, or creating issues for existing residents and visitors. - There is a risk that a call for higher density housing may be met by development of residential HMO conversions. Many HMOs in existing terraced housing stock are low quality, frequently have issues around waste management and parking, and have a disproportionate impact on other residents in the area. Policies should limit the number of HMOs and make clear that the preference is for high quality purpose-built high-density accommodation. - Redevelopment of the Town Centre should integrate with South Swindon Parish Council's Green Trail. Redevelopment should enhance pedestrian and cycle routes generally to encourage active travel. - Developments should be mindful of the impact on the local road network and the risk of increasing traffic congestion and air pollution, and the impact that this would have on existing local residents and businesses. The Town Centre area is already prone to congestion at peak times at key bottlenecks (such as Whalebridge, Regent Circus, Station Road, and at the various railway bridges), and even developments with few or no allocated parking spaces can generate disruptive traffic (such as delivery vehicles, bin lorries, or through increased pedestrian crossing usage). It is important that congestion mitigation be given a high priority. - Redevelopment must recognise the importance of providing high quality and accessible community and sports facilities to meet the demands of a larger population. New school provision is likely to be required for the area; sites for any new school facilities should be identified and safeguarded as early as possible.

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.

- Add words to the effect of "To provide 2FE of new primary school provision in the Town Centre area".



Respondent No: 463

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Q1. Title Mr

Q2. First Name Patrick

Q3. Last Name Herring

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

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

- The Local Plan commits to creating new bus priority routes throughout the site and linking to wider transit corridors. The developers must ensure that any new or changed public transport schemes continue to take into account the needs of the existing communities in East Wichel, Rushey Platt, and Croft Road. - Wichelstowe has an extensive series of adjacent open space sites, including the meadowland to the north of East Wichel, the Wichelstowe Lakes, and the West Leaze scheduled archaeological site. Most of this area is not marked on the Policies Map as Open Space, Country Parks, or Green Infrastructure Corridors. The Local Plan and accompanying Policies Map should ensure this land is protected as public green space, prioritise measures for enhancing the area, and consider designating the area an integrated Country Park. A full Country Park in this location would benefit not only residents of Wichelstowe, but also new residents in Pipers Way and East Wroughton, and existing residents in the Croft, Old Town and Kingshill area. - Policy ST2 references a Park and Ride facility at Junction 16 of the M4. In the original Wichelstowe Masterplan, this was indicated to be in West Wichel, off Wichel Way. As this would be a key component of the public transport network through the site, this should be referenced in SGL 04.

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.

- Add to Policies Map a “country park” allocation covering the area north of East Wichel, the Wichelstowe lakes, and the scheduled monument medieval village of West Leaze. - Amend SGL 04 – 2. (f) to read “link in new bus priority routes through the site and into the wider transit corridors, including provision of a park and ride facility”
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Respondent No: 464

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- Q1. Title Mr
- Q2. First Name Patrick
- Q3. Last Name Herring
- Q4. Job Title (where relevant) not answered
- Q5. Organisation (where relevant) not answered

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

- The Local Plan should acknowledge that the Marlowe Avenue area currently contains several well-used sports and leisure amenities (including Swindon Rugby Club, Jesters Snooker Club, and Jolly Roger Soft Play), and that future masterplans for this area must wherever possible safeguard existing businesses and ensure no loss of facilities for local residents. - The Marlowe Avenue area is served by several different bus routes (the S6 via Drakes Way, the 7 via Greenbridge Retail Park, and the 2 via Greenbridge Road). The number 2 service is vital for residents in Walcot East, Covingham and Nythe, and it is important that measures to enhance bus services into the Marlowe Avenue area and to develop a transport corridor at Drakes Way do not do so at the expense of harming the bus service to these existing communities.

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: 465

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- Q1. Title Mr
- Q2. First Name Patrick
- Q3. Last Name Herring
- Q4. Job Title (where relevant) not answered
- Q5. Organisation (where relevant) not answered

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

- The Local Plan doesn't make reference to Marlborough Park phases 3 and 4, which currently proposes to add a further 286 homes to the area in addition to the 844 identified in the Local Plan. Note that this is considerably fewer, at a lower density, than was originally proposed and approved for the site. The size of the land parcels allocated for phases 3 and 4 are approximately twice as large as the footprint of Wakefield House, which has been allocated 228 dwellings in the local plan. It is important that there is a consistent view of the design and density for homes in Marlborough Park, and that the housing allocation numbers are realistic and achievable. - Former proposals for Marlborough Park included community facilities such as a pharmacy and GP surgery which have not been included in final proposals. As the most central of the sites within the proposed Pipers Way allocation, consideration should be given to the amenity needs for the new community and whether these should be included at a "village centre" area as part of the Wakefield House site. - The Parish Council operates allotments in the Pipers Way area at two existing sites. As the new communities will increase demand for allotments, consideration should be given to expanding these allotment sites. - The site allocation of the former Park & Ride has an opportunity to include a section of the restored Wilts & Berks Canal. Every effort should be made to include the restored canal in the design for the area and to follow the lead of the developments in Wichelstowe in terms of using the canal both as part of sustainable drainage and to enhance the area for new residents.

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.

- Update Site Allocation in Appendix 1 to include phases 3 & 4 of Marlborough Park, providing at least 228 homes (in line with the current proposal from the developer).
 - Update Chapter 4 – UGA 02 to 1072 new homes over the Plan Period.
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Respondent No: 466

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Q1. Title Mr

Q2. First Name Patrick

Q3. Last Name Herring

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

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

- Policies relating to Accessible House (HC3) and Tall Buildings (SD5) should make clear that all high-rise buildings should include elevators and other features necessary to accommodate wheelchair users and others with limited mobility. - I welcome the policy regarding HMOs and sub-division (HC5), however I'm concerned that the criteria for supporting HMO development are poorly defined and will be difficult in practice for the planning authority to assess and enforce. It's unclear how "meeting an identified need" or "undermining the provision of self-contained housing" would be assessed, and whether a refusal of planning permission on these grounds would be robust and secure from being overturned on appeal. I note that some councils (such as Bristol and Bath) have limited the number of HMOs to a threshold of no more than 10% of properties within a 100 metre area. It would also be positive to see the Local Plan make meeting the Council's published HMO Standards a requirement for granting planning permission.

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.

- To HC5, add 1. (f) reading "are compatible with the requirements of Swindon Borough Council's HMO Licensing Standards"
 - To HC5, add the following new points: "Within a defined area proposals for the development of houses in multiple occupation will not be permitted where the development would result in more than 10% of the total dwelling stock of the defined area being occupied as houses in multiple occupation. Within a defined area proposals for the intensification of existing houses in multiple occupation will not be permitted where 10% or more of the total dwelling stock of the defined area is already occupied as houses in multiple occupation."
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Respondent No: 467

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Q1. Title Mr

Q2. First Name Patrick

Q3. Last Name Herring

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

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

- Policies CSE3 and HL3 rightly state that where new green infrastructure is provided, arrangements must be made for its long-term management and maintenance. I believe that Parish Councils and the Borough Council are the most appropriate way to manage green infrastructure assets which can provide long term commitment and stability. I welcome that the Local Plan should make clear that local councils should be given first refusal on managing all green infrastructure and community assets. The Local Plan should also make clear that developers must engage with councils openly and early to ensure spaces are designed in a way that is in line with local councils' standards and compatible with their existing maintenance capabilities. - Policy HL4 provides a list of requirements for formal play areas. As it is usually the case that local Parish and Town Councils adopt and maintain these areas, the policy should make clear that local councils should be consulted on the design of the play areas. The policy should also specify that children's play areas should be fully enclosed by fencing where possible, in order to more effectively control prohibited behaviour such as smoking or allowing access to dogs. - Policy HL5 deals with the necessity to build appropriate community infrastructure for new developments. Some forms of community infrastructure (such as community centres and public libraries) may be appropriate to be operated by Parish and Town Councils. The policy should make clear that Parish Councils should be engaged at an early stage of producing a planning application to ensure that the size, type, and design of the local facilities meets local needs and is appropriate for operating on a sustainable ongoing basis.

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.

- In CSE3, add: "Developers should engage with Parish and Town councils, alongside the Borough council, regarding the ongoing maintenance of new green infrastructure, and developers are encouraged to offer first refusal for the ongoing maintenance of green infrastructure delivered through new residential developments to Parish and Town councils" - In HL4, add: "First refusal for the ongoing maintenance of play spaces should be offered to Parish and Town councils. Developers should consult with Parish and Town councils and local community groups in the design of these facilities to ensure they meet local needs". - In HL5 2., amend to: "Proposals of over 100 units should consult with appropriate bodies (such as the Bath and North East Somerset, Wiltshire and Swindon ICB, or any successor organisation, and Parish and Town Councils) at an early stage of preparing a planning application."



Respondent No: 468

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Q1. Title Mrs

Q2. First Name Deanne

Q3. Last Name Rose

Q4. Job Title (where relevant) Town Clerk

Q5. Organisation (where relevant) Highworth Town Council

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

Policy D1 Says D1: Developer Contributions and Viability 1. Where Local Plan requirements cannot be met by developments as a result of their viability impacts, these proposals will be expected to provide evidence of this in the form of a financial appraisal, which must be produced and independently verified at the applicants' expense. 2. If a financial appraisal demonstrates that required S106 requirements cannot viably be afforded, the Council will prioritise infrastructure as follows: I. Essential road and transport infrastructure to unlock good growth; II. Health infrastructure (including new and expanded health facilities, leisure provision and open space), where there is an identified need. III. New and expanded education facilities, where there is an identified need. IV. Affordable Housing V. Climate sustainability VI. Any other matters 3. In all cases where a S106 agreement is entered into, a Monitoring fee will be expected to form part of that agreement. 4. 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. 5. Where development is phased, 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. 6. Payments secured through planning obligations will normally be required at agreed trigger points, although some, for example monitoring fees, are paid upon signed agreement.

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.

Policy D1 Amend as follows: D1: Developer Contributions and Viability 1. In order to mitigate the impacts of development, developer contributions will be ring fenced to local infrastructure as a priority. 2. 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. 3. Where Local Plan requirements cannot be met by developments as a result of their viability impacts, these proposals will be expected to provide evidence of this in the form of a financial appraisal, which must be produced and independently verified at the applicants' expense. 4. If a financial appraisal demonstrates that required S106 requirements cannot viably be afforded, the Council will prioritise infrastructure as follows: I. Essential road and transport infrastructure to unlock good growth; II. Health infrastructure (including new and expanded health facilities, leisure provision and open space), where there is an identified need. III. New and expanded education facilities, where there is an identified need. IV. Affordable Housing V. Climate sustainability VI. Any other matters 5. Where development is phased, 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. 6. In all cases where a S106 agreement is entered into, a Monitoring fee will be expected to form part of that agreement. 7. Payments secured through planning obligations will normally be required at agreed trigger points, although some, for example monitoring fees, are paid upon signed agreement.



Respondent No: 469

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Q1. Title not answered

Q2. First Name Deanne

Q3. Last Name Rose

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

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

The Infrastructure delivery plan proposes active travel projects are assigned a delivery timescale. The cycle link proposal for the missing link from Highworth to Swindon in the LCWIP has been assigned a 3-7 year timescale. Highworth Town Council are aware without any sites coming forward in the local plan that the town is likely to experience significant growth. In order to achieve sustainable development as the majority of residents in Highworth rely on using a car this project should be brought forward. There was a huge opportunity missed with the redevelopment of the old honda site where Highworth Town Council requested monies ring fenced specifically for this project and it was ignored. Highworth Town Council have recognised the need for sustainable transport within the review of their neighbourhood plan and have explored a cycle network within the town to link to Swindon. In order to support sustainable development this policy should be fully supported. With the growth of the town this will also require the review of the bus service, the infrastructure delivery plan does not appear to consider the impact on the bus service for the future. There is a real concern that development is being promoted via the win fall route when sites have been promoted through the call for sites and emerging plan. The consequence of this approach is these sites are not being assessed strategically and not included in the infrastructure delivery plan should they come forward. Highworth Town Council are concerned that the road network will be significantly impacted by this approach and object to this approach on this basis. GP and Education provision should be linked to local housing numbers and phased delivery tied to infrastructure upgrades. The 2022 audit of burial space highlighted a need to plan for additional burial and cremation space across the borough. Highworth Town Council have included a natural burial ground in their business case for the old golf course.

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: 470

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[REDACTED]

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Q1. Title not answered

Q2. First Name Deanne

Q3. Last Name Rose

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

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

Anomalies in the outcome of the assessment of the former old golf course in Highworth. The Landscape sensitivity assessment lists site S0488 former old golf course in its entirety as being appraised. 41.22 ha. It is noted that the landscape is deemed Red meaning the following: Landscape and/or visual characteristics of the assessment unit are very susceptible to change and/or its values are high or high/medium, and it is unable to accommodate the relevant type of development without significant character change or adverse effects. Thresholds for significant change are very low. Within the SHELAA for the same site S0488 under the topic of landscape it is noted as Red meaning the following: Development likely to cause a considerable impact to landscape character, food production or open space and mitigation measures unlikely to minimise impact to an acceptable extent. It is noted that site S0488b 28 ha, is not appraised or mentioned separately in the sensitivity assessment presumably because it is a part of the whole of site S0488, although this is not mentioned and the map does not clearly identify the two sites. However, it is listed as a separate site in the SHELAA with Amber status for the landscape. The Landscape technical review comments justifying the Red status refers to the whole site as follows: Former golf course now public open greenspace which holds recreational value. PRoWs (footpaths) cross through site. Blocks of deciduous woodland and trees scattered across site. The evidence suggests that on the basis of the above both S0488 and S0488b cannot have been appraised as Amber on one site and Red on the other from a landscape perspective as both sites are designated as open space, have recreational value, have RRoWs and scattered trees. Highworth Town Council are aware of site S0488b currently being considered under a pre planning application and hope this is an oversight that Swindon Borough Council will correct and the accurate information is included in the pre application process and corrected in the documents listed above so both sites are consistent. Highworth Town Council are delighted to see that the former old golf course is not promoted as a site within the emerging plan and that national policy and Swindon Borough Councils policies within this emerging plan support this decision. Housing numbers can be achieved without this site and Highworth is already contributing with large win fall sites already in the planning process, others coming forward as well as those already being built out from sites promoted through the SHELAA. This site offers an opportunity to deliver BNG to support the growth of the Borough, to offer a unique opportunity to deliver a natural burial ground to contribute to the shortage of burial space across the Borough and a unique opportunity to offer a nature reserve supported by a robust, fully costed business plan to support the Borough's residents as we see the Borough grow.

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.

Please update the Strategic Housing and Economic Land Availability Assessment, page 52 site S0488b landscape to Red, include the evidence in the landscape sensitivity assessment document and clearly identify the sites on the strategic housing and economic land availability assessment: annex 1 map.



Respondent No: 471

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Q1. Title not answered

Q2. First Name Deanne

Q3. Last Name Rose

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

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

Policy CSE7 paragraph 2. Says 2. In meeting the above requirements, proposals must demonstrate how they have taken into account the most recent Landscape Character Assessment for the Borough, or any other adopted Landscape Studies (such as those produced by Neighbourhood Plans), and assessed the potential impact of the proposal on the following attributes of the landscape: a. existing landscape form, features, topography and character; b. the contribution of the landscape to biodiversity and wildlife; c. local geology and geo-diversity; d. views, visual amenity and the landscape setting (including views both in and out - visually sensitive skyline, geological and topographical features); e. valuable historic and heritage areas and assets; f. environmental amenity such as tranquillity & noise, pollution and light pollution; and, g. the existing social, physical, economic and environmental roles and functions of the landscape at the local and strategic scale (for example as a place of cultural and leisure activity, living, employment and separation of settlements).

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.

Policy CSE7 paragraph 2. Reword as below: 2. In meeting the above requirements, proposals must demonstrate how they have taken into account the most recent Landscape Character Assessment for the Borough, or any other adopted Landscape Studies (such as those produced by Neighbourhood Plans), and assessed the potential impact of the proposal on the following attributes of the landscape: a. existing landscape form, features, topography and character; b. the contribution of the landscape to biodiversity and wildlife; c. local geology and geo-diversity; d. views, visual amenity and the landscape setting (including views both in and out - visually sensitive skyline, geological and topographical features); e. valuable historic and heritage areas and assets; f. environmental amenity such as tranquillity & noise, pollution and light pollution; g. sports and recreational value and, h. the existing social, physical, economic and environmental roles and functions of the landscape at the local and strategic scale (for example as a place of cultural and leisure activity, living, employment and separation of settlements).



Respondent No: 472

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Deanne

Q3. Last Name Rose

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

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

The emerging document does not provide evidence to back up the policies in a lot of cases. There is very little background text which supports the policy wording. Some words in the policies are unclear too, for example what does sub analysis mean, its not in the evidence or the glossary. Nppf section 3. Plan making paragraph d) states: d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals; There is an issue with the landscape sensitivity report in that when the document is downloaded via adobe and ms word from a pdf reader some data is missing from the tables. An example of this is table 3.4 on page 12. The Infrastructure report states Highworth has a police station, this is incorrect. Foreward section – page 2 The following wording is repeated in para 1 and 3 The Local Plan will shape the houses we live in, the jobs we create, the transport we use, and the environment we share. Page 47 para 5.7 But buildings of 6-8 storeys are NOT uncommon. Page 90 para 9.1 Swindon's Local Plan plays a key role is changed to in.

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.

As above.



Respondent No: 473

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Deanne

Q3. Last Name Rose

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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[REDACTED]


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

SBC admin note: Please also 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

Representation Form

	<p style="text-align: center;">Swindon Borough Council Local Plan</p> <p style="text-align: center;">Publication Stage (Regulation 18) Draft Local Plan Representation Form</p>	<p>Ref:</p> <p>(For official use only)</p>
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By post to: Planning Policy Team, 5th Floor, Swindon Borough Council, Civic Offices, Euclid St, Swindon, SN1 2JH

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Part A

1. Personal Details*

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

Agent's Details (if applicable)

Title	<input type="text" value="MRS"/>	<input type="text"/>
First Name	<input type="text" value="DEANNE"/>	<input type="text"/>
Last Name	<input type="text" value="ROSE"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value="TOWN CLERK"/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="HIGHWORTH TOWN COUNCIL"/>	<input type="text"/>
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Council social media <input type="checkbox"/>	Local news website <input type="checkbox"/>	Local Radio <input type="checkbox"/>	Council Website <input type="checkbox"/>

Other (please specify):

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Chapter	New Policy Local Green Space	Policies Map	Update policies maps to include LGS designations across Swindon Borough	Evidence base document e.g. the Sustainability Appraisal	
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If selecting chapter, please note policy number and paragraph number if applicable.

4. COMMENTS

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

Local green space is an important and recognised land designation in the National Planning Policy Framework. It says the following in paragraphs 106-108:

106. The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period.

107. The Local Green Space designation should only be used where the green space is:

- a) in reasonably close proximity to the community it serves;
- b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
- c) local in character and is not an extensive tract of land.

108. Policies and decisions for managing development within a Local Green Space should be consistent with national policy for Green Belts set out in chapter 13 of this Framework

Highworth Neighbourhood made plan 2017 which sits within Swindon Borough has several existing designated local green spaces. It is also noted that there are other local green space designations in the Borough. In light of these designations it is important that these are included in the Swindon Local Plan. It is also noted that new designations can only occur through the review of a Local Plan and/or a Neighbourhood Plan.

In light of the above a policy for local green space should be included and the designations noted on the policies maps.

Please find below suggested wording for the policy and a copy of Highworth Neighbourhood Plans Local Green space designations on a map for inclusion in the north east policies map.

(Continue on a separate sheet /expand box if necessary)

5. CHANGES

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.

New policy

HL3: Protecting Local Green Space

The Local Green Space designation should only be used where the green space is:

- a) in reasonably close proximity to the community it serves;
- b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
- c) local in character and is not an extensive tract of land.

1. The following areas have been identified as local green space, as defined on the policies Map.

- a) Decisions for managing development within a Local Green Space should be consistent with national policy for Green Belts

Below is a map of local green spaces to be included in the North East Policies map.

Figure 13: Local Green Spaces in Highworth and Sevenhampton



(Continue on a separate sheet /expand box if necessary)

Please note in your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested change (s). You should provide succinct responses that set out the changes you suggest in a few sentences. You should not assume that if sending through significant amounts of information it will be summarised. If sending any documents through you will need to provide a summary that will be considered.



Respondent No: 474

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Deanne

Q3. Last Name Rose

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

[REDACTED]

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

Highworth Town Council fully supports a new cycle route to connect Swindon to Highworth. Highworth's Neighbourhood Plan promotes green infrastructure within Highworth and a link to Swindon. Local policies should be reflected in policy SP5 as they play an important part in helping to deliver green aspirations. Policy SP5 says at paragraph n, n) Promoting greener neighbourhoods through exploring the decarbonisation of our transport network, delivering electric car charging points, encouraging active travel and linking cycling and walking routes with the Borough's Green Infrastructure network.

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.

Paragraph 'n' should be amended to say: n) Promoting greener neighbourhoods through exploring the decarbonisation of our transport network, delivering electric car charging points, encouraging active travel and linking cycling and walking routes with the Borough's Green Infrastructure network and through local policies in made Neighbourhood Plans.



Respondent No: 475

[REDACTED]

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[REDACTED]

Q1. Title not answered

Q2. First Name Deanne

Q3. Last Name Rose

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

Policy CSE8 paragraph 2 says: 2. Planning applications should include a proposed strategy for delivering biodiversity net gain which demonstrates how the following hierarchy for delivery will be applied: a. on-site delivery; b. off-site (through allocation of biodiversity units from a new or existing registered net gain site); c. contribution in-lieu (purchase of National Credits).

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.

Policy CSE8 paragraph 2. Amend as follows: 2. Planning applications should include a proposed strategy for delivering biodiversity net gain which demonstrates how the following hierarchy for delivery will be applied: a. on-site delivery; b. off-site (through allocation of biodiversity units from a new or existing registered net gain site in the locality of development in the first instance, or in the Borough if not deliverable locally); c. contribution in-lieu (purchase of National Credits).



Respondent No: 476

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Deanne

Q3. Last Name Rose

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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[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

Representation Form

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Part B – Your representation(s). Please fill in a separate Part B sheet for each representation you wish to make.

Part A

1. Personal Details*

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

Agent's Details (if applicable)

Title	<input type="text" value="MRS"/>	<input type="text"/>
First Name	<input type="text" value="DEANNE"/>	<input type="text"/>
Last Name	<input type="text" value="ROSE"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value="TOWN CLERK"/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="HIGHWORTH TOWN COUNCIL"/>	<input type="text"/>
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E-mail Address	<input type="text" value="REDACTED"/>	<input type="text"/>

2. Request for further notification

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Yes ☒ No ☐

If you have selected yes, notifications will be sent via email where an email address has been provided.

How did you **first** find out about this consultation?

Council e-newsletter <input type="checkbox"/>	Other social media <input type="checkbox"/>	Local newspaper (printed) <input type="checkbox"/>	Don't remember <input type="checkbox"/>
Council social media <input type="checkbox"/>	Local news website <input type="checkbox"/>	Local Radio <input type="checkbox"/>	Council Website <input type="checkbox"/>

Other (please specify):

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Chapter	Policy HC1 Pg 52	Policies Map	Evidence base document e.g. the Sustainability Appraisal
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If selecting chapter, please note policy number and paragraph number if applicable.

4. COMMENTS

Please set out our comments below. Please be as precise as possible.

Policy HC1 says

1. All major residential development is required to provide balanced mixed-communities with tenures and house sizes that reflect local housing need in accordance with the latest Local Housing Needs Assessment, including sub-area analysis and in consultation with the Council's housing department based on the most up to date evidence of need at the time of application.

5. CHANGES

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.

WHAT DOES SUB AREA ANALYSIS MEAN, IT IS NOT EXPLAINED IN THE EVIDENCE BASE OF THE DOCUMENT OR THE GLOSSARY?

TO ENSURE THE POLICY IS CLEAR AS REQUIRED BY THE NPPF WE PROPOSE THE FOLLOWING CHANGE BY INCLUSION OF WORDING IN BOLD.

1. All major residential development is required to provide balanced mixed-communities with tenures and house sizes that reflect local housing need in accordance with the latest Local Housing Needs Assessment, including sub-area analysis, **policies within made Neighbourhood Plans** and in consultation with the Council's housing department based on the most up to date evidence of need at the time of application.

(Continue on a separate sheet /expand box if necessary)

Please note in your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested change (s). You should provide succinct responses that set out the changes you suggest in a few sentences. You should not assume that if sending through significant amounts of information it will be summarised. If sending any documents through you will need to provide a summary that will be considered.



Respondent No: 477

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Deanne

Q3. Last Name Rose

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

Policy HC2 paragraph 1 does not identify when affordable housing is triggered, i.e. how many units. Policies need to be clear as per the nppf. Policy HC2 paragraph 5. Says 5. Off-site contributions should enable affordable housing to be provided elsewhere in the Borough. The contribution will be based on the difference between the open market value of a dwelling and the price a Registered Provider would pay if affordable housing were provided on-site. Affordable housing on site benefits the locality of the development and therefore off site contributions should do the same, however it is recognised there may not be a suitable location so the policy needs to prioritise where monies can be used. See suggested re-wording below.

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.

5. Off-site contributions should enable affordable housing to be delivered in the local area in the first instance; or if delivery is proven not possible due to lack of a suitable site then the contributions can be used elsewhere in the Borough. The contribution will be based on the difference between the open market value of a dwelling and the price a Registered Provider would pay if affordable housing were provided on-site.



Respondent No: 478

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Deanne

Q3. Last Name Rose

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

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

HL5: Community Infrastructure – says 1. Development proposals that generate a need for community infrastructure must: a. ensure that the infrastructure, including enhancement or extension of existing infrastructure, is provided by direct provision on-site. Where clear evidence demonstrates that this cannot be achieved, a financial contribution will be taken in-lieu; b. ensure that infrastructure is operational no later than the appropriate phase of development for which it is needed; and c. set out how the long-term management and maintenance of infrastructure will be achieved

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.

HL5: Community Infrastructure – reword as below: 1. Development proposals that generate a need for community infrastructure must: a. ensure that the infrastructure, including enhancement or extension of existing infrastructure, is provided by direct provision on-site. Where clear evidence demonstrates that this cannot be achieved, a financial contribution will be taken in-lieu and ring fenced to the locality of the development to which it affects, b. ensure that infrastructure is operational no later than the appropriate phase of development for which it is needed; and c. set out how the long-term management and maintenance of infrastructure will be achieved



Respondent No: 479

[REDACTED]

[REDACTED]

[REDACTED]

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Q1. Title not answered

Q2. First Name Deanne

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Q4. Job Title (where relevant) not answered

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SBC admin note: Please also see attached response.

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How did you **first** find out about this consultation?

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Council social media <input type="checkbox"/>	Local news website <input type="checkbox"/>	Local Radio <input type="checkbox"/>	Council Website <input type="checkbox"/>

Other (please specify):

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Chapter		Policies Map	North East Policies Map – ref. open space designation.	Evidence base document e.g. the Sustainability Appraisal	
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If selecting chapter, please note policy number and paragraph number if applicable.

4. COMMENTS

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

Highworth Town Council fully supports Swindon Borough Councils correction of the Old Golf Course as open space.

Due to the need to extend the classrooms of Warneford School we wish to exclude the area highlighted in white shown in the map from open space. See maps below of change.

(Continue on a separate sheet /expand box if necessary)

5. CHANGES

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.



Please note in your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested change (s). You should provide succinct responses that set out the changes you suggest in a few sentences. You should not assume that if sending through significant amounts of information it will be summarised. If sending any documents through you will need to provide a summary that will be considered.



Respondent No: 480

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Deanne

Q3. Last Name Rose

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[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

Representation Form

 The logo features a stylized orange tree with a circular top and a vertical stem, with the text 'SWINDON BOROUGH COUNCIL' below it.	<p style="text-align: center;">Swindon Borough Council Local Plan</p> <p style="text-align: center;">Publication Stage (Regulation 18) Draft Local Plan Representation Form</p>	<p>Ref:</p> <p>(For official use only)</p>
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Please return to Swindon Borough Council by 23:59pm Monday 13th October 2025

By E-mail to: SwindonLocalPlan2043@swindon.gov.uk or

By post to: Planning Policy Team, 5th Floor, Swindon Borough Council, Civic Offices, Euclid St, Swindon, SN1 2JH

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Please note it is not possible for representations to be anonymous. Your comments and your name (and organisation/job title, if relevant), will be publicly available.

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate Part B sheet for each representation you wish to make.

Part A

1. Personal Details*

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

Agent's Details (if applicable)

Title	<input type="text" value="MRS"/>	<input type="text"/>
First Name	<input type="text" value="DEANNE"/>	<input type="text"/>
Last Name	<input type="text" value="ROSE"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value="TOWN CLERK"/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="HIGHWORTH TOWN COUNCIL"/>	<input type="text"/>
Address Line 1	<input type="text" value="REDACTED"/>	<input type="text"/>
Line 2	<input type="text" value="REDACTED"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text" value="REDACTED"/>	<input type="text"/>
Telephone Number	<input type="text" value="REDACTED"/>	<input type="text"/>
E-mail Address	<input type="text" value="REDACTED"/>	<input type="text"/>

2. Request for further notification

Do you wish to receive notifications about the progress of the Local Plan, including future consultation updates, submission of the Plan for examination and adoption of the Plan?

Yes ☒ No ☐

If you have selected yes, notifications will be sent via email where an email address has been provided.

How did you **first** find out about this consultation?

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Other (please specify):

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Chapter	Policy SD8 Historic Environment Page 44	Policies Map		Evidence base document e.g. the Sustainability Appraisal	
---------	--	-----------------	--	---	--

If selecting chapter, please note policy number and paragraph number if applicable.

4. COMMENTS

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

The policy lacks any evidence and the policy needs to be clearer. Paragraph 1 needs some additional wording, see below current and suggested.

The policy is missing enabling development so this should be added also.

The policy says

SD8: Historic Environment Heritage Assets

1. All new development must protect or enhance, and (where applicable) promote, the Borough's heritage assets.
2. Where development proposals may adversely impact upon the significance of heritage assets, great weight should be placed on the asset's conservation. Any harm or loss of significance of any designated heritage asset, including to its setting must be strongly justified
3. Proposed developments that bring harm and loss to a heritage asset will be weighed against the public benefits (including heritage benefits) of the proposal, including where appropriate, securing the long-term use of the asset representing its optimum viable use. The weighing up of harm or loss of a heritage asset and the proposal's public benefits should be considered at a level appropriate to the asset's significance and the harm caused.
4. Development proposals that appropriately enhance significance, including improving the condition of heritage assets identified on Historic England's 'Heritage At Risk' Register, will be supported. Where there is evidence of deliberate damage or neglect, the deteriorated state of the heritage asset will not be weighted in any decision.
5. The sensitive reuse of historic buildings and spaces will be supported and opportunities for the historic environment to inform and shape development and regeneration projects will be encouraged.
6. The adaptation of heritage assets in accordance with policies CSE1 and CSE2 using appropriate materials and techniques which conserve their fabric and significance will be supported.
7. Similarly, the opportunities of landscape and green blue infrastructure and biodiversity to positively respond to and enhance the significance (including setting) of heritage assets in accordance with policies CSE3 and CSE7 will be supported.

8. Proposals for the alteration of, or development (which require planning permission and/or listed building consent) affecting the historic environment must be accompanied and informed by an assessment of heritage significance and the likely impact of the proposals upon that significance.

(Continue on a separate sheet /expand box if necessary)

5. CHANGES

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.

The policy should be changed to include the areas in bold.

1. All new development must protect or enhance, and where applicable promote the Borough's **designated and non designated** heritage assets. **This includes historic buildings, conservation areas, scheduled monuments, historic parks, gardens, landscapes and archaeology.**

2. Where development proposals may adversely impact upon the significance of heritage assets, great weight should be placed on the asset's conservation. Any harm or loss of significance of any designated heritage asset, including to its setting must be strongly justified

3. Proposed developments that bring harm and loss to a heritage asset will be weighed against the public benefits (including heritage benefits) of the proposal, including where appropriate, securing the long-term use of the asset representing its optimum viable use. The weighing up of harm or loss of a heritage asset and the proposal's public benefits should be considered at a level appropriate to the asset's significance and the harm caused.

4. Development proposals that appropriately enhance significance, including improving the condition of heritage assets identified on Historic England's 'Heritage At Risk' Register, will be supported. Where there is evidence of deliberate damage or neglect, the deteriorated state of the heritage asset will not be weighted in any decision.

5. The sensitive reuse of historic buildings and spaces will be supported and opportunities for the historic environment to inform and shape development and regeneration projects will be encouraged.

6. The adaptation of heritage assets in accordance with policies CSE1 and CSE2 using appropriate materials and techniques which conserve their fabric and significance will be supported.

7. Similarly, the opportunities of landscape and green blue infrastructure and biodiversity to positively respond to and enhance the significance (including setting) of heritage assets in accordance with policies CSE3 and CSE7 will be supported.

8. Proposals for the alteration of, or development (which require planning permission and/or listed building consent) affecting the historic environment must be accompanied and informed by an assessment of heritage significance and the likely impact of the proposals upon that significance.

9. A planning application which would normally conflict with planning policies for enabling development which would secure the future conservation of a heritage asset will be considered where:

Evidence has been provided in the form of a financial viability assessment to support the need.

Where the development would secure the future conservation of a heritage asset, outweighing the disbenefits of applying the policies.

(Continue on a separate sheet /expand box if necessary)

Please note in your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested change (s). You should provide succinct responses that set out the changes you suggest in a few sentences. You should not assume that if sending through significant amounts of information it will be summarised. If sending any documents through you will need to provide a summary that will be considered.



Respondent No: 481

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Deanne

Q3. Last Name Rose

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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

SP2 says SP2: Homes for the Community 1. The Council's housing requirements, as per the most up to date standard method, is 1,205 homes per year. This equates to 24,100 new homes over the 20-year Plan period to 2043. The Council will seek to enable these targets to be met subject to all relevant policies of this Plan. Paragraph 1 needs to refer to Appendix 1 of the document and the policies maps that lists all the housing allocations. See amended wording below.

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.

1. The Council's housing requirements, as per the most up to date standard method, is 1,205 homes per year. This equates to 24,100 new homes over the 20-year Plan period to 2043. The Council will seek to enable these targets to be met subject to all relevant policies of this Plan. Site allocations to meet the housing need can be found in Appendix 1 of this document and in the policies map.



Respondent No: 482

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Deanne

Q3. Last Name Rose

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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

In Chapter 4 page 26, paragraph 4.2 last bullet point, the evidence base to policy SS1 it mentions landscapes. In the policy itself it only refers to character which are two different things in planning terms. The policy paragraph 2 last sentence should include Landscape and needs rewording as below.

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.

Rewording of paragraph 2 last sentence. 2. Supplementary growth (including minor development, service provision and infill) may be acceptable within larger villages and small villages and hamlets (as defined in Policy SS2: Settlement Hierarchy), if it is sympathetic to local character and protects and enhances local landscape.



Respondent No: 483

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Deanne

Q3. Last Name Rose

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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

The preparation and review of all policies should be underpinned by relevant and up to date evidence. Regulation 18 is the evidence gathering stage of a plan. It is evident reading all the documents that key documents are high level or incomplete. This questions the process followed and the soundness of the plan going forward. It also takes away the opportunity for the public to comment at this stage. It is clear that this draft of the plan is premature.

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: 484

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Deanne

Q3. Last Name Rose

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]

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[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

Representation Form

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Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate Part B sheet for each representation you wish to make.

Part A

1. Personal Details*

Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

Title	<input type="text" value="MRS"/>	<input type="text"/>
First Name	<input type="text" value="DEANNE"/>	<input type="text"/>
Last Name	<input type="text" value="ROSE"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value="TOWN CLERK"/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="HIGHWORTH TOWN COUNCIL"/>	<input type="text"/>
Address Line 1	<input type="text" value="REDACTED"/>	<input type="text"/>
Line 2	<input type="text" value="REDACTED"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text" value="REDACTED"/>	<input type="text"/>
Telephone Number	<input type="text" value="REDACTED"/>	<input type="text"/>
E-mail Address	<input type="text" value="REDACTED"/>	<input type="text"/>

2. Request for further notification

Do you wish to receive notifications about the progress of the Local Plan, including future consultation updates, submission of the Plan for examination and adoption of the Plan?

Yes ☒ No ☐

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How did you **first** find out about this consultation?

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Council social media <input type="checkbox"/>	Local news website <input type="checkbox"/>	Local Radio <input type="checkbox"/>	Council Website <input type="checkbox"/>

Other (please specify):

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Chapter	Figure 2 main growth areas Pg 27 Settlement boundary	Policies Map	North East policies map	Evidence base document e.g. the Sustainability Appraisal	
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If selecting chapter, please note policy number and paragraph number if applicable.

4. COMMENTS

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

Figure 2 main growth areas map page 27 – and the north east policies map.

The northern area of both maps includes the employment area in the settlement boundary when it sits on the periphery of the settlement of Highworth and is separate to the built form of housing. It is also specifically designated as employment land which is protected under policy FE2. Also the southern section of the settlement boundary for Highworth is incorrect, it should be corrected as per Highworth Town Councils neighbourhood plan figure 4 below. This is based on the settlement boundary topic paper that states development that has not started to be built out should not be included. See below correct map.

5. CHANGES

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.

Settlement boundary

Figure 4: Highworth Rural Settlement Boundary

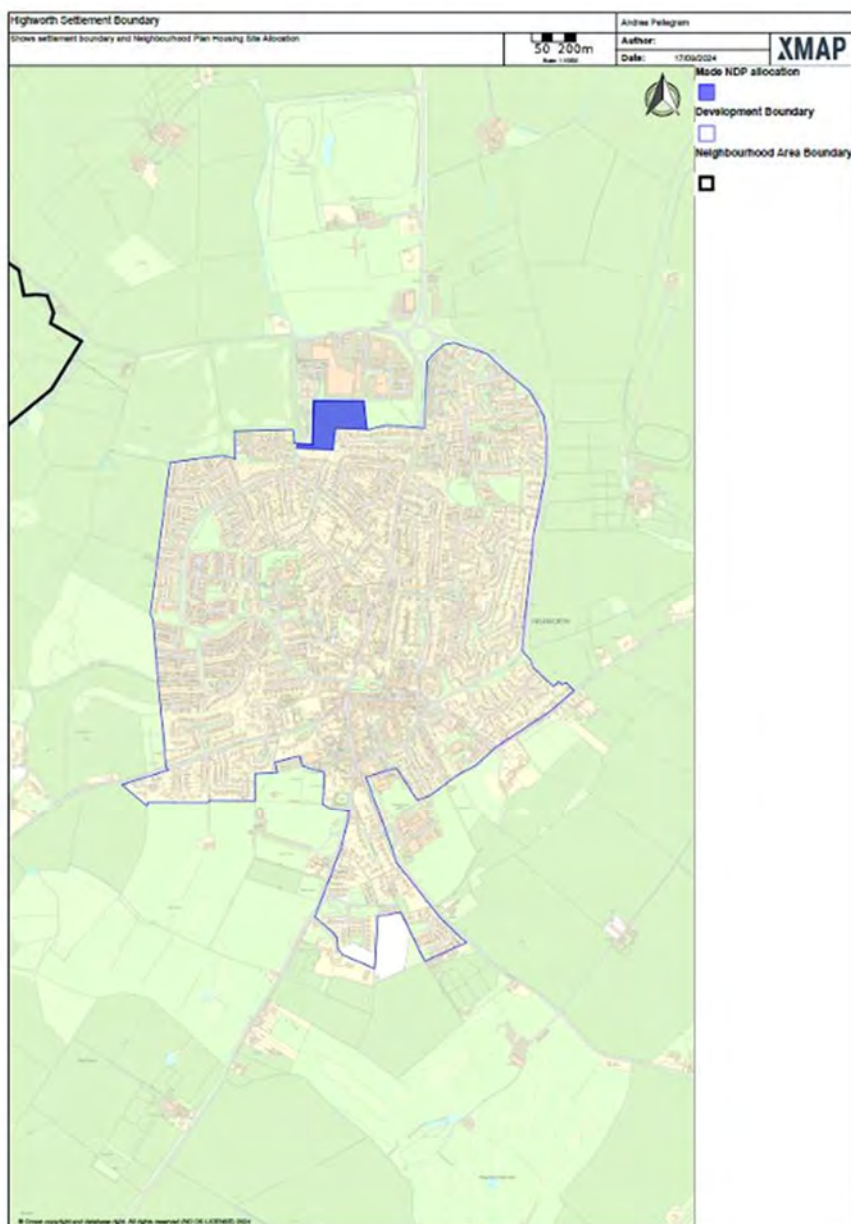
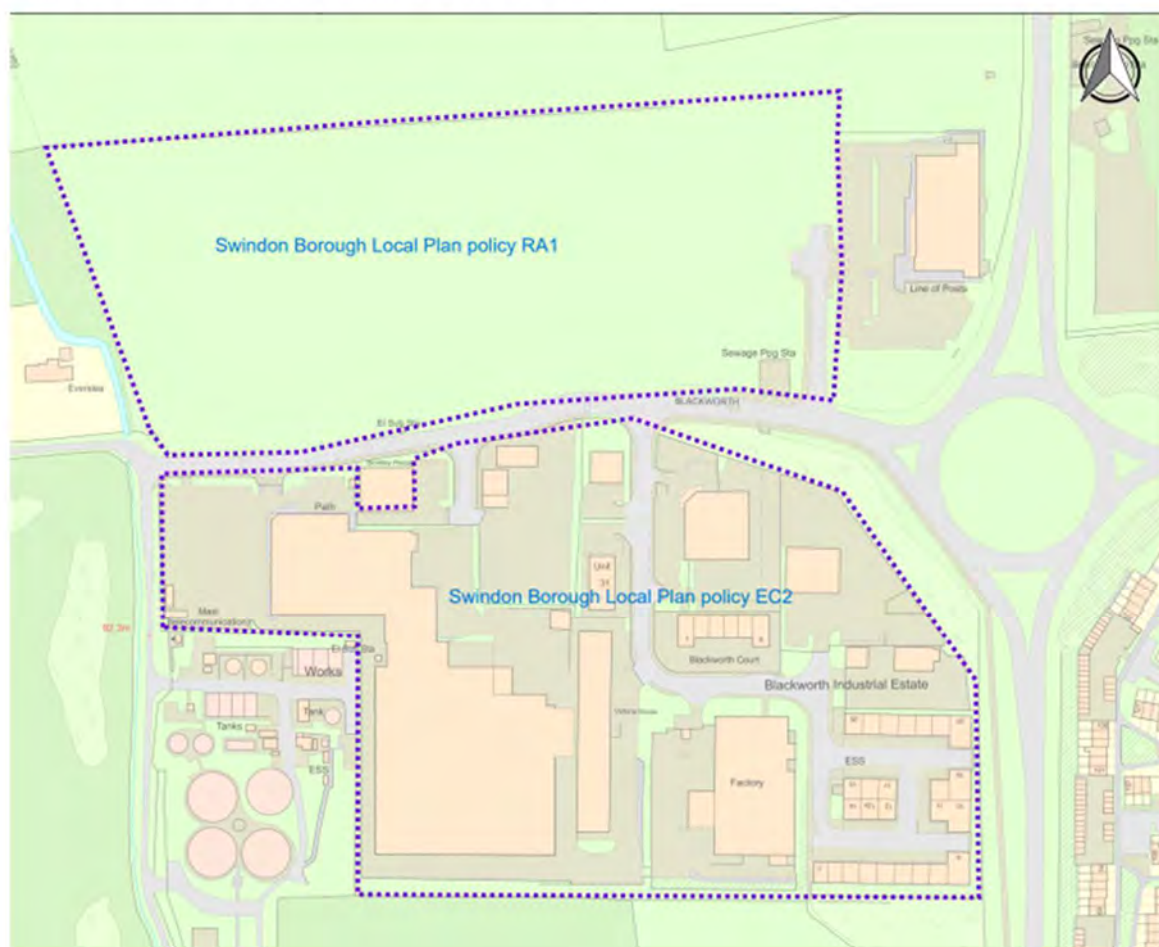


Figure 7: Designated Employment Area



(Continue on a separate sheet /expand box if necessary)

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Respondent No: 485

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title

Mr

Q2. First Name

John

Q3. Last Name

Brake

Q4. Job Title (where relevant)

not answered

Q5. Organisation (where relevant)

not answered

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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

SBC admin note: transcribed from photo submission. Wroughton is a beautiful village and already has a lot of houses built. It has now reached its capacity. To build the amount of more houses suggested by the Council would be a huge impact on all the community that live in the village. Roads Schools Doctors Surgery Drainage Bus Monday to Friday every four hours to hospital – very difficult. The parking in the Ellendune is filled to capacity everyday. We do not know who uses the carparks. Is it used as a park and ride? We live in a green area. Why not use the brown sites which are available around Swindon. Why are you not building in Chiseldon? Our surrounding countryside is stunning. Still maintaining wildlife and trees. Already you have allowed Alexandra Park to be built and Halcrow's beautiful site is now covered with large houses. You own the farms around Wroughton area and have already dictated that they have now been given one year leases. What are your plans for our farming fields? More houses or perhaps industrial units. We have one main road through Wroughton and one road that goes to West Swindon and Wichelstowe. How do you think Swindon Road can cope with a further 2000 cars or more. It struggles to cope with the school buses am and pm. There is no parking spaces available at this hugely busy times. It has become quite dangerous for pedestrians and children as there is so many vehicles. Wichelstowe is still building a massive amount of houses. It is not a very attractive area now with a lot of flats being built. The development has not been well designed. It feels very claustrophobic. Is this not enough houses near Wroughton to suffice. If houses are built in Wroughton they cannot be taken down. Our future to maintain our beautiful village is in the council and Parliaments hands. It is so important that we are not swallowed up with more huge amounts of houses being built. We love being a village with room to breathe. SBC admin note: late submission Hello Here is the evidence for no parking spaces for the local community in Wroughton. This is a daily occurrence. Obviously used for park and ride into Swindon. What would happen if you allowed more houses in Wroughton to be built. 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









Respondent No: 486

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title

Mr

Q2. First Name

Phil

Q3. Last Name

Jones

Q4. Job Title (where relevant)

Director, Head of Planning South West

Q5. Organisation (where relevant)

Turley on behalf of Vygon (UK) Ltd

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[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.

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not answered

Representation Form

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(SwindonLocalPlan2043@swindon.gov.uk) or in writing: Planning Policy Team, 5th Floor, Swindon Borough Council, Civic Offices, Euclid St, Swindon SN1 2JH. For further information on how your data is handled please visit

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Part B – Your representation(s). Please fill in a separate Part B sheet for each representation you wish to make.

Part A

1. Personal Details*

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

Agent's Details (if applicable)

Title	<input type="text"/>	<input type="text" value="Mr"/>
First Name	<input type="text"/>	<input type="text" value="Phil"/>
Last Name	<input type="text"/>	<input type="text" value="Jones"/>
Job Title	<input type="text"/>	<input type="text" value="Director, Head of Planning South West"/>
(where relevant)		
Organisation	<input type="text" value="Vygon (UK) Ltd"/>	<input type="text" value="Turley"/>
(where relevant)		
Address Line 1	<input type="text"/>	<input type="text"/>
Line 2	<input type="text"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text"/>
Telephone Number	<input type="text" value="c/o agent"/>	<input type="text"/>
E-mail Address	<input type="text" value="c/o agent"/>	<input type="text"/>

2. Request for further notification

Do you wish to receive notifications about the progress of the Local Plan, including future consultation updates, submission of the Plan for examination and adoption of the Plan?

Yes ☒ No ☐

If you have selected yes, notifications will be sent via email where an email address has been provided.

How did you **first** find out about this consultation?

Council e-newsletter <input type="checkbox"/>	Other social media <input type="checkbox"/>	Local newspaper (printed) <input type="checkbox"/>	Don't remember <input type="checkbox"/>
Council social media <input type="checkbox"/>	Local news website <input type="checkbox"/>	Local Radio <input type="checkbox"/>	Council Website <input checked="" type="checkbox"/>

Other (please specify):

Part B – Please use a separate sheet for each representation

Name or Organisation: Turley on behalf of Vygon (UK) Ltd

3. To which part of the Local Plan does this representation relate?

Chapter	Chapter 5 (Sustainable, High Quality Development), Policy SS1 (Swindon's Spatial Approach to Growth)	Policies Map	Yes	Evidence base document e.g. the Sustainability Appraisal	N/A
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If selecting chapter, please note policy number and paragraph number if applicable.

4. COMMENTS

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

Emerging Policy SS1 sets out the proposed overarching spatial approach to housing, commercial and industrial growth and supporting infrastructure for Swindon. The policy identifies the specific locations proposed to be the main focus for this growth including within Swindon Urban Area Sustainable Development Locations (including the town centre, Strategic Growth Location, Urban District Centres, Urban Regeneration Areas and along key public transport corridors), for employment uses within Industrial Locations and at Strategic Growth Locations.

Vygon fully supports the identification of locations within Swindon's Urban Area located along key public transport corridors as being appropriate to accommodate new development and growth. Vygon's land is located just off the A4198 (Thamesdown Drive) and is served by existing bus stops along Salzgitter Drive, which provide direct connection into the town centre and to the nearby Orbital Shopping Park. Furthermore, the site is within a 5 minute walk from existing services along Latham Road including the Aldi supermarket, David Lloyd gym and restaurants. It is clear that the site is within a highly sustainable location as defined at emerging Policy SS1 and where development (of both housing and employment uses) are wholly appropriate.

The emerging policy supports the principle of employment uses being within the proposed designated Industrial Locations. We consider that the Local Plan should accord with the principles at Paragraph 86 of the NPPF which require planning policies to be *"flexible enough to accommodate needs not anticipated in the plan, and allow for new and flexible working practices and spaces to enable a rapid response to changes in economic circumstances."* Opportunities for sustainable

mixed-use development in all appropriate locations, such as on Vygon's land, should be acknowledged in accordance with the provisions of national planning policy.

The new Local Plan should positively plan for new residential development alongside economic development in sustainable locations, to ensure that local needs can be met and that existing businesses are supported and able to remain. We set out further comments in relation to the dedicated Industrial Locations policy and why we consider Vygon's land is wholly appropriate for a mix of uses other than 'industrial' uses (including residential development alongside its proposed replacement HQ facility).

(Continue on a separate sheet /expand box if necessary)

5. CHANGES

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.

We consider that the policy should be amended to recognise and plan for sustainable growth and mixed-used development opportunities (including for residential) within designated Industrial Locations, where appropriate and evidenced. This would align with the principles of National Planning Policy which seek to ensure that planning policies are flexible to accommodate new and flexible working practices and to respond to changes in economic circumstances.

Accordingly, we consider the following amendments to the policy wording should be made:

"The main focus for housing, commercial and industrial growth for Swindon, including most of its supporting infrastructure, services and facilities, is illustrated on Figure 2 and will be:

a) within Swindon Urban Area Sustainable Development Locations, (as designated on the Policies Map), which are:

- 1. Swindon Town Centre and the wider 'Central Area' Strategic Growth Location;*
- 2. Urban District Centres;*
- 3. Urban Regeneration Areas (including Pipers Way and Marlowe Avenue);*
- 4. and along key public transport corridors;*

b) for employment uses only, to designated Industrial Locations (particularly for light industrial, industrial, warehousing and distribution) unless there is clear evidence to justify alternative non-employment uses;

c) the Strategic Growth Locations of New Eastern Villages, Wichelstowe, Kingsdown, East Wroughton and North Tadpole."

(Continue on a separate sheet /expand box if necessary)

Please note in your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested change (s). You should provide succinct responses that set out the changes you suggest in a few sentences. You should not assume that if sending through significant amounts of information it will be summarised. If sending any documents through you will need to provide a summary that will be considered.

Part B – Please use a separate sheet for each representation

Name or Organisation: Turley on behalf of Vygon (UK) Ltd

3. To which part of the Local Plan does this representation relate?

Chapter	Chapter 5 (Sustainable High Quality Development) , Policy SP1 (Sustainable Development)	Policies Map	N/A	Evidence base document e.g. the Sustainability Appraisal	N/A
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If selecting chapter, please note policy number and paragraph number if applicable.

4. COMMENTS

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

Policy SP1 sets out the Council's overarching strategy for delivering high quality, sustainably designed development. The overarching objectives and principles set out are supported. The need and benefits of providing a sustainable development which incorporates high quality design, respects the local heritage, and improves active lifestyle is well understood.

It is also understood that Swindon sits in an area of severe water stress, and the need for liaison with Thames Water is understood, as is the need to secure energy capacity. We would note that connection capacity may be conditional on timescales set out by Thames Water and 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, consideration should be given to connection agreements and timescales provided by Thames Water and SSEN.

(Continue on a separate sheet /expand box if necessary)

5. CHANGES

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.

- In this context a small amendment to section 4 is proposed:
 - *"4. The approval of new development will be conditional on the appropriate water infrastructure and energy capacity being ~~in place~~ secured. Developers should engage with Thames Water and SSEN (Scottish and Southern Electricity Networks) early in the planning process in line with Policies U1 and U2."*

(Continue on a separate sheet /expand box if necessary)

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Part B – Please use a separate sheet for each representation

Name or Organisation: Turley on behalf of Vygon (UK) Ltd

3. To which part of the Local Plan does this representation relate?

Chapter	Chapter 5, Policy SD1 (Effective Use of Land)	Policies Map		Evidence base document e.g. the Sustainability Appraisal	
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If selecting chapter, please note policy number and paragraph number if applicable.

4. COMMENTS

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

Vygon supports the principle of emerging Policy SD1, which encourages development proposals to make effective use of land through optimising density whilst being sympathetic to the surrounding environment.

The emerging Policy sets out that proposals for employment uses should demonstrate how they have sought to intensify floorspace capacity. Vygon's proposal to develop a new bespoke HQ facility is wholly consistent with this emerging policy. The intention is for their business space to be modernised and adapted through the optimisation of its facilities and the provision of more efficient space. This will in turn intensify the floorspace capacity within the new building, compared to the existing premises which comprises large areas of redundant space.

Vygon's development proposals seek to make the most effective use of the site through the intensification of employment uses within its new facility. Vygon is anticipating investing over £10 million in the new HQ facility to ensure it can remain within Swindon. The delivery of new homes on the remaining surplus land will not only ensure the most efficient use of land in accordance with the emerging Local Plan and national planning policy; it will also generate a land receipt and in turn enable Vygon to make such a significant investment.

Vygon intends to deliver its new facility within the southern part of the site, close to existing commercial uses in the vicinity within Gateway North, and suitably located between the A4198 Thamesdown Drive to the south and the proposed residential land to the north. The proposed residential development is intended to come forward on the remaining northern part of the site. This aligns with the residential proposals immediately to the north (the Homes England site) and the wider existing, residential areas to the west. This would demonstrate a wholly optimised and efficient use of the site, whilst ensuring it is sympathetic to the surrounding environment in accordance with emerging Policy SD1.

(Continue on a separate sheet /expand box if necessary)

5. CHANGES

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.

In order to ensure that the Plan is positively prepared, in a way that is aspirational but deliverable, we consider that the policy wording should be amended to acknowledge that when assessing whether employment uses make an effective use of land that this should take account of local business needs and wider opportunities for development in accordance with the Framework. Accordingly, the policy should be amended to state "*proposals for employment uses should demonstrate how they have sought to intensify floorspace capacity where possible, as well as taking into account local business needs and wider opportunities for efficient and effective use of land, including development.*"

(Continue on a separate sheet /expand box if necessary)

Please note in your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested change (s). You should provide succinct responses that set out the changes you suggest in a few sentences. You should not assume that if sending through significant amounts of information it will be summarised. If sending any documents through you will need to provide a summary that will be considered.

Part B – Please use a separate sheet for each representation

Name or Organisation: Turley on behalf of Vygon (UK) Ltd

3. To which part of the Local Plan does this representation relate?

Chapter	Chapter 6 (Places for People), Policy SP2 (Homes for the Community)	Policies Map		Evidence base document e.g. the Sustainability Appraisal	
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If selecting chapter, please note policy number and paragraph number if applicable.

4. COMMENTS

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

The emerging Local Plan sets out that the housing requirement calculated against the most up to date standard method is 1,205 homes per annum, a total of 24,100 homes over the 20-year plan period.

Turley has conducted a technical review of the emerging approach towards housing provision in Swindon, as set out in the draft Plan, to ascertain whether this is likely to meet both the overall need for housing and the specific need for affordable housing. This technical review is appended to the fully copy of our representations report enclosed.

This review 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.

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).

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.

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.

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

To ensure the emerging Local Plan is positively prepared and to help contribute to housing supply, the Council should maximise opportunities to allocate sites for development in sustainable locations. The development opportunity on Vygon's land would deliver in the region of 300 new homes and make a meaningful contribution to meeting housing needs within Swindon. The site is available for development and deliverable within the first half of the plan period.

(Continue on a separate sheet /expand box if necessary)

5. CHANGES

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.

We consider that the emerging Local Plan and Policy SS2 should be updated to reflect a higher benchmark for housing growth, more reflective of the future need in Swindon. In order to boost the delivery of new homes and the standard method figure should be considered the minimum.

Additional sites should be allocated for housing development. As set out within our detailed comments to emerging Policy FE2, Vygon's land represents a highly sustainable and deliverable residential development opportunity and should therefore be allocated in order to help meet Swindon's housing needs within the first half of the plan period.

(Continue on a separate sheet /expand box if necessary)

Please note in your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested change (s). You should provide succinct responses that set out the changes you suggest in a few sentences. You should not assume that if sending through significant amounts of information it will be summarised. If sending any documents through you will need to provide a summary that will be considered.

Part B – Please use a separate sheet for each representation

Name or Organisation: Turley on behalf of Vygon (UK) Ltd

3. To which part of the Local Plan does this representation relate?

Chapter	Chapter 7 (An Economically Thriving Swindon), Policy FE2 (Industrial Land – Scale and Location)	Policies Map	Yes	Evidence base document e.g. the Sustainability Appraisal	Yes – Strategic Housing and Economic Land Availability Assessment (2025), and Employment Needs and Land Supply Assessment (2025).
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If selecting chapter, please note policy number and paragraph number if applicable.

4. COMMENTS

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

Emerging Policy FE2 relates to the industrial and warehousing uses, including the provision of new space and existing industrial land. It proposes that within designated Industrial Locations, industrial activities (including light industrial, heavy industrial and warehousing and distribution uses) will be permitted and safeguarded.

The emerging policy includes limited flexibility for other (non-industrial) activities in certain specific circumstances. It states that Sui Generis development that aligns with the industrial purpose of the area would normally be supported, as well as the temporary use of empty buildings and vacant sites for a period of no more than three years and where this would help rejuvenate the industrial area. As drafted, the policy is highly restrictive of land uses outside of these circumstances and would not allow residential development to come forwards as proposed in these representations.

A wider parcel of land at Gateway North, including Vygon's land interests, is proposed to be designated as an Industrial Location. This is understood to broadly reflect the role of the existing policy designation for Key Employment Areas via Policy EC2 of the adopted Local Plan (2015). The land outlined in black to the east is additional land, not previously designated, now proposed to be designated as an Industrial Location. The emerging Local Plan identifies other locations in the Borough as 'Mixed-Use Transitional Industrial Location' sites, however Vygon's site is not included within this designation.

Vygon disagrees with the proposed allocation of the site for purely industrial purposes. The current planning permission for the site (ref. S/09/1817) is for Use Classes B1a (offices – now Use Class E), B1b (research and development

now Use Class E) and B8 (warehousing). Therefore Vygon's existing operational use does not wholly reflect an 'industrial use' as defined by the emerging designation.

National planning policy is clear that the planning system should create conditions within which businesses can invest and adapt, as well as promoting the effective use of land to meet housing and other needs. The proposed redevelopment of Vygon's land will enable it to adapt to its business needs, providing a new tailored facility and retaining existing jobs on-site, alongside providing new homes on brownfield land. This should be afforded significant weight. The new Local Plan should be positively prepared to support this suitable, available and deliverable sustainable development opportunity.

Vygon is committed to retaining its existing operations on-site and within Swindon. The decision to redevelop a new facility in this location has been informed by a comprehensive business case (informed by much of Vygon's existing workforce being based locally) and a robust site-search and assessment of alternative sites in Swindon. The conclusion of this exercise was that there are few deliverable land or property opportunities available in the current market which would provide a material improvement to what can be achieved on Vygon's existing site at Gateway North. Therefore, the decision for Vygon to invest in its existing site is most optimal for Vygon's operations.

Vygon's vision for the new purpose-built facility is to co-locate a number of assembly lines and to develop a functional and flexible warehouse space. Office, training and research space will be provided alongside that, with appropriate staff welfare facilities. This mirrors the existing types of uses on site. The new purpose-built facility will extend to approximately 5,500 sqm, reduced from the current building's 13,525 sqm footprint. This is due to the proposed consolidation of Vygon's assembly line and overall improved operational efficiencies. In particular, the existing building provides far too much office space for Vygon's needs and the lack of interest following marketing of the space has demonstrated there is no evidence of market demand for the office space. The existing building was originally developed for Motorola and the premises have been surplus to Vygon's requirements since they occupied the building in 2011, with that becoming more apparent with changing working practices. Owing to various factors including more flexible working arrangements, a significant proportion of the office space within the existing building is now vacant. Marketing of the premises has largely been unsuccessful. Accordingly, the proposed demolition of the existing building and provision of a new replacement facility is considered to be essential for commercial reasons.

The proposed development will not result in any reduced level of operations or overall employment (with the current facility supporting approximately 75 jobs). Vygon anticipates there may be a very slight reduction to supporting cleaning and servicing staff numbers as a result of the reduced premises, however this will be balanced with additional jobs created through the construction period. There is no planned reduction in more highly skilled workers based at the site.

Owing to the proposed consolidation of operational spaces within Vygon's new facility, this will result in surplus land being made available on-site. The disposal of this land is fundamental to enable Vygon to remain on-site and to fund the c. £10-£14 million upfront investment development in its new premises. For the reasons set out below, the surplus land is wholly suitable for residential development with a capacity for approximately 300 homes:

The site is within a highly sustainable location within the defined Urban Area of Swindon and where sustainable travel opportunities can be maximised in accordance with the provisions of emerging Policy SS1.

The surrounding area is defined by a mix of residential, commercial, leisure, and retail uses. The site is served by existing pedestrian connections to Latham Road to the east, which provides direct and safe access to the local services and amenities including the David Lloyd Leisure Centre, ALDI supermarket and restaurants. These existing amenities are all located within a 5-minute walk from the site and are wholly complimentary to the proposed residential development of the site.

There are wider connections to existing Public Rights of Way and cycle and pedestrian infrastructure within immediate proximity. These provide access to onward routes into the surrounding areas via existing pedestrian and cycle infrastructure including to the Abbey Stadium, other residential areas, and key local facilities including the Orbital Shopping Park and community routes to Swindon town centre. There are existing bus stops located along Salzgitter Drive which serve the Vygon site.

The proposed residential development is intended to come forward on the northern part of the site. This aligns with the emerging residential proposals immediately to the north and would align with the wider existing, residential areas to the west.

Vygon has appointed a technical consultant team who are progressing detailed assessment of the site to inform the emerging development proposals. Initial technical work has concluded that there are no fundamental environmental or technical constraints which would preclude the proposed development. This analysis has included assessment of the following considerations:

The proposed mixed-use employment and residential development is wholly compatible with surrounding uses (as set out above).

The site is located entirely within Flood Zone 1. There is sufficient space within the site to deliver new Sustainable Drainage solutions and to mitigate any small pockets at risk of surface water flooding.

Preliminary ecological assessment work has concluded that the areas of highest ecological value are the dense trees belts along the site boundaries. These are being retained by the development proposals wherever possible. Protected species surveys have been completed or are underway.

There is sufficient space on-site to provide high quality open and amenity space to serve both the new employment (Vygon) facility and new residential development. Opportunities to achieve 10% statutory Biodiversity Net Gain on-site are being explored as part of the detailed design work.

The site benefits from two existing vehicle access points to the west via Salzgitter Drive and to the east via Latham Road respectively. Both options are available as part of any redevelopment proposals, which creates flexibility as the proposals progress and more detailed consideration is given to how best to achieve the optimal accessibility and highways outcomes.

Fundamentally, there are no technical issues or constraints which would restrict high-quality, sustainable development proposals from coming forward. Vygon is

undertaking a separate pre-application enquiry with the Council which demonstrates further details of the technical work that is being conducted and that the site is suitable for development.

Vygon raises concern with the wording of Policy FE2 as currently drafted. Particularly noting the omission of any opportunity for alternative development uses to be considered, even where there is evidence to justify this and existing employment would be retained. This is in conflict with paragraph 85 of the Framework and the Planning Practice Guidance¹.

The relevant policy within the adopted Swindon Local Plan (Policy EC2) relates to Key Employment Areas (which Vygon's land is currently designated as) and includes provision for alternative, non-employment uses to be accepted subject to clear evidence and justification. Vygon's new operational facility would be supported by adopted employment land policy, and evidence is being prepared to demonstrate that the proposed residential development would meet the criteria required to justify alternative uses. This includes that marketing has demonstrated a lack of interest in the existing buildings, and that there will be no overall reduction to employment opportunities.

Vygon disagrees with the policy wording in emerging Policy FE2, which does not include the same provision for alternative non-employment uses to be accepted where justified by clear evidence. The approach is inconsistent with national planning policy², which encourages *multiple benefits* from urban and rural land including mixed use schemes and promotes the development of under-utilised land and buildings, *especially* if this would help to meet identified needs for housing where land supply is constrained and land could be used more effectively. The opportunity for redevelopment at Vygon's site is wholly consistent with the principles of sustainable development set out in national planning policy. These principles should be reflected within the emerging Policy wording.

The Council's evidence base includes an Employment Needs and Land Supply Study (March 2025). Paragraph 1.61 of the Study states that "*certain identified areas of employment land could be released for other uses in times, although support should be given to existing occupiers on these sites.*" At paragraph 1.64 the Study emphasises the importance of collaboration between Swindon Council, businesses and other stakeholders as key to economic success. Vygon supports the recommendations within this Study, acknowledging that there are areas of employment that will need to be released for other uses particularly where existing occupiers are supported on site. The proposed development on Vygon's land would enable the retention of this key local employer on-site. Vygon is keen to collaborate with the Council to ensure that economic successes can be achieved by enabling development which supports it to stay on-site and to retain jobs, alongside provision of new homes.

Vygon's land interests are not assessed within the Strategic Housing Land Availability Assessment (2025) published as part of the evidence base. However the land immediately to the north (ref. S0401 Land North of Latham Road) is assessed as being suitable for development, with positive assessment made in particular with regard to heritage, landscape, archaeology and ecological considerations. The findings indicate the site is '*particularly*' suitable for *employment uses*, however Vygon considers that this site to the north and it's land interests immediately south of this are wholly suitable for mixed-use or residential development.

Vygon's land at Gateway North represents an optimal location for a new, consolidated replacement facility for its employment uses alongside residential development. The proposals will:

Enable Vygon, a key local employer, to remain on-site. This will retain existing jobs in Swindon and enable the development of a more modern and sustainable HQ facility tailored to meet the needs of the business and secure their long-term future in Swindon.

Secure a substantial investment in Vygon's new HQ facility (currently projected to be in the region of up to £14m), with benefits flowing to the local construction economy. Securing their long term presence in Swindon will deliver very significant economic benefits over the course of many years, supporting the local and regional economy.

Meet local housing needs within a highly sustainable location within Swindon's defined Urban Area and adjacent to existing residential areas (including a development site subject to a pending planning application being progressed by Homes England immediately to the north). The opportunity to provide up to 300 new homes on-site presents significant merits in light of a housing shortfall and support the delivery of the Council's emerging Local Plan.

Enable Vygon to invest in their continuing presence in Swindon. The strategy is dependent on the proceeds from the disposal of the surplus land funding the construction of Vygon's new HQ facility to support its long-term aspiration to stay within Swindon. A comprehensive approach to the redevelopment of the site is required to realise this aspiration.

The site is suitable for the proposed mixed-use development owing to its highly sustainable location and lack of any site-specific constraints that cannot be appropriately mitigated. Vygon is the freehold landowner, and it intends to retain ownership of its new facility in perpetuity. The proposed residential land is available for development and is deliverable within the short-medium term and can therefore be included in the Local Plan period housing trajectory. Vygon is committed to investing in the delivery of a new facility as quickly as possible and promoting the opportunity for residential development on the surplus land available.

(Continue on a separate sheet /expand box if necessary)

5. CHANGES

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.

In order to progress a Sound Local Plan, our recommendations are as follows:

- Ultimately, Vygon considers that a bespoke allocation policy should be included within the Local Plan to enable the proposed mixed-use residential and employment development on its land at Gateway North. Such an allocation would be entirely justified, supported by a considerable weight of evidence on need, and would deliver significant economic and social benefits for the Borough. This would ensure that the Plan is positively prepared in a way that is deliverable.

- Secondly, we would request that text be inserted to Policy FE2 to enable the change of use or alternative (non-industrial) uses to be supported where there is clear and robust evidence which supports this. In particular where there will be no direct reduction to the existing number of jobs provided on-site and where other needs (in particular housing) can be met alongside employment. New job opportunities would also be created in the construction period for both the residential and employment elements. This would support the provisions of sustainable development and effective use of land, in accordance with national planning policy.

(Continue on a separate sheet /expand box if necessary)

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Part B – Please use a separate sheet for each representation

Name or Organisation: Turley on behalf of Vygon (UK) Ltd

3. To which part of the Local Plan does this representation relate?

Chapter	Chapter 9 (An Environmentally Sustainable Swindon), Policy SP6 (Climate Stability and the Environment)	Policies Map		Evidence base document e.g. the Sustainability Appraisal	
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If selecting chapter, please note policy number and paragraph number if applicable.

4. COMMENTS

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

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.

(Continue on a separate sheet /expand box if necessary)

5. CHANGES

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.

N/A.

(Continue on a separate sheet /expand box if necessary)

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Part B – Please use a separate sheet for each representation

Name or Organisation: Turley on behalf of Vygon (UK) Ltd

3. To which part of the Local Plan does this representation relate?

Chapter	Chapter 9 (An Environmentally Sustainable Swindon), Policy CS1 (Carbon Reduction and Sustainable Design in New Development)		Evidence base document e.g. the Sustainability Appraisal	
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If selecting chapter, please note policy number and paragraph number if applicable.

4. COMMENTS

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

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.

(Continue on a separate sheet /expand box if necessary)

5. CHANGES

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.

The following amendments to the Policy are recommended:

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.*

(Continue on a separate sheet /expand box if necessary)

Please note in your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested change (s). You should provide succinct responses that set out the changes you suggest in a few sentences. You should not assume that if sending through significant amounts of information it will be summarised. If sending any documents through you will need to provide a summary that will be considered.

Part B – Please use a separate sheet for each representation

Name or Organisation: Turley on behalf of Vygon (UK) Ltd

3. To which part of the Local Plan does this representation relate?

Chapter	Chapter 9 (An Environmentally Sustainable Swindon), Policy CSE2 (Whole Life Carbon Assessments)	Policies Map		Evidence base document e.g. the Sustainability Appraisal	
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If selecting chapter, please note policy number and paragraph number if applicable.

4. COMMENTS

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

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, in relation to residential development, 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.

The Local Plan should acknowledge that where existing buildings are no longer fit for purpose, there are significant opportunities for improved energy efficiency and overall sustainability performance through new build development. The existing buildings on site, occupied by Vygon, are dated and perform poorly in terms of operational energy efficiency. The buildings were constructed to meet another business's needs to a specific brief, using mechanical and electrical plant of its time. That plant and equipment is now

highly inefficient compared to modern standards and requires significant maintenance upkeep. The running costs of the building are very high and the operational carbon emissions are also high. The costs of adapting and retrofitting the buildings present significant challenges and would not be economically feasible. A new HQ building for Vygon would be constructed to high standards of design with the aim of significantly reducing carbon emissions in construction and operation, which could be demonstrated through a WLCA as part of a full planning application submission.

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.

(Continue on a separate sheet /expand box if necessary)

5. CHANGES

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.

As noted above some minor amendments are proposed to this policy:

- 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*

(Continue on a separate sheet /expand box if necessary)

Please note in your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested change (s). You should provide succinct responses that set out the changes you suggest in a few sentences. You should not assume that if sending through significant amounts of information it will be summarised. If sending any documents through you will need to provide a summary that will be considered.

Part B – Please use a separate sheet for each representation

Name or Organisation: Turley on behalf of Vygon (UK) Ltd

3. To which part of the Local Plan does this representation relate?

Chapter	Chapter 10 (A Healthy, Socially Connected Swindon) Policy U1 (Wastewater, Sewage Infrastructure and Water Supply)	Policies Map		Evidence base document e.g. the Sustainability Appraisal	
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If selecting chapter, please note policy number and paragraph number if applicable.

4. COMMENTS

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

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.

(Continue on a separate sheet /expand box if necessary)

5. CHANGES

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.

In this context we would recommend the following amendments:

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.~~

(Continue on a separate sheet /expand box if necessary)

Please note in your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested change (s). You should provide succinct responses that set out the changes you suggest in a few sentences. You should not assume that if sending through significant amounts of information it will be summarised. If sending any documents through you will need to provide a summary that will be considered.

Part B – Please use a separate sheet for each representation

Name or Organisation: Turley on behalf of Vygon (UK) Ltd

3. To which part of the Local Plan does this representation relate?

Chapter	Chapter 10 (A Healthy, Socially Connected Swindon) Policy U3 (Energy Networks)	Policies Map		Evidence base document e.g. the Sustainability Appraisal	
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If selecting chapter, please note policy number and paragraph number if applicable.

4. COMMENTS

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

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.

(Continue on a separate sheet /expand box if necessary)

5. CHANGES

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.

N/A.

(Continue on a separate sheet /expand box if necessary)

Please note in your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested change (s). You should provide

succinct responses that set out the changes you suggest in a few sentences. You should not assume that if sending through significant amounts of information it will be summarised. If sending any documents through you will need to provide a summary that will be considered.

Swindon Local Plan (Regulation 18) Consultation

Representations on behalf of Vygon (UK) Ltd

October 2025

Turley

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Contact

Phil Jones



Laura Eimermann



October 2025

Executive Summary

1. The enclosed representations are prepared by Turley on behalf of Vygon (UK) Ltd to the Swindon Draft Local Plan 2043 (Regulation 18) Consultation.
2. Vygon (UK) Ltd ('Vygon') is part of The Vygon Group, a leading global supplier of medical and surgical products (including to the NHS) who have been operating for over 50 years. Vygon's UK base has been located within The Pierre Simonet Building at Gateway North in Swindon since 2011, when they acquired the site and buildings. Vygon is a key local and regional employer and its operations play an important role in supplying the healthcare industry at a national and international scale.
3. The Pierre Simonet Building was constructed to a brief for Motorola, the original occupier, and opened in 1998. When Motorola decided to vacate the site and sell their interest, Vygon chose to relocate to Swindon from their former premises in Cirencester. The business operated across three sites in Cirencester, and the Swindon site provided the opportunity to consolidate their footprint into a single site that allowed for a more efficient operation. Vygon took on occupation of the buildings nearly 15 years ago and has developed and invested in a strong local workforce, mostly based in the Swindon area. While Vygon remains a successful business and has achieved growth in their markets, changing working practices means that the buildings are no longer fit for purpose to meet Vygon's operational and commercial requirements. The existing premises are significantly too large for Vygon's needs, and the site is underutilised. Marketing of the premises has been largely unsuccessful, with only one small part of an upper floor of office space sublet, and part of the site being used for storage by a third party. Over half of the on-site car parking is not used and is surplus to requirements. Owing to these challenges and to ensure that it can remain and continue to viably operate on site, Vygon is proposing to develop a new replacement facility at Gateway North.
4. Vygon's vision is to develop a new Headquarters ('HQ') facility on-site. This will co-locate a number of assembly lines and allow Vygon to develop a functional and flexible warehouse space, alongside office, training and research space in a single building footprint. This will enable a more efficient, functional and sustainable facility tailored to Vygon's operations.
5. Owing to the proposed consolidation of operational space, a significant proportion of the site will be surplus to Vygon's requirements and, as detailed within these representations, it is submitted that the surplus land is suitable for residential development given the surrounding context. This would be classified as Previously Developed Land (PDL, or 'brownfield land'), located in a highly sustainable location, and capable of making a significant contribution towards Swindon Borough Council's housing land supply within the Local Plan period.
6. The proposed development opportunity will:
 - Enable Vygon, a key local employer, to remain on-site. This will retain existing jobs in Swindon and enable the development of a more modern and sustainable

HQ facility tailored to meet the needs of the business and secure their long-term future in Swindon.

- Secure a substantial investment in Vygon's new HQ facility (currently projected to be in the region of up to £14m), with benefits flowing to the local construction economy. Securing their long term presence in Swindon will deliver very significant economic benefits over the course of many years, supporting the local and regional economy.
 - Meet local housing needs within a highly sustainable location within Swindon's defined Urban Area and adjacent to existing residential areas (including a development site subject to a pending planning application being progressed by Homes England immediately to the north). The opportunity to provide in the region of 300 new homes on-site presents significant merits in light of a housing shortfall and support the delivery of the Council's emerging Local Plan.
 - Enable Vygon to invest in their continuing presence in Swindon. The strategy is dependent on the proceeds from the disposal of the surplus land funding the construction of Vygon's new HQ facility to support its long-term aspiration to stay within Swindon. A comprehensive approach to the redevelopment of the site is required to realise this aspiration.
7. We consider that the emerging Local Plan should recognise the opportunity, and potential for significant social, economic and environmental benefits, as result of the proposed redevelopment of the site.
8. We enclose detailed representations to Swindon's emerging Local Plan on behalf of Vygon. This includes comments and suggested amendments to the emerging policy which proposes to designate land at Gateway North (including Vygon's site) as an Industrial Location (Policy FE2). On behalf of Vygon, our submission is that the Plan should include a bespoke allocation policy for Vygon's land for mixed-use employment and residential development. Such an allocation would ensure the Plan is positively prepared and recognises the opportunity to retain existing jobs alongside meeting housing needs, which national planning policy affords significant weight to.
9. In addition, the enclosed response sets our representations to other emerging policies including amendments which we consider to be required in order to ensure the soundness of the Plan.

1. Introduction

- 1.1 These representations have been prepared by **Turley** on behalf of **Vygon (UK) Ltd ('Vygon')** in response to the Swindon Draft Local Plan 2043 (Regulation 18) consultation. They relate to Vygon's land interests and existing premises at Gateway North, Swindon, SN25 4DL.
- 1.2 This response relates specifically to Vygon's current premises and land at **The Pierre Simonet Building, Gateway North, Swindon** as shown on the plan extract included at **Figure 1** below.
- 1.3 Vygon (UK) Ltd ('Vygon') is part of The Vygon Group, who supply medical and surgical products including to the NHS and have been operating for over 50 years. Vygon's UK base has been located at Gateway North in Swindon since 2011. Vygon is a key local and regional employer and its operations play an important role supplying regional and national healthcare infrastructure.
- 1.4 A pre-application submission to is being made in parallel with these representations that provides more information and detail on the proposed development of the site. This approach seeks to concurrently make the case for a change to the planning policy for the site. Specifically to seek an allocation for the mix of employment and residential land uses, and to progress more detailed discussions through the formal pre-application process ahead of planning application submissions in due course.
- 1.5 Comments on the current Local Plan consultation are provided in respect of the individual parts and policies of the Plan, set out under relevant headings in the subsequent sections of this document. In accordance with the Council's Representations Form (which has been completed and enclosed separately), the response is formatted to include comments and suggested clarifications or additions (changes) to policies.

Figure 1 – Site Location Plan



2. Policy SS1 – Swindon’s Spatial Approach to Growth

Comments

- 2.1 Emerging Policy SS1 sets out the proposed overarching spatial approach to housing, commercial and industrial growth and supporting infrastructure for Swindon. The policy identifies the specific locations proposed to be the main focus for this growth including within Swindon Urban Area Sustainable Development Locations (including the town centre, Strategic Growth Location, Urban District Centres, Urban Regeneration Areas and along key public transport corridors), for employment uses within Industrial Locations and at Strategic Growth Locations.
- 2.2 Vygon fully supports the identification of locations within Swindon’s Urban Area located along key public transport corridors as being appropriate to accommodate new development and growth. Vygon’s land is located just off the A4198 (Thamesdown Drive) and is served by existing bus stops along Salzgitter Drive, which provide direct connection into the town centre and to the nearby Orbital Shopping Park. Furthermore, the site is within a 5 minute walk from existing services along Latham Road including the Aldi supermarket, David Lloyd gym and restaurants. It is clear that the site is within a highly sustainable location as defined at emerging Policy SS1 and where development (of both housing and employment uses) are wholly appropriate.
- 2.3 The emerging policy supports the principle of employment uses being within the proposed designated Industrial Locations. We consider that the Local Plan should accord with the principles at Paragraph 86 of the NPPF which require planning policies to be *“flexible enough to accommodate needs not anticipated in the plan, and allow for new and flexible working practices and spaces to enable a rapid response to changes in economic circumstances.”* Opportunities for sustainable mixed-use development in all appropriate locations, such as on Vygon’s land, should be acknowledged in accordance with the provisions of national planning policy.
- 2.4 The new Local Plan should positively plan for new residential development alongside economic development in sustainable locations, to ensure that local needs can be met and that existing businesses are supported and able to remain. We set out further comments in relation to the dedicated Industrial Locations policy and why we consider Vygon’s land is wholly appropriate for a mix of uses other than ‘industrial’ uses (including residential development alongside its proposed replacement HQ facility).

Changes

- 2.5 We consider that the policy should be amended to recognise and plan for sustainable growth and mixed-used development opportunities (including for residential) within designated Industrial Locations, where appropriate and evidenced. This would align with the principles of National Planning Policy which seek to ensure that planning policies are flexible to accommodate new and flexible working practices and to respond to changes in economic circumstances.
- 2.6 Accordingly, we consider the following amendments to the policy wording should be made:

“The main focus for housing, commercial and industrial growth for Swindon, including most of its supporting infrastructure, services and facilities, is illustrated on Figure 2 and will be:

a) within Swindon Urban Area Sustainable Development Locations, (as designated on the Policies Map), which are:

- 1. Swindon Town Centre and the wider 'Central Area' Strategic Growth Location;*
- 2. Urban District Centres;*
- 3. Urban Regeneration Areas (including Pipers Way and Marlowe Avenue);*
- 4. and along key public transport corridors;*

b) for employment uses only, to designated Industrial Locations (particularly for light industrial, industrial, warehousing and distribution) unless there is clear evidence to justify alternative non-employment uses;

c) the Strategic Growth Locations of New Eastern Villages, Wichelstowe, Kingsdown, East Wroughton and North Tadpole.”

3. Policy SP1: Sustainable Development

Comments

- 3.1 Policy SP1 sets out the Council's overarching strategy for delivering high quality, sustainably designed development. The overarching objectives and principles set out are supported. The need and benefits of providing a sustainable development which incorporates high quality design, respects the local heritage, and improves active lifestyle is well understood.
- 3.2 It is also understood that Swindon sits in an area of severe water stress, and the need for liaison with Thames Water is understood, as is the need to secure energy capacity. We would note that connection capacity may be conditional on timescales set out by Thames Water and 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, consideration should be given to connection agreements and timescales provided by Thames Water and SSEN.

Changes

- 3.3 In this context a small amendment to section 4 is proposed:

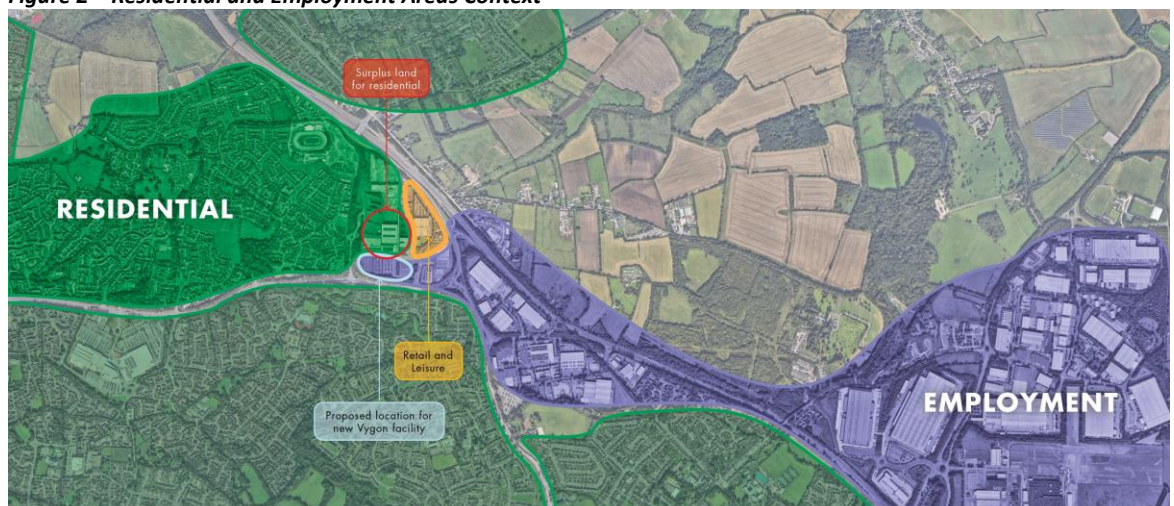
4. The approval of new development will be conditional on the appropriate water infrastructure and energy capacity being ~~in place~~ secured. Developers should engage with Thames Water and SSEN (Scottish and Southern Electricity Networks) early in the planning process in line with Policies U1 and U2.

4. Policy SD1 – Effective Use of Land

Comments

- 4.1 Vygon supports the principle of emerging Policy SD1, which encourages development proposals to make effective use of land through optimising density whilst being sympathetic to the surrounding environment.
- 4.2 The emerging Policy sets out that proposals for employment uses should demonstrate how they have sought to intensify floorspace capacity. Vygon's proposal to develop a new bespoke HQ facility is wholly consistent with this emerging policy. The intention is for their business space to be modernised and adapted through the optimisation of its facilities and the provision of more efficient space. This will in turn intensify the floorspace capacity within the new building, compared to the existing premises which comprises large areas of redundant space.
- 4.3 Vygon's development proposals seek to make the most effective use of the site through the intensification of employment uses within its new facility. Vygon is anticipating investing over £10 million in the new HQ facility to ensure it can remain within Swindon. The delivery of new homes on the remaining surplus land will not only ensure the most efficient use of land in accordance with the emerging Local Plan and national planning policy; it will also generate a land receipt and in turn enable Vygon to make such a significant investment.
- 4.4 Vygon intends to deliver its new facility within the southern part of the site, close to existing commercial uses in the vicinity within Gateway North, and suitably located between the A4198 Thamesdown Drive to the south and the proposed residential land to the north. The proposed residential development is intended to come forward on the remaining northern part of the site. This aligns with the residential proposals immediately to the north (the Homes England site) and the wider existing, residential areas to the west. See **Figure 2** for further details. This would demonstrate a wholly optimised and efficient use of the site, whilst ensuring it is sympathetic to the surrounding environment in accordance with emerging Policy SD1.

Figure 2 – Residential and Employment Areas Context



Changes

- 4.5 In order to ensure that the Plan is positively prepared, in a way that is aspirational but deliverable, we consider that the policy wording should be amended to acknowledge that when assessing whether employment uses make an effective use of land that this should take account of local business needs and wider opportunities for development in accordance with the Framework. Accordingly, the policy should be amended to state *“proposals for employment uses should demonstrate how they have sought to intensify floorspace capacity where possible, as well as taking into account local business needs and wider opportunities for efficient and effective use of land, including development.”*

5. Policy SP2 – Homes for the Community

Comments

- 5.1 The emerging Local Plan sets out that the housing requirement calculated against the most up to date standard method is 1,205 homes per annum, a total of 24,100 homes over the 20-year plan period.
- 5.2 Turley has conducted a technical review of the emerging approach towards housing provision in Swindon, as set out in the draft Plan, to ascertain whether this is likely to meet both the overall need for housing and the specific need for affordable housing. The full report is enclosed at **Appendix 1**.
- 5.3 This review 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.
- 5.4 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).
- 5.5 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.

- 5.6 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.
- 5.7 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
- 5.8 To ensure the emerging Local Plan is positively prepared and to help contribute to housing supply, the Council should maximise opportunities to allocate sites for development in sustainable locations. The development opportunity on Vygon’s land would deliver in the region of 300 new homes and make a meaningful contribution to meeting housing needs within Swindon. The site is available for development and deliverable within the first half of the plan period.

Changes

- 5.9 We consider that the emerging Local Plan and Policy SS2 should be updated to reflect a higher benchmark for housing growth, more reflective of the future need in Swindon. In order to boost the delivery of new homes and the standard method figure should be considered the minimum.
- 5.10 Additional sites should be allocated for housing development. As set out within our detailed comments to emerging Policy FE2, Vygon’s land represents a highly sustainable and deliverable residential development opportunity and should therefore be allocated in order to help meet Swindon’s housing needs within the first half of the plan period.

6. Policy FE2 – Industrial Land (Scale and Location)

Comments

Introduction

- 6.1 Emerging Policy FE2 relates to the industrial and warehousing uses, including the provision of new space and existing industrial land. It proposes that within designated Industrial Locations, industrial activities (including light industrial, heavy industrial and warehousing and distribution uses) will be permitted and safeguarded.
- 6.2 The emerging policy includes limited flexibility for other (non-industrial) activities in certain specific circumstances. It states that Sui Generis development that aligns with the industrial purpose of the area would normally be supported, as well as the temporary use of empty buildings and vacant sites for a period of no more than three years and where this would help rejuvenate the industrial area. As drafted, the policy is highly restrictive of land uses outside of these circumstances and would not allow residential development to come forwards as proposed in these representations.
- 6.3 A wider parcel of land at Gateway North, including Vygon's land interests, is proposed to be designated as an Industrial Location (see **Figure 3**, land highlighted purple). This is understood to broadly reflect the role of the existing policy designation for Key Employment Areas via Policy EC2 of the adopted Local Plan (2015). The land outlined in black to the east is additional land, not previously designated, now proposed to be designated as an Industrial Location. The emerging Local Plan identifies other locations in the Borough as 'Mixed-Use Transitional Industrial Location' sites, however Vygon's site is not included within this designation.

Figure 3 – Snippet of Local Plan (Regulation 18) Policies Map



- 6.4 Vygon disagrees with the proposed allocation of the site for purely industrial purposes. The current planning permission for the site (ref. S/09/1817) is for Use Classes B1a

(offices – now Use Class E), B1b (research and development now Use Class E) and B8 (warehousing). Therefore Vygon’s existing operational use does not wholly reflect an ‘industrial use’ as defined by the emerging designation.

- 6.5 National planning policy is clear that the planning system should create conditions within which businesses can invest and adapt, as well as promoting the effective use of land to meet housing and other needs. The proposed redevelopment of Vygon’s land will enable it to adapt to its business needs, providing a new tailored facility and retaining existing jobs on-site, alongside providing new homes on brownfield land. This should be afforded significant weight. The new Local Plan should be positively prepared to support this suitable, available and deliverable sustainable development opportunity.

Vygon’s Proposals & Suitability for Employment and Residential Development

- 6.6 Vygon is committed to retaining its existing operations on-site and within Swindon. The decision to redevelop a new facility in this location has been informed by a comprehensive business case (informed by much of Vygon’s existing workforce being based locally) and a robust site-search and assessment of alternative sites in Swindon. The conclusion of this exercise was that there are few deliverable land or property opportunities available in the current market which would provide a material improvement to what can be achieved on Vygon’s existing site at Gateway North. Therefore, the decision for Vygon to invest in its existing site is most optimal for Vygon’s operations.
- 6.7 Vygon’s vision for the new purpose-built facility is to co-locate a number of assembly lines and to develop a functional and flexible warehouse space. Office, training and research space will be provided alongside that, with appropriate staff welfare facilities. This mirrors the existing types of uses on site. The new purpose-built facility will extend to approximately 5,500 sqm, reduced from the current building’s 13,525 sqm footprint. This is due to the proposed consolidation of Vygon’s assembly line and overall improved operational efficiencies. In particular, the existing building provides far too much office space for Vygon’s needs and the lack of interest following marketing of the space has demonstrated there is no evidence of market demand for the office space. The existing building was originally developed for Motorola and the premises have been surplus to Vygon’s requirements since they occupied the building in 2011, with that becoming more apparent with changing working practices. Owing to various factors including more flexible working arrangements, a significant proportion of the office space within the existing building is now vacant. Marketing of the premises has largely been unsuccessful. Accordingly, the proposed demolition of the existing building and provision of a new replacement facility is considered to be essential for commercial reasons.
- 6.8 The proposed development will not result in any reduced level of operations or overall employment (with the current facility supporting approximately 75 jobs). Vygon anticipates there may be a very slight reduction to supporting cleaning and servicing staff numbers as a result of the reduced premises, however this will be balanced with additional jobs created through the construction period. There is no planned reduction in more highly skilled workers based at the site.

6.9 Owing to the proposed consolidation of operational spaces within Vygon's new facility, this will result in surplus land being made available on-site. The disposal of this land is fundamental to enable Vygon to remain on-site and to fund the c. £10-£14 million upfront investment development in its new premises. For the reasons set out below, the surplus land is wholly suitable for residential development with a capacity for approximately 300 homes:

- The site is within a highly sustainable location within the defined Urban Area of Swindon and where sustainable travel opportunities can be maximised in accordance with the provisions of emerging Policy SS1.
- The surrounding area is defined by a mix of residential, commercial, leisure, and retail uses. The site is served by existing pedestrian connections to Latham Road to the east, which provides direct and safe access to the local services and amenities including the David Lloyd Leisure Centre, ALDI supermarket and restaurants. These existing amenities are all located within a 5-minute walk from the site and are wholly complimentary to the proposed residential development of the site.
- There are wider connections to existing Public Rights of Way and cycle and pedestrian infrastructure within immediate proximity. These provide access to onward routes into the surrounding areas via existing pedestrian and cycle infrastructure including to the Abbey Stadium, other residential areas, and key local facilities including the Orbital Shopping Park and community routes to Swindon town centre. There are existing bus stops located along Salzgitter Drive which serve the Vygon site.
- The proposed residential development is intended to come forward on the northern part of the site. This aligns with the emerging residential proposals immediately to the north and would align with the wider existing, residential areas to the west.

6.10 Vygon has appointed a technical consultant team who are progressing detailed assessment of the site to inform the emerging development proposals. Initial technical work has concluded that there are no fundamental environmental or technical constraints which would preclude the proposed development. This analysis has included assessment of the following considerations:

- The proposed mixed-use employment and residential development is wholly compatible with surrounding uses (as set out above).
- The site is located entirely within Flood Zone 1. There is sufficient space within the site to deliver new Sustainable Drainage solutions and to mitigate any small pockets at risk of surface water flooding.
- Preliminary ecological assessment work has concluded that the areas of highest ecological value are the dense trees belts along the site boundaries. These are being retained by the development proposals wherever possible. Protected species surveys have been completed or are underway.

- There is sufficient space on-site to provide high quality open and amenity space to serve both the new employment (Vygon) facility and new residential development. Opportunities to achieve 10% statutory Biodiversity Net Gain on-site are being explored as part of the detailed design work.
- The site benefits from two existing vehicle access points to the west via Saltzitter Drive and to the east via Latham Road respectively. Both options are available as part of any redevelopment proposals, which creates flexibility as the proposals progress and more detailed consideration is given to how best to achieve the optimal accessibility and highways outcomes.

6.11 Fundamentally, there are no technical issues or constraints which would restrict high-quality, sustainable development proposals from coming forward. Vygon is undertaking a separate pre-application enquiry with the Council which demonstrates further details of the technical work that is being conducted and that the site is suitable for development.

Policy Considerations & Evidence Base Review

- 6.12 Vygon raises concern with the wording of Policy FE2 as currently drafted. Particularly noting the omission of any opportunity for alternative development uses to be considered, even where there is evidence to justify this and existing employment would be retained. This is in conflict with paragraph 85 of the Framework and the Planning Practice Guidance¹.
- 6.13 The relevant policy within the adopted Swindon Local Plan (Policy EC2) relates to Key Employment Areas (which Vygon's land is currently designated as) and includes provision for alternative, non-employment uses to be accepted subject to clear evidence and justification. Vygon's new operational facility would be supported by adopted employment land policy, and evidence is being prepared to demonstrate that the proposed residential development would meet the criteria required to justify alternative uses. This includes that marketing has demonstrated a lack of interest in the existing buildings, and that there will be no overall reduction to employment opportunities.
- 6.14 Vygon disagrees with the policy wording in emerging Policy FE2, which does not include the same provision for alternative non-employment uses to be accepted where justified by clear evidence. The approach is inconsistent with national planning policy², which encourages *multiple benefits* from urban and rural land including mixed use schemes and promotes the development of under-utilised land and buildings, *especially* if this would help to meet identified needs for housing where land supply is constrained and land could be used more effectively. The opportunity for redevelopment at Vygon's site is wholly consistent with the principles of sustainable development set out in national planning policy. These principles should be reflected within the emerging Policy wording.
- 6.15 The Council's evidence base includes an Employment Needs and Land Supply Study (March 2025). Paragraph 1.61 of the Study states that "*certain identified areas of*

¹ Planning Practice Guidance Paragraph: 001 Reference ID: 66-001-20190722

² Paragraph 125 of the National Planning Policy Framework.

employment land could be released for other uses in times, although support should be given to existing occupiers on these sites.” At paragraph 1.64 the Study emphasises the importance of collaboration between Swindon Council, businesses and other stakeholders as key to economic success. Vygon supports the recommendations within this Study, acknowledging that there are areas of employment that will need to be released for other uses particularly where existing occupiers are supported on site. The proposed development on Vygon’s land would enable the retention of this key local employer on-site. Vygon is keen to collaborate with the Council to ensure that economic successes can be achieved by enabling development which supports it to stay on-site and to retain jobs, alongside provision of new homes.

- 6.16 Vygon’s land interests are not assessed within the Strategic Housing Land Availability Assessment (2025) published as part of the evidence base. However the land immediately to the north (ref. S0401 Land North of Latham Road) is assessed as being suitable for development, with positive assessment made in particular with regard to heritage, landscape, archaeology and ecological considerations. The findings indicate the site is *‘particularly’ suitable for employment uses*, however Vygon considers that this site to the north and it's land interests immediately south of this are wholly suitable for mixed-use or residential development.

Summary

- 6.17 Vygon’s land at Gateway North represents an optimal location for a new, consolidated replacement facility for its employment uses alongside residential development. The proposals will:
- Enable Vygon, a key local employer, to remain on-site. This will retain existing jobs in Swindon and enable the development of a more modern and sustainable HQ facility tailored to meet the needs of the business and secure their long-term future in Swindon.
 - Secure a substantial investment in Vygon’s new HQ facility (currently projected to be in the region of up to £14m), with benefits flowing to the local construction economy. Securing their long term presence in Swindon will deliver very significant economic benefits over the course of many years, supporting the local and regional economy.
 - Meet local housing needs within a highly sustainable location within Swindon’s defined Urban Area and adjacent to existing residential areas (including a development site subject to a pending planning application being progressed by Homes England immediately to the north). The opportunity to provide up to 300 new homes on-site presents significant merits in light of a housing shortfall and support the delivery of the Council’s emerging Local Plan.
 - Enable Vygon to invest in their continuing presence in Swindon. The strategy is dependent on the proceeds from the disposal of the surplus land funding the construction of Vygon’s new HQ facility to support its long-term aspiration to stay within Swindon. A comprehensive approach to the redevelopment of the site is required to realise this aspiration.

- 6.18 The site is suitable for the proposed mixed-use development owing to its highly sustainable location and lack of any site-specific constraints that cannot be appropriately mitigated. Vygon is the freehold landowner, and it intends to retain ownership of its new facility in perpetuity. The proposed residential land is available for development and is deliverable within the short-medium term and can therefore be included in the Local Plan period housing trajectory. Vygon is committed to investing in the delivery of a new facility as quickly as possible and promoting the opportunity for residential development on the surplus land available.

Changes

- 6.19 In order to progress a Sound Local Plan, our recommendations are as follows:
- Ultimately, Vygon considers that a bespoke allocation policy should be included within the Local Plan to enable the proposed mixed-use residential and employment development on its land at Gateway North. Such an allocation would be entirely justified, supported by a considerable weight of evidence on need, and would deliver significant economic and social benefits for the Borough. This would ensure that the Plan is positively prepared in a way that is deliverable.
 - Secondly, we would request that text be inserted to Policy FE2 to enable the change of use or alternative (non-industrial) uses to be supported where there is clear and robust evidence which supports this. In particular where there will be no direct reduction to the existing number of jobs provided on-site and where other needs (in particular housing) can be met alongside employment. New job opportunities would also be created in the construction period for both the residential and employment elements. This would support the provisions of sustainable development and effective use of land, in accordance with national planning policy.

7. Policy SP6 – Climate Stability and the Environment

- 7.1 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.
- 7.2 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.
- 7.3 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.
- 7.4 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.
- 7.5 In this context it is considered that Policy SP6 aligns with national guidance and policy and is supported.

8. Policy CS1 – Carbon Reduction and Sustainable Design in New Development

Comments

- 8.1 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.
- 8.2 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.
- 8.3 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'.
- 8.4 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.'
- 8.5 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.
- 8.6 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.

- 8.7 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.
- 8.8 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.
- 8.9 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.

Changes

- 8.10 The following amendments to the Policy are recommended:

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.

9. Policy CSE2 – Whole Life Carbon Assessments

Comments

- 9.1 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.
- 9.2 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.
- 9.3 However, in relation to residential development, 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 a 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.
- 9.4 The Local Plan should acknowledge that where existing buildings are no longer fit for purpose, there are significant opportunities for improved energy efficiency and overall sustainability performance through new build development. The existing buildings on site, occupied by Vygon, are dated and perform poorly in terms of operational energy efficiency. The buildings were constructed to meet another business's needs to a specific brief, using mechanical and electrical plant of its time. That plant and equipment is now highly inefficient compared to modern standards and requires significant maintenance upkeep. The running costs of the building are very high and the operational carbon emissions are also high. The costs of adapting and retrofitting the buildings present significant challenges and would not be economically feasible. A new HQ building for Vygon would be constructed to high standards of design with the aim of significantly reducing carbon emissions in construction and operation, which could be demonstrated through a WLCA as part of a full planning application submission.
- 9.5 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.
- 9.6 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.

Changes

9.7 As noted above some minor amendments are proposed to this policy:

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

10. Policy U1 – Wastewater, Sewage Infrastructure and Water Supply.

Comments

- 10.1 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.
- 10.2 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.
- 10.3 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.
- 10.4 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.
- 10.5 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.
- 10.6 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.
- 10.7 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.
- 10.8 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.

Changes

10.9 In this context we would recommend the following amendments:

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.~~

11. Policy U3 - Energy Networks

- 11.1 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.
- 11.2 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.
- 11.3 The introduction of the FHS will require development to incorporate low carbon renewable energy and sustainable on-site solutions.
- 11.4 The objectives of this policy are supported.

Appendix 1: Technical Review of Housing Needs in Swindon

Technical Review of Housing Needs in Swindon

October 2025



Turley

Contents

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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

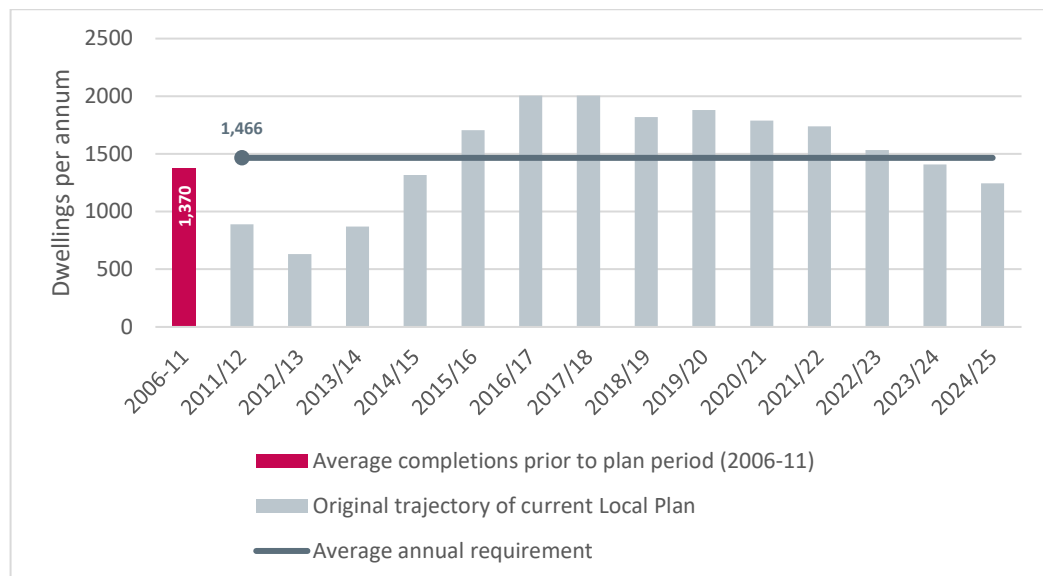
2. Context for the New Local Plan

- 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

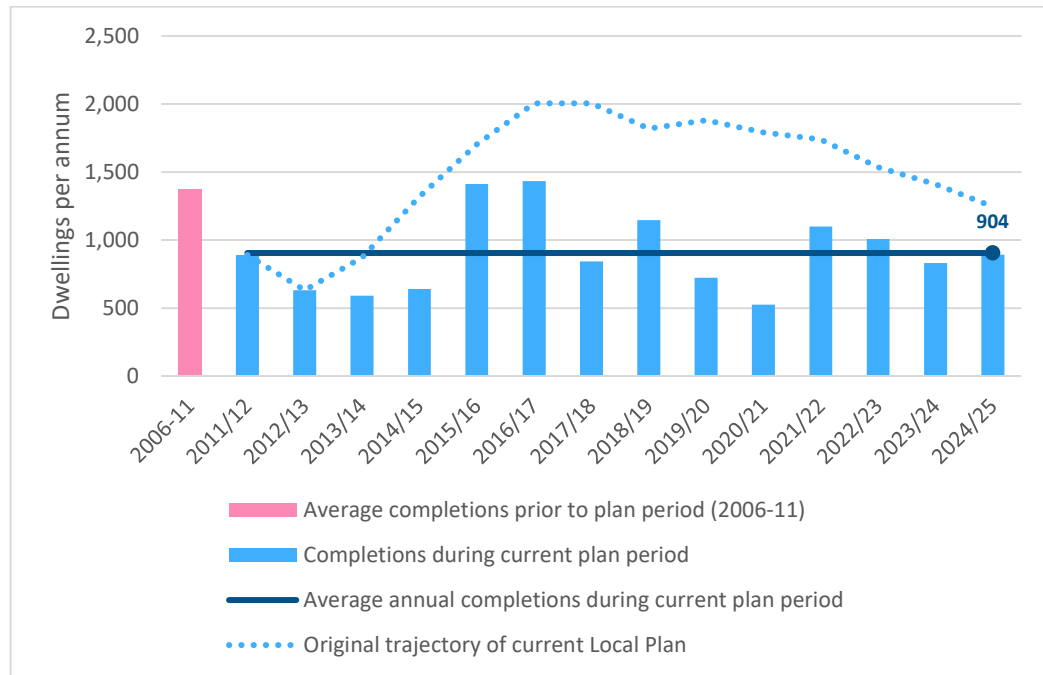
⁵ *Ibid*, Appendix 5

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%.

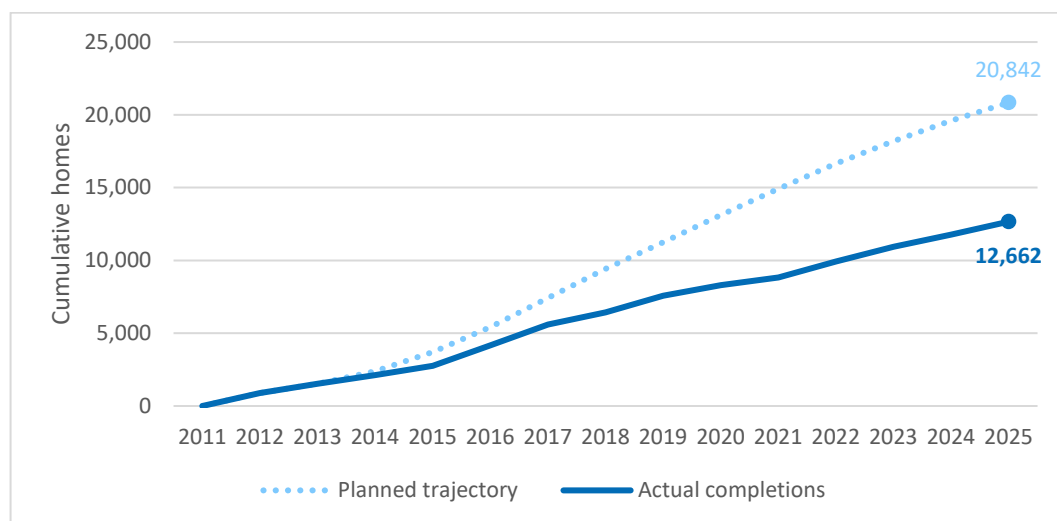
Figure 2.2: Completions vs. Previous Delivery and Planned Trajectory



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)

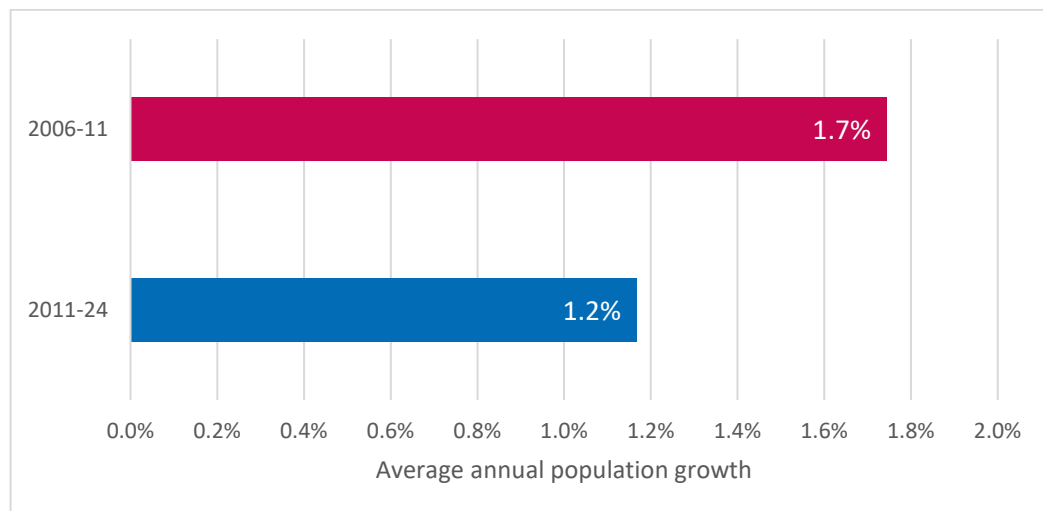


Source: Swindon Borough Council; MHCLG

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

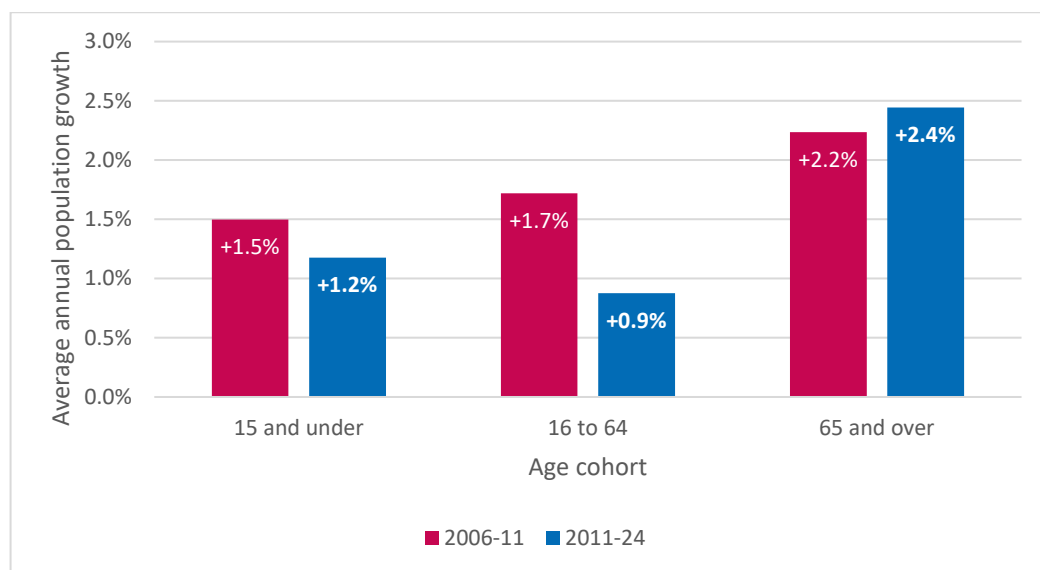
- 2.8 The slowdown has been even more pronounced for the working age population, aged 16 to 64. While this too was previously growing at a rate of 1.7% per annum over the five years to 2011, it has since grown barely half as quickly at an average rate of only 0.9% per annum¹⁰. The ageing of the population 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

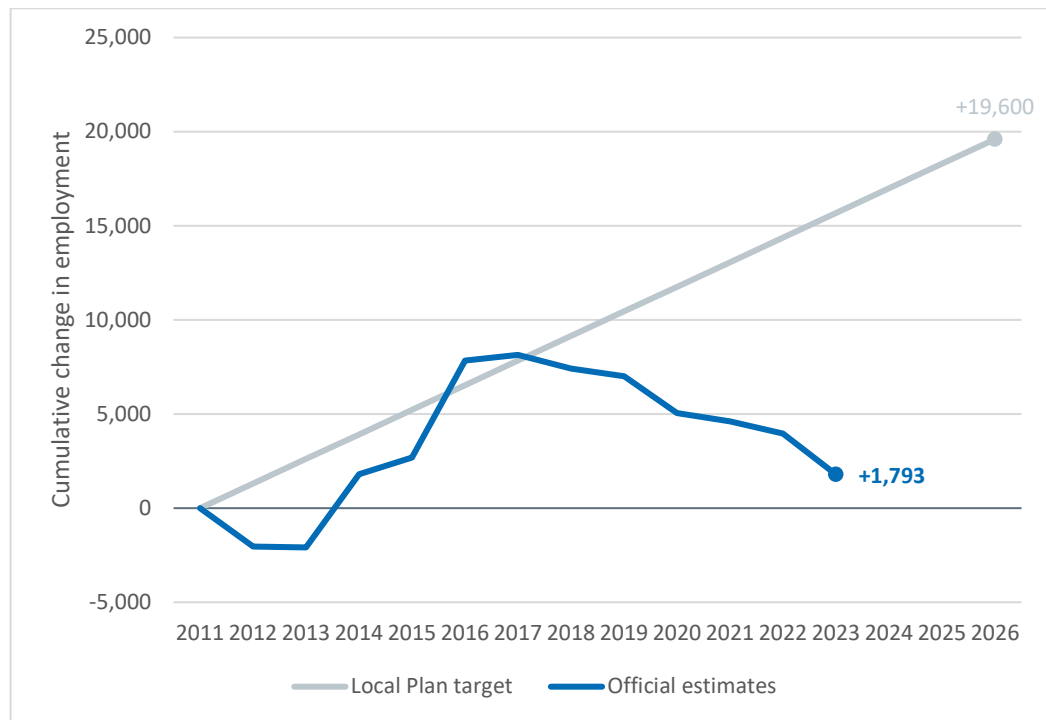
- 2.9 The slowing growth of the working age population will have likely squeezed the local labour market, with the near-halving of the unemployment rate a further sign of the growing lack of latent labour in Swindon¹¹.
- 2.10 This will have almost certainly contributed towards the borough's relatively 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



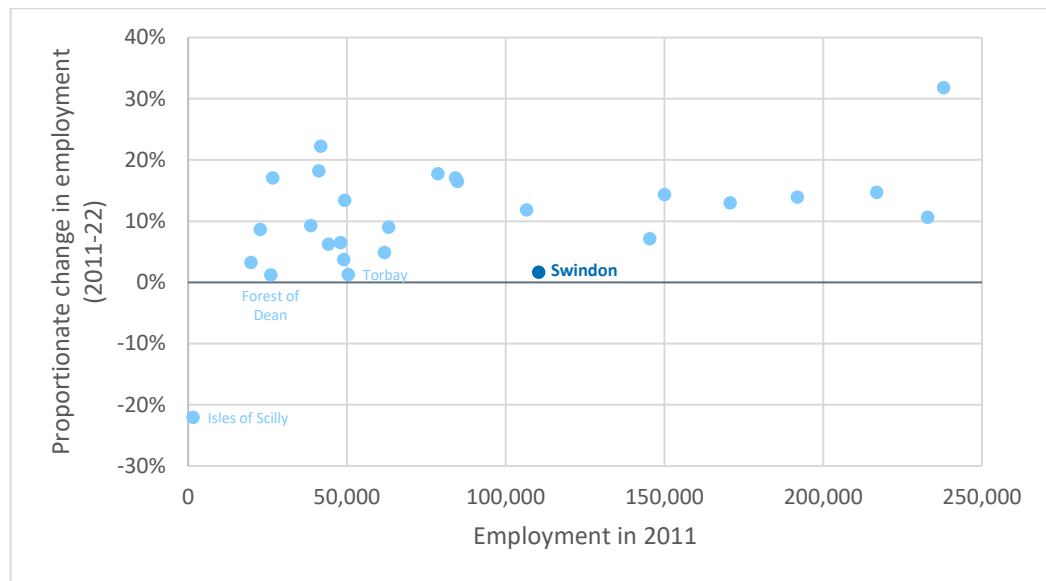
Source: Swindon Borough Council; Business Register and Employment Survey

- 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

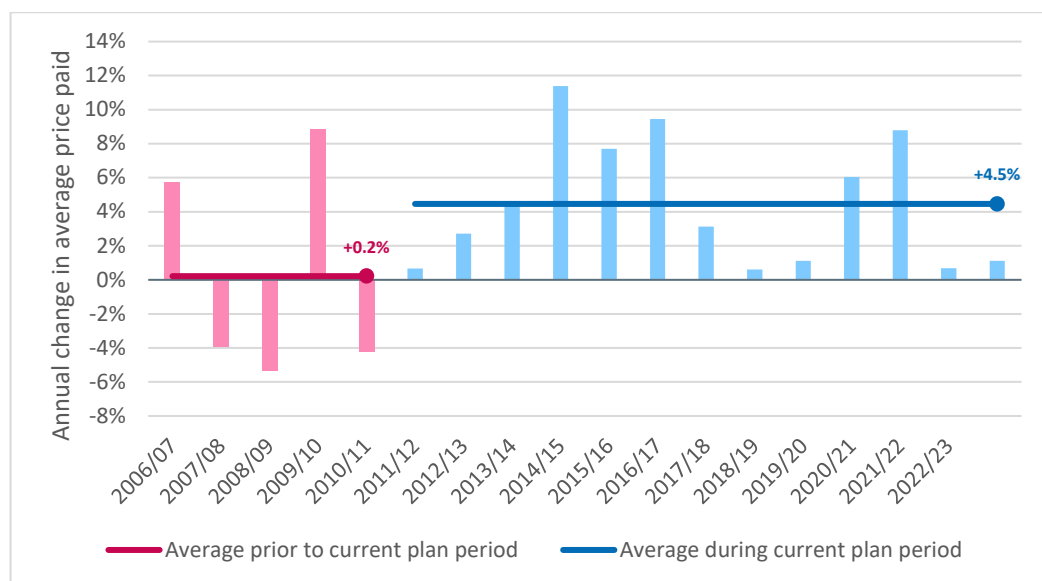
- 2.12 Failure to deliver planned housing growth in Swindon appears to have also put pressure on house prices, which are widely acknowledged to provide an indication of the balance between supply and demand¹⁴.
- 2.13 Data published by the Land Registry indicates that the average price paid for housing 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

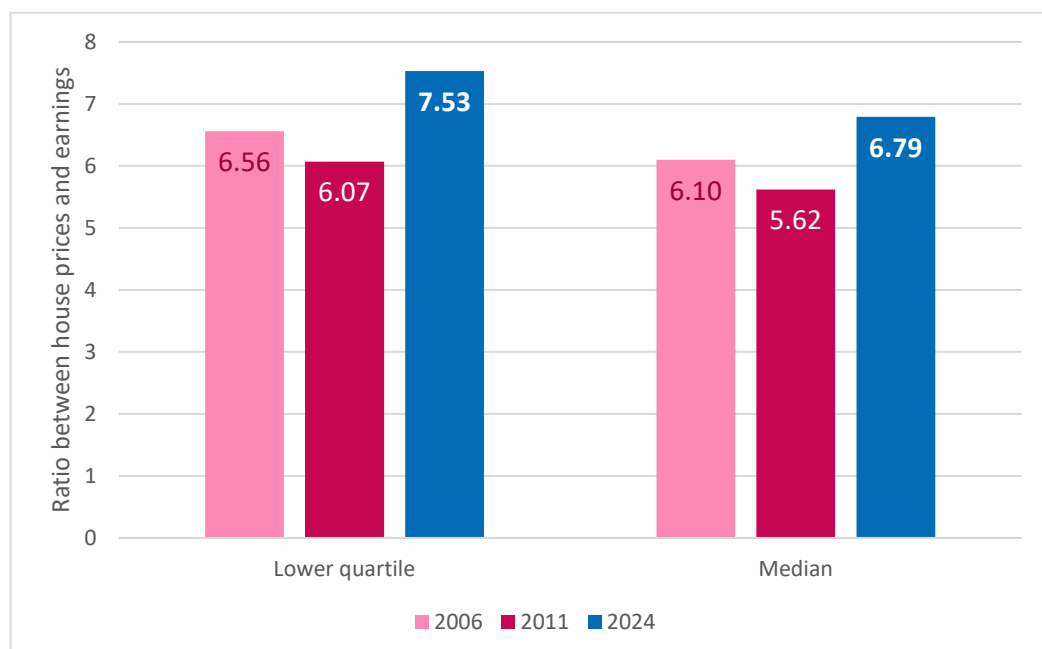
Figure 2.8: Annual Change in the Average Price Paid for Housing in Swindon



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

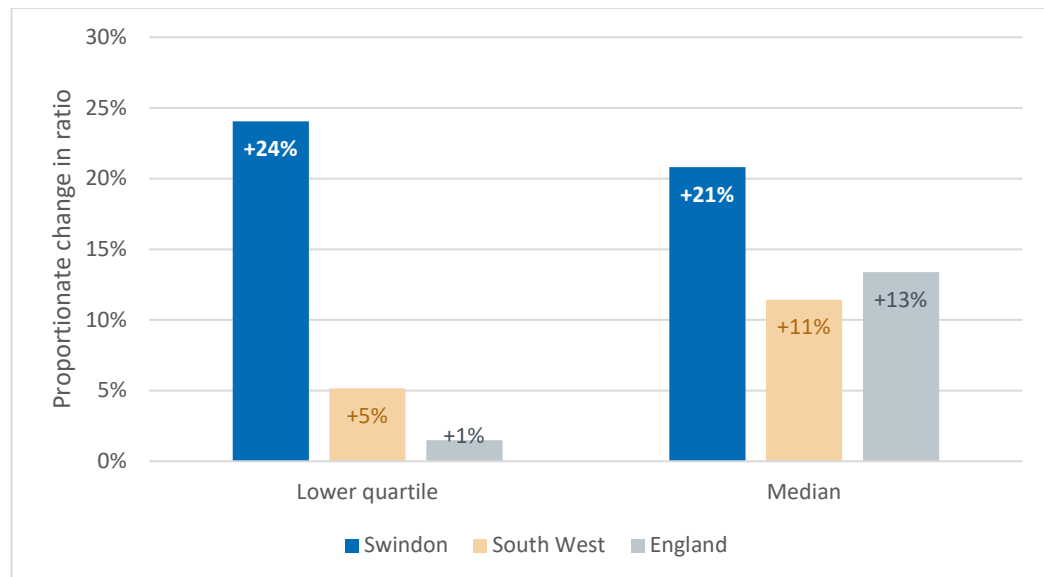


Source: ONS

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.

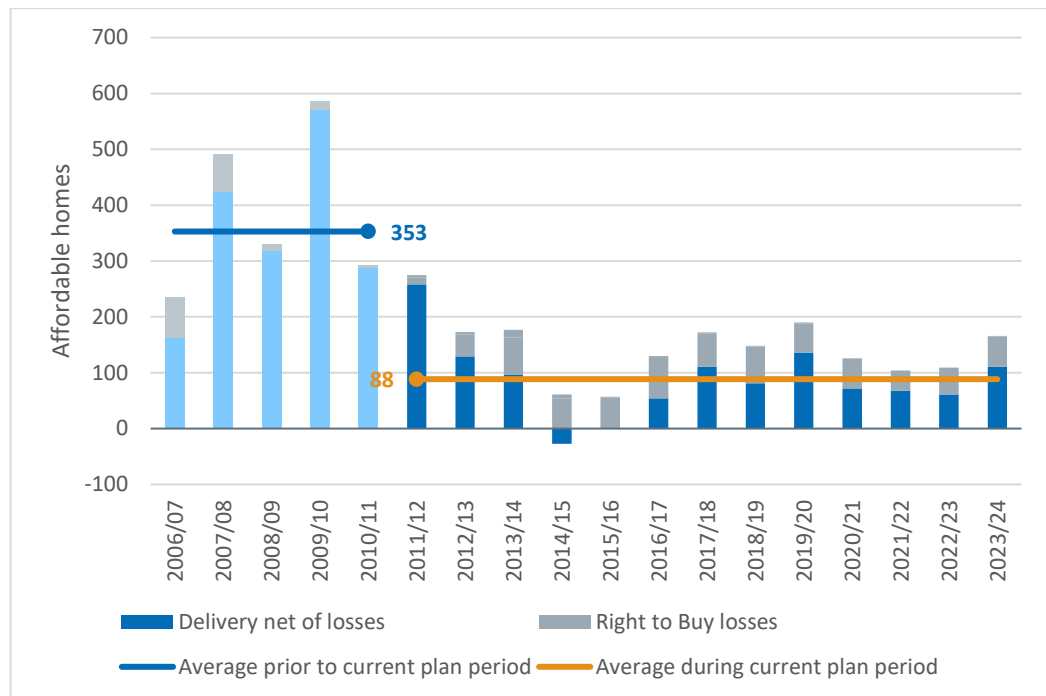
¹⁷ MHCLG (June 2024) Live Table 1008C: Total additional affordable dwellings provided by local authority area – completions

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

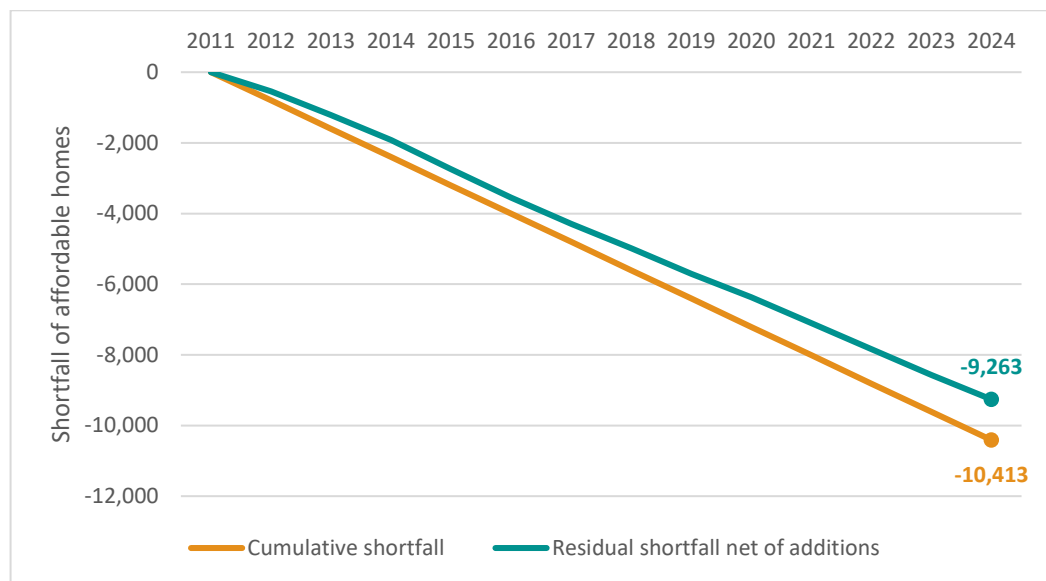
Figure 2.11: Affordable Housing Delivery and Losses through Right to Buy



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

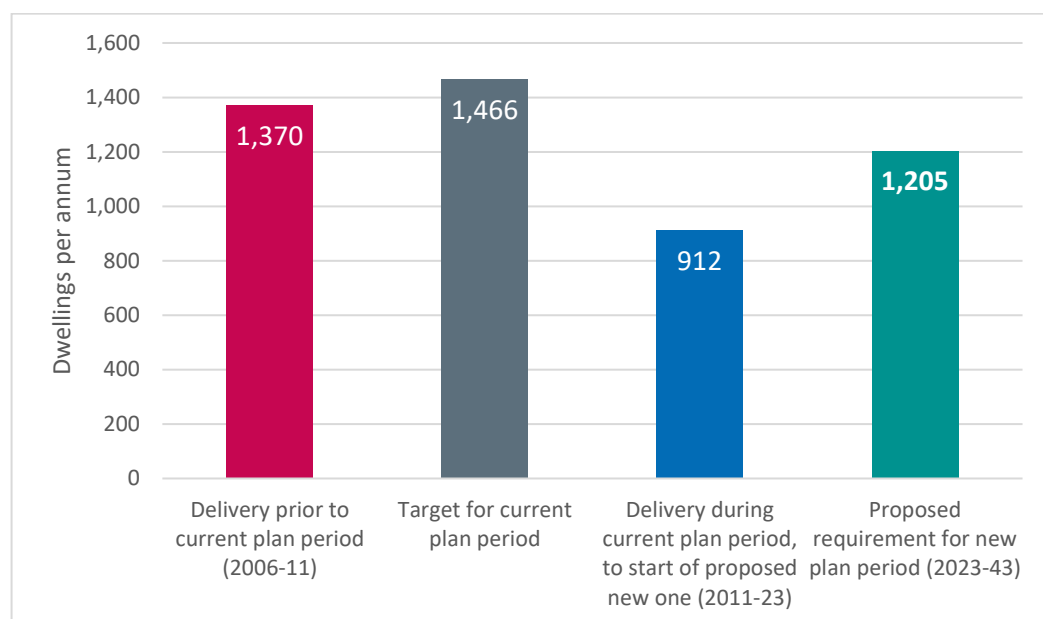
Summary

- 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

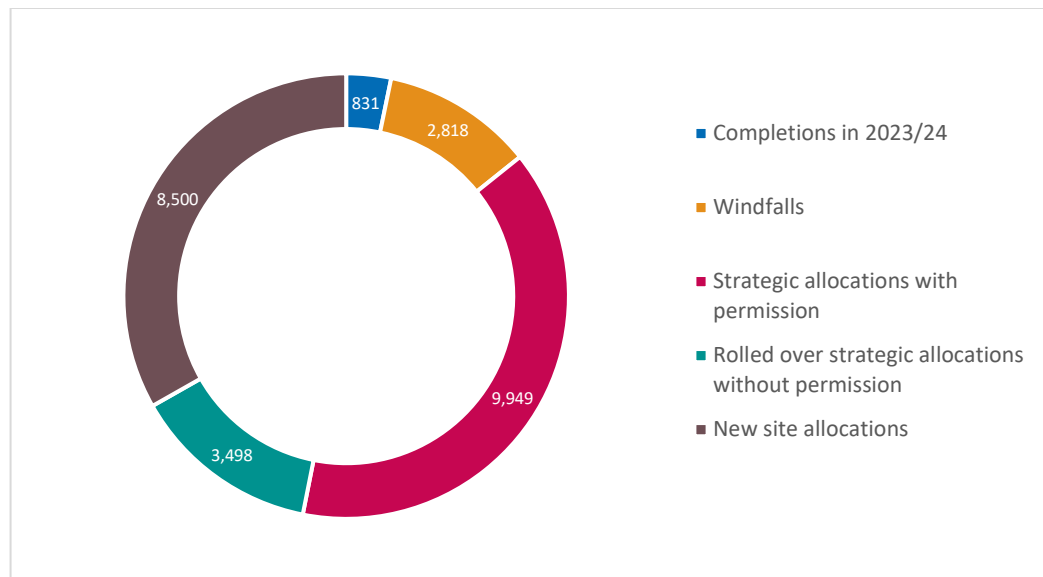
- 3.4 The Council assumes that existing planning permissions will meet more than half of the identified need, adding to homes that are known to have already been completed in the

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

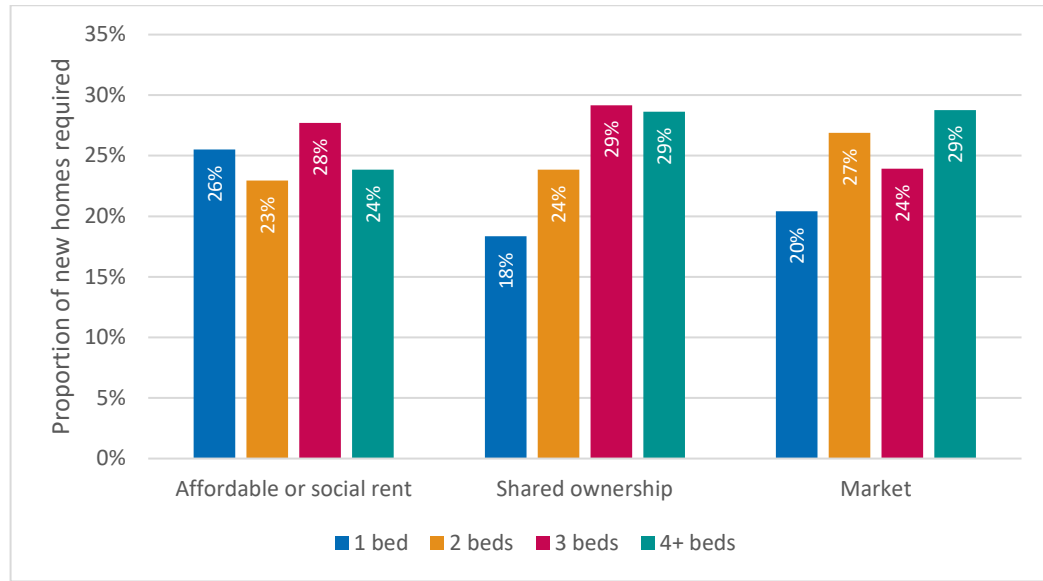
²⁵ *Ibid*, Appendix 3

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

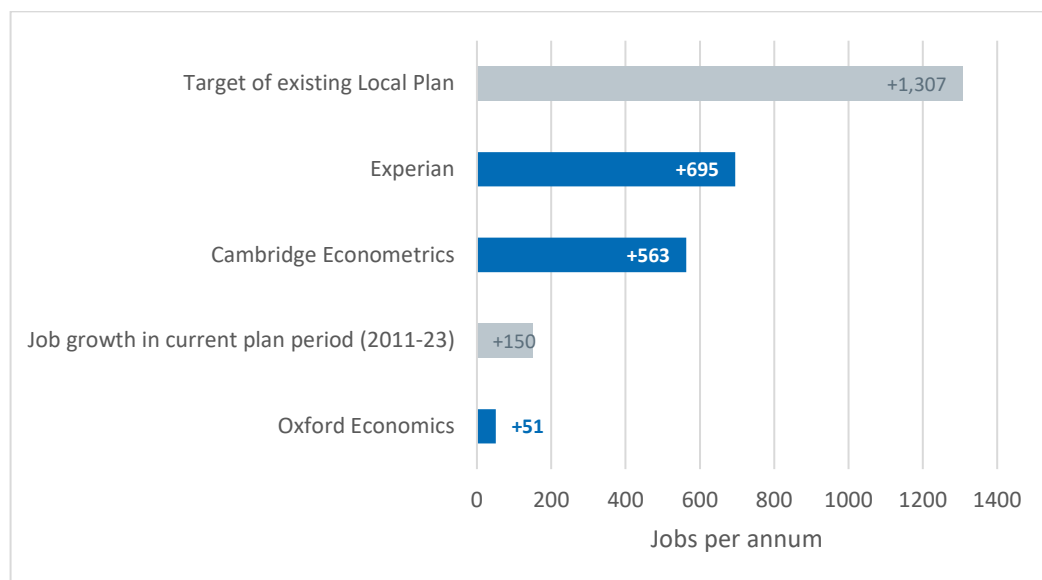
Summary

- 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

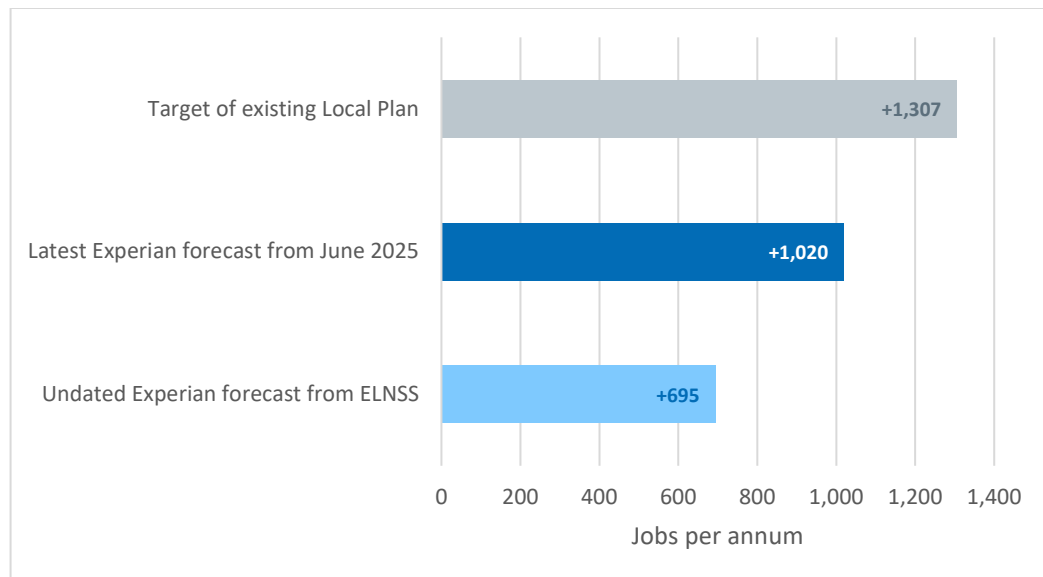
²⁹ Icen Projects (March 2025) Swindon Employment Needs and Land Supply Study, paragraph 1.52

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

³¹ Icen 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 *'rebasin'* 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

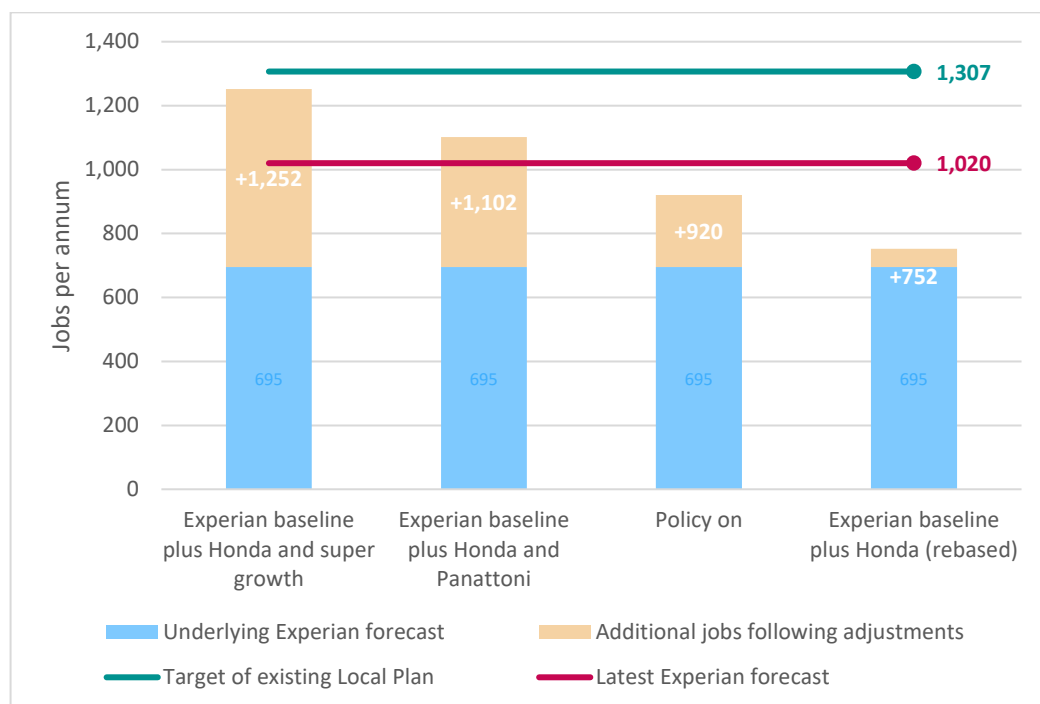
³³ *Ibid*, paragraph 10.21

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

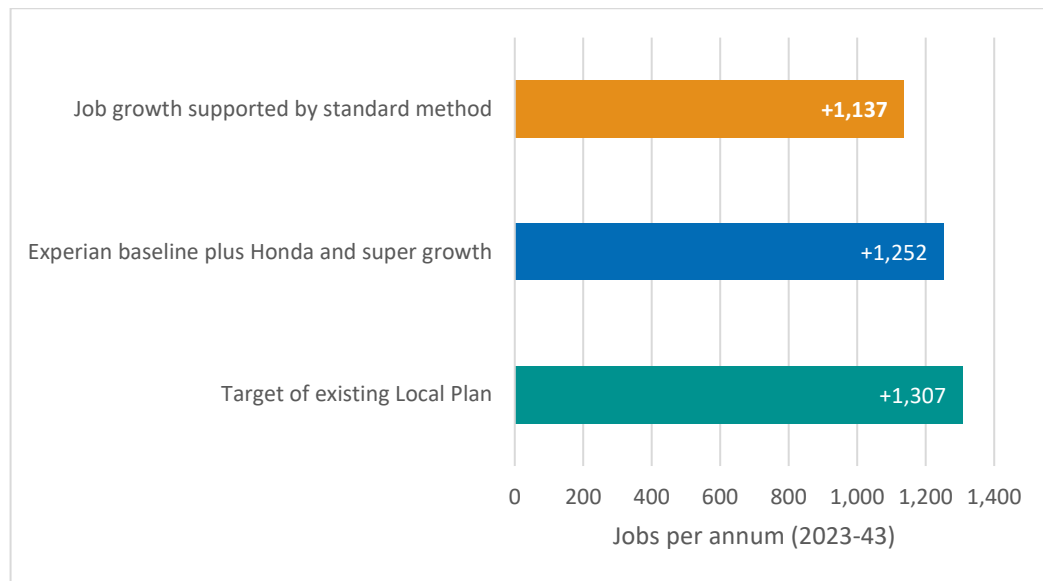
⁴¹ *Ibid*, p8

⁴² *Ibid*, p9

⁴³ Iceni 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 to 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 – referenced in the earlier section 3 – 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.

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 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

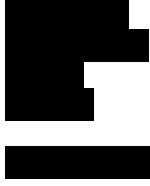
T232	South Marston Phase 9 (Taylor Wimpey) (see footnote 3)	Erection of 134 dwellings and provision of public open space with associated infrastructure and earthworks (layout, scale, appearance and landscaping) - Reserved Matters from previous outline permission S/OUT/13/1555.	SOUTH MARSTON	S/OUT/13/1556	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



Turley Office

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[REDACTED]

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RESPONSIBILITY IS NOT ACCEPTED FOR ERRORS MADE BY OTHERS FROM SCALING FROM THIS DRAWING. ALL CONSTRUCTION INFORMATION SHOULD BE TAKEN FROM FIGURED DIMENSIONS ONLY.

		0m	200m
STATUS	REVISION	DATE	DESCRIPTION
P	P01	07/10/25	For planning and pre-application
P	P02	10/10/25	Boundary amended to north