



Respondent No: 487

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title Mr

Q2. First Name David

Q3. Last Name Fovargue

Q4. Job Title (where relevant) Planning Director

Q5. Organisation (where relevant) Marrons on behalf of Mr Fergus Thomas, Strategic Land Director, of Bellway Strategic Land

[REDACTED]

Q11. Where possible, please select which part of the not answered

Local Plan or accompanying document this
representation relates to?

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

 SWINDON BOROUGH COUNCIL	Swindon Borough Council Local Plan Publication Stage (Regulation 18) Draft Local Plan Representation Form	Ref: (For official use only)
--	---	--

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

For your comments to be taken as a formal submission you are required to state your name and address. In line with the Data Protection Act 2018, Swindon Borough Council will treat and protect your data in accordance with the Act. If you wish to withdraw or amend your personal data, you will need to contact Swindon Borough Council's Planning Policy team either by email

(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
https://www.swindon.gov.uk/directory_record/23261/planning_policy_privacy_notice

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*

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	Mr	Mr
First Name	Fergus	David
Last Name	Thomas	Fovargue
Job Title (where relevant)	Strategic Land Director	Planning Director
Organisation (where relevant)	Bellway Strategic Land	Marrons
Address Line 1	C/O Agent	[REDACTED]
Line 2	[REDACTED]	[REDACTED]
Line 3	[REDACTED]	[REDACTED]
Line 4	[REDACTED]	[REDACTED]
Post Code	[REDACTED]	[REDACTED]
Telephone Number	[REDACTED]	[REDACTED]
E-mail Address	[REDACTED]	[REDACTED]

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:

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

Chapter	Policy SS1	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.

Policy SS1: Swindon's Spatial Approach to Growth

Draft Policy SS1: Swindon's Spatial Approach to Growth needs to be amended to include a reference to these 'other new allocations' which all, except allocation 18-28, appear to be located within or adjoining the Swindon Urban Area, i.e. sustainably located and in accordance with the focus of the spatial strategy.

Please see accompanying representations for further details.

(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.

"Proposed modification to Draft Policy SS1

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:

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);

c) the Strategic Growth Locations of New Eastern Villages, Wichelstowe, Kingsdown, East Wroughton and North Tadpole. 2.

d) The 'Other new allocations' within and adjoining the Swindon Urban Area and at Highworth listed in Appendix 1."

That these site allocations form part of and accord with the spatial strategy set in Policy SS1 is significant.

(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:

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

Chapter	Policy SP2	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.

Part 2 of draft Policy SP2: Homes for the Community needs to be modified to specifically reference the role of and need for the proposed allocations - across the eight strategic growth locations and within the other new site allocations within or adjoining the Swindon Urban Area and at Highworth - to come forward in the context of maintaining a deliverable supply of housing land to ensure that housing needs can be met. This is required to ensure an effective and positively prepared plan (NPPF tests of soundness 36(c) and 36(a) respectively).

Please see accompanying representations for further detail.

(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.

"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.

1. The housing requirement will be met through:

a) The allocation and delivery of x,xxx new homes across the eight strategic growth locations and the other new residential site allocations within an adjoining the Swindon Urban Area and at Highworth, listed in Appendix 1.

⇒ **b)** encouraging and supporting mixed-use development in the Central Area which will include residential uses,

⇒ **c)** supporting proposals for tall buildings where they are in accord with Policy SD5.

⇒ **d)** Supporting proposals for self-and-custom build where they do not conflict with Development Plan policies.

⇒ **e)** continuing to monitor housing delivery to help identify any shortfall or stalled site progress;

⇒ **f)** supporting proposals that meet the needs of specific groups, e.g. Gypsy, Traveller and Travelling Showpersons accommodation, older persons' housing and student accommodation, where proposals meet the policy requirements of this Plan and can show a demonstrable need.

⇒ **g)** seeking to meet Swindon's 'small sites' requirement through identifying suitable sites and supporting policy compliant proposals.

3. The Council will seek to secure 30% affordable housing from major development proposals, in line with Policy HC2.

4. The Council also has a requirement for 35 Gypsy and Traveller pitches and 19 Travelling Showperson plots during the life of the Plan. Proposals for such types of accommodation will be supported where they meet the criteria set out in Policy HC8, where there is a demonstrable need and subject to all other relevant policies of the Plan.

5. In areas where Houses in Multiple Occupation are prevalent, the Council will seek to ensure that issues around their cumulative impacts are addressed."

In addition to amending Policy SP2, a new policy is also recommended, as follows.

New Policy: Other New Site Allocations Within and Adjoining the Swindon Urban Area and at Highworth

To complement growth allocated at the eight strategic growth areas other new site allocations are proposed within and adjoining the Swindon Urban Area and at Highworth.

The following sites are proposed for allocation.

Then list the "Other new site allocations" from Appendix 1, including 18-032 Land at 12 Turnpike Road for approximately 55 dwellings.

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:

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

Chapter	Appendix 1, page 135, proposed allocation 18-032 Land at 12 Turnpike Road	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.

Amendment to the site capacity from 48 dwellings to 55 dwellings

1. Appendix 1, page 135, of the draft Plan identifies the capacity of proposed allocation 18-032 Land at 12 Turnpike Road as 48 dwellings. However, to ensure a Plan which is justified and consistent with national planning policy (tests of soundness NPPF36(b) and 36(d)) proposed allocation 18-032 should be allocated for 55 dwellings, not 48 dwellings, reflecting the requirement of NPPF129 which requires planning policies to make an efficient use of land.
2. Making effective use of land is central to draft Policy SD1: Effective Use of Land, a key part of draft Strategic Policy SP1: Sustainable Development (in paragraph 1 and paragraph 2(a) of the policy). In addition. The explanatory text to draft Policy SS1: Swindon's Spatial Approach to Growth also states that in delivering sustainable development the use of land is to be optimised "*so that land is used efficiently and effectively*" (paragraph 4.2, 2nd bullet point).
3. In its officer recommendation to approve Bellway's outline planning application for site 18-032 - enclosed at Appendix A - no issues have been raised regarding the 55

dwellings proposed for the site. In fact, paragraph 63 of the Officer Report states that:

*"As the application is in outline there are no dwelling elevations, floor plans or set site layout to analyse at this stage. **There is no reason though to suggest that the site will not be capable of accommodating up to 55 dwellings of an appropriate design, scale and layout.**"* (emphasis added).

The suitability and sustainability of proposed allocation 18-032 Land at 12 Turnpike Road

4. This part of Swindon has already been accepted by the Council as a suitable and sustainable location for residential development, with the Council having granted planning permission for 29 dwellings on land immediately adjoining or within proximity to site 18-032 on both Turnpike Road and Kingsdown Lane¹. In addition, the Council has identified the proposed allocation at Kingsdown, which includes significant new investment in highways and community infrastructure (including new primary school and local centre) which further allocations will help to complement.
5. The proposed allocation of 18-032 Land at 12 Turnpike Road is supported by an evidence base which includes a Sustainability Appraisal Interim Report (SAIR) and Strategic Housing Land Availability Assessment (SHLAA).
6. Paragraph 5.4.33, page 30, second bullet of the SAIR identifies that the site well located in transport terms and will help connectivity between Blunsdon and Kingsdown and is therefore supported by the wider strategic context.

¹ Applications: S/22/1724, S/22/0457, S/24/1256, S/OUT/20/0549, S/22/0705, S/21/1444 and S/23/0920 [PINS ref. 3339082].

Extracts from the SAIR

- Sites close to A419/A4311/B4019 junction – namely Land at Turnpike Road, South of Highworth Road and Land at 12 Turnpike Road (230 homes in total). These sites are well located in transport terms and will help to link Broad Blunsdon to the southern Kingsdown 'village'. However, there is a need to question whether remaining land between Broad Blunsdon and Kingsdown will come under development pressure in the near future, notwithstanding: A) the fact that this land is designated as a "Non-coalescence Area"; B) the green infrastructure role of this land linking to the aforementioned central Kingsdown parkland (including noting a public footpath); C) the land has not been promoted as available; and D) a recent major water pipeline.

to a comprehensive scheme and with a view to maximising benefits.

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

7. How the site aligns with planned improvements to local connectivity is demonstrated on the Local Cycling and Walking Infrastructure Plan (LCWIP) plan provided at page 87 of the draft Plan, whereby site 18-032 is in close proximity to the Kingsdown Lane Growth Scheme – Pink (18) and the Secondary Cycle Route (yellow), which route into and via Blunsdon and then on to Tadpole Garden Village via Growth Scheme 19.

Extract from page 87 of the draft Plan (LCWIP schemes)



8. Whilst the SHLAA provides 'amber' ratings for heritage, ecology and the site's location (regarding access to services and facilities), these issues pre-date the progress that has been made during the application's determination and officer recommendation for approval which addresses these matters in detail.

9. In heritage terms, less than substantial harm – at the lower end of the spectrum – arises to the setting of the Grade II Listed Dame School, however through the

incorporation of a large area of open space, sustainable drainage, orchard and new wildlife habitats development can be set well back. The Council considers that the public benefits – most notably the pressing and urgent need for housing – outweigh the impacts to the listed building's setting.

10. In ecology terms, paragraph 18 of the Officer Report makes clear that there no objections are raised.

11. In terms of access to services and facilities, no objections are raised by the Local Highway Authority (LHA), on the basis of the off-site active travel improvements proposed by Bellway and supporting Section 106 contributions towards investment in these improvements as well as local bus services.

12. The proposed allocation will deliver the following benefits for the area:

- 55 new homes to meet local needs, including 30% affordable housing.
- A Local Area for Play (LAP) for younger children, plus investment in open space and sports provision within the wider Blunsdon area.
- Other on-site green spaces including community orchard and habitats for wildlife.
- Investment in active travel, towards walking and cycle routes, complementing and supporting the LCWIP, as well as investment in bus services (including new bus shelter).
- A net gain in biodiversity.

13. The Design and Access Statement (DAS), enclosed at Appendix B, demonstrates how a high quality and attractive scheme can be realised.

The deliverability of proposed allocation 18-032 Land at 12 Turnpike Road

14. A significant benefit of Bellway's proposals for the site is its deliverability, with a 5* housebuilder already invested in bringing it forward.

15. Bellway first came forward with an outline planning application for its scheme at Turnpike Road following pre-application advice, where the Council's planning policy team were seeking housebuilder-led projects for new homes at a scale of 50-100 dwellings. The Council took this approach given the adopted local plan's reliance on

strategic site allocations which had not come forward as envisaged, and the consequential lack of a deliverable 5-year housing land supply.

16. With the planning application now on the agenda for planning committee on 14th October 2025, Bellway is keen to secure an outline planning consent and delivery of this site as quickly as possible. If the Council were to resolve to grant planning permission on 14th October, and a S106 signed and final decision issued by February 2026, then Bellway would seek to submit an application for Reserved Matters no later than the end of Q2 2026. If Reserved Matters approval could be secured by the end of 2026, and the necessary pre-commencement conditions and obligations also discharged, then work could commence on-site in 2027, with a 2-year build completing by the end of 2029.

Please see enclosed representations for further detail.

(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.

Amend the capacity of 18-032 Land at 12 Turnpike Road from 48 to 55 dwellings.

(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:

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

Chapter	Policy HC2: Affordable Housing	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 requirement for 78% of affordable housing to be social rent in draft Policy HC2: Affordable Housing, needs to be justified, in accordance with NPPF test of soundness 36(b). Current policy requires a mix of 70% social rented and 30% intermediate housing.

Please see accompanying representations for further details.

(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.

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 HC3: Accessible Housing	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 requirement for all C3 dwellings to meet M4(2) standards and for a minimum of 2% of dwellings on sites of 0.5ha or 50 units or more to meet the M4(3) standard needs to be justified (NPPF test of soundness 36(b)) with respect to understanding the overall impact on viability, as required by paragraph 007 Reference ID: 56-007-20150327, Revision date: 27 03 2015, of the National Planning Practice Guidance: Housing Optional Technical Standards.

Please see accompanying representations for further details.

(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.

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 ST4: Transport Assessments, Transport Statements and Travel Plans	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.

Part 1 of Draft Policy ST4: Transport Assessments, Transport Statements and Travel Plans needs to be amended to ensure that it accords with national planning policy (NPPF test of soundness 36(d)). At present, the policy wording requires "any" adverse impacts to be mitigated, however NPPF115(d) only concerns the mitigation of "*significant impacts from the development on the transport network*" and NPPF116 sets the threshold at the level of "severe" with respect to the level at which planning applications should be refused with respect to their residual cumulative impacts on the road network.

Please see accompanying representations for further details.

(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.

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	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 consistency between draft Policy SD8: Historic Environment and policies for the historic environment in Chapter 16 of the NPPF should be reviewed to ensure that policy complies with national planning policy (NPPF test of soundness 36(d)). For example, part 3 of draft Policy SD8 refers to "*Proposed developments that bring harm and loss to a heritage asset*" to then be weighed against the public benefits, however NPPF215 only refers to circumstances of "*less than substantial harm*".

Please see accompanying representations for further details.

(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.

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	<input type="checkbox"/>	Policies Map	<input type="checkbox"/>	Evidence base document e.g. the Sustainability Appraisal	<input type="checkbox"/>	Strategic Housing and Economic Land Availability Assessment, page 50 (site s0460)
---------	--------------------------	--------------	--------------------------	---	--------------------------	---

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.

Site s0460

Whilst the SHELAA provides 'amber' ratings for heritage, ecology and the site's location (regarding access to services and facilities), these issues pre-date the progress that has been made during the application's determination and officer recommendation for approval which addresses these matters in detail.

In heritage terms, less than substantial harm – at the lower end of the spectrum – arises to the setting of the Grade II Listed Dame School, however through the incorporation of a large area of open space, sustainable drainage, orchard and new wildlife habitats development can be set well back. The Council considers that the public benefits – most notably the pressing and urgent need for housing – outweigh the impacts to the listed building's setting.

In ecology terms, paragraph 18 of the Officer Report makes clear that there no objections are raised.

In terms of access to services and facilities, no objections are raised by the Local Highway Authority (LHA), on the basis of the off-site active travel improvements proposed by Bellway and supporting Section 106 contributions towards investment in these improvements as well as local bus services.

Please see accompanying representations for further details.

(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.

Amend 'Amber' ratings for heritage, ecology and the site's location to 'Green'.

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.

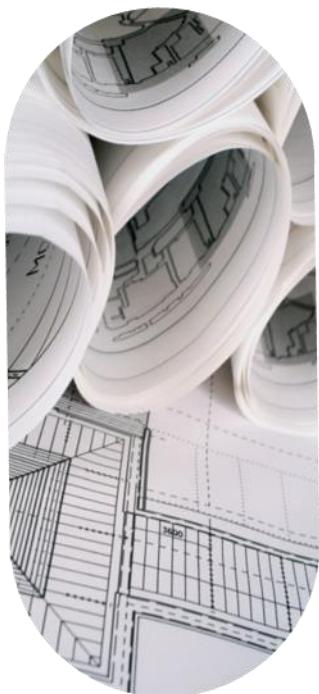


Swindon Borough Council,

New Local Plan 2043: Regulation 18 Consultation

**Representations on behalf of Bellway Strategic Land (part of
Bellway Homes Ltd)**

October 2025





A. Introduction & Summary

1. These representations are submitted by Marrons in response to the draft Swindon New Local Plan 2043 (Regulation 18) consultation, on behalf of Bellway Strategic Land, part of Bellway Homes Ltd (Bellway).
2. Bellway supports the draft Swindon New Local Plan 2043 and, in particular, proposed allocation “18-032 Land at 12 Turnpike Road” for new residential development. This is a sustainable and deliverable site under the control of 5* housebuilder, due to be taken to planning committee with an officer recommendation to grant outline planning permission on 14th October 2025. The Officer Report, enclosed at Appendix A, demonstrates no significant unresolved technical or environmental objections to Bellway’s Site.
3. As explained in these representations, Bellway’s proposals for the site will contribute towards a deliverable supply of homes in the Borough (a requirement of national planning policy) and deliver benefits for the local community in this area, including investment in active travel, public transport and public open space. The sustainability, deliverability and opportunities and benefits in support of allocation 18-032 Land at 12 Turnpike Road are set out in section C of these representations.
4. However, the following modifications are required to the draft Plan to ensure that it best meets the tests of soundness in NPPF36:
 - The role of proposed allocation 18-032 Land at 12 Turnpike Road and the “*Other new site allocations*” listed in Appendix 1 of the draft Plan (page 135) needs to be explicitly set out within the context of the draft Plan’s spatial strategy and its strategic policies. The allocation of 18-032 and other sites therefore needs to be incorporated within draft Policy SS1: Swindon’s Spatial Approach to Growth and draft Policy SP2: Homes for the Community. This is explained further in section B of these representations.
 - The capacity of draft allocation 18-032 Land at 12 Turnpike Road needs increasing from 48 dwellings to 55 dwellings to ensure an efficient and effective use of land in accordance with national planning policy. This reflects Bellway’s own



masterplanning of the Site, its opportunities and constraints. This is explained further in section C of these representations.

- Amendments are required to several development management policies to ensure that they are justified and accord with national planning policy. The need for these amendments is set out in section D of these representations.



B. Spatial Strategy & Site Allocations

Identifying the role of the “Other new allocations” as part of the spatial strategy

5. The role of proposed allocation 18-032 Land at 12 Turnpike Road and the “Other new allocations” listed on page 135 of Appendix 1 of the draft Plan needs to be made explicitly clear within the spatial strategy in complementing the eight strategic growth areas. Policy SS1: Swindon’s Spatial Approach to Growth and Policy SP2: Homes for the Community both need amending to reflect this.

Policy SS1: Swindon’s Spatial Approach to Growth

6. Draft Policy SS1: Swindon’s Spatial Approach to Growth needs to be amended to include a reference to these ‘other new allocations’ which all, except allocation 18-28, appear to be located within or adjoining the Swindon Urban Area, i.e. sustainably located and in accordance with the focus of the spatial strategy. The proposed modification to the policy is as follows:

Proposed modification to Draft Policy SS1

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:*
 - 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);*
 - c) *the Strategic Growth Locations of New Eastern Villages, Wichelstowe, Kingsdown, East Wroughton and North Tadpole. 2.*
- d) The ‘Other new allocations’ within and adjoining the Swindon Urban Area and at Highworth listed in Appendix 1.**



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 sympathetic to local character.*
7. That these site allocations form part of and accord with the spatial strategy set in Policy SS1 is significant.

Policy SP2: Homes for the Community

8. Part 2 of draft Policy SP2: Homes for the Community needs to be modified to specifically reference the role of and need for the proposed allocations - across the eight strategic growth locations and within the other new site allocations within or adjoining the Swindon Urban Area and at Highworth - to come forward in the context of maintaining a deliverable supply of housing land to ensure that housing needs can be met. This is required to ensure an effective and positively prepared plan (NPPF tests of soundness 36(c) and 36(a) respectively).

Proposed modification to Draft Policy SP2

"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.

3. *The housing requirement will be met through:*

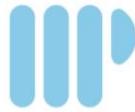
a) The allocation and delivery of x,xxx new homes across the eight strategic growth locations and the other new residential site allocations within an adjoining the Swindon Urban Area and at Highworth, listed in Appendix 1.

a) b) encouraging and supporting mixed-use development in the Central Area which will include residential uses,

b) c) supporting proposals for tall buildings where they are in accord with Policy SD5.

c) d) Supporting proposals for self-and-custom build where they do not conflict with Development Plan policies.

d) e) continuing to monitor housing delivery to help identify any shortfall or stalled site progress;



e) f supporting proposals that meet the needs of specific groups, e.g. Gypsy, Traveller and Travelling Showpersons accommodation, older persons' housing and student accommodation, where proposals meet the policy requirements of this Plan and can show a demonstrable need.

f) g seeking to meet Swindon's 'small sites' requirement through identifying suitable sites and supporting policycompliant proposals.

3. *The Council will seek to secure 30% affordable housing from major development proposals, in line with Policy HC2.*

4. *The Council also has a requirement for 35 Gypsy and Traveller pitches and 19 Travelling Showperson plots during the life of the Plan. Proposals for such types of accommodation will be supported where they meet the criteria set out in Policy HC8, where there is a demonstrable need and subject to all other relevant policies of the Plan.*

5. *In areas where Houses in Multiple Occupation are prevalent, the Council will seek to ensure that issues around their cumulative impacts are addressed.”*

New Policy: Other New Site Allocations Within and Adjoining the Swindon Urban Area and at Highworth

To complement growth allocated at the eight strategic growth areas other new site allocations are proposed within and adjoining the Swindon Urban Area and at Highworth.

The following sites are proposed for allocation.

Then list the “Other new site allocations” from Appendix 1, including 18-032 Land at 12 Turnpike Road for approximately 55 dwellings.



C. Role of Proposed Allocation 18-032 Land at 12 Turnpike Road

Amendment to the site capacity from 48 dwellings to 55 dwellings

9. Appendix 1, page 135, of the draft Plan identifies the capacity of proposed allocation 18-032 Land at 12 Turnpike Road as 48 dwellings. However, to ensure a Plan which is justified and consistent with national planning policy (tests of soundness NPPF36(b) and 36(d)) proposed allocation 18-032 should be allocated for 55 dwellings, not 48 dwellings, reflecting the requirement of NPPF129 which requires planning policies to make an efficient use of land.
10. Making effective use of land is central to draft Policy SD1: Effective Use of Land, a key part of draft Strategic Policy SP1: Sustainable Development (in paragraph 1 and paragraph 2(a) of the policy). In addition. The explanatory text to draft Policy SS1: Swindon's Spatial Approach to Growth also states that in delivering sustainable development the use of land is to be optimised "*so that land is used efficiently and effectively*" (paragraph 4.2, 2nd bullet point).
11. In its officer recommendation to approve Bellway's outline planning application for site 18-032 - enclosed at Appendix A - no issues have been raised regarding the 55 dwellings proposed for the site. In fact, paragraph 63 of the Officer Report states that:

*"As the application is in outline there are no dwelling elevations, floor plans or set site layout to analyse at this stage. **There is no reason though to suggest that the site will not be capable of accommodating up to 55 dwellings of an appropriate design, scale and layout.**"* (emphasis added).

The suitability and sustainability of proposed allocation 18-032 Land at 12 Turnpike Road

12. This part of Swindon has already been accepted by the Council as a suitable and sustainable location for residential development, with the Council having granted planning permission for 29 dwellings on land immediately adjoining or within proximity



to site 18-032 on both Turnpike Road and Kingsdown Lane¹. In addition, the Council has identified the proposed allocation at Kingsdown, which includes significant new investment in highways and community infrastructure (including new primary school and local centre) which further allocations will help to complement.

13. The proposed allocation of 18-032 Land at 12 Turnpike Road is supported by an evidence base which includes a Sustainability Appraisal Interim Report (SAIR) and Strategic Housing Land Availability Assessment (SHLAA).
14. Paragraph 5.4.33, page 30, second bullet of the SAIR identifies that the site well located in transport terms and will help connectivity between Blunsdon and Kingsdown and is therefore supported by the wider strategic context.

Extracts from the SAIR

- Sites close to A419/A4311/B4019 junction – namely Land at Turnpike Road, South of Highworth Road and Land at 12 Turnpike Road (230 homes in total). These sites are well located in transport terms and will help to link Broad Blunsdon to the southern Kingsdown 'village'. However, there is a need to question whether remaining land between Broad Blunsdon and Kingsdown will come under development pressure in the near future, notwithstanding: A) the fact that this land is designated as a "Non-coalescence Area"; B) the green infrastructure role of this land linking to the aforementioned central Kingsdown parkland (including noting a public footpath); C) the land has not been promoted as available; and D) a recent major water pipeline.

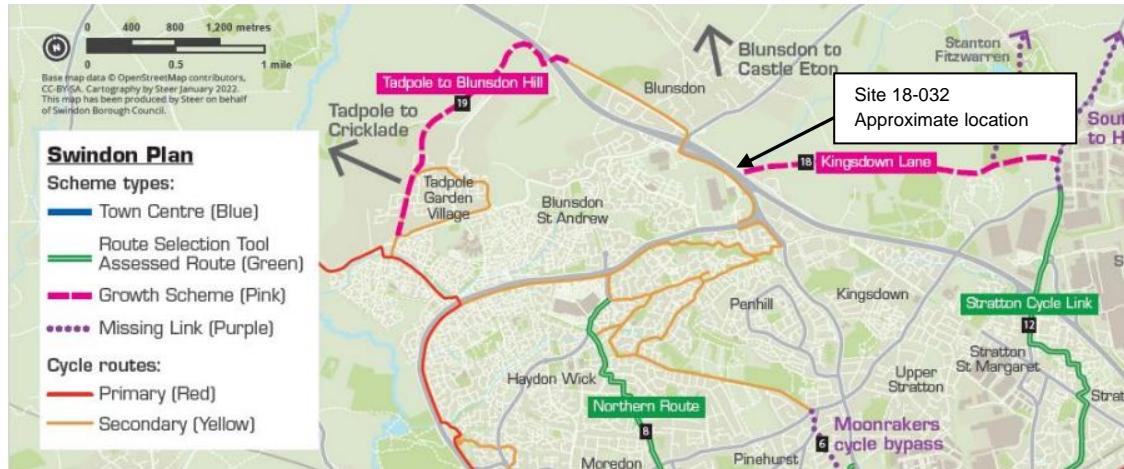
to a comprehensive scheme and with a view to maximising benefits.

- 5.4.34. Overall, these sites are quite strongly supported, given the strategic context. It will be important to ensure a strategic approach to growth in this area that acknowledges the need to consider growth at Broad Blunsdon and Kingsdown with a strategic perspective.
15. How the site aligns with planned improvements to local connectivity is demonstrated on the Local Cycling and Walking Infrastructure Plan (LCWIP) plan provided at page 87 of the draft Plan, whereby site 18-032 is in close proximity to the Kingsdown Lane Growth Scheme – Pink (18) and the Secondary Cycle Route (yellow), which route into and via Blunsdon and then on to Tadpole Garden Village via Growth Scheme 19.

¹ Applications: S/22/1724, S/22/0457, S/24/1256, S/OUT/20/0549, S/22/0705, S/21/1444 and S/23/0920 [PINS ref. 3339082]).



Extract from page 87 of the draft Plan (LCWIP schemes)



16. Whilst the SHLAA provides 'amber' ratings for heritage, ecology and the site's location (regarding access to services and facilities), these issues pre-date the progress that has been made during the application's determination and officer recommendation for approval which addresses these matters in detail.
17. In heritage terms, less than substantial harm – at the lower end of the spectrum – arises to the setting of the Grade II Listed Dame School, however through the incorporation of a large area of open space, sustainable drainage, orchard and new wildlife habitats development can be set well back. The Council considers that the public benefits – most notably the pressing and urgent need for housing – outweigh the impacts to the listed building's setting.
18. In ecology terms, paragraph 18 of the Officer Report makes clear that there no objections are raised.
19. In terms of access to services and facilities, no objections are raised by the Local Highway Authority (LHA), on the basis of the off-site active travel improvements proposed by Bellway and supporting Section 106 contributions towards investment in these improvements as well as local bus services.



20. The proposed allocation will deliver the following benefits for the area:

- 55 new homes to meet local needs, including 30% affordable housing.
- A Local Area for Play (LAP) for younger children, plus investment in open space and sports provision within the wider Blunsdon area.
- Other on-site green spaces including community orchard and habitats for wildlife.
- Investment in active travel, towards walking and cycle routes, complementing and supporting the LCWIP, as well as investment in bus services (including new bus shelter).
- A net gain in biodiversity.

21. The Design and Access Statement (DAS), enclosed at Appendix B, demonstrates how a high quality and attractive scheme can be realised.

The deliverability of proposed allocation 18-032 Land at 12 Turnpike Road

22. A significant benefit of Bellway's proposals for the site is its deliverability, with a 5* housebuilder already invested in bringing it forward.

23. Bellway first came forward with an outline planning application for its scheme at Turnpike Road following pre-application advice, where the Council's planning policy team were seeking housebuilder-led projects for new homes at a scale of 50-100 dwellings. The Council took this approach given the adopted local plan's reliance on strategic site allocations which had not come forward as envisaged, and the consequential lack of a deliverable 5-year housing land supply.

24. With the planning application now on the agenda for planning committee on 14th October 2025, Bellway is keen to secure an outline planning consent and delivery of this site as quickly as possible. If the Council were to resolve to grant planning permission on 14th October, and a S106 signed and final decision issued by February 2026, then Bellway would seek to submit an application for Reserved Matters no later than the end of Q2 2026. If Reserved Matters approval could be secured by the end of 2026, and the necessary pre-commencement conditions and obligations also



discharged, then work could commence on-site in 2027, with a 2-year build completing by the end of 2029.



D. Comments on the Soundness of Draft Development Management Policies

Draft Policy HC2: Affordable Housing

25. The requirement for 78% of affordable housing to be social rent in draft Policy HC2: Affordable Housing, needs to be justified, in accordance with NPPF test of soundness 36(b). Current policy requires a mix of 70% social rented and 30% intermediate housing.

Draft Policy HC3: Accessible Housing

26. The requirement for all C3 dwellings to meet M4(2) standards and for a minimum of 2% of dwellings on sites of 0.5ha or 50 units or more to meet the M4(3) standard needs to be justified (NPPF test of soundness 36(b)) with respect to understanding the overall impact on viability, as required by paragraph 007 Reference ID: 56-007-20150327, Revision date: 27 03 2015, of the National Planning Practice Guidance: Housing Optional Technical Standards.

Draft Policy ST4: Transport Assessments, Transport Statements and Travel Plans

27. Part 1 of Draft Policy ST4: Transport Assessments, Transport Statements and Travel Plans needs to be amended to ensure that it accords with national planning policy (NPPF test of soundness 36(d)). At present, the policy wording requires “any” adverse impacts to be mitigated, however NPPF115(d) only concerns the mitigation of “*significant impacts from the development on the transport network*” and NPPF116 sets the threshold at the level of “severe” with respect to the level at which planning applications should be refused with respect to their residual cumulative impacts on the road network.

Draft Policy SD8: Historic Environment

28. The consistency between draft Policy SD8: Historic Environment and policies for the historic environment in Chapter 16 of the NPPF should be reviewed to ensure that policy complies with national planning policy (NPPF test of soundness 36(d)). For



example, part 3 of draft Policy SD8 refers to “*Proposed developments that bring harm and loss to a heritage asset*” to then be weighed against the public benefits, however NPPF215 only refers to circumstances of “*less than substantial harm*”.



E. Summary & Conclusions

29. These representations set out Bellway's support for the draft New Swindon Local Plan 2043 and the proposed allocation of its Site at 12 Turnpike Road,
30. The representations demonstrate the sustainability and deliverability of the proposed allocation and the opportunities and benefits that it can secure for the community in this area, including provision of affordable housing, investment in active travel infrastructure and new public open space.
31. The comments and proposed modifications set out these representations are to maximise the draft Local Plan's effectiveness and consistency with national planning policy.
32. Bellway looks forward to continuing to support the Council and key stakeholders, including the local community, to bring forward proposed allocation 18-032 at the earliest opportunity to help contribute towards the housing needs of Swindon's residents.



Appendix A – Land at 12 Turnpike Road, Officer Report (recommendation to grant outline planning permission)



SWINDON
BOROUGH COUNCIL

COMMITTEE REPORT

Item Number: 7

Application Number: S/OUT/19/1742/TB

Ward: Blunsdon And Highworth

Parish: Blunsdon Parish Council

Proposal: Outline application for the erection of up to 55no. dwellings - Access not reserved.

Site Location: Land Adjacent To 12 Turnpike Road, Blunsdon, Swindon

Case Officer: Tom Buxton

Agent:

Mr David Fovargue

Marrons Planning

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Applicant

Mr William Hodgson

Bellway Homes Limited

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Background:

1. This application has been called to Planning Committee by Blunsdon Parish Council.
2. This application was originally submitted in late 2019 but stalled for a long period as a result of a holding response from National Highways regarding potential impact to the strategic road network (A419).

Summary of Recommendation:

3. That the Chief Planning Officer be authorised to **GRANT** outline planning permission subject to:
 - a) The completion of a S106 Deed to secure the planning obligations that are material to the decision (as set out in the Infrastructure Requirements & Heads of Terms section of this report); and
 - (b) The planning conditions set out in this report with delegated authority to make non-material amendments, additions or omissions to those conditions before issuing formal consent as may be necessary.
4. In the event that the S106 Deed is not completed by 31st February 2026 the Chief Planning Officer be delegated authority to refuse planning permission, extend this timeframe or refer the application back to Planning Committee for determination.

The Proposal:

5. This application seeks outline planning permission for the erection of up to 55 dwellings with all matters reserved except for access on land adjacent to 12 Turnpike Road, Blunsdon.
6. Although layout is a matter reserved for future consideration an indicative concept plan has been provided to demonstrate how the site could be laid out. This shows the potential for a mixture

of short terraces and detached houses accessed by shared surface roads as well as private driveways plus the provision of open space, sustainable drainage and planting.

7. Highway access would be taken from Turnpike Road to the north west corner of the site with the indicative masterplan also showing the provision of pedestrian/cycle connectivity to the southern corner.

The Site and Surroundings:

8. The site is a very roughly rectangular shaped plot of land located to the east of Turnpike Road, Blunsdon. The plot is 2.11 hectares in area and is a largely open paddock, but also contains some outbuildings, some garden land and a number of internal trees plus boundary planting.

9. To the south west boundary are a number of dwellings fronting Turnpike Road, one of which is a listed building, to the south is the access road to a new residential development that sits (in part) to the eastern boundary. Beyond the remaining part of the eastern boundary are open fields. To the north is a dwelling and associated curtilage (No. 12 Turnpike Road) which is set back from Turnpike Road, beyond which is an open field. Lastly beyond the access road to the southern boundary is a new residential development under construction.

Representations:

10. Since the original submission of the application back in 2019 there have been several consultation stages as a result of revised and additional details. The below is a summary of the representations received, noting that there is a large span of time between some of these (i.e. the first representations received were in December 2019 with the most recent ones being in September this year and noting that the consultee summaries listed below are that of the most recent responses). The material planning considerations raised are covered in the 'discussion' section below. The representations from both the public and consultees can be read in full on the public access (Planning) pages of the Council's website ([S/OUT/19/1742 | Outline application for the erection of up to 55no. dwellings - Access not reserved. | Land Adjacent To 12 Turnpike Road Blunsdon Swindon SN26 7EA](#))

11. Public:

A total of 4 representations of objection received from the public raising the following as objections:

- Road/highway safety
- Traffic congestion (e.g. Cold Harbour)
- Loss of green fields/green buffer
- Impact on/loss of wildlife
- Loss of privacy
- Noise
- Security
- Drainage/flooding
- Over-development of Blunsdon (particularly considering other consent schemes)
- Contrary to Local Plan (not allocated) and Blunsdon Neighbourhood Plan
- Impact upon character and historic individuality of houses on Turnpike Road
- Reference to application at adjacent site (S/OUT/19/0467)
- No space at schools and doctor's surgery
- Village facilities/infrastructure can't cope (sewage, power, water)

12. Parish Council:

Object to application and raise following points:

- Density equates to 29 dph

- Access is difficult with a sharp turn
- Pollution
- No SuD or sewage plan
- Length of Thames Water works to connect
- Traffic study is not relevant
- Impact upon A419 junction
- Conservation officer has concerns
- Bus stop is more than 400m away
- School and surgery are over 2km away
- Future bridge will not be preferred route
- Support Highway comments

13. **Housing:**

Glad to see affordable housing is proposed and this should 30% (17 units) with 70/30 split between rented and Intermediate with further recommendations for dwelling types, clustering and to appear tenure blind.

14. **Highways:**

Content that an acceptable site access strategy is proposed.

After initial objections were made regarding sustainable accessibility of the site additional supporting information has been provided by the applicant including off-site pedestrian and cycle infrastructure improvements. Whilst these are deemed to not significantly improve accessibility to the site they will make minor improvements and hence it is requested that contributions towards delivering these improvements in addition to wider ones such as improvements to the bus service and towards the Blunsdon to South Marston strategic cycleway.

In terms of development traffic impact note that National Highways' (NH) view that the Lady Lane improvement works would allow 375 dwellings to come forward ahead of the Kingsdown bridge without any impact upon the strategic road network (SRN). That position is unchanged. It is also noted that further modelling at a coarse level was carried out to look at impacts on the local road network considering a position of 'only' 225 dwellings in/around Blunsdon (rather than the 375 dwelling threshold that defines SRN impacts). Recent resolutions to grant a total of 225 dwellings at Sams Land and further along Turnpike Road have recently been reached and hence potential local road impacts beyond this 225 figure need to be considered. Reference is made to the NH modelling of journey times within the vicinity of the Cold Harbour junction albeit that this does not specifically assess the implications of a further 55 dwellings. In summary feel unable to recommend application be refused on grounds of the effect of traffic related with 55 dwellings. Whilst traffic congestion on the B4109 is likely to worsen it is unlikely to be a level that would warrant refusal and therefore no objections are raised subject to suggested conditions and obligations.

15. **Lead Local Flood Authority (LLFA):**

No objections subject to suggested conditions.

16. **Landscape:**

No objections subject to suggested condition.

17. **Urban Design:**

In urban design terms, it is considered that this scheme fails to justify the creation of good quality placemaking for its rural context. It creates the appearance of an urban scheme, less suited to a village fringe or scattered dwelling location and is considered uncharacteristic and unsympathetic to the built form and landscape context which currently surrounds the area.

18. Ecology:

After initial concerns being raised additional supporting information was provided and as a result no objections are raised subject to suggested conditions.

19. Conservation:

The scheme is not appropriate from a historic environment perspective due to the harm caused to the significance of the listed Dame School from development within its setting. The lack of detail in the plans with regards to height is also a concern which further amplifies the harm caused.

20. Education:

No objections raised but request financial contributions towards primary and secondary education in attempt to ensure there are a sufficient number of school places available at the right time and place.

21. County Archaeologist:

Following the archaeological evaluation there are no further archaeological requirements.

22. Contaminated Land:

No objection in principle to the application subject to suggested conditions.

23. Environmental Health:

The development is deemed to be acceptable in principle subject to conditions.

24. National Highways:

Numerous consultee responses over the lifespan of the application each setting out a holding response and requesting that the application not be approved for a (rolling) set time period to allow time for the impact of the development on the safe and efficient operation of the A419 trunk road to be assessed and understood and necessary mitigation agreed.

Further to the above the most recent response sets out no objections subject to suggested conditions/delivery of highway mitigation.

25. Natural England:

An appropriate assessment in relation to North Meadow and Clattinger Farm Special Area of Conservation (SAC) has been forwarded to Natural England for comment and at the time of writing no response has been received. An update on this will be provided to Members at the Committee meeting.

26. Environment Agency:

This application is one that do not wish to be consulted on as it falls outside of relevant categories for consultation.

27. Thames Water:

Have identified an inability of the existing foul water and water network infrastructure and thus request appropriate conditions be imposed. Advice also offered regarding building within 5m of strategic water main.

28. North Wiltshire Swifts:

No objections but recommend use of internal swift bricks and ask that provision of such be conditioned.

Relevant Planning Policy and Guidance:**Adopted Local Plan 2026**

29. The Swindon Borough Local Plan (SBLP) 2026 was adopted on 26th March 2015. The following adopted Swindon Local Plan 2026 policies are considered to relevant to this application:

- SD1: Sustainable Development Principles
- SD2: Sustainable Development Strategy
- SD3: Managing Development
- DE1: High Quality Design
- DE2: Sustainable Construction
- HA1: Mix, Types and Density
- HA2: Affordable Housing
- HA3: Wheelchair Accessible Housing
- TR1: Sustainable Transport Networks
- TR2: Transport and Development
- IN1: Infrastructure Provision
- CM1: Education
- EN3: Open Space
- EN4: Biodiversity and Geodiversity
- EN5: Landscape Character and Historical Landscape
- EN6: Flood Risk
- EN7: Pollution
- EN10: Historic Environment and Heritage Assets
- NC5: Kingsdown

30. The current Local Plan for the Borough of Swindon for the period to 2036 is under Review. The Local Development Scheme (March 2025) sets out the anticipated timetable for the progression of the New Local Plan.

31. Also of relevance is Swindon Borough Council's adopted: Swindon Residential Design Guide (SRDG) (2016), adopted Parking Standards for New Development (2021) and adopted Swindon Borough Council's Landscape Character Supplementary Planning Guidance.

32. In addition the Blunsdon East Neighbourhood Plan (BENP) was 'made' in 2021 and therefore forms part of the development plan. Of relevance to this application are the following policies:

BENP Policy 1: Allocation of Sites for Housing

BENP Policy 2: Housing Development on non-allocated sites.

BENP Policy 3: Development in the countryside

National Planning Policy Framework (NPPF)

33. The latest National Planning Policy Framework came into force in December 2024. It sets out the Government's planning policies for England and how these are expected to be applied.

34. Of particular relevance are sections: 2 'Achieving sustainable development', 5 'Delivering a sufficient supply of homes', 12 'Achieving well-designed places', 15 'Conserving and enhancing the natural environment' and 16 'Conserving and enhancing the historic environment'.

Relevant Planning History:

35. Whilst there is no relevant planning history to the site itself it is advised that the land immediately to the east was granted planning permission in 2023 for 5 dwellings under reference S/22/1724). To the south of the site planning permission for 5 dwellings was granted in 2024 under reference S/22/0457. The eastern development has been constructed and the southern one is under

construction. It is also noted that there is a live outline planning application (S/OUT/19/0467) for up to 80 dwellings on land immediately to the north

Procedural Matters:

EIA Screening:

36. The proposal falls within the definition of development under Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, specifically Table 10 (b) 'Urban Development Projects', however the proposal does not exceed the number of dwellings and development area thresholds where EIA may be required. The proposed development by virtue of its scale, known site constraints and the likely assessed impacts of development individually and cumulatively, is such that no EIA screening or assessment is required.

Discussion:

37. The relevant planning considerations with regard to the assessment of the application are the principle of the development, the impact upon the character of the area, highway implications and residential amenity and in these respects whether the proposals are in accordance with the provisions of the relevant policies of the Swindon Borough Local Plan 2026, the National Planning Policy Framework and Planning Practice Guidance. Other issues raised within the representations received will also be covered.

Principle of Development:

38. The Development Strategy is defined in adopted SBLP Policy SD2. Urban concentration supports key government objectives for sustainable development in the most accessible locations, whilst protecting the best of the countryside.

39. Policy SD2 delineates between the parts of the Borough in which the principle of development would be generally acceptable (within settlements) and those where it generally would not (in the countryside). The policy limits development in the countryside, defined as those areas that are not within a settlement boundary.

40. The application site is located outside of the Blunsdon settlement boundary. It is therefore located in open countryside (in policy terms) and thus the development is in conflict with Policy SD2 of the SBLP, in that none of the exception criteria are met. However it must also be considered that the site is by no means isolated and sits near to much other residential development including newly built and under construction schemes immediately to the south and east as well as existing development along Turnpike Road to the north, west and further to the south. The site is also located in relative close proximity to the Kingsdown Strategic Allocation which sits to the south and east. In reality therefore the site is not truly in the open countryside. Whilst the new Swindon Local Plan is still at an early stage (Regulation 18) it is noted that it includes the site as a potential housing allocation.

41. At the time of writing the Council cannot currently demonstrate a five-year supply of deliverable housing land. Paragraph 11 (part d) of the NPPF is therefore of relevance and states that where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, permission should be granted unless:

- The application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development; or
- Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination

Footnote 8 of paragraph 11 confirms that for applications involving the provision of housing, situations where the local planning authority cannot demonstrate a five year supply of deliverable housing sites, then policies which are most important for determining the application are out-of-date.

42. The current lack of a demonstrable 5-year housing supply is not in itself a reason for approval. Rather, those local policies which concern the provision of housing cannot alone be the basis of a refusal, and the proposal has to be assessed against the policies within the NPPF taken as a whole. In this instance the element of Local Plan Policy SD2 referring to settlement boundaries cannot be considered as reason for refusal alone.

43. The site is not allocated for housing under Policy 1 of the BENP (Allocation of sites for housing) and as the site falls outside of the settlement boundary and is not considered a rural exception site Policy 2 of the BENP (Housing Development on non-allocated sites) is not applicable. Policy 3 of the BENP deals with development in the countryside and thus is applicable. The policy details that development in such areas shall be strictly controlled in accordance with policies in the development plan. These elements have already been covered above. Policy 3 also requires that the character and identity of Blunsdon village will be preserved and enhanced by requiring developments to comply with a number of criteria. Firstly there is the requirement to ensure Blunsdon remains a separate and distinct entity separated from the Swindon urban area. It is not considered that this development would harm the separate entity of Blunsdon. As detailed above the site is not isolated and borders/is very near to existing developments and brings built development no closer to Swindon/the A419 than at present, a boundary which will continue to keep Blunsdon and Swindon separate. Secondly the policy requires respect to be paid to the local landscape character including its setting and views into and out from the village. As detailed above, this is not an isolated site in terms of surrounding development. More will be detailed on this matter in the landscape section below. Thirdly the policy requires respect to be paid to the two Blunsdon conservation areas by conserving their character. The development is some distance from these conservation areas and is separated by existing built development. Lastly the policy requires that where there is potential for development as set out in this policy which results in harmful impacts, that appropriate mitigation measures are proposed. Whilst it is not considered that there will be unacceptable impacts as detailed above it is noted that mitigation in terms of soft landscaping to minimise impact will be secured as part of the future reserved matters application.

44. The village of Broad Blunsdon includes some facilities in a shop, café, place of worship, village hall, doctor's surgery, school, pub, hotel and recreation ground. The development is located to the south of the 'village centre' with the pub for example being located approximately 1250m (walking distance) away. Despite this it still could be argued that the proposal complies with paragraph 83 (Rural Housing) of the NPPF which details: 'To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities' i.e. the residents of the new houses supporting the shop, café, pub etc through additional spending.

45. Before a decision can be made on the overall acceptability of the principle of development an assessment of the impacts of the scheme has to be carried out.

Impact on Landscape/Countryside:

46. In landscape terms the site is outside of the any settlement boundary and within the Mid Vale Ridge Landscape Character Area. The adopted SBLP policy EN5 (Landscape Character and Historic Landscape) states that development will only be permitted when the intrinsic character and local distinctiveness of landscape within the Borough are protected, conserved and enhanced. Similarly the NPPF requires the protection of valued landscapes.

47. In assessing the landscape impact the fact that the site borders much existing built development is an important consideration here, as is the relative close proximity of the Kingsdown allocation, which will deliver a total of 1,650 homes plus local centre and school (Policy NC5). As such, whilst the land may be considered to be in the 'open countryside' in the context of the adopted SBLP in reality it borders much existing development and is close to allocated future development. Considering this it is felt that the development will not unacceptably impact on the Mid Vale Ridge Landscape Character Area or the wider landscape setting of Blunsdon.

48. The indicative concept plan shows that it will be possible to retain much of the existing north, east and west boundary planting as well as some of the internal trees as well as there being the realistic potential for additional meaningful planting in the areas of open space. This can be ensured through the future reserved matters submission.

49. As a result of the above it is not considered that there will be any significant landscape impacts and therefore the proposal is compliant with Policy EN5 of the SBLP and the NPPF in this regard.

Arboriculture:

50. The application is supported by an arboricultural assessment which sets out that the vast majority of trees on the site fall under the 'C' category, meaning that they are judged to be of low quality/value. The trees/grouped trees that fall under category 'B' (moderate quality/value) are to be retained with there being no protected or category 'A' trees currently present. Despite the categorisation of many of the trees/hedges to be category 'C' ones it is evident that 15 of the 49 will still be retained. As detailed above the indicative concept plan also shows realistic scope to mitigate for the loss of these through new tree planting within the development including within the areas of open space. Again, these can be secured through the late reserved matters application. Taking this into consideration plus that the arboricultural assessment shows the ability to safeguard the retained trees during construction (with protection measures to be conditioned) it is concluded that the development is acceptable in this regard.

Highway Access and Safety:

51. Policies TR1 and TR2 of the adopted Swindon Borough Local Plan 2026 seek to ensure access for developments that is appropriate to the scale, type and location of the proposal without detriment to highway safety, traffic movement and the local environment.

52. As access is a matter that is not reserved, consideration needs to be given to the appropriateness of the proposed highway access point onto Turnpike Road. The plans show an access point to the north west side of the site, adapting the existing vehicular access point to No. 12 Turnpike Road. The Principal Transport Manager has raised no objections to the access and it is evident that it is suitable to serve a development of this size. In order to ensure permeability in terms of pedestrian movement the indicative masterplan also shows a footpath connection to the south west corner of the site onto the more southern part of Turnpike Road.

53. Car parking and the form and layout of the internal access roads will form part of later reserved matters submissions. There is no reason at this stage though to suggest that it would not be possible to deliver appropriate parking levels and an acceptable road layout.

54. In terms of the sustainability/accessibility of the site Policies SD1, DE1 and TR2 of the adopted SBLP emphasise that development should be accessible by walking, cycling and/or public transport and designed to reduce the need to travel. The adopted SRDG also encourages the

reduction in need to travel and that developments are well located. The NPPF also encourages sustainable transport solutions. As acknowledged above the village of Blunsdon has a shop, café, church, school and pub however these range from approximately 1250m – 1750m away. On this basis, whilst not attractive to all there is at least some opportunity for future residents to walk or cycle to the village services. To reach other services and employment residents would be unlikely to encouraged to walk/cycle due to the distances involved however there is a bus stop in the village (approximately 425m away) which provides access to the town centre as well as the Northern Orbital Centre and north Swindon. Although the service does not appear to be very frequent it does provide a realistic opportunity for new residents to utilise bus travel for work and to reach larger shops and services. It must also be pointed out that Paragraph 110 of the NPPF acknowledges that opportunities to maximise sustainable transport solutions will vary between urban and rural areas (and this should be taken into account in decision-making). Furthermore the relative close proximity of the Kingsdown allocation should also be taken into account in that this will deliver further services as well as improved public transport connections. In addition to this, as recommended by the Principal Transport Manager contributions will be secured through a Section 106 agreement to improve sustainable transport facilities/links (e.g. bus shelter improvements, bus service improvements, footpath improvements and active travel corridor improvements) which will go some way towards encouraging sustainable transport methods. In particular with regard to the bus service enhancement contribution alongside funding secured from other Blunsdon permissions, there is a very real opportunity to deliver a bus service frequency increase ahead of the more significant bus service improvements that the Kingsdown scheme will bring.

55. In conclusion whilst walking/cycling is unlikely to be an attractive option for residents to reach wider employment and service opportunities there is the ability to utilise a bus service for this. It is acknowledged though that at present this service is not very frequent, which could put some people off and hence this does weigh against the sustainable travel credentials of the site. Importantly though there are some services within the village that can realistically be accessed on foot or by bike plus the bus service improvements are to be secured.

56. As detailed in part in the representations section above National Highways (then Highways England) originally set out a holding response to the application requesting that there be no positive determination of it prior to the impact of the development on the A419 being fully modelled and understood in addition to appropriate mitigation measures being identified. National Highway's concerns related/relate to the operation and safety of the A419(T) Blunsdon junction which forms part of the Strategic Road Network (SRN). The A419 Blunsdon Junction currently operates under constraint during weekday peak hours, with queues extending from the A419 off-slips onto the mainline. National Highways developed a VISSIM model to assess the impact and released it to developers in the area to use. They also commissioned WSP to develop an updated Vissim microsimulation model of the A419 Blunsdon Interchange area (Technical Note – March 2024). The initial model assessed the Persimmon Homes/Primegate Properties Kingsdown planning application (reference S/OUT/17/1821) and follows the agreement of a phased package of mitigation measures for the development. The updated model also assesses a number of other live planning applications in the area, including the development proposed as part of this application. It concludes by advising that the subsequent addition of the live applications in the Blunsdon area is shown to have a material impact – significantly extending queues for the northbound off-slip during both the AM and PM peak hours which represents a material safety concern for NH, with queues for the northbound off-slip having a notable impact on mainline traffic conditions on the A419. It shows that despite the delivery of agreed and assumed mitigation schemes (Tadpole and Kingsdown Phase 1) additional mitigation is likely to be necessary to support further development in the Blunsdon area ahead of delivery of the Kingsdown bridge.

The most recent National Highways response (April 2025) sets out that delivery of the full mitigation

measures for the Kingsdown development (S/OUT/17/1821), including a new highway bridge over the A419, will enable additional development beyond the Kingsdown site to come forward in the Blunsdon area. However, in the absence of a confirmed date for the delivery of these measures, it is necessary for other planning applications in the area to provide interim mitigation that will manage immediate SRN impacts. The evidence demonstrates that the delivery of the Lady Lane (B4534) widening scheme in addition to two schemes (reconfiguration and signalisation of the Cold Harbour junction and SCOOT signal controls) which form part of the wider Kingsdown planning application (S/OUT/17/1821) would enable the delivery of the first 450 dwellings at Kingsdown and up to a further 375 dwellings on other live applications in the Blunsdon area. At this time, there is sufficient capacity as part of the 375 dwellings to allow for this application (noting that a total of 225 dwellings were granted subject to Section 106 agreements at Planning Committee last month). National Highways therefore have no objection to the proposed development, subject to the inclusion of planning conditions or other appropriate mechanisms to secure the delivery of the Lady Lane (B4534) widening scheme. This will be secured as an obligation within the legal agreement, which will also restrict occupations until the two other mitigation schemes are delivered.

The mitigation measures, which will need to be delivered to be able to accommodate the development consist of the following:

Scheme A - The Kingsdown 'Phase 1' mitigation works (unless first delivered by Kingsdown):

- Reconfiguration and signalisation of the Cold Harbour junction.
- Implementation of a SCOOT signal system along the corridor between the Cold Harbour junction and the A4198 Thamesdown Drive/ Salzgitter Drive junction.

Scheme B - the Turnpike Road Mitigation Scheme':

- Scheme to widen Lady Lane between the Blunsdon bridge and the junction with the slip roads for the A419 northbound carriageway, Technical Note Appendix B - LADY LANE HIGHWAY IMPROVEMENTS.

OR an alternative scheme of mitigation that has first been agreed in writing by the Local Planning Authority in consultation with National Highways).

The delivery of these are required prior to commencement of works on site.

57. The modelling of strategic road network impacts was extended to assess, at a coarse level, the potential for impacts on the local road network. The modelling considered a position with 'only' 225 new dwellings in and around Blunsdon, rather than the 375 dwelling threshold that defines SRN impacts. The 225-dwelling scenario was a test scenario to reflect the two development schemes that were most active in seeking mitigation solutions. Those two development schemes were consented (subject to S106 agreements securing the delivery of the agreed highway mitigation package) at Planning Committee last month.

58. To help assess the extent of potential local road impacts with new development beyond the 225 dwellings recently consented, the NH VISSIM model has shown results in terms of journey time along the B4019, between Sams Lane and the Coldharbour junction, as an indicator of congestion levels on the B4019. The results show that the implementation of the Kingsdown Phase 1 development (450 dwellings) plus its Phase 1 mitigation (Coldharbour junction and Thamesdown Drive traffic signals) would significantly reduce congestion on the westbound B4019, as measured by the journey time between Sams Lane and the Coldharbour junction, the existing (2022) average vehicle travelling time of 269 seconds reducing to 131 seconds. The implementation on top of that of the recently consented 225 dwellings, with the additional mitigation (Lady Lane widening) would

remove some of the benefit of the Kingsdown improvements, although congestion on the B4019 will be less than it is now, with a modelled journey time of 191 seconds.

The effects of the further 55 dwellings the subject of this application has not been specifically modelled. The closest scenario is one in which a further 250 dwellings is added to Blundson which does show significant worsening of congestion on the B4019. Clearly though there is a big difference between the modelled additional 250 dwelling total and the 55 dwellings proposed under this application. Whilst this number (55) would increase congestion levels on the local road network the Principal Transport Manager has concluded that this would unlikely be to a level that would warrant refusal of the application.

Residential Amenity:

59. Policy DE1 of the Swindon Local Plan 2026 requires consideration of amenity in terms of light, privacy, outlook, noise, disturbance, smell, pollution and space when considering development proposals. The SRDG also requires consideration of amenity as does the NPPF.

60. The nearest residential properties to the application site are located along Turnpike Road to the south west boundary, No. 12 Turnpike Road to the north and the new/under construction developments to the southern and part eastern boundaries. Whilst layout is a matter reserved from consideration at this outline stage the indicative concept plan suggests that it will be possible to meet minimum separation distances (as set out in the adopted SRDG). As a consequence there is no reason at this stage to believe the proposed development would result in any unacceptable impact to existing nearby residents in terms of visual dominance, loss of natural light/overshadowing or loss of privacy. In terms of the concern of noise noted in the public representations section there will undoubtedly be a greater degree of noise than currently experienced as use of the land as paddocks however there is no reason to suggest that such will be unacceptable, particularly when considering the separation distances mentioned above. The highest likelihood for increased noise will be from car/vehicle movements but again such associated with up to 55 houses is not considered likely to be unacceptable, particularly considering the relative close proximity of the A419 at present.

61. Whilst the future reserved matters of appearance and layout will ensure overall amenity acceptability for the future residents of the development, the indicative concept plan shows the potential ability to provide adequate outdoor amenity space as well as acceptable natural light privacy levels. In summary the development is generally acceptable from a residential amenity point of view in compliance with Policy DE1 of the SBLP 2026, the adopted SRDG and the NPPF, whilst acknowledging there is likely to be some minor harm associated with additional car movements in the vicinity.

Design, Layout and Character:

62. Swindon Local Plan policy DE1 states that high standards of design will be required for all types of development. The adopted SRDG also requires high design standards as well as offered guidance on layout, context and character amongst other factors. The NPPF also details the requirement to achieve well-designed places.

63. As the application is in outline there are no dwelling elevations, floor plans or set site layout to analyse at this stage. There is no reason though to suggest that the site will not be capable of accommodating up to 55 dwellings of an appropriate design, scale and layout. The appearance, layout and scale of the development (plus landscaping) will form part of future reserved matters applications and thus are not up for consideration here. Such an application or applications would need to comply with Policy DE1 of the adopted SBLP, the SRDG and the NPPF in terms of being well designed.

64. The Blunsdon Neighbourhood Plan is accompanied by a village design statement which sets out aspirations for the village and seeks to ensure development is in harmony with its setting. The future reserved matters application relating to appearance, layout, scale and landscaping will need to pay regard to this document. It is noted in particular that the indicative layout suggests it will be possible to retain some of the boundary planting. The document details the desire to retain existing hedgerows/boundary treatments. The proposal, at this stage thus suggests compliance with this. Although the concerns of the Urban Design Officer are appreciated regarding it appearing as an 'urban scheme' it must be acknowledged that layout is not a consideration at this stage. It must also be acknowledged that the site sits in relative close proximity to Kingsdown which is an allocated urban extension.

Heritage Impact:

65. With regard to listed buildings, Section 66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 ('PLBCA') requires the decision maker to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

66. Policy EN10 of the Local Plan seeks that proposals conserve and enhance the heritage significance of Swindon's heritage assets, and reflects the statutory duties of the PLBCA. Archaeological sites should be preserved in a manner appropriate to their significance.

67. The NPPF states that the historic environment contributes to the role of sustainable development by contributing to protecting and enhancing our natural, built and historic environment. Paragraph 212 of the NPPF states *that* "When considering the impact of a proposed development on the significance of a designated heritage great weight should be given to the asset's conservation". Paragraphs 214 – 215 of the NPPF deal with levels of harm caused by development in relation to designated heritage assets with the former dealing with cases of 'substantial harm' where LPAs should refuse permission unless in case of substantial public benefits or all of a number of set criteria are met. The latter (paragraph 215) deals with cases of 'less than substantial harm' to designated heritage assets and requires that in such cases this should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

68. It is apparent that a listed building sits within close proximity to the site in the form of The Old School (grade II listed) which is located next to the south west boundary. Whilst a grade II listed milestone is recorded immediately to the north west of the site this appears to be no longer in position and according to the heritage statement there is local anecdotal evidence of this 'disappearing' some years ago. It is acknowledged that the Conservation Officer has raised concerns about the impact of the development upon the significance of the Old School (or 'Dame School') and would like to see more detail in the form of layout and scale (i.e. asking for these matters not to be reserved at this stage). However the indicative concept plan shows how the site might/could be laid out and whilst there would undoubtedly be a change to the setting of this adjacent listed building the evidence shows that it will be possible to set any built development well back from this adjacent designated heritage asset by incorporating a large area of open space, sustainable drainage and possibly an orchard and new wildlife habitats. At a potential separation distance of approximately 50 metres to the nearest built form (dwelling/garage) plus considering that this space will be green open space with the potential for appropriate planting it is considered that any harm to the setting of the adjacent listed building will fall within the lower to mid-point of 'less than substantial harm' to the significance of the heritage asset. In summary the introduction of built form in terms of up to 55 dwellings and associated works within such proximity to the grade II listed building will have some impact in that the setting will no longer be as open as at present and therefore the creation of some 'harm'. As per paragraph 215 of the NPPF where 'less than substantial harm' is found this must be

weighed against the public benefits. As noted above in this case it is considered that the 'less than substantial harm' will be at the lower to mid end. In terms of public benefits of the scheme it is apparent that it will deliver much needed housing as well as a percentage of these being affordable. In addition contributions will be secured towards public transport improvements as well as walking/cycling. It is considered that the delivery of housing and affordable housing, when considering the Borough's current 5 year housing land supply position should be given significant weight and the transport improvements modest weight. In total though it is considered that the public benefits will outweigh the less than substantial harm.

Biodiversity:

69. The NPPF encourages the incorporation of biodiversity improvements. Policy EN4: Biodiversity and Geodiversity of the adopted SBLP is also or relevance in this regard. The application is accompanied by ecological surveys that contain proposed biodiversity enhancements for the site. The Council's Ecologist is satisfied that there will be no unacceptable biodiversity related harm subject to suggested conditions and although the application is not subject to the national 10% net gain requirement (as a result of the application having been received prior to this being brought into force) Policy EN4 does require biodiversity net gain, albeit without a prescribed figure for such. In this case the submitted ecological survey proposes biodiversity enhancements and as part of the recommended Landscape, Ecology and Arboricultural Management Plan (LEAMP) condition such can be secured to ensure compliance with Policy EN10 in this regard.

Drainage:

70. Policy EN6 of the Local Plan seeks to minimise the risk and impact of flooding on the site and adjoining land. It also states that all developments must assess local flooding and drainage issues, and incorporate sustainable drainage systems (SuDS) where mitigation is required. Paragraph 181 of the NPPF states that LPA's should "ensure that flood risk is not increased elsewhere" and that "within the site, the most vulnerable development is located in areas of lowest flood risk unless, there are overriding reasons to prefer a different location".

71. The Lead Local Flood Authority (LLFA) have not raised any objections to the proposed drainage strategy, however to ensure the detailed design of the drainage strategy and mitigation is appropriately designed and implemented, planning conditions have been recommended. In principle the scheme accords with the provisions of the Local Plan Policy EN6 and the NPPF. Detailed design of the SuDS network and flood design will be submitted through condition discharges and the reserved matters.

Infrastructure Requirements/Heads of Terms and CIL:

72. Policy IN1 of the Local Plan covers infrastructure provision and requires all development to make a positive contribution to sustainable growth in Swindon Borough. In the context of economic viability all development should meet the cost of new infrastructure made necessary by the development; mitigate the impact of development on existing infrastructure; provide for the on-going maintenance of infrastructure delivered as a result of development; contribute to the delivery of strategic infrastructure to address the cumulative impacts of development and contribute to initiatives to increase the effectiveness and efficiency of infrastructure.

73. Planning obligations assist in mitigating the impact of unacceptable development to make it acceptable in planning terms. Planning obligations may only constitute a reason for granting planning permission if they meet the tests that they are necessary to make the development acceptable in planning terms. In accordance with Regulation 122 of the Community Infrastructure Levy Regulations 2010 planning obligations should meet the following three tests as follows:

- a) that it is necessary to make the development acceptable in planning terms;

- b) that it is directly related to the development; and
- c) that it is fairly and reasonably related in scale and kind to the development.

74. In accordance with the guidance within the Planning Practice Guidance and the NPPF the Council is required to consider the impact of planning obligations on the proposal. The financial viability of the individual scheme should be carefully considered and if the applicant is able to demonstrate to the satisfaction of the Local Planning Authority that the development is unviable the Council should be flexible in seeking planning obligations.

Affordable Housing:

75. Policy HA2 of the Local Plan sets out that 30% affordable housing should be provided on schemes over 15 dwellings or a proportionate contribution can be made off-site if robustly demonstrated as appropriate. The scheme will deliver a policy compliant 30% of affordable housing units equating to 17 dwellings.

Open Space:

76. Contributions are necessary under Policy EN3 of the adopted SBLP towards off-site open space, to be delivered in the parish (or ward). The Council's open space calculator has been used to calculate the below as the requirements for the development:

Contribution	Amount
Off-site Local Open Space	£53,410.05
Off-site Major Open Space	£16,647.29
Off-site Outdoor Sports Facilities	£35,870.94
TOTAL Combined	£105,928.28

The development will deliver on site children's facilities as well as open space. The provision of and future maintenance of will be secured as part of the S106 also.

Education:

77. Paragraph 100 of the NPPF states that the Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Policy CM1 of the Local Plan set the estimated needs for the provision of education within the borough. As part of the consultation stage of this application the Council's Education department have requested contributions to be made towards: primary education (£565,722) and secondary (£469,971) based on the delivery of a 55 dwelling scheme in this area. The applicant is agreeable to providing contributions towards primary and secondary education but has sought clarity on the totals and the calculation method. An update will be provided at Planning Committee. The contributions will be secured via the Section 106 agreement.

Highway Contributions:

78. As per the above the Highway Officer has assessed the proposals and has determined that the following are necessary:

- A contribution of £50,000 towards the cost of works, delivered by the Council, to improve the existing footway in Turnpike Road;
- A contribution of £15,000 towards the cost to the Council of erecting a bus shelter in Ermin Street;
- A contribution of £20,000 towards the cost of delivering LCWIP Scheme 18 (the Blunsdon to South Marston active travel corridor);
- A contribution of £80,000 towards the funding of bus service improvements between Blunsdon and central Swindon;

Highway Works:

79. The following requirements will be included as an obligation within the Section 106 agreement to secure the highways schemes (precise wording subject to change as part of S106 drafting):

Scheme A - The Kingsdown 'Phase 1' mitigation works (unless first delivered by Kingsdown):

- Reconfiguration and signalisation of the Cold Harbour junction.
- Implementation of a SCOOT signal system along the corridor between the Cold Harbour junction and the A4198 Thamesdown Drive/ Salzgitter Drive junction.

Scheme B - the Turnpike Road Mitigation Scheme':

- Scheme to widen Lady Lane between the Blunsdon bridge and the junction with the slip roads for the A419 northbound carriageway, Technical Note Appendix B - LADY LANE HIGHWAY IMPROVEMENTS.

The Owner covenants with the Council:

1. Not to commence development until the [Owners and/or developers] has entered into the Section 278 Agreement (supported by performance bond).
2. To carry out the Highways Works (defined as schemes A&B or an alternative scheme of mitigation that has first been agreed in writing by the Local Planning Authority in consultation with National Highways)) at its own expense in accordance with the Section 278 Agreement and to complete the Highways Works.
3. To complete the Highways Works prior to occupation of the 1st dwelling.

Habitat Regulation Assessment: North Meadows Special Area of Conservation (SAC):

80. The application site lies within the 'outer zone' of influence of the North Meadow and Clattinger Farm SAC. This is internationally important for its biodiversity and its population of Snake's Head Fritillary, which is a rare plant characteristic of damp low level meadows. Natural England have advised the Council that over recent years, recreational pressures from visitors to the site have increased and are now causing considerable damage to the wildlife value of the SAC. The Council is legally obliged to consider whether planning applications would affect the biodiversity of North Meadow. Based upon a detailed understanding of recreational impacts the Council has worked with adjacent local authorities and Natural England to establish defined 'zones of influence' or visitor catchments (inner zone of 0-4.2km and outer zone of 4.2-9.4km) from the SAC. All planning applications for net new residential or holiday accommodation within the 9.4km zone will be screened in and subject to a Habitats Regulations Assessment.

83. This application site is located within the outer zone of influence (4.2-9.4km) and has therefore been screened in for the purposes of the Habitats Regulations Assessment. To ensure a simple approach to progressing planning applications within the inner and outer zones of influence the Council has formally adopted the Interim North Meadow Mitigation Strategy for the period 2023-28. This strategy provides applicants with the option of ensuring that the recreational impacts to the SAC arising from their development can be effectively addressed through financial and other measures.

84. As the development lies within the SAC Outer (4.2 – 9.4km) Zone of Influence, a satisfactory legal agreement (Unilateral Undertaking) to secure a proportionate financial contribution towards delivering effective mitigation will need to be entered into between the Council and the applicant for the application to deliver the required measures necessary to mitigate any likely significant effects on the SAC. The Council have set out that a contribution of £331 per unit would need to be

secured to contribute to Strategic Access Management and Monitoring at the SAC. For this development (assuming 55 dwellings) the required total is thus £18,205.

81. It is considered that the S106 package in totality are compliant with the tests under Regulation 122 of the CIL Regulations 2010, and are imposed to mitigate the impact of the development. Taking into account all material considerations, it is recommended that the package is necessary to make the development acceptable in planning terms; is directly related to the development; and is fairly and reasonably related in scale and kind to the development. A Section 106 agreement will be required to secure the contributions and obligations set out above.

82. As per the Council's adopted procedure there is also the requirement for a 5% monitoring fee (of the value of the obligation) to be included within S106 agreement also.

CIL

83. The Council is a Community Infrastructure Levy (CIL) Charging Authority. At the point of writing this report the adopted CIL Charging Schedule is that dated 6th April 2015. The development constitutes CIL Liable development chargeable at the relevant rate within the relevant Charging Schedule in place at the time of calculation, that rate which is subject to indexation annually. The applicant/landowners will be informed of the relevance of CIL to the proposal and that the development is CIL liable.

Other:

84. With regard to the comments raised within the representations section that have not already been covered above the following is noted:

- Although comments regarding the ability of the services of the village (such as doctor's surgery, school and sewage/water infrastructure) are acknowledged there isn't sufficient evidence to suggest that the impact of an additional (up to) 55 dwellings would be severe enough to warrant resisting the application. Furthermore Thames Water have suggested conditions regarding sewage and water capacity, Education have sought contributions for schools and the proposals will generate CIL payments.
- There is no reason to suggest the development will lead to any compromise of the security of nearby properties.
- The total number of units to be delivered is an 'up to' figure and without this confirmed by the later reserved matters as well as the developable area it is difficult to calculate a precise density, however there is no reason at this stage to suggest it won't be possible to secure an appropriate density. Based on the whole site area and a delivery of the full 55 dwellings this would equate to 26 dwellings per hectare which is in accord with the adopted SRDG.
- Reference to the adjacent live application (S/OUT/19/0487) this will be judged upon its own merits and at the time of writing is still pending.

Conclusion:

85. As set out above it has been found that the proposals are in general accord with the development plan as a whole save for Policy SD2 in that the site falls outside of the settlement boundary and that this must weigh in the balance. Returning to paragraph 11(d) of the NPPF it has been determined under the Heritage section above that the application of policies in the Framework that protect areas of particular importance (in this case a designated heritage asset) do not provide a strong reason for refusing the development (criterion i)). As such it is then purely a matter of a balancing exercise in relation to paragraph 11 d) ii. as to whether any adverse impacts of the development would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole. In this regard an assessment of the impact of the

development has been undertaken above which has concluded that whilst contrary to Policy SD2 of the SBLP and that the site is not in close proximity to all necessary services, the proposal will not result in any unacceptable impacts in terms of any harm to: the landscape character area, highway conditions, residential amenity (save for minor increased noise from additional car movements)) or biodiversity.

86. The benefits of the development in terms of the social dimension of sustainable development have been identified to be the provision of much needed housing a percentage of which will be affordable. These are worthy of attributing significant weight. In addition there will be the delivery of off-site open space contributions, something that is attributed modest weight. In terms of the economic dimension the development would contribute towards economic growth during the construction phase through the creation of jobs and spending on goods and materials, albeit for a temporary period. Also, the additional population created would also assist the local economy in terms of utilising local services. These are considered to constitute modest weight. With regard to the environmental dimension, Blunsdon has some public transport links and the village includes a small range of services albeit that these are not all within close proximity to the proposal site. In addition the proposals will deliver biodiversity enhancements and areas of open space plus additional planting. Again these are considered to constitute modest weight.

87. The development would conflict with Policy SD2 of the adopted SBLP and the distance of the site from some services is acknowledged. Although these factors weigh against the proposal they are each considered to constitute modest weight. In the current circumstances and in the circumstances of this specific site, it is considered that these factors do not significantly and demonstrably outweigh the benefits of the proposal identified above. As such it is considered that the proposal is acceptable and outline planning permission should be granted.

Recommendation:

88. That the Chief Planning Officer be authorised to **GRANT** outline planning permission subject to:

- a) The completion of a S106 Deed to secure the planning obligations that are material to the decision (as set out in the Infrastructure Requirements & Heads of Terms section of this report); and
- (b) The planning conditions set out in this report with delegated authority to make non-material amendments, additions or omissions to those conditions before issuing formal consent as may be necessary.

89. In the event that the S106 Deed is not completed by 31st February 2026 the Chief Planning Officer be delegated authority to refuse planning permission, extend this timeframe or refer the application back to Planning Committee for determination.

Conditions

Time Limit for Development

1. The development hereby permitted shall be commenced either before the expiration of three years from the date of this permission or before the expiration of two years from the date of approval of the last of the reserved matters to be approved, whichever is the later.
Reason: To enable the Council to review the suitability of the development with Section 92 of the Town and Country Planning Act 1990 (as amended).

Reserved Matters

2. No development shall take place until all the reserved matters have first been submitted to and approved in writing by the Local Planning Authority. The 'reserved matters' are details of the layout, scale, appearance and landscaping of development.

Reason: To accord with Section 92 of the Town and Country Planning Act 1990 (as amended) as the application is in outline.

Timing of Reserved Matters

3. Applications for the approval of reserved matters shall be submitted to the Local Planning Authority before the expiration of three years from the date of this permission.

Reason: To enable the Council to review the suitability of the development in accordance with Section 92 of the Town and Country Planning Act 1990 (as amended).

Approved Plans

4. The development hereby permitted shall be carried out in accordance with the following approved plans/drawings:

- Site Boundary Plan (unnumbered)
- Site Location Plan (unnumbered)
- BM-M-08 B
- BM-M-06 E
- 187060-005 A

received on 2nd December 2019

Reason: To define the scope of the development hereby permitted, in accordance with Section 72 of the Town and Country Planning Act 1990 (as amended).

Landscape Scheme

5. As part of each reserved matters application, a hard and soft landscape scheme shall be submitted to and approved in writing by the Local Planning Authority showing:

- a) details of all trees, hedgerows and other planting to be retained;
- b) an appropriately scaled planting plan to include the location, numbers, size, species, soil volume calculations and positions of all new trees and shrubs;
- c) details of existing and proposed walls, fences, other boundary treatment and surface treatment of the open parts of the site;
- d) details of location, design, purpose, function, buffer zone and construction of the wet features (ponds and SuDS); and
- e) a programme of implementation.

The drawing shall include or be accompanied by a detailed specification setting out an appropriate methodology for implementing the scheme in accordance with the relevant British Standards to include BS 8545:2015, BS 4428:1989 and BS 5837:2012.

Reason: In the interests of visual amenity.

Landscape, Ecology and Arboricultural Management Plan (LEAMP)

6. As part of the submission of the first reserved matters application, a Landscape, Ecology and Arboricultural Management Plan (LEAMP) shall be submitted to the Local Planning Authority. The LEAMP shall be informed by the Statutory Biodiversity Metric and the Ecological Impact Assessment (Revision G – FPCR, December 2024) associated with the application, and shall provide an overarching management plan for the site. The LEAMP shall include the following:

- a) updated Phase 2 surveys of protected species where older than 2 years;
- b) details of biodiversity enhancement and habitat creation including:
 - i. the creation of species rich neutral grassland;
 - ii. the creation of a SuDS basin;

- iii. appropriate management and gapping up of hedgerows;
- iv. replacing felled trees with native species; and
- v. bat and bird boxes/bricks on retained trees and integrated into proposed buildings (wildlife boxes/bricks should be integrated into the design of new buildings on a 1:1 ratio with 50% bird boxes and 50% bat boxes). Integrated features (with details of make, model and locations) shall be visible in elevations plans.
- c) long term protection objectives, habitat connectivity and proposals for allowing and restricting public access;
- d) management responsibilities and maintenance schedules for all landscaped and habitat areas (except privately owned domestic gardens) as well as remediation measures if management objectives are not met.
- e) details of any proposed lighting (including luminaire type; mounting height; aiming angles and luminaire profiles) as well as an ISO lux plan showing light spill; and
- f) a timetable for implementation.

Updated Phase 2 surveys of protected species shall be provided as part of each reserved matters application where older than 2 years.

No development shall commence until the LEAMP has been approved in writing by the Local Planning Authority. Development shall be progressed in accordance with the approved LEAMP. The approved management and maintenance schedules shall be adhered to at all times.

Reason: To minimise impacts on and provide net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures in accordance with the NPPF 2024 (187) and Policy EN4 of the Swindon Borough Local Plan 2026. The LEAMP shall also ensure the development provides access to nature to promote human well-being.

Landscape Replacement

7. All landscaping shall be implemented in accordance with the approval of reserved matters of the development and accord with the approved timetable of works. Any planting carried out in accordance with these approved details that within a period of 5 years from the date planted, dies, is removed or becomes seriously damaged or diseased, shall be replaced in the next planting season with other(s) of the same size and species.

Reason: To safeguard all features of landscape interest in the interests of the visual amenity.

Tree Protection - Measures

8. No development shall commence on site unless and until:

details of all temporary protective fences to safeguard the trees, hedges or other vegetation to be retained on the site have first been submitted to and approved in writing by the Local Planning Authority; and the approved protective fencing had first been erected in accordance with BS 5837:2012 and the approved details shall thereafter be maintained in accordance with BS 5837:2012 “Trees in relation to design, demolition and construction – Recommendations” throughout the development or until the Local Planning Authority has confirmed in writing that the fencing can be removed.

Reason: To ensure that appropriate protection is provided for the trees and hedges on the site to be retained.

Tree Protection - Fencing

9. Notwithstanding the provisions of Part 2 of Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any order revoking and re-enacting that Order with or without modification) no fence or other means of enclosure shall

be erected within the root protection area or closer to any existing hedgerow or tree, other than as shown on the approved landscaping plans for the reserved matters approved pursuant to this outline planning permission.

Reason: To safeguard all features of landscape interest in the interests of biodiversity.

Construction and Environmental Management Plan (CEMP)

10. Prior to the commencement of development, including any works of demolition, site clearance, site preparation and site mobilisation, a Construction and Environmental Management Plan (CEMP) shall be submitted to and approved in writing by the Local Planning Authority. Once agreed, such mitigation measures shall be implemented in accordance with the approved details prior to the commencement of any construction works. The approved CEMP shall be adhered to throughout the construction period. The CEMP shall:
 - a) specify the type and number of vehicles that will access the site during the construction period, contact details for site manager and secure vehicle logs, including registrations and time of arrival/departure;
 - b) specify the point of construction access and access route to the site;
 - c) set out details of the parking of vehicles of site operatives and visitors;
 - d) set out arrangements for the loading and unloading of plant and materials;
 - e) set out arrangements for the storage of plant and materials used in constructing the development;
 - f) details of buildings, enclosures and staff facilities;
 - g) details of a procedure for wheel washing and vehicle wash down of all site construction traffic leaving any of the construction sites;
 - h) include measures to control the emission of dust, smoke, fumes and debris;
 - i) provide a method statement for the control of noise and vibrations, including pile driving and assess the need for any acoustic hoarding;
 - j) provide mitigation for habitats and protected species to include consideration of the measures outlined in the Ecological Impact Assessment (Revision G – FPCR, December 2024) associated with the planning application);
 - k) provide details of measures for the treatment and protection of any environmentally sensitive areas of:
 - i. a site walkover survey by a suitably experienced/qualified Ecological Clerk of Works to ensure that the status of the Site for habitats and species has not significantly altered since planning consent;
 - ii. the measures to be used during the construction works in order to minimise and reduce the environmental impact of the works (considering both potential disturbance and pollution); and
 - iii. a map or plan showing habitat areas to be specifically protected (identified in the ecological report) during the works;
 - iv. Measures to avoid impacts to individual reptiles;
 - v. Measures to avoid impacts to nesting birds;
 - vi. Measures to avoid indirect impacts to foraging and commuting bats with adherence to a sensitive lighting scheme;
 - vii. Measures to avoid impacts to individual badgers;
 - viii. Details of the responsibilities of the Ecological Clerk of Works and during which phases of construction they will be required.
 - l) a scheme for recycling/disposing of waste resulting from construction works;
 - m) proposals for the transport of waste during the development process;
 - n) details of any pollution, hazardous materials and contamination protection methods; and

- o) details of the persons/ bodies responsible for particular activities to be controlled by the CEMP including to demonstrate suitably qualified for the activity they are undertaking or supervising (e.g. Ecological Clerk of Works).

Reason: To reduce the potential impact on the public highway and ensure the protection of the environment during the site preparation and construction phase(s) of development in accordance with Policy TR2, DE1 and EN7 of Swindon Borough Local Plan 2026.

Lighting

11. Prior to the commencement of development above slab level, a lighting plan which has been designed to minimise impacts on biodiversity shall be submitted to and approved in writing by the local planning authority. Details of any proposed external lighting shall accord with the Bat Conservation Trust/Institute of Lighting Professionals 'Guidance Note 08/23: Bats and Artificial Lighting at Night' and include a layout plan with beam orientation and a schedule of light equipment proposed (luminaire type; mounting height; aiming angles and luminaire profiles) as well as an ISO lux plan showing light spill. It will be clearly demonstrated that areas to be lit will not impact areas identified as being of value to foraging/commuting bats in the Ecological Impact Assessment (Revision G) (FPCR, December 2024). All external lighting shall be installed in accordance with the specifications and locations set out in the plan and be maintained thereafter.

Reason: To limit the impact of light pollution from artificial light in accordance with the NPPF 2024.

Construction Hours

12. No work, site preparation or works required for site mobilisation, including the waiting of vehicles undertaking deliveries and collections during the construction phases shall take place outside the following hours:
0730 to 1800 Monday to Friday;
0800 to 1300 Saturdays; and
Not at all on Sundays, Bank Holidays and Public Holidays.
Deliveries or collections associated with construction phases shall use reasonable endeavours to avoid entering or leaving the site between peak hours of 0800 and 0900 or 1700-1800 on weekdays (Monday – Friday, excluding public holidays).

Reason: To protect residential amenity and highway safety.

Site Access

13. Prior to the occupation of the development hereby permitted, the vehicular access shall be laid out and constructed in accordance with the submitted plan [drawing no. 187060-005 A] and shall be maintained thereafter.

Reason: To reduce potential highway impact by ensuring the access is suitably laid out and constructed.

Access Road

14. The development shall be served by an access road laid out and constructed in accordance with the approved reserved matters details and no dwelling on the development shall be occupied until the road (including vehicular turning head(s), street lighting, drainage and footways where proposed) providing access from the nearest public road to that dwelling has been completed to at least binder course and footways to surface course level in accordance with the details so approved.

Reason: To ensure a satisfactory means of access for occupants of the development.

Parking Standards

15. The reserved matters application of layout shall demonstrate car parking provision (including garages), cycle and motorcycle parking for that use in accordance with the Council's adopted car parking standards, together with associated manoeuvring and turning space. The parking spaces (including garages) shall be constructed, laid out and made available for use prior to the first occupation of each unit and shall be retained and maintained thereafter for the parking of private motor vehicles.

Reason: To ensure vehicle parking provision is made in accordance with the Council's adopted standards and is available for use for that purpose in the interests of highway safety and residential amenity.

Use of garages and car parking spaces

16. In order to count towards the required parking provision, the minimum internal dimensions of individual parking spaces and residential garages to be constructed in connection with the development hereby permitted shall be in accordance with the Council's adopted standards, without any internal obstructions. All garages shall thereafter be made available for use at all times for parking a car.

Reason: To ensure satisfactory provision for vehicles in the interests of highway safety and residential amenity.

Surface Water Drainage Scheme

17. Development shall not begin until a surface water drainage scheme for the site, in accordance with the approved drainage strategy 'Flood Risk Statement & Drainage Strategy – Turnpike Road, Blunsdon Issue B, November 2019', has been submitted to and approved in writing by the Local Planning Authority. The scheme shall subsequently be implemented in accordance with the approved details before the development is completed. The scheme shall include:

- a) evidence that the proposed flows from the site will discharge at or below greenfield runoff rates, or as close as practical for any areas that have been previously developed;
- b) details of how the drainage scheme has incorporated SuDS techniques to manage water quantity and maintain water quality;
- c) detailed drainage plan showing the location of the proposed SuDS and drainage network with exceedance flow routes clearly identified;
- d) details to demonstrate the SuDS Scheme has been designed in accordance with best practice guidance including the latest SuDS Manual C753;
- e) general arrangement, which should be coordinated with the landscape proposals and the masterplan;
- f) manhole schedules;
- g) detailed drainage calculations for all rainfall events up to and including the 1 in 100 year plus climate change to demonstrate that all SuDS features and the drainage network can cater for the critical storm event for its lifetime;
- h) any drainage systems offered for adoption will be designed to Sewers for Adoption 7th edition and/or SBC standards as part of the detailed design and relevant technical approval processes.

Reason: To ensure development does not increase the risk of flooding elsewhere in accordance Policy EN6 of the Swindon Borough Local Plan.

Surface Water Maintenance

18. Development shall not be occupied until a surface water drainage maintenance scheme for the site, in accordance with the approved maintenance regime 'Flood Risk Statement & Drainage Strategy – Turnpike Road, Blunsdon Issue B, November 2019', has been submitted

to and approved in writing by the Local Planning Authority. The scheme shall subsequently be maintained in accordance with the approved details.

Reason: To ensure development does not increase the risk of flooding elsewhere in accordance Policy EN6 of the Swindon Borough Local Plan.

Wheelchair Accessible Housing

19. Not less than two dwellings shall be provided as wheelchair user homes and, as a minimum, meet the standards specified within Part M4 (3) Category 3 of the Building Regulations 2010 (2015 edition). Wheelchair user dwellings provided for sale as open market dwellings should, as a minimum, meet the standards for wheelchair adaptable homes specified within Part M4 (3) (2a) of the Building Regulations 2010 whereby the building will allow simple adaptation of the dwelling to meet the needs of occupants to use wheelchairs.

Homes shall provide ramped access with flush thresholds into all doorways, doorway widths and use of a bathroom, toilet and kitchen at entry level as well as sufficient space to enable internal circulation, through-the-floor lift vertical circulation and for kitchens and bathrooms to be fully adapted in the future for use by wheelchair user occupiers in accordance with a plan or schedule, which shall have first been submitted to and approved in writing by the Local Planning Authority.

For wheelchair user homes provided as social or local authority housing, the dwellings should, as a minimum, meet the standards for wheelchair accessible homes specified within Part M4 (3) (2b) of the Building Regulations 2010 whereby the building will meet the needs of occupants who use wheelchairs from the point of completion. Homes shall provide ramped access with flush thresholds into all doorways, doorway widths, space for internal circulation, a fitted through-the-floor lift and a fully adapted bathroom, toilet and kitchen (all at entry level), in accordance with a plan or schedule, which shall have first been submitted to and approved in writing by the Local Planning Authority.

These design features and provisions shall be retained for so long as the buildings hereby permitted remain in use as dwellinghouses. The wheelchair user homes shall be provided before occupation of 90% of dwellings on the site.

Reason: for reasons of inclusivity and accessibility in accord with policies DE1, HA3 of the Swindon Local Plan.

Slab Levels

20. As part of each reserved matters application, details shall be submitted of the proposed slab levels of the building(s) in relation to the existing and proposed levels of the site and the surrounding land. The development hereby approved shall be constructed in accordance with the approved details.

Reason: To ensure the details and appearance of the development is acceptable and is considerate of the relationship between existing and proposed dwellings.

Materials

21. Prior to the commencement of development above slab level, details of all external facing materials (including sample panels) shall have first been submitted to and approved in writing by the Local Planning Authority. The development hereby permitted shall be carried out and retained thereafter in accordance with these approved details.

Reason: To ensure that the appearance of the development is satisfactory.

Contaminated Land

22. No development shall take place until a site investigation of the nature and extent of

contamination has been carried out in accordance with a methodology which has previously been submitted to and approved in writing by the local planning authority. The results of the site investigation shall be made available to the local planning authority before any development begins. If any significant contamination is found during the site investigation, a report specifying the measures to be taken to remediate the site to render it suitable for the development hereby permitted shall be submitted to and approved in writing by the local planning authority before any development begins.

The Remediation Scheme, as agreed in writing by the Local Planning Authority, shall be fully implemented in accordance with the approved timetable of works and before the development hereby permitted is first occupied. Any variation to the scheme shall be agreed in writing with the Local Planning Authority in advance of works being undertaken. On completion of the works the developer shall submit to the Local Planning Authority written confirmation that all works were completed in accordance with the agreed details.

Reason: To ensure any contamination of the site is identified and appropriately remediated.

23. If, during the course of development, any contamination is found which has not been identified in the site investigation, additional measures for the remediation of this contamination shall be submitted to and approved in writing by the local planning authority. The remediation of the site shall incorporate the approved additional measures.

Reason: To ensure any contamination of the site is identified and appropriately remediated.

Noise

24. The proposed residential units shall be designed to meet the indoor ambient noise levels contained in British Standard 8233:2014 (or later versions) which currently require:

- Resting 35 dB LAeq,16hour
- Dining 40 dB LAeq,16hour
- Sleeping 30 dB LAeq,8hour
- 45dB LAFmax
- 50 dB LAeq, 16hour in external amenity spaces

Reason: In the interests of residential amenity.

25. Where the specified internal noise levels in bedrooms and living rooms can only be achieved by closing windows, supply air mechanical ventilation (MVHR) or alternative mitigation shall be provided to the room to a standard of ventilation to be agreed in writing by the Local Planning Authority. All supply air ventilation systems shall be supplied with heat recovery to reduce energy loss in winter and shall be supplied with a heat recovery by-pass in summer. All supply air ventilation systems shall have a standard and boost facility. All the controls on mechanical ventilation systems shall be easily and practically accessible by the occupants of the dwelling.

Reason: In the interests of residential amenity.

26. Prior to occupation of the residential units, a pre-occupation validation noise survey shall be conducted in order to demonstrate that the noise mitigation measures detailed are effectual in reducing external noise to an acceptable level and a certificate of compliance by an approved acoustic assessor should be submitted to the Local Planning Authority to demonstrate that the standards required under BS 8233:2014 have been achieved. The survey shall demonstrate compliance with the following criteria:

- Resting 35 dB LAeq,16hour
- Dining 40 dB LAeq,16hour

- Sleeping 30 dB LAeq,8hour
- 45dB LAFmax
- 50 dB LAeq,16hour in external amenity spaces

Reason: In the interests of residential amenity.

Thames Water

27. No properties shall be occupied until confirmation has been provided that either:- 1. All wastewater network upgrades required to accommodate the additional flows from the development have been completed; or- 2. A housing and infrastructure phasing plan has been agreed with Thames Water to allow additional properties to be occupied. Where a housing and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan.

Reason: Network reinforcement works are likely to be required to accommodate the proposed development.

Thames Water 2

28. No properties shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional flows to serve the development have been completed; or - a housing and infrastructure phasing plan has been agreed with Thames Water to allow additional properties to be occupied. Where a housing and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan.

Reason - The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development.

Thames Water 3

29. No construction shall take place within 5m of the water main. Information detailing how the developer intends to divert the asset / align the development, so as to prevent the potential for damage to subsurface potable water infrastructure, must be submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any construction must be undertaken in accordance with the terms of the approved information. Unrestricted access must be available at all times for the maintenance and repair of the asset during and after the construction works.

Reason: The proposed works will be in close proximity to underground strategic water main, utility infrastructure.

Thames Water 4

30. No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure.

Informatics

1. To advise of the s.106 obligation relating to off-site highway works.

2. To advise of the s.106 obligation relating to footway works.

3. CIL Liable Development

This development constitutes Community Infrastructure Levy (CIL) liable development. CIL is a mandatory financial charge on development. For more information on CIL visit www.swindon.gov.uk/cil and <https://www.gov.uk/guidance/community-infrastructure-levy> and <https://www.planningportal.co.uk/planning/policy-and-legislation/CIL/about-CIL>. To avoid additional financial penalties the requirements of the impact of CIL and correct process must be managed before development is commenced and subsequently where relevant payment made in accordance with the requirements of the CIL Demand Notice(s) issued. Information on possible exemptions that may be capable of being applied for and all the forms can be found at these links

4. Street Naming and Numbering

In addition to this consent, under the Town Improvement Clauses Act 1847 the applicant is required to contact SBC's Street Naming & Numbering Officer as soon as possible with regard to registering new or changes to the official address of any properties within this development.

5. Works in Highway

In addition to this consent, the proposed development will require separate Local Highway Authority approval for the construction of works in the highway. The Applicant is required to obtain this approval before works commence and is therefore recommended to contact Swindon Borough Council's Street Works Management Department in this respect as soon as possible.

6. Great Crested Newts

The applicant is advised that Great Crested Newts are protected by the Wildlife and Countryside Act (1981) and have European Protection under the Conservation Regulations (1994). The European protection afforded to this species means that a licence may be required from the Department of Environment, Transport and the Regions for the works you propose. Natural England can be contacted at <https://www.gov.uk/government/organisations/natural-england>.

7. Badgers

The applicant is made aware that under the protection of Badgers Act (1992), it is illegal to kill, injure, take or cruelly ill-treat a badger, or damage, destroy or obstruct access to a badger sett, or disturb a badger whilst it is occupying a sett. If any construction work using heavy machinery is required to be completed within 30 metres of the sett, lighter machinery within 20 metres or hand tools within 10 metres, a licence will be required from Natural England. Natural England can be contacted on wildlife@naturalengland.gov.uk.

8. Electric Vehicle Charging Points (EVCPs)

Prior to the development being brought into use, the buildings are required to provide EVCPs in accordance with Building Regs Document S: Infrastructure for the charging of Electric Vehicles.



Appendix B – Design and Access Statement



TURNPIKE ROAD
BLUNSDON

Barton Willmore



[REDACTED]

\\srvslvfiles1\Files\30000 - 30999\30200 - 30299\30270
- Turnpike Road, Blunsdon\A5 - Reports & Graphics\Graphic
Design\Documents\Das\30270 Blunsdon DAS 08

Date: 07.11.19 / Status: FINAL / Rev: 09

Author: DW | Checked by: LH

EXECUTIVE SUMMARY.....	4
1. INTRODUCTION.....	5
2. PLANNING POLICY CONTEXT.....	8
3. SITE CONTEXT, OPPORTUNITIES & CONSTRAINTS.....	12
4. DESIGN PRINCIPLES.....	34
5. DELIVERY.....	42

EXECUTIVE SUMMARY

This Design and Access Statement (DAS) has been prepared on behalf of Bellway Homes Ltd to support an outline planning application for development of up to 55 dwellings (Use Class C3) at Turnpike Road, Blunsdon. All matters are reserved, except for access.

The Statement sets out the planning context and constraints and opportunities affecting the site, and also presents an illustrative concept plan to show how the proposal could be successfully accommodated.

The Statement also explores the guiding design principles for development and how the proposal can improve walking and cycling links from the site to nearby facilities and Blunsdon local centre.

1. INTRODUCTION

1.1. SCOPE OF THE DAS

This DAS has been structured as follows:

- » Section 1: Sets out the scope of the DAS and introduces the site and proposed development
- » Section 2: Provides an overview of the site context including the planning policy context. This is summarised in an opportunities and constraints plan.
- » Section 3: Illustrates how the site could be developed through the inclusion of a Concept Masterplan. This section also provides an indication of the scale of development, landscape and access.
- » Section 4: Provides an overview of Bellway Homes and a summary of the development benefits.

1.2. SITE LOCATION

The application site (hereafter referred to as 'the site') is located to the north of Turnpike Road, south of the village of Blunsdon.

Beyond Turnpike Road to the south is the Blunsdon Bypass (A419), to the south east is Kingsdown Lane, which accommodates sporadic commercial and residential ribbon development, and to the north-west and north is open farmland, beyond which is the village of Blunsdon.

Blunsdon village is located to the north of Swindon. The nearest rail station is Swindon Station, which is 2.9 miles away.



Wider Location Plan

1.3. THE SITE

The site comprises approximately 2.05 hectares (ha) (5.06 acres) of farmland. It is well defined and screened to all boundaries by tree lined hedgerows.

1.4. APPLICATION DESCRIPTION

This DAS accompanies an outline planning application made on behalf of Bellway Homes Ltd for:

Outline application for the erection of up to 55 dwellings (Use Class C3), provision of public open space, sustainable drainage, detailed access arrangements, demolition of the existing outbuildings and ancillary works.

1.5. THE PROPOSED DEVELOPMENT

The proposed development is designed to accord with National and Local Planning policies.

A co-ordinated and iterative approach to design, planning and technical input has been adopted throughout the design process. This has enabled a responsive, positive and sustainable design proposal to be developed for the site.

A wide range of benefits that reach beyond the site boundary will be delivered by the proposed development to include:

- » Up to **55 dwellings** in a mix of size and tenure addressing part of the five-year housing supply requirement alongside market demands
- » Provision of up to **30% affordable dwellings** on site, in line with local plan policy and discussions with the Council's Officers
- » **Public open space** providing facilities to both new and existing residents including Local Area of Play



Site Boundary Plan

2. PLANNING POLICY CONTEXT

2.1. NATIONAL POLICY

This section of the DAS provides a summary of the analysis that has been undertaken for the site including:

- » Relevant planning policies (that have informed the design concepts, principles and access)
- » Local Facilities and Movement
- » Opportunities and Constraints

Swindon Borough Council (SBC) have confirmed via pre-application advice that 2019 NPPF's the presumption in favour of sustainable development currently applies given the lack of a deliverable 5-year housing land supply.

Paragraph 11(d) of the NPPF advises on decision-taking in such circumstances, whereby permission should be granted unless

"i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed6; or

ii. any adverse impacts of doing so would be significant and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."

The Planning Statement accompanying this DAS explains that there are no NPPF policies which provide a clear reason for refusing the development proposed (NPPF11d (i)). Whilst the proposals would cause less than substantial harm to the setting of a Grade II listed building (afforded statutory protection under s66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, NPPF196 requires that this less than substantial harm (lower end of the spectrum) should be weighed against the public benefits of the proposal.

The public benefits of providing market and affordable homes in a sustainable location on the edge of Swindon to be delivered by a 5* housebuilder - in circumstances where SBC has a significant shortfall in housing land supply - outweigh this less than substantial harm. The presumption in favour of sustainable development is therefore still engaged under the provisions of NPPF196. In addition, there are no adverse impacts which significantly and demonstrably outweigh the benefits associated with this scheme (NPPF11d (ii)).

The Planning Statement provides further details, also explaining how the proposals align with the wider suite of NPPF policies from promoting sustainable transport (section 9), making effective use of land (section 11), achieving well-designed places (section 12), meeting the challenge of climate changing and flooding (section 14) to the conservation and enhancement of the natural and historic environment (section 15 & 16).

2.2. LOCAL POLICY

Planning law requires that applications are determined in accordance with the development plan, unless material considerations indicate otherwise. The development plan relevant to determination of this application is the Swindon Borough Local Plan 2026 (Adopted March 2015) (SBLP).

Although the proposals conflict with the spatial strategy set out in Policy SD2 of the SBLP (exceeding the scale of development envisaged for Blunsdon and going beyond existing settlement boundaries), this policy is out-of-date. The policy states that the strategy was to be reviewed by 2016 at the latest, a review which did not take place.

Furthermore, the 2019 NPPF is a clear material consideration, limiting the weight to be afforded to this policy given the lack of a 5-year housing land supply in the borough as a whole (NPPF11d). The presumption in favour of sustainable development therefore applies, as confirmed in pre-application advice received from SBC. The implications of the presumption in favour of sustainable development are outlined in section 2.1 and explored in more detail as part of the Planning Statement.

It is also important to note that the adopted SBLP allows for development to come forward in circumstances where adopted policies are out-of-date. Policy SD3 essentially sets out a presumption

in favour of sustainable development similar to that included in the NPPF, whereby the Council will grant permission unless material considerations indicate otherwise, taking into account whether any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits when assessed against the policies of the NPPF taken as a whole, or specific policies indicate that development should be restricted. The proposals align with the requirements of Policy SD3.

More widely, the proposals accord with the suite of development management policies in the SBLP, including DE1: High Quality Design, HA1: Mix, Type & Density, HA2: Affordable Housing, TR2: Transport and Development, IN1: Infrastructure Provision, IN2: Water Supply and Wastewater, CM2: Active, Healthy and Safe Lifestyles, EN1: Green Infrastructure, EN3: Open Space, EN4: Biodiversity, EN5: Landscape Character and Historical Landscape, EN6: Flood Risk, EN7: Pollution, EN9: Contaminated Land, EN10: Historic Environment & Heritage Assets.

The emerging Blunsdon East Neighbourhood Plan (BENP) has little weight at the present time as confirmed in pre-application received from SBLP.

The Planning Statement should be referred to for further details on these policy related matters.

2.3. DESIGN GUIDANCE

The proposed development has been informed by design guidance from national and local bodies including the:

- National Design Guide, MHCLG, 2019
- Swindon Residential Design Guide, SBC, 2016

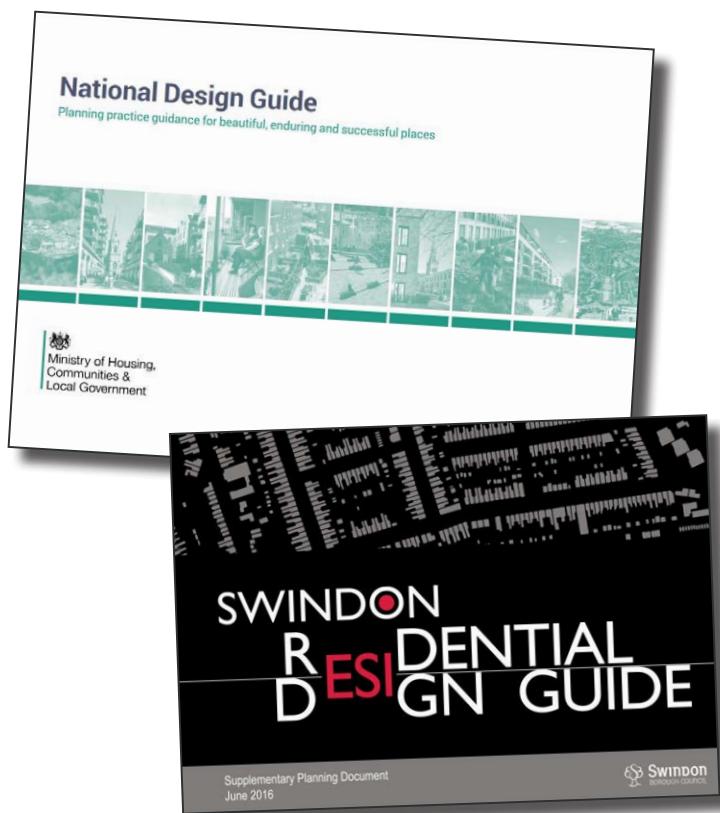
Key considerations taken from these documents at this stage include the formation and density of built form, scale and massing, street layout and hierarchy and connectivity.

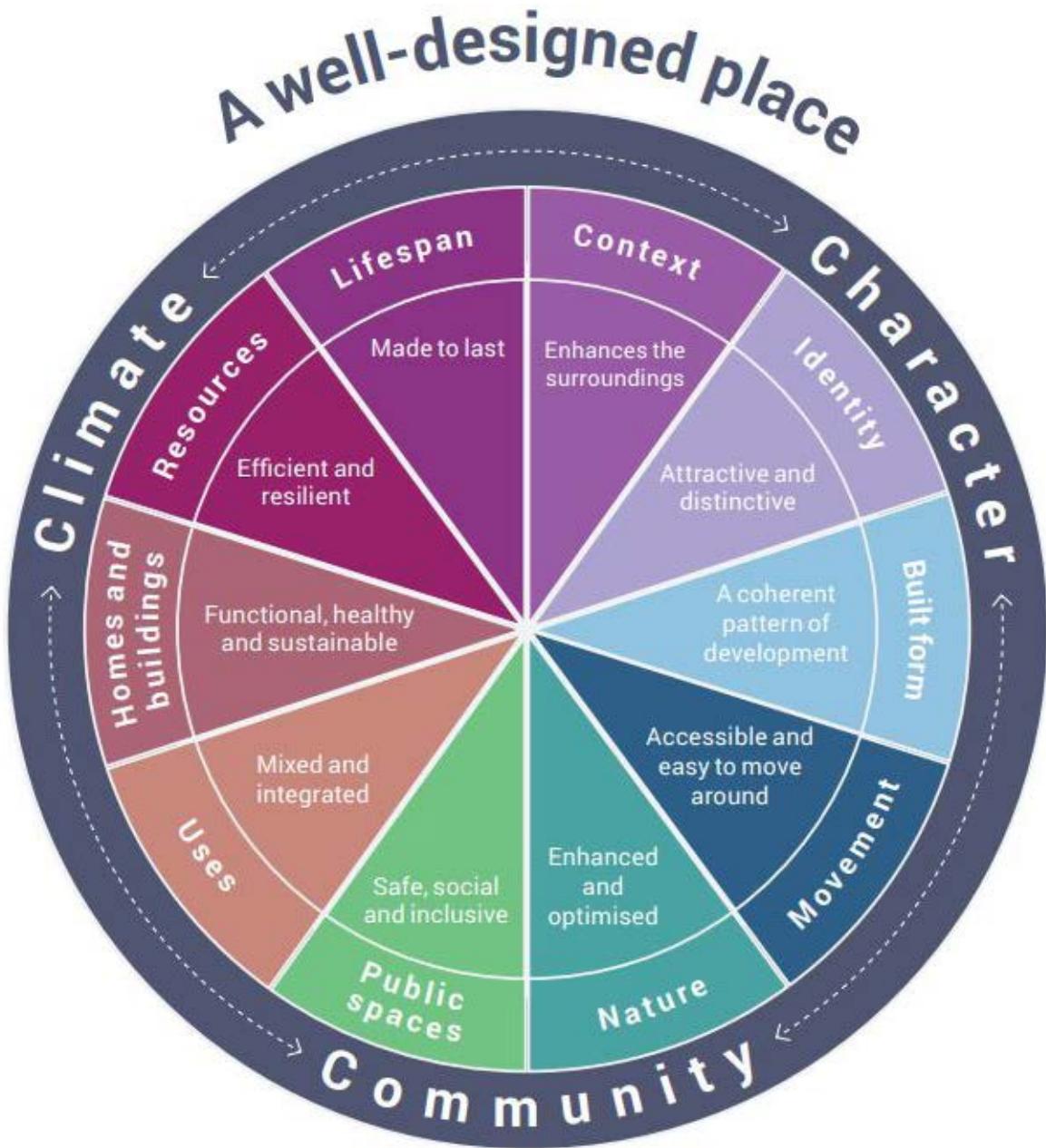
Some key sections taken from the Swindon Residential Design Guide which have informed this proposal include:

- Accessibility '3.8. The development form of schemes must positively address and respond to the entrance. This will ensure the principles of legibility, safety and security are also enhanced and enable the site's character to be established. Poorly conceived points of access that result in compromised layouts and blocks will not be acceptable.'
- Legibility '3.20. Movement routes through a development connect and integrate places, and the way routes are laid out across a site defines the structure of that place. A clear logical structure is fundamental to legibility. This should be achieved through well-ordered, defined streets and strong relationships between uses, buildings, routes and spaces.'

Some key sections taken from the National Design Guide which have informed this proposal include:

- Context. '41. Well-designed development proposals are shaped by an understanding of the context that identifies opportunities for design as well as constraints upon it. This is proportionate to the nature, size and sensitivity of the site and proposal.'
- Built form. '66. Well-designed places also use the right mix of building types, forms and scale of buildings and public spaces to create a coherent form of development that people enjoy. They also adopt strategies for parking and amenity that support the overall quality of the place.'





- **Context** – enhances the surroundings.
- **Identity** – attractive and distinctive.
- **Built form** – a coherent pattern of development.
- **Movement** – accessible and easy to move around.
- **Nature** – enhanced and optimised.
- **Public spaces** – safe, social and inclusive.
- **Uses** – mixed and integrated.
- **Homes and buildings** – functional, healthy and sustainable.
- **Resources** – efficient and resilient.
- **Lifespan** – made to last.

The ten characteristics of well-designed places (National Design Guide, 2019)

3. OPPORTUNITIES AND CONSTRAINTS

3.1. SUMMARY OF OPPORTUNITIES & CONSTRAINTS

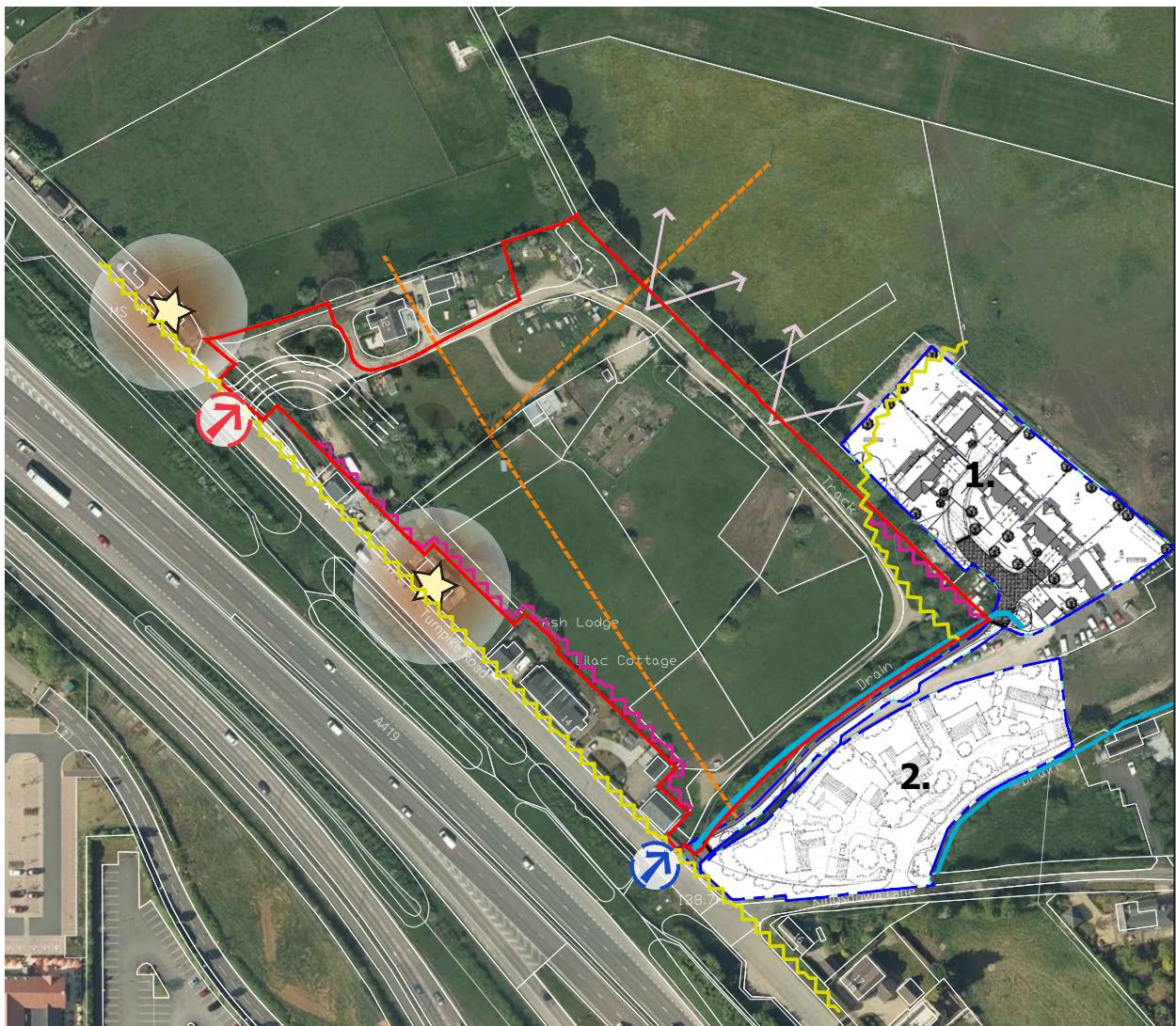
OPPORTUNITIES

- » 18-20 minute walk to local centre and primary school
- » 7 minute walk to public house
- » 11 minute walk to Swindon Stadium
- » Site is in within Flood Zone 1 presenting negligible flood risk.
- » Utilise the existing site topography to inform the location of blue infrastructure and SuDS.
- » Utilise existing access point for primary access.
- » Utilise existing access point to the south of the site for additional pedestrian and cycle access.
- » Opportunity to retain / relocate existing orchard planting
- » Opportunity to meet identified local market and affordable housing needs on a sustainable site adjoining Swindon (jobs, facilities, retail and leisure) and close to Blunsdon.
- » Potential to complement development planned at Kingsdown which will further enhance the sustainability of this location, including a new local centre, primary school and shops, near to the site alongside improvements to pedestrian and cycle infrastructure along Turnpike Road, as well as investment in public transport.
- » Delivering an attractive setting to the Old School Grade II Listed Building as a green ‘focal point’ to the scheme.
- » Providing a new Local Area for Play (LAP) for pre-school children in the area.

- » The site is well screened from public vantage points, with opportunities for further enhancement of existing boundaries.
- » Delivering new homes on a sequentially preferable site at lowest risk of flooding, with opportunities to include sustainable drainage as part of an extensive green infrastructure network, including ecological habitats
- » Enhancing the ecological value of the site through further planting (including native species), bat boxes and bird boxes

CONSTRAINTS

- » Minimising the impact on the setting of the The Old School, a Grade II Listed Building sited adjacent to the southern boundary as far as possible.
- » Diversion of existing overhead powerlines.
- » Existing property, to be replaced
- » Noise from the A419
- » Retention of existing trees and hedgerows as far as possible, including provision of replacement orchard planting if existing trees need to be removed.
- » Need for off-site reinforcement of water supply and foul drainage networks.



Opportunities & Constraints

— Site boundary

→ Filtered views out

- Existing development
- Potential primary vehicular access point
- Potential pedestrian / cycle access
- Setting consideration: amenity and privacy of adjacent development
- Setting consideration: noise
- Existing tree and hedgerow planting
- Existing watercourse / waterbody
- Listed buildings
- Consideration of Listed buildings and setting
- Existing overhead power lines

1. Lindsey's Yard. Application Ref: S/OUT/18/2007 (Planning permission granted on 22nd March 2018)

2. Application Ref: S/OUT/18/0942 which was submitted in June 2018. This hasn't been determined yet. Outline application for 5 dwellings following demolition of existing equestrian buildings and dwellings

3.2. TECHNICAL ASSESSMENTS

The opportunities and constraints set out in this section have been informed by a suite of technical assessments and surveys which include:

- Transport Assessment and Travel Plan
- Landscape and Visual Assessment
- Arboricultural Impact Assessment
- Noise Assessment
- Air Quality Assessment
- Flood Risk Assessment and Drainage Strategy
- Utilities Assessment
- Land Quality Assessment
- Ecology Appraisal
- Heritage Assessment (including geophysical survey)
- Topographical Survey

These surveys should be referred to alongside this DAS.

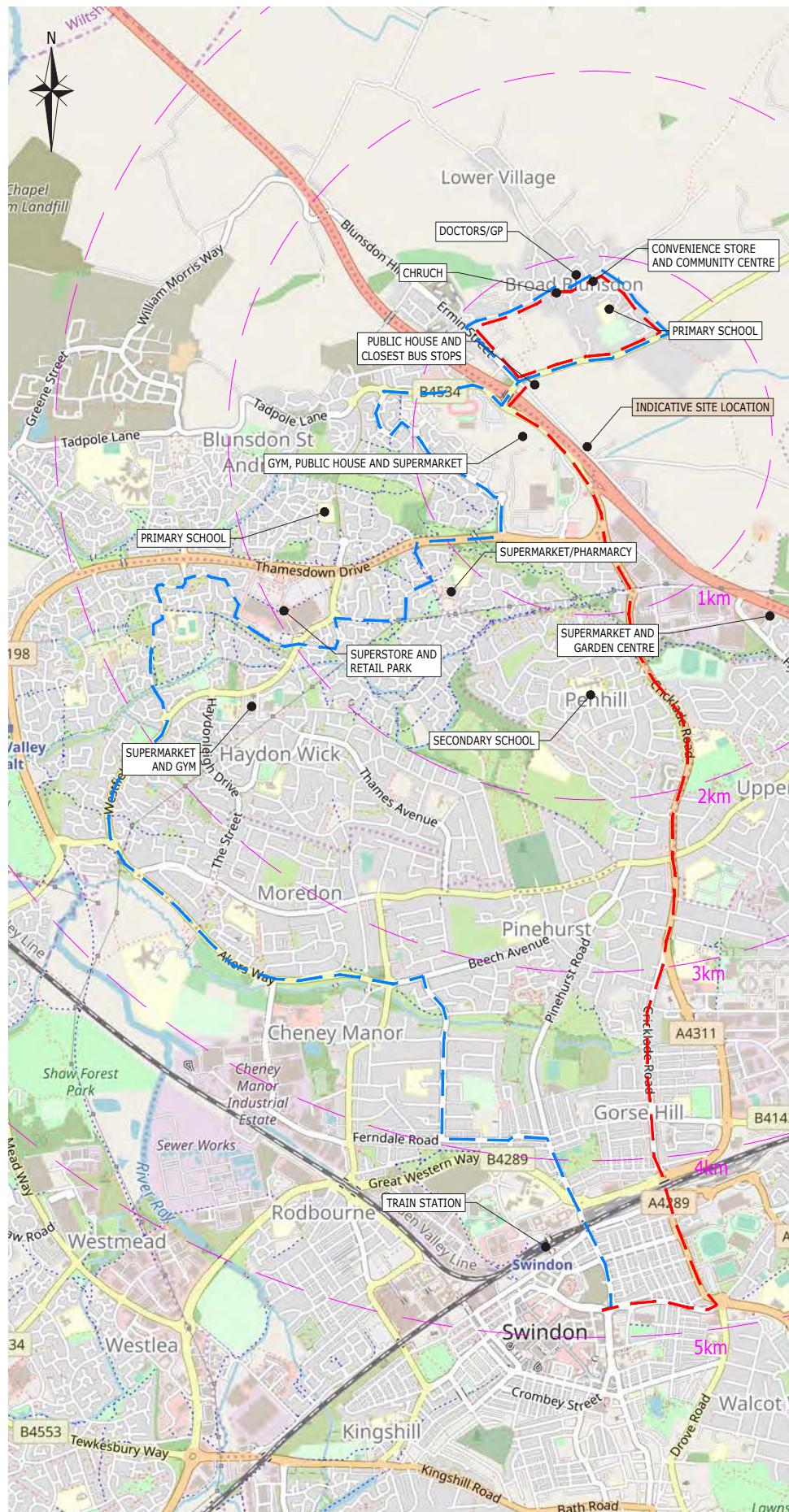
3.3. SUSTAINABILITY AND ACCESSIBILITY

Adjoining Swindon the site is a sustainable location for development, benefiting from the jobs, services and facilities on offer in the town as well as those facilities in Blunsdon. Existing public transport – including bus services 16 & 24 – is within a 500m walking distance of the site.

Blunsdon's sustainability as a location and proximity to Swindon is why the Council have allocated strategic growth to this location as part of the adopted development plan (Kingsdown allocation, SBLP Policy NC5). Development at Kingsdown will further enhance the sustainability of this location, providing new community facilities (including local centre and 2 form entry primary school) alongside investment in public transport and improvements to pedestrian and cycle connectivity along Turnpike Road. Further transport investment includes a new bridge across the A419, which has secured £6.5M of Housing Infrastructure Fund (HIF) funding. The Pedestrian Links Plan shows how the site can tie into the pedestrian and cycle improvements proposed at Kingsdown.

Safe access can be achieved on to Turnpike Road by reconfiguring the access which already serves the existing dwelling.

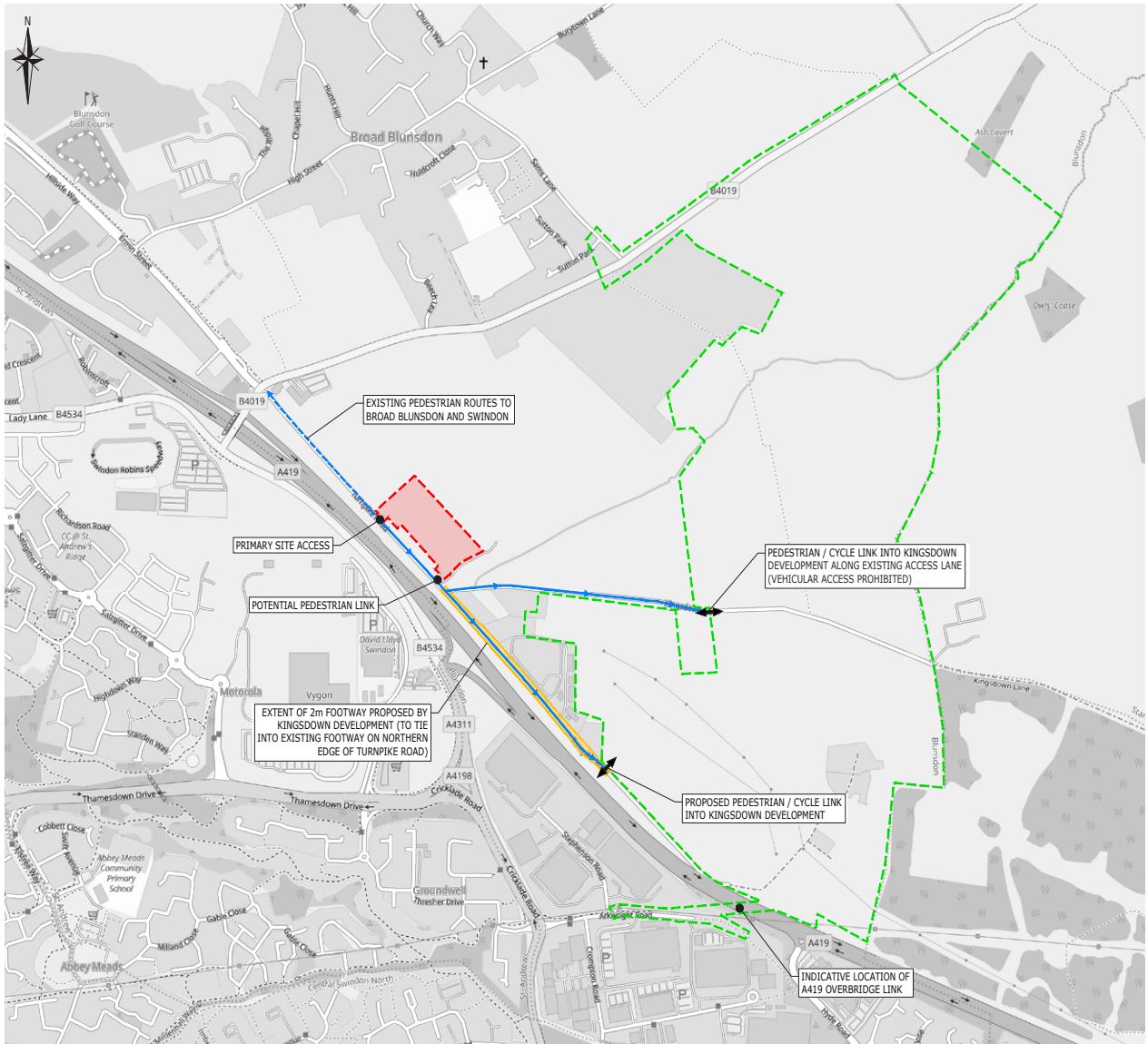
Further details are provided in the Access and Movement section and in the Transport Assessment accompanying this planning application.



Local Facilities and Accessibility Plan

KEY

— BUS ROUTE 16
— BUS ROUTE 24



Kingsdown Pedestrian Links Plan

KEY

- INDICATIVE TURNPIKE ROAD SITE BOUNDARY** (Red dashed line)
- INDICATIVE KINGSDOWN SITE BOUNDARY** (Green dashed line)
- INDICATIVE KINGSDOWN PEDESTRIAN / CYCLE ACCESS POINTS** (Black double-headed arrow)
- PEDESTRIAN ROUTES (KINGSDOWN)** (Solid blue line)
- PEDESTRIAN ROUTES (BLUNSDON)** (Dashed blue line)
- KINGSDOWN FOOTWAY IMPROVEMENT** (Orange square)

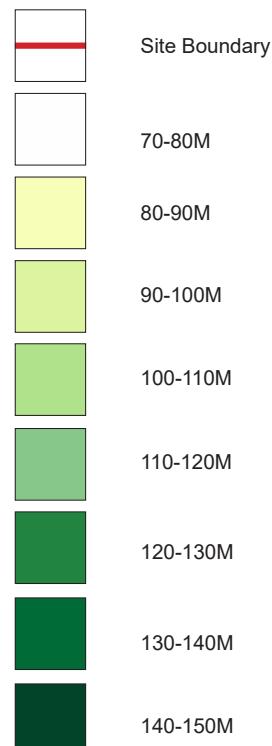
3.4. LANDSCAPE AND VISUAL CONTEXT

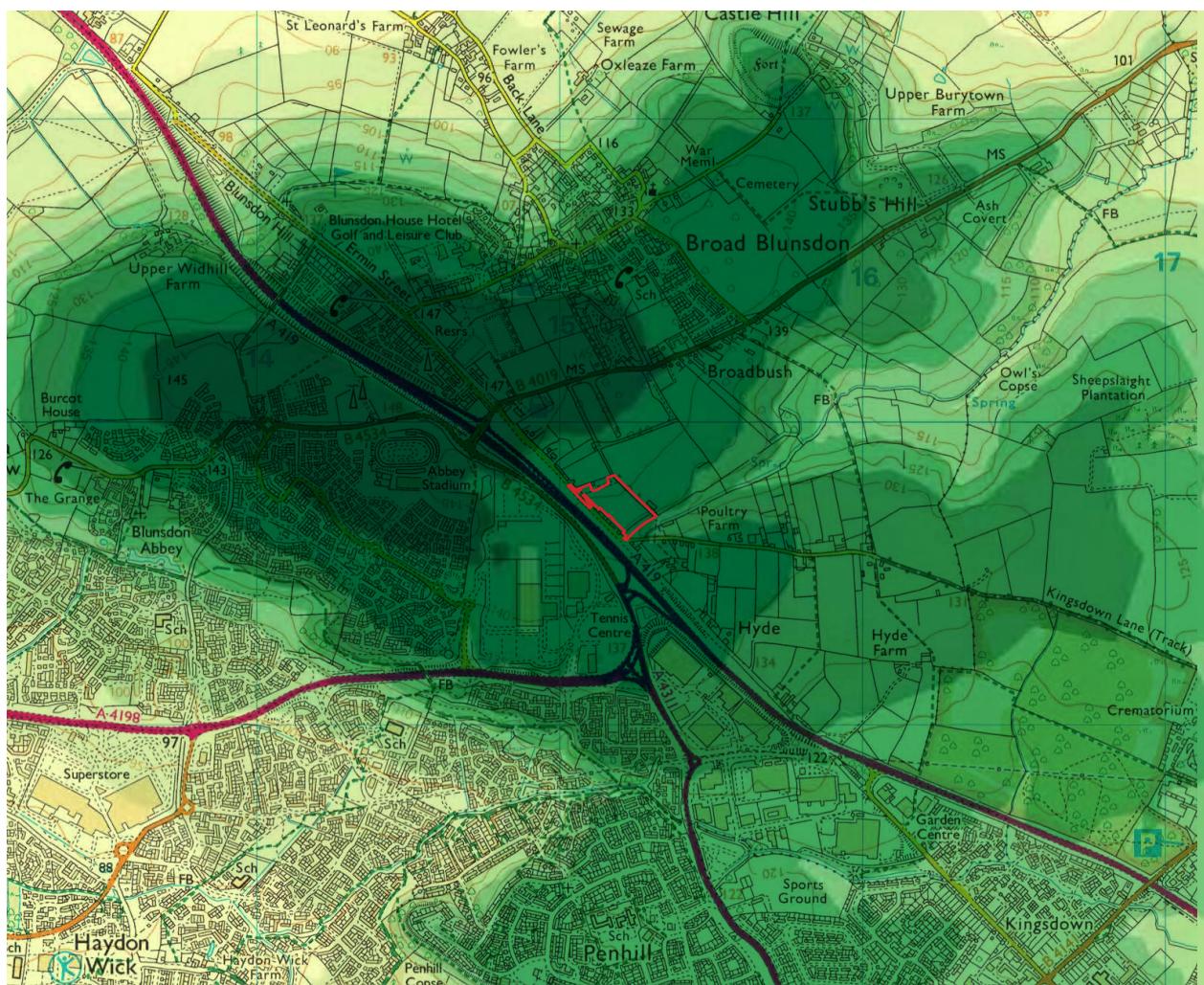
A comprehensive Landscape and Visual Assessment (LVA) has been undertaken in accordance with Guidelines for Landscape and Visual Impact Assessment, third edition (GLVIA3), published by the Landscape Institute and the Institute of Environmental Management and Assessment, in 2013. The LVA should be referred to alongside this DAS.

TOPOGRAPHY AND LANDFORM

The site lies on a gently undulating landscape at an altitude of approximately 140m AOD. Beyond the site to the northeast the land gently falls whilst to the northwest the land gradually rises up towards a local high point at Broad Blunsdon, at about 150m AOD.

The site comprises an area of grazing land, subdivided by stock fencing into a number of smaller compartments that contain a range of small agricultural outbuildings and small scattered trees. The southwestern boundary of the site is delineated by back gardens of properties on Turnpike Road. To the southeast of the site lie properties on Kingsdown Lane and the northeastern boundary of the site is lined by large parkland trees that separate the site from a car salvage yard and agricultural fields beyond.





Area Topography Plan showing height above sea level.

VISUAL CONTEXT

A visual appraisal has been undertaken for the site, this should be referred to alongside this DAS. This has explored the nature of the existing visual amenity of the area and sought to establish the approximate visibility of the site from surrounding locations and receptors. A series of photo viewpoints have been selected which support this analysis.

The site has a high level of visual containment and natural screening. The local topography, tree cover and adjacent built form result in the site having a visual envelope largely limited to adjacent properties, but with glimpsed views also possible from a number of points on Turnpike Road. Only one more distant view was identified and this was from a point looking south on the B4019 (viewpoint 9). There are views of the site around the bungalow but onward views of the rest of the site curtailed by intervening lines of vegetation. There are no views from Blunsdon village itself (see Viewpoint 10 for example).



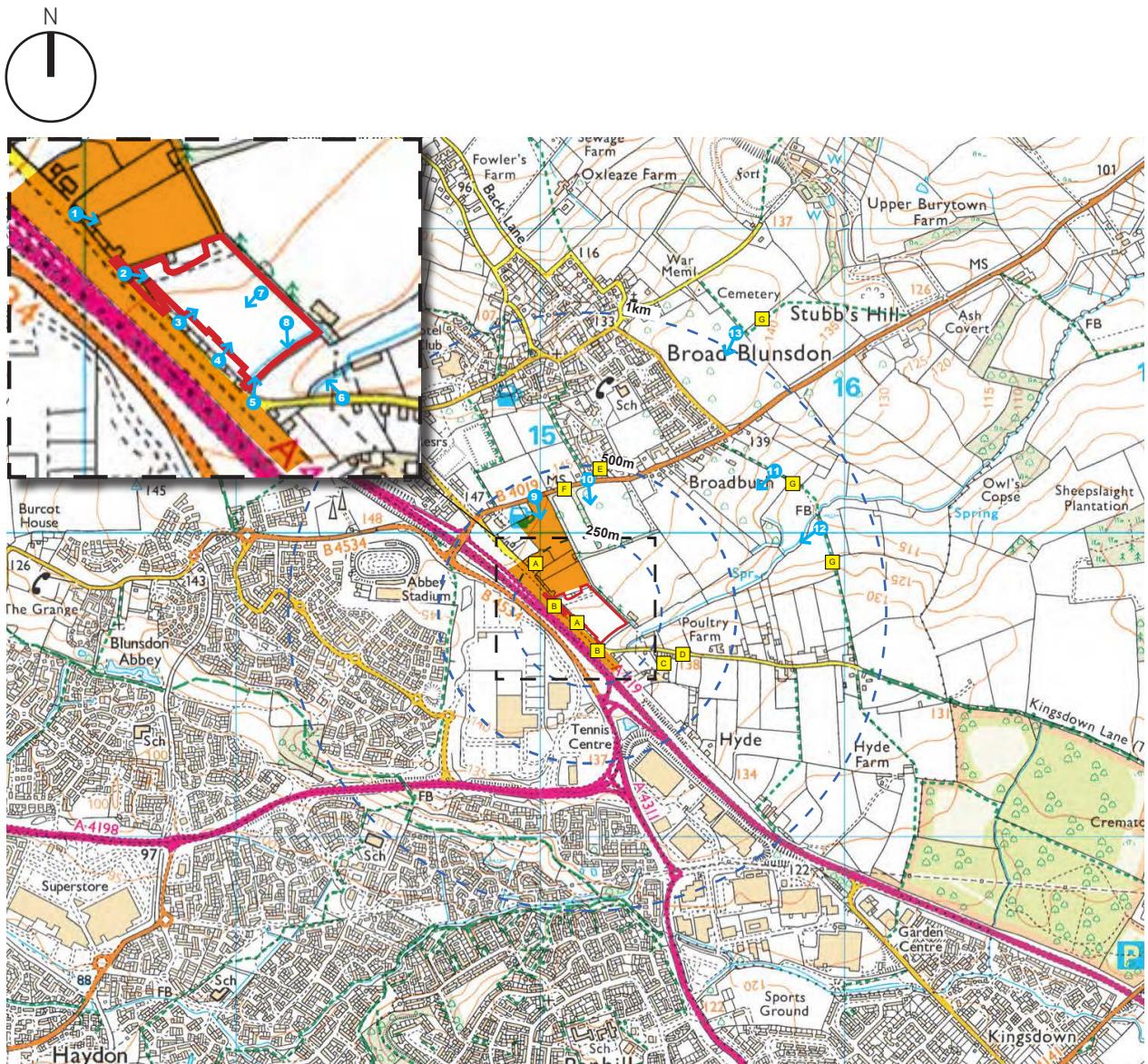
Existing home on the site



Existing landscape along northern boundary



Existing vehicular access onto Turnpike Road



Visual Appraisal Diagram



Site Boundary



Viewpoint Location



Distance Radii from Centre of Site

- A: Residents of properties on Turnpike Road
- B: Road users on Turnpike Road
- C: Residents of Properties on Kingsdown Lane
- D: Road users on Kingsdown Lane
- E: Residents of properties on the B4019
- F: Road users on the B4019
- G: Users of PROW to the east of the site



Visual Envelope

Viewpoint 2: View southeast from Turnpike Road



Viewpoint 3: View east from Turnpike Road



Viewpoint 9: View south from B4019



Viewpoint 10: View south from B4019



LANDSCAPE CHARACTER

The site lies within Natural England's National Character Area (NCA) 109: Midvale Ridge. This NCA is a band of low-lying limestone hills stretching east-west from the Vale of Aylesbury in Buckinghamshire to Swindon and therefore covers an extensive landscape area.

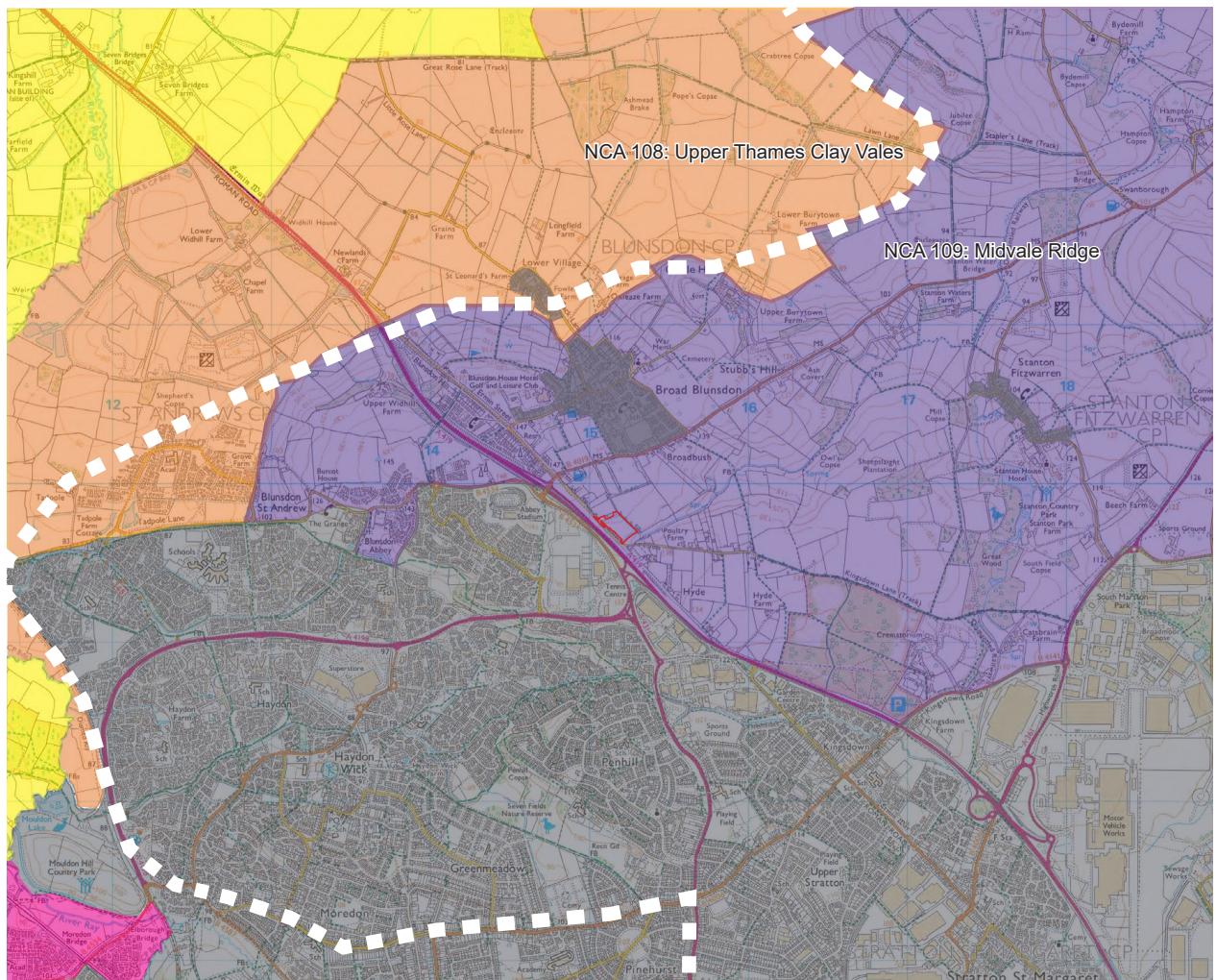
Swindon Borough Local Plan 2011 Revised Deposit Draft Landscape Character Assessment has been undertaken at a Borough level. It subdivides the landscape into a number of character areas and the site falls within the landscape character area Midvale Ridge.

The development considerations for the Midvale Character area are as follows:

- “Ensure that non-developed hilltops remain free from development to preserve the prominence and quality of existing hilltop settlements,
- Where opportunities arise, provide for additional tree planting that maintains the scale and dispersed pattern of existing woodlands,
- Provide planting to contain the development within a discrete area, reflecting the undulations of the landscape.
- Retain the perception of distinctiveness and separation from Swindon within the Rural Buffer areas identified in the Local Plan.”

These landscape character areas are identified on the plan opposite.

The LVA concludes that the landscape character of the site in terms of the field pattern and strong boundary tree cover can be preserved and protected as part of this proposal and development will not affect the setting of the village as there are no views into or out of the village from the site.

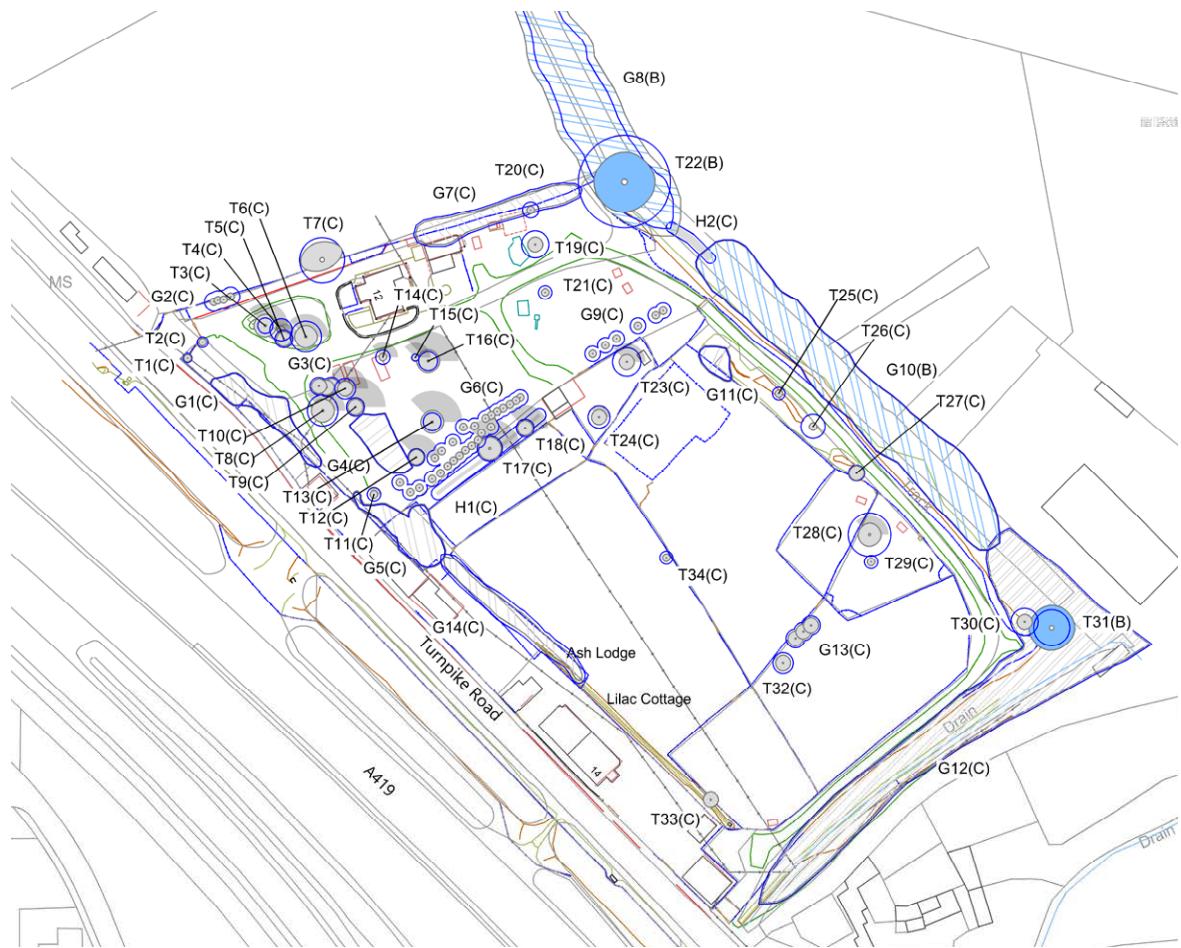


3.5. TREES AND HEDGEROWS

An Arboricultural Impact Assessment forms part of the application, with the Tree Survey Plan provided below. The amount of trees required for removal in order to facilitate the proposals would not be considered, from an arboricultural perspective, to significantly reduce the overall amenity value provided of the surveyed tree cover. The majority of boundary trees would be retained and enhanced through additional tree planting around the site to provide a high-quality setting for the proposed development. In addition the existing orchard will also be relocated in order to retain it as far as possible. The change of site use will provide a heavily treed high-quality residential development achieving long term objectives in terms of tree suitability and landscape contributions for the benefit of existing and future generations.

KEY

	Category U - Trees / Groups Unsuitable for Retention (BS 5837:2012)
	Category A - Trees / Groups of High Quality (BS 5837:2012)
	Category B - Trees / Groups of Moderate Quality (BS 5837:2012)
	Category C - Trees / Groups of Low Quality (BS 5837:2012)
	Hedgerow (Colour indicates BS5837:2012 Category)
	Root Protection Area (The RPA has been altered where appropriate to reflect underground constraints)
	Individual / Group Number and BS5837:2012 Category
	Indicative Shade Pattern (in accordance with BS5837:2012 where appropriate)



Tree Survey Plan

3.6. HISTORIC ENVIRONMENT

The Site is located adjacent to the Grade II listed The Old School, a designated heritage asset. Agricultural land within the Site forms part of the setting of The Old School and makes some very limited contribution to its significance. Based on current design plans it is considered that any harm to the significance of The Old School as a result of the proposed development would be negligible. The Case Officer responded positively to the proposal in their pre-app response with regards to heritage.

In addition, the Site is located within an area of known prehistoric and Roman period activity. There is no evidence to suggest below-ground remains of a significance greater than a non-designated heritage asset are likely to be present within the Site. Geophysical survey did not identify any anomalies of archaeological interest. However, given the remains recorded in the wider area, some form of further archaeological works would be appropriate, the scope of which should be agreed with the archaeological advisor to the LPA and which could be secured by way of a condition attached to any planning permission granted.



Northern elevation of listed Old School



Southern elevation of listed Old School on Turnpike Road

3.7. ECOLOGY

DESIGNATIONS

The Ecology Appraisal accompanying this DAS demonstrates that the development will not directly or indirectly impact on designated sites within 1km of the site due to the modest scale of the proposals, distance and lack of direct connectivity across the intervening landscape.

HABITATS

The amenity and improved grassland along with some small areas of broadleaved plantation woodland and scrub will be lost to the proposed development. These habitats provide a limited resource to biodiversity locally and the provision of new habitats within the proposed scheme including native tree and shrub planting and the installation of a sustainable drainage system (SuDS) will provide adequate mitigation to ensure local biodiversity is not affected by the proposals.

Traditional Orchards receive protection under Section 41 of the NERC and is a priority habitat within the Wiltshire BAP. It is also of high ecological value to a range of wildlife and can provide important habitat for a number of nationally rare and scarce species such as the noble chafer beetle which is a BAP species that is classified as 'vulnerable' and in decline due to neglect and loss of orchard habitats.

It is recommended that this habitat is retained as far as possible and brought back into management as a community orchard through the planting of new fruit trees and re-seeding of the grassland with a species-rich wildflower mix.

As set out above, existing hedgerows and trees are to be retained where possible within the scheme.

FAUNA

A suite of ecology surveys has been undertaken. This identified presence of 7 species of bats comprising common pipistrelle, soprano pipistrelle, noctule, nathusius pipistrelle, barbastelle, unidentified Myotis sp and brown long-eared bat. Activity was dominated by common pipistrelle, which are a common and widespread species within the UK. From the completed surveys the habitats within the site are of low ecological value being grazing pasture. The tree line along the north eastern boundary and internal hedgerows do provide suitable commuting and foraging resources for the local bat population. The level of bat activity recorded within the site is not considered to provide a significant resource to the local bat population. Furthermore, no significant commuting routes have been identified. The Ecological Appraisal concludes that no significant effects to bats have been identified, however an appropriate lighting scheme will be required during construction and incorporated into the development in order to ensure minimal light spill from the site.

No other protected species are identified as a constraint to development of the site, albeit updated surveys be required prior to development (e.g. for badgers and nesting birds).

The Ecology Appraisal provides a suite of recommendations to deliver ecological enhancement as part of the proposals, including preferred species mix for new planting, retention of boundary features and provision of bat and bird boxes. The Ecology Appraisal should be referred to for more details.

3.8. OTHER TECHNICAL CONSIDERATIONS

FLOOD RISK AND DRAINAGE (SURFACE WATER AND FOUL)

The site is sequentially preferable lying in Flood Zone 1 and at very low risk of surface water flooding. The Flood Risk Assessment accompanying the application sets out a sustainable drainage strategy for the site to safely retain excess surface water whilst restricting the rate of discharge to existing greenfield run-off rates for storms up to the 1 in 100-year return period (+40% for climate change).

Foul sewerage from the proposed development will discharge via a new pumped connection into the Thames Water sewer, the proposed outfall location is within the junction of Ermin Street and Lady Lane. Network capacity modelling and sewer upgrading works will be required before the full development can discharge to the existing sewer network.

NOISE

The presence of noise from the A419 has informed the design and layout of the scheme, based on the results of noise surveys undertaken in 2019. The Noise Assessment should be referred to for further details.

Essentially we have used the proposed built form to both overlook the public open space and act as a noise barrier to the other homes behind these. Ensuring an appropriate environment for users both in their homes and rear gardens.

Furthermore, the Noise Assessment provides recommendations to reduce external sound levels to as low a level as practicable in accordance with the principles of good acoustic design. On this basis the Noise Assessment demonstrates that the site is suitable for residential development.

AIR QUALITY

Impacts arising from construction activities and vehicle emissions associated with the development have been considered as part of the Air Quality Assessment submitted as part of the planning application.

Qualitative assessment of dust levels associated with the proposed development has been undertaken. The impact of dust soiling and PM10 can be reduced to negligible through the suite of mitigation measures set out as part of the assessment, to be included as part of a construction environmental management plan.

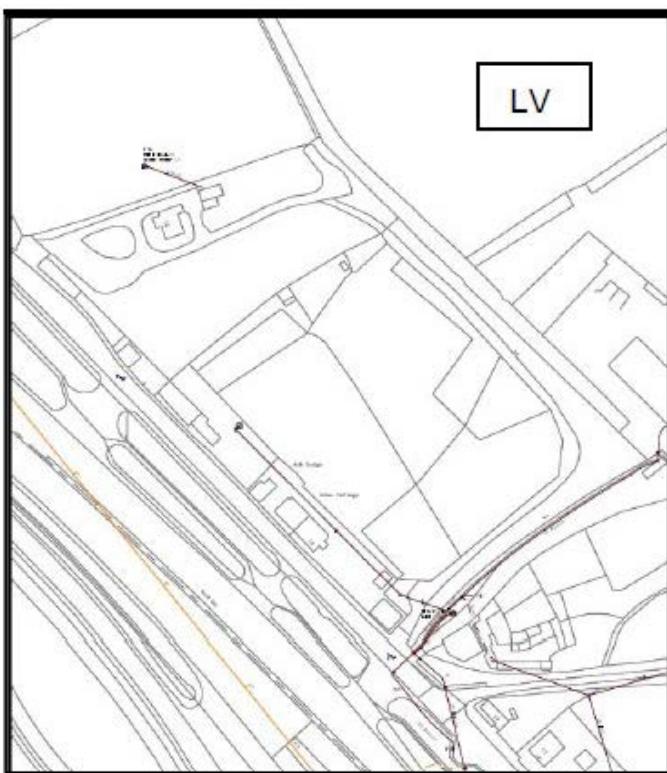
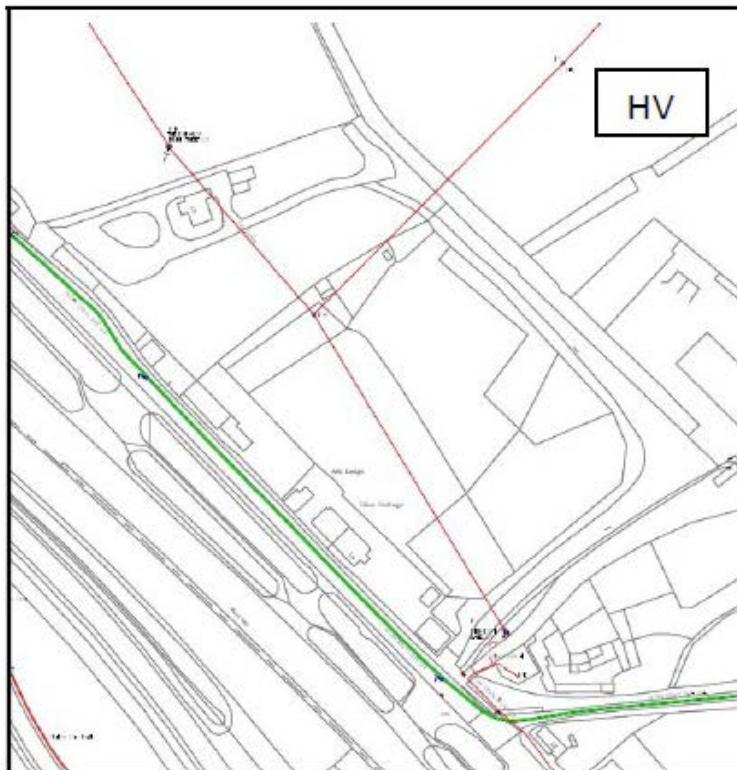
With respect to vehicle emissions the Air Quality Assessment recommends the provision of 1 Electric Vehicle (EV) rapid charge point for every 10 dwellings plus implementation of a Travel Plan to help encourage sustainable transport choices (public transport, walking and cycling). The submitted Travel Plan provides further details on how this can be achieved.

UTILITIES

SSE has 11 kV overhead cables crossing the Site which will need to be diverted and undergrounded as part of the development. The new electricity supply for the Site will connect to the diverted 11 kV cables and a new onsite substation will therefore be required, the transfer of suitable land to SSE will need to be considered as part of the masterplanning. In addition, off-site reinforcement is required to the water supply and foul drainage network, subject to further modelling at detailed design stage and prior to development.

LAND QUALITY AND GROUND CONDITIONS

A Phase 1 Site Appraisal has been undertaken which shows that the site is suitable for the proposed development, subject to further intrusive investigations being undertaken prior to development.



SSE Electricity Lines Constraint Plans

4. DESIGN PRINCIPLES

4.1. DESIGN EVOLUTION

The design and development of the Concept Masterplan and development proposals have been founded upon a core set of design principles, that have been drawn from an understanding of the site, its unique context and local requirements.

GUIDING DESIGN PRINCIPLES

The Indicative Concept Masterplan on the opposite page illustrates the key guiding design principles for the site:

- » Development nestles within high quality landscape and public open space
- » Primary and secondary movement routes ensure connectivity throughout the development.
- » Retention and enhancement of existing soft landscape features where possible to enhance biodiversity and maintain green infrastructure within the site.
- » The nearby village centre is within walking distance.
- » Public open space to the south creates an appropriate response to the listed asset to the south.
- » Potential to utilise topography to incorporate Sustainable Urban Drainage Systems.

4.2. CONCEPT MASTERPLAN

The Concept Masterplan demonstrates a scheme that can deliver:

- » Up to 55 new homes (30% affordable)
- » New Public Open Space, including LAP, as part of attractive setting to Grade II Listed Building
- » Potential for new orchard-type planting, alongside retention and enhancement of existing boundary trees and hedgerows.

4.3. LAND USE BUDGET

Gross Site Area	2.1ha
Net Developable Area	1.4ha
Public Open Space	0.6ha
Infrastructure	0.1ha



Indicative Land Use Plan



— Site Boundary (2.05ha)

- 1.** Main Access
- 2.** Listed Building
- 3.** Setting to Listed Building, including Public Open Space and Sustainable Drainage
- 4.** Orchard Planting and Habitats
- 5.** Landscaped Street with Attractive Frontage on to Public Open Space
- 6.** Terraced Blocks with Frontage Parking

7. Potential Pedestrian / Cycle Access

- 8.** Shared Surface Square
- 9.** Shared Surface Street
- 10.** Private Driveway
- 11.** Landscaped Shared Surface Street
- 12.** Retained and Enhanced Landscape Buffer

A. Lindsey's Yard. Application Ref: S/OUT/18/2007 (Planning permission granted on 22nd March 2018)

4.4. CONSULTATION & ENGAGEMENT

CONSULTATION

A pre-application meeting was held with SBC on 2nd July 2019 and written advice received on 12th July 2019, supplemented by further correspondence received from SBC's heritage officer on 9th July 2019. In addition, separate discussions also took place with Highways England (HE) and the Highway Authority (HA) to inform the scope and extent of transport modelling.

A meeting was held with Blunsdon Parish Council (BPC) on 15th October 2019 to introduce the proposals and seek their feedback.

A leaflet was prepared to introduce our draft proposals to local residents and businesses. 54 leaflets were issued to residents and businesses within the vicinity of the site on 23rd October 2019. The distribution area was focussed on the areas immediately around the application site as shown on the map below. 25 leaflets were also sent to the Parish Clerk to be left in Blunsdon Village Hall for members of the community to view and make comments.



ENGAGEMENT

On Tuesday 15th October 2019 key members of the Parish were consulted on their views of the development proposals. The Councillors thanked the project team for taking the time to update them on the project progress and for consulting them on the proposals. Whilst the Parish Councillors were unsure of the need for housing in the area they did appreciate how the design proposals responded to the local context.

Bellway

Plans for New Homes at Turnpike Road, Blunsdon

Neighbour Consultation

Our proposals

Bellway Homes are currently preparing an outline application for new homes on land at Turnpike Road, Blunsdon.

The 2.2 hectare (5.4 acre) site is an important opportunity to meet local housing needs.

The purpose of this leaflet is to let you know about our proposals, provide contact details for further information and set out what happens next.

CONSEQUENCES OF CONSULTATION

As a consequence of this consultation and engagement we:

- Revised the illustrative masterplan to create a gateway area into the site to create a sense of arrival in this green space.
- Revised the structure of the heritage statement in response to points made by SBC's heritage officer
- Undertook additional transport modelling and testing following comments raised by HE and the HA, particularly to test cumulative impacts on the Cold Harbour junction
- Provided a further review of accident records in the Transport Assessment, including along the A419 following comments raised by BPC
- In response to queries from BPC we set out further details on how the site will connect to the new primary

school and facilities to be provided as part of the Kingsdown allocation and how the site will tie in with ped/cycle improvements to Turnpike Road planned as part of that scheme (see Kingsdown Pedestrian Links Plan in Constraints and Opportunities Section).

- Identify BPC's desire for bungalows as part of any future housing mix both as part of this DAS and in the Planning Statement. The specific housing mix will be determined as the project progresses, ensuring that the proposed mix is appropriate to the site.
- Address air quality issues raised by BPC as part of a comprehensive Air Quality Statement
- Emphasise the site's proximity to employment opportunities, including those in and around Swindon, further to comments raised by BPC

Further details are included in the statement of community consultation enclosed as part of the Planning Statement.

The proposed development
An illustrative masterplan has been prepared which demonstrates that the Site can accommodate a mix of house types and tenures within an attractive green setting.

The main features and benefits of the scheme include:

- Up to 55 homes – at a density of 36 dwellings per hectare – of which 30% will be designated as affordable in accordance with local planning policies
- Provision of a children's play area, ecological habitats and sustainable drainage, with one third of the site proposed as green space
- Creation of an attractive setting to the Old School Grade 2 Listed Building, comprising new public open space and orchard planting
- As a deliverable Site within the control of a 5th housebuilder the Site will make an important contribution to Swindon Borough Council's supply of housing land
- Living on the edge of Swindon the Site is in a sustainable location close to jobs, community facilities and public transport, complementing further development proposed at Kingsdown

Illustrative masterplan

Site location

Site boundary

What happens next?

We are currently undertaking a number of technical studies and surveys to inform our proposals. Once these are complete, we anticipate that an outline planning application will be submitted to Swindon Borough Council in November 2019.

Once the application has been submitted it will be published on the Council's website for all interest parties to view, and there will be a formal opportunity to comment on the application directly to Swindon Borough Council.

If you have any queries regarding these proposals or would like to discuss them further, then please do not hesitate to contact:

David Fovargue
Wood plc, Nicholls House, Homer Close, Leamington Spa, Warwickshire CV34 6TT
Tel: 01926 439000
E-mail: haveyoursay@woodplc.com

Bellway Homes examples

wood.

Bellway

4.5. LANDSCAPE - GREEN INFRASTRUCTURE

The masterplanning process coupled with the GI framework has sought to minimise impacts on landscape character and visual amenity through the retention of landscape features of particular value and the delivery of new habitats to assimilate development into the landscape.

The vast majority of the hedgerows and mature trees are to be conserved as part of the proposals and these would be strengthened by new landscape habitats (the plan opposite provides an indicative tree & hedgerow retention plan).

Whilst there would inevitably be some adverse landscape and visual effects at the outset (on completion), it is judged that the effects of the proposed development and the consequential effects would, however, be localised and limited in their extent. The GI proposals which cover some 26.9% of the site would, for example, deliver environmental benefits. The creation of landscape buffers and areas of open space with associated tree planting would help to assimilate the development into the surrounding GI network and help to soften and filter views from adjacent properties.

The visual envelope of the site is restricted by landform, the extensive boundary vegetation and vegetation cover in the surrounding landscape, such that views of the proposed development would be largely restricted in extent to views experienced by residents in adjacent properties and users of Turnpike Road. The proposed on-site planting would effectively enhance the existing level of screening, further softening and filtering views of the proposed development for these receptors.

The landscape character of the site in terms of the field pattern and strong boundary tree cover will be preserved and protected as part of this proposal and development will not affect the setting of the village as there are no views into or out of the village from the site.

In conclusion, it is assessed that the design and mitigation approaches adopted by the proposed development through its design and masterplanning would minimise impacts on landscape and visual receptors in the longer term, such that the residual adverse effect would lessen. In conclusion, it is assessed that the Proposed Development would not result in any unacceptable long-term landscape and visual effects.



Tree Retention Plan

KEY

-  Tree/Group to be Retained
-  Tree/Group to be removed to facilitate the proposals
-  Category U - Unsuitable for retention on arboricultural grounds
-  Hedgerow Proposed to be Retained and Incorporated into the New Development
-  Hedgerow Proposed to be Removed to Facilitate the Development upon Approval of the Application
-  Root Protection Area (Shown for retained trees only)
-  Individual / Group Number and BS Category

4.6. ACCESS & MOVEMENT STRATEGY

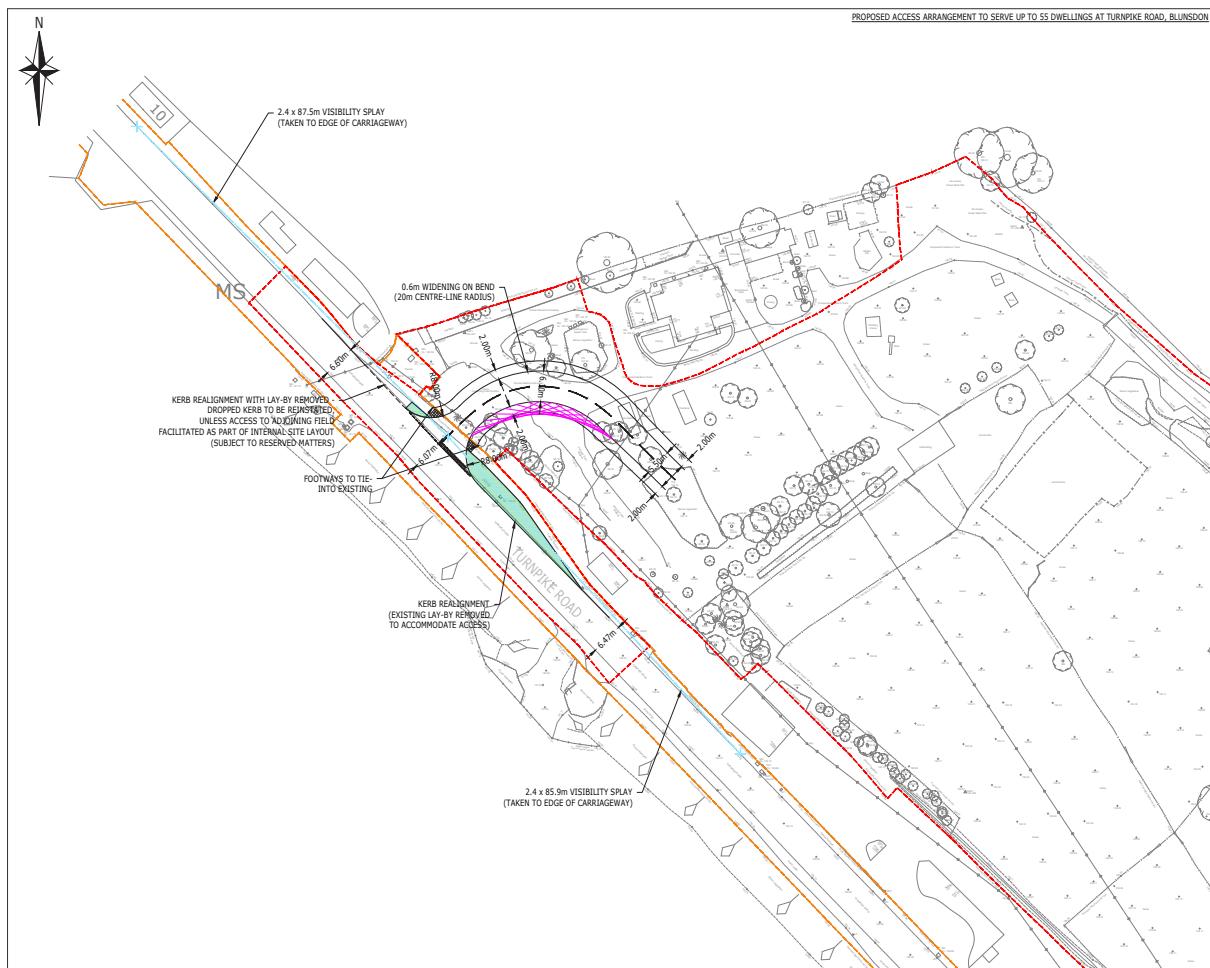
The Site has potential to link well into the wider movement network, and the primary and secondary streets within the site create an informal grid that aids permeability.

Attractive pedestrian and cycle links to Turnpike Road to the south of the site will help encourage active travel.

Access into the site will utilise the existing access point from Turnpike Road. This will form the primary access and route serving the development, and there is also potential to use a pedestrian and cycle access point to the southeast, which could double up as emergency access.

SITE ACCESS

Drawing Number 187060-002B shows the general layout of the proposed site access to serve the site, which has been designed in accordance with both Manual for Streets and local design requirements. It has also been demonstrated that level of trips which are associated with the site are not expected to result in severe negative impacts within the surrounding highway network, in particular at the Cold Harbour mini-roundabout and A419 Overbridge.



Access Junction Drawings



Access & Movement Strategy

- Primary Route 
- Secondary Route 
- Pedestrian/Cycle Connection 

5. DELIVERY

5.1. BELLWAY EXPERIENCE

Bellway are an FTSE 250 major PLC housebuilder that delivered just over 10,800 new homes across the UK last year. Bellway are proud to have been awarded 5 star homebuilder status by the House Builders Federation as a result of their emphasis on build quality, customer care and health and safety; and build and sell high quality homes to suit local housing styles as well as providing social housing to housing associations.

Since their beginning over 70 years ago, Bellway now operate from 21 trading divisions which are located in the main population centres in England, Scotland and Wales. This structure enables their divisional management teams to use their localised knowledge and working relationships to buy land, design, build and sell homes which are attractive to customers and help build local communities. Having successfully delivered a housing development nearby at Tadpole Garden

Village, the site is located in a key area for Bellway operationally and there is a substantive appetite to successfully promote land in the area to build homes.

As such, Bellway have recently acquired control of this highly sustainable site in Blunsdon. Their experienced multi-disciplinary consultant team have assessed the site and consider it suitable for delivery of up to 55 new homes, including affordable housing and other community uses. The landowners have carefully chosen Bellway as their development partner to ensure a positive legacy locally and seek to deliver community benefits too.

Bellway are fully committed to delivering a sustainable development in Blunsdon and seek to work proactively with the Council and local community to make this happen.



5.2. SUMMARY OF DEVELOPMENT BENEFITS

This document clearly articulates the opportunities presented by the Site, and shows how development would accord with the requirements of the NPPF and can:

-  Meet housing needs as an appropriate growth progression of Blunsdon with strong connections provided back into the village centre.
-  Provide a high-quality environment using well considered urban design principles and landscape to meet the needs of future and existing residents.
-  Create a network of pedestrian and cycle routes through public open space to key destinations and public transport links to increase accessibility and encourage sustainable movements to and through the site.
-  Propose an appropriate edge to mitigate the impact upon the landscape and help assimilate the development into its surroundings.
-  Make the most of the attractive views within the site, adding to the character of the development and improving the amenity of new residents.
-  Provide additional land set out for public use, which will form an appropriate response to the listed asset.
-  Retain (where possible) existing soft landscape features and provide new green infrastructure to develop attractive green corridors through the development.
-  Provide a safe and convenient access onto Turnpike Road.



**BARTON
WILLMORE**



Respondent No: 488

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title Mrs

Q2. First Name Amy

Q3. Last Name James

Q4. Job Title (where relevant) Associate Director

Q5. Organisation (where relevant) Tetlow King Planning on behalf of Ms Alanna Mahoney of
Richborough

[REDACTED]

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

SBC admin note: please see attached response

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

not answered



Swindon Borough Council
Planning Policy
Civic Offices
Euclid Street
Swindon
SN1 2JH

Date: 13 October 2025

Our Ref: AEJ M25/0910-01

By email only:
SwindonLocalPlan2043@swindon.gov.uk

Dear Sir/Madam

RE: SWINDON DRAFT LOCAL PLAN 2023-2043 REGULATION 18 CONSULTATION – DAY HOUSE LANE, SWINDON

Thank you for the opportunity to respond to the Swindon Draft Local Plan 2023-2043 Regulation 18 consultation. This representation has been prepared by **Tetlow King Planning** (“TKP”) on behalf of our client **Richborough** in relation to its land interests at Land at Day House Lane, Swindon. We enclose a site location plan (**Appendix 1**) and completed Representations Form (**Appendix 2**).

These representations should be read alongside the accompanying Vision Document (**Appendix 3**) promoting the site for consideration as a future residential allocation. The site has also been submitted as part of the Call for Sites consultation which is taking place concurrently with this consultation.

The northern part of the site was assessed as part of the 2025 Strategic Housing and Economic Land Availability Assessment (SHELAA) and was given reference S0455, with the Council determining that the site is not suitable, achievable or deliverable. The Council’s suitability Note states “*significant concerns regarding heritage and ecology and some concern relating to landscape*”. However, it is not clear what site specific evidence this is based on, and it is assumed that this has been gathered through a desk-based assessment only. Furthermore, there is no explanation or reasoned justification provided to accompany the Red/Amber/Green grading of the site.

As set out in the accompanying Vision Document, following further, more detailed assessment of key technical matters such as heritage, ecology and landscape, which has included specific site visits from qualified professionals in each discipline, it has been demonstrated that there are no technical matters which would prevent residential development being delivered at this site.

It is proposed that the site would make an appropriate, and deliverable, allocation for housing. We use this opportunity to present to the Council the relevant attributes of the site for development (please refer to the Vision Document) and also provide comments on the Council’s proposed approach to the future development of Swindon and draft policies contained within the draft Local Plan.

It is requested that these comments are taken into account as the emerging Local Plan continues to progress and we ask that we are placed on the mailing list to receive progress updates and be notified of any forthcoming consultation opportunities.

The Emerging Spatial Strategy and Distribution of Development

Draft Policy SS1 sets out Swindon’s proposed approach to future growth, noting that the main focus will be on Swindon Urban Area Sustainable Development Locations and the Strategic Growth Location. Whilst it is appreciated that growth does need to be focused to sustainable locations, as discussed in greater detail in subsequent parts of these representations, having such a narrow focus for future growth is a risky strategy that could end up with local development needs not being met.

Directors

J Stacey BA (Hons) Dip TP MRTPI
J M Adams BA (Hons) BTP MRTPI

I Warner BSc (Hons) Dip TP MRTPI
A Moger BA (Hons) MA MRTPI

Large urban regeneration or strategic growth locations often have complicated land ownerships, numerous technical issues and requiring significant funding and infrastructure in order to be ready to come forward for development. As can be seen by the fact that a number of the Strategic Sites from the adopted Local Plan are being suggested as sites to be allocated in the emerging Local Plan, demonstrates that these sites are often subject to delay and uncertainties regarding overall deliverability.

Furthermore, these sites tend to offer a certain type of development, which is high density, often high rise developments and whilst will meet some of the local needs, this type of development will not meet all local needs, for example those wanting family housing with private amenity space. It is, therefore, critical that a range of sites across the Borough are allocated for housing that are able to offer lower density family housing schemes and come forward without being reliant on funding or significant investment in infrastructure; sites such as Land at Day House Lane.

These points are discussed in greater detail throughout the representations, however, it is important to highlight that the spatial approach to growth as currently drafted is too restrictive and narrow in its focus and risks not actually being effective in meeting the local needs of the Borough.

New Local Plan Period

When preparing Local Plans, the National Planning Policy Framework (NPPF, 2024) notes that Strategic Policies should *“look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities”* (paragraph 22).

The emerging new Local Plan is currently based on the Plan period 2023 – 2043. However, when factoring in the remaining stages of preparation, consultation and examination, the Council's current estimation is that the Plan will be adopted in December 2027 (Swindon Local Development Strategy, March 2025). Therefore, this would just enable the emerging new Local Plan to look forward over the required 15 year period.

Whilst there is a drive from the Government to get new Local Plans adopted, given that the Swindon Plan is only at Regulation 18 Stage and the level of feedback to address and consider is unknown at this stage, it is possible that its adoption could be delayed beyond December 2027. The current Plan period does not allow for any slippage of these timescales. Therefore, to provide flexibility and ensure that the Plan is able to look forward over a 15 year period, it is recommended that the end date for the Plan period be extended to 2045.

Housing Requirement - Draft Policy SP2: Homes for the Community

Draft Policy SP2 sets out that the Council's housing requirement, as per the most up to date standard method, is 1,205 homes per year. Over a proposed Plan period of 20 years (2023 – 2043), this equates to 24,100 new homes.

The Foreword to the emerging new Local Plan refers to the Local Plan as setting a *“bold vision”* for Swindon. Planning Practice Guidance (PPG) is clear that authorities should *“use the standard method as the starting point”* (emphasis added) (paragraph 68-001-20241212). It is, therefore, important that any housing requirement figures are only expressed as a minimum figure to encourage growth and represent a *“bold vision”* for the future development of Swindon. This aligns with the Government's overall objective of *“significantly boosting the supply of homes”* (NPPF, paragraph 61).

Draft Policy SP2 should, therefore, seek to encourage sustainable residential development to come forward and not view the housing requirement as a cap that once reached is a means of restricting development.

Overall Housing Requirement

The supporting text for draft Policy SP2 is provided on page 61 and sets out how the Council intends to meet the overall housing requirement of 24,100 homes over the Plan period. Based on the information provided at paragraph 6.5 and 6.6, the table below has been prepared which shows the breakdown of the anticipated sources of supply over the Plan period:

Table 1: Anticipated Housing Delivery

Source of Supply	Council's Anticipated Delivery
Net Completions 2023/24	831 dwellings
Planning Permissions Granted	12,767 dwellings
Roll over of Strategic Site Parcels without planning permission from the 2026 Local Plan	3,498 dwellings
Allocation of new sites	8,344 dwellings
Total	25,440 dwellings

The Council anticipates it will have a buffer of 1,340 dwellings, excluding potential windfall sites, over the Plan period. However, if the Plan period was extended to 2045, as per what is being recommended above, then the Council's anticipated delivery of housing over the Plan period would actually result in a shortfall and fail to meet the required and identified housing needs.

Against a revised requirement of 26,510 dwellings, there would actually be a shortfall of 1,070 dwellings ($26,510 - 25,440 = 1,070$), indicating that additional sites, such as Land at Day House Lane, will be required in order to meet housing needs. This is before any of the concerns regarding the Council's anticipated delivery are considered.

Focusing on the rolled over Strategic Sites, these are allocated in the current Local Plan, which was adopted back in 2015, making these allocations now 10 years old. It is also worth highlighting that the evidence presented on the deliverability of these sites will be more than 10 years old as the Examination Hearing Sessions on the Local Plan 2026 concluded in May 2014. Therefore, this raises serious questions as to whether these sites are in fact deliverable given that they have not come forward for development in the last 10 years and most do not have an extant planning permission which could be built out in the future.

Appendix 4 to these representations provides a detailed assessment of each of the rolled over Strategic Sites, however, a summary of the key points is provided below:

- Great Stall West (Regulation 18 Site Ref: 18-013), SHELA notes it has potential to provide strong commercial or residential frontage, therefore, there is no guarantee it will come forward for housing;
- Upper Lotmead (Regulation 18 Site Ref: 18-014), concerns are raised in relation to archaeology and potential flood risk in the 2025 SHELA;
- Green Lane (Regulation 18 Site Ref: 18-041), SHELA red rating on landscape with significant concerns being raised, in particular with regards to the direction set out in the New Eastern Village Green Infrastructure SPD. It is also noted that there is a current lack of facilities/services, with the site being reliant on the adjacent allocation coming forward to deliver these;
- Redlands Village (Regulation 18 Site Ref: 18-043), whilst there is no requirement for the New Eastern Village allocation to come forward in a specific sequence, this site is below Green Lane, and if that site doesn't come forward or is delayed, then this is likely to impact upon the deliverability of this site; and
- Wichenstowe (Regulation 18 Site Ref: 18-018), the adopted Local Plan openly acknowledges that economic conditions have delayed delivery and created uncertainty over the implementation of development on this site.

Therefore, it is clear that there are uncertainties associated with the carried over Strategic Sites and to rely upon these to provide a significant proportion of the future development required across Swindon, risks the "*bold vision*" and development needs of Swindon not being suitably met.

With regards to a number of the proposed draft allocations, these are large mixed use regeneration sites which are often reliant on the availability of substantial levels of funding and investment, alongside significant infrastructure being delivered in order to come forward. As is already evident from the fact that some of the Strategic Sites allocated in the Local Plan 2026 have not yet come forward, large regeneration sites can be challenging to deliver and are often slower to come forward and start yielding development than anticipated.

At this stage a detailed assessment of each of the proposed new draft allocations has not been carried out in terms of analysing the evidence underpinning site deliverability. However, it is important to note that relying on these large regeneration sites to meet the required and identified housing needs should be treated with caution, and a range of smaller sites that are less constrained, less reliant on funding and large scale infrastructure being provided, such as Land at Day House Lane, should also be allocated to provide flexibility and ensure a more steady delivery of housing throughout the Plan period. Importantly, such smaller sites would deliver earlier in the Plan period and fill any gaps in supply left as a result of larger regeneration site delays.

Five Year Housing Land Supply

The Five Year Housing Land Supply Statement (1 April 2025 to 31 March 2030) sets out the Council's position as only being able to demonstrate 4.9 years supply of housing for the five year period 1 April 2025 to 31 March 2030.

In accordance with the NPPF (paragraph 78) and Planning Practice Guidance (PPG), as Swindon's adopted Local Plan is more than five years old, the current housing land supply calculations are based on the local housing need figure using the current standard method. This generates an annual local housing need figure of 1,195 dwellings; equating to a need of 5,977 dwellings over the five year period.

On the basis of the 2023 Housing Delivery Test (HDT) result for Swindon being above 85% (latest result was 97%), then only a 5% buffer is applied to the housing land supply calculations.

In terms of the breakdown of the identified supply, page 9 of the Five Year Housing Land Supply Statement shows an allowance is made of 237 dwellings (79 dwellings per annum in years 3, 4 and 5) to come forward on small-scale windfall sites. Paragraph 5.4 of the Five Year Housing Land Supply Statement explains that based on the previous two monitoring years there has been an average of 78.5 (rounded to 79) net completions composed of minor windfall developments.

It is acknowledged that an allowance can be made for windfall sites as part of anticipated housing land supply. However, as required by the NPPF, this should only be the case where there is "*compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic*" (paragraph 75). Swindon's basis for including an element of windfall sites in the supply is only based on two years of monitoring data which is not "*compelling evidence*" (emphasis added) that windfalls are a reliable source of supply.

As a result, the 237 dwellings anticipated to come forward from windfall sites should be removed from the housing land supply.

Annexes A-D of the Five Year Housing Land Supply Statement set out a full list of all sites included within the supply. At this stage, a detailed assessment of each of the sites included within the Council's housing land supply has not been carried out. However, set out below are some high level observations questioning the deliverability of some of the sites included.

The largest category of supply sites is from Strategic Site allocations. The NPPF is clear that:

"where a site has outline planning permission for major development, has been allocated in a Development Plan, has a grant of planning permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years" (Annex 2).

Most of the Strategic Sites included in the supply have planning permission, however, the Kingsdown allocation in Blunsdon has a decision pending, therefore, does not yet have planning permission. The application at this site (S/OUT/17/1821) was heard at Planning Committee in December 2023, however, over 18 months later planning permission has still not been granted as the S106 Legal Agreement is outstanding. It is appreciated that S106 Agreements can be time consuming to complete, however, the fact that it is almost two years since the application received a resolution to grant planning permission, suggests that there might be viability challenges associated with the scheme and the contributions that it is being required to deliver.

Returning to the NPPF definition of a deliverable site, the slow progress of the S106 at the Kingsdown site is not *“clear evidence that housing completions will begin on site within five years”*. On that basis, the 470 dwellings are included in the supply over the next five years from this site should be removed.

If just the windfall allowance and the Kingsdown site are removed from the Council’s identified supply (6,456 dwellings) this reduces the total number of dwellings in the identified supply to 5,749 dwellings (6,456 – 237 – 470 = 5,749).

When this revised supply is measured against the housing requirement (1,195 and 6,276 over five years), this reduces the housing land supply position to 4.57 years.

In short, even without increasing the Plan period to 2045, there is concern that insufficient housing allocations have been identified in the Regulation 18 Draft Plan and that if additional sites are not allocated then Swindon risks not being able to fully meet its identified housing need as required by the NPPF (paragraph 61). Land at Day House Lane is a sustainably located, deliverable site that is available now to come forward and start delivering much needed market and affordable housing. The Vision Document accompanying these representations provides further details on the site context and deliverability of Land at Day House Lane, alongside an initial indicative masterplan as to how the site could be developed taking account of the characteristics of the site and its surroundings. On this basis, the site should be identified as a housing allocation as the emerging new Local Plan progresses.

Draft Policy SP2 Parts (a) and (b)

The second part of draft Policy SP2 focuses on how the Council intends to meet the housing requirement and this includes at criteria (a) and (b), encouraging and supporting mixed-use development in the Central Areas and proposals for tall buildings. Whilst it is acknowledged that a key aim of the Local Plan is to achieve the regeneration of the Town Centre and that providing housing within the Town Centre should form part of the overall growth strategy, there is a risk that too much emphasis is being placed on the housing needs being met through Town Centre apartment schemes.

Paragraph 6.4 of the Regulation 18 Draft states that there is a need to secure *“the right types of housing to meet the needs of our growing communities”*. Therefore, whilst there will be some demand for Town Centre apartments, these won’t cater for the full needs of the local community, many of whom seeking family housing with private amenity space. The Swindon Local Housing Needs Assessment (LHNA) Overall Housing Need Update Annex (June 2025) sets out at figure 1.2 that over the Plan period, the size of market housing most in demand will be for four bedroom properties and of the affordable tenures, three bedroom properties will be most sought after.

It is, therefore, critical that a wider range of sites are identified to come forward and meet the wider and diverse needs of the local communities within Swindon. The site at Day House Lane is of a sufficient size to provide a mix of different size and style of family dwellings each with private amenity space, in an attractive setting which also offers areas of Public Open Space, providing an alternative to the Town Centre schemes anticipated to come forward and meeting the identified needs for larger three and four bedroom properties identified in the LHNA Overall Housing Need Update Annex.

Duty to Co-operate

The NPPF (2024) sets out that Local Planning Authorities (LPAs) and County Councils continue to be under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries (paragraph 24). The PPG notes that strategic policy-making authorities are required to cooperate with each other, and other bodies, when preparing, or supporting the preparation of policies which address strategic matters, including those policies contained in Local Plans.

The Swindon Statement of Community Involvement July 2024 also acknowledges that LPAs have a legal responsibility and duty to cooperate. It notes on page 5 that the Council will carry out its duty to cooperate responsibilities and document the process through an action plan approach, indicating that Statements of Common Ground (SoCG) are also one way in which this will be demonstrated.

However, there is no action plan or SoCG accompanying the Regulation 18 Draft Local Plan, therefore, there is no evidence presented to demonstrate whether or not Swindon has met its duty to cooperate. This omission should be rectified as comments on the compliance, or not, with this duty can only be provided once this information is available. Therefore, it should be provided in the short term to ensure that as the Plan progresses this duty has and is being met and there should be the opportunity to review and provide any further comments on this matter at that stage.

Affordable Housing

The national definition of affordable housing is set out in Annex 2 to the NPPF (2024). This is the definition used by LPAs when making provision within their areas to meet local demand/need for affordable housing. This revised NPPF definition, first introduced in 2018, incorporates social and affordable rented tenures, as well as a range of intermediate and discounted market sale products which provide an array of affordable routes to homeownership such as shared ownership and First Homes which are specifically designed to help first-time buyers onto the property ladder.

The need for subsidised housing provision has long been recognised. The cost of private sector housing that meets acceptable standards, compared with the level and distribution of incomes and assets, means significant numbers of households lack the resources to make a demand for decent housing effective in the market. Without subsidised housing, these households may fail to obtain housing of a decent standard. There are significant social and economic consequences for failing to meet affordable housing needs at both national and local authority level, which include poor impacts on physical and mental health, lack of financial security and stability, and negative impacts on children's education and development.

Affordable Housing Needs and Delivery in Swindon Borough

Within adopted policy and a wide range of other plans and strategies, providing affordable housing has long been established as, and remains, a key priority in Swindon Borough. The Regulation 18 draft Plan recognises the responsibility that the Council has in delivering sufficient affordable housing, positively including Strategic Objective SO3 to ensure that the right types and tenures of housing are delivered to meet the needs of current and future residents. We note that SO3 references the need to *"push for affordable housing"* delivery in the Borough. Furthermore at paragraph 6.2 of the draft Plan, the Council acknowledges that providing affordable housing is an essential element of housing delivery and it is integral to creating a fairer and more inclusive Swindon. Draft Policy HC2 'Affordable Housing' requires that all major residential development will be expected to maximise affordable housing delivery and provide, as a minimum, 30% affordable homes. This requirement is supported providing it has been robustly viability tested.

Allocating the site at Land at Day House Lane for housing development would enable the delivery of much needed new affordable homes in the area. This would assist the Council in achieving its strategic objective and would be appropriate given the acute need for affordable housing in Swindon Borough, as presented below.

The Regulation 18 evidence base includes the Swindon Local Housing Needs Assessment ("LHNA", 2024) which provides the most up to date assessment of affordable housing need for Swindon Borough. The 2024 LHNA takes account of the updated national definition of affordable housing first introduced by the NPPF 2018 and identifies an **on-going need for 236¹ affordable homes per annum between 2023/24 and 2042/43**, equal to a total need for 4,720 new affordable homes over the proposed 20-year Plan period. In the first year of the assessment period (2023/24), the Council delivered only 62 net affordable homes, leading to shortfall in the delivery of -174 affordable dwellings against identified need. This means that 74% of identified affordable housing needs in Swindon went unmet in 2023/24.

Looking at affordable housing delivery over the adopted Plan period, MHCLG data shows that between 2011/12 and 2023/24 the Council has achieved an average delivery of 98 affordable dwellings per annum (net of Right to Buy sales and additions from acquisitions), equivalent to 11% of the total average number of net housing completions.

¹ Utilising an affordability threshold of 35%.

Comparing affordable housing delivery against identified needs over the current adopted Plan period, delivery has fallen short of identified needs by an annual shortfall of -703 affordable homes since 2011/12, as set out in Figure 2 below.

Figure 2: Net Affordable Housing Delivery in Swindon against identified needs, 2011/12 to 2023/24

Monitoring Year	Additions to AH Stock (Net of RtB)	Local Plan 2026 AH Need (Net)	Annual Shortfall	Cumulative Shortfall	Additions as a %age of Need
2011/12	258	801	-543	-543	32%
2012/13	129	801	-672	-1,215	16%
2013/14	96	801	-705	-1,920	12%
2014/15	-27	801	-828	-2,748	-3%
2015/16	0	801	-801	-3,549	0%
2016/17	54	801	-747	-4,296	7%
2017/18	158	801	-643	-4,939	20%
2018/19	114	801	-687	-5,626	14%
2019/20	164	801	-637	-6,263	20%
2020/21	94	801	-707	-6,970	12%
2021/22	93	801	-708	-7,678	12%
2022/23	75	801	-726	-8,404	9%
2023/24	62	801	-739	-9,143	8%
Total	1,270	10,413		-9,143	
Avg. Pa	98	801		-703	12%

Source: MHCLG Open Data, Statistical Data Returns

Figure 2 shows that since the start of the Swindon Borough Local Plan 2026 period in 2011/12 and 2023/24, net affordable housing completions averaged just 98 net affordable dwellings per annum against a need of 801² net affordable dwellings per annum. **A shortfall of -9,143 affordable dwellings has arisen over the 12-year period, equivalent to an average annual shortfall of -703 affordable dwellings. Only 12% of identified affordable housing need has been met over the Plan period to date.**

The harsh consequences of failing to meet affordable housing needs fall upon real households and unequivocally highlight the importance of meeting affordable housing needs. Some of the main consequences of households being denied a suitable affordable home are as follows:

- A lack of financial security and stability;
- Poor impacts on physical and mental health;
- Decreased social mobility;
- Negative impacts on children's education and development;
- Reduced safety with households forced to share facilities with those engaged in crime, anti-social behaviour or those with substance abuse issues;
- Being housed outside social support networks;
- Having to prioritise paying an unaffordable rent or mortgage over basic human needs such as food (heating or eating); and
- An increasing national housing benefit bill.

² See paragraph 4.121 of the Swindon Local Plan 2026.

Affordability and Market Signals in Swindon Borough

The PPG recognises the importance of giving due consideration to market signals in plan making as part of understanding affordability. The housing need number suggested by household projections (the starting point) should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings. The following market signals indicate an affordability crisis in Swindon:

- Housing Register - on 31 March 2024 there were 4,530 households on the SBC Housing Register.
- Temporary Accommodation - MHCLG statutory homelessness data shows that on 31 March 2024 there were 368 households in SBC in temporary accommodation. Of these households, 230 (63%) were households with children.
- Homelessness - MHCLG statutory homelessness data shows that in the 12 months between 1 April 2023 and 31 March 2024, the Council accepted 98 households in need of homelessness prevention duty³, and a further 200 households in need of relief duty⁴ from the Council.
- Private Rents - Office for National Statistics ("ONS") data (first produced in 2014/15) shows that average (mean) private rents in Swindon stood at £1,048 per calendar month ("pcm") in 2024/25. This represents a 57% increase from 2014/15 where average private rents stood at £669 pcm. ONS data also shows that average (mean) private rents in Swindon have risen by 10% in the past year from £953 in 2023/24 to £1,048 in 2024/25.
- Affordability Ratio - For those seeking a lower quartile priced property (typically considered to be the 'more affordable' segment of the housing market), the ratio of lower quartile house price to incomes in Swindon in 2023 stood at 7.53. Those on lower quartile incomes in Swindon, seeking to purchase a lower quartile priced property, now need to find more than seven times their annual income to do so. This compares to a national lower quartile affordability ratio of 6.77.
- Lower Quartile House Prices - The lower quartile house price in Swindon has risen by 74% over the adopted Local Plan period from £120,500 in 2011/12 to £210,000 in 2024. This compares to a 57% increase across the South West and a national increase of 52% over the same period. It is evident that the lower quartile house price in Swindon has risen at a faster rate than that across the region or on a national basis.

In light of these market signals and the poor past record of affordable housing delivery in Swindon, the Council should look favourably upon opportunities to sustainably deliver new affordable homes in Swindon. Land at Day House Lane presents the Council an opportunity to do so.

Draft Policy Specific Comments

Draft Policy SD3: High Quality Design

Part 5 of the draft Policy requires all residential developments to meet the internal space standards set out in the Nationally Described Space Standards (NDSS). However, there is no clear justification as to why there is a need to require NDSS, which is contrary to the PPG (ID: 56-020-20150327). The PPG requires specific considerations to be taken into account by LPA which includes the need, viability and timing.

There is no evidence presented within the Regulation 18 consultation material that demonstrates including a requirement for all new dwellings to be NDSS is firstly needed and then secondly viable. On that basis, such a requirement is not justified and there should not be a blanket requirement for NDSS in policies going forward.

³ 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 homelessness. The prevention duty applies when a Local Authority is satisfied that an applicant is threatened with homelessness and eligible for assistance.

⁴ 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.

Draft Policy SD8: Historic Environment

It is important that any policies relating to development and existing heritage assets are drafted in a manner to ensure consistency with the requirements of the NPPF.

There is support for the acknowledgement in part 3 of the draft policy that “*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*” (emphasis added). This reflects the requirements of the NPPF which states assets should be conserved “*in a manner appropriate to their significance*” (paragraph 202).

In terms of the level of information to accompany a planning application in close proximity of heritage assets, it is important that the local policy is sufficiently flexible to comply with the NPPF.

Paragraph 207 of the NPPF is clear that “*the level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance*”. This should be included in any emerging policy, so it’s clear the level of information that is needed.

Draft Policy HC1: Housing Tenures and Sizes

Supporting paragraph 6.10 states that “*Of the ~30% affordable housing need, some 77.8% of households would require a Social Rented property rather than an Affordable Rented dwelling.*” However, clarification should be provided that this is not suggesting a tenure split for future schemes, with draft Policy HC1 noting this should be in accordance with the most up to date evidence at the time.

Draft Policy SP6: Climate Stability and the Environment

It is important that any future climate change policies are sufficiently flexible to enable viability to be taken into account and for the most appropriate mitigation measures to come forward that reflect the specific site and scheme context.

Furthermore, climate change policies should be carefully considered against Building Regulations and the Future Homes Standard 2025 to avoid duplication and any potential inconsistencies.

Draft Policy CS1: Carbon Reduction and Sustainable Design in new development, Draft Policy CSE2: Whole Life Carbon Assessments (WLCA) and Draft Policy CSE3: Green Infrastructure in New Developments

Carbon reduction policies are a critical tool in addressing climate change, improving energy efficiency, and ensuring long-term environmental sustainability. However, these do add extra pressures to overall scheme viability, therefore, policies do need to take this into account and ensure flexibility in terms of how schemes incorporate carbon reduction and sustainable design.

Conclusions

The site at Land at Day House Lane is a strong candidate for development; the land is available and suitable for residential use with the required infrastructure. The site has the potential to deliver much-needed housing, in the short to medium term in a sustainable location. It will allow for delivery of housing in one of the more expensive areas of the Borough without the need to rely on complicated strategic sites. The site would be able to deliver a range of types and tenures of homes to meet local need at the time of an application.

Residential development at the site would deliver affordable housing for those who have a local connection. There is a need for housing, particularly affordable homes in Swindon Borough and consequently, the emerging Local Plan should allocate this site for residential development.

We would like to be consulted on further stages of the New Local Plan and other related publications and welcome the opportunity to meet with the Council to discuss the site. We would also like to attend the examination hearing.

Yours faithfully

Amy James BA(Hons) MPlan MRTPI
ASSOCIATE DIRECTOR
For and On Behalf Of
TETLOW KING PLANNING

- Encs. Appendix 1 Site Location Plan
- Appendix 2 Completed Representations Form
- Appendix 3 Vision Document
- Appendix 4 Rolled Over Strategic Sites

Appendix 1

Site Location Plan

A1

Notes:



Richborough

Development Name:
Land off Day House Lane,
SwindonProject Number:
0752Title:
Contract Plan 3Drawn date:
Oct '25Drawn by:
DMScale:
1/1250 @ A1Drawing number:
R-0752-CP-02Revision:
-

Appendix 2

Completed Representations Form

Representation Form

 SWINDON BOROUGH COUNCIL	Swindon Borough Council Local Plan Publication Stage (Regulation 18) Draft Local Plan Representation Form	Ref: (For official use only)
--	---	--

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

For your comments to be taken as a formal submission you are required to state your name and address. In line with the Data Protection Act 2018, Swindon Borough Council will treat and protect your data in accordance with the Act. If you wish to withdraw or amend your personal data, you will need to contact Swindon Borough Council's Planning Policy team either by email

(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
https://www.swindon.gov.uk/directory_record/23261/planning_policy_privacy_notice

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*

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	Ms	Mrs
First Name	Alanna	Amy
Last Name	Mahoney	James
Job Title (where relevant)		Associate Director
Organisation (where relevant)	Richborough	Tetlow King Planning
Address Line 1	C/O Agent	
Line 2		
Line 3		
Line 4		
Post Code		
Telephone Number		
E-mail Address		

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 Other social media Local newspaper (printed) Don't remember

Council social media Local news website Local Radio Council Website

Other (please specify):

Part B – Please use a separate sheet for each representation

Name or Organisation: Amy James, Tetlow King Planning on behalf of Richborough

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

Chapter	4 - Policy SS1 Swindon's Spatial Approach to Growth	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.

Please refer to the accompanying cover letter.

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.

Additional sites in locations outside of the Town Centre, such as Land at Day House Lane, need to be allocated for housing to ensure that the future development of the Borough. This is to ensure that Swindon is able to fully meet local housing needs, including those seeking family housing with private amenity space, which the Town Centre sites can't typically offer.

Please refer to the accompanying cover letter for further details.

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: Amy James, Tetlow King Planning on behalf of Richborough

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

Chapter	1 (paragraphs 1.9 and 1.11)	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.

Please refer to the accompanying cover letter.

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 new Local Plan period should be extended to at least 2045. Please refer to the accompanying cover letter for further details.

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: Amy James, Tetlow King Planning on behalf of Richborough

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

Chapter	6 – Policy SP2 Homes for the Community	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.

Please refer to the accompanying cover letter.

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 overall housing requirement should be increased to at least a minimum of 26,510 dwellings to account for a longer Plan period. Additional sites should also be identified and allocated for housing, including Land at Day House Lane, to ensure the Council is able to deliver the level of growth required to meet local needs.

Please refer to the accompanying cover letter for further details.

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: Amy James, Tetlow King Planning on behalf of Richborough

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

Chapter	<input type="checkbox"/>	Policies Map	<input type="checkbox"/>	Evidence base document e.g. the Sustainability Appraisal	<input type="checkbox"/>	Five Year Housing Land Supply Statement (1 April 2025 to 31 March 2030)	<input type="checkbox"/>
---------	--------------------------	--------------	--------------------------	--	--------------------------	---	--------------------------

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.

Please refer to the accompanying cover letter.

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 Council cannot currently demonstrate a five year supply of deliverable housing sites, therefore, additional sites, including Land at Day House Lane, should be identified and allocated for housing to ensure the Council is able to demonstrate and maintain a five year housing land supply.

Please refer to the accompanying cover letter for further details.

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: Amy James, Tetlow King Planning on behalf of Richborough

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

Chapter	6	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.

Please refer to the accompanying cover letter.

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.

There is no evidence submitted to demonstrate that the Council has met its duty to cooperate. An Action Plan or Statement of Common Ground should be submitted to clearly demonstrate that this duty has been met.

Please refer to the accompanying cover letter for further details.

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: Amy James, Tetlow King Planning on behalf of Richborough

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

Chapter	6 – Policy HC2 Affordable Housing	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.

Please refer to the accompanying cover letter.

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 refer to the accompanying cover letter.

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: Amy James, Tetlow King Planning on behalf of Richborough

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

Chapter	5 – Policy SD3 High Quality Design	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.

Please refer to the accompanying cover letter.

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 refer to the accompanying cover letter.

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: Amy James, Tetlow King Planning on behalf of Richborough

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

Chapter	5 – Policy SD8 Historic Environment	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.

Please refer to the accompanying cover letter.

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 refer to the accompanying cover letter.

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: Amy James, Tetlow King Planning on behalf of Richborough

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

Chapter	6 – Policy HC1 Housing Tenures and Sizes	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.

Please refer to the accompanying cover letter.

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 refer to the accompanying cover letter.

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: Amy James, Tetlow King Planning on behalf of Richborough

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

Chapter	9 – Policy SP6 Climate Stability and the Environment	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.

Please refer to the accompanying cover letter.

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 refer to the accompanying cover letter.

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: Amy James, Tetlow King Planning on behalf of Richborough

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

Chapter	9 – Policy CS1 Carbon Reduction and Sustainable Design	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.

Please refer to the accompanying cover letter.

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 refer to the accompanying cover letter.

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: Amy James, Tetlow King Planning on behalf of Richborough

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

Chapter	9 – Policy CSE2 Whole Life Carbon Assessments	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.

Please refer to the accompanying cover letter.

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 refer to the accompanying cover letter.

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: Amy James, Tetlow King Planning on behalf of Richborough

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

Chapter	9– Policy CSE3 Green Infrastructure in New Developments	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.

Please refer to the accompanying cover letter.

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 refer to the accompanying cover letter.

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.

Appendix 3

Vision Document



Land at Day House Lane,

Swindon



Vision Document

October 2025

A vision to create a high quality, welcoming and locally inspired neighbourhood set in an urban context in very close proximity to key facilities.

Contents

- 1 Introduction
- 2 The Site
- 3 Planning Context
- 4 Technical Considerations
- 5 Illustrative Masterplan & Vision
- 6 Summary: The Case for Allocation

Prepared by

Dean Knight,
Senior Regional Director, South West

[REDACTED]

Jonathan Bloor
Managing Director, Western Division

[REDACTED]

Charlotte Lewis
Group Design Director

[REDACTED]

Haydn Jones
Planning Director

[REDACTED]

This document is designed to read at A3.
The contents of this document are not to be copied or reproduced without the written
consent of Richborough Estates Ltd

www.richborough.co.uk

About Richborough

Richborough is one of the country's leading specialist strategic land promotion businesses founded with the aim of working responsibly and in partnership with landowners, local planning authorities and key local stakeholders.

Richborough's projects are located throughout the country, ranging from residential schemes of around 100 dwellings to large urban extensions, including sites in the Green Belt.

Richborough oversees the entire planning process from start to finish and like to work closely with local communities, local members and planning officers, statutory consultees and other stakeholders to create the most mutually beneficial schemes for all members of the community.

Richborough is seeking to apply this approach to the Site. The proposal is a residential scheme and this Vision Document brings together the initial technical and environmental studies which have been undertaken by Richborough's internal and external consultant team.

Richborough is seeking to apply this approach to the site. The proposal is a residential scheme and this Vision Document brings together the initial technical and environmental studies which have been undertaken by Richborough's internal and external consultant team

The internal Richborough team comprises a blend of chartered industry professionals including planners, surveyors, architects, urban designers, ecologists and engineers. This makes Richborough well equipped to deliver market facing schemes which avoid any unintended costs or delays when identifying a development partner.

Richborough are strong advocates of high-quality urban design and their in-house design function ensures the appropriate approach to character and place making are guiding principles in each scheme promoted.

Richborough believes proper consultation can yield enhanced results. Their philosophy is to engage and consult with stakeholders including parish and town councils, ward councillors, local groups and MPs.

Richborough has worked successfully with the housebuilding community over many years having sold consented sites to the majority of the large national PLC housebuilders and a high number of smaller regional operators.

Richborough's comprehensive approach to the technical and design due diligence of any site promotion is well received by housebuilders as this avoids development delivery delays.



1

Introduction

- 1.1 This Vision Document has been prepared by Richborough to demonstrate the availability, suitability and deliverability of a strategic site at Swindon, Day House Lane ("the site"). The site offers the potential to deliver a high-quality urban extension on the southern edge of Swindon
- 1.2 The strategic site is in two ownerships and represents a logical and appropriate extension to Swindon, with access to a wide range of existing services and facilities. The site can deliver development that meets the highest standards of sustainable design, providing an opportunity to deliver up to 270 high quality family and affordable homes to meet the critical housing needs of Swindon Borough Council, alongside new green infrastructure, including a public open spaces, and significant landscaping and ecological enhancements.

The Vision Document:

- 1.3 This Vision Document has been prepared by Richborough to demonstrate the suitability of the site at Swindon, Day House Lane for residential-led development and to set out the merits of allocating it as a housing development site in the emerging Swindon Local Plan.
- 1.4 The Vision Document should be read alongside Richborough's Regulation 18 Local Plan Issues and Options Consultation ("Issues and Options Consultation") response (submitted alongside this document).
- 1.5 These Representations provide comment on the spatial and strategic options for a new Local Plan and articulate, alongside this Vision Document, the merits of land at Day House Lane - which is available, suitable and achievable to support the future growth of Swindon.



- 1.6 This Development Statement has been prepared in conjunction with a professional design and technical team to demonstrate that the site is deliverable and entirely suitable for a residential-led development. In summary, this document includes:

Site & Context

- a summary of the site in context, including its wider strategic positioning and a description of the site and its surroundings;

Planning Context

- A review of the planning policy context in the adopted and emerging Local Plan along with the national planning policy context;

Technical Considerations

- Analysis of the key technical and environmental considerations that will influence the development of the site and which have informed the preparation of the masterplan;

Illustrative Masterplan & Vision

- Providing the overarching vision and key guiding principles which underpin an illustrative masterplan for the site; and

Deliverability & Benefits

- A summary of the clear case for allocating the site, including the availability, suitability and achievability of the site, and an articulation of the key benefits that the allocation of the site would deliver.

- 1.7 Should any further information be required by the Council, Richborough and the appointed design and technical team would be happy to address any queries or requests. Richborough is fully committed to undertaking further detailed design and technical work to support the delivery of the site as the Local Plan progresses through to Regulation 19 and Examination in Public.



2

The Site

- 2.1 The site comprises approximately 15 hectares (ha) of undeveloped land to the south-east of Swindon, within two land ownerships and under control by Richborough, forming a logical urban extension to the settlement of Swindon that is highly accessible and sustainable, with access to a range of services and facilities.
- 2.2 To the south and west of the site is further open grassland and to the north and east is residential development.

Swindon's Growth Ambitions

- 2.3 *"Housing is an essential element for growth and, with an increasing population, the Borough needs to bring forward new housing to meet the needs of both current and future Swindon residents" (SBC Local Plan 2023-2024, Regulation 18 Consultation Draft 2025, paragraph 6.1).*
- 2.4 The Local Housing Need for Swindon is 1,195 dwellings per annum (Housing Needs Assessment, Overall Housing Need Update Annex, June 2025), which equates to a requirement of 5,977 dwellings over the next five years.
- 2.5 Against this requirement, the Council's latest housing supply position is 4.9 years (1 April 2025) as set out in the Five Year Housing Land Supply Statement (1 April 2025 - 31 March 2030); which falls short of the National Planning Policy Framework (NPPF) requirement to demonstrate a five year supply.
- 2.6 Representations have been submitted providing a more detailed review of the Council's housing land supply position. However, it is clear that additional housing sites are required in order to fully meet the housing needs of Swindon and also allow flexibility should sites in the supply be delayed or not come forward. This will be crucial if Swindon is to achieve its vision for growth. Land at Day House Lane is a deliverable site that could assist with addressing this shortfall and achieving the Borough's growth ambitions.

Land at Day House Lane

- 2.7 The site is not located in the Green Belt; it does not form part of the formal SSSI designation of Coates Water and is not situated within a Conservation Area.
- 2.8 In sustainability terms, the site is located within easy access of a range of local services and facilities including Badbury Park Primary School, Commonhead Park and children's playground, Co-op Foodstore, the Great Western Hospital and the leisure and recreational offerings of Coate Water Country Park. There is a bus stop circa 170m walk from the site offering services to a range of destinations including Swindon Town Centre.
- 2.9 Developing the site for housing would form a logical extension to the Commonhead scheme to the east of Day House Lane.



Technical Considerations

- 2.17 There is an area of flood risk in the northern part of the site, however, a scheme can be suitably designed to ensure this area remains free from built form. This area could offer ecological and landscape enhancements and assist with delivering a Biodiversity Net Gain.
- 2.18 Technical matters relating to access, ecology, landscape and heritage are discussed in greater detail in subsequent sections, demonstrating that the site can be sensitively developed in a manner that respects and is sympathetic to the nearby ecological and heritage assets. In summary, there are no technical considerations that would prevent housing being delivered on this site.
- 2.19 Therefore, this sustainably located and deliverable site, should be allocated for housing in the emerging Local Plan to assist the Borough in addressing its shortfall in meeting local housing needs.



3

Planning Context

Planning History

- 2.10 The site has been subject to planning applications in the past; however, it does not currently have any live planning approvals.
- 2.11 Development proposals for the northern part of the site were co-joined with proposals for the southern part of the site, which also included a much wider land parcel stretching eastwards and proposed a mix of uses including provision of a University Campus and were considered at appeal in 2008 and then subsequently by the Secretary of State in 2009 (as part of a co-joined Call In). Although the co-joined appeals were both dismissed, it is important to note that the surrounding site context was very different back in 2008/2009 than it is now. The site was entirely surrounded by open grass land, albeit for a small farm to the east.
- 2.12 This is now no longer the case as the site is now adjacent to residential development, delivered as part of the Commonhead Swindon Local Plan 2026 allocation. The entire character of that area has now changed through the delivery of housing to the east of the site.



▲ Historic site image 2009



▲ Site image 2025

Planning Context

- 2.13 The current Swindon Local Plan 2026 was adopted in March 2015 covering the period up to 2026. The site is shown to be located outside of the Urban Area Boundary of Swindon and forms part of the Commonhead Allocation (NC2) allocated as "Setting Protection for Coate Water".
- 2.14 Local Plan Policy NC2 set out the requirements for the delivery of the Commonhead Allocation, which included keeping the area between Coate Water and the new development protected from development in order to preserve the setting of the Coate Water Country Park seeking to ensure the function of Day House Lane as a green corridor will be safeguarded.
- 2.15 The Local Plan is now over 10 years old, therefore, is time expired, and given the absence of a five year supply of housing is out of date. Furthermore, as set out above, the Commonhead allocation has been delivered and has changed the character and nature of this area of Swindon.
- 2.16 As part of the emerging Local Plan (Regulation 18), the site is still located outside of the Urban Area Boundary but with no specific allocation.



4

Technical Considerations

4.1 An illustrative masterplan and the design evolution of the site has been underpinned by detailed technical analysis that has considered any site opportunities and constraints. It has demonstrated that a development could be sensitively brought forward that responds to the site characteristics and respects the character of the surrounding area.

4.2 This section sets out the key environmental and technical considerations, and serves as a framework for more detailed design and technical assessment work as the emerging Swindon Local Plan progresses.

Sustainability

4.3 The proposed development is situated within a highly accessible and sustainable location, benefiting from excellent connections to the surrounding area. The site lies within comfortable walking distance of existing bus stops, providing residents with convenient access to regular public transport services. This enables easy travel to nearby local centres and facilities without reliance on the private car, thereby supporting a shift towards more sustainable modes of transport in line with national and local policy objectives.

4.4 In addition, the site is well-served by a range of essential community amenities located within a short walking distance. These include the Co-op Food Store at Badbury Park, approximately 150 metres from the site, offering convenient access to day-to-day shopping needs; the Great Western Hospital, situated around 400 metres away, providing comprehensive healthcare services; and the Badbury Park Library and Community Hub, both located approximately 150 metres from the site, which together offer social, educational, and recreational opportunities for residents.

4.5 Taken together, the proximity of these facilities demonstrates the site's strong alignment with the principles of sustainable development, reducing the need for car travel and supporting the creation of a walkable, well-connected community.

Highways

4.6 The site is located adjacent to Badbury Park Primary School and in close proximity to a Co-Op convenience store, Great Western Hospital, and Coate Water Park. For journeys further afield National Cycle Network can be accessed at the northern end of Day House Lane while bus stops on Homington Avenue provide regular services to Swindon town centre. The site is therefore excellently located in terms of access to sustainable modes of transport.

4.7 The site will be accessed from Day House Lane via a simple priority junction which will meet all relevant standards, while a package of improvements would be made to Day House Lane to ensure safe and suitable access for all users. Additional pedestrian connections will be provided to Badbury Park to ensure direct and convenient access to the facilities mentioned above.

4.8 The impact of the proposed development on the local road network will be comprehensively assessed through a modelling exercise to be agreed with Swindon Borough Council. Any mitigation deemed necessary will be delivered, ensuring no unacceptable impact on the safety or capacity of the local road network.

Ecology

4.9 To inform the promotion of the Site for residential development, Tyler Grange Group Limited have undertaken a high-level review of ecological constraints and opportunities.

4.10 The northern parcel of the Site (ref: s0455) was deemed 'not suitable' within the Swindon Borough Council Strategic Housing and Economic Land Availability Assessment (SHELAA) (September 2025). The SHELAA reaches this assessment as the "Site (is) located outside of a current settlement boundary. Land is lowland fen. Significant concerns regarding heritage and ecology and some concern relating to landscape".

4.11 The northern parcel of the Site has an 'Red' overall RAG in relation to Ecology within the SHELAA, with the notes referring to the site as being lowland fen. Annex 7 within the SHELAA states that for a Site with an 'Red' overall RAG in relation to Ecology "Development (is) likely to cause considerable harm or destruction of ecology and mitigation unlikely."

4.12 Statutory Designations

The Site does not lie within or directly adjacent to any internationally or nationally important sites for nature conservation and no internationally important sites lie within 10km of the Site. However Coate Water Site of Special Scientific Interest (SSSI) lies approximately 210m to the west of the Site, which also incorporates the Coate Water Local Nature Reserve (LNR). The SSSI is designated on account of its assemblage of breeding birds and dragonflies and damselflies (Odonata). Overall it is in a favourable condition, although based on a recent report the Odonata assemblage is in an unfavourable - declining condition due to the decline in the condition of surrounding supporting habitats and meadows. Water quality and more favourable management were indicated as being required, with the main pressure indicated for the site being fishing activities. The SSSI is a Country Park where Swindon Borough Council actively encourages recreation with its range of facilities. It and the land to the north is also highlighted in the Swindon Local Plan Policies Map as a Strategic Green Infrastructure Network, which states that "development shall provide and design green infrastructure to integrate with existing green corridors identified on the Policies Map, to maximise its connections and functions and ensure the sustainable maintenance and management of it".

4.13 Policy NC2 of the Swindon Local Plan, relating to development at Commonhead (an allocated site for development) states that "the area between Coate Water and the new development, as indicated on the Policies Map will be protected from development to preserve the setting to the Coate Water Country Park, and the function of Day House Lane as a green corridor will be safeguarded."

4.14 Habitats and Fauna

Consultation of the Priority Habitat Inventory indicates that while there is Lowland Fen habitat present within 200m, associated with Coate Water, there are no identified priority habitats present within the Site. A walkover of the Site conducted in September 2025 by an experienced botanist indicated that the Site comprises several field parcels comprising a mixture of modified grassland and other neutral grassland. Although the western field parcel within the Site indicates some wet influence, with the presence of some rushes, it did not have indicators of Lowland Fen priority habitat, as indicated

by the SHELAA reference for the Site (s0455). These habitats are common and widespread in the surrounding area and are not fundamental to the functionality of the reasons for designation of the SSSI.

4.15 The habitats of highest importance within the Site are the mature native, in some cases species-rich hedgerows and mature trees, located largely at the field boundaries. Detailed botanical surveys at the appropriate season would be required to inform any future planning application and underpin a Biodiversity Net Gain Assessment.

4.16 The Site has the potential to support protected species including roosting and foraging bats, nesting birds, badgers and reptiles. Detailed surveys will be required to inform any future planning application and help refine development proposals, however with sensitive development design (see below) the presence of such species would not affect the principle of development and impacts could be suitably mitigated.

4.17 Ecological Constraints and Opportunities

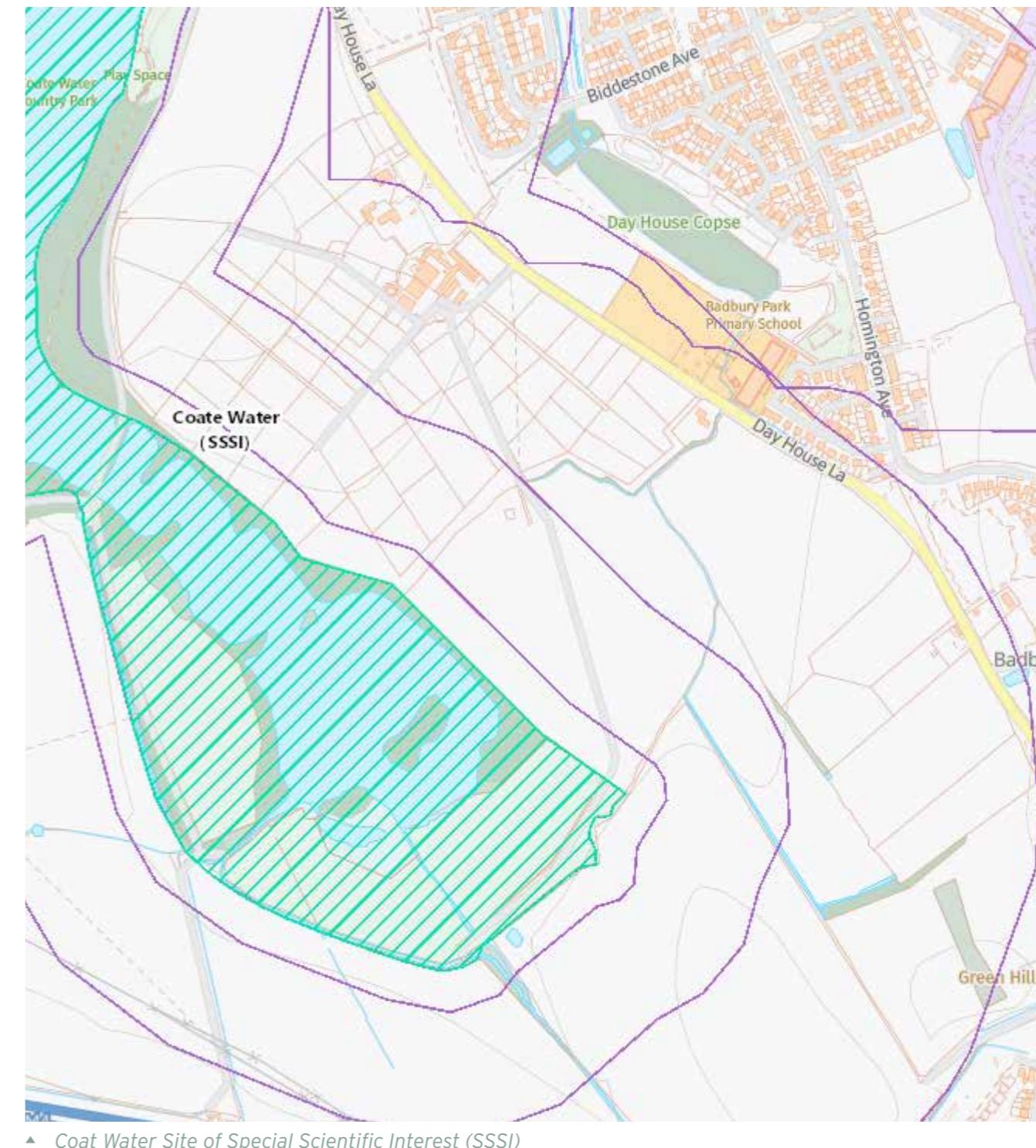
With appropriate, green and blue infrastructure-led design with consideration specifically for potential impacts to the Coate Water SSSI, development of the Site could be targeted whereby appropriate mitigation can be provided with 'considerable harm' avoided and net gains for biodiversity achieved.

4.18 Through incorporation of a buffer to the SSSI within the western portion of the Site, which can provide multi-functional benefits including drainage functions (designed to create quality wetland habitat), habitat enhancements and provide informal recreational space, impacts to the designated site can be avoided. Indeed the Site could provide additional functionality for the assemblages associated with the SSSI through such sensitive design through creation of higher quality wet grassland and wetland habitats, currently unrepresented on the Site.

4.19 This in combination with a sensitive drainage design to avoid any impacts on water quality and quantity and which could indeed provide catchment benefits should also be integrated.

4.20 The features of highest ecological importance, namely trees, hedgerows and areas of higher quality grassland should be retained and protected as far as possible within development, which is echoed within the current indicative masterplan that largely retains these features, where losses are minimised. Any losses required to facilitate site access for example can be compensated through appropriate native tree and hedgerow planting. This will also seek to ensure any protected species populations utilising the site can be adequately retained and protected.

4.21 4.20 On balance, despite the 'Red' RAG rating for Ecology indicated in the SHELAA, through appropriate and sensitive green-blue infrastructure-led development design there is no reason to suspect that there are any issues that would prevent the principle of development and the development could deliver net gains for biodiversity.





Heritage

4.22 There are two adjacent listed buildings in close proximity to the Site; 45, Day House Lane and Badbury Wick Farm Cottage. The proposals should seek to mitigate through the location of the built development area, build heights and additional landscaping. Some degree of intervisibility would need to be considered in respect of potential impacts which the masterplan reflect through design.

4.23 Although a non-designated heritage asset, Badbury Wick House, which lies adjacent to Badbury Wick Cottage would be considered. Whilst it lies with greater intervening tree cover, there is still probable intervisibility with the site so this may reinforce any existing need for strengthening the Days House Lane frontage with additional planting.

4.24 Whilst the setting of Day House Lane is more of a landscape consideration, it is worth noting that presently when viewing south-west from the lane over the Site, one views a broader rurality towards Coate Water Country Park and adjacent agricultural land. The new development already seen to the north-east of the listed buildings along Homington Avenue is quite visually exposed viewing from Days House Lane and it would be beneficial to soften the immediate landscape around Days Lane and the listed buildings through sensitive landscaping within the Site. This would help to minimise impact to the significance of the heritage assets through development within their setting.

4.25 The main archaeological feature of interest is a Scheduled stone circle a short distance to the north-west as well as a Scheduled bowl barrow a little further away in this direction. The presence of these features of interest in the vicinity means that an archaeological desk-based assessment would be required, with any planning application submission, to identify the potential for other archaeological features of interest within and around the Site, including undertaking a detailed Historic Environment Record search, and to consider potential impacts to their significance.

4.26 A ridge and furrow feature is not considered as a constraint for the site however this archaeological feature is still shown to be retained in the current masterplan.

4.27 In summary, an Archaeological Desk Based Assessment will be required as will a Built Heritage Statement as part of any application submission.



Landscape

4.28 To inform the promotion of the Site, Tyler Grange Group Limited have undertaken a high-level review in respect to landscape and visual matters. A summary of this analysis and the findings are set out below:

4.29 The northern parcel of the Site (ref: s0455) was deemed 'not suitable' within the Swindon Borough Council Strategic Housing and Economic Land Availability Assessment (SHELAA) (September 2025). The SHELAA reaches this assessment as the "Site (is) located outside of a current settlement boundary. Land is lowland fen. Significant concerns regarding heritage and ecology and some concern relating to landscape".

4.30 The northern parcel of the Site has an 'Amber' overall RAG in relation to Landscape within the SHELAA. Table 7 within the SHELAA states that for a Site with an 'Amber' overall RAG in relation to Landscape "Development (is) likely to affect landscape character, food production or the quality of open space - impact could be minimised but not fully avoided."



Designations

4.31 The Site does not lie within any national or local landscape designations, however 'North Wessex Downs' National Landscape (NL) lies approximately 380m to the east and 460m south of the Site. The Site is therefore within its setting. Paragraph 189 of the NPPF states "development within their (National Parks, the Broads and National Landscapes) setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas". This can be achieved by demonstrating how proposals respond to the the 'AONB Policies' and 'special qualities' of the NL within the North Wessex Downs Area of Outstanding Natural Beauty Management Plan 2019-2024.

4.32 "LA06: Ensure that all development in or affecting the setting of the AONB conserves and enhances the character, qualities and heritage of the North Wessex Downs landscape."

4.33 Coate Water Country Park lies approximately 120m to the west of the Site. The country park is also covered by Policy EN1: Green Infrastructure Network of the Swindon Borough Local Plan 2026 which sets out that "development shall provide and design green infrastructure to integrate with existing green corridors identified on the Policies Map, to maximise its connections and functions and ensure the sustainable maintenance and management of it".

4.34 Public Right of Way (PRoW) 'CS6' abuts the western boundary of the southern parcel of the Site which connects with the wider PRoW network including the Sarsen Way Long Distance Route which passes through Coate Water Country Park to the west of the Site.

4.35 Several TPO's are present across the Site concentrated within the hedgerow boundaries, albeit some are present within the northern parcel along what appear to be historic boundaries.



Landscape Character

4.36 The Site lies within the 'Mid Vale Ridge' Landscape Character Area (LCA) within the Swindon Landscape Character Assessment (August 2025). The LCA is described as a "predominantly agricultural with a mixed arable and pastoral landscape" and "a settled landscape" with a "limited sense of remoteness and isolation due to close proximity to Swindon". The Site is reflective of these characteristics as pastoral fields adjacent to existing residential built form.

4.37 The 'Mid Vale Ridge' LCA landscape guidelines of relevance to the Site include:

4.38 Where opportunities arise, provide for additional tree planting that maintains the scale and dispersed pattern of existing woodlands;

4.39 Provide planting to contain the development within a discrete area, reflecting the undulations of the landscape;



Views / Visual Amenity

4.40 Due to the built form of Swindon to the north and west, paired with the scattered woodland to the west including within Coate Water Country Park, views afforded towards the Site will be limited to the PRoW and local roads immediately surrounding the Site, and the rising land to the south and east within North Wessex Downs National Landscape. Where views towards the Site are afforded, the proposed development would be viewed as a small extension to the existing residential built form to the north, east and south of the Site. The retention and enhancement of green infrastructure throughout the proposed development will assist in embedding the proposed residential built form into the existing settled context.

4.41 Photo from PRoW 'LN18' within North Wessex Downs NL to the south-east of the Site (drive by visit):



▲ South east image of the site



▲ South east image of the site zoomed in



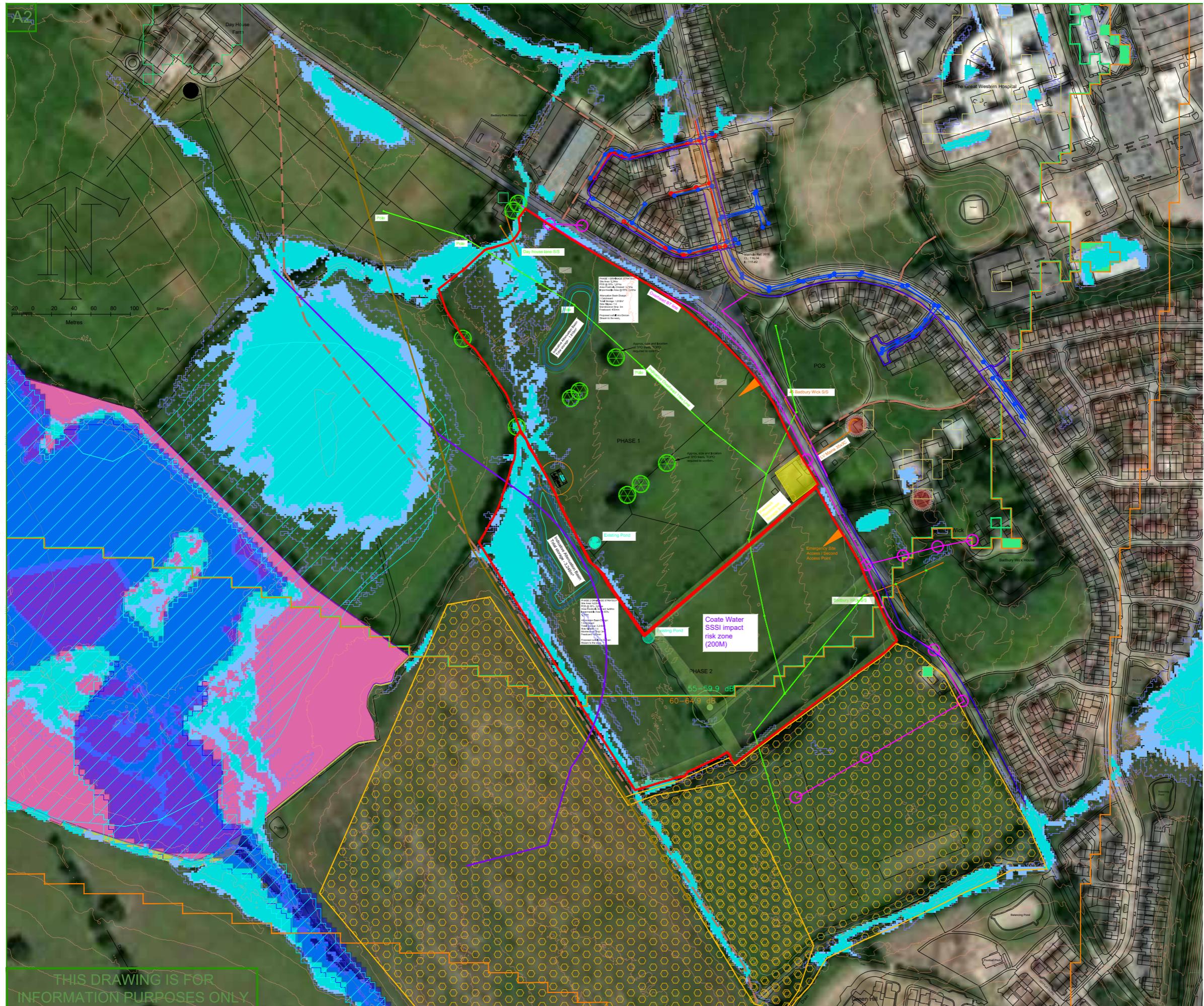
Recommendations

- 4.42 To aid the assimilation of built proposals into the existing landscape context, we recommend the proposed measures within the masterplan of the scheme as follows:
- 4.43 The western portion of the Site should be enhanced as open space and green infrastructure provision to provide links to the existing Public Right of Way (PRoW) 'CS6' which abuts the western boundary. Enhancement of green infrastructure here can also provide connections to Coate Water Country Park and the Strategic Green Infrastructure Network (Policy EN1).
- 4.44 In line with the 'Mid Vale Ridge' LCA landscape guidelines, native tree planting, especially within the west of the Site where the existing well treed hedgerow along the western boundary can be enhanced.
- 4.45 The retention and enhancement of green infrastructure including hedgerows and trees, notably the TPOs, throughout the proposed development will assist in embedding the proposed residential built form into the existing settled context. Street tree planting will further break up built form.
- 4.46 Built form should be concentrated to the east of the Site adjacent to the neighbouring residential built form. Higher density development should be concentrated in the centre of this built form with decreased density to the edges, especially the western edge, abutting the proposed green infrastructure provision.

Summary

- 4.47 In summary, the site is considered to be wholly suitable for development. It provides a deliverable opportunity to accommodate the required housing growth in Swindon at a scale that can deliver a range of wider benefits to the local community. This is set out in more detail within the next section.





Key:

- Site Boundary - Phase 1 20.19 Acres
- Site Boundary - Phase 2 6.90 Acres
- Flood zone 3
- Flood zone 2
- Surface Water Flood Risk 1 in 30
- Surface Water Flood Risk 1 in 100
- Surface Water Flood Risk 1 in 1000
- Existing OH Power Lines
- Existing LP Gas Mains
- Existing Overhead BT Pole
- Existing Foul Drainage
- Existing Surface Water Sewer
- Surface Water Rising Main
- Existing foul rising main
- Existing Water Mains
- Road Noise 55-59.9 dB
- Road Noise 60-64.9 dB
- PROW
- Coate Water SSSI impact risk zone (200M)
- Existing Pond
- Indicative Persimmon Storage Area
- Potential attenuation pond
- Existing Tree Preservation Order
- Existing mature trees and hedgerows
- Historic Landfill
- Coate Water Nature Reserve
- Existing Highway Extents
- Section 38 Agreement Extents
- Listed Building

◀ Technical constraints plan



5

Vision & Illustrative Masterplan

- 5.1 **The proposed site layout has been carefully informed by a detailed understanding of the site's known opportunities and constraints, all of which have been integrated into the design approach even at this early stage.**
- 5.2 **Public open space provision, including both typology and size, has been guided by the Local Planning Authority's 2015 Local Plan Open Space Standards to ensure appropriate levels of amenity and recreation for future residents. The residential development mix has been informed by the findings of the LPA's 2017 Strategic Housing Market Assessment (SHMA), assuming an average density of approximately 35 dwellings per hectare, with no apartments proposed in order to reflect the prevailing local character.**
- 5.3 **The site benefits from substantial existing boundary vegetation, including mature hedgerows and trees, which provide effective visual screening. These features are to be retained and incorporated into areas of adopted public open space, ensuring their long-term protection and contribution to the site's landscape framework.**
- 5.4 **Development along the southern boundary, adjacent to the M4 and A419 corridors, has been designed with outward-facing frontages and rear gardens positioned to the south. This layout not only promotes an attractive edge to the development but also assists in mitigating potential noise impacts from the adjoining transport infrastructure.**
- 5.5 **The site lies within the setting of Coate Water Country Park and is recognised as part of its wider landscape context under Policy NC2 relating to the adjacent Commonhead development. The proposed layout therefore respects and enhances this relationship through sensitive design and the careful positioning of built form.**
A designed development setback has also been incorporated to protect the setting of the nearby listed building, particularly in more visually exposed areas
- 5.6 **Sustainable Drainage System features have been designed as elongated, naturalistic elements that follow the grain of the landscape, complementing the site's historic ridge and furrow pattern and contributing to local biodiversity and visual interest.**



Legend

Site A
20.20 Acres
8.17 Hectares

Site B
16.85 Acres
6.82 Hectares

Medium density

Lower density

Residential

Site A:
11.52 Acres
4.66 Hectares
164no. dwellings @ 35dph

Site B:
6.51 Acres
2.63 Hectares
91no. dwellings @ 35dph

Public open space

Site A:
8.69 Acres
3.51 Hectares

Site B:
10.35 Acres
4.19 Hectares

Existing landscape

Sustainable drainage

New landscape

Primary street

Secondary street

Public footpath

Development entrance

Emergency access

Pedestrian and cycle connectivity opportunities

Listed building

Summary: The Case for Allocation

6.1 There is a clear and compelling case to allocate the site in the emerging Local Plan. The site forms a logical extension to the settlement of Swindon and is within two ownerships, under the control of Richborough. The site has the potential to accommodate a sensitive landscape-led development that will assist in meeting the identified housing and community infrastructure needs of the Borough.

6.2 This section provides a summary of the reasons why the site should be considered for allocation by Swindon Borough Council in all potential spatial strategy growth scenarios.

Meeting Housing Need

6.3 The NPPF notes that the overall aim is for an area to meet its identified housing need, including with an appropriate mix of housing types for the local community. It goes on to say that planning policies should identify a supply of specific, deliverable housing sites for five years. The Council cannot currently demonstrate a five year supply of housing and concerns are also raised through the accompanying representations regarding the longer term supply of sites currently identified by the Council in the emerging Local Plan.

6.4 Therefore, additional sites, such as land at Day House Lane, are needed in order for the Council to achieve its growth ambitions and meet the needs of the local community over the next five years and over the long term Plan period.

A Logical Urban Extension

6.5 The wider context of the site has changed over the last 16 years through the delivery of the Commonhead scheme to the east. The area is now characterised by residential development. Developing land off Day House Lane for housing would form a logical extension to the existing residential development.



A Wholly Deliverable Site

6.8 The NPPF seeks to ensure that deliverable sites are provided in appropriate locations to meet housing needs and support economic growth. To be considered deliverable, sites should be available, suitable and achievable and should be available to be brought forward within a realistic timeframe once the Local Plan is adopted. In this context, the site is:

- **Available** - Richborough has control over the entire site, which is in a single landownership, and is hugely experienced with an extensive track record in delivering a diverse range of high-quality new housing developments across the UK.
- **Suitable** - the site is entirely suitable for a residential development for the following reasons:
 - It is sustainably located with excellent public transport links in its immediate vicinity.
 - There are a range of local community services and facilities within the local area.
 - There are no technical constraints that would prevent the proposed development from coming forward for development.
 - It is adjacent to an established residential area and would form the next logical spatial phase of settlement expansion in Winsford.
- **Achievable** - The illustrative masterplan demonstrates how the site responds to its physical characteristics, technical considerations and surrounding context by providing a sensitive landscape-led, deliverable masterplan. An assessment of the site constraints illustrates that delivery of the entire site is achievable, and a professional team of technical experts has been retained to support the detailed design of the site moving forward. Richborough has reviewed the economic viability of the scheme and can confirm the scheme is viable and intends to deliver a policy compliant level of affordable housing.

Key Benefits

6.9 The delivery of the site will provide significant benefits to the Borough and its residents. These include:

Economic Benefits

6.10 The proposals will create significant investment to the local and regional economy during the construction phase through direct spending associated with the build period, the creation of jobs, and the subsequent secondary spending in the local economy. The key economic benefits include:

- Generating investment during the construction phase of development through construction cost, Full Time Equivalent ("FTE") construction jobs and an increase in GVA.
- Providing long term occupation / operational benefits including new resident expenditure, attracting new and high earning residents to Winsford, generating flow on and supported jobs and, overall, generating increased economic output in the Borough.

- Generating significant revenue for the Local Authority, with a development of new homes generating revenue in Council Tax revenue, New Homes Bonus and through Section 106 Contributions.
- Underpinning employment growth across Winsford by providing the type, quality and spatial distribution of homes in the region that will allow it to capitalise on its key strengths.

Social Benefits

6.11 The delivery of the site will have clear social benefits for existing and future residents, in terms of providing better choice, improving access to amenities and meeting a variety of identified housing needs. The key social benefits include:

- Delivering high quality market homes to meet the needs of the Borough's existing and future employees.
- Providing viable and deliverable affordable homes to address the Borough's affordability crisis and support the housing of key workers and first time buyers.

Environmental Benefits

6.12 The development of the site has the potential to significantly uplift the biodiversity, accessibility and overall enjoyment and environmental value of the site. Key environmental benefits include:

- The site as a minimum, meet the 10% net gain requirement with the potential to exceed this.
- The provision of multi-functional green infrastructure and open space that will benefit existing residents and create new green corridors through the site.
- The protection and enhancement of existing features of the site that add value, including mature trees, hedgerows and woodland.





Appendix 4

Rolled Over Strategic Sites

Appendix 4 – Assessment of Rolled Over Strategic Sites from the Adopted Local Plan

Site	Emerging Local Plan draft housing numbers	2025 SHELAA Assessment	Adopted Local Plan 2026 (Adopted 2015)	Comments
Great Stall West (Reg 18 Ref 18-013 and SHLAA Ref S0001)	20	Rated amber on landscape, ecology, regen priorities and location. Potential to provide strong commercial or residential frontage.	Forms part of adopted Local Plan allocation NC3 New Eastern Villages – within area identified for a mix of residential and employment uses.	The site was allocated 10 years ago and has not yet come forward. Furthermore, it is identified as having potential for residential and commercial uses, therefore, there is no guarantee it will come forward for housing.
Great Stall West (Reg 18 Ref 18-013 and SHLAA Ref S0440)	680	Rated amber on landscape, archaeology, ecology, regen properties and location.	Forms part of adopted Local Plan allocation NC3 New Eastern Villages – within area identified for a mix of residential and employment uses.	The site was allocated 10 years ago and has not yet come forward.
Upper Lotmead (Reg 18 Ref 18-014 and SHLAA Ref S0565)	850	Rated amber on heritage, landscape, ecology, regen properties and location. Concerns are raised in relation to archaeology and it's noted there could be some flood risk.	Forms part of adopted Local Plan allocation NC3 New Eastern Villages – within area with anticipated housing delivery in 2019/20 – 2023/24.	The site was allocated 10 years ago and has not yet come forward.
Green Land (Reg 18 Ref 18-041 and SHLAA Ref S0371)	275	Rated red on landscape and amber on archaeology, ecology, regen properties and location. Site includes an area of non-designated archaeology and also some flood risk.	Forms part of adopted Local Plan allocation NC3 New Eastern Villages – within area with anticipated housing delivery in 2019/20 – 2023/24 and 2021/22 – 2025/26.	The site was allocated 10 years ago and has not yet come forward. The 2025 SHLAA notes significant concerns with landscaping, therefore,

Site	Emerging Local Plan draft housing numbers	2025 SHELAA Assessment	Adopted Local Plan 2026 (Adopted 2015)	Comments
		<p>There is a current lack of facilities/services, but the adjacent site is identified for considerable mixed use development.</p> <p>Significant concerns related to landscape – in particular with regards to the direction set out within the NEV Green Infrastructure SPD.</p>		<p>quantum of development proposed could be optimistic.</p>
Redlands Village (Reg 18 Ref 18-043)	450	<p>Not in the SHLAA.</p>	<p>Forms part of adopted Local Plan allocation NC3 New Eastern Villages – within area with anticipated housing delivery in 2021/22 – 2025/26.</p>	<p>It is noted as a pipeline commitment and rolled over allocation.</p> <p>However, the site was allocated 10 years ago and has not yet come forward.</p> <p>This part of the NEV is below the above site, therefore, whilst there is no requirement for the allocation to come forward in a specific sequence, developing this site first could be seen as piecemeal development isolated from the rest of the NEV. Therefore, if there are further delays/concerns with the land to the north then this could impact upon the deliverability of this site.</p>

Site	Emerging Local Plan draft housing numbers	2025 SHELA Assessment	Adopted Local Plan 2026 (Adopted 2015)	Comments
Wichelstowe (Reg 18 Ref 18-018)	1,620	Not in the SHLAA.	<p>Forms part of adopted Local Plan allocation NC1.</p> <p>Outline planning permission for 4,500 dwellings, mixed use development granted in May 2005 and construction started in spring 2007. Reasoned justification from Local Plan "although development is underway economic conditions have delayed delivery and created uncertainty over the implementation of the existing consent. Even though Wichelstowe has outline planning permission, future uncertainty over the implementation of the scheme in its current format necessitates its allocation in this Local Plan".</p>	<p>Despite having a consent, in 2007, by the time of the adoption of the Local Plan in 2015 there was already uncertainty as to whether the full scheme would be delivered. Ten years have now passed since concern was raised about the deliverability of the consented scheme and there are still over a quarter of the scheme left to build out.</p> <p>There are clear uncertainties relating to the overall deliverability of the remainder of this site.</p>



Respondent No: 489

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title Mr

Q2. First Name Gareth

Q3. Last Name Johns

Q4. Job Title (where relevant) Associate Director

Q5. Organisation (where relevant) Pro Vision on behalf of Hills (UK) Ltd

[REDACTED]

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

SBC admin note: Please see attached response.

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

not answered

SWINDON LOCAL PLAN 2023-2043

Regulation 18 Consultation Draft

Prepared by Pro Vision on behalf of Hills (UK) Ltd.

October 2025

SWINDON LOCAL PLAN 2023-2043

PROJECT NO. 2495

PREPARED BY:

GARETH JOHNS MRTPI

ASSOCIATE DIRECTOR

CHECKED BY:

JAMES ILES MRTPI

DIRECTOR

DATE:

OCTOBER 2025

PRO VISION



COPYRIGHT: The contents of this document must not be copied or reproduced in whole or in part without the prior written consent of Pro Vision.

CONTENTS

1.0	Introduction	1
2.0	The Spatial Strategy	2
3.0	Housing Need and Supply	5
4.0	Former Brickworks, Day House Lane, Swindon	9

1.0 Introduction

1.1 This Statement is made on behalf of Hills (UK) Ltd. ('Hills') in relation to their land at the 'Former Brickworks, Day House Lane, Swindon'. It is in response to the draft Swindon Local Plan Regulation 18 Consultation Draft (hereafter referred to as 'the draft Plan').

1.2 Hills has established a reputation for building high quality homes in desirable locations throughout the region. In recent years, Hills has worked in partnership with the Council and local stakeholders to bring forward the Former Brickworks site at Wroughton for new homes.

1.3 Hill's land at Commonhead has previously been promoted for development through the Council's Call for Sites exercise. The site is identified in the Strategic Housing and Economic Land Availability Assessment (SHELAA) 2025 as Site Ref: s0020. It lies immediately adjoining Badbury Park, on the south-eastern edge of Swindon, and is well related to the existing urban area. The site has the potential to deliver approximately 70 new homes, including affordable housing, public open space, and landscaping.

1.4 This representation is supported by the following documents:

- Site Location Plan prepared by Pro Vision;
- Illustrative Framework Masterplan prepared by Pro Vision;
- Landscape and Visual Impact Assessment prepared by WH Landscape;
- Transport Technical Note prepared by Cole Easdon; and
- Ecological Technical Note prepared by Pro Vision Ecology.

1.5 In assessing whether a Local Plan is sound, reference needs to be made to the National Planning Policy Framework ('the Framework') and the tests of soundness set out at paragraph 36.

1.6 Accordingly, this Statement reviews the draft Plan against those tests of soundness and identifies how the Plan could be amended to facilitate sustainable housing delivery across the plan period, including through the re-evaluation of the Former Brickworks site for allocation.

2.0 The Spatial Strategy

- 2.1 Chapter 4 and Policy SS1 of the draft Plan sets out the proposed spatial strategy for growth across the Borough. The strategy provides a strong focus on accommodating housing within Swindon's town centre and existing urban areas, together with the Strategic Growth Locations. Beyond these areas, limited growth will be acceptable within the rural villages and hamlets.
- 2.2 Whilst Hills support the general approach to the spatial strategy - including prioritising the use of brownfield land in accordance with the Framework - the strategy lacks flexibility and realism.
- 2.3 The draft Plan relies heavily on housing delivery from Swindon's town centre and the established Strategic Growth Locations to meet the Borough's housing requirement over the plan period. However, the draft Plan fails to demonstrate that this approach will be effective in delivering the required level of housing.
- 2.4 In practice, both town centre and Strategic Growth Location sites present a high level of delivery risk.
- 2.5 Town centre housing delivery is typically constrained by viability and funding challenges, piecemeal land ownership, complex site assembly and, in some cases, the need for remediation. It is also dependent upon the upgrade and expansion of infrastructure - such as healthcare and education - to support an increased residential population. These factors can cause significant lead-in delays and, in some cases, prevent development from coming forward altogether.
- 2.6 Likewise, the Strategic Growth Locations such as the New Eastern Villages (NEV), Kingsdown, and Wichelstowe are large complex, infrastructure-dependent sites requiring major infrastructure investment before housing can be delivered at scale. Delivery across these allocations has already proven slower than anticipated, a fact reflected in the Council's failure to maintain a five-year housing land supply.
- 2.7 These factors significantly undermine confidence that the proposed spatial strategy can maintain a consistent and reliable housing supply to meet its housing needs throughout the plan period. The onus is on the Council to provide further evidence that the supply and delivery rates from these sources are realistic and achievable.

The Interim Sustainability Appraisal (June 2025)

- 2.8 The Interim Sustainability Appraisal (SA) (June 2025) identifies three 'reasonable alternative' growth scenarios, each designed to accommodate Swindon's Local Housing Need (LHN) under the Government's Standard Method. However, these alternatives are narrowly defined and do not adequately explore how new housing could be distributed spatially across the Borough. As a result, the SA has not tested a genuinely reasonable range of growth options.
- 2.9 There is insufficient analysis of the relative merits and risks of different patterns of growth - particularly scenarios involving increased delivery away from the town centre and the established Strategic Growth Locations, such as NEV. The Interim SA itself acknowledges that further work is required to scrutinise the assumed housing supply and to strengthen the delivery assumptions underpinning these key sources of growth.
- 2.10 Small and medium-sized sites located on the urban edge - such as the Former Brickworks, Day House Lane - offer clear advantages in terms of early delivery and are typically free from any strategic infrastructure needs. These sites can deliver homes within the first five years of the plan period and provide a more flexible and resilient housing supply in accordance with paragraphs 72 and 73 of the Framework. Despite this, they appear to have been overlooked by the Council in both the SA and the draft Plan.
- 2.11 Accordingly, further consideration must be given to a 'reasonable alternative' that reduces reliance on the town centre and Strategic Growth Locations and incorporates a broader distribution of housing, including through deliverable and sustainable small and medium-sized sites on the edge of Swindon.

Conclusion

- 2.12 In conclusion, the spatial strategy as currently drafted is not sufficiently justified or effective to deliver the Borough's housing needs over the plan period.
- 2.13 It relies heavily on large scale strategic sites and town centre regeneration, where delivery is uncertain and further evidence is required to justify the anticipated supply and delivery rates assumed in the draft Plan.

2.14 The Interim SA also fails to properly test 'reasonable alternatives' for the spatial distribution of housing.

2.15 A sound and balanced approach would require the Council to consider broadening the spatial distribution of growth, incorporating sustainable, modest edge of Swindon sites - such as the Former Brickworks, Day House Lane (SHELAA ref: s0020) - which are sustainable, deliverable and capable of early delivery. Inclusion of such sites would materially strengthen the Plan's resilience, secure early housing supply, and ensure that the Plan is effective in accordance with paragraphs 72 and 73 of the Framework.

3.0 Housing Need and Supply

Housing Requirement

- 3.1 Chapter 6 and Policy SP2 identifies a need for 1,205 dwellings per annum (dpa), or 24,100 dwellings over the plan period under the Government's Standard Method.
- 3.2 While the identification of Local Housing Need (LHN) using the Government's Standard Method provides an appropriate starting point, this figure should be treated as a minimum, not a ceiling.
- 3.3 The Council confirms that the draft Plan incorporates a buffer of just over 1,000 dwellings (c.4%), excluding any contribution from potential windfall sites.

Duty to Co-operate

- 3.4 The Council is under a 'duty to co-operate' to engage constructively, actively and on an ongoing basis with neighbouring authorities (e.g Wiltshire, Vale of White Horse and Cotswolds) on strategic cross-boundary matters, including unmet housing need.
- 3.5 The Interim SA advises that there may be potential unmet housing need arising from adjoining authorities within the sub-region, particularly from Wiltshire Council and Cotswold District Council. Indeed, the Council will be aware that the committee papers relating to the Cotswold District Council Local Plan Regulation 18 consultation have recently been published and demonstrate that the Council's preferred housing growth scenario, proposes only 79% of the Government's Standard Method target, suggesting that a significant element of unmet need may need to be addressed elsewhere.
- 3.6 To address this likely significant future unmet housing need, the Plan needs to consider a strategy to meet this need through planning for a higher level of housing or by introducing greater flexibility within the Plan's supply.
- 3.7 The above reinforces the importance of a clear and transparent evidence base demonstrating how such issues have been considered and addressed through ongoing engagement as the Plan progresses. Without such evidence, the Plan risks failing to meet the requirements of Section 33A of the Planning and Compulsory Purchase Act 2004 and being found unsound at examination.

The Interim Sustainability Appraisal (June 2025)

- 3.8 Notwithstanding our comments on the spatial distribution above, the interim SA, at paragraph 5.5.6, also simply dismisses the possibility of testing a higher growth scenario (i.e. LHN +12%) without providing any clear evidence or analysis to support this decision.
- 3.9 It is considered that the Council should have tested a wider range of higher-growth scenarios - for example, 15 - 20% above LHN - alongside a broader spatial distribution of development to properly justify the preferred strategy. A modest uplift would bring tangible benefits: increasing affordable housing delivery, supporting economic growth and inward investment, and improving infrastructure viability, particularly for sustainable transport and water management. The failure to test such 'reasonable alternatives' represents a significant shortcoming in the SA process and weakens the justification for the Plan's overall strategy.

Housing Supply

- 3.10 The draft Plan confirms that there were 831 net dwelling completions in 2023/24, and a further 12,767 dwellings are identified as existing commitments. This leaves a residual requirement for approximately 10,500 new permissions to be granted over the remainder of the plan period.

Existing Commitments

- 3.11 The draft Plan appears to make no allowance for non-implementation rates within the existing commitments. Experience from Swindon and comparable authorities shows that a proportion of planning permissions will not be implemented within the plan period - indeed, the Council's Five-Year Land Supply Report includes a non-implementation rate of 4.8%.
- 3.12 Accordingly, a non-implementation rate of around 5% would be realistic when applied to the current committed supply. This would equate to a reduction of around 639 dwellings. The effect of such a discount would be to erode the already modest 4% 'supply buffer' relied upon in the draft Plan.
- 3.13 By failing to make any allowance for non-implementation, the Council overstates the deliverable supply, presenting an optimistic trajectory unsupported by past delivery evidence. This creates a serious risk that the Plan will be unable to demonstrate a rolling five-year housing land supply or meet its overall housing requirement over the plan period.

Town Centre Regeneration and Strategic Growth Locations

- 3.14 As set out in Section 2, both town centre regeneration and Strategic Growth Location sites entail significant delivery risk. The Council itself recognises that further work is required to verify capacity and phasing assumptions, without which the trajectory cannot be regarded as robust.
- 3.15 To minimise this risk, it would be prudent and consistent with the Framework (paragraph 73) to ensure that the Plan also identifies a range of small and medium-sized sites that are deliverable within the early years of the Plan. Such sites provide essential flexibility and resilience within the housing supply, enabling early delivery and supporting the Council in meeting a five-year land supply upon adoption. The Former Brickworks, Day House Lane (SHELAA ref: s0020) represents a clear example of a sustainable site that could contribute to housing delivery in the early part of the plan period, complementing (rather than competing with) the larger strategic allocations and town centre sites.

Supply Buffer

- 3.16 The Council should be concerned that limiting the housing supply to a buffer of only 4% (excluding windfalls) will significantly restrict boosting the delivery of new homes. Such a limited contingency provides little flexibility to respond to under-delivery and risks further exacerbating Swindon's affordability pressures, leading to rising house prices and increasing barriers for residents and workers seeking suitable housing.
- 3.17 Moreover, the supply buffer is already eroded by compounding risks - the lack of a non-implementation rate, potential unmet need from neighbouring authorities, and lack of delivery from large strategic and town centre sites. The Plan therefore lacks the flexibility required to adapt to changing market or delivery conditions.
- 3.18 Accordingly, Hills consider that an appropriate and robust 'supply buffer' would require an uplift to the housing requirement in the order of 10-20%. This would provide the necessary headroom to maintain a rolling five-year housing land supply, meet the overall housing requirement in full, and ensure the Plan remains positively prepared and effective.

Conclusion

3.19 The draft Plan's housing strategy is not justified, positively prepared or effective. The housing strategy relies heavily on large-scale strategic allocations and town centre regeneration sites, without adequate contingency or flexibility to respond to delivery risks. The evidence base fails to demonstrate that the housing requirement is robust, that unmet needs from neighbouring authorities are being properly addressed, or that the housing trajectory is realistically achievable over the plan period.

3.20 To render the Plan sound, the Council should, in accordance with national policy, look at opportunities to allocate a greater number of available sites - particularly small and medium-sized sites - to provide choice, variety, and deliverability across the Borough. Many such sites, including the Former Brickworks, Day House Lane, Swindon (SHELAA ref: s0020), have been unjustifiably overlooked despite being suitable, available, and deliverable (see further details at Section 4).

3.21 Alternatively, the Plan could incorporate a flexible permissive policy allowing appropriate edge of Swindon development where specific triggers arise - such as a five-year supply shortfall, slippage in strategic allocations, or failure of town centre housing delivery - provided proposals comply with other relevant policies.

3.22 A further option would be to assign 'reserve sites', including sustainable edge of Swindon sites such as the Former Brickworks, Day House Lane, Swindon (SHELAA ref: s0020), to be released through monitoring triggers if delivery falls below the trajectory.

4.0 Former Brickworks, Day House Lane, Swindon

- 4.1 In the context of our concerns about the vulnerability of the draft Plan and the proposed housing strategy, the obvious remedy is to allocate additional new homes from the available sites in the SHELAA, which should be treated as a live document and source of available land. Against that background, we turn to our client's land at the Former Brickworks, Day House Lane, Swindon (SHELAA Site Ref: s0020), which has been unjustifiably overlooked in the formulation of the draft Plan.
- 4.2 The Council's SHELAA (2025) concludes that the Site is "*not suitable*" for residential development, citing its location "*outside of a current settlement boundary*" and identifying "*significant concerns regarding ecology and some concern relating to heritage and landscape*". We respectfully but firmly disagree with this conclusion, which is not supported by robust or up-to-date evidence and does not properly reflect the site's characteristics, context, or deliverability.
- 4.3 An Illustrative Framework Masterplan accompanying these representations, demonstrates how the development of the site could accommodate around 70 dwellings, including affordable housing, public open space, and landscaping.
- 4.4 The Former Brickworks site is immediately adjacent to the existing urban area, forming a logical and sustainable extension to Badbury Park. Development of this land would round off the existing residential edge in a manner that respects landscape character and avoids unnecessary sprawl. The site benefits from excellent proximity to services and employment, including the Great Western Hospital, Badbury Park Primary School, and existing bus routes. Future residents would be able to walk or cycle to key facilities, supporting modal shift and aligning with the draft Plan's sustainable transport objectives.
- 4.5 This direction of growth at Commonhead has already been positively established and endorsed by the Council through the delivery of new homes and associated infrastructure at Badbury Park, thereby confirming the area as a logical and sustainable location for further expansion.

SHELAA Site Assessment

Ecology

4.6 The Council's SHELAA identifies "significant ecology concerns" as the primary reason for discounting the site. However, this conclusion is unsupported by any substantive evidence.

4.7 Since 2018, Hills has commissioned a comprehensive suite of ecological surveys, and these have been updated during 2024 and 2025 to ensure that the baseline information reflects the most up-to-date position. The accompanying Ecological Technical Note (Pro Vision Ecology, 2025) confirms the following key findings:

- i. No statutory or non-statutory designated sites lie within the site boundary;
- ii. Bat activity surveys recorded only low levels of use, and the proposed layout retains key commuting and foraging corridors;
- iii. Dormouse surveys have recorded no evidence of presence to date, nevertheless the design retains habitat connectivity;
- iv. Reptile surveys confirm no reptiles are present on site;
- v. Great Crested Newt surveys confirm absence from surrounding waterbodies, and while the site falls within an "amber zone", the species is considered absent from the site; and
- vi. The proposed development can deliver 10% biodiversity net gain, consistent with the statutory requirement under the Environment Act 2021.

4.8 Accordingly, the ecological position is clear: there are no insurmountable constraints, and ecological interests can be fully safeguarded and enhanced through design and mitigation. The SHELAA conclusion of 'unsuitability' on ecological grounds is therefore plainly incorrect and the assessment must be updated to reflect this survey evidence.

Landscape

4.9 It is welcomed that the Council has removed the previous policy designation relating to the 'protection of Coate Water', which had no clear evidential basis. Our previous representations to the earlier Local Plan and Call for Sites demonstrated that development of the Former

Brickworks site would have no adverse physical, visual, or environmental effect on the setting of Coate Water or its wider landscape context.

- 4.10 A Landscape and Visual Impact Assessment (LVIA), prepared by WH Landscape, accompanies these representations.
- 4.11 The LVIA concludes that the site makes no distinct contribution to the wider landscape character, being defined instead by its transitional, urban-fringe qualities. It identifies that the site is visually and physically contained by strong boundary vegetation and lies within the prevailing built-form context established by the Badbury Park urban extension to the east and south. As such, the site reads as a logical and well-integrated continuation of the existing settlement edge, rather than an intrusion into open countryside.
- 4.12 The LVIA therefore supports the view that development of the site would not give rise to unacceptable landscape or visual effects, and that it presents a sustainable and visually appropriate location for growth at the south-eastern edge of Swindon.

Heritage

- 4.13 The SHELAA raises some concerns in respect of heritage; however, the site lies a clear distance from the nearest designated assets, namely the Grade II Listed Badbury Wick Farm Cottage and 45 Day House Lane. The proposed development would not extend the built form any further east than the existing Badbury Park scheme, thereby maintaining the established settlement edge. The Illustrative Framework Masterplan demonstrates that the layout can be sensitively designed, with built development focused on the western portion of the site and a substantial area of open space and structural landscaping retained to the east. Accordingly, there is no reasonable basis to conclude that the proposal would give rise to harm to the setting or significance of any nearby heritage assets.

Access

- 4.14 Since the submission of the Call for Sites, Hills has undertaken further detailed work to confirm the suitability of access arrangements, including the commissioning of a Pre-Application Highways Appraisal by Cole Easdon Consultants and constructive discussions with the Council's Highways Team.
- 4.15 As a result, it is now considered that a suitable access can be provided from Day House Lane. The Appraisal from Cole Easdon demonstrates that Day House Lane operates within modest

traffic volumes and below national speed limits, with recorded 85th percentile speeds typically between 20-36mph. Importantly, data obtained confirms no recorded personal injury accidents within the study area over the most recent five-year period. This evidences a strong safety record and the absence of any existing conflict between vehicles, pedestrians, cyclists or equestrians.

- 4.16 Furthermore, the proposed access via Day House Lane avoids the need to route traffic via Homington Avenue, where it is understood that local residents have raised significant concerns regarding on-street parking and traffic.
- 4.17 The proposed site access demonstrates that the necessary visibility splays (27m to the south and 24m to the north) are readily achievable within land under Hill's control or within adopted highway. Provision is also made for a 2m footway and tactile paving, ensuring inclusive pedestrian access and compliance with accessibility standards.
- 4.18 The Highways Appraisal concludes that the development would not result in a severe residual cumulative impact on the operation of the local network, nor would an access from Day House Lane give rise to any unacceptable highway safety effects.
- 4.19 In summary, the evidence before the authority confirms that the proposed access strategy from Day House Lane is technically robust, policy-compliant and entirely deliverable. The Council's Highways Team has positively confirmed the suitability of an access from Day House Lane, and no technical or safety objections have been identified. As such, there are no transport or highway safety grounds upon which the Council could reasonably preclude development.

Conclusion

- 4.20 There are no insurmountable physical, environmental, or technical constraints that would prevent the delivery of the 'Former Brickworks, Day House Lane, Swindon' for residential development. The evidence demonstrates that the Site is suitable, available, and achievable, and capable of delivering approximately 70 new homes, including a meaningful proportion of affordable housing, together with substantial public open space, new landscaping, and ecological enhancements sufficient to achieve BNG (see Illustrative Framework Masterplan). The proposal therefore represents a sustainable, deliverable, and valuable opportunity to contribute positively towards meeting Swindon's identified housing need in a timely and responsible manner, consistent with the objectives of the Framework.

4.21 Accordingly, it is our firm view that the Council should correct the evidence base and reconsider and allocate the site within the emerging Swindon Local Plan as a highly sustainable and deliverable location for growth, capable of contributing positively to the Borough's housing supply and supporting the continued, plan-led expansion of the Commonhead area. This site presents a logical opportunity to accommodate an additional medium-sized housing allocation in the Plan, which would accord in principle with national policy which encourages an appropriate mix of sites.



Respondent No: 490

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title Miss

Q2. First Name Hyacinth

Q3. Last Name Cabiles

Q4. Job Title (where relevant) Town Planner

Q5. Organisation (where relevant) NHS Property Services

[REDACTED]

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

SBC admin note: Please see attached response.

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

not answered

Swindon Borough Council
Planning Policy Team
5th Floor
Civic Offices, Euclid Street
Swindon SN1 2JH
SwindonLocalPlan2043@swindon.gov.uk

NHS Property Services Ltd
[REDACTED]
[REDACTED]
[REDACTED]
www.property.nhs.uk

13 October 2025

BY EMAIL ONLY

RE: Consultation on Swindon Local Plan – Publication Stage (Regulation 18)

Thank you for the opportunity to comment on the above document. The following representations are submitted by NHS Property Services (NHSPS).

NHS Property Services

NHS Property Services (NHSPS) manages, maintains and improves NHS properties and facilities, working in partnership with NHS organisations to create safe, efficient, sustainable and modern healthcare environments. We partner with local NHS Integrated Care Boards (ICBs) and wider NHS organisations to help them plan and manage their estates to unlock greater value and ensure every patient can get the care they need in the right place and space for them. NHSPS is part of the NHS and is wholly owned by the Department of Health and Social Care (DHSC) – all surplus funds are reinvested directly into the NHS to tackle the biggest estates challenges including space utilisation, quality, and access with the core objective to enable excellent patient care.

General Comments on Health Infrastructure to Support Housing Growth

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

Residential developments often have very significant impacts in terms of the need for additional primary healthcare provision for future residents. Given health infrastructure's strategic importance to supporting housing growth and sustainable development, it should be considered at the forefront of priorities for infrastructure delivery. The ability to continually review the healthcare estate, optimise land use, and deliver health services from modern facilities is crucial. The health estate must be supported to develop, modernise, or be protected in line with integrated NHS strategies. Planning policies should enable the delivery of essential healthcare infrastructure and be prepared in consultation with the NHS to ensure they help deliver estate transformation.

Detailed Comments on Draft Local Plan Policies

Our detailed comments set out below are focused on ensuring that the needs of the health service are embedded into the Local Plan in a way that supports sustainable growth. When developing any additional guidance to support implementation of Local Plan policies relevant to health, for example in relation to developer contributions or health impact assessments, we would request the Council engage the NHS in the process as early as possible.

Representation Form

 SWINDON BOROUGH COUNCIL	<p>Swindon Borough Council Local Plan</p> <p>Publication Stage (Regulation 18) Draft Local Plan Representation Form</p>	<p>Ref: (For official use only)</p>
--	--	---

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

For your comments to be taken as a formal submission you are required to state your name and address. In line with the Data Protection Act 2018, Swindon Borough Council will treat and protect your data in accordance with the Act. If you wish to withdraw or amend your personal data, you will need to contact Swindon Borough Council's Planning Policy team either by email (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 https://www.swindon.gov.uk/directory_record/23261/planning_policy_privacy_notice

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.*

Title	Miss	Agent's Details (if applicable)
First Name	Hyacynth	
Last Name	Cabiles	
Job Title (where relevant)	Town Planner	
Organisation (where relevant)	NHS Property Services	
Address Line 1	[REDACTED]	
Line 2	[REDACTED]	
Line 3	[REDACTED]	
Line 4	[REDACTED]	
Post Code	[REDACTED]	
Telephone Number	[REDACTED]	
E-mail Address	[REDACTED]	

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 Other social media Local newspaper (printed) Don't remember

Council social
media

Local news
website

Local Radio Council Website

Other (please specify):

Part B – Please use a separate sheet for each representation

Name or Organisation: NHSPS

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

Chapter	6 – Policy HC2: Affordable Housing	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.

In undertaking further work on local housing needs, we suggest the Council consider the need for affordable housing for NHS staff and those employed by other health and care providers in the local authority area. The sustainability of the NHS is largely dependent on the recruitment and retention of its workforce. Most NHS staff need to be anchored at a specific workplace or within a specific geography to carry out their role. When staff cannot afford to rent or purchase suitable accommodation within reasonable proximity to their workplace, this has an impact on the ability of the NHS to recruit and retain staff.

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

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 recommend that the Council:

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

Name or Organisation: NHSPS

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

Chapter	10 – Policy SP7: Healthy Living	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.

Draft Policy SP7 sets out the Council's commitment to making sure that new developments promote healthier lives and help reduce health inequalities through the built and natural environment. NHSPS support the inclusion of a standalone health policy that supports healthy lives. There is a well-established connection between planning and health, and the planning system has an important role in creating healthy communities. The planning system is critical not only to the provision of improved health services and infrastructure by enabling health providers to meet changing healthcare needs, but also to addressing the wider determinants of health.

Identifying and addressing the health requirements of existing and new development is a critical way of ensuring the promoting healthy and safe communities. In accordance with the NPPF, these requirements should be based on identified needs in the joint strategic needs assessment and support delivery of relevant health strategies, such as the health and wellbeing board's joint local health and wellbeing strategy and the integrated care board's infrastructure plan. On this basis, we welcome/ recommend the inclusion of a comprehensive policy on healthy places in the Local Plan, and encourage the Council to engage with the NHS on this matter ahead of the Regulation 19 document being prepared.

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.

Specific policy requirements to build for healthy places should include the following which are priorities for the health system and clearly cross-referenced to other policies with appropriate level of further details in the Supporting Text, and councils should be encouraged to add/ supplement other general health determinants:

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

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

Name or Organisation: NHSPS

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

Chapter	10 – Policy HL1: Health Impact Assessment	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 use of health impact assessment is a useful tool to ensure planning applicants and the Local Planning Authority have the right information to make sound planning decisions in promoting healthy and safe communities.

NHSPS supports the requirement for Health Impact Assessment to focus on major residential and commercial developments with potential for significant health impacts, and welcome the requirement threshold for proposals over 100 units. NHSPS are concerned, however with the inclusion of healthcare facilities which will be subject to the HIA requirement, particularly in the absence of justification or an indication of the specific scale of development. These development types can be generally considered to be developments that meet or are supported by local need and will likely have a positive impact as community infrastructure. Including this public service infrastructure within the HIA threshold will likely place unnecessary financial cost in undertaking a HIA, including on the NHS when bringing forward health facilities.

As drafted, the policy is also unclear about the benefits of undertaking a HIA beyond presenting an analysis for the Council to undertake further assessment. In line with emerging good practice from other adopted local plan policies on HIA, the Policy can be more effective if reworded to require planning applicants to clearly demonstrate how the HIA analysis has informed the development proposal thereby ensuring health impacts are already addressed in the submitted application, and further mitigation to be considered in planning conditions or obligations.

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

Care. Where the HIA includes assessing healthcare needs, such guidance should be done with advice from NHS Property Services.

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

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.

Proposed Modification to Draft Policy HL1:

“2. Development proposals will be supported where it can be demonstrated that they have been informed by the analysis of a Health Impact Assessment. A Health Impact Assessment is required to be submitted as part of the planning application for major development proposals of over 100 units, and ~~developments which contain~~ any of the following uses *which may be expected to have health* impacts:

- a. Education facilities
- ~~b. Health facilities~~
- c. Leisure or community facilities
- a. ~~d.~~ Hot food takeaways/hot food outlets within 400 metres of where young people congregate, including primary and secondary schools
- b. ~~e.~~ New betting shops, gaming arcades, casinos and amusement arcades
- c. ~~f.~~ Public houses or retail units where the off-sales of alcohol can be reasonably expected”

...

“4. The level of detail should be proportionate to the scale of the development and agreed with the relevant case officer. *The Council will provide further HIA guidance for planning applicants to comply with the requirements of this Policy.*”

Name or Organisation: NHSPS

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

Chapter	10 – Policy HL5: Community Infrastructure	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.

Draft Policy HL5 focuses on the provision of new community facilities and redevelopment of existing community facilities. This includes the protection of existing community facilities, which would require demonstration of the criterion under Point 4. NHSPS supports the provision of sufficient, quality community facilities but does not consider the proposed policy approach to be effective in its current form. Where healthcare facilities are included within the Local's Plan definition of community facilities, policies aimed at preventing the loss or change of use of community facilities and assets can potentially have a harmful impact on the NHS's ability to ensure the delivery of essential facilities and services for the community.

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

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

As currently drafted, the level and type of demonstration required under the criterion listed within Point 4 of Policy HL5 is unclear. In interpreting the policy as currently drafted, it could be interpreted as requiring demonstration of either of the points under (a.) to (d.) alongside demonstration of either of the points under (e.) to (f.).

Where it can be demonstrated that health facilities are surplus to requirements or will be changed as part of wider NHS estate reorganisation and service transformation programmes, it should be accepted that a facility is neither needed nor viable for its current use and sufficiently satisfy the requirements within the criterion under Point 4, and policies within the Local Plan should support the principle of alternative uses for NHS sites with no requirement for retention of a community facility use on the land or submission of onerous information. To ensure the Plan is positively prepared and effective, NHSPS are seeking the following modification (*shown in red italics*) to Draft Policy HL5 to ensure the principle of alternative uses for NHS land and property will be fully supported:

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.

Proposed Modification to Draft Policy HL5, Point 4:

“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 demand for the community facility, demonstrated by genuine marketing evidence for a period of at least one year; *or*
- e) *The healthcare facility is formally declared surplus to operational healthcare requirements of the NHS or identified as part of a published estates strategy or service transformation plan; or*
- f)-e) The community facility is no longer economically viable for the established use; or
- g)-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
- h)-g) The community facility cannot be secured or sustained through the partial redevelopment of the site.”

Or in supporting paragraphs:

Where healthcare facilities are formally declared surplus to the operational healthcare requirements of the NHS or identified as surplus as part of a published estates

strategy or service transformation plan, the requirements listed under Part 4 (a-g) of the policy will not apply.

Part B – Please use a separate sheet for each representation

Name or Organisation: NHSPS

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

Chapter	12 – Policy D1: Developer Contributions	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.

Draft Policy D1 sets out the overarching policy for ensuring development makes a positive contribution to sustainable growth through the delivery of appropriate infrastructure in a timely manner. This is also reflected in draft Policy H5 in relation to community infrastructure, within which health infrastructure falls under. Health infrastructure should be clearly identified in the Local Plan as essential infrastructure. NHSPS welcomes the inclusion of health infrastructure in the priority list for developer contributions in draft Policy D1, with an expectation that development proposals will make provision to meet the cost of healthcare infrastructure made necessary by the development.

In areas of significant housing growth, appropriate funding must be consistently leveraged through developer contributions for health and care services to mitigate the direct impact of growing demand from new housing. Additionally, the significant cumulative impact of smaller housing growth and the need for mitigation must also be considered by the Plan. Given health infrastructure's strategic importance to supporting housing growth and sustainable development, it should always be considered at the forefront of priorities for infrastructure delivery.

We also emphasise the importance of effective implementation mechanisms so that healthcare infrastructure is delivered alongside new development, especially for primary healthcare services as these are the most directly impacted by population growth associated with new development. The NHS, Council and other partners must work together to forecast the health infrastructure and related delivery costs required to support the projected growth and development across the Local Plan area. NHSPS recommend that the Local Plan have a specific section in the document (including in the Policy D1's supporting paragraphs) that sets out the process to determine the

appropriate form of developer contributions to health infrastructure. This would ensure that the assessment of existing healthcare infrastructure is robust, and that mitigation options secured align with NHS requirements.

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

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 Local Plan should emphasise that the NHS and its partners will need to work with the Council in the formulation of appropriate mitigation measures. NHSPS recommends that the Council engage with the relevant Integrated Care Board (ICB) to add further detail within the Local Plan regarding the process for determining the appropriate form of contribution towards the provision of healthcare infrastructure where this is justified. As a starting point, we suggest the following process:

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

General Comments on Evidence Base relating to Healthcare Infrastructure

The provision of adequate healthcare infrastructure is in our view critical to the delivery of sustainable development. We recommend the Council continue to engage with the NHS, particularly the ICB, on an on-going basis as part of preparing the Infrastructure Delivery Plan (IDP). A sound IDP must include sufficient detail to provide clarity around the healthcare infrastructure required to support growth, and to ensure that both planning obligations and the capital allocation processes for the CIL effectively support and result in capital funding towards delivery of the required infrastructure.

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

Conclusion

NHSPS thank Swindon Borough Council for the opportunity to comment on the Local Plan. We trust our comments will be taken into consideration, and we look forward to reviewing future iterations of the Plan. Should you have any queries or require any further information, please do not hesitate to contact me.

NHSPS would be grateful to be kept informed of the progression of the Local Plan and any future consultations via our dedicated email address, [REDACTED]

Yours faithfully,

Hyacinth Cabilis
Town Planner
E: [REDACTED]

For and on behalf of NHS Property Services Ltd



Respondent No: 491

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title Dr

Q2. First Name Carolyn

Q3. Last Name Francis

Q4. Job Title (where relevant) Councillor

Q5. Organisation (where relevant) Bourton Parish Council

[REDACTED]

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

Bourton Parish Council is pleased to see that the Swindon Borough Council Local Plan 2024-2043 includes an Area of Non-Coalescence (Policy CSE7 Landscape and Areas of Non-Coalescence) to provide a buffer between our Parish and the New Eastern Villages (NEV). The Area of Non-Coalescence shown on the Draft Local Plan Policies Map South East generally follows the floodplain of the River Cole from west to east. This area would not be suitable for development due to the fluvial and groundwater flood risk and zoning it for rural land use is the most sensible approach. Notwithstanding the above, Bourton Parish Council would like to see the Area of Non-Coalescence extended to better protect the NEV from flooding and protect fully the western side of the village of Bourton from urban 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.

We recommend that the Area of Non-Coalescence is extended northwards to fill the area between the proposed housing in 18-040, the A240 and the administrative boundary between Swindon Borough Council and the Vale of the White Horse Council. Bourton Parish Council considers that this is necessary to establish the completeness and integrity of the non-coalescence area to the north east and protect fully the western side of the village of Bourton from urban development. We also consider that the Area of Non-Coalescence should be extended southwards to the boundary of the North Wessex Downs National Landscape. All of this area is low-lying agricultural land at risk of flooding. The extension of the Area of Non-Coalescence would also capture the floodplains of the Liden Brook and Lenta Brook to the south which join the River Cole near Bourton. We also recommend that the Area of Non-Coalescence is continued between housing allocations 18-041 and 18-043 and along the southern boundary of 18-042 in order to preserve the open countryside and prevent future coalescence of these areas. We note that Appendix 4 Monitoring Framework has a Key Performance Indicator (KPI) of zero dwellings to be built within the Areas of Non-Coalescence, which we welcome. Policy CSE7 Landscape and Areas of Non-Coalescence does allow small scale proposals for development, which we feel could be interpreted to allow some housing development. However, in the case of the Area of Non-Coalescence on the Policies Map South East, we emphasise that any such development would be unsuitable due to the flood risk and there should be a clear presumption against new housing in this area. Appendix 1 Site Allocations indicates a total number of 6,165 dwellings in the Policies Map for Swindon South East (18-014, 18-040, 18-041, 18-042, and 18-043). It is clear from the Flood Risk Assessment (see Figures 009D and 012D) that the flood risk on the River Cole is high and the modelled flood extents for even relatively small events of 1:20 years extend along channels and through these housing allocation areas. We recommend that the Areas of Non-Coalescence are also extended through these housing allocations to prevent unsuitable development in the floodplain.



Respondent No: 492

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Carolyn

Q3. Last Name Francis

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

The Level 1 Strategic Flood Risk Assessment states that the modelling for the River Cole is in the process of being updated (see paragraph 14.1.4). Paragraph 14.1.5 states “A planning solution to flood risk management should be sought wherever possible, steering vulnerable development away from areas affected by flooding in accordance with the Sequential Test.” The Site Screening Assessment in Appendix D identified Lotmead and Lower Lotmead as high risk from surface water and groundwater flooding. We agree with the recommendation in paragraph 14.1.3 that “Key strategic areas of development, or significant zones of flood risk, should be considered as part of a Level 2 SFRA to further assess the suitability of sites at a detailed level.”

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.

Bourton Parish Council recommends that a Level 2 SFRA is undertaken for the proposed housing allocations shown in the Policy Map Swindon East South prior to deciding any planning applications for these sites.



Respondent No: 493

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Carolyn

Q3. Last Name Francis

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

The construction of a further 9,373 dwellings over the plan period (6,165 from the NEV and 3,208 at South Marston) will inevitably increase traffic flows on the A420, onto the A419 and into Swindon itself. In addition, there would also be the cumulative effect of traffic resulting from extensive house-building in Shrivenham and other towns along the A420 towards Oxford. The Local Plan offers little by way of encouraging drivers off the road or improving the highway network. The Local Plan acknowledges that many car journeys are for travel to and from work, more so in outlying and rural areas (paragraph 8.10). The extensive proposed housing on the east side of Swindon is one such area that will generate traffic from people travelling to and from work given the lack of employment opportunities in the area and lack of a public transport offering. Policy ST4 Transport Assessments, Transport Statements and Travel Plans paragraph 3 states that "Proposals for development which will likely create significant transport and related environmental impacts (in accordance with Department for Transport guidance) will be required to submit a Transport Assessment, and where relevant a Travel Plan". Bourton Parish Council recommends against allowing developers bringing forward sites in a piecemeal fashion and thereby avoiding the requirement to comply with this policy – a practice known as 'salami-slicing'. Any Transport Assessment needs to include the cumulative effect of other developments in the area, including developments along the A420 into the neighbouring administrative Council. Policy ST2 Improving Public Transport paragraph 2 specifically mentions "Installation of mobility hubs or park and ride infrastructure and strategic interchange junctions – Junction 16 M4 and A420 corridor through New Eastern Villages." No further information is provided on the proposals for a park and ride. The only improvements mentioned on the A420 are listed in Appendix 5 as improvements for Gable Cross roundabout (linking South Marsden and Sainsburys) and the Police Station access, but these will do nothing to alleviate the traffic increases along the A420 caused by extensive house building over the next two decades. Policy SGL02 New Eastern Villages (NEV) makes no mention of private or public transport provision.

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.

Bourton Parish Council recommends against allowing developers bringing forward sites in a piecemeal fashion and thereby avoiding the requirement to comply with Policy ST4 to undertake a Transport Assessment and Travel Plan – a practice known as 'salami-slicing'. Any Transport Assessment needs to include the cumulative effect of other developments in the area, including developments along the A420 into the neighbouring administrative Council.



Respondent No: 494

[REDACTED]

Q1. Title not answered

Q2. First Name Carolyn

Q3. Last Name Francis

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

Policy CSE7 Landscape and Areas of Non-Coalescence quite rightly seeks to protect the dark skies of the North Wessex Downs National Landscape. However, protecting dark skies is not simply a matter of lighting design within the National Landscape, it is also a matter of setting lighting design standards for new build and policies around replacement of old lighting with new to reduce skyglow and glare. Bourton Parish Council encourages Swindon Borough Council to include controls on lighting design for the NEV, for highway improvements, and more generally in urban Swindon to minimise light intrusion in the countryside.

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.

Bourton Parish Council encourages Swindon Borough Council to include controls on lighting design for the NEV, for highway improvements, and more generally in urban Swindon to minimise light intrusion in the countryside.



Respondent No: 495

[REDACTED]

Q1. Title Mr

Q2. First Name William

Q3. Last Name Cole

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

Para 2. 'Bustling and thriving' is meaningless in considering the contribution of a development application. Would suggest amending to 'cohesive', 'pro-growth', 'modern' or 'forward-looking'. You have two paragraphs labelled 3. I am supportive of the second which resists piecemeal development where there is wider regen potential, which in turn relates to my point about cohesion above. Para 5. Tall buildings need a bit more direction than just general support subject to minimum standards no? Could you not consider allocating certain sites as priority for tall building dev/regen where they are closer to the retail core, North Star, or along station road and would also be resisted within the setting of heritage assets? Feels this needs more direction to head off speculative apps. Para 6. 'supportive of the redevelopment of car parks...' Into what? This lacks clarity, does this suggest full demolition and replacement or turning them into Peckhamplex?

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 para 2 above.



Respondent No: 496

[REDACTED]

Q1. Title Mr
Q2. First Name William
Q3. Last Name Cole
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 also see attached response. Para 1. The plan should promote high levels of densification in the central area with a mix of uses (office/retail at ground, resi above) to encourage more economic and social activity to have a crowding-in effect and discourage anti-social behaviour. But more than this, the policy should state previously developed sites or those with existing development in prime urban locations that do not currently make most efficient use of space MUST have its footprint redesigned, including demolition of built form that is not protected (via listing etc) to allow the most efficient use of space. The North Star House redevelopment (see below), at one of the most centrally located spots in Swindon, is a catastrophically bad planning decision that should not have been allowed to happen. The retention of the previous office building with a huge car park for conversion to resi, while so close to the town centre is not a sustainable planning strategy. It is a very poor use of space and doesn't align with an 'Effective use of land' policy. Retrofit can be useful but the local plan needs to push for demolition and rebuild instances like this to avoid allowing hundreds of car parking spaces for a development less than 100 metres from a National Rail station. Also on Para 1, 'whilst being sympathetic to the surrounding environment' I hope only refers to sympathetic to heritage, green space, and transport infrastructure. This should be clearer. You are missing para 3(a). [Image]

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. Development proposals should make effective use of land through optimising density (including through the use of layout and design), whilst being sympathetic to the surrounding environment. [In key central locations, this should prioritise/allow for demolition and rebuild of non-protected structures with the layout does not optimise] OR 2. Proposals for employment uses (and residential uses in central locations) should demonstrate how they have sought to intensify floorspace capacity, [including through full redevelopment of sites where the layout of existing non-designated structures does not make an effective use of land].

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	CHAPTER 5: Policy SD1: Effective Use of Land	Policies Map	Evidence base document e.g. the Sustainability Appraisal
---------	---	--------------	--

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

4. COMMENTS

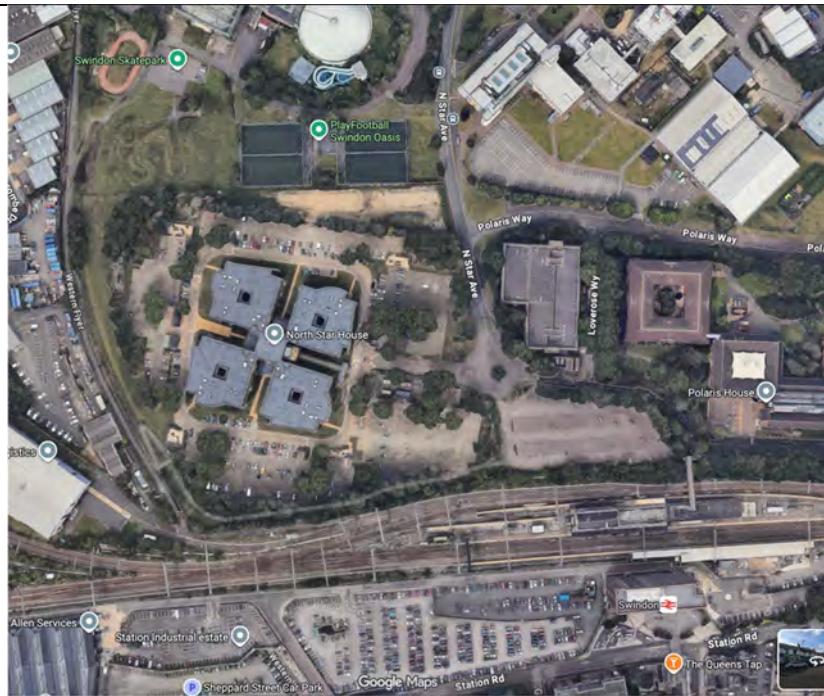
Please set out your comments below. Please be as precise as possible.

Para 1. The plan should promote high levels of densification in the central area with a mix of uses (office/retail at ground, resi above) to encourage more economic and social activity to have a crowding-in effect and discourage anti-social behaviour.

But more than this, the policy should state previously developed sites or those with existing development in prime urban locations that do not currently make most efficient use of space MUST have its footprint redesigned, including demolition of built form that is not protected (via listing etc) to allow the most efficient use of space. The North Star House redevelopment (see below), at one of the most centrally located spots in Swindon, is a catastrophically bad planning decision that should not have been allowed to happen. The retention of the previous office building with a huge car park for conversion to resi, while so close to the town centre is not a sustainable planning strategy. It is a very poor use of space and doesn't align with an 'Effective use of land' policy. Retrofit can be useful but the local plan needs to push for demolition and rebuild instances like this to avoiding allowing hundreds of car parking spaces for a development less than 100 metres from a National Rail station.

Also on Para 1, 'whilst being sympathetic to the surrounding environment' I hope only refers to sympathetic to heritage, green space, and transport infrastructure. This should be clearer.

You are missing para 3(a).



(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.

1. Development proposals should make effective use of land through optimising density (including through the use of layout and design), whilst being sympathetic to the surrounding environment. **In key central locations, this should prioritise/allow for demolition and rebuild of non-protected structures with the layout does not optimise**

OR

2. Proposals for employment uses (and residential uses in central locations) should demonstrate how they have sought to intensify floorspace capacity, **including through full redevelopment of sites where the layout of existing non-designated structures does not make an effective use of land.**

(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: 497

[REDACTED]
[REDACTED]
[REDACTED]

Q1. Title Mr

Q2. First Name William

Q3. Last Name Cole

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

Para 5. under Rail services and Infrastructure – Swindon should be far far more ambitious on rail transport and preserve its ability to expand rail for the future. The plan should safeguard or look to prevent development via Article 4 direction of several more sites including: - A significant slither of land at Swindon Station to the north of Platform 1, wide enough to form a potential platform 0 in future and a step-free northern access point to the railway station. - A connection path for the Stroud line past Moredon Bridge to the Cricklade Heritage railway - The disused elements of the railway behind the BMW plant all the way up to Ruskin Ave. - Land at the New Eastern Villages for a rail link towards 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: 498

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title Mr

Q2. First Name William

Q3. Last Name Cole

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

The draft site allocation 18-019 for 500+ homes should not be allowed. 1. The supporting evidence in the SHELAA for this allocation states that it is unsuitable, and would have significant landscape impacts for the two main parcels of land. I'm not sure why its included when it has basically all amber RAG ratings except landscape which is red. 2. Separately, the site is developed would have significant negative impacts on transport. The 3 parcels of 500+ homes total would cumulatively have a significant adverse effect on transport for nearby Tadpole Garden Village and more crucially for Oakhurst Way. Swindon has a track record of very poor public transport offerings, and given the council's financial position and lack of high density no-car development to make bus routes viable that is unlikely to change. Allocation 18-019 would therefore be predominantly car dependent no matter the 'aspirations' of the council. But there are already huge queues of traffic onto and from Oakhurst Way/Thamesdown Drive during school drop offs and commuting, and due to the lack of other options this allocation would funnel more cars down Oakhurst Way at peak times. Oakhurst way cannot be expanded due to adjacent housing and open green space designation. Connecting the allocation to the A419 would likely create a rat run to Thamesdown Dr via Oakhurst Way to avoid the Groundwell Estate area. This allocation would therefore be unsustainable and have significant knock-on effects for other parts of Swindon as a result of transport. The site allocation would have to be changed to prevent connectivity with Thamesdown Drive via Oakhurst Way except for public transport methods of travel, otherwise it would have severe adverse effects on the road 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.

The site allocation boundary should be changed to prevent connectivity with Thamesdown Drive via Oakhurst Way for private vehicles. A route for public transport (bus-only lane) could be allocated separately.



Respondent No: 499

1000

[REDACTED]

Q1. Title not answered

Q2. First Name **Carrie**

Q3. Last Name Starbuck

Q4. Job Title (where relevant) Director of Nature Recovery

Q5. Organisation (where relevant) Wiltshire Wildlife Trust

The figure consists of a 10x10 grid of black bars. The bars are arranged in two main clusters. A larger cluster of 10 bars is located in the top-left quadrant, with bars of varying widths. A smaller cluster of 5 bars is located in the bottom-right quadrant, also with bars of varying widths. The bars are black with thin white outlines, set against a white background.

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

WWT response to Swindon Borough Council Local Plan Wiltshire Wildlife Trust (WWT) welcomes the opportunity to comment on Swindon Borough Council's (SBC) draft Local Plan. Our response focuses on key areas where we believe amendments or clarifications would most significantly strengthen the Plan's contribution to nature recovery, access to nature through green infrastructure and climate resilience. We support the ambition for a greener Swindon but believe the Plan requires clearer, stronger, and more consistent commitments to nature recovery, biodiversity enhancement, and the integration of high-quality green infrastructure (GI) across all developments, given the critical role of high-quality natural greenspace in supporting mental and physical health and making Swindon an attractive place to live and work. Below we set out key points and recommendations.

1. Evidence Base The Plan's evidence base (page 13) for The Environment does not include the draft Wiltshire and Swindon Local Nature Recovery Strategy (LNRS). Although still in draft, the LNRS represents the most up-to-date and locally informed dataset on biodiversity priorities and spatial opportunities for nature recovery. It should therefore be explicitly referenced within the evidence base to ensure that policy decisions are informed by robust, spatially relevant ecological data.

2. Vision and Strategic Objectives The section 'Building a Greener Swindon' (page 19) lacks any explicit reference to biodiversity enhancement, ecological connectivity, or nature recovery. Likewise, none of the Strategic Objectives (pages 19–20) include targets or ambitions relating to nature recovery. Given that SBC declared a climate and ecological emergency in 2022, this omission is surprising and risks undermining the borough's ability to respond meaningfully to both crises. WWT recommends that the Vision and Strategic Objectives be amended to include a clear commitment to restoring biodiversity and embedding nature recovery across all spatial and thematic areas of the Plan.

3.

Strategic Area Policies Only some Strategic Area Policies (SGL01–06, pages 29–34) explicitly reference good-quality green infrastructure. GI should be a universal requirement, not applied selectively, as it underpins climate resilience, public wellbeing, and ecological connectivity. WWT recommends that each Strategic Area Policy explicitly includes the requirement to deliver and connect high-quality, multifunctional green infrastructure.

4. Policy SP1: Sustainable Development Policy SP1 currently omits any reference to biodiversity, ecological networks, or GI provision. We recommend inclusion of wording such as: “Development proposals must include an early-stage biodiversity impact assessment to inform design, protect high-value habitats, and integrate green infrastructure that enhances ecological networks.” This ensures biodiversity is considered proactively, promoting sustainability through habitat protection and improved ecological resilience.

5. Policy SD3: High-Quality Design Parts 1(b) and 1(c) are currently weak. The phrase “show consideration for” is open to broad interpretation and insufficiently enforceable. WWT recommends the following amendments:

- Replace “show consideration for” with “clearly demonstrate how the development will contribute to, enhance, and integrate with the Borough’s Green Infrastructure Network.”
- Strengthen “contribute to landscaping and public realm improvements” to “deliver meaningful landscaping and public realm enhancements, including high-quality GI such as street trees, SuDS, and biodiverse planting.”
- Include reference to lighting impacts on GI and associated wildlife, ensuring protection for nocturnal species and ecological corridors.

WWT also encourages Swindon Borough Council to adopt recognised best practice frameworks, such as Building with Nature and the Wildlife Trusts’ Biodiversity Benchmark, to guide and assess the quality of nature-positive design. These frameworks provide developers and planners with clear, evidence-based standards for delivering sustainable, attractive, and biodiverse places. Swindon can take pride in already hosting one of the country’s leading examples. For example, Nationwide’s Swindon headquarters, which achieved the Biodiversity Benchmark accreditation.

6. Policy CSE3: Green Infrastructure in New Developments Currently limited to major developments, this policy should also apply to minor developments, which can cumulatively deliver significant biodiversity and climate benefits. The Council’s Green Infrastructure Strategy (2010–2026) recognises that GI delivers benefits at both local and landscape scales. WWT recommends:

- Extending Policy CSE3 to include both major and minor developments.
- Ensuring alignment with other relevant policies (e.g., CSE9 Managing Flood Risk, CS1 Carbon Reduction and Sustainable Design, SP6 Climate Stability and the Environment).
- Clarifying that the Nature Recovery Strategy referenced in part 1(d) should read Local Nature Recovery Strategy (LNRS).

7. Policy CSE6: Trees Part 2 references “existing habitats, trees, hedgerows and woodland of value” but lacks clarity on what constitutes “of value”. WWT requests that SBC provides the missing footnote or reference, clarifying that this includes ancient and veteran trees, ancient hedgerows, and ancient woodland, consistent with NPPF guidance.

8. Policy CSE8: Biodiversity, Geodiversity and Nature Recovery WWT welcomes and supports Policy CSE8 overall, particularly its recognition of the importance of biodiversity net gain (BNG) and species enhancement. However: The reference to the LNRS in Part 3 (regarding BNG delivery routes) should also be applied to Part 2, stating: “In all cases, the proposed strategy for delivering biodiversity net gain must align with the Wiltshire and Swindon LNRS.” WWT supports the inclusion of LNRS references in Part 9 regarding species enhancement.

9. Mitigation Hierarchy The Plan contains no reference to the mitigation hierarchy, a fundamental principle of national planning policy. This omission risks inconsistent decision-making and biodiversity loss. WWT strongly recommends explicit inclusion of the mitigation hierarchy, avoid, minimise, restore, compensate, within relevant policies to ensure development proceeds in a way that protects and enhances biodiversity.

10. Ecological Surveys and Evidence The Plan does not contain policies requiring seasonally appropriate surveys by competent ecologists prior to determination. While the Non-householder Checklist references EclAs and the Defra metric, the current language (“may also require”) lacks enforceability. WWT recommends making this a clear requirement in policy text, ensuring all decisions are based on sound ecological evidence and avoiding irreversible harm to protected species or habitats.

11. Policy Language and Enforceability Throughout several policies (including SD3, CSE3, CSE6, CSE8), the use of “should” weakens enforceability. WWT recommends substituting “should” with “must” where requirements are intended to be mandatory. This change would ensure greater policy clarity, consistency, and delivery confidence.

12. Access to Nature The Plan references access to green space only once (paragraph 9.18), noting that development “should have regard to” the Draft Green Infrastructure Strategy aim of providing quality green space within a 15-minute walk. This commitment should be elevated from supporting text to policy level, ensuring equitable access to nature for all residents and contributing to Swindon’s health and wellbeing objectives.

13. Biodiversity Net Gain (BNG) WWT welcomes and supports Policy CSE8 overall, particularly its recognition of the importance of biodiversity net gain (BNG) and species enhancement. However: The reference to the LNRS in Part 3 (regarding BNG delivery routes) should also be applied to Part 2, stating: “In all cases, the proposed strategy for delivering biodiversity net gain must align with the Wiltshire and Swindon LNRS.” WWT supports the inclusion of LNRS references in Part 9 regarding species enhancement. WWT strongly recommends that Swindon Borough Council adopts a 20% Biodiversity Net Gain (BNG) requirement, consistent

with Wiltshire Council's emerging policy. This uplift represents a proportionate and evidence-based response to the climate and ecological emergencies, ensuring that development in Swindon delivers win-win outcomes for nature, people, and the economy. BNG is a critical lever to:

- Secure daily access to nature, proven to enhance people's physical and mental health;
- Retain and enhance corridors of high-quality natural greenspace in the face of development pressure; and
- Make Swindon an attractive place to live, work, and invest, by embedding nature at the heart of placemaking.

• This approach would align Swindon with neighbouring authorities and demonstrate leadership in sustainable growth.

14. Summary of Key Recommendations

- Include the Wiltshire & Swindon LNRS in the Plan's evidence base.
- Strengthen the Vision and Strategic Objectives to include nature recovery.
- Apply high-quality green infrastructure requirements consistently across all policies and development types.
- Embed the mitigation hierarchy and mandatory ecological survey requirements.
- Strengthen policy wording to ensure enforceability ("must" rather than "should").
- Adopt a 20% BNG requirement, consistent with Wiltshire Council's approach.
- Promote Building with Nature and the Wildlife Trusts' Biodiversity Benchmark frameworks for best-practice design.
- Promote universal access to nature, ensuring all residents live within a 15-minute walk of high-quality green space.

15. Conclusion

Swindon Borough Council's Local Plan represents an important opportunity to embed nature recovery, biodiversity enhancement, and climate resilience at the heart of local development. While our review has been undertaken within limited capacity, we hope these focused comments help strengthen the Plan's environmental ambition and practical delivery. WWT urges the Council to ensure the Plan aligns closely with the Wiltshire and Swindon LNRS, adopts a 20% BNG requirement, and champions recognised best practice frameworks such as Building with Nature and the Wildlife Trusts' Biodiversity Benchmark to create a genuinely greener, wilder, and more resilient 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: 500

[REDACTED]

[REDACTED]

[REDACTED]

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 Eliot Baker, Planning Manager, of Irishawk Ltd

[REDACTED]

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

Background Irishawk Ltd (Irishawk) has land interests at the former Intel HQ, Pipers Way. The site provides an opportunity to deliver new homes and will increase urban housing density within the Urban Area as set out within Chapter 3 of the Local Plan. Irishawk supports the identification of the Town Centre as a Sustainable Development Location, which has a wide range of services and facilities to help support growth without significant infrastructure requirements. By its nature, it is a sustainable location, and the Regent Circus site is within walking distance of both Swindon's railway and bus stations. Diversification of the Town Centre is needed to support SBC's 'whole place' approach with increased residential presence required to support the retail, employment and commercial functions of the Town Centre and bring vibrancy to the area. Irishawk also supports the identification of Urban Regeneration Areas, including Pipers Way, as locations that can utilise previously developed land to deliver regeneration and contribute to the growth requirements set out in the plan. Irishawk would, however, welcome clarity on the terminology set out within Policy SS1, the accompanying policies and the policies map. Policy SS1 refers to 'Sustainable Development Locations' whilst the Policies Map identifies 'Sustainable Growth Areas' and 'Sustainable Growth Corridors', despite appearing to be the same designation. Terminology should be consistent.

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.

Either the Policies Map or Policy SS1 is updated so that terminology is consistent with each other.



Respondent No: 501

[REDACTED]

[REDACTED]

[REDACTED]

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 Eliot Baker, Planning Manager, of Irishawk Ltd

[REDACTED]

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

Irishawk raises concern that Policy SS2 is inconsistent with Policy SS1. Table 1 doesn't identify the elevated policy-position of the Town Centre or the Central Area or consider the significant range of services and facilities as well as existing transport hubs. The Urban Area is instead grouped as one which indicates that equal status would be given to proposals within the Urban Area, no matter whether they are in the Central Area, the Town Centre or Sustainable Growth Locations as defined on the Policies Map. This could be borne out of the excessive number of terms used to describe areas with similar functions; terminology should be simplified. For example, there is reference to the Swindon Town Centre, the Central area and the Urban Area. These aren't described in detail in policy terms and the only differentiation between them is the annotations on the Policies Maps. If this is not clarified, the overall 'New Strategic Direction' to encourage Town Centre Rejuvenation may become diluted with sites on the edge of the Central Area given equal policy support.

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.

Table 1 should be updated to include: "Town Centre (or Central Area): This is the heart of Swindon's Urban Area and is the Borough's activity hub, with a significant range of services and facilities. It benefits from excellent accessibility with Swindon Railway Station and the Bus Station at its heart."



Respondent No: 502

[REDACTED]

[REDACTED]

[REDACTED]

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 Eliot Baker, Planning Manager, of Irishawk Ltd

[REDACTED]

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

Irishawk supports the overall aims of SGL01 to diversify the Central Area to bring forward new homes and jobs. It identifies the need to provide a strong retail core and identifies Regent Street, the Parade and Canal Walk as key shopping streets. Given that a reduction in the overall amount of peripheral retail development would help to focus shopping activity in the retail core, it would be helpful to identify that outside of these locations, there is policy support for diversification to help deliver the other ambitions of Policy SGL01. Irishawk queries why the Policy suggests that there may be a limit on the number of new homes that can be delivered. Given the sustainability of the location and the suitability for residential development, it would make sense to clarify this wording. In line with later Policy SD1, the SGL should seem to ensure the effective use of land by optimising density and not apply a cap. The 'new urban living' element of the policy should make clear that the ongoing residential development of the Central Area will support existing and proposed commercial and retail services. As set out above, the importance of the Central Area and its diversification to help deliver the growth set out in the plan should be reflected in SS1 and SS2 as a key feature of the Spatial Strategy. The focus of the Central Area as a 'centre for business' will help to deliver new high quality office space. This will free up low performing employment land such as at the former Intel HQ, which is appropriate for residential within Urban Regeneration Areas and on Sustainable Growth Corridors. Irishawk raises concerns about requirement for a 'comprehensive masterplan' for major development. It is not clear how this would be undertaken or who would lead. Major development needs to be defined within the Local Plan. If major development on several sites was to come forward at once, would there be several different masterplan options? Alternatively, where sites come forward at different paces, a masterplan could remove flexibility for development options on adjacent sites. If sites are forced to coordinate with neighbours at different stages of developing their proposals, this could cause sites that are ready to deliver to be delayed. It should be the role of development management policies to ensure that development does not prejudice adjacent sites. We support the acknowledgement that development sites can enhance walking routes. The redevelopment of Regent Circus offers opportunity to reinstate the historic street network in the area, removing the current barriers to permeability.

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. Remove 'up to' before 8,000 new homes.
2. Remove or clarify the requirements for a 'comprehensive masterplan'. If this is required, it should be stated who would deliver this (i.e. SBC) and set a timescale for completing this and allow flexibility for sites to come forward in advance of this, should there be any delays. Masterplanning adds an extra layer of work that may not be needed and will slow delivery.



Respondent No: 503

[REDACTED]

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 Eliot Baker, Planning Manager, of Irishawk Ltd

[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.

Irishawk supports the identification of Pipers Way as an Urban Regeneration Area (URA). The URA is located on the edge of the Central Area with strong links to the Town Centre that can be strengthened through the Sustainable Growth Corridor. However, we raise concerns that the delivery of the URA relies upon a 'strategic masterplan', but there is no detail on how this would be delivered and who this would be undertaken by. For example, the Former Intel HQ site is within the URA and could deliver homes early in the plan period. Awaiting a strategic masterplanning exercise could delay delivery of this site or remove flexibility for other sites. Development management policies should be utilised to ensure that development does not prejudice adjacent sites. Also, it would be helpful to clarify terminology as the policy refers to a bus transit corridor, whereas the policies map identifies a Sustainable Growth Corridor.

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.

Remove or clarify the requirements for a 'strategic masterplan'. If this is required, it should be stated who would deliver this (i.e. SBC) and set a timescale for completing this. Clarify the bus transit corridor or update to refer to the Sustainable Growth Corridor.



Respondent No: 504

[REDACTED]

[REDACTED]

[REDACTED]

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 Eliot Baker, Planning Manager, of Irishawk 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.

Irishawk raises concerns about point 4 of Strategic Policy SP1, which gives an elevated status to water and energy infrastructure capacity. Statutory undertakers such as Thames Water (under s94 of the Water Industry Act 1991) and SSE (under s16 of the Electricity Act 1989 and section 10 of the Gas Act 1986) have an obligation to provide the necessary network reinforcements to allow for new connections. In accordance with the statutory tests set out in Regulation 122 of the Community Infrastructure Levy Regulations, development should only provide contributions towards improvements to water infrastructure and energy capacity where it is necessary and directly related to development. Development should not be used to deliver improvements resulting from a lack of historic investment by utility companies. This element of the Policy repeats the requirements of draft Policies U1 and D1 and should be removed.

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.

Point 4 of Policy SP1 should be removed.



Respondent No: 505

[REDACTED]

[REDACTED]

[REDACTED]

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 Eliot Baker, Planning Manager, of Irishawk Ltd

[REDACTED]

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

Irishawk raises concerns that Policy SD2 sets out a requirement for all mixed-use development to come forward under a masterplan approach. This is not proportionate and could act to discourage mixed-use regeneration. As per our comments on SGL01 and UGA02, there is no clarity on who would be responsible for bringing forward masterplans. The requirement for masterplans could result in an extra layer that is not required when the issues can be controlled through the development management process and consideration of site-wide issues would form an important part of developing proposals on mixed-use sites.

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.

Point 2 of Policy SD2 should be removed.



Respondent No: 506

[REDACTED]

[REDACTED]

[REDACTED]

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 Eliot Baker, Planning Manager, of Irishawlk
Ltd

[REDACTED]

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

Irishawlk supports 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. Irishawlk supports 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 rate 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.



Respondent No: 507

[REDACTED]

[REDACTED]

[REDACTED]

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 Eliot Baker, Planning Manager, of Irishawk Ltd

[REDACTED]

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

Policy HC2 needs to be reviewed alongside Policy D1 as these policies are inconsistent. Policy HC2 should acknowledge that where viability may be affected and a lower or alternate level/form of affordable housing is proposed, that this would be accepted, as set out in Policy D1.

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 Policy HC2 to acknowledge relationship with Policy D1.



Respondent No: 508

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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 Eliot Baker, Planning Manager, of Irishawlk
Ltd

[REDACTED]

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

Policy HC7 part 2 sets out a requirement on Strategic Growth Locations for a mix of tenures (note there is a typo as this says 'tenue') including opportunities for self-build and custom build. This policy is inappropriate for the Central Area Strategic Growth Location as town centre sites are unlikely to be suitable for self-build and custom build and are unlikely to deliver effective land use that optimises density within the Central Area. Part 1 of the Policy provides all the necessary support for self-build and custom build housing across the Borough, including, where appropriate, on SGLs.

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.

Remove part 2 of Policy HC7.



Respondent No: 509

[REDACTED]

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 Mr Andrew Penna, Strategic Planning Manager, of Barratt Homes (Bristol)

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[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: Please also see attached representation. Introduction These representations are submitted on behalf of Barratt Homes in response to the Swindon Local Plan (2023 – 2043) Regulation 18 Consultation Draft (the 'Draft Plan'). They focus on housing need, delivery trajectory, and spatial strategy and conclude that the preferred growth option is unjustified and ineffective. This is on the basis that: 1. The Council's assessment of housing need is flawed and not positively prepared. More housing must be planned for and more sites allocated. 2. There is no evidence that the housing trajectory for the Central Area can be achieved. In the absence of this information and given concerns about delivery, the only valid conclusion is that there is an over-reliance on the level of growth anticipated in this location over the Draft Local Plan period. 3. The housing trajectory for the Strategic Growth Locations is also unrealistic and unjustified such that distribution over the Draft Local Plan period must be reviewed alongside implications for 5-year housing land supply to ensure this is consistent with national policy. 4. The supply buffer does not provide sufficient contingency for slippage in delivery, which is likely to occur. These concerns are so significant that the only option is to progress a higher growth scenario and either allocate more sites for housing or identify a reserve site/potential location for future growth that could come forward within the Draft Local Plan period should a future review demonstrate the need to do so. Given constraints to development across the Borough and taking account of growth that is already planned, the only realistic option is to plan for growth on land North West of Swindon. The Sustainability Appraisal Interim Report (Aecom, 2025) ('SA') does consider high

growth scenarios and concludes that the North of Swindon / Tadpole Garden Village Extension would represent the best option for delivery. Concerns raised in the SA about impacts upon transport and climate change could readily be addressed by extending the Sustainable Growth Corridor to North of Swindon and Tadpole Garden Village, where development at scale could deliver a step-change in terms of public transport and active travel options that would also benefit the existing communities of Blunsdon St. Andrew and Broad Blunsdon. This would in turn reduce reliance on private car, delivering climate change benefits. The SA does not provide a critique of the North Swindon Growth Scenario in respect of impacts upon communities aside from a reference to there being ongoing and committed growth in this area. We assess that improvements to transport would deliver a moderate positive effect on communities by enhancing access to employment, services and facilities. The SA is undertaken without any assumptions regarding what site or sites could be allocated. In the face of a significant unmet housing need, the Council now needs to undertake this assessment, and the Regulation 19 Plan must allocate more land for housing. Land North West of Swindon Barratt Homes' land interests North West of Swindon [see Appendix 1] has been promoted for housing through the 2023 Call for Sites and considered in the latest Strategic Housing and Economic Land Availability Assessment (SHELAA) (2025) (site ref. s0546). It is clear from Annex 1 of the SHELAA that other land to the North and Northwest of Swindon is also being promoted by various developers/promoters (site refs. s0030, s0030b and s0030c) [see appendix 2, which shows the extent of land interests being promoted in the area]. The assumption at this stage must, therefore, be that these sites are available. The Barratt Homes site was discounted at the first stage of the SHELAA for being predominantly in Wiltshire. It was not therefore, assessed against any site suitability criteria. Other sites to the south of the A419 that would extend Tadpole Garden Village (s0030 and s0030b) were not discounted at the first stage but were subsequently found to be unsuitable due to 'significant concerns' in respect of landscape effects. No other reasons were provided. We are unclear as to how the Council has considered landscape effects on sites proposed via the SHELAA, not least because there appears to be inconsistency in approach. Notably, the North Tadpole allocation in the draft Local Plan (SHELAA ref. s0030c and allocation ref. 18-019) was also assessed as having 'significant concerns' in relation to landscape and high/medium impact within the Landscape Sensitivity Assessment (Lepus, 2025) but is still proposed for allocation. We recognise that the nature of the SHELAA is such that sites are assessed in isolation and at a point in time, but the simple point is that if North Tadpole is regarded as a suitable location for housing development, the assumption must be that landscape effects in this location can be appropriately mitigated. As such other sites in the vicinity, including Barratt Homes' site, would also be suitable in landscape terms. This would be reasonable, given that there are no landscape designations effecting these sites. Together the sites that are being promoted to the North and Northwest of Swindon, including the Barratt Homes land, and adjoining land on the north side of the A419 /to the Northwest of Broad Blunsdon, present a significant opportunity for comprehensive growth. These sites are suitable for housing development and the A419 should not act as a boundary to rule out allocations to the Northwest of Swindon, particularly when: 1. Growth is already proposed at Kingsdown as part of strategy that promoted development within Sustainable Growth Corridors (focused on the A419). 2. Development at scale can deliver sustainable transport choices. 3. Land Northwest of Swindon presents a significant opportunity to address some of the tests of soundness outlined above and deliver large scale housing/ mixed use development in the Plan period and beyond. Notably: 4. It provides an opportunity to integrate new homes with the successful development of Tadpole Garden Village and other recent investment in community infrastructure to the north of Swindon. 5. It provides the best opportunity to develop housing at scale and attract sufficient investment to deliver sustainable transport options. 6. It provides an opportunity to future proof the Draft Plan, forming part of a longer-term growth strategy, potentially extending beyond the Plan period. With the exception of issues related to the Turnpike junction there are no major strategic constraints preventing development of the town to the North and Northwest and a strategic scheme of transport mitigation and sustainable transport improvements could be achieved by large-scale growth. Barratt Homes is working with other developers and landowners to prepare initial masterplan options for North of Swindon and would welcome an opportunity for a meeting to discuss. They have had preliminary discussions with National Highways and will be preparing technical and environmental work to support the identification of the land in the Regulation 19 Consultation Draft. Duty to Co-operate The 'duty to cooperate' is a legal requirement under section 33a of the Planning and Compulsory Purchase Act 2004. As set out in the NPPF (para. 24), effective strategic planning across local planning authority boundaries plays a vital and increasing role in how sustainable growth is delivered, by addressing key spatial issues including meeting housing needs, delivering strategic infrastructure and building economic and climate resilience. In short, effective joint working between authorities is integral to the production of a positively prepared and justified spatial strategy. Compliance with the duty to cooperate is, therefore, critical. Whilst the Local Housing Needs Assessment (2024) and Update Annex (2025) acknowledge the relationships between housing and employment between Swindon and its neighbours (in particular, Wiltshire), the matter of cross boundary collaboration is not addressed in the Draft Plan. In addition, there is no

evidence base document that specifically deals with the duty to co-operate. Consequently, there is no evidence to show that the strategy is informed by any agreements with other authorities and at present, it does not accommodate any unmet need from neighbouring areas. This is contrary to the NPPF (para. 35a). The Council must demonstrate joint working and identify the cross boundary matters to be addressed by the Draft Plan with indicators against which the progress of co-operation in addressing these matters can be addressed. As per the NPPF (para. 36c), this will need to be evidenced by a Statement of Common Ground which must be prepared and maintained throughout the plan-making process in accordance with the PPG (Paragraph: 009 Reference ID: 61-009- 20190315). If this matter is not fully addressed, there is a risk of the plan not being positively prepared or effective. Policy SS1: Swindon's Spatial Approach to Growth Strategic policies should ensure the availability of a sufficient supply of deliverable and developable land to deliver the Borough's housing requirement. This sufficiency of housing land supply should meet the housing requirement. We explain below that there are significant concerns about delivery of sites identified under the Strategic Areas Policies such that the housing requirement is unlikely to be met. Consequently, the Draft Plan is not positively prepared. To make the Draft Plan sound, the Council's response must be to plan for a higher growth scenario and allocate more land for housing. The only realistic option is to plan for growth on land at North Swindon. The Spatial Strategy has a major focus on maximising supply from the "Urban Area Sustainable Development Locations" (Swindon Town Centre/wider Central Area Strategic Growth Locations; Urban District Centres; Urban Regeneration Areas; and along key public transport corridors) to deliver on a vision for the town centre and key radial corridors through the wider urban area. Outside the existing urban area, new development is focused on Strategic Growth Locations (New Eastern Villages, Witchelstowe, Kingsdown, East Wroughton and North Tadpole) with potential for supplementary growth in larger villages, small villages and hamlets if sympathetic to local character. The role of the rural service centres is unclear. Barratt Homes does not question a strategy that focuses on the existing urban area. However, we explain in our comments on draft Policy SP2, that our client questions the level of supply and the over-reliance on delivery in this location to meet the housing requirements. Similarly, and as a matter of principle, our client has no objection to the proposed Strategic Growth Locations. As explained below, it is the potential for under delivery in these locations that is a significant concern. In our view, these concerns are so significant that there is likely to be unmet need. The only way to address this is to adopt a higher growth scenario and identify more sites/locations for housing development. Policy SP2: Homes for the Community and SGL01, SGL02, SGL03, SGL04 and SGL06 Policy SP2 sets out that the Council's housing requirement is 1,205 homes per year, as per the new standard method (December 2024). This equates to 24,100 new homes over the 20-year plan period from 2023 to 2043. Taking account of net completions in 2023/24 (831) and existing commitments (12,767), there is a net requirement for 10,502 new dwellings. The Local Plan should clearly set out the housing requirement and the components of the supply within Policy SP2. The current inclusion in the supporting text at the end of the chapter does not set out the approach in a coherent manner. We suggest a table is included with Policy SP2 as per the below:

Housing Requirement pa 1205	Plan requirement 24100	Net completions 23/24 831	Planning permissions granted 12767	Residual Housing Requirement 10502
-----------------------------	------------------------	---------------------------	------------------------------------	------------------------------------

The components of the proposed supply should then be clearly set out. As drafted, they are not. The Plan includes rolling over strategic site parcels without planning permission from the 2026 Local Plan (3,498) homes with new site allocations totalling 8,344 homes. When added to planning permissions granted this equates to 24,609 dwellings identified in the supply but these figures are less than the housing capacities identified within the Strategic Growth Locations and the Urban Growth Areas, which total 24,811. It is not clear how the various components make up the figures within the SGLs and UGAs and where permissions outside of these areas sit or how windfalls might be accounted for. The Government's objective of significantly boosting the supply of homes set out in the NPPF remains paramount (para 61). In this context, Government Guidance on Housing and Economic Need Assessment (24 February 2025) clearly states that the new standard method is the minimum annual local housing need figure. It is concerning, therefore, that Policy SP2 identifies a housing requirement and then states that that it will "seek to enable these targets to be met subject to all relevant policies of this Plan". It is not a question of "seeking to meet" but of developing a robust strategy to ensure housing delivery achieves at least the minimum local housing need. This must be made clear. Annual housing completions in Swindon have ranged between 595 dwellings (in 2013-14) to a high of 1,699 dwellings (in 2016-17). Most recently, delivery was in the region of 1,000 dwellings per year over the years 2021/22 to 2022/23 and then lower in 2023/24 at 831. In this context, setting the housing requirement at 1,205 dwellings per year and identifying a deliverable supply is challenging. The only way to achieve this level of completions, is to ensure that supply is sufficient to provide for year-on-year delivery with a reasonable 'buffer' as a contingency for delivery issues. We explain below that this is not currently the case and as such the Draft Plan has not been positively prepared in how it proposes to meet its housing requirement. This has serious socio-economic implications for Swindon, particularly in the context of a national housing crisis and rising house prices/affordability and a shortage of affordable housing. The Draft Plan, therefore, plans to meet

local housing need but fails to demonstrate a sufficient supply. It is not, therefore, positively prepared in seeking to support social and economic growth. A higher growth scenario much be progressed and more sites/locations must be identified for housing development. Housing Trajectory The NPPF sets out that strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period and if appropriate to set out the anticipated rate of development for specific sites (para. 78). In this case, there are flaws in the housing trajectory. Notably: 1. The 'New site allocations breakdown' only provides a housing trajectory for the proposed allocations. There is no trajectory for the strategic sites that have been 'rolled over' from the adopted Local Plan (3,498 dwellings). Given the age of the adopted Local Plan, the deliverability of these strategic sites must be fully assessed as they have been allocated for over 10 years with little to no progress made on delivery. The Council must provide information on these sites to allow a rigorous check of the delivery assumptions and to satisfy the NPPF Glossary definition of deliverable. Without this information, our client objects to a strategy that relies on the delivery of these sites to meet the housing requirement. 2. The housing trajectory for the 'New site allocations breakdown' assumes that new homes will start being delivered in year 5. We have considered this in the context of Lichfields "Start to Finish" (2024) document which sets an industry standard for assumption on the delivery of residential developments in England and Wales. Our view, informed by this evidence, is that the housing trajectory is optimistic with the median average time from validation to completion of the first dwelling more likely to be six years minimum. Only sites of 50-99 dwellings are likely to deliver within the five-year timeframe indicated in the trajectory and most of the allocated sites are above this threshold. 3. When comparing the trajectory in New Site Allocations Breakdown against Lichfields' Start to Finish data for build out rates, it is clear that particular site sizes are anticipated to build out significantly more quickly than the evidence shows. For example: 4. The Council considers that sites between 100 - 499 homes will deliver at a rate of around 100 dwellings per year. However, Table 4.2 of Start to Finish shows that the average build out rate is likely to be between 44 – 49 dwellings. 5. The Council has assumed that sites of 50 - 100 homes will deliver at a rate of 50 dwellings per year. However, Start to Finish indicates that just 18 - 20 homes are likely. 6. The 'New site allocations breakdown' assumes that none of the proposed allocations will deliver in years 1 to 5. However, the Council's five-year housing land supply statement assumes a supply of 4,272 from strategic site allocations. There is significant disconnect here, which needs to be addressed. In summary, assumptions made in the housing trajectory contain flaws which must be addressed. It is suggested that Lichfields Start to Finish is reviewed and adjustments made to reflect real-world evidence on delivery. As it currently stands, the implication for housing delivery over the plan period is that there will be a shortfall. This is contrary to the NPPF, which requires an identified supply over the Draft Plan period, notwithstanding that a review may be carried out in 5 years' time. Additional allocations must be made to ensure this shortfall is addressed otherwise the Draft Plan will not positively plan for housing need across the plan period. Housing Delivery The Spatial Strategy assumes that Swindon's Central Area will play a fundamental role in the spatial strategy, with the potential to deliver up to 8,000 new homes (minimum of 4,317 homes over the plan period) and 6,000 new jobs, alongside a regenerated and vibrant main town centre environment. Our client supports regeneration of the Central Areas and does not question the "town centre first" approach. However, local plan strategies must be based on the realities of delivery. Notably: 1. Urban brownfield sites are often complex and challenging to deliver. This is because there is often multiple landownerships, existing users and contaminated sites. They are at risk of major delays to delivery. 2. Viability is such that town centre developments often deliver nil affordable housing, even in parts of the country where development viability is much stronger than in Swindon town centre. The evidence on deliverability does not cover all the sites that are assumed to come forward within the Central Area. It has not, therefore, been possible to scrutinise the assumed supply. Notably, whilst Policy SGL01 states that 8,000 homes can be brought forward within the Central Area, only 10 sites are proposed to be allocated (18-001 to 18-010), which have a capacity of 4,347 homes. This includes 'Land to the North of the Station' which is proposed to deliver 1,358 homes yet there is no evidence that the site has been put forward by the landowner (it has simply been identified by the Council through the Urban Capacity Study). As a result, there are over 3,500 homes anticipated to be delivered within the Central Area over the Local Plan Period not on allocated sites. This is an incredibly high proportion and clearly presents risks to delivery, particularly if the assumption here is that the supply is from windfalls. Furthermore, there is no evidence to indicate where existing permissions may contribute to this figure or whether they are likely to be deliverable. This is acknowledged within the SBC Sustainability Appraisal Interim Report (para. 5.2.42) which draws comparisons with the significant issues of delivering on such a large scale "avoiding a repeat of issues experienced following the adopted Local Plan" and that "The current proposal is to commit to delivering 4,317 homes in the Central Area over the plan period, which is considered to be a suitable minimum figure associated with a sufficient degree of delivery confidence, but it is important to be clear that even delivering new homes in the Central Area at this rate would represent a step-change." There is also uncertainty about the delivery rate at the Strategic Growth Locations. For example: 1. New Eastern Villages (NEV): was allocated in the adopted Local Plan to deliver 8,000

homes by 2026 but has faced major delivery challenges, and to date has delivered just a small handful of new homes. The new proposal is to support 10,000 homes in total including 8,000 in the plan period. This is a very complicated site given flood risk zones and numerous landowners. Our client does not suggest that this allocation should not be carried forward but considers that delivery of 8,000 homes in the plan period is not achievable. This is reflected in the conclusions of the Sustainability Appraisal Interim Report which states that delivery is “associated with a degree of uncertainty” and Lichfields Start to Finish 3, which sets out that such large such sites (noting that most of the parcels are in excess of 1,500 homes) will take in excess of six years to deliver the first house. This even in the case of the parcels that gained permission in 2021 (ref. S/OUT/17/1990 and S/OUT/19/0582) that dwellings are unlikely to be delivered in the first 4 years of the plan. 2. Kingsdown: whilst there is a resolution to grant planning permission for the main site the SA notes that there are outstanding questions regarding associated/ nearby smaller site options which brings into question the potential to achieve comprehensive growth and maximising benefits for the Broad Blunsdon area. 3. Witchelstowe: The SA notes that housing development on the remaining parcels has previously been approved, but that permissions have not been implemented and have now lapsed. It is therefore not clear the component of the proposed supply that this forms. If the intention is to deliver 1,620 homes via a new consent, then based on Start to Finish 3, it is unlikely that the site will be complete in the plan period. For the Draft Local Plan to be sound it must be positively prepared, justified and effective. It is critical that an accurate assessment of availability, suitability, deliverability, developability and viability is undertaken. The Council’s assumptions on lead in times and delivery rates must be correct and supported by parties responsible for the delivery of housing on each individual site. This information must be published as part of the evidence base for the Regulation 19 Plan so that it can be scrutinised. Buffer The Standard Methodology for calculating housing need (NPPF para. 62) is the minimum housing 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. We estimate there are 1,340 homes proposed on allocated sites above the housing requirement whilst para. 6.8 of the draft Local Plan refers to the “current buffer” of 1,000 homes described in the supporting text (just 4% over a 20-year plan period). At least a 10% buffer should therefore be added to the overall housing requirement to provide sufficient flexibility. Unmet need As set out in the NPPF (para 27), the local planning authority must establish a housing requirement figure, which shows the extent to which their identified housing need and any needs that cannot be met within neighbouring areas can be met over the plan period. We have explained above that there is no evidence to show that the spatial strategy is informed by agreements with other authorities, which is contrary to advice in the NPPF (para 35a). This must be addressed. The NPPF (para 69) also explains that the housing requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas or reflects growth ambitions linked to economic development or infrastructure investment. The Council should clearly explain if it considers there are circumstances in Swindon to justify a housing requirement above the minimum local housing need. Notably: Cotswold District Council is at an early stage of plan preparation. The new standard method local housing need has increased dramatically from 504 to 1,036 dwellings per year, set against delivery rates that have averaged 358 dwelling over 2021/22 - 23/24. As such there is a clear risk of unmet need. Wiltshire Council clearly relates very closely to Swindon and the Swindon housing market area stretches a considerable way into Wiltshire. The Wiltshire Local Plan was submitted in 2024 under ‘transitional arrangements’ meaning that its local housing need is based on the old standard method (2023), which is 1,917 dpa, rather than the new standard method (2024) which provides a figure of 3,525 dpa. That aside, there is a lack of identified supply to deliver on the housing requirement over the latter part of the plan period and, furthermore, the Inspector wrote to the Council (April 2025) suggesting the need to extend the plan period. Even if the draft Wiltshire Local Plan gets to adoption, the Council will be required to prepare a new plan to provide for the high local housing need figure. This clearly points to a future risk of unmet need. The risk of unmet need in adjoining authorities is significant and must factor as a consideration in determining the growth scenario. The scale of unmet need is so significant that is pushes towards a high housing requirement and a higher growth scenario. Summary In summary, the Council must plan for a higher growth scenario, given that: There needs to be a higher supply buffer reflective of risks to delivery across the proposed supply (notably within the Core Area and NEV) and learning lessons from the adopted Local Plan (i.e. the lack of a 5YHLS in the years since its adoption). There is a risk of unmet need from Cotswold District and Wiltshire Council. These concerns are so significant that the only option is to progress a higher growth scenario and either allocate more sites for housing or identify reserve sites/potential locations for future growth, that could come forward within the Draft Local Plan period should a future review demonstrate the need to do so. Given constraints to development across the Borough and taking account of growth that is already planned, the only realistic option is to plan for growth on land North of Swindon. A higher growth scenario has been appraised in the SA and it is acknowledged that that there are limited issues/impacts in most regards. The option for growth to the North of Swindon would deliver the most homes and would deliver early in the plan period due to the progress made on several sites. Some

concerns have been flagged, in terms of transport and climate. This is reflective of the appraisal is being undertaken without any assumptions regarding what site or sites could be allocated. In reality, these issues could readily be addressed via public transport and active travel projects which can be achieved through development at scale and via an extension to the Sustainable Growth Corridor. Our client would welcome the opportunity to discuss the potential for growth on land North of Swindon and develop a robust evidence base to show that sustainable development could be achieved without any unmitigated adverse effects.

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 Spatial Strategy, Housing Requirement and Proposed Allocations require significant amendments as per the suggestions above to ensure that they meet the legal requirements and are sound.



Respondent No: 510

[REDACTED]

[REDACTED]

[REDACTED]

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 Mr Andrew Penna, Strategic Planning Manager, of Barratt Homes (Bristol)

[REDACTED]

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

We raise concerns about point 4 of Strategic Policy SP1, which gives an elevated status to water and energy infrastructure capacity. Statutory undertakers such as Thames Water (under s94 of the Water Industry Act 1991) and SSE (under s16 of the Electricity Act 1989 and section 10 of the Gas Act 1986) have an obligation to provide the necessary network reinforcements to allow for new connections. In accordance with the statutory tests set out in Regulation 122 of the Community Infrastructure Levy Regulations, development should only provide contributions towards improvements to water infrastructure and energy capacity where it is necessary and directly related to development. Development should not be used to deliver improvements resulting from a lack of historic investment by utility companies. This element of the Policy repeats the requirements of draft Policies U1 and D1 and should be removed.

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.

Point 4 of Policy SP1 should be removed.



Respondent No: 511

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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 Mr Andrew Penna, Strategic Planning Manager, of Barratt Homes (Bristol)

[REDACTED]

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

Policy HC2 needs to be reviewed alongside Policy D1 as these policies are inconsistent. Policy HC2 should acknowledge that where viability may be affected and a lower or alternate level/form of affordable housing is proposed, that this would be accepted, as set out in Policy D1.

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 Policy HC2 to acknowledge relationship with Policy D1.



Respondent No: 512

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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 Mr Andrew Penna, Strategic Planning Manager, of Barratt Homes (Bristol)

[REDACTED]

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

Policy SP5 seeks to demonstrate how the growth set out in the plan can help to deliver better-connected, active neighbourhoods, whilst Policies ST1 and ST2 seek to promote sustainable transport including active travel and public transport. It is therefore concerning that these policies do not consider the role that the identified 'Sustainable Growth Corridors' shown on the Policies Map in delivering improvements to the transport network. Clarity should be provided within Policy SP5 and ST1 on the role of these corridors and whether these locations will be identified for infrastructure improvements. Is there an expectation that development within these locations provides contributions towards these enhancements? Is there a presumption that growth outside of these corridors is unsustainable? At present, these corridors do not connect the North Tadpole SGL or to the wider development at Tadpole Garden Village. This appears to be a significant flaw in the Policy which doesn't acknowledge how public transport can help bring forward sustainable development to the north west of Swindon. Is there an expectation that development to at North Tadpole provides Demand Responsive Transport in absence of a proposed Sustainable Growth Corridor?

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 Map should be updated to be consistent with the Policy wording in SP5 and ST1. Reference to the Sustainable Growth Corridors should be built into Policies SP5, ST1 and ST2 with clarity on what the expectations on developers are in terms of supporting the delivery of any improvements.



Respondent No: 513

[REDACTED]
[REDACTED]
[REDACTED]

Q1. Title Mr

Q2. First Name Alex

Q3. Last Name Hawtins

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) Lichfields on behalf of Mr Andrew Penna, Strategic Planning Manager, of Barratt Homes (Bristol)

[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.

Policy CSE9 should be updated to take account of the changes to the Planning Practice Guidance for Flood Risk and Coastal Change.

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.

There is a typographical error in para. 1d) '..that demonstrates the safe [and] discharge of surface...' Policy CSE9 should acknowledge the need for a proportionate approach to the Sequential Test and sets out that schemes with mitigation measures for surface water flood risk need not apply the sequential test.



Respondent No: 514

[REDACTED]

[REDACTED]

[REDACTED]

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 Mr Andrew Penna, Strategic Planning Manager, of Barratt Homes (Bristol)

[REDACTED]

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

Policy U1 has the potential to unnecessarily block development as a result of capacity constraints in the utility network. Statutory undertakers such as Thames Water (under s94 of the Water Industry Act 1991) and SSE Networks (under s16 of the Electricity Act 1989 and section 10 of the Gas Act 1986) have an obligation to provide the necessary network reinforcements to allow for new connections. The suggestion, therefore, that conditions could be applied to development to block occupation would not be in accordance with the tests and they would not be reasonable or relevant to planning. Such conditions should not be used to deliver improvements resulting from a lack of historic investment by utility companies.

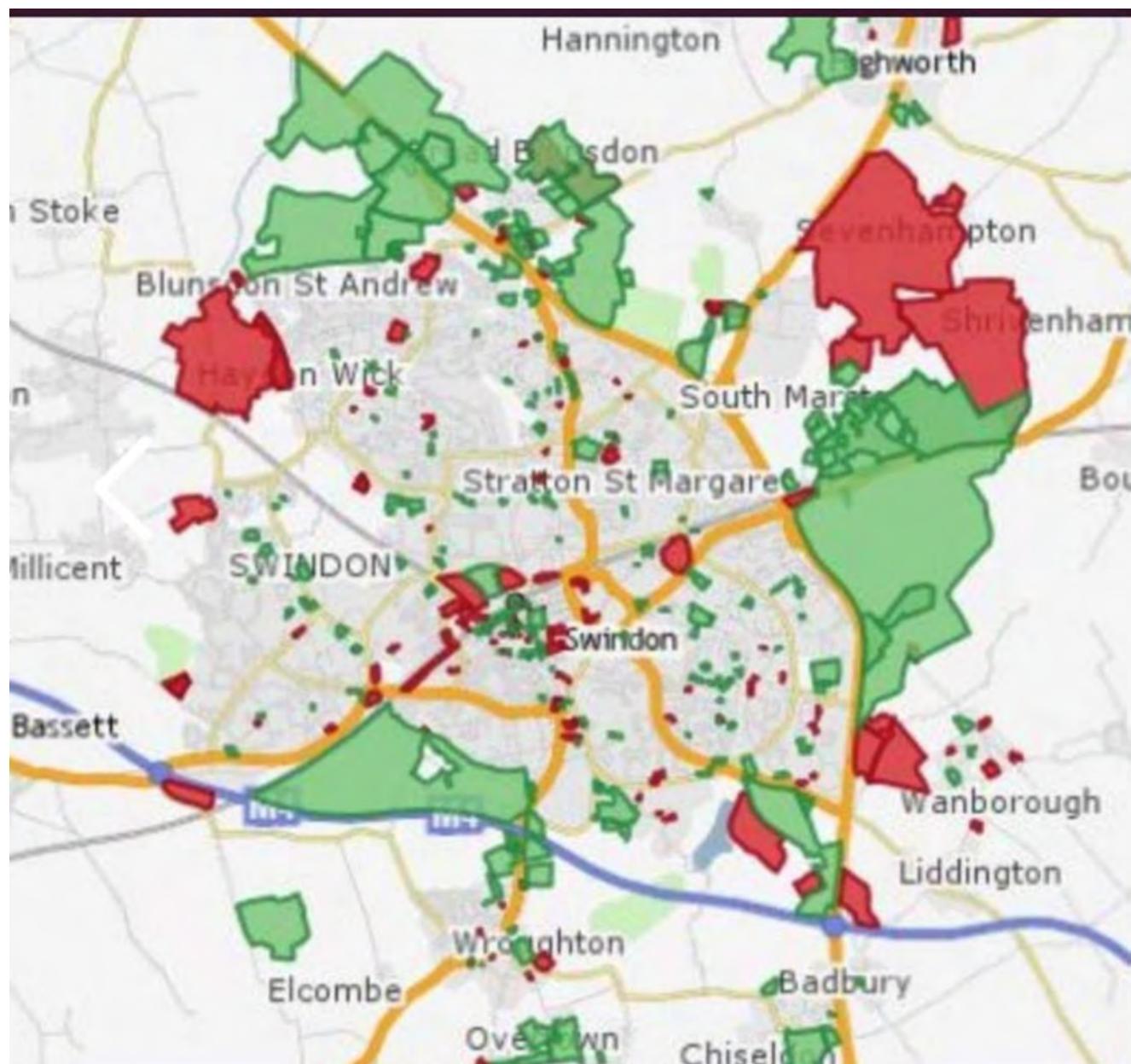
Q13. Please set out the changes you consider are needed. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Point 3 should be removed.

Appendix 1



Appendix 2





Respondent No: 515

1000

[REDACTED]

[REDACTED]

Q1. Title _____ Mr _____

Q2. First Name Daniel

Q3. Last Name West

Q4. Job Title (where relevant) Senior Planner

Q5. Organisation (where relevant) David Lock Associates on behalf of Hallam Land

The figure consists of a 4x4 grid of 16 black bars. The bars are arranged in four rows and four columns. The bars in each row are of equal length, and the lengths of the bars in each column increase from left to right. The lengths of the bars in the first column are approximately 10, 12, 8, and 15 units. The lengths of the bars in the second column are approximately 18, 20, 14, and 16 units. The lengths of the bars in the third column are approximately 22, 24, 18, and 21 units. The lengths of the bars in the fourth column are approximately 26, 28, 23, and 25 units.

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

(SBC admin note: Please also see attached response.) Hallam Land raises concern that as written, major development proposals over 49 units, or 4,999 m² of floorspace would be required to undertake whole life-cycle carbon assessments to support proposals. The policy should not de facto and apply to all development without the consideration of the type of development (i.e., for outline planning applications where the required inputs are not yet known and it would be onerous to provide (e.g., layout, specific uses and floorspaces, material specification)). The justification for the requirement to undertake WLCAs is unclear and no reference is made to the forthcoming Future Building Standard and Future Home Standard which are focused on significantly reducing carbon emissions from new buildings and will be implemented through Building Regulations. FBS and FHS bring significant cost uplifts to development and are an important consideration in the overall viability of any development. It is essential to ensure unnecessary policy burdens are not placed on 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.

Hallam Land suggest the policy is amended to require an Energy and Sustainability Statement which looks at the issues and opportunities more widely rather than a prescriptive unevidenced requirement for an Whole Life Carbon Assessment.



Respondent No: 516

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Daniel

Q3. Last Name West

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) David Lock Associates on behalf of Hallam Land

[REDACTED]

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

(SBC admin note: Please also see attached response.) Whilst Hallam Land support the provision of well designed, integrated and functional green infrastructure within developments, it raises a concern over the apparent duplication of policy and guidance that is referred to in this policy. It requires developments to achieve a number of 'targets' Urban Greening Factor, Green Infrastructure Standards and Building for Nature. There is no supporting text to demonstrate whether these 'targets' are all compatible. Hallam Land also note that the Local Plan doesn't provide information (target, policy or otherwise) for open space standards. The policy as written could prove challenging to interpret if not reviewed and amended.

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: 517

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Daniel

Q3. Last Name West

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) David Lock Associates on behalf of Hallam Land

[REDACTED]

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

(SBC admin note: Please also see attached response.) Whilst Hallam Land support the draft policy wording in relation to the provision of SUDS features in accordance with CIRIA guidance and ensuring appropriate treatment adjacent to water courses, we do not consider it necessary to include points 1-3 within the Local Plan that as written does little more than state the national policy position for flood risk. Hallam Land consider it more effective to remove and instead rely on national policy including PPG updates as relevant.

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 points 1 - 3.



Respondent No: 518

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Daniel

Q3. Last Name West

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) David Lock Associates on behalf of Hallam Land

[REDACTED]

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

(SBC admin note: Please also see attached response.) The requirement in HC3 1a to provide all new housing in accordance with optional Building Regulations M4(2): Cat 2 Adaptable dwellings standard, is considered onerous and does not appear to be supported by any technical evidence that suggests it responds to an identified need within the Borough. Whilst it is understood that this might be brought into force as a mandatory part of the Building Regulations it is not currently the case, and in any event should not be duplicated through 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.

Hallam consider Part 1a of Policy HC3 should be deleted.



Respondent No: 519

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Daniel

Q3. Last Name West

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) David Lock Associates on behalf of Hallam Land

[REDACTED]

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

(SBC admin note: Please also see attached response.) Part 5 states that all residential development 'must meet the Nationally Described Space Standards', however this does not comply with the National Planning Policy Framework (NPPF), in which Footnote 51, states that "Policies may also make use of the nationally described space standard, where the need for an internal space standard can be justified". However, no justification has been provided by the Council, outlining the need and viability of such proposals. Requiring a developer to build to such standards would increase build costs, leading to higher entry point prices. This may result in such dwellings being unaffordable to some buyers, pushing them further into affordable housing need. The inclusion of the requirement to meet the NDSS for all dwellings is overly prescriptive.

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.

For the reasons as set out above, DM4 as currently drafted is not sound, and Part 5 should be deleted. NPPF allows LPAs to use the NDSS where justified, and Hallam Land does not consider there is robust evidence to support the application of this standard.



Respondent No: 520

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Daniel

Q3. Last Name West

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) David Lock Associates on behalf of Hallam Land

[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

Part B – Please use a separate sheet for each representation

Name or Organisation: Hallam Land

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

Chapter	CHAPTER 4: THE SPATIAL STRATEGY & STRATEGIC AREA POLICIES	Policies Map	Yes	Evidence base document e.g. the Sustainability Appraisal	
	Policy SGL 06 – North Tadpole				

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 proposed allocation

Hallam Land supports the inclusion of North Tadpole Strategic Growth Location (SGL) as a proposed allocation in the emerging Plan (draft Policy SGL06). North Tadpole will complement the established and growing new community at Tadpole Garden Village (a strategic allocation in the adopted plan) and will bolster this logical direction of growth at Swindon, supported by the draft Plan evidence base including the Sustainability Appraisal.

Directing additional growth to the north of Swindon, at Tadpole Garden Village, also aligns with and supports the ongoing commitment to infrastructure, including community, education, health and also strategic transport interventions at this location to support the growing community.

Amount

Hallam Land supports the identification of SGL06 and the evidenced contribution that North Tadpole will make to meeting Swindon's local housing need.

The proposed allocation at North Tadpole includes land to the north of William Morris Way, which forms part of the land opportunity promoted by Hallam Land known as 'Land at Lower Widhill Farm' that was put forward to the Council's Call for Sites. Hallam Land have a consultant team in place and have been testing the development parameters and masterplanning principles to explore the opportunity for the site ensuring the most efficient use of land.

The allocation proposes some 513 homes, the Local Plan evidence base assumes just 350 homes on land controlled by Hallam, the remainder being delivered on a parcel of land south of William Morris Way. Through our work, we are confident that there is additional sustainable capacity for some 450-homes to be planned on Hallam's land, with those homes being located outside of the 'Inner Zone of Influence' for the North Meadow and Clattinger Farm Designated Special Area of Conservation (SAC), and within the proposed allocation boundary as drawn.

A Vision Document is submitted to accompany these representations which provides an illustrative concept plan that presents the development opportunity for the site and how that additional quantum can sit comfortably within the site, whilst providing enhanced green infrastructure and ecological habitat.

This quantum carefully balances the opportunity to focus additional growth at a committed strategic growth location, creates additional patronage to support bus services, and better supports the delivery of local centre uses that complement the community and education uses that are proximate to the site, and, in addition provides strong and enduring landscape treatment at the urban area transition.

Swindon Borough Council will be cognisant of the extent of land that Hallam Land control, as presented in our representations to previous Local Plan drafts and the earlier Call for Sites. Hallam Land's submission to the Call for Sites identifies the land available and the development potential (SHEELA ref 0030b).

In addition, the landowner confirms full availability and control of the Lower Widhill Farm parcel (SHEELA ref 0030b), with no legal or ownership constraints to delivery within 5 years of allocation. This supports an uplift to at least 600 homes, with 450 sustainably accommodated on the controlled land north of William Morris Way (as illustrated in the Vision Document), and the balance on adjacent parcels to ensure comprehensive delivery. This exceeds the SHELAA's conservative 352 homes (under site ref: s0030c) by optimising densities, aligning with the NPPF's stance on effective land use.

Our representations to Policy SS1 raise some concern over the deliverability of some of the components of the Council's supply, particularly in respect to the town centre regeneration sites.

Hallam encourage a revised Policy SGL06 to reflect the site's ability to accommodate additional development potential – i.e., an allocation of at least 600 homes.

Demonstrating site capacity and delivering a sustainable form of development

Hallam question the robustness and accuracy of the site appraisals contained within the Strategic Housing and Economic Land Availability Assessment (2025) and consider that relative sustainability benefits of the full site have been underplayed.

The draft allocation takes forward a reduced quantum of development - (under site reference s0030c), the SHELAA identifying a capacity of 352 homes in that option.

The call for sites submission provided a concept plan which demonstrated the ability to deliver a capacity of 500 homes, including the potential for some additional land for employment. It is not clear how a reduced quantum of 350 as proposed by SBC has been arrived at or justified when the proposed allocation boundary remains the same as presented by Hallam in the Call for Sites insofar as the residential element.

The evidence in the SHELAA correctly asserts that the 'site [is] located next to existing school facilities and doctors' surgery and would help to finish off development area'. Realisation of additional and optimal development potential at Lower Widhill Farm will best support effective use of land, the delivery of local centre uses and offers a rounded extension to planned growth in Swindon, defined by a robust and enduring landscape edge.

The SHELAA RAG applies a red rating to 'landscape' matters only, with no other matters drawing that conclusion, the inference from the text might suggest that landscape harm could be the Council's justification for a reduction in quantum.

The site was assessed in the Landscape Sensitivity Assessment for Proposed Housing and Employment Sites (August 2025). The report states that "*Views into the site from William Morris Way are substantially obscured by hedgerows and trees. Views into the site from the A419 road are obscured by woodland. Development at this site would be more appropriate to the south, towards Swindon and closer to existing built form at Tadpole Garden Village.*"

We do not consider that the assessment as undertaken and reported would prevent additional capacity from being realised at the site. The concept plan shows how the land subject to the draft allocation can deliver on-site effective and enduring GI network and frame the development.

To confirm, there are no landscape designations covering the site. Whilst at the edges of the administrative boundary, it is unremarkable in this respect and made up of some 30 hectares of indistinct agricultural fields, with some boundary features that will be retained within the proposals. The Lower Widhill Farmhouse and building complex sits north, outside of the site. Some of the agricultural building footprints are located within the site boundary, to be proposed as open space. At a distance from the site to the north – beyond the farm complex – lies the River Ray. The River Ray valley on its southeastern bank is populated by a series of low mounded hills, which provides an element of screening.

The concept plan has been informed by an assessment of the site and an understanding of its landscape value and characteristics.

It is also interesting to note the very minor distinction of impact as reported in the SHELA from the reduced boundary (s0030c) as proposed in the draft Plan and the greater land extent (s0030b), appears to be impact arising to heritage. Hallam do not agree that the impact to heritage assets from this expanded boundary are commensurate with a conclusion that the option is not deliverable.

Hallam Land acknowledge the locations of two listed buildings, Lower Widhill Farmhouse and Chapel Farmhouse, however the concept plan demonstrates the embedded mitigation that can be applied to reduce any harm to their settings, by way of development offset and planting.

The SHELA also refers to the site being within some areas of flood risk however this is only associated with the River Ray and built development can be kept out of areas of highest flood risk.

There are no technical reasons why additional development should be precluded on this site.

(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 draft policy SGL06 should be updated to include an uplift in the number of homes currently proposed from 513 to 600, on the assumption that land controlled by Hallam Land at Lower Widhill Farm, can accommodate 450 homes, as shown in the concept plan that supports the submitted Vision document.

The wording 'at least' should be added to the housing figure in the policy, recognising that any potential uplift that could be sustainably delivered should be accommodated where possible, acknowledging the flexibility afforded by the land control.

We do not consider that a 'strategic' masterplan is required as part of the policy framework. The land is not subject to complicated land control nor constraint. Each parcel is accessed directly off the existing highway network. The preparation of a strategic masterplan for the allocation as a whole is therefore not considered to be necessary and could delay delivery of development that is much needed. Hallam Land would of course be developing a masterplan for their land as part of any proposal.

For part a) 'of value' is added to the policy wording seeking the incorporation of existing trees into front boundary treatments or as part of the public realm, to secure a proportionate response, to be confirmed through an arboricultural survey taking into account health of the tree.

Part d) is imprecise as drafted. Some amendments are proposed.

In relation to Part 3 and provision of SANG in line with the Interim Mitigation Strategy Guidance, 'unless otherwise agreed with Natural England and/or the Local Planning Authority' is suggested to be included to ensure consistency with the previous sentence which acknowledges the need for consultation in respect of mitigation contributions. The same applies for any requirements around the specification for a SANG and these may ultimately differ from the locally produced guidance.

Suggested draft policy:

Policy SGL 06 – North Tadpole

1. North Tadpole is identified as a Strategic Growth Location, as designated on the Policies Map. North Tadpole is proposed to bring forward at least 600 new homes over the Plan Period. The Council will require high-quality, comprehensive development in this area that comes forward through a strategic masterplan.
2. Proposals for development in this area shall:
 - a) create a positive and active built frontage along William Morris Way, with existing trees of value incorporated where possible into front boundary treatments or as part of the public realm;
 - b) establish a consistent pedestrian route along William Morris Way to link the area under the A419 to Ermin Street and Broad Blunsdon;

- c) recognise the prominence of the Tadpole Triangle site (s0106b) when approaching from the east and ensure that it responds positively to its position, potentially with the inclusion of a small convenience store at the ground floor; and
- d) respond positively to topography ~~via street layout and massing and take opportunities to frame views into the countryside and take opportunities to embed a robust landscape design within the development.~~

3. Provide mitigation contributions in line with North Meadow SAC Interim Mitigation Strategy or successor document, and in consultation with Natural England. Strategic Alternative Natural Green Space provided on site should be in line with the Guidance in Appendix 4 of the Interim Mitigation Strategy or successor document, 'unless otherwise agreed with Natural England and/or the Local Planning Authority'.

(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: 521

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Daniel

Q3. Last Name West

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) David Lock Associates on behalf of Hallam Land

[REDACTED]

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

(SBC admin note: Please also see attached response.) Housing requirement The level of growth proposed in the draft plan, and its effectiveness to meet housing need should be considered in the context of and to what degree the Plan is positively prepared when considering the level of ambition in planning for a generation ahead. The wording as currently proposed in the draft policy SP2, that the Council will 'seek to enable these targets to be met subject to all relevant policies of this Plan' is not effective. In this context, Hallam Land notes that the final policy must be supplemented with a housing requirement figure – a spatial approach alone will not result in a strategy that seeks to meet Swindon's objectively assessed needs. Paragraph 69 of the NPPF requires strategic policy-making authorities to establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. The current adopted Plan requirement is for 22,000 homes and it is clear that there is a need for marked improvement in delivery and there is significant backlog to be met already. The average annual net completions between 2011 – 2020 was just 923 homes (The Council's Housing Completions Monitoring Report April 2020). The Authority Monitoring Report 2024-2025 (September 2025) indicates that delivery has slowed further still, with 831 completions in 2023/24 and 892 in 2024/25. Draft Policy SP2 ('Homes for the Community') refers to the standard method figure of 1,205 homes per year, equating to 24,100 new homes over the 20-year Plan period to 2043. The current plan set a requirement figure of 22,000 homes over the plan period from 2011 to 2026, a 15 year period, to be achieved through a stepped trajectory of 1,150 dwellings per year for the period 2011 to 2016 and increasing to 1,625 dwellings per year for the period 2016 to 2026. In this context the target figure now proposed across a 20 year plan period is a reduction in the growth ambition of the adopted plan. The 2025 Authority Monitoring Review (AMR) includes a housing trajectory (Figure 1: Housing trajectory showing annual net completions and net yearly delivery projections for the period 2023 to 2045) which shows a trend of a reducing supply from 2035 that does not meet annual requirement. The 2025 AMR identifies some 237 homes from windfall sites per annum – (79 dwellings average net completions per annum across minor windfall development) applied for years 3, 4 and 5 of the Borough's 5 Year Housing Land Supply, taking account of a two-year lead-in time before development would begin. This number significantly contrasts to the windfall assumptions contained in Appendix 3 Housing Trajectory to the draft Plan – which over the 20 year plan period are projected to be 2818 of the supply, averaging some 140 dwellings per year. A near doubling from what is currently assumed. Indeed, the evidenced windfalls (net completions) of some 79 dwellings per annum over the last two monitoring years 2024-25 relate to a policy context of an out of date plan, no 5 year land supply and a presumption in favour of sustainable development. It is anticipated that as the larger strategic sites increase output, larger windfall sites may reduce, and that with an up to date plan in place, speculative applications will also reduce. It is therefore unclear how the Council can substantiate an two fold uplift in windfall supply in the emerging housing trajectory, as required by paragraph 75 of the NPPF. To seek to resolve this Hallam Land would advocate for reviewing - and ultimately increasing - the number of homes included in the individual draft allocations. In the case of North Tadpole SGL, there is an opportunity to realise additional growth and to increase the number of homes delivered at land in Hallam's control, at Lower Widhill Farm. Failing this it is inevitable that Swindon will need to seek the allocation of additional sites.

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 Plan must include a requirement figure in accordance with paragraph 69 of the NPPF. The Council then must retest the extent to which the supply as proposed can meet this requirement, evidenced though a housing trajectory as required by paragraph 78 of the NPPF.



Respondent No: 522

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Daniel

Q3. Last Name West

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) David Lock Associates on behalf of Hallam Land

[REDACTED]

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

(SBC admin note: Please also see attached response.) The spatial strategy Hallam Land supports the overarching spatial approach to growth as expressed in draft policy SS1 (Swindon's Spatial Approach to Growth) which identifies the role that Strategic Growth Locations continue to play at the NEV, including positive recognition of the potential for existing allocations to be expanded, such as at North Tadpole. Whilst Hallam Land notes and supports the ambitions of 'Heart of Swindon', and the evidenced need to restore and rejuvenate Swindon Town Centre, we raise concern over the reliance placed on delivery (particularly of housing) from the Swindon Town Centre and Central Wider Growth Location supply. Policy SGL 01 - Swindon's Central Area identifies an 'ambition' to deliver up to 8,000 new homes and 6,000 new jobs in this strategic growth area. However of the 8,000 new homes, the Plan only identifies some 4,347 homes within this SGL as draft allocations, the majority of which are brownfield sites requiring broad ranging regeneration efforts. Hallam Land question the degree to which delivery at the Town Centre and Central Wider Growth Location can effectively shape the growth and change at the level identified by the draft Plan – whether the 8,000 is an ambition or a policy target, and the extent to which some 4,347 homes supply can be realistically delivered within the Plan period. A mechanism for town centre regeneration will need to be put in place. Furthermore, regeneration schemes inherently involve unpredictable and lengthy implementation processes, defined by land contamination issues, relocation of existing businesses and agreement of numerous parties. The Brunel Quarter for example, is expected to deliver some 1,000 dwellings and is comprised of a number of different SHELAA sites, in different land ownerships. Paragraph 78 of the NPPF requires strategic policies to include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. Appendix 3 to the Draft Local Plan includes a housing trajectory, with broad elements of supply for each plan year, but without clarity of which sites are planned to come forward in the early, medium and longer term. It is expected that this evidence will be provided at the next Plan stage and Hallam will be pleased to comment accordingly. Hallam Land supports the identification of SGL06 and the evidenced contribution that North Tadpole will make to meeting housing needs for Swindon. However, Hallam Land consider that the allocation could be increased, as the site has additional sustainable capacity. Our representations under draft Policy SGL06 provide further detail, and set out justification for amendment to the policy to support more effective use of land and deliver additional housing. Hallam Land propose some 450 homes are achievable and deliverable at Lower Widhill Farm and some 600 for the North Tadpole SGL cumulatively. Our Call for Sites submission also referred to the extent of land in Hallam Land control (land at Lower Widhill Farm (SHELAA reference s0030b)) and the opportunity that could be explored for additional growth through an expanded allocation boundary. Having regard to the uncertainty of delivery of a significant element of planned supply, it is not only reasonable, but necessary to proceed with a strategy that acknowledges and secures the additional growth potential of North Tadpole.

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 quantum for North Tadpole Strategy Growth Location should be amended to reflect the additional capacity potential as referred to in these representations and illustrated by the Concept Plan that is appended to Hallam Land representations for Policy SGL06, which demonstrates how a development of 450 homes could be delivered on land within Hallam Land's control, to support an allocation for some 600 homes.



Respondent No: 523

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Daniel

Q3. Last Name West

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) David Lock Associates on behalf of Hallam Land

[REDACTED]

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

(SBC admin note: Please also see attached response.) Hallam Land supports the overarching spatial approach to growth as expressed in draft policy SS2, that with reference to Policy SS1, the main focus for housing and employment growth includes contributions made by the Strategic Growth Locations, such as North Tadpole. The policy also refers to the Settlement Hierarchy, provided at Table 1. Tadpole Garden Village is included within the Urban Area settlement type (as per Figure 2: Key Diagram – Main Growth Areas), however, North Tadpole is excluded from this area and it is not included elsewhere within the settlement hierarchy at Table 1. We note that a Settlement Boundary Review paper is being prepared but is yet to be published. Hallam Land strongly recommend that this must be rectified, and either the Urban Area should be extended to include the North Tadpole proposed allocation or, having regard to the assessment of other strategic growth locations (built and emerging -South Marston and Rowborough, Lotmead) it would seem entirely consistent to include North Tadpole as a rural service centre.

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.

North Tadpole should be identified in the Settlement Hierarchy (Table 1) as either within the Urban Area or as Rural Service Centre.



Respondent No: 524

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Daniel

Q3. Last Name West

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) David Lock Associates on behalf of Hallam Land

[REDACTED]

Q12. Please set out your comments below. Please be as precise as possible.
(SBC admin note: Please also see attached response.) As a land promoter, who often takes on a master developer role in unlocking schemes through facilitating delivery and/or funding of infrastructure – alongside homes, Hallam Land raises concerns with Policy U1 as drafted. The availability of capacity across all utilities is a fundamental consideration of the wider development picture. The policy must be careful not to frustrate the planning process, with matters that have different regulatory control as part of the wider consenting and permitting of development. It is not reasonable therefore to expect proposals to demonstrate adequate water supply and sewerage infrastructure capacity off the site to serve the development. The onus is on the utilities provider to ensure there is a connection and capacity. For this reason we question the effectiveness of both bullet 1a) and bullet 4.

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.

Bullet 1a) and bullet 4 should be deleted. Bullet 10 should be updated to refer to m2 rather than m3.



Respondent No: 525

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Daniel

Q3. Last Name West

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) David Lock Associates on behalf of Hallam Land

[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

Part B – Please use a separate sheet for each representation

Name or Organisation: Hallam Land

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

Chapter

CHAPTER
11:
UTILITIES
U3: Energy
Networks

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.

As a land promoter, who often takes on a master developer role in unlocking schemes through facilitating delivery and/or funding of infrastructure – alongside homes, Hallam Land raises concerns with Policy U3 as drafted.

The availability of capacity across all utilities is a fundamental consideration of the wider development picture. The policy must be careful not to frustrate the planning process, with matters that have different regulatory control as part of the wider consenting and permitting of development.

It is not reasonable to expect proposals to demonstrate connectivity to the grid. It can lay connections/ ducting within the site to facilitate, but it cannot 'demonstrate connectivity to the grid' – that is outside the remit of an individual developer.

(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.

Seek wording amendment to reference 'as far as reasonably possible', onus should be on the provider to connect:

1. Proposals for development must ~~demonstrate facilitate~~:
a) connectivity to the national grid,
b) that grid capacity is available to support the development, and

(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.



Lower Widhill Farm

VISION DOCUMENT

OCTOBER 2025

Foreword

Hallam Land is the strategic land and planning promotion arm of the Henry Boot Group, and is a leading promoter of strategic land within the UK with a strong track record in delivering well-planned, high quality and sustainable developments.

Hallam Land is deeply involved in the growth of Swindon, including as part of the consortium delivering the new communities at the New Eastern Villages.

Hallam Land works proactively and often in partnership with local planning authorities, stakeholders and local communities to secure new people-centred developments of quality that deliver meaningful and sustained benefits to both new residents and existing local communities, through an approach that has placemaking and infrastructure certainty at its heart.



Contents

Foreword.....	ii
Swindon: Context for growth	2
Development Opportunity	6



Swindon: *Context for growth*

Hallam Land are pleased to bring forward land at Lower Widhill Farm, which has been identified in the draft Local Plan as part of North Tadpole Strategic Allocation (SGL06).

The purpose of this document is to illustrate the identified potential of the site to create an integrated new community, which benefits from its immediate relationship with Tadpole Garden Village and the amenities and facilities which have been planned and delivered and strong sustainable transport connections into Swindon town centre.

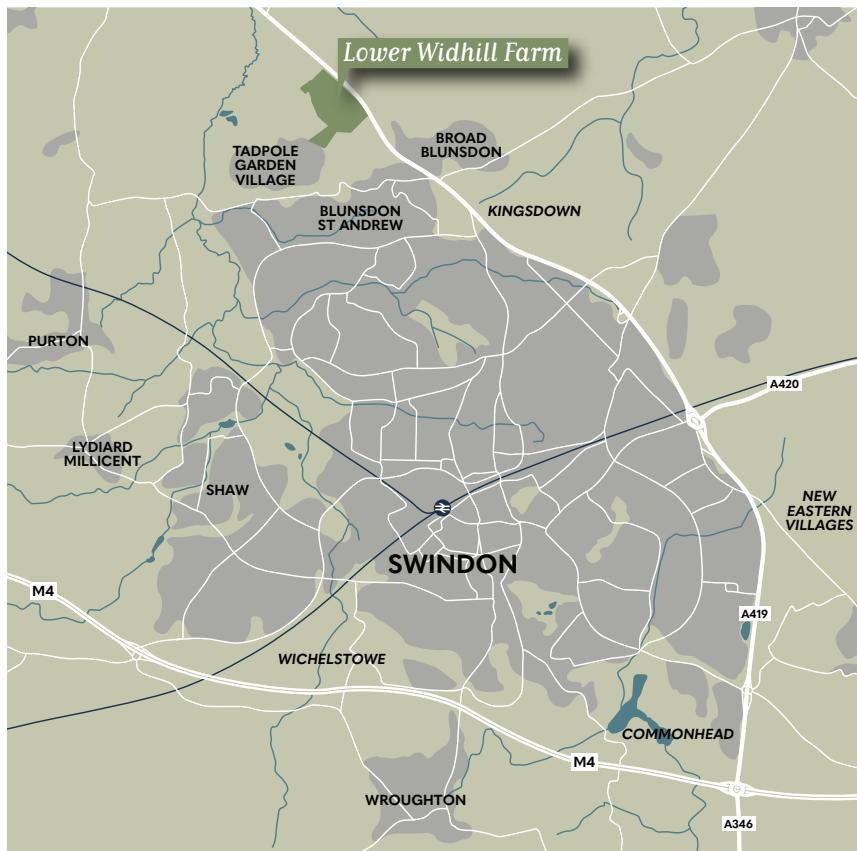
Swindon Borough Council is currently preparing a new Local Plan, the Regulation 18 Consultation Draft Local Plan sets out Council's ambition for growth to 2043. The emerging strategy for growth seeks to build on the "Heart of Swindon" plan which seeks to revitalise Swindon's town centre through urban regeneration and economic investment.

The draft Local Plan retains its focus on the strategic growth allocations that are committed through the adopted plan. In addition, it identifies opportunities to explore further growth potential at locations that are already committed and where investment has taken place to provide new homes, together with employment, community facilities and services and infrastructure.

The draft Local Plan includes strategic allocations as a combination of committed sites in the adopted Local Plan, rolled forward into the new Local Plan, and new and additional sites.

The draft Plan identifies North Tadpole as a new strategic allocation that will complement the established new community at Tadpole Garden Village and provide opportunities for additional investment in community and placemaking infrastructure.

The site is evidently capable of delivering additional capacity above that identified in the draft policy. That enhanced opportunity is presented in this document, a comprehensively planned, highly permeable development that places people first and prioritises walking, cycling and well-being with generous and biodiverse connected open spaces for play, leisure, recreation and nature.



A strategic and sustainable response

The Council, through the Local Plan evidence base and subsequent draft allocation, endorses land at Lower Widhill Farm, as a sustainable location, that has an immediate relationship with the emerging settlement pattern at Tadpole Garden Village, a new community of some 1,700 homes which secured consent in 2012.

The development at Tadpole Garden Village provides a strong anchor to growth at this northern edge of Swindon. There is an established pattern of strategic green corridors and screening provided by both formal open spaces and a series of more informal linear parks and pocket parks. This structure can help inform the green infrastructure approach to land at Lower Widhill Farm.

As part of the development of Tadpole Garden Village, new facilities have been created immediately adjacent to the allocation site along William Morris Way, including a primary school, secondary school, doctors' surgery and special educational needs school.

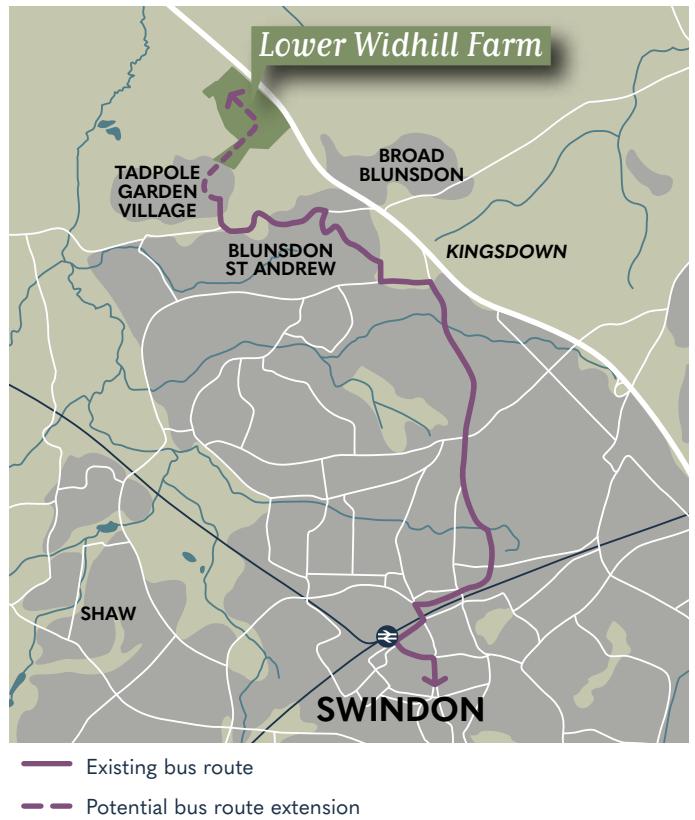
Development at Lower Widhill Farm will positively activate the northern edge of William Morris Way, creating a more connected and welcoming gateway into the new community and strengthening the sense of community anchored by these facilities. Opportunities exist to bring forward an element of retail offer that could bring vibrancy and a place for the community to gather within the public realm.



A sustainably connected new neighbourhood is an essential design principle for the site. Connections should be both local, to recently constructed schools and facilities at Tadpole Garden Village, and to Swindon town centre, which provides a much wider range of services. An extension of the number 4 bus route to Tadpole Garden Village through to the site would provide a convenient and regular bus service (currently every 20 minutes).



Tadpole Garden Village Surgery



View along William Morris Way towards Great Western Academy



Woodland belt screening the A419



View from within the site looking north towards Lower Widhill Farmhouse



Development Opportunity

The masterplan concept illustrates that new informal leisure and active travel routes could be created to access regularly used facilities located around William Morris Way and onwards to Tadpole Garden Village.

The capacity for development at Lower Widhill Farm, is expressed in the Council's SHELAA 2019 (site reference 0030). The draft allocation presents a limited opportunity at Lower Widhill Farm, for some 350 homes as part of a wider allocation of 513 homes.

Hallam Land controls sufficient land at Lower Widhill Farm to deliver a comprehensively planned scheme of some 450 homes (supporting a total allocation of some 600 homes).

This optimal quantum carefully balances the opportunity to focus additional growth at a committed strategic growth location, creates additional patronage to support bus services, and better supports the delivery of local centre uses that complement the community and education uses that are proximate to the site, and, in addition provides strong and enduring landscape treatment at the urban area transition.

In summary, Hallam Land control sufficient land to deliver:

- up to 450 new homes;
- opportunity for a local centre, with an element of local retail to complement existing investment in placemaking and community infrastructure at Tadpole Garden Village;
- delivery of a resilient and multifunctional landscape and open space resource that could include habitat restoration, woodland planting schemes to provide a robust landscaped edge to the development, and achieve biodiversity enhancement and net gain; and
- formal open space provision which could include allotments, an area for sports pitches and opportunities for play.





BLUNSDON
ST. ANDREW

TADPOLE
GARDEN
VILLAGE

