



Respondent No: 529

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Q1. Title Mr

Q2. First Name Samuel

Q3. Last Name Croft

Q4. Job Title (where relevant) Planning Manager

Q5. Organisation (where relevant) Hannick Developments Ltd

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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. Hannick Developments Ltd supports the Plan's overall vision of focusing growth within the urban area and at strategic locations such as the New Eastern Villages and Wichelstowe. However, the omission of sustainable extensions to key settlements, including Wroughton, reduces flexibility and places undue reliance on a limited number of large and complex sites. Land at Overtown, Wroughton represents a sustainable and logical location for growth. The site adjoins the settlement, benefits from good accessibility to local services, and can deliver a landscape-led and heritage-sensitive extension that provides housing, green infrastructure, and community benefits. Its allocation would diversify the housing supply, support local facilities, and strengthen delivery within the first five years of the plan period. Further justification and supporting evidence are provided in the accompanying Detailed Representations to the Swindon Borough Local Plan (Overtown, Wroughton), which should be read alongside this form.

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

The Plan should be modified to:

- Allocate land at Overtown, Wroughton for a new sustainable community guided by a landscape-led masterplan incorporating green infrastructure, heritage mitigation, and active travel connections;
- Update the housing trajectory to include Overtown as a deliverable and developable site contributing to early and sustained housing delivery; and
- Publish an updated Site Selection Topic Paper and Sustainability Appraisal assessing Overtown as a reasonable alternative consistent with NPPF paragraph 32 and Planning Practice Guidance. These changes would ensure the Local Plan is positively prepared, justified, effective, and consistent with national policy. For full supporting evidence and context, please refer to the accompanying Detailed Representations document submitted on behalf of Hannick Developments Ltd.



Swindon Borough Council

**Swindon Local Plan 2023 - 2043: Regulation 18
Consultation Draft**

Overtown Site

On behalf of Hannick Developments Ltd

October 2025

Executive Summary

Hannick Developments Ltd (“Hannick”) promotes land at Overtown, Wroughton for a new sustainable community delivering housing, green infrastructure, and supporting facilities for new and existing residents. The site adjoins Wroughton and offers the opportunity to deliver a landscape-led and heritage-sensitive extension to the settlement that contributes meaningfully to Swindon’s housing needs.

The proposal aligns with the objectives of the Swindon Borough Local Plan and the tests of soundness under NPPF paragraph 36, being positively prepared, justified, effective, and consistent with national policy. It supports the vitality of a sustainable rural settlement in accordance with NPPF paragraph 79 and contributes to a diverse and flexible housing supply consistent with NPPF paragraph 73.

Hannick seeks the allocation of land at Overtown, Wroughton as a new sustainable community, supported by an indicative framework for access, green infrastructure, and phasing.

1.0 Introduction

- 1.1 Hannick Developments Ltd (“Hannick”) welcomes the opportunity to submit representations to the Swindon Borough Local Plan 2023–2043 (Regulation 18). Hannick is a long-established regional housebuilder and land promoter with a successful track record of delivering high-quality housing developments across Wiltshire and Swindon.
- 1.2 These representations form part of a suite of submissions made by Hannick to the current Regulation 18 consultation, covering a number of sites within Swindon Borough that Hannick is promoting through the emerging Local Plan. Each submission relates to a specific land interest and has been prepared to assist the Council in developing a robust and deliverable strategy for growth across the plan period.
- 1.3 This document focuses specifically on land at Overtown, Wroughton, which Hannick is promoting for a new sustainable community providing housing, green infrastructure, and associated facilities. The site adjoins the existing settlement edge and represents a logical and deliverable location for future growth. The land is predominantly in agricultural use, bounded by hedgerows and crossed by existing public rights of way.
- 1.4 The site boundary is shown on Appendix O-A: Site Location Plan. These representations set out the planning justification for the site’s allocation and outline the principles that would guide its future development. Proportionate technical evidence addressing landscape, heritage, ecology, transport, and drainage will be provided at the Regulation 19 stage or as part of a subsequent planning application.

2.0 Site and Vision

2.1 The site lies to the south of Swindon, on the southern side of settlement of Wroughton. It comprises a series of agricultural fields enclosed by mature vegetation, creating a well-defined landscape framework. Its proximity to Wroughton's existing services, schools, and public transport makes it a sustainable location for development.

2.2 The vision for the site is to deliver a landscape-led and community-focused extension to Wroughton that provides a mix of homes supported by green corridors, recreational space, and improved pedestrian and cycle links. The site is located on the southern side of Wroughton in a contained landscape context. The masterplan will be landscape led, focusing new development within visually contained parcels and strengthening green structure to conserve the wider setting.

2.3 The key principles of development include:

- Focusing built form within visually contained parcels while retaining open land on sensitive edges;
- Creating a connected network of green infrastructure including public open space, ecological habitats, and nature-based SuDS;
- Enhancing accessibility through walking and cycling routes linking to the existing rights of way and village centre;
- Supporting a mix of homes, including affordable housing, consistent with identified needs;
- Providing opportunities for new community and recreational facilities that serve both new and existing residents.

2.4 The site offers a flexible and deliverable opportunity capable of contributing early in the plan period and sustaining supply thereafter. Its delivery can be phased to

align with infrastructure provision, helping to address identified shortfalls in the five-year housing land supply consistent with NPPF paragraph 78.

3.0 Planning Policy Context and Alignment

- 3.1 The draft Local Plan focuses growth within the urban area and at major strategic allocations such as NEV, Kingsdown, and Wichelstowe. While these form important parts of the housing strategy, they carry complex delivery risks and long lead-in times. Smaller and medium-sized sites at sustainable settlements such as Wroughton are essential to diversify supply and maintain delivery rates.
- 3.2 Wroughton functions as a large rural service centre, with a range of facilities including primary and secondary schools, shops, healthcare provision, and regular public transport services. Allocating additional land here would maintain the vitality of the settlement and align with NPPF paragraph 79, which supports proportionate rural growth to sustain local communities.
- 3.3 The proposed allocation at Overtown is consistent with the Local Plan's overarching objectives to boost housing delivery and enhance sustainability. It supports the NPPF's principles of making effective use of land (paragraph 119) and achieving well-designed, sustainable places that integrate housing, landscape, and infrastructure.
- 3.4 Allocation would also assist the Plan in meeting the tests of soundness at NPPF paragraph 36, ensuring it is positively prepared, justified, effective, and consistent with national policy.

4.0 Housing Requirement, Supply and the Role of Overtown

- 4.1 The Local Housing Needs Assessment 2025 identifies a minimum requirement of 24,100 dwellings across the plan period (1,205 dwellings per annum). The Plan

proposes provision of 25,500 dwellings, offering only a limited buffer above the minimum need.

- 4.2 Evidence from the Authority Monitoring Report 2024/25 and Five-Year Housing Land Supply Statement 2025 confirms that Swindon currently has a shortfall in deliverable housing supply. Large strategic sites such as NEV and Witchelstowe are delivering slower than anticipated, placing continued pressure on the Council's trajectory.
- 4.3 Allocating Overtown would provide an additional strategic but deliverable site capable of early housing completions and continued delivery through the plan period. The site's scale and relationship with Wroughton enable a phased approach that can respond flexibly to market conditions.
- 4.4 Its inclusion would ensure compliance with NPPF paragraph 73, which emphasises the importance of providing a range of sites, including small and medium-sized opportunities, to diversify housing delivery.

5.0 Access, Movement and Connectivity

- 5.1 Vehicular access to the proposed allocation can be achieved from Comet Way without significant engineering or environmental constraints, subject to detailed design and normal approvals. The scheme will deliver a safe and suitable access for all users and will provide walking and cycling connections to local destinations.
- 5.2 The development would prioritise safe pedestrian and cycle connections and public transport integration.
- 5.3 The site's proximity to existing services and its connectivity to Wroughton make it inherently sustainable, providing opportunities to reduce reliance on the private car and support active travel.

6.0 Landscape and Green Infrastructure

- 6.1 The site lies within the North Wessex Downs National Landscape. A sensitive and landscape-led masterplanning approach will ensure that development integrates within the topography, retains key views, and enhances landscape character.
- 6.2 Green infrastructure will be provided, including open space, green corridors, and new tree planting to create defensible boundaries and deliver biodiversity net gain. This approach aligns with NPPF paragraphs 174, 180, 182 and 185.
- 6.3 The landscape strategy will include opportunities for habitat creation, nature-based drainage, and enhancement of the public rights of way network, providing community and ecological benefits.

7.0 Heritage

- 7.1 The surrounding area includes heritage assets of local and national importance. A proportionate Heritage Impact Assessment will be prepared to assess potential effects and guide masterplanning.
- 7.2 Development will be located and designed to avoid harm to heritage significance. Any minor residual effects would be considered less than substantial harm and weighed against the public benefits in accordance with NPPF paragraphs 207 and 208.

8.0 Ecology and Biodiversity Net Gain

- 8.1 Baseline ecological surveys will be undertaken to inform a Biodiversity Net Gain Strategy.

8.2 The development will deliver a minimum 10% biodiversity net gain, exceeding statutory requirements and contributing to ecological connectivity across the site.

9.0 Flood Risk and Drainage

9.1 The site lies predominantly within Flood Zone 1 and is therefore at low risk of fluvial flooding.

9.2 A site-wide drainage strategy will incorporate sustainable drainage systems (SuDS) including infiltration, attenuation basins and swales, designed in accordance with NPPF paragraph 167.

10.0 Social Infrastructure and Placemaking

10.1 The proposed development will provide a mix of homes, including affordable housing, supported by new and enhanced community infrastructure.

10.2 The layout will incorporate high-quality public open space, play areas, and safe walking and cycling connections, ensuring that the scheme integrates with and supports Wroughton's existing community.

11.0 Sustainability Appraisal and Site Selection

11.1 The Interim Sustainability Appraisal accompanying the Regulation 18 draft focuses predominantly on urban intensification and large strategic sites. To be justified under NPPF paragraph 32, the Plan must demonstrate that all reasonable alternatives have been considered, including sustainable extensions to existing settlements such as Wroughton.

11.2 Hannick requests that the Council prepares an updated Site Selection Topic Paper to transparently assess Overtown as a reasonable alternative, consistent with PPG Plan-making (Ref. ID: 61-018-61-019).

12.0 Recommended Modifications

12.1 To ensure that the Local Plan is sound under NPPF paragraph 36, the following modifications are requested:

- Allocate land at Overtown, Wroughton for a new sustainable community. Development should be guided by a landscape-led masterplan that integrates green infrastructure, protects heritage assets, and provides new pedestrian and cycle links to Wroughton.
- Update the housing trajectory to include Overtown as a deliverable site contributing to early and sustained supply, consistent with NPPF paragraph 73 and PPG Housing Supply and Delivery (Ref. ID: 68-007).
- Publish a Site Selection Topic Paper and updated Sustainability Appraisal assessing Overtown as a reasonable alternative in accordance with NPPF paragraph 32.

13.0 Conclusions

13.1 The allocation of land at Overtown, Wroughton would strengthen the Local Plan's spatial strategy by providing a deliverable, landscape-led and sustainable extension to a well-served settlement.

13.2 The proposal aligns with the NPPF and Local Plan objectives to boost housing supply, diversify delivery, and enhance sustainability. Its allocation would ensure the Plan is positively prepared, justified, effective, and consistent with national policy.

APPENDICES

Appendix O-A – Overtown Site Plan



Appendix O-A: Heritage Constrained Areas Plan





Respondent No: 530

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Q1. Title Mr

Q2. First Name Samuel

Q3. Last Name Croft

Q4. Job Title (where relevant) Planning Manager

Q5. Organisation (where relevant) Hannick Developments Ltd

[REDACTED]

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

SBC admin note: Please also see attached response. Hannick Developments Ltd supports the Plan's overall vision to deliver sustainable growth but considers that the omission of sites at Stanton Fitzwarren weakens its flexibility and fails to make full use of sustainable opportunities adjoining the Swindon urban area. Land at Highworth Road and Land West of Trenchard Road, Stanton Fitzwarren, represent logical and well-contained extensions to the settlement, capable of accommodating approximately 230–240 dwellings in total. Both sites are available, achievable and deliverable within the plan period, with capacity to contribute to Swindon's five-year housing land supply and wider economic objectives. The inclusion of these sites would diversify housing supply, align residential and employment growth near South Marston Park, and enhance the Plan's soundness in accordance with paragraph 36 of the NPPF. Further details and supporting evidence are provided in the accompanying Detailed Representations to the Swindon Borough Local Plan (Stanton Fitzwarren), which should be read alongside this form.

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

The Plan should be modified to:

- Allocate Land at Highworth Road, Stanton Fitzwarren for residential and/or complementary mixed-use development of approximately 200 dwellings;
- Allocate Land West of Trenchard Road, Stanton Fitzwarren for residential development of approximately 30–40 dwellings; and
- Update the housing and employment trajectories and the evidence base (including the Site Selection Topic Paper and Sustainability Appraisal) to assess these sites as reasonable alternatives. These changes would ensure that the Local Plan is positively prepared, justified, effective and consistent with national policy, providing a more balanced and resilient strategy for housing and employment delivery across the Borough. For full justification, please refer to the accompanying Detailed Representations document submitted on behalf of Hannick Developments Ltd.



Swindon Borough Council

**Swindon Local Plan 2023 - 2043: Regulation 18
Consultation Draft**

Stanton Fitzwarren Sites

On behalf of Hannick Developments Ltd

October 2025

Executive Summary

Hannick Developments Ltd (“Hannick”) is promoting two parcels of land at Stanton Fitzwarren for development within the Swindon Borough Local Plan 2023–2043 (Regulation 18 Draft):

- **Land at Highworth Road**, Stanton Fitzwarren, promoted for residential, commercial or other alternative sustainable uses; and
- **Land West of Trenchard Road**, Stanton Fitzwarren, promoted for residential development.

Together, these sites represent logical, well-contained opportunities for growth adjacent to the existing settlement, with combined potential to deliver approximately 230–240 new homes, alongside green infrastructure and associated benefits in a sustainable location close to Swindon’s northern urban edge.

The proposals align with the tests of soundness in NPPF paragraph 36, being positively prepared, justified, effective, and consistent with national policy. They contribute to the diversity and flexibility of the Borough’s housing supply in accordance with NPPF paragraphs 73, 78, and 79.

This submission forms part of a suite of representations prepared by Hannick covering its land interests across the Borough. Each site has been promoted to assist the Council in delivering a balanced, deliverable, and resilient Local Plan.

1.0 Introduction

1.1 Hannick Developments Ltd welcomes the opportunity to comment on the Swindon Borough Local Plan 2023–2043 (Regulation 18 Draft). Hannick is a long-established regional developer and land promoter with a strong record of delivering sustainable and well-designed housing schemes across Swindon and the South West.

1.2 These representations relate specifically to two land interests at Stanton Fitzwarren, both of which present realistic and deliverable opportunities for development during the plan period:

- **Land at Highworth Road**, Stanton Fitzwarren, promoted for residential, commercial or other alternative sustainable uses; and
- **Land West of Trenchard Road**, Stanton Fitzwarren, promoted for residential development.

1.3 Both sites are well related to existing development and benefit from access to the established road network, local services, and employment opportunities around Stratton St Margaret and north Swindon, with combined capacity for approximately 230–240 dwellings across the two sites.

1.4 The boundaries of the sites are shown on Appendix SFA1 and SF1: Site Plans.

1.5 These representations form part of a wider suite of submissions made by Hannick in respect of its various land interests within the Borough. Each submission is intended to assist the Council in ensuring that the Local Plan is sound, positively prepared, and deliverable across a range of locations and site types.

2.0 Site Context and Opportunities

Land at Highworth Road, Stanton Fitzwarren

2.1 The site extends to approximately 10.9 hectares (26 acres) and lies immediately north of Stratton St Margaret and east of Stanton Fitzwarren. It comprises predominantly Grade 3 agricultural land, enclosed by established hedgerows and with direct frontage to Highworth Road.

2.2 The surrounding area features a mix of uses including residential development, employment land and renewable energy infrastructure, creating a transitional landscape between the urban edge of Swindon and the open countryside. Notably, the site lies opposite South Marston Park, one of Swindon's principal employment locations, providing an opportunity to deliver new homes in close proximity to existing jobs and services.

2.3 The site offers potential for a landscape-led mixed-use development accommodating around 200 dwellings, alongside opportunities for complementary or alternative sustainable uses that could support the local economy and reinforce the role of South Marston Park as a key employment hub. The site's scale, accessibility and containment make it well-suited to a well-designed, sustainable extension that would integrate with existing infrastructure while enhancing local green infrastructure networks.

Land West of Trenchard Road, Stanton Fitzwarren

2.4 The second site extends to approximately 2.2 hectares (5.5 acres) and is located on the western side of Trenchard Road, immediately adjoining the existing built form of Stanton Fitzwarren. The land comprises mainly Grade 4 agricultural land, bounded by mature vegetation which provides strong landscape containment and a defined edge to the settlement.

2.5 The site is capable of accommodating a modest, sensitively designed residential development of approximately 30 to 40 dwellings, which would respect the village's rural character while supporting its vitality and helping to meet local housing needs. Development here would represent a logical and proportionate extension to Stanton Fitzwarren, consistent with the NPPF's emphasis on supporting sustainable growth in rural communities.

3.0 Planning Policy Context and Alignment

3.1 Neither site is currently allocated in the adopted Swindon Local Plan 2026 nor identified in the Regulation 18 draft.

3.2 Both sites were considered in the 2025 SHELAA, which identified constraints relating to landscape and, for Trenchard Road, flood risk and heritage. However, these issues can be addressed through proportionate and site-specific mitigation at planning application stage.

3.3 The absence of allocations at Stanton Fitzwarren represents a missed opportunity for proportionate, sustainable growth within a well-connected rural settlement close to the Swindon urban area. Allocating these sites would help diversify the housing supply and provide early deliverable opportunities.

3.4 Allocations at Stanton Fitzwarren would support NPPF paragraph 79, which seeks to promote sustainable development in rural areas by locating housing where it will enhance or maintain the vitality of communities, and paragraph 73, which emphasises the importance of a range of sites to ensure choice and flexibility.

4.0 Housing and Employment Need

4.1 The Local Housing Needs Assessment (2025) identifies a minimum requirement of 24,100 dwellings (1,205 dwellings per annum) across the plan period. The

Plan's proposed supply of 25,500 dwellings provides only a limited buffer above this figure and remains heavily dependent on a small number of strategic and urban sites.

- 4.2 The Authority Monitoring Report (2024/25) confirms that the Borough currently has a housing land supply of approximately 4.9 years, below the five-year threshold required by paragraph 78 of the National Planning Policy Framework (NPPF). Additional deliverable and developable sites are therefore required to ensure flexibility and resilience within the trajectory.
- 4.3 The Employment Needs and Land Supply Study (March 2025) identifies an ongoing requirement for additional employment land, particularly for industrial and logistics uses, to meet business demand and support the Borough's long-term economic growth. In this context, the Highworth Road site lies opposite South Marston Park, an established employment location, offering the opportunity to bring forward housing adjacent to existing jobs and services. This proximity provides potential for complementary uses that could further support the local economy and reduce the need for longer-distance commuting.
- 4.4 Allocation of the Highworth Road site (circa 200 dwellings) would diversify supply and is capable of early commencement following allocation, enabling contributions within the five-year housing land supply period, subject to a timely application and standard pre-commencement approvals. The Trenchard Road site (circa 30–40 dwellings) also offers early delivery potential and could deliver initial completions within the first five years of the plan period, ensuring continuity of supply and supporting the Council's short-term housing trajectory.
- 4.5 Together, the Highworth Road and Trenchard Road sites would provide a balanced and scalable contribution to both housing and employment needs. They would strengthen the spatial strategy by aligning new residential growth with existing employment areas, enhancing accessibility, and promoting a more

sustainable pattern of development for Stanton Fitzwarren and the wider north-eastern edge of Swindon.

5.0 Environmental and Technical Considerations

- 5.1 Both sites are largely unconstrained and suitable for development subject to proportionate mitigation.
- 5.2 The Highworth Road site lies within Flood Zone 1 and benefits from strong boundary planting that would assist in integrating development within the landscape. The site's location adjacent to the A361 and A419 corridors ensures good accessibility to employment, services, and transport infrastructure.
- 5.3 The Trenchard Road site lies partly within Flood Zones 2 and 3, but development can be directed to areas of lower risk with SuDS incorporated to manage surface water. Built form would be set back from sensitive boundaries, with open space and planting used to reinforce visual containment and preserve the village edge.
- 5.4 Both sites offer significant opportunities for biodiversity net gain, through hedgerow enhancement, habitat creation, and new planting, consistent with NPPF paragraph 174.
- 5.5 Heritage considerations, particularly at Trenchard Road, can be addressed through layout design guided by a proportionate Heritage Impact Assessment, ensuring compliance with NPPF paragraphs 207–208.

6.0 Deliverability

- 6.1 Both land parcels are in single ownership and are available, achievable, and deliverable within the plan period.

- 6.2 Infrastructure connections, including access, utilities, and highway links, are available or can be readily achieved without major strategic intervention.
- 6.3 The sites can come forward either independently or in a coordinated manner, allowing for phased delivery of around 200 dwellings at Highworth Road and 30–40 dwellings at Trenchard Road. This approach would align with infrastructure provision and market demand, consistent with PPG Housing Supply and Delivery (Ref. ID: 68-007).

7.0 Sustainability and Accessibility

- 7.1 Stanton Fitzwarren benefits from proximity to Stratton St Margaret, Highworth, and north Swindon, providing access to schools, shops, healthcare, and employment areas. Bus services operate along Highworth Road and local routes connect to the wider public transport network.
- 7.2 Development at both sites would support sustainable travel and could deliver improvements to pedestrian and cycle connections, consistent with NPPF paragraphs 104–105 and 112.

8.0 Conclusion and Recommended Modifications

- 8.1 The allocation of Land at Highworth Road and Land West of Trenchard Road, Stanton Fitzwarren, would strengthen the Local Plan's deliverability and flexibility. Together, these sites could provide approximately 230–240 dwellings alongside new green infrastructure and biodiversity enhancements, supporting early housing delivery and offering scope for complementary uses that align with the Borough's economic objectives. The Highworth Road site, in particular, offers a strategic opportunity to deliver housing adjacent to South Marston Park, helping to integrate employment and residential development and support sustainable patterns of growth on the northern edge of Swindon.

- 8.2 Allocating these sites would diversify the Borough's housing supply, provide near-term delivery within the five-year housing land supply period, and assist in meeting both housing and employment needs in accordance with the National Planning Policy Framework. Development would be guided by landscape-led masterplanning, ensuring that new built form respects local character and delivers measurable biodiversity and infrastructure benefits.
- 8.3 Hannick therefore requests that the Swindon Borough Local Plan 2023–2043 be modified to include Land at Highworth Road and Land West of Trenchard Road, Stanton Fitzwarren, as sustainable and deliverable allocations. Their inclusion would enhance the Plan's overall soundness under NPPF paragraph 36 by ensuring it is positively prepared, justified, effective, and consistent with national policy.

APPENDICES

Appendix SFA1 - Highworth Road Site Plan



Appendix SFA2 - Trenchard Road Site Plan





Respondent No: 531

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Q1. Title **Mr**

Q2. First Name **Samuel**

Q3. Last Name Croft

Q4. Job Title (where relevant) Planning Manager

Q5. Organisation (where relevant) Hannick Homes & Developments Ltd

A 4x4 grid of 16 black bars of varying lengths on a white background. The bars are arranged in four rows and four columns. The lengths of the bars decrease from left to right and from top to bottom. The first bar in the top-left corner is the longest, and the last bar in the bottom-right corner is the shortest. The bars are black and have a uniform thickness.

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

SBC admin note: Please also see attached response. Hannick Homes & Developments Ltd supports the Plan's overall vision for sustainable growth but considers that the omission of Land at The Marsh, Wanborough undermines flexibility and does not reflect recent changes to the local context following completion of the Southern Connector Road (SCR). The site lies between the SCR and The Marsh and represents a logical, sustainable and well-contained opportunity for future housing growth on the edge of the New Eastern Villages (NEV). Development here could deliver approximately 120–150 dwellings within a landscape-led framework that supports biodiversity, green infrastructure and the long-term restoration of the Wilts & Berks Canal. Its inclusion would strengthen housing supply resilience, make efficient use of existing infrastructure, and support the eastern growth strategy in accordance with NPPF paragraphs 73 and 79. Further justification and technical detail are provided in the accompanying Detailed Representations to the Swindon Borough Local Plan (The Marsh, Wanborough), which should be read alongside this form.

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

The Plan should be modified to:

- Allocate Land at The Marsh, Wanborough for residential development (approximately 120–150 dwellings) within a landscape-led masterplan that integrates with the Southern Connector Road and the Wilts & Berks Canal corridor;
- Recognise the strategic importance of smaller, well-located sites adjacent to major growth areas in enhancing delivery flexibility and housing supply resilience; and
- Update the Site Selection Topic Paper and Sustainability Appraisal to assess The Marsh as a reasonable alternative consistent with NPPF paragraph 32. These modifications would ensure that the Local Plan is positively prepared, justified, effective and consistent with national policy, aligning growth with infrastructure delivery and environmental enhancement. For full evidence and reasoning, please refer to the accompanying Detailed Representations document submitted on behalf of Hannick Homes & Developments Ltd.



Swindon Borough Council

**Swindon Local Plan 2023 - 2043: Regulation 18
Consultation Draft**

The Marsh, Wanborough

On behalf of Hannick Homes & Developments Ltd

October 2025

Executive Summary

Hannick Homes & Developments Ltd (“Hannick”) is promoting Land at The Marsh, Wanborough, as a logical and sustainable location for future residential development on the southern edge of Swindon’s eastern growth area. The site occupies land between the Southern Connector Road (SCR) and The Marsh, benefitting from dual frontage and direct access opportunities. It represents one of the few remaining well-contained and accessible sites capable of supporting a proportionate level of housing growth alongside the New Eastern Villages (NEV) allocation.

The site could deliver approximately 120–150 dwellings supported by new green infrastructure, open space, and drainage features, contributing to Swindon’s housing need while reinforcing the settlement edge. Development would also support the Council’s long-term objective of safeguarding and re-establishing the Wilts & Berks Canal as a navigable waterway.

This submission forms part of a suite of representations by Hannick to the Swindon Borough Local Plan 2023–2043 (Regulation 18 Draft), focusing on ensuring the plan is positively prepared, justified, effective, and consistent with national policy as required by paragraph 36 of the National Planning Policy Framework (NPPF).

1.0 Introduction

- 1.1 Hannick Homes & Developments Ltd (“Hannick”) is promoting Land at The Marsh, Wanborough for residential development as a logical and sustainable future extension to the eastern growth area of Swindon, located between the Southern Connector Road (SCR) and The Marsh. The site benefits from direct frontage to both, offering a clear opportunity to integrate with planned and existing infrastructure and to contribute to the delivery of the safeguarded Wilts & Berks Canal route.
- 1.2 This representation forms part of a suite of submissions made by Hannick in response to the Swindon Borough Local Plan 2023–2043 Regulation 18 consultation, covering the company’s wider land interests across Swindon Borough.
- 1.3 The proposal accords with the tests of soundness set out in paragraph 36 of the National Planning Policy Framework (NPPF). Development of the site would help to meet identified housing needs, enhance green infrastructure, and support the long-term success and connectivity of the New Eastern Villages (NEV).
- 1.4 A site location plan is provided at Appendix M-A.

2.0 Site Context and Opportunities

- 2.1 The site occupies a sustainable location on the southern edge of Swindon’s planned growth area. It lies close to the New Eastern Villages allocation and forms part of a logical area for future expansion of the settlement pattern, supporting long-term housing delivery and infrastructure investment in this part of the Borough.
- 2.2 Development of the site would also support the restoration and enhancement of the Wilts & Berks Canal corridor, which runs immediately to the south, aligning

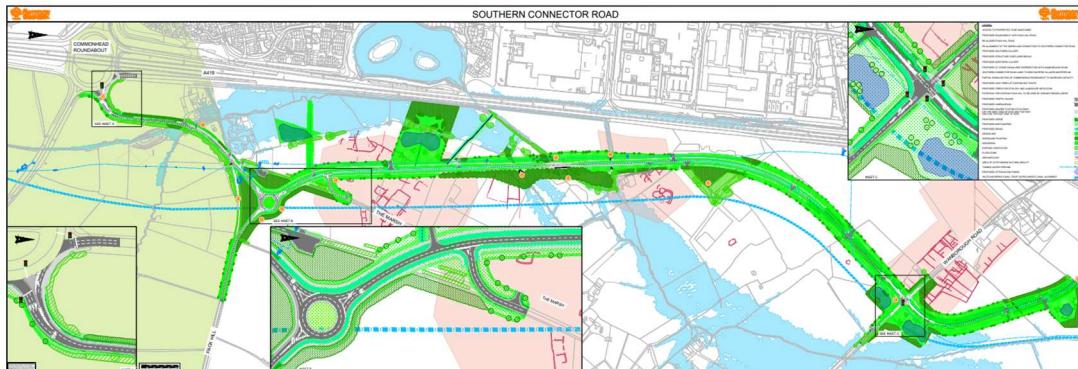
with the Council's ongoing objective of safeguarding the canal route and supporting its long-term re-establishment as a navigable waterway.

- 2.3 The land comprises open agricultural fields bounded by established hedgerows and vegetation. It is broadly level and visually well-contained by the SCR to the west and The Marsh to the east, providing a clear physical envelope for development. To the north, the site is bordered by existing fields that separate it from the southernmost extent of the NEV, while to the south lies the safeguarded canal corridor, creating opportunities for ecological enhancement and recreational connectivity.
- 2.4 The surrounding context includes emerging development associated with the NEV, existing rural properties, and key infrastructure links, making this an ideal location for a sensitively designed, landscape-led development that supports the Borough's spatial strategy while retaining separation from the historic core of Wanborough village.

3.0 Planning Policy Context and Alignment

- 3.1 The site is not currently allocated for development in either the adopted Swindon Local Plan 2026 or the Regulation 18 draft of the emerging plan. It lies close to, but outside, the New Eastern Villages allocation boundary and within an area identified as part of the non-coalescence zone under Policy NC3.
- 3.2 A well-designed scheme could maintain settlement separation while utilising existing and planned infrastructure to deliver sustainable growth. The 2025 Strategic Housing and Economic Land Availability Assessment (SHELAA) categorises the site and its surroundings as not currently suitable for development, referencing landscape and accessibility constraints.

3.3 However, the completion of the Southern Connector Road has fundamentally changed the accessibility context, improving local connectivity and making the site a viable development opportunity.



3.4 In policy terms, the site aligns with NPPF paragraph 73, which encourages local planning authorities to identify a range of sites to provide flexibility and deliverability throughout the plan period, and paragraph 79, which supports sustainable growth in well-located areas that reinforce existing communities and infrastructure.

3.5 The Local Plan should therefore be modified to include the Land at The Marsh, Wanborough, recognising its strategic location and contribution to housing supply resilience and infrastructure-led growth.

4.0 Housing Need, Supply and Deliverability

4.1 The Local Housing Needs Assessment (2025) identifies a minimum requirement of 24,100 dwellings (1,205 dwellings per annum) across the plan period. The Council's 2025 Five-Year Housing Land Supply Statement identifies a supply of only 4.9 years, below the requirement of paragraph 78 of the NPPF, meaning additional deliverable and developable sites are required to ensure a robust housing trajectory.

4.2 The emerging Local Plan continues to rely heavily on a limited number of large strategic sites, including the New Eastern Villages (NEV) and Wichelstowe, as well as complex regeneration-led allocations within Central Swindon. These central sites face significant delivery challenges, including fragmented land ownership, infrastructure dependencies, viability pressures, and the need for public sector intervention to enable delivery. In this context, introducing complementary, readily deliverable sites such as Land at The Marsh would enhance flexibility and resilience within the housing trajectory, ensuring that housing delivery can continue at a steady rate alongside, and not wholly dependent upon, these large-scale and urban regeneration schemes.

4.3 The site offers the potential to deliver around 120 to 150 dwellings, providing a meaningful but proportionate contribution to the Borough's housing need while supporting wider infrastructure and landscape objectives. Development would make efficient use of existing investment in the SCR, contribute to the restoration of the Wilts & Berks Canal corridor, and reinforce the sustainable transport framework for Swindon's eastern growth area.

4.4 The site is under the control of Hannick ensuring that it is available, suitable and achievable within the plan period. The land is free from ownership or legal constraints that would delay development. With appropriate masterplanning, the site could deliver early in the plan period and assist in maintaining a continuous housing land supply.

5.0 Environmental and Technical Considerations

5.1 The site lies largely within Flood Zone 1, with only limited areas potentially affected by surface water flow paths. Built development would be directed to the lowest risk parts of the site, with Sustainable Drainage Systems incorporated to manage runoff in accordance with paragraph 167 of the NPPF.

- 5.2 Baseline evidence indicates that the site comprises mainly improved grassland of low ecological value. Development could achieve at least a 10 per cent biodiversity net gain through hedgerow enhancement, habitat creation and integration with the canal corridor, consistent with the Environment Act 2021 and paragraph 186 of the NPPF.
- 5.3 The site is visually enclosed by existing vegetation and the SCR embankment. Its development would have limited visual impact on wider views and would form a logical, contained addition to the settlement pattern. A comprehensive landscape strategy could deliver new planting, open space and ecological connectivity.
- 5.4 There are Grade II listed buildings in the wider area, including Moat Cottage and Lake Cottage, though these are physically and visually separated from the site by intervening land and vegetation. A proportionate heritage assessment would ensure that potential effects are fully understood and mitigated.
- 5.5 The site benefits from dual frontage to both The Marsh and the SCR, providing multiple access options. This unique configuration allows for a highly deliverable access strategy, including safe vehicular entry, pedestrian links, and integration with the SCR's walking and cycling infrastructure, consistent with paragraphs 104 and 112 of the NPPF.

6.0 Recommended Modifications

- 6.1 To ensure that the Swindon Borough Local Plan 2023–2043 is sound and legally compliant, the following modifications are sought.
- 6.2 The plan should be amended to allocate Land at The Marsh, Wanborough for residential development, delivering approximately 120 to 150 dwellings within a landscape-led framework that reinforces the eastern edge of Swindon and

integrates with the Southern Connector Road and the Wilts & Berks Canal corridor.

- 6.3 The supporting text should acknowledge the contribution of smaller, well-located sites adjacent to major growth areas in providing flexibility and resilience to the Borough's housing supply.
- 6.4 The plan should recognise the strategic importance of the Wilts & Berks Canal as an environmental and recreational asset and confirm the Council's commitment to safeguarding its route and supporting its long-term restoration as a navigable waterway.
- 6.5 These modifications would ensure that the plan is positively prepared, justified, effective, and consistent with national policy, in accordance with paragraph 36 of the NPPF.

7.0 Conclusions

- 7.1 Land at The Marsh, Wanborough represents a logical and sustainable extension to the eastern growth area of Swindon. Although located outside the current NEV boundary, it is directly influenced by and well related to the NEV's infrastructure and spatial framework.
- 7.2 Development of the site would contribute to the delivery of new housing, enhance biodiversity and landscape character, and support the restoration and long-term safeguarding of the Wilts & Berks Canal.
- 7.3 The allocation of this site would ensure that the Swindon Borough Local Plan is positively prepared, justified, effective and consistent with national policy, in accordance with paragraph 36 of the NPPF.

7.4 Hannick therefore requests that the Swindon Borough Local Plan 2023–2043 be modified to include Land at The Marsh, Wanborough as a residential allocation, forming a natural and sustainable extension between The Marsh and the Southern Connector Road to reinforce the eastern growth strategy for Swindon.

APPENDICES

Appendix M-A - The Marsh Site Plan





Respondent No: 532

[REDACTED]
[REDACTED]
[REDACTED]

Q1. Title not answered

Q2. First Name Oliver

Q3. Last Name Murray

Q4. Job Title (where relevant) Sustainable Places Planning Advisor

Q5. Organisation (where relevant) Environment Agency

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

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

(SBC admin note: Please also see attached response.) Figure 2 in Chapter 4 provides an overview of the Strategic Growth Locations; however, it does not clearly label or distinguish each area, making it difficult to identify the precise extent of each development site. We recommend that the Plan updates Figure 2 to clearly label each Strategic Growth Location. Ideally, we would like to see watercourses also mapped on this figure, so the development boundary can be understood in relation to the surrounding hydrology and any potential impacts on nearby watercourses. While the Strategic Growth Location policies in Chapter 4 acknowledge the importance of green infrastructure corridors, they should more explicitly require the protection and proactive enhancement of natural watercourses and their associated riparian zones within each area. These features are essential for delivering sustainable development that supports climate resilience, biodiversity net gain, water quality, and overall environmental health. Development proposals within each Strategic Growth Location should integrate and protect existing watercourses and their functional floodplains as integral components of the multifunctional green and blue infrastructure network. This approach aligns with the Local Plan's broader objectives of fostering resilient ecologically rich and well-connected environments. Key watercourses relevant to each Strategic Growth Location should be clearly identified within the policy text and development proposals must demonstrate how these watercourses and their riparian corridors including floodplains and wetland habitats will be safeguarded and enhanced. We recommend referencing the specific watercourse protection policy (suggested wording provided under our comments for Policy CSE9: Managing Flood Risk), to ensure consistent robust environmental safeguards across all sites.

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

not answered



Respondent No: 533

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Oliver

Q3. Last Name Murray

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

(SBC admin note: Please also see attached response.) Our comments regarding site allocations are detailed in Chapter 4, where we highlight the necessity of clearly defining on-site watercourses in the descriptions for each strategic area. Additionally, we advocate for development management and designs to align with the watercourse protection policy.

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

not answered



Respondent No: 534

[REDACTED]

Q1. Title not answered

Q2. First Name Oliver

Q3. Last Name Murray

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

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

(SBC admin note: Please also see attached response.) While Policies CSE3 and CSE4 comprehensively address green infrastructure, they do not consistently include blue infrastructure within their scope. Although Policy CSE3 refers to blue features, the overall terminology and framework focus mainly on green infrastructure. Blue infrastructure such as rivers, streams, wetlands, sustainable drainage systems and other water-related features plays a critical role alongside green infrastructure in delivering multifunctional benefits. These include flood risk management, water quality improvement, biodiversity support and climate resilience. For clarity, consistency and to ensure comprehensive environmental planning, the policies should explicitly refer to Green and Blue Infrastructure throughout. This would reinforce the importance of integrating both natural land and water-based features within development design, management and strategic networks. We also recommend revising the policy titles, definitions and text to consistently reflect Green and Blue Infrastructure. This would better align with the Plan's vision and long-term strategic objectives for climate adaptation, natural asset protection and healthy, resilient communities by promoting integrated land and water management.

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: 535

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Oliver

Q3. Last Name Murray

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

(SBC admin note: Please see attached response.)

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

not answered

Part B – Please use a separate sheet for each representation

Name or Organisation:

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

Chapter	Policy CSE8	Policies Map	Evidence base document e.g. the Sustainability Appraisal
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If selecting chapter, please note policy number and paragraph number if applicable.

4. COMMENTS

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

The following is currently stated under point 1 of policy CSE8:

"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."*

The current wording could be misleading, as it may be interpreted to apply the 10% biodiversity net gain requirement solely to habitat units.

We suggest revising the wording to something along the lines of:

“Proposals for development (except where exemptions, modifications, or exclusions have been made by legislation) must demonstrate how they will achieve a minimum of 10% uplift in habitat, hedgerow, and watercourse units, measured using the latest Biodiversity Metric.”

Point 10 of CSE8 currently states:

"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."

Table 9 currently makes no reference to watercourse, waterbody or wetland habitat types, despite these being explicitly recognised under UK BAP / Section 41 as priority habitats, and among our most valuable for biodiversity, climate resilience, and natural flood management. We therefore recommend inserting either of the following rows into Table 9 to ensure that these important habitats are clearly captured.

Designation type	Site data
UK BAP / Section 41 Priority Habitats (including watercourses & waterbodies)	All UK priority habitat types, including rivers, streams, ditches, ponds, canals, and other standing or flowing waterbodies , along with their riparian zones, bankside vegetation and floodplain habitats; also including terrestrial & freshwater priority habitats such as lowland dry acid grassland; lowland calcareous grassland; upland calcareous grassland; lowland mixed deciduous woodland; wet woodland; traditional orchards; coastal & floodplain grazing marsh; lowland meadows; upland hay meadows; lowland raised bog; blanket bog; saltmarsh; reedbeds; purple moor-grass & rush pastures; inland rock, scree and limestone pavements; hedgerows; arable field margins; etc.

Or

Designation type	Site data
Watercourses, Waterbodies & Wetlands	Rivers, streams, ditches, ponds, lakes, canals, wetlands and associated floodplains and riparian habitat.



Respondent No: 536

[REDACTED]

[REDACTED]
[REDACTED]

Q1. Title not answered

Q2. First Name Oliver

Q3. Last Name Murray

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

(SBC admin note: Please also see attached response.) While Policy CSE9 includes welcome provisions on drainage, buffers, and culverting, it is currently framed narrowly around flood risk management. It does not fully reflect the multifunctional role of watercourses as natural assets that support biodiversity, landscape character, water quality, and climate adaptation, in addition to flood regulation. To address this, we recommend either: 1. Renaming and expanding Policy CSE9 to cover the full water environment, for example: Proposed new title: "CSE9 – Managing Flood Risk and the Protection and Enhancement of the Water Environment" OR 2. Introducing a separate, standalone policy specifically focused on watercourses and riparian corridors, in line with best practice adopted across the Thames catchment. Local plans from authorities such as Reading, South Oxfordshire, and Aylesbury Vale include dedicated watercourse policies, which have successfully supported the delivery of river restoration and ecological enhancement schemes through the planning system. "Protection and Enhancement of the Water Environment" Explicit protection and enhancement of river corridors would not only help address the widespread failure of local water bodies to meet good ecological status but support wider priorities of the Plan including biodiversity net gain, climate resilience and flood risk management. If Policy CSE9 is to be renamed and expanded as the main mechanism for managing development in and around watercourses, it should be amended to include a dedicated section focused on the protection and enhancement of river corridors, incorporating ecological principles and requirements. The existing points under the "Buffers" section could provide a foundation for this, but would benefit from further development to include biodiversity, connectivity, lighting impacts, and restoration opportunities. Further, the buffer provision for watercourses should be clearly stated in the plan. We request a 10-meter buffer as a standard. Whether incorporated into the existing policy or used to form a new standalone policy for watercourses and riparian corridors, we recommend wording along the lines of the following:

- "Planning permission will only be granted for development proposals which would not have an adverse impact on the functions and condition of any watercourse and its associated corridor.
- Development should seek to actively conserve and enhance the biodiversity, landscape and recreational value of the watercourse and its corridor through good design and to act upon opportunities to deliver WFD objectives.
- Development proposals adjacent to or containing a watercourse must provide or retain a buffer zone with a minimum width of 10 metres between the top of the bank and the development. This buffer provision applies to both sides of the watercourse and should be managed for long-term ecological benefit. Domestic gardens and formal landscaping should not be incorporated into the buffer zone. Only native species should be planted within the buffer zone, ideally of local genetic provenance. The buffer zone should be appropriately managed under a scheme agreed (in writing) by the council. This scheme will detail how the buffer zone is to be managed during and following construction, as well as detailing the responsible party(s).
- Where existing development encroaches into the 10-metre buffer zone, proposals for redevelopment or land use change should seek to re-establish an appropriately vegetated and ecologically functional 10-meter buffer. Opportunities to restore natural form and connectivity should be prioritised in line with the principles of biodiversity net gain and climate adaptation."
- All proposed artificial lighting within or adjacent to river corridors must be designed to avoid ecological harm. Lighting should be directional and shielded using cowls (or equivalent) to prevent light spill into the watercourse and buffer zone. In line with the 2023 Bats and Artificial Lighting at Night guidance, light levels in these areas should not exceed 2 lux to reflect natural nighttime conditions and prevent disruption to nocturnal species and fragmentation of wildlife corridors.
- Development proposals adjacent to or containing a watercourse will also be expected to pursue opportunities to enhance the physical habitat of the watercourse such as:

 - Restoring floodplain connectivity to improve natural flood storage and reduce flood risk
 - Introducing in-channel features like riffles, pools, and woody debris to promote flow diversity and habitat complexity
 - In areas where applicable, development initiatives should proactively seek to remove barriers (i.e., weirs) within the river channel or associated riparian corridor. The removal of these obstacles will alleviate threats to fish passage, to enhance the connectivity of the watercourse and ultimately support the movement and proliferation of aquatic life.
 - Proposals for hard engineering approaches to riverbank protection, such as sheet piling, will be discouraged. Soft engineering approaches should be used wherever possible.
 - New crossings over a watercourse should be clear span bridges, ensuring minimal disturbance to the natural flow and ecological network of the watercourse. Additionally, developments should strive to minimize the number of crossings proposed. This is essential to mitigate the potential fragmentation of the river corridor, which poses significant threats to wildlife passage and consequently conservation efforts.

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

not answered

Part B – Please use a separate sheet for each representation

Name or Organisation:

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

Chapter	Policy CSE9	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.

While Policy CSE9 includes welcome provisions on drainage, buffers, and culverting, it is currently framed narrowly around flood risk management. It does not fully reflect the multifunctional role of watercourses as natural assets that support biodiversity, landscape character, water quality, and climate adaptation, in addition to flood regulation.

To address this, we recommend either:

- 1. Renaming and expanding Policy CSE9** to cover the full water environment, for example:

Proposed new title:

“CSE9 – Managing Flood Risk and the Protection and Enhancement of the Water Environment”

OR

- 2. Introducing a separate, standalone policy** specifically focused on watercourses and riparian corridors, in line with best practice adopted across the Thames catchment. Local plans from authorities such as Reading, South Oxfordshire, and Aylesbury Vale include dedicated watercourse policies, which have successfully supported the delivery of

river restoration and ecological enhancement schemes through the planning system.

"Protection and Enhancement of the Water Environment"

Explicit protection and enhancement of river corridors would not only help address the widespread failure of local water bodies to meet good ecological status but support wider priorities of the Plan including biodiversity net gain, climate resilience and flood risk management.

If Policy CSE9 is to be renamed and expanded as the main mechanism for managing development in and around watercourses, it should be amended to include a dedicated section focused on the protection and enhancement of river corridors, incorporating ecological principles and requirements. The existing points under the "Buffers" section could provide a foundation for this, but would benefit from further development to include biodiversity, connectivity, lighting impacts, and restoration opportunities.

Further, the buffer provision for watercourses should be clearly stated in the plan. We request a 10-meter buffer as a standard.

Whether incorporated into the existing policy or used to form a new standalone policy for watercourses and riparian corridors, we recommend wording along the lines of the following:

- "Planning permission will only be granted for development proposals which would not have an adverse impact on the functions and condition of any watercourse and its associated corridor.
- Development should seek to actively conserve and enhance the biodiversity, landscape and recreational value of the watercourse and its corridor through good design and to act upon opportunities to deliver WFD objectives.
- Development proposals adjacent to or containing a watercourse must provide or retain a buffer zone with a minimum width of 10 metres between the top of the bank and the development. This buffer provision applies to both sides of the watercourse and should be managed for long-term ecological benefit. Domestic gardens and formal landscaping should not be incorporated into the buffer zone. Only native species should be planted within the buffer zone, ideally of local genetic provenance. The buffer zone should be appropriately managed under a scheme agreed (in writing) by the council. This scheme will detail how the buffer zone is to be

managed during and following construction, as well as detailing the responsible party(s).

- Where existing development encroaches into the 10-metre buffer zone, proposals for redevelopment or land use change should seek to re-establish an appropriately vegetated and ecologically functional 10-meter buffer. Opportunities to restore natural form and connectivity should be prioritised in line with the principles of biodiversity net gain and climate adaptation.”
- All proposed artificial lighting within or adjacent to river corridors must be designed to avoid ecological harm. Lighting should be directional and shielded using cowls (or equivalent) to prevent light spill into the watercourse and buffer zone. In line with the 2023 Bats and Artificial Lighting at Night guidance, light levels in these areas should not exceed 2 lux to reflect natural nighttime conditions and prevent disruption to nocturnal species and fragmentation of wildlife corridors.
- Development proposals adjacent to or containing a watercourse will also be expected to pursue opportunities to enhance the physical habitat of the watercourse such as:
 - Restoring floodplain connectivity to improve natural flood storage and reduce flood risk
 - Introducing in-channel features like riffles, pools, and woody debris to promote flow diversity and habitat complexity
- In areas where applicable, development initiatives should proactively seek to remove barriers (i.e., weirs) within the river channel or associated riparian corridor. The removal of these obstacles will alleviate threats to fish passage, to enhance the connectivity of the watercourse and ultimately support the movement and proliferation of aquatic life.
- Proposals for hard engineering approaches to riverbank protection, such as sheet piling, will be discouraged. Soft engineering approaches should be used wherever possible.
- New crossings over a watercourse should be clear span bridges, ensuring minimal disturbance to the natural flow and ecological network of the watercourse. Additionally, developments should strive to minimize the number of crossings proposed. This is essential to mitigate the potential fragmentation of the river corridor, which poses significant threats to wildlife passage and consequently conservation efforts.

- New development should actively pursue opportunities for de-culverting of watercourses. Planning permission will only be granted for proposals which do not involve the culverting of watercourses, and which do not prejudice future opportunities for de-culverting (i.e., building over existing culverts).

Where culverts exist and cannot be feasibly removed, proposals should look to install mammalian ledges within the structure to support otherwise hindered wildlife passage.



Respondent No: 537

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Oliver

Q3. Last Name Murray

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

(SBC admin note: Please also see attached response.) While Policy SD1 promotes the optimisation of land use, it would benefit from stronger emphasis on environmental factors, including the integration of natural features and consideration of environmental functions and constraints in site design and sustainability. Effective use of land should include the protection and integration of existing natural features that provide ecosystem services and contribute to wider environmental goals such as climate resilience, biodiversity net gain, and water quality. This is particularly important in areas that support sensitive or multifunctional habitats (i.e., land adjacent to watercourses, which can play a key role in flood mitigation, ecological connectivity, and the improvement of water quality). We recommend the inclusion of supporting text to reflect that: "Development proposals should demonstrate how they have incorporated existing environmental features into site layouts and design, and how they will deliver environmental enhancements appropriate to the local context, such as: • Retaining and enhancing riparian buffer zones alongside watercourses. • Integrating natural features such as mature trees, hedgerows, and wetlands into development layouts. • Avoiding the fragmentation of ecological corridors and supporting habitat connectivity. • Delivering multifunctional green and blue spaces that contribute to biodiversity, water management, and amenity."

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: 538

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Oliver

Q3. Last Name Murray

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

(SBC admin note: Please also see attached response.) Point G, "Knit in green infrastructure" should be expanded to read: "Knit in green and blue infrastructure: development will be expected to provide green and blue infrastructure and contribute to the Borough's Green and blue Infrastructure Network"

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

not answered

Part B – Please use a separate sheet for each representation

Name or Organisation:

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

Chapter	Policy SGL01	Policies Map	Evidence base document e.g. the Sustainability Appraisal	Level 1 SFRA
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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.

Point G, "*Knit in green infrastructure*" should be expanded to read:
"Knit in green **and blue** infrastructure: development will be expected to provide green **and blue** infrastructure and contribute to the Borough's Green **and blue** Infrastructure Network"

Part B – Please use a separate sheet for each representation

Name or Organisation:

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

Chapter	<input type="checkbox"/>	Policies Map	<input type="checkbox"/>	Evidence base document e.g. the Sustainability Appraisal	<input type="checkbox"/>	Level 1 SFRA
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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.

Level 1 SFRA

Sources of flooding

We welcome that all sources of flooding are included within the Level 1 SFRA in sections 6.1.4 and Table 6.1.

Modelling

We welcome that Swindon Borough Council has obtained all Environment Agency models we for the councils authoritative boundary, and have clearly provided information about them in Section 3.8.

Please can you provide us clarity with what modelling you are referring to for the River Cole and Dorcan Brook (Stream) in Section 3.8.3? If new modelling has been undertaken for the River Cole and Dorcan Brook (Stream) and you would like this to be incorporated into the Flood Map for Planning, please submit an

Evidence Review Request (ERR) to [REDACTED]

We will need to review your model to ensure it meets set requirements for it to be considered for use in our national flood risk products and is of acceptable quality. We will ask for amendments if this is not the case. You would also need to sign a data sharing agreement so that we can use your data in our published products, and possibly reshare with other customers. It can take several months to incorporate new evidence into our published products.

We also note that within the Executive Summary of the SFRA it states “particularly as future EA modelling – including ongoing work to remodel the River Cole – can affect future development planning decisions within the Borough.” Please can any reference to our modelling project be removed from the SFRA.

We welcome that as part of the SFRA, our models have been rerun to obtain flood extents allowing for potential climate change, based on the EA climate change allowances guidance discussed in Section 8. The climate change allowances referenced in Section 8 are for the Gloucestershire and Vale Management Catchment. Although this management catchment area predominantly covers Swindon Borough Council authoritative boundary, there are other management catchment areas within the boundary. Therefore, an explanation as to why this management catchment has been chosen, i.e. highest values of all management catchments that intersect Swindon's Borough Councils boundary, should be included within the Level 1 SFRA. There is also opportunity for our models to be run for the 3.3% annual exceedance probability (AEP) event to help assist with defining Flood Zone 3b. To assist with functional floodplain discussions we have produced the 'Rivers and Sea 3.3% defended flood risk extents - present day' layer. This is available on: [Defra Data Services Platform - Rivers and Sea 3.3% defended flood risk extents - present day - Details.](#)

As discussed above, if you would like Environment Agency approval for any updates to our modelling, this will need to be submitted as an ERR.

No detailed modelling/unmodelled watercourses

We welcome that within the Flood Zone 3b definition information is provided on what to do when there is no detailed modelling available.

We also welcome that section 3.8.6 references watercourses that have no Flood Zones and that hydraulic modelling would be required. As detailed above, we have identified 8 allocated sites to be in Flood Zone 1 but have unmodelled ordinary watercourses on site, that require further assessment. Where possible detailed modelling should be undertaken to better understand flood risk on these sites. Without further assessment, there is a risk that the at the planning application stage issues may arise such as detailed modelling showing increased risk on site than currently shown, historic flooding/local understanding of flooding may be discovered, leading to deliverability issues.

Historic Flooding

We welcome that the Environment Agency's historic flood map has been used to identify areas of flood risk. We would also recommend you use your own datasets and local knowledge regarding historic flood risk. Not all records of flooding are included within the historic flood map, such as flooding in Swindon in 2023. All records and local knowledge of historic flooding should be considered within the SFRA, including Section 19 reports.

Flood Zone 3b (functional floodplain)

We welcome that a definition of Flood Zone 3b has been provided in section 9.1.8. The NPPF defines that Flood Zone 3b as land "where water from rivers or the sea has to flow or be stored in times of flood", therefore we don't believe that the 1 in 30 surface water extent is suitable to be included within the Flood Zone 3b definition.

We welcome that maps have been provided showing Flood Zones (Figure 8A-D) and the functional floodplain (Figure 14A-D). We would recommend that these maps are provided at a more local scale as it is unclear the designations at the current scale provided.

Climate Change Allowances

We welcome that section 4.10 refers to the flood risk assessment climate change allowances (2022). As described above in the modelling section, the climate change allowances referenced in Section 8 are for the Gloucestershire and Vale Management Catchment. Although this management catchment area predominantly covers Swindon

Borough Council authoritative boundary, there are other management catchment areas within the boundary. Therefore, an explanation as to why this management catchment has been chosen, i.e. highest values of all management catchments that intersect Swindon's Borough Council's boundary, should be included within the Level 1 SFRA. We welcome that our models have been rerun for different climate change allowances. Please note, the future risk of climate change should be assessed for all watercourses, not just for watercourses that have detailed modelling. As part of the NaFRA2 project, Flood Zones plus Climate Change ([Flood Map for Planning - Flood Zones plus Climate Change](#)) have been provided to help planners and developers identify the need for a site-specific flood risk assessment and/or the sequential test. The dataset can also help to inform the preparation of strategic flood risk assessments.

Sequential test

We welcome that a Sequential and Exception Test statement has been provided as part of the evidence base for the Reg 18. The Sequential Test does not assess the risk of flooding from reservoirs. Within the Level 1 SFRA, it is identified that within Swindon Borough Council's authority boundary that there are 4 reservoirs, whereas in the Sequential Test it is stated that reservoir flooding is not applicable to Swindon Borough Council. The reservoir flood risk from the 4 identified reservoirs should be considered within the Sequential Test, in line with the Level 1 SFRA.

We welcome that within the Sequential Test future flood risk from climate change has been considered. As discussed in the climate change allowances section, the future risk of climate change should be assessed for all watercourses, not just for watercourses that have detailed modelling. As part of the NaFRA2 project, Flood Zones plus Climate Change ([Flood Map for Planning - Flood Zones plus Climate Change](#)) have been provided to help planners and developers identify the need for a site-specific flood risk assessment and/or the sequential test. The dataset can also help to inform the preparation of strategic flood risk assessments.

As described in the site allocations section of our response, we have also identified an additional 8 sites that are in Flood Zone 1 but have surface water flood risk associated with unmodelled ordinary watercourses. We would recommend the same proxies from the previous SFRA section 3.3.4 (dated May 2019) are included i.e. "For sections of main rivers and ordinary watercourses which are un-modelled, the Risk of Flooding from Surface Water and proximity to a watercourse are considered the most appropriate datasets to inform the Sequential Test."

Site-specific SFRA guidance

We welcome that site-specific guidance has been provided in section 9.3, including a suggested FRA contents.

The SFRA recommend Finished Floor Level to be set at a minimum of 300mm above the 1% AEP plus an appropriate allowance for climate change flood level (the 'design flood level'). To ensure the safety of a development's occupants, we advise that FFLs should be raised to a minimum of 600mm above the 1% AEP plus an appropriate allowance for climate change flood level (the 'design flood level'). Where there is a high confidence in the design flood level (for example, detailed modelling), then FFLs may be set a minimum of 300mm above this level. This is consistent with the [national guidance on preparing flood risk assessments](#). For developments identified as essential infrastructure, such as power stations or bridges, they will also be required to remain operational during the design flood event, and they should be designed to meet this criterion.

We welcome that Floodplain storage has been considered within the SFRA. Section 11.5.6 states that where it is not possible to provide floodplain compensation storage

through level for level open floodable areas and floodable voids are permitted. Paragraph 049 of PPG states stilts and voids 'should not normally be relied upon for compensating for any loss of floodplain storage'. Voids should only be used under exceptional circumstances for compensation, where all other options have been exhausted.

Safe access and egress

We welcome that the SFRA includes information about safe access, including flood hazard within section 11.7.

Cumulative impacts

The SFRA does not reference the cumulative impacts. We recognise that there are multiple planned developments within the same catchment area, including some significant land use change, and it is important to consider how all aspects of flood risk will be impacted.

Flood management and defences

We welcome that section 7 focuses on flood defences. However, other than section 7.1.5 it is unclear what defences are within Swindon Borough Council. We are aware of several flood defences and flood storage areas within the vicinity, including Haydon Wick. Information about all formal defences within Swindon Borough Council boundary should be provided. We would recommend that Swindon Borough Councils asset database is considered within the Level 1 SFRA. We are aware of several historic flood storage areas across the borough. Please can a list of the different defences/assets in the borough and their benefit (where known) be provided in the SFRA.

Within the local plan policy, it states that land that is likely to be needed for future flood risk management features and structures will be provided in Reg 19. We suggest this information is provided prior to the Reg 19 to ensure that any land safeguarded is appropriate.

Opportunities to reduce the causes and impacts of flooding

We welcome that the de-culverting of watercourses is included within the Level 1 SFRA. There is also opportunity to reduce the causes and impacts of flooding through Development Planning. There may also be opportunities to provide flood risk reduction and wider sustainability objectives through Natural Flood Management measures, which we are pleased to see referenced in the Level 1 SFRA.

We welcome that property flood resilience has been considered within section 11.4 of the SFRA.

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

5. CHANGES

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

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

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



Respondent No: 539

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Oliver

Q3. Last Name Murray

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

(SBC admin note: Please also see attached response.) We recommend the inclusion of supporting text along the following lines: "Development proposals within the New Eastern Villages shall demonstrate how they safeguard and enhance the key watercourses in the area, (such as the River Cole, Dorcan Stream, South Marston Brook and any other spatially relevant watercourses and associated riparian corridors), in accordance with the requirements set out in Policy X – Protection and Enhancement of the Water Environment."

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: 540

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Oliver

Q3. Last Name Murray

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

(SBC admin note: Please also see attached response.) We recommend the inclusion of supporting text along the following lines: "Development proposals within the Kingsdown Strategic Growth Location shall demonstrate how they safeguard and enhance the key watercourses in the area (such as the Bydemill Brook and any other spatially relevant watercourses and associated riparian corridors), in accordance with the requirements set out in Policy X – Protection and Enhancement of the Water Environment."

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: 541

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Oliver

Q3. Last Name Murray

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

(SBC admin note: Please also see attached response). We recommend the inclusion of supporting text along the following lines: "Development proposals within the Wichenstowe Strategic Growth Location shall demonstrate how they safeguard and enhance the key watercourses in the area, (such as the Elcombe Brook, River Ray, the South Swindon Green Trail watercourses and any other spatially relevant watercourses and associated riparian corridors), in accordance with the requirements set out in Policy X - Protection and Enhancement of the Water Environment."

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: 542

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Oliver

Q3. Last Name Murray

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

(SBC admin note: Please also see attached response.) We recommend the inclusion of supporting text along the following lines: "Development proposals within the East Wroughton Strategic Growth Location shall demonstrate how they safeguard and enhance the key watercourses in the area (such as the River Ray and any other spatially relevant watercourses and associated riparian corridors), in accordance with the requirements set out in Policy X – Protection and Enhancement of the Water Environment."

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: 543

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Oliver

Q3. Last Name Murray

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

(SBC admin note: Please also see attached response.) We recommend the inclusion of supporting text along the following lines: "Development proposals within the North Tadpole Strategic Growth Location shall demonstrate how they safeguard and enhance the key watercourses in the area (such as the River Ray and any other spatially relevant watercourses and associated riparian corridors), in accordance with the requirements set out in Policy X – Protection and Enhancement of the Water Environment."

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: 544

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Oliver

Q3. Last Name Murray

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

(SBC admin note: Please also see attached response.) We recommend the inclusion of supporting text along the following lines: "Development proposals within the Pipers Way Strategic Growth Location shall demonstrate how they safeguard and enhance the key watercourses in the area (such as the River Ray and any other spatially relevant watercourses and associated riparian corridors), in accordance with the requirements set out in Policy X – Protection and Enhancement of the Water Environment."

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: 545

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Oliver

Q3. Last Name Murray

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

(SBC admin note: Please also see attached response.) Policy CSE11 should be reworded to something similar to the below.

1. Proposals for development on land that is either contaminated, or is strongly suspected of being contaminated, shall only be approved when: a. a contaminated land site evaluation, investigation and risk assessment, completed in accordance with best practice guidelines, has been submitted and approved by the Local Planning Authority. This will identify and evaluate all contamination sources, pathways, receptors, and plausible contaminant linkages b. a remediation strategy and verification plan has been submitted and approved by the Local Planning Authority. This will outline all the remedial measures required to achieve an approved standard of land and water quality suitable for the proposed end uses c. a construction environment management plan (CEMP) has been submitted and approved by the Local Planning Authority. This will detail the steps and methods to be used to prevent any contaminants from being released and/or polluting any receptors, during and after construction d. appropriate measures are taken to ensure that migrating gas is safely dealt with where any development is proposed on land on or adjacent to an uncontrolled 'gassing' landfill site 1. It must be demonstrated by verification reporting of all remedial measures undertaken, that the completed development will not expose people, property, the environment, or any other receptors to contamination which would give rise to unacceptable risks or harm to health or other adverse impacts to receptors. As per the National Planning Policy Framework (NPPF), after remediation, the land should not be capable of being classified as 'contaminated land' under Part 2A of the Environmental Protection Act 1990. Where planning permission is granted, conditions may be imposed requiring the submission and approval of the reports outlined above.

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: 546

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Oliver

Q3. Last Name Murray

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

(SBC admin note: Please also see attached response.) There is a lack of policy committing to the improvement and maintenance of water quality or water resources. Policy CSE12 refers to the 'water environment' when talking about adverse impacts on receptors, but it would be good to see a standalone policy committing to improving and maintaining water quality. This could include wording around ensuring statutory environmental objectives are met (eg WFD). A similar policy ensuring the sustainable use of water resources would also be helpful.

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: 547

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Oliver

Q3. Last Name Murray

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

(SBC admin note: Please also see attached response.) With the rise in interest in river swimming, and more river designated bathing waters being applied for, it may be worth including some wording around that. If a site were to be designated in Swindon, the local authority would be responsible for it. We are not aware of any proposals for bathing waters in the Swindon patch, but it may happen in the future, so the LPA might want to consider adding it to 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.

not answered



Respondent No: 548

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Oliver

Q3. Last Name Murray

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

(SBC admin note: Please also see attached response.) • Include climate change scenarios in point a). Eg. "This should consider the impact of climate change on water supply and quality." • Include a policy referencing the delivery of WFD objectives and Environment Act Commitments to ensure that developments do not impact the ability to maintain them in future. Eg. "c) Demonstrate that growth will not prevent the delivery and maintenance of statutory targets including Water Framework Directive and Environment Act objectives."

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: 549

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Oliver

Q3. Last Name Murray

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

(SBC admin note: Please also see attached response.) The purpose of this chapter should be broadened to include identifying recently delivered and future water company commitments within the borough. For example, work schedules as part of this Asset Management Period (AMP) and the Water Industry National Environment Programme (WINEP) Section 5.1 Key Comments - Section 5.1 • The scope of STWs considered should be broadened to include all STW with a catchment area that falls within the local authority boundary. Include Shrivenham and Marlborough for consideration. • Similarly, growth outside of authority boundaries that impacts STW should be considered. Discuss with neighbouring authorities to include all growth predictions that will impact STW in Swindon Borough Council area. Section 5.2 Key Comments - Section 5.2 • The data used to inform this chapter is not representative of current DWF conditions at each site. (Table 5.2 (pg 90)). Request most recent data from Thames Water and use multiple years to build more detailed picture of growth impact. For example: Swindon STW & Highworth STW values are incorrect. • More information and more recent data should be considered when assessing capacity to deal with growth. This includes: • Delayed AMP7 schemes • Planned AMP8 schemes • Storm overflow data • New DWF permit requests already requested (Blunsdon STW) A range of future scenarios should be considered when assessing the impact of growth. This should include climate change and water company delivery scenarios. Additional Comments - Section 5.2 5.2.11 The infrastructure improvements set out in 2017 WCS report have not been delivered. 5.2.15 We would like see multiple scenarios considered regarding reduced water usage. It is possible that assumptions over-predict water usage reductions 5.2.14 Please provide more information about how this will be done. What calculations or modelling will be used to determine additional flow from growth. 5.2.24 Please provide more information about how this assessment will be done and using what tools. A number of future scenarios should be considered, including climate change. This should be done for all STWs in the authority boundary or impacted by growth within it. Section 5.3 Key Comments - Section 5.3 • Please check that Table 5.3 includes the most recent permit information and identify permits that will be changing as part of up-coming improvement schemes. • No deterioration should be assessed as well as load standstill. Assess the likelihood of in-permit deterioration of the receiving watercourse as a result of growth. Additional Comments - Section 5.3 5.3.1 This process does not automatically occur. Thames Water will need to apply for new permits and an assessment on what permit limits may be required to support growth should be done through this study to ensure that it is technical feasible to deliver project growth. Table 5.3 Correct TAL for Phosphorous is 0.25 mg/l 5.3.4 "Pollutant consents will also need to be revised to reflect the potential impacts of climate change" 5.3.5 Ensure that future permit changes (due to AMP8 schemes and DWF increase requests) are considered as part of this assessment 5.3.6 Provide more information about how this assessment will be done. What calculations or modelling will be used to determine changes in permit. Data in Table 5.2 is not up to date or representative of current condition and all STW will need to be assessed. Section 5.4 Key Comments - Section 5.4 • Some of the information included in this section is out of date. Update storm overflow data and request most recent updates regarding STW infrastructure from Thames Water. • Storm overflows at all STWs should be considered. Identify if sites that trigger Storm Overflow Assessment Framework (SOAF) investigations as well as Storm Overflow Reduction Plan (SORP) requirements. Assess the impact of growth on meeting SOAF & SORP objectives and maintaining them. Additional Comments – Section 5.4 5.4.3 Are Thames Water still committing to reduce storm overflows by 50% by 2030? 5.4.4 This statement is incorrect. It is already exceeding Q80 DWF 5.4.8 Reference that DWMP cycle 2 is being currently being consulted on. Table 5.5 Include other objectives set out as part of WFD, STORP, WINEP etc. 5.4.11 Check this delivery date. Thames Water may have updated information.

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: 550

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Oliver

Q3. Last Name Murray

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

(SBC admin note: Please also see attached response.) Key Comments – Chapter 6 • Demonstrate how the water cycle study will assess growths impact on WFD and ensure that it does not lead to deterioration of WFD status. This includes within status deteriorations. • Identify how this will be modelled and ensure that AMP7 and AMP8 improvement schemes are captured in baseline data to protect the quality expected after delivery Additional Comments – Chapter 6 6.4.14 Only RBMP measures included, reference other plans including Catchment plans Table 6.2 & 6.3 This shows the 2022 waterbody classification, which is the most up to date information at this time. Depending on when the Phase 2 study is done, please check if the 2025 classification data is available. Table 6.5 Check that this is the most recent information regarding WINEP schemes.

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: 551

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Oliver

Q3. Last Name Murray

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

(SBC admin note: Please also see attached response.) Level 1 SFRA Sources of flooding We welcome that all sources of flooding are included within the Level 1 SFRA in sections 6.1.4 and Table 6.1. Modelling We welcome that Swindon Borough Council has obtained all Environment Agency models we for the councils authoritative boundary, and have clearly provided information about them in Section 3.8. Please can you provide us clarity with what modelling you are referring to for the River Cole and Dorcan Brook (Stream) in Section 3.8.3? If new modelling has been has been undertaken for the River Cole and Dorcan Brook (Stream) and you would like this to be incorporated into the Flood Map for Planning, please submit an Evidence Review Request (ERR) to enquiries_THM@environment-agency.gov.uk. We will need to review your model to ensure it meets set requirements for it to be considered for use in our national flood risk products and is of acceptable quality. We will ask for amendments if this is not the case. You would also need to sign a data sharing agreement so that we can use your data in our published products, and possibly reshare with other customers. It can take several months to incorporate new evidence into our published products. We also note that within the Executive Summary of the SFRA it states "particularly as future EA modelling – including ongoing work to remodel the River Cole – can affect future development planning decisions within the Borough." Please can any reference to our modelling project be removed from the SFRA. We welcome that as part of the SFRA, our models have been rerun to obtain flood extents allowing for potential climate change, based on the EA climate change allowances guidance discussed in Section 8. The climate change allowances referenced in Section 8 are for the Gloucestershire and Vale Management Catchment. Although this

management catchment area predominantly covers Swindon Borough Council authoritative boundary, there are other management catchment areas within the boundary. Therefore, an explanation as to why this management catchment has been chosen, i.e. highest values of all management catchments that intersect Swindon's Borough Councils boundary, should be included within the Level 1 SFRA. There is also opportunity for our models to be run for the 3.3% annual exceedance probability (AEP) event to help assist with defining Flood Zone 3b. To assist with functional floodplain discussions we have produced the 'Rivers and Sea 3.3% defended flood risk extents - present day' layer. This is available on: Defra Data Services Platform - Rivers and Sea 3.3% defended flood risk extents - present day - Details. As discussed above, if you would like Environment Agency approval for any updates to our modelling, this will need to be submitted as an ERR. No detailed modelling/unmodelled watercourses We welcome that within the Flood Zone 3b definition information is provided on what to do when there is no detailed modelling available. We also welcome that section 3.8.6 references watercourses that have no Flood Zones and that hydraulic modelling would be required. As detailed above, we have identified 8 allocated sites to be in Flood Zone 1 but have unmodelled ordinary watercourses on site, that require further assessment. Where possible detailed modelling should be undertaken to better understand flood risk on these sites. Without further assessment, there is a risk that the at the planning application stage issues may arise such as detailed modelling showing increased risk on site than currently shown, historic flooding/local understanding of flooding may be discovered, leading to deliverability issues. Historic Flooding We welcome that the Environment Agency's historic flood map has been used to identify areas of flood risk. We would also recommend you use your own datasets and local knowledge regarding historic flood risk. Not all records of flooding are included within the historic flood map, such as flooding in Swindon in 2023. All records and local knowledge of historic flooding should be considered within the SFRA, including Section 19 reports. Flood Zone 3b (functional floodplain) We welcome that a definition of Flood Zone 3b has been provided in section 9.1.8. The NPPF defines that Flood Zone 3b as land "where water from rivers or the sea has to flow or be stored in times of flood", therefore we don't believe that the 1 in 30 surface water extent is suitable to be included within the Flood Zone 3b definition. We welcome that maps have been provided showing Flood Zones (Figure 8A-D) and the functional floodplain (Figure 14A-D). We would recommend that these maps are provided at a more local scale as it is unclear the designations at the current scale provided. Climate Change Allowances We welcome that section 4.10 refers to the flood risk assessment climate change allowances (2022). As described above in the modelling section, the climate change allowances referenced in Section 8 are for the Gloucestershire and Vale Management Catchment. Although this management catchment area predominantly covers Swindon Borough Council authoritative boundary, there are other management catchment areas within the boundary. Therefore, an explanation as to why this management catchment has been chosen, i.e. highest values of all management catchments that intersect Swindon's Borough Councils boundary, should be included within the Level 1 SFRA. We welcome that our models have been rerun for different climate change allowances. Please note, the future risk of climate change should be assessed for all watercourses, not just for watercourses that have detailed modelling. As part of the NaFRA2 project, Flood Zones plus Climate Change (Flood Map for Planning - Flood Zones plus Climate Change) have been provided to help planners and developers identify the need for a site-specific flood risk assessment and/or the sequential test. The dataset can also help to inform the preparation of strategic flood risk assessments. Sequential test We welcome that a Sequential and Exception Test statement has been provided as part of the evidence base for the Reg 18. The Sequential Test does not assess the risk of flooding from reservoirs. Within the Level 1 SFRA, it is identified that within Swindon Borough Council's authority boundary that there are 4 reservoirs, whereas in the Sequential Test it is stated that reservoir flooding is not applicable to Swindon Borough Council. The reservoir flood risk from the 4 identified reservoirs should be considered within the Sequential Test, in line with the Level 1 SFRA. We welcome that within the Sequential Test future flood risk from climate change has been considered. As discussed in the climate change allowances section, the future risk of climate change should be assessed for all watercourses, not just for watercourses that have detailed modelling. As part of the NaFRA2 project, Flood Zones plus Climate Change (Flood Map for Planning - Flood Zones plus Climate Change) have been provided to help planners and developers identify the need for a site-specific flood risk assessment and/or the sequential test. The dataset can also help to inform the preparation of strategic flood risk assessments. As described in the site allocations section of our response, we have also identified an additional 8 sites that are in Flood Zone 1 but have surface water flood risk associated with unmodelled ordinary watercourses. We would recommend the same proxies from the previous SFRA section 3.3.4 (dated May 2019) are included i.e. "For sections of main rivers and ordinary watercourses which are un-modelled, the Risk of Flooding from Surface Water and proximity to a watercourse are considered the most appropriate datasets to inform the Sequential Test.". Site-specific SFRA guidance We welcome that site-specific guidance has been provided in section 9.3, including a suggested FRA contents. The SFRA recommend Finished Floor Level to be set at a minimum of 300mm above the 1% AEP plus an appropriate allowance for

climate change flood level (the 'design flood level'). To ensure the safety of a development's occupants, we advise that FFLs should be raised to a minimum of 600mm above the 1% AEP plus an appropriate allowance for climate change flood level (the 'design flood level'). Where there is a high confidence in the design flood level (for example, detailed modelling), then FFLs may be set a minimum of 300mm above this level. This is consistent with the national guidance on preparing flood risk assessments. For developments identified as essential infrastructure, such as power stations or bridges, they will also be required to remain operational during the design flood event, and they should be designed to meet this criterion. We welcome that Floodplain storage has been considered within the SFRA. Section 11.5.6 states that where is it not possible to provide floodplain compensation storage through level for level open floodable areas and floodable voids are permitted. Paragraph 049 of PPG states stilts and voids 'should not normally be relied upon for compensating for any loss of floodplain storage'. Voids should only be used under exceptional circumstances for compensation, where all other options have been exhausted. Safe access and egress We welcome that the SFRA includes information about safe access, including flood hazard within section 11.7. Cumulative impacts The SFRA does not reference the cumulative impacts. We recognise that there are multiple planned developments within the same catchment area, including some significant land use change, and it is important to consider how all aspects of flood risk will be impacted. Flood management and defences We welcome that section 7 focuses on flood defences. However, other than section 7.1.5 it is unclear what defences are within Swindon Borough Council. We are aware of several flood defences and flood storage areas within the vicinity, including Haydon Wick. Information about all formal defences within Swindon Borough Council boundary should be provided. We would recommend that Swindon Borough Council's asset database is considered within the Level 1 SFRA. We are aware of several historic flood storage areas across the borough. Please can a list of the different defences/assets in the borough and their benefit (where known) be provided in the SFRA. Within the local plan policy, it states that land that is likely to be needed for future flood risk management features and structures will be provided in Reg 19. We suggest this information is provided prior to the Reg 19 to ensure that any land safeguarded is appropriate. Opportunities to reduce the causes and impacts of flooding We welcome that the de-culverting of watercourses is included within the Level 1 SFRA. There is also opportunity to reduce the causes and impacts of flooding through Development Planning. There may also be opportunities to provide flood risk reduction and wider sustainability objectives through Natural Flood Management measures, which we are pleased to see referenced in the Level 1 SFRA. We welcome that property flood resilience has been considered within section 11.4 of the SFRA.

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: 552

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Oliver

Q3. Last Name Murray

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

(SBC admin note: Please also see attached response.) We welcome that flood risk has been considered within Policy HC8, especially in relation to the vulnerability of caravans

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

In paragraph 3c) the use of 'area of high flood risk' is vague. We suggest the following wording 'are located outside of the 1% Annual Exceedance Probability (AEP) flood event including an appropriate allowance for climate change. There must be a safe route of access and escape that falls in the 'no danger to people' flood hazard risk rating.



Respondent No: 553

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Oliver

Q3. Last Name Murray

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

(SBC admin note: Please see attached response.)

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

not answered

Part B – Please use a separate sheet for each representation

Name or Organisation:

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

Chapter	<input type="checkbox"/>	Policies Map	<input type="checkbox"/>	Evidence base document e.g. the Sustainability Appraisal	<input type="checkbox"/>	Site Allocations
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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.

Site Allocations

We welcome that your flood risk evidence base includes a Level 1 SFRA and Sequential and Exception Test statement. As identified in your Sequential and Exception test statement section 1.1, where it is not possible for all sites to be located in Flood Zone 1, a Level 2 SFRA will be required to assess whether it is possible for sites at flood risk to be developed.

Your flood risk evidence base (Level 1 SFRA, Sequential Test and if needed Level 2 SFRA and Exception Tests) will be required at the Regulation 19 stage to ensure the plan is justified and therefore sound.

We welcome the inclusion of the proposed allocated sites within the Reg 18. We have identified, 13 sites to be in Flood Zones 2 or 3. We welcome that these sites have also been included within your Sequential and Exception test statement. As discussed above, these sites will require further assessment within the Level 2 SFRA.

We have also identified an additional 8 sites that are in Flood Zone 1 but have surface water flood risk associated with unmodelled ordinary watercourses. As identified in section 3.4.5 of your Level 1 SFRA, Flood Zones are typically not mapped for smaller catchments. The absence of mapped Flood Zones should not be assumed to indicate there is no fluvial flood risk.

The 8 sites we have identified to be in Flood Zone 1 but have unmodelled ordinary watercourses on site, require further assessment. Where possible detailed modelling should

be undertaken to better understand flood risk on these sites. Detailed modelling will be required at the planning application stage, which may show increased risk on site than currently shown, leading to deliverability issues. We also recommend updating your Level 1 SFRA to provide clearer instructions on how to handle sites with unmodelled watercourses for future uses.

We welcome that historic flooding has been included when considering flood risk to the sites. It is also important that Flood Zone 3b is identified within these sites in accordance with your SFRA to understand whether the site is acceptable in principle in relation to Table 2 of the PPG: Flood risk vulnerability and flood zone 'incompatibility'.

We have provided some summary comments that should be considered in your site assessments within your Level 2 SFRA for some of the key sites below:

Site Assessments:

- Appropriate climate change allowances used (central, higher central) as per NPPF recommendations.
- Use the most up to date information available (such as local modelling, developer modelling if available, or national modelling)
- New developments will not be located within FZ3b (except water-compatible uses or essential infrastructure developments). If a site is partly in FZ3b but you can demonstrate that no vulnerable development would be proposed in this Flood Zone, that may be sufficient to remove any soundness concerns we have with these site at the Reg 19 stage and beyond
- Development would be safe for its lifetime, including appropriate FFLs to design flood event level with at least 300mm of freeboard as well as the provision of safe access and egress (including an assessment of hazard)
- Development will not cause an increase in flood risk elsewhere. A high level assessment of the amount of development required on the site in comparison to the amount of the site at risk of flooding should be provided. This is to demonstrate floodplain storage would be safeguarded, to prevent increases in flood risk elsewhere. Any works that would impede flood flows should also be provided (such as from new/ altered bridges).

We acknowledge that for many of your proposed allocations, the areas on site at fluvial flood risk are limited. These sites are likely to be deliverable as long as the amount of development is restricted accordingly. Site assessments are still required with recommendations that can be pulled into the site specific policies, but the level of detail required in the assessments may be less than for sites at much greater risk of flooding.

For further information please see the attached spreadsheet which includes our comments on each site. The 21 sites therefore need to be included in your Level 2 SFRA in accordance with [How to prepare a strategic flood risk assessment - GOV.UK](#).

List of sites that will require individual reviews: (21 sites)

REG 18 site ref	Site name	NGR
18-011	Land to the west of South Marston	SU1888587516
18-012	Land at Meadow Cottage	SU1950587748
18-013	Great Stall West	SU1910186233

18-014	Upper Lotmead	SU1940385790
18-016	Land North of Kingsdown Lane	SU1543389658
18-018	Wichelstowe	SU1286782915
18-019	North Tadpole	SU1316191167
18-020	Land east of Swindon Road	SU1520681732
18-021	Berkley Farm	SU1534281164
18-022	Akers Land	SU1516080751
18-023	Land off Swindon Road	SU1481781787
18-027	Former Wroughton Park & Ride	SU1517382270
18-032	Land at 12 Turnpike Road	SU1515989734
18-033	Land west of Shaw Village Centre	SU1126585457
18-034	Newburn Sidings	SU1380184359
18-037	Kingsdown	SU1604189735
18-039	South Marston and Rowborough	SU2031587593
18-040	Great Stall East and Lotmead	SU2058486434
18-041	Green Land	SU2015885258
18-042	Foxbridge Village	SU1987284366
18-043	Redlands Village	SU2065984773

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

5. CHANGES

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

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

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

Area	REG 18 site ref	Site name	NGR	Page Number	Proposed uses	Flood Risk	Main River	FBG	IEP/ Sewage capacity	GWCL	WT Investigated sites	Water Mgmt	Planning History	Requirements	Opportunities
Swindon Central	18-001	North Star	SU1453685453		Resi (743) + swimming pool + transitional employment land	none	none	none	SWINDON	no aquifer, no SPZ		THM		No requirements. We agree with the sequential test that this site is within Flood Zone 1 and that there are no main rivers or ordinary watercourses on site that pose fluvial flood risk.	
	18-002	Land to the north of the Station	SU1473185262		Resi (1358) + transitional employment land	none	none	none	SWINDON	no aquifer, no SPZ. Railway adjacent to south		THM		No requirements. We agree with the sequential test that this site is within Flood Zone 1 and that there are no main rivers or ordinary watercourses on site that pose fluvial flood risk.	
	18-003	Swindon Station Quarter	SU1491985158		Station + resi (438) + offices	none	none	none	SWINDON	no aquifer, no SPZ, crosses railway line		THM		No requirements. We agree with the sequential test that this site is within Flood Zone 1 and that there are no main rivers or ordinary watercourses on site that pose fluvial flood risk.	
	18-004	Bristol St Car Park	SU1445384839		Resi (102)	none	none	none	SWINDON	no aquifer, no SPZ, railway to northwest		THM		No requirements. We agree with the sequential test that this site is within Flood Zone 1 and that there are no main rivers or ordinary watercourses on site that pose fluvial flood risk.	
	18-005	Farringdon Road Corner	SU1476384817		Resi (8)	none	none	none	SWINDON	no aquifer, no SPZ		THM		No requirements. We agree with the sequential test that this site is within Flood Zone 1 and that there are no main rivers or ordinary watercourses on site that pose fluvial flood risk.	
	18-006	Brunel Quarter	SU1480084705		Resi (1016) + town centre uses at GF	none	none	none	SWINDON	no aquifer, no SPZ		THM		No requirements. We agree with the sequential test that this site is within Flood Zone 1 and that there are no main rivers or ordinary watercourses on site that pose fluvial flood risk.	
	18-007	The Parade (excluding old Debenhams building)	SU1500284821		Resi (256) + town centre uses at GF	none	none	none	SWINDON	no aquifer, no SPZ		THM		No requirements. We agree with the sequential test that this site is within Flood Zone 1 and that there are no main rivers or ordinary watercourses on site that pose fluvial flood risk.	
	18-008	Regent Place and Princes St Car Park	SU1527284628		Resi (262) + retained Wyvern	none	none	none	SWINDON	no aquifer, no SPZ		THM		No requirements. We agree with the sequential test that this site is within Flood Zone 1 and that there are no main rivers or ordinary watercourses on site that pose fluvial flood risk.	
	18-009	Spring Gardens Car Park	SU1538584759		Resi (60)	none	none	none	SWINDON	no aquifer, no SPZ		THM		No requirements. We agree with the sequential test that this site is within Flood Zone 1 and that there are no main rivers or ordinary watercourses on site that pose fluvial flood risk.	
	18-010	Civic Campus	SU1538184607		Resi (115)	none	none	none	SWINDON	no aquifer, no SPZ		THM		No requirements. We agree with the sequential test that this site is within Flood Zone 1 and that there are no main rivers or ordinary watercourses on site that pose fluvial flood risk.	
New Eastern Villages	18-011	Land to the west of South Marston	SU1888587516		Resi (128)	FZ2 and 3 associated with main river	to north boundary, with ordinary watercourse to northwest	European water vole on site	SWINDON	secondary A bedrock and superficial aquifer. Historic landfill within site		THM		Further assessment required. This site is included twice in the Sequential Test statement, both in the Flood Zone 1 section and Flood Zone 3 section. This site requires the Sequential Test as Flood Zone 2 and 3 are within the site boundary. The main river and ordinary watercourse on site are modelled in national modelling. A site assessment will be required, this could include, but not limited to: using modelled data, assessing the impacts of climate change using appropriate climate change allowances, identifying Flood Zone 3b extents, flood resilience measures required, demonstrate that flood risk will not be increased elsewhere. For more information, please see our written response.	
	18-012	Land at Meadow Cottage	SU1950587748		Resi (16)	FZ2 and 3 to extreme edge.	MR 56m to west at closest point	none	SWINDON	Secondary A superficial aquifer, historic landfill 93m north.		THM		Further assessment required. As identified in the Sequential Test statement, this site is within Flood Zone 3. A site assessment will be required, this could include, but not limited to: using modelled data, assessing the impacts of climate change using appropriate climate change allowances, identifying Flood Zone 3b extents, flood resilience measures required, demonstrate that flood risk will not be increased elsewhere. For more information, please see our written response.	

	18-013	Great Stall West	SU1910186233		Resi (700) + retention of retail + transitional industrial land	FZ2 and 3 along main river	MR to southern boundary	"code 2"	SWINDON	unproductive aquifer		THM		Further assessment required. This site is included twice in the Sequential Test statement, both in the Flood Zone 1 section and Flood Zone 3 section. This site requires the Sequential Test as Flood Zone 2 and 3 are within the site boundary. The main river on site is modelled as part of the Cole EDA (A419 to South Marston Brook) 2011 model. A site assessment will be required, this could include, but not limited to: using modelled data, assessing the impacts of climate change using appropriate climate change allowances, identifying Flood Zone 3b extents, flood resilience measures required, demonstrate that flood risk will not be increased elsewhere. For more information, please see our written response.	
	18-014	Upper Lotmead	SU1940385790		Resi (850)	FZ2 and 3 to north and east, along MR, FZ2 extends into site	MRs to north, east and southern boundary,	"code 2"	SWINDON	unproductive, secondary A along course of main river		THM		Further assessment required. As identified in the Sequential Test statement, this site is within Flood Zone 3. A site assessment will be required, this could include, but not limited to: using modelled data, assessing the impacts of climate change using appropriate climate change allowances, identifying Flood Zone 3b extents, flood resilience measures required, demonstrate that flood risk will not be increased elsewhere. There is also an unmodelled ordinary watercourse on site. The fluvial flood risk from this unmodelled watercourse is unknown and therefore further assessment of fluvial flood risk is required. For more information, please see our written response.	
Kingsdown	18-015	Stubbs Hill Farm	SU1619290632		Resi (29)	none	none	none	SWINDON	secondary A bedrock aquifer				No requirements. We agree with the sequential test that this site is within Flood Zone 1 and that there are no main rivers or ordinary watercourses on site that pose fluvial flood risk.	
	18-016	Land North of Kingsdown Lane	SU1543389658		Resi (77)	none	none	none	SWINDON	secondary A bedrock aquifer		THM		Further assessment required. Although the site is in Flood Zone 1, as established in the Sequential Test statement, there is an unmodelled ordinary watercourse on site. The fluvial flood risk from this unmodelled watercourse is unknown and therefore further assessment of fluvial flood risk is required. For more information, please see our written response.	
	18-017	Kingsdown Lane Nursery	SU1635589543		Resi (64)	none	none	clawed crayfish area adjacent	SWINDON	secondary A bedrock aquifer		THM		No requirements. We agree with the sequential test that this site is within Flood Zone 1 and that there are no main rivers or ordinary watercourses on site that pose fluvial flood risk.	
Wichelstowe	18-018	Wichelstowe	SU1286782915		Resi-led (1620) mixed use	FZ2 and 3, follows MR through site.	MR flows south to north through site, other MR flows west to east at north of site. Other ordinary watercourses	European water vole on site, Bulthead 147m from site, SSSI 954m.	SWINDON	historic landfill on site, and 166m. Rail lines to west. Secondary A superficial aquifer.		THM	EA registered land within site boundary	Further assessment required. As identified in the Sequential Test statement, this site is within Flood Zone 3. A site assessment will be required, this could include, but not limited to: using modelled data, assessing the impacts of climate change using appropriate climate change allowances, identifying Flood Zone 3b extents, flood resilience measures required, demonstrate that flood risk will not be increased elsewhere. For more information, please see our written response.	
North Tadpole	18-019	North Tadpole	SU1316191167		Resi (513)	none	no MR, multiple ordinary watercourses	none	SWINDON	Small historic landfill at southwest of site, current landfill directly adjacent to west. Secondary A bedrock aquifer.		THM		Further assessment required. Although the site is in Flood Zone 1, as established in the Sequential Test statement, there is an unmodelled ordinary watercourse on site. The fluvial flood risk from this unmodelled watercourse is unknown and therefore further assessment of fluvial flood risk is required. For more information, please see our written response.	

East Wroughton	18-020	Land east of Swindon Road	SU1520681732		Resi (191)	none	no MR, ordinary w/c south to north at west boundary	none on site, European water vole area 86m to east	SWINDON	unproductive, Historic landfill 183m to west		THM		Further assessment required. Although the site is in Flood Zone 1, as established in the Sequential Test statement, there is an unmodelled ordinary watercourse on site. The fluvial flood risk from this unmodelled watercourse is unknown and therefore further assessment of fluvial flood risk is required. For more information, please see our written response.	
	18-021	Berkley Farm	SU1534281164		Resi (365)	none	no MR, ordinary w/c south to north through and adjacent to site	none	SWINDON	unproductive		THM		Further assessment required. Although the site is in Flood Zone 1, as established in the Sequential Test statement, there is an unmodelled ordinary watercourse on site. The fluvial flood risk from this unmodelled watercourse is unknown and therefore further assessment of fluvial flood risk is required. For more information, please see our written response.	
	18-022	Akers Land	SU1516080751		Resi (300)	none	No MR, ordinary w/c to west and east boundaries	none	SWINDON	unproductive		THM		Further assessment required. Although the site is in Flood Zone 1, as established in the Sequential Test statement, there is an unmodelled ordinary watercourse on site. The fluvial flood risk from this unmodelled watercourse is unknown and therefore further assessment of fluvial flood risk is required. For more information, please see our written response.	
	18-023	Land off Swindon Road	SU1481781787		Resi (175)	none	no MR, ordinary w/c to west	None	SWINDON	unproductive. Most of site on historic landfill		THM		Further assessment required. Although the site is in Flood Zone 1, as established in the Sequential Test statement, there is an unmodelled ordinary watercourse on site. The fluvial flood risk from this unmodelled watercourse is unknown and therefore further assessment of fluvial flood risk is required. For more information, please see our written response.	
URBAN REGENERATION AREAS: Marlowe Ave	18-024	Marlowe Ave Urban Regeneration area	SU1748685538		Resi-led (976) mixed use	none	MR 20m to north and 187m to west	"code 2"	SWINDON	mostly unproductive, sliver of Secondary A aquifer to north along main river route		THM		No requirements. We agree with the sequential test that this site is within Flood Zone 1 and that there are no main rivers or ordinary watercourses on site that pose fluvial flood risk.	
URBAN REGENERATION AREAS: Pipers Way	18-025	Intel Campus	SU1590882824		Resi (276)	none	none	deciduous woodland west of site	SWINDON	Secondary A bedrock aquifer, Historic landfill 93m to south				No requirements. We agree with the sequential test that this site is within Flood Zone 1 and that there are no main rivers or ordinary watercourses on site that pose fluvial flood risk.	
	18-026	Wakefield House	SU1611782608		Resi (228)	none	none	European water vole	SWINDON	Secondary A bedrock aquifer, historic landfill 102m west		THM		No requirements. We agree with the sequential test that this site is within Flood Zone 1 and that there are no main rivers or ordinary watercourses on site that pose fluvial flood risk.	
	18-027	Former Wroughton Park & Ride	SU1517382270		Resi (340)	FZ2/3 fraction to east of site, associated with ordinary watercourse	MR 98m to north	None	SWINDON	Unproductive bedrock aquifer across most of site, Secondary A superficial to northeast corner of site		THM		Further assessment required. As identified in the Sequential Test statement, this site is within Flood Zone 3. A site assessment will be required, this could include, but not limited to: using modelled data, assessing the impacts of climate change using appropriate climate change allowances, identifying Flood Zone 3b extents, flood resilience measures required, demonstrate that flood risk will not be increased elsewhere. There is also an unmodelled ordinary watercourse on site. The fluvial flood risk from this unmodelled watercourse is unknown and therefore further assessment of fluvial flood risk is required. For more information, please see our written response.	
OTHER NEW SITE ALLOCATIONS	18-028	Land at Pentylands Lane/Crane Furlong	SU2001193413		Resi (53)	none	none	European water vole	SWINDON	unproductive .		THM		No requirements. We agree with the sequential test that this site is within Flood Zone 1 and that there are no main rivers or ordinary watercourses on site that pose fluvial flood risk.	
	18-029	Land at Sams Lane	SU1560990467		Resi (115)	none	none	deciduous woodland east of site	SWINDON	Secondary A bedrock aquifer		THM		No requirements. We agree with the sequential test that this site is within Flood Zone 1 and that there are no main rivers or ordinary watercourses on site that pose fluvial flood risk.	
	18-030	Land south of Highworth Road	SU1519590054		Resi (89)	none	none	none	SWINDON	Secondary A bedrock aquifer		THM		No requirements. We agree with the sequential test that this site is within Flood Zone 1 and that there are no main rivers or ordinary watercourses on site that pose fluvial flood risk.	

	18-031	Land at Turnpike Road	SU1495989921		Resi (93)	none	none	none	SWINDON	Secondary A bedrock aquifer		THM		No requirements. We agree with the sequential test that this site is within Flood Zone 1 and that there are no main rivers or ordinary watercourses on site that pose fluvial flood risk.	
SU1453685453	18-032	Land at 12 Turnpike Road	SU1515989734		Resi (48)	none	none	none	SWINDON	Secondary A bedrock aquifer		THM		Further assessment required. Although the site is in Flood Zone 1, as established in the Sequential Test statement, there is an unmodelled ordinary watercourse on site. The fluvial flood risk from this unmodelled watercourse is unknown and therefore further assessment of fluvial flood risk is required. For more information, please see our written response.	
	18-033				F23	Main river and ordinary w/c	none		SWINDON	Secondary A superficial aquifer		THM		Further assessment required. As identified in the Sequential Test statement, this site is within Flood Zone 3. A site assessment will be required, this could include, but not limited to: using modelled data, assessing the impacts of climate change using appropriate climate change allowances, identifying Flood Zone 3b extents, flood resilience measures required, demonstrate that flood risk will not be increased elsewhere. For more information, please see our written response.	
	18-034	Land west of Shaw Village Centre	SU1126585457		Resi (6)	none	main river	deciduous woodland	SWINDON	unproductive. Railway to west		THM	see DPS 128848	Further assessment required. As identified in the Sequential Test statement, this site is within Flood Zone 3. A site assessment will be required, this could include, but not limited to: using modelled data, assessing the impacts of climate change using appropriate climate change allowances, identifying Flood Zone 3b extents, flood resilience measures required, demonstrate that flood risk will not be increased elsewhere. For more information, please see our written response.	
	18-035	Newburn Sidings	SU1380184359		Resi (203)	none	none	none	SWINDON	Secondary A bedrock aquifer		THM		No requirements. We agree with the sequential test that this site is within Flood Zone 1 and that there are no main rivers or ordinary watercourses on site that pose fluvial flood risk.	
	18-036	Vacant Bus depot	SU1529283948		Resi (40)	none	none	none	SWINDON	Secondary A bedrock aquifer		THM		No requirements. We agree with the sequential test that this site is within Flood Zone 1 and that there are no main rivers or ordinary watercourses on site that pose fluvial flood risk.	
	18-037	Site of former Whitbourne House care home	SU1714883982		Resi (37)	none	none	none	SWINDON	unproductive		THM		Further assessment required. Although the site is in Flood Zone 1, as established in the Sequential Test statement, there is an unmodelled ordinary watercourse on site. The fluvial flood risk from this unmodelled watercourse is unknown and therefore further assessment of fluvial flood risk is required. For more information, please see our written response.	
	18-038	Kingsdown	SU1604189735		Resi-led (1552) mixed use	none	None. Ordinary watercourses flow west to east across the site.	White clawed crayfish 134m east of site	SWINDON	Historick landfill 14m from site. Secondary A bedrock aquifer.		THM		No requirements. We agree with the sequential test that this site is within Flood Zone 1 and that there are no main rivers or ordinary watercourses on site that pose fluvial flood risk.	
	18-039	Kingsdown (Turnpike Road land)	SU1577289160		Resi (125)	none	none	none	SWINDON	secondary A bedrock aquifer		THM		Further assessment required. As identified in the Sequential Test statement, this site is within Flood Zone 3. A site assessment will be required, this could include, but not limited to: using modelled data, assessing the impacts of climate change using appropriate climate change allowances, identifying Flood Zone 3b extents, flood resilience measures required, demonstrate that flood risk will not be increased elsewhere. There is also an unmodelled ordinary watercourse on site. The fluvial flood risk from this unmodelled watercourse is unknown and therefore further assessment of fluvial flood risk is required. For more information, please see our written response.	
		South Marston and Rowborough	SU2031587593		Resi-led (2380) mixed use	FZ2 and 3 along river, largest area to south/middle of site	MR through site, multiple ordinary watercourses	Bullead, European water vole, white clawed crayfish	SWINDON	Historic landfill on site and 188m north, secondary A bedrock and superficial aquifer. Railway to south		THM			

Area	REG 18 site ref	Site name	NGR	XY	Page Number	Proposed uses	GWCL	WT investigated sites	Water Mgmt	Planning History	Requirements	Opportunities
STRATEGIC GROWTH LOCATIONS											NOTE: Commentary is indicative only and must be substantiated with investigation work	
Swindon Central	18-001	North Star	SU1453685453	414536 , 185453		Resi (743) + swimming pool + transitional employment land	no aquifer, no SPZ	LQ857 adj to west	THM		Potential for off-site contamination to have affected this site. Staged investigation needed.	Where needed, remediation will reduce existing impacts to controlled waters and other receptors
	18-002	Land to the north of the Station	SU1473185262	414731 , 185262		Resi (1358) + transitional employment land	no aquifer, no SPZ. Railway adjacent to south	LQ857 adj to west	THM		Potential for off-site contamination to have affected this site. Staged investigation needed.	Where needed, remediation will reduce existing impacts to controlled waters and other receptors
	18-003	Swindon Station Quarter	SU1491985158	414919 , 185158		Station + resi (438) + offices	no aquifer, no SPZ, crosses railway line	LQ857 adj to west. Near railway stn/line	THM		Potential for off-site contamination to have affected this site. Staged investigation needed.	Where needed, remediation will reduce existing impacts to controlled waters and other receptors
	18-004	Bristol St Car Park	SU1445384839	414453 , 184839		Resi (102)	no aquifer, no SPZ, railway to northwest	LQ869 to north. Near railway stn/line	THM		Potential for off-site contamination to have affected this site. Staged investigation needed.	Where needed, remediation will reduce existing impacts to controlled waters and other receptors
	18-005	Farringdon Road Corner	SU1476384817	414763 , 184817		Resi (8)	no aquifer, no SPZ	LQ1499 to south	THM		Potential for off-site contamination to have affected this site. Staged investigation needed.	Where needed, remediation will reduce existing impacts to controlled waters and other receptors
	18-006	Brunel Quarter	SU1480084705	414800 , 184705		Resi (1016) + town centre uses at GF	no aquifer, no SPZ	LQ1499	THM		Potential for on-site contamination. Staged investigation needed.	Where needed, remediation will reduce existing impacts to controlled waters and other receptors
	18-007	The Parade (excluding old Debenhams building)	SU1500284821	415002 , 184821		Resi (256) + town centre uses at GF	no aquifer, no SPZ	LQ1499 to south west	THM		Potential for off-site contamination to have affected this site. Staged investigation needed.	Where needed, remediation will reduce existing impacts to controlled waters and other receptors
	18-008	Regent Place and Princes St Car Park	SU1527284628	415272 , 184628		Resi (262) + retained Wyvern	no aquifer, no SPZ	NA	THM		Phase I Desk study report at a minimum.	
	18-009	Spring Gardens Car Park	SU1538584759	415385 , 184759		Resi (60)	no aquifer, no SPZ	LQ5788 to west	THM		Potential for off-site contamination to have affected this site. Staged investigation needed.	Where needed, remediation will reduce existing impacts to controlled waters and other receptors
	18-010	Civic Campus	SU1538184607	415381 , 184607		Resi (115)	no aquifer, no SPZ	NA	THM		Phase I Desk study report at a minimum.	
New Eastern Villages	18-011	Land to the west of South Marston	SU1888587516	418885 , 187516		Resi (128)	secondary A bedrock and superficial aquifer. Historic landfill within site	LQ819, LQ7717, LQ2080	THM		Potential for on-site contamination. Staged investigation needed.	Where needed, remediation will reduce existing impacts to controlled waters and other receptors

	18-012	Land at Meadow Cottage	SU1950587748	419505 , 187748		Resi (16)	Secondary A superficial aquifer, historic landfill 93m north.	LQ7707 is to the south	THM		Potential for off-site contamination to have affected this site. Staged investigation needed.	Where needed, remediation will reduce existing impacts to controlled waters and other receptors
	18-013	Great Stall West	SU1910186233	419101 , 186233		Resi (700) + retention of retail + transitional industrial land	unproductive aquifer	NA	THM		Groundwater is potentially shallow. Infiltration drainage may not be possible	Groundwater elevation monitoring may be required.
	18-014	Upper Lotmead	SU1940385790	419403 , 185790		Resi (850)	unproductive, secondary A along course of main river	NA	THM		Groundwater is potentially shallow. Infiltration drainage may not be possible	Groundwater elevation monitoring may be required.
	18-039	South Marston and Rowborough	SU2031587593	420315 , 187593		Resi-led (2380) mixed use	Historic landfill on site and 188m north, secondary A bedrock and superficial aquifer. Railway to south	This NGR is in the center of LQ7707	THM		Potential for on-site contamination. Staged investigation needed. Groundwater is potentially shallow. Infiltration drainage may not be possible	Where needed, remediation will reduce existing impacts to controlled waters and other receptors
	18-040	Great Stall East and Lotmead	SU2058486434	420584 , 186434		Resi-led (4050) mixed use	Secondary A superficial aquifer	NA	THM		Groundwater is potentially shallow. Adjacent to River Cole. Infiltration drainage may not be possible	Groundwater elevation monitoring may be required.
	18-041	Green Land	SU2015885258	420158 , 185258		Resi (275)	unproductive	NA			Groundwater is potentially shallow. Infiltration drainage may not be possible	Groundwater elevation monitoring may be required.
	18-042	Foxbridge Village	SU1987284366	419872, 184366		Resi-led (540) mixed use	unproductive	NA	THM		Groundwater is potentially shallow. Infiltration drainage may not be possible	Groundwater elevation monitoring may be required.
	18-043	Redlands Village	SU2065984773	420659, 184773		Resi (450)	unproductive	NA	THM		Groundwater is potentially shallow. Infiltration drainage may not be possible	Groundwater elevation monitoring may be required.
Kingsdown	18-015	Stubbs Hill Farm	SU1619290632	416192, 190632		Resi (29)	secondary A bedrock aquifer	NA			Phase I Desk study report at a minimum.	
	18-016	Land North of Kingsdown Lane	SU1543389658	415433, 189658		Resi (77)	secondary A bedrock aquifer	NA	THM		Phase I Desk study report at a minimum.	
	18-017	Kingsdown Lane Nursery	SU1635589543	416355, 189543		Resi (64)	secondary A bedrock aquifer	NA	THM		Phase I Desk study report at a minimum.	
	18-037	Kingsdown	SU1604189735	416041, 189735		Resi-led (1552) mixed use	Historick landfill 14m from site. Secondary A bedrock aquifer.	NA	THM		Potential for off-site contamination to have affected this site. Staged investigation needed.	Where needed, remediation will reduce existing impacts to controlled waters and other receptors
	18-038	Kingsdown (Turnpike Road land)	SU1577289160	415772, 189160		Resi (125)	secondary A bedrock aquifer	NA	THM		Phase I Desk study report at a minimum.	

Wichelstowe	18-018	Wichelstowe	SU1286782915	412867, 182915		Resi-led (1620) mixed use	historic landfill on site, and 166m. Rail lines to west. Secondary A superficial aquifer.	NA	THM	EA registered land within site boundary.	Potential for on-site contamination. Staged investigation needed. Groundwater is potentially shallow. Infiltration drainage may not be possible	Where needed, remediation will reduce existing impacts to controlled waters and other receptors
North Tadpole	18-019	North Tadpole	SU1316191167	413161, 191167		Resi (513)	Small historic landfill at southwest of site, current landfill directly adjacent to west. Secondary A bedrock aquifer.	NA	THM		Potential for on-site contamination. Staged investigation needed. Groundwater is potentially shallow. Infiltration drainage may not be possible	Where needed, remediation will reduce existing impacts to controlled waters and other receptors
East Wroughton	18-020	Land east of Swindon Road	SU1520681732	415206, 181732		Resi (191)	unproductive. Historic landfill 183m to west	NA	THM		Potential for off-site contamination. Staged investigation needed. Groundwater is potentially shallow. Infiltration drainage may not be possible	Where needed, remediation will reduce existing impacts to controlled waters and other receptors
	18-021	Berkley Farm	SU1534281164	415342, 181164		Resi (365)	unproductive	NA	THM		Phase I Desk study report at a mimimum.	
	18-022	Akers Land	SU1516080751	415160, 180751		Resi (300)	unproductive	NA	THM		Phase I Desk study report at a mimimum.	
	18-023	Land off Swindon Road	SU1481781787	414817, 181787		Resi (175)	unproductive. Most of site on historic landfill	NA	THM		Potential for on-site contamination. Staged investigation needed. Infiltration drainage may not be possible	Where needed, remediation will reduce existing impacts to controlled waters and other receptors
URBAN REGENERATION AREAS												
Marlowe Ave	18-024	Marlowe Ave Urban Regeneration area	SU1748685538	417486, 185538		Resi-led (976) mixed use	mostly unproductive, sliver of Secondary A aquifer to north along main river route	LQ 6350, LQ1988, LQ850, LQ5738. LQ1739 surrounding this site.	THM		Potential for off-site contamination. Staged investigation needed. Infiltration drainage may not be possible	Where needed, remediation will reduce existing impacts to controlled waters and other receptors
Pipers Way	18-025	Intel Campus	SU1590882824	415908, 182824		Resi (276)	secondary A bedrock aquifer. Historic landfill 93m to south	Mapped as WORKS. LQ2009 to east.			Potential for on-site contamination. Staged investigation needed. Infiltration drainage may not be possible	Where needed, remediation will reduce existing impacts to controlled waters and other receptors
	18-026	Wakefield House	SU1611782608	416117, 182608		Resi (228)	Secondary A bedrock aquifer, historic landfill 102m west	Site is in the center of LQ2009	THM		Potential for on-site contamination. Staged investigation needed. Infiltration drainage may not be possible	Where needed, remediation will reduce existing impacts to controlled waters and other receptors
	18-027	Former Wroughton Park & Ride	SU1517382270	415173, 182270		Resi (340)	Unproductive bedrock aquifer across most of site, Secondary A superficial to northeast corner of site	Park and Ride site. No investigated sites for this location	THM		Phase I Desk study report at a mimimum.	



Respondent No: 554

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Barbara and Kevin

Q3. Last Name Parry

Q4. Job Title (where relevant) Ward Councillors

Q5. Organisation (where relevant) Covingham and Dorcan

[REDACTED]

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

(SBC admin note: Late submission) I had a problem with me email so I am sending this again in a new email in the hope you receive it. Barbara and I are concerned with the local plan as followed. Over development The impact on local schools like Dorcan Academy The impact on Covingham, Coleview Dorcan Way roads. Flooding in the Covingham and Dorcan Ward. Lack of GP surgery spaces Lost od Green open spaces Impact of the hospital Kind regards,

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: 555

1000

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title _____ Mr _____

Q2. First Name Alex

Q3. Last Name Hawtin

Q4. Job Title (where relevant) Associate Director

Q5. Organisation (where relevant) Lichfields on behalf of Eliot Baker of Reedhawk Ltd

A 7x2 grid of horizontal black bars. The bars in each row are of different lengths, representing data values for different categories. The bars in the first and last rows are the longest, while the bars in the middle rows are shorter.

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

Background Reedhawk Ltd (Reedhawk) has land interests at Regent Circus, the former shopping centre within Swindon's Town Centre. The site provides an opportunity to deliver town centre rejuvenation through the delivery of new homes on these sites and will increase urban housing density as set out within Chapter 3 of the Local Plan. Reedhawk supports the identification of the Town Centre as a Sustainable Development Location, which has a wide range of services and facilities to help support growth without significant infrastructure requirements. By its nature, it is a sustainable location, and the Regent Circus site is within walking distance of both Swindon's railway and bus stations. Diversification of the Town Centre is needed to support SBC's 'whole place' approach with increased residential presence required to support the retail, employment and commercial functions of the Town Centre and bring vibrancy to the area. Reedhawk also supports the identification of Urban Regeneration Areas, including Pipers Way, as locations that can utilise previously developed land to deliver regeneration and contribute to the growth requirements set out in the plan. Reedhawk would, however, welcome clarity on the terminology set out within Policy SS1, the accompanying policies and the policies map. Policy SS1 refers to 'Sustainable Development Locations' whilst the Policies Map identifies 'Sustainable Growth Areas' and 'Sustainable Growth Corridors', despite appearing to be the same designation. Terminology should be consistent.

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

Either the Policies Map or Policy SS1 is updated so that terminology is consistent with each other.



Respondent No: 556

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title Mr

Q2. First Name Alex

Q3. Last Name Hawtin

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

Reedhawk raises concern that Policy SS2 is inconsistent with Policy SS1. Table 1 doesn't identify the elevated policy-position of the Town Centre or the Central Area or consider the significant range of services and facilities as well as existing transport hubs. The Urban Area is instead grouped as one which indicates that equal status would be given to proposals within the Urban Area, no matter whether they are in the Central Area, the Town Centre or Sustainable Growth Locations as defined on the Policies Map. This could be borne out of the excessive number of terms used to describe areas with similar functions; terminology should be simplified. For example, there is reference to the Swindon Town Centre, the Central area and the Urban Area. These aren't described in detail in policy terms and the only differentiation between them is the annotations on the Policies Maps. If this is not clarified, the overall 'New Strategic Direction' to encourage Town Centre Rejuvenation may become diluted with sites on the edge of the Central Area given equal policy support.

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

Table 1 should be updated to include: "Town Centre (or Central Area): This is the heart of Swindon's Urban Area and is the Borough's activity hub, with a significant range of services and facilities. It benefits from excellent accessibility with Swindon Railway Station and the Bus Station at its heart."



Respondent No: 557

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title Mr

Q2. First Name Alex

Q3. Last Name Hawtin

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

Reedhawk supports the overall aims of SGL01 to diversify the Central Area to bring forward new homes and jobs. It identifies the need to provide a strong retail core and identifies Regent Street, the Parade and Canal Walk as key shopping streets. Given that a reduction in the overall amount of peripheral retail development would help to focus shopping activity in the retail core, it would be helpful to identify that outside of these locations, there is policy support for diversification to help deliver the other ambitions of Policy SGL01. Reedhawk queries why the Policy suggests that there may be a limit on the number of new homes that can be delivered. Given the sustainability of the location and the suitability for residential development, it would make sense to clarify this wording. In line with later Policy SD1, the SGL should seem to ensure the effective use of land by optimising density and not apply a cap. The 'new urban living' element of the policy should make clear that the ongoing residential development of the Central Area will support existing and proposed commercial and retail services. As set out above, the importance of the Central Area and its diversification to help deliver the growth set out in the plan should be reflected in SS1 and SS2 as a key feature of the Spatial Strategy. The focus of the Central Area as a 'centre for business' will help to deliver new high quality office space. This will free up low performing employment land such as at the former Intel HQ, which is appropriate for residential within Urban Regeneration Areas and on Sustainable Growth Corridors. Reedhawk raises concerns about requirement for a 'comprehensive masterplan' for major development. It is not clear how this would be undertaken or who would lead. Major development needs to be defined within the Local Plan. If major development on several sites was to come forward at once, would there be several different masterplan options? Alternatively, where sites come forward at different paces, a masterplan could remove flexibility for development options on adjacent sites. If sites are forced to coordinate with neighbours at different stages of developing their proposals, this could cause sites that are ready to deliver to be delayed. It should be the role of development management policies to ensure that development does not prejudice adjacent sites. Reedhawk supports the acknowledgement that development sites can enhance walking routes. The redevelopment of Regent Circus offers opportunity to reinstate the historic street network in the area, removing the current barriers to permeability.

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

1. Remove 'up to' before 8,000 new homes.
2. Remove or clarify the requirements for a 'comprehensive masterplan'. If this is required, it should be stated who would deliver this (i.e. SBC) and set a timescale for completing this and allow flexibility for sites to come forward in advance of this, should there be any delays. Masterplanning adds an extra layer of work that may not be needed and will slow delivery.



Respondent No: 558

[REDACTED]

Q1. Title Mr

Q2. First Name Alex

Q3. Last Name Hawtin

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

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

Reedhawk supports the identification of Pipers Way as an Urban Regeneration Area (URA). The URA is located on the edge of the Central Area with strong links to the Town Centre that can be strengthened through the Sustainable Growth Corridor. However, Reedhawk raises concerns that the delivery of the URA relies upon a 'strategic masterplan', but there is no detail on how this would be delivered and who this would be undertaken by. For example, the Former Intel HQ site is within the URA and could deliver homes early in the plan period. Awaiting a strategic masterplanning exercise could delay delivery of this site or remove flexibility for other sites. Development management policies should be utilised to ensure that development does not prejudice adjacent sites. Also, it would be helpful to clarify terminology as the policy refers to a bus transit corridor, whereas the policies map identifies a Sustainable Growth Corridor.

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

Remove or clarify the requirements for a 'strategic masterplan'. If this is required, it should be stated who would deliver this (i.e. SBC) and set a timescale for completing this. Clarify the bus transit corridor or update to refer to the Sustainable Growth Corridor.



Respondent No: 559

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title Mr

Q2. First Name Alex

Q3. Last Name Hawtin

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

Reedhawk raises concerns about point 4 of Strategic Policy SP1, which gives an elevated status to water and energy infrastructure capacity. Statutory undertakers such as Thames Water (under s94 of the Water Industry Act 1991) and SSE Networks (under s16 of the Electricity Act 1989 and section 10 of the Gas Act 1986) have an obligation to provide the necessary network reinforcements to allow for new connections. In accordance with the statutory tests set out in Regulation 122 of the Community Infrastructure Levy Regulations, development should only provide contributions towards improvements to water infrastructure and energy capacity where it is necessary and directly related to development. Development should not be used to deliver improvements resulting from a lack of historic investment by utility companies. This element of the Policy repeats the requirements of draft Policies U1 and D1 and should be removed.

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

Point 4 of Policy SP1 should be removed.



Respondent No: 560

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title Mr

Q2. First Name Alex

Q3. Last Name Hawtin

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

Reedhawk raises concerns that Policy SD2 sets out a requirement for all mixed-use development to come forward under a masterplan approach. This is not proportionate and could act to discourage mixed-use regeneration. As per our comments on SGL01 and UGA02, there is no clarity on who would be responsible for bringing forward masterplans. The requirement for masterplans could result in an extra layer that is not required when the issues can be controlled through the development management process and consideration of site-wide issues would form an important part of developing proposals on mixed-use sites.

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

Point 2 of Policy SD2 should be removed.



Respondent No: 561

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title Mr

Q2. First Name Alex

Q3. Last Name Hawtin

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

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

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

Additional housing sites such as at Regent Circus, which is largely vacant in its current retail use, must be identified to enable the provision of a minimum 10% buffer. Para. 6.7 should be amended to refer to the 10% buffer to provide flexibility.



Respondent No: 562

[REDACTED]

Q1. Title Mr

Q2. First Name Alex

Q3. Last Name Hawtin

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

Policy HC2 needs to be reviewed alongside Policy D1 as these policies are inconsistent. Policy HC2 should acknowledge that where viability may be affected and a lower or alternate level/form of affordable housing is proposed that this would be accepted, as set out in Policy D1.

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

Update Policy HC2 to acknowledge relationship with Policy D1.



Respondent No: 563

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title Mr

Q2. First Name Alex

Q3. Last Name Hawtin

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

Policy HC7 part 2 sets out a requirement on Strategic Growth Locations for a mix of tenures (note there is a typo as this says 'tenue') including opportunities for self-build and custom build. This policy is inappropriate for the Central Area Strategic Growth Location as town centre sites are unlikely to be suitable for self-build and custom build and are unlikely to deliver effective land use that optimises density within the Central Area. Part 1 of the Policy provides all the necessary support for self-build and custom build housing across the Borough, including, where appropriate, on SGLs.

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

Remove part 2 of Policy HC7.



Respondent No: 564

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title Mrs

Q2. First Name Andrew

Q3. Last Name Reader

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

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. It is particularly accessible to family groups, grandparents, parents and grandchildren. This accessibility level is not replicated

elsewhere in Highworth. 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: 565

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title Miss

Q2. First Name Aya

Q3. Last Name Mohamed

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) David Lock Associates on behalf of Mr Paul Waters of BMW Group UK

[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

Representation Form

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

**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	Mr	Miss
First Name	Paul	Aya
Last Name	Waters	Mohamed
Job Title (where relevant)		
Organisation (where relevant)	BMW Group UK	David Lock Associates
Address Line 1		
Line 2		
Line 3		
Line 4		
Post Code		
Telephone Number		
E-mail Address		

2. Request for further notification

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

Yes No

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

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

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

Other (please specify):

Part B – Please use a separate sheet for each representation

Name or Organisation: **BMW Group UK (c/o David Lock Associates)**

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

Chapter	7 (policy FE2) 9 (policies CSE2, CSE3 and CSE6) 10 (policy U1)	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.

BMW support the Local Plan's strategy to deliver a stable and resilient economy. BMW particularly support the continued protection of the BMW Plant Swindon as an Industrial Location which safeguards industrial uses. It is essential that manufacturing uses at BMW Plant Swindon continue to receive this highest level of policy protection to enable the company's operations to expand and modernise within a stable policy environment.

However, BMW request that some policies are reviewed further. This is to assist BMW in its continued operations in a car manufacturing industry facing multiple uncertainties and financial pressures. Providing a clear policy framework is therefore vital. BMW also continue to value measures that facilitate the process of achieving planning permission promptly and would support the updating of the Council's Local Development Order which has now expired.

Policy FE2

Policy FE2 says that development proposals in Industrial Locations should not result in a net loss of existing industrial or warehousing floorspace (B2 and B8 uses). Any net loss of manufacturing or warehousing floorspace should have clear rationale. For example, in certain cases a loss of floorspace may make operations more efficient, or buildings may no longer be required.

Policy CSE2

Policy CSE2 should recognise the overlap with other sustainability metrics (e.g. BREEAM or others), which may already include an element of carbon assessment – we consider the policy should encourage, rather than require, major commercial developments to undertake Whole Life Carbon Assessments. Further, BMW request that the Council to reconsider whether this policy partly duplicates the

content in Policy CSE1 which already seeks to address carbon reduction and sustainable design of new developments.

Policy CSE3

While BMW support Policy CSE3 (and UGF scores) in principle, BMW advise that the policy as currently drafted should be amended to acknowledge limitations of brownfield manufacturing sites in providing urban greening, and should seek to elaborate on the weight to be given to the UGF score compared to the potential loss of Industrial Locations' floorspace – the latter of course is protected under Policy FE2.

Policy CSE6

In a similar vein, Policy CSE6's requirement for 25% canopy cover on major developments should recognise the inherent limitations of achieving this on brownfield manufacturing site, particularly where new buildings need to be erected and dismantled frequently to respond to demand. The policy suggests off-site contributions to the Great Western Community Forest may be sought, but the extent and value of this has not been defined and needs clarification.

Policy U1

Policy U1 requires major commercial schemes to utilise some form of water re-use technology. Whilst we support this in principle, and make use of a rainwater harvesting tank at the Swindon Plant, BMW consider the policy should encourage rather than require on-site provision although we note there is positive recognition that provision may be unviable or unfeasible. BMW seek clarification on the "minimum drought frequency standard" which harvesting systems should be meeting, and whether this needs to be enshrined in planning policy.

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

5. CHANGES

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

Changes identified in **bold**

Policy FE2

5. Development proposals in Industrial Locations should not result in a net loss of existing industrial or warehousing floorspace (B2 and B8 uses) **unless otherwise justified.**

Policy CSE2

Major development proposals over 49 units, or 4,999 m² of floorspace are required to undertake whole life-cycle carbon assessments to support their proposals, **unless otherwise assessed pursuant to Policy CSE1.**

Policy CSE3

Major development proposals should achieve, **unless otherwise justified**, the following target scores against the Urban Greening Factor for England:

- 0.4 for predominantly residential development, and
- 0.3 for predominantly non-residential development.

In some circumstances, the constraints of a site (such as brownfield industrial sites) may result in a score below the required minimum and

where this is the case, this should be explained and justified in planning applications.

Policy CSE6

Proposals for major **greenfield** development should 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 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 **may be sought will be** in line with Policy CSE5 Great Western Community Forest.

Policy U1

On major residential developments, and commercial developments over 4000m³, water re-use technologies for rainwater harvesting and greywater recycling, or other water use technology ~~are required~~ **will be strongly supported** unless unviable or unfeasible on the site. Rainwater harvesting systems should be designed to meet a minimum drought frequency standard (**[Council to establish standard, with reference to guidance]**).

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

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



Respondent No: 566

[REDACTED]

Q1. Title not answered

Q2. First Name Geoff

Q3. Last Name Winslow

Q4. Job Title (where relevant) Planning Manager

Q5. Organisation (where relevant) Wiltshire Council

[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.

Swindon Borough Council 2043 Draft Local Plan Regulation 18 consultation Thank you for inviting Wiltshire Council to comment on the Swindon Borough Council 2043 Draft Local Plan Regulation 18 consultation (SLP). In general terms, the emerging SLP is welcomed as it presents a cogent set of policies and proposals that seek to address the Borough's long-term strategic priorities to meet local needs in a sustainable manner. The comments that follow are, wherever possible, set out in Plan order, focusing on specific chapters within the SLP. Chapter 2: Our Vision and Objectives The long-term vision and strategic objectives of the SLP are supported, particularly the emphasis on sustainable transport, climate resilience, town centre regeneration and infrastructure delivery to support growth. Chapter 4: Spatial Strategy & Strategic Area Policies The spatial strategy and approach to growth, enabling Swindon to meet its own housing and employment needs, is supported; including the focus on directing growth to the Swindon urban area, strategic growth locations, regeneration areas and smaller settlements, as set out in Policy S1. The reference to the Interim North Meadow and Clattinger Farm Mitigation Strategy in Policy SGL03 and Policy SGL06, setting out the need for compliance with the strategy or any subsequent iteration is supported. As a minor point, there appears to be a discrepancy with the cross-referencing of the associated Policy Maps which illustrate the sites allocated by means of Policies SGL03 and SGL06, the site numbers in the Keys do not appear to correspond with the site numbers on the maps. It is understood that the full transport evidence is still under preparation and continued dialogue will be welcomed as part of the ongoing preparation of the Plan to further understand the vision, impacts of proposed growth on the transport network (given the proximity to Wiltshire) and associated mitigation that will be required to support growth. Chapter 5: Sustainable, High-Quality Development The overarching emphasis on

sustainable development, high-quality design, optimising land use and the integration of green and inclusive infrastructure is supported. The safeguarding of historic transport corridors, including the Wilts & Berks Canal and the Swindon and Cricklade Railway (Policy SD9) is supported. Chapter 6: Places for People Policy SP2 in seeking to meet the housing needs for the Borough is welcomed. The proposals, in Policy HC8, to address the needs of Gypsy, Traveller and Travelling Showpersons' Accommodation consistent with the revised definition in national policy is welcomed, including the allocation of new pitches and criteria policy to address windfall sites. However, it is noted that there are outstanding needs to be planned for (five pitches remain unmet to 2043 for Gypsies and Travellers, and 19 Travelling Showpersons' plots). The ongoing Call for Sites is a sensible approach to seeking to meet these as identified in the consultation draft Plan (Paragraph 6.19). Chapter 7: An Economically Thriving Swindon The SLP's approach to deliver a resilient and inclusive economy, including the regeneration of Swindon Town Centre and the provision of new employment land is supported. Chapter 8: A Well-Connected, Active Swindon Chapter 8 sets out a clear and ambitious approach to promoting sustainable transport and active travel across Swindon Borough. Wiltshire Council supports the vision-led strategy and the emphasis on improving connectivity, particularly through the development of transit corridors, mobility hubs, and active travel infrastructure. Policies SP5, ST1-ST5 provide a framework for delivering these objectives. Given the close functional relationship between Swindon and neighbouring parts of Wiltshire, we would welcome continued engagement on the following matters. The proposed improvements to support east–west connectivity, including between the New Eastern Villages and Wichelstowe, are of particular interest to the council. We are supportive of the intention to maximise sustainable transport routes. However, this will need to be achieved in collaboration with meaningful modal shift to avoid displacement of unmitigated traffic flows onto sensitive areas of the network (e.g. Junction 16 of the M4) and further onto Wiltshire's highway network. The areas of Wichelstowe, the New Eastern Villages and Tadpole 'cluster' are close to the Wiltshire boundary and are likely to generate cross-boundary movements. We would welcome further discussion on how these communities will integrate with Wiltshire's transport network, including the A419 and A346 corridors, and how cumulative impacts will be mitigated. The commitment to explore the potential for new rail infrastructure connecting Swindon is supported, and we would welcome further engagement on this. It is noted that Policy SP5 refers to the potential for a station at Royal Wootton Bassett, which is located outside of the Plan area. If this is to be referred to, the relationship of Royal Wootton Bassett to the Plan area should be clarified. In addition, point l) of paragraph 1 of Policy SP5 would benefit from clarification as it is not clear what is intended by the bullet point as worded. The proposed expansion of the active travel network, including new cycle routes and integration with green infrastructure (Policies ST1 and ST5), is supported. We would be interested in exploring further opportunities for cross-boundary connections, particularly between Swindon and adjacent Wiltshire settlements such as Purton, Royal Wootton Bassett, and Cricklade. We would also welcome further information on how the Local Cycling and Walking Infrastructure Plan (LCWIP) has informed the spatial strategy and how it aligns with Wiltshire's own LCWIP. We support the requirement for Transport Assessments and Travel Plans for major developments (Policy ST4). In terms of these matters, we would welcome continued collaboration on transport modelling, particularly in respect of mitigation measures associated with strategic sites and associated infrastructure delivery. We also note the proposed approach to parking and electric vehicle infrastructure (Policy ST5) and would be interested in sharing best practice on managing parking demand and promoting EV uptake in rural and urban fringe areas. Chapter 9: An Environmentally Sustainable Swindon The emphasis on climate change mitigation and adaptation in Chapter 9 and the comprehensive policy framework set out in SP6 and Policies CSE1 to CSE12 is welcomed. The focus on carbon reduction, biodiversity net gain, green infrastructure, and flood risk management aligns with Wiltshire's own priorities. The reference In Policy CSE8 to North Meadow and Clattinger Farm SAC (within Wiltshire) is welcomed as this reflects the Interim Mitigation Strategy and agreed approach to ensure that development does not adversely impact on this important site. We welcome continued engagement on the application of the mitigation strategy, particularly in relation to recreational pressure and the delivery of Suitable Alternative Natural Greenspace (SANG). Whilst Policy CSE8 is supported, consideration could be given to including reference to the mitigation hierarchy and highlighting the need for development proposals to demonstrate that consideration is given to the importance of the hierarchy. In addition to the existing policy wording regarding internationally designated statutory sites in Policy CSE8, consideration could be given to including text pertaining to the need to protect national statutory sites, as well as non-statutory sites, ancient woodland, local wildlife sites, priority habitats / habitats of principal importance and ecological networks. This would ensure alignment with paragraph 188 of the National Planning Policy Framework. We also support the delivery of the Great Western Community Forest (Policy CSE5) and would welcome further engagement where significant cross-boundary planting or access improvements are proposed. The protection of the North Wessex Downs National Landscape and areas of non-coalescence (Policy CSE7) is supported, and we would welcome further discussion on how these policies will be applied to strategic sites near the borough boundary to ensure landscape character and settlement

separation are maintained. Chapter 11: Utilities The inclusion of policies on utilities infrastructure in Policies U1–U3 is supported, particularly the emphasis on water efficiency, wastewater capacity, and digital connectivity. The requirement for early engagement with Thames Water and SSEN to ensure infrastructure is in place to support growth is welcomed. The requirement for water efficiency standards and rainwater harvesting is also supported, as it aligns with Wiltshire Council's own approach to sustainable resource use. Chapter 12: Delivery And Implementation The inclusion of Policy D1 on developer contributions and viability to ensure that appropriate developer contributions are secured is supported, and in particular the prioritisation of transport, health, and education. We also support the use of viability review mechanisms for phased developments to ensure infrastructure needs are met over time. We would welcome engagement on the development of the Infrastructure Delivery Plan and any cross-boundary infrastructure requirements, especially where development may impact shared transport corridors, healthcare provision, or schools. Thank you once again for consulting Wiltshire Council. We look forward to continuing to engage with you on the above matters as the Plan progresses.

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: 567

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Colin and Helen

Q3. Last Name Scull

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

Having attended the consultation event in Wroughton on 6 October 2025, we find ourselves disappointed at the response from SBC representatives regarding the concerns of all the residents of our village. The regeneration of Swindon and its town centre were not the reason we were all there and were further disappointed that this was all the councillors seemed interested in talking about. Even on some occasions, ignoring people who stood to voice their concerns about this outrageous development of our 'village'! With that said, I will now list our strong objections to this development, particularly the area in North Wroughton and Swindon Road where we have lived for 32 years. - The impact on the main road through Wroughton (A4361) which acts as the main commercial route from Devizes and onward to Swindon. This is already a heavily used road with both commercial and residential traffic, meaning an additional burden of thousands more vehicles from the proposed development would be unimaginable. We have already had to endure this part of the main road being resurfaced due to it breaking up causing houses to shake. - There is also the current development of 200 properties in Woodland View with more vehicles feeding on to the A4361. - Wroughton's local roads were not built to sustain such a large increase in traffic, proving detrimental to residents, businesses and schools within the village. - With just the proposed 450 houses at the back of Swindon Road, this could potentially add nearly a further 1000 vehicles onto the A4361 which runs through onto Swindon Road - The proposed inclusion of a convenience store and park area within the new development is meaningless if the infrastructure does not exist for a school or additional doctors' surgery. Our current surgery and 2 pharmacies are oversubscribed and overwhelmed as it is without the addition of thousands of further residents. - The provision of adequate water supplies to the proposed developments would also overwhelm an already struggling water supplier. In addition, flooding is a common problem in the area at the back of Swindon Road with some gardens also being flooded. Concreted areas with new housing could, potentially, force flooding on to the River Rae and across to Wichelstowe. - The development will result in the loss of open countryside and greenfields, which is a valued characteristic of this village. It will also harm the landscape setting, views, and sense of tranquillity and rural character - In addition, the environmental impact on the proposed area would have an unacceptable effect on our current wildlife here, which includes deer, pheasants, egrets and hundreds of species of birds who reside in the hedges surrounding the proposed developments. The hedges, no doubt, being removed. - Whilst Wroughton has increased exponentially over the years, we have remained at heart a 'village' with a village status and a character that will quickly disappear with this huge proposed development. - Public transport through the village is already inadequate with only one 30 minute service now available through North Wroughton after our other service was diverted from North Wroughton to meet the needs of Wichelstowe. People will be forced into their cars onto an already overburdened transport system. - The large area at the rear of our properties on Swindon Road used to provide space for the local farmer's dairy cattle until BSE took them away. This was followed by the area being used as agricultural land and is home to much of the previously described wildlife. - We also suggest that the proposed development would be overbearing and overlooking the neighbouring properties would cause loss of privacy and loss of daylight. - Noise, light pollution and general disturbance during construction are also a concern. - In addition, I have no doubt that the Parish Precept will have to be increased as well as council tax, making it even harder for those who struggle already. For all of the above reasons we urge the Council to refuse this planning application. It would be contrary to planning policy, harmful to the environment, to the rural character of the village, and to the amenity of local residents. We also request that the planning officer carrying out the assessment visits the site and adjoining properties in person to appreciate fully the issues of landscape, privacy, and traffic.

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: 568

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Frances

Q3. Last Name Wilson

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

I am writing to express my strong support for saving and fully reopening the Oasis Leisure Centre, including the Sports Hall and all its facilities. The Oasis has long been an important part of Swindon's identity and community life. It has provided a vital space for physical activity, social connection, and wellbeing for people of all ages. The Sports Hall, in particular, has been a hub for local sports clubs, school groups, and community events — offering opportunities that go far beyond recreation. Reopening the Oasis with access to all its original facilities would have wide-reaching benefits for the town. It would:

- Promote health and wellbeing by providing accessible, affordable fitness options for residents.
- Support young people through sports programmes, helping to reduce antisocial behaviour and improve mental health.
- Boost the local economy by creating jobs and encouraging more visitors to Swindon.
- Foster community pride and engagement, bringing people together through shared activities and events.

If the Oasis were to reopen in full, it could become once again a cornerstone of Swindon's social and cultural life — a place that not only preserves our town's heritage but also invests in its future. I strongly urge the Council/Swindon planning team to prioritise the restoration of the Sports Hall and ensure that all facilities are available for public use when the Oasis reopens. Doing so would demonstrate a commitment to community wellbeing, youth development, and the preservation of one of Swindon's most iconic and loved venues. Thank you for taking the time to consider this important issue. I sincerely hope the Council/planning team will act to secure the Oasis's future for generations to come.

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: 569

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Amanda

Q3. Last Name Woodhead

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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

I live in Wroughton and attended the recent SBC Drop In relating to the local plan. The number of new homes being proposed here is far too many. Wroughton has recent new developments already with Ridgeway View and The Grange. Also new housing has been built at Woodlands View and soon to be at the Hills Waste site. Wroughton has already had all those houses as SBC were unable to demonstrate a 5 year housing land supply. Yet again it seems that SBC are looking to Wroughton to deliver a disproportionate number of new homes. We all know the buildout of Wichenstowe which SBC is a financial stakeholder of, is being built out slowly so as not to flood the market and generate maximum income. The SBC LP proposals for. Large number of dwellings on the town centre will take a while as they are on brownfield sites. So SBC look again to Wroughton, a quite Nice semi rural setting with some easy pickings greenfield sites which can be built on quickly. Poor show SBC. You were rightly given a bloody nose by residents at your drop in session at the Ellendune Community Centre which let's face it you were not keen on holding. Wroughton's infrastructure can't cope with the number of new homes being allocated in the local plan. Eve a third would be a stretch. You don't sweep the roads. Highway maintenance here is a joke, as is the bridge over the M4 onto Swindon Road. Wroughton Parish Council fund the library as you aced all support a few years ago. The Ellendune Community Centre is an ageing facility, again being propped up by the Parish Council. Yet more houses proposed. And none of SBC's investment coming here? I strongly oppose the large volume of new homes being proposed in Wroughton which are not sustainable and will devastate Wroughton's unique semi rural character

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: 570

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Sylvia

Q3. Last Name Brown

Q4. Job Title (where relevant) Vice Chair

Q5. Organisation (where relevant) South Marston Parish Council

[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

12/10/2025

1. Generic Policies

South Marston Parish Council is generally supportive of the draft Swindon Local Plan subject to the following comments and with one major reservation outlined at 1.1.

1.1. The Plan precludes executive level housing.

Para 2.3 aims for Swindon to become '*a go-to destination for business innovation but also a place of indigenous economic growth*'. This requires entrepreneurs and senior executives with personal ambition. The Plan lacks any housing policy to reflect this.

Swindon's urban areas have a housing mix which includes housing for executives and professionals in e.g. Old Town, Broome Manor and in the towns and villages, to include a sprinkling of £1m+ properties. In the last half of the 20th Century, executive houses were mainly built on small sites in rural villages resulting in a very wide travel to work area.

More recently, SBC's Local Plans have relied on Strategic Development Areas in the rural environs of Swindon which have delivered numbers of dwellings, but with densities too high to deliver any aspirational housing.

We see no evidence of background research to address the continued widening of travel to work areas by lack of provision of executive housing. The development framework should enable consideration of aspirational housing in suitable locations not constrained by the delivery of housing numbers.

1.2. A viable Town Centre

We support the Heart of Swindon proposals for a viable Town Centre, building on the successful Bus Boulevard. However, once the entrepreneurs that it is sought to encourage have succeeded, they will seek more aspirational housing.

1.3. Policy SGL 02: the NEV will provide 10,000 houses – how?

Appendix 1 shows a total of sites for 8,500 dwellings. We are aware of SHELA sites for around 500 more, but that is still a shortfall.

1.4. HL3.4 (page118): Concern about Public Open Space Management Companies (Mancos)

Mancos have not been a great success and are not a cost effective way to fund maintenance of public open space and community facilities. They cloud the issues of both responsibilities for maintenance, local governance and accountability.

SMPC put a lot of time and effort endeavouring to avoid a Management Company model for the northern element of the NEV (2,380 houses) by aiming to take over all green infrastructure and community facilities management, to be paid via the Parish Council Precept. We failed, but the Manco that will be created is to be handed to residents' control following completion of the build, with the ability to hand responsibility to the PC. This would finally end the substantial cost of the Manco administration.

Our experience is that, for at least large developments, early and willing engagement by the developers and an initial payment to the Parish Council to cover the gap until the Precept money comes on stream is needed.

2. New Eastern Villages, SP18-012 : North of the Railway Line

We note the old NC3 and RA3 is being replaced by a single policy covering South Marston and Rowborough villages under SP18-012. We can also see that the long list of provision of infrastructure of various kinds has been substantially hard-wired in by NEV permissions already granted and therefore less necessary to cover in the main overall Policy.

2.1. Housing Delivery

The estimated quantum of housing in the South Marston expansion and new village of Rowborough was set at 2,000 houses in the current Local Plan.

In 2025, planning permission for 2,380 houses was granted for the majority of, but not all of the old Strategic Development Area, with construction well underway. If the phasing plan progresses as planned, build out will be complete before 2032.

Since the original quantum was set in the current Local Plan, an additional 76 houses have been, or are being built in South Marston village outside the original Strategic Development Area.

2.2. South Marston Village Neighbourhood Plan supports the re-development of brownfield land at Crown Timber and Thornhill Industrial Estate.

We are pleased to see their inclusion as potential housing development sites in the proposed Local Plan. Outline plans for most of the brownfield land was submitted over a decade ago, showing delivery of a further total of 128 dwellings.

There are two sites we have previously highlighted to SBC where the main housing development consortium did not acquire the land; these are **Oxleaze Farm** on Thornhill Road and **Manor Farmyard**. SMPC is keen to secure orderly development of these two sites for housing which will bring benefits to the overall South Marston expansion. Both of these sites require road connectivity with neighbouring housing parcels (R1 and R2, 'Thornhill'). SMPC has been working with the main NEV housing developers and SBC planners to deliver appropriate road networks via the Reserved Matters applications stemming from the outline planning permission for S/OUT/21/1555.

2.3. We propose Oxleaze and Manor Farmyard are included in the land allocation table in the Local Plan Appendix, providing at least 30 additional dwellings if the road connectivity can be achieved.

Note: the Policies Map has an area covered by 'site allocations' that reflect land covered by the 2,380 dwellings permission granted in 2021. It does not, however, reflect all land identified as being within the original Strategic Development Area for old Policy NC3. See para 3.1 below.

We note the draft Local Plan has suggested two other sites for housing development, at **Meadow Cottages** on Nightingale Lane and **the Quest** on Old Vicarage Lane.

2.4. We strongly object to the inclusion of the Meadow Cottages site in the Housing Allocation table (page 131), most of which lies substantially within parcel R9 currently being constructed by Taylor Wimpey.

For the small area of the site remaining, the road layout for parcel R9 does not enable road access to the remaining land other than via Nightingale Lane. We object to any additional vehicle traffic on Nightingale Lane which is a single lane road without footways or substantial verges. The long term vision, as outlined in our Neighbourhood Plan, is retention as a safe and direct cycle/pedestrian route from South Marston village to the new village of Rowborough.

Measures taken by SMPC to enable this include working with development planners and Forestry England to remove vehicle access to Nightingale Forest by creating a new access and car park via Rowborough Village (Condition 9 attached to permission S/OUT/21/1555).

On the basis of our Neighbourhood Plan policies we have mounted successful defences on several planning applications which would have increased vehicle traffic on Nightingale Lane, one going to a planning appeal. Rowborough Lane is also a single track road and a bridleway without a footway, and is similarly protected within our Neighbourhood Plan.

2.5. We propose that the South Marston expansion paragraph in SP18-012 includes a reference to having no vehicle-generating development off Nightingale Lane or Rowborough Lane.

A planning application at **The Quest** was submitted in recent years when it was noted that the rear half of the site is currently within the flood area of South Marston Brook and unlikely to qualify for development. We had no objection to eventual development on the remaining section fronting Old Vicarage Lane, but only when the build out of the new roads and pedestrian links between Old Vicarage Lane and the main village had been completed.

2.6. We would be content for some of the land at the Quest site to be developed for housing, but not all.

Note: The Quest land is currently included in the Allocations table (p133) but no additional quantum stated above the 2,380 dwellings that are already being delivered through the main NEV planning permissions.

2.7. Anti-Coalescence land

Other than outlined above plus a few backland and infilling locations where at most 2 dwellings might be provided, there are no further sites within South Marston village north of the railway line that can be developed as small housing parcels. All land to the south, west and northwest is already committed as employment, housing or open space secured by condition to existing planning permissions. A few sites at South Marston Farm are, as outlined in the SHELA, compromised by archaeology or have no road access.

To the northeast and east, all attempts to develop east of Highworth Road have been confounded by lack of suitable road infrastructure and lack of safe pedestrian and cycle links. We currently have solar farms on a significant proportion of the land. The area south of Nightingale Lane between South Marston Village and the new Village of Rowborough is currently classed as anti-coalescence land.

2.8. We would prefer to see this eastern anti-coalescence land denoted on the Policies Map, stretching both north and south of Nightingale Lane.

This would safeguard the principle of separation which is included in the proposed Policy SP18-012 and give added weight to the aim of creating safe cycle and pedestrian routes.

2.9. Density of Housing

We note that there is no specific mention of density of housing in SP18-012, whereas a lower density of 30 dwellings/ha was specified for South Marston village expansion in the original RA3. This reflected a more 'rural' village but it was also an acknowledgement of the inability of the area to deliver acceptable road access for high density developments.

The original 'absolute' limit of 500 dwellings at South Marston was set by the Inspector at the Examination in Public for the current Local Plan. This resulted from full investigations of the potential for adequate road connections between Old Vicarage Lane and the A420.

As part of the 2021 permissions, the Carpenters Arms railway tunnel on the Old Vicarage Lane approach to the A420 will become a single-carriageway, signalised road and will actually take increased traffic because of the additional two accesses onto Old Vicarage Lane from the Rowborough development. Paragraph 2.1 of this response notes that South

Marston village expansion has already significantly exceeded the 500 housing limit allowed by the existing Local Plan for which the road junction capacity was calibrated.

Our current Neighbourhood Plan places design limitation of no more than 2 storey housing apart from landmark locations and lower density housing than elsewhere in the NEV in order to retain a 'rural feel' to the village expansion. We are concerned that the loss of RA3 may reduce the overall impact of these policies without appropriate mechanisms linking it to the new Local Plan.

We believe the combined effect of the above arguments justify a statement about reduced density of housing in South Marston.

2.10. We ask that lower density guidance and limitations on dwelling height for South Marston Village are considered in the emerging work on the Character and Density study (page 14) and imported into the relevant Local Plan Policy for the NEV.

This would then be consistent with Policies SP1(para 2.a) on Sustainable Development and SD1 (para 1) on Effective Design.

2.11. SP5 (para 3.a) South Marston Parkway Station.

We note the aspiration to deliver a parkway station in the future alongside the railway as it runs through South Marston parish. In terms of safeguarding land, the only level access would be achievable at the section between Gablecross Police Station and the Petrol Filling Station on the A420.

However, if parkway parking was important, the major new road access to the A420 being constructed under the railway line at Rowborough might be an opportunity to widen the embankment to cope with additional rails. Alternatively, the lack of use of the Rail Freight Terminal in the last 30 years might also present an opportunity.

3. Policies Map

The map requires changes to ensure that the land immediately east of Thornhill Road, which was within the Strategic Development Area for the NEV, is identified as being within the Strategic Growth Area for South Marston Village.

3.1. Amend the Policies map to include all land east of Thornhill Road between the entrance to Oxleaze Farm and the Thornhill Rd Industrial Estate to enable the Oxleaze Farm site to come forward as outlined in para 2.3 above.

3.2. Policies Map – the following notations are difficult to interpret:

- Notation '18 -039' close to South Marston Brook. If this is the Quest land that is able to be developed for housing, it is in the wrong position.
- The overlay of light grey hatching surrounding some but not all of the land either side of the railway is not, as far as we can see, identified on the key.
- Pale blue sites alongside the A420. Not easy to understand unless it implies not for further development. North of the railway, reasons for non-development would be a mix of archaeology, lack of road access, designated as landscaping via planning permissions, or included in policy SP18-012 as not developable. South of the railway, it includes sites already developed or in need of safeguarding for future use.



Respondent No: 571

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Karen & Nicholas

Q3. Last Name Coventry & Small

Q4. Job Title (where relevant) Commercial Director & Head of Built Environment and Infrastructure

Q5. Organisation (where relevant) Cheltenham and Gloucester Omnibus Co. Ltd. T/A Stagecoach
West & Go South Coast Ltd. T/A Swindon's Bus Company (Joint
Response)

[REDACTED]

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

Chapter 3 New Strategic Direction These representations are made by Go South Coast Ltd. trading as Swindon's Bus Company, on behalf of itself and Stagecoach West. Between us we run the vast majority of bus services in the plan area, and to surrounding areas. We strongly agree with and support the New Strategic Direction. This reflects several major strategic factors, all of which have a critical salience for the future of the town, and its sustainable evolution in a manner that reflects the Strategic Objectives of the draft plan, as well as wider local and national policy. We see the essence of the need for this new focus lying as follows:

- Perpetuating the decades long approach that sought large scale expansion of the town, largely on greenfield sites is no longer appropriate, given the climate emergency and the other more local physical constraints on peripheral expansion of the town on a large scale. Indeed, there would be clear grounds to challenge the suitability of the previous strategy where development east of the A419 is concerned, that is largely "baked in" to the towns development over the forward planning period, and has to be accepted as a "given".
- The previous strategy is no longer possible. The suitable opportunities to meet development needs on large scale green field urban extensions do not exist, at least within the constraints presented by topography and infrastructural capacity, including that which can readily be provided.
- The previous strategy is no longer needed. As it is, there is a very large overhang of permitted residential development on the outskirts of the town, mainly east of the A419. This is now moving forward, Page 4 of 5 belatedly, towards delivery and this it forms a very large proportion of the necessary development pipeline. Where employment land is concerned, the redevelopment of Honda has secured up to 7m sq ft of B2/B8 uses on a vey extensive previously-developed site. Other employment needs can be met within existing commitments and within the urban area, including the town centre.
- The previous strategy is no longer fit for purpose in securing development needs in a way consistent with sustainable development. In particular, successive rounds of urban extension since the 1990s have delivered very large-scale development that is not only largely car-dependent, but almost impossible to offer a relevant public transport choice into. Where current strategic allocations are rolled forward, notwithstanding agreed strategies accompanying consents, in many instances we have consistently raised serious concerns that these may not be deliverable during the build-out, and more generally, may not be either sufficiently effective or sustainable in the longer term. While we will do our best to support the best possible outcomes for committed development – and it is in our interests to do so – it is time to be quite clear that on the basis of very clear local evidence "more of the same" can be expected to lead to outcomes that are no better and potentially substantially worse.

The New Strategic Direction involves the following two key principles:

1. Town Centre Rejuvenation and Urban Housing Density We agree in the strongest possible terms that the opportunity offered both in the town centre, and to regenerate other key parts of the existing urban fabric, must be taken up and maximised. This is entirely consistent with NPPF, and strongly supports the environmental, but also the economic and social tenets of sustainable development that too often play a subordinate role in the thinking of plan-makers. The town centre was the hub of the town in the past. Decades of under-investment, alongside policies that supported large scale investment on the periphery, have combined with wider secular trends to leave the town centre in an especially unfavourable condition. Strong policy action needs to be taken to create the conditions to invest once again in the central area. It is by far the most accessible location by sustainable modes, for an urban area of well over 200,000 population. We do not underestimate, however, the financial and technical barriers that exist to delivering against this goal. Likewise, the two Urban Regeneration Areas offer clear potential to make best use of previously developed-land in the urban area, which is obviously preferable, and strongly supported by NPPF. There is clear evidence much of this potential can and will be delivered relatively early in the plan period. They are alongside rapid transit corridors also identified in the plan, where we agree there is important potential to consolidate density of development and thus demand for transport in a manner that allows an overall reinforcement of the public transport offer. It is therefore vital that these transit corridors see sufficient investment in effective measures to make buses faster and more reliable, as well as more frequent. Urban intensification makes best use of all kinds of existing collectively-consumed infrastructure, and this is economically as well as environmentally rational.
2. The Environment and Movement We welcome and endorse, again most emphatically, the recognition that addressing current travel behaviour through proper alignment of transport with spatial planning policy, is essential if carbon mitigation is to be effectively secured. Despite the fact the Borough is largely urban, single-occupancy car use is unusually high. The strategy must – as the Council intends – secure a radically higher use of active travel and public transport.

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

A very large portion of future development will be delivered through current consents on greenfield sites. We note and welcome later in this response, that the plan is looking to make better use of land within these development areas. In pursuit of the New Strategic Direction, we wonder if the plan could go further in encouraging optimisation of existing commitments, both through densification and in so doing, also securing both stronger short-medium term housing supply, and a larger number of smaller typologies and affordable tenures. We recognise that existing consents can be lawfully implemented. However viability is clearly challenged, and the housing market itself is seeing significant structural changes away from owner-occupation. In addition a new consent is to be sought for the balance of the Wichelstowe development. Further unconsented land does exist - not least around the Neighbourhood Centre within New Eastern Villages, and south of the Neighbourhood Centre in Wichelstowe.



Respondent No: 572

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Karen & Nicholas

Q3. Last Name Coventry & Small

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) Stagecoach West & Swindon's Bus Company (Joint Response)

[REDACTED]

1

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

Strategic Policy FE1 Office Development (Scale and Location) These representations are made by Go South Coast Ltd. trading as Swindon's Bus Company, on behalf of itself and Stagecoach West. Between us we run the vast majority of bus services in the plan area, and to surrounding areas. We welcome and broadly support the policy. Historically offices were treated as a B-class employment use in the statutory Use Class Order. Their redesignation as a commercial use under the E-class is a major shift in national policy. This use class is viewed as one for which a "town-centre-first" location is needed. The office market in Swindon has been subject to accelerated evolution in recent years. This follows wider domestic and international trends, but also reflects the particular history of the town and its consistent fast development over many decades. This led to a great deal of office development in the town centre from the 1960s to the 1980s, north and south of the railway, and the development of two major out-of-town office campuses at Windmill Hill in West Swindon, and at Croft. The last major office development at Croft, by Nationwide, dates from the 1990s. Much of the Croft Campus excluding Nationwide, is proposed for comprehensive residential led regeneration under Policy UGA2. In addition to these, there are significant but smaller out-of-centre office clusters at Westlea, Drakes Way/Greenbridge, and Kembrey Park. The former WHSmith office complex at Greenbridge has already been redeveloped for residential. While office work has seen a sudden accelerated shift toward home-working, precipitated by the COVID-19 public health crisis, leading to a sharp fall in demand for office space, this is far from universal. There are also clear signs that a steady rebalancing of work patterns back to the office, whether hybrid or full time, has been underway for the last 2-3 years. Other key office markets in the M4 corridor and Thames Valley have been seeing a "flight to quality", to buildings that offer high levels of occupier amenity and support current and anticipated levels of digital technology. Town and city centre locations, with strong rail access, are now strongly favoured by major office occupiers especially in dynamic high value-added sectors. However, Swindon's office footprint has been particularly subject to obsolescence, in terms of both quality and location. This has led to the conversion of a large proportion of town centre offices, including the key North Star site north of the Station, to apartments. This process remains on-going. The economics of physical redevelopment in Swindon are especially challenging given residential sale and rental yields. We nevertheless hope that the broader trends will allow Swindon to see a restoration of the office market in the town centre and station area within the SGL01 Policy Area, notwithstanding the challenges faced by the Kimmerfields redevelopment to date. The accessibility of the out-of-centre office locations broadly favours access by car over sustainable modes, in some cases of the very edge of the town, to an extreme degree. The current restructuring needs to more explicitly signal the principle of residential redevelopment of low-density office campuses on the edge of town, with a view to supporting the relocation of these activities back to the town centre, when major investment decisions are being made. Here, the low-density nature of the buildings and extensive surface car parking and landscaping may make both residential redevelopment or other employment development such as B2/B8, more viable.

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

We invite the Council to consider if certain out-of-town low-density office campuses should be formally identified for potential redevelopment for other uses, whether in B or C use classes as appropriate, in line with the commentary above. This would be a permissive policy position, offering a higher level of certainty to the market at a time when the office market remains in a state of marked flux.



Respondent No: 573

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Karen & Nicholas

Q3. Last Name Coventry & Small

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) Stagecoach West & Swindon's Bus Company (Joint Response)

[REDACTED]

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

Strategic Policy FE3 Network and Hierarchy of Centres These representations are made by Go South Coast Ltd. trading as Swindon's Bus Company, on behalf of itself and Stagecoach West. Between us we run the vast majority of bus services in the plan area, and to surrounding areas. We strongly support this policy and its intention, that is directly compliant with NPPF guidance on the protection of existing town centres and the provision of services in locations that supports a sustainable pattern of development and movement. Such a network of centres is necessary to maximise the availability of facilities, services and - through retailers - goods, that minimises travel distances and maximises the potential for these to be reached first by active travel and then by public transport. We welcome and support the identification of Urban District Centres, and Primary Rural Centres. We agree that the vitality of the retail and leisure offer in the Main Town Centre, Urban District Centres and Primary Rural Centres must effectively be protected by policy in line with NPPF policy. However, currently the Policy, while sound in principle, is not effective in practice. The final tier of Local Centres is not listed in policy but in the explanatory memorandum at Table 8.

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

The Policies Map on its own does not make policy, but only reflects it. We urge that the policy is made sufficiently specific, by ensuring these designated Local Centres within Table 8 are listed within the policy itself, as well as marked on the proposals map. There needs to be more specificity regarding some local centres: East Wichel within Wichelstowe stands out. This should include the neighbourhood centres yet to be built in the allocated Strategic Growth Locations.



Respondent No: 574

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Karen & Nicholas

Q3. Last Name Coventry & Small

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) Stagecoach West & Swindon's Bus Company (Joint Response)

[REDACTED]

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

SBC admin note: Please also see attached response.

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

not answered

Representation Form

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**By E-mail to: SwindonLocalPlan2043@swindon.gov.uk or
By post to: Planning Policy Team, 5th Floor, Swindon Borough Council, Civic Offices, Euclid St, Swindon, SN1 2JH**

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

This form has two parts –

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

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

Part A

1. Personal Details*

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

Agent's Details (if applicable)

Title	Mrs	Dr
First Name	Karen	Nicholas
Last Name	Coventry	Small
Job Title (where relevant)	Commercial Director	Head of Built Environment and Infrastructure
Organisation (where relevant)	Cheltenham and Gloucester Omnibus Co. Ltd. T/A Stagecoach West	Go South Coast Ltd. T/A Swindon's Bus Company
Address Line 1	[REDACTED]	[REDACTED]
Line 2	[REDACTED]	[REDACTED]
Line 3	[REDACTED]	[REDACTED]
Line 4	[REDACTED]	[REDACTED]
Post Code	[REDACTED]	[REDACTED]
Telephone Number	Via agent	[REDACTED]
E-mail Address	Via agent	[REDACTED]

2. Request for further notification

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

Yes No

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

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

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

Part B – Please use a separate sheet for each representation

Name or Organisation: **Swindon's Commercial Bus Operators**

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

Chapter	SGL01	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.

Strategic Policy SGL01 - Swindon's Central Area Strategic Growth Location

These representations are made by Go South Coast Ltd. trading as Swindon's Bus Company, on behalf of itself and Stagecoach West. Between us we run the vast majority of bus services in the plan area, and to surrounding areas.

This policy is the largest single new development land supply component in the plan. It nearly doubles the current plan's aspirations for the area, which since its adoption in 2016, has far from been met. That said, the policy for New Eastern Villages, on a greenfield site in multiple private controls, is of comparable scale and has delivered even fewer new homes to date.

It is essential that this policy is demonstrably effective and can credibly deliver development needs.

Most of the land is in public sector freehold control, including Swindon Borough Council, and Network Rail. This presents both opportunities and additional challenges. These have been very evident in the Kimmerfields development, north of Fleming Way. Former railway land clearly presents significant issues of ground conditions and potential contamination, that were also encountered at the time the former railways works redevelopments took place along Penzance Drive.

We note that the Strategic Growth Location ("SGL") includes substantial areas west of Regent Street occupied by the extensive Brunel Centre. This was opened in 1973, and was among the largest and most innovative such developments of its time. It has now mostly been vacated, and it is clearly largely redundant given major shifts in retail behaviour and the progressive

movement of most comparison retail out-of town, to locations offering extensive free surface parking. This secular trend has had a profound influence on the relevance of the bus network offer, notwithstanding the gradual emergence of the Orbital Retail Park as a bus terminal and interchange in its own right.

The completion of the Fleming Way Bus Interchange this summer marks a major step in redeveloping a town centre that was designed largely around the car. This addresses the severance effect of a heavily engineered dual carriageway and creates a major green infrastructure corridor in place of a vehicular one. It has been entirely reassigned to sustainable modes, including strategic cycling provision.

However, redevelopment of the wider town centre, and in particular the Brunel Centre, will obviously be a complex and financially very onerous exercise. Much of town centre reflects redevelopment of extensive areas that were formerly occupied by Victorian dwellings undertaken from the early 1960s. This urban fabric has become simultaneously superannuated, across a very broad area. This includes a range of buildings and key facilities such as the Wyvern Theatre. The complexity and costs of replacing this built development is orders of magnitude greater in real terms than its creation.

The plan and policy must therefore maintain a very delicate balance between ambition and deliverability, including a need for flexibility. The need to optimise the potential is clear, not least to support viability. Achieving sufficient density as well as appropriate disposition and mix of uses, will be essential. There is a very strong read-across with and dependency on the effectiveness of draft policy SD5 "Tall Buildings".

There is an equally great strategic need to maintain and substantially enhance the function of the town centre as a public transport and sustainable modes interchange. This role has always been undermined by the way that the strategic vision of the 1960s to 1980s, failed to give any great attention to this role, but was more concerned with traffic circulation and car parking. A strong policy steer is essential to avoid this being perpetuated and compounded by the approach taken to the SGL.

As the hub for most bus services, the town's commercial bus operators have a very great interest in the vitality of the town centre, In fact, only the Council itself probably has a greater stake and concern in its successful evolution to meet today's needs.

We welcome and **strongly support** the ambition for this Strategic Growth Location. The key is the rail station, and its immediate environs. Lying almost equi-distant between Reading and Bristol, with fast connectivity beyond to central London and the Thames Valley, there ought to be good grounds to believe that once unlocked, this development could transform the town. It would be well connected in all directions without the need for personal car ownership. This would be the epitome of sustainable development, breaking the legacy of decades of car-dependent expansion.

We see successful delivery of high-density mixed-use regeneration around stations at all other points on this line – even Chippenham. The recent history of Maidenhead, albeit much nearer London and Heathrow, is one of several encouraging precedents. This secondary centre had seen marked and prolonged decline since the late 1980s. Successive regeneration proposals have stalled and failed over several decades. However, significant new mixed

use residentially led development started to come forward once Crossrail was committed, and this is now being followed by office developments and refurbishments some even speculative, given tenant interest. Several of these are consolidating their footprints from former out-of-town campus locations into Maidenhead town centre.

We support and welcome the policy focus on a range of key objectives. We note and **welcome** a continued emphasis on retail, a renewed focus on residential development, a recognition that business and office uses can and should be refocused into the town centre, that the centre is a key transport gateway, and that leisure, learning and culture also should be sited in the most accessible part of the town by sustainable modes. This strongly supports all the plan's strategic objectives, and also the socio-economic elements of sustainable development.

The need for coordinated and coherent developments set out at limb 3) is vital and supported. This policy is phrased such that a degree of flexibility is inherent, and this is appropriate and important to its effectiveness.

There remains a great need to improve pedestrian and cycling connectivity across the central area, especially north of Fleming Way towards the station and beyond the railway. The role of improved green infrastructure in securing an attractive and liveable place, and mitigating against the effects of a changing climate, should not be underestimated and limb 7) is especially **welcome and supported**.

The Fleming Way Bus Interchange represents the biggest intervention in green and blue infrastructure in the town centre for decades and this gain should be consolidated, including at either end.

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

5. CHANGES

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

We urge the Council to tighten up the policy focus and aspiration on the area around the station, to ensure that the seriously squandered potential for improved connectivity between all sustainable modes is fully realised. We separately comment on this at Policy ST2 limb 3) which we suggest is re-positioned and strengthened within this policy.

We suggest that policy is **changed** to make it more effective in securing the strategic objectives of the plan, including, to best secure the highest levels of sustainable connectivity that will itself drive development values and support viability.

*"d) Station gateway: High-quality development alongside **both north and south** of the railway line and **around** a regenerated station to provide a ~~far more impressive first impression when arriving by train and opportunities to improve permeability across the railway transport interchange, and distinct and memorable public realm, at the centre of a vibrant mixed use development that transforms local accessibility, including~~*

pedestrian permeability across the rail line, and to Fleming Way and the town centre;

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



Respondent No: 575

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Karen & Nicholas

Q3. Last Name Coventry & Small

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) Stagecoach West & Swindon's Bus Company (Joint Response)

[REDACTED]

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

SBC admin note: Please also see attached response.

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Agent's Details (if applicable)

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First Name	Karen	Nicholas
Last Name	Coventry	Small
Job Title (where relevant)	Commercial Director	Head of Built Environment and Infrastructure
Organisation (where relevant)	Cheltenham and Gloucester Omnibus Co. Ltd. T/A Stagecoach West	Go South Coast Ltd. T/A Swindon's Bus Company
Address Line 1	[REDACTED]	[REDACTED]
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Post Code	[REDACTED]	[REDACTED]
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E-mail Address	Via agent	[REDACTED]

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Part B – Please use a separate sheet for each representation

Name or Organisation: **Swindon's Commercial Bus Operators**

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

Chapter	SGL02	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 SGL02 New Eastern Villages

These representations are made by Go South Coast Ltd. trading as Swindon's Bus Company, on behalf of itself and Stagecoach West. Between us we run the vast majority of bus services in the plan area, and to surrounding areas.

Notwithstanding the renewed and intensified focus on town centre redevelopment, this remains the largest single component of housing supply, and is rolled forward from the current Local Plan Core Strategy 2016. As currently allocated for about 8,000 homes, it remains one of the largest comprehensively planned developments in the UK, following a long history of such planned extensions since the 1970s.

Major strategic infrastructure investment in highways, especially on and approaching the A419, required to support the allocation's delivery has already taken place, meaning that risks in this area can be greatly discounted.

However, it is apparent that the A420 through the Borough and this allocation continues to be under severe capacity pressure, despite improvements at Gablecross and White Hart. This key inter-urban corridor, used by the highly successful Stagecoach S6 service towards Oxford, is locally as well as regionally significant. The role of the S6 serving the central spine of New Eastern Villages (NEV) including a potential Park and Ride/Mobility Hub near Acorn Bridge at its eastern gateway, has always been apparent.

There remains a major residual risk that the current broad architecture for sustainable mobility to and through NEV cannot be delivered as a result of a dispute with the freeholders of Panattoni Park regarding the completion of the spine across their boundary. This has been the subject of legal challenge as far

as the Supreme Court, and as such the current position looks unlikely to change in the foreseeable future. Without this being resolved, there remains a further risk that suitable access for all modes to the Great Stall East Neighbourhood remains seriously compromised, at least until the completion of a major link to the south into Lotmead Village is delivered and the full link made available connecting to the Southern Connector Road (SCR) across Wanborough Road. Current phasing proposals in the public domain indicate that this will not take place until at least 2038.

Current Policy in the Local Plan and in SPD, including the NEV Bridges SPD, are quite explicit about the key infrastructure needed to support sustainable movement and connectivity, including high quality public transport.

Applications, resolutions to grant, or outline permissions, exist for the vast majority of the current allocated area. These total 2575 dwellings north of the A420 (largely Rowborough Village) and 5630 south of the A420. A few of these are on land slightly outwith the footprint set out in the NEV Master Plan. Assuming that these are also consented, a total of 8205 dwellings can be considered committed. The majority of the largest parcels, with the exception of Great Stall East where a consent remains to be issued, are now commenced or are at the point of commencement, after many years when development has stalled.

With the exception of Foxbridge South, these consents do not provide for a policy-compliant level of affordable housing. A level around 20% is typical. Some currently unconsented smaller parcels may provide the policy-compliant 30%. This reflects significant viability challenges, and we recognise that these may tighten further, to the extent that further variations to consents may need to adjust consented targets downwards over the lifetime of the plan. The tenure split is material to demand for bus services, and a very high level of owner-occupation demonstrably damps bus service demand, as is clearly evident across Swindon from Census data.

The commitments total does not include significant areas that have yet to come forward as applications, mainly found in the far west of the NEV area immediately south of the proposed Neighbourhood Centre. This includes "Great Stall West", providing key vehicular connectivity including part of the central sustainable movement spine running east to west south of the A420, and "Upper Lotmead", that delivers a key north-south link between these facilities and Lotmead, with Foxbridge and Redlands beyond. These have a nominal capacity of 700 dwellings and 850 dwellings respectively, though we are not apprised of development parameter and density assumptions.

This suggests that NEV could nominally deliver 9755 dwellings.

While short of the nominal 10,000 capacity now indicated by policy, we think the capacity remains a reasonably robust estimate in that:

- It offers scope for appropriate density uplift in parts of the development, especially around village centres and along the two main bus corridors, running through Great Stall and Lotmead. This would also support a more balanced typology and tenure mix than was previously anticipated. It would make the best use of land, as NPPF expects. It would also broadly support the viability of such future bus services as can be offered, as well as other local services that increase internal self-containment. The bus companies would be **minded generally to support strongly any future applications to vary**

consents to uplift development quantities, especially by alteration of density parameters, within the NEV area.

- Further small parcels of land are apparently within the scope of the overall Master Plan and vision for NEV, that could add modest numbers to the figure above.
- We would support modest extension of Newlands Village in particular, to create the critical mass for better local services, and potential public transport that at the moment are not anticipated. This makes this development, the first village to be delivered, exceptionally car-dependent even by Swindon standards.

The retention of the allocation with an enhanced nominal capacity of 10,000 dwellings is therefore **supported, subject to some significant changes, in particular to ensure that policy retains a clear set of expectations with regard to sustainable transport connectivity and bus service delivery.**

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

5. CHANGES

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

Notwithstanding the expectation set out in current policy, there are now serious concerns about how far, and when, reasonably attractive and relevant bus services can be provided into New Eastern Villages.

The bus companies have consistently advised that two principal discrete bus corridors are identifiable within the NEV Master Plan structure:

- A single corridor along the central spine through Great Stall to the Acorn Bridge P+R/Mobility Hub. This would accommodate a diverted S6. It would also support the principal route to Rowborough North of the A420, provided that the easternmost access point under the Great Western Main Line were provided. The deliverability of streets and connectivity to support such a route is now under serious doubt, with four "failure points": The A419 crossing once dubbed the "Green Bridge", that has been deleted from policy, at either end of the link at Panattoni Park, and between the A420 and Rowborough.
- A second principal corridor mainly serving development south of Dorcan Brook, using the Southern Connector Road from Great Western Hospital through Commonhead and Foxbridge Village and then via Lotmead to ultimately serve Great Stall East. This route looks to be credibly deliverable from south to north as Lotmead builds out, and evidence by the consented phasing plans. We nevertheless still have profound concerns about the urban design approach on the link through Lotmead, the provision of sufficient and effectively located bus stops, and suitable temporary turning points within Lotmead. These have been consistently and duly conveyed to the Council.

A third bus route is separately identifiable serving Rowborough via the South Marston Extension, and the consented Master Plan for the development makes provision for this. This route does not serve South Marston Village and was

never intended to, though it might need to on an interim basis. The route - pursuant to the urban design approach taken - is slow, inefficient and unattractive. The bus operators have also conveyed consistent concerns about the routing and bus stopping arrangements within Rowborough as the development is built out. As these concerns have not been heeded by officers, there is considered to be a very high probability that a meaningful bus service will not be technically deliverable until a very late stage in the development build-out. It may never develop sufficient patronage to support commercial operation, especially if bus mode shares are similar to those seen at Badbury Park and other recent urban extensions.

Most of NEV, including consents south of Dorcan Brook, looks likely to be delivered off single points of access for many years – in particular, the Southern Connector Road to Commonhead. Without the timely delivery of connectivity over key boundaries to the north, as well as over the Great Western Main Line from Rowborough, peak traffic demands are likely to lead to lengthy queuing and delays for traffic leaving the development. This will cripple the delivery of bus services at the peak times when these facilities are most needed. There are certainly historic examples of this, that prove that this concern is far from theoretical.

Given the current consented position – including the due discharge of important planning conditions – it is clear that the baseline position today is very different to that anticipated by current adopted policy. We recognise that to be effective, the plan must be deliverable based on known factors and constraints. To that extent, it is **reasonable and necessary that the original provisions in policy must fall away in the new local plan.**

However **they need to be replaced by clear deliverable aspirations, that properly align with and realise LTP4 and Local Plan objectives as far as possible.**

Limb 2b) should be amended as follows:

*"improve secure excellent connectivity to the Central Area and between settlements, ~~including through~~ with **primary emphasis on the provision of direct, secure and efficient** walking, cycle and **public transport routes, while also maintaining suitable safe and efficient circulation for general traffic. High regard should be given to the opportunities to leverage green infrastructure routes which connect into the Borough's Green Infrastructure Network and transit corridors;***

Limb 3) should be amended as follows:

*"Infrastructure Obligations in this area will be prioritised in line with the Council's NEV Infrastructure Prioritisation Matrix. **The timely delivery by developers of key movement connections will be sought through planning conditions and/or s106 as appropriate.**"*

Even these changes are likely to need further supplemental policy to be set out, to be effective.

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



Respondent No: 576

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Karen & Nicholas

Q3. Last Name Coventry & Small

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) Stagecoach West & Swindon's Bus Company (Joint Response)

[REDACTED]

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

SBC admin note: Please also see attached response.

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

not answered

Representation Form

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

**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	Mrs	Dr
First Name	Karen	Nicholas
Last Name	Coventry	Small
Job Title (where relevant)	Commercial Director	Head of Built Environment and Infrastructure
Organisation (where relevant)	Cheltenham and Gloucester Omnibus Co. Ltd. T/A Stagecoach West	Go South Coast Ltd. T/A Swindon's Bus Company
Address Line 1	[REDACTED]	[REDACTED]
Line 2	[REDACTED]	[REDACTED]
Line 3	[REDACTED]	[REDACTED]
Line 4	[REDACTED]	[REDACTED]
Post Code	[REDACTED]	[REDACTED]
Telephone Number	Via agent	[REDACTED]
E-mail Address	Via agent	[REDACTED]

2. Request for further notification

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

Yes No

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

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

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

Part B – Please use a separate sheet for each representation

Name or Organisation: **Swindon's Commercial Bus Operators**

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

Chapter	SGL03	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 SGL03 Kingsdown Strategic Growth Location

These representations are made by Go South Coast Ltd. trading as Swindon's Bus Company, on behalf of itself and Stagecoach West. Between us we run the vast majority of bus services in the plan area, and to surrounding areas.

This allocation is also one rolled over from the current adopted plan (reference NC5) with a nominal quantum deliverable remaining at 1846 dwellings.

It has yet to come forward. The bulk of the site benefits from Resolution to Grant issued in December 2023 (S/OUT/17/1821). This includes only 17% affordable housing, mostly intermediate tenures. A decision was issued in July 2024, but no s106 is published, and the status of the application is "unknown" according to the SBC public register.

A number of smaller parcels within the allocation have also been submitted for consent, but are undetermined.

This site lies east of the A419, and the existing junctions at Coldharbour/Turnpike are operating consistently above capacity. The need for a new bridge over the A419, and to avoid further burdening Broad Blunsdon and the existing village with additional traffic, justifies many of the existing and proposed policies. The timely delivery of the A419 bridge is essential, but presents obvious substantial viability challenges.

We would highlight a significant number of applications pending determination in the Broad Blunsdon area, both sides of the A419, totalling 529 dwellings to the east and almost 450 to the west. None of this is supported by current draft policy. It remains unclear to us how far agreement has been reached with

National Highways as to how capacity limitations in the network might be addressed to permit this.

The scale of recent development in the village, all brought forward as departures to the adopted development plan, is also significant. The village does not benefit from a regular bus service, but the combination of demands from the village with the allocation would materially positively support a single bus service serving both. At the anticipated frequency of 20 minutes this might be expected to have a modest but material damping influence on demand car-borne journeys from the village. The bus service would also introduce a regular bus service to the Groundwell Industrial Estate, which is a significant network gap.

The presence of extensive bus priority on the main Cricklade Road corridor that serves this site is a very particular advantage. However there remain significant problems, where provision is discontinuous at Groundwell, and with inappropriate parking in Gorse Hill, which in combination with poorly conceived traffic calming undertaken in the 1980s, continue to mean that the efficiency and reliability of the corridor is challenged at times.

We separately urge the Council to address these issues, though this is now practically achievable through LTP4 and the BSIP rather than through planning policy.

The site remains a significant expected contributor to meeting development needs. While challenges clearly remain to its delivery, over a decade of work has been expended on demonstrating that it represents sustainable development. It is far from clear to us how far alternative preferable sites are suitable, available and deliverable in the sense set out in NPPF, that would be preferable and thus justify the de-allocation of this site.

We therefore **support** the continued allocation subject to minor changes.

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

5. CHANGES

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

Limb 2d) should have explicit regard to public transport, and the opportunity to further cost-effectively enhance the effectiveness of the Cricklade Road "transit corridor" at Groundwell and Gorse Hill:

"sustainable high quality active travel and public transport links that integrate the Strategic Growth Location into Broad Blunsdon and into the Kingsdown transit corridor, via a bridge connection over the A419, taking advantage of opportunities to cost-effectively enhance the effectiveness of the transit corridor were possible;"

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



Respondent No: 577

[REDACTED]

Q1. Title not answered

Q2. First Name Karen & Nicholas

Q3. Last Name Coventry & Small

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) Stagecoach West & Swindon's Bus Company (Joint Response)

[REDACTED]

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

SBC admin note: Please also see attached response.

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

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**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.*

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First Name	Karen	Nicholas
Last Name	Coventry	Small
Job Title (where relevant)	Commercial Director	Head of Built Environment and Infrastructure
Organisation (where relevant)	Cheltenham and Gloucester Omnibus Co. Ltd. T/A Stagecoach West	Go South Coast Ltd. T/A Swindon's Bus Company
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Telephone Number	Via agent	[REDACTED]
E-mail Address	Via agent	[REDACTED]

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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"/>

Part B – Please use a separate sheet for each representation

Name or Organisation: **Swindon's Commercial Bus Operators**

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

Chapter	SGL04	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 SGL04 Witchelstowe

These representations are made by Go South Coast Ltd. trading as Swindon's Bus Company, on behalf of itself and Stagecoach West. Between us we run the vast majority of bus services in the plan area, and to surrounding areas.

This site is rolled forward for the second time, currently allocated under Policy NC04. The most recent outline consent issued in 2019 as a s73 amendment, has a total scope of 4500 dwellings.

This includes land already completed at East Witchel that accounts for 909 dwellings. The new consent governs the remaining phases. The current joint venture between Swindon Borough Council and Barratt-Redrow delivering the project is well advanced on Middle Witchel, with 2102 units nominally accounted for ("Lump 2"), all subject to reserved matters approvals or submissions. Two primary schools, a secondary school, the East Witchel Village Centre and a substantial part of the Neighbourhood Centre have been delivered over a trajectory that commenced in 2007.

We are informed that it is intended to apply for a new outline consent to govern the balance within the next 18 months. This will reflect necessary changes to ensure the site appropriately responds to opportunities and constraints, as well as current realities. This "Lump 3" would nominally deliver 1400 dwellings within the parameters agreed in the current outline, as well as employment and a Park and Ride site.

Policy SGL04 expects that the remaining area will deliver "at least 1600 homes". This expectation is not clearly tied to the current scope of the reserved matters, as a baseline that allows the entire development scope and

its likely impacts to be properly accounted for. Thus, it is not clear what the policy refers to, to allow decision takers to properly evaluate proposals once they are submitted.

Notwithstanding this, we **strongly support** the proposed renewal of the allocation.

We also **strongly support** a policy that makes suitable provision to uplift development capacity to reflect the opportunities and steer a revised master plan that optimises the use of scarce development land in a very sustainable location – the most sustainable of the peripheral SGLs by a very considerable margin. This will support higher levels of internalisation by active travel modes, marginally improve the viability of any bus service – that are currently quite challenged notwithstanding developer funding – and deliver more housing directly adjacent to some of the largest employment clusters in the plan area. A development uplift might support a higher proportion of truly affordable tenures.

Two bus services are offered to Wichelstowe one by each bus operator. Both run via Old Town to the town centre. Stagecoach service 9 continues to link to Wroughton. The original development concept consented in 2004, and again subsequently, anticipated an exceptional level of bus priority, both within the development using so-called "Sustainable Access Routes" (StARs) and beyond it, with a peak-only mode filter on the main route to the north via Red Post Drive.

The StARs within East Wichel was built but never activated, in favour of providing higher levels of parking for residents on street. The mode filter has been likewise constructed but has never been activated. Its implementation was to be reviewed at the point that western access under the M4 via Hay Lane was opened to traffic. This is anticipated to take place by Summer 2026.

The current consent deleted the remaining western length of StARs through Middle Wichel. However, a number of small targeted bus priority measures remain anticipated to be implemented. This includes a direct bus-only link between the Neighbourhood Centre and Scott Way between parcels 9 and 13. Multiple bus routing options exist under the current master plan approach, and it is important that in any new consent, the optimum options to permit efficient bus circulation are retained. It is conceded that this might not justify all the bus measures currently anticipated. We would value early discussion with the Joint Venture and the Council regarding this matter.

This is still the more vital in that bus use, especially from Middle Wichel, is exceptionally low. In part this reflects the dwelling typology and tenure split, which includes 15% affordable of which most are intermediate tenures. It is crucial that efficient, attractive services are offered, including a wider range of direct bus connectivity to key destinations in the town, and possibly a short distance beyond.

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

5. CHANGES

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

Broadly we consider that the draft policy "covers all the bases" needed to steer a new Lump 3 application. It could use some slight tightening, having regard to ensuring the development continues to operate and read as a coherent and attractive "whole".

*"The Council will require high-quality development in this area that will **secure opportunities to optimally enhance and complement the existing delivery complete the development in line with the plan's strategic objectives.***

2. *Proposals for development in this area shall:*

- a) *demonstrate how ~~new delivery~~ the approach to the final phases supports and complements the existing development already completed and committed...*
- b) ...
- f) *~~link in~~ maximise efficient effective bus operation including securing appropriate bus priority routes to and through the site and into the wider transit corridors;*

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



Respondent No: 578

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Karen & Nicholas

Q3. Last Name Coventry & Small

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) Stagecoach West & Swindon's Bus Company (Joint Response)

[REDACTED]

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

Strategic Policy SGL05 East Wroughton These representations are made by Go South Coast Ltd. trading as Swindon's Bus Company, on behalf of itself and Stagecoach West. Between us we run the vast majority of bus services in the plan area, and to surrounding areas. This is one of only two significant additional greenfield allocations proposed by the Council. We note that about 1050 dwellings are considered deliverable. Previous jointly-made representations by the bus operators to both formal Reg 19 consultation the aborted previous Local Plan Review unequivocally supported development in this location that was then proposed. We noted then that among other things, the settlement is a highly sustainable location in itself, being very closely related to the town and having a range of local facilities including its own secondary school. We maintain this strong support. Wroughton benefits from two regular bus routes, both run by Stagecoach West. Service 9 is a local service via Wichelstowe. This is supplemented by the 49, once branded the Trans-Wilts Express, which is a major inter-urban facility to Devizes then continuing to Trowbridge. This has recently been enhanced to run every 30 minutes as far as Devizes. Together 4 buses per hour are offered. Both services serve the Perry Lane stop on Woodmead Road at the southwest corner of the draft allocation. The 49 continues north on Swindon Road/Croft Road and provides the most direct route, also serving the wider allocation to the north. Page 4 of 5 The ultimate service pattern in this area may alter to reflect changes that take place to Wichelstowe. However, we can offer great confidence that a regular bus route will continue to serve this area in any eventuality. The whole allocation lies within walking distance of the existing route. While care should be taken to retain and where possible enhance stop infrastructure, including pedestrian crossings, there is no need for buses to enter the development area. However east-west pedestrian permeability needs to be secured and maximised, as far as possible integrating with and through that in existing development already delivered east of the A4361. Some development may consequentially lie over 400m from stops, but this will be a relatively small minority and in this context should not be considered a great problem. High quality cycling infrastructure should be expected to serve to mitigate this as well. However, there is clear opportunity to provide bus lanes along Croft Road within existing highway to the East Wichel junction. This opportunity should be taken to the fullest extent possible. The opportunity to contribute to funding extension of bus priority northbound on Pipers Way should be taken. Parts of the site are within reasonable walk of Pipers Way. While buses serve this road, including Swindon's Bus Co 11, for historic reasons no bus stops are provided. This should be addressed. There is an additional possibility that Pipers Way might at some stage offer direct bus connectivity to the Great Western Hospital.

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.

Specificity is needed as to what contributions are required to effect to the rapid transit corridor. Previous policy for Wichelstowe, and sought s106 contributions to a Wichelstowe Rapid Transit Corridor. By the time this limited funding was ready to be disbursed in 2015, neither budgets nor political will were adequate to result in very meaningful action. However, feasibility work made clear that there was no scope to effect bus priority of any kind on Croft Road. A short length of bus lane was installed northbound on Pipers Way. Sufficient public highway exists to extend this further north to Marlborough Road. Limb d) should be altered: "d) Contribute towards the bus transit corridor with particular regard to extending northbound bus priority on Croft Road and Pipers Way".



Respondent No: 579

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Karen & Nicholas

Q3. Last Name Coventry & Small

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) Stagecoach West & Swindon's Bus Company (Joint Response)

[REDACTED]

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

Strategic Policy SGL06 North Tadpole These representations are made by Go South Coast Ltd. trading as Swindon's Bus Company, on behalf of itself and Stagecoach West. Between us we run the vast majority of bus services in the plan area, and to surrounding areas. This is a new greenfield allocation, that has never before been consulted on. It represents a stand-alone site extending north into open countryside, with a nominal capacity of just over 500 dwellings. It is barely of a scale that might be considered strategic. It is accessed from William Morris Drive, leading to Ermin Street and the Turnpike/Coldharbour junction. While access to the south is also offered, towards Thamesdown Drive through Tadpole Garden Village, the former route direct to the SRN and a wide range of local destinations including the Great Western Hospital is likely to prove greatly more attractive. The development is of insufficient size to support any new facilities or self-containment, beyond what is adjacent and nearby. Certainly the Great Western Academy offering secondary education is within immediate reach. A new primary school and a major new primary healthcare facility adjoin the site, which is very positive. However, the nearest convenience retail is offered within Tadpole Garden Village, far enough to be beyond convenient walking, if not cycling reach. There is no significant employment within convenient walk or cycling distance. The site is not served by public transport. The nearest service Stagecoach 4, is available at the local centre at Tadpole Garden Village. This runs every 20 minutes. However the stop is over 1000m away and journey time from the town centre in particular reflects a route that necessarily has to combine as much demand as possible over a very long terminal loop north of the Orbital Page 4 of 5 Centre, to be viable. By its nature this route cannot be diverted nor extended to the site. The quantum of development involved is evidently in no way sufficient to support a new service on its own. Thus *prima facie* this draft allocation could be considered as representing a fragment of suburban development poorly related to the wider town and struggling to secure sustainable connectivity. Wider land parcels at Upper and Lower Widham Farm have been known to be under promotion for some time in the near vicinity but are omitted from the draft plan. So is the current application for about 400 homes north west of Abbey Farm, off Lady Lane/Tadpole Lane. All these, as well as further development at Broad Blunsdon, have been strongly resisted to date by the Council and National Highways on the basis of the impact on the safe and efficient operation of the Strategic Roads Network, being the A419 at Coldharbour. However, these all represent a more compact form of development than this draft allocation, better related to existing local services and public transport. It is thus rather confusing to us that a somewhat less sustainably located site would be taken forward in planning policy, when it essentially appears to present the same problem. However, the bus operators have long signalled that one option to resolve the current highway capacity problem, and also boost the viability of inter-urban bus services, would be to create north-facing slip roads to/from the A419. Various measures would no doubt be needed associated with this, to prevent rat-running through Tadpole Garden Village, for example. The most radical would be for these to be buses and emergency vehicles only, though clearly this would seriously hinder the business case. However very substantial public highway remains along the Ermin Street that could also be repurposed to effect bus priority, if needed. This would allow the Stagecoach 51 and other routes to Cirencester to serve Broad Blunsdon, and if suitable stops were delivered near the slip roads, this allocation. The ability to then additionally release many of the other sites in the area would also secure greater critical mass of demand which could help support an overall more sustainable level of local and inter-urban bus provision in this area, taking advantage of the Kingsdown rapid transit corridor in Cricklade Road. These sites are likely to be necessary in any even in the medium of not near term, to secure the substantial acceleration in delivery needed in the housing trajectory. However, while we can see the logic behind the draft allocation, in its current form it looks to be quite unsustainable, and is not supported. However, we would be happy to discuss the opportunity further with the Council and the promoters in the round, having regard to a more strategic approach to access and sustainable mobility in this part of the plan area.

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 things stand, we would advise that this draft allocation is not carried forward. The quantum of development involved is not of a scale that makes it too difficult to identify credible alternatives. However, we have signalled our recognition that further exploration and testing might address the issues we raise.



Respondent No: 580

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Karen & Nicholas

Q3. Last Name Coventry & Small

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) Stagecoach West & Swindon's Bus Company (Joint Response)

[REDACTED]

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

Strategic Policy SP1 Sustainable Development These representations are made by Go South Coast Ltd. trading as Swindon's Bus Company, on behalf of itself and Stagecoach West. Between us we run the vast majority of bus services in the plan area, and to surrounding areas. Most of draft policy SP1 is eminently supportable. However, the policy fails to fully align with and support achievement of the plan's own strategic objectives and other strategic policies, and in particular deliver the New Development Approach, which places modes shift towards active travel and public transport at its heart.

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.

Limb 2) needs to be amended to ensure that development proposals secure the intent of wider national and local policy, including the Decarbonisation Plan for Transport (DfT, July 2021), Swindon's LTP4, Chapter 9 of NPPF, and the plan's own Strategic Objectives. A new sub-limb needs adding: "TBC) requiring development proposal to secure the most efficient, convenient and safe possible access and connectivity by walking, cycling and public transport, prioritising this over movement by general traffic."



Respondent No: 581

[REDACTED]

Q1. Title not answered

Q2. First Name Karen & Nicholas

Q3. Last Name Coventry & Small

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) Stagecoach West & Swindon's Bus Company (Joint Response)

[REDACTED]

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

SBC admin note: Please also see attached response.

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

not answered

Representation Form

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

**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	Mrs	Dr
First Name	Karen	Nicholas
Last Name	Coventry	Small
Job Title (where relevant)	Commercial Director	Head of Built Environment and Infrastructure
Organisation (where relevant)	Cheltenham and Gloucester Omnibus Co. Ltd. T/A Stagecoach West	Go South Coast Ltd. T/A Swindon's Bus Company
Address Line 1	[REDACTED]	[REDACTED]
Line 2	[REDACTED]	[REDACTED]
Line 3	[REDACTED]	[REDACTED]
Line 4	[REDACTED]	[REDACTED]
Post Code	[REDACTED]	[REDACTED]
Telephone Number	Via agent	[REDACTED]
E-mail Address	Via agent	[REDACTED]

2. Request for further notification

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

Yes No

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

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

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

Part B – Please use a separate sheet for each representation

Name or Organisation: **Swindon's Commercial Bus Operators**

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

Chapter	SP5	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.

Strategic Policy SP5 Better-Connected, Active Neighbourhoods

These representations are made by Go South Coast Ltd. trading as Swindon's Bus Company, on behalf of itself and Stagecoach West. Between us we run the vast majority of bus services in the plan area, and to surrounding areas.

This Policy is the key mechanism to secure the key strategic objectives of the plan with relation to both transport and carbon mitigation. For the draft plan to be sound, having the test of effectiveness particularly in view, is therefore vital that this policy is very judiciously framed.

National policy has been seeking a rebalancing of travel behaviour to sustainable modes since 1998, translated into strong broad national planning policy objectives in 2000. In 2012 the initial National Planning Policy Framework (NPPF) sought to continue this emphasis, and continues to do so in Chapter 9, with which this draft plan must be in conformity to be sound.

However, nationally as well as in the plan area, it is clear that past and current policy has been too weakly framed to be effective. A change in emphasis and a greater level of specific intentionality is required.

The new language in NPPF regarding "Vision-led" approaches to transport planning and strategy also necessitates a change, not least because there is no guidance nor generally agreed consensus on how such methodologies should be framed. Indeed, this new language can quite reasonably be anticipated to lead to poorly-evidenced, narrative-driven "fantasy-led" transport planning strategies, that in practice risk even higher levels of car use and misdirection of limited transport investment into insufficiently effective sustainable travel measures.

The draft policy starts to set out key long-term strategic aspirations for bus service connectivity at limb 2. Not all of these aspirations are fully congruent the Bus Service Improvement Plan, which has a much shorter horizon than the local plan, and even LTP4. This is not necessarily a problem given the misalignment of timescales. However, by the time the pre-submission draft plan is published, there ought to be a much clearer agreed “in-principle” position and read-across that the bus operators are able to explicitly support, including through one or more statements of common ground.

The urban form and structure of Swindon’s principal urban area is the product of large scale plan led growth and master planning to a very unusual degree, reflecting post war government-designated “New Towns” more than even most other towns that grew under the Town Development Act 1952. As such its reflects urban structure and urban design approaches that are intentionally car-led. This polycentric structure and intentional decentralisation of key trip-generating activities has both weakened the town centre, at the hub of the bus network, and strengthened the relative advantage of car use for local trips to the extent that behavioural change is going to be particularly challenging to effect.

- The extreme peripherality of the Great Western Hospital, on a key node on the SRN and accessible from much of the town directly via motorway and expressway routes formed by the SRN on the edge of the expanded urban area, is a very substantial problem for those who are not able to drive.
- The town’s remaining comparison retail offer has all-but-entirely fled the town centre to an exceptional degree, while paradoxically, venues such as the Orbital Shopping Park and even more so, the Fashion Outlet at the former railway works, are thriving and attract car-borne visitors from across the town and well beyond.

Urban design also poses serious problems for delivering efficient and relevant bus services. The town is an unusually rich source of evidence of successive urban and street design orthodoxies, at the time often pioneering, from the 1950s to the present day. These, until the early 2000s, facilitated direct and intentionally fast roads for traffic, with buses taking much slower, more complex and convoluted routes.

- This is very readily apparent in West Swindon. It takes an even more extreme form in the even more extensive Northern Development Area (NDA). Bus productivity within most of the NDA, in terms of average speed, is matched by even lower demand for the services offered. The legacy of PPG3 and its approach to strongly limiting residential parking standards has been among the most corrosive problems, which is ironic to the point of being perverse. Bus routes are periodically entirely blocked by parked cars, involving the need for the constabulary to attend. Very extended bus journey times to key destinations have been a very substantial contribution factor in why bus patronage has failed to develop as hoped, despite initially very high levels of service frequency – as often as every 10 minutes in the late 1990s.
- The role played by the B4006 orbital road within the urban area in facilitating relatively direct driving routes between out-of-centre origins and destinations should not be underestimated. That section between the A420 Oxford Road and the A4312 Queens Drive built in the early 1970s is especially effective in serving its intended purpose. However, adjoining residential development stands well off it, accessed by long loop roads, that intentionally prevent any connectivity by cars, or public transport to adjacent neighbourhoods. This precludes a reasonably effective and progressive bus service, in Eldene, Liden, Dorcan and

Covingham, and less obvious, also means that earlier 1950s development in Park North and South cannot easily be linked directly to the Hospital. This is hugely problematic in delivering an effective orbital bus service on the east side of town. Remedyng this legacy would unavoidably be very costly and involve some major civil engineering.

The most recent developments and those consented, despite the evidence available and our own consistent advice, do not consistently offer attractive public transport routing.

- Wichelestone was that development that took the most radical steps to prioritise active travel and public transport through urban design, and could have been a nationally important exemplar, but after 2010, much of the strategy where bus was concerned, has apparently been abandoned, albeit not entirely.
- As we have stated regularly in specific representations to major development proposals, we have significant and increasing concerns that public transport will be insufficiently relevant, efficient and attractive to be effective as a good mode choice, or viable in several future developments. This is a particular concern with New Eastern Villages. Addressing this will necessitate bold collaborative action, including developers.

Most recently, especially since the early 2000s, the town's strategic location on the SRN and the immediate adjacency of strategic development sites to it, has led to the town seeing increasing levels of car-based out-commuting, as the form of development has facilitated the town acting as an attractive location to settle for households increasingly priced out of adjacent travel-to-work areas. Public transport can in no way realistically substitute for such trips. We urge the Council to establish in more detail how these trends currently operate.

The town, that has also long been unusually youthful, is now seeing a significant shift towards an ageing demographic and this trend is unevenly visible across neighbourhoods reflecting the time that they were built. Many cohorts now at and beyond retirement age are those that were at the vanguard of mass car ownership and use. There is increasing evidence that, having never had a history of bus use, they are especially resistant to changing their travel behaviour. Declining economic activity rates in neighbourhoods built in the 1965-1980 period, especially where mainly owner-occupied, are now seeing some of the most obvious secular declines in bus use.

All these factors taken together mean that addressing the strategic objectives of LTP4 and the local plan where public transport is concerned, represents a challenge that should not be underestimated. Strong action will need to follow policy, across the town.

There are certainly important strengths on which to build that the draft plan picks up:

- An unusually high level of bus priority across the town, with substantial lengths of continuous or near-continuous bus lanes
- Many key radial corridors offer the potential for further enhancement of bus priority, many of these forming the "rapid transit corridors" highlighted on the strategy and on the proposals map.
- A high level of ambition to restructure the town centre, which forms a key part of the plans strategic approach.

We therefore recognise well the strategic public transport connectivity issues highlighted in policy, not least to the hospital from neighbourhoods to the north, complementing an existing link provided by Swindon's Bus Co. service 12 from the west.

However, the policy and its emergent evidence base, will need to work much harder to evidence the cause of these issues and then put specific policy measures in place to address them, including mechanisms that credibly can fund such interventions. This will be especially important for an eastern orbital bus service (Limb 2a).

This will involve the measures set out in the Infrastructure Delivery Plan as well as future review of the Bus Service Improvement Plan with a horizon looking beyond 2029.

We note the aspirations set out at policy limb 3) for rail connectivity. Again, we recognise the rationale for these. Two new stations in the vicinity of M4 junction 16 and East of Swindon related as much to the A419/A420 node, as well as New Eastern Villages credibly could be anticipated to substantially shift patterns of movement and travel behaviour – at the very least offering a much more credible option for current longer-distance out-commuting, but also likely to stimulate this greatly.

The Strategic Business Case for both these looks likely to be quite straightforward to frame. Progressing these to deliverable proposals, is likely to be hugely more challenging. We can point merely to aspirations at Corsham and Grove in neighbouring authorities that have existed for over 20 years, with no clear sign of progress to delivery in the foreseeable future. At the Wixams, south of Bedford on the Midland Main Line adjoining major strategic mixed-use allocations are in the process of delivering over 6,500 dwellings, even the presence of an existing 4 track line with "fast and slow" sides, has failed to avoid delays of very many years. The original Bedford Borough and Mid Bedfordshire Local Plan allocations date back to 1999-2000. This is a highly analogous context to these proposals.

It is well established and acknowledged at Limb 3 a), that the existing capacity of a 2-track Great Western Main Line currently needs to be devoted to longer-distance inter-city services. This being the case, the costs of a Swindon Parkway Station to the east are all but certain to necessitate a four-tracking solution involving full Transport and Works Act powers, that might even need to involve substantial stretches of track between Swindon and Didcot, given separate aspirations for an intermediate station at Grove within Oxfordshire. It may be worthwhile progressing schemes to the point that justifies reservation of sites/land to deliver them, but this cannot take place within this current plan-making round. There is also a risk that unrealistic policy expectations might lead to both Council professional and financial resources as well as developer funding, being sought or set aside that would be diverted from other more deliverable and effective local public transport schemes.

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

5. CHANGES

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

Limb referencing at Limb 1) needs amendment.

Limb 1 j) needs substantial reinforcement, to set a clear and definitive expectation that mode shift outcomes will be secured in support of the LTP4 and the plan's strategic objectives:

"j) promoting actively and systematically taking steps to rebalance the mobility infrastructure towards sustainable modes of transport, encouraging to maximise the attractiveness of walking, cycling and public transport where to the greatest extent feasible and by bringing forward the necessary infrastructure, including within and between existing neighbourhoods. This will to create safer and greener communities and encourage substantive and measurable behavioural change in the next generation, both in existing and new development."

Limb 1 l) is framed in terms that are overly aesthetic. We suggest a more clear and directive policy wording:

"l) building on the opportunities created by Swindon's excellent location to improve connectivity by sustainable modes between the town and Borough and other key economic and scenic hubs destinations in adjoining areas of such as Oxfordshire, Wiltshire and the Cotswolds, maximising the town's strategic potential as a regional hub."

We urge the Council to reinforce the policy in limb 2 with greater clarity and to ensure, in collaboration with operators and where necessary with development promoters, specific connectivity outcomes are both justifiable and deliverable.

"2. As part of improving connectivity across Swindon, the Council will continue to work collaboratively with bus operators explore the following:

- a) the potential for an 'orbital bus route' substantially enhanced orbital bus connectivity or alongside substantial speeding up and reinforcement of key cross town links bus re-routing via the Centre, in discussion with local bus companies. A key priority for this will be enhanced and easier public transport access to the Great Western Hospital.**
- b) potential improvements to East-West connectivity in particular between and beyond two of the Borough's key strategic sites (New Eastern Villages and Wichenstowe), whether via the town centre, taking advantage of substantially enhanced bus priority, or via Marlborough Road, or both."**

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



Respondent No: 582

[REDACTED]

Q1. Title not answered

Q2. First Name Karen & Nicholas

Q3. Last Name Coventry & Small

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) Stagecoach West & Swindon's Bus Company (Joint Response)

[REDACTED]

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

SBC admin note: Please also see attached response.

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

not answered

Representation Form

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

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Part 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	Mrs	Dr
First Name	Karen	Nicholas
Last Name	Coventry	Small
Job Title (where relevant)	Commercial Director	Head of Built Environment and Infrastructure
Organisation (where relevant)	Cheltenham and Gloucester Omnibus Co. Ltd. T/A Stagecoach West	Go South Coast Ltd. T/A Swindon's Bus Company
Address Line 1	[REDACTED]	[REDACTED]
Line 2	[REDACTED]	[REDACTED]
Line 3	[REDACTED]	[REDACTED]
Line 4	[REDACTED]	[REDACTED]
Post Code	[REDACTED]	[REDACTED]
Telephone Number	Via agent	[REDACTED]
E-mail Address	Via agent	[REDACTED]

2. Request for further notification

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

Yes No

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

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

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

Part B – Please use a separate sheet for each representation

Name or Organisation: **Swindon's Commercial Bus Operators**

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

Chapter	SS1	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 SS1 Spatial Approach to Growth

These representations are made by Go South Coast Ltd. trading as Swindon's Bus Company, on behalf of itself and Stagecoach West. Between us we run the vast majority of bus services in the plan area, and to surrounding areas.

We **strongly support** Policy SS1, in line with our comments on the New Strategic Direction for the plan.

We note that supplementary growth is envisaged in some other locations, commensurate with the urban hierarchy defined and justified under Policy SS2.

There is clearly a very substantial difference between the settlements identified as "Large Villages", being Wroughton and Highworth, and the smaller settlements. Not least these both have established frequent bus services, secondary schools, and a certain amount of local employment within the or very nearby. Further development at these locations is clearly sustainable in principle, subject to other constraints. We recognise that in recent years a number of sites have been proposed and brought forward in both settlements.

In this regard we note that strategic scale development is proposed at Wroughton. None is proposed at Highworth. This is quite incongruous and it is not possible to find any evidential justification for this. Recent appeal decisions confirm the relative sustainability of Highworth.

In previous consultation rounds, some significant albeit non-strategic options were proposed at Highworth. These are no longer proposed.

We previously indicated our support in principle for these locations. One key factor in this support was that there was an identifiable need to ensure sufficient opportunities were available to ensure a range of deliverable sites in the early years of the plan and avoid other less sustainable locations being brought forward.

The greater transparency of the supply pipeline at NEV and Wichelstowe does allay these kinds of concerns materially, but far from completely.

Many other major supply components, not least redevelopment in the central area, parts of NEV, and Kingsdown, have timescales that must be considered highly prone to delay. Having a wider range of sites that can be drawn upon in the first 5-7 years of the plan is in our view both prudent, and supportive of a sustainable pattern of growth overall.

Thus, we urge that policy draws a clear distinction between the function and sustainability of Highworth and Wroughton, and the other smaller settlements, following from the very clear evidence, and the need to ensure development needs are met sustainably.

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

5. CHANGES

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

In line with our comments at Policy SS2, we believe that it is not justified, and thus not sound, to treat all levels of the urban hierarchy in the same terms where the spatial strategy is concerned.

We thus consider that limb 2 of Policy SS1 should be altered:

"Supplementary Appropriate levels of growth consistent with the role and function of other settlements will be supported. Beyond the two Service Centres, more limited development (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."

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



Respondent No: 583

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Karen & Nicholas

Q3. Last Name Coventry & Small

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) Stagecoach West & Swindon's Bus Company (Joint Response)

[REDACTED]

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

Strategic Policy SS2 Settlement Hierarchy These representations are made by Go South Coast Ltd. trading as Swindon's Bus Company, on behalf of itself and Stagecoach West. Between us we run the vast majority of bus services in the plan area, and to surrounding areas. The draft Settlement Hierarchy is not supported. We believe that it does not properly reflect the evidence base, thus is not properly justified. We do not believe that it effectively secures the objectives of the plan. Policy SS2 does not set out the Settlement Hierarchy, which is rather published alongside it, in what is what in effect is the explanatory memorandum, at Table 1. Interestingly, this contrast with draft Policy FE3 where the network and hierarchy of centres is set out within the policy text. There is a key distinction drawn between Rural Service Centres and Villages. We agree that beyond Swindon's Principal Urban Area, a clear distinction needs to be drawn between larger villages, and those larger settlements that offer a much wider ranges of employment, service and sustainable transport opportunities. This distinction should draw on clear evidence about the relative level of such provision. The presence of a secondary school ought to be one key basis for establishing the Rural Service Centre category. Beyond this there is a very strong distinction that reflects a range of local service provision, including bus services operating at least three times per hour, with evening and Sunday services. This underlines the substantially more sustainable credentials of Highworth and Wroughton, that serve a broader rural hinterland. Unlike many localities these hinterlands are relatively limited. Page 4 of 5 It is also right to consider how this hierarchy might evolve as a result of committed development or future development plan allocations. For example, a large stand-alone new settlement offering a secondary school, a significant new neighbourhood centre and a substantial amount of employment on land allocated for that purpose, would be appropriate for designation as a Rural Service Centre. This is the approach that has been taken with Salt Cross Garden Village within the West Oxfordshire Local Plan 2031, as one example. The policy surely needs to directly and robustly read across to the policy proposed for the network and hierarchy of town centres and central places in Policy FE3. FE3 at Limb 2c) classified Highworth Town Centre and Wroughton Village Centre as "Primary Rural Centres", distinct from smaller village centres, a distinction that we support strongly. We disagree that New Eastern Villages or any one of the discrete "villages" can be considered as being either "rural", or as serving a wider rural catchment to any material degree. The allocation has always been justified as a large urban extension, albeit its integration with the existing town and its internal coherence are peculiar and rather weaker than would typically be seen. The individual villages are defined by intervening stream flood plains and not by any desire that these should function as service centres, nor meet the needs of adjoining "villages" to any great degree. Nor are they likely to do so, as they are each of insufficient size to support even a primary school and convenience retail in each. Lotmead and Great Stall East are each proposed as Rural Service Centres. Lotmead offers nothing more than these and they are aimed at supporting appropriate local internalisation, within a development scale of over 2500 dwellings that well justifies it. However, they do not meet needs arising outside the village. Convenience retail for Newlands would in all probability be met at Wanborough. Primary education for Foxbridge may be met at Lotmead, but may equally be met at Newlands. Neither village will offer any employment. There is no direct connectivity planned between existing employment at Panattoni Park and Great Stall East (or west for that matter). The same is true between South Maston and adjoining large scale distribution parks. In fact there is a much stronger case to designate West Swindon as a Rural Service Centre, as a discrete place, standing physically separate from the main built-up area in the same way. Even Tadpole Garden Village might be considered as having a broader service role than any single village within NEV – though not by much. Policy needs to signal clearly the relative sustainability of settlements, to assess the broad locational suitability for further development. Conflating these villages with the Rural Service Centre category is not sufficiently justified by the evidence. Chiseldon and Wanborough do offer some services to a wider and quite sparsely populated rural hinterland, mostly lying outside the plan area. The level of services in Broad Blunsdon is slightly lesser, and it does not serve a material hinterland. Public transport is very limited, especially in Broad Blunsdon and Wanborough. We agree that the sustainability of these cannot be considered comparable with Highworth and Wroughton. Foxbridge and Redlands will be physically discrete development areas within NEV. Functionally speaking this in no way makes them villages in the generally accepted sense, even new ones, which ought to offer at the very least, a primary, a local centre and a regular public transport offer, ideally seven days a week, to be considered a village capable of accepting further development. In these cases there is no physical potential for growth in any case.

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

To be effective, the Settlement Hierarchy needs to be included within the formal Policy SS2. Policy FE3 includes within the "Urban District Centre" category, Great Stall West, including the NEV Neighbourhood Centre, West Swindon Centre and Orbital Park. This "urban" classification is appropriate and further conflicts with the contention that any part of NEV is "rural" or that future service provision with NEV has a distinct role in providing for a wider rural hinterland. As such all reference to NEV and its constituent villages should be deleted from this policy. To be properly justified and effective: • the Rural Service Centre category should delete Great Stall East, Lotmead, South Marston and Rowborough. • The Large Village category should delete Foxbridge and Redlands: these are not stand-alone settlements with a meaningful level of internal self-containment, much less any wider service function.



Respondent No: 584

1000

[REDACTED]

Q1. Title _____ Mr _____

Q2. First Name **Barry**

Q3. Last Name Glasgow

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

A 4x4 grid of 16 black horizontal bars. The bars are arranged in four rows and four columns. The lengths of the bars vary: the first row has two short bars; the second row has two medium bars; the third row has two long bars and two very short bars; and the fourth row has two medium bars and two long bars. The bars are black and have thin white outlines.

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

(SBC admin note: transcribed from scanned 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 S0488b 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.

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Respondent No: 585

1000

Q1. Title Mrs

Mrs

Q2. First Name Elaine

Elaine

Q3. Last Name Glasgow

Glasgow

Q4. **Job Title (where relevant)** not answered

not answered

Q5. Organisation (where relevant) not answered

not answered

This figure is a 2D bar chart consisting of 10 rows of data. The first 9 rows each contain 3 bars, while the last row contains 2 bars. The bars are black and of varying widths, representing data values. The bars are arranged in a grid-like pattern with some empty space between them.

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

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Respondent No: 586

[REDACTED]

[REDACTED]
[REDACTED]

Q1. Title Mrs

Q2. First Name Cara

Q3. Last Name Watson

Q4. Job Title (where relevant) Clerk to Planning, Conservation & Transport Committee

Q5. Organisation (where relevant) Cricklade Town Council

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

Q11. Where possible, please select which part of the Local Plan or accompanying document this representation relates to?

Policies Map
Chapter
Chapter 4 The Spatial Strategy & Strategic Area Policies Policies
Map SGL 06 North Tadpole

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

We note the potential for 513 new homes over the development period. Prior to the build out of the main Tadpole Farm development (1,695 homes) we raised concerns about the difficulty of those residents obtaining easy access to the A419 northbound. Using the Turnpike junction entails heading south and then doing a 1800 turn as well as dealing with the inevitable congestion there. Our concern was that drivers would instead use the B4553 through the centre of Cricklade. That possibility will still exist with any development on North Tadpole. We previously suggested a new junction on the A419 at the bottom of Blunsdon Hill but that is obviously not going to happen. From membership data we know that many residents of North Swindon use the facilities at Cricklade Leisure Centre which is welcome, as are those that use the shops (including two butchers) on our High Street. What is a problem are those drivers just using the town centre as a rat run to get to the A419. NB comments regarding North Meadow SAC are included in our response to CSE8

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.

Text to be added: Proposals for development should include measures to minimise rat running through Cricklade when accessing the A419 northbound.



Respondent No: 587

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Cara

Q3. Last Name Watson

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

Q11. Where possible, please select which part of the Local Plan or accompanying document this representation relates to?

Policies Map

Chapter

Chapter 8 A well connected, active, Swindon Policies Map Chapter

ST 1 Promoting Sustainable Transport Paragraph 9 Evidence base document e.g. the Sustainability Appraisal LCWIP 2022

Evidence base document e.g. the Sustainability Appraisal

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

National Cycle Network Route 45 goes through the middle of Swindon. The Local Cycling and Walking Infrastructure Plan 2022 has omitted to prioritise the upgrading of this route to achieve its full potential. The map (figure 5 in the Draft Plan) gives only a cursory reference to connectivity with places outside the SBC boundary. In particular, on the north western boundary the route follows the narrow and very busy Tadpole Lane for a distance of 1.3km to the junction of Tadpole Lane and Packhorse Lane (B4553). From there though, it is very safe cycling to Cricklade and then out to the Cotswold Lakes (Water Park). This would be very attractive for leisure users but commuters could use it also. Although most of the 1.3km is within the SBC boundary, the western section is a part of Wiltshire. Most of the users will probably be Swindon residents though.

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.

Suggested extra text: Proposals will be supported that improve National Cycle Network Route 45 through the town so that the full potential of the facility can be achieved. In particular improvements will be explored that enhance the safety for cyclists on Tadpole Lane thereby enabling safe access to Cricklade and the Cotswold Lakes on Route 45.



Respondent No: 588

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Cara

Q3. Last Name Watson

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

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Policies Map

Chapter

Chapter 9 An Environmentally Sustainable Swindon Policies Map

CSE 8 Biodiversity, Geodiversity and Nature Recovery Evidence

base document e.g. the Sustainability Appraisal North Meadow

SAC Interim Mitigation Strategy

Evidence base document e.g. the Sustainability Appraisal

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

Internationally Designated Sites: Paragraph 5 North Meadow and Clattinger Farm SAC This explains the requirements of the North Meadow Interim Mitigation Strategy (NMIMS) and the Policies Map shows the two Zones of Influence. Cricklade Town Council have challenged the effectiveness of the NMIMS and have requested that it be urgently amended. The fundamental problem is the two-tier approach to development proposals that are below 50 dwellings and those of 50 and above. The larger category is required to provide Suitable Alternative Natural Greenspace whereas the smaller sites can just make a financial contribution. There is the possibility of larger sites being disaggregated to take advantage of this two-tier treatment.

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

Add additional paragraph: d) On a single growth site - such as North Tadpole (SGL 06) - the requirement for Suitable Alternative Natural Greenspace shall apply to all developments on the site, even where some of them might individually be below 50 dwellings.



Respondent No: 589

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name David

Q3. Last Name Hutchison

Q4. Job Title (where relevant) Executive Director

Q5. Organisation (where relevant) Pegasus Group on behalf of Sarah Griffiths, Associate Planning Director, of Catesby Estates

[REDACTED]

Q11. Where possible, please select which part of the Local Plan or accompanying document this representation relates to?

not answered

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

SBC admin note: Please see attached representation

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

not answered

Representations in respect of the Swindon Borough Council Local Plan

Publication Stage (Regulation 18)

On behalf of Catesby Estates

Date: October 2025 | Pegasus Ref: P25-0736



Document Management.

Version	Date	Author	Checked/ Approved by:	Reason for revision
1	09-09-2025	MR/DH	DH	



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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, on behalf of our client we have previously promoted the site known as Land East of Blunsdon through a previous Call for Sites submission. The site is not proposed for allocation within the Local Plan and is listed within Annexe 7: Externally submitted sites not considered suitable to the Strategic Housing and Economic Land Availability Assessment (SHELAA). The site is a 18.4ha site covered by three references within the SHELAA (s0065, s0429 and s0562).
- 1.3. The site is also subject to a current planning application (ref. S/OUT/20/0096) that was originally submitted in January 2020 seeking outline planning permission for a residential development of up to 200 dwellings. Progress on this application stalled shortly after submission for reasons mainly relating to highway capacity at the Cold Harbour junction on the A419, however mitigation solutions have now been identified and agreed, and the Applicant has recently submitted a package of revisions to this planning application which are now under consideration. These are relevant to the representations and will be referenced below.
- 1.4. The 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

- 1.5. 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 site s0562 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.

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, 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.

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 East of Blunsdon (SLAA references s0065, s0429, s0562)

- 3.1. As set out in the first section above, our clients have been promoting this site through the draft Local Plan, and it is also subject to a current outline planning application.
- 3.2. The application, and these representations, concern an 18.4ha site that is shown on the Illustrative Masterplan included at **Appendix 1** (ref. P18-0467_08L). This is relevant as site reference s0429 is a larger site at 38.98ha that also covers land further north that includes Castle Hill Fort Scheduled Monument. The 'site' as referenced in these representations contains part of site s0429 but appears to relate most closely to s0562, albeit this site had a slightly smaller site area of 17.65ha.

Site Location and Description

- 3.3. The site in question is located to the east of the village of Broad Blunsdon which lies within 0.5km of the northern built-up edge of Swindon.
- 3.4. Broad Blunsdon is a predominantly residential village. It provides for a number of local facilities, including a village hall, local shop, doctors surgery, recreation ground, public houses, places of worship, and a primary school. A new community shop/café has been delivered on the land immediately to the west as part of the residential development of an additional 70no. dwellings on land off Sams Lane.
- 3.5. The 18.4ha site comprises three fields that are currently in agricultural use and separated and lined by hedgerows and groups of trees.
- 3.6. A public right of way crosses through the site from the north west corner along the western boundary of the northern most field before turning eastwards along the boundary between the north and south fields and then travelling in a south east direction diagonally across the eastern most field.
- 3.7. The site does not include any land which is subject to any statutory landscape or ecological designations. The Environment Agency's flood zone mapping shows that the site lies within Flood Zone 1 (lowest probability of flooding).
- 3.8. The Scheduled Monument Hillfort and lynchets on Castle Hill lies c.75m north of the site and Blunsdon Conservation Area lies c.140m west of the site. Two Grade II Listed Buildings are located at Upper Burytown Farmhouse c.245m north east of the application site.

Other Development Proposals in the immediate surrounding area

3.9. There is a live planning application for 100no. dwellings on land to the east of Sams Lane which the LPA resolved to approve in September 2025.

3.10. The land to the south of the application site (beyond the B4019) was originally allocated in the existing Swindon Local Plan under Policy NC5 as a "New Community" known as "Kingsdown" to provide a total of 1,650 dwellings with associated facilities. The LPA has resolved to grant outline planning permission on that land for a mixed use scheme including 1,552 dwellings. The emerging Local Plan is proposing the increase the allocation to 1,847 homes over the Plan period.

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

Application S/OUT/20/0096

3.12. The application was originally submitted in January 2020 seeking outline planning permission for a residential development of up to 200 dwellings. As set out above, progress on this application stalled shortly after submission for reasons mainly relating to highway capacity at the Cold Harbour junction on the A419. However, mitigation solutions have now been identified and agreed.

3.13. The application has also recently been amended to reduce the maximum number of dwellings proposed by the application to (up to) 150 dwellings. This has reduced the developable area of the site to 6.02ha, with the remaining parts of the site given over to green infrastructure by way of public open space (6.94 ha) and retained pasture land (4.62ha).

3.14. The Illustrative Masterplan that is included at **Appendix 1** is submitted to demonstrate how the site could deliver the scale and nature of the development that has been proposed. It demonstrates one way in which the development could be laid out to respond to the constraints and opportunities of the site.

3.15. The main components of the scheme are now as follows:-

- 2no parcels of residential development in the central and southern parts of the site, north and south of the retained public right of way.
- A strategic area of public open space at the northern part of the site to mirror the approach taken at Sams Lane to the west, creating a publicly accessible area of open space and a buffer between built development and the cemetery, the Hillfort and Burytown Lane.
- Retention of the former gun emplacement and pasture land to the east.

- Vehicular access from the B4019 and a proposed surfaced emergency access and pedestrian/cycle link to Burytown Lane to the north.
- Play space.
- Sustainable urban drainage systems (SUDs)
- Associated roads, car parking and other supporting infrastructure

3.16. The reduction in dwelling numbers has resulted in a number of changes from the original scheme. As discussed below, other changes should also be taken into account when reassessing the suitability of the site for allocation. These are as follows:-

- a. Pulling back of the line of built form away from the cemetery containing the Listed War Memorial, mirroring the arrangement of the now constructed development to the south-west of the site.
- b. Pulling back of the development further from the frontage of Burytown Lane, which provides dynamic views on the route to the Scheduled monument at Castle Hill.
- c. Pulling back of development from the north-eastern edge of the site, closest to the field which contains the non-designated gun emplacement.
- d. A single vehicular access lined with new landscaping between those previously proposed, within the field containing the gun emplacements, but further away than the previous potential secondary access.
- e. The inclusion of bungalows at the northern edge and part of the eastern edge of the development areas to reduce impact on adjoining heritage assets and create a softer transition to the adjoining countryside.
- f. Improvements to assist with accessibility with pedestrian and cycle links to Burytown Lane and along the B4019.
- g. Identification of off-site mitigation to mitigate traffic impacts.
- h. Biodiversity enhancements.

3.17. Overall, the proposals have been amended to positively respond to the landscape and heritage constraints and opportunities. The proposals ensure that the new built development assimilates with the site and its surroundings, and it offers opportunities to limit landscape and visual effects, respect the settings of designated and non-designated heritage assets, provide open space, landscaping and provide biodiversity and accessibility enhancements.

The findings of the SHELAAs

3.18. Given the number of sites that the SHELAAs needs to consider, it is acknowledged that this will always be a high-level assessment which is not comparable to what is made available with a planning application. Nonetheless, the SHELAAs has informed the draft allocations within Appendix 1 to the Local Plan and includes an assessment of the subject site.

3.19. SHELAAs site ref. s0562 appears to relate most closely to the subject site area (17.65ha); that of application S/OUT/20/0096. The note on suitability states:-

"Site located outside of settlement boundary. Parcel southern half of s0429. Hill Fort nearby. Significant concerns regarding heritage and landscape." (our emphasis)

3.20. The RAG analysis scores the site as Red on Landscape considerations and Amber for Heritage, Archaeology, Ecology, Regeneration and Location.

3.21. 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. In respect of the other concerns, the revisions to the application are relevant as follows.

Heritage

3.22. The planning application is accompanied by an addendum Heritage Assessment (September 2025). It explains that following consultation with the Council's Conservation Officer on site, it was agreed that the aforementioned revisions would address his main concerns. The updated conclusions that are set out in the Heritage Addendum confirm that:

- a. The development would result in no harm to the Broad Blunsdon Conservation Area or the Listed assets at Upper Burytown Farm.
- b. With regards to the Listed War Memorial, the proposed development will be set back from the wider cemetery in which the asset lies. No harm to the heritage significance of the Listed War Memorial is anticipated.
- c. With regards to the Scheduled Hillfort and Lynchets on Castle Hill, a low level of less than substantial harm to the heritage significance of the asset is anticipated, albeit reduced within that bracket from that identified previously, prior to the proposed revisions.
- d. With regards to the WWII gun emplacements, overall, very minor harm is anticipated to the heritage significance of the asset through changes in setting. This harm is lower within that bracket than previously proposed, due to the revisions to the access

and the footprint of development reducing the lessening of isolation that the asset will experience.

- e. A Conservation Management Plan of the gun emplacements is proposed.
- f. In addition, appropriate on-site interpretation boards will be provided, giving information on the history of the heritage assets and making a positive contribution in this regard to the Heritage Trail referred to in the Neighbourhood Plan³. These represent benefits of the application proposals.

3.23. It is acknowledged that there will still be some heritage harm, but it has been reduced further by the proposed changes to the application such that the harm is low/very minor.

3.24. With reference to the SHELAA findings, the revised proposals now ensure that there is no built development either on or immediately adjacent to the Hill Fort and a suitable buffer of public open space has been agreed on the site in consultation with the LPA's Conservation Advisor. Other heritage issues have also been discussed and agreed with the Conservation Officer and are now suitably addressed within application S/OUT/20/0096.

3.25. As the live planning application has demonstrated, the revisions to the scheme have reduced the level of heritage harm to, at most, low/very minor. We do not consider it to be any bar to the development of the site.

Landscape

3.26. Whilst the 'Red' rating within the SHELAA is acknowledged, it is important to note that no landscape objection has been raised in respect of application S/OUT/20/0096.

3.27. The revised planning application has also been accompanied by an updated Landscape and Visual Impact Assessment (LVIA) to reflect both the changes to the scheme and the changes to the wider site context as set out above. An LVIA obviously provides a far more detailed and reliable assessment than would have been undertaken as part of the SHELAA.

3.28. The key findings of the LVIA are as follows:-

- a. The landscape character of the Site itself would inevitably change from grassland to residential development. This would apply to any such site.

³ §1.21. of the Neighbourhood Plan explains that a key objective for the BENP is to protect and preserve these assets. The Neighbourhood Plan process revealed evidence of community support for a Blunsdon Heritage Trail around the parish highlighting heritage assets and providing information about the general history of the area and about the specific heritage assets. Full details of the trail are set out in Appendix D of the BENP. §6.12 identifies the Heritage Trail as a project meriting funding/enhancement.

- b. 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.
- c. The proposed built form would be set back from the Site boundaries, and the perception of the wider agricultural landscape would remain unchanged.
- d. The scale and form of the Proposed Development would be consistent with the existing residential areas of Broad Blunsdon, and indeed with the emerging settlement edge currently influenced by the residential development at Sams Lane.
- e. The Proposed Development has been judged to have a limited effect on the existing landscape character as expressed by the published landscape character assessments.
- f. The Site is contained entirely within existing field boundary hedgerow and tree vegetation. The proposed built form has been set back from the existing Site boundary vegetation to allow for the retention and enhancement of this vegetation to provide robust and strong landscape framework.
- g. This retained and strengthened boundary vegetation would provide substantial visual containment and would restricts views of the Proposed Development from the surrounding public highways and PRoWs.
- h. Out of the eight representative viewpoints, three of them have been assessed as experiencing Moderate Adverse Effects – Viewpoint 1, Viewpoint 2, and Viewpoint 4.
- i. The Site has a restricted visual envelope limited to the footpath across the Site, and to the northeast on Castle Hill, and very short sections of Burytown Lane in close proximity to the Site, views from Blunsdon Cemetery, although existing Site boundary vegetation is expected to partially filter views.
- j. Due to the orientation of many of the views obtained from the local PRoW network, the Proposed Development would not extend the visual envelope of the settlement of Broad Blunsdon, nor would it punctuate the skyline in views resulting in a Negligible Scale of Effect for Year 1 and 15 on the remaining five representative viewpoints.
- k. The Proposed Development, in the context of the existing new residential neighbourhood at Sams Lane, coupled with the residential scheme east of Sams Lane and the Kingsdown site, both with the resolution to grant planning permission would form a logical extension and round off the settlement edge of Broad Blunsdon.

3.29. Overall, the updated LVIA concludes that the proposals have been designed in such a way to ensure they comply with the relevant policies listed in the LVIA 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.

3.30. As such, the 'Red' rating for landscape is disputed and should be revisited. Planning application S/OUT/20/0096 has demonstrated that the landscape effects of the development, which are similar to the development of any greenfield site, are limited with the site being contained entirely by existing field boundary and tree vegetation. The set backs proposed allow for the retention and enhancement of this vegetation which provide a robust and strong landscape framework with strong visual containment.

3.31. The wider context of the site is also relevant. As is highlighted by the Indicative Masterplan, the site is located to the east and north of consented development. Land to the east of Sams Lane, directly west of the site, contains one built out parcel of housing and another where the LPA has recently resolved to grant planning permission for housing. Opposite the site is the Kingsdown allocation where the LPA has previously resolved to grant outline planning permission on that land for a mixed-use scheme including 1,552 dwellings. This is proposed to be allocated in the New Local Plan with overall housing numbers increased to 1,847.

3.32. The development of this site therefore offers the opportunity for a logical rounding off of the eastern edge of Blunsdon. The site projects no further north than development east of Sams Lane and no further east than Kingsdown. Its visual impact in terms of encroachment into the countryside is therefore very limited, as demonstrated by the lack of a landscape objection to the current planning application.

3.33. As such, it is not considered that the allocation of the site will result in any significant landscape harm. On closer analysis through an LVIA the 'red' rating within the SHELA is unjustified. The RAG methodology is not sufficiently granular to assess the site in the same way as the LVIA but the site is certainly no worse than Amber and is potentially Green.

Traffic and Transportation

3.1. DTA has prepared a Transport Technical Note (dated September 2025) that is submitted alongside the proposed revisions to the application. It responds to comments received from the Local Highway Authority on the original submission. It also provides an update on changes to the scheme since it was first submitted and the mitigation solutions that have been identified for dealing with Cold Harbour Junction.

3.2. The main findings are as follows:-

- In terms of the baseline, it confirms that the site is within reasonable walking and cycling distance of a number of facilities and amenities, as well as being located in

close proximity to bus stops, thereby, reducing the need for future residents to drive and have the choice of alternative travel modes.

- b. The baseline in this regard is also set to improve with the planned build-out of the strategic Kingsdown allocation which will provide additional facilities nearby.
- c. The revisions to the application proposals include a reduction in dwelling numbers. This will reduce traffic generation and in turn have implications for the level of mitigation that will be required.
- d. Whilst the application remains in outline with all matters of detail reserved including access, the Applicant has also sought to provide greater clarity on the likely site access arrangements for vehicles, pedestrians and cyclists.
- e. Further information is provided on improvements to offsite connectivity and also potential bus service improvements.
- f. It has been demonstrated that the proposals can deliver a new pedestrian footway along the B4019, as well as a supplementary link out onto Burytown Lane to the north for cyclists and pedestrians.
- g. The enhancements for pedestrians would require some modest offsite works to existing junctions to provide the necessary footway widths. All works proposed are either within land under the control of the applicant or within the limits of the adopted highway.
- h. The access arrangements can be designed so as not to prejudice the delivery of the Kingsdown development (nor be reliant upon its delivery).
- i. Agreed mitigation solutions for Cold Harbour Junction have been identified which would allow for 375 dwellings to be released in addition to early phases of development at Kingsdown. Even accounting for recent resolutions to grant planning permission there still remains surplus capacity for the application proposals in the short term. The cumulative effects would not therefore result in a severe impact on the road network nor have an unacceptable impact on highway safety.
- j. The Applicant is prepared to commit to a package of transport enhancements (including public transport) and mitigation measures including amongst other things a Travel Plan for the site.

3.3. Even if the short term highway solution with a capacity of 375 dwellings was to be taken up by other sites, development at Kingsdown will deliver other mitigation including the bridge

over the A419 which will in turn free up additional capacity in the medium to long term. This means that other land at Blunsdon is capable of being brought forward for development later in the plan period in any event.

Other Technical Matters

3.4. Planning application S/OUT/20/0096 has also demonstrated the following:

- a. An updated Ecological Appraisal has not identified any concerns that cannot be addressed through appropriate mitigation. It has been demonstrated that the site is able to deliver a Biodiversity Net Gain of circa 13%.
- b. The site is not a risk of flooding from any source. The site is in Flood Zone 1 and is therefore suitable in terms of fluvial flood risk, and it is at low risk of flooding from other sources. Surface water runoff can be sustainably managed and disposed of using SuDS techniques.

3.5. In summary, there are no technical constraints that should lead to a conclusion that the site is not appropriate for a housing allocation. 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.

The context of Blunsdon

3.6. 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).

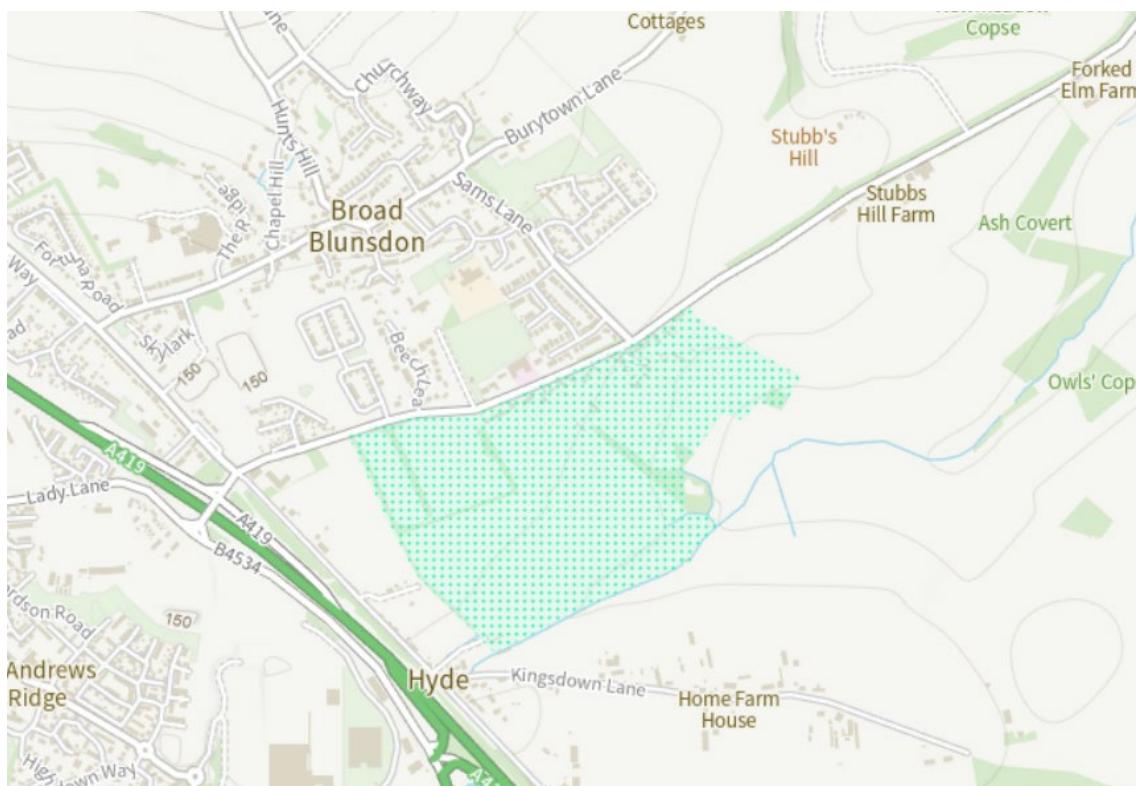


Image 1: Extract from current adopted Policies Map

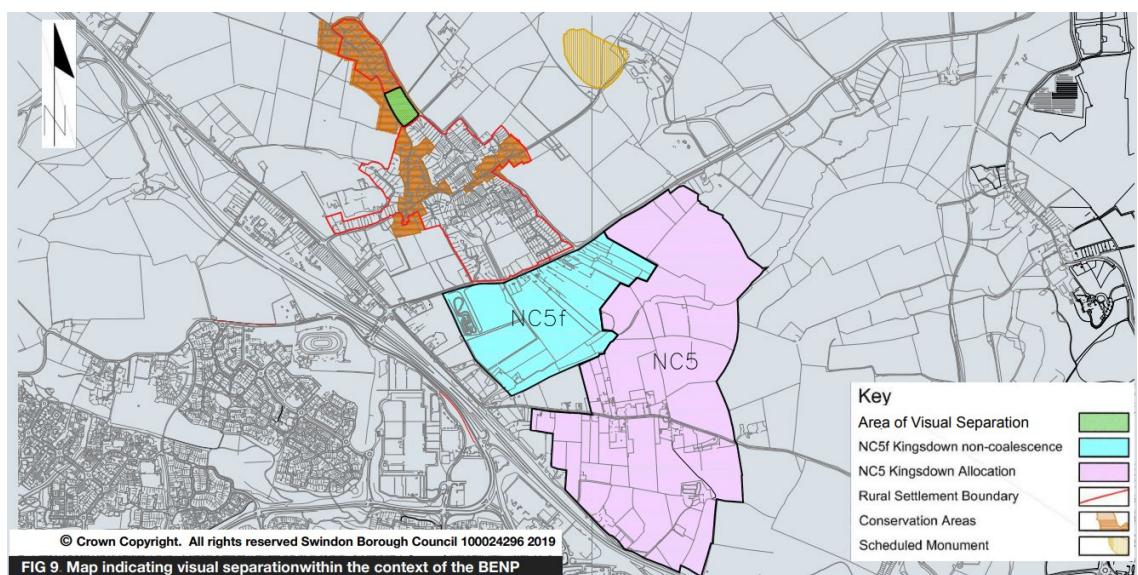


Image 2: Extract from Blunsdon Neighbourhood Plan

3.7. Draft Policy SS1 provides the spatial strategy of the draft plan. It confirms that the main focus for housing growth for Swindon will be within the Swindon Urban Area and Sustainable Development Locations (as designated on the Policies Map). Policy SS1 also identifies 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.

3.8. Table 1 at p.28 identifies the Settlement Hierarchy of the plan. Tier 1 is the Urban Area of Swindon. The Rural Service Centres including Highworth and Wroughton are at Tier 2. The Larger Villages are listed at Tier 3, and these include Broad Blunsdon. Below are the Tier 4 Small Villages and Hamlets.

3.9. Blunsdon is therefore a suitable and appropriate location for housing. This has been reflected in a number of previous planning decisions, including the very recent resolutions to grant planning permission at land east of Sams Lane and land north of Turnpike Road. It is also reflected in the Council's proposals to allocate further housing in and around Blunsdon.

3.10. It is also pertinent to note that land to the south of the application site at Kingsdown is allocated and the LPA has also resolved to grant planning permission meaning that new development is also being focused just beyond the southern boundary of the subject site. Once built out this will also change the perception of the transition about where built-up areas end and where countryside begins.

3.11. The Officer Report relating to land east of Sams Lane was cognisant of this changing context at Kingsdown to the south and Sams Lane to the north:-

“41. The application site is located outside of the Blunsdon settlement boundary, the eastern edge of which is located to the opposite side of Sams Lane. The site is therefore located in open countryside (in policy terms) and thus the development is in conflict with Policy SD2 of the SBLP, in that none of the exception criteria are met. However it must also be considered that the site is largely surrounded by existing development including residential development along Sams Lane to the east, to the opposite side of the B4109 and the new housing development immediately to the north. The site is also located in very close proximity to the Kingsdown Strategic Allocation (beyond the B4109 to the south east). In reality therefore the site is not truly in the open countryside.” (our emphasis)

3.12. Obviously, each site will have its own set of circumstances, but the approach taken above shows that Officers accept that the recent built development at Sams Lane to the north has changed the context for the site under consideration. Moreover, the impending changes that will be brought about with the Kingsdown allocation are also material considerations for other proposals in the area. These schemes will also change the physical and perceived context of the subject site as has been highlighted above.

3.13. More generally, the application site is located within 0.5km of the northern built-up edge of Swindon and its wide range of facilities, services and employment opportunities. Whilst the village of Blunsdon is separated from the Swindon urban area by the A419 its proximity from the Swindon urban area means it enjoys the same (if not better) access and proximity to

many services, facilities and employment opportunities as many parts of the Swindon urban area.

3.14. The village itself provides a Primary School, village hall, local shop, doctors surgery, recreational ground, public houses, places of worship and a hotel and is served by a bus service providing services to the Swindon urban area.

3.15. The recent Sams Lane development (LPA ref: S/OUT/18/0405/RA) has also delivered a community shop/café which has been very popular locally and increases the local facilities in a location close to the current application site boundary.

3.16. In this context it is also material that when considering the east of Sams Lane proposals, Officers made the following observation:-

"45. The village of Broad Blunsdon includes some facilities in a shop, café, place of worship, village hall, doctor's surgery, school, pub, hotel and recreation ground. As a result it could be argued that the proposal complies with paragraph 83 (Rural Housing) of the NPPF which detail: 'To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities' i.e. the new residents of the houses supporting the shop, café, pub etc through additional spending." (our emphasis)

3.17. The same would apply to the subject site.

3.18. The Indicative Masterplan demonstrates how the site can respond to the layout of the Sams Lane scheme particularly with regards to how it now mirrors the approach to the land surrounding the cemetery to the north and provision of public open space. It also demonstrates how the site can be integrated with the Kingsdown development.

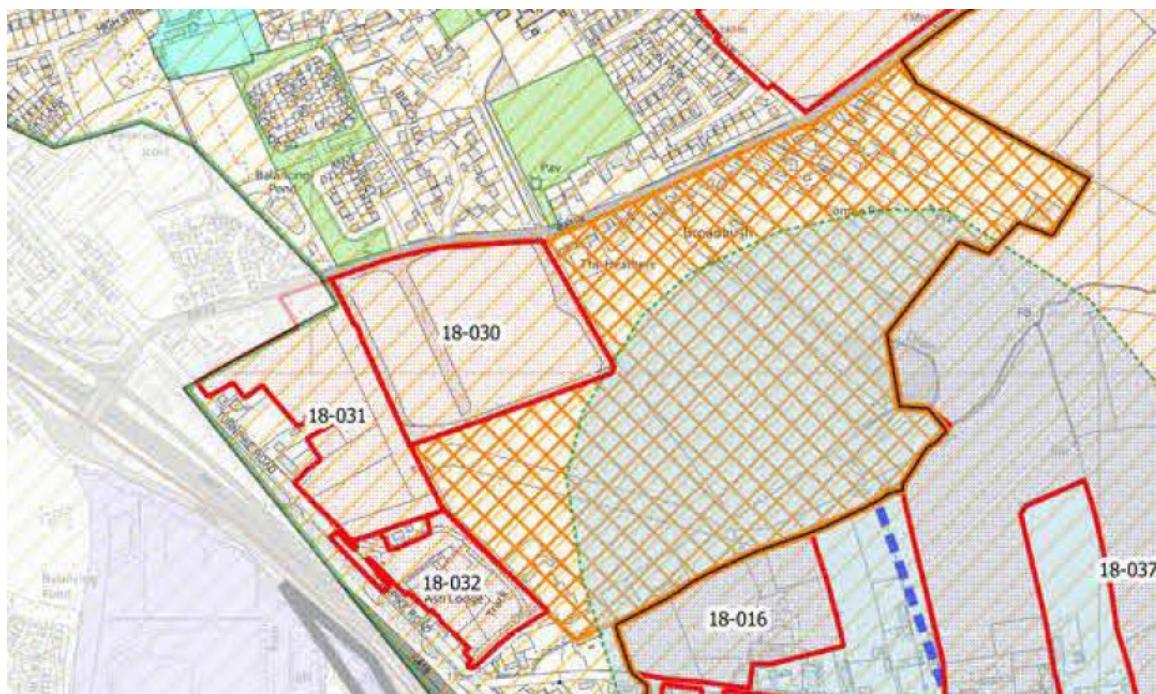
Proposed Housing Allocations

3.19. There is currently no draft policy or policies as such that allocate individual sites for housing, but Appendix 1 of the draft plan provides tables of proposed site allocations. These include, amongst others, 4no. sites at Broad Blunsdon with a combined capacity of circa 345 dwellings. They are:-

- a. Land at Sams Lane – circa 115 dwellings
- b. Land south of Highworth Road – circa 89 dwellings
- c. Land at Turnpike Road – circa 93 dwellings
- d. Land at 12 Turnpike Road – circa 48 dwellings

3.20. In respect of these, it is acknowledged that the LPA has already resolved to grant planning permission for Land at Sams Lane.

3.21. However, Land south of Highworth Road is located within the currently adopted Kingsdown Non-Coalescence Zone that is set by current Local Plan Policy NC5 and highlighted within the Blunsdon Neighbourhood Plan. As such, this allocation requires removing this portion of land from the zone, as is highlighted by the Council's Policies Map – see extract below, site reference 18-030 being Land south of Highworth Road.



3.22. As such, this proposed allocation is contrary to current adopted Local Plan policy and the Blunsdon Neighbourhood Plan and would result in coalescence with Swindon.

3.23. Our client's site is outside the Kingsdown Non-Coalescence Zone and as set out above has no constraints that cannot be addressed through a planning application. As such, the subject site is therefore considered to be a preferable site for allocation within the emerging Local 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 that is subject to planning application S/OUT/20/0096, most closely related to site reference s0562 within the SLAA 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 and can be developed in the 1-5 year period such that it can immediately assist with the 5YR HLS position. To summarise in respect of the site:

- a. A live planning application is currently with the Council for which an amended scheme is currently being considered, which has reduced the number of dwellings from 200 to 150.
- b. The revised scheme includes a number of amendments in order to address the impact of the development on heritage assets, such that the development would only result in low/minor heritage harm at the most. These amendments were agreed with the LPA Conservation Officer.
- c. No landscape objections have been made to the development, and in any event the revised LVIA demonstrates that landscape effects of the development, which are similar to the development of any greenfield site, are limited and comply with relevant policy.
- d. The surrounding context to the site will change with the implementation of further housing to the east of Sams Lane and subject site is therefore a logical rounding off of development to the east of Blunsdon. Its visual impact in terms of encroachment into the countryside is very limited.
- e. An interim mitigation solution is now available for the Cold Harbour junction in the short term and other mitigation including the bridge over the A419 associated with the Kingsdown development will provide other solutions in the medium to longer term such that there should be no concerns regarding deliverability during the plan period in any event.

- f. Opportunities also exist for sustainable transport choices in the form of walking, cycling and public transport.
- g. Blunsdon is a suitable and appropriate location for housing as demonstrated by the recent resolutions to grant planning permission and proposed allocations. The site is in a sustainable location with access to a range of services and facilities in Blunsdon and Swindon.
- h. 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.

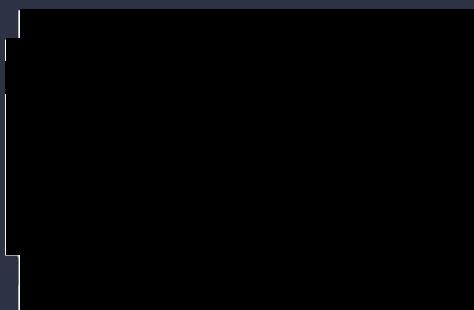


Appendix 1: Indicative Masterplan



LAND EAST OF BROAD BLUNSDON, SWINDON - INDICATIVE MASTERPLAN

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



Done.

DESIGN | ECONOMICS | ENVIRONMENT | HERITAGE | LAND & PROPERTY | PLANNING | TRANSPORT & INFRASTRUCTURE