



Respondent No: 285

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Eleanor

Q3. Last Name Ward

Q4. Job Title (where relevant) Spatial Planner

Q5. Organisation (where relevant) National Highways

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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

SBC admin note: Please see attached response.

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

not answered

Eleanor Ward
Spatial Planner
National Highways



Via email: SwindonLocalPlan2043@swindon.gov.uk

13 October 2025

Dear Planning Policy Team

Swindon Local Plan 2023-2043 Regulation 18 Consultation Draft

Thank you for providing National Highways with the opportunity to comment on the emerging Swindon Local Plan 2023-2043.

As you will be aware we are responsible for operating, maintaining and improving the Strategic Road Network (SRN), which in the Plan area comprises the A419 to the east of Swindon and M4 junctions 15 and 16. The purpose of the SRN, which is a critical national infrastructure asset, is to provide a safe, free-flowing and reliable highway network for strategic movements to support economic growth. It is based on these responsibilities that National Highways has provided the following comments.

Current Status of the SRN at Swindon

As identified by National Highways in previous Local Plan preparation work, the current Local Plan allocations, and the associated transport strategy/infrastructure, has not come forward in the way that was envisaged at the time it was adopted. The delivery of strategic allocations, including the New Eastern Villages and Kingsdown, has been delayed and several unallocated and speculative development sites have come forward, particularly along the A419 corridor. This context needs to inform the development of any new Local Plan spatial strategy for Swindon, considering its impact on the SRN and the implications for the delivery of necessary highways and transport infrastructure.

Several SRN junctions situated near Swindon on the A419 and the M4 are already constrained at peak times, and junctions on the A419 in particular can experience queueing and delay which can extend onto the mainline.

Policy Context and Evidence Requirements

National Highways is keen to ensure that transport and land use planning policy is closely integrated. In this respect, National Highways draws your attention to “*Planning for the Future - A guide to working with National Highways on planning matters*” and DfT Circular 01/2022 “*The Strategic Road Network and the Delivery of Sustainable Development*”, which sets out how we will engage with the planning system to support the delivery of sustainable development.

The National Planning Policy Framework (NPPF, December 2024) states that all plans and policies should be underpinned by relevant and up-to-date evidence. Whilst we recognise that work to develop the transport evidence base for this Plan is emerging, a thorough evidence base will be required for later stages of consultation and subsequently at Examination. This should include a transport strategy and transport assessment which identifies the highway and transport infrastructure necessary to deliver the Plan and address any severe and/or unacceptable safety impacts on the SRN, in this instance focusing on the A419 and M4 Junctions 15 and 16. This evidence base must conform with the NPPF and DfT Circular 01/2022. Any necessary infrastructure improvements will need to be included within an updated transport strategy and supporting Infrastructure Development Plan (IDP) with all mitigations clearly signposted in Local Plan policy.

The transport evidence supporting the Plan will need to consider the cumulative impact of the draft allocations alongside existing allocations. Based on this cumulative transport impact the Plan will need to identify any required improvements over and above those already planned and/or delivered.

It will be necessary for Swindon Borough Council, as a minimum, to:

- establish the transport needs of the emerging Plan in terms of both existing and proposed development, using a vision-led approach to identify transport solutions;
- assess the quality and capacity of transport infrastructure and its ability to meet the transport needs of the Plan;
- identify the transport proposals across all modes necessary to accommodate the transport needs of the Plan and fulfil the transport vision; and
- formulate development management policies to ensure that development comes forward in pace with the availability of necessary transport infrastructure.

In addition to the Swindon Local Plan, new Local Plans and updates are emerging in neighbouring authorities. Infrastructure improvements are also being implemented which will affect traffic flows at Swindon, including the A417 Missing Link. To ensure cumulative impacts are addressed, we request joint working with the emerging Local Plans in neighbouring areas and National Highways to support the delivery of sustainable growth.

SBC Local Plan 2023 – 2043 Regulation 18 Consultation Draft and SRN Considerations

National Highways welcomes the recognition that the new Local Plan (2043) needs to set out key transport proposals, linking with Swindon's Local Transport Plan 4 (2022), Swindon Bus Services Improvement Plan (2024) and the Swindon Local Cycling and Walking Infrastructure Plan (2022), and will embed a transport vision under the emerging Swindon Borough Transport Strategy. We look forward to working with the Council to review the transport evidence to support and validate the approach taken.

Vision

The emerging Local Plan has a 20-year horizon, however it contains a long-term 30-year vision to 2055. This identifies that Swindon's inward and outward connectivity will be improved and supported via key transport corridors, opening up opportunities for growth. National Highways endorse the recognition of the role of transport in achieving sustainable, well-planned growth.

The vision is supported by a series of missions for the Swindon Plan, including to 'Build a Greener Swindon', which acknowledges the policy requirement to move to a vision-led transport approach setting out clear priorities for supporting more active travel and public transport usage within the Borough. The mission feeds through to Strategic Objective SO5 (Connected Communities and Sustainable Movement), along with reference to sustainable transport in SO6 (Low Carbon).

National Highways support the sustainable transport ambitions of the plan, recognising that the spatial strategy is fundamental to achieving modal shift. By delivering sites with a transport strategy that reduces or eliminates the need to travel by car, this should reduce demand on the local road network (LRN) and SRN, and thus maintain a safe and efficient transport network. We look forward to working with the Council on the transport evidence base to test and verify the emerging transport vision for Swindon, identifying if there are any residual needs to strengthen and improve highway connections.

Spatial Strategy for Housing

The housing requirement for the plan period is identified as 24,100, and it is proposed this will comprise of:

- Net completions (23/24) – 831
- Planning Permissions Granted – 12,767
- Existing allocations in 2026 LP – 3,498
- New site allocations – 8,344

This provides a buffer of over 1,000 homes without any inclusion of windfall sites.

Policy SS1 sets out the spatial strategy approach for growth, focusing development in Swindon's urban area (providing up to 8,000 new homes, of which 4,347 are identified as allocations, and 6,000 new jobs) and strategic growth locations (New Eastern Villages, Wichelstowe, Kingsdown, East Wroughton and North Tadpole). Minor development is recognised in larger/small villages and hamlets. Comments on the proposed growth locations are provided below.

In reviewing the status of each proposed allocation we have referred to Appendix 1. There is some ambiguity in the definitions used in the associated tables, referring to 'pipeline' and 'outline commitments'. It would help if there was an explanation of the terms used to clarify the status of each of the sites being considered.

Urban area

National Highways acknowledges that growth focused in the existing urban area offers the best opportunity to achieve sustainable development and minimise additional demand on the SRN. We would expect however that there will be some residual SRN implication from the urban area allocations, particularly considering demand for longer distance trips. This matter needs to be evaluated in the supporting Local Plan transport evidence.

New Eastern Villages (NEV)

The emerging plan proposes to bring forward up to 10,000 homes to 2043 within the NEV area. In Appendix 1 it appears 144 dwellings are identified as new allocations, with 9,245 homes as pipeline commitments/existing allocations. The current Local Plan (2026) proposed a total of 8,000 dwellings in Policy NC3.

As previously identified, the current Local Plan and the associated transport strategy/infrastructure has not come forward in the way that was envisaged at the time it was adopted. The delivery of NEV has been delayed and unplanned/speculative development proposals have been permitted along the A419 corridor. Whilst infrastructure improvements have been delivered, we look forward to working with the LPA to enable an up to date assessment of the impact of the residual NEV allocation (i.e. the quantum of development not yet permitted and which will be brought forward in the new local plan period) on the SRN. This should be included within the local plan transport evidence base and any necessary infrastructure, which may include improvements 'over and above' those currently considered, should be identified within the policy and IDP.

We note the NEV allocation boundary is slightly extended in the latest proposed policy map, with the allocation extending northwards across the A420 alongside the A419 White Hart junction. National Highways have land interests adjacent to our network. If the LPA require

further information regarding this they should contact

We approve of the inclusion of draft Policy CSE12: Reducing Noise and Pollution, and the need to ensure noise sensitive and air-quality sensitive development is directed to appropriate locations. We consider this policy relevant to the NEV allocation, with a significant land boundary along the A419 Trunk Road. We have recent examples of residential development experiencing noise issues due to being located too close to the SRN. We encourage and endorse planning policy being proactive in considering and addressing this issue to ensure the health and wellbeing of future residents.

In addition to noise impacts, given the proximity of allocations to the SRN boundary, we would also draw attention to the importance of ensuring that drainage, landscaping and boundary treatment proposals are considered from the outset, and that development proposals are designed in accordance with DfT Circular 01/2022. All noise fences, screening and other structures must be erected on the developer's land, and far enough within the developer's land to enable maintenance to take place without encroachment onto highway land.

It is noted that the NEV IDP Prioritisation Matrix (approved at Planning Committee in 2017) is included in Appendix 5. For clarity it would be helpful if an extra column was added to explain the latest status of the schemes listed, particularly identifying what elements have already been implemented.

Kingsdown

A total of 1,847 homes are identified in Kingsdown sites, with 170 being from new allocations. Adjacent to the strategic Kingsdown allocation boundary there are four other 'additional new' allocations identified, which include site references 18-029, 18-030, 18-031 and 18-032. These amount to an additional 345 homes at this location. Whilst not technically within the Kingsdown allocation, the travel demand characteristics of these sites, and pressure on the SRN, will be the same as the strategic allocation.

As recognised in the Swindon Regulation 18 IDP (August 2025), it has already been identified, and committed in policy, that growth in and around the A419 Blunsdon junction will require improvements to mitigate otherwise unacceptable impacts on the SRN. A package of measures – including an overbridge of the A419 – has already been identified as necessary for the strategic site at Kingsdown. In respect of live speculative applications at Blunsdon, improvements on the B4534 Lady Lane have been identified as necessary to allow a limited amount of additional development to come forward in advance of the full Kingsdown package of measures.

Development management decisions in this location are challenging due to uncertainty/potential delays associated with the identified Kingsdown mitigation. Whilst some improvements have been identified to unlock a limited amount of growth we encourage the LPA to consider the delivery strategy at this site to ensure strategic infrastructure is delivered in a timely way to enable development in this location.

Similar to the NEV strategic growth location, the Kingsdown site is adjacent to the A419. Previous comments relating to noise and asset implications are therefore equally relevant.

Wichelstowe

The Wichelstowe allocation proposes to carry forward 1,620 homes from the Local Plan 2026.

National Highways has worked with the relevant highway authorities and developers to bring forward improvements at M4 J16. A southern connection from the site towards the B4005 and M4 J16 is constructed but yet to be opened to traffic.

National Highways are reviewing evidence for the Wiltshire Local Plan, which considers pressures at M4 J16. In carrying out this work we have liaised with Swindon Borough Council regarding transport assumptions for Wichelstowe. We would welcome further discussion with the LPA to consider how local plan policy can maximise sustainable transport modes at this location whilst also managing impacts on the SRN, to ensure the SRN is used appropriately to facilitate long-distance trips. We anticipate this matter will be further discussed and addressed through our joint work on the transport evidence needed to support the Local Plan 2043.

Similar to the NEV strategic growth location, this site is adjacent to the M4. As previously stated, our comments relating to noise and asset implications are equally relevant.

East Wroughton

The emerging Local Plan identifies 1,031 homes at East Wroughton, within sites that are all new allocations.

This growth is to the south of the M4 and to the east of the existing large village of Wroughton, with access to Swindon facilitated by the A4361 using the LRN. The implications of growth in this location will need to be considered in the supporting transport evidence, however we recognise the impacts on the SRN will be more dispersed than other strategic growth locations.

North Tadpole

North Tadpole is identified to bring forward 513 new homes over the plan period. This is provided within a single new site allocation. Development has occurred in this broad location previously, through the Tadpole Farm allocation.

National Highways will need further information regarding the proposed access strategy for this allocation to enable us to advise the LPA regarding its likely acceptability. We note that a potential new junction on the A419 is mentioned in the 'Transport Vision Paper: draft 2025' relating to the Tadpole cluster. It should be noted that the policy for new connections on the SRN is provided by DfT Circular 01/22, which states:

"New connections (for example, new junctions or direct accesses) on the SRN lead to more weaving and turning manoeuvres, which in turn create additional risk to safety and reduce the reliability and efficiency of journeys, resulting in a negative impact on overall national economic activity and performance.

On this basis the principle of creating new connections on the SRN should be identified at the plan-making stage in circumstances where an assessment of the potential impacts on the SRN can be considered alongside whether such new infrastructure is essential for the delivery of strategic growth. Moreover, the company will need to be satisfied that all reasonable options to deliver modal shift, promote walking, wheeling and cycling, public transport and shared travel to assist in reducing car dependency, and locate development in areas of high accessibility by sustainable transport modes (or areas that can be made more accessible) have been exhausted before considering options for new connections to the SRN. There may also be limited opportunity for new connections to be considered as part of public funding programmes to support new development, although necessary infrastructure in up-to-date plans and strategies should be favoured in such instances".

Further discussion on this matter is required. Growth at the adjacent Tadpole Farm was required to provide improvements at A419 Blunsdon junction, a location still operating under constraint with various development pressures. It is anticipated that similar issues will be experienced with this allocation and some level of mitigation may well be required.

Transport evidence will need to clarify the proposed access strategy for this site and demonstrate how it can be brought forward in compliance with DMRB requirements and without adverse safety impacts on the SRN.

We note the North Tadpole allocation includes land within National Highways ownership (outside the red site boundary). If the LPA require further information regarding this they should contact [REDACTED]

Similar to the NEV strategic growth location, this site is adjacent to the A419. Previous comments relating to noise and asset implications are equally relevant.

Urban Regeneration Areas

Marlowe Avenue and Pipers Way are identified as urban regeneration areas supplying 1,820 homes. These are new site allocations within the urban area of Swindon. We anticipate these sites will be included in transport evidence to support an understanding of the cumulative impact of the Local Plan proposals on the SRN.

Other new site allocations

Nine other sites are identified for allocation. Four of these have been considered under the Kingsdown strategic growth location. The remainder amount to 339 homes.

Sites 18-033, 18-034, 18-035 and 18-036 are all within the urban area of Swindon and, like the regeneration areas, their impact should be accounted for within transport evidence. Site reference 18-028 is within the market town of Highworth, allocating 53 homes. The location and scale of this development is not considered to be a strategic concern for National Highways.

Economic Growth

The location of employment sites is as important to National Highways as the location of housing sites, as employment development often contributes significantly to peak hour traffic. There can be challenges in accommodating high levels of trip demand on the SRN, which may only exist for limited periods of the day. The attraction to business of locating in highly accessible locations is recognised, and we are aware that many businesses would like to be located close to the SRN.

The emerging plan provides for a net increase of 640,000sqm of industrial floorspace and 72,000sqm of office space over the plan period. Large office developments are directed towards Swindon town centre and the NEV growth/transit corridor. A number of industrial locations are identified on the policy map, and it is considered that a significant portion of the industrial growth can be accommodated at Panattoni Park. Mitigation at the Rat Trap junction and contributions to wider transport elements on the A419 were identified as part of the planning consent for Panattoni Park. We understand these are progressing, however we would expect the local plan to reflect these infrastructure requirements if it is assumed that the Panattoni Park site will be delivering local plan employment needs.

We look forward to further work on the local plan transport evidence base to identify the impact of the economic aspirations of the plan and how this can be accommodated, which will enable us to interpret potential impact on the SRN.

Well-Connected Swindon

A chapter of the emerging plan is devoted to ensuring transport links are provided to ensure a well-connected and healthy Swindon, recognising that transport is one of the key building blocks for economic and sustainable development. A more detailed strategic Transport Impact Assessment is proposed to support the Regulation 19 version of the plan. We welcome the LPA's recognition of the need to work closely with National Highways in the development of Swindon's transport assessment and strategy.

National Highways support the policy drafting of SP5 to take a 'vision-led' approach to transport, seeking to deliver sites with a transport approach that reduces or eliminates the need to travel by car, which should reduce demand on the LRN and SRN, and thus maintain a safe and efficient transport network.

It is identified that additional rail and freight hubs will be explored, at 'Swindon Parkway Station East of Swindon/South Marston' and 'Royal Wootton Bassett / South Swindon'. Such proposals will alter demand on the SRN and we request to be a partner in any feasibility testing/business case development to ensure potential impacts on the M4 and A419 are fully understood. Land is also proposed to be safeguarded for long-term aspirations for rail freight.

Policy ST2 proposes the installation of mobility hubs or park and ride infrastructure at strategic sites post 2035, identifying M4 J16 as a potential location. Any such proposal needs to be fully considered, with implications quantified in transport evidence to ensure the success of the proposal and that the safety and function of the SRN is not compromised.

The Local Cycling and Walking Infrastructure Plan (2022) is included in this section of the emerging local plan. We suggest that as the infrastructure components of the emerging local plan mature this should be updated to reflect all schemes needed to support the local plan transport vision; for instance we note that the Great Stall Bridge and Kingsdown Bridge are not currently included within this plan.

We look forward to discussing the details of the transport vision for Swindon and transport evidence in more detail in the coming months to ensure findings are available to inform the Regulation 19 version of the plan.

Environmental Sustainability

It is noted that the plan includes policies and proposals to achieve a 'Greener Swindon'. National Highways acknowledges that taken as a whole, transport is the single biggest carbon emitter in the UK, with road transport forming the majority share. Working together we need to ensure that transport enables economic activity in an environmentally responsible and sustainable way. National Highways' approach to planning is shaped by our corporate commitments to net zero, which aims to eliminate corporate carbon emissions by 2030, maintenance and construction carbon emissions by 2040 and road user carbon emissions by 2050.

Delivery and Implementation

National Highways agree with the plan text which identifies that relevant infrastructure is required to unlock growth and underpin sustainable development. We look forward to working with the LPA in developing infrastructure requirements that will inform site proformas for the Regulation 19 version of the plan – to ensure SRN interests are appropriately captured.

We endorse policy D1 which prioritises the delivery of road and transport infrastructure to unlock sustainable growth above other infrastructure requirements. National Highways will be unable to support growth that has a safety implication on the SRN and is not appropriately mitigated.

We flag that the timing of infrastructure should keep pace with development growth, and in some situations may be required to unlock further growth. In some locations on the SRN surrounding Swindon we are in a position where we require highway infrastructure improvements to unlock any further growth. With regards to sustainable transport improvements, early delivery will support the uptake of sustainable transport mode use. We encourage SBC to consider this further in their delivery strategy for the emerging Local Plan.

Transport Vision Paper: Draft 2025

National Highways endorse the work undertaken to commence development of a transport vision for Swindon, which will enable the Local Plan to contain the appropriate policy commitments to facilitate sustainable development.

We note that issues associated with the A419 towards north Swindon, and cumulative pressures at M4 Junction 16 to the south are recognised. Comments associated with the potential new junction on the A419 for the Tadpole cluster are provided above, under the 'North Tadpole' subheading.

We anticipate that through the identified workstream of transport modelling and the development of a transport evidence base, the implication of the emerging Local Plan proposals on the SRN will be quantified. This will enable us to provide more detailed advice regarding acceptability and necessary infrastructure required to facilitate the development proposals. We look forward to working on this workstream together to inform the Regulation 19 version of the Local Plan 2043.

Infrastructure Delivery Plan Report (Regulation 18)

SBC have commissioned AECOM to produce an Infrastructure Delivery Plan (IDP) for which National Highways have been contacted for contribution. We note our input has been documented in this first draft of an IDP. We commend the progress made on this workstream and look forward to contributing further once the transport evidence base and associated Transport Impact Assessment workstream develops. Whilst the IDP currently seeks to identify the impacts of specific allocations on specific SRN components we would also stress that the local plan assessment work will also need to identify if cumulative impacts are an issue needing to be addressed.

The draft IDP identifies issues associated with freight at and around Swindon. We welcome ongoing discussion regarding approaches proposed by the LPA to address this matter.

National Highways endorse the prioritisation of infrastructure topics, which recognises that highways and public transport are Category A, needed to unlock development. As identified earlier in this correspondence, the Swindon authority area has SRN pressures which could inhibit the delivery of further development growth without mitigation.

It is identified that National Highways is a potential funding source for highways improvements in Swindon. The Roads Investment Strategy (RIS) programme is the Government's primary means of investing significantly in the SRN. This provides 5-year programmes of funding to enable National Highways to operate, maintain and enhance the SRN in the context of the key priorities set out in each RIS. Whilst each RIS cycle invests significantly in the SRN it is unable to fund all required mitigation to support development.

The next RIS (2026-2031) is currently published in draft form, with a final version due to be issued no later than March 2026. Whilst investment plans are yet to be clarified, we are aware that an increased emphasis will be placed on maintenance and renewal schemes.

To effectively discuss SRN cross border issues, we would welcome Wiltshire Council being added to the Stakeholder Engagement List, relating to the sub-category of 'roads'.

We look forward to working with SBC and AECOM in the next iteration of the Infrastructure Project Schedule, informed by the Transport Impact Assessment, to ensure SRN related

schemes are identified with appropriate costs assigned – this will inform the viability and deliverability of the proposed sites.

Summary

We trust the above comments are helpful in shaping the next draft of the Swindon Local Plan 2043. We anticipate before the Regulation 19 plan is prepared that a comprehensive transport evidence base will be forthcoming on the emerging plan's impacts on the highway and transport network. On review of this information, we will be able to further advise regarding SRN requirements for plan policies and supporting evidence documents. We look forward to engaging further with the Council and their consultants as the plan and transport evidence base develops.

If you require further clarification regarding this response, please do not hesitate to contact us.

Yours faithfully,

[Redacted signature]

Eleanor Ward

South West Operations – Spatial Planning Team

[Redacted contact information]



Respondent No: 286

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Q1. Title

Mrs

Q2. First Name

Andrea

Q3. Last Name

Parkinson

Q4. Job Title (where relevant)

Teacher

Q5. Organisation (where relevant)

Aspire Tuition

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

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

This section references the following documents – 1. 08.01_Landscape_sensitivity_assessment-2.pdf 2. 06.01_Green_infrastructure_strategy_2024_Part1.pdf 3. 03.04_Strategic_Housing_and_Economic_Land_Avai.pdf S0488 and S0488b – Highworth Old Golf Course We are pleased that Highworth's old golf course is not included within this Local Plan for housing development, and that the site is mentioned in the "01.02 Policies map Borough" as "Open Space". The bottom section – S0488 This section is designated as 'red' on the "Landscape Assessment Document" meaning it is a sensitive landscape site which holds recreational value. The top section - S0488b This section is not designated 'red' on the "Landscape Assessment Document", which under planning regulations, does not afford it the protection we seek. Only "Local Green Space", as sought by Highworth Town Council in their Draft Neighbourhood Plan 2, would provide that protection. This top section actually provides greater recreational value, due to its accessibility from the Town Centre (easy flat walking distance), along with how popular this part of the site is to Borough residents. S0488 and S0448b is special to Highworth and Borough residents, because – S0488b – Top northern section 1. The land includes a flat, well-drained top section that is easily accessible for those who are less mobile, and is also suitable for pushchairs and wheelchairs. 2. The land lies within easy walking distance of Highworth town centre. By contrast, site S0488 occupies the lower, more distant section, which may be less accessible for some people 3. Highworth Town Council, working with a group of local residents, has submitted a proposal to transform the entire site into a Nature Park. The plan includes a nature-themed café, making use of the former golf shop building, as well as a natural burial ground. This scheme demonstrates how the site could generate income for the Borough while delivering significant community and environmental benefits. 4. This is the only piece of publicly owned accessible land that can be used for a nature park within the Borough. 5. The panoramic views stretching across to the Marlborough and Wessex Downs are a unique feature of this publicly accessible land, with no other spot in Highworth offering a similar outlook. 6. Housing on this site would irreversibly damage the lovely views of the medieval town for people approaching Highworth. 7. Since SBC allowed the public golf course to close in 2019, the site has seen a huge increase in people using it for their daily exercise, mental health and wellbeing. It has been recorded that on average, around 500 people use the old golf course every day for their exercise. 8. A petition of local residents in 2022 received 4540 signatures, not to build on the old golf course. The campaign to save Highworth's old golf course also has a Facebook page of over 1600 members. 9. Highworth's setting as an ancient hilltop town would be destroyed if any housing were to be allowed on S0488b and S0488 10. The New Local Plan only shows one site for development off Lechlade Road (Reg 18 Site Allocation 18-030), which gives a skewed picture of the sizable developments that are planned, recently completed, or under consideration for Highworth. 11. The same site was withdrawn from the previous SBC Draft Local Plan in 2021, due to public pressure. A record number of resident responses were made to the local Plan at that time, for this site. For example, the 03.04 Strategic Housing and Economic Land Availability Assessment_annex 1 map.pdf shows the following developments likely or underway for Highworth – • S0482 David Wilson Homes - 237 houses • S0109 Land adjacent to Aldi – 90 houses and a care home • S0293 Land west of Lechlade road – 40 houses • S0042 Land west of Lechlade road – 53 houses • S0547 Land at Hampton Hill – 99 houses • S0467 Land east of Rounds Hill Mead – 250 houses *see note 1 below • S0518 Land at Twelve Oaks Golf Course – unknown *see note 2 below In addition to the above, the following is also not shown on the same document above, all of which are planned, under construction, under consideration or completed in recent years. • NEW Land at Shrivenham Road 43 (see note 3 below) • Backhouse Phase 1 Swindon Road (completed 2024) – 67 houses • Backhouse Phase 2 Swindon Road – (Currently under construction) – 43 houses • RagView – Shrivenham Road – Built by Persimmon Homes 2019 – 50 homes The scale of these developments is excessive for the small ancient hill top town of Highworth. This New Local Plan regulation 18 document is also misleading in terms of the number of new houses likely for Highworth, which should be corrected. Note 1 – An active planning application is open for the S0467 Round Hills Mead site (S/OUT/25/0664 - Outline application for the erection of up to 250 dwellings (including affordable homes), points of connection of access roads from A361)). Site S0467 is shown on the SHELTA 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: 287

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Laura

Q3. Last Name Cutter

Q4. Job Title (where relevant) Deputy Clerk

Q5. Organisation (where relevant) Haydon Wick Parish 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.

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

Haydon Wick Parish Council

Consultation Response to the Draft Swindon Borough Council Local Plan 2023–2043

1. Local Vision Statement

The Parish Council's vision is to maintain a balance between urban development and green space, ensuring Haydon Wick ward and Priory Vale ward remain well connected, liveable and resilient communities. New developments across Swindon should not lead to increased congestion, surface water flooding or environmental pressure on this area.

Growth must bring with it the infrastructure, flood alleviation measures and community investment needed to sustain a good quality of life. This includes protecting and enhancing local assets such as Mouldon Hill Country Park, Seven Fields Nature Reserve, Clifford's/Haydon Meadow.

This vision supports Swindon Borough Council's wider objectives but places emphasis on shared responsibility for infrastructure delivery and environmental protection. Growth must not come at the expense of existing communities.

Positive elements:

- Recognises the value of balanced urban and green environments
- Supports borough housing needs while protecting local character
- Identifies specific community assets for protection

Negative elements:

- Current plan places pressure on existing communities
- Infrastructure and flood mitigation not guaranteed
- Risk of loss of local environmental quality

2. Spatial Strategy and Growth Areas

The parish is directly affected by growth at Tadpole, Kingsdown and Blunsdon. These developments increase traffic, place pressure on drainage systems and risk fragmenting ecological corridors. While new homes are needed, infrastructure must come first.

These sites will generate additional demand on Thamesdown Drive, Cold Harbour Junction and the A419, which are already operating at capacity. They also impact water catchments linked to River Ray and Haydon Brook, increasing flood risk downstream.

Growth can bring opportunities. New residents strengthen the local economy, support shops and services and help create a more vibrant community. Without matching investment in transport, flood mitigation and green space, these benefits will be outweighed by pressure on existing infrastructure.

Positive elements:

- Acknowledges housing need and economic contribution of growth
- Recognises strategic locations of Tadpole, Kingsdown and Blunsdon
- Opportunity to align infrastructure investment with new development

Negative elements:

- No funded infrastructure to support these allocations
- Increased congestion and flood risk
- Biodiversity and green corridors under pressure
- Cumulative impacts not addressed in the plan

3. Design Quality, Character and Heritage

New developments must learn from past mistakes. Car ownership remains the dominant form of transport in North Swindon. Inadequate parking provision in earlier developments has led to unsafe parking, blocked pavements and frustration for residents.

Future design must acknowledge current behaviour and provide sufficient parking, safe walking routes and appropriate landscaping. This is essential for liveability.

The heritage and identity of the parish are shaped by Mouldon Hill Country Park and the Swindon and Cricklade Railway, which provide a strong local sense of place. These assets should be considered when planning nearby growth.

Positive elements:

- Acknowledges importance of practical design standards
- Recognises value of local heritage assets
- Supports better landscaping and integration

Negative elements:

- Earlier developments failed to meet parking demand
- Poor integration with heritage and green assets
- Design policy remains too general

4. Housing Mix and Affordability

The parish has seen rapid housing growth dominated by similar housing types, creating limited choice for different age groups and income levels. Affordable housing remains a concern, with many residents priced out of the area they grew up in.

The plan should provide a better mix of homes, including affordable starter homes, accessible properties for older residents and housing that meets the needs of a changing population.

Rapid growth has outpaced the delivery of infrastructure, placing strain on roads, schools and community facilities. Future housing must be balanced with service provision and environmental protection.

Positive elements:

- Recognises housing diversity as a priority
- Highlights affordability challenges
- Links housing growth to infrastructure capacity

Negative elements:

- Lack of variety in housing stock
- Limited affordable and accessible housing

- Infrastructure has not kept pace with development

5. Infrastructure and Phasing

The Local Plan recognises the need to align infrastructure with housing growth. References to Thamesdown Drive, Lady Lane, active travel and bus services show awareness of where key pressure points exist.

The Infrastructure Delivery Plan is incomplete and unfunded for northern schemes. There is no clear commitment to extend Thamesdown Drive to Great Western Way. This missing link is one of the most critical infrastructure gaps in Swindon. Cold Harbour Junction is a long-standing bottleneck with no allocated funding. Tadpole Garden Village and Burcot Farm will add pressure to the A419, but the plan contains no access improvements to match.

Fibre broadband was retrofitted in Priory Vale years after homes were occupied. Pavements were dug up repeatedly, causing damage and shortening their lifespan. Utilities and transport must be installed from the outset, not as afterthoughts.

Positive elements:

- Recognises Thamesdown Drive and key travel corridors
- Mentions active travel and bus service improvements
- Aligns with TR1, TR2 and IN2 on sustainable infrastructure
- Acknowledges infrastructure must accompany growth

Negative elements:

- Infrastructure plan incomplete and unfunded for northern schemes
- No Thamesdown Drive extension to Great Western Way
- No Cold Harbour Junction upgrade
- No A419 access improvements for Tadpole and Burcot Farm
- No phasing triggers tied to occupation
- Pavement damage due to late broadband installation
- No strategic funding for northern routes
- Allocations near Kingsdown and Blunsdon lack infrastructure plan

6. Biodiversity, Nature Recovery and Green Space

Policies CSE8, EN1 and EN2 provide a framework for biodiversity net gain and green infrastructure. Recognition of Mouldon Hill Country Park as a strategic site is welcome.

The plan fails to protect many other valued local spaces. These must be explicitly named and safeguarded:

- Mouldon Hill Country Park as a major biodiversity asset
- Clifford's Meadow and Haydon Meadow as nationally important wildlife sites
- Seven Fields Nature Reserve as a key ecological and community space
- All parish managed open spaces and play areas
- Goodearl, Rose Walk and Ventnor Close allotments as key food resilience and biodiversity sites

Biodiversity net gain must be delivered locally. Off-site delivery denies communities environmental benefits. Ecological corridors between Tadpole Field, Seven Fields, Mouldon Hill and Clifford's Meadow must be mapped and protected.

Positive elements:

- CSE8 biodiversity net gain target
- EN1 and EN2 link green space, health and climate
- Mouldon Hill strategic recognition
- Borough canopy target aligned with Great Western Community Forest

Negative elements:

- Clifford's Meadow, Seven Fields and allotments not mapped or protected
- Off-site biodiversity net gain allowed
- No ecological corridor mapping
- No parish canopy reporting
- Allotments not protected
- Habitat fragmentation risk
- No biodiversity monitoring at parish level

7. Climate Resilience and Surface Water Flooding

Flooding affects Haydon End, Oakhurst, Abbey Meads and Tadpole Garden Village. EN6, EN1 and EN2 set objectives but lack enforceable standards. The evidence is outdated and does not reflect repeated flood events since 2016.

Hotspots such as Thames Avenue, Queen Elizabeth Drive and Tadpole Lane have experienced repeated failures. Abbey Meads floods after storms. These are not mapped or prioritised for action.

SuDS are inconsistent. In Tadpole Garden Village, basins were left unadopted and poorly maintained. Developers have used underground tanks instead of natural infiltration. Older estates rely on traditional drainage. Without clear standards and adoption frameworks, SuDS will not be reliable.

There are no measurable standards for permeable surfaces, canopy cover or shading. Mouldon Hill is isolated from surrounding areas and tree planting commitments have been scaled back. Green corridors are fragmented.

No SuDS register exists. Responsibility is split between developers, management companies and the Borough Council. Growth at Kingsdown and NEV will increase pressure on River Ray and Haydon Brook. Policy IN2 covers potable and foul water but not surface water capacity.

The evidence base predates major flood events and monitoring has not been published.

Positive elements:

- EN6, EN1 and EN2 provide a base framework
- Green infrastructure recognised as part of the solution
- Mouldon Hill identified as a strategic green site

Negative elements:

- Outdated flood risk evidence
- Hotspots not identified or prioritised
- Weak SuDS standards
- No adoption framework
- No measurable design standards
- No borough surface water strategy

- Cumulative impacts unaddressed
- Green commitments delayed
- No SuDS register
- Fragmented responsibility

8. Air Quality, Noise and Pollution

Traffic is the primary source of air and noise pollution in Haydon Wick and Priory Vale. Pressure on Thamesdown Drive, Lady Lane and the A419 affects homes, schools and green spaces.

The plan should include commitments to ongoing monitoring and improvement. Tree planting, EV charging, active travel routes and low emission infrastructure can mitigate harm. Air quality improvements must be sustained over time.

Positive elements:

- Recognises traffic pressures
- Encourages investment in cleaner transport
- Supports environmental improvements

Negative elements:

- No specific commitments in the plan
- Monitoring arrangements unclear
- Air and noise quality likely to worsen without action

9. Fair Funding and Delivery

Section 106 and CIL obligations have often been reduced through viability claims, shifting maintenance of parks, allotments and bins to parish taxpayers.

Leisure facilities must be treated as essential infrastructure. Funding should be linked to growth.

Developer bonds would ensure infrastructure delivery. If not delivered, funds can be used by the Borough or parish to complete works. This strengthens IN2 and increases accountability.

Positive elements:

- Growth linked to funding mechanisms
- Recognises importance of leisure infrastructure
- Developer bonds offer delivery security

Negative elements:

- Current funding unreliable
- Costs shifted to parishes
- Leisure not linked to growth
- No bond mechanism
- Viability undermines delivery

10. Community Identity, Education, Service and Leisure Protection

Haydon Wick and Priory Vale are under sustained pressure on services. Schools such as Haydonleigh, Greenmeadow and Orchid Vale expanded rapidly after housing growth. This relied on temporary buildings and overstretched older facilities.

The plan does not safeguard land for future education. Secondary provision is limited. Growth at Kingsdown, Blunsdon and Tadpole will increase pressure.

Leisure facilities are central to community life. Sports halls, community centres and play areas support health and connection. Without growth linked standards, service gaps will widen.

Positive elements:

- Recognises service pressure
- Highlights education and leisure importance
- Opportunity to link provision to growth

Negative elements:

- Pressures ignored
- No safeguarded education land
- No leisure provision targets
- Catchment pressure will increase
- No alignment between growth and services

11. Employment, Skills and Digital Infrastructure

A strong Local Plan must support livelihoods, learning and connectivity. EC1 to EC3 and IN3 set objectives but do not deliver for North Swindon.

Employment allocations are concentrated in the south and east. None are in North Swindon. This forces commuting and worsens congestion on Thamesdown Drive and the A419. Orbital Shopping Park provides mainly retail jobs.

Skills and training are not integrated. North Star College provides excellent technical training in central Swindon but has no link to northern growth. Apprenticeship opportunities are limited.

Digital infrastructure policy is outdated. Priory Vale was built without fibre broadband. Tadpole Garden Village had inconsistent speeds. Taw Hill still has poor mobile coverage. FTTP must be installed at build stage.

There is no provision for incubators or co-working hubs. SMEs and professionals must operate elsewhere. This wastes opportunities for green tech and digital industries.

Positive elements:

- EC1 to EC3 set economic objectives
- IN3 recognises digital infrastructure
- Potential to link skills and growth

Negative elements:

- No employment land allocations in the north
- Commuter pressure on key routes
- Fibre broadband not required at build stage
- Skills policy underdeveloped
- No incubator or co-working provision
- Poor digital coverage in some areas
- Outdated evidence base

12. Open Space Policy Links (HL2–HL3)

Mouldon Hill, Seven Fields, Clifford's Meadow, Haydon Meadow, allotments and parish-managed play areas are central to community identity. These spaces should fall under HL2 and HL3 protection.

A presumption should be introduced against their loss or reallocation unless agreed with the parish and replaced with land of equal or greater value. Biodiversity net gain should be tied directly to these sites, ensuring growth strengthens rather than weakens the parish environment.

Positive elements:

- Clear alignment with HL2 and HL3
- Protects community and biodiversity assets
- Encourages local delivery of biodiversity gain

Negative elements:

- Current plan does not provide HL2–HL3 designation
- Smaller green spaces remain vulnerable
- No local enforcement mechanism

13. Monitoring and Accountability

Monitoring must be transparent. Borough wide indicators mask local problems. Parish level reporting would give residents clarity and ensure accountability.

Developer bonds tied to milestones would improve delivery. Without this, past failures will be repeated.

Positive elements:

- Monitoring framework exists

- Indicators create a baseline

Negative elements:

- Borough wide data hides local issues
- No parish level reporting
- No consequences for failure
- Weak accountability

14. Town Centre

The Local Plan's commitment to regeneration, heritage protection and improved transport is welcome.

Turnpike Junction remains outdated with no clear upgrade plan. Non central retail hubs such as Orbital Shopping Park are overlooked despite their importance to North Swindon.

The plan mentions additional railway stations but provides no delivery plan. Improved rail access could ease congestion.

Reopening of Oasis Leisure Centre would support regeneration and strengthen local leisure.

Positive elements:

- Commitment to regeneration
- Heritage protection included
- Transport connections identified
- Oasis reopening offers opportunity

Negative elements:

- No delivery clarity or funding
- Turnpike Junction ignored
- Retail hubs overlooked
- Rail opportunity missed
- No parish involvement

15. Partnership with Parish Councils

Parish councils maintain open spaces, allotments and facilities that shape local life. They understand local needs.

The draft plan does not reflect their role. There is no structured involvement in infrastructure, biodiversity monitoring or flood risk planning. This weakens accountability and wastes capacity.

Positive elements:

- Parish councils hold local knowledge
- Partnership would strengthen delivery

Negative elements:

- Parish role unrecognised
- No structured engagement
- No devolution of responsibilities

Top 10 Policy Asks

1. Infrastructure First: deliver transport, utilities and digital connectivity before homes are occupied
2. Extend Thamesdown Drive: commit funding to extend to Great Western Way
3. Upgrade Key Junctions: prioritise Cold Harbour and A419 access
4. Protect All Green Spaces: protect Mouldon Hill, Clifford's Meadow, Haydon Meadow and Seven Fields. Protect all parish open spaces and play areas. Protect Goodearl, Rose Walk and Ventnor Close allotments
5. Deliver Biodiversity Net Gain Locally: require delivery in or adjacent to affected parishes
6. Developer Bonds and Fair Funding: reintroduce bonds to secure delivery

7. Leisure as Core Infrastructure: link leisure to population growth and protect existing sites
8. Education and Community Services in Step with Growth: safeguard land and address capacity
9. Employment and Digital Connectivity in the North: allocate employment land and require FTTP at build stage
10. Formal Parish Role: embed parishes in infrastructure phasing, green space protection and monitoring

Closing Statement

This submission sets out clear expectations for infrastructure delivery, green space protection, biodiversity, climate resilience, economic balance and community identity.

Haydon Wick Parish Council is committed to working constructively with Swindon Borough Council to ensure the Local Plan delivers real benefits for existing and future residents.

This area has already experienced more than one wave of housing growth without the matching infrastructure. The next plan must get it right. The community deserves infrastructure, investment and protection that keeps pace with development.

Executive Summary

This submission sets out the position of Haydon Wick Parish Council on the Swindon Borough Council Local Plan 2023–2043. The parish welcomes the ambition to plan for Swindon's future but believes that current proposals fall short of ensuring fair, sustainable and balanced growth for North Swindon.

The parish comprises Haydon Wick ward and Priory Vale ward, which together have already experienced significant housing growth without matching investment in infrastructure. This has placed pressure on roads, health services, schools, green spaces and digital connectivity.

There is strong community support for protecting valued local assets including Mouldon Hill Country Park, Seven Fields Nature Reserve, Clifford's Meadow, Haydon Meadow, Goodearl allotments, Rose Walk allotments and Ventnor Close allotments. The Local Plan must give these spaces explicit protection and ensure biodiversity net gain is delivered locally, not traded away elsewhere.

Key infrastructure issues remain unresolved. These include the extension of Thamesdown Drive to Great Western Way, urgent upgrades to Cold Harbour Junction, improved A419 access for Tadpole and Burcot developments, and the installation of digital infrastructure before occupation of new homes. Failure to address these issues will deepen congestion, flood risk and inequality.

The parish calls for stronger policy on biodiversity, climate resilience, leisure provision, community services, employment and digital connectivity. Developer bonds should be

reintroduced to secure delivery, and parish councils should be embedded as formal partners in monitoring and implementation.

Top Policy Asks

1. Infrastructure first, with transport and utilities delivered before homes
2. Extension of Thamesdown Drive and upgrades to key junctions
3. Protection of all existing green spaces and allotments
4. Local delivery of biodiversity net gain
5. Developer bonds and fair funding for local services
6. Leisure and education provision linked to population growth
7. Investment in employment land and full-fibre broadband
8. Transparent, parish-level monitoring and accountability
9. Stronger climate resilience and flood alleviation commitments
10. Formal partnership with parish councils on delivery

North Swindon has already absorbed more than one wave of housing growth without sufficient infrastructure. The next Local Plan must ensure that investment, protection and delivery match the scale of development. A fair, sustainable and transparent plan is essential to build trust and protect the future of our community.



Respondent No: 288

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Q1. Title

Mr

Q2. First Name

David

Q3. Last Name

Parkinson

Q4. Job Title (where relevant)

Mathematics and Science Teacher

Q5. Organisation (where relevant)

Aspire Tuition

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

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

This section references the following documents – 1. 08.01_Landscape_sensitivity_assessment-2.pdf 2. 06.01_Green_infrastructure_strategy_2024_Part1.pdf 3. 03.04_Strategic_Housing_and_Economic_Land_Avai.pdf S0488 and S0488b – Highworth Old Golf Course We are pleased that Highworth's old golf course is not included within this Local Plan for housing development, and that the site is mentioned in the "01.02 Policies map Borough" as "Open Space". The bottom section – S0488 This section is designated as 'red' on the "Landscape Assessment Document" meaning it is a sensitive landscape site which holds recreational value. The top section - S0488b This section is not designated 'red' on the "Landscape Assessment Document", which under planning regulations, does not afford it the protection we seek. Only "Local Green Space", as sought by Highworth Town Council in their Draft Neighbourhood Plan 2, would provide that protection. This top section actually provides greater recreational value, due to its accessibility from the Town Centre (easy flat walking distance), along with how popular this part of the site is to Borough residents. S0488 and S0448b is special to Highworth and Borough residents, because – S0488b – Top northern section 1. The land includes a flat, well-drained top section that is easily accessible for those who are less mobile, and is also suitable for pushchairs and wheelchairs. 2. The land lies within easy walking distance of Highworth town centre. By contrast, site S0488 occupies the lower, more distant section, which may be less accessible for some people 3. Highworth Town Council, working with a group of local residents, has submitted a proposal to transform the entire site into a Nature Park. The plan includes a nature-themed café, making use of the former golf shop building, as well as a natural burial ground. This scheme demonstrates how the site could generate income for the Borough while delivering significant community and environmental benefits. 4. This is the only piece of publicly owned accessible land that can be used for a nature park within the Borough. 5. The panoramic views stretching across to the Marlborough and Wessex Downs are a unique feature of this publicly accessible land, with no other spot in Highworth offering a similar outlook. 6. Housing on this site would irreversibly damage the lovely views of the medieval town for people approaching Highworth. 7. Since SBC allowed the public golf course to close in 2019, the site has seen a huge increase in people using it for their daily exercise, mental health and wellbeing. It has been recorded that on average, around 500 people use the old golf course every day for their exercise. 8. A petition of local residents in 2022 received 4540 signatures, not to build on the old golf course. The campaign to save Highworth's old golf course also has a Facebook page of over 1600 members. 9. Highworth's setting as an ancient hilltop town would be destroyed if any housing were to be allowed on S0488b and S0488 10. The New Local Plan only shows one site for development off Lechlade Road (Reg 18 Site Allocation 18-030), which gives a skewed picture of the sizable developments that are planned, recently completed, or under consideration for Highworth. 11. The same site was withdrawn from the previous SBC Draft Local Plan in 2021, due to public pressure. A record number of resident responses were made to the local Plan at that time, for this site. For example, the 03.04 Strategic Housing and Economic Land Availability Assessment_annex 1 map.pdf shows the following developments likely or underway for Highworth – • S0482 David Wilson Homes - 237 houses • S0109 Land adjacent to Aldi – 90 houses and a care home • S0293 Land west of Lechlade road – 40 houses • S0042 Land west of Lechlade road – 53 houses • S0547 Land at Hampton Hill – 99 houses • S0467 Land east of Rounds Hill Mead – 250 houses *see note 1 below • S0518 Land at Twelve Oaks Golf Course – unknown *see note 2 below In addition to the above, the following is also not shown on the same document above, all of which are planned, under construction, under consideration or completed in recent years. • NEW Land at Shrivenham Road 43 (see note 3 below) • Backhouse Phase 1 Swindon Road (completed 2024) – 67 houses • Backhouse Phase 2 Swindon Road – (Currently under construction) – 43 houses • RagView – Shrivenham Road – Built by Persimmon Homes 2019 – 50 homes The scale of these developments is excessive for the small ancient hill top town of Highworth. This New Local Plan regulation 18 document is also misleading in terms of the number of new houses likely for Highworth, which should be corrected. Note 1 – An active planning application is open for the S0467 Round Hills Mead site (S/OUT/25/0664 - Outline application for the erection of up to 250 dwellings (including affordable homes), points of connection of access roads from A361)). Site S0467 is shown on the SHELTA 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: 289

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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

If the Council is to fulfil its legal obligations to meet the demand for the Borough's Self and Custom Build Register, it should include such sites (< 1 hectare) to also come forward as Rural Exception sites, in addition to the provisions of Policy HC7. Such sites would be likely to be more attractive to those seeking Self Build opportunities, rather than being part of a larger conventional housing scheme.

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

Amend Policy HC6 to include Self and Custom Build schemes to be considered as Rural Exception sites.



Respondent No: 290

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Gillian

Q3. Last Name Sherwood

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.

My biggest fear is the lack of infrastructure . We are already under immense pressure at our Dr's surgery, with many people having lengthy waits. There is no provision at all for NHS Density. The local schools are already at capacity, Mobile phone and broadband signals in the area are dire. All the roads in the area are already in a shocking state of disrepair and the building of more houses will inevitably mean more construction and services vehicles and roads being dug up again. Wroughton P.C put forward a plan in 2016 for ten years that seems to have been disregarded. Everyone understands that more housing is needed but local infrastructure needs to come first. Please heed what our parish council & residents are saying.

Q13. Please set out the changes you consider are needed. It will 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: 291

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Q1. Title

Mr

Q2. First Name

Kevin

Q3. Last Name

Smith

Q4. Job Title (where relevant)

not answered

Q5. Organisation (where relevant)

not answered

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[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. 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: 292

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title Mrs

Q2. First Name Charlotte

Q3. Last Name Murdoch

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) not answered

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[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". As a mental health practitioner working with children and young people, I am all too aware of the issues that young people and adults alike are now facing. Daily pressures are putting a severe risk on people's wellbeing, and we need ways to help manage our wellbeing. The number one way to support and look after our wellbeing, is to get outside into green open space and take some exercise. Whether that's alone, with others, with a loved pet, in walking groups, it is, it is by far the best way to take care of yourself both physically and mentally. I am a daily user of this space and I have raised my family to know and love the old golf course. It is such an asset to Highworth, and a place where we can take care of our wellbeing, which, as I have stated is of primary importance in a day and age where 1 in 5 young people are struggling with their mental health. We need, as adults, to ensure that we secure this beloved space as a resource that we know our families and future

generations can come and enjoy, look after their wellbeing and mental health, photograph wildlife (which is abundant!) walk dogs, meet with friends, have space to breathe away from pressures and strains. It's our duty to preserve the space, to lose it, in my professional opinion would be catastrophic for our community and surrounding areas, and once that has happened there is no going back. The bottom section – S0488 This section is designated as 'red' on the "Landscape Assessment Document" meaning it is a sensitive landscape site which holds recreational value. The top section - S0488b This section is not designated 'red' on the "Landscape Assessment Document", which under planning regulations, does not afford it the protection we seek. Only "Local Green Space", as sought by Highworth Town Council in their Draft Neighbourhood Plan 2, would provide that protection. This top section actually provides greater recreational value, due to its accessibility from the Town Centre (easy flat walking distance), along with how popular this part of the site is to Borough residents. S0488 and S0448b is special to Highworth and Borough residents, because – S0488b – Top northern section 1. The land includes a flat, well-drained top section that is easily accessible for those who are less mobile, and is also suitable for pushchairs and wheelchairs. 2. The land lies within easy walking distance of Highworth town centre. By contrast, site S0488 occupies the lower, more distant section, which may be less accessible for some people 3. Highworth Town Council, working with a group of local residents, has submitted a proposal to transform the entire site into a Nature Park. The plan includes a nature-themed café, making use of the former golf shop building, as well as a natural burial ground. This scheme demonstrates how the site could generate income for the Borough while delivering significant community and environmental benefits. 4. This is the only piece of publicly owned accessible land that can be used for a nature park within the Borough. 5. The panoramic views stretching across to the Marlborough and Wessex Downs are a unique feature of this publicly accessible land, with no other spot in Highworth offering a similar outlook. 6. Housing on this site would irreversibly damage the lovely views of the medieval town for people approaching Highworth. 7. Since SBC allowed the public golf course to close in 2019, the site has seen a huge increase in people using it for their daily exercise, mental health and wellbeing. It has been recorded that on average, around 500 people use the old golf course every day for their exercise. 8. A petition of local residents in 2022 received 4540 signatures, not to build on the old golf course. The campaign to save Highworth's old golf course also has a Facebook page of over 1600 members. 9. Highworth's setting as an ancient hilltop town would be destroyed if any housing were to be allowed on S0488b and S0488 10. The New Local Plan only shows one site for development off Lechlade Road (Reg 18 Site Allocation 18-030), which gives a skewed picture of the sizable developments that are planned, recently completed, or under consideration for Highworth. 11. The same site was withdrawn from the previous SBC Draft Local Plan in 2021, due to public pressure. A record number of resident responses were made to the local Plan at that time, for this site. For example, the 03.04 Strategic Housing and Economic Land Availability Assessment_annex 1 map.pdf shows the following developments likely or underway for Highworth – • S0482 David Wilson Homes - 237 houses • S0109 Land adjacent to Aldi – 90 houses and a care home • S0293 Land west of Lechlade road – 40 houses • S0042 Land west of Lechlade road – 53 houses • S0547 Land at Hampton Hill – 99 houses • S0467 Land east of Rounds Hill Mead – 250 houses *see note 1 below • S0518 Land at Twelve Oaks Golf Course – unknown *see note 2 below In addition to the above, the following is also not shown on the same document above, all of which are planned, under construction, under consideration or completed in recent years. • NEW Land at Shrivenham Road 43 (see note 3 below) • Backhouse Phase 1 Swindon Road (completed 2024) – 67 houses • Backhouse Phase 2 Swindon Road – (Currently under construction) – 43 houses • RagView – Shrivenham Road – Built by Persimmon Homes 2019 – 50 homes The scale of these developments is excessive for the small ancient hill top town of Highworth. This New Local Plan regulation 18 document is also misleading in terms of the number of new houses likely for Highworth, which should be corrected. Note 1 – An active planning application is open for the S0467 Round Hills Mead site (S/OUT/25/0664 - Outline application for the erection of up to 250 dwellings (including affordable homes), points of connection of access roads from A361)). Site S0467 is shown on the SHELTA 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: 293

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title

Mr

Q2. First Name

Andrew

Q3. Last Name

Black

Q4. Job Title (where relevant)

Managing Director

Q5. Organisation (where relevant)

Andrew Black Consulting on behalf of Balmoral Land (UK) Ltd

[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 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



Land East of Swindon Road, Wroughton

Swindon Local Plan 2023-2043

Regulation 18 Consultation

October 2025

Project	Land East of Swindon Road, Wroughton
---------	---

ABC Reference	ABC/0301/07
---------------	-------------

Local Authority	Swindon Borough Council
-----------------	-------------------------

Client	Balmoral Land (UK) Ltd and Mrs Birks
--------	--------------------------------------

Issue	Final
-------	-------

Author	Andrew Black
--------	--------------

Date	October 2025
------	--------------

Disclaimer: This report has been prepared for the above named client for the purpose agreed in Andrew Black Consulting's (ABC) terms of engagement. Whilst every effort has been made to ensure the accuracy and suitability of the information contained in this report, the results and recommendations presented should not be used as the basis of design, management or implementation of decisions unless the client has first discussed with ABC their suitability for these purposes and ABC has confirmed their suitability in writing to the client. ABC does not warrant, in any way whatsoever, the use of information contained in this report by parties other than the above named client.

Contents

1. Introduction.....	4
2. Site and Proposed Development	5
3. Housing Delivery and Requirement.....	11
4. Sustainability Appraisal	13
5. Policy SGL 05 – East Wroughton	16
6. Landscape and Areas of Non-Coalescence	17
7. Conclusions.....	21

Appendix 1 - Public Consultation Feedback Summary

Appendix 2 - Framework Masterplan

Appendix 3 - Letter from WH Landscape Consultants

Appendix 4 - UK Biodiversity Action Plan Priority Habitat Description - Lowland Fens



1. Introduction

- 1.1 These representations have been prepared by Andrew Black Consulting on behalf of Balmoral Land (UK) Ltd in relation to their ownership at Land East of Swindon Road in Wroughton. The site under the ownership of Balmoral Land (UK) Ltd [Balmoral] and Artis Farms Ltd in addition to land owned by Mrs Birks (only accessible through the Balmoral owned land) forms part of the wider allocation under policy SGL05 which sets out that East Wroughton is identified as a Strategic Growth Location and is expected to bring forward 1,031 homes over the Plan Period.
- 1.2 The land East of Swindon Road, Wroughton has been promoted through previous iterations of the local plan and is considered highly deliverable in the early part of the plan period.
- 1.3 These representations are made in the context of the tests of soundness as set out in paragraph 36 of the current National Planning Policy Framework (NPPF). This states that plans are 'sound' if they are:

Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

- 1.4 These representations set out details of the site and surrounding area; consideration of the sustainability appraisal; details of policy SGL05 for the land at East Wroughton; consideration of landscape impacts of the proposals including the proposed area of non-coalescence; and conclusion of these representations.
- 1.5 Overall, it is considered that the proposal to allocate part of the site for development is logical and sound. However, for the reasons set out, it is considered that the site has the potential to deliver more dwellings (including much needed affordable housing), in the early part of the plan period, than as set out in the allocation.

2. Site and Proposed Development

- 2.1 The Land East of Swindon Road in Wroughton comprises of approximately 25 hectares of farmland to the north east of Wroughton. The site has direct frontage onto Swindon Road and is bounded to the north by the M4, to the east and south by arable farm land and to the south and west by existing housing.



Figure 1 – Extent of Land East of Swindon Road (excluding land owned by Mrs Birks)

- 2.2 The site has been consistently promoted throughout previous stages of the local plan process. This has included engagement with local residents and the parish council. A summary of the outcome of the community engagement process is set out in appendix 1 of these representations.
- 2.3 A framework plan was developed which shows development of the site in context of the existing built up area of Wroughton. A substantial Eco Park would be provided around the perimeter of the park equating to 45% of the site area, providing a significant landscape buffer to the surrounding countryside.



Figure 2 – Initial Masterplan (excluding land owned by Mrs Birks)

- 2.4 Following, the publication of the local plan, and the feedback received at the consultation the buffer along the northern boundary of the site with the M4 was increased in order to address the concerns regarding coalescence.



Figure 3 – Revised Masterplan

- 2.5 The revised masterplan is included in appendix 2 of these representations.
- 2.6 Suitable and safe access to the site can be provided from Swindon Road in two separate locations with an upgrade to the existing Lister Road/Swindon Road roundabout to provide a fourth arm into the site.

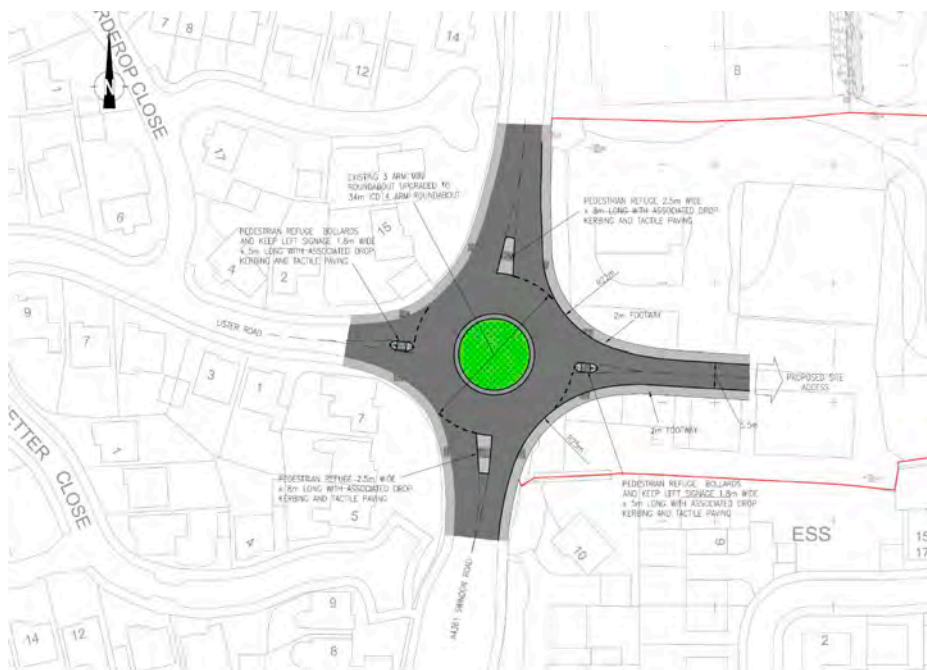


Figure 4 – Junction Improvements

- 2.7 An area of mixed use development is proposed at the front of the site which can accommodate commercial and community uses. It is considered that the site could accommodate up to 500 dwellings (including the land owned by Mrs Birks) at a density of between 40-45 homes per developable hectare.
- 2.8 The site is highly deliverable and can provide a mix of dwellings, including a policy compliant provision of affordable housing, in the early part of the plan period.
- 2.9 The southern part of the land under the ownership of Balmoral (18-020) site forms part of the allocation at Wroughton allocated within the wider policy SGL05 for 1,031 dwellings. The land to the north of the allocation, also within the control of Balmoral, is proposed as an area of non-coalescence. Further representations are made on this area of the site within these submissions, and it is considered that this land is developable for additional dwellings whilst retaining separation to the surrounding landscape.
- 2.10 The other parts at Berkeley Farm (18-021) and Akers Land (18-022) fall within the allocation but are outside of the control of Balmoral owned land.

Land East of Swindon Road, Wroughton Regulation 18 Consultation

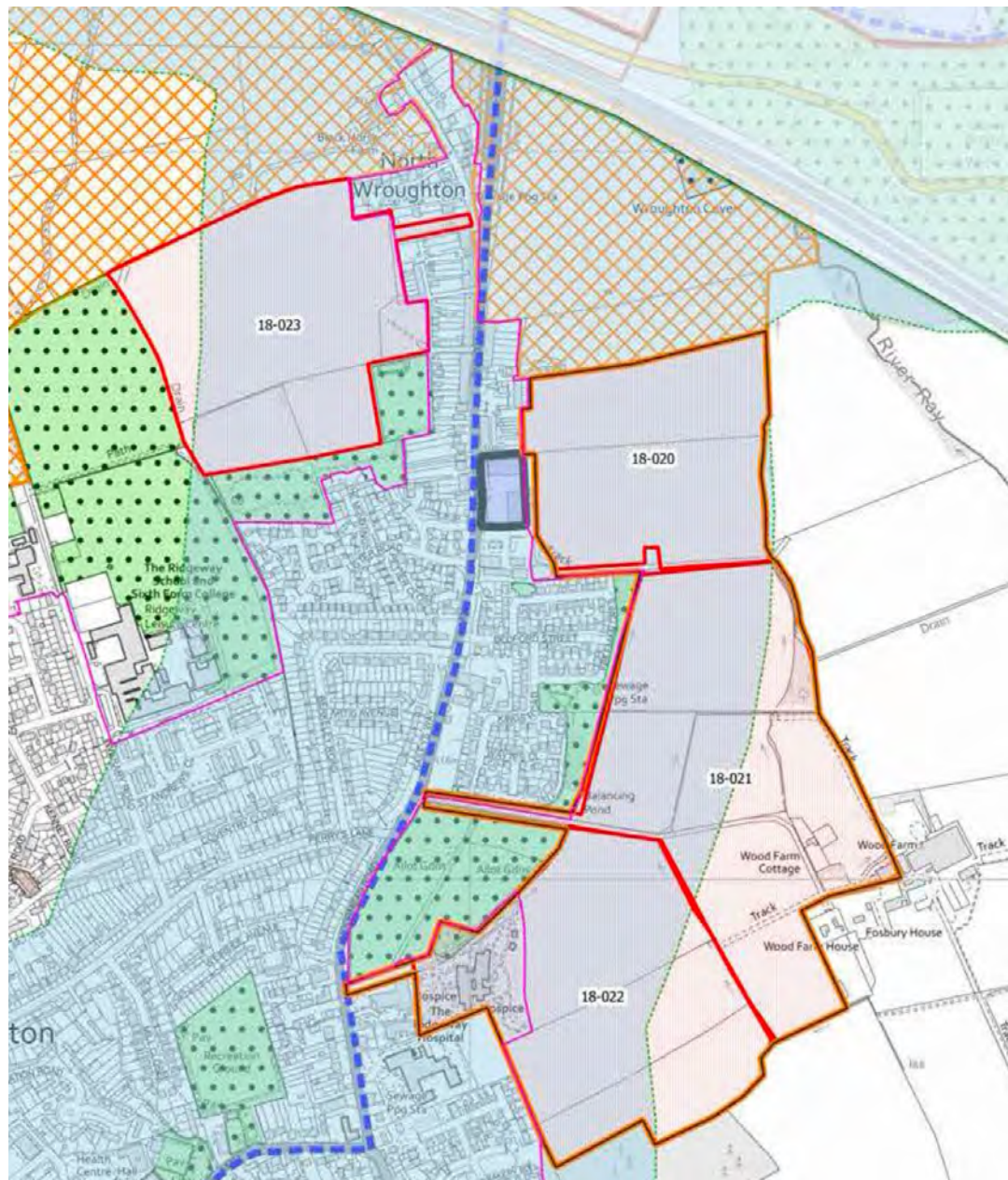


Figure 5 – Proposals Map Extract

- 2.11 The rationale for the allocation of the site is partially derived from the Strategic Housing and Economic Land Availability Assessment. The northern parcel is s0071, the central parcel is s0072b (land owned by Mrs Birks) and the southern parcel within the allocation is s0072.

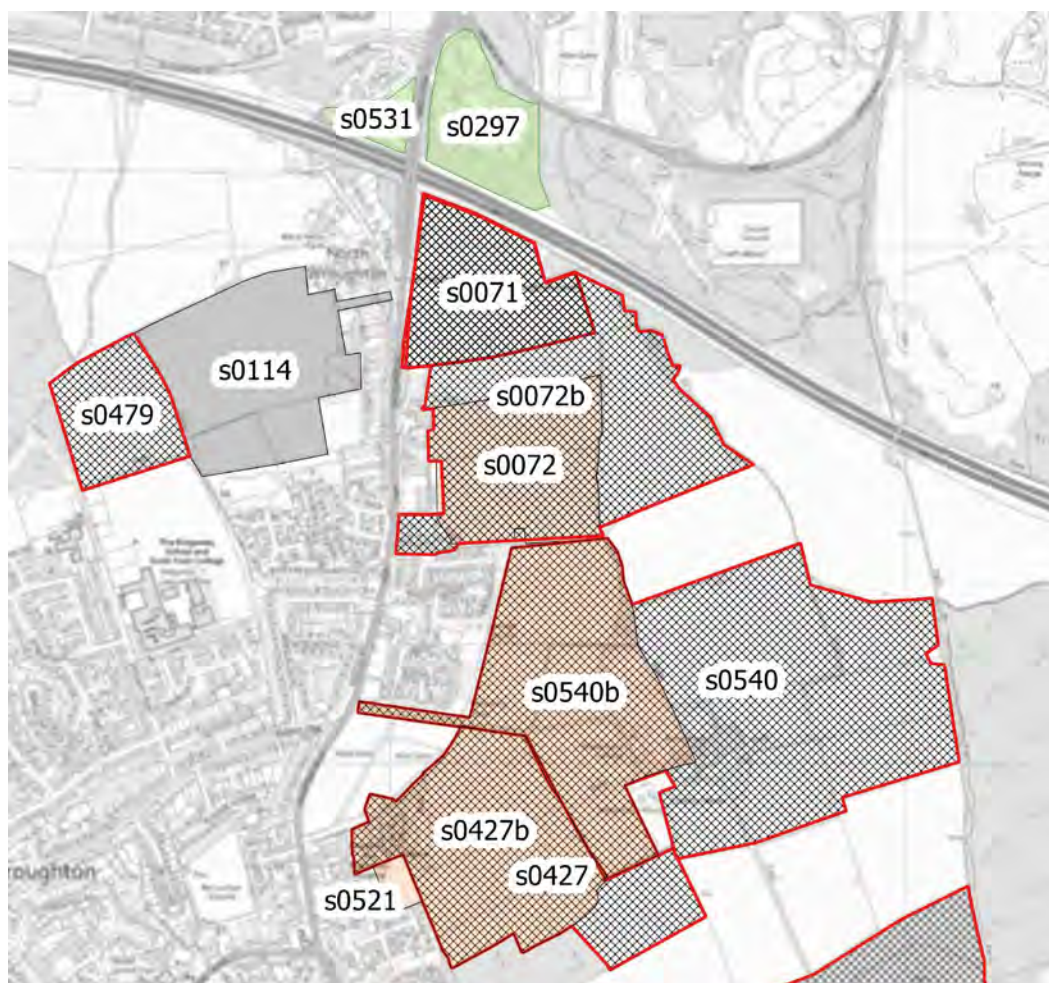


Figure 6 – SHLAA Extract

- 2.12 The HELAA sets out a RAG assessment of the site against key criteria of heritage, landscape, archaeology, ecology regeneration priorities and location.

	S0072	S0072b	S0071
Heritage	Green	Green	Green
Landscape	Yellow	Red	Red
Archaeology	Yellow	Yellow	Yellow
Ecology	Green	Yellow	Green
Regeneration Priorities	Yellow	Yellow	Yellow
Location	Yellow	Yellow	Yellow

- 2.13 For the reasons set out within later stages of these representations, it is not considered that parcels s0071 and s0072b (land owned by Mrs Birks) would have greater landscape harm than s0072. They are further away from the national landscape to the south, which is the main source of landscape sensitivity, and are contained to the north by the M4. The conclusions in the HELAA in this regard are therefore disputed. A letter from WH Landscape consultants included with these representations (appendix 3) which sets out further details on the landscape impact from the proposed development of the site.



Land East of Swindon Road, Wroughton

Regulation 18 Consultation

- 2.14 In terms of the other areas of the land under control the control of Balmoral, the conclusion on suitability in relation to S0072b states:

Site located outside of current settlement boundary. Extensive greenfield site extends up to M4 and includes farm buildings fronting onto Swindon Road. Residential partly to the south and west. Whilst walkable to Wroughton centre, some concern regarding access to a variety of facilities and services. Site located along key transport corridor. Site includes area identified as Lowland Fen irreplaceable habitat and significant concern related to landscape.

- 2.15 The rating in relation to landscape is also considered to be erroneous given that S0072b is further away from the national landscape than other parcels within the allocation for Land East of Swindon Road.

- 2.16 The concerns regarding access are not considered to weigh heavily against the site, particularly given the acknowledgement that the site is in a 'sustainable movement corridor'. The reference Lowland Fen is considered to be an error, the site is an existing area of paddock land and is extensively grazed by horses, it has none of attributes of this designation when compared with the UK Biodiversity Action Plan Priority Habitat Description for Lowland Fens (appendix 4).

- 2.17 The site has been subject to ecological survey multiple times since 2020, focusing on bats, GCN, habitats, dormice and badgers. The subsequent data has been assessed and used to inform the site layout to ensure that the ecological constraints onsite have been taken account of. The mitigation hierarchy has been followed with avoidance of key features taking precedence over compensation or mitigation. Bats have been highlighted as a key feature onsite and dark corridors have been provided within the scheme to ensure the continued use of the site for commuting and foraging bats onsite and within the wider landscape. The large enhancement zone at the east of the site will be sensitively designed to ensure a biodiversity net gain onsite with high value to a range of priority species.

- 2.18 The conclusion on suitability in relation to site s0071 which is the furthest north land parcel states:

Site located outside of current settlement boundary. Greenfield site adjacent to M4 motorway. Site provides a settlement gap and definition between Swindon and Wroughton. Significant concerns related to landscape and some concerns relating to archaeology.

- 2.19 The proposed layout retains a large buffer in this area which would ensure that a significant gap between the built up area of the site and the park and ride allocation would be retained. In response received to the public consultation, the buffer area to the north of the site was increased substantially and this is shown on the masterplan enclosed with these representations.



3. Housing Delivery and Requirement

- 3.1 At present the council can only demonstrate a five year housing land supply of 4.90 years as set out in the latest Five Year Housing Land Supply Statement for the period 1 April 2025 – 31 March 2030.
- 3.2 The New Standard Method for Housing as set out by the Government in December 2024 establishes the housing need of 1,205 new homes per year in Swindon which equates to a need of 24,100 homes over the plan period.
- 3.3 The new requirement of 1,205 represents a significant increase from the homes delivered in recent year, as confirmed in the latest housing delivery test results published in December 2024.

Year	Homes Required	Homes Delivered
2021	686	525
2022	1,000	1,099
2023	1,024	1,008
Total	2,710	2,632 (96%)

- 3.4 Taking into account completions and sites with planning, the requirement is for 10,502 new homes over the plan period. As set out in paragraph 6.6 of the supporting text in the plan, the council intends to meet this need by:
- i) *Rolling over strategic site parcels without planning permission from the 2026 Local Plan (totalling 3,498 homes)*
 - ii) *Allocating new sites, with a total indicative housing yield of around 8,344 new homes.*
- 3.5 This approach would provide a buffer in the plan of 1,000 homes or 4% of the total requirement.
- 3.6 Table 3 of the most recent Authority Monitoring Report sets out the housing delivered at the strategic allocations since the start of the plan period.

Table 3: Houses delivered at strategic allocations since the start of the plan period		
Policy	Strategic allocation	Completed dwellings 2012/13 – 2024/25
NC1	Wichelstowe	1,443
NC2	Commonhead/ Badbury Park	1,242
NC3	New Eastern Villages – south of A420	151
NC3	New Eastern Villages – Rowborough	0
NC3	New Eastern Villages – South Marston	0
NC4	Tadpole Farm	Completed
NC5	Kingsdown	0



Land East of Swindon Road, Wroughton

Regulation 18 Consultation

3.7 These targets are also set out in the policies for New Communities (NC1, NC2, NC3, NC4, NC5). The delivery targets are as follows:

- Wichelstowe – 4,064 dwellings; 12.5 hectares of employment land
- Commonhead/ Badbury Park – 890 dwellings; 15 hectares of employment land
- New Eastern Villages – 6,000 dwellings south of A420; 1,500 dwellings at Rowborough; 500 dwellings at South Marston; 40 hectares of employment land
- Tadpole Farm – 1,695 dwellings; 5 hectares of employment land
- Kingsdown – 1,650 dwellings

3.8 Given the non-delivery from the New Easter Villages (NC3) and Kingsdown (NC5) to date, it is considered that the rationale for additional delivery from other allocations such as Land East of Swindon Road is considered justified.

3.9 The Local Housing Needs Assessment (LHNS 2025) demonstrates that the need for different sizes of dwellings is split fairly evenly across all tenures as set out in figure 3 of the plan.

New housing required 2023 to 2043		1 bed	2 bed	3 bed	4 bed
Market housing*	16,749	3,419	4,504	4,007	4,819
	70.02%	20.41%	26.89%	23.92%	28.77%
Shared ownership (SO)	2,825	518	674	824	809
	11.81%	18.34%	23.86%	29.17%	28.64%
Affordable Rent (AR)/ Social Rent (SR)	4,346	1,109	997	1,204	1,036
	18.17%	25.52%	22.94%	27.70%	23.84%
Total	23,920	5,047	6,175	6,035	6,663
	100.00%	21.10%	25.82%	25.23%	27.86%

3.10 The Borough does not monitor mix of dwellings from new development; however, it is clear that a broad mix of dwellings is required across all dwelling types and tenures over the course of the plan period.

3.11 However, paragraph 6.11 of the spatial strategy emphasises a shift towards Town Centre living and it is anticipated that this could unlock a large amount of the 1 and 2 bedroom housing need, targeting young professionals and students who are more likely to require regular access to other neighbouring employment/university areas. Whilst this approach will lead to clear regeneration outcomes, it requires further justification in terms of the viability of this approach and consideration of the mix of dwellings that would be delivered against the clear need for a broad mix of housing as established in the evidence base.



4. Sustainability Appraisal

- 4.1 In relation to Wroughton the SA sets out the following in relation to The Rural Area and rationale for the allocation of the site.

5.4.49 *Beginning with **Wroughton**, the preferred approach is to allocate four closely linked sites at the northern extent of the village as a Strategic Growth Location for a total of **1,031 homes**, namely: Berkley (western side) (s0540b; 365 homes; 16 ha); Akers Land (western side) (s0427b; 300 homes; 13 ha); Land at North Wroughton (s0114; 175 homes; 11.7 ha); and Land east of Swindon Road (South) (s0072; 191 homes; 9 ha).*

5.4.50 *A key point to note is that the historic core of the village is at its southern extent, at the foot of the North Wessex Downs scarp slope, and then the village has expanded north towards Swindon. There had then been limited growth over a number of years, but recently a series of sites have been permitted at appeal with weight having been given to the Borough's lack of a five year housing land supply*

5.4.51 *The other key point is that land to the north of Wroughton is well-linked to Swindon via the A4361 and, as discussed, the current proposed approach is to focus growth along this corridor with a view to supporting infrastructure and bus service enhancements. Furthermore, the village benefits from a secondary school and sixth form.*

5.4.51 *Looking across the four sites, Land at North Wroughton is an allocation in the made Wroughton Neighbourhood Plan for 120 homes, but the proposal is now to support 175 homes. There is a historic landfill site covering the majority of this area, and the proposal through recent planning applications has been to deliver a cricket pitch here. The remaining three sites are then located to the east of the A4361 and have good potential to come together in a coordinated way in order to deliver a comprehensive scheme that delivers benefits to the village. However, precisely what can be achieved requires further investigation, including through the current consultation, and it will be important to ensure suitably comprehensive growth with a long term perspective, recognising that wider land parcels in this area are available (although there are important constraints to growth, namely the NL and Burderop Wood SSSI).*

- 4.2 Paragraph 5.4.62 of the SA sets out the approach for Wroughton as follows:

Wroughton – one reasonable sub-area growth scenario, namely the preferred scenario involving strategic growth to deliver 1,031 homes. There is a clear strategic case for growth, but more work is required in order to explore what can be achieved.

- 4.3 Section 5.5 of the SA sets out the Reasonable Growth Scenarios, and these are summarised in table 5.1 as follows (with constants greyed out):

Supply component	Scenario 1 Preferred	Scenario 2 + North Swindon	Scenario 3 + Highworth
Completions and commitments	13,598	13,598	13,598
Windfall	0	0	0
Swindon town centre	4,358	4,358	4,358
The wider urban area	2,112	2,112	2,112
North urban edge	513	1,013	513
Northeast urban edge	515	515	515
East urban edge	2,022	2,022	2,022
South urban edge	1,620	1,620	1,620
Wroughton	1,031	1,031	1,031
Highworth	53	53	650
Total homes (2023 - 2043)	25,822	26,322	26,419
Average homes per annum	1,291	1,316	1,321
% above LHN (24,100 or 1,205 pa)	7%	9%	10%

4.4 It is clear that the only variables amongst the growth scenarios are delivery from the North Urban Edge and Highworth.

4.5 The SA recognises the potential for more homes to come forward under the plan in section 6.11 with the following conclusions:

- *There is a case to be made for a higher supply buffer commensurate with the level of delivery risk across the proposed supply (notably the town centre and NEV) and learning lessons from the adopted Local Plan (i.e. the lack of a 5YHLS in the years since its adoption). However, it is important to say that: A) the current assumed supply does not include a windfall assumption; B) the hope is that the current consultation will lead to additional sites being submitted for potential allocation in the town centre and in the urban area along the identified transport corridors; and C) further work through an subsequent to the current consultation should serve to firm up delivery certainty.*
- *Furthermore, additional sites under Scenarios 2 and 3 might deliver relatively early in the plan period (e.g. noting current planning applications), which could potentially assist with ensuring that the Council can maintain a five year housing land supply over the crucially important early years of the plan period (ahead of a Local Plan review). In turn, the effect would be to minimise any risk of having to fall back on a stepped housing requirement (i.e. a situation whereby needs risk going unmet in early years).*



Land East of Swindon Road, Wroughton

Regulation 18 Consultation

- *There is a case to be made for a higher housing requirement, particularly on account of the risk of unmet need from Cotswold District, albeit this case is somewhat weak.*
 - *The sites that would be additionally allocated under Scenarios 2 and 3 would be well placed to deliver affordable housing (including social rented), family housing and potentially specialist housing. As part of this, it is important to note that Council-owned land can be well placed to deliver affordable housing and wider planning gain.*
- 4.6 The Planning Practice Guidance sets out that reasonable alternatives *need to be sufficiently distinct to highlight the different environmental implications of each so that meaningful comparisons can be made.* (Paragraph 038 Reference ID: 11-038-20190722).
- 4.7 It is not considered that the variance of only two forms of housing delivery across all reasonable alternatives is sufficiently distinct to enable meaningful comparisons to be made within the SA.
- 4.8 As set out within these representations, it is clear that there is potential for additional housing on the land within the ownership of Balmoral and Mrs Birks. It is considered that additional housing at Wroughton, and at other locations, should have been tested as Reasonable Alternatives under the Sustainable Appraisal.



5. Policy SGL 05 – East Wroughton

- 5.1 Policy SGL05 sets out that East Wroughton is identified as a Strategic Growth Location and is expected to bring forward 1,031 homes over the Plan Period. It states that the Council will require high-quality, comprehensive development that comes forward through a strategic masterplan.
- 5.2 As set out, the land under the control of Balmoral is partially within the area identified under policy SGL05, but the northern element is identified for an area of non-coalescence.
- 5.3 The policy goes on to set out a number of requirements for development in this area. These are set out below with commentary made against each requirement in turn:
- a) *Include pedestrian links through adjacent residential parcels as part of a joined up, masterplan approach;***
- 5.4 Pedestrian Links with the other parcels can be achieved within the masterplan for the site.
- b) *Come forward as a housing-led scheme, with the potential for supporting local facilities or services;***
- 5.5 As set out, the wider site under the control of Balmoral and Mrs Birks has the potential to deliver up to 500 dwellings. This is considerably more than the 190 dwellings indicated on the southern element of this parcel within the HELAA.
- 5.6 An area for commercial or community facilities is indicated within the masterplan on the entrance to the site on Swindon Road. It is considered that the viability and deliverability for community facilities would be significantly increased through the provision of additional dwellings within this parcel.
- c) *Be sensitive to views into countryside when determining layout; and***
- 5.7 A framework plan has been developed which shows development of the site in context of the existing built up area of Wroughton. A substantial Eco Park would be provided around the perimeter of the park equating to close to 50% of the site area (on the Lral owned Land), providing a significant landscape buffer to the surrounding countryside. The layout demonstrates that a significant amount of additional housing could be provided on the northern element of the allocation without harm to the surrounding countryside. Further consideration is set out on this element within this representation.
- d) *Contribute towards the bus transit corridor.***
- 5.8 The provision of additional dwellings from the allocation under SGL05 would mean that delivery of the bus transit corridor would be effective within the plan period leading to enhanced sustainability outcomes in the development of this site.

6. Landscape and Areas of Non-Coalescence

- 6.1 The Landscape Sensitivity Assessment for Proposed Housing and Employment Sites forms part of the evidence base for the Regulation 18 consultation.
- 6.2 The study ranks the levels of overall sensitivity against key landscape indicators of susceptibility. Table 3.5 of the study sets out the definitions for the levels of sensitivity in line with the guidance from Natural England as follows:

High	Landscape and/or visual characteristics of the assessment unit are very susceptible to change and/or its values are high or high/medium and it is unable to accommodate the relevant type of development without significant character change or adverse effects. Thresholds for significant change are very low.
High/Medium	Landscape and/or visual characteristics of the assessment unit are susceptible to change and/or its values are medium through to high. It may be able to accommodate the relevant type of development but only in limited situations without significant character change or adverse effects if defined in the relevant land parcel summary. Thresholds for significant change are low.
Medium	Landscape and/or visual characteristics of the assessment unit are susceptible to change and/or its values are medium/low through to high/medium and/or it may have some potential to accommodate the relevant type of development in some defined situations without significant character change or adverse effects. Thresholds for significant change are intermediate.
Medium/Low	Landscape and/or visual characteristics of the assessment unit are resilient and of low susceptibility to change and/or its values are medium/low or low and it can accommodate the relevant type of development in many situations without significant character change or adverse effects. Thresholds for significant change are high.
Low	Landscape and/or visual characteristics of the assessment unit are robust or degraded and are not susceptible to change and/or its values are low and it can accommodate the relevant type of development without significant character change or adverse effects. Thresholds for significant change are very high.

- 6.3 The key landscape sensitivity for any development on the east side of Wroughton is proximity to the North Wessex Downs National Landscape. This is illustrated within the diagram in the study where the Land East of Wroughton (s0072) can be seen with Berkeley Farm (s5404b) to the south and Akers Land (s0427b) further south from this with the North Wessex Downs in purple.

Land East of Swindon Road, Wroughton

Regulation 18 Consultation

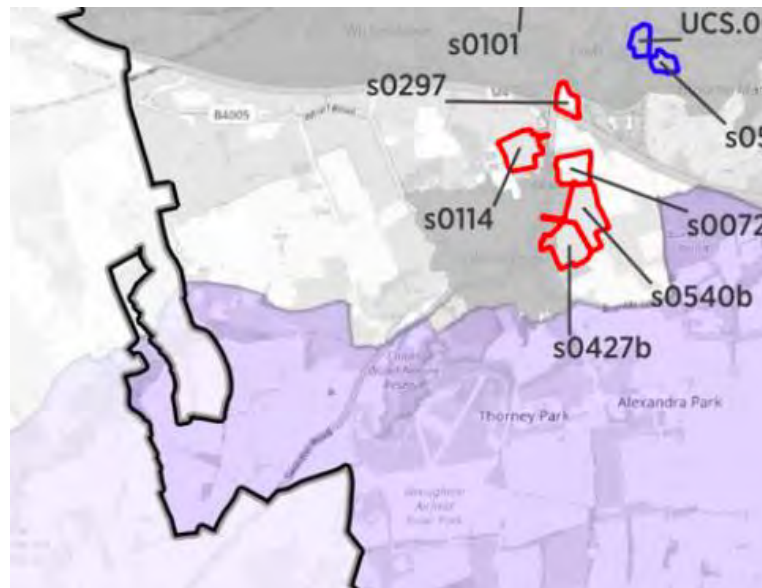


Figure 7 – Extract from Landscape Sensitivity Study.

6.4 The scoring for the Land East of Swindon Road is all at Medium, Medium Low or Low as follows:

		H	M	M/L	L
Landscape susceptibility					
Scale and enclosure	The site comprises two arable fields, divided by a hedgerow running east-west across the centre. Hedgerows border the southern and eastern boundaries. The northern boundary is lined with trees. Commercial and residential development meet the western boundary and part of the southern boundary.				L
Landform	Flat topography and uniform landscape.				L
Landcover (including biodiversity)	The site comprises arable fields bounded and divided by hedgerows and trees. A singular Oak tree is located in the centre of the southernmost field, whilst a small watercourse runs adjacent to the eastern site boundary.			M/L	
Man-made influences	Utility poles and overhead cables cross through the site. Commercial and residential development at Wroughton is adjacent to the western boundary and part of the southern site boundary. The M4 motorway is 200m to the north.		M		
Scenic quality and character	The site is situated on the urban-rural periphery. The M4 motorway to the north of the site serves as an auditory detractor. Noise from vehicular traffic is also present from the A4361. Development adjacent to the site is predominately residential, although there is potential for auditory disturbance from commercial establishments to the east of the site.			M/L	
Remoteness and tranquillity	Remoteness levels are limited. Levels of tranquillity are diminished by surrounding built form and vehicular noise from the surrounding road infrastructure, notably the M4 motorway.			M/L	
Visual susceptibility					
Skylines and settings	When viewed from Freeman Crescent, the skyline across the site is defined by trees to the north and east with development to the west and south.			M/L	
Movement	Views of moving traffic along nearby roads are substantially obscured by intervening vegetation and built form.		M		
Visibility, key views, vistas and typical receptors (both within and outside of each site)	Visual receptors include roads and local residents. Views into the site are filtered by hedgerows and occasional trees which vary in density along the boundaries.			M/L	

Land East of Swindon Road, Wroughton

Regulation 18 Consultation

6.5 In terms of views from the North Wessex Downs this is scored at High/Medium.

Views to and from important landscape and cultural heritage features (both within and outside of each site)	This site is visible from Brimble Hill, at the edge of the North Wessex Downs National Landscape at a distance of approximately 1.2km.	H/M
Value		
Landscape value	The site mostly comprises arable land. Hedgerow networks delineating the site provide ecological connectivity, including to Burderop Wood SSSI which is located 600m to the east of the site. The River Ray runs adjacent to the eastern boundary. The site is not accessible to the public.	M/L
Visual value	Views of development at this site from the surrounding PRoW network are likely to be substantially obscured by intervening vegetation and built form. This site is visible from Brimble Hill, at the edge of the North Wessex Downs National Landscape.	M

6.6 The study sets out the following regarding mitigation potential.

Retaining existing trees and planting new trees along the site boundaries can help to soften the visual impact of new buildings. New development is likely to be more suitable in the western half of the site, adjacent to existing built form within Wroughton. This will help to contain the pattern of existing development to the south

6.7 The overall landscape sensitivity of the site is classed as medium with the following conclusions:

The site is located at North Wroughton and comprises two arable fields, defined by boundary trees and hedgerows. The site is surrounded by existing commercial development to the west and south. The landscape to the north and east is rural in character. Tranquillity levels are reduced by the nearby presence of built form, the M4 motorway to the north and the A4361 to the east. This site is visible from Brimble Hill, at the edge of the North Wessex Downs National Landscape.

6.8 By contrast the land parcels also within the allocation to the south at Akers Land (Site s0427b) and Berkeley Farm (Site 0540b) are classed as High/Medium overall due to their relatively closer proximity to the North Wessex Downs National Landscape.

6.9 Policy CSE7 sets out the following in relation to areas of non-coalescence:

Areas of non-Coalescence, as defined in the Policies Map, will be maintained to retain a rural and open character of the land, and protect the separate identity of settlements (both existing and allocated).

6.10 The Area of non-Coalescence also covers the land to the north of the M4 up to the area of the former 'park and ride' site which is also allocated for development in the plan. The 'park and ride' site is well screened from the surrounding area and is not visible from the surrounding roads. Together with the M4 and the large area of buffer proposed on the northern part of



Land East of Swindon Road, Wroughton

Regulation 18 Consultation

the Land East of Swindon Road; it is not considered that any coalescence would take place if both sites were developed.

6.11 Policy CSE7 states that small scale proposals for development in this area will only be permitted where they retain and enhance the countryside character and achieve the following criteria (cumulatively or individually):

- a) *Avoid any loss of landscape quality, and retain the openness and character of the land around its existing settlements and the land allocations; and*
- b) *Protect the setting and separate identity of its settlements (both existing and allocated) by avoiding their coalescence, by physical separation and a sense of separation; and*
- c) *Involve the re-use, conversion or extensions of existing buildings, or*
- d) *Are an essential requirement directly related to the economic or social needs of the rural community*

6.12 Clearly the proposal for the allocation and Land East of Swindon Road would not fall under the definition of 'small scale proposals' and therefore further consideration is needed on the exact land parcels that will be defined as areas of non-coalescence.

6.13 Paragraph 9.21 of the supporting text states:

Swindon Borough has a number of settlements (as set out in Policy SS2). These settlements maintain distinct identities and this character should not be 'lost' as a result of new, large scale development. Significant new strategic site development at New Eastern Villages and Wichelstowe in particular must have regard to neighbouring settlements, preserving their separate identity. Noting the scale of these developments, Areas of Non-Coalescence have been identified (as shown on the Policies Map) which resist development, maintaining a 'buffer area' between newer and older settlements and preserving natural landscape.

6.14 Whilst the principle of areas of non-coalescence are supported it is not considered that an area to the extent of that shown on the proposals map would be effective or justified in the plan.

6.15 The proposed layout submitted with the representations clearly shows that an area of significant landscaping can be provided along the northern area of the layout in the form of an eco-park. This would have the purpose of maintaining the buffer area between Wroughton and Swindon to the north whilst also maximising the development potential of the site for additional dwellings within the plan period.



7. Conclusions

- 7.1 These representations demonstrate that the allocation for development at Land East of Swindon Road is highly logical and deliverable within the plan period. For the reasons set out, it is considered that the land at the north of the allocation, under the control of Balmoral and land owned by Mrs Birks, can accommodate significantly more dwellings than indicated within the HELAA.
- 7.2 The developable area is concentrated in the area of land on the west part of the site. The proposed eco park would wrap around the entire eastern and northern section of the site. In doing so, the development the site would not be harmful in landscape terms and the and would prevent coalescence with existing and proposed built form to the north, which in any event is separated by the M4. The inclusion of the other parcels of land, as set out within the representations, enables the delivery of additional dwellings from this allocation with significant ecological, biodiversity benefits and tree planting, which would benefit the wider community in Wroughton.
- 7.3 The masterplan attached with these representations demonstrates that the land under the control of Balmoral and Mrs Birks could accommodate up to 500 dwellings. This would enable delivery of much needed family housing (including affordable housing) in the early part of the plan period.
- 7.4 Overall, the general approach to the plan and evidence base is considered sound but the allocation for the Land East of Swindon Road for additional dwellings would represent an effective, justified and positively prepared plan.



Land East of Swindon Road, Wroughton

Appendix 1 – Public Consultation Feedback Summary

October 2025

Feedback Summary

We sent consultation invitation letters to **2,141 addresses** within the vicinity of the site. We received **147 responses** to our consultation – the majority of which were through our online feedback form or via email. 10 individuals used our Freepost service (though 2 of these had submitted feedback through the website as well – each respondent was only counted once).

This gives a response rate of just **6.9%**. Given that some of these responses may have come from individuals within the same household, or from those outside the area of invitation (who may have seen the consultation on social media or local news), this is likely an upper bound.

This suggests that **the overwhelming majority of local residents were not sufficiently interested in the proposals to respond.**

Of the responses, **111** could be considered opposed in principle, and **36** were either supportive or expressed no clear overall opinion on the plans. **24.5%** of the responses were therefore not opposed to the proposals

The main areas of interest raised by respondents to the feedback form were:

1. Health services in the area (**116 responses, 78.9% of total**)
2. Educational capacity in the area (**46 responses, 31.3%**)
3. A lack of perceived need for new homes in Wroughton (**43 responses, 29.3%**)
4. Increased traffic (**43 responses, 29.3%**)
5. Preference for 2 and 3 bed properties (**20 responses each, 13.6%**)
6. Few respondents with suggestions on Eco-Park (**14 responses, 9.5%**)

The feedback was broken down into 5 main questions, plus a space for other comments:

1. What size of new homes are most needed in this area (i.e. how many bedrooms)?

31 respondents expressed an opinion on this matter, with some responses suggesting multiple sizes.

Number of beds	1-bed	2-bed	3-bed	4-bed	5+ bed
Number of responses	6	20	20	6	2

This shows a clear preference for **2 and 3-bed** properties, with **13.6%** of respondents identifying the need for each. This equates to 64.5% of respondents who expressed an opinion on this topic.

2. Does the area have a need for a specific type of new homes (i.e. starter homes for young families, older persons' housing etc)? If so, what type?

32 respondents expressed an opinion on this matter, with some responses suggesting multiple types.

Starter Homes: 22 responses

Older persons homes: 12 responses

Misc. Affordable: 7 responses

Additionally, 4 respondents highlighted that there was already ample provision of old persons housing in the area.

This suggests a clear preference for starter homes, with **15.0%** of respondents identifying them as needed. This equates to 68.8% of respondents who left an opinion on this topic.

3. What community facilities are most needed in this area?

123 respondents made comments regarding community facilities needed in the area. Of these, the most common facilities suggested were:

- General healthcare (*GP, hospital, community health centre*): **116 responses**

- Schools: **46 responses**
- Dentist: **31 responses**
- Pharmacy: **30 responses**
- Local Shop/Convenience Store: **16 responses**
- Larger supermarket: **7 responses**
- Pub: **4 responses**
- Petrol Station: **3 responses**
- Café: **3 responses**

GP/ Doctor's provision was by far the most significant concern for residents (**94.3%** of respondents to this question, **78.9%** of total respondents), with many blaming the influx of additional patients from Wichelstowe and other recent developments.

4. Do you have any comments on the proposed highways improvements, including the two new access points on to Swindon Road?

50 responses made reference to Traffic and Access, but very few mentioned the highway improvements specifically. **5** responses were a positive towards the access arrangements, though **4** also wanted further traffic calming measures. **4** respondents also inquired as to the possibility of a bypass road/access from the M4.

More broadly:

43 respondents mentioned an increase in traffic along Swindon Road/ in the village due to the additional houses

13 specifically mentioned issues with the current M4 flyover

9 suggested improvements were needed to the bus service in the area

8 suggested that road condition in the area was generally poor

This suggests general content with the proposed highways improvements, but some concern regarding the increased traffic in the area.

5. What features would you like to see in the proposed eco-park?

Just **14** respondents expressed an opinion on what they would like to see in the eco-park, though many gave multiple suggestions. Of these:

11 suggested they would like to see trees in the park

8 suggested a water feature/pond

8 suggested areas for children's play (2 respondents suggested there were already plenty of these in the area)

8 suggested areas for wildlife

7 emphasised a need for accessible paths (flat, even, wheelchair-accessible)

6 suggested dog-walking facilities (i.e. dog poo bins)

4 suggested cycle paths

4 suggested spaces for seating

2 suggested parking spaces

6. Other comments

Of the other comments made by residents, the following were the most common:

43 respondents said that there was no need for new homes in Wroughton (some acknowledged the need nationally or in the Swindon area, but suggested Wroughton had supplied its need)

30 respondents were concerned the proposals would affect Wroughton's perceived village character, predominantly by turning it into a "town" or a "suburb of Swindon".

26 respondents were concerned that the proposals were on green field land (many suggested that there were more suitable brownfield sites within Swindon, such as the park and ride on the other side of the M4)

17 respondents raised concerns regarding the mains water and sewage systems, claiming these were out of date and/or overburdened

10 responses raised concerns about flooding and drainage

9 responses suggested a need for adequate parking in the new development, as many people struggled to park along Swindon Road already.

Jamie O'Sullivan

16.09.25



Land East of Swindon Road, Wroughton

Appendix 2 – Framework Masterplan

October 2025



- Site Boundary
- Attenuation Features
- Equipped Play Areas
- Public Open Space
- Vegetated Bund
- Hedgerows
- Existing Trees
- Proposed Trees
- Residential Development
- Potential Mixed Use Development
- Proposed Eco Park

NOTES:

SCALE: Do not scale from this drawing.

SETTING OUT: All setting out, levels, dimensions to be agreed on site. Do not use the information on the drawing without checking all dimensions on site. Any discrepancies between drawings, specifications and site works are to be reported to The Urbanists. Order of construction and setting out is to be agreed on site.

CHECK: This drawing must be the latest revision, read in conjunction with all other drawings, details, specifications and schedules. All dimensions are in millimetres unless otherwise stated. Where any contradiction or uncertainty arises between the drawings and/or the schedule of works / specification, it is the Contractor's responsibility to seek verification from The Urbanists before proceeding. No claim will be met by The Urbanists, where the Contractor continues work in absence of such confirmation.

No.	Date	By	Revision Notes
DRAFT			

PROJECT STATUS: SO (WORK IN PROGRESS)

theurbanists

Client Balmoral Land

Project Wroughton

Title Framework Masterplan

Project ID 2501

Organiser URB

Volume XX

Level XX

Type DR

Dwg 101

Suit SO

Rev -

Drawn AC Date 10/3/25 Checked JB Scale 1:1000

© This drawing is copyright and may not be reproduced in whole or part without written authority.



Land East of Swindon Road, Wroughton

Appendix 3 – Letter from WH Landscape Consultants

October 2025

On behalf of:



SGL 06 East Wroughton – Reg 18 Comments on Non-Coalescence Area Proposals

1. The land to the east of the A4361 and south of the M4 in Wroughton is proposed to form one of Swindon Borough Council's Strategic Growth Allocations. Key to development of the site, and other sites south of the M4 Motorway, is ensuring the non-coalescence of Swindon and Wroughton. To the west of the A4361 south/north transport corridor this largely comprises a large designated non-coalescence area on the lowland to the south of the M4. To the east of the A4361, separation is provided by extensive woodland cover south of the B4006, the Broome Manor Golf Course and Coate Water, which are designated as a GI Corridor, Open Space and Country Park. There is a single SLAA site with this area, close to the A4361, on the Park-and-Ride site owned by Swindon Borough Council (SLAA site 18-027).

2. The potential allocation of site 18-027 for residential development, albeit in an area surrounded by dense tree cover and woodland, is somewhat incongruous as it proposes development in a non-residential area which has historically been considered to be part of Swindon's 'Front Garden'. Development of 18-027 will reduce the gap between the residential edge of Swindon to the southern edge of the M4 corridor, where it abuts the site that is being promoted, to as little as 100 metres. The response by Swindon Borough Council has been to propose that the entire northern field and the adjacent small pasture field (to the south) of the site that is being promoted are included within a new non-coalescence area. The inclusion of these two fields will provide a non-coalescence area of up to 400m in depth north/south on the flat ground to the south of the M4.

3. However, it is considered that the non-coalescence area proposed is excessive for the following reasons:

- The area proposed extends south of the existing A4361 roadside development of Wroughton and therefore in part does not perform a true non-coalescence function.
- The proposed area does not follow a logical functional line, but follows existing field boundaries, which



is not necessarily the most rational development boundary.

- The proposed non-coalescence area should be a multifunctional landscape buffer, providing, not only a gap between Swindon and Wroughton, but strategic mitigation for development, noise attenuation, open green space/green infrastructure, surface water attenuation, etc.
- The inclusion of SLAA site 18-027 north of the M4 appears to be the primary reason for requiring the extension to the south of the M4, although the appropriateness of site 18-027 for development is questioned.

4. The development site being promoted is well contained by existing development, hedgerows and hedgerow trees, and has a fairly flat landform. While this land did not form part of the recent Landscape Sensitivity Assessment (LSA) for Proposed Housing and Employment Sites (August 2025) within the Swindon borough, the lands immediately to the south was (Site s0072). It was found that the Overall Landscape Sensitivity of Site s0072 was Medium, being *“considered to be susceptible to change but may have some limited potential to accommodate sensitively designed development.”* Had the land to the north also been included within the LSA, it is considered that a similar conclusion would have been drawn.

5. It is accepted that an off-set from the M4 is required for noise attenuation and screening purposes, which may involve bunding and noise attenuation fencing, as well as a substantial amount of woodland planting, to provide a suitable visual and physical buffer between Swindon and the proposed development area. It is considered appropriate that there should be a multi-functional non-coalescence area extending along the northern part of the site and should be vary in depth from approximately 100m at the western (A4361) boundary and reducing to the east. However, this is considerably reduced from that proposed by Swindon BC yet is considered to perform the same function at the same time as maximising the development potential of the site.

Yours sincerely,

Will Harley BSc (Hons) CMLI
(Director)



Land East of Swindon Road, Wroughton

Appendix 4 – UK Biodiversity Action Plan Priority Habitat Description – Lowland Fens

October 2025



UK Biodiversity Action Plan Priority Habitat Descriptions

Lowland Fens

From:

UK Biodiversity Action Plan; Priority Habitat Descriptions. BRIG (ed. Ant Maddock) 2008.

This document is available from:

<http://jncc.defra.gov.uk/page-5706>

For more information about the UK Biodiversity Action Plan (UK BAP) visit

<http://www.jncc.defra.gov.uk/page-5155>

Please note: this document was uploaded in November 2016, and replaces an earlier version, in order to correct a broken web-link. No other changes have been made. The earlier version can be viewed and downloaded from The National Archives:

<http://webarchive.nationalarchives.gov.uk/20150302161254/http://jncc.defra.gov.uk/page-5706>

Lowland Fens

Formerly named 'fens', details of this habitat can be found in the pre-existing Habitat Action Plan (<https://webarchive.nationalarchives.gov.uk/20110303150139/http://www.ukbap.org.uk/UKPlans.aspx?ID=18>), a summary of which appears below.

The UK is thought to host a large proportion of the fen surviving in the EU. As in other parts of Europe fen vegetation has declined dramatically in the past century.

Fens are peatlands which receive water and nutrients from the soil, rock and ground water as well as from rainfall: they are minerotrophic. Two types of fen can broadly be distinguished: topogenous and soligenous. Topogenous fens are those where water movements in the peat or soil are generally vertical. They include basin fens and floodplain fen. Soligenous fens, where water movements are predominantly lateral, include mires associated with springs, rills and flushes in the uplands, valley mires, springs and flushes in the lowlands, trackways and ladder fens in blanket bogs and laggs of raised bogs.

Fens can also be described as 'poor-fens' or 'rich-fens'. Poor-fens, where the water is derived from base-poor rock such as sandstones and granites occur mainly in the uplands, or are associated with lowland heaths. They are characterised by short vegetation with a high proportion of bog mosses *Sphagnum* spp. and acid water (pH of 5 or less). Rich-fens, are fed by mineral-enriched calcareous waters (pH 5 or more) and are mainly confined to the lowlands and where there are localised occurrences of base-rich rocks such as limestone in the uplands. Fen habitats support a diversity of plant and animal communities. Some can contain up to 550 species of higher plants, a third of our native plant species; up to and occasionally more than half the UK's species of dragonflies, several thousand other insect species, as well as being an important habitat for a range of aquatic beetles.

In intensively farmed lowland areas fens occur less frequently, are smaller in size and more isolated than in other parts of the UK. There are, however, exceptions to this. The UK's largest continuous area of base-poor fen, the Insh Marshes in the floodplain of the River Spey in Scotland, covers an area of 300ha, the calcareous rich fen and swamp of Broadland covers an area of 3,000ha and Lough Erne system in Fermanagh has extensive areas of fen and swamp. In some lowland areas such as the Scottish borders and southern Northern Ireland there are concentrations of small fens of particular importance.



Respondent No: 294

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

- Q1. Title

Mr
- Q2. First Name

Jacob
- Q3. Last Name

Parkinson
- Q4. Job Title (where relevant)

Swimming Pool Life Saver
- Q5. Organisation (where relevant)

Aspire Tuiton

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

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

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_Availability_Assessment.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 SHELTA 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: 295

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title

Ms

Q2. First Name

Claire

Q3. Last Name

Hawkes

Q4. Job Title (where relevant)

Associate Director

Q5. Organisation (where relevant)

Turley on behalf of Gleeson Land

[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 see attached response.

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

not answered

Representations to Regulation 18 Consultation – Swindon Local Plan 2043

On Behalf of Gleeson Land

October 2025

Turley

Contents

1.	Introduction	3
2.	Chapter 4 - Spatial Strategy and Strategic Area Policies	6
3.	Chapter 5 - Sustainable, High Quality Development	9
4.	Chapter 6 - Places for People	11
5.	Chapter 9 - An Environmentally Friendly Swindon	20
6.	Chapter 10 – A Healthy, Socially Connected Swindon	24
Appendix 1: Vision Document, Twelve Oaks; a new Sustainable Neighbourhood for Highworth, October 2025		26
Appendix 2: Location Plan, ref edp9026_d009		27
Appendix 3: Technical Review of Housing Needs in Swindon, October 2025		28

Contact

Claire Hawkes



October 2025

1. Introduction

Introduction

- 1.1 This report has been prepared by Turley on behalf of Gleeson Land ('Gleeson') in order to respond to the current consultation in Swindon Borough on the Regulation 18 Consultation Local Plan Document. The responses in this report comment on various aspects of the draft plan as well as in relation to land Gleeson has interests in at the former Twelve Oaks Golf Course to the north of Highworth.
- 1.2 The Council are in the process of preparing a new Local Plan for the Borough; the Swindon Local Plan 2043. This seeks to set out housing and employment needs and allocations, policies and strategies, and detail how the Council will meet national and local objectives to achieve economic growth across the Borough. Currently the Council have invited comments as part of a Regulation 18 consultation, and responses are invited until 13 October 2025.
- 1.3 To support the comments provided by Gleeson in this report, the following documents have been prepared and are attached as appendices;
- 1) Vision Document, Twelve Oaks; a new Sustainable Neighbourhood for Highworth, October 2025;
 - 2) Location Plan, ref edp9026_d009; and
 - 3) Technical Review of Housing Needs in Swindon, October 2025.
- 1.4 In order to assist with the collation of responses to this consultation this report is structured into headings which relate to the chapters and policies within the consultation draft document. Our comments relate to the following parts of the draft Plan;
- Chapter 4 - Spatial Strategy and Strategic Area Policies
 - The Plan Period
 - Policy SS1 Swindon's Spatial Approach to Growth
 - Policy SS2 Settlement Hierarchy
 - Chapter 5 – Sustainable, High Quality Development;
 - Strategic Policy SP1: Sustainable Development
 - Chapter 6 – Places for People
 - Policy SP2 – Homes for the Community
 - Town Centre Sites and Policy SGL 01 – Swindon's Central Area

- Growth at Highworth and Scenarios considered in the Interim Sustainability Appraisal
- Chapter 9 – An Environmentally Friendly Swindon
 - Policy SP6 – Climate Stability and the Environment
 - CS1: Carbon Reduction and Sustainable Design in new development
 - CSE2: Whole Life Carbon Assessments (WLCA)
- Chapter 10 – A Healthy, Socially Connected Swindon;
 - U1: Wastewater, Sewage Infrastructure and Water Supply
 - U3: Energy Networks

1.5 The detailed response to the consultation is set out within this report and associated appended documents and we request that these comments are considered in full by the Council ahead of the next stage of the plan. To assist a high level overview of the key points is set out in the bullet points below;

- Swindon should treat the LHN as a minimum, as required by national policy;
- reliance on commitments and windfall delivery should be treated with caution and an appropriate lapse rate applied to this source of supply;
- Turley's 'Technical Review of Housing Need' (provided at Appendix 3) confirms that higher levels of housing growth (beyond the LHN) should be planned for in order to meet Swindon's economic aspirations and meet the need for affordable homes;
- reliance on brownfield sites within Swindon Town Centre should also be treated with caution, as clearly indicated in the viability evidence provided as background documentation to the current consultation;
- Sufficient headroom and contingency should be built into the quantity of sites allocated within the emerging plan to ensure they result in at least the minimum housing requirement being delivered within the plan period; and
- Further sites need to be identified and allocated for development as part of the emerging plan in order to address the above points, this should include accommodating housing growth at Highworth, of which circa 500 homes can be accommodated at the Twelve Oaks site.

1.6 Gleeson's site at Twelve Oaks will be known to the Council as has been assessed in the evidence base for the plan (re. SWIN18317, Swindon Strategic Housing and Economic Land Availability Assessment (SHELAA) September 2025). Part of the site was also discussed with the officers as part of a submission requesting pre-application advice (ref. S/PM2/23/1223, January 2024).

- 1.7 Gleeson are strongly of the view that the plan as currently drafted makes insufficient allocations for housing, to the extent that there is a real danger that the emerging plan will fail to deliver the requisite level of housing growth necessary to support the economic aspirations of the Borough over the plan period. Further housing sites are required to be identified
- 1.8 We would be grateful for the opportunity to engage directly further with officers in relation to the Twelve Oaks site at Highworth in order review the additional evidence which has now been submitted as part of this response and to discuss the next steps for the plan with the Council.

2. Chapter 4 - Spatial Strategy and Strategic Area Policies

The Plan Period

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

Recommendation

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

Policy SS1 Swindon's Spatial Approach to Growth

- 2.3 The focus for the spatial strategy is that housing, commercial, and industrial growth will occur at Swindon Urban Area and the Strategic Growth Locations. In principle we support the intention to focus growth within the Borough at Swindon, although, as set out below, it is important that a sufficient quantum of available and deliverable sites are identified (including a sufficient contingency) to ensure that housing needs are met in full. This includes the need to ensure that the identified sites are viable.
- 2.4 Part 2 of Policy SS1 states that supplementary growth may also be acceptable within larger villages, small villages and hamlets. The policy text states that this growth is likely to include minor development, service provision and infill and that it should be 'sympathetic to local character'. This strategy as currently drafted makes no reference to the Rural Service Centres within the Borough. This is a crucial flaw in the strategic approach as currently drafted and needs to be addressed. There is a disconnect within the plan between policies SS1 and SS2 in respect of the settlement hierarchy identified (and set out at Table 1 of the plan), which rightly includes Rural Service centres, and the Spatial Approach which references 'Swindon Urban Area and Sustainable Development Locations' and 'Larger Villages, Small Villages and Hamlets', completely omitting reference to the settlements of Highworth, Wroughton or South Marston.

- 2.5 Swindon Town is the major settlement within the Borough, and accordingly should be the primary focus for regeneration, growth and development over the emerging plan period. However, for the detailed reasons set out in our responses to Policy SGL 01 below, we consider that the plan as currently drafted significantly overestimates the likelihood that the Town Centre regeneration sites will deliver the levels of growth anticipated in the timescales set out. It has been the aspiration to regenerate the Town Centre throughout the current plan period and there is clear evidence that timescales for sites coming forward has slipped continually and that there are a range of complex, site specific issues, including major viability issues, that have caused delays.
- 2.6 Continuing to ignore the well evidenced barriers to progression of these (town centre) sites as part of the emerging plan will lead to a repetition of the outcomes recently experienced – i.e. that key regeneration sites will not come forward as anticipated and that other housing sites will need to be identified in order for the Council to maintain a five year housing land supply, and to ensure that the mandatory minimum housing requirement is delivered over the plan period.
- 2.7 There have also been delays with the Strategic Growth Locations (including the New Eastern Villages and Wichelstowe) over the last plan period. Again, we support in principle the continued identification of these locations for growth, and the proposed extensions to them, but they cannot be relied upon to deliver as anticipated. The Council are, in our view, underestimating the timescales needed for homes to be delivered on these sites and failing to take into consideration the lessons learnt in recent years about delays to delivery.
- 2.8 The plan needs to be amended to embed a broader, more resilient approach to the spatial strategy from the outset. Highworth is a key market town within the north of the Borough with a population of circa 8,258 people¹. It is a sustainable location at which a significant quantum of housing growth could be accommodated in the new plan period. Identifying Highworth as a location for such growth would help diversify the spatial strategy and ensure that if there are any delays in delivery at Swindon Urban Area or SGLs other sites, such as the Twelve Oaks site to the north of Highworth can continue to deliver to help ensure that the planned housing delivery remains on track.

Recommendation

- 2.9 Draft Policy SS1 should be amended to reflect the settlement hierarchy and acknowledge the role Rural Service Centres can and should take in delivering the growth aspirations of the emerging plan.
- 2.10 The policy should be updated and Highworth should be identified as a specific, strategic location for growth.

Policy SS2 – Settlement Hierarchy

- 2.11 Policy SS2 sets out the Settlement Hierarchy and is accompanied by Table 1 which lists the settlements. Part 2 of the Policy states; *In line with Policy SS1, the main focus for housing and employment growth will be in the Urban Area Sustainable Development*

¹ Based on the 2021 census

Locations, Urban District Centres, Industrial Locations and Strategic Growth Locations.

This text is a direct repetition of Policy SS1. In addition, whilst it repeats the spatial approach of Policy SS1, the accompanying table (Table 1) does not include reference to the Strategic Growth Locations. As a consequence, the spatial approach is not clearly reflected in the settlement hierarchy. Strategic Development Locations should be added as part of Table 1.

- 2.12 Highworth is identified as a Rural Service Centre, which is a category described as settlements separate from Swindon Urban Area with a more limited (than Swindon) but important range of services and facilities, and usually reasonable accessibility and regular public transport connections to the Urban Area.
- 2.13 We agree that it is correct Highworth is identified as a Rural Service Centre, however Policy SS2 needs amendment. Currently the text links the Strategic Approach detailed in Policy SS1 to the Settlement Hierarchy detailed in Table 1, but the former omits to reference the settlements included as Rural Service Centres. It is our view that the rural service centres can and should make an important contribution to accommodating housing growth over the plan period, this is reflective of their position as the second highest order of settlement, after Swindon Urban Area, in the draft settlement hierarchy.

Recommendation

- 2.14 Policy SS2 requires amendment, clarity is needed as to how the settlement hierarchy relates to the Spatial Approach included in Policy SS1. Policy SS2 should explain the settlement hierarchy and proposed distribution of development and be supported by clear evidence in the background documents to justify how the approach to the distribution of development has been determined.

3. Chapter 5 - Sustainable, High Quality Development

Strategic Policy SP1: Sustainable Development

- 3.1 All proposals for new development must be sustainable; making effective use of land, integrating well into existing routes and connections, and designed to a high-quality (including considerations for carbon reduction in line with policies CSE1 and CSE 2 of this Plan).
- 3.2 The Council will promote high quality design and effective use of land by:
- a) requiring a 'design-led' approach to optimising density and site potential responding sensitively to local distinctiveness.
 - b) supporting brownfield redevelopment (subject to other policies in this Plan).
 - c) encouraging tall buildings where they meet the policy requirements set out in Policy SD5.
 - d) requiring new developments to be safe, accessible and designed to a high-quality.
 - e) requiring developments to preserve or enhance Swindon's heritage assets (where applicable) and be designed in a sympathetic manner to their surrounding character.
 - f) supporting development that aims to create attractive, engaging spaces which are more likely to be well-used and resilient.
 - g) supporting development that improves and facilitates active lifestyles, and improves the wellbeing of new and existing communities, and
 - h) supporting 'meanwhile' uses (where they are policy compliant).
- 3.3 Where infrastructure is required to be provided by new development, the Council will expect this to be appropriately phased, taking account of local infrastructure pressures.
- 3.4 The approval of new development will be conditional on the appropriate water infrastructure and energy capacity being in place. Developers should engage with Thames Water and SSEN (Scottish and Southern Electricity Networks) early in the planning process in line with Policies U1 and U2.

Response and Recommendation

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

3.6 It is also understood that Swindon sits in an area of severe water stress, and the need for liaison with Thames Water is understood, as is the need to secure energy capacity. We would note that connection capacity may be conditional on timescales set out by Thames Water and SSEN, connection capacity will be secured for development but may not be available until a specific date. Planning permission should not be held up until capacity is in place, consideration should be given to connection agreements and timescales provided by Thames Water and SSEN.

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

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

4. Chapter 6 - Places for People

Policy SP2 - Homes for the Community

- 4.1 Policy SP2 identifies that the standard methodology derived local housing need (LHN) figure for Swindon is 1,205 homes per annum. Over a 20 year plan period, this equates to a total housing requirement of 24,100 homes. We do not disagree that the LHN should be the starting point for the level of housing growth to be planned for in the Borough, as per paragraph 62 of the NPPF. However, this is a **minimum** housing requirement, and should be reflected as such in the policy.
- 4.2 As currently drafted, Policy SP2 states that *‘the Council will seek to enable these (housing) targets to be met subject to all relevant policies of this Plan’*. This statement does not provide a clear and unambiguous commitment to meeting housing needs in full in line with the aims of national planning policy set out within the National Planning Policy Framework (NPPF). There is a clear national policy imperative to significantly boost the supply of housing, and so the Plan should more explicitly identify meeting the housing needs in full as one of the critical issues to be addressed. As a consequence any references to LHN within the plan should be referenced as a minimum/‘at least’ figure.
- 4.3 Turley’s ‘Technical Review of Housing Need’ (provided at Appendix 3) confirms that higher levels of housing growth should be planned for in order to meet Swindon’s economic aspirations and meet the need for affordable homes. That Review notes that the existing Local Plan failed to deliver the planned requirement of 1,466 dwellings per annum between 2011 and 2026 (a figure notably higher than now being planned for in the draft emerging Local Plan), with notable consequences that flow from this failure:
- **Population growth in Swindon has slowed**, again by around a third, with the rate of growth in the core working age population also having nearly halved since 2011;
 - **The borough has created fewer than 1,800 of the 19,600 jobs targeted** by the existing Local Plan, making Swindon the worst performing economy of its size in the South West;
 - **House prices have grown at an average rate of 4.5% per annum since 2011**, having barely grown over the prior five years;
 - **Housing affordability has worsened** to a greater extent than seen regionally or nationally, at both the midpoint and entry level of the market; and
 - **Fewer affordable homes have been provided**, during a period in which more have also been lost through Right to Buy.
- 4.4 As such, whilst the Council rightly refers to the outcome of the standard method in stating that there is now a need for **at least 1,205 dwellings per annum** in Swindon, setting this as the housing requirement, as the Council proposes, would hinder the Council’s economic growth ambitions and would fail to meet the identified need for

affordable housing². The scale of this gap, coupled with evidence of worsening affordability, increasing use of temporary accommodation, and rising homelessness pressures, indicates that the draft Plan will not provide an effective or deliverable strategy for meeting identified housing needs without additional site allocations, stronger delivery mechanisms, or flexibility in tenure expectations to ensure viability and maximise affordable provision.

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

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

4.6 However in our view Policy SP1 should list and overview the sources of supply within the plan to explain clearly how the housing requirement will be accommodated.

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

- Windfall sites – 2,818 homes;
- Strategic Allocations (with permission) – 9,949 homes;
- Strategic Allocations (without permission) – 3,498 homes;

² As demonstrated by the Turley's Technical Review, the emerging trajectory would support the delivery of around 5,848 affordable homes over the plan period, equivalent to an average of only 292 dwellings per annum. This would result in a cumulative shortfall of around 974 homes even under best-case assumptions of full policy compliance and delivery.

- New Site Allocations – 8,700 homes;
 - Total 25,796 homes.

- 4.8 Firstly, the above breakdown includes 200 homes in ‘year 21’ from New Site Allocations, i.e. beyond the emerging plan period. The total projected supply for the plan period, as set out within Appendix 3, is 25,596 homes. This should be more clearly set out in the table at Appendix 3.
- 4.9 Secondly, the total number of homes projected to delivery in Appendix 3 differs from the total sources of supply explained at paragraphs 6.4 to 6.7 of the draft plan. Clarity is needed on the number of homes projected to deliver from each source. A full detailed site specific trajectory should be provided setting out all sources of supply for the plan period with an annualised breakdown to set out when each site is projected to commence completions.
- 4.10 In addition, the total projected delivery within the plan period set out at Appendix 3 is only 1,496 homes above the (minimum) LHN figure, just 75³ homes per annum above the minimum figure. This reflects a contingency in housing supply of just 6.2% over the plan period. Considering that circa 11% of the projected supply is from windfall sites (i.e. sites assumed to come forward based on assumptions rather than actual identified supply) we consider that insufficient sites have been identified to deliver a realistic prospect of the minimum housing requirement being delivered in the plan period.
- 4.11 To plan to just exceed the minimum LHN by circa 6.2% is not in line with the national requirement to significantly boost the supply of housing. The housing requirement should be expressed as a minimum, and greater contingency needs to be built into the plan to enable adequate sites to be identified to ensure the minimum requirement is met, and to ensure that an adequate five year supply of deliverable homes is maintained over the plan period. The evidence base for the plan demonstrates that the Council is aware; in the Defining Growth section of the Interim Sustainability Report it is acknowledged;

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

- 4.12 At present the Council suggest that the vast majority of the requirement will come forward on sites which are existing commitments (Strategic Allocations with and without permission 13,447 homes), and on Windfall sites (2,818 homes). Together these elements comprise 67.5% of the supply. Given the current adopted plan period ends in 2026 it is noteworthy that over 13,000 homes appear to be relied on from Strategic Allocations which are not new to this plan; i.e. they were intended to come forward (we assume at least in part) as part of the delivery in the previous local plan period. This includes the New Eastern Villages, Kingsdown, and Wichelstowe. Paragraph 6.6 of the draft plan confirms that 3,498 homes are included in the projected supply for the new plan from sites which were allocated for development in

³ 74.8 homes per annum rounded up

the previous plan but have not to date obtained planning permission. This is a clear indication that sites identified in a plan may not come forward as anticipated and that sufficient contingency needs to be built into future projections for delivery.

- 4.13 We do not dispute that these categories (i.e. existing commitments and previously allocated sites) can and should comprise an element of the housing delivery over the emerging plan period, but at present only new sites to meet 8,500 homes within the plan period are even being considered. This places an undue level of certainty that existing commitments will come forward as planned (particularly when many appear to be rolled over from the previous plan) and, even more difficult to predict, that a significant volume of windfall sites will also come forward.
- 4.14 The over reliance on these sources of supply, without any lapse rate/discount applied to them, compounded with the fact the overall spatial strategy is only planning to just barely meet the LHN without sufficient headroom built in, places the plan in a precarious position where, in our view, it is highly unlikely that the requisite number of homes will actually be delivered within the plan period. The failure to plan to deliver the area's objectively assessed needs as a minimum is contrary to the requirement for the plan to be Positively Prepared (paragraph 36 of the NPPF).

Recommendation

- 4.15 The summary of the trajectory at Appendix 3 should be amended to more clearly reflect the homes that will be delivered within the plan period to 2043, and those that are anticipated to deliver beyond the plan period.
- 4.16 Higher levels of housing should be planned for, beyond the minimum LHN, to meet the Council's economic aspirations, and address the need for affordable housing in the Borough.
- 4.17 A full detailed site specific trajectory should be provided setting out all sources of supply for the plan period with an annualised breakdown to set out when each site is projected to commence completions.
- 4.18 The housing requirement should be expressed as a minimum, and greater contingency needs to be built into the plan to enable adequate sites to be identified to ensure the minimum requirement is met, and to ensure that an adequate five year supply of deliverable homes is maintained over the plan period.

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

- 4.19 Swindon Town is the major settlement within the Borough, and accordingly should be supported in principle as an appropriate location for regeneration, growth and development over the emerging plan period. We support this aspiration and agree that regeneration of this area should be supported by the emerging plan.
- 4.20 However, we consider that the plan as currently drafted significantly overestimates the likelihood that the Town Centre regeneration sites will actually deliver the levels of growth anticipated in the timescales set out. Appendix 1 to the draft plan details a number of sites within the Swindon Central Area, all of which are new allocations and in total consider capable of delivering 4,347 homes in the plan period.

- 4.21 We support in principle the aspiration to regenerate the Town Centre. However this has been an aspiration for some time and there is local evidence that timescales for sites coming forward have slipped continually and that there are a range of complex, site specific issues, including major viability issues, that have caused delays.
- 4.22 The draft plan is accompanied by a Viability Assessment (August 2025, doc 02.03). This considers the proposed site allocations, including brownfield sites in the Town Centre. The report concludes on this matter, at paragraph 12.98, that development of brownfield sites, particularly in the centre of Swindon is challenging, and advises;

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

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

Recommendation

- 4.25 Our recommendation is that in order to ensure the LHN is actually met in the plan period, the plan needs to identify sufficient sites delivering well in excess of this, and to express the figure as a minimum housing requirement throughout the plan. New greenfield sites, and sites outside of the Swindon Urban area will, in our view, clearly need to be identified in order to help meet the scale of housing growth required over the plan period.
- 4.26 We suggest that a contingency of circa 10% is built into the housing to be planned for on new allocations, and that a suitable lapse rate is applied to the existing commitments to account for any sites not coming forward as anticipated.
- 4.27 There should also be a critical review of town centre regeneration sites, and their viability and actual ability to deliver new homes in the plan period. It remains to be

seen whether or not the identification of these sites within the plan will meet the tests of soundness required, and whether ultimately there is sufficient evidence to justify these allocations. We are of the view that the most appropriate action the Council should take is to identify further sites beyond the Urban Area to try and identify a robust plan period supply of housing. Whilst regeneration of the town centre sites should be supported by the Plan, lesser reliance should be placed on them as a key part of the Council's housing delivery strategy (and ability to meet minimum housing requirements).

Growth at Highworth and Scenarios considered in the Interim Sustainability Appraisal

- 4.28 We have some concerns regarding the proposed Spatial Strategy, particularly with relation to a lack of contingency in the level of housing growth planned for, and with the (in our view) overreliance on brownfield urban sites projected to come forward. Other growth scenarios have been considered by the Council and additional growth at Highworth was specifically considered as part of 'Scenario 3' detailed in the Interim Sustainability Appraisal (SA). We support the consideration of Highworth as a sustainable location to accommodate additional housing growth; we consider (for the reasons set out above in relation to the housing requirement) that additional housing sites must be identified if the plan is to be found sound; and we suggest that the Council reconsider elements of the spatial strategy and identify additional sites for housing at Highworth in the next iteration of the plan.
- 4.29 The interim SA considers three reasonable growth scenarios, set out in Table 5.1 which is reproduced below;

Table 5.1: The RA growth scenarios (constants greyed-out)

Supply component	Scenario 1 Preferred	Scenario 2 + North Swindon	Scenario 3 + Highworth
Completions and commitments	13,598	13,598	13,598
Windfall	0	0	0
Swindon town centre	4,358	4,358	4,358
The wider urban area	2,112	2,112	2,112
North urban edge	513	1,013	513
Northeast urban edge	515	515	515
East urban edge	2,022	2,022	2,022
South urban edge	1,620	1,620	1,620
Wroughton	1,031	1,031	1,031
Highworth	53	53	650
Total homes (2023 - 2043)	25,822	26,322	26,419
Average homes per annum	1,291	1,316	1,321
% above LHN (24,100 or 1,205 pa)	7%	9%	10%

4.30 We note that the Appraisal Summary relating to the three growth scenarios (contained at section 6 of the SA) acknowledged that there are key important benefits to planning for a higher growth scenario (compared to the lower option identified as ‘preferred’ in the current draft plan. These are set out at paragraph 6.16.5 and in short state;

- There is a case to be made for a higher supply buffer commensurate with the level of delivery risk across the proposed supply (notably the town centre and NEV) and learning lessons from the adopted Local Plan (i.e. the lack of a 5YHLS in the years since its adoption);
- The additional sites for Scenarios 2 and 3 (the latter would include 600 homes at Highworth) may deliver homes early in the plan period which could assist in ensuring that the Council can maintain a five year housing land supply over the crucially important early years of the plan period; and
- Sites in Scenarios 2 and 3 would be well placed to deliver affordable housing (including social rented), family housing and potentially specialist housing.

4.31 These key points are raised in the Council’s own evidence base to the plan. Clearly Swindon are aware of the issues with housing delivery experienced in recent years and have options they have already identified that could help alleviate these problems going forward and ensure more resilience is built into the emerging plan from the outset.

- 4.32 Prior to its abandonment, the previous Swindon Borough Local Plan Review (July 2021), draft Policy SP2 set out a Spatial Strategy for the Borough. This identified that sufficient land would need to be allocated to deliver at least 21,100 homes over the (then) plan period 2018-2036. The strategy identified that outside of Swindon and the Strategic Allocations development would be located primarily at Highworth and Wroughton which are the most accessible rural settlements and maintain the largest range of facilities. Highworth and Wroughton are the only 'tier 2' settlements within the Borough and are the most sustainable locations to accommodate growth outside of Swindon Town. Whilst this plan was abandoned, it is important to note that identifying significant growth at Highworth was previously considered a preferred strategy for the Council. It remains a suitable strategy, and in our view is necessary if the plan is to identify sufficient additional sites to provide more certainty that the minimum housing requirement can be delivered in the emerging plan period.
- 4.33 Our view is that additional sites will need to be identified within Swindon Borough if the genuine local housing need is to be met in the emerging Borough plan period. It is likely that Highworth, as one of the most sustainable settlements within the administrative area outside of the urban area of Swindon, will need to accommodate some of this housing growth.
- 4.34 Our clients' site at the former Twelve Oaks Golf Club can contribute to meeting the housing requirement for Highworth and would bring a suite of benefits, such as new public open space, a policy compliant level of on site affordable housing, and ecological enhancement. There is potential to either re-use of the existing golf club house on site for a new community facility or to provide a new community and retail space as part of any development proposals. We consider that land at the former Twelve Oaks Golf Club would form a logical and comprehensive extension of Highworth, and would deliver a suite of benefits for the local community. The site our clients have interests in extends to circa 30 hectares and, subject to further work on constraints, opportunities and masterplanning, is capable of delivering up to around 500 new homes.

Recommendation

- 4.35 Additional sites will need to be identified within Swindon Borough if the genuine local housing need is to be met in the emerging Borough plan period. It is likely that Highworth, as one of the most sustainable settlements within the administrative area outside of the urban area of Swindon, will need to accommodate some of this housing growth. The options in the interim SA should be revisited as part of the next stages of the plan and Option 3, which includes additional homes at Highworth (and in our view Highworth is capable to accommodating at least 600 homes) should be identified as the preferred option.
- 4.36 The Twelve Oaks site is readily available and deliverable as a site appropriate for further consideration. It is free from any in principle constraints that would deem it unsuitable for residential development and has the potential to deliver much needed new homes at one of the most sustainable locations in the Borough outside of Swindon town. The site should be identified in the emerging local plan as a new site allocation capable of delivering circa 500 new homes in the plan period.

5. Chapter 9 - An Environmentally Friendly Swindon

SP6 – Climate Stability and the Environment

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

CS1: Carbon Reduction and Sustainable Design in new development

Response

- 5.6 Policy CS1 sets out the Council's strategy for carbon reduction and sustainable design in new development. This includes setting a number of sustainable design requirements around climate resilience, making use of zero / low carbon technologies, and enhancing energy efficiency. It also requires development to minimise energy consumption, minimise operational and embodied carbon emissions, and consider the BREEAM Community Standard.
- 5.7 The need for sustainable development and reducing carbon emissions is understood and supported. The Government's FHS, FBS and related updates to the Building Regulations and other guidance, i.e. the use of climate change allowances in assessing flood risk provide a basis for delivering sustainable, climate resilient, and low carbon development.

- 5.8 In setting out this policy regard should be given to the December 2023 Written Ministerial Statement (WMS)⁴ which sets out clarity on the development and application of local energy efficiency standards in the context of advancing national policy. The WMS notes that the introduction of Part L 2021 supersedes the 2015 WMS which set guidance for Local Authorities to not set energy efficiency standards beyond Code for Sustainable Homes Level 4. The WMS goes on to note that the 2025 Future Homes Standard (FHS) will mean, *‘that homes built to that standard will be net zero ready and should need no significant work to ensure that they have zero carbon emissions as the grid continue to decarbonise. Compared to varied local standards, these nationally applied standards provide much-needed clarity and consistency for businesses, large and small, to invest and prepare to build net-zero ready homes’*.
- 5.9 The WMS states, *‘the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale.’*
- 5.10 In this context elements of this policy which require development to ‘minimise’ emissions in relation to operational emissions and embodied carbon, setting out open ended requirements which contradicts the WMS and FHS requirements on operational emissions.
- 5.11 There are also implications on viability as an open-ended statement such as this is open to interpretation which is unlikely to have been fully considered at this stage. The Future Homes Hub report, Ready for Zero, prepared to inform the 2025 FHS sets out costs for a range of potential specifications to reduce operational emissions⁵. ‘Minimising carbon emissions’ could result in significant additional costs. The Viability Assessment which accompanies the Plan sets out additional costs for scenarios beyond the FHS, and scenario CCS4, drawing on the Future Homes Hub reporting which includes, ‘minimising space and water heating’, is estimated to increase costs by c.19% beyond current Part L Regulations. Similarly in setting a requirement to ‘minimise embodied carbon’ leaves an open-ended requirement which could add significant cost to development and is not considered as part of the current viability assessment.
- 5.12 The evidence base includes the Swindon Carbon Inventory which provides background information to support the Plan. The Carbon Inventory sets out the baseline emissions for Swindon and evidence for setting local targets and integrating climate objectives into the Local Plan. While the Carbon Inventory identifies the scale of local emissions and challenges in reducing carbon emissions limited information is provided on the application of policy to reduce emissions from new development. No analysis has been included at this stage on potential interventions, alignment with the FHS and WMS, or including embodied carbon requirements.

⁴ <https://questions-statements.parliament.uk/written-statements/detail/2023-12-13/hcws123>

⁵ [Ready for Zero - Evidence to inform the 2025 Future Homes Standard -Task Group Report FINAL- 280223- MID RES.pdf](#)

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

5.15 Below recommended amendments are set out to the policies;

Sustainable Design

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

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

Carbon Reduction

2. Development proposals should:

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

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

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

CSE2: Whole Life Carbon Assessments (WLCA)

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

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

- 5.16 Policy CSE2 sets out a requirement for major development proposals to undertake a Whole Life Carbon Assessment (WLCA) as part of proposals, using the RICS methodology. Typically, this would require the assessment of the upfront embodied carbon operational emissions, maintenance and end of life of each building proposed.
- 5.17 It is understood that as the FHS is introduced and development switches to electricity-based strategies the upfront embodied carbon of development remains a significant proportion of a development's lifetime carbon emissions. Understanding the upfront embodied carbon and reducing this is therefore a key consideration and undertaking a WLCA is supported.
- 5.18 However, it should be noted that undertaking a WLCA requires detailed information of house types proposed and is therefore only likely to be applicable for Full, or Reserved Matters applications, there will be insufficient information at the outline stage to provide a meaningful assessment. Furthermore, undertaking a WLCA increases costs and should only be undertaken on proposed house types, allowing an assessment to be made of the development as a whole as part of a proportionate approach. It is also not appropriate to consider maintenance and end of life emissions; these are ultimately a function and responsibility of the building owner. We would recommend that this policy focuses on the upfront embodied carbon of new development (Stages A1-A5), i.e. the materials and construction carbon which can be influenced by the developer.
- 5.19 It is noted that the viability assessment incorporates this policy into the assessment of Policies SP6 and CSE1, however, no direct cost allowances has been included for the preparation of a WLCA, the policy needs to be updated, and a cost considered.
- 5.20 As noted above some minor amendments are proposed to this policy.

1. Major development proposals over 49 units, or 4,999 m² of floorspace are required to undertake whole life-cycle carbon assessments, focussing on upfront embodied carbon (Stages A1-A5) to support their proposals

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

6. Chapter 10 – A Healthy, Socially Connected Swindon

U1: Wastewater, Sewage Infrastructure and Water Supply

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

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

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

U3: Energy Networks

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

**Appendix 1: Vision Document, Twelve Oaks; a
new Sustainable Neighbourhood for
Highworth, October 2025**



TWELVE *OAKS*

A New Sustainable Neighbourhood for Highworth

OCTOBER 2025

1. Introduction

Overview

This document has been produced by The Environmental Dimension Partnership Ltd (EDP) on behalf of Gleeson Land to promote the former Twelve Oaks Golf Club (hereafter referred to as 'the site'), as a new sustainable neighbourhood for Highworth.

EDP has extensive experience of planning, designing and delivering high quality, sustainable and environmentally sensitive projects across the UK. EDP's ethos is to integrate their combined technical environmental knowledge with best practice design to ensure proposals are responsive to individual site merits and opportunities.

This document sets out:

- An understanding of the Site and its context with expert advice provided on landscape, arboriculture, heritage, drainage, highways and masterplanning matters.
- A summary of known development considerations and potential site opportunities.
- A high-level Concept Masterplan which illustrates one way in which the Site could come forward for development. This exercise has been informed by our extensive experience of similar development sites and is subject to further appropriate technical survey and review.

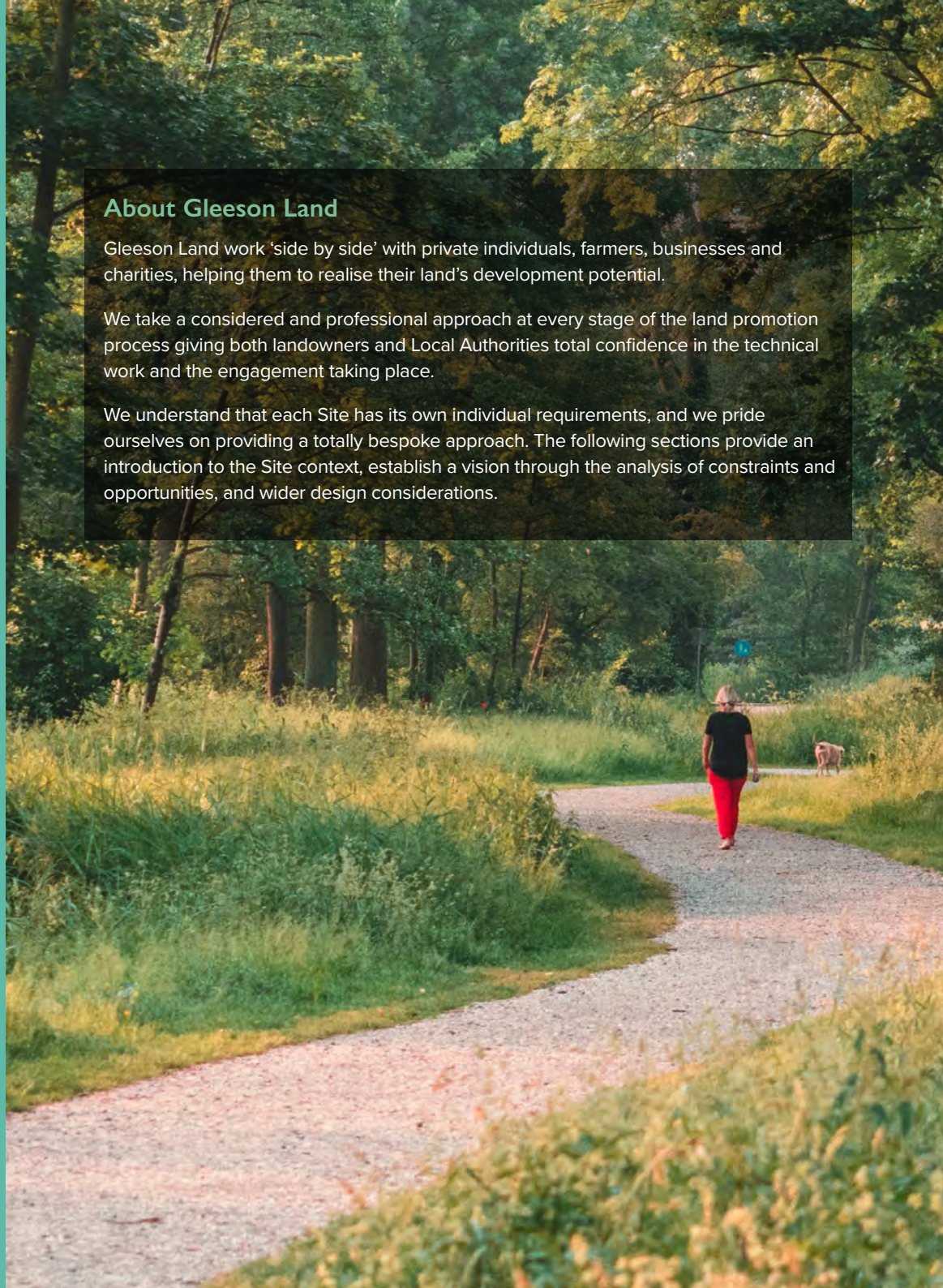
This document should be read in conjunction with the representations made by Gleeson Land to the Swindon Borough Local Plan Issues and Options consultation (October 2025).

About Gleeson Land

Gleeson Land work 'side by side' with private individuals, farmers, businesses and charities, helping them to realise their land's development potential.

We take a considered and professional approach at every stage of the land promotion process giving both landowners and Local Authorities total confidence in the technical work and the engagement taking place.

We understand that each Site has its own individual requirements, and we pride ourselves on providing a totally bespoke approach. The following sections provide an introduction to the Site context, establish a vision through the analysis of constraints and opportunities, and wider design considerations.



The Opportunity for Highworth

Gleeson Land is committed to delivering new homes for Highworth within an **environmentally responsible and high quality new neighbourhood**.

This document illustrates that Twelve Oaks has the potential to deliver much-needed new housing within a **network of high-quality green spaces**, connected to services and facilities.

The site has been shown to be **technically unconstrained** with the opportunity to deliver **new community resources** which would benefit both **new and existing residents**.

The site is **visually and physically connected** to the residential areas of north Highworth and immediately adjoins the town's primary employment area.

New homes would be visually contained within an enclosed network of existing vegetation, limiting environmental impacts of the wider landscape and creating the potential for a sustainable modern, vernacular to **create a truly unique place**.



APPROXIMATELY 500
SUSTAINABLE NEW HOMES



POLICY COMPLIANT
AFFORDABLE PROVISION



OVER 50% OF THE SITE
AS FUNCTIONAL GREEN
SPACE



A NEW HIGHWORTH
PARK RUN ROUTE



WETLAND MEADOW
BIODIVERSITY AREA



LOCAL RETAIL AND
COMMUNITY HUB



DESTINATION PARKLAND AND
PLAY FOR HIGHWORTH



ACTIVE TRAVEL PRIORITIES
AND MOBILITY HUB

2. A Sustainable Location

Highworth's Options for Growth

Highworth is a historic market town with a distinct character borne from both its elevated rolling hilltop location, and agricultural heritage, and wealth.

The town benefits from a nucleated form founded at the historic junction of roads, connecting Highworth with nearby Cricklade, Lechlade and Shrivenham. The historical importance of the settlement is reflected in the Conservation Area designation centred on the historic marketplace, but also in the numerous scheduled monuments to the immediate east of the town, which limit opportunities for growth to the south and east.

Highworth also benefits from the diverse landscape of Pentylands Country Park, which encircles the north-west of the town. The park lies within a short walk of the site, accessible via an existing Public Right of Way (PRoW). Pentylands is a valuable resource for residents, but at the same time, limits opportunities for development to the north-west of the settlement.

South of Highworth, a network of PRoW's and permissive paths provide access to valuable open space, which also contains substantial woodland planting which frames the southern edge of the settlement.

Twelve Oaks - An Accessible Site

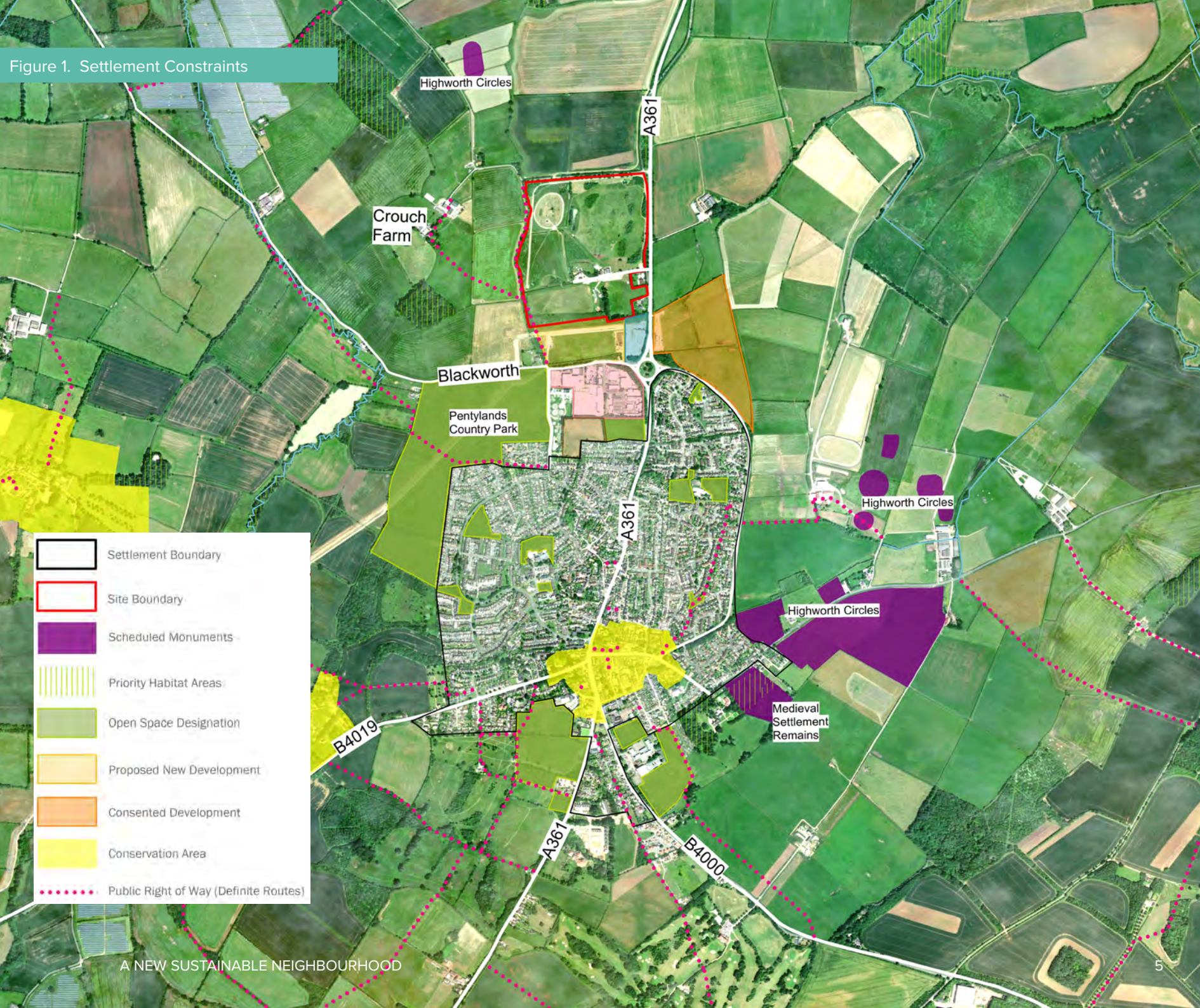
Twelve Oaks lies within 2km of the centre of Highworth Town and is only a short distance from the foodstore to its south, aligning with the Accessibility criteria set out in the Swindon Residential Design Guide.

The site provides the opportunity to deliver a walkable (and sustainable) neighbourhood for north Highworth as part of a focused growth strategy, including consented and submitted planning applications for two residentially-led schemes. These forthcoming schemes also serve to connect Twelve Oaks with employment opportunities at Blackworth Industrial Estate, immediately south of the site.

Local bus routes (services 64 and 77/76) run past the site, with two additional services available nearby. The opportunity exists to explore a series of potential bus route improvements, including provision of stops on the A361, adjacent to the site; with possible enhancements to the service frequency; diversion of one (or more) of the frequent routes into the site; and consideration of a demand-responsive service to supplement existing services, if warranted.

In addition, the possibility of a mobility hub located near the site access could offer opportunities for cycle stands, maintenance kits and bike doctor days and could be part of wider events exploring the Swindon Flyer Routes nearby. The mobility hub could also incorporate Electric Vehicle (EV) charging points and bus stops.

Figure 1. Settlement Constraints



3. The Site and Surroundings

Site Description

The site itself is a former golf course of circa 30 hectares (ha), and comprises a number of remnant features associated with this use.

The site is broadly rectangular in shape with the exclusion of an inset in the south-eastern corner comprising two residential properties within vegetated grounds. The site also contains a number of built features, including farm and residential buildings, and a horse gallop/training area.

The site includes small copses of trees, occasional small groups of trees and large areas of grassland, which are currently unmanaged. Denser tree belts are present on the site boundaries: to the east bordering the A361; to the north bordering a minor road; and to the west, bordering open farmland.

There are also 'hard' elements, including pathways, lighting columns and other features including the derelict driving range, which are characteristics of its previous use.

In this regard the site contrasts with the surrounding area, which is predominantly arable and grazing farmland, interspersed by mature hedgerows with hedgerow trees. The site is not extensively visible from the surrounding landscape, although where visible this contrast is evident by the different colour of the vegetation as a result of the artificial nature of the landscape. The hard elements provide a sense of the previously developed nature of the site, and it is evident that the site is not agricultural land.

The images below show how the character of the site appears different and contrasting to the surrounding landscape.



Figure 2. Village Context



PENTYLANDS
COUNTRY PARK

ALLOCATED
DEVELOPMENT

BLACKWORTH
INDUSTRIAL ESTATE

PUBLIC RIGHTS OF
WAY

CROUCH HILL

PROPOSED DEVELOPMENT
AT LECHLADE ROAD
(CARE HOME AND
RESIDENTIAL)

ALDI
SUPERMARKET

ROUNDHILLS MEAD

LAND EAST OF ROUNDHILLS
MEAD - POTENTIAL FUTURE
DEVELOPMENT

A361

ROUNDHILL FARM

A NEW SUSTAINABLE NEIGHBOURHOOD

4. Environmental Overview



Landscape

The site is not within any landscape policy areas, nor identified as being within any policy area within the Neighbourhood Plan. From a landscape and environmental policy perspective, the site is not constrained.

There is a PRoW which runs along the site's western boundary, from which there will be open views across the site (where gaps in riparian vegetation and topography allow), but is otherwise fairly well contained. There are limited longer-range views from Crouch Hill.

The site sits within the Thames Vale character area, and there are a number of key characteristics which are relatable to the site and its local context, including:

- Generally flat, low lying large scale valley (75m-80m);
- Occasional areas of higher ground;
- Drainage ditches provide alternative means of water removal;
- Very few woodlands, except on areas of higher ground, as at Crouch Hill;
- The site is not within any landscape policy areas, nor identified as being within any policy area within the neighbourhood plan. From a landscape and environmental policy perspective, the site is not constrained;
- Hedgerows & occasional trees; and
- The A361 runs south-north to the River Thames crossing point at Lechlade.

The characteristics are common of the Thames Vale landscape; and are therefore quite generic and not overly sensitive, given it's previously managed and now degraded status.

The site sits adjacent to the Employment Allocation to the south, which provides an existing and emerging, (when built out) developed site context.

Development Considerations set out by the Landscape Character Assessment, which have been considered in proposals:

- Ensure that the scale and massing of development do not adversely affect the area's perception of remoteness;
- Retain views and vistas to key local settlements and landmarks, for example, local churches;
- Where appropriate, provide planting that reinforces existing hedgerows, compensating for trees lost to Dutch Elm disease during the 1970s;
- Ensure that any woodland planting does not prejudice existing vistas;
- Reflect the high visibility of this area from the Midvale Ridge;
- Where appropriate, restore former landscape features such as meandering river channels, where these would benefit the landscape and its wildlife; and
- Ensure the proposed development is easily accessible through new landscape public open spaces for the wider community to enjoy.



Existing oak trees on the northern boundary overlook a peripheral trackway

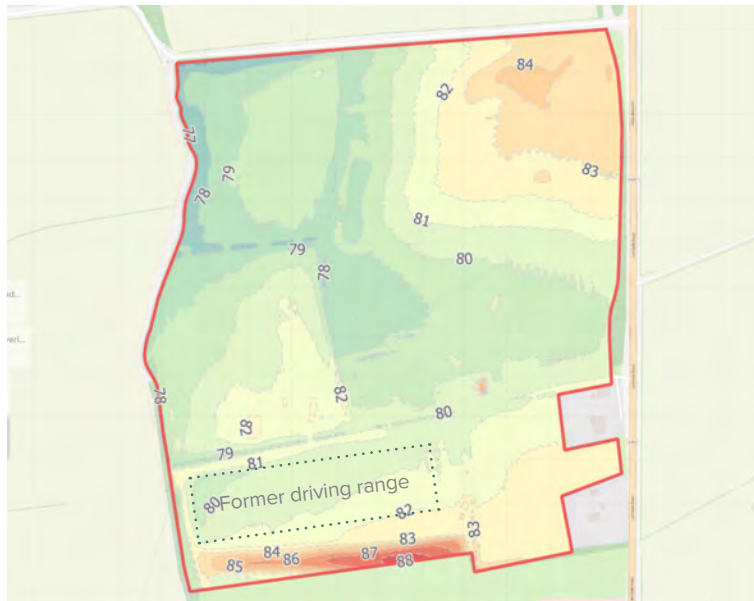


Topography

The site land is generally flat with localised undulations and a shallow valley running broadly north-south. A watercourse bounds the western Site boundary with a low point in the north-western site corner.

To the south, made ground creates a bund enclosing the southern corner boundary and, while excavated land lowers the levels in front of the former driving range.

Within the wider landscape the site sits at approximately 80m AOD. This is in contrast to central Highworth at approximately 135m AOD. This change in elevation affords excellent visual connectivity between the site and the town, including numerous views toward St Michael's Church.



Heritage

The site does not contain any designated heritage assets, so there are no 'in principle' heritage constraints to the delivery of the site for development.

The nearest designated heritage assets are scheduled monuments of the 'Highworth Enclosures' around North Leaze Farm. While the site does not impact these assets or restrict development, planning must consider their settings and strengthen northern boundaries to minimise changes to the monuments' surroundings.

The Wiltshire and Swindon (HER) shows that previous archaeological work on the site, including surveys and trench evaluations. Findings suggest the site holds archaeological interest, with potential for prehistoric settlement and agricultural remains below ground.

The evidence suggests no significant archaeological remains on the site that would limit development. However, further investigation may be needed to support a planning application.



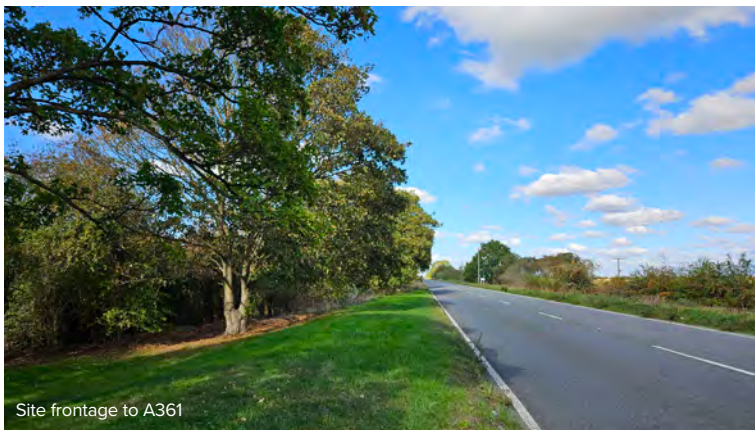
Highworth and St Michaels Church tower as seen from the southern site boundary



Highways, Access and Connectivity

The site is proposed to be accessed via a new priority junction onto the A361 positioned centrally along the site's frontage. The arrangement will include a ghost island right-turn lane, to facilitate safe waiting and turning of vehicles. This junction would be supplemented by an emergency access, situated towards the southern end of the site, which will take the form of a 3.7m-wide footpath/cycleway to accord with fire access requirements. The emergency access would be subject to collapsible bollards (or similar) to ensure that it is not used for general traffic.

The extensive public highway and significant site frontage onto the A361 provides an opportunity to deliver a shared cycleway/footway linking the site to the existing pedestrian/cycle infrastructure to the south, enabling access to a range of local facilities and amenities. Opportunities also exist to improve connectivity around the Aldi roundabout, which will benefit the wider community as well as provide links from the development site to existing and future communities.



Site frontage to A361



Drainage

The site lies wholly within Flood Zone 1 - an area of low probability of flooding from rivers and the sea. There is a designated Main River running south-north from Pentylands Lane along the western boundary of the site, which ultimately joins the River Thames.

From review of the Long-Term Flood Risk Information and Flood Risk from Surface Water Mapping, the site lies in an area at predominantly 'very low' risk from surface water flooding. There is a corridor of high risk of surface water flooding along the western boundary associated with the Main River. There is an area of high risk of surface water flooding associated with the existing pond on site. The maps indicate there is a surface water flow route that flows east to west through the centre of the site, and another from the pond to the north.

The majority of the site is at low risk of flooding from all sources.

The maps indicate that there is an area at risk of surface water flooding to the south of the pond; this extent will be reviewed to confirm the extent of risk present.

From a review of the publicly available British Geological Survey (BGS) Mapping, the site is underlain with Oxford Clay Formation – Mudstone. Given the underlying bedrock, an infiltration-led surface water drainage strategy is unlikely to be viable.



Ecology

The nearest international statutory designation is North Meadow and Clattinger Farm Special Area of Conservation (SAC), which is 9.8km to the west. The site lies outside of the SAC's zone of influence for recreational disturbance, and there are no other potential impact pathways. No other international statutory designations are present within 15km such that other impacts can also be ruled out.

The nearest national statutory designation is Cotswold Water Park Site of Special Scientific Interest (SSSI), which 4.4km to the north. The SSSI is primarily designated for its bird populations and therefore potentially sensitive to public access. However, access to the SSSI is managed and controlled with a large proportion not open to the public, such that no adverse impacts are predicted. No other statutory designations are present within 5km such that other impacts can also be ruled out.

Being a former golf course, the site contains a range of habitats including grassland, woodland, scattered trees and a pond. Accordingly, it is likely that a range of protected and notable species will be present, which will require further investigation/survey to inform a planning application. However, impacts can be avoided or minimised through sensitive design and through habitat creation and enhancement within a network of high-quality green spaces.



Existing water body on Site with distance view of Highworth town centre



Arboriculture

The site contains a series of woodland copses, individual trees, and existing woodland belts that contribute valuable amenity and ecological value. No trees on or adjacent to the site are protected by Tree Preservation Orders (TPOs), and the site is not within a conservation area or designated Ancient Semi-Natural Woodland. There are no priority habitats, veteran trees, or notable trees recorded within the site. A high-level survey identified 24 notable tree features—9 individual trees and 15 groups—with 6 rated as high quality (Category A) and 18 as moderate quality (Category B) under BS 5837:2012. The retention of high-value trees is recommended where practicable, with development designed to avoid root protection areas, to preserve the ecological and landscape value of the site.

The site features woodland copses, tree belts, and individual trees that provide valuable ecological and landscape assets. No protected, veteran, or notable trees are present, but 24 key tree features—6 high quality and 18 moderate—should be retained wherever possible. Development can be designed to respect these arboricultural features, maximising their environmental and visual contribution.



Existing vegetation on Site

Key to Figure 3:



5. Key Design Considerations

Figure 3 illustrates the key design considerations identified from initial environmental and technical studies, which are summarised below.

Access and Connectivity

- Vehicular access to be taken from A361 comprising one primary access and one emergency access.
- Additional pedestrian connectivity to be facilitated to the western and southern boundaries.

Landscape and Visual

- Consider new landscape planting to the west and north to limit views from the PRoW and to help create a consolidated settlement edge.
- Consider incorporating distant views to the wider landscape.

Historic Environment

- Strengthen northern boundaries to minimise changes to the nearby scheduled monuments.

Drainage

- Areas of the site are identified as at potential risk of flooding from surface water and further consideration should be given to development in these locations.
- Potential to integrate a network of sustainable drainage systems to work with natural flow patterns on site.

Topography

- Retain visual connections with Highworth and St Michael's Church where practical.
- Utilise the landscape bund for functional open space taking advantage of panoramic views.

Acoustics

- Consider setback and orientation of built form adjacent to the A361 site frontage.

Existing Vegetation

- The site benefits from a number of woodland copses, singular trees and existing woodland belts. Several of these features are likely to provide valuable ecological habitat and an established landscape setting, which should be retained and where possible, connected via a network of landscape spaces.

Utilities

- A series of overhead electrical power lines cross the site which can be diverted as part of proposals.
- An existing drainage easement bounds the site to the west and will be excluded from development.

Existing Structures

- All existing buildings on site are assumed for removal.
- Opportunity to retain the alignment of some peripheral tracks as part of a 2.5km Park Run loop around the site periphery.

Figure 3. Key Design Considerations



6. Concept Masterplan

Development Summary

- ① Approximately **500 sustainable new homes** of varying sizes, types, tenures and densities appropriate to need and location.
- ② Provision of a central **Community/Retail space** located to serve the new neighbourhood but with ease of access to the A361 and passing traffic and incorporating a new Mobility Hub to prioritise active travel.

Over 50% of the site retained as Open Space, including:

- ③ A series of **Linked Landscape Corridors** creating an established landscape setting to the development and direct access to nature and active recreation for all new homes, as well as additional public open space available as a benefit to the wider existing community in line with best practice principles.
- ④ A formal **Central Park** and potential **Destination Playground**.
- ⑤ Opportunity for a series of **Children's and Youth Provision** within landscape areas.
- ⑥ **Wetland Meadow Landscape** at the lowest point of the site.
- ⑦ **One Primary Access** and one Emergency Access Point - all taken from the A361.
- ⑧ A series of cascading **Surface Water Attenuation Areas** located outside of known areas subject to fluvial and surface water flooding.
- ⑨ **New Woodland Planting** - primarily provided as an undulating belt adjacent to the western boundary to filter views from Crouch Hill and protect the watercourse and associated habitats.
- ⑩ Opportunity for a network of **Active Travel Priority Routes** including a 2.5km **Park Run Loop** with a new Linear Parkland at the site periphery.



Figure 4. Concept Masterplan

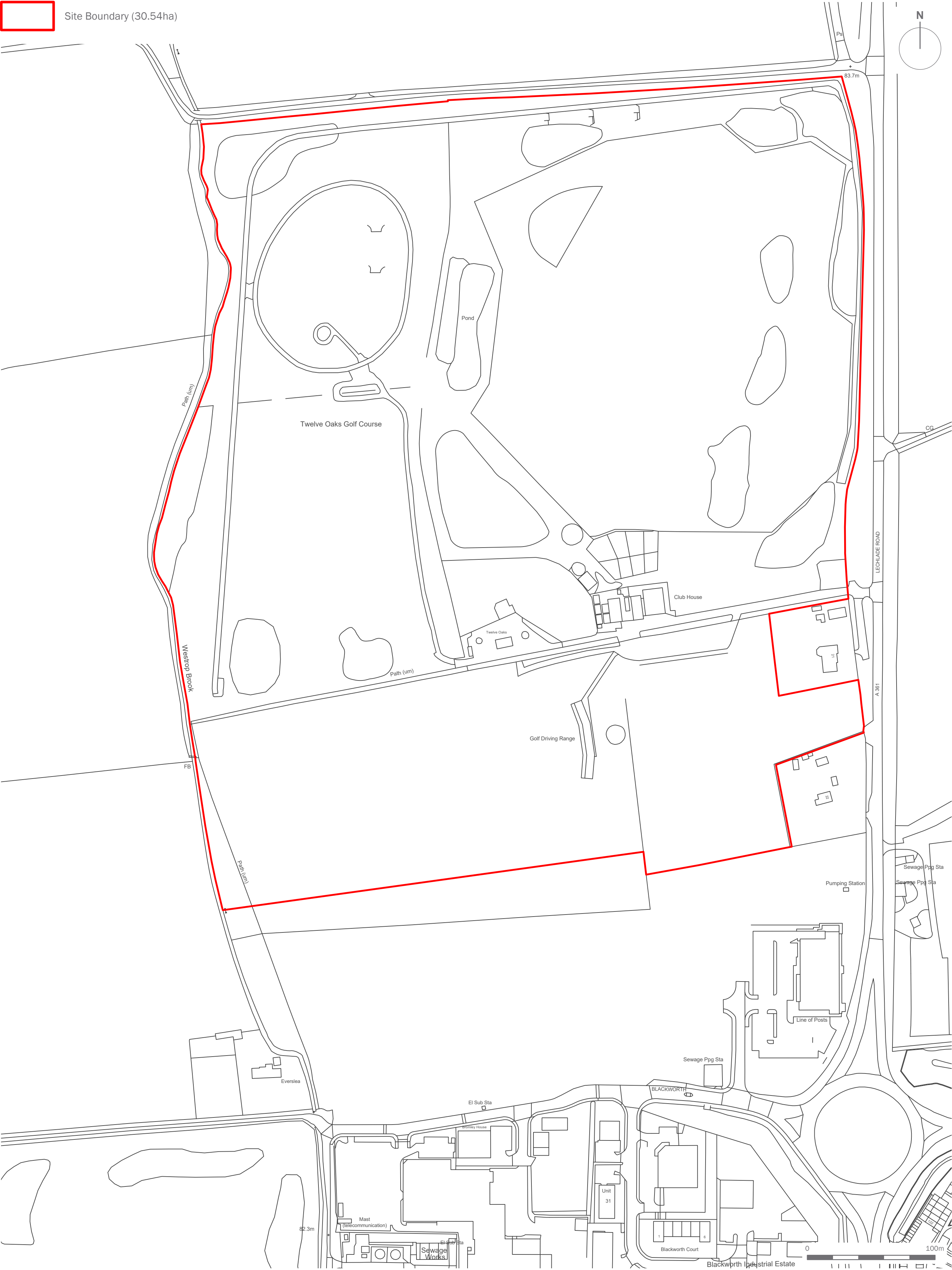




The Environmental Dimension Partnership Ltd
www.edp-uk.co.uk

	Report Ref: edp9026_r001			
	Author	Formatted	Peer Review	Proofed by/Date
r001_DRAFT	CGr	JGo	PWi	PWi/240924
r001a_DRAFT	CGr	ZMi	PDa	
r001b	CGr	ZMi		LLI/091025
r001c	CGr	ZMi		

Appendix 2: Location Plan, ref edp9026_d009



the environmental
dimension partnership

Registered office: [redacted] - www.edp-uk.co.uk [redacted]

date	13 OCTOBER 2025
drawing number	edp9026_d009
scale	1:2,000 @ A2
drawn by	ZMi
checked	CGr
QA	OSh

client	Gleeson Strategic Land
project title	Highworth Golf Club
drawing title	Site Boundary

Appendix 3: Technical Review of Housing Needs in Swindon, October 2025

Technical Review of Housing Needs in Swindon

October 2025



Turley

Contents

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

1. Introduction

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

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

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

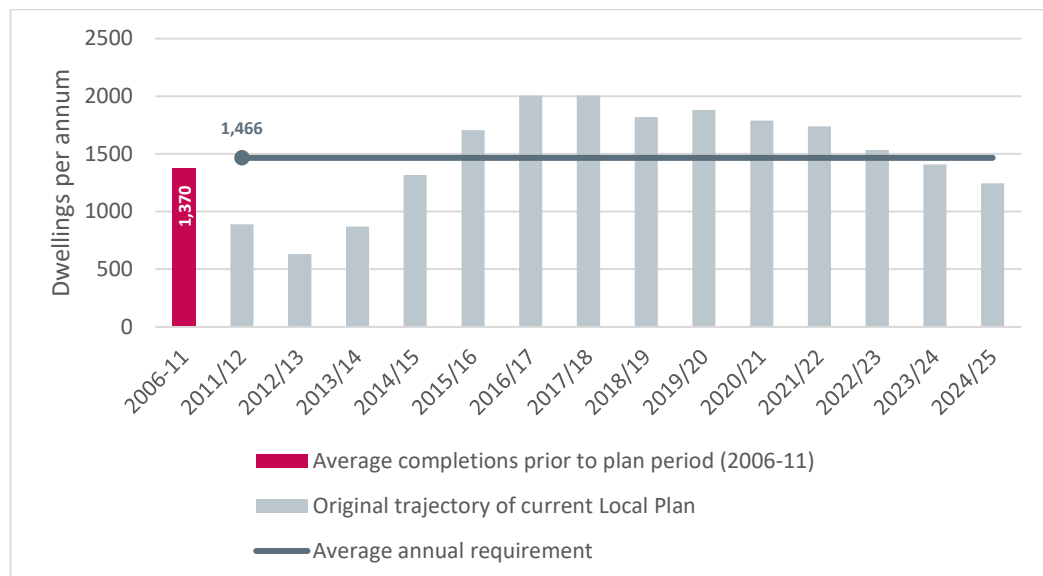
2. Context for the New Local Plan

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

Housing delivery falling short

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

Figure 2.1: Adopted Requirement and Intended Housing Trajectory



Source: Swindon Borough Council; MHCLG

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

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

⁴ *Ibid*, paragraphs 3.23 and 3.24

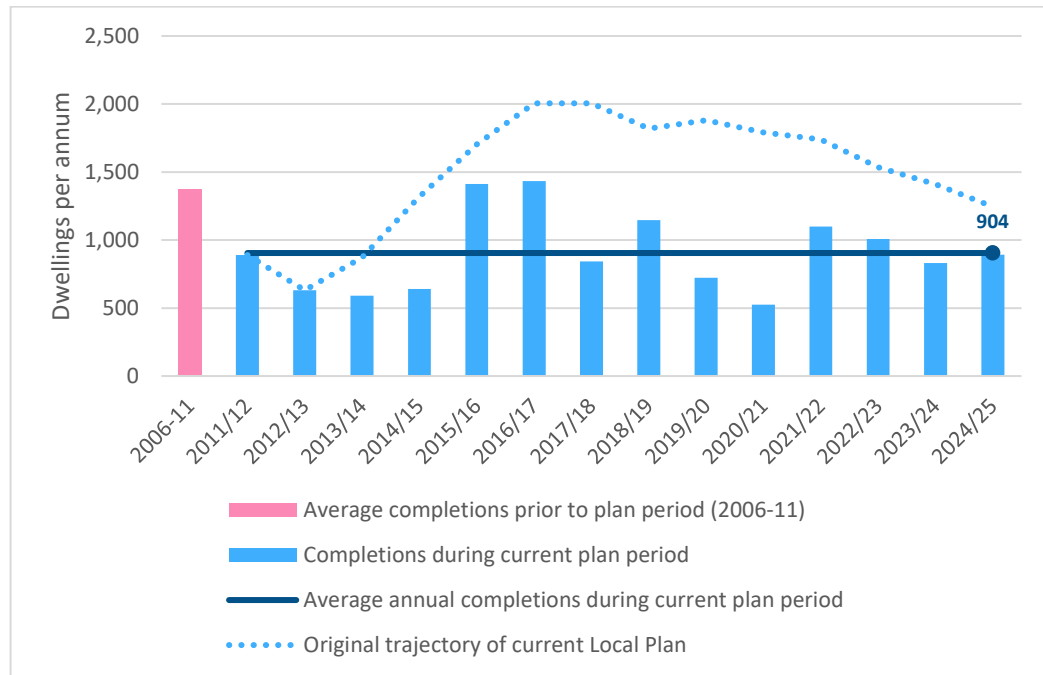
⁵ *Ibid*, Appendix 5

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

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

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

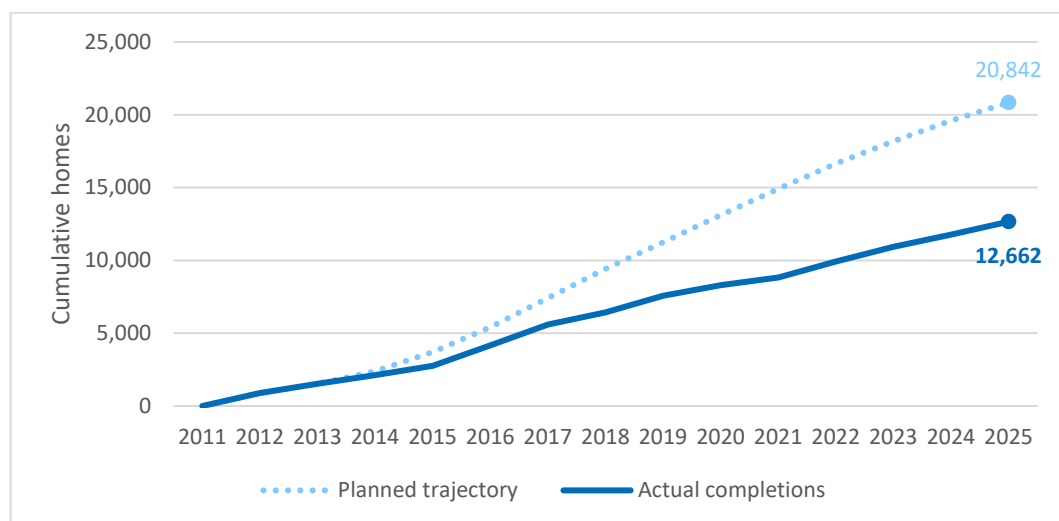
Figure 2.2: Completions vs. Previous Delivery and Planned Trajectory



Source: Swindon Borough Council; MHCLG; Turley analysis

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

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

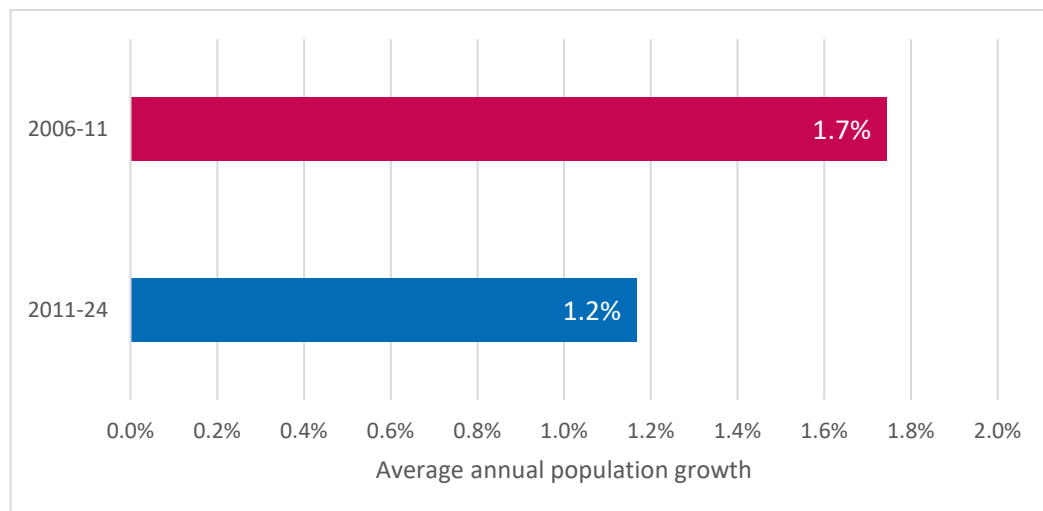


Source: Swindon Borough Council; MHCLG

Slowing population growth

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

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



Source: ONS

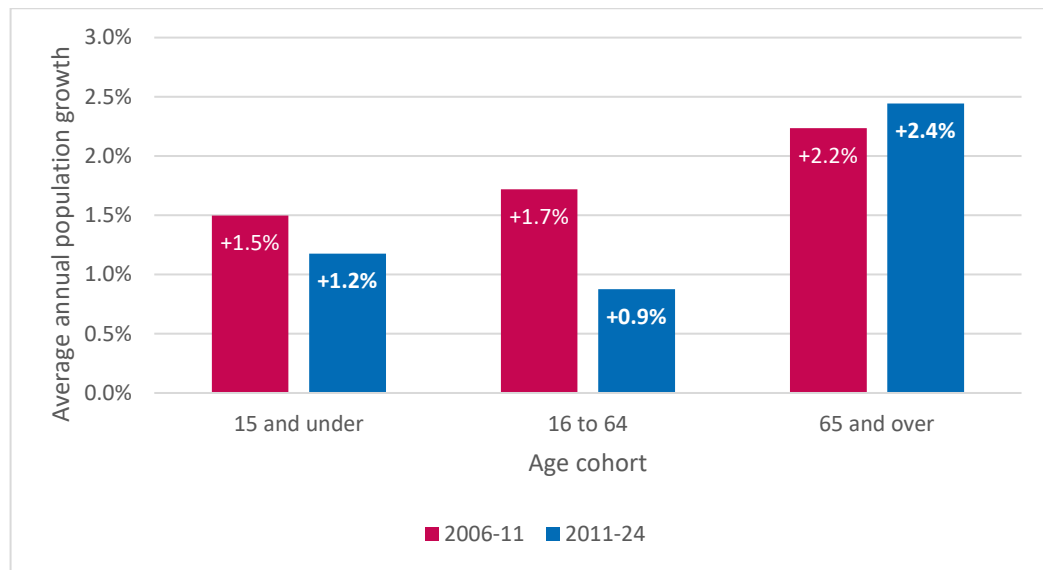
- 2.8 The slowdown has been even more pronounced for the working age population, aged 16 to 64. While this too was previously growing at a rate of 1.7% per annum over the five years to 2011, it has since grown barely half as quickly at an average rate of only 0.9% per annum¹⁰. The ageing of the population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

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

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

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

Figure 2.5: Benchmarking Average Annual Population Growth by Age Cohort



Source: ONS

Limited job growth

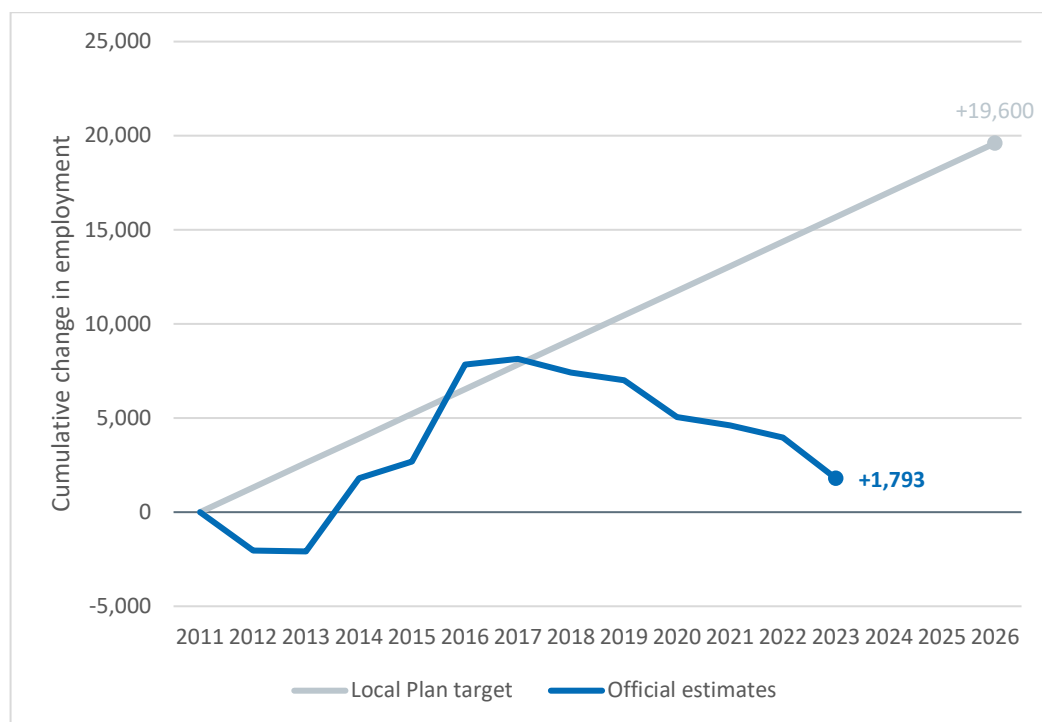
- 2.9 The slowing growth of the working age population will have likely squeezed the local labour market, with the near-halving of the unemployment rate a further sign of the growing lack of latent labour in Swindon¹¹.
- 2.10 This will have almost certainly contributed towards the borough's relatively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

Space intentionally left blank

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

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

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



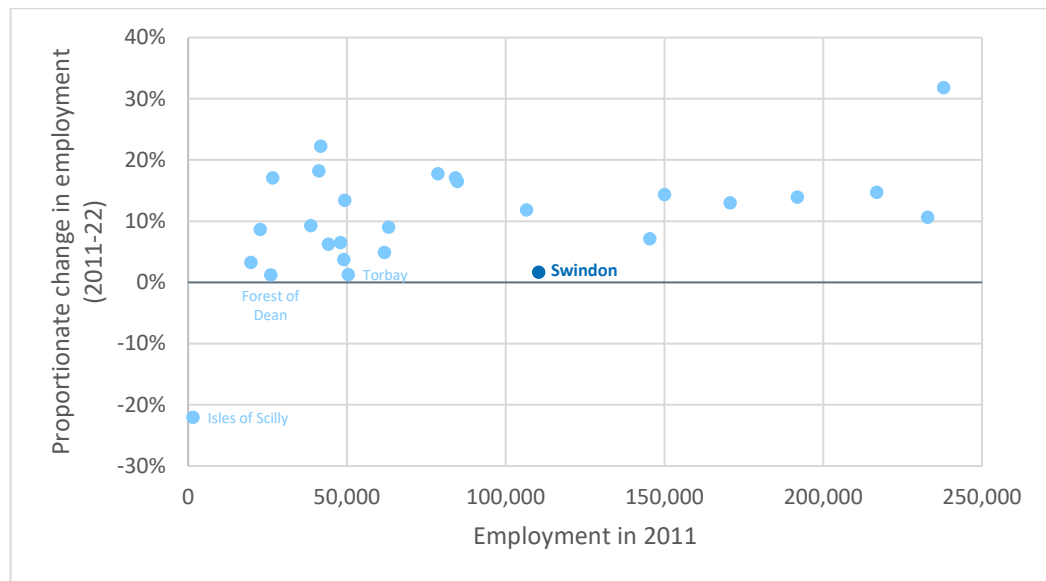
Source: Swindon Borough Council; Business Register and Employment Survey

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

Space intentionally left blank

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

Figure 2.7: Comparing Proportionate Employment Growth in the South West



Source: BRES; Turley analysis

Worsening affordability

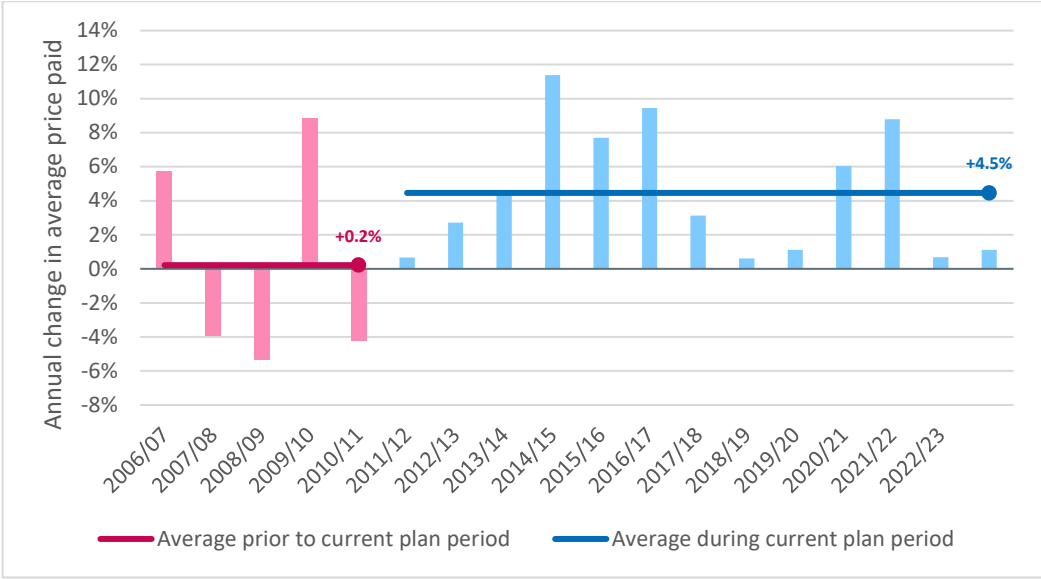
- 2.12 Failure to deliver planned housing growth in Swindon appears to have also put pressure on house prices, which are widely acknowledged to provide an indication of the balance between supply and demand¹⁴.
- 2.13 Data published by the Land Registry indicates that the average price paid for housing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

Space intentionally left blank

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

¹⁵ Land Registry (2025) Price paid data

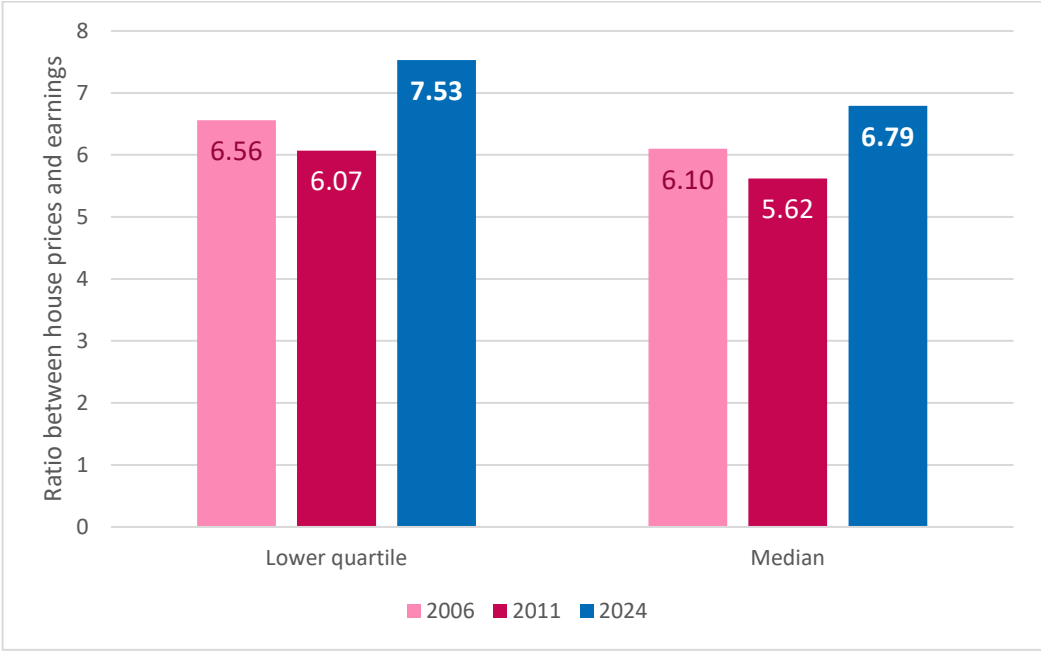
Figure 2.8: Annual Change in the Average Price Paid for Housing in Swindon



Source: Land Registry; Turley analysis

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

Figure 2.9: Lower Quartile and Median Affordability Ratios for Swindon

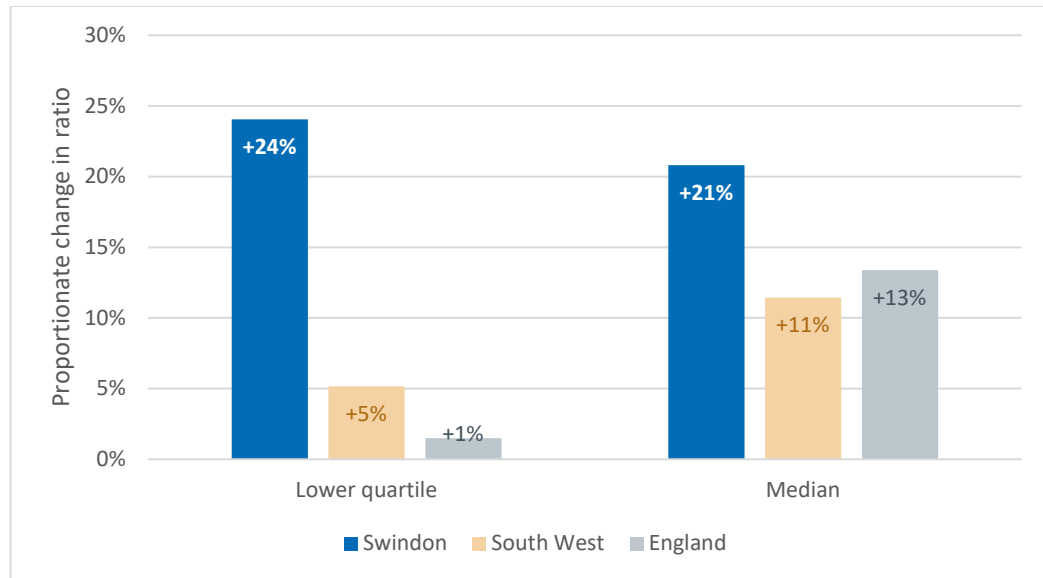


Source: ONS

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

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

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



Source: ONS

Few new affordable homes

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

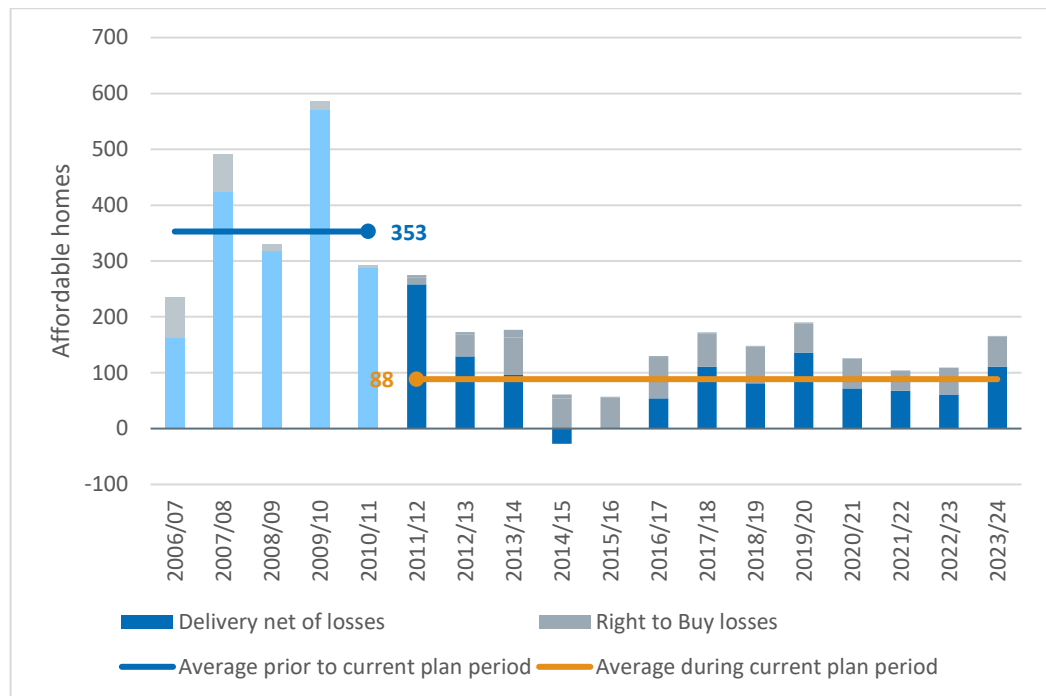
¹⁷ MHCLG (June 2024) Live Table 1008C: Total additional affordable dwellings provided by local authority area – completions

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

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

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

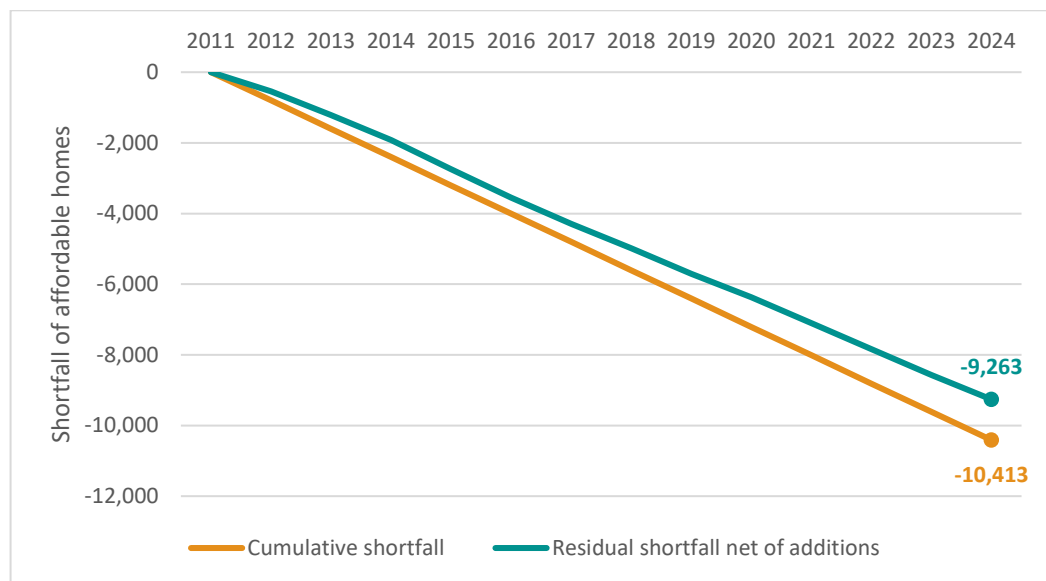
Figure 2.11: Affordable Housing Delivery and Losses through Right to Buy



Source: MHCLG

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

Figure 2.12: Cumulative Shortfall of Affordable Housing



Source: Swindon Borough Council; MHCLG; Turley analysis

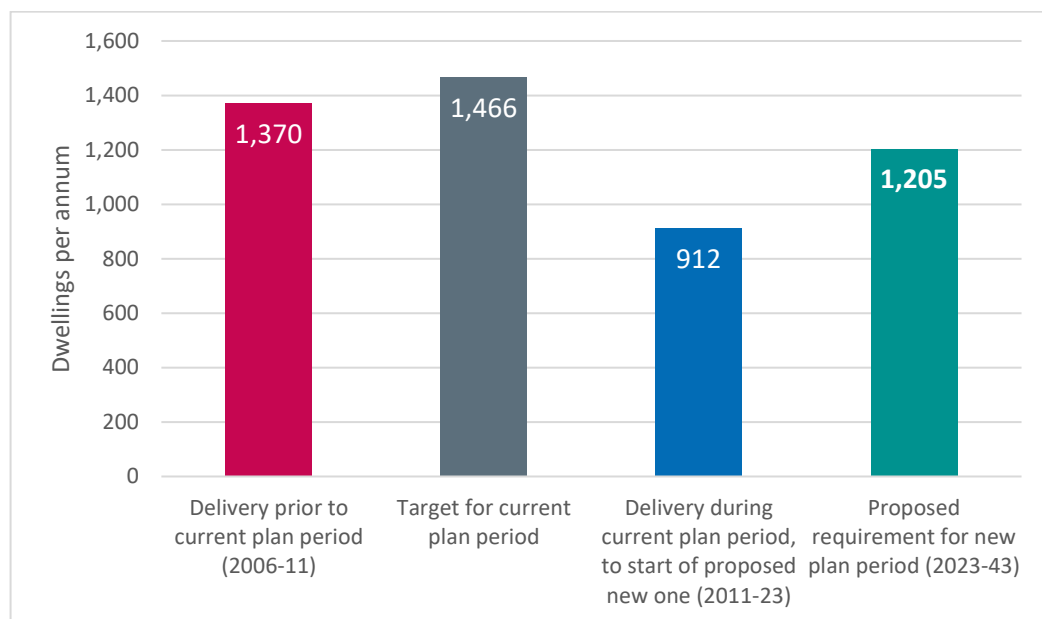
Summary

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

3. Introducing the Council's Proposed Approach

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

Figure 3.1: Benchmarking Proposed Housing Requirement



Source: Swindon Borough Council; MHCLG; Turley analysis

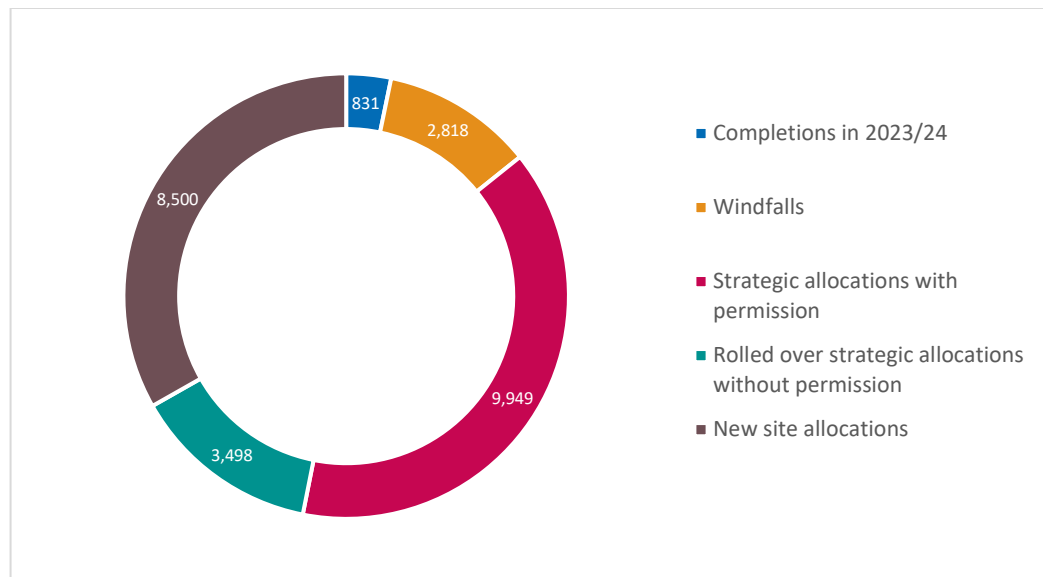
- 3.4 The Council assumes that existing planning permissions will meet more than half of the identified need, adding to homes that are known to have already been completed in the

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

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

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

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



Source: Swindon Borough Council

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

²³ *Ibid*, paragraph 6.5

²⁴ *Ibid*, paragraph 6.6 and Appendix 3

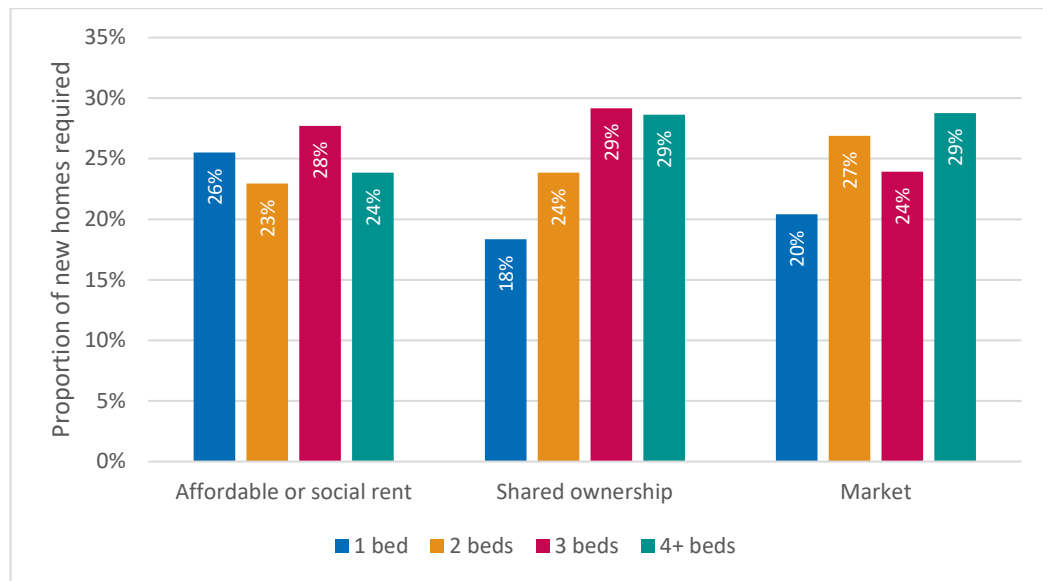
²⁵ *Ibid*, Appendix 3

²⁶ *Ibid*, p53

²⁷ *Ibid*, p52

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

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



Source: HDH Planning and Development

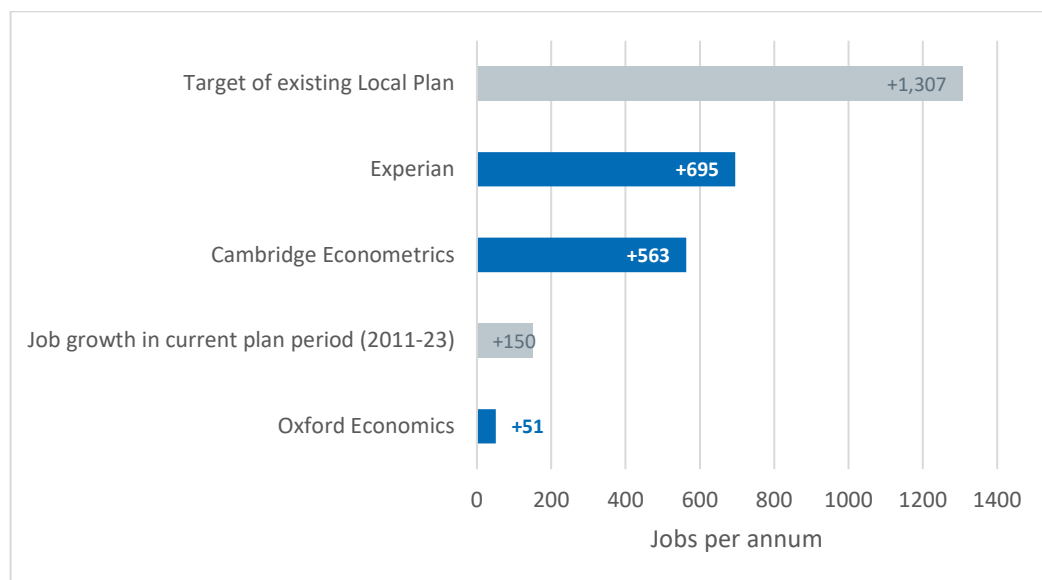
Summary

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

4. Economic Implications

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

Figure 4.1: Benchmarking Forecast Employment Growth in Swindon



Source: Turley analysis

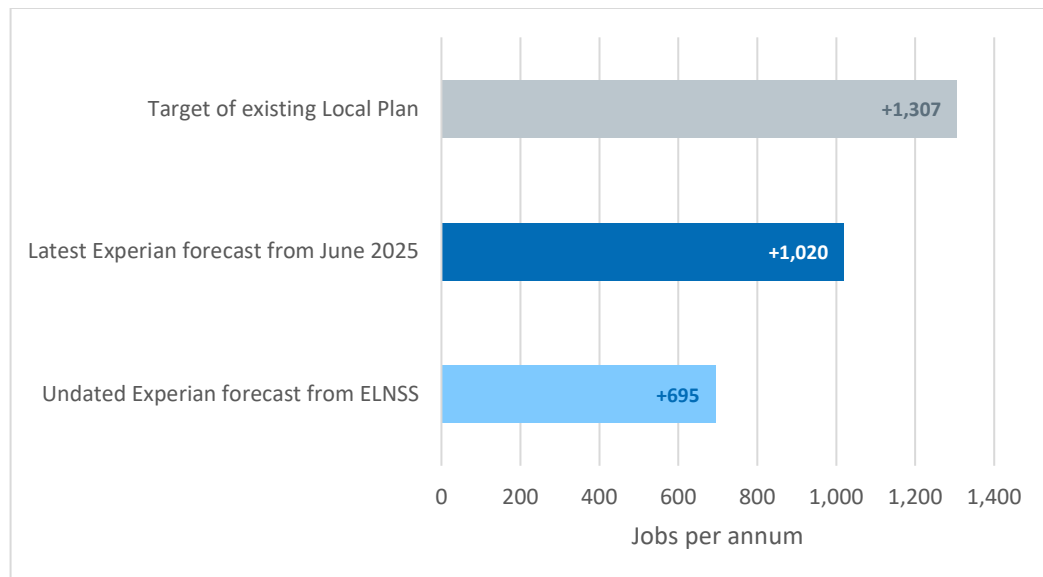
²⁹ Icen Projects (March 2025) Swindon Employment Needs and Land Supply Study, paragraph 1.52

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

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

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

Figure 4.2: Introducing the Most Recent Experian Forecast



Source: Experian; Swindon Borough Council

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

³² *Ibid*, p153

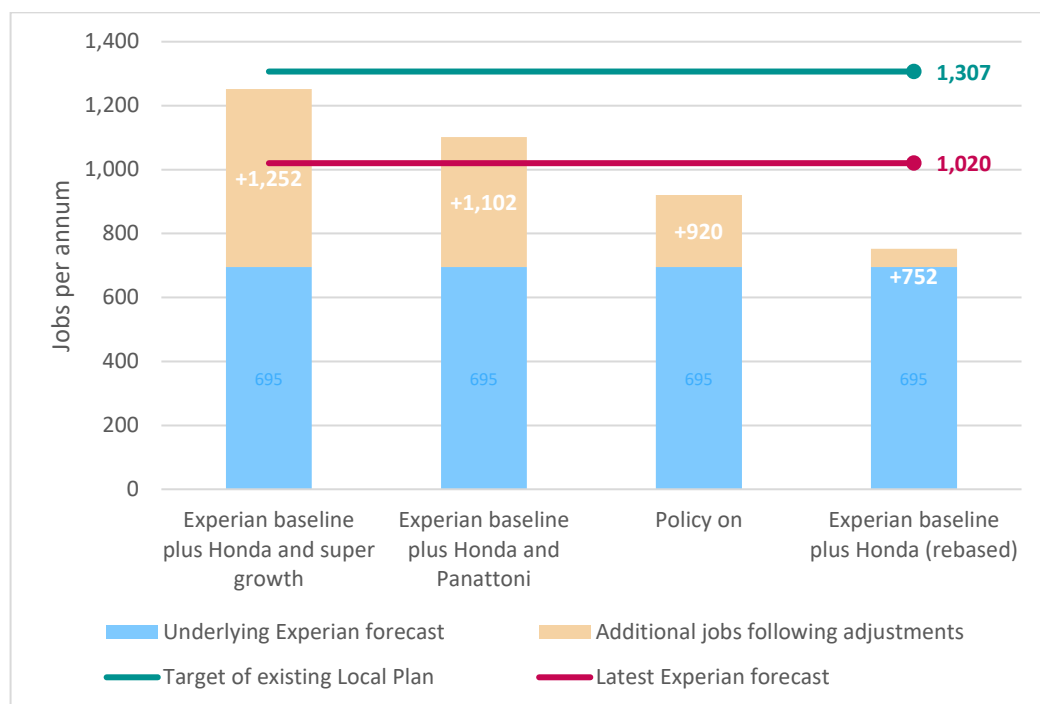
³³ *Ibid*, paragraph 10.21

³⁴ *Ibid*, p149

³⁵ *Ibid*, paragraph 10.26

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

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



Source: Icen Projects; Turley analysis

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

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

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

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

³⁷ *Ibid*, p73

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

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

Space intentionally left blank

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

³⁹ *Ibid*, p36

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

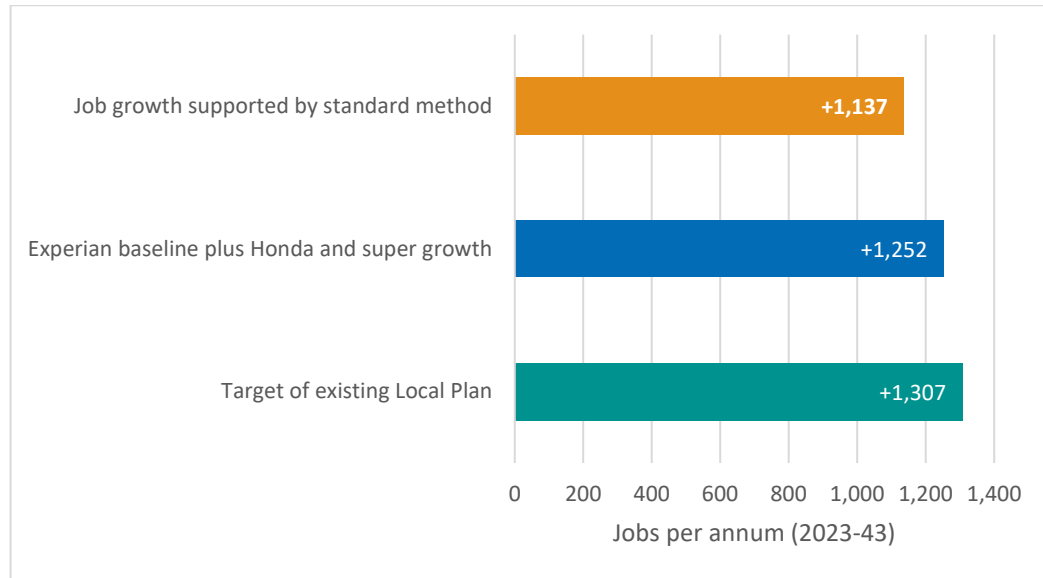
⁴¹ *Ibid*, p8

⁴² *Ibid*, p9

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

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

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



Source: Icen Projects; Turley analysis

Summary

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

5. Implications for Affordable Housing

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

Emerging Development Plan and Evidence Base

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

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

⁴⁵ Document reference 02.03

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

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

Affordable Housing Delivery to Date over the Plan Period

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

⁴⁶ $7,171 / 20 = 358.55$

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

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

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

Source: MHCLG; Turley analysis

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

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

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

Source: MHCLG; 2025 LHNA; Turley analysis

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

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

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

⁵⁰ 248 / 5 years = 49.6 + 359 = 408.6

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

Likely Housing Supply over the Plan Period

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

⁵¹ Document reference 03.08

⁵² Difference of 1 dwelling

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

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

Space left intentionally blank

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

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

Source: Swindon Borough Council; Turley analysis

*figures do not sum due to rounding

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

Projected Affordable Housing Supply over the Plan Period

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

⁵⁴ 30% of 8,499 = 2,545.5

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

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

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

Source: Swindon Borough Council; Turley analysis

*figures do not sum due to rounding

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

⁵⁵ 5,848 / 20 years = 292.4

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

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

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

Source: Swindon Borough Council; 2025 LHNA; Turley analysis

*figures do not sum due to rounding

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

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

Other Material Considerations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Summary

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

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

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

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

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

6. Summary and Conclusions

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Appendix 2: New Site Allocations Breakdown (Turley analysis)

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

Turley



Turley Office

[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]



Respondent No: 296

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title

Mrs

Q2. First Name

Jane

Q3. Last Name

Wilson

Q4. Job Title (where relevant)

not answered

Q5. Organisation (where relevant)

not answered

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[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. 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 SHELTA 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: 297

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Rachel

Q3. Last Name Danemann

Q4. Job Title (where relevant) Planning Manager

Q5. Organisation (where relevant) Home Builders Federation

[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: Late submission 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

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

SENT BY EMAIL

10/10/25

Dear Local Plans Team,

**HBF Response to Swindon Local Plan 2023 – 2043
Regulation 18 consultation draft**

1. Please find below the HBF response to the Swindon Local Plan 2023 - 2043 Regulation 18 consultation draft
2. HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.
3. We have not responded to all of the policies in the Plan only those of relevance to our members. HBF do not comment on individual sites, so have not responded to any settlement specific or site-specific questions. We have provided some broader comments on the settlement strategy and detailed comments on Development Management policies.

Plan Period

4. HBF considers that the Council should ensure that the Plan covers a period of at least 15 years from the adoption of the Plan. The NPPF states strategic policies should look ahead over a minimum 15-year period from adoption and that where larger scale developments form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.
5. In light of the time taken to prepare a Local Plan and take it through its statutory stages HBF would encourage the Council to consider whether the Plan period should be further extended. We note that the supporting evidence would need to reflect the full plan period.

Chapter 2: Vision and Strategic Objectives

6. HBF would suggest that the Vision for Swindon explicit about the need to plan for both open market and affordable housing. The Vision should be explicit in its commitment to meet housing needs in full. To help address the housing crisis, reflect national planning policy and to support the Councils' growth aspirations HBF considers that it is appropriate for the Council to identify the maintenance of the five-year supply in Swindon as an important objective for the Plan.

Chapter 4: The Spatial Strategy and Strategic Area Policies

Policy SS1: Swindon's Spatial Approach to Growth

7. HBF would suggest that the Policy SS1 should include an explicit number of new homes over the plan period, and a dwellings per annum figure, both expressed as a minimum housing requirement. The figure should be informed by the standard method, but HBF would argue even this figure could be higher to help address the housing crisis, support the Councils' growth aspirations and ensure affordable housing is delivered. A clear figure is needed for the monitoring of policy delivery, and to identify if and when interventions in the case of non-delivery of housing are needed. We suggest the housing requirement is important enough that it needs to be a strategic issues and should shape the spatial strategy, especially when the Council's own viability evidence suggest brownfield city centre sites are undeliverable, which calls into question the whole approach to growth being proposed in the Plan. Unviable site which deliver no housing will not led to growth.

Policy SS2: Settlement Hierarchy

8. HBF does not comment on individual sites, other than to say the Plan should provide for a wide range of deliverable and developable sites across the area in order to provide competition and choice to ensure that housing needs are met in full. HBF would wish to see the Plan set out a logical settlement hierarchy which meets all the housing needs and addresses all areas of the housing market, with a range of sites proposed for allocation. The soundness of strategic and non-strategic site allocations, whether brownfield or greenfield, will be tested in due course at the Local Plan Examination.
9. We are concerned that the Council's own viability evidence calls into question the deliverability of the proposed approach. There needs to be a joining together of the viability evidence and the spatial strategy. If the spatial strategy favours locations where sites are unviable, this will not deliver a sound plan that is positively prepared, justified or effective. It would seem additional greenfield sites will be needed meet the housing requirement is to be viable and deliverable.
10. The spatial strategy of the Plan should also recognise that there may be clusters of villages that provide a range of services for that area within reasonable travelling distance of each other, so villages may need to be grouped together. These areas might be able to sustainably support a substantial level of development but may not have all the services within one particular village.
11. Similarly, the Local Plan should recognise that settlements that currently do not have services could expand to include those services if new development is allocated in those areas. The current range of village services should not be used as a basis for only locating development close to existing services, it could in fact also identify where services could be improved through new development. Allocating housing sites in rural areas can also provide opportunities for small sites which are particularly helpful for SME builders.

Chapter 5: Sustainable High-Quality Development

SD1: Effective Use of Land

12. HBF note that some developers are experiencing challenges around delivery of BNG onsite and the implications this has for density. The Council need to be mindful of these issues and the possible tensions around design and density and the BNG hierarchy. BNG is providing particularly challenging on brownfield sites with open mosaic habitat, with the costs making many such sites undeliverable.

SD3: High-Quality Design

13. HBF does not support the introduction of the optional Nationally Described Space Standard though policies in individual Local Plans. If the Council wanted to do this they would need robust justifiable evidence to introduce the NDSS, as any policy which seeks to apply the optional nationally described space standards (NDSS) to all dwellings should only be done in accordance with the NPPF¹, which states that “policies may also make use of the NDSS where the need for an internal space standard can be justified”.
14. The NPPF² requires that all policies should be underpinned by relevant and up to date evidence, which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned. The PPG³ identifies the type of evidence required to introduce such a policy. It states that ‘where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:
 - i. Need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.
 - ii. Viability – the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.
 - iii. Timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions’.
15. HBF also remind the Council that there is a direct relationship between unit size, cost per square metre (sqm), selling price per sqm and affordability. The Council’s policy approach should recognise that customers have different budgets and aspirations. An inflexible policy approach to NDSS for all new dwellings will impact on affordability and effect customer choice. Well-designed dwellings below NDSS can provided a good,

¹ para 130f & Footnote 49

² Para 31

³ Ref needed

functional home. Smaller dwellings play a valuable role in meeting specific needs for both open market and affordable home ownership housing.

16. An inflexible policy approach imposing NDSS on all housing removes the most affordable homes and denies lower income households from being able to afford homeownership. The introduction of the NDSS for all dwellings may mean customers purchasing larger homes in floorspace but with bedrooms less suited to their housing needs with the unintended consequences of potentially increasing overcrowding and reducing the quality of their living environment. The Council should focus on good design and usable space to ensure that dwellings are fit for purpose rather than focusing on NDSS.
17. HBF considers that if the Government had expected all properties to be built to NDSS that they would have made these standards mandatory not optional.
18. If the proposed requirement for NDSS is carried forward, then the Council should put forward proposals for transitional arrangements. The land deals underpinning residential sites may have been secured prior to any proposed introduction of the NDSS. These sites should be allowed to move through the planning system before any proposed policy requirements are enforced. The NDSS should not be applied to any reserved matters applications or any outline or detailed approval prior to a specified date.
19. There is also a need for the Plan to be clear on how this policy links into the Local Nature Recovery Strategy (LNRS) Biodiversity Net Gain (BNG) and other environmental policies.

SD5: Tall Buildings

20. HBF observe that tall buildings tend to lend themselves to a particular type of living and appeal to certain groups. It will be important for the Plan as a whole to provide for a range of housing types including family housing. We are also finding that many housing associations are wary of taking on new affordable homes in tall buildings. HBF would observe that it is possible to deliver brownfield development as higher density single family homes housing and not only via tall buildings.
21. We also note that the Council's own viability assessment suggests the viability of city centre brownfield sites is problematic.

SD6: Villages and Development in the Countryside Villages

22. HBF does not comment on individual sites, other than to say the Plan should provide for a wide range of deliverable and developable sites across the area in order to provide competition and choice to ensure that housing needs are met in full. HBF would wish to see the Plan set out a logical settlement hierarchy which meets all the housing needs and addresses all areas of the housing market, with a range of sites proposed for allocation. The soundness of strategic and non-strategic site allocations, whether brownfield or greenfield, will be tested in due course at the Local Plan Examination.
23. The spatial strategy of the Plan should also recognise that there may be clusters of villages that provide a range of services for that area within reasonable travelling distance of each other, so villages may need to be grouped together. These areas might be able to sustainably support a substantial level of development but may not have all the services within one particular village.
24. Similarly, the Local Plan should recognise that settlements that currently do not have services could expand to include those services if new development is allocated in those areas. The current range of village services should not be used as a basis for only locating development close to existing services, it could in fact also identify where services could be improved through new development. Allocating housing sites in rural areas can also provide opportunities for small sites which are particularly helpful for SME builders.

Chapter 6: Place for People

SP2: Homes for the Community (Strategic Policy)

25. HBF suggest the identification of the Strategic Policies within the Plan could be clearer.
26. HBF do not support the wording of Criteria One, which seems to suggest that the delivery of the standard method housing requirement is conditional on meeting all the other policies in the Plan. In our view this would fail to meet the requirement for a positively prepared Plan. The Plan should be aiming to deliver against the standard method housing requirement or ideally going further.
27. We are particularly concerned that the viability assessment questions the deliverability of the strategy being proposed and suggest that more greenfield sites will be required if the delivery of the housing requirement is to be achieved.

28. Although HBF strongly supports the plan-led system and the certainty provided by allocating sites for housing, as opposed to relying on windfalls, it is still essential that sites allocated are deliverable and viable. Allocating unviable sites will create delays and uncertainty as each developer has to make individual site-specific viability arguments, or worse still not pursuing the sites in the first place.
29. We support the allocation of sites to meet the small sites requirements rather than a reliance on a windfall allowance,

HC1: Housing Tenures and Sizes

30. It will be important to ensure the mix and type of housing proposed on site allocations is tested for viability, and flexibility included within the policy where necessary to secure deliverability and viability of site(s).

HC2: Affordable Housing

31. It will be important to ensure the policy asks of 30% affordable of which 78% is social rent is robustly tested for viability, and flexibility needs to be included within the policy where necessary to secure deliverability and viability of site(s).

HC3: Accessible Housing

32. The Policy seeks to require standards above current building regulations in particular the introduction of M4(2) and M4(3) standards. The Council should be aware that such standards should only be included where there is clear and robust evidence for their introduction. The Planning Practice Guidance (PPG) identifies the type of evidence required to introduce such policies (Reference ID: 56-007-20150327). It is therefore incumbent on the Council to provide a local assessment evidencing the specific case for Swindon which justifies the inclusion of optional higher standards for accessible and adaptable homes in the Plan. This is also the case for internal space standards and water efficiency standards. HBF is keen to emphasise that these are not “nice to haves” but should only be introduced where they are fully justified by robust evidence and even then, they should only be introduced in accordance with the parameters set out in the PPG and not exceed these.

HC4: Specialist Housing

33. There is also a need to differentiate between Part a) and part b) of M4(3) technical standards. M43a sets out standards for wheelchair adaptable housing, where M43b relates to wheelchair accessible housing which can only be required on affordable housing where the Council has nomination rights. This part of the policy needs to be amended to recognise this distinction. The viability Assessment should also consider the cost implications resulting from any requirements for the provision of M43a and/or M43b requirements. HBF therefore request that the policy is amended so that it is applied flexibly. This issue should also be factored into the whole plan viability assessment as both M4(3)a and M4(3)b impact on viability, with M4(3)b being considerably more expensive.

HC7- Self and Custom Build Housing

34. HBF would caution that any policies for self-build and custom build-plots, will need to be carefully considered and based on the appropriate evidence. HBF does not consider that requiring a proportion of self and custom building on all new residential development schemes of more than a certain size is the correct approach. Instead, HBF advocates for self and custom-build policies that encourage self and custom-build development by setting out where it will be supported in principle or by allocating small and medium scale sites specifically for this purpose.
35. We consider it unlikely that the provision of self and custom build plots on new housing developments can be coordinated with the development of a wider and larger site. At any one time, there are often multiple contractors and large machinery operating on-site from both a practical and health and safety perspective, it is difficult to envisage the development of single plots by individuals operating alongside this construction activity.
36. HBF also notes that many self-builders would prefer not to be on a large residential development. Consequently, having vacant plots on development sites that may never come forward because of a lack of demand or suitability is clearly undesirable and would not accord with the NPPF's requirement to use development land efficiently (paragraph 129).

Next Steps and Ongoing Engagement

37. I trust that the Council will find these comments useful as it continues to progress its Local Plan. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house-building industry.

38. HBF would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours faithfully

[Redacted signature]

Rachel Danemann MRTPI CIHCM AssocRICS

Planning Manager – Local Plans (Midlands and South West)

Home Builders Federation

[Redacted contact details]

[Redacted contact details]



Respondent No: 298

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title Miss

Q2. First Name Tracey

Q3. Last Name Davis

Q4. Job Title (where relevant) Domestic Cleaner

Q5. Organisation (where relevant) Marlborough College

[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.

Relating to the Fields at the back of 5 Moore close Wroughton. Do not want to ruin are views as that why we bought our house 29 years ago because of our outlook and watching all of the wildlife, deers, foxes etc. Most of are garden's get floods when it rains so with having more house's built will cause more problems. Parking is a big issue can't get doctors appointments because of the population in Wichelstowe

Q13. Please set out the changes you consider are needed. It will 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: 299

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Sam

Q3. Last Name Woodhead

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.

Hello there, I have read the response that Wroughton and Wichelstowe Parish Council have sent to you and would like to echo this feedback. There has been so much new housing here in my lifetime and Wichelstowe hasn't even been finished yet. The volume of new homes being proposed for Wroughton is crazy. Local services and amenities can't handle this level of further development. I can't get a doctors appointment for weeks, the roads are falling apart and I can't get an NHS dentist. Surrounding green areas are built on every year. Ridgeway Park and The Grange are the latest new ones. Before that it was Badgers Brook and Nursery Close. Planning for the Old Co-op site and Haskins car park won't be long. Wroughton's semi rural and unique character is under threat. The Local Plan needs to be revisited with the new homes for Wroughton slashed to a third of what is currently proposed.

Q13. Please set out the changes you consider are needed. It will 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: 300

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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

I am writing to you as a Wroughtonian of 81 years having lived in Salthrop and Wroughton all my life. My parents and my grandparents also lived in Wroughton all their lives. No more building in Wroughton and outlying districts until we have all the relevant infrastructure in place. Schools are nearly full to maximum, the surgery is nowhere big enough, the roads and pavements are a disgrace, drains and sewers cannot cope – sewer lids lift two feet in the air with mess all over the area as you go into Maunsell Way in Wroughton. Since I moved to Wroughton in 1988, we have lost two banks, two garages, two DIY shops, one clothes and shoe shop, two greengrocers and one butcher shop but plenty of properties have been built. We have not got anything now – only empty shops compared to what Royal Wootton Bassett and Marlborough have. I feel really let down as well as a lot of local people do with both councils. They don't seem to listen to the public. It seems to me that councillors want to go with the Government's policy and turn our lovely country into a slab of concrete.

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

not answered



Respondent No: 301

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title

Mr

Q2. First Name

Graham

Q3. Last Name

Seeley

Q4. Job Title (where relevant)

not answered

Q5. Organisation (where relevant)

not answered

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[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. 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 SHELTA 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: 302

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Elliott

Q3. Last Name Woodhead

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.

Dear Sir I would like to fully support the response to the Local Plan which Wroughton and Wichelstowe Parish Council have sent to you. The document collates many of the concerns and issues raised by residents. The volume of new residences being proposed for Wroughton is unsustainable and unreasonable. Local services and roads are struggling to cope with current levels. Our NHS doctor provision is very poor as so many are sharing this resource from Wichelstowe and surrounding villages. Our roads are potholed and being dug up on a regular basis. Temporary traffic light remain on Brimble Hill due to a legal dispute involving SBC. The bridge over the M4 from Croft Road, the main route into central Swindon, is unsuitable of two lanes of traffic due to engineering issues yet more homes are being added. Really? I urge SBC to reconsider these ludicrous proposals

Q13. Please set out the changes you consider are needed. It will 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: 303

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Q1. Title

Mrs

Q2. First Name

Caroline

Q3. Last Name

Paige

Q4. Job Title (where relevant)

not answered

Q5. Organisation (where relevant)

not answered

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[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. 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 SHELTA 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: 304

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title

Mr

Q2. First Name

Terry

Q3. Last Name

Cook

Q4. Job Title (where relevant)

Retired

Q5. Organisation (where relevant)

not answered

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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

I am opposed to the proposal to build 1031 new homes in Wroughton, due to the lack of increase in the infrastructure in Wroughton which is already under strain.

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

Cancel Wroughton plan altogether or massively reduce the number of home to be built.



Respondent No: 305

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- Q1. Title Mrs
- Q2. First Name Peggy
- Q3. Last Name Allen
- 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.

Wroughton is a village why would you want to change this? Why are you not willing to use brown sites as opposed to green site which we have. If you need to build so many new houses why not build a new town e.g. Tadpole

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

Are these new houses going to be used to house those on SBC Housing Waiting List? There needs to be provision for health services & schools & waste services which the current amount cannot supply. We are fed up with not being able to get GP appointments & being palmed off to GWH which is not able to cope either



Respondent No: 306

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Title not answered

Q2. First Name Will

Q3. Last Name Dale

Q4. Job Title (where relevant) not answered

Q5. Organisation (where relevant) Knight Frank on behalf of Barker Family Trust

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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

SBC admin note: Please see attached response.

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

SBC admin note: Please see attached response.

Swindon Local Plan Regulation 18 Consultation

Lower Burytown Farm

Prepared on behalf of Landowners - Barker Family

07 October 2025

Confidential

KF Ref: 1188

Contents

1.	Introduction	3
2.	Main Representations - Draft Local Plan	4
3.	Evidence Base	11

1. Introduction

- 1.1 This representation is submitted on behalf of the landowners in support of the inclusion of Lower Burytown Farm as a proposed Strategic Growth Location within the emerging Swindon Borough Local Plan. The site is being introduced as a strategic growth location and concept through this consultation, with the intention of establishing its potential to contribute meaningfully to the Borough's long-term growth strategy.
- 1.2 Lower Burytown Farm (SHELAA Site ID S0500) extends to approximately 426 hectares of predominantly agricultural land on the north-eastern edge of Swindon, located between Broad Blunsdon and Hannington. The site benefits from strong strategic accessibility, with direct links to the A419 and convenient access to the M4 motorway and Swindon Railway Station, offering excellent regional connectivity to Bristol, Reading, and London. The location provides a natural opportunity for a carefully planned urban extension or new settlement that can integrate with existing transport corridors while protecting and enhancing the rural character of surrounding communities.
- 1.3 The accompanying Vision Document sets out an initial concept for a sustainable, mixed-use community of around 4,000 homes, guided by garden village principles. The emerging masterplan is landscape-led, respecting the area's heritage assets, ecological value, and topography, while establishing a distinctive sense of place. The concept envisages a diverse mix of homes (including affordable and specialist housing), supported by new schools, local centres, green and blue infrastructure, community facilities, and active travel routes, all structured around a walkable, 15-minute neighbourhood framework. The proposal would deliver a resilient, adaptable, and well-connected community that supports Swindon's long-term housing, economic, and sustainability objectives.
- 1.4 As this is the first stage of promoting the site as a strategic concept, the landowners are keen to work collaboratively with Swindon Borough Council, adjoining authorities, infrastructure providers, and local stakeholders to explore the opportunity in more detail. This engagement will be essential in refining the spatial concept, testing deliverability, and ensuring alignment with wider infrastructure and environmental strategies. The intention is to develop the concept into a comprehensive and evidence-based proposal that can inform future iterations of the Local Plan and its supporting evidence base.
- 1.5 The proposal represents a significant long-term growth opportunity for Swindon Borough, offering the scale and flexibility to deliver new homes, employment land, and supporting infrastructure in a coordinated way. Strategic developments of this kind can play a vital role in addressing both local and cross-boundary housing needs, supporting economic growth, and enabling strategic infrastructure investment. In this context, the emerging concept at Lower Burytown Farm could help to broaden Swindon's growth strategy, providing a balanced and deliverable complement to other strategic locations in the Borough.
- 1.6 This representation is supported by a suite of technical and environmental assessments, which provide an early understanding of the site's opportunities and constraints:
 - Vision Document (S+C Architects, October 2025)
 - Ecology Position Note (EDP, January 2024)
 - Landscape and Visual Considerations (EDP, January 2024)
 - Archaeology and Heritage Appraisal (EDP, April 2024)
 - Arboricultural Review (EDP, November 2023)
- 1.7 A completed Representation Form is provided at **Appendix A**.
- 1.8 Looking ahead, the landowners are committed to working proactively with Swindon Borough Council, infrastructure providers, and other technical and community stakeholders to explore the Lower Burytown Farm opportunity in greater detail.
- 1.9 The next stage of work will focus on the more detailed preparation of a Masterplan, which will define the site's spatial structure, phasing, and infrastructure requirements in alignment with the Borough's wider growth strategy. This process will be underpinned by further technical studies, including detailed transport and utilities assessments, further environmental and landscape evaluation, and engagement with local communities to shape a shared vision for a sustainable and inclusive new community. Through this collaborative approach, the intention is to develop a robust, evidence-based proposal that can inform future iterations of the Local Plan and provide a clear, deliverable pathway for long-term growth at the north-eastern edge of Swindon. The landowners would support future detailed work with the endorsement of Swindon Borough Council on the strategic growth location.

2. Main Representations - Draft Local Plan

Chapter 2 – Vision

- 2.1 The vision is set out on the basis of three overarching missions, including building a fairer, better and greener Swindon. The goals and objectives are generally welcome and provide a robust framework for the plan.
- 2.2 The plan period 2023-2043 represents a 20-year period, with a plan period from adoption (expected in December 2027) of 16 years. There is a risk of the adoption slipping until 2028, whereby the plan period from adoption reduces to 15 years, which is the minimum as outlined in para 22 NPPF.
- 2.3 In light of the scale of the larger site allocations coinciding with para 22 NPPF in that these can be defined as “significant extensions to existing villages and towns”, the limited plan period is not considered to be justified and should be extended to align with the council’s long term vision for Swindon Borough, which is set for a 30 year period (up to 2055).
- 2.4 Furthermore, with the local plan adoption in 2027, or indeed 2028 subject to any delay in the process, the plan period effectively begins five years ahead of adoption. The Standard Method includes adjustments to reflect delivery (over and/or undersupply) from previous years in line with the intent to look forward.
- 2.5 However, according to Paragraph: 008 Reference ID: 2a-008-20241212 NPPG, the plan period should only commence at minimum two years prior to submitting the plan for examination (2024), therefore the beginning of the plan period should be set accordingly. Extending the Local Plan period is essential to accommodate large-scale growth, as it provides the time and certainty needed to plan and deliver complex, infrastructure-led developments. A longer timeframe ensures that strategic sites can contribute fully to meeting housing and employment needs while allowing for phased delivery, infrastructure coordination, and place-making over the long term.
- 2.6 Whilst Point III of Build a Better Swindon notes the need for housing growth, the vision does not address how the housing requirement for the whole area, including the wider housing need (needs that cannot be met within neighbouring areas), can be met, or will be sought to be met, over the plan period, as per para 69 of the National Planning Policy Framework 2024 (NPPF).

Chapter 4 - Policy SS1: Swindon’s Spatial Approach to Growth

- 2.7 The spatial strategy supports a) growth in the urban area, b) industrial locations (employment) and c) in strategic growth locations including the New Eastern Villages, Wichelstowe, Kingsdown, East Wroughton and North Tadpole.
- 2.8 A further area of growth may include development in larger villages, small villages and hamlets.
- 2.9 Strategy a) appears to focus on urban regeneration and previously developed land, strategic growth locations predominantly focus on previously adopted allocations with the exception of East Wroughton.
- 2.10 Informative text in relation to the quantum of development for each part of the strategy, including the housing and employment requirement, appears to be missing, with overarching figures noted in the supporting text in Chapter 6.
- 2.11 Based on the Local Housing Needs Overall Housing Need Update Annex (August 2025), the Standard Method figure of 1,196 dwellings per annum (dpa) would require Swindon to plan for 23,920 households, whilst the draft Local Plan refers to 1,205 dpa at 24,100 homes over 20 years. Due consideration should be given to the comments previously made regarding the plan period and the impact this might have on the overall housing requirement across the plan period.
- 2.12 It is strongly recommended, for transparency, to provide clarification on the updated housing requirement and include the requisite supporting text for the overarching housing and employment requirements as well as the strategy specific approach, denoting the quantum of development to be supplied with each strategic approach.
- 2.13 Notwithstanding the above, para 78 NPPF further notes that the “*supply of specific deliverable sites should in addition include a buffer*” of 5% to ensure choice and competition. The housing requirement (24,100 units) with a 5% buffer would equate to 25,305 units.
- 2.14 It is understood that Swindon Borough Council forms its own HMA which extends into north east Wiltshire and into Vale of White Horse (VoWH) and Cotswold District Council (CDC). Based on para 1.19 LHN Assessment (October 2024), data indicates that commuting synergies exist mainly between Swindon and Wiltshire, VoWH and CDC, as well as some commute to West Oxfordshire.

- 2.15 A Statement of Common Ground with Wiltshire Council has been agreed (December 2024) in support of the Wiltshire Local Plan Review. It is expected that SBC will provide an updated SoCG with all relevant councils within the HMA, including Wiltshire, VoWH and CDC, to support its emerging local plan.
- 2.16 S20(5)(c) of the 2004 Act requires that the Local Plan examination determine whether the Duty to Co-operate has been complied with. The key aspects to test in this regard based on the legislation are whether the LPA has maximised the effectiveness of plan-making activities by engaging constructively, actively and on an on-going basis in the preparation of local plans in the context of strategic matters having a significant impact on at least two planning areas. It is anticipated that strategic conversations should have been ongoing with neighbouring authorities and all required statutory bodies. The Council should consider their evidence base and the reporting of this engagement carefully, particularly owing to the important of legal compliance as part of the plan process.
- 2.17 The NPPF refers to setting out strategic priorities (paragraph 156) and public bodies have a duty to cooperate on planning issues that cross administrative boundaries (paragraph 178). Furthermore, joint working should enable LPAs to meet development requirements which cannot wholly be met within their own areas (paragraph 179). They will be expected to demonstrate evidence of having effectively cooperated when plans are submitted for examination (paragraph 181).
- 2.18 The PPG on the Duty to cooperate (ID9) provides detailed guidance and regard should be given to it in full. Its aim is that co-operation should produce effective and deliverable policies on strategic cross-boundary matters (ID9-00120140306). Other main points are that there is not a duty to agree (paragraph 003) and that co-operation should take place throughout plan preparation (paragraph 012). It is especially important to note that as the duty applies to the preparation of local plans a failure to comply cannot be corrected after submission and in those circumstances an Inspector will not be able to recommend that the plan is adopted (ID9-018-20140306).

Strategic Growth Locations and Urban Regeneration Areas

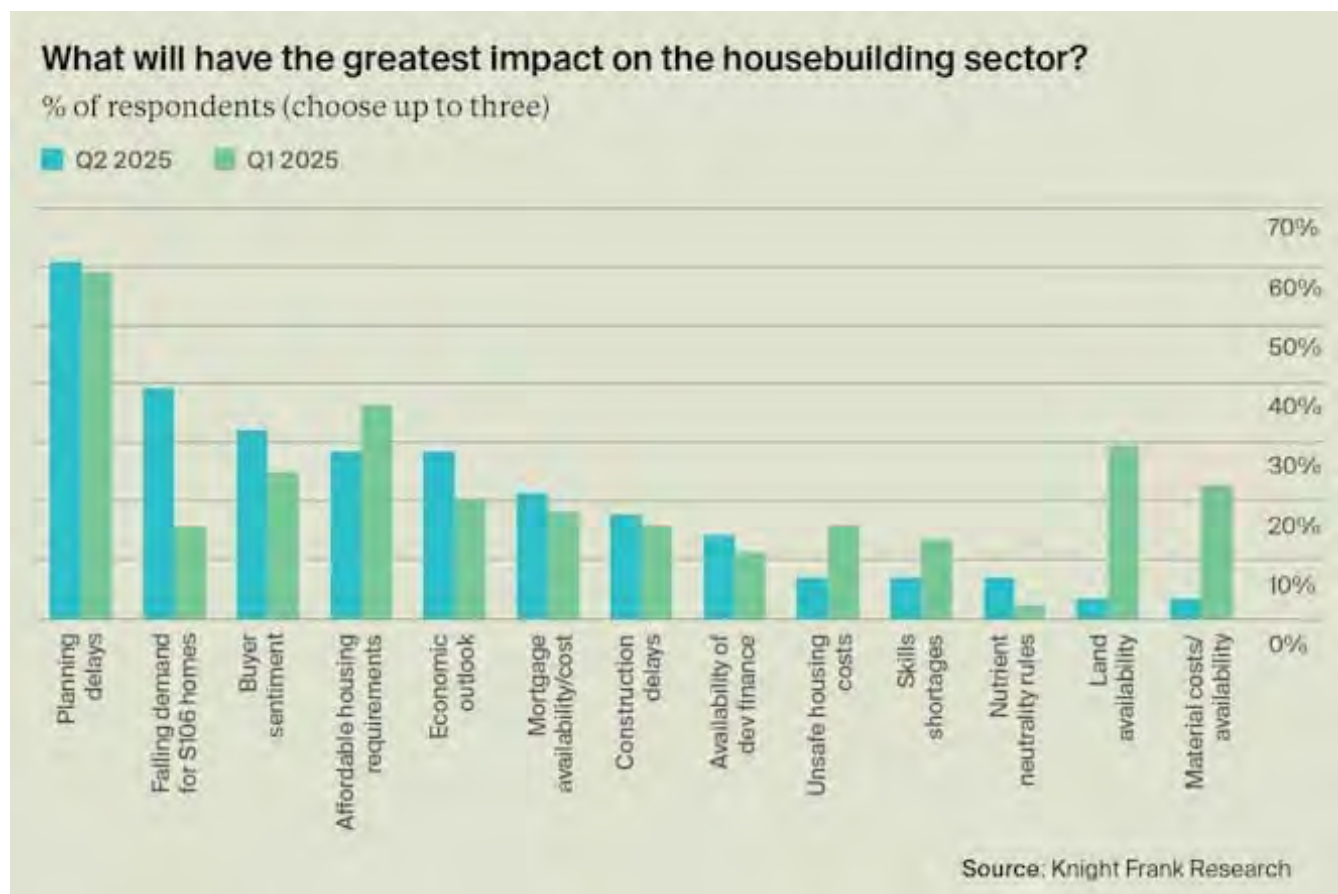
- 2.19 The policies within this section set out a potential supply of 21,158 homes. However, based on the Housing Trajectory (Authority Monitoring Report 2024-2025), strategic sites would only deliver 14,076 units up to 2041/42, with windfall sites contributing at 2,397 units for a total of 16,473 units.
- 2.20 In addition to the completions in 2023/2024 (831 and 892 units), the supply would equate to 18,196 units with a shortfall of 5,904 units. The completions shown in the Authority Monitoring Report 2024-2025 for years 2023/24 and 2024/25 also differ from the housing trajectory shown at Appendix 3 of the SBC Local Plan 2023-2043 consultation document.
- 2.21 The combined housing yield from the allocated sites SGL01-06 and UGA01 & 02 is stated to equate to 21,158 units, albeit it is unclear on how many of these units have either been completed prior to this plan period or how many units will fall beyond the plan period to 2043.

Policy	Site Name	Yield
SGL 01	Swindon Central	4,347
SGL 02	New Eastern Villages	10,000
SGL 03	Kingsdown	1,847
SGL 04	Wichelstowe	1,600
SGL 05	East Wroughton	1,031
SGL 06	North Tadpole	513
UGA 01	Marlowe Avenue	976
UGA 02	Pipers Way	844
Total		21,158

- 2.22 Based on the supporting text (Page 61), it is understood that the housing requirement will be met by the following:
- A. Net completions 2023/24: 831
 - B. Granted planning permissions: 12,767
 - C. Previous site allocations: 3,498
 - D. New site allocations: 8,344

- E. Small sites (below 1ha): 317
- F. Potential small sites (below 1ha): Call for Sites to be undertaken

- 2.23 Based on the aforementioned, the council notes a housing land supply of 25,757 units, which is ca 1,600 units above the total requirement of 24,100.
- 2.24 The plan currently lacks detail to demonstrate that the needs can be met within the plan period. It is of particular concern that the AMR shows a clear decline in delivery rates by 2040/41, with no sites contributing to the delivery in the last part of the plan period. Further evidence is expected to demonstrate the deliverability of each site. There is a concern that the complexity and potential viability issues of urban regeneration sites will lead to significant delays to site delivery, or even risk sites not being delivered at all.
- 2.25 An independent study undertaken by Knight Frank Research, as shown in the following Graphic 1, shows that a number of issues have had impacts on the housebuilding sector and therefore site deliverability. This includes matters related to the provision of affordable housing such as a failing demand for S106 homes (housing associations not bidding for affordable housing units) and the affordable housing requirements.
- 2.26 In particular, the issue of urban areas underproviding affordable housing due to viability issues remains, whereas greenfield sites, such as the site on land at Lower Burytown Farm, would have stronger prospects of delivering a wider range of tenure and housing mix, including more affordable housing units.



Graphic 1 Impacts on the housebuilding sector

- 2.27 Knight Frank Research concluded that greenfield sites with strong transport connections and clear local demand remain the most attractive, with the increased potential of higher affordable housing provision with partnership approaches or grant funding options to enable more effective delivery.
- 2.28 Therefore, additional Strategic Growth Locations such as the site on land at Lower Burytown Farm, should be considered for inclusion in the local plan to ensure a robust and consistent supply can be provided throughout the plan period, particularly the middle and later part, and to avoid slow delivery rates leading to a lack in consistent and sufficient supply throughout the plan period.

- 2.29 Furthermore, sufficient transparency should be provided to avoid the risk of double-counting. For example, sites that were granted planning permission should not be counted again as site allocations. Equally, clarity should be provided for sites that have outline planning permission to avoid double counting upon reserved matters permission being issued.
- 2.30 The housing trajectory (Appendix 3) of the Local Plan identifies capacity for approximately 25,796 dwellings over the plan period (2023/24–2043/44), combining existing commitments, windfall permissions, strategic allocations, and new site allocations. While this demonstrates an intention to meet the area’s housing requirements, the delivery profile reveals a number of critical challenges, particularly around phasing, deliverability, and long-term supply resilience, which a new strategic-scale settlement could help to address. A key component and compounding issue in this regard is the reliance placed on regeneration areas.
- 2.31 In the early years (2023–2027), housing delivery relies almost entirely on existing commitments and extant permissions. Delivery then falls sharply in Year 5 (2027/28), before new allocations begin to contribute meaningfully from 2028/29. This transitional dip presents a risk to maintaining a rolling five-year supply and could undermine the authority’s ability to demonstrate continuous delivery in the short to medium term. This would be particularly the case if there continues to be delays with the building out of existing permissions.
- 2.32 From 2028 onwards, the trajectory assumes a rapid escalation in completions, peaking at over 2,000 dwellings per annum between 2030 and 2034. While this ambition is welcome, it appears optimistic given the scale, infrastructure demands, and lead-in times typically associated with large strategic sites and Swindon’s previous history of housing delivery. Sustaining such delivery levels would require multiple major developments to progress concurrently and at pace, something rarely achieved without a coordinated spatial and infrastructure strategy.
- 2.33 In the later years (post-2036), housing delivery declines steeply, falling to just 200 by the end of the plan period. This suggests that identified supply tails off sharply, leaving the plan without sufficient long-term resilience or a pipeline of strategic growth opportunities beyond 2040. As currently presented, the trajectory does not provide a stable or continuous framework for housing delivery throughout the full plan period. It is important that the Council provides greater transparency in its housing trajectory by clearly identifying the expected delivery contribution from each of the strategic growth locations. Given the scale and complexity of these sites, their phasing, infrastructure delivery, lead-in times, and anticipated build-out rates will have a critical influence on the overall housing supply profile across the plan period. Disaggregating the trajectory to show the timing and quantum of delivery from each strategic location would enable a clearer understanding of how, when, and where housing needs are expected to be met. This level of detail is essential to demonstrate that the strategy is both spatially and temporally coherent, and that the identified allocations can realistically deliver the required number of homes in accordance with infrastructure and market capacity.
- 2.34 Against this context, the proposed new settlement at Lower Burytown Farm provides a credible and deliverable solution to several of the issues identified in the trajectory:
- It can strengthen medium- to long-term supply, helping to sustain delivery beyond 2036 as other allocations build out and windfall opportunities diminish.
 - Its phased delivery and masterplanned approach enable early infrastructure investment, supporting the transition between existing commitments and later strategic sites.
 - The scale and flexibility of the proposal allow for a balanced and resilient housing pipeline, capable of responding to changing market conditions and maintaining delivery continuity across plan periods.
 - By integrating employment land, community facilities, and sustainable transport infrastructure, the new settlement would contribute not only to housing supply but also to the creation of a self-sustaining, well-connected community aligned with national policy objectives for new towns and garden communities.
- 2.35 The current housing trajectory identifies the quantum of growth required, it lacks the spatial and temporal coherence necessary to ensure that housing needs will be met consistently throughout the plan period and beyond. The inclusion of the proposed new settlement at Lower Burytown Farm within the Local Plan would address these weaknesses by providing a long-term, infrastructure-led growth location, capable of supporting sustained delivery, accelerating housing supply, and underpinning a robust and flexible housing strategy over an extended plan horizon.

Strategic Policy Commentary

- 2.36 In its current form, many of the strategic policies provide a strong strategic vision but lack the clarity and delivery detail necessary to demonstrate how the proposed level of growth will realistically be achieved over the plan period. To ensure the policies are sound, effective, and consistent with the NPPF and PPG, several changes are required. These include providing greater spatial definition of the individual sites within the specific areas, clearer phasing and delivery information to support the housing trajectory, and a more robust infrastructure delivery

framework that identifies how and when supporting transport, social, and green infrastructure will be delivered. Strengthening these aspects will ensure that the policy provides a clear, coordinated, and deliverable framework for housing delivery, aligned with the NPPF's requirements for justified and effective plan-making.

- 2.37 A review of the Swindon Central Area Policy SGL 01 is provided below to give context to how the Council should be considering such areas to align with the NPPF and PPG Guidance to ensure the spatial strategy and approach to development is clear and sound. Such an approach may also be sensible for other strategic policies in the plan.
- 2.38 Policy SGL 01 establishes a clear strategic ambition for Swindon's Central Area as a major focus for regeneration and mixed-use growth, accommodating up to 8,000 new homes and 6,000 new jobs. This vision aligns with the NPPF's objectives for promoting sustainable urban growth, brownfield regeneration, and compact, well-connected communities. However, while the intent is supported, the policy lacks the level of spatial, temporal, and delivery detail necessary to demonstrate that this quantum of development is both realistic and deliverable within the plan period, as required by NPPF paragraphs 16, 35, 68, and 73, and the associated Plan-Making PPG.
- 2.39 The policy currently groups a number of distinct sites and regeneration opportunities under one strategic umbrella, but it does not disaggregate these into identifiable parcels with defined boundaries, capacities, or indicative delivery timescales. Whilst the site allocations part of the plan provides some detail, without this level of clarity, it is not possible to determine the contribution that each component site will make to the overall housing trajectory, nor to assess their respective infrastructure requirements, dependencies, or lead-in periods. This creates a risk that the assumed delivery from the Central Area may be overstated or backloaded to the latter part of the plan period, undermining confidence in the trajectory and the plan's overall soundness.
- 2.40 Furthermore, the policy provides only limited reference to infrastructure provision and phasing, offering general aspirations for improved connectivity and green infrastructure without identifying specific projects, costs, or delivery mechanisms. In line with NPPF paragraph 34, strategic policies should be supported by details setting out how and when required transport, social, and environmental infrastructure will be delivered. The absence of such evidence weakens the effectiveness of the policy and raises questions about viability and deliverability at examination.
- 2.41 To ensure the policy meets the tests of soundness, it is recommended that the Council:
- Disaggregates the Central Area into distinct sub-areas or development parcels, each with indicative capacities, boundaries, and expected delivery trajectories;
 - Links these sub-areas to a clear infrastructure delivery framework, identifying necessary investments, phasing, and delivery responsibilities; and
 - Provides clear monitoring indicators to measure progress and maintain flexibility over time.
- 2.42 These refinements would ensure that Policy SGL 01 is fully consistent with national policy, providing the spatial and temporal coherence required to demonstrate a deliverable and justified strategy for the regeneration of Swindon's Central Area.

Chapter 5: Policy SP1: Sustainable Development

- 2.43 The proposed development at Lower Burytown Farm is designed in accordance with garden city principles as well as ensuring a mix of uses is available within a 15-minute walk to encourage modal shift to non-vehicular modes of transport and support of healthy lifestyles, which aligns with the intentions of Policy SP1.
- 2.44 Whilst the policy is welcome in principle, the wording should be clarified further. The policy states that "all proposals for new development must be sustainable", which is indicated by way of making effective use of land, integrating well into existing routes and connections and being designed to a high quality.
- 2.45 However, the scope of the policy does not fully encompass the definition of sustainability, which is understood as development that meets the needs of the present without compromising the ability of future generations to meet their own needs. With reference to the NPPF, this would include matters such as social, environmental and economic sustainability.
- 2.46 Whilst these matters are dealt with in some detail in further policies, clarity on how development should meet the test of sustainability should be provided to enable a robust assessment of planning applications against Policy SP1.

Policy SD1: Effective use of Land

- 2.47 The policy is supported in principle, and it is expected that no specific density thresholds will be included in further iterations of the plan as this could potentially risk the deliverability of sites or conflict with other matters (i.e. heritage, landscape). Subsection 3 b and c should be renumbered to a and b for ease.

Policy SD2: Mixed Use Developments

- 2.48 The policy is supported in principle. The site on land at Lower Burytown Farm is proposed as a mixed-use, large-scale development which will inherently reduce the need for future residents to travel beyond the development due to the provision of necessary complementary uses within a walkable distance.

Chapter 6 - Policy SP2: Homes for the Community

- 2.49 The council's housing requirement equates to 24,100 homes over the plan period.
- 2.50 The policy encourages and supports mixed-use development in the Central area and seeks a 30% provision of affordable housing from major development proposals.
- 2.51 As aforementioned in relation to Chapter 4, further evidence is required to demonstrate the deliverability of the housing supply over the course of the plan period. The AMR raises concerns over the projected trajectory, particularly towards the middle and end of the plan period.
- 2.52 Subsection 2 should include reference to the Strategic Growth Locations, particularly supporting mixed-use development as these are considered to have more potential for inherent sustainable development due to their semi-autonomous nature and reduced interdependence on existing built-up areas.

Policy HC2: Affordable Housing

- 2.53 It is noted that the policy does not refer to the potential for reduced provision of affordable housing should the development become unviable. It is anticipated that, in particular development on previously developed land, will be contrary to policy HC2 in that the 30% affordable homes threshold is unachievable due to viability.
- 2.54 The Council will however be required to meet the need for affordable housing. It should be considered that greenfield sites offer stronger potential to deliver a higher provision of affordable housing, therefore sites such as Lower Burytown Farm should be included as a strategic development site.

Chapter 7 - Policy SP4: Fairer, Economic Growth

- 2.55 The policy sets out a requirement of additional 640,000 sqm of industrial floorspace and 72,000 sqm of office space. A large proportion of the requisite floorspace to meet employment needs is sought to be met via new employment allocations, including employment safeguarding sites.
- 2.56 Whilst it is welcomed that the local plan provides a strategy to meet economic requirements, a number of the proposed allocations are separated from urban areas and may not be sustainably located with an increased dependency on private vehicular movements. Industrial uses may require separation from residential properties due to incompatibility (noise and air pollution), albeit light industrial uses and other employment uses such as offices and services could be co-located with residential uses, which could potentially reduce commuting.
- 2.57 The site at Lower Burytown Farm is proposed as a mixed-use development, which would allow for a healthy mix of residential, community and commercial uses, leading to a reduced reliance on commuting.

Policy FE4: Development in Town Centres, District/Rural Centres and Local Shopping Parades

- 2.58 The policy requires urban development to demonstrate a suitable mix of appropriate uses to respond to changing demands. The policy seeks to restrict development that has significant adverse impact on the living conditions of existing, neighbouring properties.
- 2.59 Clarity should be provided within supporting / informative text on the definition of "significant adverse impact" and which matters are considered, such as noise, privacy, transport, etc.
- 2.60 It is considered that the wording of policy FE4 contradicts the council's strategy of focusing on urban regeneration schemes, particularly should these lead to an intensification of traffic flows. The policy (subsection 1) further inherently highlights the current market issue whereby urban redevelopment of sites is often not deliverable due to lack of viability, notwithstanding its inability to provide a sufficient level of affordable housing.
- 2.61 Whilst the principle of urban regeneration is generally welcome, the policy indicates the complexity of these, whereby greenfield sites, including sites such as the proposed mixed-use development at Lower Burytown Farm, would be able to provide viable schemes that deliver a higher percentage of affordable homes.

Chapter 8 - Policy SP5: Better-Connected, Active Neighbourhoods

- 2.62 The policy supports the creation of better-connected, greener neighbourhoods through sustainable transport options and encouragement of active travel.
- 2.63 The policy is welcome particularly as it promotes sustainable transport options. It is encouraged for the policy to further support the development of mixed-use sites, as the co-location of various interdependent uses would provide further options for residents to live and work within walking and/or cycling distance without dependency on wider commuting, thereby reducing impacts on existing road and public transport infrastructure.

Chapter 9 -Policy SP6: Climate Stability and the Environment

- 2.64 The policy addresses a wide range of matters, including ecology, energy efficiency and flood risk.
- 2.65 The proposed development on land at Lower Burytown Farm seeks the use of Garden City Principles as set out in Section 2.2 of the enclosed Vision Document.

Policy CSE3: Green Infrastructure in New Developments

- 2.66 The policy seeks major development to incorporate multifunctional green infrastructure (GI). The provisions of the policy are welcome and support development proposals that align with its requirements.
- 2.67 It is considered that development on urban sites may include an element of GI, but the issue of viability on regeneration sites may lead to a reduced provision of on-site GI.
- 2.68 Section 4.1 of the enclosed Vision Document sets out how the proposed development can achieve significant enhancements to biodiversity, landscape features and a reduction of environmental impact .

Policy CSE7: Landscape and Areas of Non-Coalescence

- 2.69 The policy requires development to demonstrate that its impacts on the landscape would not lead to detrimental harm, with a sympathetic design and suitable mitigation where required, in consideration of the most recent Landscape Character Assessment.
- 2.70 The site at Lower Burytown Farm is within the Midvale Ridge National Character Area (NCA). Section 1.7 of the enclosed Vision Document notes that the development masterplan would need to include sufficient enhancements to appropriately and sensitively “*knit the existing nucleated settlements adjacent to Swindon within the development of Lower Burytown Farm*”. Section 4.1 of the Vision Document sets out the approach, whereby the masterplan is informed by the existing woodland with a central focus for the vision to enhance existing landscape features including established woodland and hedgerows.

Policy CSE9: Managing Flood Risk

- 2.71 The policy wording should be amended to avoid unnecessary requirements. The current wording indicates that *all* development proposals must demonstrate that the sequential test has been applied.
- 2.72 The policy text should be reworded accordingly to ensure that only proposed development in areas *with an increased risk of fluvial flooding* should demonstrate that the sequential test has been applied, and if necessary the exception test.
- 2.73 As set out in the enclosed Vision Document, the site on land at Lower Burytown Farm is largely within Flood Zone 1 with a low probability of flooding, apart from a small area in the northern part of the site along the existing watercourse. The proposed masterplan avoids built development in the area of potential fluvial and surface water flooding, seeking to utilise the area as open space and GI instead.

3. Evidence Base

Strategic Housing and Economic Land Availability Assessment (SHELAA) 2025

- 3.1 The SHELAA assessed Lower Burytown Farm (481.85ha, ref. S0500) as not suitable, summarising as follows:
- 3.2 “Vast rural site located outside of current settlement boundary. Site includes areas at risk of flooding, heritage assets, non-designated archaeology and ancient woodland. Development would be on scale with a new town. Scale of development considered inappropriate. Significant concern regarding heritage, landscape, archaeology and ecology”.
- 3.3 The assessment marked the site ‘Red’ in relation to heritage, landscape, archaeology and ecology with regeneration opportunities and the location rated ‘Amber’.
- 3.4 The aforementioned matters are addressed in the accompanying Vision Document, which was based on a range of technical evidence in relation to heritage, landscape, ecology and arboriculture.
- 3.5 These are summarised as follows:
 - **Scale of development:** The proposal includes a new mixed-use, landscape led development, providing circa 4,000 residential dwellings on the 220 hectare site. The scale of development allows for a semi-autonomous development, proposed as a new settlement utilising garden village principles and creating a permeable neighbourhood to allow for various mix of uses within a 15 minute walk. The site, as a greenfield site, has potential to deliver a significant number of residential dwellings with a high proportion of affordable units.
 - **Landscape:** Landscape impacts are minimised by retaining existing woodlands, hedgerows, and creating a comprehensive green infrastructure network that respects the Midvale Ridge character and ensures visual integration. The enclosed Landscape and Visual Considerations report (January 2024) demonstrates that *“there are no in-principle constraints with regard to future built development of the site and any landscape features can be retained and incorporated into the masterplan through sensitive design”*. The site is noted to be *“remarkably well contained despite its size”*, particularly due to the local topography which limits intervisibility with the site.
 - **Heritage and archaeology:** Heritage assets, including the Castle Hillfort Scheduled Monument and listed buildings, are carefully respected through the proposed layout, including setbacks, specified development plots with sensitive design and enhancement of existing landscape to mitigate potential impacts. Further archaeological investigations will be undertaken at a later stage. The enclosed Archaeology and Heritage Appraisal (April 2024) concludes that any remaining harm to the relevant assets would *“most likely be at a low level”* and that *“there is no reason to believe that, given the scale of the proposed allocation, the harm to these assets would be of such magnitude as to inhibit its overall deliverability or capacity”*.
 - **Ecology:** The enclosed Ecology Position Note (January 2024) notes that *“arable fields dominate the site with improved field margins and poor semi-improved set-aside, considered limited in ecological value”*. The Note further notes the woodland parcels across the site and hedgerows, of diverse species and good condition with greater ecological importance. There is potential for protected species on site, albeit noting that masterplan design and a mitigation strategy could offset potential impacts should protected species be present on-site.

Conclusion

- 3.6 The site is considered available, achievable and deliverable, as demonstrated by the aforementioned, the enclosed Vision Document and associated technical evidence.
- 3.7 The site’s deliverability is underpinned by its single ownership, phased access, infrastructure capacity, and viability. There are no technical or environmental constraints that would prohibit or considerably delay site delivery.
- 3.8 Therefore, it is requested that the evidence base, including the SHELAA, is updated in consideration of the enclosed information, and the site considered as an allocation in the draft local plan.

Knight Frank, Planning Team



[knightfrank.co.uk](https://www.knightfrank.co.uk)

Your partners in property

Knight Frank Services Company is a private unlimited company registered in England and Wales with registered number 03170218. Our registered office is at 55 Baker Street, London, W1U 8AN. Knight Frank Services Company is a wholly owned subsidiary of Knight Frank LLP, a limited liability partnership registered in England and Wales with registered number OC305934.

An aerial photograph of a rural landscape with a patchwork of fields and some developed areas. A red outline highlights a specific area in the upper center. A dashed line runs diagonally from the top left towards the bottom right. Several irregular black outlines delineate different land parcels or planning zones. The text 'Lower Burytown Farm' is centered in a large, dark font. Below it, 'Regulation 18 Submission' and 'October 2025' are written in a smaller font.

Lower Burytown Farm

Regulation 18 Submission
October 2025

Foreword

This document has been prepared to support the Regulation 18 stage of the emerging Swindon Local Plan. It presents Lower Burytown Farm as an option for strategic growth, setting out the evidence, principles and parameters that would guide any future development.

The purpose is to inform consultation by explaining the site's opportunities and constraints, how the concept responds to Local Plan objectives, and the matters that would be tested further through plan-making and subsequent applications.

This Vision Document has been developed in response to the site, its context, the opportunities and constraints presented, and an aspiration to establish an outstanding new settlement.

Lower Burytown Farm is proposed to be a new community of up to 4000 homes. It is located on 429 hectares of primarily agricultural land outside Swindon, with good transport links via the A419, M4 and Swindon Railway Station.

The proposals are framed around Garden Village principles and a landscape-led approach. They emphasise sustainable movement, a mix of homes and community facilities, biodiversity and climate resilience, and a clear path to phased, deliverable growth. The content is consultation-focused, non-promotional and evidence-led, inviting views on whether and how the site could form part of Swindon's long-term growth strategy.

This document is the first key step in a series of stages of developing a comprehensive masterplan framework for Lower Burytown Farm. Further stages with associated engagement and consultation will occur over the coming years that are closely linked to the evolution and requirements of emerging local planning policy and framework.

Team



s+c architects

Architecture and Masterplanning



Campbell Reith

Highways Engineering and Hydrology



Knight Frank

Planning



edp

Heritage and Ecology

Contents

1	CONTEXT ANALYSIS	4	4	THE STRATEGY AND DESIGN	30
1.1	Site Location	5	4.1	Masterplan Design Strategy	31
1.2	Site Photographs	6	4.2	Proposed Framework Plan	35
1.3	Access and Connectivity	9	4.3	Connectivity	36
1.4	Walking and Cycling Distances	10	4.4	Enhanced Landscape Connections	37
1.5	Topography	11	4.5	Design Response to Heritage Assets	38
1.6	Flood Risk	12	4.6	Phasing	39
1.7	Landscape	13	4.7	Proposed New Housing	40
1.8	Ecology	14	4.8	Proposed Community Uses	41
1.9	Heritage	16			
2	THE VISION	17	5	REGULATION 18	43
2.1	The Vision for Lower Burytown Farm	18	5.1	Introduction to Regulation 18 Alignment	44
2.2	Garden City Principles	19	5.2	Contribution to Local Plan Objectives - With Reference to SBCLP 2026	45
2.3	Garden Village Principles for Lower Burytown Farm	20	5.3	Options and Alternatives Considered - Within the Swindon / SBCLP Context	46
2.4	A 15min Neighbourhood	21	5.4	Deliverability and Viability	47
2.5	House Types and Tenure	22	5.5	Compliance Matrix	48
			5.6	Consultation Focus and Next Steps	49
3	MASTERPLAN PRINCIPLES	23	6	THE WAY FORWARD	50
3.1	Residential	24	6.1	The Way Forward	51
3.2	Heritage	25			
3.3	Biodiversity	26			
3.4	Landscape	27			
3.5	Movement	28			
3.6	Access	29			

1 Context Analysis

This section summarises baseline conditions that inform consideration of Lower Burytown Farm as a potential strategic site. It clarifies key characteristics, constraints and opportunities relevant to plan-making and subsequent masterplanning.

1.1 Site Location

1.2 Site Photographs

1.3 Access and Connectivity

1.4 Walking and Cycling Distances

1.5 Topography

1.6 Flood Risk

1.7 Landscape

1.8 Ecology

1.9 Heritage

1.1 Site Location

The site is located to the north-eastern built-up edge of Swindon, and is nestled between the Broad Blunsdon to the south-west and Hannington to the north-east.

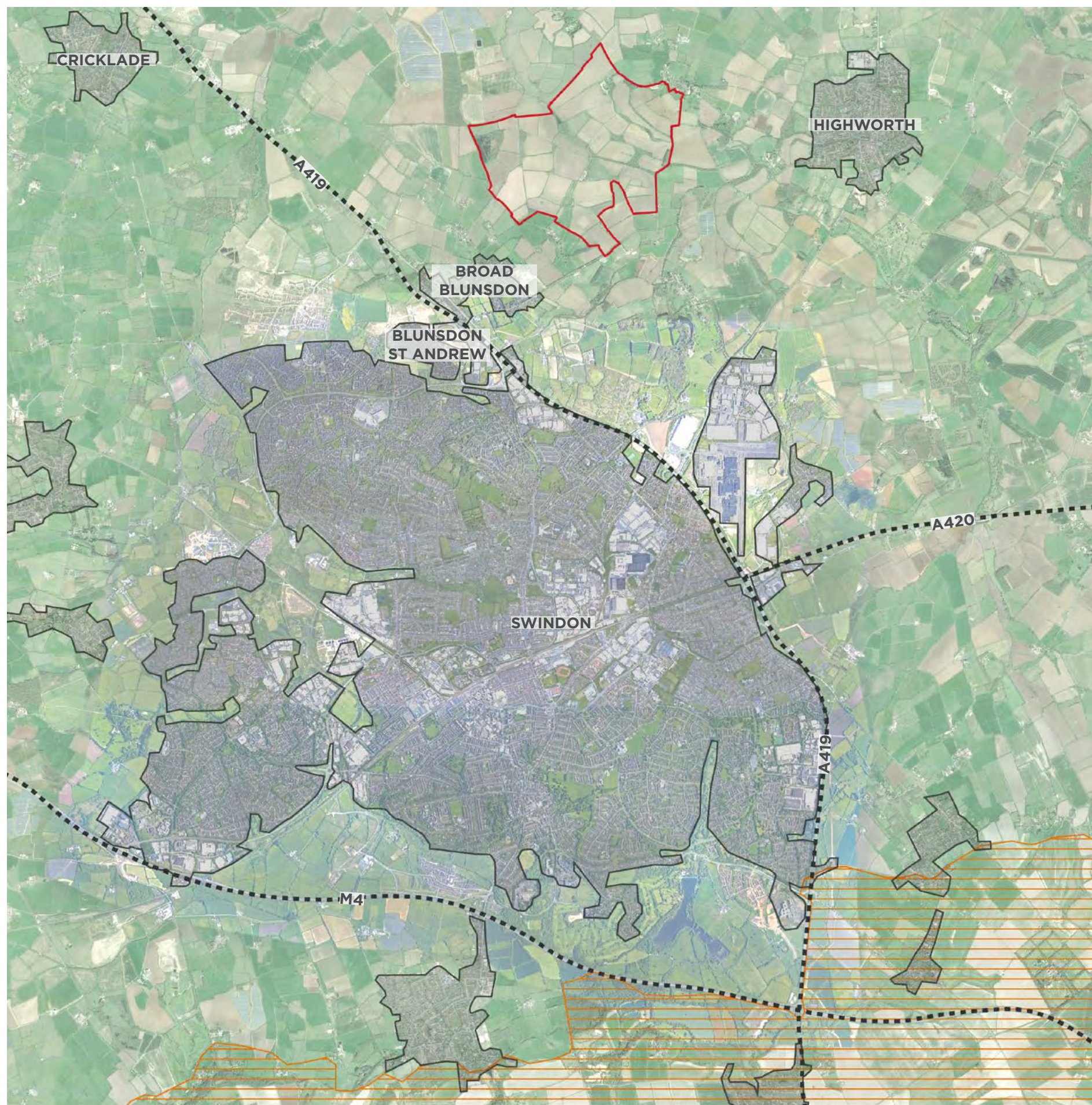
The site comprises 220 hectares (544 Acres) of agricultural land and associated farm buildings. It is located to the east of Broad Blunsdon, which lies within 0.5km from the north-eastern built-up edge of Swindon and extends to the settlement edge of Hannington, which lies within 4.35km of Swindon. These two settlements broadly define the southwest and northeast boundaries of the site. The site is bordered to the south and east by the existing road network, namely the B4091 and Queens Road. Field margins with further agricultural land contain the site uses beyond the north and west boundaries. Beyond the area to the north at Water and Castle Eaton is a large solar farm which sites within the landscape.

Broad Blunsdon is a residential village with a current population of circa 1,600. Recent undetermined planning applications and consented development, including S/OUT/18/0405 (70no dwellings), S/OUT/20/0096 (200no dwellings), S/OUT/19/1267 (115no dwellings), S/OUT/17/1821 (1,552no dwellings), will increase the population surrounding the village and extend development towards the boundaries of Lower Burytown Farm. Hannington is a rural settlement with a small population of circa 300 people.

Swindon has a population of circa 217,000 and is a major regional town and employment centre. It provides a wide range of shops, facilities, services and employment opportunities which provide services and facilities to support the populations of nucleated villages beyond its boundaries. Residents in these villages surrounding Swindon benefit from access to a diverse range of facilities, transport opportunities and employment in the town.

Key

- Site Boundary
- Settlement Boundary
- National Landscape
- Main Roads



1.2 Site Photographs

The site is characterised by open arable fields, hedgerows and drainage ditches, with localised belts of trees and small woodland blocks. Agricultural buildings are present in places.

The landform is generally gentle and enclosed, with limited long-distance views except towards the west where the landscape opens locally.

Existing ponds, vegetation and field boundaries provide opportunities for habitat retention, enhancement and green infrastructure linkages.



Open landscape



Existing hedgerows



Existing drainage ditch



Existing agricultural buildings



Existing agricultural buildings

1.2 Site Photographs (contd.)

These photographs indicate the variety of existing landscape features on the site.



Existing pond



Existing vegetation



Existing access



Existing trees



Open landscape with tree belts

1.2 Site Photographs (contd.)

These photographs indicate the openness of the site. The gentle change in topography encloses the site and long distance views are limited except to the west.



Open landscape



Open landscape indicating variety of topography



Open landscape



Open landscape looking west



Open landscape looking west

1.3 Access and Connectivity

Lower Burytown Farm lies directly to the north of the B4019, providing westbound routes into Broad Blunsdon and beyond to Swindon.

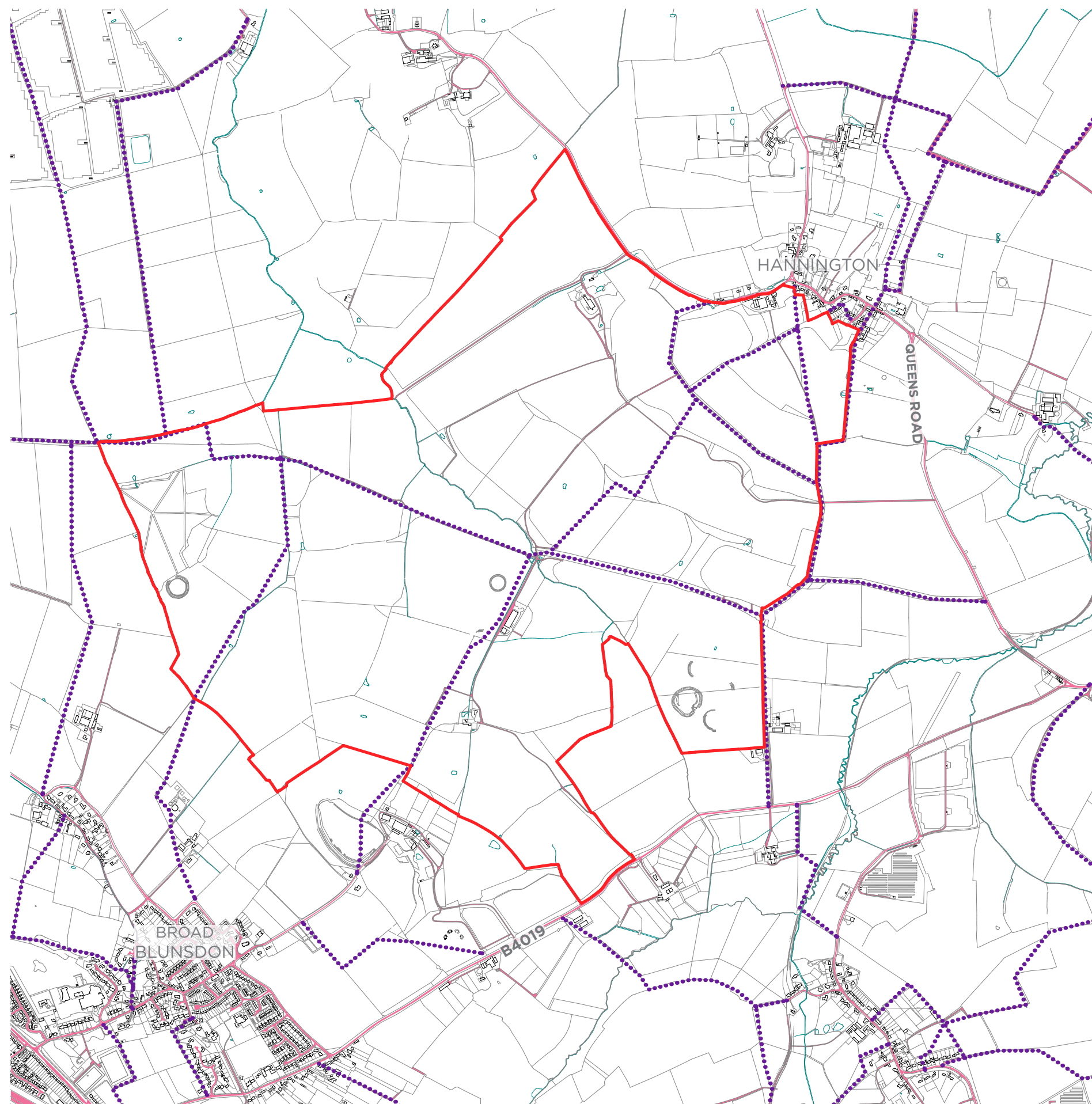
The B4019 provides connections to the A419 and a direct route to Cirencester to the north and the M4 to the south. The site's eastern boundary lies adjacent to Queens Road, which serves as the primary access to the village of Hannington from the B4019.

Broad Blunsdon is well served by public transport and provides the opportunity for long-distance trips connected to transport options in Swindon. Several bus stops operating a weekday and Saturday service coincide with typical working/educational patterns. The development would provide opportunities to enhance this network and improve access and connectivity for future residents within the site and surrounding villages. Current services link Broad Blunsdon to key areas across Swindon, including Groundwell Industrial Estate, Orbital Shopping Centre, Swindon Bus Station (within the Town Centre and adjacent to Swindon Railway Station) and Swindon College. Swindon railway station lies approximately 5.5 miles from Lower Burytown Farm by road, taking approximately 20 minutes to drive.

Future development would provide links for all modes of travel across the A419 to Swindon, ensuring that the garden village integrates physically and socially with the existing towns and villages and provides access to public transport provision, including the railway station.

Key

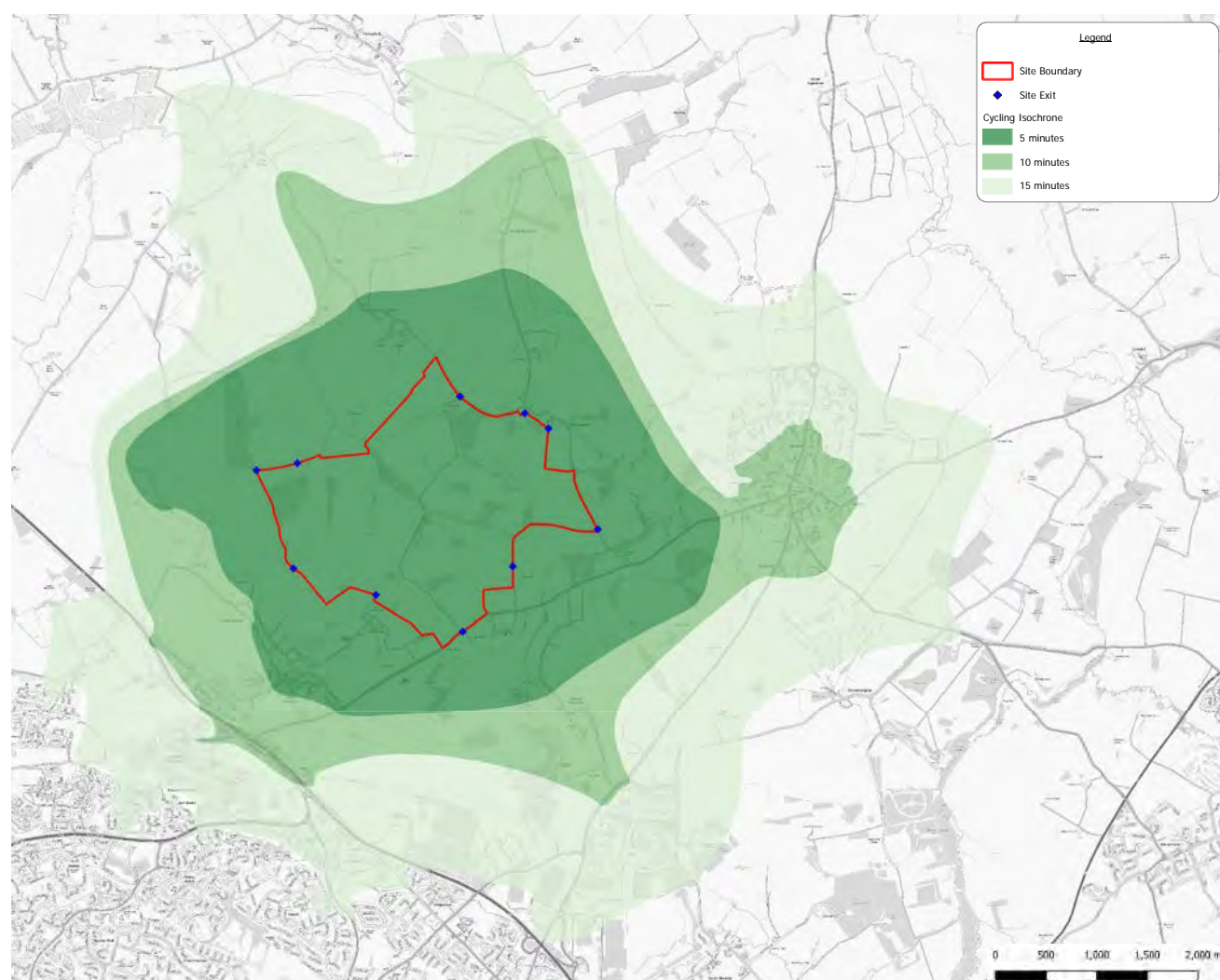
- Site Boundary
- Roads
- Public Footpaths and Bridleways



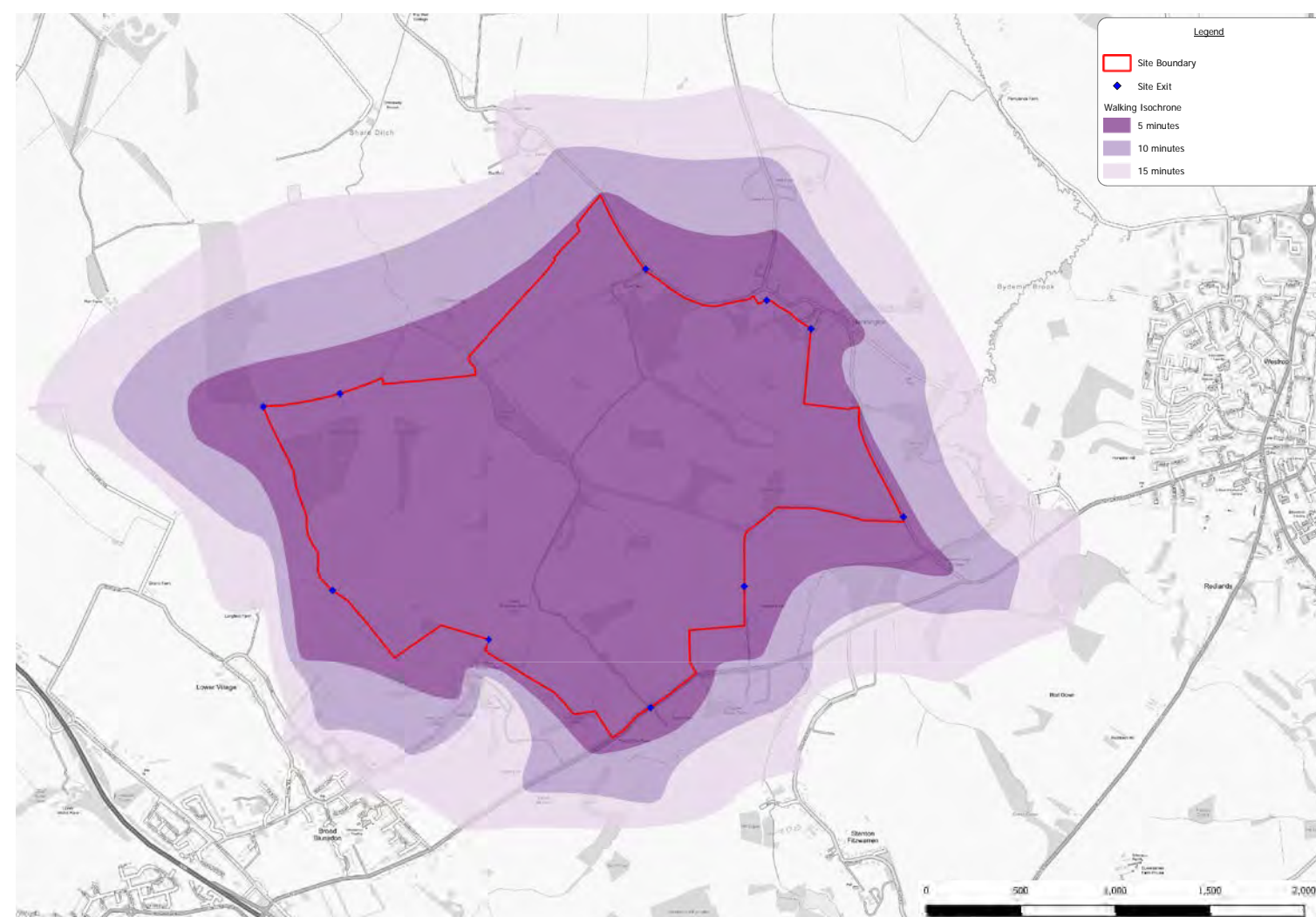
1.4 Walking and Cycling Distances

Isochrones from the site boundary demonstrate the potential to achieve walkable neighbourhoods and convenient cycling access to local centres and facilities. The masterplan framework is predicated on a 15-minute neighbourhood structure, placing day-to-day needs within a short walk or cycle and connecting to higher-order services by public transport and strategic cycle links.

Cycling Distance



Walking Distance



For more information see Campbell Reith's 'Transport Report'.



1.5 Topography

The site is predominantly level across its interior with elevated boundary conditions to the north-east and south-west which help to contain visual influence.

The gently undulating landform supports efficient development platforms while providing opportunities to integrate drainage, tree planting and habitat corridors aligned with existing contours.

Key

Site Boundary

— 1m Contours

— 5m Contours

Elevation (m AOD)

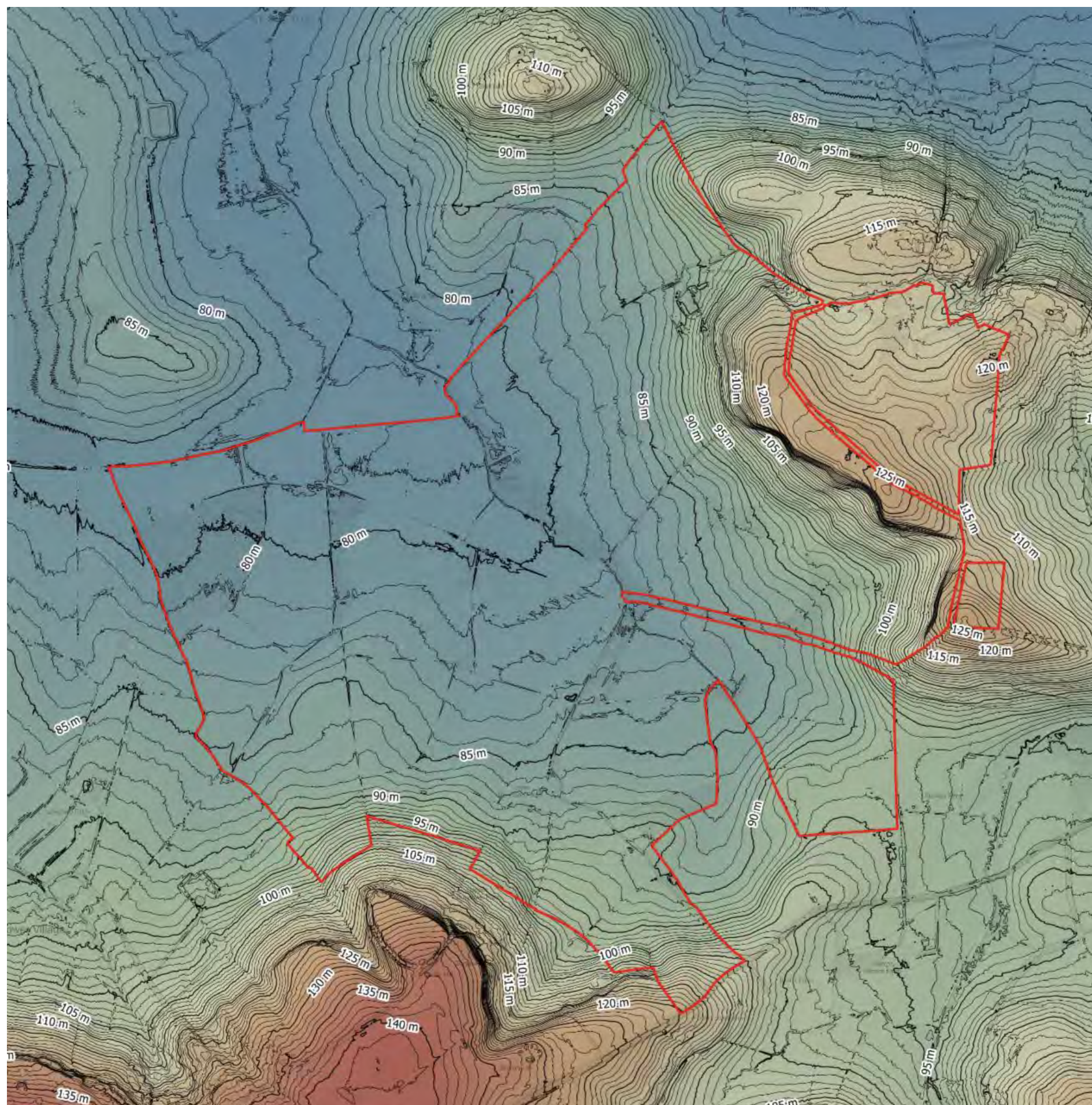
74

92

110

128

146



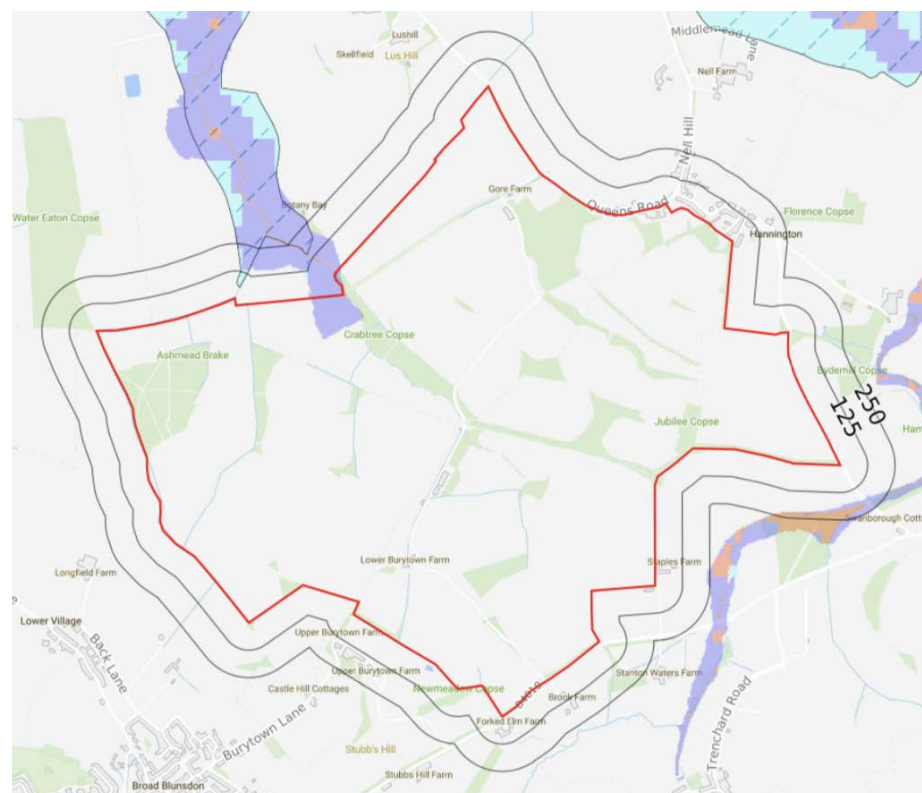
1.6 Flood Risk

There is limited existing flood impact on the site. These topographical and hydrographical characteristics reinforce the suitability for sustainable development on the site.

The Environmental Agency's flood zone mapping confirms that most of the site lies within Flood Zone 1 (land with the lowest probability of flooding). As with most landholdings of this size, a network of drainage ditches and minor watercourses supports the land's current agricultural use.

The site has varied and undulating topography. Design proposals are proposed to be informed by the existing landscape features to ensure a natural and appropriate solution that is in harmony with the current landscape features is adopted. This strategy also ensures that viability is improved and unnecessary costs are avoided within the development.

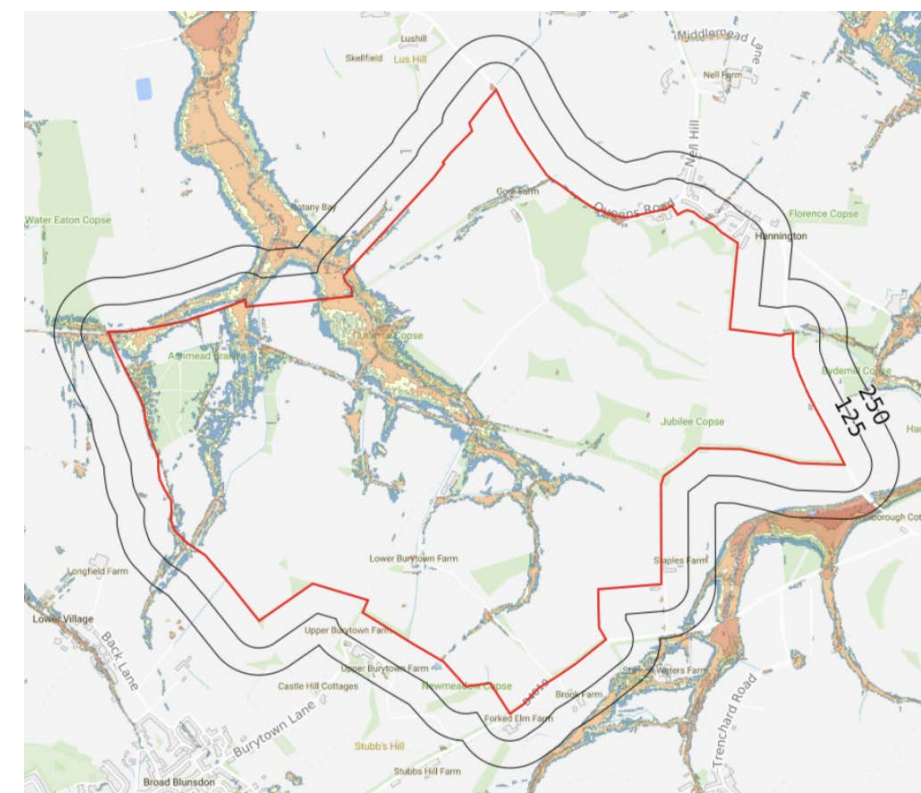
River and Coastal Flooding



River and Coastal Flooding - Flood Zones



Surface Water Flooding



1.7 Landscape

The main principles of the masterplan will be informed by the established landscape features.

There are no statutory or local/non-statutory landscape designations at the local or national level that affect the land. However, many attractive qualities of the existing landscape will look to be maintained and enhanced through the masterplanning process.

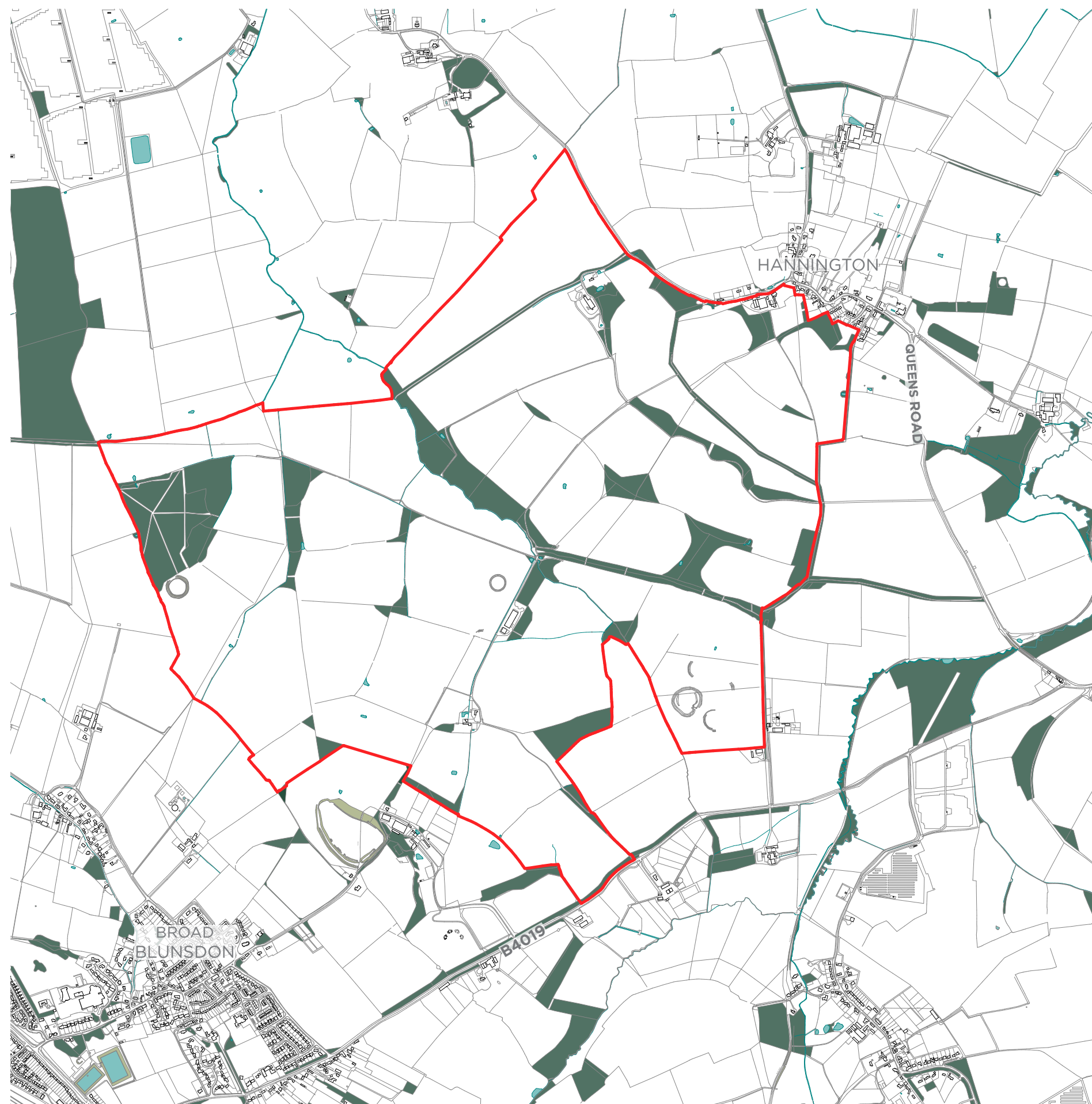
The site is within the Midvale Ridge National Character Area (NCA), a band of low-lying limestone hills stretching east-west from the Vale of Aylesbury in Buckinghamshire Swindon. It is surrounded by the flatlands of the Oxfordshire clay vales. Other than the urban areas of Swindon and Oxford. The site comprises a series of geometric field parcels, which are in large bounded by hedgerow vegetation, including hedgerow trees. Small scale blocks and belts of woodland and vegetation are found dispersed across the landscape, surrounded by agricultural fields, which evidence a heavily-managed agrarian landscape.

The inter-visibility between the elevated plateaus and vale landscape has been identified in the Council's landscape character assessment as one factor that influences the local landscape's perception. This is particularly present on the site due to its topography and ancient and semi-natural woodland areas, which are present within the landscape. The existing landscape and enhancements proposed within the masterplan will be crucial to appropriately and sensitively knit the existing nucleated settlements adjacent to Swindon with the development of Lower Burytown Farm. Open space and landscape proposals will range from large to small, formal to informal and open spaces will be spread across the development to meet a variety of needs and purposes and ensure the conservation of character and settlement identity. What is now primarily agricultural land will become a range of different green spaces and habitats, enhancing biodiversity and creating an attractive place for people to live.

Further information on Ecology can be found in EDP's 'Arboricultural Review' and 'Landscape and Visual Considerations'.

Key

- Site Boundary
- Existing Trees



1.8 Ecology

The proposals will be carefully balance with the existing ecology and enhanced biodiversity.

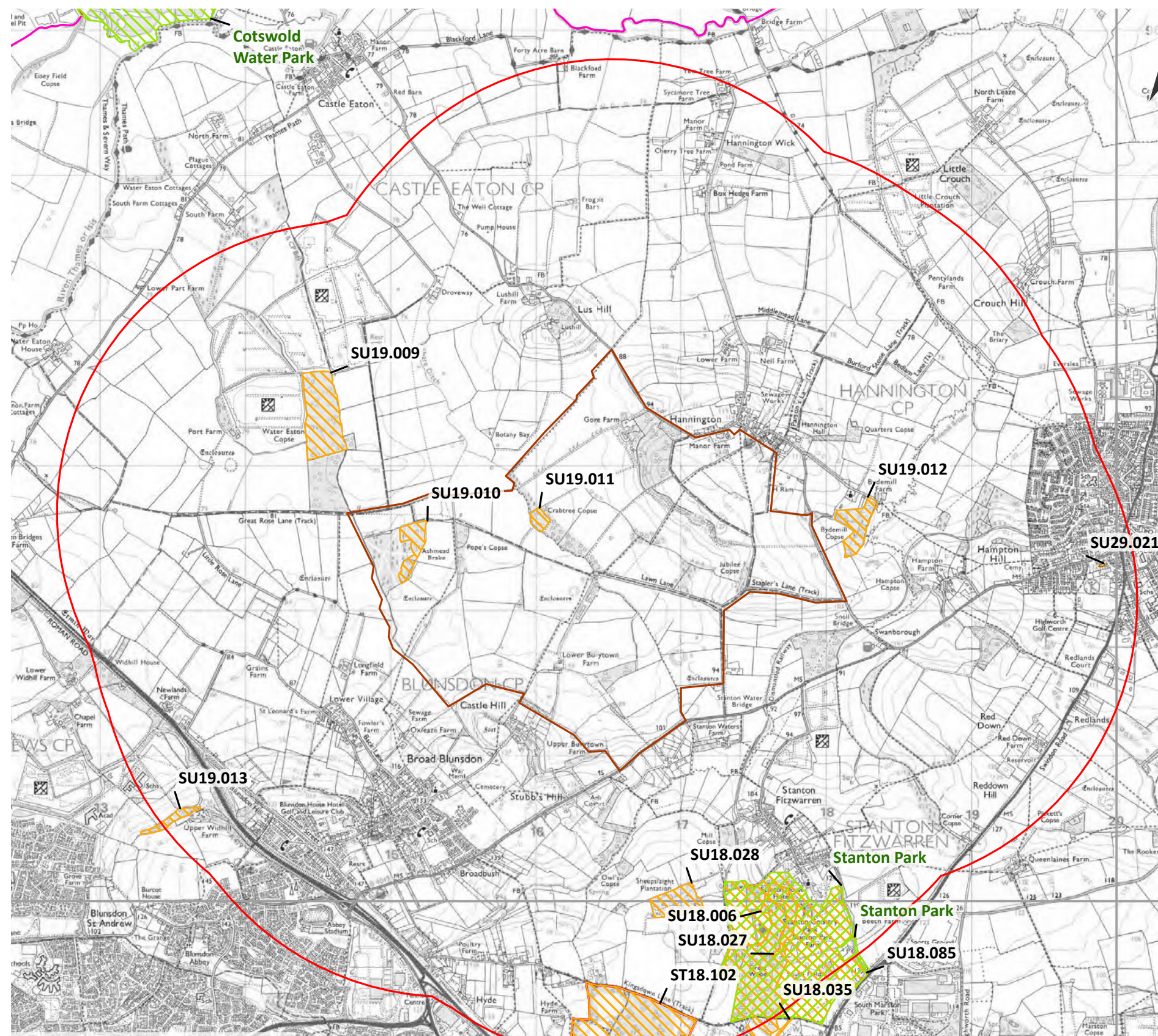
Most habitats are thought to be of limited intrinsic nature conservation value, comprising mainly managed arable farmland. Whilst there is no known barrier to development from ecology at this desk top stage, appropriate ecological assessments would be required as early as possible to identify ecological features, the potential for protected species on site, and the potential for impact on sites of importance as a result of the proposed development.

Masterplanning opportunities exist to enhance existing habitats, create more diverse habitats, and provide wildlife corridors as part of the developments scheme. A landscape led master plan will respect and enhance the existing natural environmental assets, the topography of the area, its watercourses and woodlands to create new high-quality landscapes and features as critical elements of the proposed garden village.

Further information on Ecology can be found in EDP's 'Ecology Position Note'.

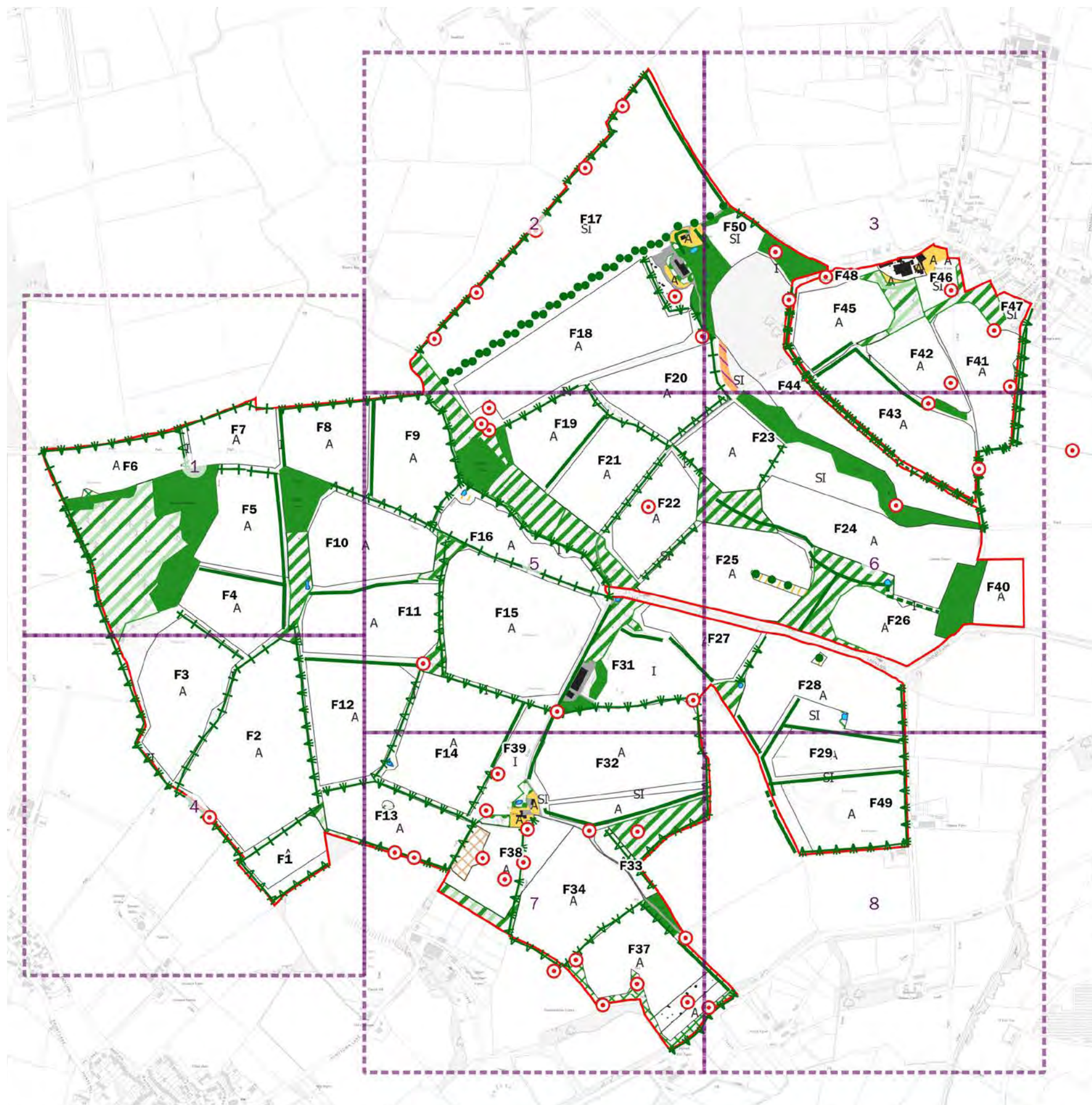
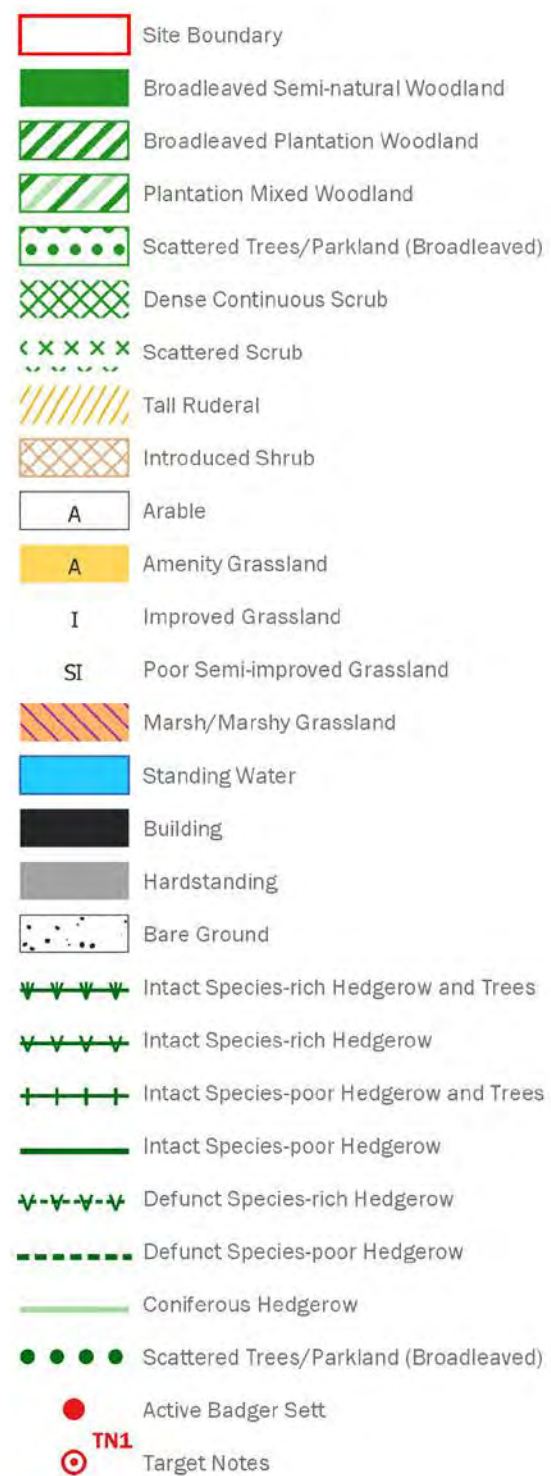
Key

- Site Boundary
- Site of Special Scientific Interest
- Special Protection Area
- Local Nature Reserve
- Local Wildlife Site



Wildlife Sites Within 2km

1.8 Ecology (contd.)



1.9 Heritage

There are a number of important heritage features that surround the site that will be respected and integrated into the landscape and masterplan strategy.

Lower Burytown Farm has remained largely undeveloped but contains certain sensitive areas covered by particular historical importance (proximity to Conservation Area, Scheduled Monument, Listed Buildings and Ancient Woodland), which, when masterplanning, should be taken into account and development avoided on these areas. Records also indicate several non-designated heritage assets and areas of noted archaeological significance across the site. The designated assets include:






- The Grade II Listed Lower Burytown Farm lies within the south western areas of the site (NHLE ref. 1300287).
- Two Grade II Listed Buildings are located at Upper Burytown Farmhouse c. 100 metres south west of the site. These comprise the farmhouse itself (NHLE ref. 1023284) and a well head to the north-east (NHLE ref. 1184131).
- Grade II Listed Milestone on B4019. Outside of the sites settlement boundary to the south. (NHLE ref: 1355996)
- Hannington Conservation area forms part of the sites northeastern boundary. The Conservation Area covers the entire settlement nucleus and contains 11 listed buildings, 10 of which are Grade II Listed, and the remaining building is Grade II* Listed.
- Broad Blunsdon Conservation Area lies c. 500m west of the site. The Conservation Area is made up of two parts separated by modern housing; the eastern extent lies in closest proximity to the site. The Conservation Area contains 14 Listed Buildings, two of which are Grade II* Listed, and the remainder is Grade II Listed Buildings.

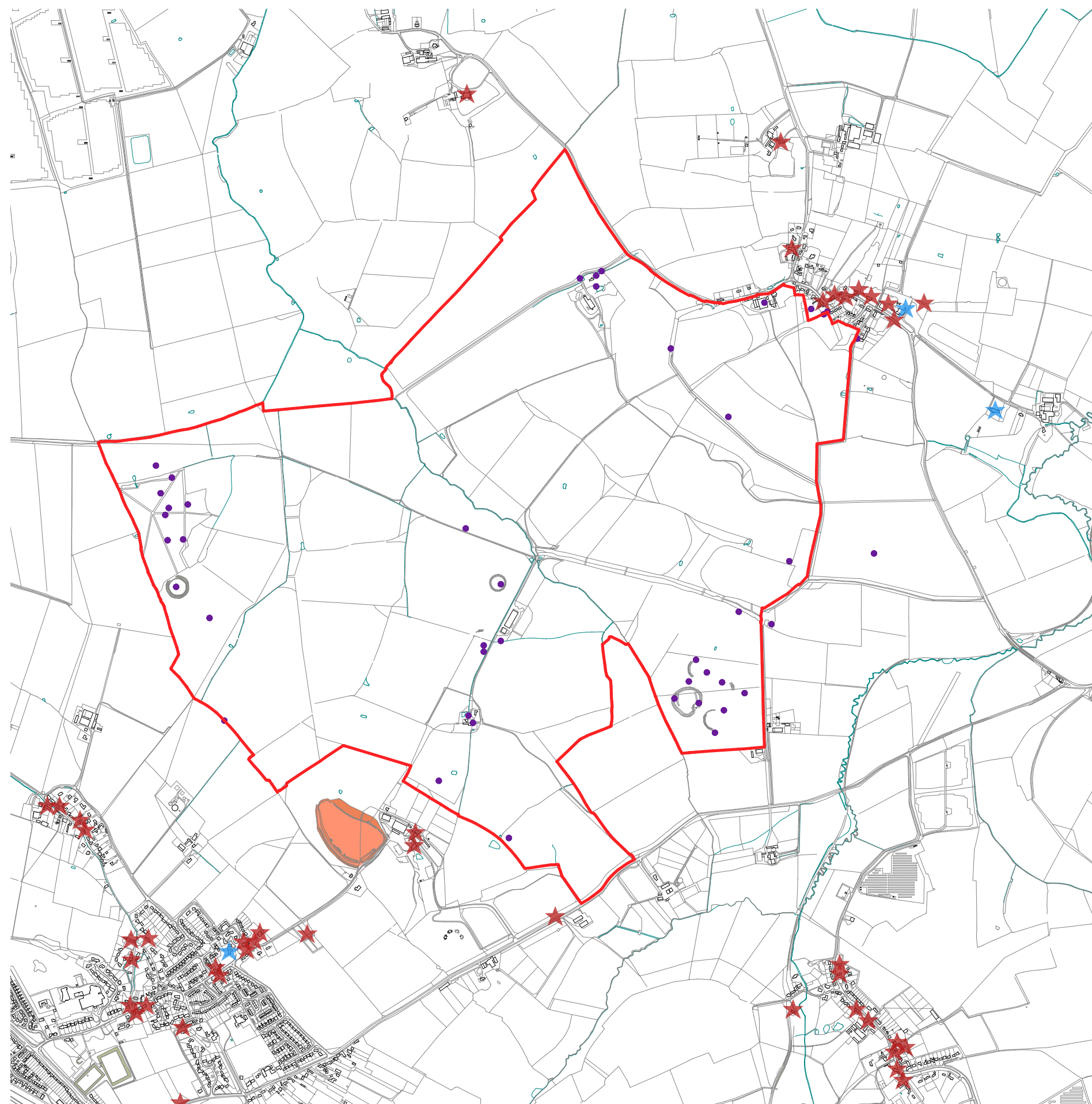
Whilst there are no known barriers to development within large areas of the land from heritage/archaeology aspects, taking the prevailing archaeological/heritage climate into account within the masterplanning and technical evidence gathering process will allow the establishment of appropriate buffer areas, consideration of building heights in sensitive areas, development layout and orientation treatment.

Appropriate surveys and consultations will be required as part of the planning process. Any issues relating to archaeology and heritage are likely to be addressed and resolved through this process.

Further information can be found in EDP's 'Archaeology and Heritage Technical Note'.

Key

- | | |
|---|--|
|  Site Boundary |  Scheduled Monument (Castle Hillfort) |
|  HER Assets |  Grade II Listed Buildings |
| |  Grade II* Listed Buildings |



2 The Vision

The vision is to create a sustainable, landscape-led garden village that contributes meaningfully to meeting Swindon's housing needs, widens housing choice, and delivers social and environmental benefits.

Neighbourhoods will be designed around everyday walking and cycling, with local centres, schools and community facilities embedded within an accessible green and blue infrastructure network.

2.1 The Vision for Lower Burytown Farm

2.2 Garden City Principles

2.3 Garden Village Principles for Lower Burytown Farm

2.4 A 15min Neighbourhood

2.5 House Types and Tenure

2.1 The Vision for Lower Burytown Farm

The vision focuses on: (i) high-quality, mixed-tenure homes; (ii) a strong structure of multifunctional green spaces and habitat corridors; (iii) a permeable movement network that favours active travel and public transport; (iv) characterful, context-responsive design; and (v) long-term stewardship of community assets. The concept is illustrative and subject to refinement through consultation and technical testing.

The initial design concept is in line with good design principles to minimise car use and encourage healthy living. New green links will provide connectivity throughout the development.

These links will ensure greener forms of travel are easier for people living here. Mixed used development will connect to these new links. The architectural character of the new buildings will be informed by the wider masterplan and the distinctive quality of the surroundings.

Good design comes from listening and obtaining a range of knowledge to inform and adapt the overall vision. To achieve the new vision, we propose a detailed level of community engagement at all levels including the local authority, community groups and individuals.

The new vision will embrace best-practice placemaking principles, delivering a high-quality, coherent, and integrated design approach. It will be carefully considered and responsive, respecting local assets and ensuring the new community is meaningfully embedded within its surroundings.

The new community will feel safe, where people can walk around their neighbourhood easily, and will have local facilities nearby such as shops, schools and community assets. The design will create a unique urban realm which can be enjoyed by all who live there as well as by the existing communities.

The settlement pattern to the north of Swindon is dispersed and characterised, by villages and small towns. The extent of the area available at Lower Burytown Farm is significant, and not all of the land can or should be utilised for development, certainly in terms of landscape and flood risk management. The development concept creates new distinctive neighbourhoods that are consistent with the latest sustainability best practice.

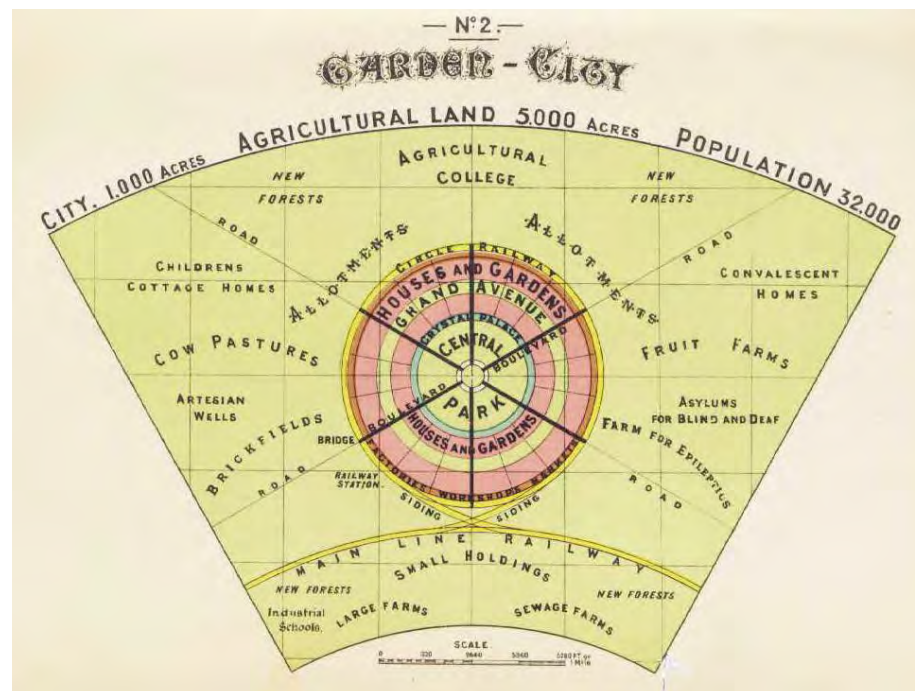


1. Schedules Monument (Castle Hillfort) 2. HER Asset 3. Green Gap 4. Hilltop 5. B4019 6. Queens Road 7. Proposed Main Road
8. Proposed Green Lung Through Site 9. Green Links Through Development to Landscape 10. Areas for Development 11. Countryside

2.2 Garden City Principles

The TCPA's Garden City Principles 'are a distillation of the key elements that have made the Garden City model of development so successful, articulated for a 21st century context. Taken together, the principles form an indivisible and interlocking framework for the delivery of high-quality places.

A Garden City is a holistically planned new settlement which enhances the natural environment and offers high-quality affordable housing and locally accessible work in beautiful, healthy and sociable communities.'



The following principles and explanations are from 'The Art of Building a Garden City: Designing New Communities for the 21st Century'.

The Garden City Principles include:

1 Land value capture for the benefit of the community.

New garden cities should demonstrate how land values are captured for the benefit of the community.

2 Strong vision, leadership and community engagement.

New garden cities should demonstrate a commitment to meaningful and ongoing community participation in the development process.

3 Community ownership of land and long-term stewardship of assets.

New garden cities should demonstrate how assets will be managed for the benefit of the community in perpetuity.

4 Mixed-tenure homes and housing types that are genuinely affordable.

As a benchmark, at least 30% of homes in a new garden city should be for social rent. Other forms of 'sub-market housing', such as shared equity and low-cost or discounted ownership, should apply to at least another 30% with clear mechanisms to ensure that this arrangement is made available in perpetuity.

5 A wide range of local jobs in the Garden City within easy commuting distance of homes.

New garden cities must provide a full range of employment opportunities, with the aim of no less than one job per new household.

6 Beautifully and imaginatively designed homes with gardens, combining the best of town and country to create healthy communities, and including opportunities to grow food.

Ultimately new garden cities must be beautiful places that lift the spirits of those who live there.

7 Development that enhances the natural environment, providing a comprehensive green infrastructure network and net biodiversity gains, and that uses zero-carbon and energy-positive technology to ensure climate resilience.

New garden cities must provide, as a minimum (and including private gardens), 50% of their total area as green space, of which at least half should be public and consist of a network of multifunctional, well-managed, high quality green spaces linked to the wider countryside.

New garden cities must be 'energy positive': by maximising opportunities for energy efficiency and renewable-energy generation, they should aim to produce more energy than they consume.

8 Strong cultural, recreational and shopping facilities in walkable, vibrant, sociable neighbourhoods.

New garden cities must provide a broad range of facilities - including space for social interaction, formal and informal cultural activities, sport and leisure - within walking distance of homes.

9 Integrated and accessible transport systems, with walking, cycling and public transport designed to be the most attractive forms of local transport.

The garden city's design must enable at least 50% of trips originating there to be made by non-car means, with a goal to increase this over time to at least 60%, and must use the best practice in street and transport design as a minimum standard.

2.3 Garden Village Principles for Lower Burytown Farm

The Garden Village Principles for Lower Burytown Farm include:

1 Land value capture for the benefit of the community.

There are some interesting and attractive features within the site and in the surrounding landscape, recognised through the number of designations and assets. Our vision has focused on retaining the landscape character of the site and limiting the potential visual impact of development, whilst creating a sustainable new community with walkable neighbourhoods, which sits well within its surrounding landscape, is not intrusive, and does not detract from the existing qualities of the local countryside.

2 Strong vision, leadership and community engagement.

Leadership and community will be at the heart of the design evolution and proposed garden village, whereby clear community engagement will influence phases of development through active participation and the evolution of garden village design principles. Strong leadership and governance throughout the next phases of the local plan will ensure ongoing community engagement and long-term stewardship of assets.

3 Community ownership of land and long-term stewardship of assets.

Through effective engagement, Lower Burytown farm will deliver community ownership and stewardship of open space and facilities, open space and facilities optimised to build community cohesion; facilities well run; fair for everyone across the phased development. Delivering this engagement with the community and technical stakeholder groups to ensure the masterplanning process is locally led will be critical throughout the planning and design phases.

4 Mixed-tenure homes and housing types that are genuinely affordable.

A variety of housing initiatives will be explored, including new starter homes, and shared ownership to make affordable high quality design and low cost living an aspiration.

5 A wide range of local jobs in the Garden Village within easy commuting distance of homes.

This new Garden Village will begin to provide access to a full range of employment opportunities across the development.

6 Beautifully and imaginatively designed homes with gardens, combining the best of town and country to create healthy communities, and including opportunities to grow food.

Ultimately new garden villages must be beautiful places that lift the spirits of those who live there. The aspiration to design food into landscape features enables people to think about the habitat they live within but to connect meaningfully with the natural landscape.

7 Development that enhances the natural environment, providing a comprehensive green infrastructure network and net biodiversity gains, and that uses zero-carbon and energy-positive technology to ensure climate resilience.

New garden villages must provide a substantial proportion of their total area as green space, including private gardens, with a significant share designed as public areas forming a network of multifunctional, well-managed, high-quality spaces connected to the wider countryside.

New garden villages must be 'energy positive': by maximising opportunities for energy efficiency and renewable-energy generation, they should aim to produce more energy than they consume.

Lower Burytown Farm will do its part minimising its carbon footprint and to allow for low cost energy to be provided to the people that live here.

8 Strong cultural, recreational and shopping facilities in walkable, vibrant, sociable neighbourhoods.

New garden villages must provide a broad range of facilities - including space for social interaction, formal and informal cultural activities, sport and leisure - within walking distance of homes.

9 Integrated and accessible transport systems, with walking, cycling and public transport designed to be the most attractive forms of local transport.

The garden village's design must enable at least 50% of trips originating there to be made by non-car means, with a goal to increase this over time to at least 60%, and must use the best practice in street and transport design as a minimum standard.



The Transect by Duany Plater-Zyberk & Co

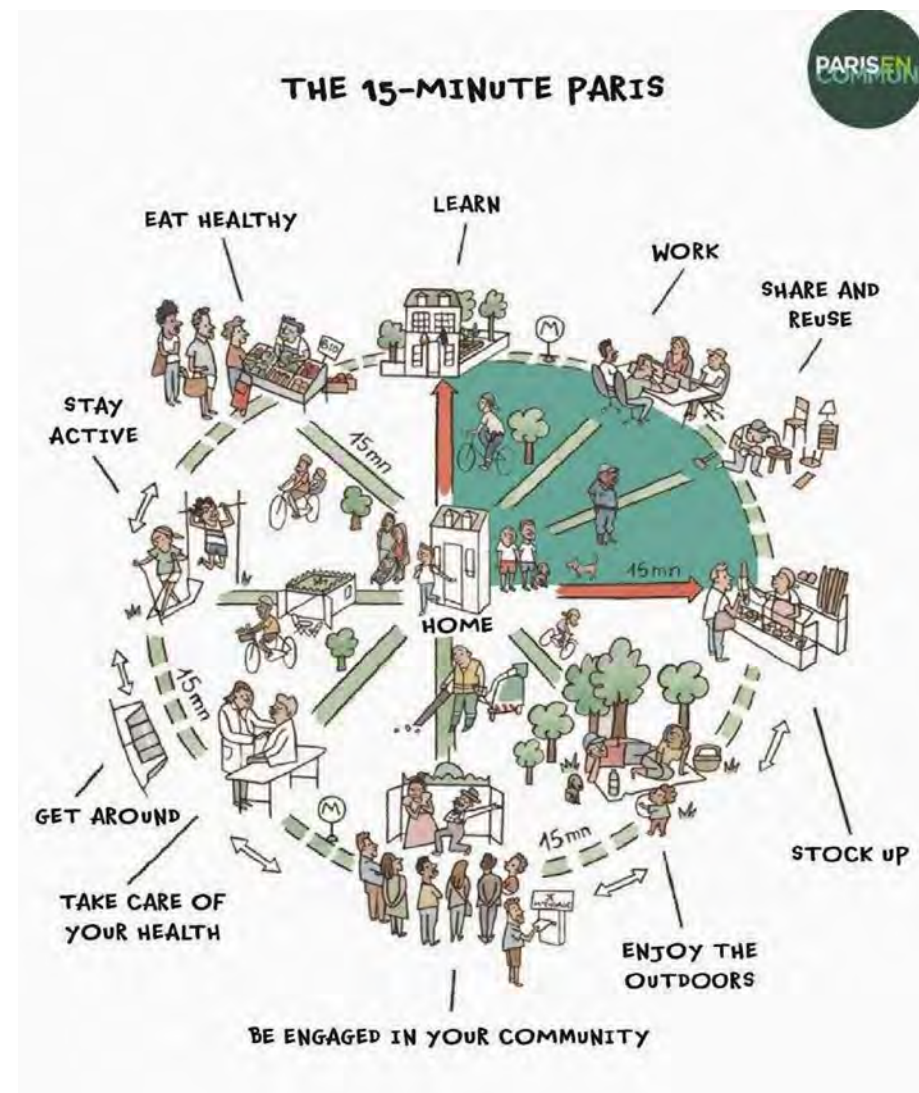
The transect shows a series of zones that transition from rural farmhouses to the dense urban core. An important aspect of transect planning is that it incorporates a variety of uses into a single neighbourhood and minimise the need for long distance travel as it allows for local facilities and amenities. It is a positive tool that the masterplanning process will utilise to ensure that every neighbourhood has sufficient local facilities while keeping the density appropriate for the location.

2.4 A 15min Neighbourhood

The 15-Minute Neighbourhood is a framework for creating more inclusive, equitable, and sustainable communities. It promotes the idea that everyone should have access to daily needs and essential services—such as work, shops, schools, leisure, and healthcare—within a 15-minute walk or cycle from their home.

Originally developed by Professor Carlos Moreno at the Sorbonne in Paris, the concept focuses on reorganising how people use time and space to improve quality of life and reduce environmental impact.

At Lower Burytown Farm, the proposals will draw on the key principles of the 15-Minute Neighbourhood, fostering a vibrant mix of uses and activities that support local living. The design will enable residents and the wider community to access a diverse range of amenities easily, encouraging more sustainable, healthy, and socially connected lifestyles.



The 15min Paris by Carlos Moreno



2.5 House Types and Tenure

A mix of dwelling types and sizes will support inclusive, resilient communities and adaptable life-stages. Affordable Housing, market homes, later-living options and build-to-rent will be considered to broaden choice.

Design coding would promote quality, character and energy performance, while allowing diversity between parcels.

