



Respondent No: 323

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

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

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Enhance protections for the green fields mentioned in the paragraph above and ensure that a bigger, better green lung is created for residents in north east Swindon. Preserve the rural character of Kingsdown lane. Reject any development at Catsbrain farm and on fields East of Stanton park. Improve walking connections between Stratton Wood and Stanton park.

Representation Form

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

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

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

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This form has two parts –

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

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

Part A

1. Personal Details*

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

Agent's Details (if applicable)

Title	<input type="text" value="Mr."/>	<input type="text"/>
First Name	<input type="text" value="Marco"/>	<input type="text"/>
Last Name	<input type="text" value="Di Pinto"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text" value="██████████"/>	<input type="text"/>
Line 2	<input type="text" value="██████████"/>	<input type="text"/>
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Post Code	<input type="text" value="████"/>	<input type="text"/>
Telephone Number	<input type="text" value="████████"/>	<input type="text"/>
E-mail Address	<input type="text" value="████████████████████"/>	<input type="text"/>

2. Request for further notification

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

Yes ☒ No ☐

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

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

Council e-newsletter	<input checked="" type="checkbox"/>	Other social media	<input type="checkbox"/>	Local newspaper (printed)	<input type="checkbox"/>	Don't remember	<input type="checkbox"/>
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Other (please specify):

Part B – Please use a separate sheet for each representation

Name or Organisation:

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

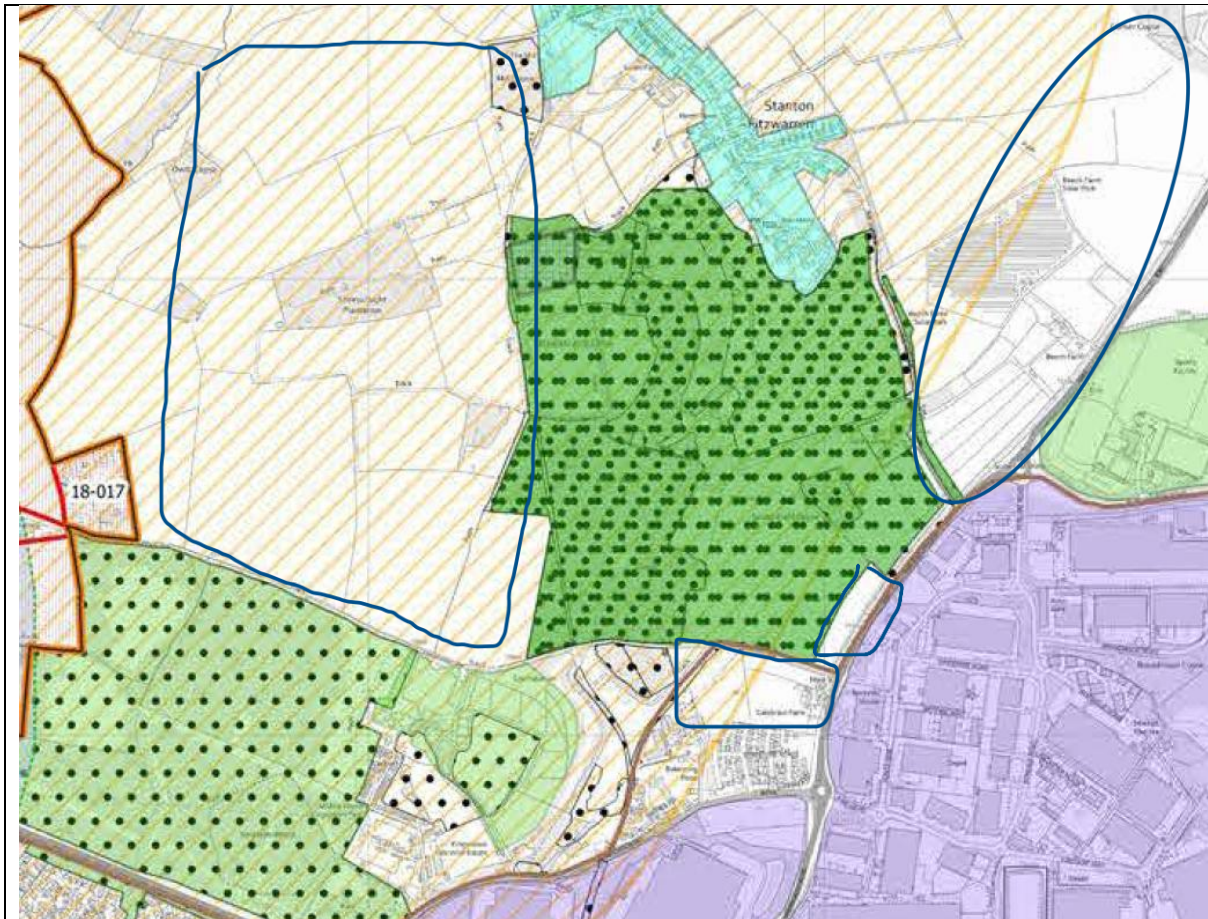
Chapter		Policies Map	01.02 policies map borough, green infrastructure map	Evidence base document e.g. the Sustainability Appraisal	Green infrastructure strategy
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If selecting chapter, please note policy number and paragraph number if applicable.

4. COMMENTS

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

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

5. CHANGES

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SBC admin note: Please also see attached response for image. The development at Kingsdown needs to feature a provision for a new GP surgery as well as school provisions and local convenience provisions. The non-coalescence zone between the Kingsdown development and Blunsdon should be protected from any development and remain as green fields or create a new park there. A bridge over the A419 into groundwell should be built before any further housing is allowed. Developers must not get away with building houses and then avoiding building a new bridge connection over the A419 which would cause massive traffic congestion on the B4019 and B4534. The amenity of Kingsdown lane needs to be preserved. The fields north of Stratton Wood and West of Stanton park, and the fields East of Stratton Wood and Catsbrain farm need to be protected from development (please refer to my previous submission regarding green spaces). [Image]

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Representation Form

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Other (please specify):

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Name or Organisation:

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

Chapter	SGL 03 Kingsdown	Policies Map	01.02 policies map borough,	Evidence base document e.g. the Sustainability Appraisal	01.01 local plan
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4. COMMENTS

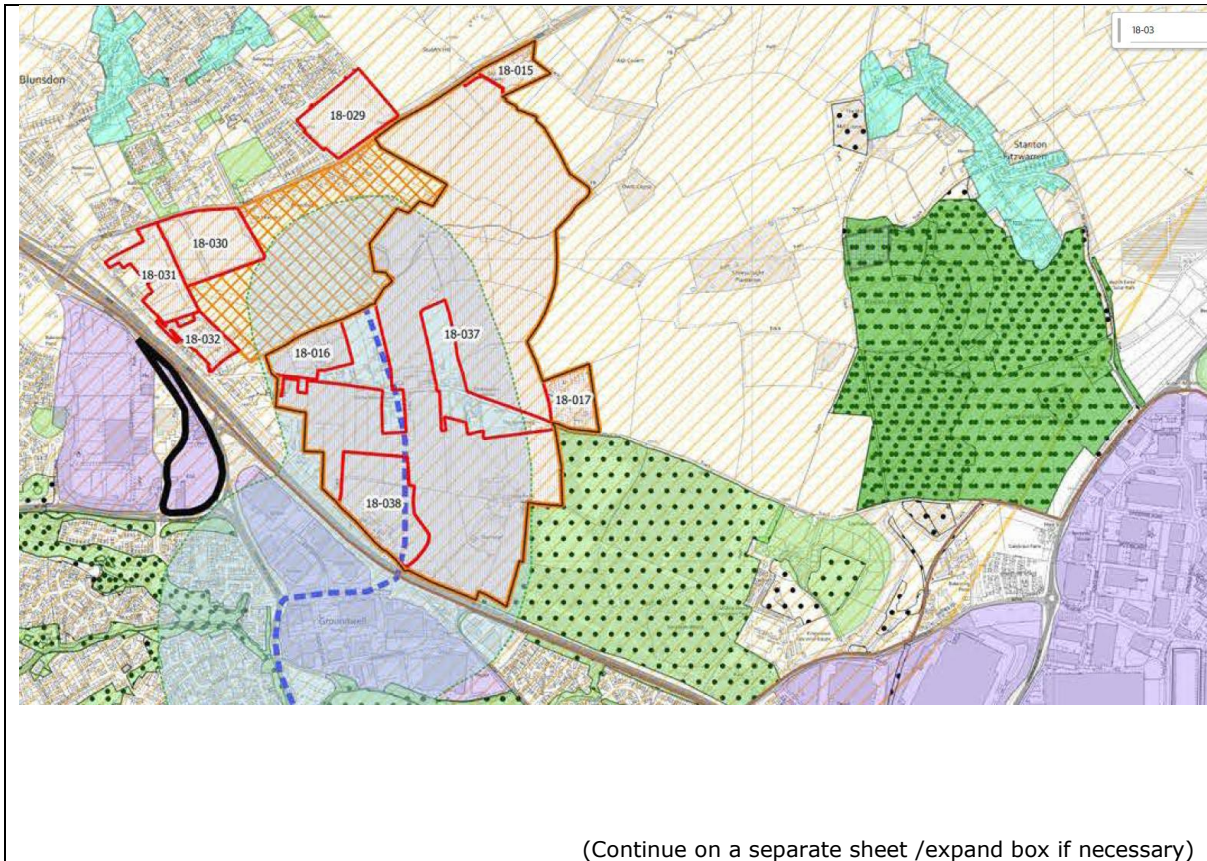
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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- Q1. **Title** not answered
- Q2. **First Name** David
- Q3. **Last Name** Hutchinson
- Q4. **Job Title (where relevant)** Executive Direction Planning
- Q5. **Organisation (where relevant)** Pegasus Group on behalf of Sarah Griffiths of Catesby Estates

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Representations in respect of the Swindon Borough Council Local Plan

Publication Stage (Regulation 18)

Land at Stubbs Hill Farm, Swindon

On behalf of Catesby Estates

Date: October 2025 | Pegasus Ref: P25-0736



Document Management.

Version	Date	Author	Checked/ Approved by:	Reason for revision
	09-10-2025	AC/DH	DH	



Contents.

1. Introduction.....	1
2. Housing Need and Proposed Supply	2
3. Land at Stubbs Hill Farm, Blunsdon (SLAA reference s0537)	11
4. Conclusion.....	20

1. Introduction

- 1.1. These representations are submitted on behalf of Catesby Estates Ltd in response to the Regulation 18 Consultation of Swindon Borough Council concerning the Draft Local Plan 2023-2043.
- 1.2. For context, Land at Stubbs Hill Farm was promoted through a previous Call for Sites submission. The site is not currently proposed for allocation within the draft Local Plan and is listed within Annexe 7: Externally submitted sites not considered suitable to the Strategic Housing and Economic Land Availability Assessment (SHELAA) 2025. It is an 18.9ha site and referred to in the SHELAA as site ref. s0537.
- 1.3. The site also considered within the SHELAA 2025 under reference s0554 which forms a slightly larger site (20.66ha) and incorporates both s0537 and site s0536 (1.93ha), with the latter site including a dwelling and a number of agricultural barns alongside the greenfield land in question (s0537). For the purposes of these representations, the site referenced s0537 reflects the boundary of the Concept Plan (re: Ai01). However, this information is relevant to site s0554 as considered within the SHELAA 2025.
- 1.4. In summary the site provides for a potential further addition to the land that is already allocated for strategic scale residential led mixed use development at Kingsdown.
- 1.5. The draft Local Plan proposes to meet a housing requirement of 1,205 homes per year, which equates to 24,100 homes over the plan period, via Policy SP2. Although not all sites are allocated via a specific policy other than SP2, the supporting text to the policy refers to new housing allocations (8,344 dwellings) and these are set out at Appendix 1.

The Structure of these Representations

- 1.6. These representations will firstly highlight why the proposed allocations are insufficient for the Council to meet their housing requirement and will result in shortfalls over the plan period within **Section 2** before explaining why the subject site (ref. s0537) is appropriate for allocation within **Section 3**. These discussions will inform an overall summary and conclusion at **Section 4**.

2. Housing Need and Proposed Supply

- 2.1. Draft Policy SP2 (Homes for the Community) sets out that the Council's housing requirements as per the most up to date standard method is 1,205 homes per year which equates to 24,100 new homes over the plan period to 2043. The supporting text to the policy at Paragraphs 6.4 – 6.8 sets that to meet this figure, the Local Plan takes into account 831 net completions (2023/24) and 12,767 planning permissions granted.
- 2.2. This leaves a need for 10,502 new permissions over the plan period, with the plan intending to address this through rolling over strategic site parcels without planning permission from the 2026 Local Plan (totaling 3,498 homes) and allocating new sites, with a total current indicative housing yield of around 8,344 new homes.

Plan Period

- 2.3. The emerging Local Plan proposes a plan period of 1st April 2023 to 31st March 2043.
- 2.4. The latest Local Development Scheme of the LPA suggests that the emerging Local Plan will be adopted in December 2027, such that the emerging Local Plan would provide for 15 years and 4 months from the point of adoption.
- 2.5. Whilst this would meet the minimum requirement of paragraph 22 of the NPPF, it does not give much room for slippage.
- 2.6. It would therefore be recommended that the LPA consider extending the plan period by a year in order to provide greater comfort that the emerging Local Plan will accord with paragraph 22 of the NPPF at the point of adoption.
- 2.7. Notwithstanding the above, the remainder of this section consider the proposed housing requirement over the period 2023–43.

The Minimum Local Housing Need

- 2.8. Policy SP2 of the emerging Local Plan identifies that the standard method generates a minimum LHN for 1,205 homes per annum.
- 2.9. However, as recognised in the PPG (2a-008), the results of the standard method change as new inputs become available, and the emerging Local Plan will need to be kept under review in order to respond to this.
- 2.10. The Local Development Scheme proposes that the emerging Local Plan will be submitted for examination in autumn 2026, by which time new affordability ratios will have been published (in circa March 2026) and new information on the housing stock will have been published (in circa May 2026). This may necessitate amendments to the housing requirement and

consequently the supply in order to ensure compliance with paragraphs 11, 23, 62 and 72 of the NPPF.

- 2.11. In light of the above, the emerging Local Plan should therefore be prepared with sufficient flexibility to accommodate the as yet unknown minimum LHN which will exist at the point of submission.

Unmet Needs of Neighbouring LPAs

- 2.12. The emerging Local Plans in all three neighbouring LPAs (Cotswold District Council, Vale Of White Horse District Council and Wiltshire Council) fall substantially short of meeting current minimum local housing needs, and as such the LPA will need to engage with these LPAs to determine the extent of the unmet need and how this can best be addressed. The LPA will also need to prepare and agree Statements of Common Ground to reflect this as required by paragraph 28 of the NPPF in order to demonstrate that the duty to cooperate has been complied with.
- 2.13. As Swindon acts as an economic hub for the surrounding sub-region, it is likely that a significant proportion of the unmet needs of neighbouring areas could be sustainably met within the Borough.
- 2.14. It is therefore likely that the emerging Local Plan will be required to identify a greater housing requirement as well as a greater number of sites in order to address the unmet needs of neighbouring areas to accord with paragraphs 11, 36 and 62 of the NPPF.

Economic Needs

- 2.15. As recognised in the paragraph 1.2 of the Employment Needs and Land Supply Study, March 2025 (ENLSS), Swindon has huge economic potential and the emerging Local Plan seeks to capitalise on this.
- 2.16. However, this brings with it certain challenges, including for example, skills and labour shortages and high-levels of in-commuting as has occurred in recent times as acknowledged in paragraph 7.46 of the ENLSS. It is therefore essential that a sufficient number of homes are planned for and provided to ensure that these factors do not act as a barrier to planned economic growth as set out in paragraph 86c of the NPPF.
- 2.17. The LPA will need to assess whether the amount of housing proposed is sufficient to support the proposed economic growth as required by paragraph 86 of the NPPF. Once this necessary work has been undertaken, the proposed housing requirement will need to be reviewed to ensure that it does not constrain the planned economic growth.

Affordable Housing Needs

- 2.18. Regrettably the LHNA assesses only part of the need for affordable housing, as it omits any consideration of the need for other forms of affordable home ownership such as discounted market sales. As a consequence, the need for affordable housing will be far greater than suggested in the LHNA. The need for affordable home ownership homes typically represents a significant proportion of the overall need for affordable housing.
- 2.19. In the absence of a full assessment of the need for affordable housing, it is not possible to determine precisely how many homes would be required to be delivered in order to meet the full need for affordable housing.
- 2.20. Nevertheless, even without this evidence, it is clear that the emerging Local Plan will fall substantially short of meeting the need for affordable housing.
- 2.21. As illustrated in the table below, according to the MHCLG's Live Tables, 3,797 affordable homes have been delivered in the period 2006–24 or 211 per annum, of which 1,361 were provided as other affordable home ownership homes leaving 2,436 or 135 per annum that were provided as social rent, affordable rent or shared ownership. Over the same period a total of 833 affordable homes were lost as a result of Right to Buy sales, meaning that there has been a net increase of 1,603 social rent, affordable rent or shared ownership homes over the period 2006–24, or 89 per annum.
- 2.22. During this period, a total of 18,702 homes were delivered in total, such that only 8.6% of the total number of homes delivered resulted in a net addition to the number of affordable rent or shared ownership homes.
- 2.23. The emerging Local Plan proposes a requirement of 24,100 homes. Assuming that on average, circa 8.6% of this provides for net additional social rent, affordable rent or shared ownership homes in accordance with historic trends, the emerging Local Plan would provide for 2,066 such homes in response to the identified need for 7,171 such homes as identified in Figure 3 of the emerging Local Plan and Figure 1.2 of the Overall Housing Need Update Annex.

Table – affordable housing delivery

Year	Total homes	Total affordable homes	Of which other affordable home ownership homes	Right to Buy losses	Net additional social rent, affordable rent or shared ownership	% of total
2006-07	2327	236	-198	-73	-35	-1.5%
2007-08	2007	491	-318	-67	106	5.3%
2008-09	1032	331	-122	-12	197	19.1%
2009-10	944	586	-250	-16	320	33.9%
2010-11	844	292	-158	-4	130	15.4%
2011-12	847	275	-99	-13	163	19.2%
2012-13	558	173	-103	-40	30	5.4%
2013-14	554	177	-36	-67	74	13.4%
2014-15	645	34	-4	-54	-24	-3.7%
2015-16	1400	57	0	-55	2	0.1%
2016-17	1657	130	0	-74	56	3.4%
2017-18	772	172	0	-59	113	14.6%
2018-19	1082	148	0	-66	82	7.6%
2019-20	681	190	-16	-52	122	17.9%
2020-21	525	126	0	-43	83	15.8%
2021-22	1099	104	0	-36	68	6.2%
2022-23	1008	109	-56	-48	5	0.5%
2023-24	720	166	-1	-54	111	15.4%
	18702	3797	-1361	-833	1603	8.6%

- 2.24. Indeed, in order to meet the full need for 7,171 social rent, affordable rent and shared ownership homes, it would be necessary for 29.8% of the total number of homes provided to be in these tenures, which would be unrealistic and unprecedented in all but one year as set out in the table above.
- 2.25. As such, even without any regard being paid to the need for other forms of affordable home ownership housing contrary to the requirements of the NPPF, the emerging Local Plan would fall substantially short of meeting the full need for affordable housing.
- 2.26. It is therefore apparent that the emerging Local Plan will fall short of meeting affordable housing needs, such that the LPA will need to consider whether a greater number of homes should be planned for in order to better respond to this need as set out in the PPG (2a-024). There is no evidence that this has been considered in support of the emerging Local Plan and as such this represents yet another inconsistency with national policy and guidance, which once resolved is likely to justify a greater housing requirement.

The Housing Requirement

- 2.27. There is no evidence or suggestion that any footnote 7 policy provides a strong reason to restrict the overall level of growth or that the adverse impacts of doing so would significantly and demonstrably outweigh the benefits (paragraph 11b of the NPPF).
- 2.28. The preceding representations demonstrate that much of the evidence required by national policy and guidance has yet to be prepared, and that the proposed housing requirement of the emerging Local Plan will need to be reviewed to respond to this evidence and to newly arising material considerations prior to submission. In particular:
- a. The plan period should either be extended or at least continually reviewed to ensure that this provides a minimum 15-year plan period from the point of adoption as required by paragraph 22 of the NPPF.
 - b. Any changes to the results of the standard method prior to submission will need to be responded to in accordance with the PPG (2a-08).
 - c. The LPA will need to constructively engage with neighbouring LPAs to identify the full extent of unmet housing needs, how these are proposed to be addressed and depending on the results of this work, increase the housing requirement to respond as appropriate in accordance with paragraphs 11b, 62 and 69 of the NPPF.
 - d. Prepare statements of common ground to reflect this as required by paragraph 28 of the NPPF, and as is necessary to demonstrate that the duty to cooperate has been complied with as set out in the PPG (61-010) and (61-029).
 - e. Prepare and publish an assessment which considers whether the level of housing proposed is sufficient to support the planned economic growth as required by paragraphs 69 and 86c of the NPPF.
 - f. Assess the need for other forms of affordable home ownership as required by the NPPF and the PPG (2a-020), which will inevitably identify a far greater need for affordable housing than is currently identified.
 - g. Regardless of the previous point, consider whether the emerging Local Plan should set a greater housing requirement to better respond to the need for affordable housing.
- 2.29. Whilst the extent of the almost inevitable increases to the housing requirement cannot currently be determined owing to the gaps in the underlying evidence, it is anticipated that these will be very significant.

The Supply of Housing

The Housing Trajectory

- 2.30. Paragraph 78 of the NPPF requires that Local Plans set out the anticipated rate of development for specific sites. However, the trajectory for the proposed allocations has not been presented in support of the emerging Local Plan to date. As such, it is not possible to consider whether the trajectory of the LPA for these individual sites and therefore the overall trajectory is accurate or realistic. Pegasus Group therefore reserves the right to submit further representations on this issue as and when the necessary evidence is made available.
- 2.31. Notwithstanding this, a few high-level issues are apparent as briefly set out below.
- 2.32. Paragraph 6.6ii of the emerging Local Plan suggests that around 8,344 homes will be delivered within the proposed plan period from new site allocations. However, Appendix 3 then suggests that in the period 2023–43, a total of 8,500 homes will arise from this source. It is therefore apparent that one or other of these figures is incorrect.
- 2.33. Furthermore, the figures provided in paragraphs 6.5 and 6.6 of the emerging Local Plan also do not align with the figures provided in the Annual Monitoring Report 2024/25 (AMR) and so will need to be updated.
- 2.34. Indeed, it can be calculated from the emerging Local Plan and the AMR that 1,723 homes were delivered from 2023–25, and that an additional 16,473 homes have planning permission (including those on adopted strategic allocations). The new site allocations proposed in the emerging Local Plan also provide the capacity to deliver an additional 8,709 homes based on the figures provided in Appendix 1 of the emerging Local Plan, of which the LPA assume 8,500 will be delivered within the plan period according to Appendix 2. Therefore, the available evidence would suggest that there is a total potential supply of 26,696 homes.
- 2.35. However, it would be unrealistic to suggest that anywhere near this level of housing will be delivered during the proposed plan period. In particular:
- a. It is inevitable that planning permissions will lapse on a proportion of sites, as recognised in paragraph 5.6 of the latest Five Year Housing Land Supply Statement which identifies that 4.8% of planning permissions expire. Whilst this is considered very conservative, this alone would reduce the supply from extant planning permissions from the 16,473 identified in the Annual Monitoring Report to 15,682.
 - b. Two of the new allocations, at Land to the north of the Station and Brunel Quarter, each provide for in excess of 1,000 homes. The Start to Finish report of Lichfields suggests that on average it takes 6.2 years from the submission of the first planning application on sites of this size until the first completion and so given that the emerging Local Plan is not anticipated to be adopted until December 2027, these sites wouldn't be expected to achieve completions until March 2034 at the earliest. Thereafter, the Start to Finish report suggests that the upper quartile delivery rate on sites of this size is 101 homes per annum,

which would mean that each of these sites would be expected to contribute of the order of 909 homes to the supply. In combination this would suggest that somewhere of the order of 1,818 of the 2,374 homes proposed at these sites would be delivered within the plan period with the remaining circa 556 delivered beyond the plan period.

- c. Similarly, the Marlowe Avenue Urban Regeneration area is proposed as an allocation for 976 homes. Based on the average lead-in times and upper quartile delivery rates, this site would be expected to contribute circa 830 homes within the plan period, with the remaining circa 146 homes beyond the end of the plan period. On this basis alone, only circa 8,000 of the 8,709 homes proposed as allocations would be delivered within the plan period, even if every proposed allocation was progressed in a timely fashion.
- d. A proportion of the proposed allocations will however inevitably not be progressed or not be progressed in a timely fashion, as we know from past experience. . In particular large strategic sites are often delayed for reasons relating to viability and infrastructure delivery. Indeed, the adopted Local Plan (adopted March 2015) includes a trajectory at Appendix 5 which assumed that 16,375 homes would be delivered on allocations over the period 2012–26¹. However, based on the known completions over the period 2012–25 as recorded in the Annual Monitoring Report and the anticipated completions for 2025/26 identified in the Five Year Housing Land Supply Statement, these sites are now anticipated to deliver only 4,993 homes in this period². This means that only 30% of the supply anticipated by the adopted Local Plan on new allocations has been forthcoming. If the same was to occur again, only 2,592 of the 8,500 homes anticipated on allocations by the LPA would be expected to be delivered.
- e. Additionally, the trajectory in the emerging Local Plan suggests that the first completions on the proposed new allocations will be achieved in 2027/28, which doesn't appear realistic given that the LPA suggest that the emerging Local Plan will not be adopted until December 2027.

2.36. If the same proportion of newly proposed allocations are delivered as has occurred with currently adopted allocations, the sites identified in the emerging Local Plan would deliver 19,997 homes (1,732 completions, 15,682 on permitted sites, and 2,592 on new allocations) and so the supply would fall substantially short of meeting even the proposed housing requirement for 24,100 homes. This underlines the importance of identifying a sufficient number of sites within the emerging Local Plan to ensure that the housing requirement can and will be met. It also underlines the need for a choice of sites, particularly small and medium sized sites which can deliver more quickly [NPPF paragraph 73].

¹ Comprising, 4,000 at Wichelstowe, 890 at Commonhead, 8,000 at the New Eastern Villages, 1,695 at Tadpole Farm, 1,650 at Kingsdown and 140 at South Marston Village brownfield expansion.

² Comprising 1,719 at Wichelstowe, 1,263 at Commonhead, 314 at the New Eastern Villages, 1,695 at Tadpole Farm and 2 at Kingsdown.

- 2.37. As set out above, it is apparent that the supply currently identified in the emerging Local Plan is not sufficient to meet even the proposed housing requirement, and as such additional allocations will need to be identified in order to provide for a sufficient supply in accordance with paragraph 72 of the NPPF.

The five-year land supply

- 2.38. Paragraph 72a of the NPPF requires that planning policies identify a supply of specific, deliverable sites for five years from the point of adoption.
- 2.39. The housing land supply position will change on a continual basis up until the point of adoption, and will be informed by amongst other things, the final plan period, the final housing requirement, and the deliverability of individual sites including the final allocations. As such, it is too early to accurately determine whether or not the emerging Local Plan will identify a five-year land supply at the point of adoption. However, this should continue to be monitored, and Pegasus Group reserves the right to respond to updated information as and when this becomes available.
- 2.40. However, on the basis of the currently available information, it would appear that a five-year land supply will not be able to be demonstrated at the anticipated point of adoption in 2027. Indeed:
- a. Over the period 2023–25, there have been 1,723 completions according to the AMR and emerging Local Plan, and based on the trajectory in the latest Five Year Housing Land Supply Statement, there are anticipated to be a further 2,880 completions in the period 2025–27. This would suggest that there will have been 4,603 completions in response to the requirement for 4,820 homes over this period, leaving a shortfall of 217 homes.
 - b. In addition to the requirement for 6,025 homes over the period 2027–32, this provides for a requirement for 6,242 homes.
 - c. With the application of a 5% buffer this will provide for a minimum requirement for 6,554 homes over the period 2027–32.
 - d. The latest Five Year Housing Land Supply Statement suggests that 3,339 homes will be delivered from committed sites in the period 2027–30, and the only information on such sites for the period 2030–32 is provided in the trajectory in the emerging Local Plan which suggests that a further 2,949 homes will arise from this source, providing for a total supply of 6,288 homes from committed sites.
 - e. Assuming that planning applications are submitted on each of the proposed new allocations at the time of adoption, and the average lead-in time and upper quartile delivery rates identified in the Start to Finish report are achieved on every site, these would also deliver a total of 125 homes within the period 2027–32.

- f. This would suggest that even assuming that all of the committed sites deliver as anticipated by the LPA and that applications are submitted on every proposed new allocation at the point of adoption, there would be a supply of the order of 6,413 homes, which would be insufficient to meet the minimum requirement for 6,554 homes.

2.41. Whilst this should continue to be monitored, as the position will change on an ongoing basis, the available evidence therefore suggests that the LPA will need to identify additional allocations in order to provide for a five-year land supply at the point of adoption. We consider that this should in particular include more small and medium sized sites as per NPPF paragraph 73 to reduce too much reliance on large strategic sites.

Summary

2.42. The preceding representations demonstrate that some of the evidence required by national policy and guidance has yet to be prepared. In particular no trajectory has been provided for each of the proposed sites contrary to the requirements of Paragraph 78 of the NPPF and the trajectory is based on out of date information.

2.43. Notwithstanding this, and based on the partial evidence that is available, it would appear that the emerging Local Plan does not identify a sufficient supply of developable sites sufficient to meet the housing requirement over the plan period, not does it identify a sufficient supply of deliverable sites to provide for a minimum five-year housing land supply at the point of adoption as required by paragraph 72a of the NPPF.

2.44. As such, based on the currently available evidence, it would appear that a significant number of additional sites will need to be identified to meet even the proposed minimum housing requirement. If the housing requirement needs to be increased, then the need to identify additional sites will be even greater.

3. Land at Stubbs Hill Farm, Blunsdon (SLAA reference s0537)

- 3.1. As set out in the first section above, our clients have been promoting this site through the draft Local Plan,
- 3.2. The Call for Sites submission and these representations, concern an 18.9ha site that is shown on the Indicative Concept Plan included at Appendix 1 (ref. Ai01). It covers the area referenced as s0537 in the Strategic Housing and Economic Land Availability Assessment (SHLAA) 2025 being undertaken by Swindon Borough Council as part of the Local Plan process. As set out above, the site is also considered within the 2023 SHELAA under reference s0554 which forms a slightly larger site (20.66ha) and incorporates site s0536 (1.93ha), which includes a dwelling and a number of agricultural barns alongside the greenfield land in question amounting to c.20.66ha. For the purposes of these representations, the site referenced s0537 reflects the boundary of the Concept Plan (re: Ai01). The indicative Concept plan illustrates how the site could come forward as part of an extension to the wider Kingsdown strategic allocation. Masterplanning exercises indicate the site can achieve up to 164 dwellings at a density of 30 dwellings per hectare.

Site Location and Description

- 3.3. The site in question is located to the south east of the village of Broad Blunsdon which lies within 0.5km of the northern built-up edge of Swindon.
- 3.4. However, the site is located within an area that is set to be the subject of substantial change over the plan period with the delivery of the Kingsdown allocation (which represents a strategic urban extension to Swindon).
- 3.5. That is the context within which these representations must be considered (not only in terms of location, development footprint and landscape impact but also future accessibility to services and facilities that will be delivered as part of the strategic allocation). The LPA is already considering extensions to the existing Kingsdown allocation and this includes the land immediately to the west (site '18-105' – SHELAA Ref: s0536 for 29 dwellings as part of a redevelopment of the Stubbs Hill Farm complex).
- 3.6. The subject site itself extends to 18.9 ha and sits to the south of the B4019 B Road also known as 'Broad Brush' and comprises approximately 5 fields that are currently in both agricultural and pastoral use. The eastern parcel is separated from the rest of the site by a wooded area called Ash Covert which runs south east in a S shape, with the wider site being lined by hedgerows.
- 3.7. The site does not include any land which is subject to any statutory landscape area such as an area of National Landscape (previously AONB) for example.

- 3.8. The site sits within the North Meadows SAC Zone of Influence and is approximately 907m west of the Stanton Country Park and Local Nature Reserve (EN4), but there are no ecological designations which directly affect the site.
- 3.9. The Environment Agency's flood zone mapping shows that the site lies within Flood Zone 1 (lowest probability of flooding) and is therefore suitable in terms of fluvial flood risk. Surface water runoff can be sustainably managed and disposed of using SuDS techniques.
- 3.10. The site is not in an Air Quality Management Area.
- 3.11. There are no Listed Buildings in direct proximity of the site, with neither Stubbs Lane Farmhouse nor Forked Elm Farm being of heritage value. A Grade II Listed Milestone sits on the B4019 at the north eastern periphery of the site next to Forked Elm farm but will not be impacted by any development.
- 3.12. Two Grade II Listed Buildings are located at Upper Burytown Farmhouse c.545m north east of the proposal site. The site is not in an Archaeological Priority Area and no conservation areas are in close proximity. Lower Blunsdon Conservation area is 988m to the west, with Stanton Fitzwarren Conservation area to the east, at its closest point being 665m. The Scheduled Monument Hillfort and lynchets on Castle Hill lies c.568m northeast of the site.
- 3.13. There are a number of tree preservation orders, including a G3 group order (Conservation Reference 2018-05) relating to all trees in the tree belt which touches the southeastern point of the site. There are also two Ash Trees within the site (T8, T9) close to the south western boundary which are protected by Tree Preservation Orders with any works required to be undertaken to form part of an application.

Other Development Proposals in the immediate surrounding area

- 3.14. As already noted, the most significant development will be the "New Community" known as "Kingsdown." The emerging Regulation 18 Local Draft Plan now allocates the area as a Strategic Growth Location (SGC 03). The LPA has already resolved to grant outline planning permission for a mixed-use scheme including 1,552 dwellings. The emerging Local Plan is proposing to increase the allocation to 1,847 homes over the Plan period as explained below.
- 3.15. There is a live planning application for 100no. dwellings on land to the east of Sams Lane (Ref: S/OUT/19/1267) which the LPA resolved to approve in September 2025.
- 3.16. There is a live application on the land located north west of the Site (beyond the B4019). Originally an Outline Planning Application was submitted in January 2020 for up to 200 dwellings. A recent amendment to the application now proposes (up to) 150 dwellings. Progress on this application stalled shortly after submission in 2020 for reasons mainly relating to highway capacity at the Cold Harbour junction on the A419. However, mitigation solutions have now been identified which now enable sites at Blunsdon to come forward.

- 3.17. The above schemes will significantly change the immediate context within which the subject site sits.

The findings of the SHELAA

- 3.18. Swindon Borough Council has undertaken a Strategic Housing and Economic Land Availability Assessment (SHELAA) which has served to inform the draft allocation Appendix 1 to the draft Local Plan. It includes an assessment of the subject site.
- 3.19. The SHELAA directly assesses the total subject site area at 18.9ha (considered within both SHELAA sites s0537 and s0553); which was originally submitted under a previous Call for Sites submission in 2023 by L&Q Estates, now Catesby Estates. The note on suitability states:-

“Site currently located outside of settlement boundary but in close proximity to Kingsdown strategic site. Site covers smaller parcel s0536 which includes a dwellings and agricultural barns. Remainder of site rural greenfield with strong treeline dividing the site in half. Significant concerns related to landscape with development breaching treeline being particularly incongruous.” (our emphasis)

- 3.20. The previous Call for Sites submission (2025) and data put forward for the site was in respect of a higher yielding scheme with an estimated capacity of the site originally submitted being circa 245 dwellings.
- 3.21. The RAG analysis scores the site as Red on Landscape considerations, Green for Heritage and Amber for Archaeology, Ecology, Regeneration and Location.
- 3.22. However, this quantum of units envisaged the delivery of housing on the field to the east of the tree band know as Ash Covert. Housing on this field is now no longer being promoted and has been omitted. It is now proposed as public open space / green infrastructure following analysis and input from Landscape Architects at Pegasus (as explained in further detail below).
- 3.23. In respect of the location of the site outside the settlement boundary, this is of limited consequence when it is inevitable that the Local Plan will need to release such sites in order to meet the Council's housing needs and is indeed the case with the draft allocations currently proposed. Kingsdown is itself, a predominantly greenfield allocation.
- 3.24. The location of the site and its context in respect of both Archaeological and Ecological designations does not warrant it being excluded from consideration in terms of the site being a suitable location for additional residential development. Any potential impacts in this regard can be resolved through design or mitigation approaches as part of the planning process.

3.25. We envisage no harm to the heritage significance of either Broad Blunsdon or Stanton Fitzwarren Conservation Area or the Listed assets at Upper Burytown Farm.

3.26. Furthermore, given the distance to the Stanton Country Park and Local Nature reserve, any impact to these should be relatively minimal with opportunity to ameliorate any impact which may be present. Additionally, whilst the site sits within the North Meadows SAC Zone of Influence, potential impact on the SAC can be addressed by way of avoidance/mitigation measures set out in the North Meadows and Clattinger Farm Special Area of Conservation Interim Recreation Mitigation Strategy (2023–2028) or any superseding strategies which may be published alongside the emerging local plan

3.27. In respect to Landscape matters, our comments are as follows;

Landscape

3.28. Whilst the 'Red' rating within the SHELAA is acknowledged, as per the attached Indicative Concept Plan (ref. Ai01) no development would be proposed to the east of the wooded area known as Ash Covert and as such this would provide containment and be a significant natural and well established barrier in respect to direct views into the residential built area of the site from the east.

3.29. Ash Covert dissects the site at c. 115 m AOD and then descends towards the aforementioned watercourse. This woodland forms a key feature within the site and controls views out towards the surrounding countryside.

3.30. Views from within the site are generally localised and contained by the internal woodland Ash Covert, rising land to the south, and roadside vegetation along the B4019. The neighbouring Stubbs Hill Farm is visible from within the site with views of dwellings along Kingsdown Lane visible in the distance

3.31. Whilst Stubbs Hill Farm is visible from within the site., the LPA is proposing to bring the site forward for residential development under draft allocation site '18-105' (SHELAA Ref: s0536) which would further change the immediate context of the subject site.

3.32. With regards to the development potential of the site when considering landscape matters;

- a. The Site benefits from a sense of visual enclosure and separation from the surrounding countryside (provided by a mix of Site boundary vegetation and, the linear vegetation alongside local roads) and is characterised by limited inter-visibility with the adjacent landscape.
- b. The proposed built form can be set back from the Site boundaries.
- c. Vegetation along the B4019 provides screening and the site does not appear to have any visual relationship with the landscape to the north or the village of Broad Blunsdon.

- d. Views from within the site are curtailed by the rising landform to the south and Ash Covert
- e. Public access within the surrounding countryside is limited to two PRoW routes, but restricted reciprocal views are likely to be gained from the higher ground as one travels between Kingsdown Lane and the B4019 between Forked Elm Farm and Stanton Fitzwarren. Views from Public Footpath BL8 at Forked Elm Farm include the site's eastern most field where no development is proposed.
- f. Retained and strengthened boundary vegetation will provide substantial visual containment and restricts views of the Proposed Development from the surrounding public highways and PRoWs.

3.33. The attached Indicative Concept Plan (ref. Ai01) demonstrates how the site could be developed in conjunction with Kingsdown and Stubbs Hill as part of a well considered and integrated extension to the wider allocation(s). From a landscape perspective the Concept Plan is informed by the following considerations:-

- a. Proposed built form set out on the north east of Ash Covert which seeks to benefit from the screening provided by the wider undulating landform at c. 125 m – 130 m AOD southwest of the site.
- b. Proposed two groupings for the built form: one which runs adjacent between the Stubbs Hill Farm draft allocation and Fork Elm Farm creating a natural extension to the allocation and a natural infill connecting to the built form of Fork Elm Farm. The second grouping in the south western area of the site abutting the Kingsdown N5 allocation and screened to the east by Ash Covert
- c. A proposal for green spaces/networks located between the proposed development parcels helping to integrate the scheme with wider green infrastructure.
- d. The parcel on the east side of Ash Covert being retained as undeveloped public open space and a biodiversity enhancement area, allowing a transition to the wider agricultural landscape to the east.

3.34. The Proposed Development, in the context of the new residential neighbourhood planned at Kingsdown N5 (Pending Planning Application S/OUT/17/1821) combined with Stubbs Farm (draft Allocation 18-105 /SHELAA Ref: S0536) and the Sams Lane application to the north which benefits from a resolution to grant (S/OUT/20/0096) illustrate that the proposal would form a logical extension to the N5 Kingsdown Strategic Growth Location.

3.35. Overall the Indicative Concept Plan (ref. Ai01) submitted as part of these representations for the Regulation 18 consultation and 2025 Call for Site exercise has been designed in such a way to ensure they comply with the relevant policies on both a National and Local level and policies relating to landscape character and the need to protect and enhance local landscape

features and improve biodiversity. In light of this further information the 'Red' rating for landscape is disputed and should be revisited. At the very least the site should be Amber in landscape terms.

- 3.36. Landscape effects of the development, which are similar to the development of any greenfield site, are limited with the site being contained by existing field boundary and tree vegetation and significant woodland buffering to the east of the built form. The setbacks proposed allow for the retention and enhancement of this vegetation which provide a robust and strong landscape framework with strong visual containment.
- 3.37. As such, it is considered that the allocation of the site will not result in any significant landscape harm and therefore, the 'red' rating within the SHELAA is unjustified and as such should reflect a green or at a minimum, an amber rating within the SHELAA

Traffic and Transportation

Major Transport and Highways Measures for the Main N5 Kingsdown Allocation (SGL 03)

- 3.38. Highways improvements to increase capacity in road infrastructure is required to be installed as a precursor to the main Kingsdown scheme coming forward. As set out below, there is an initial element of capacity of 375 dwellings for the wider Blunsdon area as well as approximately 450 dwellings which can be delivered in Kingsdown in the interim prior to delivery of the main infrastructure requirements. These are set out below for clarity;

Main Kingsdown Allocation (SGL 03)

- New A419 bridge for vehicle, pedestrian, and cyclist access to 1,552 homes, school, nursery, and local centre.
- Cold Harbour Junction upgrade (reconfiguration and signals).
- SCOOT signal system from Cold Harbour to A4198 Thamesdown Drive/Salzgitter Drive.
- B4019 footway and on-site pedestrian/cycle paths.
- Improved bus services with new stops/routes.

Timing and Phasing:

- **Early Capacity (450 Homes):** Cold Harbour upgrade and SCOOT signals completed by 2027, allowing 450 homes to be occupied.
- **Main Development (1,102+ Homes):** A419 bridge completed by 2028 (starts late 2025/early 2026, takes 18–24 months), enabling full build-out.

- Planning approvals and legal agreement finalized 2025–2026; early works (e.g., B4019 footway) planned start 2025–2026.

Early Capacity (375 Dwellings in Blunsdon Area)

- Lady Lane (B4534) widening between Blunsdon bridge and A419 northbound slip roads, required before construction starts.
- Cold Harbour Junction upgrade and SCOOT signals (if not done by Kingsdown).
- B4019 footway and on-site pedestrian/cycle paths.
- Enhanced bus services with new stops/routes.

Timing and Phasing:

- **375 Homes:** Lady Lane widening, Cold Harbour upgrade, and SCOOT signals completed by 2027 (6–12 months, starting 2026), allowing occupation from 2027.
- Planning approvals finalized 2025–2026 via legal agreement; A419 bridge (2028) supports future growth.

- 3.39. These measures use existing road capacity, with the A419 bridge (2027–2028) supporting further growth up to 2043.
- 3.40. In summary, there are no technical constraints that should lead to a conclusion that the site is not appropriate for a housing allocation within the plan period on highways grounds.
- 3.41. As set out in the preceding section, a significant number of additional sites will need to be identified to even meet the proposed minimum housing requirement and the subject site is one that is appropriate for allocation to enable the LPA to meet their requirements within the plan period.

Kingsdown Strategic Growth Location 03: New Sites

- 3.42. As noted earlier, the LPA is already proposing to allocate other land as small and medium sized extensions to the wider Kingsdown allocation. Those sites include:-
- Stubbs Hill Farm (18–015) (SHELAA Ref: s0536) – 29 dwellings
 - Land North of Kingsdown Lane (18–016) (SHELAA Ref: s0375) – 77 dwellings
 - Kingsdown Lane Nursery (18–017) (SHELAA Ref: s0380) – 64 dwellings
 - Kingsdown (18–037) (SHELAA Ref: s0108) – 1,552 dwellings

- Kingsdown (turnpike road) (18-038) (SHELAA Ref: s0107 and s0107b) – 125 dwellings

3.43. The Kingsdown allocation (SGL 03) is now proposed to deliver 1,847 Dwellings which is an increase of 322 dwellings from the original 1,552 homes that the LPA has resolved to approve following outline application ref. S/OUT/17/1821. It would also deliver supporting infrastructure in the form of:-

- New mixed use local centre including retail, health and community uses
- Three-form primary school – to be completed by 450th occupation
- Children’s Nursery
- Allotments
- Public Open Space
- Community Orchards
- Eight Children’s Play Areas
- Trim Trails
- Sports Hub – including a pavilion and pitches
- Extension of Stanton Country Park and enhancement of Stratton Woods
- Significant supporting transport infrastructure.

3.44. As with the other suggested additions to Kingsdown and as illustrated on the attached Indicative Concept Plan, the subject site could assimilate well with the wider Kingsdown Strategic Growth Location, its supporting infrastructure and other proposed/committed development.

3.45. Whilst the site is available now, we envisage that it would come forward later in the plan period as one of the later phases at Kingsdown. The wider site will undoubtedly come forward through phased development over the Local Plan period. The delivery of the subject site is expected to follow the delivery of highways infrastructure required to resolve capacity issues (A419 bridge), alongside community infrastructure set out in this document, enabling the proposed site to come forward. However, if required, and subject to traffic mitigation being provided, the location of the site is such that it could offer the benefit of coming forward earlier.

Relationship with Blunsdon

- 3.46. The site lies outside of the settlement boundary but importantly it is not a protected landscape. It is also not part of the Kingsdown Non-Coalescence Zone that is set by current Local Plan Policy NC5 and identified both on the currently adopted Policies Map (see extract at Image 1) and carried forward within the Blunsdon Neighbourhood Plan at Figure 9 on Page 19 (Image 2).

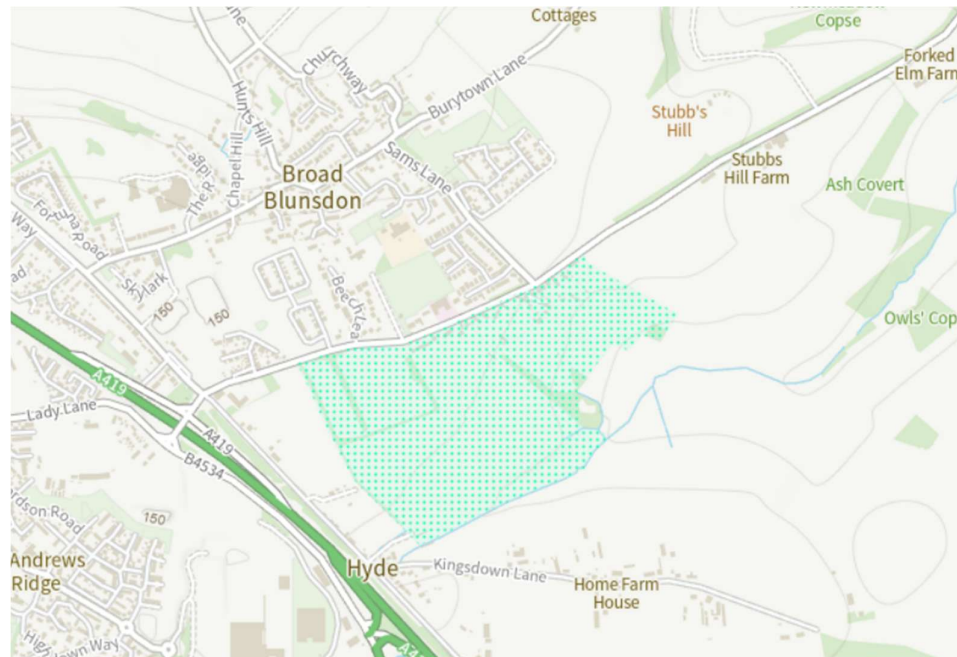


Image 1: Extract from current adopted Policies Map

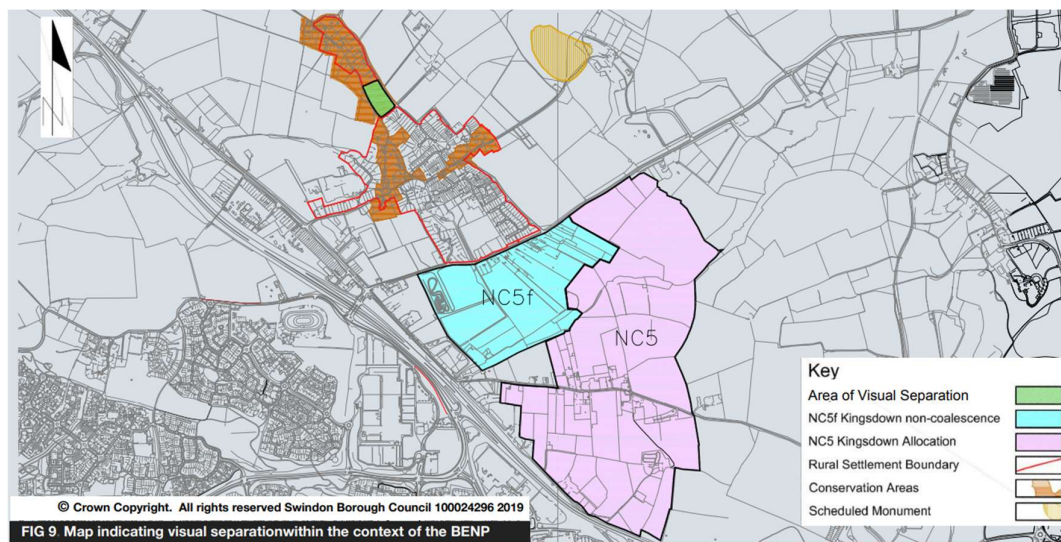


Image 2: Extract from Blunsdon Neighbourhood Plan

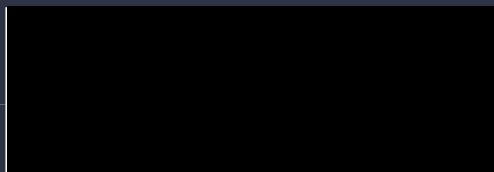
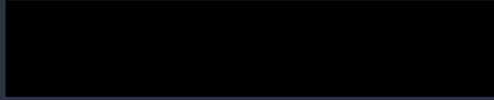
4. Conclusion

- 4.1. These representations have demonstrated two key points for consideration:
- a. A significant number of additional sites will need to be identified to meet even the proposed minimum housing requirement. If the housing requirement needs to be increased, then the need to identify additional sites will be even greater.
 - b. The site proposed is set out within the SHELAA, (Ref/s: s0537 & s0554) is appropriate for allocation.
- 4.2. In respect of the first of these, the emerging Local Plan does not identify a supply of developable sites sufficient to meet the housing requirement over the plan period, nor does it identify a sufficient supply of deliverable sites to provide for a minimum five-year housing land supply at the point of adoption as required by paragraph 72a of the NPPF.
- 4.3. These representations have identified an additional site not currently proposed for allocation within the emerging Local Plan that is clearly suitable for allocation. To summarise in respect of the site:
- a. The scheme can deliver up to 165 dwellings (at 30 dwellings per hectare) to support Swindon's identified housing need, as demonstrated by initial master planning accounting for key constraints.
 - b. The previous Call for Sites submission in 2023 proposed an increased quantum of housing and development on the eastern side of the site, east of the Ash Covert Woodland. The updated 2025 proposal now omits this, and retains the eastern side of the site for green infrastructure and therefore significantly reduces landscape impact.
 - c. The proposal supports Swindon Borough's aspirations for Kingsdown as a Strategic Growth Location (SGL 03) benefiting from planned community infrastructure and highways improvements, therefore maximising the potential of Kingsdown as a Strategic Growth Location (SGL 03) to support the delivery of Swindon's housing need.
 - d. Delivery can come forward in a planned way, for example the mid to latter part of the Local Plan period (2030–2043), following the completion of or alongside Kingsdown's community infrastructure and the A419 bridge (expected by 2028), with approximately 165 homes phased post-2029 therefore addressing housing need in the later stages of the Local Plan period.
 - e. Alternatively, given the location of the site, it could come forward earlier if capacity becomes available on the road network.

- f. The site can be delivered without any major technical constraints or designations impeding its delivery both in regards to implementation and delivery.
- g. Landscape impacts, comparable to those of any greenfield site, would not be significant and must be viewed in the wider changing background context of other development at Kingsdown. The site's visual impact is significantly reduced due to Ash Covert Woodland, which provides a substantial natural visual buffer to the east.
- h. Opportunities will exist for sustainable transport choices in the form of walking, cycling and public transport as the scheme can be integrated into the Kingsdown development, and also Blunsdon to the north west.
- i. Unlike one of the proposed allocations at Blunsdon, the site is not within the Kingsdown Non-Coalescence Zone and as such is a preferential site for development.

4.4. As such, these representations have demonstrated that the emerging Local Plan should be allocating more sites, and that the subject site is suitable for allocation. When preparing the next stage of the Local Plan for Regulation 19 consultation, the subject site should therefore be included for allocation.

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004



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Respondent No: 326

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[REDACTED]

Q1. Title not answered

Q2. First Name Nathasha

Q3. Last Name Shoaib Khan

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

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

SwindonLocalPlan2043

From: nathasha nathaniel [REDACTED]
Sent: 13 October 2025 22:01
To: SwindonLocalPlan2043
Subject: Resident of Wroughton

You don't often get email from [REDACTED] [Learn why this is important](#)

Caution: This email originated outside SBC . Please take care when clicking links or opening attachments. When in doubt, contact your IT Department on x4900

I am Nathasha Shoaib Khan a resident in wroughton. And I am fully against the plan of building 1000 more houses.

With already overstretched infrastructure: Ridgeway View Medical Practice 🏥, schools 🎒 and transport links 🚗 would be totally overwhelmed. Our local GP practice is already dealing with a huge catchment area is there a plan for medical facilities if the 1000 new build properties are erected ? Please do so responsibly.

Wroughton has been a lovely village with so many houses its going to lose its charm.

The scale of housing conflicts with the 2016 Wroughton Neighbourhood Plan, which supports well-integrated growth that enhances local facilities and infrastructure. These proposals undermine that evidence-based local policy position. ⚠️

in my opinion, this would negatively affect the value of our property ⬇️ and our quality of life 💔 Everyone deserves to live life surrounded by nature. That privilege will be taken away from us.

Kind regards
Nathasha Shoaib

[Sent from Yahoo Mail for iPhone](#)



Respondent No: 327

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title

Mr

Q2. First Name

Kyle

Q3. Last Name

Conroy

Q4. Job Title (where relevant)

Higher Sustainable Development Officer

Q5. Organisation (where relevant)

Natural England

[REDACTED]

[REDACTED]

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

SBC admin note: Please see attached response.

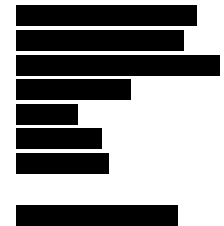
Q13. Please set out the changes you consider are needed. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

SBC admin note: Please see attached response.

Date: 13 October 2025
Our ref: 525366
Your ref: Swindon Borough Council – New Local Plan (Regulation 18)



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



Dear Sir/Madam,

Swindon Borough Council New Local Plan (Regulation 18)

Thank you for your consultation on the above dated 01 September 2025.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Vision

Natural England advises that the Plan's vision and emerging development strategy should address impacts on and opportunities for the natural environment and set out the environmental ambition for the plan area. The plan should take a strategic approach to the protection and enhancement of the natural environment, including providing a net gain for biodiversity, considering opportunities to enhance and improve connectivity. Natural England would also wish to see the following included within the Vision - Enhancement of the natural environment and the ecosystem services it provides; protecting and enhancing natural habitats and species connecting to the Nature Recovery Network; provision of high quality accessible green infrastructure for the benefit of people and nature.

Strategic Objectives

While Natural England supports the strategic objectives for the Plan, in particular the commitment to seek to achieve net carbon zero, however the strategic objectives should be expanded to include the need to safeguard and improve Swindon's environment and ensure the plan achieves net environmental gains, such as new habitat creation and improved public access to natural greenspaces.

Chapter 4: The Spatial Strategy & Strategic Area Policies

Policy SGL 01 – Swindon's Central Area

Natural England welcomes the focus on green infrastructure provision and connectivity for new developments in the Swindon Central Area. Consideration of infrastructure requirements should include delivery of new high quality natural greenspaces and ensuring measures are taken to ensure that resulting pressures on existing greenspaces are fully mitigated and enhanced. Please refer to below comments in relation to Natural England's Green Infrastructure Standards to maintain and create green liveable spaces.

Natural England has no concerns to raise in relation to the allocations in the Swindon Central Area.

Policy SGL 02 – New Eastern Villages (NEV)

Natural England has had previous involvement with the New Eastern Villages and it is

recommended that you refer to our previous advice in relation to these allocated sites.

Site 18-011 includes previously developed land and whilst Natural England has no objection to the principle of development in this location, we advise that the policy protects the adjacent woodland.

Policy SGL 03 – Kingsdown

Natural England has no objection to the proposed allocation at Site 18-015.

Site 18-016 is on permanent pasture which may support wildlife interests and potentially priority grassland habitats. The site should therefore be subject to a Phase 1 survey prior to allocation.

Natural England has no objection to the proposed allocation at Site 18-017 however as the site is located adjacent to Stratton Woods and in walking distance to Stanton Country Park, it is recommended that the relevant policy in the Plan sets out that the development makes a proportionate contribution to the management and maintenance of one or both reserves to mitigate for recreational pressure from the development.

Natural England has been involved in discussions in relation to the development of Site 18-037 at the planning application stage. It is recommended that you refer to our comments in response to the planning application in relation to this proposed allocation site.

Some field parcels for Site 18-038 are on permanent pasture which may support wildlife interests and potentially priority grassland habitats. The site should therefore be subject to a Phase 1 survey prior to allocation.

Policy SGL 04 – Wichelstowe

Natural England has no objection to the principle of a significant urban extension in this location and welcomes the requirement for development to provide green infrastructure and connectivity.

A masterplan for this location should provide green corridors and opportunities for connecting with nature. Please refer to Green Infrastructure and Health & Wellbeing comments below.

Policy SGL 05 – East Wroughton

The allocation sites lie within the setting of the North Wessex Downs National Landscape. NPPF paragraph 189 requires that development within the setting of a National Landscape should ensure they are “sensitively located and designed to avoid or minimise adverse impacts on the designated areas”. A detailed landscape assessment should be provided to clarify the severity of impacts on views to and from the National Landscape and the extent to which those impacts can be moderated by design and scale of a development. Natural England therefore advises that the North Wessex Downs National Landscape Team are consulted over the likely implication of the allocation.

Site 18-023 is on permanent pasture which may support wildlife interests and potentially priority grassland habitats. The site should therefore be subject to a Phase 1 survey prior to allocation.

Policy SGL 06 – North Tadpole

Given the scale of development proposed for Site 18-019 and its proximity to North Meadow SAC/SSSI/NNR, the allocation will require the provision of a SANG in line with the North Meadow and Clattinger Farm SAC Interim Recreation Mitigation Strategy (2023). This should be secured in the policy wording and the location of the SANG identified on a concept plan. We agreed area of SANG must be established early in the site plan so that it is available prior to occupation.

Policy URA 01 – Marlowe Avenue

Natural England has no objection to the principle of development in the location. We note that there is a block of habitat located within the allocation and further information is required to ascertain the quality of this habitat and how it would be retained within the development. The strategic masterplan should include consideration of landscaping measures and requirement for green infrastructure.

Policy URA 02 – Pipers Way

Natural England has no objection to the proposed allocations in this 'urban regeneration area'. The policy should however ensure the areas of deciduous woodland are retained. The strategic masterplan should include consideration of landscaping measures and requirement for green infrastructure.

Other New Site Allocations

Site 18-028

The site is located in close proximity to Pentylands Country Park and development of the site could increase recreational pressure at the Country Park. It is therefore recommended that any development at the proposed allocation site makes a proportionate contribution to the management and maintenance of the Country Park. This should compensate the managers of the Country Park for any increased management costs that would be incurred and provide for improved infrastructure to increase the resilience and visitor capacity of the Country Park. This requirement should be set out in the relevant policy within the Plan.

Site 18-029

A desktop review suggests that this proposed allocation site may have ecological value. It is therefore recommended that the county ecologist assesses the sites potential ecological value to inform the allocation.

Site 18-030

This proposed allocation is on permanent pasture which may support wildlife interests and potentially priority grassland habitats. The site should therefore be subject to a Phase 1 survey prior to allocation.

Site 18-031

This proposed allocation is on permanent pasture which may support wildlife interests and potentially priority grassland habitats. The site should therefore be subject to a Phase 1 survey prior to allocation.

Site 18-032

This proposed allocation is on permanent pasture which may support wildlife interests and potentially priority grassland habitats. The site should therefore be subject to a Phase 1 survey prior to allocation.

Site 18-033

Natural England has no concerns regarding the proposed allocation.

Site 18-034

Natural England has no objection to the proposed allocation however the allocation should ensure the adjacent areas of deciduous woodland are retained.

Site 18-035

Natural England has no concerns regarding the proposed allocation.

Site 18-036

Natural England has no objection to the proposed allocation. It is recommended that the existing trees are retained where possible and replaced in line with the advice outlined in our comments below to Policy CSE6.

Policy HC8 – Gypsy, Traveller and Travelling Showpersons' Accommodation

Natural England does not have concerns regarding the three 'potential pitches' identified in Policy HC8 and corresponding policies map.

The policy wording should include the need to avoid sites of high biodiversity interest (e.g. Priority Habitats, SNICs or statutory designated sites). The requirements and restrictions related to proximity to Habitats sites should also be included in the policy.

Natural England recommends that the North Wessex Downs National Landscape (NL) Team is fully consulted over any implications of the proposed allocations on the designated landscape of the NL. Their knowledge of the location and wider landscape setting of the allocation sites should help to confirm whether or not they would impact significantly on the purposes of the designation. They will also be able to advise whether the allocations sites accord with the aims and policies set out in the NL management plan.

Policy CSE6 – Trees

Natural England welcome the requirement for major development to provide 25% canopy cover however the policy should be clear on what is regarded as 'major development'.

The policy states that trees which need to be removed must be replaced but should provide a metric, such as three trees planted for every tree removed, for replanting. The policy should also be strengthened by stating that veteran trees, ancient trees and trees of landscape/local value should be retained.

It is also recommended that the policy makes reference to Natural England and the Forestry Commission's standing advice for ancient woodland, ancient trees and veteran trees is also recommended. [Ancient woodland, ancient trees and veteran trees: advice for making planning decisions - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/ancient-woodland-ancient-trees-and-veteran-trees-advice-for-making-planning-decisions)

Recreational Disturbance

Natural England welcomes reference to the North Meadow and Clattinger Farm Special Area of Conservation (SAC) in Policy CSE8 and the requirement for relevant development to adhere to the interim North Meadow and Clattinger Farm SAC mitigation strategy. Significant development is planned along the A419 corridor with some allocations located within the North Meadow SAC zones of influence, such as North Tadpole and Kingsdown. Allocation sites at the New Eastern Villages growth location will also have a likely significant effect from recreational pressure on North Meadow due to the direct ease of access to the designated site along the A419.

The Plan should consider any allocations which may have an impact on North Meadow and include the minimum area of Suitable Alternative Natural Greenspace (SANG) in the Policy to mitigate for impacts. The SANG areas may be strategic or site specific and the location of the SANG should be secured in policy and indicated on a concept plan. The policy of a strategic SANG should clarify that a contribution to the SANG will be required from particular allocation sites to ensure the robust delivery of the SANG. The policy and or supporting text should specify that the necessary SANG provision for the development must be secured prior to commencement of the development and the facility open and available to the public by first occupation.

Consideration should also be given to the recreational impacts from allocated sites on existing Country Parks and greenspace. We welcome the wording in Policy HL3 for Parish and Town Councils to have first refusal for ongoing maintenance of new public open spaces however, this policy should be expanded to include a requirement for developers to provide appropriate financial contributions for local existing public open spaces, including locally accessible nature reserves that will be used by new residents. This support should compensate the managers of the Public Open Space / Nature Reserves for any increased visitor manager costs that would be incurred and provide for improved infrastructure to increase the resilience and visitor capacity of the sites affected.

Green Infrastructure

We welcome reference to Natural England's Green Infrastructure Standards in Policy CSE3 and would encourage the Council to strive to achieve these standards for new and existing developments. We recommend that the policy is widened to recognise the important role of blue infrastructure as well as green infrastructure in providing multiple benefits for people and nature.

Whilst we strongly support the inclusion of the Natural England Green Infrastructure Standards in the policy, it is recommended that further consideration is given regarding the expectations for

development to demonstrate they have met each of the standards. A number of the standards require the LPA to set targets which developments have to be designed to meet. This detail should be provided in the policy, or in the forthcoming GI strategy.

The Green Infrastructure Framework (GIF) resource provides evidence-based advice and tools on how to design, deliver and manage green infrastructure (GI). We welcome the aspirations around GI and links to GI resources.

GI should create and maintain green liveable places that enable people to experience and connect with nature, and that offer everyone, wherever they live, access to good quality parks, greenspaces, recreational, walking and cycling routes that are inclusive, safe, welcoming, well-managed and accessible for all. GI provision should enhance ecological networks, support ecosystems services and connect as a living network at local, regional and national scales. Development should be designed to meet the 15 Green Infrastructure Principles.

The Green Infrastructure Standards can be used to inform the quality, quantity and type of green infrastructure to be provided. Major development should have a GI plan including a long-term delivery and management plan. Relevant aspects of local authority green infrastructure strategies should be delivered where appropriate. GI mapping resources can be used to help assess deficiencies in greenspace provision and identify priority locations for new GI provision. The GIF provides a useful resource for local authorities in the formulation of their local plan policies. Ideally the Standards and Targets set out in the GIF should be used in developing and writing policy.

The five Headline Green Infrastructure Standards are: S1: Green Infrastructure Strategy Standard S2: Accessible Greenspace Standard S3: Urban Nature Recovery Standard S4: Urban Greening Factor Standard S5: Urban Tree Canopy Cover Standard. These standards can provide the output measures so that developers have certainty over what green infrastructure is needed on site. They can be included as site specific and area-based requirements in site allocation policies.

To help the GI standards to be delivered, local authorities should set green infrastructure targets. These should include delivery levels over time. For instance, the % of people having good quality publicly accessible greenspaces within 15 minutes' walk from home by 2030. The GIF includes the Natural England Green Infrastructure Planning and Design Guide which provides comprehensive details of what good green infrastructure design looks like and identifies how green infrastructure can contribute to the National Design Guide's ten characteristics for well-designed places. The GIF also includes "Process Journeys" for local authorities which provides further guidance in developing GI policies and strategies.

We strongly support the inclusion of the Urban Greening Factor in Policy CSE3. This will ensure that all developments contribute to the GBI, not just those that will be required to provide BNG. The Natural England Urban Greening Factor standard includes a higher target score of 0.5 for residential greenfield sites which has not been included in the policy. We would therefore encourage you to consider using the 0.5 target score for residential greenfield sites, either through inclusion in the policy or targeting to the sites of greatest size or sites in areas of greatest need for GBI. Whilst BNG will be expected to deliver more on these sites there is a potential for BNG to be delivered offsite, and it will be important to ensure that significant sites provide sufficient accessible GI.

Biodiversity Net Gain

Natural England welcomes the inclusion of Policy CSE8 which covers Biodiversity Net Gain.

We note that Policy CSE8 covering Biodiversity Net Gain affirms the 10% minimum level. We suggest that the policy's commits to development proposals and their associated BNG measures being guided by the Local Nature Recovery Strategy for Swindon & Wiltshire and the Local Ecological Network. We support the policy's commitment to the Biodiversity Net Gain hierarchy.

The Plan should identify and pursue opportunities for securing measurable net gains for biodiversity. The Plan should also set out the BNG strategy including:

- Requirements for on-site and off-site provision
- Identifying priority opportunities of strategic significance (habitats and areas) for BNG, for instance through mapping ecological networks
- Advising on the metric to use to calculate gains, for example the most up to date version of [Defra's Biodiversity Metric](#).

The Plan should also aim to achieve wider environmental gains, going beyond BNG, to include wider natural capital benefits such as improved water and air quality and recreation. Natural England's [Environment Benefits from Nature tool](#) can help identify opportunities.

The Plan should set out a strategic approach, planning positively for the creation, protection, enhancement and management of networks of biodiversity. There should be consideration of geodiversity conservation in terms of any geological sites and features in the wider environment.

Natural England would like to draw your attention to the following further guidance on [Biodiversity Net Gain](#) and the [Biodiversity Metric](#).

Landscape

Development proposals brought forward through the Local Plan should avoid significant impacts on protected landscapes, including those outside the Plan's area and early consideration should be given to the major development tests set out in paragraph 190 of the National Planning Policy Framework (NPPF).

Natural England welcomes the consideration of direct and indirect impacts to the North Wessex Downs National Landscape and its setting from Policy CSE7 of the Local Plan and would support the requirement for developments within, or in the setting, to be accompanied by a landscape and visual impact assessment being included within the Policy wording.

In addition to the requirement for strengthened policy wording to guide developments and their design, in accordance with the requirements of the NPPF, we recommend that Policy S6 includes reference to the amendments to Section 85 of the Countryside and Rights of Way Act 2000 introduced by Section 245 of the Levelling Up and Regeneration Act 2023. This details that:

'In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty in England, a relevant authority other than a devolved Welsh authority must seek to further the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty'.

Climate Change

Natural England suggests that as they are developed the Climate Change policies should include policy guidance on Nature based solutions which can play an important role in aiding climate change adaptation. Nature based solutions are measures such as green roofs and walls, street trees, SuDS, and wetlands. This approach also includes the creation of a better linked habitat network by conserving, creating, or enlarging existing habitats which will build up resilience to climate change at a landscape scale. SuDS need to be recognised as an effective way of both managing surface water while contributing to biodiversity net gain. We suggest that these aspects should be considered at an early design stage of the planning process to incorporate multiple benefits and climate change adaptation. Climate Change policy should encourage water sensitive design to manage water on site as part of climate change adaptation and so there could be a cross reference to this. Renewable energy and engagement with renewable energy proposals need to be covered by policy and guidance and the opportunities for biodiversity enhancement need to be considered within this.

Policy should also set out how development (and associated provision for onsite nature enhancement /landscaping etc.) will be climate resilient and address climate impacts upon protected sites, species and habitats. The policy should encourage sustainable drainage and water sensitive design to manage water on site as part of climate change adaptation. Also, renewable or low carbon energy developments should recognise the potential impacts on the natural environment. We would

expect the plan to address the impacts of air quality on the natural environment. It should address the traffic impacts associated with new development, particularly where this impacts on European sites and SSSIs.

The environmental assessment of the plan's Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA) should also consider any detrimental impacts on the natural environment and suggest appropriate avoidance or mitigation measures where applicable. The effects on local roads in the vicinity of any proposed development on nearby designated nature conservation sites (including increased traffic, construction of new roads, and upgrading of existing roads), and the impacts on vulnerable sites from air quality effects on the wider road network in the area (a greater distance away from the development) can be assessed using traffic projections and the 200m distance criterion followed by local Air Quality modelling where required. We consider that the designated sites at risk from local impacts are those within 200m of a road with increased traffic, which feature habitats that are vulnerable to nitrogen deposition/acidification. APIS provides a searchable database and information on pollutants and their impacts on habitats and species.

Natural England has published guidance <https://publications.naturalengland.org.uk/publication/4720542048845824> to aid competent authorities in determining effects of pollution from traffic on designated sites. This recommends that a guideline screening threshold for significance is based on a predicted change of daily traffic flows of 1,000 annual average daily traffic movements (AADT) or more, within 200m of a designated site.

The Local Plan will be required to consider the strategic impacts on water quality and resources. The Local Plan should be based on an up-to-date evidence base on the water environment and as such the relevant River Basin Management Plans should inform the development proposed in the Local Plan. These Plans outline the main issues for the water environment and the actions needed to tackle them. The Local Plan will need to contain policies which protect habitats from water related impacts and where appropriate seek enhancement. Priority for enhancements should be focussed on European sites, SSSIs and local sites which contribute to a wider ecological network.

The Local Plan should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpins our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver. The plan should safeguard the long-term capability of best and most versatile agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification) as a resource for the future.

Water Quality

Natural England welcomes consideration of water quality and its effects on designated sites. Many designated sites, priority habitats and species are dependent on good water quality particularly those that are water-dependent and hydrologically linked to groundwater and surface water bodies. These habitats will be sensitive or burdened from water quality pressures such as nutrient enrichment and increased pollutants.

The Plan should consider and encourage more stringent protection of the water quality in the catchment as this will help to prevent deterioration, maintain and/or restore the condition of water-dependent designated sites (and wider) within the landscape.

Where relevant the Plan should consider, support delivery of and align with the objectives and environmental ambition within water quality related strategic plans such as Drainage and Wastewater Management Plans. For example, the Plan should incorporate measures designed to minimise surface water drainage and reduce pressure on the wastewater network such as:

- greater use of sustainable drainage systems (SuDS),
- maximising surface water infiltration,
- river / catchment management aimed at 'slowing the flow'.

The Plan should also consider any local / catchment scale environmental investigations and improvements being delivered through water companies' WINEP. Natural England has had

involvement in WINEP where there are potential or known impacts from water company assets and activities to designated sites in relation to water quality and are happy to advise further.

Air Quality

Natural England supports the requirement within Policy CSE12 that developments with the potential to result in air quality impacts to designated sites will need to avoid or fully mitigate these impacts. We note that further assessment is being undertaken to support the HRA and will be available at Regulation 19. We will provide further advice at this stage.

Soils

The draft local plan does not include a policy on soils. Soils, in both rural and urban areas, are a key component of green and blue infrastructure, biodiversity, landscape character, and geodiversity. The Local Plan should give appropriate weight to the variety of roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpins our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver. The plan should safeguard the long-term capability of best and most versatile agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification) as a resource for the future in line with the National Planning Policy Framework, as well as the protection of urban soils as a key component of green and blue infrastructure.

The conservation and sustainable management of soils is reflected in the National Planning Policy Framework (NPPF), particularly in paragraph 187. When planning authorities are considering land use change, the permanency of the impact on soils is an important consideration. Particular care over planned changes to the most potentially productive soil is needed, for the ecosystem services it supports including its role in agriculture and food production. Plan policies should therefore take account of the impact on land and soil resources and the wide range of vital functions (ecosystem services) they provide in line with paragraph 125 of the NPPF.

Health and Wellbeing

There is increasing recognition of the importance of nature and place as a determinant of individuals' mental and physical health. Access to natural green spaces can help reduce stress, fatigue, anxiety and depression, and boost immune systems and encourage physical activity. The risk of chronic diseases such as asthma may also be reduced.

[The Defra 25 Year Plan](#) outlines nature-based actions that can be taken to help people connect to the natural environment to improve health and wellbeing. Such actions can include 'greening' our towns and cities, planting urban trees, encouraging children to access nature in and out of school and improving access for all in local green spaces. Exposure to green space, particularly in urban areas, is associated with improved psychological well-being, physical activity and linked health outcomes. [NEER030 A narrative review of reviews of nature exposure and human health and well-being in the UK \(1\).pdf](#)

Natural England recognise the benefits of investing in nature-based solutions for climate and health. Climate resilient communities are less likely to experience negative health impacts of extreme weather events, made worse by climate change. Nature-based solutions can also reduce the negative impacts of air pollution which poses significant health risks. SUDs, street trees and other nature-based solutions provide health benefits and savings to the local health system which could be referenced in this Plan.

Natural England welcome the recognition of multi-functional benefits of Green Infrastructure, including health and wellbeing in Policy CSE3 and would recommend reference to the role of connecting people with nature here. There is increasing evidence to suggest that higher levels of connection to nature are positively correlated with outcomes such as improved wellbeing. [EIN068 Connection to nature.pdf](#)

In relation to Policy HL4, we support the design and creation of environments where children and young people have contact with and therefore connect with nature. Natural England recognises

evidence that shows the beneficial effects of nature for children's mental health, cognitive development, and the prevention of developmental disorders. [EIN067 How the natural environment can support children and young people.pdf](#)

If you have any queries relating to the advice in this letter, please contact me directly.

Yours faithfully,

Kyle Conroy
Higher Sustainable Development Officer
Wessex Area Team

[Redacted signature]

Date: 17 October 2025
Our ref: 525366
Your ref: Swindon Borough Council – New Local Plan (Regulation 18) Habitats
Regulations Assessment



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



Dear Sir/Madam,

Swindon Borough Council New Local Plan (Regulation 18)

Thank you for your consultation on the above dated 01 September 2025.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Habitats Regulations Assessment (HRA)

Natural England has the following comments on the HRA as currently drafted:

Air Quality

We note that Swindon Borough Council are due to commission a full assessment of traffic modelling and that the impacts of air quality from new development arising from the Plan on North Meadow and Clattinger Farm SAC will be included in the Regulation 19 HRA. We would be happy to provide our advice on the assessment at this stage.

The Habitats Regulations Assessment will need to consider both transport and wider development related (for example, those resulting from any industrial development allocations) air quality emissions. We concur with section 5.2 of the HRA report that the air quality assessment should consider potential impacts arising from eutrophication (nitrogen), acidification (nitrogen and sulphur) and direct toxicity (ozone, ammonia and nitrogen oxides).

Water Quality & Water Quantity

Natural England welcomes consideration of potential impacts to designated sites from both water quality and water quantity through the Habitats Regulations Assessment and the sites identified within Table 3.4.

Natural England supports Plan Policy U1: Wastewater, Sewerage Infrastructure and Water Supply however, we recognise that these provisions alone may not be sufficient to avoid a risk that increased water demand may result in adverse effects on River Lambourn SAC, Kennet and Lambourn Floodplain SAC, North Meadow and Clattinger Farm SAC, Cothill Fen SAC and Oxford Meadows SAC during the lifetime of the Plan. Natural England welcomes the planned discussions between Swindon Borough Council and Thames Water to discuss water resource availability for future growth. These discussions should assess the risks around water quantity for each SAC and its catchment and consideration should be made to the likely progress of improving water supply alongside potential phasing of developments coming forward. Natural England welcomes the

opportunity to discuss these matters as the Plan progresses.

Recreational Pressure

Natural England agrees that the North Meadow and Clattinger Farm SAC is appropriate for consideration of impacts resulting from recreational pressure. The HRA report identifies which allocations are located in the two recreational Zones of Influence as set out in the interim mitigation strategy. Natural England notes that some allocations outside of the Zones of Influence will require the delivery of Suitable Alternative Natural Greenspace (SANG). This includes allocations at the New Eastern Villages growth location which has potential for adverse effects due to the direct ease of access to the designated site along the A419.

The Plan policies for allocations requiring mitigation measures for North Meadow and Clattinger Farm SAC need to make it clear that the requisite SANG provision is secured prior to commencement and open to the public by first occupation.

Appropriate Assessment

Natural England notes that the screening conclusions within the Habitats Regulations Assessment will be revisited as the Plan progresses and that a full Appropriate Assessment will be undertaken at the Regulation 19 stage of the Swindon Local Plan. We will be pleased to provide input and advice as the Plan and Appropriate Assessment evolve.

If you have any queries relating to the advice in this letter, please contact me directly.

Yours faithfully,

Kyle Conroy
Higher Sustainable Development Officer
Wessex Area Team




Respondent No: 328

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Neville

Q3. Last Name Surtees

Q4. Job Title (where relevant) Associate Director

Q5. Organisation (where relevant) Savills obo The Thomas Freke and Lady Norton Charity

[REDACTED]

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

SBC admin note: Please see attached response

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 2043 Regulation 18 Consultation

Date: 10 October 2025

Respondent: The Thomas Freke and Lady Norton Charity

Site: Land North of Roundhills Mead, Highworth

Introduction

Savills is instructed by The Thomas Freke and Lady Norton Charity (the 'Charity') to submit representations in relation to the Swindon Local Plan 2043 (Regulation 18). These representations focus on the Charity's request that its land North of Roundhills Mead, Highworth is allocated for 250 new homes, and in relation to the spatial strategy.

This site has previously been identified by the Council as being suitable for residential allocation, both in the Strategic Housing and Economic Land Availability Assessment (SHELAA) (July 2019) and in the Second Regulation 19 consultation version of the now withdrawn Swindon Local Plan Review (July 2021).

The Thomas Freke and Lady Norton Charity

The Charity originally dates back to two local charities which were both founded in Hannington, Wiltshire in 1718. The Charity uses income from its investments to award grants to local organisations and individuals within its Area of Benefit, which consists of the parish of Hannington in the Borough of Swindon and its five adjacent parishes. These grants are to benefit the local community including long term annual grants to Prospect Hospice, grants to Brighter Futures, local schools, the church as well as many other Local Groups and charities. Roundhill Farm is permanently endowed to the Charity, extending to circa. 105 hectares, and includes the application site. The farm outside of the land being proposed as a housing allocation by the Charity will remain in agricultural use following the proposed development. In addition, further land will be acquired by the Charity in the surrounding area to ensure that the Farm remains in viable use.

Spatial Strategy Policy SS1

The Charity supports the Council's proposed level of housing requirement and the length of the Plan period, subject to the Plan being adopted by 2028.

However, whilst the Charity supports the principle of Swindon town centre regeneration, it has concerns over the reliance and level of housing proposed as part of new allocations in the Central Area. In this regard, the Charity notes that there is no strategy proposed for development outside of these large allocated brownfield sites, including at settlements such as Highworth which is a sustainable location for new homes at the scale proposed by the Charity. Furthermore, the Local Plan evidence base does not include robust justification to conclude that the redevelopment of Central Area sites will be financially viable – either in the short, medium or long terms; nor that the level of housing proposed within this area would be delivered during the Plan period. On this basis, the Spatial Strategy is unsound.

The basis for this conclusion takes into consideration the findings of the Council's Viability Assessment (VA) (published in August 2025). In the Viability Assessment there are various references made to how new housing on brownfield sites in the Central Area is not financially viable, both to help address the Council's current five year housing land supply shortfall and in the long term. For example, based on the types of housing schemes that SBC envisages within the Central Area (and without any affordable housing included), the VA advises that *"All sites assessed in the Central Area are unviable with negative residual values"* (Table 10.2a / Table 12.6a) and concludes that *"it would be necessary [for SBC] to be cautious in relying on brownfield sites in the five year land supply and overall housing trajectory, as the delivery of these is likely to continue to be challenging"* (Paragraphs 12.73 and 12.100).

Instead, the Local Plan should identify other locations for new homes in the Borough which are sustainable, viable and deliverable. As set out below, the Charity hereby submits its land North of Roundhills Mead, Highworth for consideration as a housing allocation as part of the Call for Sites exercise which runs alongside the Regulation 18 consultation. The site location plan and illustrative masterplan are provided at **Appendix 1 and Appendix 2**. The site has the capacity for approximately 250 new homes and would include 30% affordable housing.

Land North of Roundhills Mead

The site being promoted on behalf of the Charity has previously been identified by the Council as being suitable for allocation for 250 new homes. The site was included in the Second Regulation 19 consultation version of the now withdrawn Swindon Local Plan Review (July 2021), i.e. Policy LA17. Prior to SBC proposing the site for allocation in that Plan, the Council's SHELAA published in July 2019 concluded that *"The site is generally unconstrained and would appear to [be] in principle be suitable for residential development subject to consideration of the wider sustainability issues. Consideration would need to be given to the setting of scheduled monuments"* (Site S0467).

The Charity supported the proposed allocation in the July 2021 Local Plan and note that there has been no material changes in site circumstances to change the conclusion that this site is suitable for new homes. The development of the site is viable and it is deliverable in the short term.

An outline planning application has been submitted for the development of the site (SBC Ref. S/OUT/25/0664), validated on 2nd June 2025. This submission followed the receipt of pre-app advice in March 2023 which concluded that although the site is outside the settlement boundary, because of the provisions of paragraph 11(d) of the NPPF, this is not sufficient to raise a policy objection in relation to this issue. In addition, the pre-app advice noted that this proposal would make a contribution to the Borough's five-year housing land supply and in terms of delivering affordable housing (this remains the case). The pre-app advice identified heritage, archaeological, BNG and drainage matters as requiring consideration, all of which have been addressed in the application with no objections received from statutory consultees to the planning application on those proposals. It is also noted that no objections to the application have been received in relation to: education; public health; or rights of way.

A further submission of information will be submitted shortly with the application to address outstanding issues relating to landscape, transport and noise mitigation. In relation to landscape, it is noted that the Landscape and Visual Impact Assessment of the proposed development concludes that the proposed development post-mitigation will have a Moderate/Minor – Minor visual effect.

It is envisaged that the application could be determined by the Council in late 2025 / early 2026 and development could commence in early / spring 2027. On this basis, the proposed development could deliver between 150 and 200 new homes within the first five years of the new Local Plan.

The proposed development will comprise the following:

- Up to 250 dwellings, including a mix of house types and sizes to be agreed with the LPA.
- A policy compliant level of affordable housing (i.e. 30% of the total number of homes to be built).
- Vehicular and pedestrian access from A361 Lechlade Road and from Roundhills Mead.
- A minimum of 2 hectares of public open space.
- 2 local level equipped play areas to serve future residents and the wider community (such as those living at Sevenfields and Edencroft to the south of Roundhills Meads).
- Sustainable drainage systems, such as swales and attenuation basins, to mitigate flood risk.
- Car and bicycle parking at levels in accordance with SBC standards.
- New pedestrian and cycle routes within the site.

The location of the site is sustainable and will provide footpath / cycleway connections to the adjacent Aldi foodstore. The site is also located next to a frequent bus route connecting the site to Highworth and Swindon.

Changes Requested:

The Charity requests that the Spatial Strategy is revised and the scale of new housing being proposed in the Central Area reconsidered. To meet the Council's housing requirement set by the standard method set out in the NPPF, an equivalent increase in the delivery of new homes should be made on sustainable, viable and

deliverable sites elsewhere in the Borough. This should include a new housing allocation on land North of Roundhills Mead, Highworth.

The principle of allocating land on this site has previously been accepted by Swindon Borough Council, as stated in SBC's Strategic Housing and Economic Land Availability Assessment (SHELAA) (July 2019) and in the Second Regulation 19 consultation version of the now withdrawn Swindon Local Plan Review (July 2021). Furthermore, there have been no material changes to the landscape, environment or the location of the site since it was previously proposed for new homes that could alter the conclusion that the site is acceptable for development.

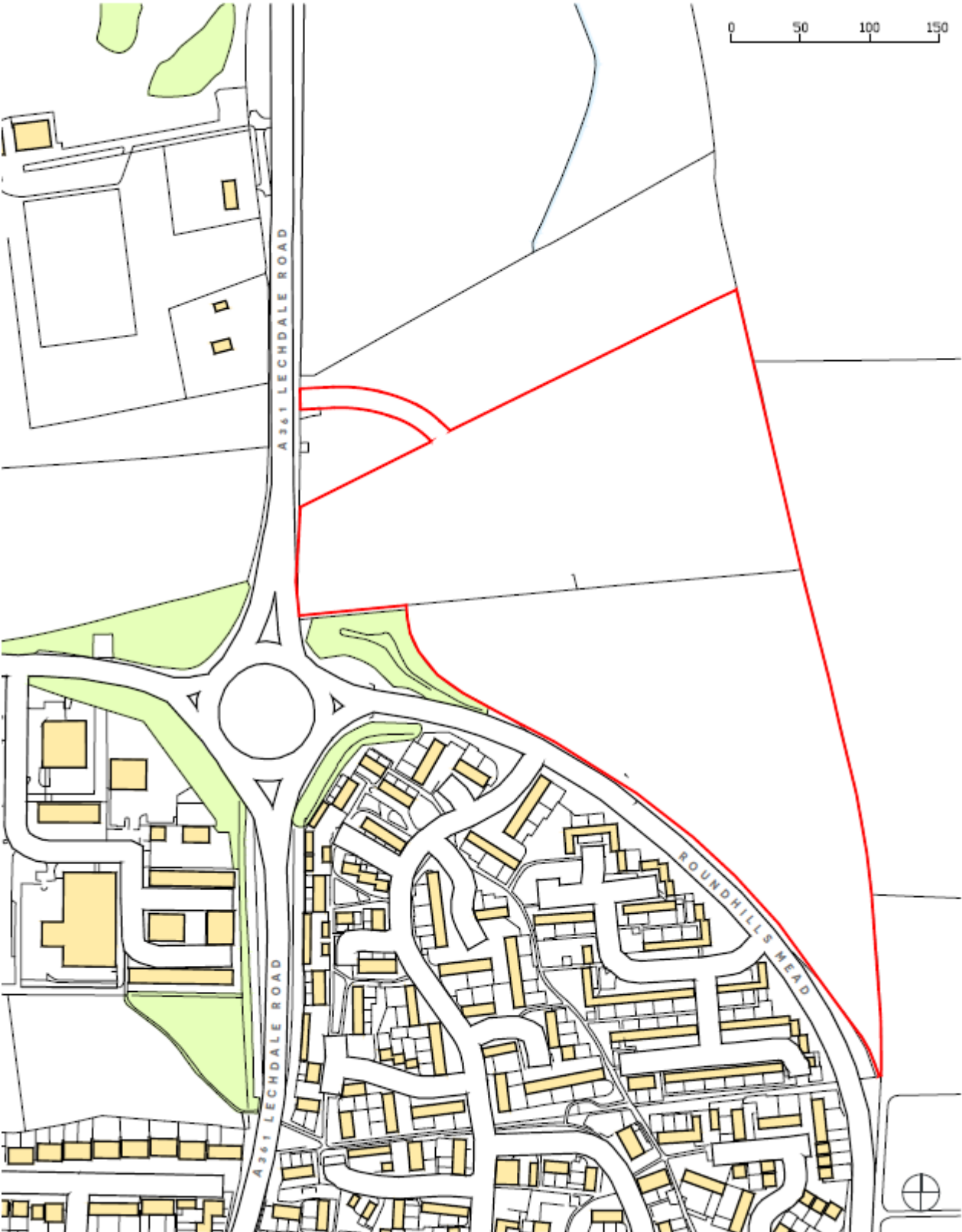
The delivery of new homes on Land North of Roundhills Mead is viable and deliverable and will provide 250 new homes (including 30% affordable housing), open space, land for biodiversity net gain and improved connectivity between Highworth and the adjacent Aldi store for pedestrians and cyclists.

Based on a planning consent being issued in Spring 2026, the development can be completed by 2031/32. The delivery of this development will make a significant contribution towards SBC addressing its current 5 year housing land supply shortfall, which the Council estimates to be 4.90 years.

Without such changes to the Local Plan it is unlikely to be found sound at Examination.

The Charity would like to work with the Council in making further changes to the Local Plan and would be pleased to discuss their representations further with Officers.

Appendix 1
Site Location Plan



Appendix 2

Illustrative Masterplan





Respondent No: 329

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Q1. Title Ms

Q2. First Name Jane

Q3. Last Name Milner-Barry

Q4. Job Title (where relevant) Councillor

Q5. Organisation (where relevant) Swindon Borough Council

[Redacted]

[Redacted]

[Redacted]

[Redacted]

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

This new policy governing digital connectivity and telecommunications adds a new requirement ensuring that all developments have the infrastructure to enable them to be connected to full fibre broadband. This is welcome – though surely should be “must” not “should”. However, this policy is very much weaker than the current policy IN3 which it replaces in ensuring that telecommunications equipment does not harm the local environment. All that is left of the old policy is that the development should – only “should” - be “sited and designed to minimise the impact on the amenity of the surrounding area”. Currently, proposals “shall be supported” (“shall”, not “should”) provided that a number of conditions are fulfilled. This means that if proposals do not fulfil these conditions, they will not be supported. Conditions include not forming an adversely intrusive addition to the street scene, demonstrating that all alternative sites and potential mast sharing opportunities have been assessed including the use of existing buildings and structures, and keeping the size of the development to a technical minimum. The loss of these requirements means that the Planning Department will be unable to reject unwanted applications including applications for digital advertising boards owned by, and benefiting only, private companies, sited in public open spaces, and over the content of which the Local Authority has no control. Current applications which include a technically unnecessary 4ft x 10ft digital advertising board have not been kept to a technical minimum and the applicants have not provided any evidence that they have considered alternative and less obtrusive sites. The original policy should be restored, so that the local planning authority will continue to have the authority to control what structures are erected in public open spaces.

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 the proposed Policy U2 and insert: U2: Digital Connectivity and Telecommunications 1. All new development must ensure that appropriate telecommunications infrastructure is provided during the construction phase to enable the development to be connected to full fibre broadband. 2. All Information Technology (ICT) and telecommunications proposals must be sited and designed in such a way that the appearance of the surrounding area is considered. Proposals for ICT and telecommunications developments shall be supported provided that: - the siting of the proposal and any other additional equipment involved with the development does not unduly detract from the appearance of the surrounding area or form an adversely intrusive addition to the street scene; and - the amenities of any neighbouring sites are not unacceptably harmed by the proximity of the proposed telecommunication development; and - the colour and profile are sympathetic to the site's surroundings and the size of the development is kept to a technical minimum to ensure any adverse impact on the environment is minimised: and - there is justification demonstrating that all alternative sites and potential mast sharing opportunities which fulfil the functional requirements of the development have been assessed including the use of existing buildings and structures.



Respondent No: 330

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title

Mrs

Q2. First Name

Susan

Q3. Last Name

Brown

Q4. Job Title (where relevant)

not answered

Q5. Organisation (where relevant)

not answered

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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

1. Education - Shortfall in secondary places now. Now extended schools REQ'D 2. Transport - Jct 15 & 16 & A419 already congested. Also main route through village is unsuitable for more heavy traffic. 3. Landscape - The villagescape will be irrevocably altered more than a third bigger. 4. Services - GP is not large enough for current population which includes Wichelstowe Digital infrastructure - fibre optic installation - Internet & mobile signals already very unreliable in parts of the village. Extra strain on current water supply bore holes - already heavy demand.

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: 331

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Alison

Q3. Last Name Young

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) Turley on behalf of St Martin's Management Corporation

[REDACTED]

[REDACTED]

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

SBC admin note: Please see attached response.

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

Representations to the Swindon Local Plan 2023-2043 Regulation 18 Consultation Draft

Windmill Hill Business Park, Swindon

October 2025

Contents

1.	Introduction	1
2.	Chapter 4: The Spatial Strategy & Strategic Area Policies	3
3.	Chapter 5: Sustainable, High-Quality Development	6
4.	Chapter 6: Places for People	7
5.	Chapter 7: An economically thriving Swindon	11
6.	Chapter 9: An environmentally sustainable Swindon	15
7.	Chapter 11: Utilities	19
8.	Conclusions	21
	Appendix 1: Site Location Plan	23
	Appendix 2: SHELAA Site Submission Form	24
	Appendix 3: Technical Review of Housing Needs in Swindon	26

Alison Young



Client

St Martin's Management Corporation

Our reference

STMS3009

October 2025

1. Introduction

- 1.1 These representations to the Swindon Local Plan 2023-2043 Regulation 18 consultation have been prepared by Turley on behalf of St Martin's Management Corporation (SMMC) in relation to their land ownership at Windmill Hill Business Park, Swindon. A site location plan is included at **Appendix 1**.
- 1.2 SMMC constructed the Business Park between the 1980s and early 2000s and retain ownership and management of the majority of the Business Park, excluding Whitehill House at the west of the site. The Business Park comprises a number of office buildings, a children's nursery and a windmill, which was relocated from Chiseldon in the 1980s. These are set within a mature landscape structure and served by the site's internal road network, which takes access from the A3012 and the B4534.
- 1.3 SMMC lease the buildings to a range of occupiers but demand has dwindled over recent years and some of the buildings are nearing the end of their commercial life. It is in this context that SMMC is currently exploring alternative uses for the site.
- 1.4 The site is a designated 'Key Employment Area' in the Adopted Swindon Core Strategy and is proposed for designation as an 'Industrial Location' in the current consultation document. Both of these policies seek to restrict development on site to employment related uses.
- 1.5 SMMC's vision for this site is to redevelop the site to create a new sustainable mixed-use neighbourhood of around 600 homes, while retaining some of the more modern office buildings, the children's nursery and the windmill. The proposal is to set new development within the established green infrastructure and transport infrastructure framework on site. Such a proposal would address a number of the strategic objectives set out in paragraph 2.5 of the draft Local Plan.
- 1.6 **Structure of these Representations**
- 1.7 Given the nature of the proposals for Windmill Hill and the interests of our client we have not sought to respond to all of the draft policies set out in the consultation document. Rather, we have sought to comment on those matters considered to be most relevant.
- 1.8 Each of the chapters and their associated draft policies are considered in separate sections of these representations.
- 1.9 We have made a number of broad points which go to the heart of the council's strategy, which we consider warrant further discussion. In addition, we have reviewed relevant development management policies and in these cases have sought to offer suggestions for specific changes to assist as the council moves towards a Regulation 19 Local Plan.
- 1.10 The representations are accompanied by a submission of the site to the Strategic Housing and Economic Land Availability Assessment (SHELAA). The completed form is

at **Appendix 2** with site location plan at **Appendix 1**. We would welcome the inclusion of the site in the next version of Swindon Borough Council's SHELAA.

- 1.11 If upon review of these representations, there are any matters on which we can be of further assistance then please do not hesitate to get in touch. We would be grateful if you could keep us informed of progress on the new Local Plan.

2. Chapter 4: The Spatial Strategy & Strategic Area Policies

The Plan Period

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

Recommendation

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

Policy SS1: Swindon's Spatial Approach to Growth

- 2.3 As the major settlement within the Borough, Swindon town is rightly identified as the main focus of housing, commercial and industrial growth. Focusing development within the urban area is supported.
- 2.4 The policy seeks to focus development within the 'Swindon Urban Area Sustainable Development Locations,' which are defined as:
- Swindon Town Centre and the wider 'Central Area' **Strategic Growth Location**;
 - **Urban District Centres**;
 - **Urban Regeneration Areas** (including Pipers Way and Marlowe Avenue);
 - and along key public transport corridors;
- 2.5 In our responses to Policy SGL 01 below, we set out that the plan as currently drafted significantly overestimates the likelihood that the Town Centre regeneration sites will deliver the levels of growth anticipated in the timescales set out. It has been the aspiration to regenerate the Town Centre throughout the current plan period and there is clear evidence that timescales for sites coming forward have slipped continually and that there are a range of complex, site specific issues, including major viability issues, that have caused delays.

- 2.6 Continuing to ignore the well evidenced barriers to progression of these town centre sites as part of the emerging plan will lead to a repetition of the outcomes recently experienced – i.e. that key regeneration sites will take longer to deliver than anticipated and that other housing sites will need to be identified in order for the Council to maintain a five year housing land supply, and to ensure that the mandatory minimum housing requirement is delivered over the plan period.
- 2.7 There have also been delays with the Strategic Growth Locations (SGLs) over the last plan period and we consider that the council has underestimated the timescales needed to deliver the associated extensions to them.
- 2.8 Windmill Hill Business Park does not fit into any of the four sub-categories of a 'Swindon Urban Area Sustainable Development Location,' but as a well-connected brownfield site within the urban area, it does represent an opportunity to bring forward housing development in a sustainable location.

Recommendation

- 2.9 While we do not object in principle to the council setting out a focus for housing development in part (a) of the policy, we would suggest that the policy makes clear that development within the urban area would be supported, in particular on brownfield sites.
- 2.10 Part (b) of the policy limits the type of development on designated Industrial Locations to employment uses. We set out later in these representations the reasons why Windmill Hill should not be designated as an Industrial Location. Nonetheless, given the proposed designation, we would recommend that additional flexibility is introduced to policy SS1 to allow housing development in Industrial Locations where appropriate.

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

- 2.11 Swindon Town is the major settlement within the Borough, and accordingly should be supported in principle as an appropriate location for regeneration, growth and development over the emerging plan period. We support this aspiration and agree that regeneration of this area should be supported by the emerging plan.
- 2.12 However, we consider that the plan as currently drafted significantly overestimates the likelihood that the Town Centre regeneration sites will actually deliver the levels of growth anticipated in the timescales set out. Appendix 1 to the draft plan details a number of sites within the Swindon Central Area, all of which are new allocations and in total considered capable of delivering 4,347 homes in the plan period.
- 2.13 We support in principle the aspiration to regenerate the Town Centre. However this has been an aspiration for some time and there is local evidence that timescales for sites coming forward have slipped continually and that there are a range of complex, site specific issues, including major viability issues, that have caused delays.
- 2.14 The draft plan is accompanied by a Viability Assessment (August 2025, doc 02.03). This considers the proposed site allocations, including brownfield sites in the Town Centre.

The report concludes on this matter, at paragraph 12.98, that development of brownfield sites, particularly in the centre of Swindon is challenging, and advises;

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

- 2.15 It is clear that there are serious challenges to delivering these types of sites in Swindon. The Council's recently published Viability Report directly cautions against relying on delivery from brownfield sites in the town centre as the evidence indicates that they are simply not viable.
- 2.16 If the 4,347 homes on new sites within the Central Area were not to come forward in the plan period, this would reduce the projected delivery within the plan period to 21,449 homes. This alone would result in the plan being short of the minimum housing requirement over the plan period by 2,651 homes. Even if just a reasonable proportion of them were not to come forward, this could still push the Council below the minimum 24,100 homes. Given the concerns raised around these sites in the Council's own evidence base this is a stark indication of the lack of resilience currently in the plan supply. These town centre sites are just 10 of the 43 new sites proposed to be allocated in the emerging plan. As currently drafted if these were not to come forward as anticipated then even if every other new site identified were to deliver in full, along with all of the existing Strategic Allocations (with and without planning permission currently) and the anticipated level of windfall development were to materialise, the plan would still fail to meet its LHN.

Recommendation

- 2.17 Our recommendation is that in order to ensure the LHN is actually met in the plan period, the plan needs to identify sufficient sites delivering well in excess of this, and to express the figure as a minimum housing requirement throughout the plan.
- 2.18 We suggest that a contingency of circa 10% is built into the housing to be planned for on new allocations, and that a suitable lapse rate is applied to the existing commitments to account for any sites not coming forward as anticipated.
- 2.19 There should also be a critical review of town centre regeneration sites, and their viability and actual ability to deliver new homes in the plan period. Whilst regeneration of these sites should be supported by the Plan, lesser reliance should be placed on them as a key part of the Council's housing delivery strategy (and ability to meet minimum housing requirements).

3. Chapter 5: Sustainable, High-Quality Development

Strategic Policy SP1: Sustainable Development

- 3.1 Policy SP1 sets out the Council's overarching strategy for delivering high quality, sustainably designed development. The overarching objectives and principles set out are supported. The need and benefits of providing a sustainable development which incorporates high quality design, respects the local heritage, and improves active lifestyle is well understood.
- 3.2 It is also understood that Swindon sits in an area of severe water stress, and the need for liaison with Thames Water is understood, as is the need to secure energy capacity. We would note that connection capacity may be conditional on timescales set out by Thames Water and SSEN, connection capacity will be secured for development but may not be available until a specific date. Planning permission should not be held up until capacity is in place, consideration should be given to connection agreements and timescales provided by Thames Water and SSEN.
- 3.3 In this context a small amendment to section 4 is proposed:
- 3.4 4. The approval of new development will be conditional on the appropriate water infrastructure and energy capacity being ~~in place~~ secured. Developers should engage with Thames Water and SSEN (Scottish and Southern Electricity Networks) early in the planning process in line with Policies U1 and U2.
- 3.5 In this context it is considered that Policy SP6 aligns with national guidance and policy and is supported.

SD1: Effective Use of Land

- 3.6 Policy SD1 states that development proposals should make effective use of land through optimising density whilst being sympathetic to the surrounding environment. We would highlight that Windmill Hill Business Park provides an opportunity to accommodate residential development which makes best use of existing transport, drainage and green infrastructure and in this way, redevelopment of the site would support the aim of part 3(b) of the policy. This policy accords with principles set out in chapter 11 of the National Planning Policy Framework and is supported.

4. Chapter 6: Places for People

Policy SP2 - Homes for the Community

- 4.1 The emerging Local Plan sets out that the housing requirement calculated against the most up to date standard method is 1,205 homes per annum, a total of 24,100 homes over the 20-year plan period.
- 4.2 Turley has conducted a technical review of the emerging approach towards housing provision in Swindon, as set out in the draft Plan, to ascertain whether this is likely to meet both the overall need for housing and the specific need for affordable housing. The full report is enclosed at **Appendix 3**.
- 4.3 This review has outlined the consequences of this failure to deliver planned housing growth, with this likely to at least partly explain why:
- Population growth in Swindon has slowed, again by around a third, with the rate of growth in the core working age population also having nearly halved since 2011;
 - The borough has created fewer than 1,800 of the 19,600 jobs targeted by the existing Local Plan, making Swindon the worst performing economy of its size in the South West;
 - House prices have grown at an average rate of 4.5% per annum since 2011, having barely grown over the prior five years;
 - Housing affordability has worsened to a greater extent than seen regionally or nationally, at both the midpoint and entry level of the market; and
 - Fewer affordable homes have been provided, during a period in which more have also been lost through Right to Buy.
- 4.4 The Council rightly refers to the outcome of the standard method in stating that there is now a need for **at least 1,205 dwellings per annum** in Swindon. Setting this as the housing requirement, as the Council proposes, would implicitly aim to boost recent delivery by almost a third but would still aim below what was delivered prior to the current plan period (1,370dpa) or what was actually targeted by the existing Local Plan (1,466dpa).
- 4.5 These higher benchmarks could well be more reflective of the future need in Swindon, where the standard method is intended to provide only a minimum figure and the NPPF makes clear that authorities can set higher housing requirements to align with economic growth ambitions. The Council's own evidence suggests that provision in line with the standard method would not support what its advisors consider the '*realistic best-case scenario for economic growth*', termed '*super growth*', and nor by implication would it belatedly enable the even higher level of job growth that was targeted by the existing Local Plan. The Council appears to have been satisfied that aligning with the standard method would support more jobs than baseline forecasts suggest will be

created in Swindon, but those forecasts do appear pessimistic with at least one having since been markedly upgraded. The Council should aim to reflect this more positive context and reconsider whether job growth is likely to generate a greater need for housing than implied, as only a minimum, by the standard method.

- 4.6 The Council should also consider the extent to which its identified supply of housing sites – reportedly capable of providing circa 25,596 homes – will meet the evidenced need for affordable housing. As demonstrated in this report, the emerging trajectory would support the delivery of around 5,848 affordable homes over the plan period, equivalent to an average of only 292 dwellings per annum. This would result in a cumulative shortfall of around 974 homes even under best-case assumptions of full policy compliance and delivery.
- 4.7 The scale of this gap, coupled with evidence of worsening affordability, increasing use of temporary accommodation, and rising homelessness pressures, indicates that the draft Plan will not provide an effective or deliverable strategy for meeting identified housing needs without additional site allocations, stronger delivery mechanisms, or flexibility in tenure expectations to ensure viability and maximise affordable provision.
- 4.8 As currently drafted, Policy SP2 states that *‘the Council will seek to enable these (housing) targets to be met subject to all relevant policies of this Plan’*. This statement does not provide a clear and unambiguous commitment to meeting housing needs in full in line with the aims of national planning policy set out within the National Planning Policy Framework (NPPF). There is a clear national policy imperative to significantly boost the supply of housing, and so the Plan should more explicitly identify meeting the housing needs in full as one of the critical issues to be addressed. As a consequence any references to LHN within the plan should be referenced as a minimum/‘at least’ figure.
- 4.9 At present, the draft plan proposes to meet the Local Housing Need (LHN) over the plan period and the details of which sites will deliver various elements of the overall housing need is included in the site specific policies for the Strategic Growth Locations (Policies SGL 01- SGL06) and Urban Regeneration Areas (Policies UGA 01 and UGA 02) and in the Site Allocations listed at Appendix 1 of the draft plan. There is a lack of a clear summary set out within Policy of where the growth will be accommodated, particularly where it is to be accommodated on sites which are not ‘new’ to this plan. Some detail is included in the trajectory at Appendix 3 to the plan, and paragraphs 6.4 to 6.7 also detail the following;
- Net completions 2023/24 – 831 homes;
 - Planning permissions granted - 12,767 homes;
 - Residual need 10,502 homes, to be met by;
 - Rolled over Strategic Sites without planning permission – 3,498 homes;
and
 - New site allocations – 8,344 homes.

- Total 25,440 homes.
- 4.10 However in our view Policy SP2 should list and overview the sources of supply within the plan to explain clearly how the housing requirement will be accommodated.
- 4.11 The Housing Trajectory at Appendix 3 suggested that a total of 25,796 homes is projected to be delivered between 2023/24 and 2043/44. The sources of supply are as follows;
- Windfall sites – 2,818 homes;
 - Strategic Allocations (with permission) – 9,949 homes;
 - Strategic Allocations (without permission) – 3,498 homes;
 - New Site Allocations – 8,700 homes;
 - Total 25,796 homes.
- 4.12 Firstly, the above breakdown includes 200 homes in ‘year 21’ from New Site Allocations, i.e. beyond the emerging plan period. The total projected supply for the plan period, as set out within Appendix 3, is 25,596 homes. This should be more clearly set out in the table at Appendix 3.
- 4.13 Secondly, the total number of homes projected to delivery in Appendix 3 differs from the total sources of supply explained at paragraphs 6.4 to 6.7 of the draft plan. Clarity is needed on the number of homes projected to deliver from each source. A full detailed site specific trajectory should be provided setting out all sources of supply for the plan period with an annualised breakdown to set out when each site is projected to commence completions.
- 4.14 In addition, the total projected delivery within the plan period set out at Appendix 3 is only 1,496 homes above the (minimum) LHN figure, just 75¹ homes per annum above the minimum figure. This reflects a contingency in housing supply of just 6.2% over the plan period. Considering that circa 11% of the projected supply is from windfall sites (i.e. sites assumed to come forward based on assumptions rather than actual identified supply) we consider that insufficient sites have been identified to deliver a realistic prospect of the minimum housing requirement being delivered in the plan period.
- 4.15 To plan to just exceed the LHN by circa 6.2% is not in line with the national requirement to significantly boost the supply of housing. The housing requirement should be expressed as a minimum, and greater contingency needs to be built into the plan to enable adequate sites to be identified to ensure the minimum requirement is met, and to ensure that an adequate five year supply of deliverable homes is maintained over the plan period. The evidence base for the plan demonstrates that the Council is aware; in the Defining Growth section of the Interim Sustainability Report it is acknowledged;

¹ 74.8 homes per annum rounded up

However, and as discussed, there is also a need to remain open to the possibility of higher growth and, whatever the housing requirement, there is a need to identify a total supply comfortably above the requirement, i.e. a healthy 'supply buffer'. (paragraph 5.4.56)

- 4.16 At present the Council suggest that the vast majority of the requirement will come forward on sites which are existing commitments (Strategic Allocations with and without permission 13,447 homes), and on Windfall sites (2,818 homes). Together these elements comprise 67.5% of the supply. Given the current adopted plan period ends in 2026 it is noteworthy that over 13,000 homes appear to be relied on from Strategic Allocations which are not new to this plan; i.e. they were intended to come forward (we assume at least in part) as part of the delivery in the previous local plan period. Paragraph 6.6 of the draft plan confirms that 3,498 homes are included in the projected supply for the new plan from sites which were allocated for development in the previous plan but have not to date obtained planning permission. This is a clear indication that sites identified in a plan may not come forward as anticipated and that sufficient contingency needs to be built into future projections for delivery.
- 4.17 We do not dispute that these categories (i.e. existing commitments and previously allocated sites) can and should comprise an element of the housing delivery over the emerging plan period, but at present only new sites to meet 8,500 homes within the plan period are even being considered. This places an undue level of certainty that existing commitments will come forward as planned (particularly when many appear to be rolled over from the previous plan) and, even more difficult to predict, that a significant volume of windfall sites will also come forward.
- 4.18 The over reliance on these sources of supply, without any lapse rate/discount applied to them, compounded with the fact the overall spatial strategy is only just planning to meet the LHN without sufficient headroom built in, places the plan in a precarious position where, in our view, it is highly unlikely that the requisite number of homes will actually be delivered within the plan period. The failure to plan to deliver the area's objectively assessed needs as a minimum is contrary to the requirement for the plan to be Positively Prepared (paragraph 36 of the NPPF).

Recommendation

- 4.19 The summary of the trajectory at Appendix 3 should be amended to more clearly reflect the homes that will be delivered within the plan period to 2043, and those that are anticipated to deliver beyond the plan period.
- 4.20 A full detailed site-specific trajectory should be provided setting out all sources of supply for the plan period with an annualised breakdown to set out when each site is projected to commence completions.
- 4.21 The housing requirement should be expressed as a minimum, and greater contingency needs to be built into the plan to enable adequate sites to be identified to ensure the minimum requirement is met, and to ensure that an adequate five year supply of deliverable homes is maintained over the plan period.

5. Chapter 7: An economically thriving Swindon

FE2: Industrial Land

- 5.1 The Regulation 18 Local Plan Policies Map proposes to allocate Windmill Hill Business Park as an 'Industrial Location.' Draft policy FE2 Industrial Land (Scale and Location) seeks to safeguard and permit light industrial uses; industrial / heavy industrial uses and warehousing and distribution in areas designated as 'industrial locations.' It also states that Sui Generis development will usually be permitted in industrial locations if the use aligns with **the industrial purpose** of the area [our emphasis]. This implies that offices (class E development) would no longer be supported or sought to be retained by the emerging policy.
- 5.2 This is in contrast to the site's current designation as a "Key Employment Area," where the Business Park is subject to policy EC2 of the Adopted Swindon Local Plan 2026, which seeks to retain employment generating uses in Key Employment Areas and allows for development of B1, B2, B8² and sui generis employment generating uses.
- 5.3 This shift in terminology is highly relevant, because at present, the majority of buildings on the Business Park are in office use (class E) and there is currently no industrial use on site.
- 5.4 We contend that allocating Windmill Hill Business Park as an industrial location is a flawed strategy for a number of reasons, which we detail below.
- 5.5 Firstly the Business Park is not currently an industrial location, nor does it have an industrial purpose. The majority of the buildings on site are in office use (class E), with Galileo operated by Vodafone as datacentre (class B8); the day nursery (class E) and a historic windmill being the only exceptions. The datacentre is the only building that would comply with the intended use class for an industrial location and there are in fact no industrial uses on site.
- 5.6 Secondly, the site is not well suited to industrial uses. The Use Classes Order clearly differentiates class E(g) from classes B2 and B8 by stating that class E(g) comprises "Uses which can be carried out in a residential area without detriment to its amenity." The council has sought to set policy for such uses through its draft policy FE1 Office (scale and location) and to clearly identify separate industrial locations subject to policy FE2. Industrial uses may conflict with uses on the Business Park and there is a restrictive covenant against building industrial units with the adjoining landowner. Furthermore industrial uses could potentially conflict with neighbouring residential areas.
- 5.7 Thirdly, the council's own Employment Needs and Land Supply Study³ acknowledges that Windmill Hill is an out of town office location (see paragraphs 4.40 and 6.63 and table 12.4). Two of the undeveloped phases at Windmill Hill are identified in the supply at table 12.4 of the iceni report at 1.44 ha and 1.31 ha respectively. Table 12.4 states

² Changes to the Use Classes Order mean that class B1 is now superseded by class E(g)

³ IcenI (March 2025)

that they are suitable for office, as opposed to industrial. This indicates that the council has applied the designation incorrectly on the policies map and it does not reflect its own evidence base.

- 5.8 Finally, it is unclear whether there is demand for industrial land in this location. The iceni report identifies a total need for industrial and warehouse ranging from -20.4ha to 242.9ha. The report goes on to state that there is a clustering of scenarios around the 140ha to 170ha range and this would seem a reasonable level to plan for.
- 5.9 Table 13.1 sets out the supply and demand balance for office and industrial land. There is an oversupply of industrial land of 10.65ha. This is the case despite Windmill Hill not being included in the supply for industrial land (table 12.4). It therefore makes no sense to allocate Windmill Hill as an industrial location because it has not been factored into supply. Even without Windmill Hill in the supply, the Borough Council is forecast to have an oversupply of industrial land; a point that is acknowledged in the Interim Sustainability Appraisal at paragraph 5.2.27:

Employment land – in headline quantitative terms there is a need for new allocations to deliver office floorspace but not industrial land. However, there are also a range of important qualitative considerations, such that industrial land allocations remain a key matter warranting ongoing consideration as part of the local plan-making process. [our emphasis]

- 5.10 Taking account of these qualitative considerations, this has been translated into 640,000 sqm of industrial floorspace need in policy SP4 Fairer, Economic Growth.
- 5.11 Notwithstanding that Windmill Hill is not suitable for allocation as industrial location, we also contend that the site is no longer suitable for allocation as an office location, for the reasons set out below.
- 5.12 Firstly, there is a well evidenced trend of declining rates of office take up in both Swindon's town and out of centre office market. The surplus of office floorspace in Swindon has grown where demand for office floorspace has reduced following the Covid-19 pandemic. Analysis of commercial market data published by CoStar also indicates that fewer businesses have been taking up office space in Swindon since the onset of the pandemic, with the number of office lettings falling by a third since 2020.
- 5.13 The same data suggests that businesses have each also been taking over a fifth less space, with the average letting over the last five years comprising only 429sqm.
- 5.14 This significant change in market activity to some extent reflects a national change in working habits and the type of space employers are focussed on. The past five years have seen a vastly increased focus on working from home and hybrid working.
- 5.15 HTC also advise that the type of space being sought by employers looking to encourage their employees back into the office has also weighed heavily against business parks, which often lack amenities such as shops or restaurants and where buildings are generally designed to provide more functional, efficient spaces with all facilities provided on site.

- 5.16 Recent evidence published by Wiltshire Council⁴ acknowledges the changing nature of demand, including a growing preference for town centre locations, and in a Swindon context, the demand for smaller offices, and self-contained buildings. The same evidence also cites an ongoing need for Grade A office accommodation in the town centre to ensure this segment of the market is catered for.
- 5.17 Set within that broader context, there is a high and increasing level of vacancy at Windmill Hill Business Park. Some of the buildings are no longer fit for purpose and while others are (with considerable efforts by SMMC to refurbish and update the accommodation when it becomes available); take up has been poor.
- 5.18 Retaining Windmill Hill Business Park in its current format would evidently no longer meet modern business needs. Businesses are increasingly seeking smaller office premises than those that are available, where even the smallest unit is believed to offer some 1,930sqm of space.
- 5.19 Over recent years the high availability of stock in competing M4 corridor office markets has meant that regional demand for accommodation on the Park has diminished and the smaller scale nature of the local Swindon market has been insufficient to balance demand with supply meaning there is now considerable levels of vacancy on the park.
- 5.20 The two undeveloped plots on Windmill Hill are unlikely to come forward given the low level of interest in the site and a lack of potential for pre-lettings. As such they should be removed from the council's supply (table 12.4
- 5.21 SMMC continue to market the Business Park but their agent advises that there is little prospect of significant take up in the foreseeable future. With current leases expiring, an even higher level of vacancy is forecast in future years.
- 5.22 Finally, providing office space at Windmill Hill would conflict with the council's strategy of regenerating the town centre, which forms strategic objective SO1 and the Local Plan seeks to deliver through a raft of policies.
- 5.23 The recent publication of the Heart of Swindon Vision document reaffirms the Council's regeneration priorities for the town centre and actions being taken to encourage investment in high quality, carbon-neutral employment space in the heart of Swindon and creation of a 'Knowledge Centre', building on the success of Zurich's central office space.
- 5.24 Reinvigorating Swindon Town Centre remains an integral part of the emerging Local Plan's spatial strategy. The Council's latest assessment of office needs confirms a requirement for 72,000sqm of office space over the period from 2023 to 2043 with draft Policy FE1 directing major office development to Swindon Town Centre and/or along the NEV growth/transit corridor.
- 5.25 Take up in Swindon has historically been heavily biased towards the out of town Business Parks in favour of the Town Centre office buildings. In the period 2003-2024, an average of 72% of all take up being recorded in business parks rising to 80% in the

⁴ Wiltshire Employment Land Review Update, Hardisty Jones Associates (September 2023)

last 10 years. Take up in Swindon of office space peaked in 2007 with a total of 317,601 sq ft being taken up across the in and out of town markets with 82% of activity recorded in the out of town market. As a consequence of this imbalance in the office market, planning policy has sought to direct development to the town centre over recent years.

Recommendation

- 5.26 Windmill Hill Business Park should not be allocated for employment uses and the Policies Map should be updated to remove the 'Industrial Location' designation. We have set out above that the site is not suitable for industrial development. The site is also no longer suitable for retention as an office location because demand and take up is low and any application for new office floorspace above 1000 sq m would be contrary to current planning policy EC2(d) as it would be impossible to demonstrate a sequential approach to site selection.

6. Chapter 9: An environmentally sustainable Swindon

SP6: Climate Stability and the Environment

- 6.1 Policy SP6 sets out the Council's climate change and energy requirements for new development. This includes promoting climate resilience and incorporating adaptation measures and reducing energy demand and carbon emissions.
- 6.2 Delivering climate resilient, low carbon development is key to future development and is supported. The Government's strategy on the Future Homes Standard, as well as requirements set through national guidance and the Building Regulations put in place measures which support climate resilient design and reduce energy demand and carbon emissions. These changes are actively designed to support the UK Net Zero Agenda and 2050 Net Zero target.
- 6.3 The Future Homes Standard, once implemented, will require development to reduce energy demand and carbon emissions, achieving a c.75% carbon reduction beyond Part L 2013. In addition, development will no longer be able to use gas, or any other fossil fuel. The Future Homes Standard (FHS) envisages new development will make use of all-electric strategies, incorporating heat pumps to provide heating and hot water, and supporting the use of Solar PV to provide onsite energy generation.
- 6.4 In 2021 the Building Regulations were updated introducing Part O to require development to assess overheating for homes. This includes consideration of future climate scenarios.
- 6.5 In this context it is considered that Policy SP6 aligns with national guidance and policy and is supported.

CS1: Carbon Reduction and Sustainable Design in new development

- 6.6 Policy CS1 sets out the Council's strategy for carbon reduction and sustainable design in new development. This includes setting a number of sustainable design requirements around climate resilience, making use of zero / low carbon technologies, and enhancing energy efficiency. It also requires development to minimise energy consumption, minimise operational and embodied carbon emissions, and consider the BREEAM Community Standard.
- 6.7 The need for sustainable development and reducing carbon emissions is understood and supported. The Government's FHS, Future Buildings Standard (FBS) and related updates to the Building Regulations and other guidance, i.e. the use of climate change allowances in assessing flood risk provide a basis for delivering sustainable, climate resilient, and low carbon development.
- 6.8 In setting out this policy regard should be given to the December 2023 Written Ministerial Statement (WMS) which sets out clarity on the development and application of local energy efficiency standards in the context of advancing national

policy. The WMS notes that the introduction of Part L 2021 supersedes the 2015 WMS which set guidance for Local Authorities to not set energy efficiency standards beyond Code for Sustainable Homes Level 4. The WMS goes on to note that the 2025 Future Homes Standard (FHS) will mean, *‘that homes built to that standard will be net zero ready and should need no significant work to ensure that they have zero carbon emissions as the grid continues to decarbonise. Compared to varied local standards, these nationally applied standards provide much-needed clarity and consistency for businesses, large and small, to invest and prepare to build net-zero ready homes’*.

- 6.9 The WMS states, *‘the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale.’*
- 6.10 In this context elements of this policy which require development to ‘minimise’ emissions in relation to operational emissions and embodied carbon, by setting out open ended requirements, contradict the WMS and FHS requirements on operational emissions.
- 6.11 There are also implications on viability as an open-ended statement such as this is open to interpretation which is unlikely to have been fully considered at this stage. The Future Homes Hub report, Ready for Zero, prepared to inform the 2025 FHS sets out costs for a range of potential specifications to reduce operational emissions. ‘Minimising carbon emissions’ could result in significant additional costs. The Viability Assessment which accompanies the Plan sets out additional costs for scenarios beyond the FHS, and scenario CCS4, drawing on the Future Homes Hub reporting which includes, ‘minimising space and water heating’, is estimated to increase costs by c.19% beyond current Part L Regulations. Similarly in setting a requirement to ‘minimise embodied carbon’ leaves an open-ended requirement which could add significant cost to development and is not considered as part of the current viability assessment.
- 6.12 The evidence base includes the Swindon Carbon Inventory which provides background information to support the Plan. The Carbon Inventory sets out the baseline emissions for Swindon and evidence for setting local targets and integrating climate objectives into the Local Plan. While the Carbon Inventory identifies the scale of local emissions and challenges in reducing carbon emissions limited information is provided on the application of policy to reduce emissions from new development. No analysis has been included at this stage on potential interventions, alignment with the FHS and WMS, or including embodied carbon requirements.
- 6.13 In addition to the energy and carbon requirements noted above the Policy also includes requirements for non-residential development to achieve a BREEAM Excellent rating, and for residential development to consider the BREEAM Communities scheme. The use of BREEAM to assess non-residential development is well understood and supported, however, currently the evidence base does not reference BREEAM, and the viability assessment does not take account of the recent BREEAM update. Version 7 of

the BREEAM New Construction manual has recently been released and is expected to increase the requirements to achieve Excellent, in this context further analysis of costs is required to determine if this is suitable. With regards to the BREEAM Communities scheme this was first published in 2012 and while still available doesn't align well with changes in national guidance and policy. Furthermore, no consideration is given to this scheme as part of the current evidence base or viability assessment.

- 6.14 Any policies which go beyond the requirements of the Building Regulations need to be supported by an appropriate evidence base and costs included in the viability assessment. Until this is completed elements of the Policy as currently written are not considered to align with the requirements of the NPPF.
- 6.15 Below recommended amendments are set out to policy CS1.

Sustainable Design

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

Carbon Reduction

- 2. Development proposals should:
 - a) Reduce the energy consumption of the development by incorporating measures to reduce the impact of overheating/cooling and mitigate heat traps within the development including through a fabric-first approach, and
 - b) Reduce operational and embodied carbon emissions in the construction of development beyond current practice where feasible and viable;
- 3. All major non-residential developments are expected to achieve BREEAM excellent standards where feasible and viable.
- 4. All major residential-led mixed-use developments consider sustainability certification with the clear focus on resolving overall sustainability of the area.

CSE2: Whole Life Carbon Assessments (WLCA)

- 6.16 Policy CSE2 sets out a requirement for major development proposals to undertake a Whole Life Carbon Assessment (WLCA) as part of proposals, using the RICS

methodology. Typically, this would require the assessment of the upfront embodied carbon operational emissions, maintenance and end of life of each building proposed.

- 6.17 It is understood that as the FHS is introduced and development switches to electricity-based strategies the upfront embodied carbon of development remains a significant proportion of a development's lifetime carbon emissions. Understanding the upfront embodied carbon and reducing this is therefore a key consideration and undertaking a WLCA is supported.
- 6.18 However, it should be noted that undertaking a WLCA requires detailed information of house types proposed and is therefore only likely to be applicable for Full, or Reserved Matters applications. There will be insufficient information at the outline stage to provide a meaningful assessment. Furthermore, undertaking a WLCA increases costs and should only be undertaken on proposed house types, allowing an assessment to be made of the development as a whole as part of a proportionate approach. It is also not appropriate to consider maintenance and end of life emissions; these are ultimately a function and responsibility of the building owner. We would recommend that this policy focuses on the upfront embodied carbon of new development (Stages A1-A5), i.e. the materials and construction carbon which can be influenced by the developer.
- 6.19 It is noted that the viability assessment incorporates this policy into the assessment of Policies SP6 and CSE1, however, no direct cost allowances has been included for the preparation of a WLCA. As such, the policy needs to be updated, and a cost considered.
- 6.20 As noted above some minor amendments are proposed to this policy.
1. Major development proposals over 49 units, or 4,999 m² of floorspace are required to undertake whole life-cycle carbon assessments, focussing on upfront embodied carbon (Stages A1-A5) to support their proposals
 2. WLCA should be undertaken using the RICS Professional Standard as applicable at the time of the application and any applicable assessment template.

7. Chapter 11: Utilities

U1: Wastewater, Sewage Infrastructure and Water Supply

- 7.1 Policy U1 sets out requirements to ensure adequate water supply is available, as well as sewage capacity. It also sets out water efficiency requirements and rainwater harvesting and greywater use considerations.
- 7.2 As noted, it is acknowledged that Swindon is in an area of severe water stress and consideration needs to be made to ensure there is adequate infrastructure capacity, as well as giving consideration to measures to reduce capacity demand.
- 7.3 Alignment with the Building Regulations higher water efficiency standards for homes is supported, as is the provision of water butts in private outdoor space where this is feasible.
- 7.4 However, the requirements of part 10, which requires major residential development to incorporate rainwater harvesting and greywater recycling unless unviable or unfeasible is not considered suitable.
- 7.5 While the Water Cycle Study prepared to support the Plan considers measures to reduce water consumption in line with the higher efficiency target of 110l/p/d, and beyond, the Viability Assessment only considers the 110l/p/d target. Delivering rainwater harvesting and greywater use requires additional consideration as to whether this is feasible for residential development, and if this is viable.
- 7.6 The Viability Assessment references the Future Homes Hub prepared the Water Ready report to inform the Government's roadmap for water efficiency in new homes . This provides further context on enhanced water efficiency standards and potential costs for incorporating rainwater harvesting and greywater use at £1,000 - £3,350 for residential development. The viability assessment only includes an uplift cost of £7 per dwelling. The requirement to match minimum drought frequency has also not been adequately considered and is not likely to be suitable.
- 7.7 We would note that the introduction of rainwater harvesting, and grey water is also likely to have impacts on internal space, occupier maintenance and increasing occupier costs. The need for additional space should be considered in the context of other design requirements, including the requirements of Policy CS1 which would also have internal space requirements for ventilation systems as it is currently written.
- 7.8 We would note that the Government is currently consulting on Water Efficiency Standards which consider lowering the optional higher target to 100l/p/d and we would recommend that the policy is linked to the outcome of that consultation and review of the Building Regulations.
- 7.9 In this context we would recommend the following amendments.

8. All new residential developments should be designed so that water use does not exceed 110 l/person/day, or subsequent updates to the Building Regulations higher

water efficiency standard. To demonstrate compliance with the requirements, applications must be set out the estimated water consumption of the proposal using the 'Water Efficiency Calculator' template.

10. On major residential developments, and commercial developments over 4000m³, water re-use technologies for rainwater harvesting and greywater recycling, or other water use technology should be considered where feasible and viable. U3: Energy Networks

- 7.10 Policy U3 reiterates part of Policy SP1 requiring grid capacity is available and also requires major development to consider on-site renewable and / or sustainable solutions.
- 7.11 The importance of capacity for development is understood. However, and noted connection capacity may be conditional on timescales set out by SSEN, connection capacity will be secured for development but may not be available until a specific date. Planning permission should not be held up until capacity is in place.
- 7.12 The introduction of the FHS will require development to incorporate low carbon renewable energy and sustainable on-site solutions.
- 7.13 The objectives of this policy are supported.

8. Conclusions

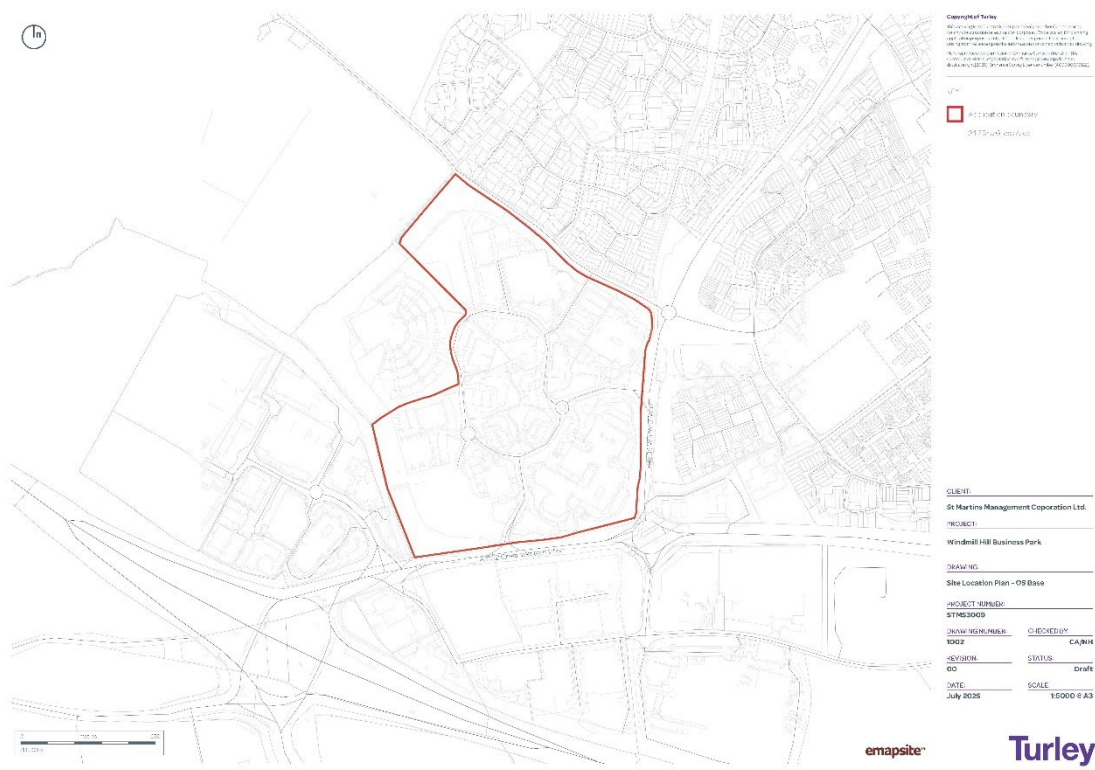
- 8.1 We are grateful to the Council for providing the opportunity to influence the new Local Plan at this early stage of its preparation. As we have explained in these representations, the Council should plan to treat its local housing needs, as calculated using the standard method, as a minimum. The Technical Review of Housing Needs at **Appendix 3** sets out clearly that identified needs are likely to be higher in light of the need to support more job growth and tackle worsening affordability. As such the council should reassess its housing needs, using the standard methodology as a starting point and taking into account a range of other factors.
- 8.2 There is a well publicised national housing crisis and the Government has sought to address this through the planning system with its objective of significantly boosting housing supply. It aims to deliver 300,000 new homes per year, with the quantum dispersed among LPAs using the standard method. Swindon Borough Council must play its part in meeting this objective by delivering its full housing need on deliverable sites.
- 8.3 It is clear that in order to meet the Council's full housing need that a range of sites will need to be allocated for development. The current strategy which places a heavy reliance placed on town centre regeneration sites in the Regulation 18 consultation draft is likely to result in Swindon falling short of meeting housing needs over the plan period, and particularly in the first five years.
- 8.4 It is unclear why the Regulation 18 Consultation Local Plan introduces a draft policy (FE2) which allocates Windmill Hill for industrial uses and seeks to restrict development to B2, B8 and sui generis uses (notably excluding office development), when the site currently operates as an office location.
- 8.5 Parts of the site are no longer fit for purpose and it has a high and increasing level of vacancy. Retaining the site for employment use is also not compatible with the Local Plan's strategic objective SO1 – Regenerating Swindon Town Centre. Accordingly Windmill Hill Business Park should be released from employment designation.
- 8.6 The site is located entirely within the urban area, where the principle of development is accepted and it is in close proximity to a range of services and facilities. This makes it's a good option to assist with meeting local housing needs.
- 8.7 If redeveloped, the site could deliver in excess of 600 new homes, on a mixed use site, with some of the more suitable employment provision being retained, ensuring good placemaking and urban design. The site's location and pre-existing infrastructure makes it particularly suited to early delivery of housing and it is capable of delivering much needed family sized and affordable homes.
- 8.8 Development on the site would make the best use of existing infrastructure and would enhance the site's green infrastructure, conserving and enhancing biodiversity. The site is already well connected but redevelopment would allow for the enhancement of active travel provision, promoting health and wellbeing.

8.9 Development of this site would make a substantial contribution towards achieving the strategic objectives outlined in the consultation draft Local Plan including:

- SO2 – Place and Belonging
- SO3 – Homes for All
- SO4 – Economic Prosperity
- SO5 – Connected Communities and Sustainable Movement
- SO6 – Low Carbon
- SO7 – Health and Wellbeing

8.10 SMMC would welcome the opportunity to further discuss its proposals for Windmill Hill with the Council and look forward to inputting to the preparation of the Regulation 19 Local Plan.

Appendix 1: Site Location Plan



Appendix 2: SHELAA Site Submission Form

Call for sites 2025

- To inform the New Swindon Local Plan 2043
- Before submitting your site, please check the SHELAA map and check to see if it is an existing site with an existing reference number
- Please send this completed form alongside a red line site plan to:
 - SwindonLocalPlan2043@swindon.gov.uk

Table 1 - Your details

Your details	
Name	Alison Young
Email address	
Business name (if applicable)	Turley
Are you the landowner or an agent acting on behalf of the landowner?	Agent

Table 2 - Site details

Site details	
What type of submission is this	A. New site
Site name	Windmill Hill Business Park
Site address	Whitehill Way, Swindon, SN5 6QR
SHELAA ref (if resubmission)	N/A
Easting	410665
Northing	183467
Gross area (ha)	24.7ha
Current land use	Offices, Nursery, Datacentre, Windmill

Proposed land use(s)	Mixed use – residential, offices, nursery, windmill
Names of all landowners	St Martin's Management Corporation
When will the site be available for development?	Phased development to begin within the first five years
List any strong development constraints that you think would impact the viability of developing the site	None

Appendix 3: Technical Review of Housing Needs in Swindon

Technical Review of Housing Needs in Swindon

October 2025



Turley

Contents

1.	Introduction	1
2.	Context for the New Local Plan	2
3.	Introducing the Council's Proposed Approach	12
4.	Economic Implications	15
5.	Implications for Affordable Housing	20
6.	Summary and Conclusions	34
Appendix 1: Five Year Housing Land Supply Annex's (Turley analysis)		36
Appendix 2: New Site Allocations Breakdown (Turley analysis)		50

1. Introduction

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

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

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

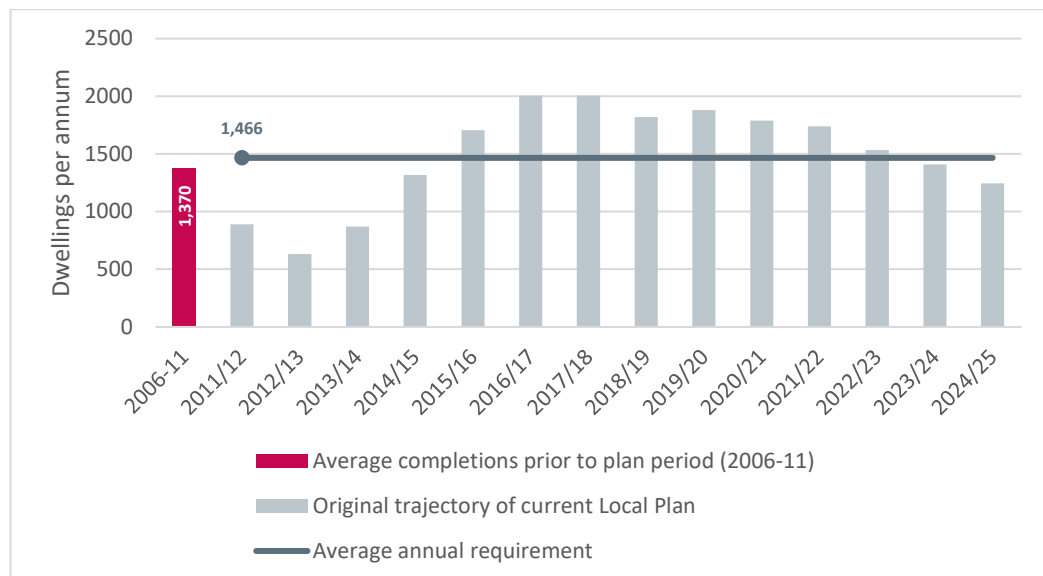
2. Context for the New Local Plan

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

Housing delivery falling short

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

Figure 2.1: Adopted Requirement and Intended Housing Trajectory



Source: Swindon Borough Council; MHCLG

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

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

⁴ *Ibid*, paragraphs 3.23 and 3.24

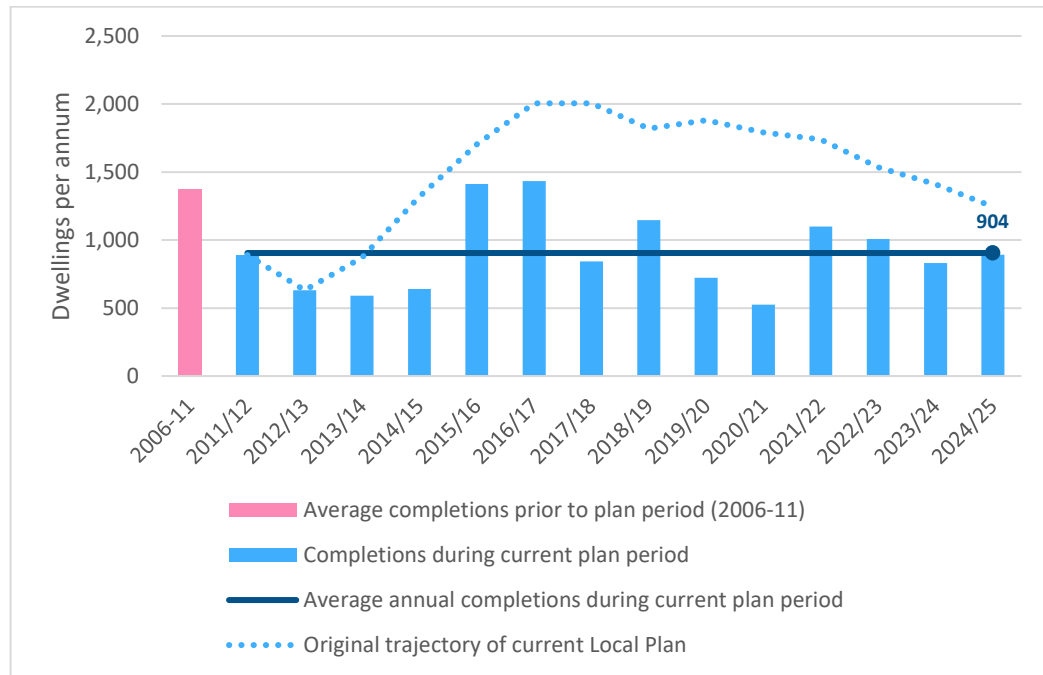
⁵ *Ibid*, Appendix 5

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

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

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

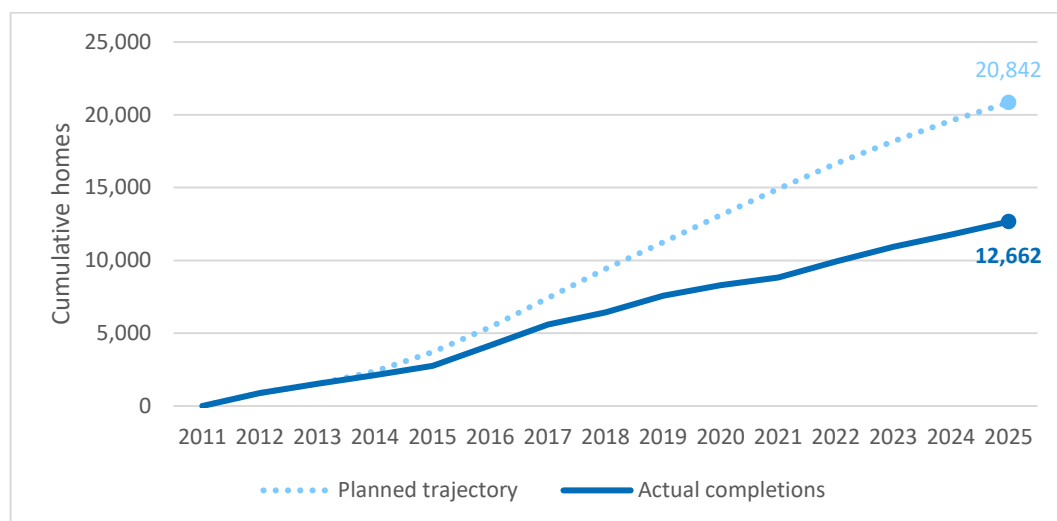
Figure 2.2: Completions vs. Previous Delivery and Planned Trajectory



Source: Swindon Borough Council; MHCLG; Turley analysis

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

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

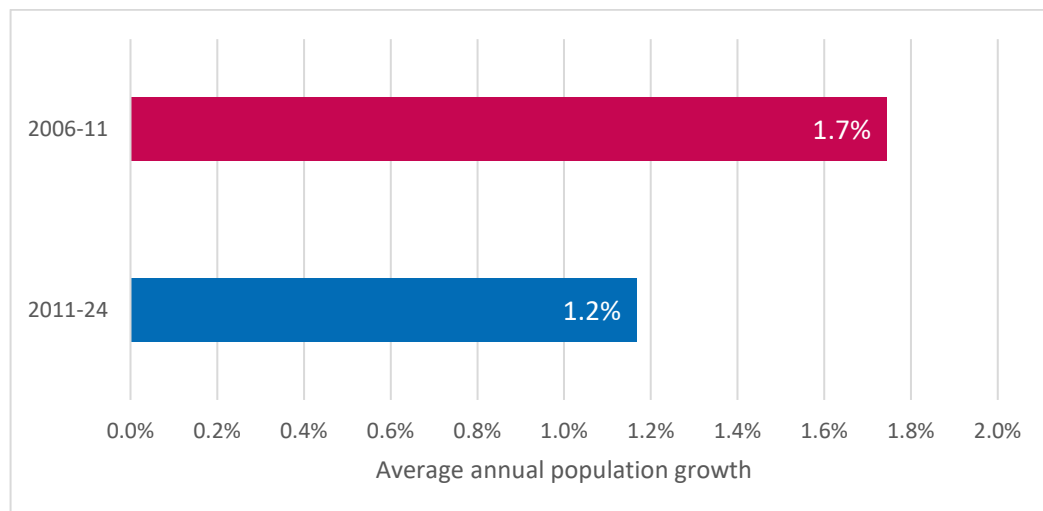


Source: Swindon Borough Council; MHCLG

Slowing population growth

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

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



Source: ONS

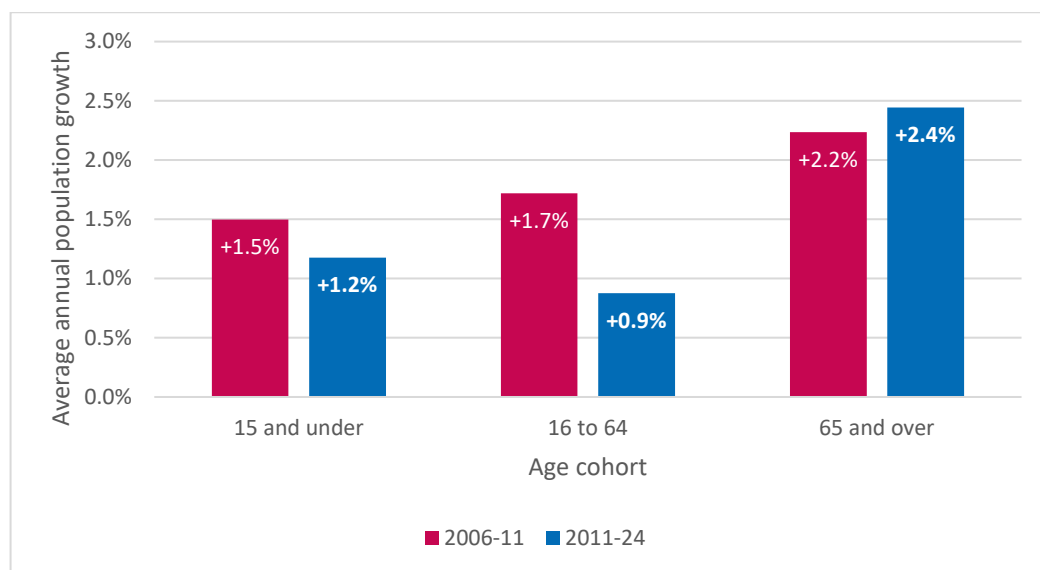
- 2.8 The slowdown has been even more pronounced for the working age population, aged 16 to 64. While this too was previously growing at a rate of 1.7% per annum over the five years to 2011, it has since grown barely half as quickly at an average rate of only 0.9% per annum¹⁰. The ageing of the population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

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

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

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

Figure 2.5: Benchmarking Average Annual Population Growth by Age Cohort



Source: ONS

Limited job growth

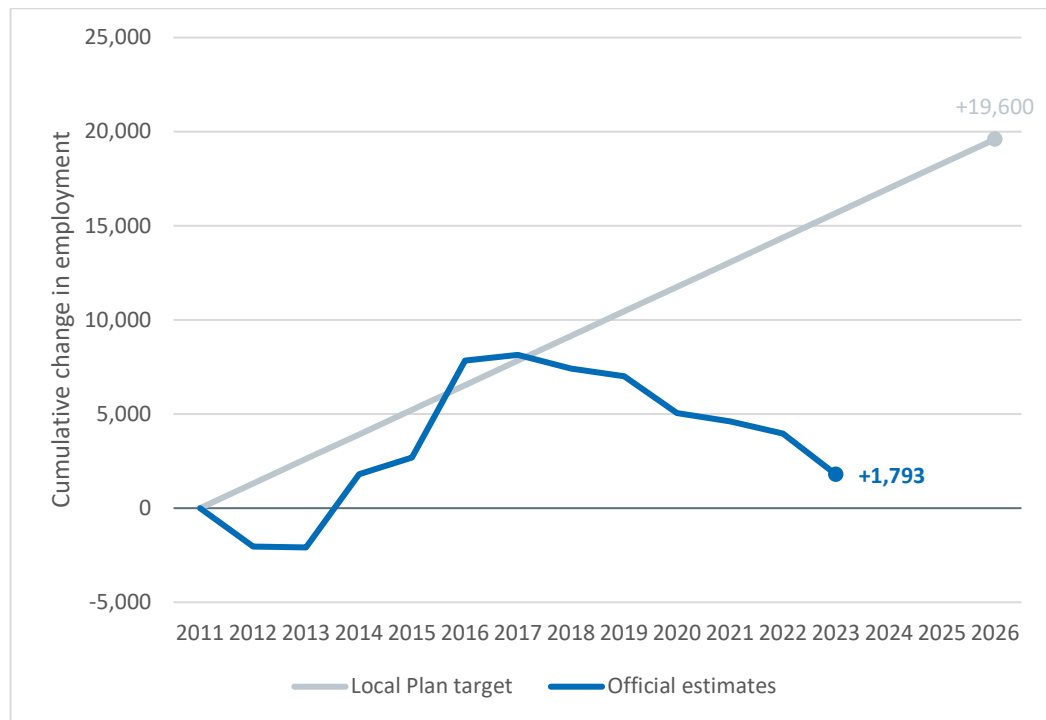
- 2.9 The slowing growth of the working age population will have likely squeezed the local labour market, with the near-halving of the unemployment rate a further sign of the growing lack of latent labour in Swindon¹¹.
- 2.10 This will have almost certainly contributed towards the borough's relatively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

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

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

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



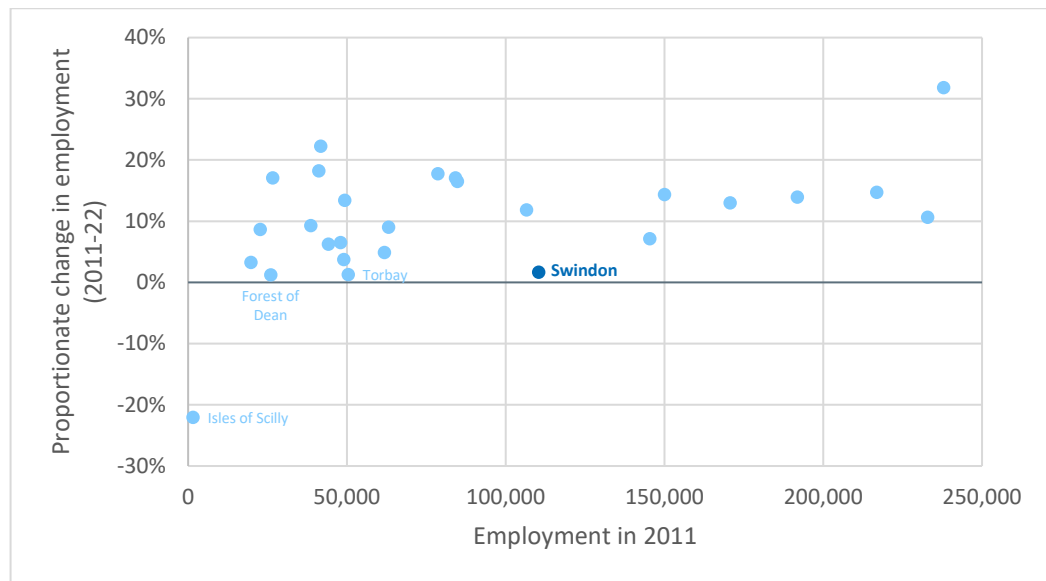
Source: Swindon Borough Council; Business Register and Employment Survey

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

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

Figure 2.7: Comparing Proportionate Employment Growth in the South West



Source: BRES; Turley analysis

Worsening affordability

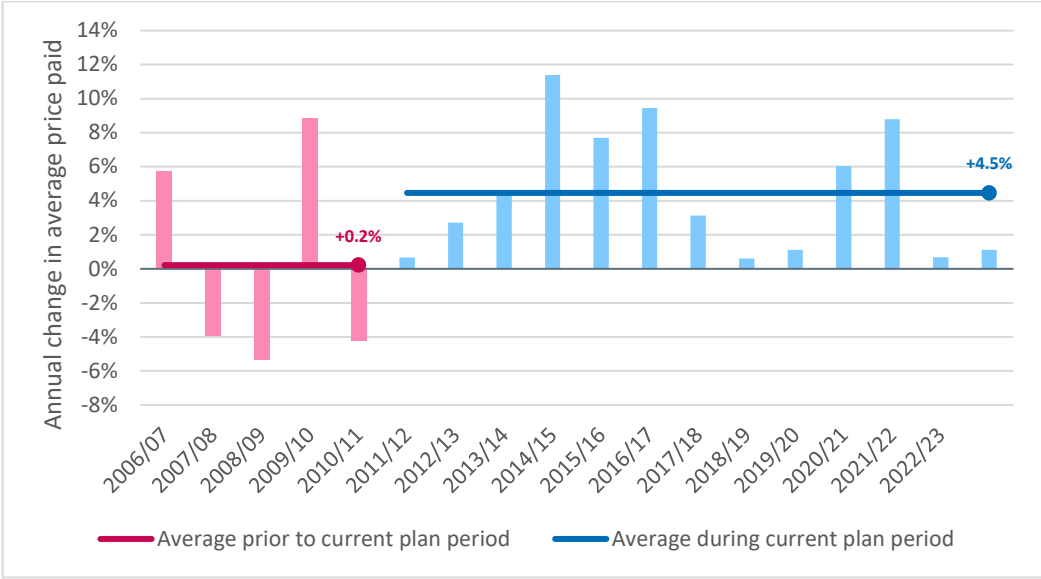
- 2.12 Failure to deliver planned housing growth in Swindon appears to have also put pressure on house prices, which are widely acknowledged to provide an indication of the balance between supply and demand¹⁴.
- 2.13 Data published by the Land Registry indicates that the average price paid for housing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

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

¹⁵ Land Registry (2025) Price paid data

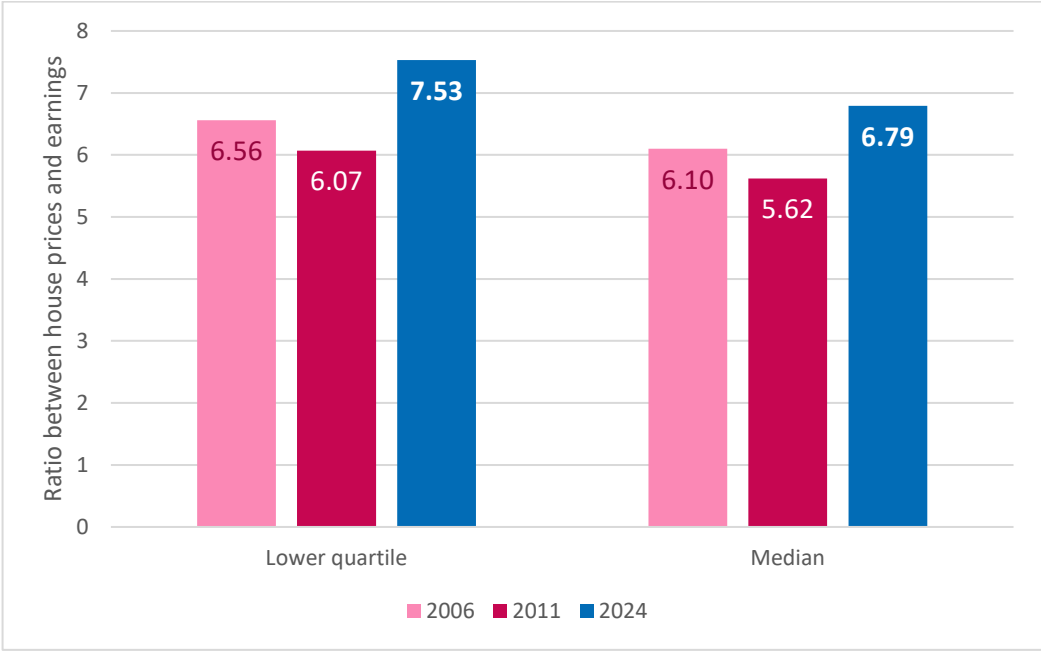
Figure 2.8: Annual Change in the Average Price Paid for Housing in Swindon



Source: Land Registry; Turley analysis

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

Figure 2.9: Lower Quartile and Median Affordability Ratios for Swindon

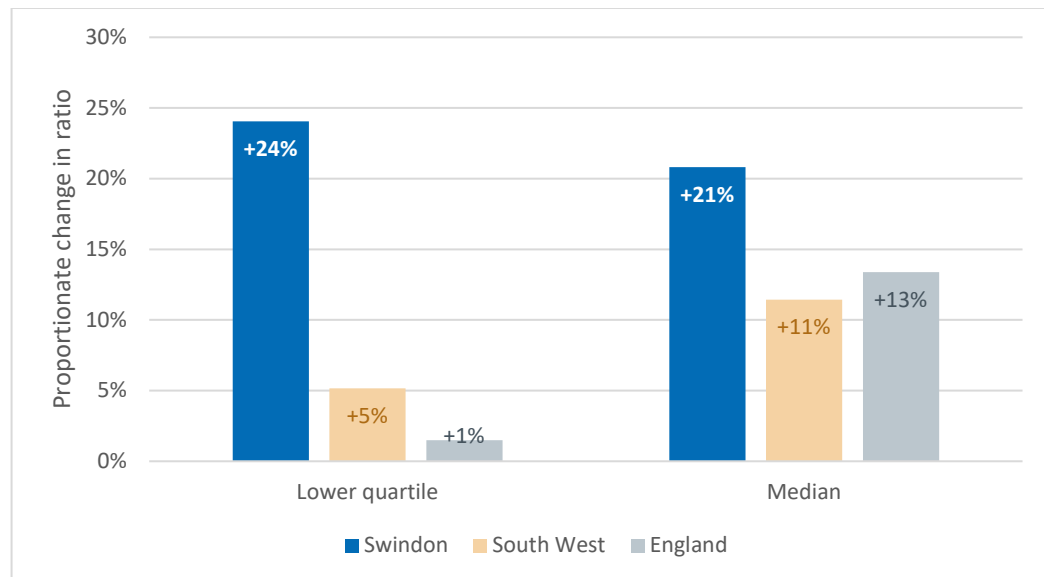


Source: ONS

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

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

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



Source: ONS

Few new affordable homes

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

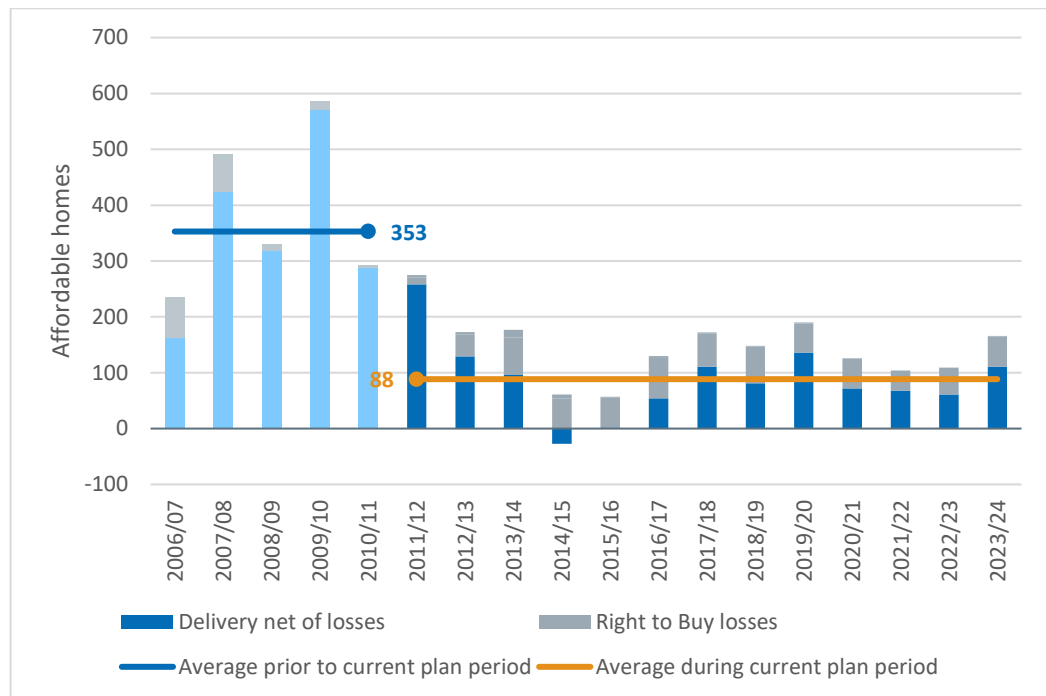
¹⁷ MHCLG (June 2024) Live Table 1008C: Total additional affordable dwellings provided by local authority area – completions

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

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

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

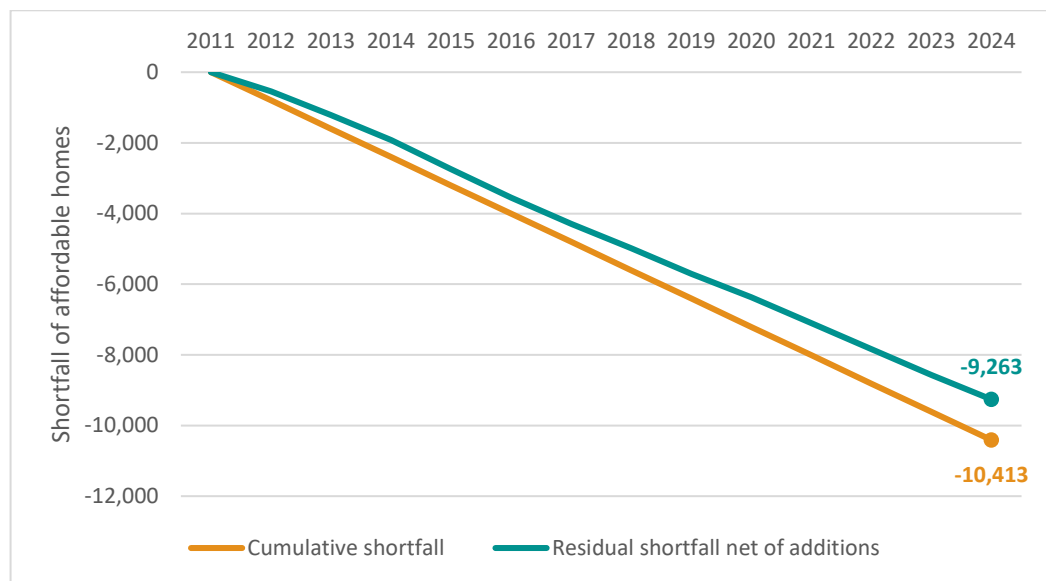
Figure 2.11: Affordable Housing Delivery and Losses through Right to Buy



Source: MHCLG

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

Figure 2.12: Cumulative Shortfall of Affordable Housing



Source: Swindon Borough Council; MHCLG; Turley analysis

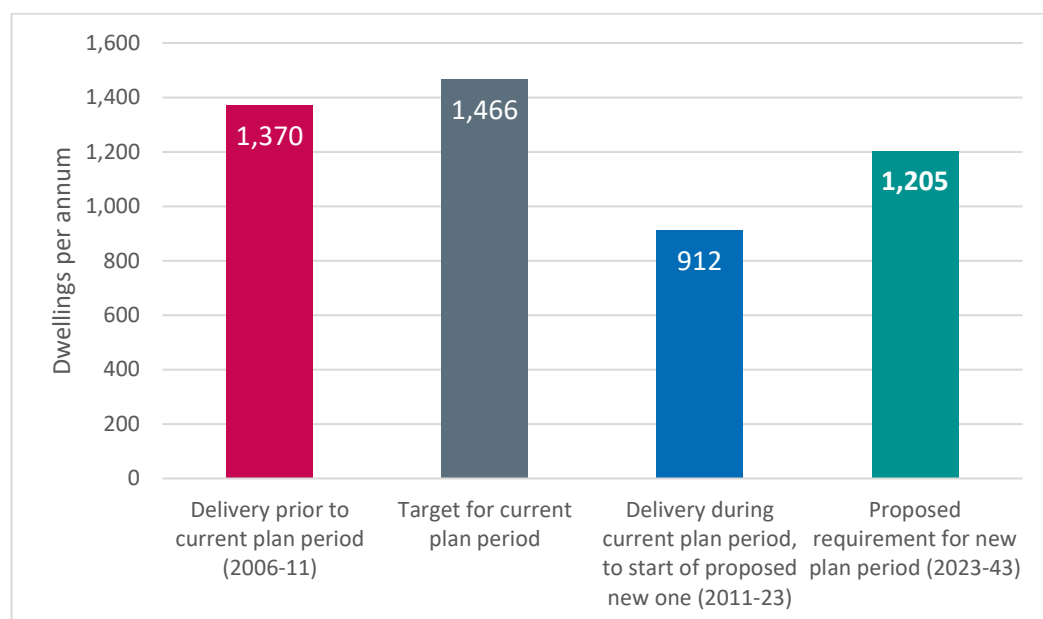
Summary

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

3. Introducing the Council's Proposed Approach

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

Figure 3.1: Benchmarking Proposed Housing Requirement



Source: Swindon Borough Council; MHCLG; Turley analysis

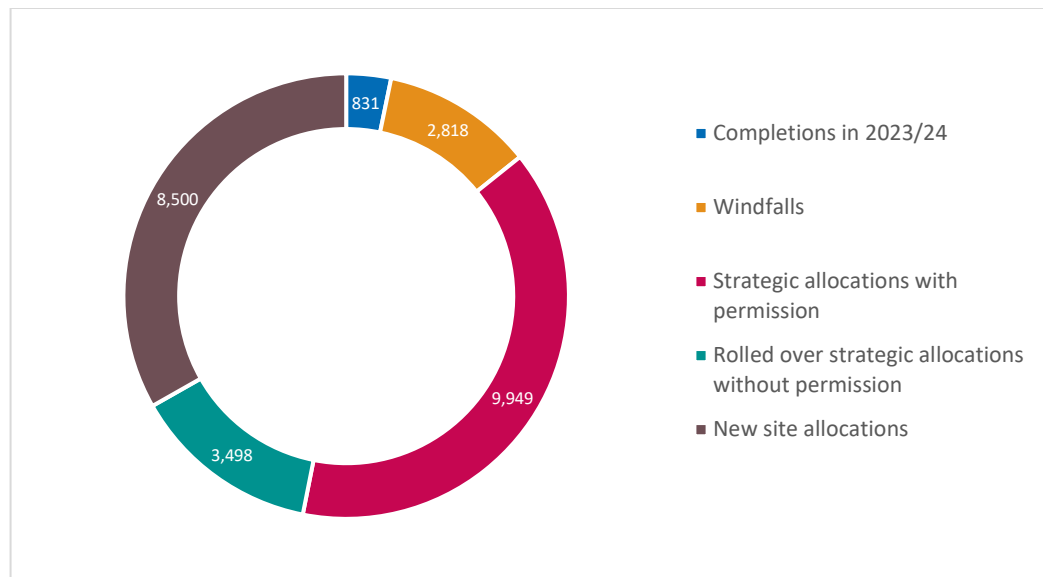
- 3.4 The Council assumes that existing planning permissions will meet more than half of the identified need, adding to homes that are known to have already been completed in the

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

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

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

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



Source: Swindon Borough Council

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

²³ *Ibid*, paragraph 6.5

²⁴ *Ibid*, paragraph 6.6 and Appendix 3

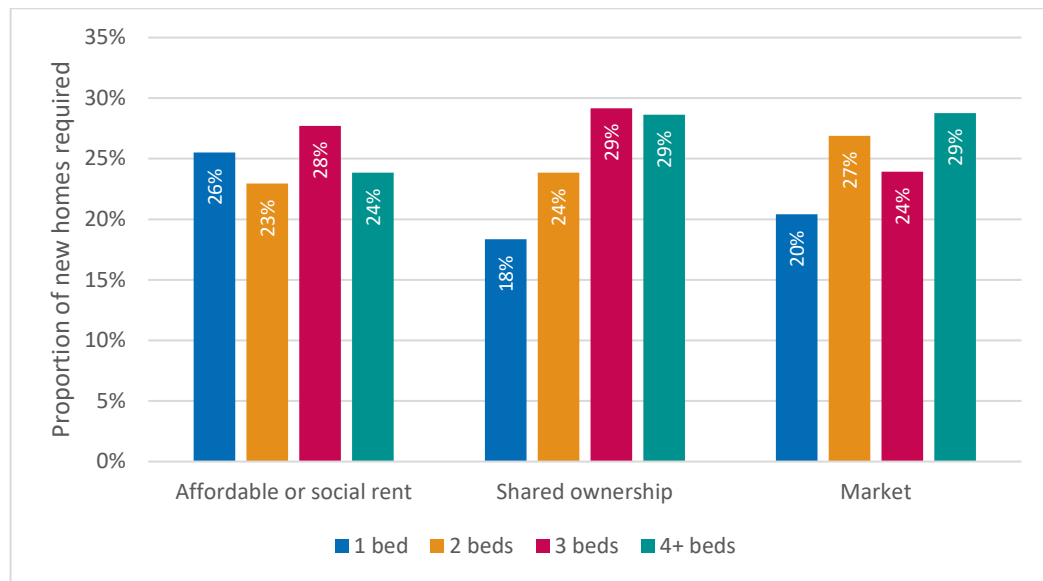
²⁵ *Ibid*, Appendix 3

²⁶ *Ibid*, p53

²⁷ *Ibid*, p52

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

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



Source: HDH Planning and Development

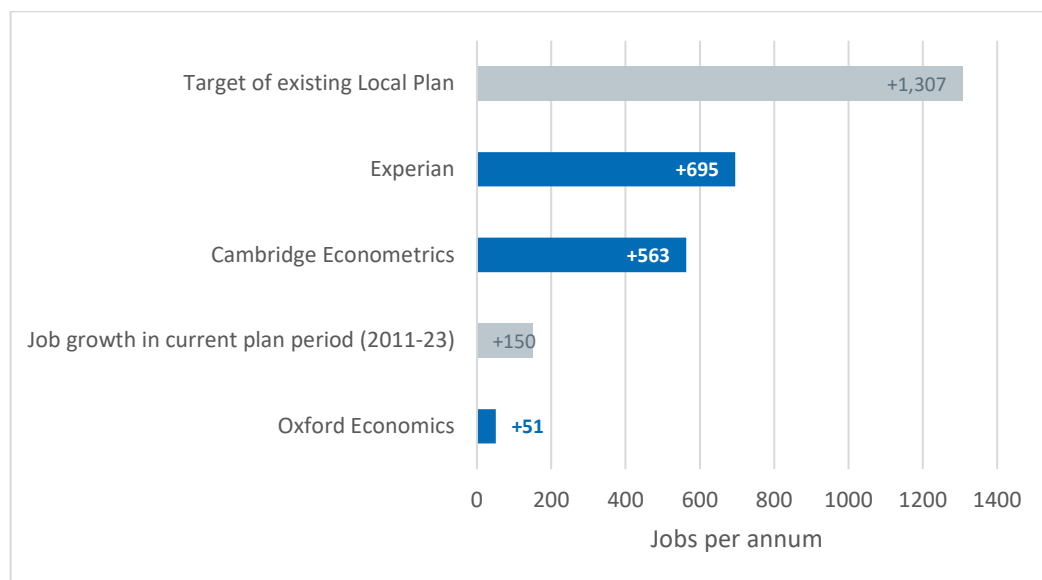
Summary

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

4. Economic Implications

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

Figure 4.1: Benchmarking Forecast Employment Growth in Swindon



Source: Turley analysis

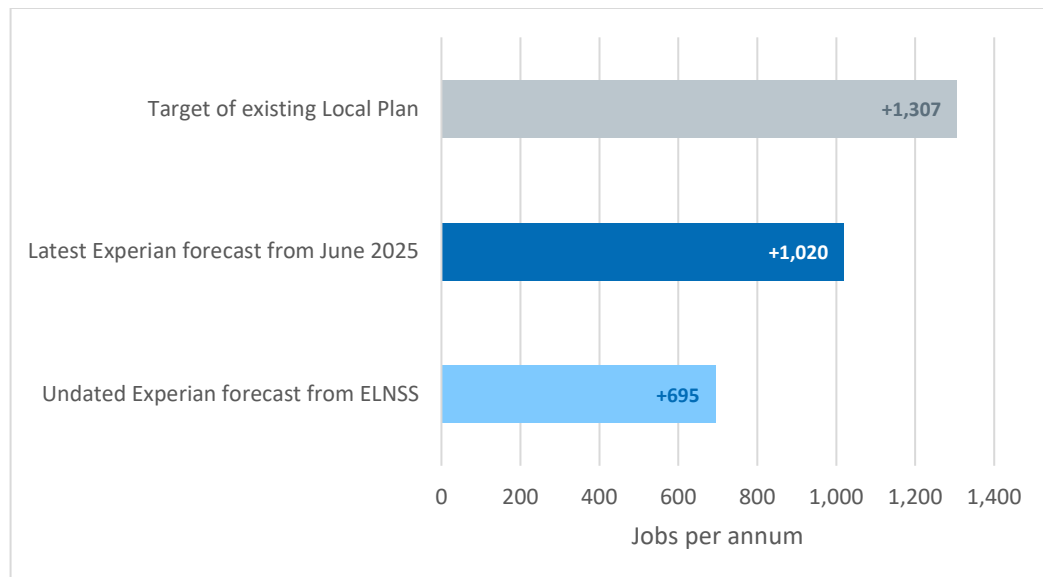
²⁹ Icen Projects (March 2025) Swindon Employment Needs and Land Supply Study, paragraph 1.52

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

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

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

Figure 4.2: Introducing the Most Recent Experian Forecast



Source: Experian; Swindon Borough Council

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

³² *Ibid*, p153

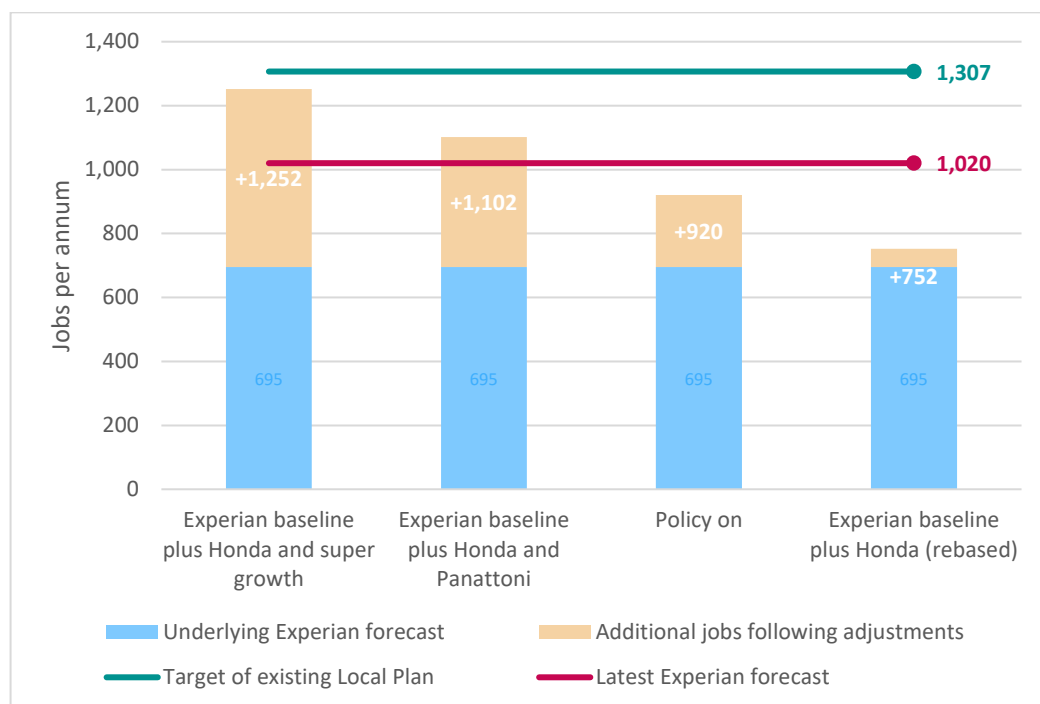
³³ *Ibid*, paragraph 10.21

³⁴ *Ibid*, p149

³⁵ *Ibid*, paragraph 10.26

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

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



Source: Icen Projects; Turley analysis

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

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

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

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

³⁷ *Ibid*, p73

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

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

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

³⁹ *Ibid*, p36

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

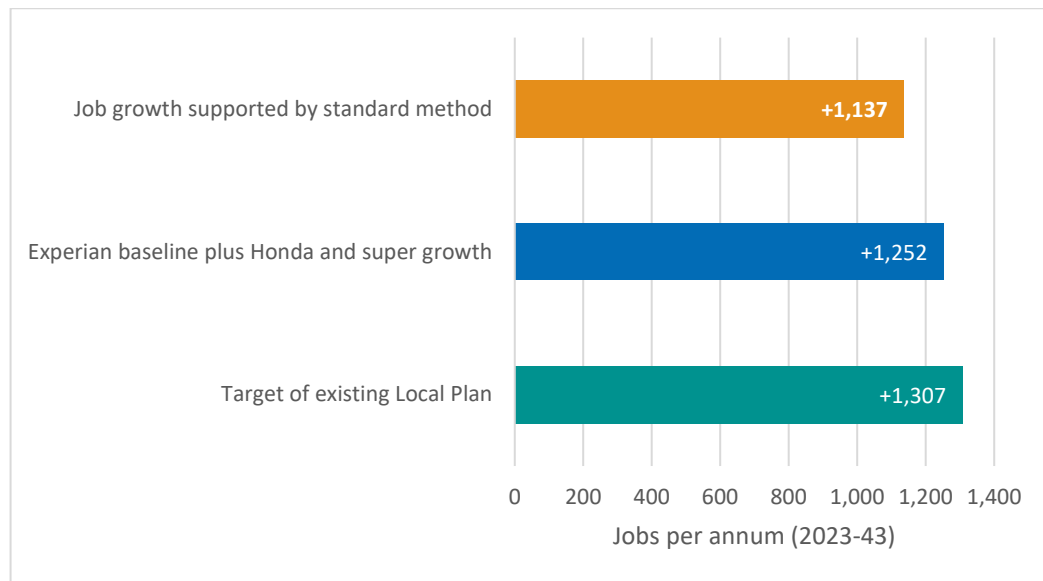
⁴¹ *Ibid*, p8

⁴² *Ibid*, p9

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

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

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



Source: Icen Projects; Turley analysis

Summary

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

5. Implications for Affordable Housing

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

Emerging Development Plan and Evidence Base

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

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

⁴⁵ Document reference 02.03

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

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

Affordable Housing Delivery to Date over the Plan Period

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

⁴⁶ $7,171 / 20 = 358.55$

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

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

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

Source: MHCLG; Turley analysis

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

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

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

Source: MHCLG; 2025 LHNA; Turley analysis

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

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

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

⁵⁰ 248 / 5 years = 49.6 + 359 = 408.6

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

Likely Housing Supply over the Plan Period

- 5.22 The Housing Trajectory at Appendix 3 Regulation 18 consultation document suggests that a total of **25,796 dwellings** are projected to be delivered between 2023/24 and 2043/44. The sources of supply are as follows:
- Net completions (2023/24) – 831 homes
 - Windfall permissions (2024/25 to 2038/39) – 2,818 homes
 - Strategic Allocations with permission (2025/26 to 2039/40) – 9,949 homes
 - Strategic Allocations without permission (2025/26 to 2039/40) – 3,498 homes
 - New Site Allocations (2027/28 to 2043/44) – 8,700 homes
- 5.23 The above breakdown includes 200 dwellings from new site allocations projected for delivery in ‘year 21’, which falls beyond the 2023/24 to 2042/43 plan period. Accordingly, the total projected supply within the plan period – referenced in the earlier section 3 – stands at **25,596 dwellings**. This distinction should be made explicit in Appendix 3 to avoid confusion regarding the timing of delivery. In addition, the ‘new site allocations’ figure of 8,700 homes in Appendix 3 differs from the total of 8,344 homes stated from this source in paragraph 6.6. This inconsistency should be corrected in the final version of the plan.
- 5.24 It is also noted that a site-by-site housing trajectory for the sources of supply listed in Appendix 3 was not originally published as part of the Local Plan evidence base. Turley sought this information from the Council during the consultation period. On 3 October 2025, the Council subsequently published a site-by-site trajectory⁵¹ for the new allocations, indicating a supply of 8,499 dwellings up to the end of the plan period in 2042/43 and a further 200 dwellings in ‘year 21’, broadly⁵² consistent with the total set out in Appendix 3.
- 5.25 In respect of the remaining components of supply, the Council confirmed that the Five-Year Housing Land Supply (5YHLS) Annexes (2025–2030) set out site-level information for windfall permissions and rolled-over strategic allocations (both with and without planning permission) from the adopted Local Plan (2026). The 5YHLS indicates that in the 2024/25 monitoring period 505 net dwellings were completed⁵³, which falls below the 778 dwellings expected for this period in the Appendix 3 trajectory.
- 5.26 The 5YHLS anticipates a total supply of **6,456 dwellings** over the five-year period from 1 April 2025 to 31 March 2030 from the following sources of supply:

⁵¹ Document reference 03.08

⁵² Difference of 1 dwelling

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

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

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

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

Source: Swindon Borough Council; Turley analysis

*figures do not sum due to rounding

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

Projected Affordable Housing Supply over the Plan Period

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

⁵⁴ 30% of 8,499 = 2,545.5

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

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

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

Source: Swindon Borough Council; Turley analysis

*figures do not sum due to rounding

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

⁵⁵ 5,848 / 20 years = 292.4

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

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

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

Source: Swindon Borough Council; 2025 LHNA; Turley analysis

*figures do not sum due to rounding

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

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

Other Material Considerations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Summary

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

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

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

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

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

6. Summary and Conclusions

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

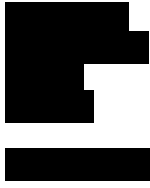
T232	South Marston Phase 9 (Taylor Wimpey) (see footnote 3)	Erection of 134 dwellings and provision of public open space with associated infrastructure and earthworks (layout, scale, appearance and landscaping) - Reserved Matters from previous outline permission S/OUT/13/1555.	SOUTH MARSTON	S/OUT/13/1556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

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

Appendix 2: New Site Allocations Breakdown (Turley analysis)

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

Turley





Respondent No: 332

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title

Mr

Q2. First Name

Guy

Q3. Last Name

Wakefield

Q4. Job Title (where relevant)

Planning Partner

Q5. Organisation (where relevant)

Ridge and Partners LLP on behalf of Mic Mac Strategic Land

[REDACTED]

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

SBC admin note: Please see attached response.

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

RIDGE

**REPRESENTATION TO SWINDON
LOCAL PLAN 2023 - 2043:
REGULATION 18 CONSULTATION**
MAC MIC STRATEGIC LAND
13/10/2025

1. INTRODUCTION

- 1.1 This response has been prepared by Ridge and Partners LLP on behalf of Mac Mic Strategic Land to the Swindon Local Plan 2023–2043 Regulation 18 consultation.
- 1.2 The 2023-2043 Local Plan will replace the current Swindon Local Plan 2026, and aims to set a strategic vision for housing, employment, infrastructure, transport and the environment to support sustainable growth that meets the needs of residents, businesses and the community.
- 1.3 Mic Mac Strategic Land are promoting Land at Pry Farm, Swindon ('the Site'). Whilst the land falls within the administrative boundary of Wiltshire Council, it is located to the immediate west of Swindon Urban Area. Representations have previously made to the Regulation 18 and Regulation 19 consultations for the Swindon Borough Plan 2036, which did not proceed to submission. Submissions have also been made to the Swindon Call for Sites.
- 1.4 This representation begins by setting out the background to the Site and its suitability, before going on to comment on the strategy proposed within the Regulation 18 Consultation, and its evidence base.

2. LAND AT PRY FARM, SWINDON

Site Context

- 2.1 The Site is situated within the administrative boundary of Wiltshire Council. It is located to the immediate west of the Urban Area of Swindon, and the south-west of Tadpole Garden Village. The Site's eastern boundary immediately abuts the administrative boundary for Swindon Borough Council.
- 2.2 The site is approximately 101 hectares and consists of agricultural land, split broadly into four quadrants, separated by the B4553 and Collins Lane.
- 2.3 The Site is bounded to the south by the Swindon to Gloucester railway line and to the southeast by Moulden Hill Country Park. The River Ray and Purton Woods adjoin the Site to the east, as well as the Swindon and Cricklade Heritage Railway, and beyond that lies existing development forming part of the Urban Area of Swindon. To the northeast lies and west lies further agricultural fields and blocks of woodland. Tadpole Garden Village is located approximately 1km north-east of the Site.
- 2.4 The Site is generally flat and low lying within the floodplain of the River Ray. Land rises to the south towards Peatmore and Purton where the elevation rises to c. 130m. There are also several isolated and localised hills to the north-east at Down Farm and Folly Farm, to the south-east is Mouldon Hill Country Park and a small hill within the south-east part of the site upon which sits a Pill Box.
- 2.5 The site is generally flat and free from significant constraints. It is well contained by hedgerows, woodlands and linear tree belts, with a strong field pattern providing enclosure to individual parcels within the site. There is limited visibility into the site from higher ground to the south-west at Purton.
- 2.6 Given the Site's location to the north-west of the built-up area of Swindon it clearly forms a logical location for a new, sustainable community to meet Swindon's housing needs. It is also evident that the Site is visually and functionally more closely related with the Urban Area of Swindon, than it is with Wiltshire.

Accessibility

- 2.7 The Site has excellent links to the strategic road and rail network. Swindon Train Station is situated approximately 5.2km south-east of the Site which is accessible via bus services that run from nearby residential areas.
- 2.8 The B4553 which runs through the centre of the Site provides direct access to Swindon both northbound and southbound. In terms of distance, the Site lies approximately 5.5 km from the centre of Swindon.
- 2.9 More closely, the south of the Site sits within proximity to the neighbourhood of Peatmoor in Swindon. That neighbourhood contains a number of services and facilities including a primary school,

an academy, a veterinary practice, doctor's surgery, a Co-operative and restaurant, and several bus stops providing regular services to the centre of Swindon and the train station.

- 2.10 Further south, approximately 5.3 km in distance, lies Junction 16 of the M4 providing direct access to London eastbound and Bristol westbound. Further north is the A419, approximately 6.3 km in distance, providing access northbound to Gloucester and Cheltenham.
- 2.11 Overall, there is a good range of everyday services and facilities within proximity to the Site which could be accessible from the Site via sustainable transport choices that are already available for neighbouring development.

Other Key Planning Considerations

- 2.12 There are no overriding planning constraints that would impact on the development of the site. The following constraints/planning matters can be mitigated against as part of the masterplanning of the site:
- Flood Risk - Parts of the site near the River Ray fall within Flood Zones 2 and 3. These areas of the site will be areas of public open space, rather than built development. The development can integrate sustainable drainage design incorporating swales, rain gardens, infiltration features and attenuation areas to treat and store rainwater runoff during storm events within development parcels and form a resilient landscape fabric to the Site.
 - Biodiversity - The appeal site lies within the 8km Zone of Influence of the North Meadow and Clattinger Farm SAC. There will be a need for the competent authority to undertake an Appropriate Assessment but there is a Mitigation Strategy in place which represents a costed strategic approach for mitigating recreational impacts. The site is situated approximately 63m from Haydon Meadow SSSI, which is designated for its botanical diversity where it resembles that of an unimproved lowland neutral grassland and is managed as a hay meadow. A total of four Local Wildlife Sites (LWS) lie adjacent to the site itself, with one LWS situated within the site boundary in the south of the site - Bremhill Meadow LWS. This has already been factored into the preliminary masterplanning process for the proposed new community and its developable area.
 - Historic Environment - The site itself is not covered by any historic designations, although there are some Listed Buildings within close proximity to the site, including Pry Farm. Impacts can be mitigated with appropriate design, including development buffers and natural screening, where appropriate.
 - Landscape – The site is not covered by any national or local landscape designations. The site is well contained by existing landscape features, and there is limited visibility into the site from higher ground to the south-west at Purton, despite its elevated position in relation to The Pry which is low lying in the landscape.

- PROW - A number of public rights of way (PRoW) cross the site which would be maintained as part of the proposal.
- Utilities – a number of utilities are situated within and around the site, including gas and oil pipelines which cross the site. Buffer zones and easements have been designed into the proposal.

Masterplan

2.13 The vision for the site is to create a new type of zero carbon community set within extensive nature-rich green spaces in north-west Swindon. A Vision Document has been prepared which considers the constraints and opportunities of the Site and sets out the broad proposals. At this stage, it is envisaged that the development would comprise the following:

- Approximately 1,700 high quality new homes with a range of house types, tenures and including affordable provision, elderly housing, and self-build/custom-build plots.
- A mixed-use local centre comprising employment uses, community facilities, shops, cafes, and other local services such as dentist practices, pharmacy and a GP surgery;
- A mobility hub within the mixed-use centre providing a wide range of sustainable transport choices;
- An extension to Moulton Hill Country Park which will be managed to maximise biodiversity, including new woodlands, riverside parklands with wet meadows, wildflower meadows, wetland habitats and natural ponds;
- Community green spaces and recreational opportunities are extensive and include a range of different sports pitches and courts, a community pavilion, bike and skate park, destination play space, natural play facilities scattered throughout a 'playable landscape', outdoor gym, woodland labyrinth, bird watching tower, orchards and allotments; and
- A network of active travel routes and leisure trails permeates the entire development - forming the principle movement structure - and connecting to Swindon and the wider countryside.

Deliverability

2.14 The National Planning Policy Framework identifies that *'to be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years'*. It also notes that *'to be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.'*

2.15 In respect of its suitability, the above demonstrates that the Site is suitably and sustainably located for the development of a new zero carbon community. Initial masterplanning has been undertaken

and the site represents a logical location to accommodate growth in Swindon. There are no insurmountable technical, physical or environmental constraints which cannot be addressed via the masterplanning process.

- 2.16 In terms of its availability, the whole Site is under the control of Mac Mic Strategic Land who is a strategic land promotion and development company. There are therefore no legal or ownership problems that would preclude the delivery of development at the Site. Furthermore, there are no physical or environmental constraints that would delay or preclude the development of the site.
- 2.17 In terms of the achievability, the Site represents a greenfield site with no issues of viability that might otherwise exist with the demolition and clean-up of previously developed land. Mac Mic Strategic Land has committed significant resources to the promotion of the Site, as well as technical studies, and there are no legal, technical or planning constraints which would otherwise affect development viability. Furthermore, the Site is clearly in a location that developers find attractive to bring forward housing sites for development, this is evident from recent developments in the surrounding area including Tadpole Garden Village and Ridgeway Farm. As such, the Site represents a viable development option with a realistic prospect that new homes could be delivered quickly.
- 2.18 It is noted that the Strategic Housing and Economic Land Availability Assessment (SHELAA) 2025 does not consider the Site as it falls outside of Swindon Borough Council's boundary. It is recommended that the methodology does allow for the consideration of such sites, which represent appropriate and suitable options for future development, acknowledging that collaboration with Wiltshire Council will be required, which Mac Mic Strategic Land is willing to help facilitate. Mac Mic Strategic Land have attended a number of meetings with senior politicians at both Swindon Borough Council and Wiltshire Council; including, for example, meetings with the (former) Cabinet Member for Planning at Swindon Borough Council, Wiltshire's (former) Cabinet Member for Strategic Planning, and more recently with the Leader of Wiltshire Council (Councillor Thorn). Whilst Wiltshire Council are focused on trying to push through their draft Local Plan, it was agreed that communication should continue in the event that their draft Plan is not found sound, or that an immediate review of the Local Plan is likely to be required in the event that the draft Local Plan is found sound.

3. SWINDON LOCAL PLAN 2023-2043 – BACKGROUND

- 3.1 The Regulation 18 Consultation sets out a number of objectives, a proposed spatial vision, a series of strategic area and thematic policies and a suite of development management policies. The Plan proposes 8 strategic area policies where growth is expected to be focused.
- 3.2 This section provides background to the proposed strategy, before the following section provides commentary and recommendations.

Approach to Housing Growth

- 3.3 Policy SS1: sets out Swindon's spatial approach to growth and identifies that the main focus for housing, commercial and industrial growth for Swindon, including most of its supporting infrastructure, services and facilities, 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.
- 3.4 It goes on to identify that 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.
- 3.5 In respect of the above allocations, policies SGL01 – SGL06 set out the aspirations for the strategic growth areas, and identifies the following deliverability aspirations for each of the sites.
- SGL 01 – Swindon Central Area – designated as a 'strategic growth location' with the ambition to deliver up to 8,000 new homes and 6,000 new jobs, alongside a regenerated and vibrant main town centre environment, new leisure facilities and new social and cultural infrastructure. It notes that the Plan currently allocates sites for 4,347 homes in this area.

- Policy SGL 02 – New Eastern Villages (NEV) - The NEV area includes Redlands, Lotmead, Foxbridge, Great Stall, Rowborough and expansion at South Marston and is proposed to bring forward up to 10,000 homes over the Plan period.
- Policy SGL 03 – Kingsdown - 1,847 new homes are anticipated to come forward here over the Plan period.
- Policy SGL 04 – Wichelstowe – this area is proposed to bring forward at least a further 1,600 homes over the Plan period.
- Policy SGL 05 – expected to bring forward 1031 homes over the Plan Period.
- Policy SGL 06 – North Tadpole - proposed to bring forward 513 new homes over the Plan Period.

3.6 UGA01 (Marlowe Avenue) and UGA02 (Pipers Way) are Urban Regeneration Areas, expected to bring forward 976 dwellings and 844 dwellings respectively.

3.7 The breakdown of sites which make up the above allocations are identified at Appendix 1 of the Regulation 18 Consultation document. Further commentary on the proposed allocations will be provided in the following section.

3.8 Policy SP2: Homes for the Community identifies that 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.

3.9 The supporting text identifies that to meet the 24,100 homes needed, the Local Plan takes into account completions and commitments, leaving a need of 10,502 new permissions over the plan period. The Plan intends to meet the needs through:

- Rolling over strategic site parcels without planning permission from the 2026 Local Plan (totalling 3,498 homes)
- Allocating new sites, with a total current indicative housing yield of around 8,344 new homes.

Sustainability Appraisal

3.10 An Interim Sustainability Appraisal (SA) Report June 2025 forms part of the evidence base to the Regulation 18 Consultation.

3.11 The SA identifies that when exploring growth options/scenarios, *‘the western edge of the urban area is mostly defined by the boundary with Wiltshire and, whilst due consideration must be given to possible cross-border growth, in practice: A) the Wiltshire Local Plan is at a very advanced stage (Examination in Public) which creates a practical challenge; and B) this is a relatively poorly*

performing direction for strategic growth including because of issues around transport connectivity, capacity at M4 J16, settlement gaps and the River Ray corridor.'

3.12 The SA recognises that the Council aims to meet the housing requirement set by the standard method, which is recognised as being challenging but achievable, *'assuming a carefully selected strategy and associated suite of site allocations'*.

3.13 In respect as to whether there is an argument for setting the housing requirement above the local housing need. SA considers the neighbouring authorities in turn, and in respect of Wiltshire recognises at 5.2.9 that it:

...clearly relates very closely to Swindon and, indeed, it can be argued that the Swindon housing market area stretches a considerable way into Wiltshire, plus the M4 functional economic area clearly links the two authorities. The Wiltshire Local Plan was submitted in 2024 under 'transitional arrangements' meaning that its starting point is an understanding of LHN on the basis of the 2023 standard method, which is 1,917 dpa, as opposed to the 2024 standard method which provides a figure of 3,525 dpa. The submitted plan proposes to set the housing requirement at LHN over the plan period as a whole, but with a stepped requirement, whereby the requirement is set below LHN in the early years of the plan and then above LHN in later years (shown here). This is despite delivery over the past three years averaging 2,018 dpa. A clear issue is the lack of identified supply to deliver on this higher housing requirement over the latter part of the plan period and, furthermore, the Inspector wrote to the Council in April 2025 suggesting the need to extend the plan period (to ensure a plan period extending 15 years from the point of plan adoption (also, the Inspector raised certain concerns with the identified supply). Overall, providing for ~2,000 dpa appears to be challenging, let alone ~3,500 dpa, and the Council will be required to prepare a new plan to provide for this higher figure (if at all possible) if and when the plan currently being examined is adopted (NPPF para 236)...

3.14 Paragraph 5.2.7 highlights that in summary, *'attention focuses on growth scenarios involving setting the housing requirement at LHN (with a supply sufficient to provide for this year-on-year, which necessitates a 'supply buffer' as a contingency for delivery issues). However, given the potential risk of unmet needs (in particular) there is also a need to remain open to higher growth (N.B. this is not the same as saying that there are unmet needs).'*

3.15 In terms of the broad spatial strategy, comments are provided on the 'new strategic direction' which involves a major focus on maximising supply from the urban area in order to deliver on a vision for the town centre and key radial corridors through the wider urban area. Whilst the SA supports the direction, it does state at 5.2.45 that *'it is important to question the level of supply that is assumed on the basis of the urban focused strategy, particularly in terms of supply over the crucially important early years of the plan period (the plan must be able to demonstrate a five year housing land supply at the point of plan adoption and then be able to maintain this over the early years of the plan ahead*

of a local plan review, which can then boost supply) but also over the plan period as a whole. Predicting urban supply is far from an exact science, and so there is a need to make suitably cautious/conservative assumptions, with a view to avoiding a situation whereby unforeseen delivery issues lead to a situation whereby the Borough cannot deliver on its committed housing requirement.'

3.16 In terms of brownfield development and maximising urban supply, the SA highlights that 5.2.39 that this needs to be balanced against key planning considerations around:

- Delivery risk - recognising that urban sites are very often complex or otherwise challenging to deliver, including because of existing uses and multiple landownerships, such that they are at risk of major delays and, in turn, impacts to the Borough's ability to deliver on its committed housing requirement.
- Development viability - recognising that even where landowners are confident enough to bring forward a planning application, development viability often limits the potential to deliver / contribute to infrastructure, deliver affordable housing and deliver on wider policy objectives including built environment decarbonisation

3.17 The SA assesses site options at Sections 5.3 and 5.4, providing commentary on strategic allocations and other specific sites. Reference is included in the following section where relevant.

3.18 In terms of the strategy, and particularly growth to the west of Swindon, Paragraph 5.4.45 identifies that there are *'ample supply options associated with preferable options of growth'*, whilst also recognising at 5.4.47 *'there is a need for ongoing discussion with Wiltshire Council regarding long-term growth strategy'*.

Other Relevant Evidence

3.19 When providing detailed comments in the following section, reference will be made to 02.03 Viability report and 03.03 Strategic Housing and Economic Land Availability Assessment 2025

4. SWINDON LOCAL PLAN 2023-2043 – COMMENTARY

4.1 This section provides commentary on the Regulation 18 Consultation, in respect of the following:

- Relationship with Wiltshire Council, in terms of future growth.
- The general approach to development in terms of the overarching strategy.
- The delivery assumptions of the strategic areas, which are being relied upon to deliver housing growth in the area.

Relationship with Wiltshire Council

4.2 In terms of the general approach to development, the SA provides commentary on growth to the west of the City. As identified above, it identifies that whilst *'due consideration must be given to possible cross-border growth'*, it notes that the Wiltshire Local Plan is at a very advanced stage which creates a practical challenge. It also considers that this *'is a relatively poorly performing direction for strategic growth including because of issues around transport connectivity, capacity at M4 J16, settlement gaps and the River Ray corridor.'*

4.3 In respect of the first issue, there is the recognition at 5.2.9 of the SA that whilst Wiltshire Local Plan has been submitted for examination, its housing requirement is based on the 2023 Standard Method, rather than the 2024 Standard Method, which increases the annual requirement by 1,608 dwellings. The SA identifies that *'providing for ~2,000 dpa appears to be challenging, let alone ~3,500 dpa, and the Council will be required to prepare a new plan to provide for this higher figure (if at all possible) if and when the plan currently being examined is adopted'*. There will also be a requirement for an immediate review of the Wiltshire Local Plan within 18 months, in accordance with NPPF Para X. It is considered that the Site would represent a suitable option for housing growth which would assist in meeting Wiltshire's housing requirement, now or in the future. As set out above, it is a deliverable housing site with limited constraints which could be built quickly.

4.4 It is considered that Swindon has a role to play in supporting growth in this manner. The SA discounts areas west of Swindon, identifying that it is a poorly performing direction for strategic growth. This is strongly contested, and the analysis of the Site in section 2 illustrates that development at Land at Pry Farm would be a sustainable and suitable option for development in this direction. In particular, our proposals include a mobility hub and enhanced bus services, as well as enhancement of existing pedestrian connections, which would minimise in and out-commuting, and lead to the creation of a highly sustainable community. In this context, development west of Swindon should not be ruled out as a sustainable option and it is recommended that sufficient flexibility is drawn into the Plan to allow for ongoing discussions with Wiltshire Council. The Swindon Local Plan will cover the period to 2043 and it is essential that cross-border discussions can be had over the lifetime of the Plan, and indeed, this is recommended by the SA which states that *'there is a need for ongoing discussion with Wiltshire Council regarding long-term growth strategy'*.

Overarching Strategy

- 4.5 The Local Plan Strategy seeks to be urban focussed, relying on a series of brownfield sites as well as strategic allocations, many of which continue to be allocated from the adopted Local Plan and rely on significant infrastructure. Questions are raised regarding the viability and deliverability of these sites, and it is considered that sufficient flexibility should be provided in the plan to provide alternative sites, should they not deliver at the rate anticipated.
- 4.6 In this regard, it is considered that the Regulation 18 Consultation is significantly overambitious in terms of the capacity of these sites, as well as the assumptions of delivery. The SA raises caution, highlighting that it is important to reiterate that the Local Plan must commit to a housing requirement that is deliverable, avoiding a repeat of the issues experienced following the adopted Local Plan. In commenting on supply, the SA recognises at 5.2.45 that predicting supply is far from an exact science, but *'there is a need to make suitably cautious/conservative assumptions, with a view to avoiding a situation whereby unforeseen delivery issues lead to a situation whereby the Borough cannot deliver on its committed housing requirement.'* As identified below, the Council has not been cautious or conservative in its estimation of the delivery rates of these sites, and further sites should be identified in order to give greater certainty moving forwards.

The Delivery Assumptions of the Strategic Areas

- 4.7 This section provides commentary on the proposed site allocations within the Regulation 18 consultation.

Swindon Central Area

- 4.8 As identified in the previous section, the ambition for Swindon's Central Area is to deliver up to 8,000 new homes. However, the plan only identifies sites for 4,347 dwellings. It is not clear where the additional 3,653 dwellings are to be allocated and therefore this overall aspiration should be treated with caution. Whilst the SA does appear to accept the 4,317 dwellings as a suitable minimum figure with a sufficient degree of confidence, it does note that *'it is important to be clear that even delivering new homes in the Central Area at this rate would represent a step-change.'*
- 4.9 The sites which make up the 4,347 dwellings are set out at Appendix 1. Despite the point made in the SA, it is considered that many of these sites are unlikely to deliver the number of dwellings suggested.
- 4.10 As a general point, the deliverability of urban brownfield sites is often challenging. The SA identifies that urban sites are very often complex or otherwise challenging to deliver, including because of existing uses and multiple landownerships, such that they are at risk of major delays and, in turn, impacts to the Borough's ability to deliver on its committed housing requirement (recalling that under-delivery leads to punitive measures, as has been the experience of the Borough for many years). Furthermore, development viability is a key concern. This is reinforced by the Local Plan

Viability Assessment which notes the following in terms of sites such as those proposed in the central area:

- 4.4 – The market is perceived to be strong, and it is a desirable place to develop housing. Having said this, *‘there is no doubt that some areas, particularly the central area, remain challenging due to lower values’*
- 10.19 – *‘the higher density flatted development, modelled as 6 storeys or more, in the central area, is unlikely to be viable, even without affordable housing. This is a factor of the greater build costs applied to tall buildings (based on the BCIA data), and the relatively modest values for flatted development in central Swindon.’*
- 10.47/12.100 – *‘if the Council were to follow this advice, it would be necessary to be cautious in relying on brownfield sites in the five year land supply and overall housing trajectory, as the delivery of these is likely to be continue to be challenging. It will be necessary to have regard to the progress of brownfield sites through the development management process and/or commitments from site promoters. This may influence the selection of sites for allocation.’*
- 12.98 – *‘the property market across Swindon is mixed. Some areas are stronger than others. Most types of residential and non-residential development is coming forward, however, development of brownfield sites, particularly in the centre of Swindon, are challenging.’*

- 4.11 In line with the above, over-reliance on these sites to deliver housing in the plan period should be resisted.
- 4.12 In terms of specific sites identified at Appendix 1, there is concern that the figures as suggested are overly ambitious. A few examples are highlighted below.
- 4.13 Site Allocation 18-001 – North Star - has been the subject of recent planning applications. An application for planning permission and Listed Building Consent was submitted at the Oasis Leisure Centre site for the re-ordering, demolition in part and construction of new building elements of the Oasis Leisure Centre including the associated site clearance, engineering works (S/24/1431/TB and S/LBC/25/0182/TB). This has a resolution to grant planning permission (8th July 2025 planning committee). To the north of the Leisure Centre, there is also a resolution to grant planning permission for employment units (Use Class B8 (including Data Centres), B2 and or E (g) (iii)), along with all associated engineering and site clearance (S/OUT/24/1427). To the south of the Leisure Centre, an application was submitted for the development of 707 no. apartments to include car parking, associated public and residential amenity space, cycle parking facilities and outdoor play facilities, along with associated engineering and site clearance (S/OUT/24/1426). Whilst this application was recommended for approval, it was refused planning permission on 24th July 2025. The reasons for refusal related to the lack of affordable housing, education contributions and failure

to safeguard the protected route of Wilts and Berks Canal. It was also considered that the proposal would cause substantial harm to the Grade II Listed Oasis, and overall would not be sustainable development as it would fail to improve social and environmental conditions, or promote health and wellbeing for those people living and working in Swindon Borough.

- 4.14 The application was for 707 dwellings and therefore the 743 dwellings suggested in the Regulation 18 consultation would be unrealistic. Given the recent refusal, the development may result in being redesigned to overcome some of the reasons for refusal, which would likely reduce this further. Irrespective of this, given that residential use is only proposed on a proportion of this allocation in line with the above planning applications, it is considered that the maximum yield for this site would be 707 dwellings.
- 4.15 Site Allocation 18-002 – Land to the north of the Station - is made up of North Star House, and Polaris House. North Star House is a former office building which has recently been converted into flats¹ (S/PO2R/21/0651 and S/PAOTH/23/0934 for 298 dwellings in total). Polaris House is the Headquarters for UKRI, a significant local employer.
- 4.16 In respect of the development of the site, the Sustainability Appraisal notes the following at Paragraph 5.4.12:
- ‘However, it is important to highlight Polaris House, within Land north of the Station, which was identified through the Urban Capacity Study rather on be the basis of a submission received from the landowner. This is an important office campus discussed within the ELR as home to “science and innovation head offices” that is “in good condition with no obvious vacancies” and which is also highlighted within the Heart of Swindon Vision, which highlights the importance of a number of the knowledge sector businesses/organisations within Polaris House to the town centre. On the other hand, the proposed housing supply trajectory is clear that any redevelopment would occur later in the plan period, such that there would be ample opportunity for relocation.’*
- 4.17 It is clear from the above that there would be a need for UKRI to be relocated from Polaris House to deliver further housing on the site. In this regard, an article from earlier this year confirms that UKRI commits to staying at the Polaris House base². As such, there is no certainty on the availability of this part of the site for housing. Furthermore, the western parcel is already in residential use (consisting of 298 flats) and therefore is unlikely to be redeveloped further. In this context, alongside caution over the availability of the site, it is not considered that site would be able to deliver the proposed 1,358 dwellings, given that development is limited to the eastern end.
- 4.18 18-006 - Brunel Quarter - is a complex site, and is made up of the Brunel Shopping Centre and surrounding land. The shopping centre contains a number of vacant units but a number of these are

¹ <https://northstarhouseswindon.co.uk/>

² <https://www.swindonadvertiser.co.uk/news/25077998.united-kingdom-research-innovation-stay-based-swindon/>

still in use. The 2025 SHELAA identifies that there is potential to provide a significant residential-led mixed use scheme with town centre uses retained along key streets only. This is one of the key aspirations within the Heart of Swindon Vision Document.

- 4.19 A hybrid planning application on part of this site was submitted in 2019 for the demolition of 44-54 Canal Walk (Brunel Shopping Centre) and the construction of two multi-storey towers for mixed use (up to 290no. residential units) and a podium 1-3 storeys (Use Class A1-A5 and leisure uses) with associated access (access and scale not reserved), as well as the reconfiguration of the trucking deck. This comprised of 2 residential blocks of 20 and 24 storeys respectively. This was submitted in 2019 and has not yet been determined.
- 4.20 Overall, whilst the aspirations for the redevelopment of the Brunel Quarter forms part of the overall vision for the area, caution is raised regarding the deliverability of the site within the plan period, and particularly, the number of dwellings that could reasonably be expected. In this sense, 1,016 dwellings is considered to be overly optimistic.
- 4.21 In the context of the above, significant concern is raised in the reliance of brownfield sites within the Swindon Central Area to deliver a large proportion of the housing requirement within the Local Plan. This is one of the key issues raised within the Viability Assessment, which recommends that brownfield sites should be treated with caution. The Local Plan identifies that there are allocations to deliver 4,347 dwellings in this area; this figure is considered to be overly optimistic, particularly in relation to the sites raised above where the deliverability is questioned. However, despite the allocation of 4,347 dwellings, the Local Plan seeks to deliver up to 8,000 homes in this area. It is considered that there is limited evidence to demonstrate that 4,347 dwellings is deliverable, let alone a higher figure of 8,000. It is recommended that this is reviewed by the Council, and consideration given to the allocation of additional deliverable sites to meet its housing requirement.

Other Site Allocations

- 4.22 A number of the other site allocations within the Local Plan Regulation 18 Consultation are large greenfield sites, many of which have been retained from the existing Local Plan. These sites are large strategic sites which tend to be reliant on the delivery of infrastructure. These sites can often be slow to deliver and therefore caution should be raised regarding the overreliance on such sites.
- 4.23 In terms of SGL-02 New Eastern Villages (NEV), Appendix 1 set out the land parcels proposed, which consists of land rolled over from the Local Plan 2026, pipeline commitments and new site allocations.
- 4.24 The adopted Local Plan allocates this site for 8,000 dwellings, whereas the Regulation 18 Consultation allocates 10,000 dwellings on the Site. However, the sites set out at Appendix 1 total 9,389 rather than 10,000 homes, and therefore it is not clear how the 10,000 dwellings will be delivered. It is also worth noting that some of the additional sites identified are identified within the SHELAA as currently in industrial use, so it is not evident that they are available for development.

4.25 In respect of NEV, the SA states:

2.3.6 - New Eastern Villages (NEV), which was allocated in the adopted Local Plan to deliver 8,000 homes by 2026 but which has faced major delivery challenges, and to date has delivered just a small handful of new homes, although a new strategic link road is nearing completion.

5.3.10 - New Eastern Villages (NEV) – whilst the adopted Local Plan envisaged 8,000 homes in total, all to be delivered in the plan period which ends in 2026, the new proposal is to support 10,000 homes in total including 8,000 in the plan period, i.e. by 2043. The proposal to support additional homes is the outcome of much detailed work over many years and aims to be boost viability and ultimately support delivery the established vision, recognising that this is a very complicated site given flood risk zones as a constraint to masterplanning, plus a need for equalisation across numerous landowners. There is no potential to call this approach into question, i.e. suggest revisiting the NEV vision (subject to consultation). However, it is important to state that delivery of 8,000 homes in the plan period is associated with a degree of uncertainty.

5.4.40. ... There is a clear need to acknowledge ongoing delivery risk in respect of NEV, but detailed work is ongoing to firm-up understanding in respect of the delivery trajectory and associated risks.

4.26 The SA considers the delivery of 8,000 dwellings within the plan period (10,000 dwellings overall); however, Policy SGL-02 refers to 10,000 dwellings being delivered in the plan period. In light of the concerns highlighted within the SA, it is considered that 10,000 dwellings would not be achievable, and caution should be raised as to the delivery of 8,000 dwellings.

4.27 SGL-04 Wichelstowe is an allocated site within the adopted Local Plan which is partly built out, and the remaining currently being delivered. The Regulation 18 Consultation suggests that at least a further 1,600 homes will be delivered in the plan period. Appendix 1 does not define these sites but suggests that the allocation has been rolled over from the adopted Local Plan. The SA suggests that *'the current proposal is to deliver a further 1,620 homes in the plan period and this reflects a view that land proposed for employment land in the adopted Local Plan can is now better brought forward as residential.'* The Local Plan does not define the area of land where employment land will be substituted, and therefore it is not clear if the intention is to replace all of the employment land. Nevertheless, to deliver 1,600 dwellings a significant proportion will be lost. Some concern is raised with this given that the intention for Wichelstowe was for a mixed-use development, and limited justification has been given for the re-allocation of this land for housing.

4.28 Appendix 1 identifies a number of new sites within existing allocations (e.g. SGL-03 Kingsdown) as well as new allocations at SGL-05 East Wroughton and SGL-06 North Tadpole. Whilst these sites have not been scrutinised in detail, it is clear from the 2025 SHELAA that a number of these sites

which make up the allocated sites have been identified as red landscape impact within the assessment, with 'significant landscape concerns' identified. A red landscape RAG rating is defined within the methodology as '*development likely to cause a considerable impact to landscape character, food production or open space and mitigation measures unlikely to minimise impact to an acceptable extent.*' In this regard, the inclusion of the sites within the proposed allocations is questioned. Even if included, this constraint may have implications on the numbers of dwellings which can be achieved on the sites.

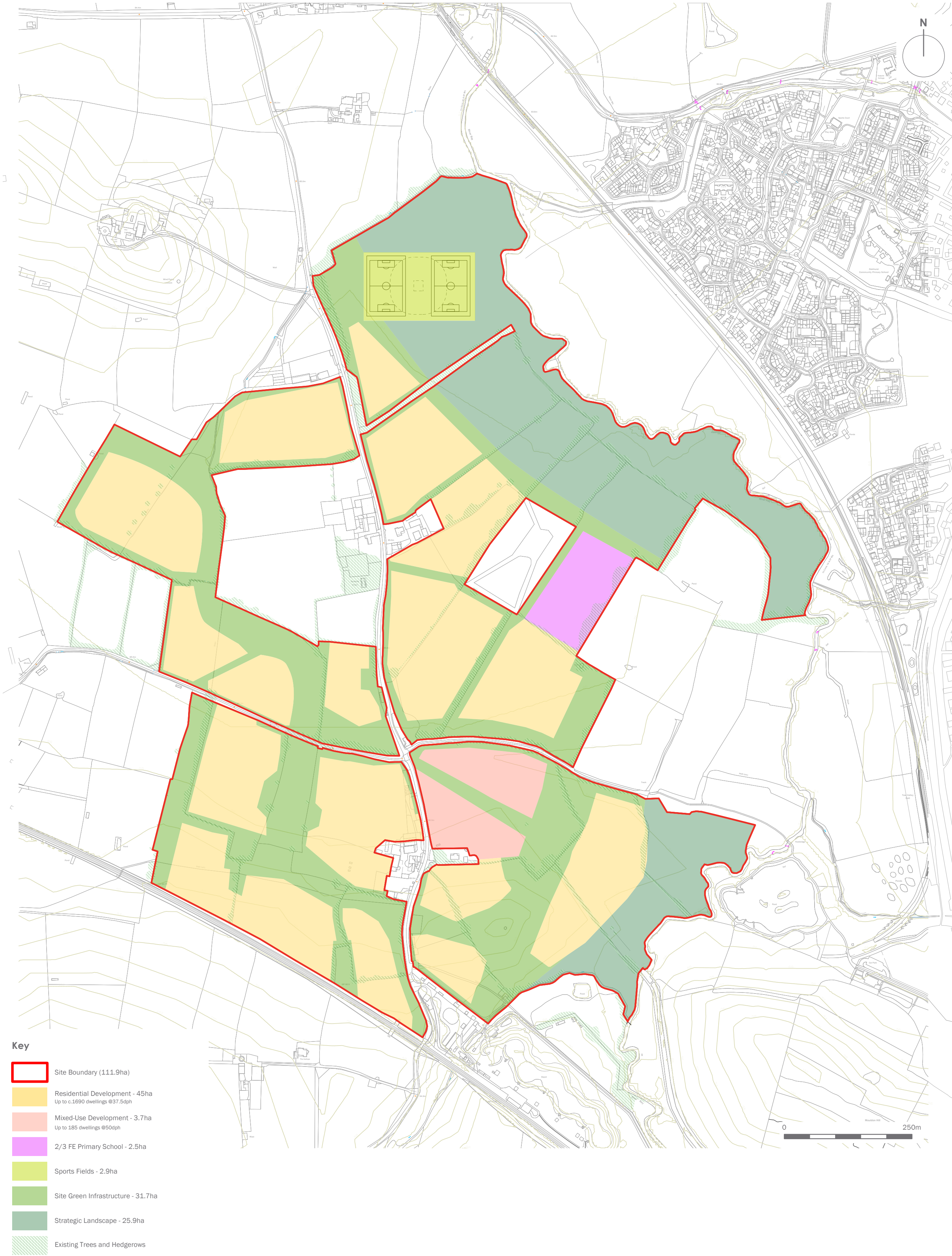
- 4.29 In this regard, the overall capacity and delivery rates identified in the Regulation 18 Consultation is also considered to be overly optimistic and should be reviewed.

Recommendations

- 4.30 As set out within this section, concern is raised in relation to the delivery rates and numbers of dwellings identified within the Regulation 19 Local Plan in respect of the proposed allocated sites. Swindon Borough Council aims to meet the housing requirement set by the standard method (1,205 homes per year, which equates to 24,100 new homes over the 20-year Plan period to 2043). The SA identifies that this is challenging but achievable '*assuming a carefully selected strategy and associated suite of site allocations*'. As set out within this section, it is not considered that the allocations will meet this ambition and therefore the housing requirement will not be deliverable. In the context of the above, and in order to meet the Council's housing requirement, there is a need to identify additional deliverable sites.
- 4.31 It has been identified that Wiltshire's housing target is due to increase considerably on adoption of its Local Plan. It is considered that the Site would represent a suitable option for housing growth which would assist in meeting Wiltshire's housing requirement, now or in the future. Indeed, it's worth noting that the former Regional Spatial Strategy had identified the site and surrounding area as a '*broad area for growth*', thus demonstrating its suitability. In this context, development west of Swindon should not be ruled out as a sustainable option and it is recommended that sufficient flexibility is drawn into the Local Plan to allow for ongoing discussions with Wiltshire Council regarding the deliverability of other suitable sites. The Swindon Local Plan will cover the period to 2043, and it is essential that cross-border discussions can be had over the lifetime of the Plan.
- 4.32 This representation demonstrates that that development at Land at Pry Farm would be a sustainable and suitable option for development, which can be delivered quickly without significant infrastructure requirements. As drafted, the strategy does not allow for sites such as this to come forward, or cross-border discussions to be had with Wiltshire Council to meet ongoing needs. It is recommended that this is added to the Local Plan to ensure both Swindon and Wiltshire's ongoing needs can be met.

5. CONCLUSION

- 5.1 This response has been prepared by Ridge and Partners LLP on behalf of Mac Mic Group to the Swindon Local Plan 2023–2043 Regulation 18 consultation. Mic Mac Strategic Land are promoting Land at Pry Farm, Swindon ('the Site'). Whilst the land falls within the administrative boundary of Wiltshire Council, it is located to the immediate west of Swindon Urban Area.
- 5.2 It has been identified that Wiltshire's housing target is due to increase considerably on adoption of its Local Plan. It is considered that the Site would represent a suitable option for housing growth which would assist in meeting Wiltshire's housing requirement, now or in the future. In this context, development west of Swindon should not be ruled out as a sustainable option and it is recommended that sufficient flexibility is drawn into the Local Plan to allow for ongoing discussions with Wiltshire Council. The Swindon Local Plan will cover the period to 2043 and it is essential that cross-border discussions can be had over the lifetime of the Plan.
- 5.3 The Local Plan Strategy seeks to be urban focussed, relying on a series of brownfield sites as well as strategic allocations, many of which continue to be allocated from the adopted Local Plan and rely on significant infrastructure. Questions are raised regarding the viability and deliverability of these sites and sufficient flexibility should be provided in the plan to provide alternative sites, should they not deliver at the rate anticipated. The Sustainability Appraisal highlights that it is that the Local Plan commits to a housing requirement that is deliverable, avoiding a repeat of the issues experienced following the adopted Local Plan.
- 5.4 The Swindon Central Area is proposed to deliver 8,000 dwellings but the sites identified in Appendix 1 only identify sufficient sites to deliver 4,347 dwellings. It is not clear how the remaining dwellings are to be delivered. An assessment of the sites identified in Appendix 1 has been undertaken and concern has been raised with the delivery rates associated with a number of these sites. The Viability Assessment raises caution with including *brownfield sites in the five year land supply and overall housing trajectory, as the delivery of these is likely to be continue to be challenging*. In this regard, concern is raised regarding the approach being taken within the Swindon Central Area, and particularly the delivery rates, which are considered to be overly optimistic.
- 5.5 The Regulation 18 consultation also includes a number of greenfield strategic sites, many of which have been retained from the existing Local Plan. These sites are large strategic sites which tend to be reliant on the delivery of infrastructure. Concerns have also been raised regarding the delivery rates of some of these allocations.
- 5.6 In the context of the above, it is considered that in order to meet the Council's housing requirement, there is a need to identify additional deliverable sites. Land at Pry Farm, as explained in Section 2, would be a deliverable site in this regard.





Respondent No: 333

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Gayle

Q3. Last Name Cook

Q4. Job Title (where relevant) Ward Councillor for Wroughton and Wichelstowe

Q5. Organisation (where relevant) not answered

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

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

The Local Plan for Wroughton and Wichelstowe. Wroughton is a village and is in the East Wiltshire a rural constituency and wants to remain so. This village has a thriving community and wishes to remain like that and not to be swallowed up by Swindon. In the local plan it has been decided that Wroughton should have about 1043 new homes . Which is 1/8 of the housing required in the Swindon local plan. I think that the parish have taken their fair share of housing for example Middle and West Wichel are still having homes being built , which is part of our parish. Why not use the obsolete park and ride at Wroughton and the Burmah site off Pipers Way or other industrial sites that have laid vacant for years. Like the Greenbridge site and the site next to the Ford garage off Doran Way? My concerns are that there is not enough educational provision provided in the local plan for Wroughton. There is a waiting list at both the Ridgeway School and the Junior School. The traffic around the schools causes a lot of problems with parking and buses not having easy access .It has got worse since September as The Ridgeway School has the same hours as the Junior School. The doctors surgery in Wroughton is already over subscribed with patients who find it difficult to get an appointments. This is mainly caused by the influx of new patients from Middle and West Wichel who still are waiting for their surgery to be built. Yet again no accommodation for a surgery in this local plan. There is no direct bus service to the Great Western Hospital from Wroughton. With the increase in housing that is proposes GWH needs to be expanded for the growing population. Wroughton has some very narrow roads for example Brimble Hill and Marlborough Rd which is used by HGV's which regularly mount the pavements. The A4361 the Swindon to Devizes road also heavy with traffic. Are there any proposals for a bypass around the village? The broadband system that we have in Wroughton is inadequate ,before you start building any houses will you be upgrading the broadband? How are you going to solve the flooding issues that we already have in Wroughton for example Perrys Lane the culverts there and some antiquated sewer systems .Will we have enough water and sewage systems in place for this extra housing ? Wroughton has no major supermarkets ,the nearest is Waitrose which you need to get there by car and is one of the more expensive supermarkets. Wroughton has a very large number of elderly residents and not everyone drives .So a need for good public transport links is vital for our residents . Let's keep Wroughton a thriving community .

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

not answered



Respondent No: 334

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Carol

Q3. Last Name Clark

Q4. Job Title (where relevant) Assistant Clerk

Q5. Organisation (where relevant) South Swindon Parish Council

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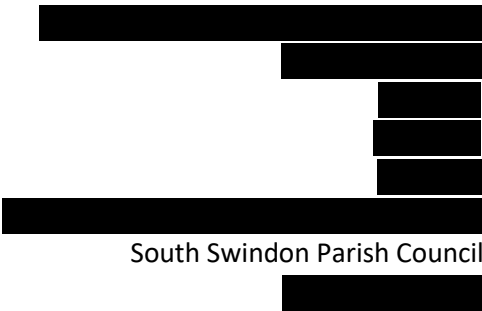
[REDACTED]

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

SBC admin note: Please see attached response.

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

SBC admin note: Please see attached response.



South Swindon Parish Council

13th October 2025

Swindon Local Plan 2043 – Regulation 18 Consultation

To whom it may concern,

Please find below representation from South Swindon Parish Council regarding the Swindon Local Plan 2043, Regulation 18 Consultation:

Central/Eastcott/Old Town

- We refer to our Heart of Swindon response to Central Swindon development (response attached to Parish Council email).
- Cambria Bridge, GWR Park, and Queens Park can all support the Town Centre. However, there will need to be appropriate Town Centre amenities to support the proposed number of new residents living within the Town Centre.
- Cambria Bridge Recreation Area – This is an important strategic play site that supports the Town Centre and ripe for enhancement. The Eastern Flyer and South Swindon Green Trail run through the site and is a gateway into the Town Centre from South and West Swindon.
- Westcott Recreation Field - Strategic Play Site - very accessible site with parking available and a cycleway running through it. There are opportunities to enhance this area particularly with the Newburn Sidings development planned nearby.
- GWR Park - a great park and open space amenities to support Town Centre residents. The Parish Council is looking at enhancing the park with a nature Trail, additional tree planting, the reopening of public toilets and further park amenities. Our aim is to improve biodiversity and increase play and leisure value. We would welcome new Central Swindon development to support these ambitions.

We would also welcome the opportunity to develop the garages that border the park. The garages are an eyesore on the park and new development in keeping with the Railway Village Conservation Area could offer a great opportunity to enhance the park amenity while bringing more development on a brownfield area.

- Queen's Park – the Local Plan and new development could offer the opportunity to enhance existing amenities. Key focusses for new investment would be addressing the lakes in the park (currently full of duckweed and nutrient rich from silt). As an urban park, it could be a good opportunity to enhance Biodiversity in a supporting Town Centre location. Currently

nearest Play Area is Euclid Street Play Area which has limited play value and could be part of the Civic Offices development area. Spring Gardens is an open space that is included within the Heart of Swindon plans and could provide space for an enhanced play space.

- Town Gardens - current focus is on investment into the iconic Bowl structure and open space area. We are aiming to make this a premium outdoor music and cultural performance venue in the town. Investment is required to make this a more useable and safer space for events and new development could offer the opportunity.
- Cambria Bridge, GWR Park, and Queens Park can all support the Town Centre. However, there will need to be appropriate Town Centre amenities to support the proposed number of new residents living within the Town Centre.

Walcot/Parks

- Enhancing Buckhurst Field, transforming the open area to a more park-like amenity - more accessible by foot and bike. More landscaped features - trees, shrubs, etc. Potentially additional sport/recreation amenities.
- Eastern Avenue Open Space - tree planting, sufficient size to have additional sports and recreation amenities.
- Shaftesbury Lake - currently the only wildlife space in the Eldene and Parks communities. We would welcome the opportunity to make this a destination area for those communities.

Potential amenities that could be enhanced to the benefit of residents of new developments through additional investment:

- Marlowe Development Area: We broadly support this scheme to regenerate this area of Walcot.
- Buckhurst Field: The open space will be the key space for residents of new Oakfield, Marlowe Avenue and Greenbridge Road developments. The Parish Council is seeking assurances the field will be protected from development and want to transform the open space into a more park-like amenity, with more accessible footpaths and cycleways linking up to the Town Centre. We would welcome more dialogue with Swindon Borough Council (SBC) planners on how the Local Plan can support these aims.
- Shaftesbury Lake - currently the only wildlife space in the Eldene and Parks communities and runs along the South Swindon Green Trail. We would welcome the opportunity to make this a destination area for those communities, making it more accessible with more amenities - bins, benches, etc.

Old Town/East Wichel/Lawn

- East Wichel Country Park - this already has planning approval but there is a need to ensure there is sufficient funding to make this a success.

- Croft Country Park - the South Swindon Green Trail passes through this area and it is rich in wildlife, however this area is undermaintained, with weeds and other intrusive species taking over. It could be transformed into a destination area.
- Marlborough Park - Central Public Open Space a real opportunity to create a destination area for this area of Swindon, thriving with wildlife and biodiversity.
- Marlborough Park/Pipers Ways Development - We support a strategic masterplan for this site to ensure this a coherent community and would welcome involvement in this. The South Swindon Green Trail runs around the development area and needs protecting and ideally enhanced. We would welcome investment in existing communities neighbouring the site such as Croft Sports Centre and Croft Play Area.
- Great Copse – This ancient woodland is currently sandwiched between Intel and Nationwide. This woodland may become at risk when the Intel site is developed for housing.

Community Facilities

Our specifications and requirements for community centres or library facilities in new developments would be (which we may feasibly end up operating):

- Community Hub approach (Hire, Library, other services, etc).
- Built-in kitchen facilities to enable community café provision (see Beechcroft Library and Pinetrees Community Centre as model)
- Located in village centres/shopping centres and near schools rather than standalone facilities (like Badbury Park, Beechcroft Shops).

Healthy Travel Networks

We have an interest in healthy travel networks (foot and cycle ways), particularly regarding those that we maintain (such as the Green Trail) and where they cross land we have an interest in (the Parks and Buckhurst).

- We wish to see the inclusion of a Cyclepath and/or footpath along Buckhurst Field linking the new development area of Marlowe Avenue with Queen's Drive and more linkage between Park North and Walcot through the field. This has already been scoped by the Borough Council's Highways Department.
- South Swindon Green Trail - is a great trail to link urban and rural South Swindon. We would like future developments to enhance areas along the route.

Flood Mitigation

We wish to see extra Flood mitigation measures, particularly in Town Centre developments and flooding of the River Ray at Westcott.

- Concern over drainage outfall from the River Ray and likely increased volume of water as a result of new development. Newburn Crescent and Birch Street have already flooded.
- Issues with water run-off down to Queen's Park Lake. We would like developments through the Local Plan to provide an opportunity to review the water flow to protect the lakes.

Green Space

We have an interest in green open space, allotments and play provision in new developments, particularly where we are likely to be involved in their management.

- Need for more allotment sites – there are 330 people currently on the South Swindon Parish Council (SSPC) waiting list. SSPC has the experience and infrastructure to expand allotment provision in the parish.
- Town Centre located green space, sport, activities and schools need to be compatible with the number of dwellings in the Town Centre area. Green space, sport, activities and school facilities required for the Town Centre as a result of new development should be located in the Town Centre, not elsewhere. Focused and meaningful greens spaces should be delivered for the benefits of residents in the Town Centre and not a meaningless area equivalent of multiple small “pocket parks” that offer residents limited and inflexible usage.
- A preference for new development to enhance existing amenities near to development with existing organisations responsible for maintenance rather than investment in new, underwhelming amenities as is often the case with “pocket parks”.
- The Parish Council has worked with gardening groups to establish numerous urban community gardening areas. Further investment through the Biodiversity Net Gain (BNG) fund or other developer contributions from nearby development could help further enhance these amenities. Community Garden areas include:
 - The Gap
 - Manor Road Community Garden
 - Cambria Bridge Flower Beds
 - Mill Lane Community Garden
 - Richard Jefferies Museum
 - Hesketh Crescent Flower Beds
 - Angel Ridge Community Garden
 - Fishing For The Moon Garden
 - Central Community Centre Garden

Land or green space that we would want to see protected from development.

- South Swindon Green Trail
- Buckhurst Field
- Community Gardening sites
- Allotments

Indoor & Outdoor Sports Provision

Within South Swindon Parish there are 7 sports hall facilities with at least 1 badminton court (BC):

Site	BC
Croft Sports Centre	5
Lawn Manor Academy	1
Even Swindon School	1
Holy Cross Catholic Primary School	4
New College Swindon	4
St Joseph's Catholic College	4
The Commonweal School	2/1

Only three facilities are able to support larger scale team sports (Croft, St Joseph's & New College). Although Holy Cross School has the space to provide 4 BC, they do not have the line markings in place for sports. Neither do they have basketball hoops or the ceiling height to offer basketball. In this respect the needs assessment produced by Knight, Kavanagh & Page is misleading to the actual capacity of sports hall provision within the parish.

Regarding the three sports halls that do have capacity for a wider range of sports:

- Croft, the consultant's report states that this is the only facility of the three which is available to use during the daytime and offers the highest number of community use hours per week with 88.5 hours. However, the Croft Sports Centre is open from 15.00 - 22.00 during the week and 9.00 – 13.00 on Saturdays which is 39 hours of community use per week not 88.5 hours.

Many people living in South Swindon would like more than a sports hall as a form of physical activity space. Anyone wanting to go to fitness classes would have to travel to the Link Centre for example.

- New College is operating at 80-100% used capacity. They provide 36 hours of community use per week.
- The sports hall at St Joseph's costs £41.00 for an hour and charges an additional 15% to provide insurance for hall hirers. The hall is available to book from 5.00pm – 9.00pm Monday to Thursday, a total of just 16 hours of community use per week, with no access on weekends. No data has been provided for their used capacity.

In reality, within South Swindon, there are a total of 91 community use hours per week within 4 BC sports halls for a population of over 66,000.

When addressing the deficit in community use hours, it is unrealistic to expect schools to open longer to provide increased access for residents to sports halls. How can SBC reasonably influence schools to open their community buildings consistently and for longer?

Furthermore, it is noted within the needs assessment that a sports hall with 8 BC is required to support basketball, netball clubs and their growth. Growing these clubs would positively affect

residents of South Swindon and Swindon as a whole. How does the Borough Council plan to support clubs who make block bookings and provide sessions for large numbers of the community? Additionally, how can Swindon Borough Council support the expansion of these clubs to positively impact more local residents?

How can Swindon Borough Council accurately measure if they are providing sufficient indoor sports facilities when multiple areas in Swindon have been identified by Sports England as areas of having activity inequality and face barriers to engaging in activity. With the Swindon Place Partnership looking to increase activity within 7 areas across Swindon, would SBC be able to provide facilities for an increased number of residents looking to engage with activity?

Across Swindon there have been at least three notable losses in sports hall provision; Link Centre (now trampoline park), Oakfield Campus and the Oasis Leisure Centre. The Oasis Leisure Centre was 8 BC and with the closure of this facility, Swindon now lacks a facility of comparable size. With these losses of available space how can SBC ensure that sports hall provision is suitable for a growing population, especially within urban areas?

Furthermore, the S106/ CIL monies received for the Oakfield development that saw the Oakfield Campus demolished were spent on refurbishing an existing outdoor facility (Buckhurst Playzone for example) rather than providing indoor sports facilities. South Swindon Parish Council support the scenario detailed in the needs assessment which would see two new 4 BC facilities provided at the Oasis and Central Sports Hall (Run 3, New facility in Town Centre). From the needs assessment's projection for 2042, the most unmet demand for BC is within the Town Centre which has 1.4 BC across 9 square kilometres. Southwest of the Town Centre there only exists 0.4 BC per kilometre. New facilities at Oasis and a Central Sports Hall would help to ensure demand is satisfied for 2042 and ensure South Swindon parishioners have access to sports hall facilities.

Padel

With the rising popularity of padel how can the local plan ensure that padel facilities are accessible for all residents? The sites which offer this are Delta Tennis Centre and David Lloyd. There are plans for courts at Greenbridge and Westlea but there are no plans for Padel facilities within South Swindon Parish Council's boundaries. Furthermore, as the needs assessment states: padel is becoming commercially focussed. South Swindon Parish Council supports the recommendation that SBC pursue community use agreements with commercial operators to ensure facilities are accessible to residents

Swimming Pools

From the needs assessment, four of the seven swimming pools assessed are below average quality. How can the local plan address the quality issues of existing swimming pools?

Opening the Health Hydro would mean around 45.3% of Swindon residents would live a 20-minute walk to a 'pay and play' facility (would not require membership). This would benefit South Swindon parishioners.

Sports facilities, particularly where it may impact on our own sports provision

- Focus should be on expanding/enhancing existing or planned facilities - Wichelstowe Sports Hub, Croft Sports Centre, Buckhurst Recreation Area, Cambria Bridge Recreation Area.

Policy References

CS1, 1c - Utilise the latest zero/ carbon technologies, this is quite vague. What happens if the Future Homes Standards doesn't become legislation? How will the local planning authority ensure that the latest zero/ carbon technologies are being proportionately incorporated into developments. And how will statutory consultees be able to verify that proportionate zero/ carbon technologies are being incorporated?

CS1, 3 - All major non-residential developments are expected to achieve BREEAM excellent standards. What does this mean in practice? How can developers prove to planning system that they have achieved excellence standards without going for certification? How will the local planning authority ensure that developments have achieved BREEAM excellent standards. And how will statutory consultees be able to verify developments meet this excellent standard?

CS1, 4 - How is the statutory planning authority able to influence developers to create BREEAM sustainable communities? How can statutory consultees be able to verify what has been considered by developers and understand what has been included and what hasn't been included and why?

D1 - Developer Contributions and Viability – needs to be further reviewed with a possibility to re-calculate. What happens if schools/ health centres are removed at the planning stage and there is no contribution, what happens then?

HL3 - Open Space in New Developments, the borough council is encouraging developers to arrange maintenance via parish councils. South Swindon Parish Council welcome's parish councils being consulted early on regarding the provision of open space in new developments.

HL4 - South Swindon Parish Council would encourage there to be preference included in this policy for enhancing of existing amenities where possible.

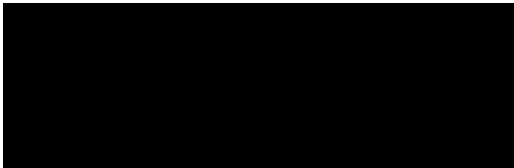
ST5 - How is parking and electric vehicle infrastructure being planned proportionately between existing and new developments?

Final Comments

- SSPC would welcome the opportunity to be involved in developments in the Parish at the earliest stage. Enabling the Parish to be involved in the design stage gives us the best opportunity to appropriately maintain sites. The Oakfield Development has been a great example of development done well, working with the Parish Council at an early stage to ensure maintenance continuity.
- Pocket Parks – No design standard. For pocket parks to be meaningful to support high density living, there needs to be a set of design standards developed in consultation with South Swindon Parish Council.
- Continue to use the most up to date design standards for bin storage and cycle parking. Both should be secure and well-designed into developments at the planning stage.

- It remains South Swindon Parish Council's Policy to object to additional House of Multiple Occupation (HMO) applications within the Central and Eastcott wards as the nominal threshold has been reached and it is deemed that they have a detrimental effect on services, space and quality of life in the area.
- The Local Plan needs to consider the prevention of pavement parking in areas such as Commercial Road.
- In December 2018, Oldlands Walk open green space was removed from the Strategic Housing and Economic Land Availability Assessment (SHELAA). The site was removed from the housing assessment over its importance as an amenity for the local community. Swindon Borough Council agreed to enter into negotiations with South Swindon Parish Council, to take on a 99-year lease on the land. At the time, the Parish Council were considering this open space to be declared a village green. South Swindon Parish Council are keen to continue these discussions with Swindon Borough Council to take on the 99-year lease of the Oldlands Walk open space.
- Refer to our Heart of Swindon Response dated the 20th December 2024.

Yours Faithfully,



Jake Mee FMAAT

Chief Executive Officer

Consultation on Heart of Swindon town centre vision

From Carol Clark [REDACTED]

Date Fri 20/12/2024 13:35

To [REDACTED]

Dear Forward Planning,

The Parish Council welcomes a new masterplan and vision for Swindon's wider Town Centre area, however we do have the following points about the strategy:

- i. As far as we are aware there has been no consideration as to what organisation will be maintaining these newly residential communities. If there is a desire for the parish council to carry out the maintenance services within these new communities, then this needs to be carried out in consultation with the parish, including the opportunity to negotiate service terms and conditions. It is not to be assumed that South Swindon Parish Council will automatically take on any additional services without consultation and negotiation. We believe potential organisations/teams who are maintaining these spaces need to be integral to the design input and would urge Swindon Borough Council to keep this in mind before publishing revised plan.
- ii. Similarly to point 1, we would encourage the Borough Council to consult the Parish Council on the layout, design and functionality of the proposed new community enriching green spaces in the town centre area. Maintenance of these spaces should not be an afterthought.
- iii. We are sceptical whether pocket parks will offer current and future town centre residents the access to natural spaces they are entitled to. For what purpose are the pocket parks and what outcome are they meant to serve for the local residents and visitors to the area?
- iv. Community-building must take place alongside the creation of 5,000 new dwellings in the same way as at developments such as Wichelstowe. We are concerned without the right community facilities, residents living in these properties will be community-less, particularly with the Borough Council's proposal to "switch-off" CIL payments and potentially not expect S.106 payments from developments in these areas. Community building should be made a priority.
- v. There is no mention of new or enhanced healthcare provision to support 5,000 new dwellings.
- vi. With the development of 5,000 new dwellings in the Town Centre area it is important to see good enhancements to existing community amenities in town centre area, like play areas and public parks, which could make the Town Centre more of a destination area for Swindon. The Parish Council would be keen to work with the Borough about how we could invest and make more accessible existing town centre amenities like GWR Park, Queen's Park, Cambria Bridge Recreation Area, the County Ground and Spring Gardens.
- vii. As a consultee for planning applications in the town centre area, the Parish Council has a longstanding commitment to not see further HMOs in the densely populated areas of the town centre area and have been concerned about the standards of properties being developed in the Town Centre area. We think it's crucial a new plan for development in the town centre is accompanied with a commitment to raise the quality of properties being offered in this area.

-
Kind regards,

Carol



Carol Clark

Assistant Clerk

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

www.southswindon-pc.gov.uk



Respondent No: 335

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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

[REDACTED]

[REDACTED]

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[REDACTED]

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

Objections to proposed further development with Wroughton. Already coping with huge impact from Wichelstowe With SBC proposal for 960 houses in our village, it will equate to over 2,000 extra people in our village, which is already bursting at the seams, we do not have the facilities to cope with extra educational places, leisure facilities, health provision, we already have Wichelstowe residents added to the Wroughton surgery and can't get appointments, developers should be made to supply the infrastructure before building all these homes, adding to that the huge impact on our roads, will be disastrous to our community Representation should be made to Government as to the need for all this major over development, with a drop in the birth rate as one of the factors, we need our town rejuvenated with shops and facilities not with further housing PLEASE

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

Revision of plans - Reduction of number of dwellings & infrastructure before housing development



Respondent No: 336

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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

[REDACTED]

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

This further Development in unsuitable & unsustainable - lack of Infrastructure, medical & Educational facilities Village should be retained for natural England heritage which is already under threat with overdevelopment. Wildlife being Driven out of it's natural surroundings - Roads unable to cope with more than 2000 vehicles, plus sewage & water facilities. Please reconsider further Development in Wroughton

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.

Further consultation & re-think on number of dwellings planned, which will impact our village status moving it towards joining with Swindon Town.



Respondent No: 337

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title

not answered

Q2. First Name

Natasha

Q3. Last Name

Styles

Q4. Job Title (where relevant)

Senior Planning Associate

Q5. Organisation (where relevant)

The Planning Bureau Ltd on behalf of Churchill Living and McCarthy Stone

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

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

SBC admin note: Please see attached response.

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

not answered

The Planning Bureau Limited

Bournemouth • Coventry • Hatfield • Manchester • Ringwood • Woking • York

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

Via email: SwindonLocalPlan2043@swindon.gov.uk

10th October 2025

Dear Sir / Madam

CHURCHILL LIVING AND MCCARTY STONE RESPONSE TO THE SWINDON LOCAL PLAN REGULATION 18 CONSULTATION

Churchill Living and McCarthy Stone are separate and competing independent housebuilders specialising in the delivery of housing for older people. Combined, these two companies bring forward in excess of 90% of the provision of housing for older people in England every year and are therefore well placed to provide input to the emerging local plan on matters affecting the delivery of this typology. We encourage the council to introduce supportive and workable policies which facilitate the delivery of this 'critical' housing typology.

Please find below our comments on the draft policies within this consultation insofar as they impact the delivery of specialist accommodation for older persons.

Housing Requirements of Older People – Policy HC4 Specialist Housing

It is noted that the Local Housing Needs Assessment, October 2024, HDH identifies a significant housing requirement for all types of older persons housing over the period to 2043. This is detailed Table 5 of the Local plan draft and Table 7.2 of the LHNA. This identifies a need for over 2,000 specialist houses for older people, made up of 1,600 sheltered housing units (sometimes called housing with support) and over 500 extra care units (sometimes called housing with care). The LHNA identifies in paragraph 7.22 that this represents over 10.4% of the total household growth to 2043. The council's evidence base therefore recognises the need for older person's housing.

The PPG on housing for older and disabled people identifies at Paragraph: 001 Reference ID: 63-001-20190626 that the need to provide housing for older people is critical and that 'an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking'. Paragraph: 006 Reference ID: 63-006-20190626 then confirms that:

'Plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people. These policies can set out how the plan-making authority will consider proposals for the different types of housing that these groups are likely to require. They could also provide indicative figures or a range for the number of units of specialist housing for older people needed across the plan area throughout the plan period.'

The council's evidence base indicates that policies must plan for the delivery of significant numbers of additional older person housing units over the next 20 years.

Whilst policy HC4 provides a framework for how applications for specialist housing will be considered there are several elements of the policy that are not justified or are not prepared positively and are ambiguous especially given the need identified above.

Support for Use Class C2 of the Use class order.

The LHNA and Table 5 of the draft Local Plan details a large need for specialist housing for older people with a greater need for sheltered or retirement living (housing with support) and a lesser need for extra care housing or housing with care. Point 1 makes it clear that policy HC4 refers to specialist housing that falls within the C2 use class, however this is not defined. . Paragraph: 014 Reference ID: 63-014-20190626 identifies that *'It is for a local planning authority to consider into which use class a particular development may fall. When determining whether a development for specialist housing for older people falls within C2 (Residential Institutions) or C3 (Dwellinghouse) of the Use Classes Order, consideration could, for example, be given to the level of care and scale of communal facilities provided'*.

It is well established through good practice that retirement living or sheltered housing usually falls within class C3 use class order, whilst guidance and Appeal precedent identifies that an assessment as to whether extra care housing falls within Class C2 or Class C3 is not a matter of self containment but the level of care that is provided. Extra Care by its very nature comprises self contained accommodation but is most often found to be in use class C2 because of the nature of care provided. (See Housing Lin for further guidance or for example Appeal decision APP/J2210/W/19/3226136 New Road Canterbury).

Although there is this good practice and appeal precedent it is not clear which kind of specialist housing for older people the policy refers to. It would be more evident how a decision maker should react to development proposals if a definition was introduced to the Local Plan that defines which type of specialist housing it refers to in the context of the policy and the definitions of specialist housing for older people detailed within para Paragraph: 010 Reference ID: 63-010-20190626 of the PPG.

The following comments are written on the assumption that all types of specialist housing for older people fall under the remit of this policy, given the need and therefore would be subject to the requirements.

Wheelchair user dwellings

Point b) requires at least 50% of dwellings to be suitable for occupation by wheelchair users, or easily adaptable for residents who are wheelchair users in accordance with the optional Building Regulations M4(3) Category 3: Wheelchair user dwellings or any subsequent update.

The PPG on Housing for older and disabled people considers if plan making bodies should set minimum requirements for accessible housing and at Paragraph: 009 Reference ID: 63-009-20190626 confirms that *'Where an identified need exists, plans are expected to make use of the [optional technical housing standards](#) (footnote 46 of the National Planning Policy Framework) to help bring forward an adequate supply of accessible housing'*. The same paragraph then confirms that ***'Planning policies for accessible housing need to be based on evidence of need, viability and a consideration of site specific factors'*** This is then reconfirmed in Paragraph: 007 Reference ID: 56-007-20150327 of the optional technical housing standards.

Paragraph 002 (Reference ID 56-002-20160519) of the Planning Practice Guidance (PPG) reiterates that local planning authorities have the option to set additional technical requirements for accessibility and adaptability, however, they will need to gather evidence to determine whether there is a need for additional standards in their area, and justify setting appropriate policies in their Local Plans.

The council should also note that it is common for Local Authorities to conflate the needs of 'wheelchair users' with the needs of older people in the community. A supportive local planning policy framework will be crucial in increasing the delivery of specialist older persons' housing and it should be acknowledged that although adaptable and accessible housing can assist it does not remove the need for specific older person's housing. Housing particularly built to M4(3) standard may serve to institutionalise an older person's scheme reducing independence contrary to the ethos of older persons and particularly extra care housing.

Although we note that the housing needs study has looked at the need for M4 (2) and M4(3) accommodation, we also note that this concludes that the majority of need is required in the M4(2) category, with a much smaller requirement within the M4(3) wheelchair adaptable dwellings category. We also note that para 7.51 of the housing needs study concludes that *'It is important to note that the PPG is clear that the suitability of these requirements should be assessed to determine whether they are viable, and also that the authority should not impose any further requirements to the building regulations beyond what is set out in the building regulations for M4(2) and M4(3a) dwellings'*⁷⁶.

We are strongly of the view that the presumption that just because an individual is in specialist older persons accommodation that they will require a wheelchair is an inappropriate generalisation. Churchill Living have been building retirement living apartments since 1994 and have accrued significant expertise in building specialist housing that enables older people to live independently. Recent research into existing Churchill Living developments has resoundingly demonstrated that there is no need for our apartments to meet M4(3) requirements with less than 1% of our occupiers using a wheelchair full time.

People with long term mobility disabilities would be in a different setting and as such would not occupy an independent living retirement development. Given the lack of demand for the requirement for M4(3) in this form of accommodation it would simply be a cost whilst serving no identified need. Indeed, it is likely that those with a longer-term mobility problem already live in adapted accommodation and are resistant to move to older persons accommodation when they are already comfortable with their existing housing with adaptations.

The Council should note that there is an increased emphasis on Local Plan viability testing in Paragraph 59 of the NPPF and that the PPG states that *"The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan"* (Paragraph: 002 Reference ID: 10-002-20190509). M4 2 and 3 Housing has a cost implication and may serve to reduce the number of dwellings and further reduce viability.

The Council have in theory assessed the Viability of the older persons housing typology within their supporting viability study, however it has not been possible to make an assessment of this as the appraisals has not been appended to the study, we have requested to view this but although the council have acknowledge it exists have simply implied that they will consider publishing this at the regulation 19 stage. We have asked for theses and reserve the right to comment further once they have been published / provided.

Para 8.36 of the viability Study indicates that it has tested specialist accommodation at 50% M3(3) using an additional cost of £15,170 per unit. However, it has not been possible to assess whether this has actually been used as the appraisal for the typology as the appraisals have not been published. Given that we have not been able to look at the appraisal we have concern that the viability testing has not been robustly undertaken in relation to this specific policy requirement given the additional cost it creates. The requirement would increase build costs by approximately £900,000. Not only does M4(3) have this additional cost but also requires additional floorspace in order to deliver the standard resulting in larger units than modelled.

We would draw the Council's attention to a recent Churchill living appeal at Penketh in Warrington (Appeal ref 3327682, para 29) whereby it was concluded that it would likely be necessary to increase apartment sizes to meet M4(3) requirements. It follows that a change of unit mix and even site capacity would be required if the M4(3) requirement was applied to 50% of units on an older persons housing scheme. The evidence base does not cater for this likelihood and even without making these adjustments already shows older person housing development to be largely not viable.

It is likely that the testing seeks simply to add a cost to each appraisal but then does not acknowledge the requirement to adjust the unit sizes to cater for M4(3) requirements. Again, this cannot be checked without access to the appraisal.

It is clear that no account has been taken by the council in assessing the physical barriers of delivering M43 standards and in particular the requirement to provide larger units. We are unsure if it has been tested corrected through the viability study as the appraisals for older persons housing are not publicly available. The requirement to provide 50% M4(3) accessible housing should therefore be removed as it is not justified or evidenced.

Additional accessibility requirements

It is noted that points c to g of the plan introduce additional accessibility requirements. Paragraph: 008 Reference ID: 56-008-20160519 of the housing optional technical standards are clear it states **'Where a local planning authority adopts a policy to provide enhanced accessibility or adaptability they should do so only by reference to Requirement M4(2) and/or M4(3) of the optional requirements in the Building Regulations and should not impose any additional information requirements (for instance provision of furnished layouts) or seek to determine compliance with these requirements, which is the role of the Building Control Body. They should clearly state in their Local Plan what proportion of new dwellings should comply with the requirements. There may be rare instances where an individual's needs are not met by the wheelchair accessible optional requirement – see [paragraph 011 below](#).'**

Points c to g should therefore be deleted as they fall outside of clearly stating what proportion of new dwellings should apply with M4(3) or M4 (2).

30% Affordable Housing requirement onsite

Point 3 of policy HC4 confirms that it is expected that C2 retirement community schemes should provide 30% affordable housing on site, this is the same rate as that required by policy HC2 affordable housing.

To support the affordable housing requirement, the Council has undertaken a Viability Assessment entitled 'Whole Plan Viability Assessment, Swindon Borough Council (HDH, August 2025) ('Viability Assessment'). As part of the Viability Assessment, we note that both brownfield and greenfield

options for housing for older people has been tested and this includes typologies for sheltered and extra care housing.

For three scenarios, sheltered brownfield, extra care brownfield and extra care greenfield a negative residual value is shown (table 10.12) and extracted below for assistance.

Table 10.12 Specialist Older Peoples Housing, – Residual Value v BLV. £ per ha

			EUV	BLV	Residual Value
Site 13	Sheltered 60 Brownfield	Brownfield	2,500,000	3,000,000	-74,416
Site 14	Sheltered 60 Greenfield	Greenfield	25,000	375,000	866,069
Site 15	Extracare 50 Brownfield	Brownfield	2,500,000	3,000,000	-2,477,487
Site 16	Extracare 50 Greenfield	Greenfield	25,000	375,000	-730,863

Source: HDH (August 2025)

The Viability Assessment concludes at para 10. 72 and reconfirmed at para 12.85 that:

‘The results show that, with 30% affordable housing, Sheltered housing is likely to be viable on greenfield sites, but not on brownfield sites. Extra care housing is unlikely to be viable with affordable housing’. The paragraph continues to state ‘As set out above the PPG anticipates that viability on such sites will be considered at the development management stage’

The viability assessment has also tested a number of flatted schemes all of which have been found to be unviable.

One of the key risks in bringing forward proposals for older persons housing development is the general expectations in relation to affordable housing and other planning obligations which inevitably lead to viability negotiations. This aspect of a planning application is often uncertain and protracted and is a key risk for investors in the sector given the issue is technical and often misunderstood by key stakeholders. Expectations should therefore be established appropriately at the plan level in line with NPPG requirements.

The policy requirement raises a number of areas of concern:

1. Whether the viability of older persons housing has been tested correctly for affordable housing
2. Whether specialist housing for older people has been tested correctly given that flats are found to be not viable.
3. Whether affordable housing can be delivered on site
4. Whether the PPG does anticipate that such sites will be considered at the development management stage or not.

1. Whether the viability of older persons housing has been tested correctly

The PPG on Viability confirms at para ‘Paragraph: 002 Reference ID: 10-002-20190509 that

*‘The role for viability assessment is **primarily at the plan making stage**. Viability assessment should not compromise sustainable development but should be used to ensure that **policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan**.....Policy requirements, particularly for affordable housing, should be set at a level that takes account of affordable housing and infrastructure needs and allows*

*for the **planned types of sites and development to be deliverable, without the need for further viability assessment at the decision making stage.***

Paragraph 004 Reference ID: 10-004-20190509 of PPG then confirms what is meant by a typology approach to viability.

'A typology approach is a process plan makers can follow to ensure that they are creating realistic, deliverable policies based on the type of sites that are likely to come forward for development over the plan period.....

In following this process plan makers can first group sites by shared characteristics such as location, whether brownfield or greenfield, size of site and current and proposed use or type of development.....

*Average costs and values can then be used to make assumptions about how the viability of each type of site would be affected by all relevant policies. **Plan makers may wish to consider different potential policy requirements and assess the viability impacts of these. Plan makers can then come to a view on what might be an appropriate benchmark land value and policy requirement for each typology.***

*Plan makers will then engage with landowners, site promoters and developers and compare data from existing **case study sites to help ensure assumptions of costs and values are realistic and broadly accurate**.....Plan makers may then revise their proposed policy requirements to ensure that they are **creating realistic, deliverable policies.***

Although the Council have assessed the Viability of the older persons housing typology within their supporting viability assessment, it has not been possible to make an assessment of this as the appraisal has not been appended to the study. We have requested to view this but although the council have acknowledged it exists have simply implied that they will consider publishing this at the regulation 19 stage. We have asked for these and reserve the right to comment further once they have been published / provided. We would welcome engagement between the regulation 18 and regulation 19 consultation on this matter.

Despite not being able to view the detailed appraisals, we have assessed the information in the main body of the Viability Assessment and we have some concerns with regard to some of the assumptions that have been used and if amended would be likely to make sheltered and extra care housing even less viable and push sheltered housing on greenfield sites from being viable to not being viable. As such the Viability Assessment should be re-run for sheltered and extra-care housing using the assumptions recommended below.

We would direct the Council towards the Retirement Housing Consortium paper entitled 'A briefing note on viability' prepared for Retirement Housing Group by Three Dragons, May 2013 (updated February 2016 ('RHG Briefing Note') available from <https://retirementhousinggroup.com/rhg/wp-content/uploads/2017/01/CIL-viability-appraisal-issues-RHG-February-2016.pdf>. The RHG Briefing Note establishes how sheltered housing and extra care development differs from mainstream housing and looks at the key variables and assumptions that can affect the viability of specialist housing for older people. These key variables include unit size, unit numbers and GIA, non-saleable communal space, empty property costs, external build cost, sales values, build costs, marketing costs and sales periods and significantly variable benchmark land values

Unit numbers / GIA / Density

We note that the Viability Assessment has modelled a unit density of 120 dwellings per hectare resulting in a 60 unit scheme being modelled on a 0.5 hectare site for both the Sheltered and Extra-Care typology. However, a typical sheltered housing / retirement living scheme would consist of 45 dwellings on a gross site area of 0.45 hectares creating a density of 100 units per hectare. Extra care housing tends to have a lower density and a typical scheme would consist of 60 units on a 0.75 hectare site at a lower density of 80 units per hectare. Therefore, a scheme of 50 units should be modelled for sheltered housing and a scheme of 40 units should be modelled for extra care, both on a site of 0.5 hectares.

Unit Size

The Viability Study should amend the 1 bedroom apartment sizes as follows. These have evolved in recent years with the National Space Standards and M4 (2) requirements and allow for additional storage and circulation space to facilitate downsizing:

- 1 bed sheltered 55 sq m
- 1 bed extra care 60 sq m

Unit mix

A typical scheme provides 1 and 2 bedroomed apartments using a mix of 60% 1 bed and 40 % 2 bed units on a development. This is the case for both sheltered (retirement) and extra care (retirement living plus) schemes. The Viability study currently models 50% 1 bed and 50% 2 bed.

Non-chargeable / communal space

Older persons' housing has a larger communal and non-saleable areas such as residents lounge, laundries, guest rooms, managers office and wellness rooms. Extra care housing also includes additional facilities such as a restaurant area. For sheltered schemes the non-chargeable space used should be 25% and for extra care schemes this should be 35% of GIA. We note that the Viability Assessment has used 20% and 30% respectively although we would remark that it is unclear if this has been applied correctly as in other assessments undertaken by the same assessor, the gross to net area has been assumed at 83% which is in no way representative of the typology.

Professional fees

Given that a large number of specialist housing for older people is delivered on brownfield sites, in our experience these often involve more professional advisors associated with contamination, legal fees, drainage, air quality, overheating, sunlight, noise amongst other areas. We would therefore recommend that a 10% of build cost figure is used for brownfield sites for professional fees rather than 8%.

Sales and marketing costs

As detailed within the RHG Briefing Note sales and marketing costs for older persons housing schemes are typically 6% of GDV and this should be used within the older persons modelling rather than the 3.5% level for general housing.

Sales periods

As discussed in the RHG Briefing Note, sales periods of older persons' housing schemes are typically longer for retirement and extra care housing than general needs housing. There is a typical 18 month build period before sales can commence. Sheltered and Extra care schemes cannot be phased but must be fully operational and completed from month 1 of sales / occupation. As detailed within the RHG Briefing Note, once sales commence a rough guide is that 40% of units will be sold at the end of the first year of sales, 30% during the second year of sales and 30% during the third period. This should be considered within the viability modelling. Whilst the Viability Study does say a longer period has

been included for specialist housing for older people, it is not possible to check this due to the appraisals not having been included in the appendices.

Empty property costs

It is recommended that a standard allowance of £5,000 per unit is assumed as a typical average empty property cost – to cover Council Tax liability on unsold units and service charges (which will be applicable to the whole building from day first resident moves in). This increases to £10,000 for extra care accommodation to reflect higher costs particularly in maintaining care, communal and catering facilities, staff and services and reflecting a slower sales rate than Retirement Living. It is noted that £4,500 per unit has been used for both sheltered and extra-care.

External build costs

From our experience external build costs tend to range from 8% to 15% of base build costs on flatted schemes within urban areas and we therefore feel that an allowance is 10% of base build cost should be used for external build costs for brownfield sites and flatted development rather than the 5% used in the Viability Assessment.

Developer Return

PPG sets out that 'For the purpose of plan making an assumption of 15-20% of gross development value (GDV) may be considered a suitable return to developers. However, for specialist housing for older people there is a clear precedent for a return of not less than 20% of gross development value primarily because of the risks associated with such developments. This is consistent with the Inspector's conclusions for appeals such as McCarthy Stone proposal at Redditch (Appeal Ref: 3166677), Churchill Retirement Living proposal at Cheam (Appeal Ref: 3159137) and the Churchill Retirement Living scheme at West Bridgford (Appeal Ref: 3229412) in 2019. 20% profit should therefore be assumed for specialist housing for older people rather than the 17.5% used within the study.

Therefore, Although we have not been able to check the assumptions used in the appraisal it is noted above that a number of assumptions used by the Viability study are incorrect and if the Viability update was re-run using these assumptions extra-care and sheltered housing would be likely to be shown to be even less viable in terms of delivering affordable housing.

2. Whether specialist housing for older people has been tested correctly given that flats are found to be not viable.

Housing for older people, being specialist in nature, is often high-density flatted developments delivered on small or medium sized sites of around 0.5 hectares located near town centres that have a minimum amount of around 35 to 40 units. As detailed above, the RHG Briefing Note establishes how sheltered housing and extra care development differs from mainstream housing and confirms that there are key differences that include unit size, unit numbers and GIA, non-saleable communal space, empty property costs, external build cost, sales values, build costs, marketing costs and sales periods and significantly variable benchmark land values. All of these make it more expensive to build retirement flats compared to mainstream flats.

The viability assessment identifies that flatted development is generally unviable and not able to deliver affordable housing. This is confirmed in Table 12.6a, 12.6b, 12.6c, 12.5c. Given that flatted development appears in the Viability Assessment as less viable than older persons housing and the additional costs that sheltered and extra care housing have over flatted development, it raises concern that the older persons typology has not been tested correctly and again emphasises the need to consider the appraisals that are referred to within the Viability Assessment but not published.

We are also concerned that despite flatted development being found to not be viable that the plan continues to apply a general 30% affordable housing requirement to this type of housing as well as specialist housing for older people. The council should consider exempting flatted development from affordable housing to ensure the plan is justified and consistent with national policy.

3. Whether affordable housing can be delivered on site

The policy as drafted implies that affordable housing associated with specialist housing for older people should be delivered on site. However, in relation to the practical provision of affordable housing for older people, we have engaged extensively with registered providers on this subject. The clear preference of registered providers is a desire to maintain management of their own apartment blocks rather than mixed management arrangements. The reasoning for this is the requirement to maintain control over service charges and affordability and not to be left in a position where the RP themselves needs to cover higher than average service charges during periods where the property is not let out to a tenant. Our experience is that even in the unlikely event of it being an equally viable option, there is no desire for registered providers to own and manage affordable housing within a mixed tenure age restricted development.

Our recommendation is that a bespoke approach to affordable housing is suitable for older person's housing proposals after the plan wide viability assessment determines what is viable for the typology.

4. Whether the PPG does anticipate that such sites will be considered at the development management stage or not.

We note that the Viability Assessment concludes, with respect to specialist housing for older people, at para 10. 72 and reconfirmed at para 12.85 that:

As set out above the PPG anticipates that viability on such sites will be considered at the development management stage'

In this, the Viability Assessment is referring to Paragraph: 007 Reference ID: 10-007-20190509 of the PPG. This confirms the circumstances where Viability Assessment may be appropriate at the decision making stage and confirms:

'Where up-to-date policies have set out the contributions expected from development, planning applications that fully comply with them should be assumed to be viable. It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. Policy compliant in decision making means that the development fully complies with up to date plan policies. A decision maker can give appropriate weight to emerging policies.

Such circumstances could include, for example where development is proposed on unallocated sites of a wholly different type to those used in viability assessment that informed the plan; where further information on infrastructure or site costs is required; where particular types of development are proposed which may significantly vary from standard models of development for sale (for example build to rent or housing for older people); or where a recession or similar significant economic changes have occurred since the plan was brought into force.'

The consultants, who undertook the Viability Assessment have therefore taken the view that older persons housing, despite its proven lack of viability at the plan making stage, can simply be assessed at the application stage. This appears to have been accepted without question by the Council as Plan Making body. Paragraph 10-007-20190509 of the PPG, falls under the heading of 'Viability and

Decision Taking' not 'Viability and Plan Making'. The Viability consultant t have used this paragraph to disregard the typology testing that has been undertaken for Plan Making and simply assert that older persons' housing can be tested at the decision making stage.

The Council have correctly tested the sheltered / retirement housing typology at this plan making stage, given the need, in line with para 004 Reference ID: 10-004-20190509 of PPG on Viability, but despite retirement /sheltered housing with affordable housing being found to be substantially not viable, the Council have taken the view, that such schemes can be subject to a viability assessment at the decision-making stage. If the Council and the Viability consultant are going to take this approach, it begs the question why it viability tested retirement housing in the first place? The answer is that it is the right thing to do following PPG guidance and it is not effective to then disregard the evidence.

This view as well as ignoring their own Plan Making evidence, contrary to NPPF para 31, will lead to further viability assessment at the decision-making stage and long, protracted, and probably adversarial, negotiations with Council officers and commissioned consultants and resulting difficulties with decision makers expecting policy compliancy and therefore impacting on delivery.

As the older people's housing typology has been tested through the Viability Assessment supporting the Swindon Plan and the typology found to be substantially unviable, requiring such sites to in effect, go through a Viability Assessment at the application stage is contrary to national policy. Any affordable housing requirement for older people's housing therefore creates an unrealistic, over aspirational policy requirement that will undermine deliverability. The plan as written, will not deliver much needed older peoples housing in line with need without further viability assessment and is therefore not justified or effective.

The approach is contrary to national policy guidance (NPPF para 31) and given the PPG on viability (Paragraph: 002 Reference ID: 10-002-20190509) the Council have not taken appropriate account of the Viability Assessment and policy HC4 should be modified to provide exemption for older persons housing schemes from providing affordable housing. This is to ensure the plan is realistic, sound, deliverable, justified and consistent with national policy. Planning applications for much needed Older Person's housing can then proceed without the need for further Viability Assessment at the decision-making stage with protracted negotiations. This approach would also be consistent with other Council's Local Plans. For example, both Swale and Fareham Borough Council's, based on detailed viability evidence have adopted Local Plan's that exempts older people's housing schemes from affordable housing. Fareham's also exempts older persons housing from their Community Infrastructure Levy charge. In addition Charnwood, Leicestershire who are towards the latter stages of their Local Plan examination, have also recently consulted on some main modifications that exempts specialist housing for older people from affordable housing, as well as removing the requirement for M4(3).

CSE6: Trees

Policy CSE6 Trees requires a future canopy cover of 25% or a contribution towards the Great Western community forest.

NPPF para 16. identifies that 'plans should b) be prepared positively, in a way that is aspirational but deliverable'. Para 136 provides guidance specifically associated with trees and states '*Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-led, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible. Applicants and local*

planning authorities should work with highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users’.

Requiring a 25% tree canopy cover on site, especially for small brownfield sites is not deliverable or realistic and could compromise sustainability development and is therefore contrary to NPPF. Any requirement would also need to be fully evidenced and the requirement incorporated into the viability study.

Recommendation: The council should therefore reconsider this element and ensure any such policy approach introduces more flexibility or is deleted.

Thank you for the opportunity for comment.

Yours faithfully

Natasha Styles

Natasha Styles
Senior Planning Associate



Respondent No: 338

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title

Mr

Q2. First Name

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Harris

Q4. Job Title (where relevant)

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Q5. Organisation (where relevant)

Emery Planning on behalf of Hollins Strategic Land

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[REDACTED]

[REDACTED]

[REDACTED]

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

SBC admin note: Please see attached response.

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

not answered

Swindon Local Plan Regulation 18

For Hollins Strategic Land LLP | 18-444

Local Plan Representations- Land to the north Turnpike Road, Blunsdon



Project: 18-444
Site Address: Land to the north Turnpike Road, Blunsdon
Client: Hollins Strategic Land LLP
Date: 3 October 2025
Author: Stephen Harris

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Contents

1.	Introduction	1
2.	Response to Policies	2
3.	Proposed Allocation Site (Ref 18-031)	4
4.	Appendix EP1 – Location Plan	8
5.	Appendix EP2 – HSL Delivery Record	9

Appendices

- EP1.** Parameters Plan
- EP2.** HSL Delivery Record



1. Introduction

- 1.1 Emery Planning is instructed to submit representations to the Swindon Local Plan Regulation 18 Draft (hereafter referred to as the 'LPR18') on behalf of the Hollins Strategic Land (hereafter referred to as 'HSL'). HSL have an interest on the land at Turnpike Road, Blunsdon which is located to the south west of the village and is bounded by Turnpike Road to the west with the A419 beyond, the B4019 to the north and open land to the east and south. A planning application (S/OUT/19/0467) for 80 dwellings is pending. A site location plan and parameters plan is provided at **Appendix EP1**. The site is a proposed allocation (ref 18-031).



2. Response to Policies

SP2: Homes for the Community

2.1 Paragraph 62 of the Framework states:

“To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.”

2.2 Local Housing Need is defined in Annex 2 of the Framework:

“The number of homes identified as being needed through the application of the standard method set out in national planning practice guidance.”

2.3 Paragraph 003 of the PPG states:

*“Is the use of the standard method for strategic policy making purposes mandatory?
The standard method should be used to assess housing needs. However, it is recognised that there are some specific circumstances in which an alternative approach could be justified, for example as explained at paragraph 014 below.”*

2.4 Therefore, the standard method is mandatory in Swindon. The Standard Method sets out a minimum need for 1,205 dwellings per annum which equates to 24,100 dwellings over the plan period.

2.5 With the standard method as a minimum, the only other alternative in the PPG is a higher requirement which is expressly set out in paragraph 14 of the PPG and paragraph 69 of the Framework which states:

“The 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”.

2.6 The Local housing needs assessment 2024¹ considers this point and states:

“Certain stakeholders in the consultation process advocated for an uplift to the Standard Method housing need figure to help address pent-up demand for affordable homes alongside helping to meet economic job growth. It should however be noted that the affordability adjustment built into the Standard Method calculation also accounts for past under-delivery of affordable housing as described in Paragraph 011 of the PPG so a separate adjustment for this is not suitable. In addition, the parallel study on future

¹ 03.01



job growth in the Borough has (subsequent to the stakeholder event) been published and has shown that the labour supply arising from the Standard Method growth is sufficient to meet all of the projected job growth.”

- 2.7 Therefore, at this stage the housing requirement should continue to be a minimum of 1,205 dwellings per annum.

Flexibility/Buffer

- 2.8 The Housing Trajectory states that the total delivery is 25,796 dwellings which is broken down as follows:
- Net Completions (2023/24) – 831
 - Planning Permissions Granted – 12,767
 - strategic site parcels without planning permission from the 2026 Local Plan - 3,498
 - Allocating new sites – 8,344
- 2.9 Paragraph 6.7 states that this provides a buffer of over 1,000 homes excluding potential windfall sites. However that equates to 7%.
- 2.10 We consider that there should be a buffer of at least 10% which is based on the Local Plans Expert Group report to the Communities Secretary and to the Minister of Housing and Planning where a 20% buffer was recommended. The report recommends at paragraph 11.4 that the Framework should make clear that local plans should be required to demonstrate a five year land supply but also focus on ensuring a more effective supply of developable land for the medium to long term, plus make provision for, and provide a mechanism for the release of, sites equivalent to 20% of their housing requirement, as far as is consistent with the policies set out in the Framework.
- 2.11 We do note that there is a targeted Call for Sites for sites under 1 hectare will run in parallel to this consultation so this should add additional flexibility to the supply and is a point for the LPA to review at Regulation 19 stage



3. Proposed Allocation Site (Ref 18-031)

3.1 We support the allocation of

Suitability

3.2 The PPG² states:

“A site or broad location can be considered suitable if it would provide an appropriate location for development when considered against relevant constraints and their potential to be mitigated.”

3.3 The proposed allocation follows the site’s inclusion in the 2025 SHELAA (Ref s0036) which continued the conclusion of the previous 2013 and 2019 versions that the site is developable. A planning application (S/OUT/19/0467) was submitted in 2019 with all site specific matters addressed with the exception of the cumulative impact of the application and the other applications.

3.4 At the request of the Highway Authority the proposal was revised to accommodate two access points, one from Turnpike Road and one from Blunsdon Road, to facilitate some relief for the Coldharbour junction. The revised access arrangements and illustrative masterplan were submitted and the Highway Authority submitted their comments on 3rd December 2019 confirming no objection. The Highway Authority’s response was that the proposal would assist in *“reducing delay through the Cold Harbour junction and will assist in delivering the Kingsdown Allocation Site”*. The access strategy and the benefit for this site remains.

3.5 Whilst our application was being determined other applications in the area were also submitted and National Highways submitted holding objections to all of the applications. The Council called a meeting in the council chamber with the Blunsdon applicants, highway officers and National Highways to discuss the cumulative impact on the highway network. Our application was therefore not able to be taken to the April 2020 committee.

3.6 Therefore, with the exception of highways all site-specific matters were addressed so the intervening period and delay was due to assessments of highway capacity by National Highways. That was resolved earlier this year and the sole issue for delaying a decision in 2020, which was highways, is now resolved.

3.7 The cumulative impact was considered in paragraphs 5.4.31 to 5.4.32 of the SA which state:

“5.4.31. As discussed, the existing Kingsdown strategic allocation has a resolution to grant outline permission for 1,552 homes and this supply is counted as ‘committed’. The

² Paragraph: 018 Reference ID: 3-018-20190722



question is whether there is a case for additional allocations to support comprehensive growth and noting the extent of recent sub-optimal piecemeal growth in the area.

5.4.32. In this context, the current proposal is to additionally allocate seven sites for a total of 515 homes, namely:

- *Land at Sams Lane (southern part) (Turley) (s0050b) – 115 homes (5.1 ha)*
- *Land at Turnpike Road (s0036) – 93 homes (4.1 ha)*
- *South of Highworth Road (s0062) – 89 homes (5.9 ha)*
- *North of Kingsdown Lane (s0375) – 77 homes (3.4 ha)*
- *Kingsdown Nurseries (Turleys) (s0380) – 64 homes (2.9 ha)*
- *Land at 12 Turnpike Road (Marrons / Bellway Homes) – 48 homes (2.1 ha)*
- *Stubbs Hill Farm (part) (s0536) – 29 homes (1.9 ha)*

3.8 The second bullet of paragraph 5.4.33 of the SA states:

“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.”*

3.9 Therefore, the LPA supports comprehensive growth in the northeast urban edge of Swindon and the sites are allocated, including the HSL site.

3.10 As noted above the site is the subject of a planning application. The application (S/OUT/19/0467) has also been the subject of consultation on all environmental and technical issues. Overall, the site is suitable.

Availability and Achievability

3.11 With regard to Availability, the PPG states:

“A site can be considered available for development, when, on the best information available (confirmed by the call for sites and information from land owners and legal searches where appropriate), there is confidence that there are no legal or ownership



impediments to development. For example, land controlled by a developer or landowner who has expressed an intention to develop may be considered available.”

3.12 As to Achievability, the PPG³ states:

“A site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period.”

3.13 The land is controlled by HSL, an experienced land promotion company. There are no restrictive covenants or ransom strips associated with the site. Suitable access can be achieved onto Broadbush and Turnpike Road. Therefore, the site is controlled by a willing landowner, and there are no legal or ownership issues that would prevent development. **Appendix EP2** is a summary of the delivery record of HSL in recent years. The Council can proceed in the confidence that the site is achievable and can be delivered in the first 5 years of the housing land supply. Therefore the trajectory should be adjusted so that the site delivers in full in years 5 (27/28) and 6 (28/29).

Conclusion

3.14 The benefits that the site can deliver which are:

- The delivery of new housing in an authority which cannot demonstrate a five-year supply by a considerable margin on a site that is a draft application in the Swindon Local Plan (regulation 18).
- The delivery of 30% affordable housing, which will contribute towards the significant need in Swindon.
- Economic benefits in the form of direct and indirect employment opportunities during construction and throughout the lifetime of the development through increased household spending in the local area.
- The access strategy for two access points with link road which would facilitate relief for the Coldharbour junction.
- A net gain in biodiversity that accords with Policy EN4 and Strategic Objective SO9.

3.15 The site is suitable, available and deliverable. We therefore propose the site as an allocation which would provide flexibility in the housing delivery approach by providing a site capable of delivering in years 1-5 of the plan period.

³ Paragraph: 020 Reference ID: 3-020-20190722





4. Appendix EP1 – Location Plan



5. Appendix EP2 – HSL Delivery Record

Track Record of Delivery

Site	Scale	Approved	Housebuilder	Status
Gatley, Stockport	278	Jan 2025	tbc	Marketing
Witherley, Hinckley & Bosworth	50	Feb 2025	tbc	Marketing
Broughton, Preston	51	Apr 2024	Oakwood Homes	Reserved Matters
Haydock, Merseyside	118	Sep 2023	Anwyl Homes	Reserved Matters
Widnes, Halton	200	Nov 2024	Bloor Homes	Under Construction
Purton, Wiltshire	47	Jul 2022	Cala Homes	Under Construction
Willington, Bedfordshire	50	Jul 2022	Dandara	Under Construction
Bodicote, Oxfordshire	46	Nov 2019	Lucy Developments	Under Construction
Adderbury, Cherwell	40	Sep 2021	Hayfield Homes	Completed
Semington Road, Melksham	144	Sep 2021	Barratt	Completed
Staveley, Derbyshire	400	Aug 2020	Barratt	Completed
Westhoughton, Lancashire	58	Nov 2018	Hollins Homes	Completed
Chippenham, Wiltshire	72	Mar 2018	Wainhomes	Completed
Mistley, Essex	67	Apr 2019	CALA Homes	Completed
Broughton, Lancashire	97	Apr 2018	Watkin Jones	Completed
Newton-with-Scales, Lancashire	50	Aug 2017	Hollins Homes	Completed
Dowbridge, Lancashire	170	Jan 2017	Story Homes	Completed
Calne, Wiltshire	83	Jul 2016	David Wilson Homes	Completed
Blackrod, Bolton	110	Apr 2016	Rowland Homes	Completed
Bramley, Hampshire	65	May 2016	Taylor Wimpey	Completed
Farnsfield, Nottinghamshire	48	Apr 2016	Bellway	Completed
Hoyles Lane, Preston	48	Nov 2015	Jones Homes	Completed
Whitchurch, Shropshire	57	Dec 2014	Hollins Homes	Completed
Kepple Lane, Garstang	130	Dec 2014	Barratt	Completed
Shepshed, Leicestershire	270	Nov 2014	Persimmon	Completed
North of Eastway, Preston	140	Mar 2014	Barratt	Completed
Eastway, Fulwood, Preston	22	Dec 2013	Hollins Homes	Completed
Cookes Lane, Northwich	74	Nov 2013	Stewart Milne	Completed
Barton, Preston	65	Jul 2013	Rowland Homes	Completed
Alsager, Cheshire	65	Jan 2013	Miller Homes	Completed
Lightfoot Lane, Preston	70	Nov 2011	Charles Church	Completed
Hesketh Bank, Lancashire	35	Oct 2011	Rowland Homes	Completed



Grove Farm, Chorley	75	Aug 2011	Bellway	Completed
Wheelock, Sandbach	41	Sep 2010	Taylor Wimpey	Completed
3,386 homes across 34 successful sites (as of October 2025)				







Respondent No: 339

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[REDACTED]

Q1. Title not answered

Q2. First Name Francesca

Q3. Last Name Parmenter

Q4. Job Title (where relevant) Partner

Q5. Organisation (where relevant) David Lock Associates on behalf of Hallam Land, Hannick Homes and Developments Ltd and Taylor Wimpey UK Ltd (HHT)

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

The Spatial Strategy HHT 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. HHT support investment in the town and the ambitions of 'Heart of Swindon', we question 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. The homes are anticipated to be delivered through regeneration efforts, a mechanism for town centre regeneration will need to be put in place. Regeneration schemes typically involve unpredictable and lengthy implementation processes. 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. It is reasonable to conclude therefore that supply will need to be bolstered and secured through other sources of supply, not least at the NEV, where there is already certainty of a pipeline of supply of homes, and investment in infrastructure to support that growth. Having regard to the uncertainty of delivery of a significant element of planned supply, it is not only reasonable, but necessary, to ensure soundness of the Plan, to proceed with a strategy that acknowledges and secures the additional growth potential at the NEV through the policy wording of "at least" 10,000 homes over the Plan period.

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

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 at the NEV through the SGL02 NEV policy wording of “at least” 10,000 homes over the Plan period. This wording would improve the soundness of the Plan insofar as it helping to demonstrate a strategy that is effective and justified.



Respondent No: 340

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Q1. Title not answered

Q2. First Name Francesca

Q3. Last Name Parmenter

Q4. Job Title (where relevant) Partner

Q5. Organisation (where relevant) David Lock Associates on behalf of Hallam Land, Hannick Homes and Developments Ltd and Taylor Wimpey UK Ltd (HHT)

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

HHT 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. HHT support the identification of Great Stall East and Lotmead (emerging) and South Marston incl. village extensions /Rowborough (emerging) as rural service centres, - medium sized settlements with reasonable accessibility and regular public transport connections.

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: 341

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Francesca

Q3. Last Name Parmenter

Q4. Job Title (where relevant) Partner

Q5. Organisation (where relevant) David Lock Associates on behalf of Hallam Land, Hannick Homes and Developments Ltd and Taylor Wimpey UK Ltd (HHT)

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

The proposed allocation Hallam Land, Hannick Homes and Developments Ltd and Taylor Wimpey UK Ltd (HHT) strongly support the inclusion of the New Eastern Villages (NEV) with the draft Local Plan acknowledging that it continues to play an important and central role in the future plan-led growth of Swindon to 2043 indeed there is already investment and commitment to delivery from the development industry. HHT therefore supports the identification of SGL02 and the evidenced contribution it will make to meeting housing needs for Swindon. HHT also support the refinement of the policy wording that is less prescriptive (reasonably so given the strength and portion of commitments that sit as part of the assumed supply) but still to retain the key structuring principles that have shaped existing character and form of development at the NEV, for example 'new inter-connected settlements and an expanded South Marston village defined by the network of green infrastructure corridors'. These are principles through which NEV schemes have been shaped. Indeed, having regard to the proportion of the total proposed quantum that is already consented, it would seem perverse to now generate additional spatial / land use requirements that could frustrate or compromise the proposals already in place, both consented and emerging. The local plan policy framework for the NEV is currently supported by a number of SPDs that further guide, some more prescriptively, development approaches. For the reasons set out, it is HHT's view that to update all SPD documents would appear unnecessary, given the quantum of land use that is already consented, with the exception of the reconsideration and update as necessary the approach to planning obligations (NEV Planning Obligations SPD), including infrastructure prioritisation matrix, having regard to the amount of S106 that is already secured (existing s106 obligations should not be re-opened) and infrastructure projects that have been delivered and/or fully funded. Our comments to the policy components are set out below.

Part 1– Quantum HHT has always recognised the additional capacity available at the NEV, above the 8,000 homes currently referred to in the adopted Local Plan (NC3) and therefore support the uplift to 10,000 to be expressed through the amended policy to reflect the permissions that have followed the original allocation. However, as some 7,340 homes already have outline consent, we question the effectiveness of expressing this as an 'up to' figure which suggests limits the flexibility that must evidently be afforded to this strategic allocation, as evidenced through the current adopted plan, having regard to permissions that form part of the supply. The wording of the adopted policy "about" 8,000 homes provides due flexibility. There is no reason to move away from this approach. HHT support the amendment of the New Eastern Villages boundary, at Rowborough East, to align with the land now consented through 13/1555/OUT.

Part 2 - placemaking and infrastructure considerations

Bullet a) refers to proposals being supported by a masterplan, indeed reflecting the usual approach for development proposals that present their spatial arrangement through a masterplan or similar. HHT therefore assumes that the 'masterplan' as referred to relates to each specific development proposal, and is not a bound to nor prescribed by a more strategic design process (in the way that the reference to 'comprehensive' might infer), indeed this would not be appropriate especially having regard to the number of permissions already extant for this growth location and the development areas (form and use) which will be settled and assumed. A related point is that we assume that the NEV illustrative masterplan (that currently sits as part of the NEV Planning Obligations SPD) will no longer be referred to, since it is now out of date and proposals have evolved significantly (point d below relates).

Bullet d) refers to proposals providing the necessary supporting infrastructure, in line with the NEV Planning Obligations (PO) SPD. This was adopted in October 2016 in support of the currently adopted Local Plan Policy of the NEV (NC3) to support the delivery of development identified at 8,000 homes. A reduced quantum to that now proposed through the new Local Plan. Furthermore, the NEV PO SPD is some 9 years old. It is critical therefore that if the PO SPD is to remain, it must be updated to reflect the new policy, deleting what is no longer necessary (i.e reflecting infrastructure already secured or delivered) and focusing specifically on securing proportionate supporting infrastructure in line with the NEV Prioritisation Matrix that is proposed to be updated (Part 3 comments relate).

Part 3 – NEV Prioritisation Matrix. HHT involvement in bringing forward development at the NEV means that we are well placed to understand the costs associated with funding significant infrastructure mitigation packages to support growth at a strategic scale, both developer delivered and financial contributions, and the impact on the viability of development and the delivery of wider policy objectives. The NEV prioritisation matrix has been a useful tool to ensure consistency of decision making, but it historic. We note that the draft Local Plan does not yet have a draft matrix available for comment (placeholder at Appendix 5) and so we will provide our thoughts in due course as part of the next stage of Local Plan consultation.

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.

Whilst we have made comments to the wording and sought some clarification on the broader direction of travel for strategic allocations, HHT do not as yet propose any changes, save for the quantum point, to the draft policy wording, as the policy framework for the allocation continues to evolve (ie. approach to SPDs and NEV Prioritisation Matrix), that is a fundamental point, to which we reserve the right to provide comment as the policy framework evolves. Part 1– Quantum “at least” 10,000 homes over the Plan period.



Respondent No: 342

[Redacted]

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Q1. Title Ms

Q2. First Name Rachel

Q3. Last Name Wyness

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[Redacted]

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

I am against ANY NEW new development in Wroughton as it is over populated already. The Volume of traffic is heavy eg Highway Safety Policies. Flooding in North Wroughton and NO Maintenance to Roads GP, can't get appointment and waiting lists to get your children in to Wroughton schools Proposed New Homes and SP Broadway North Wroughton development IN Wroughton I object to NEW Development in Wroughton, as it's over developed already unsustainable Impact of heavy traffic North Wroughton and through Wroughton (New access roads to new development) (Highway Safety policies) Flooding on Main Roads North Wroughton and over Houses and back gardens in Moore Close No Maintenance to Roads and over load of sewer capacity Loss of daylight and Privacy in Moore Close as the boundary line is My back garden/Design and layout of new development Conservation of buildings, trees and open land Protection of the Countryside and Wildlife Noise, disturbance, House Vibrations and Constant Dust from construction as I have Asthma (Health) The Schools, Doctors, GWR will not House the over population of new Homes The length of construction of new developments and at the back of my house (Mental Health) Division in Wroughton and Swindon is Constant SBC is spending our Money on useless unneeded changes like the new Bus station etc Why Bring new developments to our village as Swindon is full of Homeless and druggies and its unsafe. There are NO shops and run down Increase of high lighting SBC Plan 2016 - 2026 (Have already exceeded Dwellings Our Village will not be a Village If NEW development proceed. SBC will change Wroughton to East Swindon as NEW Signs Have gone up in Swindon Eg South Swindon by the tesco roundabout.

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

- No New Homes - New School - New Doctors - Protect our country side/Wildlife - Wroughton fly over is a death trap - Noise shields and survey to Already Populated Dwellings With New construction development



Respondent No: 343

[REDACTED]

[REDACTED]

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- Q1. **Title** not answered
- Q2. **First Name** Robert
- Q3. **Last Name** Colett
- Q4. **Job Title (where relevant)** Associate Director
- Q5. **Organisation (where relevant)** Luken Beck LTD obo Places for People

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

SBC admin note: Please also see attached response

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

not answered

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

13th October 2025

By email only: swindonlocalplan2043@swindon.gov.uk

Dear Sir

REPRESENTATIONS TO THE SWINDON LOCAL PLAN 2023-2043 REGULATION 18 CONSULTATION DRAFT

I write on behalf of our client, Places for People, to submit representations to the Swindon Local Plan 2023–2043 Regulation 18 Consultation Document and associated evidence base.

Places for People control land at Marlborough Park, which is not currently proposed for allocation within the draft Local Plan, but which is located within a sustainable location within the draft Pipers Way Urban Regeneration Area (UGA 02), where development is promoted by policies SS1 and SS2 and could deliver approximately 300 new homes, towards the Council's housing supply. These representations are accompanied by a separate 'call for sites' submission for this site (site location plan enclosed).

We are generally supportive of the overall intentions and aspirations of the emerging Plan, particularly the focus on delivering new homes in sustainable locations, and the strategy of directing development towards existing urban areas with high-quality transport links, such as the Swindon Urban Area Sustainable Development Locations. This principle is strongly supported and is considered consistent with the requirements of the National Planning Policy Framework (NPPF), which seeks to focus growth within sustainable locations.

However, we are concerned that several draft policies miss opportunities to maximise housing delivery over the plan period to fully meet the Borough's identified requirement. In particular:

- An over-reliance on existing site allocations carried forward from the Swindon Borough Local Plan 2026, as such the ability to rely on the future delivery of currently undelivered allocations is unclear
- Policy UGA 02 (Pipers Way) lacks appropriate aims and aspirations to promote comprehensive development within this area and maximise growth, in accordance with the overarching principles set out at SS1 and SS2
- There is a disconnect and lack of clarity between the draft Policy Map and Policies and supporting text within the draft Local Plan, with key allocations such as Sustainable Growth Corridors being undefined in terms of extent and indication of appropriate development within these locations
- Several overly prescriptive policies impose requirements that could significantly increase development costs, threatening the viability of schemes and leading to delays in the delivery of much-needed new homes

Taken together, these issues place the emerging Local Plan at risk of being found unsound under the relevant tests set out at Paragraph 36 of the NPPF (December 2024), which require that plans are:

- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs¹⁹; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*
- b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*
- c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*
- d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.”*

While we support the Plan’s strategic direction and its emphasis on sustainable urban growth, the current draft does not yet provide a robust or deliverable framework to meet Swindon’s housing needs in full. Without further refinement to improve deliverability, flexibility and viability across key policies and allocations, the Plan risks being found unsound and failing to achieve its objectives of supporting sustainable, timely and inclusive housing delivery across the Borough.

Support – Policy SS1 (Swindon’s Spatial Approach to Growth)

The aims and aspirations for spatial strategy set out at Policy SS1 (Swindon’s Spatial Approach to Growth) are generally supported, to direct growth, including housing growth, to the Swindon Urban Area Sustainable Development Locations, including the Urban Regeneration Areas. This represents the most appropriate and sustainable location within the Borough to accommodate development, in accordance with the principles of sustainable development set out in the NPPF.

Support – Policy SS2 (Settlement Hierarchy)

We support the recognition of Swindon as the principal and most sustainable settlement in the Borough, appreciating its range of employment, retail, facilities, services, cultural establishments and public transport, to support residents of the town and to act as a hub for the wider area. We also support the Swindon Urban Area Sustainable Development Locations (which includes the Urban Regeneration Areas) as the main focus for strategic growth in the Borough.

Object – Draft Policy Map / ‘Key Transport Corridors’

In association with Policy SS1, the Draft Policies Map identifies areas that fall within Sustainable Growth Corridors (SGCs), shown with a blue wash edged in green. However, the Local Plan provides no reference to, or commentary on, these Sustainable Growth Corridors.

The terminology and approach used within the Policies Map should align with that of the Local Plan, with a clear definition of a Sustainable Growth Corridor, together with an explanation of what forms of development are considered appropriate within it, either within supporting text or policy wording. Furthermore, there is no explanation or justification for how land has been identified within these corridors, nor for the specific distances applied to areas designated as ‘Sustainable Growth Corridors’ from the identified Key Transport Corridors.

It appears that the SGC allocation extends approximately 450 metres from key transport routes, but this approach fails to consider individual locations or sites and fails to accurately consider sustainability and it should not follow that development outside of this area is inappropriate in sustainability terms.

Object - Policy SP2 (Homes for the Community)

We support the reference to the increased housing requirement set out at Policy SP2 (Homes for the Community), to reflect the changes introduced by the NPPF (December 2024) and the need to plan for the new standard method housing requirement to deliver 1,205 homes per annum in the Borough, equating to 24,100 new homes over the period to 2043. The Policy should, however, be more positive to growth and reflect this requirement as a 'minimum' rather than as an absolute figure, as it does not represent a limit or ceiling to development. This would ensure that the policy is flexible and positively prepared, consistent with national policy guidance, and avoids setting an artificial ceiling on housing growth.

We object to the suggested sources of supply set out in the second criteria of this policy, as this is not extensive or reflective of the spatial approach to growth or the settlement hierarchy set out at Policies SS1 and SS2. Whilst the criterion a) references 'encouraging and supporting mixed-use development in the Central Area', the criterion fails to mention, let alone promote, the housing requirement being achieved by maximising and directing growth to the Swindon Urban Area Sustainable Development Locations or recognising the potential that this area holds in sustainably accommodating growth within the Borough, which is of critical importance to achieving the Plan's objectives. In particular, the Policy also fails to recognise the importance that the Urban Regeneration Areas hold in meeting the requirement and these should be explicitly referenced within this criterion.

Object – Supporting Text: Swindon's Housing Requirement

Although we support the overall strategy for the housing requirement to be met through a combination of housing completions, commitments and site allocations set out at Paragraphs 6.5-6.6, we do not consider this to be comprehensive enough to recognise the contribution of all supply types in helping to meet the requirement, with, for example, no reference to the important contribution that windfall sites can make, which are an important source of housing supply.

It is noted that Paragraph 6.6(i) references significant reliance on the delivery of currently undelivered site allocations from the current Local Plan to meet the housing requirement (over 33% of the remaining housing requirement). We would question the extent that this source can be relied upon as a robust or realistic source of housing, as they have failed to deliver over the current plan period.

We support the identification of a buffer of over 1,000 homes to the housing requirement, in accordance with best practice, although we would request that the housing supply is appropriately tested to ensure that this is buffer sufficient to meet the housing requirement.

The Council should consider allocating additional, deliverable sites within the Swindon Urban Area Sustainable Development Locations, such as at our client's land Marlborough Park, that is within the Pipers Way Urban Regeneration Area, and would accord with the aspirations set out at Policies SS1 and SS2 and assist in strengthening the supply position. The Marlborough Park site can deliver approximately 300 new homes on land that is available for development, suitable (through its sustainable location) and achievable (by being in developer control).

Object - Policy UGA 02 (Pipers Way)

We support the principle of the Pipers Way Urban Regeneration Area, to deliver new housing growth for the Borough and we support the inclusion of our clients land at Marlborough Park within this broad policy area. We are concerned, however, that whilst this Policy includes broad areas of land, this Policy lacks any clear direction and overall aims or aspirations and fails to make clear the role and function of land included within this area that is not allocated for development.

Policy UGA 02 only allocates three individual sites for development, leaving extensive areas, including our client's land, with no identified purpose and makes no reference to any additional opportunities for development within the wider Pipers Way Urban Regeneration Area outside of those allocations. This undermines the aims and aspirations of Policies SS1 and SS2, which seeks to maximise development opportunities within the Swindon Urban Area Sustainable Development Locations.

It is considered that this Policy should be amended to make it clear that opportunities for development within Urban Regeneration Areas (UGA) is encouraged and the development of land should be maximised, to help achieve the Borough housing requirement.

In order to help improve the soundness of the draft plan, in particular through boosting the supply of housing both in terms of numbers and phasing, we strongly encourage the Council to include the land at Marlborough Park as an allocation within Policy UGA 02 for the delivery of 300 new homes, as this is a highly sustainable location where the principle of development is achievable without any significant or overriding development constraints and is owned by a developer, to confirm that it is an available, achievable and deliverable site.

In addition, although the objective of promoting sustainable transport links between sites allocated within the UGA is understood, the requirement for a single strategic masterplan across all three allocations (plus any additional allocations that may be added) is impractical. The sites differ in ownership, context and character, and their separation makes a coordinated masterplan unrealistic. This requirement risks delaying housing delivery rather than facilitating it. Each site could more effectively contribute to regeneration objectives through individual site-specific masterplans guided by clear overarching principles. Guiding principles could include factors such as ensuring high-quality movement corridors and permeability; securing pedestrian and cycle linkages; promoting sustainable travel and integration with public transport; and supporting cohesive design and character across sites.

In addition, the requirement of developments within the UGA to provide financial contributions towards a bus transport corridor does not appear to be supported by any real evidence of this requirement being proportionate or necessary and we have concerns that obligations such as this set within Policy will have significant impacts upon the viability of proposals within the UGA and will constrain housing delivery. Contributions such as this should be considered on a case by case basis and not required as an overarching policy for development in the area.

We support the intentions of Policy UGA 02, namely to promote regeneration in a sustainable location and enhance connectivity through public transport, cycling, and walking, but in its current form, the policy is unlikely to achieve these aims. The Policy as currently drafted is ineffective, lacks flexibility, and risks constraining rather than enabling regeneration. By broadening the scope of the policy to include all suitable sites within the identified area, including our clients land at Marlborough Park, and by focusing on clear, deliverable design and connectivity principles rather than prescriptive master planning, the Council can create a more effective, positively prepared, and deliverable policy that genuinely supports the Plan's strategic housing and regeneration objectives.

Support - Policy SD1 (Effective Use of Land)

We are supportive of Policy SD1, which seeks to make effective use of land through optimising density whilst remaining sympathetic to the surrounding environment. Paragraphs 129 and 130 of the National Planning Policy Framework (December 2024) set out that planning policies should promote the efficient use of land and avoid homes being built at low densities. Policy SD1 is therefore consistent with these national objectives, and we support its intent to ensure land is used effectively to deliver much-needed homes in appropriate locations.

Comment - Policy SD3 (High Quality Design)

We are supportive of Policy SD3, which promotes high-quality design and requires developments to positively contribute to the character and function of the surrounding area in both the short and long term. We also support the requirement for all new dwellings to meet Nationally Described Space Standards (NDSS), ensuring that homes provide suitable living conditions for future occupiers, although the requirement to achieve this standard should not undermine housing delivery, where it can be demonstrated that it is not viable to do so.

We question the specific requirement set out at criterion 4a, to avoid single-aspect apartments, and suggest that this should be deleted from the Policy. This is because good quality living environments for occupiers of apartments can be provided through high quality design, that does not require an avoidance of single aspect units. Furthermore, criterion 4d requires private external space equating to a minimum of 10m² per apartment, or 5m² per apartment within the Town Centre. Whilst the principle of providing access to external amenity space is supported, the quantitative requirement is considered excessive and overly prescriptive. For larger apartment schemes for example, meeting this requirement could necessitate disproportionately large communal gardens, leading to inefficient use of land and potential conflicts with the objective of Policy SD1.

We recommend that the policy be amended to allow for flexibility, requiring appropriate and well-designed external amenity space, either private or communal, without stipulating a specific area. This would enable high-quality, viable, and efficient schemes that deliver meaningful outdoor space without compromising density or site efficiency.

Support - Policy HC1 (Housing Tenure and Sized)

We support Policy HC1, which seeks to deliver balanced and mixed communities with a range of tenures and house sizes that reflect local housing needs. A requirement to include a mix of 1- and 2-bedroom homes is generally welcomed, where this is required to meet demonstrable housing needs and provide for varied and mixed communities, although it is considered that reference should be made in this Policy to housing mix being reflective of local housing need, in accordance with the SHMA.

Object - Policy HC2 (Affordable Housing)

Places for People, as a Registered Provider, are highly experienced in the delivery and management of affordable housing and recognise the importance of Policy HC2 in ensuring inclusive and balanced communities. We support the overall 30% affordable housing requirement, which aligns with wider local and national objectives to increase access to affordable homes.

However, we are concerned by the proposed tenure split, which requires 78% of the affordable homes to be for social rent. Whilst we recognise a need for social rented homes within the Swindon area, this level of requirement is considered difficult to achieve for a number of reasons. The viability of schemes could be severely constrained by the delivery of a significant proportion of homes for social rent, impacting developers' ability to deliver the overall quantum of affordable housing and may effect overall affordable housing delivery within the Borough. It is requested that that detailed viability evidence is provided at the Regulation 19 stage, which assesses whether development can be viably delivered with this level of social rented provision. Furthermore, it is considered that the policy wording should also enable an alternative tenure mix to be agreed with the Council, by reference to a viability assessment, to avoid an unnecessary constraint and delay to housing delivery.

Comment – Policy HC3 (Accessible Housing)

We support the principle of improving accessibility within new housing developments and agree that a proportion of homes should be built to M4(2) and M4(3) standards to meet the needs of an ageing and diverse population. The application of such standards however should be balanced against housing need and consider the viability of

development and not undermine housing delivery where it can be demonstrated that it is not viable to achieve these standards.

Support - Policy ST1 (Promoting Sustainable Travel) and Policy ST5 (Parking and Electric Vehicle Infrastructure)

We support the aims of Policies ST1 and ST5, which promote sustainable travel choices, reduce reliance on the private car, and ensure parking provision and EV infrastructure are proportionate and well-designed. The aspirations of these policies align well with Place for People's approach to sustainable development, particularly at Marlborough Park, where residents will benefit from access to a key sustainable transport corridor providing direct links into Swindon town centre.

Comment - Policy SP6 (Climate Stability and the Environment)

We are supportive of policies that address the environmental impacts of development and promote climate change mitigation and adaptation. While the overall objectives of Policy SP6 are supported, criterion 1(k), which requires electricity to be the first source of temperature control and energy use where viable, is considered overly prescriptive. Rather than applying a blanket requirement, this should form part of a wider suite of sustainability measures assessed through a Sustainability Assessment, allowing the most appropriate and effective solutions to be identified for each site, in accordance with the requirements of Building Regulations.

Imposing a single-source energy requirement risks overlooking more balanced, innovative, and site-specific sustainability measures. We therefore recommend that Policy SP6 and related sustainability requirements be applied flexibly, guided by site-based sustainability assessments to ensure the most effective and deliverable outcomes.

Comment - Policy CS1 (Carbon Reduction and Sustainable Design in New Development)

We consider that the requirements within Policy CS1 should be combined with those in Policy SP6, as both share the same overarching aim of tackling climate change, reducing carbon emissions, and promoting sustainable design.

We fully support the principle of ensuring new developments are energy-efficient and sustainably designed. However, the policy should prioritise site-specific sustainability assessments to determine the most suitable measures for each development. A prescriptive, one-size-fits-all approach risks undermining innovation, viability, and the delivery of high-quality sustainable places.

Comment - Policy CSE2 (Whole Life Carbon Assessments (WLCA))

We support the ambition to deliver genuinely sustainable developments that achieve measurable carbon reductions. This policy however lacks clarity on the requirement for Whole Life Carbon Assessments and the standards to be achieved and it is requested that further detail is identified.

We are committed to delivering high-quality homes that meet local needs with reduced environmental impacts, however it is not considered that Whole Life Carbon Assessments should be required on all developments above 49 homes and consideration must be given to development costs and viability, and the policy include suitable wording to allow flexibility in application, where it is not viable to do so, so that it does not unnecessarily undermine or constrain housing delivery.

Object – CSE3 (Green Infrastructure in New Developments)

We fully support the inclusion of high-quality green infrastructure within new developments. However, the introduction of quantitative targets such as Urban Greening Factors risks imposing potentially unviable requirements. While we share the Council's aspirations for greener places, policies should allow flexibility to balance

greening, density, and viability to ensure that development remains deliverable. Focus should be on high quality landscaping schemes that respond to specific site characteristics rather than arbitrary numerical targets.

Object - Policy CSE6 (Trees)

We agree that trees and existing habitats provide an essential role in place-making and environmental quality and we support the inclusion of trees within development and recognise the visual, amenity and ecological benefits that they bring. However, the requirement to achieve 25% canopy cover across all developments is inflexible, and conflicts with the NPPF objective to make efficient use of land.

Tree provision should be guided by site-specific considerations, landscape character, and urban design principles, not by a fixed percentage figure. We support the sentiment of increasing canopy cover but recommend revising the policy to focus on quality of landscaping and integration, rather than an unachievable numerical target.

Comment - Policy CSE8 (Biodiversity, Geodiversity and Nature Recovery)

Policy CSE8 seeks to ensure the protection and enhancement of biodiversity and geodiversity across the Borough. We fully support this objective and the principle of delivering measurable biodiversity improvements through development. However, the policy largely repeats the Environment Act's statutory requirement for a minimum 10% Biodiversity Net Gain (BNG) on all development sites (unless exemptions apply).

As this requirement is already set out in national legislation and guidance, it does not need to be restated within the Local Plan. Instead, the policy should simply reference national policy and legislation on Biodiversity Net Gain, allowing flexibility for any future updates to Government guidance or changes to the metric. This approach would ensure that the Local Plan remains current and avoids unnecessary duplication or risk of inconsistency with national requirements.

Object - Policy U1 (Wastewater, Sewage Infrastructure and Water Supply)

We support the overall aim of ensuring adequate water supply and infrastructure for new development. However, criterion 10, which mandates the use of water re-use technologies such as rainwater harvesting and greywater recycling unless proven unviable, is onerous. Water efficiency is a matter addressed by Building Regulations and the policy should seek to promote water efficiency in accordance with those standards.

Object – Policy HL1 (Health Impact Assessment)

We support the overall aim of ensuring that new development contributes to creating healthy, inclusive, and well-designed places that meet the needs of the communities they serve. Promoting health and wellbeing through design should remain a fundamental principle of all development.

However, we do not agree that requiring a formal Health Impact Assessment (HIA) for proposals of over 100 units is an appropriate or effective mechanism to achieve this objective. While the intention behind the policy is understood, in practice the requirement risks becoming a procedural exercise that adds cost and delay without delivering any tangible improvement in health outcomes.

The creation of healthy places is best achieved through good design principles that are embedded within the planning process from the outset, rather than through an additional layer of assessment. The mandatory submission of a HIA would impose unnecessary burdens on developers and potentially slow housing delivery.

Instead of requiring a separate HIA, the policy should set out clear and practical guiding principles for promoting health and wellbeing, against which planning applications can be assessed. This would ensure that health objectives

are integrated into the design process in a meaningful and proportionate way, without adding further procedural barriers to delivery.

Comment - Policy HL4 (Child Friendly Places and Play)

We support the aspiration of providing inclusive spaces for play and recreation. However, the policy's singular focus on children overlooks the needs of other community groups. The policy should be reframed to promote inclusive design that meets the needs of all residents, including children, older people, women, and those with disabilities.

The opportunity to comment on the Swindon Local Plan 2023-2043 Regulation 18 consultation draft is appreciated and it is respectfully requested that the Council takes into account the comments made and support the proposed site allocation of the land at Marlborough Park, in order to help accommodate the Borough's housing need and improve the soundness of the plan in accordance with the NPPF.

We would welcome the opportunity to meet to discuss these representations and the land at Marlborough Park further, however in the meantime please do not hesitate to contact me if you have any queries.

Yours faithfully



Robert Collett BA(Hons) MTP MRTPI PIEMA
Associate Director



Encs: Site Location Plan
Call for Sites Form



Respondent No: 344

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[REDACTED]

Q1. Title

Ms

Q2. First Name

Ruth

Q3. Last Name

Sumner

Q4. Job Title (where relevant)

not answered

Q5. Organisation (where relevant)

Keep Swindon Tidy, Plastic Free Swindon

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

(SBC admin note: transcribed from scanned submission) I've spent considerable time on this, but did find it rather muddled - hope that's not just my incompetence. For instance, a map was given me, but it had no key and I couldn't find reference to it in the text, unless it was the Policy Map? Numerous acronyms www completely mystifying e.g. AFOLU, and there was at least one bit of jargon that I couldn't make sense of - "permeability" of a railway line? Rather idiosyncratic punctuation, too, and a very inadequate index. More importantly, I've met almost nobody who knew about it, leave alone the deadline of tonight, and it wasn't at all prominently signposted even in the Central Library. If there's another consultation like this in future, maybe local groups like u3a could be informed, as well as the radio stations? Sure there are other methods/channels too. The most salient thing is probably that, time after time, there seem merely to be suggestions not first instructions for policies; for example, page 93 "Proposals should strive to..." which should surely state that proposals MUST do unless there's a compelling reason, transparent to all, why the desired objective can't be achieved. Further examples on pp. 92, 95, 100, 106, 108, 109, 114, 117, 119, 120, 121. As they have repeatedly done in regard to quotas for social housing, for example, developers may unfortunately be expected to wriggle out of commitments that will interfere with their profit margin if they are allowed to get away with it! A bit of an aside, but couldn't permissions for blocks of flats with a caretaker, for example, mandate that the surroundings be kept litter-free and tidy. The Old Laundry in Whitehouse Rd and Wiltshire Court are both pretty disgusting - though keeping on top of littering is an endless and thankless task. (I'm a proud member of Keep Swindon Tidy). Can it be true that local councils spend resources getting people fined for fly tipping, but

central government then guzzles all the money? If right, a preposterous disincentive! Needs to change! With waste, mostly plastic, being the UK's principle export (!), with ever-increasing evidence of the damage done to all living things, including ourselves, by plastic particles; with the volume of (plastic) rubbish we generate increasing all the time; and with the Borough having expressed in a fairly recent meeting with Plastic Free Swindon the desire to support initiatives to reduce plastic as well as all other types of waste, it was shocking that the Plan contained no reference at all to this lethal problem (one person every 30 seconds, worldwide, is estimated to die due to plastic!!). Also, Swindon is hardly set to be either greener or better if it remains so hugely befouled with rubbish as it is at present! E-waste fastest growing waste stream. (Below was handwritten in the margin beside these paragraphs) It is very desirable that a block of flats have a common room so folk can get to know their neighbours, can use for family gatherings and similar. (Below is a continuation of the main text body)

Transport If we are to achieve a sustainable future, a town worth living in with air that's fit for breathing, we need to get people out of cars and into good public transport, if not walking or cycling. For a start, diabetes is reckoned to cost UK £14bn per annum and rising, with one pound in ten of NHS spending going to diabetes and its complications. This is mostly type 2 diabetes, related to poor diet, obesity and inactivity, and incidence is rising. After their introduction, people tend to favour ULEZ zones, even if they were initially opposed. Time behind the wheel is lost time, whereas on the bus you might text, ever work, listen to something absorbing safely, knit, converse. In a traffic jam an internal combustion engine causes the driver to inhale lots of fumes - not to mention other people. Every vehicle generates brake dust, plus microplastics from its tyres and its paint. It seems that bus journeys to Oxford must go round all the villages, as they take about 75 minutes to travel only 30 miles or so and there seems to be no bus to Bristol. Is this sensible? People complain the Bus Boulevard means too much walking (for infirm folk). Swindon's pedestrianised centre attracts those with limited mobility, so this is a shame. Similarly, there are lots of complaints that Barnes Coaches can't use the Boulevard. There need to be clear signs pointing to the loos. A panel by the pedestrian crossing indicating which buses stop where would be useful, too. That Boulevard is really going to put people off in the winter! Don't we need better shelters? Could retired wind turbine blades be upcycled??! Bus routes changed weeks ago, but Stagecoach still haven't marked some of the stops their vehicles now serve, leave alone the bus times! Does there need to be far more secure provision for bikes to be left at the Railway Station and similar places. I heard recently that the police won't/ can't even investigate many thefts! Do we need warm/cool spaces in the centre? There's The Hub, although its gaping doorway haemorrhages heat, making it draughty. They're being crowded out as life gets increasingly privatised, but there need to be safer, appealing spaces, warm and dry in inclement weather, in the public realm, where people can interact without spending cash? This fosters community (I've just read the shocking stats re deprivation in our town). Especially in the Heart of Swindon, could we have ideas for kids? A tree trunk carving of the croc they can clamber on? The clever man who created Gooch in GWR Park might oblige? Take a selfie... Hopscotch? Snakes & Ladders with a twirly thing instead of a dice? A Heritage Hunt with items related to local history to spot, like a loco up a lamppost, that could be changed from time to time? Swindon Society/Live well/Wildlife Trust could make suggestions. Would talking bins encourage folk to put trash in the right place? I came up with: Feed me cans and feed me bottles (if they are clean), and paper too. Don't risk a fire by chucking rubbish! Bin it or take it home with you. One thing that attracted us to Swindon in the early 60s was the schools - libraries, parks, buses, health provision - we just took for granted I think, didn't realise how good the planning was! Conversely, roads on new estates looked like a pile of spaghetti - it was a puzzle to find your way from one side to the other. There was lots of grass, but mostly verges/areas for kicking ball games, so needing ongoing expenditure and upkeep but very little use to man or beast or child. Energy Very small local renewables schemes could really help us get out of dependence on foreign fossil fuel forms, be at the mercy of vagaries of the market as well as despoiling our poor planet & stealing the children's future a bit less. Solar & batteries are improving, getting cheaper, all the time. I think it's in Spain that shop car parks are covered in solar panels, generating electricity & providing shelter. The King put it well: Nature doesn't belong to us, we belong to Nature.(Last week's episode of the Radio 4 program "What's Up Docs?" and the connected "Doctor's Notes" podcast featured objective and fascinating evidence as to just how much Nature does for us. Recommended.) Phew! Sorry so much of this is hand written.

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: 345

[REDACTED]

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- Q1. Title not answered
- Q2. First Name Tim
- Q3. Last Name Partridge
- Q4. Job Title (where relevant) Technical Director Planning
- Q5. Organisation (where relevant) Tor & Co. on behalf of Cooper Estates Strategic Land Limited

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

1.0 Introduction 1.1 This representation is submitted on behalf of Cooper Estates Strategic Land Ltd, who own land on the western edge of Swindon. The submission seeks a more strategic approach in the new Local Plan, with Swindon and Wiltshire looking jointly at sustainable options for residential growth at West Swindon. 2.0 Submission 2.1 The Swindon emerging plan, whilst only a Reg 18 consultation, is placing We agree that Swindon Borough Council should meet in full the local housing need, calculated according to the standard method, we also agree that the plan should cover at least a 20 year period 2023 – 2043. At the present time this would cover 15-years from the intended date of adoption, that being December 2027 (Swindon LDS March 2025). We would however note that, any delay in progressing to the Reg 19 consultation, currently expected Spring 2026, and/or any subsequent delays through the examination process will erode this 15 year period, such that the plan period would no longer meet the minimum requirement as referenced at para 22 of the NPPF. Subject to progress, at Reg 19 stage it would be prudent to extend the plan period to 2044 or 2045. 2.2 Notwithstanding the end date of the plan, the current 20 year period results in a minimum housing requirement of 24,100 homes. This has been translated directly into the local plan, as the plan housing requirement. Little consideration has been given to a higher housing requirement, despite the PPG advice (2a- 040-20241212): “The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The National Planning Policy Framework explains that the housing requirement may be higher than the identified housing need, and authorities should consider the merits of planning for higher growth if, for example, this would seek to reflect economic growth aspirations. Where authorities plan for higher growth this should not normally have to be thoroughly justified at examination.” 2.3 The

Sustainability Appraisal Interim Report (SAIR), dismisses a higher requirement approach in one short paragraph (5.2.12) on the basis of a lack of national and/or sub-regional strategy that would evidence higher growth, equally with reference to a lack of local evidence related to the Employment Land Review. This dismissal is disappointing in the context of Swindon's economic growth aspirations, and given clear recognition of the locational advantages enjoyed by the town and growth opportunities that do exist. More work should be undertaken to explore whether unlocking the "huge economic potential" (SAIR para 5.2.16), and regeneration aspirations would be assisted by a higher growth scenario and therefore a higher housing requirement. 2.4 In this context, and given the clear recognition that, "Wiltshire clearly relates very closely to Swindon and, indeed, it can be argued that the Swindon housing market area stretches a considerable way into Wiltshire, plus the M4 functional economic area clearly links the two authorities." (SAIR 5.2.9), it is surprising and again disappointing that Swindon has not sought to work closely with Wiltshire is pursuing growth to the western side of the town. Again the SAIR dismisses opportunities for cross-border working, through the Duty to Cooperate, on the basis that Wiltshire is constrained and it's housing need has significantly increased beyond the level currently being planned for. However, West Swindon, within Wiltshire district, is not so constrained, and could accommodate growth to the benefit of Swindon and Wiltshire. 2.5 Following on from the above, it is surprising and contrary to positive planning there is no mention of unmet housing need in the plan, with hardly any reference to Wiltshire and no reference to the Duty to Co-operate. Clearly, the release of land on the west side of Swindon, in Wiltshire, would provide a sustainable location to meet unmet need, supporting economic growth across the functional economic and housing market, under the Duty to Co-operate. 2.6 While draft Policy SP5, Better-Connected, Active Neighbourhoods commits the Council to develop and improve upon the Borough's existing transport network, by promoting sustainable transport options and particularly seeking to encourage active travel, and whilst Wiltshire also seeks sustainable patterns of development to reduce travel needs, it is incongruous that opportunities for cross boundary supply have been ignored. Indeed, to help create better-connected, greener neighbourhoods and improve the health and wellbeing of residents by building on the opportunities created by Swindon's excellent location, as stated as being sought by the plan, cross-boundary considerations cannot be ignored. To improve connectivity between other key economic and scenic hubs such as Oxford, Wiltshire and the Cotswolds, and to consider associated housing growth needs, the draft Local Plan must consider cross boundary housing supply. The Reg 18 plan falls short of the Duty to Cooperate in this respect and is not sound in terms of being positive and/or effective. 2.7 Swindon is tightly constrained by its administrative boundaries but serves a unique and important role in the north-eastern part of Wiltshire County. The town presents the most sustainable development potential within the Swindon Housing Market Area', which is not restricted to Swindon's boundaries but clearly extends into Wiltshire district. This context should be positively acknowledged and the plan should be developed accordingly. In short, administrative boundaries should be ignored, in order to pursue and secure a more sustainable pattern of development. Such an approach would open-up opportunities to develop a wellconnected, logical, extension to Swindon, noting that Swindon has already expanded into Wiltshire and the strong sub-regional links already exist. 2.8 Taking this further, we note that the Reg 18 plan places significant reliance on urban intensification/regeneration and a number of already planned strategic sites to meet the local housing need of 24,100 homes across the period 2023 – 2043. This reliance is ill-founded, given that these sources have failed to deliver significant growth, including housing, in over ten years. 2.9 First, Marlow Avenue and Pipers Way are identified as Urban Regeneration Areas, and are designated on the Policies Map. Marlow Avenue is proposed to bring forward 976 new homes over the Plan Period whilst Pipers Way is proposed to bring forward 844 new homes over the Plan Period. These regeneration aspirations need to be supported by clear action and investment, and are unlikely to deliver significant volumes of affordable housing. They should be viewed as regeneration opportunities, delivering economic benefits, recognising any viability challenges and better acknowledging the 'delivery risk' (SAIR para 5.4.22), rather than relying on these sites as a fundamental element of meeting the housing need. 2.10 Second, it is unrealistic to assume that all planning permissions granted (12,767 homes) will be delivered. A lapse rate should be factored in, to ensure that the starting position is realistic. 2.11 Third, we note that a number of strategic site parcels, without planning permission, have been brought forward from the 2026 Local Plan (3,498 homes). However, it is unrealistic to rely on all of these strategic allocations to deliver as currently anticipated. For example, New Eastern Villages (NEV) was a strategic allocation in the 2026 Local Plan for 10,000 homes. To date, no homes have come forward. The NEV includes Great Stall East where outline planning permission, S/OUT/17/1990, was granted in August 2021 for up to 1,550 homes. No reserved matters applications have been submitted for this site. The NEV also includes Lotmead where outline planning permission, S/OUT/19/0582, for up to 2,500 homes was granted in March 2021. Pre-commencement conditions remain to be discharged. At Redlands outline planning permission, S/OUT/16/0021, for the erection of up to 370 dwellings, was granted in June 2019. S106 Agreement have recently been completed and reserved matters submitted. Certainly at the current time, some of the land parcels are restrained by a lack of access

provision/agreements. Of the 10,000 homes allocated at NEV around 4,500 have some form of planning permission but have not commenced, these would be within the total 12,767 homes with consent, again bringing into question the assumptions and reliance on all of these, and all additional, homes being delivered. 2.12 Whilst with new allocations (of a further 8,344 homes) this provision is said to create a 'buffer' of 1,340 homes, in reality there is no buffer. 3.0 Conclusion 3.1 In conclusion, the draft Local Plan fails the Duty to Cooperate, is not positive, is not justified, and is not effective. It ought to take a more strategic approach with Wiltshire, looking at West Swindon as an opportunity for growth, to meet the sustainability, connectivity, and economic growth aspirations of both authorities.

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: 346

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Q1. Title not answered

Q2. First Name Anonymous

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Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

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

(SBC admin note: transcribed from scanned submission) We do not want and cannot support any new housing in the local areas due to the lack of services in area that are already overtaxed.

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.

Implement updated/ new services before any housing is started. Schools and Drs are priority.



Respondent No: 347

[REDACTED]

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

(SBC admin note: late submission) This section references the following documents – 1. 08.01_Landscape_sensitivity_assessment-2.pdf 2. 06.01_Green_infrastructure_strategy_2024_Part1.pdf 3. 03.04_Strategic_Housing_and_Economic_Land_Avai.pdf S0488 and S0488b – Highworth Old Golf Course We are pleased that Highworth's old golf course is not included within this Local Plan for housing development, and that the site is mentioned in the "01.02 Policies map Borough" as "Open Space". The bottom section – S0488 This section is designated as 'red' on the "Landscape Assessment Document" meaning it is a sensitive landscape site which holds recreational value. The top section - S0488b This section is not designated 'red' on the "Landscape Assessment Document", which under planning regulations, does not afford it the protection we seek. Only "Local Green Space", as sought by Highworth Town Council in their Draft Neighbourhood Plan 2, would provide that protection. This top section actually provides greater recreational value, due to its accessibility from the Town Centre (easy flat walking distance), along with how popular this part of the site is to Borough residents. S0488 and S0448b is special to Highworth and Borough residents, because – S0488b – Top northern section 1. The land includes a flat, well-drained top section that is easily accessible for those who are less mobile, and is

also suitable for pushchairs and wheelchairs. 2. The land lies within easy walking distance of Highworth town centre. By contrast, site S0488 occupies the lower, more distant section, which may be less accessible for some people 3. Highworth Town Council, working with a group of local residents, has submitted a proposal to transform the entire site into a Nature Park. The plan includes a nature-themed café, making use of the former golf shop building, as well as a natural burial ground. This scheme demonstrates how the site could generate income for the Borough while delivering significant community and environmental benefits. 4. This is the only piece of publicly owned accessible land that can be used for a nature park within the Borough. 5. The panoramic views stretching across to the Marlborough and Wessex Downs are a unique feature of this publicly accessible land, with no other spot in Highworth offering a similar outlook. 6. Housing on this site would irreversibly damage the lovely views of the medieval town for people approaching Highworth. 7. Since SBC allowed the public golf course to close in 2019, the site has seen a huge increase in people using it for their daily exercise, mental health and wellbeing. It has been recorded that on average, around 500 people use the old golf course every day for their exercise. 8. A petition of local residents in 2022 received 4540 signatures, not to build on the old golf course. The campaign to save Highworth's old golf course also has a Facebook page of over 1600 members. 9. Highworth's setting as an ancient hilltop town would be destroyed if any housing were to be allowed on S0488b and S0488 10. The New Local Plan only shows one site for development off Lechlade Road (Reg 18 Site Allocation 18-030), which gives a skewed picture of the sizable developments that are planned, recently completed, or under consideration for Highworth. 11. The same site was withdrawn from the previous SBC Draft Local Plan in 2021, due to public pressure. A record number of resident responses were made to the local Plan at that time, for this site. For example, the 03.04 Strategic Housing and Economic Land Availability Assessment_annex 1 map.pdf shows the following developments likely or underway for Highworth – • S0482 David Wilson Homes - 237 houses • S0109 Land adjacent to Aldi – 90 houses and a care home • S0293 Land west of Lechlade road – 40 houses • S0042 Land west of Lechlade road – 53 houses • S0547 Land at Hampton Hill – 99 houses • S0467 Land east of Rounds Hill Mead – 250 houses *see note 1 below • S0518 Land at Twelve Oaks Golf Course – unknown *see note 2 below In addition to the above, the following is also not shown on the same document above, all of which are planned, under construction, under consideration or completed in recent years. • NEW Land at Shrivenham Road 43 (see note 3 below) • Backhouse Phase 1 Swindon Road (completed 2024) – 67 houses • Backhouse Phase 2 Swindon Road – (Currently under construction) – 43 houses • RagView – Shrivenham Road – Built by Persimmon Homes 2019 – 50 homes The scale of these developments is excessive for the small ancient hill top town of Highworth. This New Local Plan regulation 18 document is also misleading in terms of the number of new houses likely for Highworth, which should be corrected. Note 1 – An active planning application is open for the S0467 Round Hills Mead site (S/OUT/25/0664 - Outline application for the erection of up to 250 dwellings (including affordable homes), points of connection of access roads from A361)). Site S0467 is shown on the SHELA Assessment Map mentioned above as 'Not suitable', but still progressing through the planning system. Note 2 – Land Agents presenting the S0467 proposed development to Highworth Town Council earlier this year, suggested that this development and S0518 could be developed together, under the heading of 'North Highworth'. Note 3 - land at 30 Shrivenham Road, Highworth, SN6 7BZ. McCarthy Stone presented to Highworth Town Council a few months ago their proposed specialist retirement development, exclusively for those aged over 60, together with indoor communal facilities, high quality landscaped gardens and on-site car parking. Although a formal planning application has not yet been submitted (likely soon), this development consists of approximately 46 one and two bedroom apartments.

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.

S0488b – Highworth Old Golf Course 1. For this site, please update the '01.02 Policies Map Borough' to designate it as Local Green Space, in line with the forthcoming Highworth Neighbourhood Plan 2, which is about to enter Regulation 16 (on 4th October), and as part of the area's green infrastructure. 2. Please update the Landscape Assessment Document to classify site S0488b as 'red' (unsuitable for development), consistent with the designation already applied to site S0488. This appears to have been an oversight.



Respondent No: 348

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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

[REDACTED]

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

(SBC admin note: transcribed from scanned submission) Wroughton in recent years has already been much expanded with reference to housing. The village can no longer cope with this poorly planned expansion. There are few or reduced facilities i.e. doctors, pharmacy, retail and reduced/ limited bus services. In addition, there are unresolved issues with flooding, deteriorated footpaths and roads, utility companies not adequately resolving service issues, principally 'Thames Water'.

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

No large housing developments. Improve infrastructure e.g. roads, paths. Improve facilities e.g. supermarket (not convenience stores), doctors/ pharmacy.



Respondent No: 349

[Redacted]

[Redacted]

[Redacted]

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Q1. Title Mrs

Q2. First Name Felicia Victoria

Q3. Last Name Webb

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[Redacted]

[Redacted]

[Redacted]

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

New Homes in Wroughton from Prospect Hospice to North Wroughton. I strongly disagree with this proposal for the following reasons: There has already been too much development in Wroughton and the immediate surrounding area, principally in Wichelstowe and its continuing expansion towards junction 16 of the M4 motorway. 1. Local roads are already suffering from massively increased flows of traffic. The noise, pollution and congestion caused by higher volumes of traffic, together with huge commercial vehicles, have negatively impacted on the quality of life in Wroughton, which used to be a quiet and attractive residential village location, separated from Swindon. Wharf Road is a prime example. Despite speed-indicating monitors, the majority of drivers ignore the speed limits. How about adapting the speed monitors to automatically issue fines to any vehicle exceeding the 30mph limit? The existing situation is unsafe and speed limits are unenforced. Building over 1000 new homes is likely to generate at least 3000 extra vehicles, all vying for space on the local road infrastructure. How will already overloaded roads cope with this huge increase? 2. I note that brown field sites in Swindon town centre are now being used for residential development. The council should make greater use of other brown sites. I deplore the degradation of green and agricultural land, which has been used to provide food for a growing population. The allotments in the proposed development area also fall into this category. Your proposed development is an illogical, short-term strategy. Why is the council not looking to the long-term needs of the local population? Has any thought been given to what will happen if this country becomes involved in a world conflict? Fewer farms, less agricultural land, an out of control population explosion will cause starvation situations, such as we already see in other parts of the world? This is a situation that you might be promoting! Is the council blind to the need for this country to become self-sufficient in feeding its population? 3. Recent developments in and close to Wroughton have overlooked essential local services, such as doctors' surgeries, pharmacies and dental facilities. Inadequate, short-sighted planning at the initial stages have resulted in serious concerns for local people, especially the elderly. A new influx of houses will exacerbate this further. Why is the provision of infrastructure left until any development plan is complete, when it should logically be put in place before people move in. 4. Wroughton, as a village and small residential area in earlier times, used to be a relatively crime-free area. What is happening now and whatever housing development might take place in the future, will continue to destabilise this situation. What preparations are being given to establishing a visible, local police presence (on the beat!), to prevent and deter such things as anti-social behaviour, the spread of graffiti, increased crimes such as shoplifting, all of which are rife in the centre of Swindon and which becomes problems wherever large concentrations of population exist and grow uncontrolled, transforming a local community into something unrecognisable from its original, traditional roots. 5. Lastly - but by no means least in importance - our local, natural environment has already been impacted too much by building developments, reducing both the natural habitats of animals and the provision of agricultural land that has been used in the past for essential food production. I am asking you, please to give earnest and full consideration to your proposals to ensure that any development that might take place as a result, is sensible, secure and right for the long-term future of this well established local community and its people. Your sincerely, Mrs.F.V.Webb

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: 350

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Anonymous

Q3. Last Name Anonymous

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

[REDACTED]

[REDACTED]

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

(SBC admin note: transcribed from scanned submission) As Wichelstowe has almost become a small town it has been noticed that all buildings are very close together with very, very small gardens. Eventually the area will become a ghetto.

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

As Wroughton has now turned from a village to an overcrowded area due to Wichelstowe, which is a huge area, have no Doctors' surgery or chemist. When planning was approved there should have been infrastructure as a condition. We are now way beyond capacity for any more building works. We cannot take any more houses as we are overrun.



Respondent No: 351

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title

Mrs

Q2. First Name

Lara

Q3. Last Name

Welsh

Q4. Job Title (where relevant)

not answered

Q5. Organisation (where relevant)

not answered

[REDACTED]

[REDACTED]

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

(SBC admin note: transcribed from scanned submission) Overall: Swindon's current infrastructure cannot accommodate 26,000 more homes. The hospital is already over capacity and struggling. GWH is smaller than the PMH that it replaced! The lives of Swindon's residents are already at risk with an A&E department that cannot cope. Residents from surrounding towns and villages also use this hospital and are also growing at similar rates. There do not seem to be any proposals to increase capacity at the hospital. Many of the roads are in a poor state and not fit to accommodate further traffic. Getting around Swindon is chaos at rush hour with long traffic jams. Water and sewage provision is already at capacity. We get it from other counties. How will facilities be increased to cope with the extra housing and ensure supply is not endangered. There needs to be sufficient green space for residents. This includes fields and 'natural' areas, not just designated parks. Many fields and farmland seem to be designated for houses. You are proposing to demolish Swindon's only theatre! Where is a new one being built and when? There are insufficient leisure facilities in Swindon for the huge population as it is. It doesn't make it an appealing place to live and misses an opportunity for revenue for the Town. Where will people work? Businesses seem to be leaving the Town not coming in... Lastly, there is plenty of land at Wichelstowe which has remained unbuilt on for many years. The roads and infrastructure is in place here (roads that lead nowhere!) when will these houses be built?! Turning to North Tadpole: Homes to be built here should be family homes, in keeping with the surrounding houses, with sufficient facilities on site such as a convenience store and play areas. It would not be suitable to have high density housing on this site. There have been rumours that a new connection to the A419 will be made. This would be wholly inappropriate as traffic through Tadpole Garden Village would increase hugely, with Greene Street and William Morris Way becoming unsafe. These are residential roads, not suitable for traffic to a dual carriageway. No doubt sat navs would direct traffic through the village as 'quickest route', via Oakhurst Way which is also unsuitable. Thamesdown Drive was built for this purpose (and is not residential). It would be dangerous and unfair for HGVs and heavy traffic to use these roads as a cut through to the A419. For the land surrounding William Morris Primary, trees, fencing and other privacy measures must be planted to obscure views to the school in order to protect children's safety and security. Traffic safety measures should also be put in place. Will a new school be built? William Morris Primary is at capacity and entry operates on distance criteria 'as the crow flies'. These new houses will be closer than most others in Tadpole Garden Village, meaning people already living in the village will not get into the school. Those children will therefore have to look further afield for schooling, which seems unfair.

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.

Capacity added at GWH, or a further hospital to be built on the other side of Swindon (perhaps junction 16 area) to cope with further housing in and around Swindon. Residents from surrounding towns also use this hospital and are also growing at similar rates. Reviews of the existing main roads in and around Swindon and measures taken to ensure that they can cope with the extra volume of traffic. Increase water and sewage capacity to cope with the growing population. Build a new theatre asap and attract new leisure facilities into the Town. Attract new businesses into Swindon so that the growing population has somewhere to work. North Tadpole: build suitable extra facilities to accommodate the additional housing, such as a convenience store and parks and consider schools. Ensure green space is provided to counteract the loss of the surrounding farmland and habitats provided for nature that is being pushed out.



Respondent No: 352

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Q1. Title not answered

Q2. First Name Derek

Q3. Last Name Smith

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

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

(SBC admin note: late submission) Oasis Leisure Centre Dear Madam/Sirs Please register my statement that the above should be saved in total, and none of them should be closed or demolished to build houses. I feel that the original lease with Seven Capital was for the leisure centre in total and not part of it. Swindon Borough Council should be fighting for this and not pandering to Seven Capital, especially if they genuinely believe that obesity is on the increase. Yours faithfully

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: 353

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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

[REDACTED]

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

You should know historically that side of Swindon Road v Moremead Road when developed floods with sewage. As a member of the parish council flood committee we fore warned what would happen but ignored

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.

Do not develop Swindon until a totally new sewage disposal plant is built, Barnfield is now no longer able to cope Since the road bridge is no longer fit for purpose which since it is only 50 years old Beg the question "Why" I would propose a new link road from the lister roundabout via a new bridge to link up the roundabouts at Pipers Way 'Nationwide' to divert the traffic for East Swindon before attempting to build a replacement for the existing bridge



Respondent No: 354

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Q1. Title not answered

Q2. First Name Anonymous

Q3. Last Name Anonymous

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

Environmental issues, flooding, bats, wild flowers, Owl's, Newts, Great crested newts, KEEP out of our 'VILLAGE' we don't want to be "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.

NO BUILDING ON GREEN SPACE. ONLY BROWN SITES. This form has been designed to put people off. Only one plan available in the village - over 200 words long Written to confuse. DISRESPECTFUL



Respondent No: 355

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- Q1. Title Mr
- Q2. First Name Rodney
- Q3. Last Name Hacker
- Q4. Job Title (where relevant) Head of Planning
- Q5. Organisation (where relevant) Wilts & Berks Canal Trust

[REDACTED]

[REDACTED]

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

SBC admin note: Please also see attached response. Comparison to Current Policy This policy, as worded, is significantly different to the equivalent policy in the 2026 Local Plan, Policy EN11, and the policy drafted for the 2021 consultation on the aborted 2036 Local Plan. The Trust has gained much experience from the operation of Policy EN11 and from other policies with a similar intent in adjacent local authorities. The comments here build on that experience with the aim of ensuring clear and consistent interpretation of the policy by all readers. Paragraph 1 The word "indicative" to describe the canal route in the current policy is replaced by "defined". It has been widely agreed with the Council's officers that the route shown is indicative and it is labelled as such on the Policies Map. Modifications to the route are accepted where substantiated by design work and, often, agreed with developers in line with the wording of Paragraph 1b). For example, in Eastern Villages a substantially revised route has been agreed and embedded in the outline planning consents for Lotmead and Foxbridge South villages; further South the route has been modified to avoid harm to newly discovered Roman archaeology. Not referring to the canal route as "indicative" in Policy SD9 could mislead readers. Paragraph 1 provides the core safeguarding as "safeguarded to maintain the possibility of the long-term re-establishment of the Wilts & Berks Canal and North Wilts Canal as navigable waterways." Sub-para a) and b) then distinguish between existing stretches of canal which are not to be harmed by development and aspirational stretches to be protected from development unless an alternative alignment is proposed. This distinction is not well-defined. The aspirational restoration programme includes both the original route and diversions where necessary and, in practice, the junctures between the two may vary slightly as schemes come forward. The two are not distinguishable on the Policies Map. Only the proposed restoration route is shown while the lengths which

might be protected as heritage only appear if identified on the underlying OS mapping. If there is a distinction to be shown it is between the historic lengths which should be protected for their heritage value and the proposed restoration route, including both original and new lengths, which should receive the fullest protection against adverse development. The wording of Policy EN11 in the 2026 Local Plan manages this better by safeguarding all of the original canal route and the new diversions and stating "Proposals will be permitted..... that are designed to develop the canal's recreational and nature conservation potential, in particular, the use of the old line of the canal for walking, cycling and interpretation." This makes it clear that safeguarding heritage is an important purpose of the policy in addition to safeguarding restoration of a navigable canal. In sub-paragraph 1a) the absolute protection against harm is good but could be seen to prevent necessary restoration work of the navigable canal which might require, for example, a crumbling lock or weak and narrow road bridge to be demolished and completely rebuilt. An allowance for such exceptional circumstances needs to be included in the policy. In interpreting sub-paragraph 1b) it is assumed that the last phrase contains a grammatical error and it should be read as "unless an effective alternative alignment is proposed." instead of "unless affected alternative alignment is proposed." "An effective alternative alignment" must mean one that is deliverable, i.e. it can be built and operated under reasonable conditions and at a realistic cost, otherwise the safeguarding is valueless. A factor, therefore, in the assessment of an alignment is the width of the corridor required to build the canal with its associated structures etc. The canal was often built in very restricted space. Modern design, accessibility and safety standards, and particularly the introduction of wider, safer, towpaths for use by pedestrians and cyclists, may require widening of the existing canal boundaries. The physical extent of safeguarding is a consideration for all lengths of the proposed restoration route. Paragraph 2 This paragraph says that proposals for restoration will be permitted subject to criteria in sub-para 2.a) which is that land necessary for the proper functioning of the canal and associated development, including land needed for maintenance, is secured for these purposes. The purpose of this paragraph would seem to be to ensure that restoration schemes coming forward will form part of a coherent restoration programme and not a white elephant for lack of ability to complete the overall project. The Trust is equally concerned that its efforts are not wasted and its charitable funding is used appropriately. Therefore, the Trust's work in preparing designs and planning applications for sections of the project is conditioned on the project being demonstrably viable in the longer term, appropriately set in the context of the overall restoration programme and timely in the sequence of the proposed development. The complete restoration project is over 110km long and is planned in a 25 years plus programme. It is being constructed in many individual and distinct projects often with their own planning consents to help define them. Even within Swindon Borough there is 25.4 km of protected route to be constructed in many phases over the same timeframe. While the total completion of a navigable route from end to end is the aim there will be interim periods when sections of the canal are partially completed and/or operated independently. It is clearly impractical to define exactly the land to be secured for the whole canal or even the Swindon length at the stage when a planning application is made for one section if 'secured' is interpreted as ownership or long lease on the land. The Trust did identify in response to the 2023 Call for Sites the likely land requirement according to best available information. Access to this land will be acquired over a long timeframe. The criteria in Sub-paragraph 2.b) for full assessment of environmental impacts and mitigation measures is consistent with normal practice for planning applications. The Trust's aim to restore the canal is to create an improved green and blue corridor containing the navigation channel, so meeting this criterion is core to any planning application for restoration works. A foundation for the Trust's environmental component of its restoration schemes is the biodiversity mapping and building environmental records for the green and blue corridor. Each restoration project will be designed to enhance biodiversity in an appropriate way.

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.

Proposal – Revise Paragraph1: Change ‘defined’ to ‘shown indicatively’ in the text of the policy. Proposal - Revise Paragraph 1: Address the above issues by redrafting as: 1 Existing and aspirational canal alignments, as shown indicatively on the Policies Map, shall be safeguarded to retain the possibility of the long-term re-establishment of the Wilts & Berks Canal and North Wilts Canal as navigable waterways. This will be achieved by ensuring: a) that the integrity of existing stretches of canal (and its remaining associated structures) are not harmed by development proposals except where works are essential to enable the restoration of the canal for navigation; and b) that stretches proposed for restoration, including existing and new stretches, are protected from development (including infrastructure), unless an effective alternative alignment is proposed. Existing stretches of the old line of the canal and its infrastructure that are not required for future navigation shall be safeguarded as heritage. Proposals will be considered that are designed to develop the canal's recreational and nature conservation potential; in particular, the use of the old line of the canal for walking, cycling and interpretation. Proposal - Revise Sub-para 2.a) to read: a) ensure land necessary to the proper function of the canal and associated development in the vicinity of the application site such as footpaths, bridges, locks, ponds, basins, including land needed for maintenance, is identified for these purposes.



Respondent No: 356

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Q1. Title

Mr

Q2. First Name

Rodney

Q3. Last Name

Hacker

Q4. Job Title (where relevant)

Head of Planning

Q5. Organisation (where relevant)

Wilts & Berks Canal Trust

[Redacted]

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

SBC admin note: Please also see attached response. The Policies Map shows the proposed restoration routes for the Wilts & Berks Canal and the North Wilts Canal. It does not distinguish between existing stretches and aspirational stretches. The Map does not show existing stretches which will not be used for restoration but safeguarded unless they are present in the underlying OS mapping. The line width is not significant to its interpretation but it may appear to be so when zoomed in. The use of a single colour for fill and the boundary line could reduce the risk of misinterpretation. The route shown is the same as shown on the Policies Map of the 2026 Local Plan. The route shown is indicative and is being refined over time in response to, for example; detailed design development, adjustment to new adjacent developments, agreements with developers or landowners and changing regulation. In 2023 the Trust was requested to respond to a call for new sites by providing the best available estimate of the route and land required for the canal. This was submitted in March 2023 with maps and a revised canal centreline in a format for integration with the GIS mapping. The same canal centreline is proposed with this response because there has been no change since 2023. The revised route incorporates the changes since the 2026 Local Plan was adopted. A summary of the main changes is given here. Fuller details and explanations are provided in the 2023 submission Land for the Canal in Swindon – A Response to the Call for Sites and in the accompanying complete Representation document of the Trust. The proposed route is shown in Figure 2: The Canal Route in Swindon in the complete representation document. The following notes refer to the named sections and updates to the route. 1) Hay Lane to M4 The middle of this section was adjusted in the design studies for the M4 Crossing. 2) Wichelstowe This route is fixed by the planning consents for the development 3) South Swindon Bypass The length near Hodson Lane has been adjusted to improve farm access and the road bridge location. 4) East Swindon Bypass This section has been subject to large adjustments caused by the introduction of the Southern Connector Road close by, the discovery of important Roman remains on the previous line and agreements with the developers for Foxbridge South and Lotmead Villages which have settled the route within their planning consents. 5) Kingshill to Wharf Green and Town Centre These are the most difficult sections for restoration of the whole canal and yet they are vital to the overall project aim of completing links with the rest of the UK's canal network. A fuller explanation of the situation and proposals is included in Appendix 1 to the accompanying full Representation document of the Trust which also includes the maps. Studies in the 2000s resulted in the Council and Trust preferring a diversion of the route from Kingshill along Faringdon Road and Fleet Street and then a link north to the crossing under the railway. It has become apparent that the route through those streets will never be achievable due to local traffic needs and it is unacceptable to other heritage interests in the area. The Trust therefore proposed reverting to the original line to get to Wharf Green or as close as possible. Completion of the last link to the railway crossing remains undefined because of the complexity of ownerships, commercial activity, traffic and development plans for this area. It remains as a long-term objective which will need close involvement in proposals for wider development of the area. Hence it remains as a dotted line on the proposed Policies Map. The recent heritage restoration and improvement works in the Railway Village area recognise the canal route and do not contravene its progress. 6) North Star and Great Western Way to Rodbourne The centreline has been adjusted very slightly while developing a scheme which relates more closely to development proposals by others for North Star and the Oasis. 7) Great Western Way to Moredon The canal route is shown following its original line but the eastern part the original route is now claimed by the industrial estate roads making it impossible to follow. Studies since 2015 have focused on at least some of the southeastern part of the route being diverted to run between the industrial buildings and the railway where it is shown on the revised plan. 8) East of Purton Road and Mouldon Hill No 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.

Proposal - Substitute the updated map of the canal alignment provided by the Trust into the Policies Map and indicate it by using a single colour for outline and fill.



Respondent No: 357

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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- Q1. Title Mr
- Q2. First Name Rodney
- Q3. Last Name Hacker
- Q4. Job Title (where relevant) Head of Planning
- Q5. Organisation (where relevant) Wilts & Berks Canal Trust

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

No change is proposed.



Respondent No: 358

[Redacted]

[Redacted]

[Redacted]

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[Redacted]

Q1. Title

Mr

Q2. First Name

Rodney

Q3. Last Name

Hacker

Q4. Job Title (where relevant)

Head of Planning

Q5. Organisation (where relevant)

Wilts & Berks Canal Trust

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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.

Proposal - In Policy SGL 01 Swindon's Central Area add to the list of key place objectives in paragraph 3: i). Restoration of the Wilts & Berks Canal: The long term restoration of the Wilts & Berks Canal as a navigable waterway will contribute to vitality of the area, respect the heritage, and provide a green and blue corridor for placemaking and improving general wellbeing.



Wilts & Berks Canal Trust

Representations on the Swindon Local Plan 2023 – 2043 Regulation 18 Consultation Draft

Protecting the Restoration of the Canal in Swindon

October 2025

Dauntsey Lock Canal Centre
Chippenham SN15 4HD
www.wbct.org.uk

Patron: Her Majesty the Queen
Registered in England and Wales No. 2267719. Registered Charity No. 299595

Representations on the Swindon Local Plan 2023 – 2043 Regulation 18 Consultation Draft

Protecting the Restoration of the Canal in Swindon

Contents

Executive Summary.....	2
1 Introduction	4
2 Background	4
3 Policy SD9: Heritage Transport	6
3.1 Comparison to Current Policy	6
3.2 Paragraph 1	6
3.3 Paragraph 2	7
4 The Protected Route on the Policies Map	9
5 Further Comments	11
5.1 Chapter 2 Our Vision and Objectives	11
5.2 Chapter 4: The Spatial Strategy & Strategic Area Policies	11

Appendices

Appendix 1 - The Town Centre Route – An Extract from the Response to the Swindon Borough Council Local Plan 2036 Submission Draft in January 2020



Executive Summary

A safeguarding Policy EN11 Heritage Transport is contained in the Swindon Local Plan 2026 and has been implemented with some success. The Wilts & Berks Canal Trust is making representations here on the revised draft Policy SD9: Heritage Transport and other matters contained in the new draft Swindon Local Plan 2023 - 2043.

Swindon is at the heart of the restoration of the Wilts & Berks Canal to create a huge public benefit. The canal habitat, through both urban and rural areas, supports a wide variety of wildlife in a green and blue corridor. In the urban centres the canal provides a 'place-making' feature to draw in the public with ready access to outward routes. The benefits to the community include increased economic and recreational activity, environmental enhancements, improved mental health and wellbeing, and new opportunities for employment. The benefits from the completed canal amount to £200 million pa with an eight year payback. In Swindon alone the increase in economic activity amounts to £16.5 million pa GVA and council tax increase from improved housing values will be about £2 million pa.

The Trust's experience of applying the canal safeguarding policy in the 2026 Local Plan has been used to inform our comments which are made below with the intention of clarifying and assisting the future application of the replacement draft policy SD9: Heritage Transport. Opportunities for the canal restoration to contribute to other aspects of the Vision for the town are also commented upon.

Purpose of proposed amendments

The Trust's proposals to amend Policy SD9 and the Policies Map are designed to:

- Clarify that the alignment of the canal route shown on the Policies Map is indicative.
- Clarify the distinctions between existing canal to be restored, aspirational stretches of the canal (route diversions), and stretches to be recognised for their heritage value but not to be restored for navigation.
- Safeguard all stretches of the canal route appropriately.
- Recognise proposals for new or restored stretches of the canal as parts of a larger project that may not be entirely self-contained operationally in the interim.
- Update the indicative route shown on the Policies Map in line with the route advised in the submission to the Call for Sites in March 2023.

A proposal is also made to recognise the potential value of restoring the canal in the town centre.

Proposals

A) Policy SD9 Heritage Transport - Revise Paragraph 1 to:

- 1 Existing and aspirational canal alignments, as shown indicatively on the Policies Map, shall be safeguarded to retain the possibility of the long-



term re-establishment of the Wilts & Berks Canal and North Wilts Canal as navigable waterways. This will be achieved by ensuring:

- a) that the integrity of existing stretches of canal (and its remaining associated structures) are not harmed by development proposals except where works are essential to enable the restoration of the canal for navigation; and
- b) that stretches proposed for restoration, including existing and new stretches, are protected from development (including infrastructure), unless an effective alternative alignment is proposed.

Existing stretches of the old line of the canal and its infrastructure that are not required for future navigation shall be safeguarded as heritage. Proposals will be considered that are designed to develop the canal's recreational and nature conservation potential; in particular, the use of the old line of the canal for walking, cycling and interpretation.

B) Policy SD9 - Revise Sub-paragraph 2.a) to:

- a) ensure land necessary to the proper function of the canal and associated development in the vicinity of the application site such as footpaths, bridges, locks, ponds, basins, including land needed for maintenance, is identified for these purposes.

C) Policies Map – Update indicative route of canal.

D) In Policy SGL 01 Swindon's Central Area add to the list of key place objectives in paragraph 3:

- i). Restoration of the Wilts & Berks Canal:

The long term restoration of the Wilts & Berks Canal as a navigable waterway will contribute to vitality of the area, respect the heritage, and provide a green and blue corridor for placemaking and improving general wellbeing.

1 Introduction

This submission by the Wilts & Berks Canal Trust to the consultation on the draft Swindon Local Plan 2023 - 2043 focuses on safeguarding the historic route of the Wilts & Berks Canal (including the North Wilts Branch) for preservation and restoration as a navigable waterway.

Swindon Borough Council has been supportive of protecting the heritage of the canal and restoring it as a navigable route for over 25 years. A safeguarding Policy EN11: Heritage Transport is contained in the adopted Local Plan 2026 and has been implemented with some success. A revised policy SD9: Heritage Transport is contained in the new draft Local Plan.

The sections of this submission summarise the background to the preservation and restoration work and use this experience to offer proposals for improving the policy. This is followed by a review of the indicative canal line on the Policies Map and further comments on to how and where the canal can add to the overall ambitions for the future of the community.

2 Background

Swindon is at the heart of the Wilts & Berks Canal and its North Wilts Branch. When completed the restored routes will provide links between the River Thames, the River Severn via the Cotswold Canals, and the Kennet and Avon Canal. They will form new leisure routes and enable circular travel paths for walkers, cyclists and boaters of all types, connecting towns through beautiful countryside, see Figure 1. The completion of a restored canal route through Swindon Borough, therefore, is critical to the success of the whole project.



Figure 1: The Wilts & Berks Canal and the Southern Waterways



The Wilts & Berks Canal Trust has strong support for its restoration work from the Wiltshire, Swindon and Oxfordshire Canal Partnership to deliver this exciting project for the recreational benefit of local communities and to create a green and blue infrastructure habitat for wildlife. Community support is strong and diverse, including huge support through social media and from visitors. 95% of canal users use the canal towpath which can be an ideal focus for easy access and exercise. The canal habitat, through both urban and rural areas, supports a wide variety of wildlife. In the urban centres it provides a 'place-making' feature to draw in the public with ready access to outward routes. The Trust's aim is to complete a blue-green corridor of canal through Wiltshire, Swindon and Oxfordshire as a thriving socio-environmental asset.

The value of the restoration has been evaluated as follows for the completed canal:

- £54 million pa GVA from increased economic activity
- £38.5 million pa of NHS savings due to increased activity
- £100 million pa from improved mental health and wellbeing
- £45.5 million remuneration for the restoration's local workforce
- 1,896 natural habitats or principal importance across 750 acres
- 39,500 volunteer hours pa

For Swindon this means:

- £16.5 million pa GVA from economic activity
- 166 permanent jobs
- 360 construction jobs
- 14.4 miles of towpaths - green and blue spaces for leisure
- 15 to 20% increase in housing value on developments next to the canal
- £2 million potential council tax increase

The restoration programme is driven strongly by access to the land, control of which was lost at the formal closure of the canal in 1914. Many restoration projects have already been completed and others are in the planning and development stages. The Trust is working with developers, landowners and other partners to extend the lengths of canal which are in use and to connect them together. Within Swindon the showpiece development is the new Canalside district centre in Wichelstowe, which is an exemplar of restoration at its best and where canal restoration has been sponsored by the Borough Council. When completed, the length of canal in Wichelstowe built as a part of the development project will total 3.2km. The Trust's current 5 Year Business Plan supports the objective of linking Swindon to Royal Wootton Bassett with a navigable route and further work on extending the restored canal in Swindon.

Without the existing policies for protecting the canal route restoration of the canal would not have achieved anywhere near the success that it has. It is the starting point for negotiation with every development close to the route that may have adverse consequences or potential benefits for the canal. Experience of the application of Policy EN11, however, has shown mixed results. This submission builds on that reality.



3 Policy SD9: Heritage Transport

3.1 Comparison to Current Policy

This policy, as worded, is significantly different to the equivalent policy in the 2026 Local Plan, Policy EN11, and the policy drafted for the 2021 consultation on the aborted 2036 Local Plan. The Trust has gained much experience from the operation of Policy EN11 and from other policies with a similar intent in adjacent local authorities. The comments here build on that experience with the aim of ensuring clear and consistent interpretation of the policy by all readers.

3.2 Paragraph 1

The word “indicative” to describe the canal route in the current policy is replaced by “defined”. It has been widely agreed with the Council’s officers that the route shown is indicative and it is labelled as such on the Policies Map. Modifications to the route are accepted where substantiated by design work and, often, agreed with developers in line with the wording of Paragraph 1b). For example, in Eastern Villages a substantially revised route has been agreed and embedded in the outline planning consents for Lotmead and Foxbridge South villages; further South the route has been modified to avoid harm to newly discovered Roman archaeology. Not referring to the canal route as “indicative” in Policy SD9 could mislead readers.

Proposal - Change ‘defined’ to ‘shown indicatively’ in the text of the policy.

Paragraph 1 provides the core safeguarding as “*safeguarded to maintain the possibility of the long-term re-establishment of the Wilts & Berks Canal and North Wilts Canal as navigable waterways.*” Sub-paras a) and b) then distinguish between existing stretches of canal which are not to be harmed by development and aspirational stretches to be protected from development unless an alternative alignment is proposed. This distinction is not well-defined. The aspirational restoration programme includes both the original route and diversions where necessary and, in practice, the junctions between the two may vary slightly as schemes come forward.

The two are not distinguishable on the Policies Map. Only the proposed restoration route is shown while the lengths which might be protected as heritage only appear if identified on the underlying OS mapping.

If there is a distinction to be shown it is between the historic lengths which should be protected for their heritage value and the proposed restoration route, including both original and new lengths, which should receive the fullest protection against adverse development.

The wording of Policy EN11 in the 2026 Local Plan manages this better by safeguarding all of the original canal route and the new diversions and stating “*Proposals will be permitted..... that are designed to develop the canal’s recreational and nature conservation potential, in particular, the use of the old line of the canal for walking, cycling and interpretation.*” This makes it clear that safeguarding heritage is



an important purpose of the policy in addition to safeguarding restoration of a navigable canal.

In sub-paragraph 1a) the absolute protection against harm is good but could be seen to prevent necessary restoration work of the navigable canal which might require, for example, a crumbling lock or weak and narrow road bridge to be demolished and completely rebuilt. An allowance for such exceptional circumstances needs to be included in the policy.

In interpreting sub-paragraph 1b) it is assumed that the last phrase contains a typographical error and it should be read as “unless an effective alternative alignment is proposed.” instead of “unless affected alternative alignment is proposed.”

“An effective alternative alignment” must mean one that is deliverable, i.e. it can be built and operated under reasonable conditions and at a realistic cost, otherwise the safeguarding is valueless. A factor, therefore, in the assessment of an alignment is the width of the corridor required to build the canal with its associated structures etc. The canal was often built in very restricted space. Modern design, accessibility and safety standards, and particularly the introduction of wider, safer, towpaths for use by pedestrians and cyclists, may require widening of the existing canal boundaries. The physical extent of safeguarding is a consideration for all lengths of the proposed restoration route.

Proposal - Revise Paragraph 1 to address the above issues by redrafting as:

- 2 Existing and aspirational canal alignments, as shown indicatively on the Policies Map, shall be safeguarded to retain the possibility of the long-term re-establishment of the Wilts & Berks Canal and North Wilts Canal as navigable waterways. This will be achieved by ensuring:
 - c) that the integrity of existing stretches of canal (and its remaining associated structures) are not harmed by development proposals except where works are essential to enable the restoration of the canal for navigation; and
 - d) that stretches proposed for restoration, including existing and new stretches, are protected from development (including infrastructure), unless an effective alternative alignment is proposed.

Existing stretches of the old line of the canal and its infrastructure that are not required for future navigation shall be safeguarded as heritage. Proposals will be considered that are designed to develop the canal’s recreational and nature conservation potential; in particular, the use of the old line of the canal for walking, cycling and interpretation.

3.3 Paragraph 2

This paragraph says that proposals for restoration will be permitted subject to criteria in sub-para 2.a) which are that land necessary for the proper functioning of the canal and associated development, including land needed for maintenance, is secured for these purposes.



The purpose of this paragraph would seem to be to ensure that restoration schemes coming forward will form part of a coherent restoration programme and not a white elephant for lack of ability to complete the overall project. The Trust is equally concerned that its efforts are not wasted and its charitable funding is used appropriately. Therefore, the Trust's work in preparing designs and planning applications for sections of the project is conditioned on the project being demonstrably viable in the longer term, appropriately set in the context of the overall restoration programme and timely in the sequence of the proposed development.

The complete restoration project is over 110km long and is planned in a 25 years plus programme. It is being constructed in many individual and distinct projects often with their own planning consents to help define them. Even within Swindon Borough there is 25.4 km of protected route to be constructed in many phases over the same timeframe. While the total completion of a navigable route from end to end is the aim there will be interim periods when sections of the canal are partially completed and/or operated independently.

It is clearly impractical to define exactly the land to be secured for the whole canal or even the Swindon length at the stage when a planning application is made for one section if 'secured' is interpreted as ownership or long lease on the land. The Trust did identify in response to the 2023 Call for Sites the likely land requirement according to best available information. Access to this land will be acquired over a long timeframe.

Proposal - Revise Sub-para 2.a) to read:

- a) ensure land necessary to the proper function of the canal and associated development in the vicinity of the application site such as footpaths, bridges, locks, ponds, basins, including land needed for maintenance, is identified for these purposes.

The criteria in Sub-paragraph 2.b) for full assessment of environmental impacts and mitigation measures is consistent with normal practice for planning applications. The Trust's aim to restore the canal is to create an improved green and blue corridor containing the navigation channel, so meeting this criterion is core to any planning application for restoration works. A foundation for the Trust's environmental component of its restoration schemes is the biodiversity mapping and building of environmental records for the green and blue corridor.

Each restoration project will be designed to enhance biodiversity in an appropriate way.

Proposal – No change to Sub-para 2.b)

Policy SD9: Local Heritage is supported by Paragraphs 5.13 and 5.14 in the accompanying text. The commentary in these paragraphs recognises that the Wilts & Berks Canal has already been partially restored in the Borough and there is a strong move to restore further sections although parts of the route in the urban area have



been obliterated and diversion routes have been developed in order to complete restoration of a navigable route between the three connection points to the rest of the national network at Semington, Cricklade and Abingdon.

4 The Protected Route on the Policies Map

The Policies Map shows the proposed restoration routes for the Wilts & Berks Canal and the North Wilts Canal. It does not distinguish between existing stretches and aspirational stretches. The Map does not show existing stretches which will not be used for restoration but safeguarded unless they are present in the underlying OS mapping. The line width is not significant to its interpretation but it may appear to be so when zoomed in. The use of a single colour for fill and the boundary line could reduce the risk of misinterpretation.

The route shown is the same as shown on the Policies Map of the 2026 Local Plan. The route shown is indicative and is being refined over time in response to, for example; detailed design development, adjustment to new adjacent developments, agreements with developers or landowners and changing regulation. In 2023 the Trust was requested to respond to a call for new sites by providing the best available estimate of the route and land required for the canal. This was submitted in March 2023 with maps and a revised canal centreline in a format for integration with the GIS mapping. The same canal centreline is proposed with this response because there has been no change since 2023.

The revised route incorporates the changes since the 2026 Local Plan was adopted in 2015. A summary of the main changes is given here. Fuller details and explanations are provided in the 2023 submission Land for the Canal in Swindon – A Response to the Call for Sites.

The proposed route is shown in Figure 2: The Canal Route in Swindon and the following notes refer to the named sections and updates to the route.

1) Hay Lane to M4

The middle of this section was adjusted in the design studies for the M4 Crossing.

2) Wichelstowe

This route is fixed by the planning consents for the development

3) South Swindon Bypass

The length near Hodson Lane has been adjusted to improve farm access and the road bridge location.

4) East Swindon Bypass

This section has been subject to large adjustments caused by the introduction of the Southern Connector Road close by, the discovery of important Roman remains on the previous line and agreements with the developers for Foxbridge South and Lotmead Villages which have settled the route within their planning consents.



5) Kingshill to Wharf Green and Town Centre

These are the most difficult sections for restoration of the whole canal and yet they are vital to the overall project aim of completing links with the rest of the UK's canal network. A fuller explanation of the situation and proposals is included in Appendix 1 which is an extract from the submission in January 2020 to the aborted Local Plan 2036.

Within this section there are two distinct lengths of the canal route to be safeguarded:

- A. The eastern part of the route between Kingshill Road and the Central Area. This is shown on the Local Plan 2026 Policies Map. Studies in the 2000s resulted in the Council and Trust preferring a diversion of the route from Kingshill along Faringdon Road and Fleet Street and then a link north to the crossing under the railway. It has become apparent that the route through those streets will never be achievable due to local traffic needs and it is unacceptable to other heritage interests in the area. Since 2021 the Trust has therefore proposed reverting to restoring the original line to get to Wharf Green or as close as possible. This change is shown in the revised mapping presented to the 2023 Call for Sites.
- B. Between Wharf Green and the railway crossing where the connection between length A and the railway crossing is yet to be resolved. The original canal route has been obliterated by development although recognised in place names and local markers. The pattern of ownerships and uses is complex while much of it is ripe for redevelopment; necessary to fulfil the Swindon Vision. Creation of a new route for the canal remains a long-term objective which will need close consideration in proposals for wider development of the area. Hence it remains as an undefined link in the Trust's draft alignment. The recent heritage restoration and improvement works in the Railway Village area recognise the canal route and do not contravene its development.

6) North Star and Great Western Way to Rodbourne

The centreline has been adjusted very slightly while developing a scheme which relates more closely to development proposals by others for North Star and the Oasis.

7) Great Western Way to Moredon

The canal route is shown following its original line but the eastern part the original route is now claimed by the industrial estate roads making it impossible to follow. Studies since 2015 have focused on at least some of the southeastern part of the route being diverted to run between the industrial buildings and the railway where it is shown on the revised plan.

8) East of Purton Road and Mouldon Hill

No change.



Proposal - Substitute the updated map of the canal alignment into the Policies Map and indicate it by using a single colour for outline and fill.

5 Further Comments

The Trust makes the following representations on other Chapters of the Draft Local Plan.

5.1 Chapter 2 Our Vision and Objectives

The canal supports many of the themes in the Local Plan's Vision of a Fairer, Greener, Better Swindon. Although the canal is not mentioned in the draft text the benefits of the canal restoration as summarised above clearly will contribute to achieving the Local Plan's Vision. The Trust's vision, supported by the Wiltshire, Swindon and Oxfordshire Canal Partnership, of a green and blue corridor with much improved environmental status and providing so many benefits to the community gels with so much of the Local Plan's Vision.

In particular, it will contribute to these Strategic Objectives:

- SO1 – Regenerating Swindon Town Centre
- SO2 – Place and Belonging
- SO5 – Connected Communities and Sustainable
- SO7 - Health and Wellbeing

5.2 Chapter 4: The Spatial Strategy & Strategic Area Policies

Safeguarding the canal route is specifically included only in the Strategic Area Policy 02 for New Eastern Villages, although it is also embedded in Wichelstowe (SGL 04) by the existing planning conditions. It is not specifically mentioned in Policy SGL 01 Swindon's Central Area although the route is shown to pass through it. Protection of the canal route and eventual restoration here will add enormously to the placemaking appeal with the canal corridor and perhaps small public spaces such as pocket parks nearby. It will contribute strongly to the knitting together of green infrastructure in the town as well as responding positively to the heritage environment.

Within Swindon's Central Area there are three distinct lengths of the canal route to be safeguarded:

- A. The eastern part of the route between Kingshill Road and the Central Area. This is shown on the Local Plan 2026 Policies Map. Studies in the 2000s resulted in the Council and Trust preferring a diversion of the route from Kingshill along Faringdon Road and Fleet Street and then a link north to the crossing under the railway. It has become apparent that the route through those streets will never be achievable due to local traffic needs and it is unacceptable to other heritage interests in the area. Since 2021 the Trust has therefore proposed reverting to restoring the original line to get to Wharf Green or as close as possible. This change is shown in the revised mapping presented to the 2023 Call for Sites, and also in Appendix 1.



- B. Between Wharf Green and the railway crossing where the connection between the lengths A and C is yet to be resolved. The original canal route has been obliterated by development although recognised in place names and local markers. The pattern of ownerships and uses is complex while much of it is ripe for redevelopment; necessary to fulfil the Swindon Vision. Creation of a new route for the canal remains a long-term objective which will need close consideration in proposals for wider development of the area. Hence it remains as an undefined link in the Trust's draft alignment. The recent heritage restoration and improvement work in the Railway Village area recognise the canal route and do not contravene its development.
- C. Between the railway crossing and Great Western Way where the route is defined on the policies map alongside the Oasis developments.

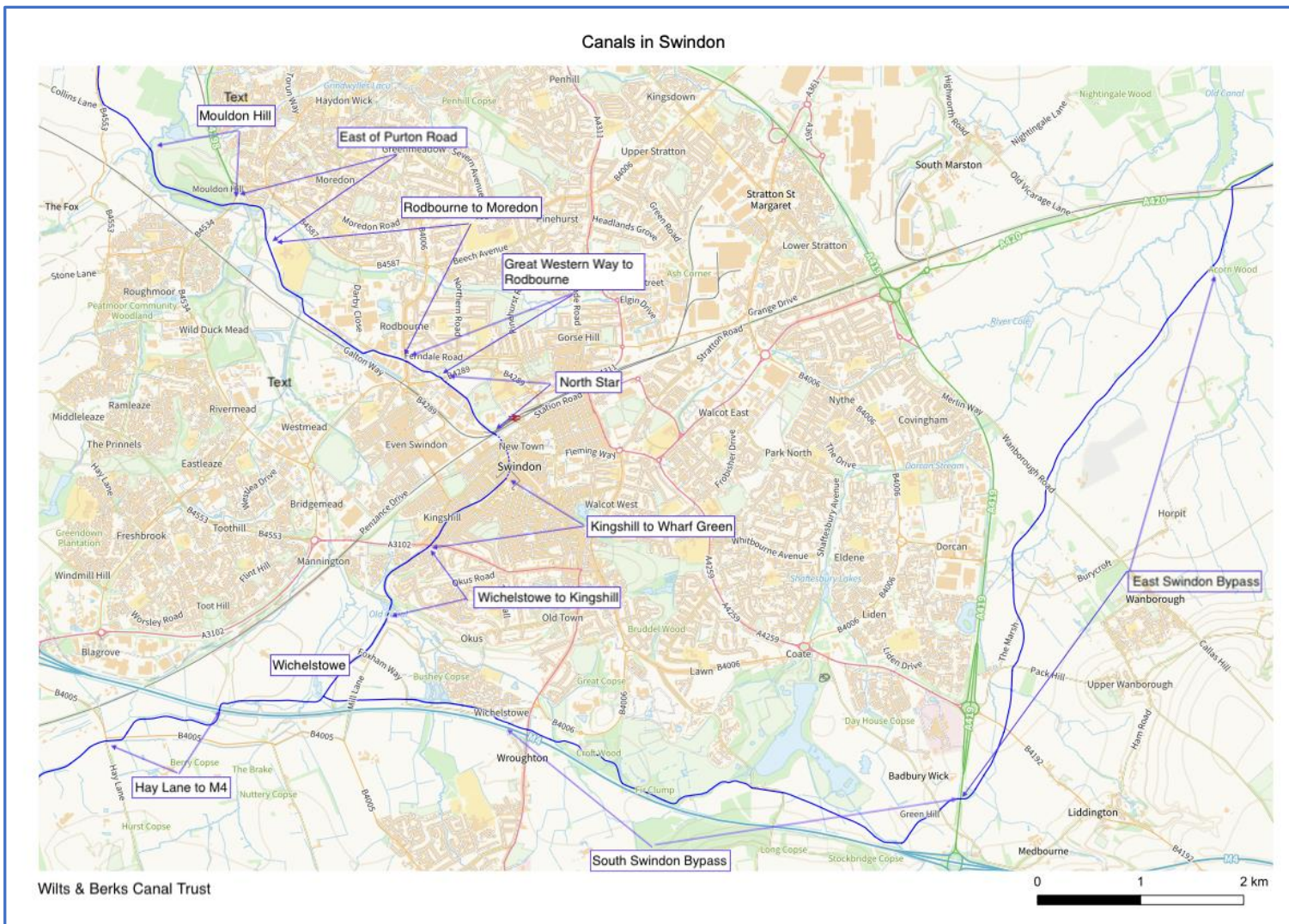
The Trust does not underestimate the difficulty of co-ordinating redevelopment in the central area and creating a suitable route for the canal but notes the expectation for major development to come forward with co-ordinated schemes. The Trust is very ready to support such developments and assist with comprehensive masterplanning.

The theme of connectivity runs through much of both the Vision for the town and the spatial policies. Green connectivity is both a benefit for ecology and for usage of the green areas by the community. The canal route is itself green and blue but also provides connectivity between so many other green spaces in the Borough. This is illustrated in Figure 3: The Canal Connecting Green Spaces.

Proposal - Add to the list of key place objectives in SGL 01 Swindon's Central Area paragraph 3:

i). Restoration of the Wilts & Berks Canal:

The long term restoration of the Wilts & Berks Canal as a navigable waterway will contribute to vitality of the area, respect the heritage, and provide a green and blue corridor for placemaking and improving general wellbeing.



Page No 13

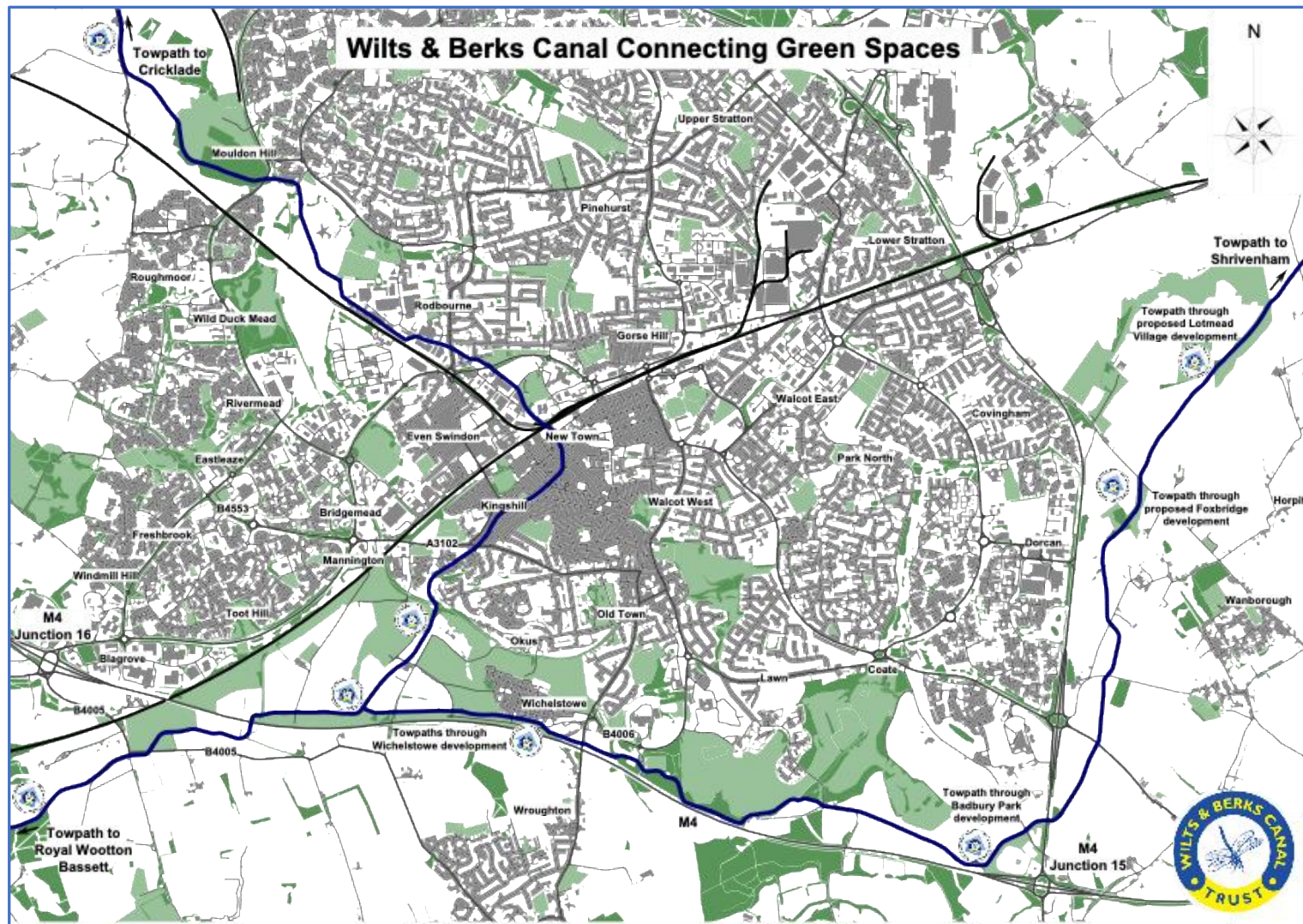


Figure 3: The Canal Connecting Green Spaces



APPENDICES

Appendix 1 - The Town Centre Route – An Extract from the Response to the Swindon Borough Council Local Plan 2036 Submission Draft in January 2020

5 The Indicative Protected Route on the Local Plan Map

5.1 The Importance of Continuity

The purpose of the restoration project is to restore a complete corridor including navigation to the whole route from end to end with links to other waterways. When completed, the restored corridors will complete links to the River Thames, River Severn via the Cotswold Canals, and the Kennet and Avon Canal. These form impressive and attractive new leisure routes and spaces enabling circular travel paths for walkers, cyclists and boaters of all types. All set in an improved environmental corridor wherever possible. Such circular routes are highly prized by their users as can be seen from their popularity in central and northern England.

The two circular routes can be seen in the map below. The links to the Rivers Severn and Thames open up connections to the national canal network, allowing passage of boats throughout the country. Swindon town centre is at the heart of the Wilts & Berks Canal and the southern canals network. It is well-recorded that Swindon became a railway town because of the presence of the canal which was used to bring in materials for Brunel's works. There is every reason to restore as much as possible of this historic feature without which Swindon would not exist as it does now.

The southern and eastern bypass of the town centre provides the necessary continuity for the southern circular route. The northern circular route would be broken if the existing section of the main line at Westleaze is not extended northwards through the town centre towards Cricklade and the Cotswold Canals.



The Southern Waterway Rings which centre on the Wilts & Berks Canal in Swindon

The benefits of these connections are not solely for the Wilt & Berks Canal. Many millions of pounds are being spent on restoring the Cotswolds Canals with great successes recorded already. Since the restoration of the Kennet and Avon Canal over 20 years ago it has become hugely popular and enabled economic growth along its length. The connection through Swindon will enable and encourage towpath users and boaters along neighbouring canals and the River Thames, encouraging greater use of all the linked waterways for leisure, off-road travel and the associated biodiversity schemes and commercial developments where appropriate.

5.2 The Town Centre Connection

5.2.1 Route Studies

The original route of the main line is still to be seen clearly through the town centre. It follows from Kingshill to the town centre along the path and cycleway under existing bridges to Wharf Green, along Canal Walk, along Fleming Way to the Magic Roundabout, and then continues along a footpath to the east towards Greenbridge. The North Wilts branch can be traced from John Street to under the railway lines at the existing cycle path crossing although much of the intervening section has been obscured by office buildings. Through North Star, crossing Great Western Way near where the gas holder used to stand, it can be seen again in the green space leading to Rodbourne Road before it enters Cheney Manor industrial estate along the line of Derby Close. Continuing northwest it runs through green space again before crossing under Thamesdown Drive in a newly-built culvert and then through Mouldon Hill Country Park to the borough boundary at the restored River Ray aqueduct. Further on it leads through rural land to Cricklade and a connection with the Thames & Severn Canal.

The foundation for the restoration scheme is the report Feasibility Study for the Restoration of the Wilts & Berk Canal by Scott Wilson Kirkpatrick in 1998 which superseded earlier reports



and considered the whole route. More detailed studies have since been commissioned for certain sections, notably:

- Report into the Preferred Route for the Reinstatement of the Canal Around Swindon, April 2003, DPDS for WBCT
- Pre-feasibility Study for the Canal in Swindon, July 2003, by Ove Arup for the New Swindon Company
- Swindon Central Canal Route Study, August 2007, by Halcrow Group Ltd for Swindon Borough Council

Whilst some of the detail in these reports may now be out of date the principles still apply and the restoration programme follows through.

It has to be accepted that parts of this route in the urban area cannot be restored in a short timeframe and without major demolition works. But parts of the route are accessible and parts are in areas badly in need of redevelopment and may therefore be achievable in a reasonable timeframe. How to join these together has been the theme of feasibility studies, particularly the central section, from what is now Wichelstowe to Mouldon Hill. Since the 1990s many route options and combinations have been assessed from the Hay Lane / Wharf Road junction area to Mouldon Hill. The 1998 Scott Wilson Kirkpatrick report settled on a new line following approximately the River Ray to the west of the town centre. The 2003 Report into the Preferred Route for the Reinstatement of the Canal Around Swindon of April 2003 by DPDS explored this route more thoroughly and recommended it. However, this route also presented many difficulties and was eventually abandoned due to the advance of conflicting developments and the impact on the River Ray.

In the same year New Swindon Company commissioned a feasibility report from Arup on options for the route including following the old line from Kingshill to Wharf Green with a branch off northwards to eventually reach the railway crossing. The study concluded:

“The study shows that none of the options through central Swindon meet the criteria for inclusion in the new town centre masterplan. However, a link to a new basin at Wharf Green may prove to be viable. It would be desirable that the masterplan for the Wharf Green area does not preclude the possibility of a future canal link to Wharf Green.”

This conclusion was reached on the grounds that the canal was not deliverable within ten years as required by the study brief and was not financially attractive to developers. The report also recommended that the route protection in the Local Plan 2011 be extended on the original line to Farnsby Street to retain the possibility of incremental development to reach Wharf Green in conjunction with future development there.

The Swindon Central Canal Route Study was carried out for Swindon Borough Council in 2007 by Halcrow Group Ltd. This study proposed a route which diverged from the original line closer to Kingshill than the previous study and required the closure of more roads. It



concluded that many of the direct benefits to the town are centred around the creation of a feature and sense of place for the town centre. There would be direct redevelopment opportunities around the proposed basin area near John Street but the canal would also act as a catalyst for private redevelopment along its whole route in addition to the reduction of flood risk from surface water along the route.

Both studies concluded that, whilst feasible, there are a significant number of difficulties that would need to be overcome in each case. In particular, major service diversions and significant changes to the road transport network around the route and the wider borough would be necessary to accommodate the canal. Some properties would need to be acquired. The proposed routes are shown in Figures 1 and 2.

5.2.2 Present status

The route proposed in 2007 was adopted as the indicative route in the Local Plan 2026. This route crosses under Kingshill road and then turns north before following Westcott Place, Faringdon Road and Fleet Street to a small basin near John Street. From there the canal resumes northwards to the railway crossing. See Figure 2. It is designed to avoid disruption to the existing pedestrian shopping area and to maximise the benefits as a place-maker for enhancing the town centre. This route has the obvious disadvantage that traffic diversions are necessary and several locks will be required to keep the water level just below the existing road levels and pass under Kingshill.

There has been no progress towards constructing any part of the route but neither have there been other developments along the route which make it any less viable. The planning consent for the new bus station at the end of Fleming Way does conflict with the canal route. The trust has tried to engage with the evolving town centre planning for the area but with no tangible success. Developments have been coming forward piecemeal without the vision needed for a comprehensive scheme to embrace the canal. The trust has, without any success yet, pursued the objective by introducing to the council funding partners prepared to invest in supportive development schemes.

Two adverse issues have been identified more recently. First, there has been no progress towards diverting traffic away from the affected streets and that seems unlikely to happen. Second, the opposition to the scheme from other heritage organisations has become more evident: the route close to the railway village, Faringdon Park and adjacent heritage buildings is deemed unacceptable by some because it does not fit with restoration to the original street setting as they desire.

The new Heritage Action Zone is a focus for coordinated improvement of the area in which the canal trust wishes to play a part. The boundaries of the zone are still subject to final definition but for the canal to connect across the railway line it will certainly have to cross through this zone as it did originally.

The benefit from improving the western access to the town centre is still a valid objective. The present approach by foot and cycle along the old canal route, despite a few trees and



some grass, is still disjointed and depressing. Most of the benefits of bringing a waterway back into the town as discussed above can still be had with a canal scheme.

5.2.3 Revised Route Proposal

Whilst retaining the long-term objective of connecting Kingshill to Mouldon Hill and Cricklade, the trust has examined the partial solution of reverting to a scheme outlined in the New Swindon Company report by Arup which would restore the line as close to Wharf Green as possible with a small turning basin near that end. Without the need to demolish the Brunel West car park, the canal could lead right up to the square and support the positive ambience that it so badly needs. The route from Kingshill to Farnsby Street is open and some of the road bridges over it are still in use. The main difficulties are crossing under Kingshill road at its junction with Sunnyside Avenue and the number of large utility services now occupying the corridor. However, It would be an opportunity to upgrade what is now a quite depressing western approach to the town centre.

A connection to the railway line crossing is still essential but would be a longer-term development as and when the buildings in the area are replaced and could spur off the restored line at a convenient point. The Arup report suggested a spur along Maxwell Street to Faringdon Road but a route further east and crossing over Faringdon Road/ Fleet Street would be preferable in many ways.

The area of the town centre between Canal Walk and the railway (outside of the railway village area) has an obvious potential for redevelopment. Much of it is in poor condition and under-utilised. In response to the pressures in Swindon, as there are on many similar town centre retail areas, the town centre retail zone may be shrunk thereby encouraging redevelopment of this area. The possibilities of carrying the canal line through this area can be expected to increase.

The trust proposes that the protected line from Kingshill be changed to follow the original route as far as Wharf Green. Further work is required to establish a firm route from Wharf Green, or near there, to the railway line crossing. The final choice may depend on appropriate redevelopment schemes coming forward. This section of the route should be annotated as indicative with a very 'broad brush' indication on the local plan map. See Figure 3 where this is indicated by the broken line.

5.2.4 Conclusion on Town Centre Route

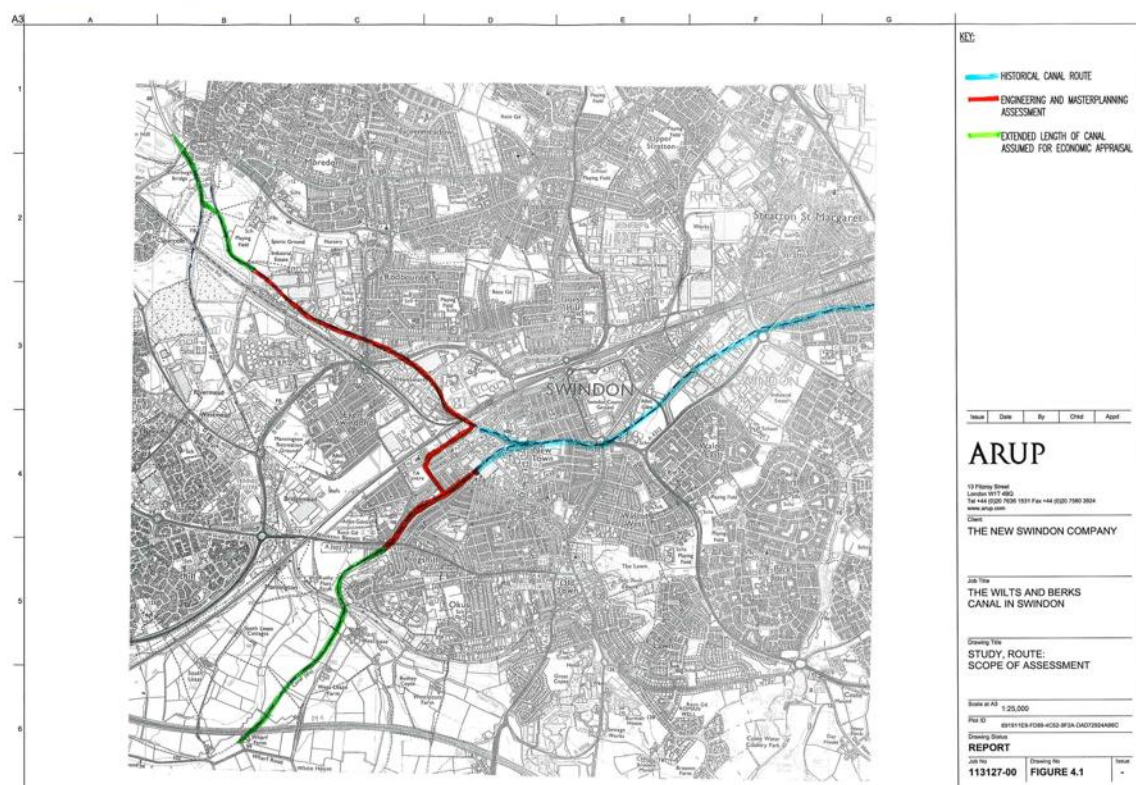
The creation of the town centre route is a longer-term objective which needs other changes in the town centre to enable its delivery. However, it is an essential phase of the long-term project to recreate the Wilts & Berks Canal and its connection to other waterways forming the southern canals network; a project with a history of over 30 years. From a technical perspective the deliverability has been demonstrated by two feasibility studies.

The trust proposes that the route to Wharf Green along the original route should be added to the indicative plan in place of the present route. The indicative route from near Wharf

Green to the railway crossing may need to be described as under review pending identification of any proposed changes and further studies.

The trust proposes that north of the railway line the indicative route should remain unchanged.

Figure 1 Central Route Plans
New Swindon Company Study, 2003 – Map of Engineering and Masterplanning Assessment







Respondent No: 359

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[REDACTED]

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- Q1. Title Mr
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- Q3. Last Name Rathod
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- Q5. Organisation (where relevant) DPDS Consulting Group on behalf of Fairwater Ltd

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

SBC admin note: Please see attached response. We feel that an opportunity has been missed to add an element of flexibility to emerging Local Plan Policy SD6: Villages and Development in the Countryside. The policy could be expanded to encourage small residential sites to come forward in areas of 'countryside' where there is an established cluster or pattern of development, and new proposals would have the opportunity to infill or round-off such areas of development. Such small sites are important for keeping the housing land supply topped up and reducing reliance on strategic allocations. Indeed, the NPPF acknowledges that small and medium sites can be built out relatively quickly.

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.

Similar flexible development plan policies in the nearby authorities of West Berkshire (Local Plan Review Policy DM1: Residential Development in the Countryside) and Basingstoke and Deane (Local Plan Policy SS6: New Housing in the Countryside) have been successfully adopted, and we would encourage Swindon Borough Council to consider the benefits of adopting a similar approach to small sites in the countryside. This is discussed in further site-specific detail in the accompanying covering letter dated 3rd October 2025.



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

SBC admin note: Please see attached response. The 'Settlements and Settlement Boundaries Topic Paper', which has been published as part of this Regulation 18 Consultation, acknowledges at Principle 2 that "Settlement boundaries need not be continuous and can potentially form two or more separate elements".

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.

Principle 2 must be applied to the settlement of Wanborough, which is made up of three distinct areas: Upper Wanborough, Lower Wanborough and The Marsh/Burycroft. This is discussed in further site-specific detail in the accompanying covering letter dated 3rd October 2025.



Respondent No: 361

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

SBC admin note: Please see attached response. Please refer to the accompanying covering letter dated 3rd October 2025 for site-specific comments on the SHELAA relating to sites s0526, s0462, s0463, s0464, s0461, s0494 and s0457.

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

Please refer to the accompanying covering letter dated 3rd October 2025 for site-specific suggested changes to the SHELAA relating to sites s0526, s0462, s0463, s0464, s0461, s0494 and s0457.

Our Ref: VR/ED/C12488

Your Ref:

Date: 3rd October 2025



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

By Email: SwindonLocalPlan2043@swindon.gov.uk

Dear Sirs,

Response to Swindon Borough Council 'Call for Sites' and Regulation 18 Consultation of the emerging Swindon Local Plan 2023-2043

DPDS Consulting Group ('DPDS') has been instructed by Fairwater Ltd ('the client') to prepare and submit representations in response to Swindon Borough Council's 'Call for Sites' and Regulation 18 Consultation of the emerging Swindon Local Plan 2023-2043 which commenced on 1st September 2025.

This representation relates to and provides an update on five sites which the client has an interest in and have been assessed in the Strategic Housing and Economic Land Availability Assessment (SHELAA) 2025 which was published as part of the Regulation 18 Consultation.

The five sites are:

- Land at Redcliffe Street (SHELAA ref. s0526)
- Land rear of 24-32 Shrivenham Road (SHELAA ref. s0462)
- Land and Barrowby Gate and to the rear of Highworth Road (Site A) and (Site B) (SHELAA ref. s0463 and s0464)
- Land north of The Marsh, Wanborough (SHELAA ref. s0461) with potential to combine with adjacent site Land at Honeyfield Alpacas (SHELAA ref. s0494)
- Land to the East of 58 Church Road and North of 44 Church Road, Wanborough (SHELAA ref. s0457)

A completed 'Call for Sites' form and updated Location Plan for four of these sites is enclosed. For Land at Barrowby Gate (s0463/s0464) a written update is provided in this representation letter.

We will now provide an update and discuss the opportunities for each site in further detail below.

Land at Redcliffe Street (SHELAA ref. s0526)

This site is located within the built-up area of Swindon, close to the town centre and Swindon Designer Outlet. The emerging Policies Map accordingly identifies the southern part of the site as falling within a

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Planning Policy Team
Swindon Borough Council

‘Sustainable Growth Area’ which is welcomed. The site is also identified as forming part of a ‘GI (Green Infrastructure) Corridor’.

As per the enclosed Location Plan, the site area has been increased by combining the site with adjacent land parcels (now 3.03ha in total). This significantly increases the opportunities for the site and allows for a planned approach which takes account of the existing site context to unlock much needed town centre housing and associated access (including affordable housing in accordance with emerging Local Plan Policy HC2: Affordable Housing) as well as enhancements to pedestrian connectivity and provision of open space/multifunctional green infrastructure (in accordance with emerging Local Plan Policy CSE3: Green Infrastructure in New Developments). A quantum of 30-50 dwellings is considered suitable and achievable given the sustainable location and the potential for the development to be delivered across the site in a mix of dwelling types and heights, reflecting existing development on Redcliffe Street. This would result in an effective use of land within a built-up area which is encouraged by the National Planning Policy Framework (NPPF) and would be in accordance with the emerging Local Plan Strategic Policy SP1: Sustainable Development and Policy SD1: Effective Use of Land.

The latest SHELAA mentions *“Flood risk present on a large portion of the otherwise small size”* and *“Access an issue”*, however in our view both issues can be addressed. First, the promoter has commissioned PFA Consulting to design an access suitable for a limited scale residential development such as that provided that meets current highway design and safety standards. Second, the whole site has been the subject of detailed topographical survey and the flood risk situation modelled by PFA Consulting to take into account both climate change factors and additional flows likely to be generated by development. It is understood that the Environment Agency flood risk mapping is based on historic flood records or digital assessments as opposed to topographical survey. The drainage environment has also changed significantly in the wider area as a result of the Wichelstowe town expansion development. Although this development area still has some years to go before the planned and permitted development is completed, it has progressively introduced a wide range of changes to the drainage regime as development progresses to the point where, on completion, the SuDS features introduced by the developer will mean that the surface water run-off from the completed development into the River Ray will be considerably less on completion than was the case in 2004 when outline planning permission was granted. Although the drainage environment of the subject site needs to be the subject of further detailed study and modelling, the developer believes that residential development on this sustainably located site is feasible.

Land rear of 24-32 Shrivenham Road (SHELAA ref. s0462)

This site is located within the built-up area of Swindon, close to the town centre. The emerging Policies Map accordingly identifies the site as falling within a ‘Sustainable Growth Area’ which is welcomed.

As per the enclosed Location Plan, the site area has been increased by combining the site with adjacent land parcels to include land rear of 10-32 Shrivenham Road and land rear of 48 Shrivenham Road. The total site area is now 0.36ha. This significantly increases the opportunities for the site and allows for a planned approach to unlock much needed town centre housing (including affordable housing in accordance with emerging Local Plan Policy HC2: Affordable Housing) together with associated access infrastructure.

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Planning Policy Team
Swindon Borough Council

A quantum of 20-25 dwellings is considered suitable and achievable given the sustainable location and higher density pattern of terraced development at the adjacent Pavilion Close development which provides an established character. This would result in an effective use of land within a built-up area which is encouraged by the NPPF and would be in accordance with the emerging Local Plan Strategic Policy SP1 (Sustainable Development) and Policy SD1 (Effective Use of Land).

The latest SHELAA mentions *“concerns relating to landscape”* and *“access potentially an issue”*, however in our view the land assembly allows for a comprehensive approach to landscaping which can be secured through the development management process. It should also be highlighted that the client controls the access to the assembled site and therefore delivery can be guaranteed.

Land at Barrowby Gate and to the rear of Highworth Road (Site A) and (Site B) (SHELAA ref. s0463 and s0464)

This site is located within the Stratton St Margaret built-up area of Swindon.

At the time of this submission, part of the site has planning permission for 8no. detached dwellings and has been built out (planning application ref. S/22/1090 and S/22/1123). The remainder of the site is vacant and a planning application for residential development of a similar scale and character to its surroundings will be submitted shortly. This would result in an effective use of land within a built-up area which is encouraged by the NPPF and would be in accordance with the emerging Local Plan Strategic Policy SP1 (Sustainable Development) and Policy SD1 (Effective Use of Land).

The latest SHELAA refers to *“Accessibility issues likely in reality due to development parcel being off a series of cul-de-sacs”*, however this is very much the established residential character of the area, so the proposed development would be complementing this. It should also be highlighted that the client controls the access to the assembled site and therefore delivery can be guaranteed.

Land north of The Marsh, Wanborough (SHELAA ref. s0461) with potential to combine with adjacent site Land at Honeyfield Alpacas (SHELAA ref. s0494)

This site is located north of The Marsh, which forms part of the route connecting the village of Wanborough with Commonhead to the southwest. To the north of the site is the New Eastern Villages (NEV) strategic allocation. Consequently, the site falls within a designated ‘Area of Non-Coalescence’ (ANC) which has the aim of protecting the character and identity of Wanborough with the forthcoming NEV.

Notwithstanding this designation, we feel that there is an opportunity for the site (SHELAA ref. s0461), in combination with the adjoining site at Honeyfield Alpacas (SHELAA ref. s0494), to be allocated to enable a planned, sustainable level of growth for this part of Wanborough. This would follow the existing character of linear ‘development in depth’ along Burycroft and The Marsh and would not compromise the purpose of the ANC given the relatively modest scale of proposed development at The Marsh compared to that allocated at the NEV. A quantum of 20-25 dwellings across both sites with a combined site area of 3.11ha (see enclosed Location Plan) is considered suitable and achievable.

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An allocation of this size would unlock the potential for delivery of much needed affordable housing (in accordance with emerging Local Plan Policy HC2: Affordable Housing) in Wanborough which is extremely rare, the last such development being at Underdown Close in the 1980s. This would provide opportunities for younger or smaller families, especially those with existing connections to the area, to stay in or relocate to Wanborough rather than being priced out of the market.

The latest SHELAA notes that the site is *“located outside of a current settlement boundary”*. In our view, however, the site is part of the settlement of Wanborough which is identified as a ‘larger village’ in the emerging Local Plan. The ‘Settlements and Settlement Boundaries Topic Paper’, which has been published as part of this Regulation 18 Consultation, acknowledges that *“Settlement boundaries need not be continuous and can potentially form two or more separate elements”*. This clearly applies to Wanborough which is made up of three distinct areas: Upper Wanborough, Lower Wanborough and The Marsh/Burycroft.

Notwithstanding our view regarding the settlement boundary of Wanborough, we also feel that an opportunity has been missed to add an element of flexibility to emerging Local Plan Policy SD6: Villages and Development in the Countryside. The policy could be expanded to encourage small residential sites to come forward in areas of ‘countryside’ where there is an established cluster or pattern of development, and new proposals would have the opportunity to infill or round-off such areas of development. Such small sites are important for keeping the housing land supply topped up and reducing reliance on strategic allocations. Indeed, paragraph 73 of the NPPF acknowledges that small and medium sites can be built out relatively quickly. Similar flexible development plan policies in the nearby authorities of West Berkshire (Local Plan Review Policy DM1: Residential Development in the Countryside) and Basingstoke and Deane (Local Plan Policy SS6: New Housing in the Countryside) have been successfully adopted, and we would encourage Swindon Borough Council to consider the benefits of adopting a similar approach to small sites in the countryside.

With regards to the site at The Marsh, the SHELAA adds that there is *“Significant concern regarding rural location and lack of access to facilities and services by sustainable modes”*. This concern is overstated in our view, as the site is located within close walking distance of bus stops for regular services into Swindon Town Centre as well as Marlborough and Hungerford. In a recent July 2025 planning permission for a new dwelling at 4 College Farm Cottages, Lechlade Road (ref. S/25/0671), Swindon Borough Council concluded that *“The application site has access to sustainable transport since it is on a bus route”*. In this case, the nearest bus stop was *“500-800m north”* in the village of Inglesham. This distance was found to be suitable by the planning officer in the context of paragraph 110 of the NPPF, which states that *“...opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making”*. The subject site at The Marsh, meanwhile, has a bus stop *less than 50m* from the existing site access which, given the precedent set by the above referenced permission, simply cannot equate to any ‘significant concern’ regarding access to facilities and services by sustainable modes.

The SHELAA also notes *“Significant concern regarding heritage and ecology”*. In our view, however, the nature of the proposed site allows for a combination of sensitively designed residential development in

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depth, reflecting that at adjacent St Katherine's Place and Suters Lane, on the southern part of the site and open green space at the northern part of the site.

This would contribute towards maintaining the setting of existing heritage assets (in accordance with emerging Local Plan Policy SD8: Historic Environment), provision of multifunctional green infrastructure (in accordance with emerging Local Plan Policy CSE3: Green Infrastructure in New Developments) and achieving biodiversity net gain (in accordance with emerging Local Plan Policy CSE8: Biodiversity, Geodiversity and Nature Recovery). If any harm was to be found to existing heritage assets as a result of proposed development of this site, in our view this harm would be outweighed by the provision of much needed housing, particularly affordable housing, in this part of Wanborough. The identified constraints should therefore not preclude the potential for allocating or developing this site for residential development.

Land to the East of 58 Church Road and North of 44 Church Road, Wanborough (SHELAA ref. s0457)

This site is located in Upper Wanborough and accessed off Church Road, similar to 58 Church Road which is located to the west of the site.

As per the enclosed Location Plan, the site has been extended to include all land within the client's ownership and the land parcel to the north, increasing the total site area to 1.19ha. This in turn results in more opportunities for a residential development which can be sensitively designed to take into account the character and appearance of the Upper Wanborough Conservation Area (in accordance with emerging Local Plan Policy SD8: Historic Environment) while also providing open space and green infrastructure (in accordance with emerging Local Plan Policy CSE3: Green Infrastructure in New Developments). The recently constructed thatched cottage at 52 Church Road (planning permission ref. S/13/0920) provides a positive precedent for the type of high-quality new development which can be achieved here.

A quantum of 10-15 dwellings is considered suitable and achievable for this site and would unlock the potential for delivering much needed affordable housing for Wanborough (in accordance with emerging Local Plan Policy HC2: Affordable Housing). This would allow younger or smaller families, especially those with existing connections to the area, to stay in or relocate to Wanborough rather than being priced out of the market.

The latest SHELAA notes that the site is *"located outside of a current settlement boundary"*. To this, we have the same response as that discussed above regarding the site at The Marsh.

The SHELAA repeats that there is *"Significant concern regarding rural location and lack of access to facilities and services by sustainable modes"*. Again, this concern is overstated in our view, as the site is located within close walking distance of bus stops for regular services into Swindon Town Centre as well as Marlborough and Hungerford. As discussed above regarding the site at The Marsh, a July 2025 planning permission for a new dwelling at Lechlade Road (ref. S/25/0671) assessed the nearest bus stop distance of 500-800m in the context of paragraph 110 of the NPPF, which recognises that opportunities to maximise sustainable transport solutions will vary between urban and rural areas. With this precedent in mind, any

Cont/d...

concerns regarding access from the Church Road site to facilities and services by sustainable modes cannot be considered 'significant', particularly as the site is well within 500m of a bus stop.

The SHELAA also makes a remark of *"Back land site adjacent to conservation area"* and mentions *"Significant concern also related to heritage"*. In our view, however, the extended site area provides opportunity for a sensitively designed residential development, set amongst landscaping and open space, which would positively contribute and not be detrimental to the character and appearance of the conservation area. The site would be developed in accordance with the existing context which has been set by 58 Church Road with regards to depth of development north of Church Road and by the new thatch cottage at 52 Church Road in terms of design and materials. This would align with the Conservation Area Appraisal and Management Plan (May 2006) which makes specific reference to ensuring that *"future development proposals are strictly controlled in terms of design and materials"* to avoid inappropriate development. If any harm was to be found to the conservation area as a result of proposed development of this site, in our view this harm would be outweighed by the provision of much needed housing, particularly affordable housing, in this part of Wanborough. The identified constraints should therefore not preclude the potential for allocating or developing this site for residential development.

Concluding Remarks

The NPPF at paragraph 61 states that ***"To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed"*** [our emphasis].

The sites submitted as part of this representation will, in accordance with paragraph 73 of the NPPF, add a variety of small/medium size sites to the Borough's housing land supply which can be delivered quickly. This will help to reduce reliance on strategic allocations which are and will continue to take significantly longer to deliver due to known infrastructure constraints (i.e. Kingsdown and NEV) and land assembly constraints (i.e. Town Centre).

The submitted sites provide opportunities for high-quality residential development across the Borough and will also deliver significant public benefits including affordable housing and green infrastructure as well as site specific enhancements and further contributions through relevant planning obligations and Community Infrastructure Levy (CIL). These public benefits, particularly in areas like Wanborough where there is a significant shortfall in affordable housing, would outweigh any potential adverse impacts of development.

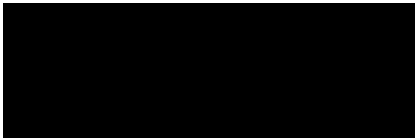
We therefore urge Swindon Borough Council to give these site submissions full consideration for potential allocation as the new Local Plan 2023-2043 progresses towards Regulation 19.

Cont/d...

Planning Policy Team
Swindon Borough Council

We would be more than happy to provide additional information and discuss these site submissions with the Council further if required.

Yours sincerely



Vickesh Rathod BSc (Hons), MSc, MRTPI
Associate Director
DPDS Ltd part of DPDS Consulting Group



Enc.

- Representation Form
- 4no. Call for Sites Forms
- 4no. Location Plans



Respondent No: 362

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name David

Q3. Last Name Mason

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) D M Mason

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

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

SBC admin note: Please see attached response.

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

not answered

Commentary on Swindon Local Plan Chapters 5, 9, 10, 11 & 12 and Transport Vision Paper

by

David Mason, [REDACTED]

Summary

The entire Local Plan shows a poverty of ambition for the provision of enhanced urban and green spaces. It shows a poverty of ambition for the reduction in the use of motorised modes for travel. It positively encourages the provision of additional capacity for motorised modes of travel. It shows a poverty of ambition for the provision of greener more climate protecting streets. It even fails to mention air source heat pumps and solar panels in policy.

Too many of these policies use the term ‘should’ or other words which will allow developers to ignore the intent. Planning officers will waste a lot of time trying to make developers apply ‘should’ policies. It is far more time-efficient for officers to apply a derogation to a Local Plan Policy by making developers state their case for such a derogation than it is for officers to persuade developers to provide ‘should’ issues. ‘Should’ policies will almost always fail at appeal because developers can pay better Counsel than the Council. If these policies are not required for proper development of Swindon, then omit them, if they are required then use shall, must etc.

Proposed changes to the Local Plan text are in ***sans serif italic text***. Commentary is in **[sans serif text]**.

CHAPTER 5: SUSTAINABLE, HIGH-QUALITY DEVELOPMENT

Strategic Policy SP1:Sustainable Development

1. All proposals for new development must be sustainable; making effective use of land, integrating well into existing ***travel*** routes and connections, and designed to a high-quality (including considerations for carbon reduction in line with policies CSE1 **[Policy CSE1 is not in the Plan]** and CSE 2 of this Plan).

2. The Council will promote high quality design and effective use of land by:

- a) requiring a ‘design-led’ approach to optimising density and site potential responding sensitively to local distinctiveness.
- b) supporting brownfield redevelopment (subject to other policies in this Plan).
- c) encouraging tall buildings where they meet the policy requirements set out in Policy SD5.
- d) requiring new developments to be safe, accessible and designed to a high-quality.
- e) requiring developments to preserve or enhance Swindon’s heritage assets ***(where applicable)*** and be designed in a sympathetic manner to their surrounding character.
- f) supporting development that ***aims to will*** create attractive, engaging spaces which are more likely to be well-used and resilient.
- g) supporting development that improves and facilitates active lifestyles, and improves the wellbeing of new and existing communities, and

h) supporting 'meanwhile' uses (where they are policy compliant).

3. Where infrastructure is required to be provided by new development, the Council will **~~expect~~ require** this to be appropriately phased, taking account of local infrastructure pressures. **[Local residents very often complain that new housing is not supported by adequate new infrastructure. Waiting times at GP surgeries are long. Without adequate infrastructure, development will be resisted. The term 'expect' will not stand scrutiny at planning appeals.]**

~~4. The approval of new development will be conditional on the appropriate water infrastructure and energy capacity being in place. Developers should engage with Thames Water and SSEN (Scottish and Southern Electricity Networks) early in the planning process in line with Policies U1 and U2.~~ [This policy places development in the gift of profit-seeking companies. They are thus invited by this policy to seek rents from developers by ransoming all development. Infrastructure Charges are levied on new development so infrastructure providers cannot delay or frustrate development. It is uncertain whether this policy is legal.]

SD1: Effective Use of Land

1. Development proposals **~~should~~ shall** make effective use of land through optimising density (including through the use of layout and design), whilst being sympathetic to the surrounding environment. **[We now have enough dwellings in brown brick with grey windows, as in west Wichelstowe and adjacent to Wakefield House. Neither of these developments are sympathetic to the surroundings, with west Wichelstowe resembling a barracks.]**

2. Proposals for employment uses **~~should~~ shall** demonstrate how they **~~have sought to~~ will** intensify floorspace capacity.

3. In addition to the above, windfall development **~~is expected to~~ shall**:

b. Build upon existing concentrations of activities and existing infrastructure;

c. Not require major investment in new infrastructure, including transport, water supply and sewage. Where this is unavoidable, development must be appropriately phased to coincide with new infrastructure provision. **[This policy places development in the gift of profit-seeking companies. They are thus invited by this policy to seek rents from developers by ransoming all development. Infrastructure Charges are levied on new development so infrastructure providers cannot delay or frustrate development. It is uncertain whether this policy is legal.]**

4. Temporary/'meanwhile' uses will be supported **~~in principle~~**, where they will benefit the vitality of the Borough's Strategic Growth Locations or district centres.

SD3: High-Quality Design

Strategic Growth Locations

1. Where development is proposed in the Borough's Strategic Growth Locations (as identified on the Policies Map), proposals must:

- a) demonstrate how the scheme fits into the wider delivery ambitions of the area via a comprehensive masterplan that considers key **travel** routes and public spaces allowing for safe and easy movement for all users through the development; **[Delivery should be programmed to achieve access by sustainable means at the start of occupation so that sustainable travel is encouraged from the start of occupation and does not rely on changing entrenched travel modes when delivered later in the occupation programme.]**
- b) show ~~consideration for~~ how the development will contribute to the Borough's Green Infrastructure network;
- c) contribute to landscaping and public realm improvements (as part of a wider masterplan); and
- d) positively contribute to the overall quality of the area, ~~both short-term and~~ over the lifetime of development.

General Design Principles

2. All development proposals, including extensions, alterations and change of use to existing buildings must:

- a) be of a high-quality design in order to facilitate strong placemaking, creating an inclusive, safe and accessible environment for all individuals;
- b) be sympathetic to the existing townscape, local character and history of the area including the surrounding built environment; **[We now have enough dwellings in brown brick with grey windows, as in west Wichelstowe and adjacent to Wakefield House. Neither of these developments are sympathetic to the surroundings, with west Wichelstowe resembling a barracks.]** and,
- c) show consideration for ancillary parts of development including bin storage and effective cycle parking so that these aspects are appropriately and effectively integrated in a secure and well-designed manner ~~(where applicable)~~.

3. All development proposals (excluding householder applications) must:

- a. be designed with safety and crime-prevention in mind. This should be clearly demonstrated within design proposals for major sites **[by what?]**;
- b. be accessible to a wide range of ~~specific needs users~~;
- c. contribute positively to the public realm, ~~where this is applicable~~, **[We now have enough dwellings in brown brick with grey windows, as in west Wichelstowe and adjacent to Wakefield House. Neither of these developments are sympathetic to the surroundings, with west Wichelstowe resembling a barracks.]** and
- d. make efficient and effective use of land through layout, arrangement of plots and design.

4. Apartments (residential units that may share a common access but also include duplexes and maisonettes on single or split levels and with or without private entrances) must:

- a) avoid single-aspect units. If ~~it is justified that~~ there is no other option available, single aspect units may not face north; must only comprise a limited number of the overall units; and must include additional mitigating amenity measures such as generous **[how big?]** balconies;
- b) achieve natural light and ventilation, and mitigate ~~the potential for against~~ excessive solar gain or moisture retention;
- c) avoid runs of double banked internal corridors with no natural light;
- d. include access to private external space that equates to 10m² min per apartment or 5m² min per apartment within the Town Centre. This may be provided as either private balcony space, by shared amenity gardens or a combination; and
- e. Provide communal areas designed to encourage interaction between neighbours, for example, fixed seating or communal lobby space.

Space Standards

5. All residential development including new build, conversions, subdivisions and extensions, across all tenures, is required to meet, as a minimum, internal space standards set out in the Nationally Described Space Standards.

SD4: Inclusive Design

1 ~~Major~~ development proposals ~~should of greater than 9 dwellings shall:~~ **[When would these not be necessary?]**

- a. meet a range of specific individual needs, including those of the young, elderly and those with a disability,
- b. provide a wide assortment of house types and tenures including affordable housing that is tenure-blind in design (in accordance with policies HC1 and HC2), and
- c. be inclusive, accessible and safe incorporating design attributes that reduce the likelihood of crime, antisocial behaviour and the fear of crime itself.
- d. Provide routes for sustainable travel within and from the development.**

2 New and enhanced public realm and other public spaces must:

- a. be **fully** accessible to everyone and can be entered, exited, used and navigated independently, safely and easily.
- b. have no disabling barriers that create inaccessible areas for those with impaired mobility **[such as pedestrian chicane barriers?]**, or require them to seek separate routes; and,
- c. ensure street and ~~transport travel~~ infrastructure is designed to be inclusive and enhance safety (aspects to be considered include **the active prevention of parking on footways**, width of routes/paths/access points, enhanced lighting, safe travel routes, seating provision and tactile paving.) **[Where are the standards for these? Are these standards adequate?]**

SD6: Villages and Development in the Countryside

Design Quality within Villages

1. Development proposals within village settlement boundaries **~~should~~ shall** refer to relevant Neighbourhood Plan policies, Design Codes, Guidance, Conservation Area Appraisals (where **relevant available**) and pay particular attention to the landscape setting of the village, the shape and form of the settlement and the nature of the buildings themselves to support locally distinctive design.

2. Development proposals **~~should~~ shall** reflect local densities in grading development in a scheme with medium to higher densities within the village core or as defined by Neighbourhood Plans, and having regard to the relevant Conservation Area Appraisal (where applicable).

3. Outside ~~of~~ the urban area boundary and rural settlement boundaries the following types of development will be supported:

- i. new dwellings that accord with national policy on ‘isolated new dwellings in the countryside’ and the conversion of agricultural buildings to residential use, provided that:
 - in the case of the re-use of a redundant or disused building, the building is worthy of retention, structurally sound and capable of conversion without substantial reconstruction, and that the proposal is in-keeping with the original character of the building;
 - the number of units and density of development is appropriate to the building's location;
 - the building has an existing curtilage, or a curtilage which can be created, which does not adversely affect the landscape character of the vicinity, or character and significance of building if converted;
 - the potential impact on heritage assets is assessed and, **~~if necessary,~~** appropriately mitigated.
- ii. dwellings that are rural exception sites or entry level exception sites that meet the requirements of national policy and are adjacent to an existing settlement.
- iii. agricultural workers’ dwellings in accordance with relevant policies.
- iv. low carbon and renewable energy development in accordance with policies CSE1 and CSE2.
- v. the diversification of a viable farm holding.
- vi. the development, (on sites adjacent to a village), of community facilities in accordance with Policy SD6.
- vii. rural tourism and leisure facilities which respect the character of the countryside, including small-scale visitor accommodation.
- viii. the creation of small-scale rural offices or the expansion of other existing rural-based businesses through conversion of existing buildings or new buildings.

CHAPTER 9: AN ENVIRONMENTALLY SUSTAINABLE SWINDON

SP6 – Climate Stability and the Environment

1. The Council will require proposals for development to:

- a) promote and encourage approaches to tackling climate change and improving the environment, **[what does this mean?]**
- b) positively contribute towards the net zero agenda,
- c) **consider encourage** building reuse and retrofitting,
- d) manage issues such as flood risk, overheating and nuisance through high-quality, sustainable design,
- e) ~~seek to~~ improve the Borough's air quality through the promotion of sustainable transport and the protection and enhancement of the Borough's green infrastructure network, **including the planting of street trees to reduce urban street heat stress**
- f) be designed to deliver high-density schemes **connecting to sustainable travel routes in the most connected areas** to reduce the need for car-travel,
- g) protect and enhance biodiversity,
- h) protect watercourses,
- i) ~~seek to~~ deliver low carbon infrastructure,
- j) deliver increased energy efficiency in both new and existing development, and
- k) use electricity as the first source of temperature control and energy use (for example, an **air or ground source heat pump, solar panels and batteries**, electric boiler or electric only kitchen) ~~where viable~~.

CS1: Carbon Reduction and Sustainable Design in new development

Sustainable Design

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

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

Carbon Reduction

2. Development proposals **should shall**:

- a) minimise the energy consumption of the development by incorporating measures to reduce the impact of overheating/cooling and mitigate heat traps within the development including through a fabric-first approach, **including tree planting** and
- b) minimise operational and embodied carbon emissions in the construction of development.

3. All **major** non-residential developments ~~are expected to~~ **shall** achieve BREEAM excellent standards.

4. All **major** residential-led mixed-use developments will be required to ~~consider meet or exceed~~ BREEAM – Community standards or any other relevant building efficiency standards with the clear focus on resolving **improving overall** sustainability of the area.

CSE2: Whole Life Carbon Assessments (WLCA)

1. ~~Major~~ development proposals over **49 9** units, ~~or any other developments 4,999 m2 of floorspace~~ are required to undertake whole life-cycle carbon assessments to support their proposals

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

CSE3: Green Infrastructure in New Developments

[I have been unable to find a definition of green infrastructure/ green infrastructure network in the Local Plan. All references to Green Infrastructure/Green Infrastructure Network are therefore rendered open to question on each and every planning application]

1. Proposals for **Major** Developments must incorporate appropriate, multifunctional green infrastructure in accordance with the Council's latest adopted version of the Green Infrastructure Strategy. This means proposals **should shall**:

- a. Integrate green infrastructure including nature-rich landscape treatment into the design of new development. Any green/blue features **should shall** be tailored to the specific context of the site and surrounding area;
- b. Retain and incorporate existing green infrastructure ~~where practical~~, particularly mature/valuable trees (Policy CSE6), hedgerows and water features;
- c. Improve linkages and strengthen connections with the wider green infrastructure network and deliver priorities within the Green Infrastructure Strategy;
- d. Connect to and enhance the integrity of the Nature Recovery Network and wider ecological networks;
- e. Provide ~~for~~ accessible recreational access and use; and,
- f. Maintain and enhance the quality and connectivity of access networks, including connecting to Public Rights of Way and integrating active travel routes (linking workplaces, schools, community facilities and public transport hubs)

2. Proposals including provision for green infrastructure ~~should~~ **shall** set out clearly how the green infrastructure has been designed to secure multi-functional benefits which contribute to the following:

- a. Health and wellbeing, including facilitating recreation and play for people of all ages and abilities
- b. Habitat creation **and enhancement**
- c. Addressing climate change (including carbon sequestration, reducing flood risk, reducing urban heating and promoting urban cooling **including the provision of street trees**)
- d. Enhancing the appearance and character/sense of place
- e. Edible planting or community food growing

3. Where green infrastructure is provided, arrangements must be made and agreed for its **long-term** 'in perpetuity' management, maintenance and funding prior to the development commencing (see also Policy HL3).

4. **Major** development proposals should use the Natural England 'Green Infrastructure Standards' or any comparable successor document to demonstrate that green infrastructure of an appropriate quantity and quality will be provided. This includes ensuring that green infrastructure is designed in accordance with the Natural England Green Infrastructure Planning and Design Guide.

Urban Greening Factor

5. Major development proposals should achieve the following target scores against the Urban Greening Factor for England
:

- a) 0.4 for predominantly residential development, and
- b) 0.3 for predominantly non-residential development.

6. The use of Building with Nature standards to support compliance with this policy is also **encouraged-required**

CSE4: The Green Infrastructure Network

1. The Borough's Green Infrastructure Network and Assets, as defined on the Policies Map and set out in the Green Infrastructure Strategy, will be protected, maintained and ~~where possible~~ **enhanced**.

2. Development that would sever or diminish the value (which can include Placemaking / Ecological and Landscape value) of a Green Infrastructure corridor will not be permitted.

3. ~~Where possible~~, proposals for development, ~~including in all cases Major Development~~ must:

- a) ~~identify opportunities to provide~~ link areas of green infrastructure together, in line with the priorities set out in the Green Infrastructure Strategy, in order to fill gaps within the existing Green Infrastructure network.
- b) provide new connections and enhancements to the existing Green Infrastructure network ~~where this is practicable~~ and, where the development falls adjacent to the network, ensure that the network is not severed by putting in place measures to maintain its functionality and connectivity.
- c) ~~pursue opportunities for the creation of create~~ new Green Infrastructure and its integration (in line with Policy CSE3);
- d) not result in the loss or harm to any visually or ecologically important habitats or features; and
- e) protect, enhance and secure net gains in biodiversity (in line with Policy CSE8).

CSE5: Great Western Community Forest

1. ~~Major~~ development proposals must:

- a. Be consistent with the objectives of the Great Western Community Forest (GWCF) which are:
 - I. Landscape and nature conservation,
 - II. Woodland management and creation,
 - III. Lifestyle and health for communities,
 - IV. Economic regeneration
- b. Ensure that there is a net increase in tree cover (in line with Policy CSE6) through an appropriate contribution to the planting of meaningful ~~quantums quanta~~ of new woodland and trees of landscape significance and, ~~where appropriate~~, provide and contribute to cohesive canopy cover in the right locations, including urban and residential streets, car parks etc., considering relevant landscape, amenity, inclusivity, historic environment and biodiversity matters;
- c. Ensure there is access to local woodlands and that there are opportunities for communities and businesses to benefit from GWCF, and
- d. Ensure they align with Green Infrastructure Policy CSE3.

CSE6: Trees

- 1. Development ~~should shall~~ protect and enhance visually or ecologically important habitats or features including trees, hedges and woodlands having regard to the guidance of the Borough Council's Supplementary Planning Document Trees Protection on Development Sites (or any successor strategy).
- 2. Existing habitats, trees, hedgerows and woodland of value ~~should shall~~ be sympathetically integrated into the design of new development

3 . If planning permission is granted for a development which necessitates the removal of trees, their loss **~~should~~ shall** be mitigated by new tree planting **on a ratio of 3 new trees to every 1 tree lost** within the development.

3. Proposals for **major** development **~~should~~ shall** achieve a future canopy cover of 25% of the site through retention of existing trees/hedges, new planting and other green infrastructure (e.g. green roofs/living walls). Every effort **~~should~~ shall** be made to meet the canopy cover requirement through retained and new trees on site but, where the provision of the requisite proportion of future canopy cover is determined by the Local Planning Authority not to be possible or desirable, contributions to off-site provision will be in line with Policy CSE5 Great Western Community Forest.

CSE7: Landscape and Areas of Non-Coalescence

Development and Landscape

1. Development must demonstrate whether it will have a landscape impact.

Where **~~they are likely to~~ it does** have a landscape impact, proposals for development must demonstrate that:

- a. the intrinsic character, diversity and local distinctiveness of the landscape is protected, conserved and enhanced;
- b. their design, materials and the colours used are sympathetic to the surrounding landscape.
- c. Landscape harm is avoided, or where unavoidable, **equivalent** sensitive mitigation is delivered which may be on or offsite.

2. In meeting the above requirements, proposals must demonstrate how they have taken into account the most recent Landscape Character Assessment for the Borough, or any other adopted Landscape Studies (such as those produced by Neighbourhood Plans), and assessed the potential impact of the proposal on the following attributes of the landscape:

- a. existing landscape form, features, topography and character;
- b. the contribution of the landscape to biodiversity and wildlife;
- c. local geology and geo-diversity;
- d. views, visual amenity and the landscape setting (including views both in and out - visually sensitive skyline, geological and topographical features);
- e. valuable historic and heritage areas and assets;
- f. environmental amenity such as tranquillity & noise, pollution and light pollution; and,
- g. the existing social, physical, economic and environmental roles and functions of the landscape at the local and strategic scale (for example as a place of cultural and leisure activity, living, employment and separation of settlements).

3. Where a proposed development is **likely shown** to have a **significant more than minimal** impact on the landscape character or visual amenity of an area, a Landscape Visual Impact Assessments (LVIAs) or Environmental Impact Assessment will be required. LVIAs **~~are encouraged to~~ will** be informed by an appropriately detailed Environmental Colour Study. North Wessex Downs National Landscape

4. Proposals which are within or affect the setting of North Wessex Downs National Landscape **must show how they will** complement the special qualities and the character of the landscape.

5. Any such **[which?]** development proposals must:

- a. Provide a Landscape Visual Impact Assessment with reference to the National Landscape Areas most recent Management Plan and Landscape Character Assessment
- b. Provide details of the colour palette and materials to be used, and explain how these have been informed by The North Wessex Downs “Colour guide 2021” or any subsequent update published.
- c. Preserve the ‘Dark Skies’ character of the landscape through preventing or minimising light pollution. All proposals will ~~be expected to~~ demonstrate clear regard to the guidance set out in Dark Skies of the North Wessex Downs – A Guide to Good External Lighting (2021).

Areas of non-Coalescence

1. Areas of non-Coalescence, as defined in the Policies Map, will be maintained to retain a rural and open character of the land, and protect the separate identity of settlements (both existing and allocated).
2. Small scale proposals for development in this area will only be permitted where they retain and enhance the countryside character and achieve the following criteria (cumulatively or individually):
 - a) Avoid any loss of landscape quality, and retain the openness and character of the land around its existing settlements and the land allocations; and
 - b) Protect the setting and separate identity of its settlements (both existing and allocated) by avoiding their coalescence, by physical separation and a sense of separation; and
 - c) Involve the re-use, conversion or extensions of existing buildings, or
 - d) Are an essential requirement directly related to the economic or social needs of the rural community.

CSE8: Biodiversity, Geodiversity and Nature Recovery

Biodiversity Net Gain

1. Proposals for development (except where exemptions, modifications or exclusions have been made by legislation) must demonstrate how they will achieve a minimum of 10% biodiversity net gain to habitats, measured using the latest Biodiversity Metric.
2. Planning applications **should shall** include a proposed strategy for delivering biodiversity net gain which demonstrates how the following hierarchy for delivery will be applied:
 - a. on-site delivery;

- b. off-site (through allocation of biodiversity units from a new or existing registered net gain site);
- c. contribution in-lieu (purchase of National Credits).

3. A less preferential delivery route will only be acceptable where it is demonstrated that a more preferential option is not achievable, or where evidence demonstrates that the contribution will deliver greater environmental benefit, net gains in biodiversity or link to adjoining priority habitats and/or support nearby priority species; and in all cases aligns with the Wiltshire and Swindon Local Nature Recovery Strategy.

4. In cases where statutory net gain does not apply, development shall protect and enhance biodiversity and provide net local biodiversity gain. Where this is **demonstrably not demonstrated to not be** achievable, mitigation and compensation measures will be agreed.

Nature Recovery Strategy:

4. Such **[which?]** proposals for development must have regard to the Local Nature Recovery Network map and relevant accompanying measures. Internationally Designated Sites North Meadow and Clattinger Farm SAC

5. Within the defined Zone of Influence as shown on the policies map, development that results in a net increase in residential dwellings, tourist accommodation, student accommodation, Gypsy and Traveller sites, or other development which may generate recreational impact on the North Meadow and Clattinger Farm Special Area of Conservation (SAC), must make the appropriate mitigation contribution as set out in the Interim North Meadow and Clattinger Farm Mitigation Strategy or any subsequent update. Mitigation measures include:

- a) Financial contributions toward Strategic Access Management Measures (SAMM)
- b) Within the 4.2km of the North Meadow SAC, proposals of **50 10** units or above will **normally** be expected to provide sufficient natural recreational greenspace on site to ensure that residents do not impact upon the SAC. For Proposals of below **50 10** units, or where on-site mitigation is not possible, then financial contributions will be made toward strategic alternative green space infrastructure projects.
- c) Within the Outer Zone of Influence (4.2 – 9.4 km) larger development that triggers EIA regulations **may also will** be required to deliver SANG / make strategic alternative green space infrastructure projects contributions. This will be decided on a case-by-case basis in consultation with Natural England.

6. Proposals located beyond the of the defined Zone of Influence that trigger EIA regulations will require consultation with Natural England **and proof of the results of this consultation** to determine mitigation required on a case-by-case basis.

7. Proposals for development where there is a net increase in overnight accommodation; new agricultural development that will lead to an increase in intensity and provide additional nutrients to wastewater; development there is likely to create a large amount **[what is a large amount?]** of wastewater; or which are located within the hydrological catchments of the River Lambourn SSSI/SAC are required to demonstrate ‘nutrient neutrality’.

8. A Habitats Regulation Assessment will be required to demonstrate that appropriate mitigation is secured to ensure that the project will not lead to a negative impact on the ecological integrity of the SAC.

9. Where proposals for development are close to the boundary of a catchment, consideration will **~~need to~~** be given to whether the wastewater drains into or outside of the catchment.

Species enhancements:

9. Proposals for development must, in addition to Biodiversity Net Gain requirements, deliver enhancements for species diversity. ***Details of these enhancements must accompany all planning applications.*** These must be targeted to relevant local receptors and species priority measures identified in the Local Nature Recovery Strategy. This may include the provision for nesting birds, bats, hedgehogs and other native species

10. Development proposals affecting sites and species identified in Table 9 must demonstrate that they will be protected commensurate with their designation or status. Applicants will need to obtain advice from a qualified ecologist who is a member of the Chartered Institute of Ecology and Environmental Management ***and include that advice in any planning application.***

CSE9: Managing Flood Risk

1. Proposals for development must:

- a) Be directed to areas with the lowest risk of flooding. Proposals for development must demonstrate that the sequential test has been applied and, if necessary, the exception test; taking into account the potential impacts of climate change.
- b) Not adversely affect flood routing and thereby increase flood risk, including risk of sewer flooding, elsewhere on, or off, site;
- c) Be safe **[what does safe mean in this context? have access on foot in any case of flooding? have upper storeys above maximum flood level?]** over the lifetime of the development, taking into account the increased risk of flooding due to climate change;
- d) Be accompanied by a drainage strategy that demonstrates the safe ***and*** discharge of surface and ground water from a development which must be managed in a sustainable and co-ordinated way that mimics the natural drainage network; and
- e) Demonstrate adequate provision within the design of the site to ***reduce eliminate*** water from the development site causing flood risk elsewhere.

2. Where a development site encroaches within the modelled 1 in 100 (1%) annual 'probability plus' allowance for climate change floodplain, a floodplain storage analysis must be undertaken as part of any site-specific FRA to compare the floodplain capacity pre- and post- development, and must demonstrate that no detrimental impact and ***ideally*** an improvement over the existing situation.

3. If, following application of the Sequential Test (and Exception Test if relevant), it is considered appropriate to locate new development in an area of Flood Zone 2 or 3, then the

proposed development must be appropriately designed to ensure that the occupants/users are safe **[what does safe mean in this context?]** from flooding and the development does not increase flood risk to third parties. Sustainable Drainage Systems (SUDS)

4. Proposals for development must:

a) Incorporate SuDs in a manner that is integral to site design and meets CIRIA guidance, and guidance set out in the latest Strategic Flood Risk Assessment (Levels 1 and 2). Design of SuDs must adhere to the following:

- i. Utilise the SuDs management train to demonstrate that all SuDs functions are achieved, with reference to benefits for amenity, biodiversity, water quality and flood risk management;
- ii. Mitigate any adverse impact that raised groundwater levels may have upon the operation of SuDs;
- iii. Incorporate ~~opportunities for~~ pollution capture and removal of urban run off; and
- iv. Include **and demonstrate** arrangements for lifetime management and maintenance of SuDS schemes

5. In all cases, SUD's **~~should~~ shall** not be located in Flood Zone 3.

Buffers

6. Proposals for **major** development must demonstrate that run off rates are attenuated to greenfield run-off rates. Where this cannot be demonstrated, higher rates will need to be robustly justified and risks quantified. For **major** development on brownfield land, proposals must demonstrate discharge as close as practicable to greenfield rates.

7. Development adjacent to a Main River or Ordinary Water Course **~~should~~ shall** include a buffer zone along both sides of the watercourse between the top of the riverbank and the proposed built development (including footpaths, **maintenance access routes**, landscaping, lighting and fencing).

8. These riparian buffer zones **~~should~~ shall** be preserved, or managed to contribute to the achievement of Biodiversity Net Gain. The buffer will vary depending on the sensitivity of the watercourse and existing conditions of the site and will be agreed with the Local Planning Authority and Environment Agency as appropriate.

9. ~~Where relevant~~, Proposals for development should ~~identify opportunities for~~ **include the** opening up and naturalising any culverted sections of watercourse ~~where feasible~~, in line with the aims of the Water Framework Directive.

11. In all **relevant** cases, on-site surface water is to be managed as close to source as possible.

12. Certain areas are, as required by the Environment Agency, to be safeguarded for the implementation of flood risk management measures. The detailed boundaries of these will be provided at Regulation 19 consultation. Proposals for development affecting this land will require consultation with the Environment Agency.

CSE10: Unstable Land

1. Development of land that is either known to be unstable, or is strongly suspected of instability because of its previously history or geology, shall only be permitted when:
 - a. the extent of any proposed remedial measure required to achieve a level of land stability suitable for the proposed use, capable of supporting future development loads **[including up to a 30 storey building?]** has been identified, and
 - b. the nature of the land stability has been assessed to the satisfaction of the Local Planning Authority and the land stability evaluation report has been provided and agreed with the Council prior to the determination of an application.
2. Where planning permission is granted, conditions ***may will*** be imposed requiring the execution of any necessary remedial works.

CSE11: Contaminated Land

1. Proposals for development on land that is either contaminated, or is strongly suspected of being contaminated, shall only be permitted when:
 - a. it can be demonstrated that the development will not expose people, the natural environment, property, water bodies, or other receptors to levels of potential contamination which give rise to unacceptable risks or harm to health or other adverse impacts
 - b. a contaminated land site evaluation and risk analysis has been submitted and approved by the Local Planning Authority evaluating the level and precise nature of any contamination and need for removal or treatment;
 - b. the potential of existing contaminants to pollute both surface water and ground water, during and after construction has been established;
 - c. Acceptable decontamination measures required to achieve a level of land quality suitable for the proposed end use have been identified; and
 - d. Appropriate measures are taken to ensure that migrating gas is safely dealt with where development is proposed on land adjacent to an uncontrolled ‘gassing’ landfill site.
2. Where planning permission is granted, conditions ***may will*** be imposed requiring the execution of any necessary remedial works.

CSE12: Reducing Noise and Pollution

1. All proposals for development must:
 - a) minimise nuisance resulting from development;
 - b) manage and mitigate the impacts of any nuisance generated through the operation of the development (such as noise, vibrations, odour, fumes and dust pollution) on people and the built and natural environment over the life of the development; and

c) ensure noise-sensitive and air quality-sensitive development is directed to appropriate locations, and that they are protected against any existing and proposed sources of noise and air pollution through careful design, layout and use of materials and adequate insulation.
Pollution and Air Quality

2. Development proposals, alone or cumulatively, must be designed in order to avoid and reduce any significant adverse impacts from **noise and** pollution, on any of the following receptors:

- a) Human health and wellbeing;
- b) Biodiversity, and Biodiversity Assets protected under the Habitats Regulations;
- c) The water environment;
- d) The effective **operation enjoyment** of neighbouring land uses; and
- e) An Air Quality Management Area or areas at risk of exceeding relevant limit values.

3. Where a development is a sensitive end-use, that there will not be any significant adverse effects on health, the environment or amenity arising from existing poor air quality, sources of odour or other emissions to air.

4. Proposals within an air quality management area, or in a location likely to generate motor vehicle journeys through an Air Quality Management Area) or an area at risk of becoming an AQMA **as defined by the Planning Authority** will be required to demonstrate:

- a) there is no adverse effect on air quality in an air quality management area (AQMA); pollution levels within the AQMA will not have a significant adverse effect on the proposed use/users,
- b) the development will not lead to the declaration of a new AQMA;
- c) the development will not interfere with the implementation of the current Air Quality Action Plan (AQAP);
- d) any sources of emissions to air, odours and fugitive dusts generated by the development are adequately mitigated so as not to lead to loss of amenity for existing and future occupants and land uses; and
- e) any impacts on the proposed use from existing poor air quality, odour and emissions are appropriately monitored and mitigated by the developer.

4. Where a proposal could be subject to adverse impacts due to pollution or disturbance, by reason of its proximity to an existing business or community facility, the 'agent of change' principle applies. In such circumstances the onus will be on the promoter of the new development to demonstrate that there will be suitable mitigation provided to protect the amenity of the future occupants.

CHAPTER 10: A HEALTHY, SOCIALLY CONNECTED SWINDON

SP7: Healthy Living

1. The Council is fully supportive of a holistic approach to health that acknowledges the role the built environment plays in delivering healthy outcomes. To achieve this, the Council will **~~seek to~~ secure** (through the policies in this Plan and any strategic interventions):

- a. active travel improvements, including walking and cycling infrastructure and green links between destinations;
- b. the right mix of housing tenure to meet the needs of the community;
- c. new jobs that are delivered through a wide range of sectors;
- d. the provision of accessible new services as part of new developments; and
- e. a reduction in any open space deficiencies;
- f. and reductions to air and noise pollution.
- g. street trees to provides a cooler and healthier public place environment.**

HL2: Protecting Open Spaces

1. Land identified as Open Space, as defined on the Policies Map, will be protected from development.

2. As established in national policy, existing open space, sports and recreational buildings and land, including playing fields and formal play spaces, **~~should~~ shall** not be built on unless:

- a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a **~~suitable~~** location **close to those using the present facility**; or
- c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

HL3: Open Space in New Developments

1. All **major** development involving the construction of new dwellings are required to contribute to the provision of public open space **in line with SPLD.....**

2. If on-site provision is not possible, it is **expected required** that development contributes to the mitigation of identified deficiencies in the quantity, quality and accessibility of open space in the areas identified in the Open Space Audit and Assessment. All other outdoor sport and play facilities are in addition to these core Open Space standards.

3. The type and amount of on and off-site provision of open space will depend on the location and size of the proposal, or identified need and will:

- a. be of an appropriate type, size and quality as outlined in the Council's most recent Open Space Audit and Assessment; and
- b. be publicly accessible; and
- c. be appropriately designed to be safe, usable **by all persons**, integrated into the development site and maximise green infrastructure benefits and functions; and
- d. Take opportunities to connect to the Strategic Green Infrastructure Network.

4. Developers **~~should~~ shall** engage with Parish and Town councils, alongside the Borough council, regarding the **ongoing future** maintenance of new green space, and developers are encouraged to offer first refusal for the **ongoing future** maintenance of open spaces and amenities delivered through new residential developments to Parish and Town councils.

HL4: Child Friendly Places and Play

1. Development Proposals for schemes that are likely to be used by children and young people **~~should~~ shall**:

- a. incorporate opportunities for informal recreation into the design of the scheme which provides for children and young people of all **ages and** abilities,
- b. incorporate safe and accessible routes for children and young people to access existing facilities such as local play provision, schools and youth centres, and
- c. for large scale public realm developments, incorporate an appropriate **[where is the size of 'appropriate' given?]** quantum of incidental play space.

2. Where formal play provision is required, or where a new or upgraded play provision is proposed, the design **~~should~~ shall**:

- a. be fully integrated in the design of new residential developments and be fully accessible to children and young people **of all ages and abilities and their carers**,
- b. integrate into the wider network of public open spaces and not be severed from the rest of a neighbourhood by physical barriers such as main roads,
- c. be 'landscape led' in design, integrated into the surrounding landscape and landscape context. This may include swales and ditches, mounding, level changes, boulders, logs, sensory planting and tree planting (which can also be climbable) and other elements
- d. incorporate existing trees and Include additional tree planting to provide shade and climate resilience, and elements that allow contact with nature,
- e. keep sealed and artificial surfaces including wet pour and rubber crumb to a minimum, only to be used where necessary for fall protection,
- f. include, **~~where possible~~** 'loose parts' such as gravel, sand and water, or play equipment that utilises these elements,
- g. use inclusive equipment and elements, sensitively designed and integrated into the play area, not segregated, and
- h. include seating, cycle stands, space for pushchairs, bins and signage as well as the required equipment.

3. Where public space is redesigned, proposed or required, opportunities for informal play and opportunities to support public art strategies **~~should~~ shall** be considered.

HL5: Community Infrastructure

1. Development proposals that generate a need for community infrastructure must:

- a. ensure that the infrastructure, including enhancement or extension of existing infrastructure, is provided by direct provision on-site. Where clear evidence demonstrates that this cannot be achieved, a financial contribution will be taken in-lieu **[and used for what?]**;
- b. ensure that infrastructure is operational **~~no later than the~~ when no more than 25%** of the appropriate phase of development for which it is needed **is occupied**; and
- c. set out how the long-term management and maintenance of infrastructure will be achieved **and funded**.

2. Proposals of over 100 units should consult with appropriate bodies (such as the Bath and North East Somerset, Wiltshire and Swindon ICB, on any successor organisation) at an early stage **preparing and before the submission of** a planning application. **Planning applications shall include details of the consultations including responses.**

3. Proposals for new, extended or expanded community facilities **~~should~~ shall** first be directed to town, district and local centres and be co-located (or be capable of supporting colocation) with other community uses **~~where possible~~**. If need can be demonstrated for facilities outside of these areas, provision must be **in a** location within or adjacent to existing settlements.

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 **of 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.
- e) The community facility is no longer economically viable for the established use **demonstrated by evidence**; or
- f) There is no existing management and funding resources or that could be generated within the community **or externally** that could secure and sustain a community facility that meets identified local needs; or
- g) The community facility cannot be secured or sustained through the partial redevelopment of the site

CHAPTER 11: UTILITIES

U1: Wastewater, Sewage Infrastructure and Water Supply

[These policies place development in the gift of profit-seeking companies. They are thus invited by this policy to seek rents from developers by ransoming all development. Infrastructure Charges are levied on new development so infrastructure providers cannot delay or frustrate development. It is uncertain whether these policies are legal.]

~~1. Proposals for development must:~~

- ~~a) Demonstrate that there is adequate water supply and sewerage infrastructure capacity both on and off the site to serve the development, including for any individual phases, and that developments would not lead to problems for existing or new users; and~~**
- ~~b) Ensure there is separation of foul and surface water;~~**

~~2. Where there is a capacity constraint, the Local Planning Authority will, where necessary, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.~~

~~3. Where appropriate, planning permission for developments which will result in the need for off-site upgrades will be subject to conditions to ensure the occupations are aligned with the delivery of the necessary infrastructure upgrades.~~

~~4. The approval of new development will be conditional on the appropriate water infrastructure being in place. Developers are encouraged to engage with Thames Water early in the planning process.~~

5. Any development or expansion of water supply and sewerage infrastructure must demonstrate that it is needed to meet current and future supply needs **[to what date?]**

6. Development proposals for sensitive development, such as residential use within 800 metres of a Sewage Treatment Works must demonstrate how any adverse impacts relating to odour have been mitigated. Water use efficiency

~~7. New residential homes buildings and [residential addressed below]~~

Commercial development must be built to high standards of water efficiency through the use of water efficient fixtures and fittings.

8. All new residential developments **~~should~~ shall** be designed so that water use does not exceed 110 l/person/day. To demonstrate compliance with the requirements, applications must be set out the estimated water consumption of the proposal using the 'Water Efficiency Calculator' template.

9. New developments **~~should~~ shall** demonstrate how they will provide and utilise rainwater harvesting (for example, where **~~feasible~~ appropriate**, a minimum of 1 waterbutt located in private outdoor space)

10. On **major** residential developments, and commercial developments **~~over 4000m³~~**, **[there is a get-out clause below]** water re-use technologies for rainwater harvesting and greywater recycling, or other water use technology are required unless **demonstrated to be** unviable or unfeasible on the site. Rainwater harvesting systems should be designed to meet a minimum drought frequency standard **[of what?]**.

U2: Digital Connectivity and Telecommunications

1. All new development **~~should~~ shall** ensure that appropriate telecommunications infrastructure **~~such as ducting~~** is provided during the construction phase to enable the development to be connected to full fibre broadband.

2. Telecommunications infrastructure **~~should~~ shall** be sited and designed to minimise the impact on the amenity of the surrounding area

U3: Energy Networks

1. Proposals for development must demonstrate: **[Does this policy relate solely to energy generation and supporting infrastructure?]**

a) connectivity to the national grid,

b) that grid capacity is available **~~or will become available shortly~~** to support the development, and

c) **~~in the case of major development~~**, that renewable and/or sustainable on-site solutions have been considered and, where appropriate, incorporated into the scheme.

D1: Developer Contributions and Viability

1. Where Local Plan requirements cannot be met by developments as a result of their viability impacts, these proposals will **~~be expected to~~** provide evidence of this in the form of a financial appraisal, which must be produced and independently verified at the applicants' expense.

2. If a financial appraisal demonstrates that required S106 requirements cannot **viably** be afforded, the Council will prioritise infrastructure as follows:

I. Essential **sustainable travel, transport and** road **~~and transport~~** infrastructure **(in this order)** to unlock good growth;

- II. Health infrastructure (including new and expanded health facilities, leisure provision and open space), where there is an identified need.
- III. New and expanded education facilities, where there is an identified need.
- IV. Affordable Housing
- V. Climate sustainability **including street trees**
- VI. Any other matters

3. In all cases where a S106 agreement is entered into, a Monitoring fee will ~~be expected~~ **to** form part of that agreement.

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

5. Where development is phased, the Council may require a viability review mechanism as part of S106 requirements, whereby viability is reassessed at an appropriate time (or times) based on **evidence such as phasing**, up-to-date values and costs. If such a review indicates a policy compliant scheme would then be viable, financial contributions will be **sought required** up to the level required by policy.

6. Payments secured through planning obligations will **normally** [the get-out is below] be required at agreed trigger points, although some, for example monitoring fees, are paid upon signed agreement.

Transport Vision Paper

Summary

The entire Transport Vision Paper is car-centric and very light on promoting the sustainable modes it says are necessary for a healthy Swindon. It shows a poverty of ambition for the provision of enhanced cycling and walking routes. It shows a poverty of ambition for the reduction in the use of motorised modes for travel. It positively encourages the provision of additional capacity for motorised modes of travel, meeting all needs for additional capacity shown by models. It shows a poverty of ambition for the provision of greener more climate protecting travel opportunities.

All together it is a vision of continuing as before and seeking no change to travel patterns by reducing sustainable travel times and increasing car travel times. In its present form, it will fail miserably to achieve/mitigate any of the issues it says are important for future health and wellbeing.

Proposed changes to the Local Plan text are in ***sans serif italic text***. Commentary is in **[sans serif text]**.

1.1 Issues

Data from the Borough's Joint Strategic Needs Assessment (2024) identifies the following key issues:

- There is an over-reliance on the car as a mode of transport in the Borough. The number of annual miles completed in motor vehicles has increased year on year over the past two decades in the Borough. For residents who travel to work, driving remains the predominant mode of transport with an average of 78% of Borough residents travelling by private vehicle to work.
- Since 2018, Active Travel (cycling and walking) in Swindon has fallen to levels significantly lower than the rest of the South West. Active Travel to school has also fallen by 6% between 2014 and 2022 and has been replaced by car journeys.
- Travelling by car to work is on average considerably quicker than travelling by bus, walking or cycling in Swindon. Car journeys for commuters on average take 7.6 minutes in the Borough; while travelling by public transport and walking takes 11.5 minutes and cycling takes 9.9 minutes. This aligns with the national picture.

[The issue identified in this analysis is therefore that walking and cycling journeys take too long and that car journeys are shorter in time.

The answer therefore is to make walking and cycling journeys shorter in time, and/or make car journey longer in time.

Additionally, sustainable trips to school need to be encouraged. This latter matter is more problematical as trips to school may be part of a trip to work.

You will have to ignore your highway colleagues on this matter. They actively discourage walking and cycling through the provision of poor routes and by making walking and cycling subservient to motorised modes under all circumstances. For examples of this, see how long you have to wait at a signal controlled pedestrian crossing before the amber and red appear, it is usually after all the cars within sight have cleared. Remember the closure and filling of underpasses at Coate and Queens Drive where pedestrians and cyclist could cross quickly and their replacement by signal controlled crossings as noted above, look at the pedestrian/cycle crossing islands on signal controlled junctions which are too small for bicycles (Biddestone Avenue/Marlborough Road junction).]

1.3 Addressing these issues

Considering these issues, the Council's vision is motivated by the following key drivers:

- To enhance health and wellbeing and encourage behavioural change in the next generation
- To reduce carbon emissions

- To improve connectivity across the Borough and to important economic and scenic hubs outside of the Borough
- To create more attractive, safer, and greener places to live

[All worthy, how are they to be met?]

While the vision will seek to promote more sustainable modes of transport, the Council recognises that patterns of movement that depend on the car will likely remain a significant proportion of trips. Still, the Council is looking to encourage a modal shift and ensure that new patterns of movement arise that use greener and more active modes for local journeys. Growth plans must therefore ensure new developments can be accommodated without causing overcapacity of the road network and providing mitigations where needed.

This paper sets out a vision for Transport in our new local plan and our key priority policy area and objectives. It also includes a provisional summary of some of the initial questions raised by stakeholders, and how we address these as part of the next stage of work required for Regulation 19.

[Well, the worthy issues above are not to be met, because the Council ‘will seek to promote’ but not ensure provision of, and recognises ‘that patterns of movement that depend on the car will likely remain a significant proportion of trips’ so maybe we are not going to do anything, and

‘Growth plans must therefore ensure new developments can be accommodated without causing overcapacity of the road network and providing mitigations where needed.’ **So we are not going to seek to limit car movements in any way because we are going to demand full capacity availability for any car movements from new development. Sorry everyone, but cycling and walking are going to remain the longest journey times and the issues identified in paragraph 1.1 will be utterly ignored.]**

2.1 Sites and Growth

A central feature of the new Local Plan includes the Heart of Swindon ambitions for redevelopment of the Town Centre to create up to 8000 new homes, with allocations proposed in the Plan for around 4,500 homes. Development of the Central Area will be concentrated around the rail hub and the new Fleming Way bus boulevard. It will be key to implement new cycling and walking routes to support the new population.

[So there may be new walking and cycling routes, but only close to the Town Centre and not in the peripheral areas to employment and education facilities.]

The Plan further proposes that sustainable growth corridors will fan out from the Central Area. Some will link with the key strategic village sites allocated by the Local Plan 2026: Wichelstowe, New Eastern Villages, and Kingsdown. The new Local Plan will encourage the continued growth of these key village sites. These will be connected to Swindon by several radial road/transit corridors as shown in the Transport diagram below:

[So some of the key strategic village sites will get sustainable growth corridors, but only to the Central Area and not linking to other sustainable growth corridors, employment areas or education facilities. The paper is therefore rather low on provision for sustainable travel opportunities to a choice of destinations.]

2.2 How we make the vision happen – Key priorities

C) Improving transport corridors

Create a series of new mixed-use, radial transport corridors as shown on Fig 1, providing priority bus and cycling routes to connect the town centre to the main local housing and economic sites proposed in the Local Plan, providing a structure for future services, facilities and intensification. **[But not the non-main sites and only to the Town Centre, and not necessarily linking to existing routes.]**

D) Bus Rerouting

~~Examine~~ **Implement** **[Otherwise there is a poverty of ambition]** proposals for a new bus connector routes to and around the town centre linking key leisure, retail and housing sites.

E) Enabling Active Travel and behaviour change

To support healthy communities and a greener environment, encouraging walking, cycling and public transport as methods of transport ~~where feasible~~ **[poverty of ambition again]** by bringing forward the necessary infrastructure (for example, secure cycle/mobility scooter parking, improved pavements, shared spaces). This includes ~~the potential for~~ **[poverty of ambition again]** providing key hubs and ~~where possible~~ **[poverty of ambition again]** controlling car parking at key ~~new~~ sites around and in the town centre.

H) Road Capacity

Continue to model and mitigate impacts of growth sites on the road network and key motorway junctions as part of our development management policies. Consider **[poverty of ambition again]** ideas such as car sharing and introducing bus priority controls at key junctions. **[Just like paragraph 1.3, there is no plan to limit road capacity to encourage sustainable travel, so why all the warm words in this document, it is basically therefore waffle.]**

2.4 Funding and Delivery

Swindon's new Infrastructure Delivery Plan will set out the strategy **and timing** for bringing forward transport infrastructure. ***The emphasis will be on sustainable travel means.***

~~***It is acknowledged that funding is difficult with many initiatives taken forward through feasibility and business case work jointly funded by the Council, Network Rail, other agencies, developers and through grants plus s106 and CIL.***~~

Funding of sustainable travel modes to achieve the aims of this Paper will be through S106 and CIL funding streams. The Borough will also pursue other funding streams as an add-on to S106 and CIL funding.



Respondent No: 363

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name James

Q3. Last Name Proyer

Q4. Job Title (where relevant) Senior Planning Manager

Q5. Organisation (where relevant) Persimmon Homes (Wessex)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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

SBC admin note: Please see attached response.

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

not answered



Our Ref:

Date: 13 October 2025

RE: Swindon Local Plan 2043 – Response to Reg 18 Consultation

Thank you for the opportunity to comment on the above consultation. Please find below our representations on a number of draft policies.

SHL 03: Kingsdown

Persimmon Homes, together with Primegate Properties, controls the majority of the land within the Kingsdown Strategic Growth Location (SGL), identified as site reference 18-037 on the Policies Map. This land is subject to an outline planning application (ref. S/OUT/17/1821) which benefits from a resolution to grant planning permission, following extensive engagement with the Council and statutory consultees including National Highways and Natural England. The scheme accords with the principles of comprehensive, masterplanned development and is capable of delivering the full range of infrastructure required to support growth in this location.

Persimmon supports the continued allocation of Kingsdown as a Strategic Growth Location and the recognition of its capacity to deliver significant housing within the Plan period. However, a number of modifications are required to ensure the policy aligns with the established planning position, avoids duplication of work already undertaken through the outline application process, and provides clarity on the role of subsequent proposals

1. Extent of the allocation

The western boundary of site 18-037 as shown on the amended Policies Map does not align with the boundary of Persimmon's application site (S/OUT/17/1821). The boundary should be amended to ensure consistency with the established application area and approved masterplan parameters.

2. Relationship with existing application (S/OUT/17/1821)

An additional criterion should be inserted:

"Development proposals must not impede or prejudice the delivery of the outline planning application (S/OUT/17/1821) which benefits from a resolution to grant planning permission. Spare capacity within the local highway network and local education infrastructure should be afforded in the first instance to the committed development."

This is necessary to safeguard delivery of the allocation and ensure that infrastructure provision is sequenced appropriately.

3. Comprehensive approach and infrastructure contributions

The policy should clarify the process for any additional or adjoining applications that now fall within the extended Kingsdown Strategic Growth area. These proposals must:

- Demonstrate how they will accord with the approved allocation masterplan associated with S/OUT/17/1821; and
- Make a proportionate contribution toward strategic infrastructure to ensure equitable delivery across the wider allocation.

At present, the inclusion of additional parcels appears to be arbitrary and based solely on speculative submissions, rather than the result of a comprehensive assessment of reasonable alternatives to extend the allocation area in the next plan period.

4. Policy wording – specific criteria

- Criterion (2b): Delete reference to “and health”, as there is no demonstrable need for a new health facility in this location.
- Criterion (2h): Amend to clarify this is one possible form of mitigation, not a definitive requirement: “...by, for example, enhancing accessibility of Stanton Country Park or through alternative agreed measures.”

5. Highway and phasing matters

Policy should confirm that, where required, the Council will use Grampian-style conditions to control the timing of development until critical infrastructure is in place, ensuring a fair and deliverable approach across all contributors to the Strategic Growth Location.

SD3: High-Quality Design

Strategic Growth Locations

Persimmon Homes supports the principle of identifying Strategic Growth Locations to guide the delivery of housing and infrastructure. However, clarification is needed on how these areas have been defined and how boundaries have been determined.

For Kingsdown, the Strategic Growth Location includes additional land parcels beyond those assessed as part of the established masterplanned area (S/OUT/17/1821). Their inclusion appears to be based on speculative planning applications rather than a comprehensive assessment of their relationship with the wider allocation.

The Council should therefore review the extent of the Strategic Growth Location boundaries to ensure they are justified, consistent, and evidence-based.

If additional land is to be included, the policy should require that:

“Any additional land within a Strategic Growth Location must accord with the approved allocation masterplan for the principal development area and make proportionate contributions towards shared infrastructure.”

Apartments

Persimmon supports the aim of securing high-quality apartments but considers the policy overly rigid. The use of “must” should be replaced with “should” to allow appropriate flexibility for site-specific design solutions while maintaining high standards of amenity and layout.

Criterion (d) should recognise that access to high-quality shared or public open space can provide equivalent amenity value. Suggested wording:

“Apartments should include access to private or shared external space that equates to 10m² per apartment (or 5m² within the Town Centre). This may be achieved through private balconies, shared amenity gardens, or convenient access to high-quality public open space within the development.”

HC1: Housing Tenures and Sizes

Persimmon supports the principle of delivering mixed and balanced communities that respond to identified housing needs. However, elements of the policy as drafted are overly prescriptive and do not allow adequate flexibility for developers to respond to market demand and local circumstances.

The requirement for consultation with the Council’s housing department on all major residential proposals is unnecessary in relation to market housing. Developers are best placed to determine the appropriate mix of market dwellings based on up-to-date market intelligence and sales evidence.

Suggested amendment:

“All major residential development should provide a balanced mix of tenures and house sizes having regard to the latest Local Housing Needs Assessment and market demand at the time of application, and should be informed by consultation with the Council’s housing department where appropriate.

This retains the Council’s role in shaping affordable housing provision while allowing flexibility for market housing to respond to local demand.

Criterion (2a) states that developments should include 1 and 2 bedroom properties. While smaller homes play an important role in providing choice, the policy should recognise that the appropriate dwelling mix will vary depending on site location, character, and market context.

Suggested amendment to criterion (2a):

“deliver a balanced approach to housing delivery, including smaller dwellings where this is appropriate to the site context and market demand, to support mixed communities.”

This ensures that the policy’s objectives can be achieved without imposing fixed or disproportionate requirements on sites where larger dwellings may be more suitable or deliverable.

HC2: Affordable Housing

Persimmon supports the continued emphasis on delivering affordable housing to meet identified needs across the Borough, and has been a major contributor to the delivery of affordable homes over the past plan period. However, aspects of the policy as drafted require clarification and greater flexibility to ensure it remains deliverable and consistent with national policy.

Affordable housing quantum and tenure (criterion 1)

The policy is currently unclear on whether 30% affordable housing represents a fixed requirement or a minimum target. The wording “as a minimum” introduces uncertainty and could suggest that schemes delivering 30% would not be policy compliant. The policy should confirm that 30% is the target level, subject to viability.

Similarly, the reference to a local need for 78% social rent requires clarification. It is not clear whether this is intended to apply to every scheme or simply reflects borough-wide evidence. Requiring this

proportion on each site would be unbalanced and could compromise the creation of mixed and sustainable communities, particularly in larger developments.

Flexibility should therefore be built into the policy to allow tenure mix to respond to site-specific circumstances and engagement with the local authority and Registered Providers.

Suggested rewording:

“All major residential development should seek to deliver 30% affordable housing, subject to viability. The tenure mix should have regard to the latest Local Housing Needs Assessment, while also ensuring deliverability and the creation of balanced communities.”

First Homes (criterion 7)

The Council’s statement that it is “focused on other types of affordable housing” is ambiguous and risks downplaying the role of First Homes, which are a nationally supported tenure and can make a valuable contribution to housing affordability, particularly on sites where viability or infrastructure costs constrain delivery of rented tenures.

The additional local connection criteria proposed under points (i)–(iii) are more restrictive than national guidance and could exclude eligible purchasers with legitimate local links - for example, someone renting in, say, Purton but working in Swindon. Such restrictions could unnecessarily reduce take-up and frustrate delivery and so we would suggest the authority reconsiders the potential to include those living in neighbouring authorities, particularly given the geography of the Borough.

Suggested rewording:

“Where First Homes are delivered, eligibility criteria should accord with national policy and guidance. Any additional local connection criteria should be applied only where robust justification is provided and where they would not unreasonably restrict access to eligible purchasers.”

HC3: Accessible Housing

Persimmon supports the principle of providing homes that are adaptable to the changing needs of households, where there is evidence of need. However, aspects of the policy require clarification to ensure it is applied consistently and is practical to implement.

Criterion (1b) – Relevance of site size threshold

The inclusion of a site area threshold (0.5 hectares) alongside the 50-dwelling trigger for M4(3) dwellings is unnecessary and potentially inconsistent. The need for accessible housing relates to overall dwelling numbers and local housing demand, not site area. It is unclear how site size would influence the need for M4(3) units, and its inclusion risks creating ambiguity for schemes that are low-density but on larger sites.

Suggested amendment:

“On major development sites of 50 dwellings or more, a minimum of 2% of all dwellings should meet Building Regulation requirement M4(3)...”

Criterion (3) – Plan scale requirement

The requirement for furnished plan layouts “to a scale of at least 1:100” is ambiguous. It is unclear whether this means 1:100 or larger (e.g. 1:50). For clarity and consistency with standard submission requirements, the policy should simply state:

“Plan layouts should be provided at a scale of 1:100 to demonstrate compliance.”

HC7: Self and Custom Build Housing

Persimmon supports the principle of promoting housing choice and diversity, including opportunities for self and custom build housing where appropriate. However, the current wording is too prescriptive for Strategic Growth Locations, which are generally intended to deliver housing efficiently through coordinated masterplanning and infrastructure delivery.

The term “expect” should therefore be replaced with “encourage” to reflect that self and custom build plots may not be suitable or deliverable on all sites.

Suggested amendment:

“In the Borough’s Strategic Growth Locations, the Council will encourage a mix of tenures and types (in line with policies HC1 and HC2), including opportunities for self-build and custom build where appropriate.”

ST4: Transport Assessments

Persimmon supports the principle of ensuring development is supported by appropriate transport assessment and mitigation. However, clarification is needed in relation to criterion (4).

Criterion (4) currently requires proposals with “relatively minor transport implications” to submit a Transport Assessment. This appears to be an error, as such schemes would ordinarily require a Transport Statement in line with Department for Transport guidance.

Suggested amendment:

“Proposals for development which will likely bring relatively minor transport implications (in accordance with Department for Transport guidance) will be required to submit a Transport Statement.”

It would also be helpful for the policy to provide a clear trigger threshold for residential development - such as the number of dwelling - so that applicants can determine at an early stage whether a Transport Assessment or Transport Statement is required. This would ensure consistent application of the policy and provide greater certainty to developers and decision-makers.

ST5: Parking

Persimmon supports the policy objective of promoting sustainable transport and well-designed parking solutions. However, criterion (3) is overly prescriptive as currently worded.

The requirement that all developments “must” provide a parking design and management plan, address local parking stress, and contribute to a Controlled Parking Zone (CPZ) where necessary, is not appropriate for all scales and types of development. Smaller residential schemes, for example, may not generate impacts justifying such measures.

Suggested amendment:

Replace “must” with “it is encouraged to” in criterion (3).

This change would retain the intent of promoting good parking design and electric vehicle provision, while allowing flexibility for proportionate application based on the nature and scale of each proposal.

SP6: Climate stability

Persimmon supports the principle of addressing climate change and improving environmental performance in new development. However, local policy should defer to national regulation on climate and energy standards to ensure certainty, consistency, and viability for developers.

The Government’s forthcoming Future Homes Standard will establish a nationally consistent approach to carbon reduction and energy performance. Local policies should therefore avoid introducing additional or divergent requirements that could undermine this consistency.

A single national framework provides the necessary clarity for the development industry to plan investment and deliver homes efficiently in support of the Local Plan’s housing objectives.

Amendments should be made to policy wording, particularly with regard to criterion (k), to clarify that local requirements on energy and carbon reduction will defer to national standards, including the Future Homes Standard.

CSE3: Green Infrastructure

Persimmon supports the objective of delivering high-quality green infrastructure in new development. However, the relationship between paragraphs 4 and 5 is unclear.

Paragraph 4 refers to compliance with Natural England Green Infrastructure Standards, while paragraph 5 sets Urban Greening Factor targets. In practice, both are methods to assess and quantify green infrastructure provision, and presenting them separately without clarification could be confusing for applicants and decision-makers.

CSE6: Trees

Persimmon supports the protection and enhancement of trees and green infrastructure in new development. However, criterion (3) is overly prescriptive.

Requiring that major development proposals achieve a future canopy cover of 25% of the site is unnecessarily restrictive. In practice, there may be alternative and more effective ways of enhancing biodiversity, as assessed through the Biodiversity Net Gain (BNG) process.

Suggested amendment:

“Major development proposals should seek to retain and enhance existing trees and hedgerows and deliver a measurable increase in canopy cover or other appropriate biodiversity enhancements, as demonstrated through the required Biodiversity Net Gain assessment.”

This wording provides flexibility, ensures effective biodiversity delivery, and aligns with the nationally mandated BNG framework.

CSE8: Biodiversity

Persimmon acknowledges the current need to mitigate recreational impacts on North Meadow and Clattinger Farm SAC.

However, the policy is based upon the Interim North Meadow and Clattinger Farm Mitigation Strategy, which is by definition a temporary or evolving approach. It is unclear whether the policy is intended to remain unchanged for the duration of the Local Plan period, particularly as it was understood that the geographical scope of the mitigation strategy may change over time. It would be helpful for the local planning authority to clarify this matter.

HL1: Health Impact Assessments

Persimmon supports the principle of designing major developments to create healthy places. However, the policy should clarify the application of Health Impact Assessments (HIAs) in the planning process.

Specifically, Reserved Matters applications for developments already assessed at the Outline stage should not be required to submit a further HIA, as the health-related impacts would have been considered and addressed during the Outline application.

Suggested amendment:

“Health Impact Assessments are required for major development proposals as set out in this policy. Reserved Matters applications for proposals with an approved Outline consent do not need to submit a separate HIA, unless new uses or material changes are proposed that would materially alter the health impacts considered at the Outline stage.”

D1: Developer Contributions

Persimmon supports the principle of ensuring developer contributions are proportionate and viability-tested. However, specific elements of the policy would benefit from clarification and adjustment to reflect statutory duties and practical delivery.

Clause 2 – Prioritisation of contributions:

Clause 2 currently prioritises education facilities below health infrastructure. Given the local authority’s statutory duty to provide education and the critical importance of timely school provision in new communities, education infrastructure should be given a higher priority where a need is identified.

Clause 6 – Timing of payments:

Clause 6 currently states that payments are normally required “at agreed trigger points, although some, for example monitoring fees, are paid upon signed agreement.”

In practice, monitoring will not commence until development begins, so it is more appropriate to link payments to commencement of development rather than the signing of the agreement.

Suggested amendment:

“Payments secured through planning obligations will normally be required at agreed trigger points, with monitoring fees payable on commencement of development rather than upon signing of the S106 agreement.”

Duty to cooperate

The Local Plan does not explicitly reference the Duty to Cooperate, and no supporting evidence paper addressing this requirement appears to have been provided as part of the consultation. This omission is critical, particularly given the Government's increased emphasis on the Duty to Cooperate in plan-making and the recent Vale of White Horse Local Plan examination, which failed in part due to a perceived failure to cooperate effectively with Oxford on housing need matters.

Persimmon encourages Swindon Borough Council to actively engage with neighbouring authorities, including Wiltshire Council, to explore opportunities for meeting local housing needs in a strategic, cross-boundary manner. Specifically, land to the west of Swindon within the Wiltshire administrative area could contribute towards shared housing needs. Such areas may be free of significant constraints and able to benefit from existing services and facilities within Swindon and surrounding settlements.

Administrative boundaries should not prevent effective cooperation in delivering sustainable growth and meeting housing needs. The Local Plan should demonstrate how cross-boundary collaboration will be pursued to ensure that housing needs are met in full and in a timely manner.

Footnotes

Please note there appears to be an issue with footnotes in the document.



Respondent No: 364

[Redacted]

[Redacted]

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[Redacted]

[Redacted]

- Q1. Title

Mr
- Q2. First Name

Gerald
- Q3. Last Name

Sweeney
- Q4. Job Title (where relevant)

Director
- Q5. Organisation (where relevant)

CarneySweeney on behalf of SevenCapital (Swindon) Limited

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

Policy HL2: Protecting Open Spaces Policy HL2 protects land as identified on the policies map as open space from development. The Policy permits the development of open spaces if an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use. We are supportive of the overall policy approach as this reflects the wording of Paragraph 104 of the NPPF. The policy is positively prepared and provides flexibility to allow development on existing open spaces where equivalent or better provision can be made elsewhere. This balanced approach recognises that not all open spaces are of equal value and that, in some cases, redevelopment can deliver overall improvements in the quality, accessibility, and functionality of open space provision. We consider that the wording of the draft policy should be amended to include a requirement for the Council to undertake a regular audit of the existing open space provision in any one ward as part of their Open Space Assessment. Swindon Borough Council's most recently published Open Space Assessment is dated March 2014 which does not provide an accurate reflection of the existing provision of open space in the Borough's wards, particularly in terms of quality, with many of the open spaces having deteriorated since the time the Open Space Assessment was published. The proposed revision to the draft policy wording aligns with Paragraph 104 of the NPPF which requires "planning policies to be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses). Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate".

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

SBC admin note: Please see attached response for formatted text.

Representation Form

	<p style="text-align: center;">Swindon Borough Council Local Plan</p> <p style="text-align: center;">Publication Stage (Regulation 18) Draft Local Plan Representation Form</p>	<p>Ref:</p> <p>(For official use only)</p>
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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	<input type="text"/>	<input type="text" value="Mr"/>
First Name	<input type="text"/>	<input type="text" value="Gerald"/>
Last Name	<input type="text"/>	<input type="text" value="Sweeney"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Director"/>
Organisation (where relevant)	<input type="text" value="SevenCapital (Swindon) Limited"/>	<input type="text" value="CarneySweeney"/>
Address Line 1	<input type="text" value="c/o agent."/>	<input type="text" value="██"/>
Line 2	<input type="text"/>	<input type="text" value="████████████████"/>
Line 3	<input type="text"/>	<input type="text" value="████████████"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text" value="████████"/>
Telephone Number	<input type="text"/>	<input type="text" value="████████████████"/>
E-mail Address	<input type="text"/>	<input type="text" value="██"/>

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

Other (please specify):

Part B – Please use a separate sheet for each representation

Name or Organisation:

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

Chapter	Policy HL2: Protecting Open Spaces	Policies Map		Evidence base document e.g. the Sustainability Appraisal	
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If selecting chapter, please note policy number and paragraph number if applicable.

4. COMMENTS

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

Policy HL2: Protecting Open Spaces

Policy HL2 protects land as identified on the policies map as open space from development. The Policy permits the development of open spaces if an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

We are supportive of the overall policy approach as this reflects the wording of Paragraph 104 of the NPPF. The policy is positively prepared and provides flexibility to allow development on existing open spaces where equivalent or better provision can be made elsewhere. This balanced approach recognises that not all open spaces are of equal value and that, in some cases, redevelopment can deliver overall improvements in the quality, accessibility, and functionality of open space provision.

We consider that the wording of the draft policy should be amended to include a requirement for the Council to undertake a regular audit of the existing open space provision in any one ward as part of their Open Space Assessment. Swindon Borough Council's most recently published Open Space Assessment is dated March 2014 which does not provide an accurate reflection of the existing provision of open space in the Borough's wards, particularly in terms of quality, with many of the open spaces having deteriorated since the time the Open Space Assessment was published. The proposed revision to the draft policy wording aligns with Paragraph 104 of the NPPF which requires "*planning policies to be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses). Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate*".

5. Changes

Our proposed changes to the draft wording of Policy HL2 are set out in red text below.

HL2: Protecting Open Spaces

1. Land identified as Open Space, as defined on the Policies Map, will be protected from development **unless it can be demonstrated that the criterion set out in Part 2 can be met in part or fully satisfied.**

The land identified as Open Space on the policies map will be assessed on a yearly basis as part of the Council's Open Space Assessment to quantify the current level and quality of provision in any one ward.

2. As established in national policy, existing open space, sports and recreational buildings and land, including playing fields and formal play spaces, should not be built on unless:
 - a. an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
 - b. the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
 - c. the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

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: 365

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- Q1. Title Mr
- Q2. First Name Gerald
- Q3. Last Name Sweeney
- Q4. Job Title (where relevant) Director
- Q5. Organisation (where relevant) CarneySweeney on behalf of SevenCapital (Swindon) Limited

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

We support the principle of Policy HC2 in seeking to secure affordable housing contributions from new development but the policy as currently drafted lacks sufficient clarity and transparency in relation to viability assessments. The Council should be required to undertake, maintain and publish viability evidence to justify the affordable housing targets and to ensure that the policy remains effective, deliverable and compliant with national planning guidance. The affordable housing target of 30% as a minimum must be based on up-to-date viability testing which reflects the current market conditions. Paragraph 59 of the NPPF requires plans to be underpinned by viability assessment which should be made publicly available. The Council should commit to a periodic review and publication of viability evidence throughout the plan period to ensure the affordable housing targets remain achievable. In addition, we consider that the policy should be amended to include a requirement for the Council to undertake a regular review and update of the Council's monitoring and evidence base 'Local Housing Needs Assessment' to ensure that the affordable housing targets and tenure mix are based on an up-to-date and accurate reflection of local housing needs and are deliverable throughout the plan period. Regular updates would ensure that the affordable housing target continues to reflect a genuine need and tenure demand across 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.

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Other (please specify):

Part B – Please use a separate sheet for each representation

Name or Organisation:

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

Chapter	Policy 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.

We support the principle of Policy HC2 in seeking to secure affordable housing contributions from new development but the policy as currently drafted lacks sufficient clarity and transparency in relation to viability assessments. The Council should be required to undertake, maintain and publish viability evidence to justify the affordable housing targets and to ensure that the policy remains effective, deliverable and compliant with national planning guidance.

The affordable housing target of 30% as a minimum must be based on up-to-date viability testing which reflects the current market conditions. Paragraph 59 of the NPPF requires plans to be underpinned by viability assessment which should be made publicly available. The Council should commit to a periodic review and publication of viability evidence throughout the plan period to ensure the affordable housing targets remain achievable.

In addition, we consider that the policy should be amended to include a requirement for the Council to undertake a regular review and update of the Council's monitoring and evidence base 'Local Housing Needs Assessment' to ensure that the affordable housing targets and tenure mix are based on an up-to-date and accurate reflection of local housing needs and are deliverable throughout the plan period. Regular updates would ensure that the affordable housing target continues to reflect a genuine need and tenure demand across Swindon.

5. Changes

Our proposed changes to the draft wording of Policy HC2 are set out below in red text.

HC2: Affordable Housing

1. All major residential development will be expected to maximise affordable housing delivery and provide, as a minimum, 30% affordable homes, of which there is a local need for 78% to be social rent, **subject to an agreed viability assessment. The Council will prepare, maintain and publish a borough-wide viability assessment to justify the affordable housing targets and thresholds in this policy which will be reviewed periodically.**
2. Where possible, affordable housing should be delivered on site and the mix of affordable housing sizes and tenures should reflect local housing needs evidence including the Local Housing Needs Assessment and plan sub area analysis and include a particular focus upon the delivery of social and affordable

rented units. The Council will maintain an up-to-date evidence base to support the implementation of this policy through regular monitoring and publication of housing market data at least every 2 years.

3. Off-site affordable housing either in part or whole of the 30% contribution will be considered in exceptional circumstances if it is not practical to deliver on-site or there are demonstrable benefits of off-site provision.
4. Affordable housing should be of high quality and of neutral ('tenure-blind') design and integrated within developments complying with standards set out under policies SD3 and SD4.
5. Off-site contributions should enable affordable housing to be provided elsewhere in the Borough. The contribution will be based on the difference between the open market value of a dwelling and the price a Registered Provider would pay if affordable housing were provided on-site.
6. Affordable housing will be secured through a planning obligation and on-site affordable housing should be transferred to the Registered Provider at the point agreed in the s.106 agreement and remain affordable in perpetuity.
7. The Council is focused on other types of affordable housing delivery, however, where First Homes do come forward, the following connection restrictions will apply:
 - i. The purchaser is ordinarily resident within Swindon Borough and has been for a continuous period of not less than 6 consecutive months prior to exchange of contracts for the relevant First Home; and/or
 - ii. The purchaser has a close family association within Swindon Borough by reason of a parent or child who is ordinarily resident within the Council's administrative borough; and/or
 - iii. The purchaser has been for a continuous period of not less than 12 consecutive months prior to exchange of contracts for the relevant First Home in permanent continuous employment with Swindon Borough.
8. The policy also applies to any self-contained units of accommodation within a residential institution (Use Class C2).

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Respondent No: 366

[Redacted]

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[Redacted]

- Q1. Title

Mr
- Q2. First Name

Gerald
- Q3. Last Name

Sweeney
- Q4. Job Title (where relevant)

Director
- Q5. Organisation (where relevant)

CarneySweeney on behalf of SevenCapital (Swindon) Limited

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[Redacted]

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

Policy SD5: Tall Buildings We are supportive of the principle of Policy SD5 which requires tall buildings to be located within Swindon's Central Area where there is a high-level of accessibility. However, the policy wording does not include a clear definition of what constitutes a 'tall building'. The supporting policy text at paragraph 5.7 states "based on an assessment of the urban townscape, Tall Buildings in Swindon Borough are considered to be over six storeys in height". We are supportive of the inclusion of a tall buildings policy in the Local Plan, but we consider the threshold definition of a "tall building" at as six storeys at paragraph 5.7, to be too low. There are already a number of existing buildings within Swindon's Central Area which are above six storeys, particularly in the town centre. As a result, defining six storeys as "tall" risks capturing mid-rise development proposals that are already reflective of the existing urban context. By setting the threshold too low, the policy imposes complex design criteria requirements on relatively modest scale proposals which could discourage schemes from coming forward that are of an appropriate scale and would contribute to efficient use of land. We therefore do not consider that the policy is in accordance with the essence of national planning policy. The NPPF (para 129-130) encourages making efficient use of land and optimising density in sustainable locations. Setting too low of a threshold for "tall buildings" could make this more difficult by subjecting otherwise suitable mid-rise proposals to disproportionate design scrutiny. In many urban local planning authorities, thresholds tend to be set significantly higher. We therefore consider that a higher threshold for a tall building is appropriate to ensure that genuinely tall buildings are subject to robust design requirements while allowing mid-rise developments to proceed without undue constraints. In summary, a higher tall building threshold would better support regeneration and the delivery of housing in sustainable central urban location and better align with the NPPF's emphasis on efficient use of land and appropriate densities in sustainable locations. Whilst we are supportive of the intention of the policy to promote high quality design for tall buildings, we consider that the design criteria as drafted is overly prescriptive, lacks clarity, and may impact the viability of 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.

SBC admin note: Please see attached response for formatted text.

Representation Form

	<p style="text-align: center;">Swindon Borough Council Local Plan</p> <p style="text-align: center;">Publication Stage (Regulation 18) Draft Local Plan Representation Form</p>	<p>Ref:</p> <p>(For official use only)</p>
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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

<p>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.</p>
--

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	<input type="text"/>	<input type="text" value="Mr"/>
First Name	<input type="text"/>	<input type="text" value="Gerald"/>
Last Name	<input type="text"/>	<input type="text" value="Sweeney"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Director"/>
Organisation (where relevant)	<input type="text" value="SevenCapital (Swindon) Limited"/>	<input type="text" value="CarneySweeney"/>
Address Line 1	<input type="text" value="c/o agent."/>	<input type="text" value="██"/>
Line 2	<input type="text"/>	<input type="text" value="████████████████"/>
Line 3	<input type="text"/>	<input type="text" value="████████████████"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text" value="████████"/>
Telephone Number	<input type="text"/>	<input type="text" value="████████████████"/>
E-mail Address	<input type="text"/>	<input type="text" value="██"/>

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

Other (please specify):

Part B – Please use a separate sheet for each representation

Name or Organisation:

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

Chapter	Policy SD5: Tall Buildings	Policies Map		Evidence base document e.g. the Sustainability Appraisal	
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If selecting chapter, please note policy number and paragraph number if applicable.

4. COMMENTS

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

Policy SD5: Tall Buildings

We are supportive of the principle of Policy SD5 which requires tall buildings to be located within Swindon's Central Area where there is a high-level of accessibility. However, the policy wording does not include a clear definition of what constitutes a 'tall building'. The supporting policy text at paragraph 5.7 states *"based on an assessment of the urban townscape, Tall Buildings in Swindon Borough are considered to be over six storeys in height"*.

We are supportive of the inclusion of a tall buildings policy in the Local Plan, but we consider the threshold definition of a "tall building" at as six storeys at paragraph 5.7, to be too low. There are already a number of existing buildings within Swindon's Central Area which are above six storeys, particularly in the town centre. As a result, defining six storeys as "tall" risks capturing mid-rise development proposals that are already reflective of the existing urban context. By setting the threshold too low, the policy imposes complex design criteria requirements on relatively modest scale proposals which could discourage schemes from coming forward that are of an appropriate scale and would contribute to efficient use of land. We therefore do not consider that the policy is in accordance with the essence of national planning policy.

The NPPF (para 129-130) encourages making efficient use of land and optimising density in sustainable locations. Setting too low of a threshold for "tall buildings" could make this more difficult by subjecting otherwise suitable mid-rise proposals to disproportionate design scrutiny. In many urban local planning authorities, thresholds tend to be set significantly higher. We therefore consider that a higher threshold for a tall building is appropriate to ensure that genuinely tall buildings are subject to robust design requirements while allowing mid-rise developments to proceed without undue constraints.

In summary, a higher tall building threshold would better support regeneration and the delivery of housing in sustainable central urban location and better align with the NPPF's emphasis on efficient use of land and appropriate densities in sustainable locations.

Whilst we are supportive of the intention of the policy to promote high quality design for tall buildings, we consider that the design criteria as drafted is overly prescriptive, lacks clarity, and may impact the viability of development.

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.

Policy SD5: Tall Buildings

Our proposed changes to the wording of the policy relates to the inclusion of a clear definition of a 'tall building' and one which is set at a higher threshold than 6 storeys. We propose the following wording:

*"Based on an assessment of the urban townscape, tall buildings in Swindon Borough are considered to be over **ten storeys in height or are substantially taller than its immediate surroundings and alters the skyline.**"*

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: 367

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Q1. Title Mr

Q2. First Name Gerald

Q3. Last Name Sweeney

Q4. Job Title (where relevant) Director

Q5. Organisation (where relevant) CarneySweeney on behalf of SevenCapital (Swindon) Limited

[Redacted]

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[Redacted]

[Redacted]

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

Policy SD9: Heritage Transport: Wilts & Berks Canal We wish to object to Policy SD9 as currently drafted. Whilst we appreciate the historic and recreational value of the canal, we consider that the policy as drafted places disproportionate emphasis on safeguarding and reinstating the canal route without sufficient consideration of land-use conflicts, viability, and other strategic development priorities. We consider the policy to lack clarity and evidence as it does not clearly define the extent of the safeguarding, the feasibility of canal restoration, or the timescale for delivery. There appears to be limited evidence demonstrating that full reinstatement is viable or deliverable during the plan period. We understand that the restoration of the Wilts & Berks Canal is reliant on external funding, making its delivery uncertain therefore the policy should not rely on undeliverable infrastructure as a material planning constraint. The Policy as drafted is not consistent with paragraph 36 of The NPPF which requires local plans to be justified, effective, and deliverable. Without a clear implementation strategy or funding plan for the Wilts and Berks Canal, the safeguarding of the canal fails these tests. The policy should be more flexible and proportionate, safeguarding only those sections where restoration is realistic and compatible with wider development objectives. The current policy is not justified, not effective, and not consistent with national policy (NPPF paragraph 36).

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

SBC admin note: Please see attached response for formatted text.

Representation Form

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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	<input type="text"/>	<input type="text" value="Mr"/>
First Name	<input type="text"/>	<input type="text" value="Gerald"/>
Last Name	<input type="text"/>	<input type="text" value="Sweeney"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Director"/>
Organisation (where relevant)	<input type="text" value="SevenCapital (Swindon) Limited"/>	<input type="text" value="CarneySweeney"/>
Address Line 1	<input type="text"/>	<input type="text" value="██"/>
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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 checked="" type="checkbox"/>	Other social media <input type="checkbox"/>	Local newspaper (printed) <input type="checkbox"/>	Don't remember <input type="checkbox"/>
Council social media <input type="checkbox"/>	Local news website <input type="checkbox"/>	Local Radio <input type="checkbox"/>	Council Website <input type="checkbox"/>

Other (please specify):

Part B – Please use a separate sheet for each representation

Name or Organisation:

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

Chapter	Policy SD9: Heritage Transport	Policies Map	Wilts and Berks Canal Route	Evidence base document e.g. the Sustainability Appraisal	
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If selecting chapter, please note policy number and paragraph number if applicable.

4. COMMENTS

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

Policy SD9: Heritage Transport: Wilts & Berks Canal

We wish to object to Policy SD9 as currently drafted. Whilst we appreciate the historic and recreational value of the canal, we consider that the policy as drafted places disproportionate emphasis on safeguarding and reinstating the canal route without sufficient consideration of land-use conflicts, viability, and other strategic development priorities.

We consider the policy to lack clarity and evidence as it does not clearly define the extent of the safeguarding, the feasibility of canal restoration, or the timescale for delivery. There appears to be limited evidence demonstrating that full reinstatement is viable or deliverable during the plan period. We understand that the restoration of the Wilts & Berks Canal is reliant on external funding, making its delivery uncertain therefore the policy should not rely on undeliverable infrastructure as a material planning constraint.

The Policy as drafted is not consistent with paragraph 36 of The NPPF which requires local plans to be justified, effective, and deliverable. Without a clear implementation strategy or funding plan for the Wilts and Berks Canal, the safeguarding of the canal fails these tests.

The policy should be more flexible and proportionate, safeguarding only those sections where restoration is realistic and compatible with wider development objectives.

The current policy is not justified, not effective, and not consistent with national policy (NPPF paragraph 36).

5. Changes

Our proposed amendments to the draft wording of Policy SD9 (Heritage Transport) are highlighted in red text below.

"Wilts and Berks Canal

- Existing and aspirational canal alignments, as defined on the Policies Map, shall be safeguarded to maintain the possibility of the long-term re-establishment of the Wilts & Berks Canal and North Wilts Canal as navigable waterways. This will be achieved by ensuring:

- a) that the integrity of those existing stretches of canal (and its remaining associated structures) **within the proposals map designation area** are not harmed by development proposals; and
 - b) that aspirational stretches are protected from development (including by infrastructure), unless affected alternative alignment is proposed.
2. Proposals for new or restored stretches of canal will be permitted where all following criteria are met. The proposal must:
- a) ensure land necessary to the proper function of the canal and associated development such as footpaths, bridges, locks, ponds, basins including for maintenance requirements, is secured for these purposes.
 - b) ensure that its environmental impacts have been fully assessed and where appropriate any mitigation forms part of the scheme, so there is no unacceptable risk or harm to:
 - I. ecology, flood risk, water resources and water quality;
 - II. landscape character and significance of heritage assets (including archaeology);
 - III. **canal proposals should not constrain other forms of sustainable growth, including other aspirational development proposals allocated within the Local Plan**".

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: 368

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

- Q1. Title

Mr
- Q2. First Name

Gerald
- Q3. Last Name

Sweeney
- Q4. Job Title (where relevant)

Director
- Q5. Organisation (where relevant)

CarneySweeney on behalf of SevenCapital (Swindon) Limited

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

Policy SGL 01 - Swindon's Central Area Policy SGL 01, Part 1 We are fully supportive of Part 1 of Policy SGL-01 which continues to identify Swindon's Central Area as a strategic growth location to deliver up to 8,000 new homes and 6,000 new jobs, alongside a regenerated and vibrant main town centre environment, new leisure facilities and new social and cultural infrastructure. Policy SGL 01, Part 3 Part 3 of Policy SGL-01 requires proposals for major development to identify and pursue opportunities to deliver coordinated schemes with neighbouring parcels and come forward through a comprehensive masterplan and states that 'piecemeal development will be resisted in areas where wider regeneration potential has been identified'. We consider the requirement for major development proposals to only come forward as part of a comprehensive masterplan is overly rigid and risks making the policy ineffective. Whilst the principle of coordinated development is supported, the blanket resistance to "piecemeal development" may constrain the delivery of sites, particularly where landownership is complex and fragmented and could unjustifiably delay proposals that are otherwise policy compliant. By requiring every site within Swindon's Central Area to be brought forward as a comprehensive masterplan could slow delivery and consequently undermine the Council's ability to demonstrate a fiveyear housing land supply. The policy does not include definitions of what constitutes "major development," "piecemeal development," or "wider regeneration potential." This is likely to create uncertainty for applicants and ultimately cause delays to the processing of planning applications within this area of the Borough. We do not consider that the policy is consistent with national policy as The NPPF supports comprehensive planning but also emphasises flexibility and the need to significantly boost housing supply (NPPF paras 11, 60, 74). A blanket resistance to piecemeal development conflicts with this. The NPPF (paras 68, 119–122) places strong emphasis on maintaining a sufficient supply of deliverable housing sites. The current policy wording risks undermining this by preventing otherwise suitable and deliverable parcels from coming forward in a timely manner. Policy SGL 01 Part 5 We welcome Part 5 of Policy SGL 01 which supports tall buildings within Swindon's Central Area provided proposals meet the design quality and safety requirements set out in Policy SD5.

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.

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Part A

1. Personal

Details*

Agent's Details (if applicable)

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Title	<input type="text"/>	<input type="text" value="Mr"/>
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Job Title (where relevant)	<input type="text"/>	<input type="text" value="Director"/>
Organisation (where relevant)	<input type="text" value="SevenCapital (Swindon) Limited"/>	<input type="text" value=""/>
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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:

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

Chapter	Policy SGL 01- Swindon's Central Area	Policies Map	Evidence base document e.g. the Sustainability Appraisal
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If selecting chapter, please note policy number and paragraph number if applicable.

4. COMMENTS

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

Policy SGL 01 - Swindon's Central Area

Policy SGL 01, Part 1

We are fully supportive of Part 1 of Policy SGL-01 which continues to identify Swindon's Central Area as a strategic growth location to deliver up to 8,000 new homes and 6,000 new jobs, alongside a regenerated and vibrant main town centre environment, new leisure facilities and new social and cultural infrastructure.

Policy SGL 01, Part 3

Part 3 of Policy SGL-01 requires proposals for major development to identify and pursue opportunities to deliver coordinated schemes with neighbouring parcels and come forward through a comprehensive masterplan and states that '*piecemeal development will be resisted in areas where wider regeneration potential has been identified*'.

We consider the requirement for major development proposals to only come forward as part of a comprehensive masterplan is overly rigid and risks making the policy ineffective. Whilst the principle of coordinated development is supported, the blanket resistance to "piecemeal development" may constrain the delivery of sites, particularly where landownership is complex and fragmented and could unjustifiably delay proposals that are otherwise policy compliant.

By requiring every site within Swindon's Central Area to be brought forward as a comprehensive masterplan could slow delivery and consequently undermine the Council's ability to demonstrate a five-year housing land supply.

The policy does not include definitions of what constitutes "major development," "piecemeal development," or "wider regeneration potential." This is likely to create uncertainty for applicants and ultimately cause delays to the processing of planning applications within this area of the Borough.

We do not consider that the policy is consistent with national policy as The NPPF supports comprehensive planning but also emphasises flexibility and the need to significantly boost housing supply (NPPF paras 11, 60, 74). A blanket resistance to piecemeal development conflicts with this.

The NPPF (paras 68, 119–122) places strong emphasis on maintaining a sufficient supply of deliverable housing sites. The current policy wording risks undermining this by preventing otherwise suitable and deliverable parcels from coming forward in a timely manner.

Policy SGL 01 Part 5

We welcome Part 5 of Policy SGL 01 which supports tall buildings within Swindon's Central Area provided proposals meet the design quality and safety requirements set out in Policy SD5.

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.

Our proposed changes to the draft wording of Policy SGL 01 are set out in red text below. We note that the policy numbering is incorrect with the Number 3 being repeated. We have highlighted the proposed changes to the policy numbering in red.

Policy SGL 01 - Swindon's Central Area

1. Swindon's Central Area (as identified on the Policies Map) will play a fundamental role in the Borough's spatial strategy and is designated on the Policies Map as a 'strategic growth location', with the ambition to deliver up to 8,000 new homes and 6,000 new jobs, alongside a regenerated and vibrant main town centre environment, new leisure facilities and new social and cultural infrastructure. The Plan currently allocates sites for 4,347 homes in this area.
2. Proposals for development within Swindon Central Area will be expected to positively contribute towards its transformation into a bustling and thriving mixed-use urban heart that plays a regionally important commercial and leisure role and public transport interchange, where people live, work, shop and relax.
3. Proposals for development within Swindon's Central Area should support the following key place objectives, where applicable:
 - a) **A strong and varied retail core:** The continued success of Regent Street, The Parade and Canal Walk as key shopping streets with a variety of shops, cafés and eateries;
 - b) **New urban living:** The creation of new high-quality homes located above shops and around the retail core to establish a new mixed-use urban neighbourhood that will support a vibrant street environment and the vitality of the centre into the evening;
 - c) **A centre for business:** The creation of new, high-quality office floorspace within the Station Road and Fleming Way vicinity where the presence of regional and national headquarters can continue to grow, as part of a wider strategy to recentralise office uses into the Borough's most accessible and connected location;
 - d) **Station gateway:** High-quality development alongside the railway line and a regenerated station to provide a far more impressive first impression when arriving by train and opportunities to improve permeability across the railway line;
 - e) **Leisure, Live, Work and Learn Learning:** Establishing a new urban neighbourhood focused on health, wellbeing, residential living and job creation (including the introduction of data centres), and education to the north of the railway, with the Oasis and Swindon College acting as an established anchoring point for future development;
 - f) **Strengthen key routes:** as defined on the Policies Map, development along key central area routes will be expected to create a consistent and high-quality active frontage and uses that help support pedestrian movement;

- g) **Knit in green infrastructure:** development will be expected to provide green infrastructure and contribute to the Borough's Green Infrastructure Network;
 - h) **Respond positively to the historic environment:** through thoughtful reuse of existing heritage buildings and design responses that are informed by the area's rich industrial history and other heritage assets.
-
- 3. ~~(4) Proposals for major development are expected to identify and pursue opportunities to deliver coordinated schemes with neighbouring parcels and come forward through a comprehensive masterplan. Piecemeal development will be resisted in areas where wider regeneration potential has been identified~~ should demonstrate that they have considered opportunities for coordination with neighbouring parcels and, where practicable, contribute towards a comprehensive approach to regeneration. Where wider regeneration potential exists, schemes should not prejudice the ability of adjoining land to be delivered in a coordinated manner.
 - 4. (5) Proposals for development are expected to be of a scale and quantum that positively recognises the important transit hub role of Swindon's Central Area and its high levels of accessibility.
 - 5. (6) Tall buildings will be supported within the Central Area provided they meet the design quality and safety requirements set out in Policy SD5.
 - 6. (7) The Council is supportive of the redevelopment of car parks in Swindon's Central Area where proposals are able to demonstrate a lack of cumulative need.
 - 7. (8) Where appropriate, the Council will seek improvements to connectivity and green infrastructure. This includes the provision or enhancement of, or contribution towards, improved walking routes and the historic street network, green links, and cycling infrastructure.

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: 369

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

- Q1. Title

Mr
- Q2. First Name

Gerald
- Q3. Last Name

Sweeney
- Q4. Job Title (where relevant)

Director
- Q5. Organisation (where relevant)

CarneySweeney on behalf of SevenCapital (Swindon) Limited

[Redacted]

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[Redacted]

[Redacted]

[Redacted]

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

Local Plan Appendix 1: Site Allocations Evidence Base: 03.08 – New Site Allocations Breakdown SGL-01 – Swindon Central Area: New Sites We are fully supportive of the new site allocation 'Reference: 18-001 (North Star)' as listed within Appendix 1 of the 'Swindon Local Plan 2023 – 2043 Regulation 18 consultation draft' document which states that the site could accommodate 'residential, swimming pool and transitional employment land on a total site area of 12.88 hectares with an indicative constrained residential yield of 743 units'. By way of background, we would like to highlight that a series of planning applications have been submitted by CarneySweeny on behalf of SevenCapital (Swindon) Limited (our client) to Swindon Borough Council (SBC) seeking planning permission and listed building consent for a similar form of development that the site is allocated for in the Publication Stage (Regulation 18) Draft Local Plan. Details of the planning applications that have been submitted to the Council and their current status at the time of writing are set out below. - LPA Reference: S/OUT/24/1426 - Planning permission was refused on 24th of July 2025 for "Outline application for multi-storey residential development of up to 707 no. apartments to include car parking, associated public and residential amenity space, cycle parking facilities and outdoor play facilities, along with associated engineering and site clearance (Access not Reserved)". - LPA Reference: S/OUT/24/1427 – An application for outline planning permission was submitted to SBC on 9th December 2024 for "employment units (Use Class B8 (including Data Centres), B2 and or E (g) (iii)), along with all associated engineering and site clearance (Access not reserved)". - LPA Reference: S/24/1431 & S/LBC/25/0182– An application for full planning permission and Listed Building Consent was submitted to SBC on 11 December 2024 for "the re-ordering, demolition in part and construction of new building elements of the Oasis Leisure Centre including the associated site clearance, engineering works". The application was recommended for approval at Planning Committee on 8th July 2025. The Client and SBC are currently in discussions to agree the planning conditions and the S.106 Agreement. The Decision Notice has not been formally issued at the time of writing. The outline planning application for employment use ((Reference: S/OUT/24/1427) alongside the planning application and listed building consent (Reference: S/24/1431 & S/LBC/25/0182) seeking the refurbishment of the Grade II Listed Oasis Leisure Centre were recommended for approval at Planning Committee on 8th July 2025. The Client and SBC are in discussions to agree the planning conditions and the S.106 Agreement. Providing that planning permission and Listed Building Consent are formally approved by SBC, the development will deliver a mix of employment units falling within Use Class B2/B8/E(g)(iii) totalling 29,624 sqm (GIA) alongside sensitive upgrades and refurbishment works to the Grade II Listed Oasis Leisure Centre. This is in accordance with the development aspirations of the new site allocation 'Reference: 18- 001 (North Star)' within the draft Local Plan, with the exception of the delivery of residential units which was refused planning permission by SBC on 24th July 2025 (Reference: S/OUT/24/1426). We are fully supportive of the proposed mix of development uses in the new site allocation reference: 18- 001 and the indicative residential yield of 743 units. The North Star Site is an appropriate location to accommodate high density residential development as the site is located in a highly sustainable central location, being within walking distance from Swindon Town Centre, 500m from Swindon Railway Station and there a number of bus stops within 300m walking distance from the site. Furthermore, the proposed residential yield of 743 units will help Swindon to meet its significant housing requirement of 1,205 homes per year. Therefore, allocating a portion of the North Star site for residential use provides a deliverable and developable location that can contribute to meeting the Borough's need within the plan period. The northern parcel of the site is allocated for 'transitional employment land'. As stated within these representations, this parcel of the site is subject to a planning application seeking outline planning permission for employment units (Use Class B8 (including Data Centres), B2 and or E (g) (iii)) (Reference: S/OUT/24/1427). We fully support the approach and the terminology in the site allocation that allows for transitional employment land. This is a pragmatic and flexible that recognises the changing nature of the economy and land-use pressures in Swindon. Transitional employment land provides an important buffer between traditional industrial, and employment uses and less traditional uses that may come forward in the future. The terminology used in the site allocation allows future adaptation to a mixed-use. In summary, we welcome the mix of uses which are proposed for the North Star site allocation as the residential use will contribute towards meeting the Council's identified housing need on a site which is suitable for higher density housing than edge-of-town greenfield sites. In addition, the site is well located, available, and can be delivered within the plan period which is consistent with the NPPF's aim to focus growth in sustainable locations, make efficient use of land, and regenerate urban areas (Paragraph 36, 72, 129) The proposed mixed-use allocation is consistent with the Local Plan's objectives to focus development and growth in accessible locations, regenerate underutilised brownfield land, and reduce pressure on greenfield sites at the edge of the borough.

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

SBC admin note: Please see attached response for formatted text.

Representation Form

	<p style="text-align: center;">Swindon Borough Council Local Plan</p> <p style="text-align: center;">Publication Stage (Regulation 18) Draft Local Plan Representation Form</p>	<p>Ref:</p> <p>(For official use only)</p>
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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

<p>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.</p>
--

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	<input type="text"/>	<input type="text" value="Mr"/>
First Name	<input type="text"/>	<input type="text" value="Gerald"/>
Last Name	<input type="text"/>	<input type="text" value="Sweeney"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Director"/>
Organisation (where relevant)	<input type="text" value="SevenCapital (Swindon) Limited"/>	<input type="text" value=""/>
Address Line 1	<input type="text" value="c/o agent"/>	<input type="text" value=""/>
Line 2	<input type="text"/>	<input type="text" value=""/>
Line 3	<input type="text"/>	<input type="text" value=""/>
Line 4	<input type="text"/>	<input type="text" value=""/>
Post Code	<input type="text"/>	<input type="text" value=""/>
Telephone Number	<input type="text"/>	<input type="text" value=""/>
E-mail Address	<input type="text"/>	<input type="text" value=""/>

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

Other (please specify):

Part B – Please use a separate sheet for each representation

Name or Organisation:

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

Chapter	Appendix 1: Site Allocations, SGL 01 – Swindon Central Area: New Sites	Policies Map	Site Allocation Reference: 18-001 (North Star)	Evidence base document e.g. the Sustainability Appraisal	New Local Plan 03.08 - New site allocations breakdown
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If selecting chapter, please note policy number and paragraph number if applicable.

4. COMMENTS

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

Local Plan Appendix 1: Site Allocations Evidence Base: 03.08 – New Site Allocations Breakdown

SGL-01 – Swindon Central Area: New Sites

We are fully supportive of the new site allocation 'Reference: 18-001 (North Star)' as listed within Appendix 1 of the 'Swindon Local Plan 2023 – 2043 Regulation 18 consultation draft' document which states that the site could accommodate '*residential, swimming pool and transitional employment land on a total site area of 12.88 hectares with an indicative constrained residential yield of 743 units*'.

By way of background, we would like to highlight that a series of planning applications have been submitted by CarneySweeny on behalf of SevenCapital (Swindon) Limited (our client) to Swindon Borough Council (SBC) seeking planning permission and listed building consent for a similar form of development that the site is allocated for in the Publication Stage (Regulation 18) Draft Local Plan. Details of the planning applications that have been submitted to the Council and their current status at the time of writing are set out below.

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The outline planning application for employment use ((Reference: S/OUT/24/1427) alongside the planning application and listed building consent (Reference: S/24/1431 & S/LBC/25/0182) seeking the refurbishment of the Grade II Listed Oasis Leisure Centre were recommended for approval at Planning Committee on 8th July 2025. The Client and SBC are in discussions to agree the planning conditions and the S.106 Agreement.

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We are fully supportive of the proposed mix of development uses in the new site allocation reference: 18-001 and the indicative residential yield of 743 units. The North Star Site is an appropriate location to accommodate high density residential development as the site is located in a highly sustainable central location, being within walking distance from Swindon Town Centre, 500m from Swindon Railway Station and there a number of bus stops within 300m walking distance from the site. Furthermore, the proposed residential yield of 743 units will help Swindon to meet its significant housing requirement of 1,205 homes per year. Therefore, allocating a portion of the North Star site for residential use provides a deliverable and developable location that can contribute to meeting the Borough's need within the plan period.

The northern parcel of the site is allocated for '*transitional employment land*'. As stated within these representations, this parcel of the site is subject to a planning application seeking outline planning permission for employment units (Use Class B8 (including Data Centres), B2 and or E (g) (iii)) (Reference: S/OUT/24/1427). We fully support the approach and the terminology in the site allocation that allows for transitional employment land. This is a pragmatic and flexible that recognises the changing nature of the economy and land-use pressures in Swindon. Transitional employment land provides an important buffer between traditional industrial, and employment uses and less traditional uses that may come forward in the future. The terminology used in the site allocation allows future adaptation to a mixed-use.

In summary, we welcome the mix of uses which are proposed for the North Star site allocation as the residential use will contribute towards meeting the Council's identified housing need on a site which is suitable for higher density housing than edge-of-town greenfield sites. In addition, the site is well located, available, and can be delivered within the plan period which is consistent with the NPPF's aim to focus growth in sustainable locations, make efficient use of land, and regenerate urban areas (Paragraph 36, 72, 129)

The proposed mixed-use allocation is consistent with the Local Plan's objectives to focus development and growth in accessible locations, regenerate underutilised brownfield land, and reduce pressure on greenfield sites at the edge of the borough.

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 welcome the proposed new site allocation Reference: 18-001 (North Star) that proposes residential, swimming pool and transitional employment land on the site with an indicative constrained residential yield of 743 units. We consider that the word 'constrained' should be omitted from the description of the site allocation reference: 18-001 as it appears in Appendix 1. The site is located within a sustainable, central location where higher residential densities are supported, therefore the site is capable of accommodating up to 743 units.

Our proposed changes to the wording of the Site Allocation '18-001 (North Star)' as it appears within Appendix 1 of the Swindon Local Plan 2023 – 2043 Regulation 18 Consultation Draft and the Evidence Base Document '03.08 New Site Allocations Breakdown' is shown in red text below:

Appendix 1: Site Allocations

"This Plan proposes the allocation of 36 sites to meet Swindon's growth needs, as shown on the Policies Map and set out below:

SGL – 01 – Swindon Central Area: new sites

Reg 18 Site Allocation ref	Site Name	SLAA Site Cross Reference	Suggested use(s)	Gross Site Area (ha)	Indicative constrained residential yield	Supply Category
18-001	North Star	s0099b-Former Clares Site s0099c – North Star (Oasis Leisure Centre)	Residential + swimming pool + transitional employment land, including data centre use on the employment parcel.	12.88	743	New Site Allocation



Respondent No: 370

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

- Q1. Title

Mr
- Q2. First Name

Gerald
- Q3. Last Name

Sweeney
- Q4. Job Title (where relevant)

Director
- Q5. Organisation (where relevant)

CarneySweeney on behalf of SevenCapital (Swindon) Limited

[Redacted]

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[Redacted]

[Redacted]

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

Policy FE2: Industrial Land We are supportive of the Council's ambition to accommodate a net increase of 640,000 sqm of industrial and warehousing floorspace in the Borough across the Plan Period. The policy makes reference to designated Industrial Locations that are shown on the proposed policies map where light industrial uses, industrial/heavy uses, warehousing and distribution will be permitted and safeguarded. However, the policy wording does not clearly differentiate between the 'Industrial Locations' which are safeguarded for traditional employment uses and those which are 'New - Industrial Location (mixed-use transitional site)' allocations where a greater degree of flexibility in terms of permitted uses is applied by Policy FE2. The policy wording should make clear and specific reference to the type of 'Industrial Land' that each part of the policy relates to, rather than the blanket term 'Industrial Locations'. Part 4: We welcome Part 4 of the policy which permits Sui Generis development in 'Industrial Locations' providing the use aligns with the industrial purpose of the area. Allowing appropriate Sui Generis uses provides the necessary flexibility to enable sites to adapt to support modern employment, innovation, and economic growth. In addition, the policy ensures that underutilised or vacant industrial sites can remain productive, allowing sites to change in-line with market demands while retaining employment potential, which is essential for Swindon's economic competitiveness. This approach aligns with the NPPF, which encourages planning policies to support sustainable economic growth, flexible land use, and efficient utilisation of urban land (Paragraph 85-87). Part 5: We do not support Part 5 of the policy as it is currently drafted. It states that development proposals in 'Industrial Locations' should not result in a net loss of existing industrial or warehousing floorspace (B2 and B8 uses). The policy wording is vague and should specify whether this part of the policy is only applicable to the Industrial Locations which are shown to be 'Safeguarded' on the policies map or does this part of the policy also apply to Industrial Locations which are shown to be allocated as an 'Industrial Mixed-use, transitional site'. In addition to the above, we consider Part 5 of the policy too restrictive and lacking flexibility for changing economic and market conditions. As currently drafted, the wording limits opportunities to redevelop industrial land even when sites are no longer viable or suitable for employment use. This could lead to vacant or underused land that fails to contribute positively to Swindon's regeneration objectives. Part 6: We support the Council's approach to Part 6 of the Policy which permits temporary uses of empty buildings and vacant sites within Industrial Locations for a period of no more than three years, providing that the temporary use would help rejuvenate the industrial area. Temporary uses can bring activity to underutilised sites that may have otherwise remained vacant which would help to support local businesses. A temporary use of a site would also help to improve security, maintenance, and the attractiveness of industrial sites, making them more appealing for future long-term industrial or mixed-use development.

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SBC admin note: Please see attached response for formatted text.

Representation Form

	<p style="text-align: center;">Swindon Borough Council Local Plan</p> <p style="text-align: center;">Publication Stage (Regulation 18) Draft Local Plan Representation Form</p>	<p>Ref:</p> <p>(For official use only)</p>
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Part B – Your representation(s). Please fill in a separate Part B sheet for each representation you wish to make.

Part A

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Agent's Details (if applicable)

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

Title	<input type="text"/>	<input type="text" value="Mr"/>
First Name	<input type="text"/>	<input type="text" value="Gerald"/>
Last Name	<input type="text"/>	<input type="text" value="Sweeney"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Director"/>
Organisation (where relevant)	<input type="text" value="SevenCapital (Swindon) Limited"/>	<input type="text" value="CarneySweeney"/>
Address Line 1	<input type="text" value="C/O Agent"/>	<input type="text" value="██"/>
Line 2	<input type="text"/>	<input type="text" value="████████████████"/>
Line 3	<input type="text"/>	<input type="text" value="████████████████"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text" value="████████"/>
Telephone Number	<input type="text"/>	<input type="text" value="████████████████"/>
E-mail Address	<input type="text"/>	<input type="text" value="██"/>

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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?

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

Other (please specify):

Part B – Please use a separate sheet for each representation

Name or Organisation:

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

Chapter	Policy FE2: Industrial Land	Policies Map		Evidence base document e.g. the Sustainability Appraisal	
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If selecting chapter, please note policy number and paragraph number if applicable.

4. COMMENTS

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

Policy FE2: Industrial Land

We are supportive of the Council's ambition to accommodate a net increase of 640,000 sqm of industrial and warehousing floorspace in the Borough across the Plan Period. The policy makes reference to designated Industrial Locations that are shown on the proposed policies map where light industrial uses, industrial/heavy uses, warehousing and distribution will be permitted and safeguarded.

However, the policy wording does not clearly differentiate between the 'Industrial Locations' which are safeguarded for traditional employment uses and those which are 'New - Industrial Location (mixed-use transitional site)' allocations where a greater degree of flexibility in terms of permitted uses is applied by Policy FE2. The policy wording should make clear and specific reference to the type of 'Industrial Land' that each part of the policy relates to, rather than the blanket term 'Industrial Locations'.

Part 4:

We welcome Part 4 of the policy which permits Sui Generis development in 'Industrial Locations' providing the use aligns with the industrial purpose of the area. Allowing appropriate Sui Generis uses provides the necessary flexibility to enable sites to adapt to support modern employment, innovation, and economic growth. In addition, the policy ensures that underutilised or vacant industrial sites can remain productive, allowing sites to change in-line with market demands while retaining employment potential, which is essential for Swindon's economic competitiveness. This approach aligns with the NPPF, which encourages planning policies to support sustainable economic growth, flexible land use, and efficient utilisation of urban land (Paragraph 85-87).

Part 5:

We do not support Part 5 of the policy as it is currently drafted. It states that development proposals in 'Industrial Locations' should not result in a net loss of existing industrial or warehousing floorspace (B2 and B8 uses). The policy wording is vague and should specify whether this part of the policy is only applicable to the Industrial Locations which are shown to be 'Safeguarded' on the policies map or does this part of the policy also apply to Industrial Locations which are shown to be allocated as an 'Industrial Mixed-use, transitional site'.

In addition to the above, we consider Part 5 of the policy too restrictive and lacking flexibility for changing economic and market conditions. As currently drafted, the wording limits opportunities to redevelop industrial land even when sites are no longer viable or suitable for employment use. This could lead to vacant or underused land that fails to contribute positively to Swindon's regeneration objectives.

Part 6:

We support the Council's approach to Part 6 of the Policy which permits temporary uses of empty buildings and vacant sites within Industrial Locations for a period of no more than three years, providing that the temporary use would help rejuvenate the industrial area. Temporary uses can bring activity to underutilised sites that may have otherwise remained vacant which would help to support local businesses. A temporary use of a site would also help to improve security, maintenance, and the attractiveness of industrial sites, making them more appealing for future long-term industrial or mixed-use development.

5. Changes

Policy FE2

The wording throughout the policy should be amended to make specific reference to the type of 'Industrial Locations' that each part of the policy relates to. Our proposed changes to the policy wording as shown in red text.

Part 2:

"In designated Industrial Locations, as identified on the Policies Map, (not including 'Industrial Location (mixed-use transitional sites') the following use classes for industrial type activities will be permitted and safeguarded:

- a) Light industrial uses;*
- b) Industrial / heavy industrial uses;*
- c) Warehousing and distribution/Data Centres"*

Part 5:

"Development proposals in Industrial Locations that are safeguarded for Industrial uses, should not result in a net loss of existing industrial or warehousing floorspace (B2 and B8 uses) unless it can be demonstrated that:

- a) The site or premises is no longer suitable or viable for continued employment use, and this is supported by evidence of active marketing for at least 24 months;*
- b) The loss of the site will not undermine the overall supply or distribution of employment land within the Borough; and*
- c) The proposed alternative use would deliver clear planning benefits, such as regeneration, housing delivery, or community infrastructure."*

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: 371

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- Q1. Title Mr
- Q2. First Name Gerald
- Q3. Last Name Sweeney
- Q4. Job Title (where relevant) Director
- Q5. Organisation (where relevant) CarneySweeney on behalf of SevenCapital (Swindon) Limited

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]


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

HC1: Housing Tenures and Sizes We support Policy HC1, which seeks to ensure a balanced mix of housing tenures across Swindon. Providing an appropriate range of market, affordable, and specialist housing tenures is essential to meeting diverse local needs and supporting inclusive, sustainable communities. The policy's requirement for a proportion of affordable and mixed-tenure housing is consistent with national policy (NPPF paragraphs 61-63) and reflects the borough's evidence on housing need. It will help address affordability challenges, improve social integration, and create more resilient neighbourhoods. We welcome the flexibility within HC1 that allows for the tenure mix to be informed by site-specific viability and local demand evidence, ensuring deliverability while maintaining policy objectives. This approach is positively prepared, justified, and effective, striking a fair balance between housing need and development viability, and should be retained in the next version of the Local Plan.

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

SBC admin note: Please see attached response for formatted text.

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Please return to Swindon Borough Council by 23:59pm Monday 13th October 2025

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

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

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	<input type="text"/>	<input type="text" value="Mr"/>
First Name	<input type="text"/>	<input type="text" value="Gerald"/>
Last Name	<input type="text"/>	<input type="text" value="Sweeney"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Director"/>
Organisation (where relevant)	<input type="text" value="SevenCapital (Swindon) Limited"/>	<input type="text" value="CarneySweeney"/>
Address Line 1	<input type="text" value="c/o agent."/>	<input type="text" value="████████████████████"/>
Line 2	<input type="text"/>	<input type="text" value="██████████"/>
Line 3	<input type="text"/>	<input type="text" value="████████"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text" value="████"/>
Telephone Number	<input type="text"/>	<input type="text" value="████████"/>
E-mail Address	<input type="text"/>	<input type="text" value="██"/>

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

Other (please specify):

Part B – Please use a separate sheet for each representation

Name or Organisation:

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

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

4. COMMENTS

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

HC1: Housing Tenures and Sizes

We support Policy HC1, which seeks to ensure a balanced mix of housing tenures across Swindon. Providing an appropriate range of market, affordable, and specialist housing tenures is essential to meeting diverse local needs and supporting inclusive, sustainable communities. The policy's requirement for a proportion of affordable and mixed-tenure housing is consistent with national policy (NPPF paragraphs 61-63) and reflects the borough's evidence on housing need. It will help address affordability challenges, improve social integration, and create more resilient neighbourhoods.

We welcome the flexibility within HC1 that allows for the tenure mix to be informed by site-specific viability and local demand evidence, ensuring deliverability while maintaining policy objectives. This approach is positively prepared, justified, and effective, striking a fair balance between housing need and development viability, and should be retained in the next version of the Local Plan.

5. Changes

No changes proposed.