

REGULATION 18 CONSULTATION STATEMENT

SWINDON LOCAL PLAN 2043

SWINDON BOROUGH COUNCIL

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Section 1: Executive Summary

Swindon Borough Council is preparing a new Local Plan which, on adoption, will replace the Swindon Borough Local Plan 2026. The Swindon Local Plan 2043 will form a key part of the development plan for the Borough, setting out the strategy and policy framework to guide development and growth over a twenty-year period. It will identify the Borough's housing, employment and infrastructure needs, where this should be located, and provide guidance for the determination of planning applications.

The preparation of a Local Plan must follow the process set out in The Town and Country Planning (Local Planning) (England) Regulations 2012. Regulation 18 Consultation represents the first formal stage in the plan-making process, during which local planning authorities are required to invite comments on the content of the emerging plan.

Swindon Borough Council undertook a Regulation 18 Consultation on the emerging Local Plan between 1st September and 13th October 2025. Residents, landowners and statutory stakeholders were encouraged to comment on the Council's proposals. The responses were analysed and published on the Swindon Borough Council website: [New Local Plan consultation responses | Swindon Borough Council](#).

This Consultation Statement will address who was consulted during the Regulation 18 consultation, how they were consulted, the main issues raised by respondents and how those issues have been considered in preparing the Regulation 19 version of the Swindon Local Plan 2043.

Section 2 of this statement sets out who was consulted as part of the Regulation 18 Consultation and how the consultation was undertaken. This includes the statutory consultees, organisations, residents, key stakeholders and other interested parties who were given the opportunity to participate in the consultation, as well as the range of methods used by the Council to organise and publicise the consultation and enable representations to be made.

Section 3 provides a policy-by-policy summary of the representations received during the Regulation 18 consultation, setting out the main issues and themes raised by respondents. For each policy, it then provides a summary of the representations received and explains how these have been considered in preparing the Regulation 19 version of the Local Plan.

The accompanying Appendices provide supporting information and evidence of the consultation undertaken. They include the list of parties consulted, copies of the notifications issued to stakeholders, online and social media publicity, posters and flyers, press releases, information provided at consultation events, exhibition boards and the Regulation 18 representation form. It offers

a record of the methods used by the Council to publicise the consultation, engage with stakeholders and enable representations to be submitted.

Section 2: Who We Consulted and How

Who did we consult?

The Council recognises that it is vital that as many people and organisations as possible are given the opportunity to input into the plan-making process.

In accordance with the Council's Statement of Community Involvement and The Town and Country Planning (Local Planning) (England) Regulations 2012, we consulted with general consultation bodies who may be interested in the plan, specific consultation bodies described in legislation and residents and other persons carrying out business in the local area.

The full list of all parties consulted have been set out in Appendix A.

How did we consult?

We sent 391 email notifications to:

- Ward Councillors
- Parish Councillors
- Organisations
- Statutory Consultees
- Developers and Site Agents
- Internal Departments and Employees
- Stakeholders opted in to the mailing list

Email notifications detailed what the new local plan aims to do, how to view the new local plan and how to submit comments for Regulation 18. Appendix B outlines the different notices sent to each stakeholder group.

The Council issued two press releases, launching the Regulation 18 Consultation period on the SBC website and social media platforms such as Facebook and LinkedIn. In total, the website received 9,542 clicks and reached a combined total of 39,435 people across Facebook and LinkedIn. Press releases, social media posts and graphics are outlined in Appendix C, D and E.

As a result, the Regulation 18 Consultation was picked up by local news and media outlets, including Greatest Hits Radio, Swindon Link Magazine, Your Swindon and the Swindon Advertiser. The press release was featured on Parish and Ward Council websites and promoted on Wiltshire Council's Instagram account several times. This was paramount in publicising to a wide range of Swindon's residents and encouraging participation from the public.

Posters, hard copies of the Regulation 18 Plan and policies map were distributed to libraries across the borough and the Civic Reception of the Council offices. These were available for view throughout the length of the consultation period.

Table 1: Locations of hard copies of the plan available to the public

Location	Address
Swindon Central Library	Regent Circus, Swindon, SN1 1QG
Highworth Library	Brewery St, Highworth, Swindon, SN6 7AJ
North Swindon Library	Orbital Retail Park, Thamesdown Dr, Swindon, SN25 4AN
Park Library	Cavendish Square, Park South, Swindon, SN3 2LZ
West Swindon Library	Whitehall Way, Swindon, SN5 7DL
Swindon Borough Council Civic Offices	Civic Offices, Swindon, SN1 2JH

Consultation Events

We held three engagement sessions during September and October 2025. This included a private briefing for parish and ward councillors before opening the event to the public.

The engagement sessions were an opportunity for residents to view the proposed policies and site allocations, ask questions and provide feedback. The sessions were open for two hours, allowing attendees to visit a series of themed tables covering key elements of the Local Plan. Topics included the Infrastructure Delivery Plan (IDP), policies map, sustainability appraisal, open space and spatial strategy. Due to the high attendance at the Wroughton event, officers adopted a question-and-answer format to ensure all attendees questions were addressed. The resources used at the events, such as pamphlets and exhibition boards, are provided in Appendix F and G.

Table 2: List of Consultation Events

Location	Date	Time	Venue
Central Swindon	29 th September 2025	16:30 – 17:00 (Parish & Ward Councillors) 17:00 – 19:00 (ALL)	Central Community Centre, Emlyn Square, Swindon, SN1 5BP
North Swindon	2 nd October 2025	15:45 – 17:45 (Parish & Ward Councillors) 17:00 – 19:00 (ALL)	Moredon Sporting Hub, Cheney Manor, Swindon, SN2 2QJ
Wroughton	6 th October	16:30 – 17:00 (Parish & Ward Councillors) 17:00 – 19:00 (ALL)	Ellendune Community Centre, Barret Way, Wroughton, Swindon, SN4 9LW

Officers also represented the Local Plan at the Let's Talk Swindon drop-in events held at the Council Civic Offices. Let's Talk Swindon is a community engagement

programme that provides the public with the opportunity to meet and speak with local representatives and Council officers about issues and initiatives impacting the Borough. The dates and times of the sessions attended are set out below.

- 4th October 2025 – 11:00 – 12:30
- 4th October 2025 – 13:00 – 14:30
- 4th October 2025 – 15:00 – 16:30
- 8th October 2025 – 18:30 – 20:00

Consultation Responses

How did we invite responses?

Responses to the Regulation 18 Local Plan could be made through the representation form found on the SBC website and submitted using the Council's engagement portal. Alternatively, respondents could download the form and return it via email or post or fill out a paper representation form provided at the consultation events. A copy of the representation form is provided within Appendix H.

What responses did we receive?

We received 589 responses to the representation form. These were collated, considered thoroughly and incorporated into the local plan where suitable.

Consultation responses can be accessed using the Schedule of Representations Index, which helps you find and view individual responses. The index table lists each respondent's response number, name, job title (where provided), organisation (where provided), and whether they are acting on behalf of another party. It also includes links to the relevant document so responses can be viewed alongside the correct page number.

Section 3: Policy-By-Policy Regulation 18 Draft Local Plan Main Issues and Responses

This section provides a policy-by-policy summary of the main issues raised through the Regulation 18 consultation. It sets out the key themes emerging from the representations received and explains how the main issues raised have been considered in the preparation of the Regulation 19 version of the Local Plan.

As the Local Plan has evolved following the Regulation 18 consultation, several policies have been renamed and/or recoded between the Regulation 18 and Regulation 19 stages. The table below identifies the corresponding Regulation 18 and Regulation 19 policies and sets out where policy names and/or reference codes have changed. This provides a cross-reference between the two versions of the Local Plan and supports the policy-by-policy summaries that follow.

Table 3: Policy cross-reference table. Regulation 18 draft policies cross-referenced with replacement Regulation 19 Local Plan policies.

Regulation 18 Swindon Local Plan 2043 Policies	Replacement policy in the Regulation 19 Swindon Local Plan 2043
SS1: Swindon's Spatial Approach to Growth	SS1: Swindon's Spatial Approach to Growth
SS2: Settlement Hierarchy	SS2: Settlement Hierarchy
SGL 01: Swindon's Central Area	SDA01: Swindon's Central Area
SGL 02: New Eastern Villages (NEV)	SDA07: New Eastern Villages
SGL 03: Kingsdown	SDA08: Kingsdown
SGL 04: Wichelstowe	SDA06: Wichelstowe
SGL 05: East Wroughton	SDA12: Land at Wroughton
SGL 06: North Tadpole	SDA09: North Tadpole
UGA 01: Marlowe Avenue	SDA03: Marlowe Avenue Urban Regeneration Area
UGA 02: Pipers Way	SDA02: Pipers Way Urban Regeneration Area
SP1: Sustainable Development	Deleted
SD1: Effective Use of Land	SD2: Effective Use of Land
SD2: Mixed Use Developments	SD3: Mixed Use Developments
SD3: High-Quality Design	SD1: High-Quality Design
SD4: Inclusive Design	SD4: Inclusive Design
SD5: Tall Buildings	SD5: Tall Buildings
SD6: Villages and Development in the Countryside	Deleted
SD7: Residential Extensions and Alterations	SD6: Residential Extensions and Alterations
SD8: Historic Environment	SD7: Historic Environment
SD9: Heritage Transport	SD8: Heritage Transport
SP2: Homes for the Community	HC1: Meeting Local Housing Needs
HC1: Housing Tenures and Sizes	HC2: Housing Tenures and Sizes
HC2: Affordable Housing	HC3: Affordable Housing
HC3: Accessible Housing	HC4: Accessible Housing
HC4: Specialist Housing	HC5: Specialist Housing including Housing for Older People

HC5: Houses in Multiple Occupation and Sub-Division	HC6: Houses in Multiple Occupation and Sub-Division
HC6: Rural Exceptions Sites and Rural Worker Dwellings	HC7: Rural Exception Sites and Rural Workers Dwellings
HC7: Self and Custom Build Housing	HC8: Self and Custom Build Housing
HC8: Gypsy, Traveller and Travelling Showperons' Accommodation	HC9: Gypsy, Traveller and Travelling Showpeople's Accommodation
SP4: Fairer, Economic Growth	E1: Economic Strategy and Meeting Employment Needs
FE1: Office (scale and location)	E1: Economic Strategy and Meeting Employment Needs
FE2: Industrial Land (Scale and location)	E1: Economic Strategy and Meeting Employment Needs
FE3: Network and Hierarchy of Centres	E5: Network and Hierarchy of Centres
FE4: Development in Town Centres, District/Rural Centres and Local Shopping Parades	E6: Development in Town Centres, District/Rural Centres and Local Shopping Parades
FE5: Concentration of Uses	HL2: Concentration of Uses
FE6: Evening, Night-time and Cultural Economy	E7: Evening, Night-time and Cultural Economy
FE7: Employment, Skills and Training	E4: Employment, Skills and Training
SP5: Better-connected, Active Neighbourhoods	Deleted
ST1: Promoting Sustainable Transport	ST2: Promoting Sustainable Transport
ST2: Improving Public Transport	ST5: Improving Public Transport
ST3: Freight and Logistics	ST7: Freight and Logistics
ST4: Transport Assessments, Transport Statements and Travel Plans	ST8: Transport Assessments, Transport Statements and Travel Plans
ST5: Parking and Electric Vehicle Infrastructure	ST9: Parking and EVs
SP6: Climate Stability and the Environment	Deleted
CS1: Carbon Reduction and Sustainable Design in new development	CSE2: Carbon Reduction and Sustainable Design
CSE2: Whole Life Carbon Assessments (WLCA)	CSE3: Whole Life Carbon Assessments (WLCA)
CSE3: Green Infrastructure in New Developments	CSE6: Green Infrastructure in New Developments
CSE4: The Green Infrastructure Network	CSE7: The Green and Blue Infrastructure Network
CSE5: Great Western Community Forest	CSE8: Great Western Community Forest
CSE6: Trees	CSE9: Woodland, Trees and Hedgerows
CSE7: Landscape and Areas of Non-Coalescence	CSE10: Landscape

CSE8: Biodiversity, Geodiversity and Nature Recovery	CSE11: Biodiversity, Geodiversity and Nature Recovery
CSE9: Managing Flood Risk	CSE12: Managing Flood Risk
CSE10: Unstable Land	CSE14: Unstable Land
CSE11: Contaminated Land	CSE15: Contaminated Land
CSE12: Reducing Noise and Pollution	CSE16: Pollution
SP7: Healthy Living	Deleted
HL1: Health Impact Assessment	HL1: Health Impact Assessment
HL2: Protecting Open Spaces	HL3: Protecting Open Spaces, Sports and Recreational Facilities
HL3: Open Space in New Developments	HL4: Open Space in New Developments
HL4: Child Friendly Places and Play	HL5: Child Friendly Places and Play
HL5: Community Infrastructure	HL6: Community Facilities
U1: Wastewater, Sewage Infrastructure and Water Supply	INF2: Wastewater, Sewage Infrastructure and Water Supply
U2: Digital Connectivity and Telecommunications	INF3: Digital Connectivity and Telecommunications
U3: Energy Networks	INF4: Energy Networks
D1: Developer Contributions and Viability	INF1: Infrastructure and Developer Contributions

Chapter 1: Introduction

Summary of main issues raised:

No main issues were raised for this chapter.

Chapter 2: Our Vision and Objectives

Summary of main issues raised:

Respondents generally supported the Plan's vision and objectives, including the proposed revitalisation of the town centre, with support also expressed by Wiltshire Council.

Some respondents requested amendments to the vision and objectives, including greater clarity on how housing needs will be met throughout the plan period, including market and affordable housing provision and maintaining a five-year housing land supply; how Swindon will achieve net-zero targets; and who will be responsible for delivering each objective.

Several development sector respondents raised concerns that delays to the plan-making process could result in the plan period falling below the 15 years required by national policy and recommended extending the plan end date.

Natural England supported the Plan's strategic objectives but suggested expanding the vision and objectives to strengthen commitments to safeguarding and enhancing the environment and to better articulate the plan's environmental ambitions.

How the main issues were taken into account:

The Plan's vision has been reviewed and expanded and now provides greater detail on the ambition for growth, infrastructure, and the environment. The vision has also been extended to cover up to 2060 to reflect the long-term scale of delivery of some allocated sites.

The Strategic Objectives have been reviewed to improve clarity of language. SO3 focusses on providing the right kinds of housing to meet all needs and SO6 aims for new buildings to be net zero ready.

The emerging Local Plan continues to cover a period up to 2043. PINS' [pre-examination checklist](#) is clear that "it should be assumed that the plan will be adopted no earlier than one year after the date on which it is submitted for examination, and that the 15-year period starts on the 1 April following the date of adoption". As the emerging Plan is planned for submission in December 2026, the start of the plan period is assumed from 1 April 2028, and an end date of 2043 would provide 15 years.

Regulation 19 Policies SS1: Spatial Strategy, SDA01 – SDA13 (Site allocations), and HC1: Housing Requirement detail how the Plan will meet the housing requirement over the plan period.

Chapter 3: A Swindon Portrait

Summary of main issues raised:

Respondents generally agreed with the strengths, opportunities and challenges identified in this chapter. Some respondents also highlighted typographical errors or requested clarification on certain facts.

How the main issues were taken into account:

Please note, “Chapter 3: A Swindon Portrait” presented in the Reg 18 Consultation Draft, has been merged and replaced with Paragraphs 2.1 - 2.8 of “Chapter 2. Our Vision and Objectives” in the Regulation 19 Publication Version. This was to improve the structure and clarity of the Plan.

The typos mentioned have been corrected and factual statements clarified.

Chapter 4: The Spatial Strategy and Strategic Area Policies

Policy SS1: Swindon’s Spatial Approach to Growth

Summary of main issues raised:

Respondents broadly supported the spatial strategy, including its focus on town centre regeneration, urban intensification and directing growth towards Strategic Growth Locations. This approach was supported by Historic England, South Oxfordshire District Council, Vale of White Horse District Council and Oxfordshire County Council.

However, a significant number of respondents raised concerns regarding the deliverability of the strategy. In particular, respondents highlighted viability challenges affecting development within the Town Centre and wider Swindon urban area, and questioned the heavy reliance on Strategic Growth Locations, citing the complexities associated with multiple landownerships, substantial infrastructure requirements and the timescales needed to bring large sites forward. As a result, many respondents from the development sector, particularly planning agents, argued that the Plan should allocate additional sites, including smaller sites, to provide greater flexibility and resilience in housing delivery. Some respondents also advocated a greater role for Rural Service Centres and smaller settlements in accommodating future growth.

Respondents also sought greater clarity regarding the operation and presentation of the spatial strategy. A small number suggested that Policy SS1: Swindon’s Spatial Approach to Growth should explicitly set the Plan’s housing requirement. Others

highlighted inconsistencies in terminology and requested clarification regarding the relationship between Policy SS1, the key diagram and the Sustainable Growth Corridors shown on the draft Policies Map; between Policy SS1 and the "Other Allocations" identified in Appendix 1; and between Policy SS1 and Policy SS2, particularly in relation to the role of Rural Service Centres.

Several respondents considered that the policy should establish a clearer hierarchy for directing development. Suggestions included prioritising Swindon Town Centre ahead of the wider urban area, treating Strategic Growth Locations as equivalent in status to the wider urban area, and explicitly incorporating Rural Service Centres within the policy framework.

Respondents also commented on related aspects of the spatial strategy. Some queried the justification for the approach to employment land, arguing that greater flexibility should be provided to allow residential or mixed-use redevelopment of industrial sites where appropriate. Others suggested that the strategy should place greater emphasis on the role of brownfield land in meeting development needs. Several respondents additionally noted that the reference to "local character" in Clause 2 lacks clarity and would benefit from further explanation.

Finally, National Highways sought greater clarity regarding the terminology used throughout the Plan to describe housing supply and how housing delivery is presented within the spatial strategy. Overall, while respondents generally supported the broad direction of growth proposed, they sought greater clarity, flexibility and confidence in the deliverability of the strategy and its supporting policies.

How the main issues were taken into account:

The spatial strategy has been reviewed and strengthened in response to representations and the updated evidence base. The Regulation 19 policy provides greater clarity on how growth will be distributed across the Borough, prioritising the Central Area and wider urban area, comprehensively planned new communities, and proportionate growth at Rural Service Centres and larger villages.

In response to concerns regarding deliverability, the Council reviewed the availability, suitability and achievability of sites, including additional sites promoted through the Call for Sites. Further brownfield and greenfield sites have been allocated, providing a broader range of development opportunities. Brownfield allocations support the Plan's sustainability objectives, while additional greenfield sites help diversify housing supply, including sites with fewer abnormal costs or complex delivery requirements.

The policy also places greater emphasis on making effective use of previously developed land and provides flexibility for supplementary development where

appropriate to the settlement hierarchy and where this would not undermine site allocations or the overall spatial strategy.

The relationship between the different elements of the spatial strategy has been clarified, including the role of Strategic Development Areas, Rural Service Centres, key transit corridors and employment areas. Terminology has also been updated to improve consistency across the Plan and Policies Map.

The approach to employment land has been refined to direct new industrial and warehouse development to appropriate locations while supporting the intensification of existing employment areas according to their accessibility. The housing requirement and sources of housing supply are addressed separately through Policy HC1 and the supporting housing evidence.

Policy SS2: Settlement Hierarchy

Summary of main issues raised:

Respondents generally supported the Settlement Hierarchy, including strong support for the designation of Highworth and South Marston as Rural Service Centres. Several respondents, particularly from the development sector, considered that the hierarchy should make a stronger contribution to delivering housing growth by recognising the development potential of settlements such as Highworth, Wroughton and North Tadpole. Respondents argued that Rural Service Centres, as the second tier of the hierarchy, should play a greater role in accommodating growth over the plan period and that additional development in larger and smaller villages could help support housing delivery. Some respondents also highlighted the benefits of rural allocations for delivering smaller sites and supporting SME builders.

A recurring theme was the need for greater flexibility in Policy SS2. Several respondents recommended that the policy should support sustainable development adjacent to settlement boundaries and acknowledge that settlements can grow and expand their range of services through new development. As a result, respondents argued that existing service provision should not be the sole determinant of where growth is directed. In relation to Wroughton in particular, respondents considered that the policy should better reflect its sustainability credentials, range of services and facilities, and potential role in accommodating strategic growth.

Respondents also sought greater clarity regarding the relationship between the Settlement Hierarchy and the wider spatial strategy. Concerns were raised that Policies SS1 and SS2, and Table 1, were not fully aligned, particularly in relation to the policy status of the Town Centre and Central Area. Some respondents considered that the hierarchy did not clearly explain how it relates to the Spatial Approach set out in Policy SS1, while others argued that the importance of the

Central Area in accommodating and diversifying growth should be more clearly reflected. Several respondents also recommended amendments to the wording of Policy SS2 to improve its clarity and effectiveness, including references to housing allocations elsewhere within the Borough.

A number of representations focused on the classification of individual settlements within the hierarchy. Development sector respondents objected to the classification of Redlands as a Larger Village, arguing that it should instead be considered in the context of the wider New Eastern Villages (NEV) development and, in the longer term, the Swindon Urban Area. Other respondents suggested that North Tadpole should be classified either as part of the Urban Area or as a Rural Service Centre. Further comments questioned the classifications applied to a number of settlements associated with the NEV and whether they appropriately reflected their function and relationship with surrounding communities.

Stagecoach West and Swindon's Bus Company raised broader concerns regarding the robustness of the Settlement Hierarchy, arguing that it does not adequately reflect the evidence base or effectively support the Plan's objectives. They suggested that the hierarchy should better recognise how settlements will evolve through committed and future development, more clearly align with the hierarchy of town centres and village places set out in Policy FE3 and explicitly indicate the relative sustainability of settlements to guide decisions on the suitability of locations for future growth. They also recommended that the hierarchy should form part of the formal wording of Policy SS2.

In addition, Stagecoach West and Swindon's Bus Company objected to the treatment of the NEV within the hierarchy, recommending the removal of references to the NEV and its constituent villages. They also challenged the classification of several settlements, including Lotmead and Great Stall East as Rural Service Centres, on the basis that they do not meet needs arising beyond the village itself, and suggested that Great Stall East, Lotmead, South Marston and Rowborough should be removed from the Rural Service Centre category. They further recommended the removal of Foxbridge and Redlands from the Large Village category, arguing that they do not function as self-contained settlements.

How the main issues were taken into account:

Respondents generally supported the policy but raised concerns regarding the role of Rural Service Centres, emerging settlements, the relationship between the Settlement Hierarchy and the spatial strategy, and the clarity and effectiveness of the policy. These issues have been taken into account in preparing the Regulation 19 version of the Plan. The policy has been revised to provide greater clarity on the role and function of settlements and how the Settlement Hierarchy supports the delivery

of the spatial strategy set out in Policy SS1. The revised policy also provides a clearer framework for directing the scale and distribution of development, considering the role of each settlement, the availability of services and facilities, accessibility and settlement character. It also recognises that the role of some settlements will evolve as planned development is delivered.

The role of the Central Area has been more clearly reflected by including it as a separate tier within the Settlement Hierarchy shown in Table 1. This recognises its role as the primary commercial, cultural and transport hub at the core of Swindon and its identification as a key focus for regeneration and improvement.

The concerns around Rural Service Centres have also been addressed, with Highworth and Wroughton retained in this category alongside Tadpole Garden Village as a new addition. To ensure the settlement hierarchy reflects the status of settlements at the start of the plan period and to maintain consistency, all settlements identified in Table 1 have a defined settlement boundary on the Policies Map. The policy has also been amended to provide greater clarity regarding settlement boundaries and the approach to development outside defined settlements. The policy sets out where development within settlement boundaries will be supported and highlights that all areas outside of the settlements identified in the hierarchy will be considered Open Countryside.

Policy SGL01: Swindon's Central Area

Summary of main issues raised:

Respondents generally supported the identification of the Central Area as a Strategic Growth Location and its role as a focus for regeneration. Several major landowners within the Central Area argued that an even greater emphasis should be placed on growth and redevelopment in the area to maximise regeneration opportunities and support delivery.

There was also broad support for the transport role of the Central Area. Stagecoach West and Swindon's Bus Company welcomed its function as a key transport gateway and interchange, as well as the policy approach of directing additional mixed-use development, including office and residential uses, into the area. Other respondents supported measures to improve active travel infrastructure and strengthen connections with the wider cycling network.

Respondents generally supported the integration of green and blue infrastructure within the regeneration of the Central Area. The Environment Agency, Natural England and a local Councillor advocated a stronger policy approach to green infrastructure, including the incorporation of Natural England's Green Infrastructure Standards. Other comments sought clarification on the proposed housing mix, with one respondent questioning how a focus on one and two-bedroom homes aligns with the Borough's wider housing needs, while views on tall buildings were mixed. Although a number of respondents, including a key landowner, supported the

development of tall buildings, concerns were also raised regarding their viability and deliverability.

Viability and deliverability emerged as the principal concern raised by respondents, particularly those representing the development sector and land interests outside the Central Area. Respondents argued that historic rates of redevelopment demonstrate longstanding viability challenges and should therefore inform assumptions about future delivery. Concerns were expressed that projected delivery rates within the Central Area are overly optimistic and that the Plan is overly reliant on Central Area sites to meet housing requirements. Consequently, several respondents argued that the anticipated contribution of Central Area sites to housing delivery should be reduced and that additional contingency should be built into the Plan through the allocation of further sites to mitigate the risk of under-delivery.

How the main issues were taken into account:

Please note, “Policy SGL01: Swindon’s Central Area”, presented in the Reg 18 Consultation Draft, has been recoded to “Policy SDA01: Swindon’s Central Area” in the Regulation 19 Publication Version.

We acknowledge the support expressed for Policy SG01: Central Area, particularly for retaining the Central Area as a strategic growth location and maintaining its regeneration as a major component of the Local Plan’s spatial strategy. This approach has been retained in the Reg 19 Plan, with Policy SDA01 continuing to provide a strategic framework for regeneration and redevelopment. The policy identifies a significant programme of development within the area. Several sites have been allocated to contribute toward meeting the Borough’s development needs. Sites CA01-CA11 are allocated to deliver at least 3,800 new homes throughout the plan period, while CA12-CA14 are identified as aspiration sites that could contribute at least a further 1,200 homes toward the longer-term aspiration for approximately 8,000 new homes and 6,000 new jobs.

We acknowledge the representations from landowners seeking greater prominence for the Central Area within the Local Plan, including the view that its role as a strategic growth and regeneration location should be more strongly reflected. The Reg 19 Plan gives emphasis by explicitly describing the “fundamental role” of the area in the Borough’s overall spatial strategy, with an ambition to “transform the area to deliver a place that looks and functions as the urban heart of Swindon.” Additionally, as stated above, the policy identifies a significant number of sites for development, demonstrating the continued emphasis placed on the area as a location for growth and regeneration. CA15: Newburn Sidings has been introduced as an additional allocation, intended for 262 homes on vacant brownfield land, providing a further opportunity to bring previously developed land into productive use. Alongside this, we have strengthened the supporting framework for development. The Strategy Context and Infrastructure Requirements section of Policy SDA01 explicitly requires development proposals to deliver upon the

ambitions of the 2025 Heart of Swindon Vision Document, and to deliver or contribute toward the necessary infrastructure identified through the Infrastructure Delivery Plan. This includes transport and active travel improvements, upgrades to Swindon Station and the northern access and south-side public transport interchange, education provision, healthcare, green infrastructure, water, wastewater and energy infrastructure, and community, sports and leisure facilities. The successful delivery of this growth and regeneration will require landowners and other relevant stakeholders to work collaboratively with the Council to bring forward the identified sites and support the comprehensive redevelopment of the Central Area.

Furthermore, we recognise representation from Stagecoach West and Swindon Bus Company for the Central Area to function as an important transport gateway and interchange, alongside comments supporting improvements to walking and cycling networks. Within the Central Area, Policy SDA01 identifies specific requirements for improving public transport infrastructure, particularly upgrades to Swindon Station, the northern access project and the south-side public transport interchange, as well as improvements to walking and cycling routes and the historic street network.

Policy ST1: Spatial Vision supports a vision-led approach to transport, which identifies improving connectivity to Swindon Town Centre and strengthening bus and active travel routes as priorities, building on the opportunities provided by the new Flemming Way public transport interchange. Policy St2: Promoting Sustainable Transport and Policy ST3: Accessibility and Development support the provision of sustainable, safe and accessible connections between development and the wider transport network. Meanwhile, Policy ST4: Transport and Infrastructure Design provides a framework for ensuring that development contributes to well-designed and connected transport infrastructure and supports the preparation of a coherent street network. Finally, Policy ST5: Improving Public Transport further supports improvements to the public transport network and interchange facilities. Taken together, these provide a strong framework for improve routes into and through the Central Area, strengthening connections between development sits.

We accept the recommendation from the Environment Agency, Natural England and local councillors that green and blue infrastructure be better integrated into the Central Area and recognise the importance of ensuring that regeneration contributes to the quality and connectivity of the wider green infrastructure. In response, the Reg 19 Plan retains and strengthens the policy framework for achieving this. In particular, Policy SDA01 now explicitly identifies green infrastructure and open space within the infrastructure requirements for the Central Area, alongside requirements for development to deliver and/or contribute toward necessary infrastructure, as identified in the Infrastructure Delivery Plan and other relevant evidence, including forthcoming. This sits alongside policies CSE6: Green Infrastructure in New Developments and CSE7: Green and Blue Infrastructure Network, which provide the wider framework for incorporating green and blue infrastructure through development and protecting and enhancing current networks. The Reg 19 Plan is informed by the

2024 Green Infrastructure Strategy, which gives the evidence base for identifying opportunities and priorities for these networks. We recognise that some aspects of detailed green infrastructure delivery are more appropriately addressed through the Green Infrastructure Strategy and under the remit of Development Management, but consider that the Reg 19 Plan provides the appropriate strategic policy framework for ensuring that regeneration of the Central Area incorporates and contributes to green and blue infrastructure where appropriate.

We recognise questions raised regarding the housing mix within the Central Area and the importance of ensuring that the Plan provides a range of housing opportunities. We consider that an appropriate mix of housing will vary depending on the characteristics, capacity, accessibility and context of individual sites. The Reg 19 Plan considers the Central Area as one constituent part of the wider site allocation portfolio, which collectively provides opportunity for a variety of housing types, sizes, densities and tenure appropriate to the area. Within the wider spatial strategy, the Central Area has been identified as having a particular role in making efficient use of its highly sustainable and previously developed urban location, while contributing to the Borough's overall housing requirements.

We acknowledge support offered for the potential for development tall buildings and their potential to contribute toward both efficient use of land and regeneration, while also understanding the viability concerns associated with such development. Policy SD5: Tall Buildings provides a framework for considering tall buildings where appropriate, with the Glossary providing a definition of tall buildings and the policy having regard to factors including the character and context of the area, townscape, heritage, design, views and the relationship with surrounding development. The Plan covers a long period ending in 2043 and therefore identifies the scope and opportunity for tall buildings without assuming or mandating that they must or will necessarily come forward. The policy does not require tall buildings but allows for them to be considered where appropriate and feasible. Viability considerations have also been taken into account in establishing the capacity of Central Area sites, including the viability implications associated with taller forms of development, and this work has informed the capacity outputs used in the Plan.

Furthermore, we recognise concerns raised regarding the viability and deliverability of development within the Central Area, including the view that past rates of redevelopment indicate challenges to delivery, as well as the apprehension that the plan may place too much reliance on Central Area sites to meet housing requirements. We understand that delivery of Central Area sites will be influenced by a variety of factors, including viability, market conditions, land assembly and the complexity of bringing forward large brownfield regeneration sites. In preparing the Reg 19 Plan, viability and deliverability have been considered extensively through collaboration with developers, landowners and other relevant stakeholders, evidence supporting site allocations and the overall housing trajectory. The Plan does not rely solely on the Central Area to meet housing requirements. The site allocation portfolio

provides a range of sites across the Borough and includes sites of varied scale, location, capacity, and tenure, providing a more balanced supply of housing over the plan period. Nonetheless, the Central Area has a unique and important role in the spatial strategy due to the scale of its regeneration opportunities and potential to make efficient use of previously developed land in a highly sustainable location.

We acknowledge the suggestion that past delivery rates should be used as a basis for projecting future delivery. In response, we consider that historic rates alone would not reflect the significant regeneration opportunities identified through the Reg 19 Plan, or the changes anticipated over the longer plan period. Delivery assumptions have therefore been informed by evidence available for individual sites and the circumstances affected their delivery. We also recognise the request for additional contingency to address potential non-delivery of Central Area sites. The Plan's housing supply is considered through the overall site allocation portfolio and housing trajectory, rather than assuming that every site will deliver at the same rate or at the same point in the plan period. This approach provides a range of sites to contribute toward housing delivery while retaining the Central Area's identified role in supporting the Borough's overall housing requirements.

Policy SGL02: New Eastern Villages (NEV)

Summary of main issues raised:

Respondents expressed mixed views on the New Eastern Villages (NEV) Strategic Growth Location. While support was received for the continued allocation of the NEV and the inclusion of specific sites within it, a number of respondents questioned the robustness of the wider spatial strategy due to its reliance on the delivery of large strategic sites, particularly the NEV. Concerns regarding deliverability focused on the complexity of land ownership, the need for significant supporting infrastructure and the constraints posed by flood risk. One respondent sought amendments to the Policies Map to include an omission site and argued that infrastructure requirements should be addressed at the planning application stage.

A significant number of responses focused on the potential cross-boundary and local impacts of growth within the NEV. Parish councils, neighbouring authorities and other stakeholders highlighted both opportunities and concerns arising from development. Opportunities included improved bus connectivity and enhanced digital infrastructure, while concerns related to the effects of growth on wildlife, light pollution, traffic levels, flood risk and pressure on existing services and facilities. Local councillors identified additional development parcels that could come forward within the wider allocation area and emphasised the need to address flood risk, provide sufficient school infrastructure, protect areas of rural character, including Nightingale Lane, and update the NEV prioritisation matrix.

Transport was a key theme raised by respondents. Stagecoach West and Swindon's Bus Company acknowledged the scale and significance of the proposed development but raised concerns regarding the phasing and build-out of the NEV, and whether the proposed layout, route network and design approach would effectively support bus use. Concerns were also expressed that the predominance of owner-occupied housing and reductions in affordable housing provision could negatively affect future bus patronage. Several respondents emphasised the importance of delivering strong active travel and green infrastructure links between the NEV, surrounding communities and the Central Area, with particular concern raised about the severance effect created by the A419. National Highways highlighted the need for continued engagement regarding the potential impacts of the proposed scale of development on the Strategic Road Network.

Respondents also expressed differing views on the proposed Area of Non-Coalescence. One respondent sought amendments to reduce its extent and exclude part of an omission site, while Broughton Parish Council sought its expansion to provide greater protection for Broughton village and maintain separation between settlements.

Environmental considerations featured prominently within responses. Natural England highlighted the importance of retaining Ancient Woodland, while the Environment Agency and Broughton Parish Council called for a Level 2 Strategic Flood Risk Assessment and stronger policy provisions to address flood risk associated with the nearby river corridor. In addition, support was expressed for safeguarding the route of the proposed Wilts and Berks Canal as part of the long-term planning of the area.

How the main issues were taken into account:

Please note, "Policy SGL02: New Eastern Villages", presented in the Reg 18 Consultation Draft, has been recoded to "Policy SDA07: New Eastern Villages" in the Regulation 19 Publication Version.

We understand concerns regarding the robustness of the spatial strategy, and its perceived predication on large strategic sites such as those in the New Eastern Villages. We also understand associated concerns raised regarding the deliverability of these sites. While the New Eastern Villages (NEV) are a significant component part of the Borough's planned growth, they form just one of several strategic growth locations through which the spatial strategy will be delivered, with development anticipated across all sites in a phased manner across the plan period. Following Reg 18 Consultation, a substantial proportion of the NEV housing yield has progressed through the planning system and now benefits from planning permission, with development having commenced on a number of sites and parcels. The Reg 19

Plan therefore reflects a more advanced position in terms of delivery of the NEV. The sites and allocations considered through the Plan have been assessed through the Strategic Housing Land Availability Assessment (SHLAA), including consideration of their suitability, availability, and achievability, with sites less constrained and viewed to be better aligned with the spatial strategy informing the overall allocation approach. The infrastructure requirements for the NEV have also been considered through the Infrastructure Delivery Plan and associated infrastructure and risk-management work, recognising the importance of ensuring that growth is supported by the infrastructure necessary for its delivery.

We acknowledge the representation seeking amendments to the Policies Map, and the view that infrastructure requirements should instead be determined through individual planning applications. The Reg 19 Plan retains the strategic allocation of the NEV and identifies the infrastructure requirements necessary to support its planned growth. We recognise that the precise form, timing, and delivery of some infrastructure will need to be established through the planning application and development management process as individual sites and parcels come forward. However, part of the purpose of the Local Plan is to provide a clear strategic framework for the scale and infrastructure requirements associated with the NEV, to ensure that these matters can be considered alongside the growth rather than only at the application stage. The specific site promoted through this representation has been considered through the SHLAA and wider spatial strategy, alongside the other sites assessed through the plan-making process.

We acknowledge representations from a variety of parties, including Shrivenham Parish Council, the Vale of White Horse Oxfordshire County Council and South Oxfordshire District Council and Broughton Parish Council, regarding the potential impacts of NEV growth on neighbouring areas, including on transport, local services, wildlife, light pollution and flood risk. We recognise that the proposed scale of development in the New Eastern Villages has the potential to create both impacts and opportunities beyond the immediate allocation area. A number of NEV schemes already hold planning permission, and, through the planning application process, mitigation measures have been identified to address the impacts of development. Moreover, we agree with the potential of planned NEV development to improve services and infrastructure and address existing service gaps. This has informed both the Infrastructure Delivery Plan and discussions with relevant infrastructure providers, particularly in relation to education provision. Sites and development opportunities put forward through consultation have been considered through the SHLAA and wider spatial strategy, with the Plan seeking direct growth toward locations where it can be appropriately accommodated.

We understand the concerns raised by local councillors regarding additional development parcels, flood risk, school infrastructure and the protection of areas retaining a strong rural character, including Nightingale Lane. We recognise the importance ensuring that any development within the NEV is considered in the

context of the overall allocation, its infrastructure requirements and the character of the adjoining area. We further recognise that that the scale of development proposed may result in change to the existing landscape and settlement pattern, and that new development must be carefully managed to ensure it responds appropriately to the character of the area.

The Reg 19 Plan continues to recognise the importance of maintaining a clear distinction between new development and existing villages and rural areas, including through the retention of the area of non-coalescence. The Reg 19 Plan retains the strategic approach to the NEV and its phased delivery, with development proposals required to have regard to the relevant site-specific and wider policy requirements. The additional sites and parcels raised through consultation have been considered through the SHLAA and plan-making process, rather than being incorporated solely based on their potential. Concerns regarding infrastructure and local character have therefore been taken into account alongside the wider suitability and deliverability considerations informing the plan.

We acknowledge the representations from Stagecoach West and Swindon Bus Company regarding the importance of ensuring that the scale, phasing and layout in the NEV support effective bus services. We recognise that the arrangement of main routes, buildings, and development phases will be important in creating a successful public transport network. These representations have informed the Plan's transport vision, including the identification of key transit routes and the need to strengthen connections between the NEV, Central Area, and wider Borough. The Reg 19 Plan's transport policies, together with the Green Infrastructure Strategy and Local Cycling and Walking Infrastructure Plan, provide a framework for integrating the NEV with existing and proposed active travel corridors and the wider green infrastructure and movement networks.

Furthermore, we acknowledge National Highways' request for continued engagement regarding the potential impact of the proposed additional quantum of development at the NEV on the Strategic Road Network. We recognise that the scale of growth proposed requires the effects on the wider highway network to be carefully considered. The development quantum has been tested through transport modelling as part of the evidence supporting the Reg 19 Plan. Moreover, the Plan has retained the requirement for development proposals to address their transport impacts through transport assessment and infrastructure requirements. Continued engagement with National Highways will remain important as individual sites progress through the planning process.

We recognise the representations regarding the extent of the NEV area of non-coalescence, including the request for the boundary to be amended to exclude part of a promoted site and the request from Broughton Parish Council for the area to be extended to provide additional protection to the village. As stated above, we understand the importance of maintaining a distinction between the NEV and

surrounding rural settlements and the role of the area of non-coalescence in protecting the distinct identity and character of those settlements. The Reg 19 Plan therefore retains the principle and boundary of the area of non-coalescence. The sites promoted through consultation have been considered through the SHLAA and wider spatial strategy, including their relationship with the existing settlement pattern.

We acknowledge Natural England's representation regarding the presence of Ancient Woodland within the NEV and the importance of its retention. In response, the Reg 19 Plan retains the protection of Ancient Woodland through the wider policy framework for trees, woodland and biodiversity, particularly in Policy CSE9: Woodland, Trees and Hedgerows. The NEV site allocations have been considered through the evidence supporting the Plan, with Ancient Woodland and other environmental constraints taken into account in assessing the suitability of site and ensuring the Ancient Woodlands are subject to relevant protections.

Additionally, we acknowledge representations from the Environment Agency and Broughton Parish Council regarding the need for further consideration of flood risk, including the request for a Level 2 Strategic Flood Risk Assessment and additional policy provisions relating to the nearby river. We understand that flood risk is an important consideration for the NEV given the scale of development and presence of areas affected by flood risk. Through preparation of the Reg 19 Plan, the NEV have been subject to a Level 2 Strategic Flood Risk Assessment, which has informed the wider policy and ensures any development proceeds with regard to potential risks.

Finally, we acknowledge the support for safeguarding the proposed Wilts and Berks Canal Route. The Reg 19 Plan continues to safeguard the proposed route of the Canal, recognising the importance of protecting the opportunity for the route to be delivered in the future.

Policy SGL03: Kingsdown

Summary of main issues raised:

Respondents highlighted a range of infrastructure, transport and environmental matters that should be addressed as part of the site's development. One respondent emphasised the need for supporting infrastructure to be delivered alongside development, including the provision of a new GP surgery.

Views differed regarding the need for an Area of Non-Coalescence. While one respondent supported the designation of an Area of Non-Coalescence around Kingsdown, other respondents, including Stagecoach West and Swindon's Bus Company, supported a more comprehensive approach to planning the wider area. These respondents argued that additional development could help create more coherent and legible movement routes, improve connectivity across the area and support enhanced bus provision within what is currently considered a gap in the public transport network.

Transport infrastructure was identified as a key issue, with National Highways, Stagecoach West and Swindon's Bus Company all stressing the importance of delivering a bridge across the A419 as a critical component of a comprehensive development scheme. Respondents considered this infrastructure essential to ensuring effective connectivity and integration between communities.

Environmental matters were also raised by statutory consultees. Natural England identified a number of areas with potential ecological value and recommended that Phase 1 habitat surveys be undertaken to inform future development proposals and ensure that wildlife interests are appropriately considered. The Environment Agency sought additional policy provisions aimed at protecting and maintaining water quality as part of the development process.

How the main issues were taken into account:

Please note, "Policy SGL03: Kingsdown", presented in the Reg 18 Consultation Draft, has been recoded to "Policy SDA08: Kingsdown" in the Regulation 19 Publication Version.

We acknowledge the representations made regarding the need for supporting infrastructure to be delivered alongside development at Kingsdown, including the request for a new GP surgery. We recognise that delivery of appropriate infrastructure is important to ensuring that growth at Kingsdown is supported by the services and facilities needed by the existing and future communities. Infrastructure requirements stemming from the planned growth in this area are being identified through the Infrastructure Delivery Plan, and although a new GP surgery has not been explicitly allocated in the Reg 19 Local Plan, the request has been communicated to the relevant health authorities. The Reg 19 Plan therefore retains our strategic approach to infrastructure provision, with details regarding scale, timing and delivery of individual infrastructure requirements to be established as development comes forward.

We recognise the differing representations regarding the area of non-coalescence around Kingsdown. We understand the importance of maintaining an appropriate relationship between new development and the surrounding settlements and countryside, while also recognising the opportunity for development in this area to improve connectivity and address existing gaps in the transport network. The Reg 19 Plan retains the area of non-coalescence around Kingsdown, while also identifying and scoping a sequence of sites across the wider area where development can help contribute to the creation of more legible routes and improved public transport connections. This approach reflects the need to balance the protection of settlement identity and local character with the opportunity to create a better-connected area and support improvisation bus provision in a location currently identified as a network gap.

Furthermore, we acknowledge representations from National Highways, Stagecoach West and Swindon's Bus Company regarding the importance of delivering a bridge across the A419 as part of a comprehensive development scheme. We recognise that this bridge is important to achieving the connectivity required to integrate the Kingsdown development with the wider area. It therefore remains part of our transport strategy in the Reg 19 and forms a crucial element of an identified transit corridor.

We understand Natural England's comments regarding areas within and around Kingsdown which may provide opportunities for wildlife, as well as the recommendation that Phase 1 Ecological Surveys are undertaken where appropriate. We recognise the importance of understanding ecological constraints and opportunities throughout the planning process. Phase 1 Ecological Surveys have been undertaken as part of the Reg 19 Plan production, providing further evidence to inform the assessment of the area and consideration of ecological matters as sites and parcels progress through the planning process. The Reg 19 Plan also retains and makes more comprehensive the policy framework for protecting and enhancing ecological networks through Policies CSE6 – CSE10. These policies provide for the retention and enhancement of important ecological features, green and blue infrastructure connections, trees and woodland, and landscape character, as appropriate. We therefore consider that the ecological matters raised through consultation are appropriately addressed through the combination of the site assessment work, ecological surveys and the wider policy framework.

We acknowledge the Environment Agency's comments regarding the protection of water quality and the need for the Plan to address the potential impacts of development on the water environment. In response, the Reg 19 Plan has strengthened its policy approach to water quality through the introduction of Policy CSE13: Protection and Enhancement of the Water Environment. The Policy ensures that planning permission will only be granted for development proposals which will not have an adverse impact on the functions and condition of a watercourse and its associated corridor, and requires development to conserve and enhance biodiversity, landscape and recreational value of watercourses and incorporate opportunities to deliver Water Framework Directive objectives. The policy also introduces requirements for 10-metre buffer zones alongside watercourses, long-term management of these areas and opportunities to enhance the physical habitat of watercourses. In addition, Policy CSE16: Pollution has been strengthened to address impacts on the water environment and Policy INF2: Wastewater, Sewage Infrastructure and Water Supply requires development to demonstrate adequate water supply and sewerage infrastructure capacity, including the delivery of necessary infrastructure upgrades before occupation where required. These changes provide a more explicit policy framework for protecting and enhancing water quality and managing the potential effects of development on the water environment.

Policy SGL04: Wichelstowe

Summary of main issues raised:

Respondents raised a range of infrastructure, transport and environmental matters in relation to the proposed development. One respondent highlighted the importance of delivering supporting infrastructure alongside development, including the provision of a new GP surgery.

Differing views were expressed regarding the need for an Area of Non-Coalescence. One respondent considered that an Area of Non-Coalescence should be established around Kingsdown to maintain separation from surrounding development. In contrast, other respondents, including Stagecoach West and Swindon's Bus Company, supported a more comprehensive approach to planning the wider area, recognising the benefits that additional development could bring in improving connectivity across the area. In particular, they highlighted the opportunity to create more legible movement routes and strengthen bus provision within what is currently regarded as a gap in the public transport network.

Transport infrastructure was a key issue raised by respondents. National Highways and Stagecoach West and Swindon's Bus Company emphasised the critical importance of delivering a bridge across the A419 as part of a comprehensive development scheme. Respondents considered that the bridge would play a fundamental role in enabling connectivity, integrating development on either side of the corridor and supporting the overall functioning of the site.

Environmental considerations were also raised by statutory consultees. Natural England identified several areas that may support wildlife and advised that Phase 1 habitat surveys should be undertaken to inform the future development of the site and identify any ecological constraints. The Environment Agency sought the inclusion of additional policy wording relating to the protection and enhancement of water quality as part of future development proposals.

How the main issues were taken into account:

Please note, "Policy SGL04: Wichelstowe", presented in the Reg 18 Consultation Draft, has been recoded to "Policy SDA06: Wichelstowe" in the Regulation 19 Publication Version.

We acknowledge the continued support for the continued allocation of Wichelstowe, including from the Landowners and Development Consortium, as well as Stagecoach West and Swindon's Bus Company. We also acknowledge the representations regarding the requirement for a further three-form-entry primary school, particularly where a site has already been identified and progressed through the planning process. The Reg 19 Plan retains this requirement, with infrastructure

requirements being considered through the Infrastructure Delivery Plan where additional pupil yield has been identified. Where development parcels have already been granted planning permission and their development approach and associated infrastructure provision established through the planning process, this will be considered determining infrastructure requirements for the remaining parcels. The remaining development parcels will need to have regard to the updated Infrastructure Delivery Plan and any requirements identified through it.

We recognise National Highway's comments regarding the proximity of Wichelstowe to M4 Junction 16 and the mitigation works already delivered, as well as the importance of continued collaboration between Wiltshire Council, Swindon Borough Council, and National Highways themselves to maximise sustainable transport opportunities. The Reg 19 Plan recognises the role of the Wichelstowe Southern Access Road in improving connectivity and helping to reduce pressure on Junction 16 and the wider highway network. Policy SDA06 identifies a transit route within the transit vision. It also identifies further improvements to the M4 Junction 16, including the Wichelstowe Southern Access/M4 J16 Link, M4 J16 slip-road and A3102 junction works. We continue to work with Wiltshire Council and National Highways, particularly regarding Junction 16 of the M4, with transport modelling being used to understand the capacity of the strategic and local highway network and implications of planned growth. Our supporting transport work and evidence and the Infrastructure Delivery Plan will inform the need for any additional mitigation measures required to support delivery.

We acknowledge the representations from Stagecoach West and Swindon's Bus Company regarding the importance of integrating bus services and active travel through Wichelstowe and providing connections into Swindon and beyond. This feedback has been useful and informed our approach to the transport vision and have helped inform our ongoing work with developers and infrastructure providers regarding the detailed routing and circulation of bus services and active travel connections through the development toward Swindon Town Centre. We recognise that successful integration of the development will depend on the delivery of routes and infrastructure that support sustainable travel and enable effective bus circulation through the growth area. The Reg 19 Plan therefore retains sustainable transport and green infrastructure as key components of the Wichelstowe strategy in particular policy SDA06. This is supported by the wider transport strategy found in Chapter 7: Well-Connected, Sustainable Transport.

Policy SGL05: East Wroughton

Summary of main issues raised:

Representations were made by all landowners within the proposed East Wroughton growth area. Landowners holding parcels in the north and south of the growth area set out their support for bringing forward residential-led schemes whilst the landowner of the central parcel wrote to confirm the land was no longer available.

Many representations were also made by local residents and councillors. The key themes emerging were around concerns over the impact of new homes on village character and the identity of Wroughton as separate to Swindon; the impact of new homes on the functioning of local services including schools, doctors and dentists; additional car usage and the impact on local roads; and the impact of development of greenfield sites on wildlife, food production and flooding. In addition, a desire to see better local shops and employment was raised along with the request to see new housing help towards providing for key workers and older people to aid downsizing.

One respondent representing an omission site argued that allocating land within their ownership would better maintain an area of non-coalescence.

Natural England highlighted the proximity of the North Wessex Downs National Landscape and for policy to ensure that impacts are mitigated. They also highlighted a number of areas that might support wildlife and so advised for Phase 1 surveys to be undertaken in these cases.

National Highways recognised that the impacts of growth in this location on the strategic road network would likely be of a more dispersed nature.

How the main issues were taken into account:

Please note, “Policy SGL05: East Wroughton”, presented in the Reg 18 Consultation Draft, has been recoded to “Policy SDA12: Land at Wroughton” in the Regulation 19 Publication Version.

We acknowledge the representations received from landowners within the Wroughton area. We have taken these representations forward into the Regulation 19 Publication Version. Parcels in the north and south of the growth area have been retained as residential-led schemes, while the central parcel has been removed, as requested. The remaining land therefore reflects the parcels that are available and capable of contributing to the planned growth at Wroughton.

We also acknowledge the representations made regarding the need for supporting infrastructure to be delivered alongside new development at Wroughton, including requests for additional GP capacity, additional school places and new shops. Infrastructure requirements stemming from the planned growth in this area are being identified through the Infrastructure Delivery Plan, and although a new GP surgery or new school has not been explicitly allocated here in the Reg 19 Local Plan, the request has been communicated to the relevant health authorities and school place planning. The Reg 19 Plan therefore retains our strategic approach to infrastructure provision, with details regarding scale, timing and delivery of individual infrastructure requirements to be established as development comes forward. With regards to additional shops, the town centre policies now provide some flexibility for smaller convenience provision as part of larger development schemes. Whilst concerns over key worker housing were fed into the Local Housing Needs Assessment the

assessment concluded that these needs should be considered as part of the wider population.

With regards to village character, an expanded area of non-coalescence has been allocated within the Reg 19 Plan to safeguard more visual and physical separation between the village and the built-up area, particularly when travelling along Swindon Road.

We further acknowledge the representation made to allocate land that wouldn't interrupt the area of non-coalescence. Although this proposed alternative allocation was considered and assessed within the SHELAA, it has not been taken forward within the Regulation 19 Plan.

Regarding transport, London Road remains identified as a key public transit route and we accept National Highway's comments regarding the potential impact of growth at East Wroughton on the strategic road network and their observation that these impacts are likely to be more dispersed in nature. Wroughton's location between the M4 junction means that traffic generated by development is likely to disperse across the surrounding highway network rather than being concentrated at a single M4 junction. This has been acknowledged in considering the transport implication of the growth area. These impacts will continue to be assessed through the Plan's transport evidence and Infrastructure Delivery Plan and, where appropriate, site-specific Transport Assessments, with any necessary mitigation identified and secured through relevant mechanisms. This will ensure that the impacts of development at East Wroughton on both the local highway network and the strategic road network are appropriately considered as development proposals come forward.

We acknowledge Natural England's comments regarding the proximity of the North Wessex Downs National Landscape to the area, and the need to ensure that development appropriately mitigates potential impacts. The ecological evidence work undertaken for this area have included a Phase 1 Survey, which has identified ecological considerations and necessary mitigation requirements. These findings will inform site delivery. Any future planning applications will need to demonstrate how identified ecological constraints and measures have been addressed. The proximity, setting and landscape character of the North Wessex Downs National Landscape will also need to be appropriately considered as proposals are brought forward, with consideration given to the wider environment policies contained in Chapter 8: An Environmentally Sustainable Swindon.

Policy SGL06: North Tadpole

Summary of main issues raised:

Respondents generally supported the allocation of the site for residential-led development, with landowners expressing support for its continued inclusion in the Plan. However, concerns were raised regarding the impacts of development on the

local highway network, particularly how additional vehicular movements would be managed and the implications for routes through Broad Blunsdon. Respondents also highlighted the need for supporting infrastructure to accompany housing growth, including the provision of community facilities such as schools and green space to ensure that future development is adequately supported.

How the main issues were taken into account:

Please note, “Policy SGL06: North Tadpole”, presented in the Reg 18 Consultation Draft, has been recoded to “Policy SDA09: North Tadpole” in the Regulation 19 Publication Version.

We acknowledge the support offered for the allocation of North Tadpole for residential-led development. We also recognise concerns regarding the management of vehicular movement, particularly in relation to routes into Broad Blunsdon. We recognise this area as one of particular concern and therefore have ensured that the potential transport impacts of development have been considered through the transport modelling undertaken to inform the Reg 19 Plan, alongside other locations where transport impacts are a consideration. The spatial vision for North Tadpole seeks to secure appropriate transport routes and connections, with the Infrastructure Delivery Plan identifying and securing any necessary mitigation measures.

We also acknowledge comments regarding the need for additional facilities, including schools and green space, and to support development at North Tadpole. The Reg 19 Plan’s infrastructure requirements, alongside the Infrastructure Delivery Plan, will consider the infrastructure needs arising from development. In addition, the identification of an area of non-coalescence will safeguard land and provide an opportunity for open space, helping ensure development is supported by green infrastructure.

Policy UGA01: Marlowe Avenue

Summary of main issues raised:

Respondents generally supported the designation of the Urban Regeneration Area but sought stronger provisions for green infrastructure, biodiversity, leisure and sports facilities. Comments also highlighted the importance of improving active travel and public transport connectivity, while ensuring impacts on existing bus services are considered and appropriate funding mechanisms are secured.

How the main issues were taken into account:

Please note, “Policy UGA01: Marlowe Avenue”, presented in the Reg 18 Consultation Draft, has been recoded to “SDA03: Marlowe Avenue Urban Regeneration Area” in the Regulation 19 Publication Version.

We acknowledge the support for the definition of Marlowe Avenue as an Urban Regeneration Area. The Reg 19 Plan retains Marlow Avenue as an Urban Regeneration Area and identifies capacity for 976 new homes over the plan period. Policy UGA01 requires high-quality, comprehensive development across the area to come forward through a strategic masterplan, providing a framework for considering development collectively.

We recognise comments, including from Natural England that the policy should give greater consideration to green infrastructure, ecology, leisure and sports provision. The Marlowe Avenue Masterplan identifies opportunities to better integrate green infrastructure through the area, while the Policies Map continues to safeguard identified green infrastructure corridors and routes. This provides a framework for maintaining and improving green infrastructure connectivity as development comes forward, alongside the requirements of the Reg 19 Plan's wider green infrastructure and biodiversity policies contained in CSE6 and CSE7. Our Sports Needs Assessment and Infrastructure Delivery Plan have also considered the additional recreational needs arising from growth and identified additional sports facilities required to support development. These requirements will be factored into the delivery of the Urban Regeneration Area, and we remain open to opportunities for future development of facilities.

We acknowledge representations made, including from Swindon Borough Council Highways, regarding transport and movement. In particular, questions about improvements to active travel and concerns regarding potential impacts on existing bus route. The transport approach to Marlowe Avenue has been considered through the Reg 19 Plan's wider sustainable transport policies, contained in Chapter 7: Well-Connected, Sustainable Transport, as well as the Infrastructure Delivery Plan, with the strategic masterplan providing an opportunity to coordinate walking, cycling and public transport connections across the area and with the existing network. The delivery of improvements will need to take account of existing bus routes and network operation alongside opportunities for improvement as the development comes forward.

We also recognise the request for an appropriate S106 mechanism to secure funding for transport improvements. The Section 106 Agreement for Oakfield Campus, Marlowe Avenue, indicates that Marlowe Avenue is supported by a range of contributions and transport measures through planning obligations, including highways contributions, a Travel Plan, and a Highways Improvement Scheme. This provides a mechanism for development to contribute toward identified transport improvements, with specific infrastructure requirements for future development informed by the Infrastructure Delivery Plan and other relevant transport evidence, existent or forthcoming.

Policy UGA02: Pipers Way

Summary of main issues raised:

Respondents generally supported the designation of the Urban Regeneration Area, with some promoting the inclusion of additional land parcels. Comments highlighted the need to protect and enhance environmental assets, including ancient woodland, and to address flood risk. Respondents also sought clarification on the requirement for a strategic masterplan and emphasised the importance of delivering supporting infrastructure and amenities, including improvements to walking, cycling and public transport, safeguarding the canal corridor, and providing local services and facilities.

How the main issues were taken into account:

Please note, “Policy UGA02: Piper’s Way”, presented in the Reg 18 Consultation Draft, has been recoded to “Policy SDA02: Piper’s Way Urban Regeneration Area” in the Regulation 19 Publication Version.

We acknowledge the support for the definition of Piper’s Way as an Urban Regeneration Area, including from landowners within the area, and the suggestion of additional parcels to be added. Additional parcels put forward through consultation have been considered through the Strategic Housing Land Availability Assessment (SHELAA), with those considered suitable taken forward as additional sites. This provides greater scope for the area to contribute toward regeneration and the efficient use of land.

We recognise Natural England’s representations regarding the presence of Ancient Woodland and the importance of its retention. The protection of Ancient Woodland is secured through Policy CSE9 in the Reg 19 Plan, which identifies ancient woodland as an “irreplaceable” habitat and requires development to protect and enhance such visually or ecologically important habitats and features. This Policy ensures that the presence and value of Ancient Woodland, including that within the Pipers Way area, will be taken into account as development proposals come forward.

We acknowledge the Environment Agency’s concern regarding flood risk associated with the nearby river. In response, the Reg 19 Plan’s approach to flood risk has been strengthened, particularly through Policy CSE12: Managing Flood Risk. This sets out requirements for development to avoid and minimise flood risk from all sources, including fluvial, surface water and groundwater flood, and to avoid increasing flood risk elsewhere. All development must be informed by the Strategic Flood Risk Assessment, apply the Sequential Test and, where necessary, Exception Tests as detailed in the NPPF and Technical Guidance. It further requires Flood Risk Assessments for development in Flood Zones 2 and 3, as well as other areas identified as being at increased flood risk and requires all major development and non-major development involving new buildings to incorporate Sustainable Drainage Systems. This strengthened framework ensures that flood risk at Piper’s Way is appropriately assessed.

Furthermore, we acknowledge questions raised regarding the purpose and propriety of the requirement for producing a strategic masterplan. However, given the nature of the Urban Regeneration Area and the potential for development to come forward across a number of neighbouring sites, a coordinated approach remains important. The Reg 19 Plan retains a requirement for strategic masterplans, and is intended to ensure that neighbouring sites work collaboratively to support policy requirements for efficient use of land, the provision of appropriate infrastructure, and delivery of high-quality development.

Finally, we recognise the range of representations regarding transport, amenities and infrastructure, including improvements to pedestrian, cycle, and bus infrastructure, safeguarding the canal line and the provision of a local centre. Piper's Way has been identified as a key transit corridor, and opportunities to improve public transport and associated sustainable transport infrastructure are being considered through the Infrastructure Delivery Plan.

Other general comments relating to Chapter 4

Summary of main issues raised:

Respondents raised a range of comments regarding site allocations and supporting environmental infrastructure. Several planning agents and land promoters put forward additional sites for consideration and promoted further development opportunities beyond those identified in the Plan.

Environmental considerations were also raised in relation to the presentation of strategic growth areas. The Environment Agency recommended that site allocations and the Key Diagram should identify the principal watercourses associated with each Strategic Growth Location to ensure that these assets are appropriately recognised, safeguarded and enhanced through the development process. Respondents considered that a clearer representation of watercourses would help support flood risk management, environmental protection and the integration of blue and green infrastructure within strategic growth areas.

How the main issues were taken into account:

Sites submitted via the Call for Sites 2025 or promoted alongside Regulation 18 Consultation responses have been added to the SHELAA database and assessed in the SHELAA Update (2026).

The Council considers that the Strategic Flood Risk Assessment (SFRA) already provides detailed flood risk and watercourse information for the entire spatial strategy, including setting maps and Level 2 SFRAs where required. Utilising this comprehensive evidence base ensures these assets are appropriately recognised and safeguarded through the development process, and provides a more appropriate and robust mechanism for this detailed information instead of including it on the Key Diagram.

Chapter 5: Sustainable, High-Quality Development

SP1: Sustainable Development

Summary of main issues raised:

Respondents were generally supportive of the objective of creating sustainable development, with Oxfordshire County Council expressing support for the policy's overall aims and Thames Water welcoming the requirement for developers to engage with infrastructure providers at an early stage of the planning process.

However, several respondents sought amendments to strengthen and clarify the policy. A key theme was the need for a stronger emphasis on sustainable transport and modal shift. Stagecoach West and Swindon's Bus Company argued that the policy does not fully align with the Plan's strategic objectives and wider strategic policies, particularly in placing modal shift at the heart of new development. Several respondents similarly proposed rewording the policy to provide stronger support for sustainable transport measures.

Respondents also called for greater clarity regarding how sustainable development would be delivered in practice. While some supported the policy's overall approach, they suggested that it should identify more clearly the specific measures and outcomes expected from development proposals. In addition, respondents recommended the inclusion of provisions relating to the sustainable use of water, adaptation to extreme weather and climate change, and the consideration of off-site energy generation as part of a broader approach to sustainability.

Concerns were also raised regarding infrastructure requirements. Some respondents argued that the granting of planning permission should not be dependent upon utility infrastructure capacity already being in place, suggesting that infrastructure provision should not act as a barrier to development. Conversely, Thames Water supported the policy's emphasis on early engagement with infrastructure providers to help ensure that infrastructure needs are identified and planned for at an early stage.

Swindon Borough Council's Transport Department raised concerns that the policy lacks sufficiently robust and unambiguous requirements to support decision-making and the Council's transport objectives. In particular, it highlighted the absence of minimum accessibility standards and more explicit requirements to ensure that development is safe and does not prejudice the effective operation of the Borough's transport network.

How the main issues were taken into account:

Please note, “Policy SP1: Sustainable Development” presented in the Reg 18 Consultation Draft, has been deleted and replaced with policies in the Regulation 19 Publication Version which covers relevant topic areas. This was to avoid duplication and to improve the clarity of the plan.

We have identified mode shift is important to bring change into travel behaviour, improves connectivity, permeability and accessibility. However, the best place to include consideration of mode shift for new development should be under Chapter 7: Well-connected, sustainable transport. The NPPF (2024) suggests to consider using a vision-led approach to identify transport solutions. Under Policy ST1: Spatial Vision: A Well-Connected Swindon and Policy ST2: Promoting Sustainable Transport, the policies encourage new development to achieve mode shift, change in travel behaviour and requires to consider sustainable transport hierarchy.

The NPPF (2024) suggests ensuring patterns of movement, streets, parking and other transport considerations are integral to the design of schemes and contribute to making high-quality places. The design led parking interventions are covered under Policy ST9: Parking and EVs.

The Council recognises the concerns raised regarding the need for greater clarity on how sustainable development and climate resilience will be delivered in practice. The policy framework has been strengthened to provide clearer requirements for development proposals to address climate change mitigation and adaptation.

Policy CSE1: Mitigation and Adaptation to Climate Change requires development proposals to provide a proportionate Sustainability Statement identifying site-specific climate change issues and setting out appropriate mitigation and adaptation measures. The policy also sets out specific requirements to address overheating, urban heat island effects, natural ventilation, building orientation, layout and future climate uncertainty, helping to ensure that climate resilience is considered through the design and delivery of development.

In addition, Policy CSE5: Renewable Energy supports the generation of renewable and low-carbon energy and associated infrastructure as part of the transition towards net zero. The policy also supports community-led renewable energy schemes and requires proposals to consider their wider benefits for local communities. Together, these policies provide a clearer framework for addressing climate change, renewable energy and resilience through development proposals.

SD1: Effective Use of Land

Summary of main issues raised:

Respondents generally supported the principle of the policy and its aim of ensuring land is used effectively to deliver housing in sustainable locations. Many respondents

agreed that development should optimise the use of land through well-connected streets and spaces and, where appropriate, higher-density development. Support was also expressed for higher levels of densification within the Central Area, including mixed-use development that could increase social and economic activity and contribute to reducing anti-social behaviour.

Whilst supporting the policy's overall objectives, a number of respondents sought changes to its implementation. Respondents representing the development sector generally supported a flexible approach to density and cautioned against the inclusion of prescriptive density thresholds at Regulation 19 stage. Conversely, some respondents called for lower-density development in specific locations, particularly South Marston. One respondent also suggested adopting Adur District Council's one-metre separation standard for small detached, semi-detached and end-of-terrace dwellings.

Biodiversity Net Gain (BNG), design and density were recurring themes within responses. A respondent representing the development sector highlighted practical challenges associated with delivering BNG on-site and the implications this can have for achieving proposed densities. Concerns were raised regarding tensions between design quality, density expectations and the BNG hierarchy, particularly on brownfield sites containing open mosaic habitat, where the costs associated with BNG delivery were said to affect scheme viability and deliverability. Other respondents noted that effective use of land should not be measured solely through density, highlighting opportunities to achieve multiple functions through the integrated provision of green space, amenity areas, biodiversity enhancements and sustainable drainage systems.

Respondents also commented on the relationship between efficient land use and design quality. While there was broad support for the policy's intent, some respondents expressed concerns that previous development schemes, including West Wichelstowe and Wakefield House, had not been sufficiently sympathetic to their surroundings. One respondent sought clarification of the phrase "sympathetic to the surrounding environment", suggesting that it should relate specifically to heritage assets, green infrastructure and transport infrastructure. Another respondent argued that the policy should place greater emphasis on the redevelopment and redesign of previously developed sites and underutilised urban sites to ensure they make more efficient use of land.

Concerns were also raised regarding infrastructure provision and development delivery. One respondent considered that the policy could result in development becoming dependent upon agreements with infrastructure providers, potentially delaying or constraining delivery.

Environmental considerations featured prominently in a number of responses. The Environment Agency supported the policy's objectives but considered that greater emphasis should be placed on environmental factors within site design and sustainability. In particular, it recommended strengthening the policy and supporting text to ensure developments retain and enhance riparian buffers, integrate mature trees, hedgerows and wetlands, protect ecological corridors and habitat connectivity, and deliver multifunctional green and blue infrastructure. Respondents generally considered that these measures would help ensure that efficient land use is balanced with environmental protection and wider sustainability objectives.

How the main issues were taken into account:

Please note, "Policy SD1: Effective Use of Land" presented in the Reg 18 Consultation Draft, has been recoded to "Policy SD2: Effective Use of Land" in the Regulation 19 Publication Version.

There was general support for this policy, although some respondents expressed different views on the level of density that should be promoted. Some considered the policy should have higher densities in the central area, while others sought lower densities in specific areas across the Borough. The Regulation 19 policy retains the original objective of the policy but provides greater clarity through a design-led approach to optimising density, support for temporary uses in regeneration areas, and encouragement for the redevelopment and reuse of brownfield land.

We acknowledge the potential challenges of delivering habitats on complex brownfield sites. Nevertheless, the statutory Biodiversity Net Gain framework broadly establishes the baseline that developments are generally expected to navigate. Where it appears that on-site delivery might present spatial complications for a scheme's proposed design or density, one potential approach could involve exploring registered off-site habitat banking.

The Council recognises the concerns raised regarding the potential viability and deliverability implications of Biodiversity Net Gain (BNG), particularly where on-site provision may affect the development potential of sites. The Council has considered the viability implications of the statutory BNG requirements as part of the preparation of the Plan and has not sought to introduce local BNG requirements above the national statutory minimum.

The viability assessment therefore reflects the national BNG requirements and applicable exemptions, thresholds and delivery mechanisms. This approach seeks to ensure that the Plan does not introduce additional BNG requirements that could place unnecessary viability or deliverability pressures on development, while maintaining consistency with the statutory framework for achieving biodiversity net gain.

The Council recognises the importance of providing high-quality amenity space as part of achieving effective and well-designed development. Policy SD1: High-Quality Design requires private amenity space to be provided proportionate to the size, type and occupancy of the dwelling, with minimum standards for houses and apartments. The policy also allows for communal gardens, roof terraces and other shared amenity spaces where individual private amenity space cannot be provided in full, provided that these deliver an equivalent or improved amenity outcome. This approach provides flexibility for different development contexts while ensuring that adequate amenity provision remains an integral part of good quality development.

SD2: Mixed Use Developments

Summary of main issues raised:

Respondents generally supported the policy's objectives but raised concerns that requiring all mixed-use development to be delivered through a masterplan approach could add unnecessary complexity and potentially hinder regeneration opportunities.

How the main issues were taken into account:

Please note, "Policy SD2: Mixed Use Developments" presented in the Reg 18 Consultation Draft, has been recoded to "Policy SD3: Mixed-use Developments" in the Regulation 19 Publication Version. Respondents generally supported this policy in principle but raised concerns about the requirement for all mixed-use development to be brought forward through a masterplan approach. This concern has been taken into account by retaining the masterplan approach while refining the policy to provide a clearer and more proportionate framework for mixed-use development, with greater emphasis on larger and strategic sites.

SD3: High-Quality Design

Summary of main issues raised:

Respondents generally supported the policy's objective of securing high-quality design but raised a range of comments regarding its scope, implementation and evidential basis. Several respondents suggested that the policy should place greater emphasis on local context, architectural identity, nature and biodiversity, the protection and enhancement of wildlife habitats, and climate-responsive and energy-efficient development. Respondents also sought clearer links between the policy, Local Nature Recovery objectives and Biodiversity Net Gain requirements.

While many respondents welcomed the policy's aspirations, some questioned whether it contains sufficiently robust mechanisms to ensure that the quality secured through the planning process is ultimately delivered on the ground. Others considered that the policy does not fully address the breadth of issues associated

with high-quality design and suggested that its purpose and requirements should be expanded and clarified.

A significant theme raised by respondents from the development sector related to the balance between design standards and flexibility. Concerns were raised regarding requirements to avoid single-aspect apartment units and the expectation to provide private external amenity space where alternatives are unavailable, with some respondents arguing that these requirements are overly prescriptive. Similarly, several respondents, including the Home Builders Federation, questioned the evidence base supporting the proposed application of Nationally Described Space Standards, arguing that additional justification is required. In contrast, other respondents expressed support for the inclusion of Nationally Described Space Standards within the policy.

A number of respondents from the development sector advocated a more flexible approach to policy implementation, suggesting that site-specific design solutions should be permitted where they can achieve high standards of design, layout and amenity. These respondents argued that the policy should avoid overly prescriptive requirements and instead allow appropriate flexibility to respond to individual site circumstances while maintaining overall design quality objectives.

NHS Property Services supported the policy's objectives and recommended closer alignment with its healthy design framework, particularly in relation to ensuring development is accessible and responsive to a broad range of health needs. Overall, respondents generally supported the ambition to achieve high-quality design but sought greater clarity regarding delivery, stronger integration of environmental considerations, and a better balance between design requirements and flexibility in implementation.

How the main issues were taken into account:

Please note Policy “SD3: High-Quality Design” presented in the Reg 18 Consultation Draft, has been recoded to “Policy SD1: High-Quality Design” in the Regulation 19 Publication Version.

The Council recognises the range of comments regarding the scope and implementation of the high-quality design policy. The Policy SD1: High-Quality Design has been developed to provide a comprehensive framework for well-designed development, requiring proposals to respond positively to the site and its surroundings, including local character, history, landscape and built form, while also creating or reinforcing a distinctive sense of place through architecture, materials and detailing. The requirement for a proportionate Design and Access Statement or

equivalent supporting information provides a mechanism for demonstrating how these principles have been applied to individual proposals.

The Policy CSE1: Mitigation and Adaptation to Climate Change, Policy CSE2: Carbon Reduction and Sustainable Design and Policy CSE11: Biodiversity, Geodiversity and Nature Recovery also incorporates specific requirements relating to nature, biodiversity and climate-responsive design. This includes the protection, enhancement and integration of green and blue infrastructure and the delivery of measurable biodiversity gains where appropriate. It also requires development to conserve natural resources, respond to climate change, improve energy efficiency and minimise carbon emissions, with proposals expected to have regard to the relevant policies. The requirement for a proportionate Sustainability Statement or equivalent supporting information provides a mechanism for demonstrating how these principles have been applied to individual proposals.

The Council recognises comments regarding the need for flexibility to respond to individual site circumstances while maintaining high standards of design and amenity. The policy has been structured to establish clear design principles and outcomes rather than prescribing a single design solution for every site. In particular, proposals are required to respond positively to their specific context, including local character, landscape and built form, and to demonstrate how the principles have been applied through a proportionate Design and Access Statement or equivalent supporting information.

The policy also allows for site-specific solutions where appropriate. For example, flexibility is provided for apartments where single-aspect units cannot reasonably be avoided, subject to justification and appropriate mitigation, and for private amenity space where communal gardens, roof terraces or other shared spaces can provide an equivalent or improved amenity outcome. The provision for a reduced private amenity space standard within the Central Area where justified by site context and accessibility to high-quality public spaces further demonstrates this approach. These provisions allow the policy to respond to individual site circumstances while maintaining the overall objectives of achieving high-quality design, layout and amenity.

SD4: Inclusive Design

Summary of main issues raised:

One respondent raised concerns regarding the accessibility and safety of public transport and pedestrian infrastructure, including the provision of dedicated wheelchair spaces on buses, dropped kerbs and tactile paving at junctions, and the maintenance and repair of pavements and pedestrian paths.

Sport England suggested that the policy should include an explicit reference to its Active Design guidance within the policy wording for High Quality Design and Inclusive Design.

How the main issues were taken into account:

The Council recognises the concerns raised regarding the accessibility and inclusivity of public transport and pedestrian infrastructure. Policy ST4: Transport Infrastructure Design requires infrastructure proposals to provide safe and inclusive access for all members of the community, including through consideration of future users, avoidance of barriers to use, and adaptation or retrofitting of infrastructure to widen accessibility. The policy also requires proposals to meet or exceed the requirements of the Inclusive Design Policy SD4, ensuring that inclusive design principles are embedded in the planning and delivery of transport infrastructure.

SD5: Tall Buildings

Summary of main issues raised:

Respondents expressed both support for and concerns about the Tall Buildings policy. Several respondents from the development sector welcomed the policy's flexible approach to building heights and supported the principle of tall buildings where they make a positive contribution to Swindon's skyline and support the delivery of higher-density development.

However, a number of respondents raised concerns regarding viability and deliverability. The Home Builders Federation highlighted the potential impact of the latest Building Regulations on developments above four storeys and questioned the commercial viability of tall buildings. It also argued that the policy may not support the delivery of a broad range of housing types and suggested that high-density development can be achieved through lower-rise, family housing schemes rather than relying on tall buildings. More generally, respondents noted the need to balance the policy's ambitions with development viability, emphasising that the achievement of viable densities and mixed-use development is closely linked to the effectiveness and deliverability of the Tall Buildings policy.

Several respondents from the development sector sought greater clarity within the policy, noting that it does not define what constitutes a tall building. Respondents recommended that the policy should establish locally specific definitions or height thresholds for different parts of the Borough to provide greater certainty for applicants and decision-makers.

Design and placemaking considerations also featured prominently within responses. Some respondents raised concerns that taller buildings within the Central Area could create an "urban canyon" effect, impacting the character and quality of the urban

environment. South Swindon Parish Council questioned whether the provision of small pocket parks alone would be sufficient to meet the need for natural and open spaces and suggested that greater emphasis should be placed on maintaining existing amenities and providing a wider range of meaningful green and open space typologies.

Accessibility and inclusivity were also identified as important considerations. Local representatives highlighted the need for the policy to provide clearer guidance on design requirements for high-rise development to ensure that buildings are fully accessible and inclusive, particularly for people with limited mobility. Overall, respondents generally supported the principle of tall buildings in appropriate locations but sought greater clarity on their definition, stronger consideration of accessibility and placemaking, and reassurance that the policy's aspirations can be delivered viably in practice.

How the main issues were taken into account:

We recognised that the policy was lacking explanation of the tall building definition which is resolved by defining contextual definition of what tall building is according to Central Area of Swindon. To mitigate effect on microclimate, the policy introduces consideration of Sustainable Design and Construction which requires careful consideration of design-led interventions to prevent impact on micro-climate such as urban canyon effect. Other Design-led specifications were included to achieve appropriate architectural quality and ensure functionality of taller development.

The Council recognises the importance of ensuring that tall buildings are accessible and inclusive for all users, including people with limited mobility. The Local Plan provides a framework for inclusive design and requires development to provide safe, inclusive and accessible environments, while detailed technical requirements relating to accessibility and access within buildings are addressed through the Building Regulations.

The policy therefore provides a clear planning framework for accessibility and inclusive design, with detailed technical standards to be considered through the Building Regulations as part of the subsequent design and delivery of development. This approach supports accessible and inclusive development while allowing proposals to respond appropriately to their individual context.

The Council recognises the concerns raised regarding the relationship between housing mix, density, tall buildings and development viability. As part of the Plan's viability assessment, the viability report has considered the implications of the proposed housing tenure and size mix, including the approach set out in Policy HC2 and other relevant site allocation policies.

The viability assessment has also taken account of the density assumptions applied to the site allocations and the differing development characteristics of locations across the Borough. The assessment reflects the approach that housing mix is not intended to be applied rigidly to every individual site, with the mix informed by the characteristics and location of development, including the higher proportion of smaller units anticipated in higher-density city-centre schemes and a greater proportion of family housing on larger suburban and fringe sites.

This approach enables the viability and deliverability of the Plan's housing requirements, including the relationship between density, housing mix and site-specific development assumptions, to be considered as part of the overall viability assessment.

SD6: Villages and Development in the Countryside

Summary of main issues raised:

Respondents sought greater clarity on how the policy would apply within villages and the countryside, including whether its requirements are consistent with the wider spatial strategy and, in particular, Policy SS2: Settlement Hierarchy. While respondents generally supported the settlement hierarchy, some considered that a clearer relationship was needed between the policy, the distribution of growth and the identification of development sites to ensure housing needs can be effectively met across the Borough.

A number of respondents representing the development sector argued that the policy should adopt a more flexible approach towards development in rural areas. In particular, they suggested that greater flexibility should be provided to support the delivery of small-scale development in the countryside where it would be sustainable and appropriate to its setting.

Respondents also sought further clarity regarding the design expectations for development in rural locations, including how proposals should respond to local character and context. Concerns were raised that, without additional guidance, the policy could be difficult to interpret consistently across different settlement types and countryside locations.

South Oxfordshire and Vale of White Horse District Councils supported the policy's objectives but recommended that greater consideration be given to the wider effects of development. In particular, they suggested that the policy should recognise both the community benefits that development can deliver and the cumulative impacts that multiple developments may have on the landscape over time.

How the main issues were taken into account:

Please note, “Policy SD6: Villages and Development in the Countryside” presented in the Reg 18 Consultation Draft, has been deleted and replaced with “Policy HC7: Rural Exceptions Sites and Rural Workers Dwellings”, “Policy SS1: Swindon’s Spatial Approach to Growth” and “Policy SS2: Settlement Hierarchy” in the Regulation 19 Publication Version.

The main issues raised through Regulation 18 Policy SD6: Villages and Development in the Countryside have been taken into account through the replacement of Policy SD6 with Policies SS1, SS2 and HC7. This approach has addressed the concern regarding clarity on design requirements in villages and consistency with the settlement hierarchy through Policy SS2, which sets out clear criteria relating to settlement form, character and design. Clarity on meeting housing needs and identifying sites has been improved through Policy SS1, which supports proportionate development in Rural Service Centres and larger villages as part of the Borough’s spatial strategy. Policies SS2 and HC7 also provide a clearer approach to development in the countryside, setting out the circumstances in which development will be supported. Greater emphasis is also placed on protecting landscape character, addressing concerns regarding the cumulative impacts of development on the landscape.

SD7: Residential Extensions and Alterations

Summary of main issues raised:

Some respondents suggested that the policy should place greater emphasis on improving the energy efficiency of residential extensions as part of supporting wider sustainability and climate objectives. Swindon Borough Council's Transport Development Management Team sought clarification that the Borough's Parking Standards apply to development proposals covered by the policy, to ensure consistency in its implementation and decision-making

How the main issues were taken into account:

Please note, “Policy SD7: Residential Extensions and Alterations”, presented in the Reg 18 Consultation Draft, has been recoded to “Policy SD6: Residential Extensions and Alterations” in the Regulation 19 Publication Version.

In the Reg 19 Plan, the overall approach to managing residential extensions and alterations has been retained, with the policy refined to provide greater clarity on matters to be considered. Criteria 1.a now makes reference is now made to the size, scale, massing and design of extensions and outbuildings, requiring these to be clearly subservient to the original dwelling and appropriate to the character and appearance of the surrounding area. Criteria 1.has also been updated to require high-quality and locally sensitive design, in accordance with Policy SD1: High-Quality Design.

Criteria 1.d, concerning heritage impacts, has been revised from a requirement to avoid harm to the historic and/or architectural integrity of existing or nearby dwellings or matters of historic importance, to a more specific requirement that proposals do not harm the significance and/or setting of heritage assets. Similarly, Criteria 1.e, concerning use of materials, has been expanded to consider detailing and roof forms, as well as requiring these elements to complement the character of the original dwellings. Criteria 1.d and 1.e, covering environmental impacts, have been retained, with relevant policy cross-references updated from CSE6 to CSE9 and CSE8 to CSE11 respectively.

We understand the representations made suggesting that the policy should require improved energy efficiency for residential extensions. This has not been incorporated into Policy SD6 of the Reg 19 Plan, as the function of this policy is to establish specific design and amenity requirements for extensions and alterations, rather than to introduce energy-efficiency standards for this type of development. Matters relating to energy efficiency are instead addressed through Policy CSE2: Carbon Reduction and Sustainable Design, which applies to new development and requires such to minimise energy consumption and apply the energy hierarchy, including through energy-efficient design. The supporting text for this policy also recognises the Building Regulations as the primary framework for setting energy-efficiency requirements and seeks to avoid duplicating those requirements. We therefore consider a separate energy-efficiency requirement within Policy SD6 unnecessary, as proposals for residential extensions and alterations are able to be considered against the Plan's wider carbon reduction and sustainable design requirements.

We also acknowledge the representation made by Swindon Borough Council Transport Development Management Team requesting that the policy make clear that Parking Standards apply. This has been addressed through the inclusion of criteria 1.h, which requires development proposals to have regard to the Swindon Borough Council Parking Standards, unless specific evidence is provided to justify an alternative approach. This sits alongside Policy ST9: Parking and EV's, which confirms that parking provision in new developments should be made in accordance with the Council's parking standards.

SD8: Historic Environment

Summary of main issues raised:

Respondents expressed a range of views on the policy, with some supporting its approach to balancing the public benefits of development against harm to heritage assets. In particular, support was expressed for the policy's proportional approach to weighing harm or loss against the public benefits of a proposal.

However, several respondents sought amendments to improve clarity and consistency. Highworth Town Council questioned the evidential basis for the policy, considered that its wording could be clearer and suggested that it should make

reference to enabling development. Other respondents raised concerns regarding the policy's relationship with national policy, arguing that it should align more closely with the National Planning Policy Framework (NPPF). In particular, concerns were raised regarding the wording relating to the balancing of heritage harm and public benefits, which some respondents considered to be inconsistent with the NPPF, while others recommended closer alignment with paragraph 207 of the NPPF (2024).

Overall, while there was support for the policy's heritage-led approach and its proportional assessment of harm and public benefits, respondents sought greater clarity, a stronger evidence base and closer alignment with national planning policy.

How the main issues were taken into account:

Please note, "Policy SD8: Historic Environment" presented in the Reg 18 Consultation Draft, has been recoded to "Policy SD7: Historic Environment" in the Regulation 19 Publication Version.

Several amendments have been made to Policy SD8 in response to comments received. We acknowledge Highworth Town Council's concerns that the policy lacks evidence. However, there is significant evidence that supports the need for a policy on the historic environment. The borough contains numerous designated and non-designated heritage assets, and the Council has produced Conservation Area Appraisals and Management Plans. The need for an historic environment policy also aligns with Paragraph 203 of the NPPF (2024) that 'plans should set out a positive strategy for the conservation and enjoyment of the historic environment.'

Further, we recognise Highworth Town Council's concerns regarding the clarity of the policy. They suggested that Part 1 of the policy should include a list of the heritage assets, which we agree with and have added to Part 1. Further amendments have been made to make the policy clearer, as follows:

- The restructuring of the policy to improve clarity.
- The removal of the sections on Conservation Areas, Scheduled Monuments, and Assets of Archaeological Significance. The policy had unnecessarily separated these from 'Heritage assets' when within national policy, these all come under the broader category of 'Heritage assets'.

We understand Highworth Town Council's concerns that the policy does not refer to enabling development. However, local evidence suggests that it is not a justifiable addition to the policy.

We recognise respondents' concerns regarding the policy's inconsistency with the NPPF (2024). Part 3 incorrectly required all proposed development that would cause harm to a heritage asset to be subject to a weighing of harm against public benefits. Paragraph 215 of the NPPF (2024) only applies this test to proposals causing 'less than substantial harm'. We have therefore removed Part 3. Part 2(a)(i) and (v) now

requires heritage statements to demonstrate compliance with national policy and to provide justification for the acceptability of proposals causing harm, considering the public benefits of the proposal. This aligns more closely with paragraphs 214 and 215 of the NPPF (2024).

Further, we agree with the respondent's suggestion that the policy should refer to Paragraph 207 of the NPPF (2024) and it has been included in Part 2(a)(iv).

SD9: Heritage Transport

Summary of main issues raised:

Respondents generally supported the policy and the restoration of the Wilts and Berks Canal. However, comments raised concerns regarding the accuracy of the canal route shown on the Policies Map, the clarity and justification of certain policy requirements, and the potential implications for development delivery and viability. Respondents also sought stronger safeguarding of related transport infrastructure, including the Swindon and Cricklade Railway, and requested greater clarity on balancing canal restoration, heritage protection and future land-use priorities.

How the main issues were taken into account:

Please note, "Policy SD9: Heritage Transport" presented in the Reg 18 Consultation Draft, has been recoded to "Policy SD8: Heritage Transport" in the Regulation 19 Publication Version.

A number of amendments have been made to the policy in response to the main issues. We acknowledge the respondent's desire for the policy to safeguard a route for the Swindon and Cricklade Railway to the Swindon to Gloucester mainline. However, we did not receive a representation from the Swindon and Cricklade Railway Company; therefore, it is unclear if this is an ambition of theirs.

In light of respondents noting the out-of-date canal route on the Policies Map, this has been updated.

A number of amendments have been made to the policy in response to the Wilts and Berks Canal Trust's comments. They have been made to improve clarity, align with Wilts and Berks Canal Trust's preferred wording, and to enable greater flexibility in the policy. The amendments made are as follows:

In Part 1, the word 'defined' has been replaced by 'shown indicatively'.

In Part 1 (b), reference to 'aspirational stretches' has been replaced by 'stretches proposed for restoration, including existing and new stretches'.

The inclusion of Part 2 which seeks to safeguard existing stretches of the canal not part of the restoration programme for heritage.

Although we recognise Wilts and Berks Canal Trust's concerns over Part 2 (a)'s requirement for land to be secured for proposals, it is important that permissions

granted for stretches of the canal route come forward in a timely fashion. A separate MoU between the Council and the Canal Trust has been developed to guide this process.

Further, we acknowledge the respondent from the development sector's concerns over the policy's promotion of the Wilts and Berks canal. Nevertheless, we disagree that the policy lacks evidence, is not justified and is inconsistent with national policy. Sections of the Wilts and Berks canal have already been delivered at large strategic allocations, for instance, at Wichelstowe, and so there is evidence that sections of the canal can be delivered as part of new developments. The policy also is consistent with Para 203 of the NPPF (2024) in that 'plans should set out a positive strategy for the conservation and enjoyment of the historic environment'. The Council does not believe that the implementation of this policy will prevent the delivery of other policies in the Local Plan or have an impact on the viability of development, evidenced by its successful delivery at development already.

Other general comments relating to Chapter 5

Summary of main issues raised:

Historic England highlighted the need for a stronger and more proactive approach to heritage within the Local Plan, recommending that site allocations be informed by Heritage Impact Assessments and suggesting that the Plan be underpinned by a positive heritage strategy, potentially through the preparation of a Heritage Topic Paper. Historic England also proposed the inclusion of a dedicated section addressing the historic railway area. In addition, one respondent suggested that the Local Plan should identify heritage projects to be delivered during the plan period.

How the main issues were taken into account:

Please note, "Chapter 5: Sustainable, High-quality Development" presented in the Reg 18 Consultation Draft, has been recoded and renamed "Chapter 4: High-quality Development and Placemaking" in the Regulation 19 Publication Version.

We recognise Historic England's concerns over the chapter and the evidence base for the Local Plan. To support the Regulation 19 Local Plan, the Council has produced a Heritage Impact Assessment (2026) which assesses the impact of potential site allocations on the significance and setting of the borough's heritage assets. In these assessments, Design and Conservation and County Archaeology officers have come to a judgement over whether a site is appropriate for allocation, and this in turn has been a crucial part of the site selection process. Where officers have found that a potential site allocation would present harm to heritage assets, they have recommended mitigation measures and enhancement opportunities. These measures have been included in the amendments made to the site allocation policies, SDA01-13. We believe that this as well as other amendments made to policies SD7 and SD8 have helped to establish a 'positive strategy for the conservation and enjoyment of the historic environment' through the Plan.

Although we acknowledge Historic England's recommendation that the Council should prepare a Heritage Topic Paper, it is important that Local Plans are based on proportionate evidence, and it was considered that this would be disproportionate for Swindon.

Further, we understand Historic England's support for a distinct section on the historic railway area within the Plan. While a distinct section has not been created, Part 6 of Policy SD7 supports proposals that build upon the legacy of the Swindon Heritage Action Zone where they align with other policy criteria.

Moreover, the Council understands the respondent's suggestion for the Local Plan to provide a list of heritage projects. However, for Local Plans to be found 'sound', policies must be effective in that they should be deliverable over the plan period. It would be challenging to set out a list of deliverable heritage projects, considering that they can be dependent on external factors. Parts 5 and 6 of Policy SD7 do however outline the Council's support for heritage projects, including those that would bring 'at risk' buildings back into use.

Chapter 6: Places for People

SP2: Homes for the Community

Summary of main issues raised:

Respondents generally supported the use of the standard method as the basis for calculating local housing need. However, many respondents, particularly those representing the development sector, argued that the housing requirement should be expressed as a minimum figure and set above the identified local housing need to support economic growth, address affordable housing needs, account for unmet needs from neighbouring authorities, including Wiltshire, Cotswold and Vale of White Horse, and reflect historic levels of housing provision within the Borough.

Respondents also expressed concerns that the proposed plan-making timetable may not deliver a 15-year plan period from adoption and suggested extending the plan period, with a corresponding increase in the overall housing requirement. Some respondents further recommended that the housing requirement be reviewed and updated as new evidence becomes available.

A significant proportion of responses focused on the robustness of the housing supply strategy. Respondents raised concerns that the Plan relies heavily on large strategic sites, many of which face complex land assembly, infrastructure and delivery challenges, as well as allocations carried forward from the adopted Swindon Local Plan 2026 that have yet to be implemented. Concerns were also expressed regarding assumptions around site delivery, including the treatment of sites with planning permission, viability challenges associated with Town Centre and Urban Regeneration Area sites, the limited allocation of small and medium-sized sites, and the Plan's reliance on windfall development. Several respondents suggested that additional sites should be allocated and that measures should be introduced to accelerate build-out rates and prioritise infrastructure delivery.

Respondents also sought greater clarity and consistency regarding the sources of housing supply, including the relationship between Policy SP2, the supporting text, Appendix 3, the spatial strategy and identified strategic growth locations. Requests were made for more detailed site-specific trajectories and clearer evidence demonstrating how the housing requirement would be met.

Concerns were additionally raised regarding the adequacy of the Plan's supply buffer. Respondents noted that the Five-Year Housing Land Supply Statement published alongside the Regulation 18 consultation did not demonstrate a sufficient level of supply and argued that a larger buffer should be included, with some specifically advocating a 10% buffer. Finally, Swindon Borough Council's Build a Green Swindon Policy Performance Committee suggested that the policy should set

out a minimum affordable housing requirement and include stronger links to the Plan's climate-related policies.

How the main issues were taken into account:

Please note, “Policy SP2: Homes for the Community” presented in the Reg 18 Consultation Draft, has been deleted and replaced with “Policy HC1: Meeting Local Housing Needs”.

This was to avoid duplication and to improve the clarity of the plan. Policy HC1: Meeting Local Needs establishes the Borough's housing requirement which is the minimum number of homes the Plan seeks to provide over the plan period. The housing requirement has been kept under review during the plan making and has been updated for the Regulation 19 publication version to include the latest inputs for the Standard Method. The base date of the plan period for the purpose of the Housing Requirement has consequently been updated to 25/26 in line with the inputs. This also ensures that the plan is forward looking, following advice from the PINS advisory visit.

The housing requirement has been determined using the Government's standard method which assesses the local housing need. The housing requirement has not been set above this due the spatial strategy supporting the delivery of homes alongside employment and economy policies ensuring economic ambitions. We are actively engaging with neighbouring authorities, and they have not requested that we meet their unmet need.

Historic delivery rates and housing completions have been considered through the plan evidence base and housing trajectory. HC3: Affordable Housing seeks to maximise the delivery of affordable homes through new development. The evidence does not indicate that increasing the overall housing requirement is justified to address meeting affordable housing needs. Existing allocations have been reassessed to determine if they remain suitable and only those have been carried forward. The housing trajectory has been reworked and further evidence gathered to understand the deliverability and developability of each site allocated. This has resulted in additional sites being allocated following the 2025 CFS and SHELAA update.

Assumptions regarding windfall and non-implementation have been carefully reconsidered and considered robust, as set out in the Housing Delivery Topic Paper. Sites allocated in the town centre are expected to come forward in the mid and late plan period. A Town Centre Viability Topic Paper has been prepared in support of their allocation. The Five-Year Housing Land Supply published alongside the Regulation 18 consultation represents the position at that point in time and will be updated as the plan progresses.

The plan has been prepared in accordance with the 2024 NPPF requirements for maintaining an appropriate buffer to the five-year housing land supply. A 5% buffer has been applied, with higher buffers applying only where circumstances are outlined in national policy. A 10% buffer is therefore not considered necessary or justified.

Policy HC1 supporting text refers to the Spatial Strategy and the Sustainable Development Area policies and how these policies provide sufficient capacity to meet the Borough's housing requirement. Requirements for affordable housing are set out in Policy HC3. Climate policies are in Chapter 9 of the plan and was not found necessary to cross reference as climate policies apply to development generally and avoids duplication.

HC1: Housing Tenures and Sizes

Summary of main issues raised:

Respondents broadly supported the principle of providing a mix of housing types and the policy's ability to respond to changing evidence. However, comments sought greater flexibility and clarity regarding the policy's requirements, evidence base and use of market evidence, while views were mixed on the proposed concentration of 1- and 2-bedroom homes within the Swindon urban area and its potential impact on creating balanced communities. Some respondents also requested recognition of housing needs identified through Neighbourhood Plans

How the main issues were taken into account:

Please note, "Policy HC1: Housing Tenures and Sizes" presented in the Reg 18 Consultation Draft, has been recoded to "HC2: Housing Tenures and Sizes" in the Regulation 19 Publication Version. The policy has been improved to be more flexible regarding different housing mixes. All residential developments are encouraged to provide a balanced mix of tenures, sizes and types that reflect the local housing needs assessment and the Council's Housing department based on the most up to date evidence of need at the time of the application. The supporting text has been amended to provide clearer explanation of the evidence base and policy expanded to provide clearer requirements. 'Sub-area analysis' has been removed from the policy. The policy remains flexible in the delivery of 1 and 2 bedroom properties within the Swindon urban area, only requiring where practical and allowing site specific circumstances to justify an alternative approach. Neighbourhood Plans have not been referenced to within this policy as it is intended to provide a Borough-wide approach. Neighbourhood plans already form part of the development plan and will be considered when determining planning applications.

HC2: Affordable Housing

Summary of main issues raised:

Respondents generally supported the principle of delivering affordable housing and recognised its importance in meeting identified housing needs. However, a significant number of respondents questioned whether the proposed requirement for 30% affordable housing, including the expectation that 78% of affordable homes should be delivered as Social Rent, was adequately justified by the evidence base. In particular, respondents queried whether the Local Housing Needs Assessment provides a sufficiently comprehensive assessment of affordable housing needs, noting that it does not fully consider the need for affordable home ownership products.

Many respondents also raised concerns regarding the deliverability and viability of the proposed requirements. Respondents questioned whether the policy had been adequately tested through the Viability Assessment and suggested that greater flexibility should be incorporated to address circumstances where affordable housing requirements may affect scheme viability. Comments also highlighted the need for flexibility in the range of affordable housing tenures that can be delivered, with some respondents suggesting that discounted market sale products should be accepted where there is insufficient interest from Registered Providers in acquiring Social Rent units. One respondent further questioned whether the requirement for affordable housing to remain affordable in perpetuity is consistent with national policy.

Several respondents argued that the overall housing requirement should be increased to help meet affordable housing needs, citing the relatively low levels of affordable housing delivery achieved in recent years. Respondents considered that a higher level of housing growth could play an important role in addressing current and future affordable housing demand.

A number of respondents also sought clarification on specific aspects of the policy's operation, including the development thresholds at which affordable housing requirements would be triggered. Concerns were also raised regarding the policy's First Homes provisions, with one respondent suggesting that the proposed eligibility criteria may be overly restrictive.

In addition, BSW Integrated Care Board highlighted the need for the Plan to give greater consideration to the affordable housing needs of key workers. Overall, while there was broad support for the objective of increasing affordable housing provision, respondents sought further justification for the proposed tenure split, greater flexibility in implementation, and additional clarity regarding the policy's practical application.

How the main issues were taken into account:

Please note, “Policy HC2: Affordable Housing” presented in the Reg 18 Consultation Draft, has been recoded to “Policy HC3: Affordable Housing” in the Regulation 19 Publication Version. The supporting text has been updated and reflects the most up to date Local Housing Need Assessment (2026) (LHNA) figures for affordable housing types. The LHNA (2026) includes further disaggregation of the need for affordable home ownership within the affordable housing needs model. This policy has been informed by the most up to date Local Plan Viability Assessment and has been reviewed to remain consistent with national policy.

The policy is flexible, allowing housing provision to respond to the most up to date evidence of housing need. The housing requirement has been informed by the identified housing need, while the policy approach to affordable housing seeks to maximise the delivery of affordable homes through new development. The evidence does not indicate that increasing the overall housing requirement is justified to address historic levels of affordable housing.

The policy provides flexibility in the mix of affordable housing tenures, requiring provision to respond to the Council’s most up-to-date evidence of housing need and local circumstances. The policy also recognises a range of affordable housing tenures, including Social Rent, Affordable Rent and intermediate products such as Discount Market Sales. The First Homes criteria align with national policy and government guidance. The policy defines the threshold to trigger the policy requirements as ‘major developments’ which is established within the NPPF. The supporting text recognises some groups may experience difficulties in accessing suitable housing, such as key workers, and will work with partners to support the delivery of appropriate housing.

HC3: Accessible Housing

Summary of main issues raised:

Respondents generally supported the principle of increasing the provision of accessible and adaptable housing to meet a range of housing needs. However, respondents representing the development sector questioned whether the requirements for new homes to comply with Building Regulations M4(2) and M4(3) standards were sufficiently justified by the evidence base. Concerns were also raised regarding the potential implications of these requirements for development viability and the ability of some sites to accommodate the standards due to site-specific constraints.

Respondents also sought greater clarity regarding the implementation of the policy, including the thresholds at which M4(3) standards would be required and the expectation for furnished floorplans to be submitted. While most comments focused on deliverability and justification, one respondent argued that the proportion of

homes required to meet M4(3) standards should be increased to 10% in order to better address the needs of people requiring wheelchair-accessible housing.

How the main issues were taken into account:

Please note, “Policy HC3: Accessible Housing” presented in the Reg 18 Consultation Draft, has been recoded to “Policy HC4: Accessible Housing” in the Regulation 19 Publication Version.

Concerns regarding the accessibility requirements have been addressed through revised supporting text which references national Planning Practice Guidance and evidence from the Local Housing Needs Assessment which identifies a significant need for accessible and adaptable homes including wheelchair-user dwellings across the Borough. The policy has also been amended to provide greater clarity regarding the delivery of Wheelchair user dwellings, requiring a minimum of 10% of all dwellings on proposals for major development to meet M4(3) standard. In response to the comment regarding furnished floorplans, the policy has been simplified by removing detailed technical requirements relating to through-lifts and furnished floorplans with greater emphasis on meeting the relevant Building Regulations accessibility standards.

HC4: Specialist Housing

Summary of main issues raised:

Respondents raised a range of concerns regarding how specialist housing needs would be addressed through the policy. Several respondents noted that the policy focuses primarily on housing for older people and does not adequately address the provision of specialist accommodation for children and young people. Many respondents also considered that the policy lacks a clear strategy for meeting identified needs for older persons' housing, suggesting that it should include site allocations, locational criteria identifying suitable areas for specialist accommodation, or greater flexibility through an exception mechanism to support delivery in locations where residential development would not normally be permitted.

Respondents also sought greater clarity regarding the different forms of specialist housing for older people. Concerns were raised that the policy does not sufficiently distinguish between different accommodation types and care models, including whether all forms of specialist older persons' housing should be treated as Use Class C2 and whether the same policy requirements are appropriate across all specialist housing types.

Deliverability and viability emerged as significant themes within responses. Several respondents questioned the requirement for 30% affordable housing provision within specialist housing schemes, while others raised concerns regarding the requirement

for 50% of units to meet M4(3) wheelchair-user standards. Respondents argued that these requirements could affect viability and may not be appropriate for all forms of specialist accommodation. One respondent also raised detailed concerns regarding the way specialist housing for older people had been assessed through the Viability Assessment and whether the evidence adequately supports the proposed requirements.

Several agents and land promoters also put forward sites for specialist housing development, reflecting support for increased provision where suitable opportunities exist. In addition, Swindon Borough Council's Adult Services Team sought greater clarity regarding the terminology used throughout the policy and questioned whether the level of detail within some policy requirements was appropriate and sufficiently precise to support implementation.

How the main issues were taken into account:

Please note, "Policy HC4: Specialist Housing" presented in the Reg 18 Consultation Draft, has been recoded and renamed to "Policy HC5: Specialist Housing including Housing for Older People" in the Regulation 19 Publication Version.

Respondents raised concerns regarding the scope of the policy, the approach to meeting identified needs for specialist housing, the distinction between different forms of specialist accommodation and the accessibility, affordability and viability requirements of the policy. These issues have been taken into account in preparing the Regulation 19 version of the Plan. The policy has been expanded to support a broader range of specialist housing needs including housing for older people, accommodation for looked after children and other groups requiring specifically designed accommodation.

The supporting text has been revised to provide greater clarity regarding the different forms of specialist housing for older people, including sheltered and retirement housing and extra care accommodation for individuals with additional care needs. It also sets out the identified need for these forms of accommodation over the plan period.

The revised policy also provides a clearer framework for proposals for specialist housing, which will be supported where they meet an identified local need and are located in sustainable locations where the accommodation is appropriate for its intended residents.

In response to concerns regarding deliverability and viability, the proportion of dwellings required to meet M4(3) 'wheelchair user dwellings' has been reduced from 50% to 35% whilst retaining the requirement that all dwellings must meet M4(2) standards.

HC5: Houses in Multiple Occupation and Sub-Division

Summary of main issues raised:

Respondents generally supported the principle of managing the impacts of Houses in Multiple Occupation (HMOs), with some expressing strong support for the introduction of a policy to address concerns associated with their concentration and operation. However, a number of respondents considered that the policy does not go far enough to prevent excessive concentrations of HMOs and suggested the introduction of a threshold or limit for the proportion of HMOs within a particular area.

Concerns were also raised regarding the effectiveness and implementation of the policy. One respondent considered that the policy criteria are insufficiently robust and clear and may prove difficult to apply consistently in decision-making. Similarly, Swindon Borough Council's Transport Development Management Team raised concerns that aspects of the policy wording are ambiguous and may conflict with the requirements of the adopted Parking Standards 2021. Overall, while respondents generally supported the objective of managing HMO impacts, they sought stronger controls, greater clarity and improved consistency with existing planning and transport policies.

How the main issues were taken into account:

Please note, "Policy HC5: Houses in Multiple Occupation and Sub-Division" presented in the Reg 18 Consultation Draft, has been recoded to "Policy HC6: Houses in Multiple Occupation and Sub-Division" in the Regulation 19 Publication Version.

We recognise the concerns expressed by several respondents over the negative impacts of HMOs and the support for a policy to manage their impacts. High concentrations of HMOs can impact on neighbouring homes' amenities e.g. parking, traffic and bins, and can harm the character of the area. We understand the concerns raised that the policy did not seek to prevent concentrations of HMOs, for example, through introducing a threshold for the number of HMOs in a given area. The policy has been amended to include Part 2 a. which establishes a 20 per cent threshold that proposals for HMOs must not exceed.

Further, we agree with the respondent's concerns over the robustness of the policy, particularly Part 1 a. and b. In determining planning applications, these criteria would be difficult to implement and would perhaps not stand up at appeal. These criteria have therefore been removed from the policy.

Moreover, we understand the Transport Development Management team's issue that the policy wording is ambiguous, particularly regarding Part 1 d. and the term 'area of high transport accessibility'. This phrase does not use the wording 'sustainable transport' and so it is unclear exactly what kind of transport is being referred to. Part

2 b. has been amended to include this wording, and the supporting text explains what the Council considers an 'area of high sustainable transport accessibility'. Further, in order for the policy to better align with the Council's adopted Parking Standards for New Development (2021), a new criterion has been added at Part 1 c. which seeks for proposals for HMOs and the subdivision of existing dwellings to adhere to said standards.

HC6: Rural Exception Sites and Rural Worker Dwellings

Summary of main issues raised:

Respondents generally supported the policy's objectives, although a number of comments sought greater flexibility in its implementation. In particular, respondents from the development sector argued that affordable housing tenure requirements on rural exception sites should be applied on a case-by-case basis to ensure that they do not undermine the viability or delivery of affordable housing schemes.

Respondents also suggested that local affordable housing needs should be capable of being demonstrated through a range of evidence sources, including the Council's housing register, rather than relying on a single assessment method.

In addition, respondents highlighted opportunities to broaden the scope of the policy, with one respondent suggesting that greater support should be given to self-build and custom-build housing on rural exception sites as a means of increasing housing choice and delivery in rural areas. Overall, respondents were supportive of the policy's intent but sought greater flexibility and clarity to support its effective implementation.

How the main issues were taken into account:

Please note, "Policy HC6: Rural Exception Sites and Rural Workers Dwellings" presented in the Reg 18 Consultation Draft, has been recoded to "Policy HC7: Rural Exception Sites and Rural Workers Dwellings" in the Regulation 19 Publication Version.

We acknowledge the respondent from the development sector's proposals for additions to the policy. The Council believes that the policy is sufficiently flexible with regards to the affordable housing tenure mix on rural exception sites, as the policy itself does not state what affordable housing tenure mix is required for proposals. Moreover, the Council acknowledges the respondent's suggestion regarding Part 2 a., however it was decided that this part of the policy would be kept much the same. An up-to-date housing needs assessment is an important document which should be used for assessing the local identified need for housing for different groups, including for this policy.

Further, we recognise the respondent's suggestion that the policy should encourage self and custom-build houses on rural exception sites. The Council does not believe

this it is necessary to state this in the policy. The Local Plan should be read as a whole, and Policy HC8 Self and Custom Build Housing states that proposals for self and custom-build housing will be supported in principle provided that they align with criteria, including that they are delivered in accordance with policies in the development plan. As such, policies HC7 and HC8 on rural exception sites and self and custom-build housing can be implemented in conjunction where appropriate.

HC7: Self and Custom Build Housing

Summary of main issues raised:

Respondents expressed a range of views on the policy, with some supporting its objectives while others raised concerns regarding its implementation and consistency with national policy. The Home Builders Federation objected to the requirement for larger residential developments to provide self-build and custom-build plots, arguing that the policy should instead identify circumstances where such development would be supported or allocate specific sites for that purpose. It also suggested that the requirement is inconsistent with paragraph 129 of the NPPF (2024), which promotes the efficient use of land.

Similar concerns were raised by several respondents from the development sector, who questioned the requirement for Strategic Growth Locations, particularly within the Central Area, to deliver self-build and custom-build housing. Respondents expressed concerns that such requirements may be challenging to accommodate within higher-density and mixed-use schemes and could affect the efficient delivery of strategic sites.

In contrast, Swindon Borough Council's Build a Greener Swindon Committee supported a stronger sustainability focus, suggesting that self-build and custom-build homes should be constructed using sustainable materials and low embodied-carbon construction methods. Overall, respondents sought greater flexibility in how self-build and custom-build housing is delivered, while also highlighting the need to balance self-build provision with wider land-use efficiency and sustainability objectives.

How the main issues were taken into account:

Please note, "Policy HC7: Self and Custom Build Housing" presented in the Reg 18 Consultation Draft, has been recoded to "Policy HC8: Self and Custom Build Housing" in the Regulation 19 Publication Version.

We understand the Home Builders Federation's concerns over the policy, especially the promotion of self- and custom-build houses coming forward on large-scale residential developments. However, the requirement for large-scale development to deliver serviced plots is important will help the borough to meet its identified need for self and custom-build serviced plots.

The Council does not expect that this is the only way that serviced plots may come forward. Part 1 of the policy outlines the criteria that proposals for self and custom-build housing must meet to be supported in principle. This allows for serviced plots to also come forward on smaller sites. Further, the policy has been amended to include Part 4 which sets out how serviced plots should come forward on large-scale developments to ensure that they are delivered in a timely fashion, are clustered together, and have road access from the earliest opportunity. The Council does not believe that promoting serviced plots coming forward on large-scale developments goes against national policy. Part 7 of the policy outlines how vacant plots will be treated, thus ensuring that the Council is making efficient use of land.

Moreover, we understand several respondents' issue with the policy requiring Strategic Growth Locations to consider opportunities to deliver serviced plots. The Council agrees that this is an unnecessary addition, especially given the policy's requirement for large-scale residential developments to deliver serviced plots, and so it has been removed.

We recognise the Build a Greener Swindon Committee's suggestion that the policy should require self and custom-build houses to be made from sustainable materials with low embodied carbon. However, the Council does not believe this it is necessary to state this in this policy. The Local Plan should be read as a whole, and policies CSE2 and CSE3 set out expectations and requirements of development in terms of their materials and embodied carbon.

HC8: Gypsy, Traveller and Travelling Showpersons' Accommodation

Summary of main issues raised:

Respondents expressed a range of views on the policy. Wiltshire Council welcomed the policy approach, including the proposed pitch allocations and the criteria-based policy for assessing windfall sites, while also recognising the need to plan for outstanding accommodation needs. West Berkshire Council sought greater clarity regarding the classification of sites intended for Gypsies and Travellers and those intended for Travelling Showpeople.

Environmental considerations were also raised by statutory consultees. Natural England raised no objections to the three potential pitches identified within the policy but recommended stronger safeguards for biodiversity and designated landscapes. In particular, it suggested clearer policy wording relating to habitat protection and closer engagement with the North Wessex Downs National Landscape team.

Several respondents raised concerns regarding whether the policy provides sufficient provision to meet Gypsy and Traveller accommodation needs, highlighting an ongoing shortage of sites and suggesting that additional provision may be required. Overall, while there was support for the policy's approach to identifying

sites and managing future provision, respondents sought greater clarity, stronger environmental protections and further consideration of unmet accommodation needs.

How the main issues were taken into account:

Please note, “Policy HC8: Gypsy, Traveller and Travelling Showpersons’ Accommodation” presented in the Reg 18 Consultation Draft, has been recoded to “Policy HC9: Gypsy, Traveller and Travelling Showpeople’s Accommodation” in the Regulation 19 Publication Version.

We recognised that the policy was lacking clear explanation of allocated sites for both Gypsy and Travellers and Travelling Showpeople community. The policy has been amended to provide greater clarity on the type of accommodation to be delivered at each allocated site. A table has been added to Policy HC9 which clearly identifies the sites allocated for Gypsies and Travellers and the site allocated for Travelling Showpeople, together with the potential number of pitches/plots at each site. This provides a clear distinction between the two types of accommodation and addresses the concern raised.

The Council recognises that some respondents raised concerns regarding a potential shortage of sites to meet Gypsy and Traveller accommodation needs. The need for Gypsy, Traveller and Travelling Showpeople accommodation has been assessed through the Council’s Gypsy and Traveller Accommodation Assessment (GTAA), which provides the evidence base for the number of pitches and plots required for each community. The site allocations in Policy HC9 have been informed by the identified need, with separate provision identified for Gypsies and Travellers and for Travelling Showpeople. The policy therefore seeks to ensure that the accommodation needs identified through the GTAA are appropriately addressed through the Local Plan.

Other general comments relating to Chapter 6

Summary of main issues raised:

Respondents raised concerns regarding the consistency of the housing supply information presented throughout the Plan, noting apparent discrepancies between the supporting text, Appendix 4 and the Annual Monitoring Report (2024/25). Respondents therefore sought greater clarity and consistency regarding the sources of housing supply and how these contribute to overall housing delivery.

In addition, respondents suggested that the Plan should address a broader range of housing-related issues. In particular, comments highlighted the role of Housing Associations in supporting the delivery of affordable housing and suggested that greater consideration should be given to the provision of executive housing to meet a wider range of housing needs within the Borough.

How the main issues were taken into account:

The monitoring framework has been updated providing a monitoring indicator per policy consistent with sources within the supporting text. The Annual Monitoring Report will reflect these changes in the next monitoring year. Policy HC3 refers to Registered Providers within the supporting text and how the Council will work with them to maximise the delivery of affordable housing and support housing opportunities for key workers. The Local Plan housing requirements are informed by the Local Housing Needs Assessment, which identifies the household types expected to experience the greatest growth. Policy HC2: Housing Tenures and Sizes responds to these identified needs while ensuring a mix of tenures and sizes is also delivered.

Chapter 7: An Economically Thriving Swindon

SP4: Fairer, Economic Growth

Summary of main issues raised:

Respondents generally supported the policy's approach to safeguarding employment land. However, some respondents suggested that the policy should place greater emphasis on promoting the Town Centre as a location for business development, while others questioned whether some proposed employment allocations are located in sustainable and accessible locations.

Thames Valley Chamber of Commerce supported the continued protection of existing employment land but raised concerns that the Plan does not allocate any new major employment sites. Overall, while there was support for the principle of safeguarding employment land, respondents sought a stronger focus on business growth opportunities and the provision of additional employment land to support future economic development.

How the main issues were taken into account:

Please note, “Policy SP4: Fairer, Economic Growth”, presented in the Reg 18 Consultation Draft, has been removed as a standalone policy. This was to avoid duplication and to improve the clarity of the plan. Its approach has been incorporated into the revised economic policies, principally “E1: Economic Strategy and Meeting Employment Needs”, “E2: New Employment Sites” and “E3: Designated Employment Areas” in the Regulation 19 Publication Version.

We acknowledge the support for the policy and the request to strengthen the role of the Town Centre as a business location. This has been addressed through Policy E1, which prioritises the Town Centre for larger-scale office development through the sequential approach for larger-scale office development.

We have also taken account of Thames Valley Chamber of Commerce in terms of review of safeguarding of employment land and understand their concerns regarding the supply and allocation of new employment land.

Production of the Reg 19 Plan has involved a comprehensive review of existing employment areas, modelling of future land and floorspace requirements, and includes an evidence base strengthened by the 2025 Swindon Employment Needs and Land Supply study.

Policy E2: New Employment Sites highlights new employment land designations, providing opportunities for office, research and development, industrial, warehousing and data centre uses in locations appropriate to meet employment needs and support sustainable growth.

FE1: Office (Scale and Location)

Summary of main issues raised:

Stagecoach West and Swindon's Bus Company supported the policy's approach to promoting office development within Swindon Town Centre and the station area, recognising the benefits of locating employment in accessible, sustainable locations. They highlighted accessibility challenges associated with out-of-town office developments and suggested that these sites should be considered for future redevelopment. Support for the policy's emphasis on Town Centre office development was also expressed by a respondent from the development sector.

How the main issues were taken into account:

Policy FE1: Office (Scale and Location), presented in the Reg 18 Consultation Draft, has been recoded to "Policy E1: Employment Land Strategy" in the Regulation 19 Publication Version. This policy has been substantially rewritten and broadened.

While Policy FE1 focused specifically on the scale and location of office development, Policy E1 now sets out the overall employment land strategy, including provision for 72,000sqm of office and 640,000sqm of industrial floorspace, employment land allocations and sector priorities. The sequential approach has been retained within the revised policy, with larger-scale office development directed first toward Swindon Town Centre and the Central Area, followed by the wider urban area along key public transport corridors and finally peripheral locations.

We acknowledge the support from Stagecoach West, Swindon Bus Company, and the development sector for the advocacy of office development in the Town Centre and station area, and recognise concerns raised regarding the accessibility of out-of-town office locations.

In response, the revised Reg 19 Policy E1 retains and adapts the core approach of FE1, now directing office development toward more accessible locations while incorporating it within a broader strategy for meeting Swindon's employment land requirements. Furthermore, while the recommendation that low-density out-of-town office campuses be identified for residential or higher-density development, to support redirection of employment activity toward the Town Centre, has been considered as part of the Reg 19 review, this approach has not been incorporated into Policy E1. Instead, the Policy retains a sequential approach to the location of new office development. This provides a mechanism for prioritising more accessible central locations.

FE2: Industrial Land (Scale and Location)

Summary of main issues raised:

Respondents generally supported the policy's approach to safeguarding employment land and allowing a degree of flexibility through the inclusion of sui generis and

temporary uses within employment allocations. However, several respondents from the development sector sought greater clarity regarding the types of uses that would be supported on allocated employment land and argued that the policy is overly restrictive in specifying acceptable uses. These respondents considered that parts of the policy may not align with national planning policy and could limit the flexibility required to respond to changing market demands.

Respondents also objected to the inclusion of some employment allocations that contain existing non-industrial uses and raised concerns that the requirement in Part 5 to achieve no net loss of industrial and warehousing floorspace could unduly constrain redevelopment opportunities. Concerns were expressed that this requirement may restrict the ability to bring forward alternative employment-generating uses where these may be more appropriate or viable.

Network Rail supported the safeguarding of Hawksworth Depot and Swindon Sidings for railway-related purposes but suggested that the naming of these safeguarded sites should be amended to improve accuracy and clarity. Overall, while there was support for the principle of protecting employment land, respondents sought greater flexibility, clearer guidance on acceptable uses and a more balanced approach to managing employment floorspace.

How the main issues were taken into account:

“Policy FE2: Industrial Land (Scale and Location)”, presented in the Reg 18 Consultation Draft, has been renamed and recoded to “Policy E3: Designated Employment Areas” in the Regulation 19 Publication Version. This policy has been substantially rewritten. It now provides greater clarity on the uses considered acceptable within Designated Employment Areas, explicitly identifying B2, B8, E(g)(ii) and employment-related Sui Generis uses. E(g)(i) office uses are also addressed through a cross-reference to Policy E1.

We acknowledge support offered for safeguarding employment land and allowing Sui Generis and temporary uses. In response, the Reg 19 Plan continues to protect Designated Employment Areas for employment uses and related functions, while supporting intensification, redevelopment and modernisation where appropriate. Temporary use of vacant building and sites for up to three years have also been retained.

We understand concerns raised that the Reg 18 Consultation Draft Policy appeared too restrictive, particularly in relation to the loss of employment land. In response, the Part 5 requirement for no net loss of industrial and warehousing floorspace has been replaced with a viability and marketing test, requiring evidence that employment is no longer viable and that there is no market interest following 12 months of active marketing, alongside consideration of the impact on Central Area regeneration. This

provides a more flexible approach to the potential release of employment land. Concerns regarding allocations containing existing non-industrial uses have also been acknowledged through a review of Designated Employment Areas. The Reg 19 Plan identifies specific areas to which the safeguarding and acceptable-use provisions apply, while a review has also been undertaken to check boundaries against current land uses and amend accordingly.

Moreover, we acknowledge Network Rail's support for safeguarding Hawksworth Depot and Swindon Railway Sidings. In response, Policy E3 now specifically safeguards these sites as railway sidings important for freight movement capabilities, reflecting the representation made at Reg 18.

FE3: Network and Hierarchy of Centres

Summary of main issues raised:

Stagecoach West and Swindon's Bus Company supported the policy and its approach to promoting retail, leisure and other town centre uses within local centres. However, they recommended that the policy should explicitly identify the Borough's Local Centres to provide greater clarity and support consistent implementation.

A respondent from the development sector also raised concerns regarding the policy's requirement for leisure development proposals to be supported by an impact assessment. The respondent questioned the justification for applying a floorspace threshold that differs from that set out in national policy and suggested that any deviation should be supported by a clear evidence base. Overall, while respondents were generally supportive of the policy's objectives, comments focused on improving clarity and ensuring policy requirements are proportionate and evidence-led.

How the main issues were taken into account:

Please note, "Policy E3: Network and Hierarchy of Centres", presented in the Reg 18 Consultation Draft, has been recoded to "Policy E5: Network and Hierarchy of Centres" in the Regulation 19 Publication Version.

We recognise Stagecoach West and Swindon Bus Company's support for the policy and acknowledge their suggestion that Local Centres be identified to provide clarity and effectiveness in implementation. In response, the policy now refers to Local Centres as identified in Table 5, which provides a specific list of Local Centres identified through the Council's 2023 audit.

Further to this, we also recognise the development sector's concern regarding the requirement for retail and leisure impact assessments and the policy's approach to the 600sqm threshold, which differs from the national policy approach. We consider such assessments necessary to evaluate the extent to which larger-scale development outside of designated centres may adversely affect the vitality and

viability of existing centres, including through impacts on trade, consumer choice, and planned investment. The 600sqm threshold, derived from the 2024 Retail and Leisure Study, has been retained in response to the 2024 Retail and Leisure Study, and their recommendation of its continued use to ensure the new main town centre uses are directed firstly toward designated centre boundaries.

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

Summary of main issues raised:

A respondent from the development sector raised concerns that the policy could undermine the Plan's wider urban regeneration objectives and sought greater clarity on how the policy would operate in practice. In particular, the respondent queried the meaning of the term "significant adverse impact" and requested further guidance on the criteria that would be used to assess and determine such impacts.

How the main issues were taken into account:

Please note, "Policy FE4: Development in Town Centres, District/Rural Centres and Local Shopping Parades", presented in the Reg 18 Consultation Draft, has been recoded to "Policy E6: Development in Town Centres, District/Rural Centres and Local Shopping Parades" in the Regulation 19 Publication Version.

We recognise the development sector's concern that the policy may undermine the Plan's promotion of urban regeneration. In response, the Reg 19 Plan supporting text has been strengthened to provide greater clarity on the changing nature of town centre uses and the need to support a wider mix of uses. Policy E6 sets out the types of development and uses that are sought within Town Centres, Urban District Centres and Primary Rural Centres, whilst also establishing requirements to ensure that new development is appropriate to the character and function of the centre. This approach is intended to promote distinct uses across the centres hierarchy, and to ensure that regeneration and investment are direct to appropriate and sustainable locations.

The Reg 19 Plan supporting text has been further strengthened to explicitly acknowledge the changing role of town centres and need for a positive approach to structural changes affecting retail and leisure. It also identifies the need to manage concentrations of particular uses, including betting and payday loan shops, and recognises the relationship between these uses, residential amenity, schools and health inequality. This provides greater explanation of how Policy E6 is intended to support regeneration whilst both maintaining the role and function of the centres hierarchy and limiting significant adverse impacts.

Our approach to regeneration is informed by the 2024 Retail and Main Town Centre Uses Needs Study. This identified significant vacancy within Swindon Town Centre and recommended a focus on improve the quality of the existing offer and toward

bringing vacant floorspace back into productive use. The Reg 19 Plan therefore supports a more flexible approach to the changing mix of town centre uses, whilst retaining the hierarchy to ensure that development is located in appropriate and sustainable centres.

We understand the request for greater clarity regarding the term 'significant adverse impact' and the criteria that may be considered in identifying such. The Council has retained the requirements regarding living conditions, traffic flow and road safety within Policy E6 as the potential effects of development on such will vary according to the scale, nature, and location of individual proposals.

The Reg 19 policy therefore continues to require development to avoid significant adverse impacts, rather than introducing a threshold which may not be appropriate to all circumstances. For example, consideration may be given to whether a proposal would result in changes in living conditions to neighbouring residents, create additional traffic activity that may affect the surrounding transport network, or give rise to safety concerns. We consider that this provides a clear basis for assessing whether an impact is significantly adverse, and the necessary flexibility to apply the policy proportionately to the circumstances of individual proposals.

FE5: Concentration of Uses

Summary of main issues:

Bath and North East Somerset, Swindon and Wiltshire Integrated Care Board (BSW ICB) supported the inclusion of Policy FE5 and its focus on addressing health impacts associated with hot food takeaways. However, BSW ICB recommended strengthening the policy by explicitly referencing Swindon's Whole Systems Approach to Healthy Weight Strategy 2023-2033, particularly Priority 1 relating to improving the food environment and making healthy food choices easier. BSW ICB considered that linking the policy to this adopted health strategy would help demonstrate its justification and support its examination by the Planning Inspectorate. The organisation also highlighted the role that health-promoting retail uses can play around healthcare and community facilities in encouraging healthier behaviours, and recommended that the policy should place greater emphasis on engagement with relevant NHS bodies and health authorities.

A respondent from the development sector questioned the requirement for a Health Impact Assessment (HIA) to accompany all planning applications involving hot food takeaways, arguing that this may be disproportionate where the proposed use is unchanged from an existing or already-permitted use, or where development is located away from residential areas. The respondent therefore sought amendments to the policy to ensure that its requirements are proportionate and appropriately targeted.

How the main issues were taken into account:

Please note, “Policy FE5: Concentration of use, presented in the Reg 18 Consultation Draft, has been recoded to “Policy HL2: Concentration of Uses and moved from “Chapter 7: An Economically Thriving Swindon to “Chapter 9: A Healthy and Social Swindon” in the Regulation 19 Publication Version.

We acknowledge the support from Bath and North East Somerset, Swindon, and Wiltshire Integrated Care Board for the inclusion of policy FE5. We also recognise the concern raised by the development sector that the requirement for a Health Impact Assessment (HIA) for all planning applications involving fast food outlets may be unreasonable where the proposed use is the same as an existing or already-permitted use or where the site is located away from residential areas.

In response, the requirement for a HIA has been retained, as the potential health impacts of fast-food outlets extend beyond residential amenity. The Reg 19 Plan recognises that concentrations of fast-food outlets can contribute negatively toward health inequalities and considers it appropriate for their potential impact to be assessed irrespective of whether the use is already established or the site is located away from residential areas.

The Reg 19 Plan’s updated Policy HL1 Health Impact Assessments provides a mechanism for this assessment, while the supporting text to Policy HL2 itself clarifies that the level of detail required in a HIA should be proportionate to the scale of development and agreed with the case officer.

Please note, the Reg 18 Consultation Draft requirement that proposals for the relevant uses should not be permitted within 400 metres of existing schools has been removed from Policy HL2 in the Reg 19 Plan. Instead, the consideration of health impacts associated with hot food takeaway outlets in proximity to areas where young people frequently congregate, including schools, is now addressed through Policy HL1 Health Impact Assessments, which requires an HIA for these proposals where they are within 400 metres or a 10-minute walking distance of such locations.

Furthermore, we acknowledge the Integrated Care Board’s recommendation that the policy should reference Swindon’s Whole Systems Approach to Healthy Weight Strategy 2022-2023, particularly Priority 1 regarding improving the food environment and making healthy food choices easier to access. While the strategy is not specifically referenced within the Reg 19 Plan policy, the supporting text has been strengthened to provide a clearer explanation of the health and health inequality considerations underpinning the policy. It identifies the potential contribution of harmful retail uses, including fast-food outlets, to poor diets and inequality, and explains the relationship between the policy and wider objectives of improving health and reducing such inequality. Policy HL1 provides a framework for considering access to healthy food as a determinant of health through the HIA process.

Moreover, we have considered the recommendation from the Integrated Care Board that health-promoting retail uses should be encouraged around healthcare and community facilities to support healthy behaviours among specific population groups. This has not been included as an explicit requirement with Policy HL2, as the purpose of the policy is to manage concentrations of uses that may have negative impacts on health and wellbeing. Wider health considerations, including access to healthy food, healthcare and social infrastructure, are addressed through the Policy HL1 Health Impact Assessment and wider policies within Chapter 9 A Healthy and Social Swindon.

The recommendation from respondents that the outcomes of consultation with the relevant NHS and health authorities be demonstrated has been addressed in the Reg 19 Plan through strengthened supporting text setting out the potential negative impacts of concentrations of fast-food outlets and other potentially harmful uses on wellbeing, including poor diets, increasing health inequality, and financial distress. Taken as a whole, the approach in the policy reflects the health and health inequality considerations raised through consultation, alongside the wider evidence and policy objectives informing the plan.

FE6: Evening, Night-time and Cultural Economy

Summary of main issues:

Respondents expressed mixed views on the policy. One respondent supported the concentration of night-time economy uses at the eastern end of Regent Street, recognising the benefits of directing such activity to an established night-time economy location. However, concerns were raised regarding the impact of night-time economy uses on nearby residents, with respondents emphasising that venues should operate in a manner that minimises noise and disturbance and safeguards residential amenity.

Some respondents considered that the policy does not adequately address issues arising from existing venues that already cause disturbance. Suggestions were made for a more proactive approach to managing these impacts, including the review of premises licences where complaints have been received, stronger warnings to operators where issues persist, and measures to ensure licensed venues close at reasonable hours to reduce impacts on local residents.

Theatres Trust welcomed the inclusion of the policy, particularly the provisions contained within Part 5. Overall, respondents supported the management of the night-time economy but sought stronger measures to balance its benefits with the protection of residential amenity and quality of life for local communities.

How the main issues were taken into account:

Please note, “Policy FE6: Evening, Night-time and Cultural Economy”, presented in the Reg 18 Consultation Draft, has been recoded to “Policy E7: Evening, Night-time and Cultural Economy” in the Regulation 19 Publication Version.

We acknowledge expressed support for concentrating Swindon’s evening and night-time economy around the Regent Street area. This approach has been retained in Policy E7 of the Reg 19 Plan, which continues to encourage new evening, and night-time economy uses at the Regent Street/Regent Close intersection. The supporting text has been strengthened to provide a clearer justification for this approach, identifying that Swindon Town Centre presently lacks a robust night-time economy, and, with reference to the 2024 Retail and Leisure Study, highlights opportunities to enhance provision, including food and beverage uses, and diversify the town centre through cultural and entertainment facilities. The Reg 19 Plan therefore provides a clearer evidence base for the continued focus on strengthening the evening and night-time economy within this specific location.

We recognise concerns from respondents regarding potential disturbances arising from evening and night-time economy uses. In response, Policy E7 retains the requirement for new evening, and night-time economy uses to be neighbourly and have regard to the character of the centre in which they are proposed. It also retains the Agent of Change principle, under which residential development that could put at risk the continued operation existing uses, including music venues and night clubs, will be resisted. Together, these criteria provide a framework for ensuring balance between evening and night-time economy uses and residential development, ensuring that proposed development is resisted where it could adversely affect the other use.

We have considered recommendations that the policy be amended to actively review all existing premises licensing hours where complaints have been received, and to proactively warn premises that their licence will be reviewed if improper behaviour occurs. The respondent also requested that licensed venues be mandated to close at a reasonable hour so as not to affect or disturb the sleep of residents. These recommendations have not been incorporated into Policy E7, as the review and enforcement of premises licences and specific licensing hours falls principally within the remit of the licensing regime, rather than the planning policy framework. Instead, Policy E7 addresses the planning implications of new evening and night-time economy use, including the requirement for proposals to be neighbourly and have regard to the character of the centre in which they are proposed.

We acknowledge The Theatre Trust’s support for Policy FE6, particularly Part 5 concerning the Agent of Change principle. This provision has been retained in Policy E7, reflecting its importance in protecting existing evening, night-time and cultural economy uses from the impacts of incompatible development. This supports the

continued operation of established cultural and entertainment venues and their contribution to the Swindon area.

FE7: Employment, Skills and Training

Summary of main issues:

Respondents broadly support policy FE7.

How the main issues were taken into account:

Please note, "Policy FE7: Employment, Skills and Training, presented in the Reg 18 Consultation Draft, has been recoded to "Policy: E4 Employment, Skills and Training" in the Regulation 19 Publication Version.

We acknowledge the broad support expressed for Policy FE7, which has been retained in Policy E4. This continues to require Local Employment and Skills Plans (LESPs) for major housing developments above 100 units and commercial developments above 1,000 square metres, recognising the role that new development can play in addressing local skills shortages and supporting a strong workforce to meet the needs of Swindon's growth. The Reg 19 Plan supporting text has been strengthened to include statistical evidence from employers regarding the connection between skills shortages and vacancies, supporting the retention of the requirement for Local Employment and Skills Plans for major housing developments above 100 units and commercial development above 1,000 square metres.

The Reg 19 Plan provides greater clarity on the purpose and scope of LESP's, including their role in addressing new entrant and other skills deficits within the construction and built environment sector, and, where relevant, securing sustainable jobs, apprenticeships and training opportunities associated with the occupation of commercial development. The approach therefore maintains the Reg 18 policy while strengthening its contribution to addressing identified skills needs.

Other general comments relating to Chapter 7

Summary of main issues:

Respondents generally supported the Local Plan's ambition to deliver a resilient and inclusive economy, regenerate Swindon Town Centre and improve access to jobs, services and opportunities. Support was expressed for the promotion of town centre living, the diversification of town centre uses beyond traditional retail, the reuse of vacant floorspace and the creation of a "Knowledge Central" business district. Respondents from the development sector were broadly supportive of Chapter 7, including its recognition that town centres should accommodate a wider mix of uses, whilst retaining their role as key economic, commercial and community destinations.

A significant theme concerned the future role and function of the Town Centre. Respondents supported the retention and adaptation of the Brunel Centre as a

principal focus for shopping and activity, whilst recognising the need for greater flexibility in the use of upper floors and vacant units. Support was also expressed for bringing vacant floorspace back into use and accommodating non-retail activities within the town centre. Respondents acknowledged the importance of the Tented Market but suggested that similar uses could potentially be accommodated within permanent vacant premises. Whilst respondents generally considered the existing Town Centre boundary to be appropriate, some recommended a comprehensive review to ensure the extent of the centre remains optimal.

Respondents also highlighted the importance of ensuring that all residents can access employment opportunities and services close to home through sustainable travel choices, helping to reduce reliance on private vehicles and support reductions in carbon emissions. However, concerns were raised by a respondent from the development sector that some proposed allocations identified under Policy SP4 are detached from existing urban areas and may not represent sustainable locations, potentially increasing dependency on private car travel.

Haydon Wick Parish Council raised several concerns regarding the economic development and skills agenda. While acknowledging the contribution of North Star College in providing technical training in central Swindon, the Parish Council considered that stronger links are needed between educational provision, northern growth areas and apprenticeship opportunities. It also considered that the skills agenda within the Plan remains underdeveloped and highlighted the absence of proposals for business incubators and co-working hubs, which it felt could support the growth of green technology and digital industries. In addition, Haydon Wick Parish Council argued that the role of the Orbital Shopping Park within North Swindon's economy has been overlooked.

Respondents suggested a range of additional infrastructure and community projects to support growth, including the provision of a further hospital on the western side of Swindon near Junction 16, improvements to the highway network to accommodate future traffic growth, additional leisure and cultural facilities such as a new theatre in the Town Centre, and the delivery of parks, green spaces and community facilities to support new housing development, particularly in North Tadpole.

Several respondents sought greater clarity on elements of Chapter 7. In particular, clarification was requested regarding paragraphs 72 and 73 and the relationship between certain town centre uses and health inequalities. Respondents also highlighted the importance of safeguarding employment land but questioned whether the Plan provides sufficient opportunities for future economic growth. One respondent noted that while the proposed approach protects existing employment sites, no new major employment allocations are identified.

Wider strategic and cross-boundary economic issues were also raised. One respondent highlighted that Swindon's functional economic area extends beyond the Borough into Oxfordshire, West Berkshire and eastern Wiltshire, noting that significant employment areas associated with Swindon, such as Windmill Hill/Lydiard Fields and Blagrove, are located within Wiltshire Council's administrative area. Concerns were raised regarding the extent of joint working between Swindon Borough Council and Wiltshire Council and the implications of the Wiltshire Local Plan Review not identifying Swindon as a Principal Settlement. Respondents argued that this places additional pressure on Swindon Borough Council to accommodate economic growth and development needs within the Borough's constrained land supply. Overall, while there was strong support for the economic vision and town centre regeneration objectives set out in Chapter 7, respondents sought greater clarity on delivery, stronger links between growth and skills, additional infrastructure investment, and a more strategic approach to cross-boundary economic development.

How the main issues were taken into account:

Please note, "Chapter 7: An Economically Thriving Swindon, presented in the Reg 18 Consultation Draft, has been recoded to "Chapter 6: An Economically Thriving Swindon" in the Regulation 19 Publication Version.

We welcome the general support expressed for the Reg 18 Consultation Draft approach to creating a resilient and inclusive economy, and for the regeneration of Swindon Town Centre. We also welcome the support of the development sector for the wider Chapter 7. The Reg 19 Plan retains and strengthens the existing approach to supporting sustainable economic growth and meeting Swindon's identified employment needs, informed by a strengthened evidence base, including the 2025 Swindon Employment Needs and Lands Supply Study and 2024 Swindon Retail and Main Town Centre Uses Needs study, as well as representations received through consultation.

We understand the representations made that Swindon functions as a wider economic area extending in Oxfordshire, West Berkshire, and eastern Wiltshire, and that part of Swindon's built environment continues into the wider administrative area of Wiltshire, notably Windmill Hill, Lydiard Fields and Blagrove.. Swindon Borough Council will continue to engage with Wiltshire Council during plan preparation process, including on matters of housing and development needs. Both the 2024 Local Housing Needs Assessment and 2025 Employment Needs and Land Supply Study, major parts of our evidence base, recognise the overlap in both the Housing Market Area and Functional Economic Market Area between the two authorities, and this has informed the needs planned for in the Swindon Local Plan.

At present, neither authority is seeking to export development needs. The Reg 19 Plan reflects a commitment to positively planning to meet Swindon's identified needs within the Borough. However, we recognise that the economic and functional relationship between Swindon and the wider Wiltshire area cannot be considered solely within the Borough. Outside of the Reg 19 Plan, the emerging Thames Valley Spatial Development Strategy creates an opportunity for Swindon to work more closely with other authorities on strategic planning matters, including housing, employment, transport and infrastructure, providing a mechanism for considering matters that extent beyond the Borough boundary alongside the Council's own Local Plan responsibilities.

We acknowledge support offered for safeguarding employment sites, alongside concerns that the Reg 18 Consultation Draft did not identify sufficient new major employment sites. In advance of the Reg 19 publication, all employment sites have been reviewed, and the Reg 19 Plan identifies a number of new employment allocations through Policy E2, including Kimmerfields for approximately 20,000sqm of office floorspace, Station Quarter for approximately 44,000sqm of office and research and development floorspace, Fleet Street for approximately 10,000sqm of offices, South Marston Centre for approximately 1,000sqm of offices and Great Stall West 1 for approximately 8,000sqm of offices. Further employment capacity is identified at Hawksworth Way and Great Stall West 2 for industrial and warehousing uses, or where appropriate, a potential data centre. This reflects a more explicit approach to identifying where the employment needs highlighted in the updated evidence base can be accommodated.

Moreover, we recognise the representation in support of development of "Knowledge Central District" in the Town Centre for promoting business. In response, the Swindon Station Redevelopment has been identified as a "Knowledge Central" area, with 44,000sqm of floorspace allocated for office and research and development use. Additionally, Reg 19 Plan places greater emphasis on the recentralisation of office development, with Policy E1 directing new office floorspace toward the Town Centre in the first instance, followed by the wider Central Area and wider Urban Area along key public transport corridors. This approach supports the role of the Town Centre as a key economic location. The allocation of office and research and development floorspace at Kimmerfields and Station Quarter support this.

We acknowledge the development sector's view of the Town Centre boundary to be "largely appropriate," alongside the recommendation for a comprehensive review of existing boundaries to ensure that they remain appropriate and allow for optimal changes. The work undertaken through preparation of the Reg 19 plan has involved a review of the network and hierarchy of centres, and of the nature of identified retail and town centre boundaries, informed by the 2024 Swindon Retail and Main Town Centre Uses Needs Study. Therefore, the plan retains identified centres and boundaries, where supported by the evidence, rather than undertaking a wholesale review of all existing boundaries.

Furthermore, we recognise the specific representation that the Brunel Centre should be fully retained in an adapted form, as well as retaining its retail focus and current footprint, with non-retail uses being located on the upper floors or at roof level. The Reg 19 Plan supports the continued role of the Town Centre as the Borough's principle centre, but adopts a more flexible approach to the future use of existing floorspace, reflecting the findings of the 2024 Swindon Retail and Main Town Centre Uses Needs Study. This identifies a significant amount of vacant floorspace within Swindon Town Centre, with particularly high levels of vacancy within the Brunel Centre, and concludes that the centre needs to be repurposed to respond to changing retail patterns. This approach has been adopted in the Reg 19 Plan, which allows for consideration of an appropriate mix of uses, including a reduced retail component, where this would support the vitality and vibrancy of the centre.

We have also considered representations concerning the role of the Tented Market, including the suggestion that it provides an important function and opportunities should be explored to accommodate it within permanent vacant floorspace. The 2024 Retail and Main Town Centre Uses Needs Study recognises the former Tented Market as part of the significant vacant floorspace within the Town Centre and notes its previous role in supporting independent businesses and the vitality and vibrancy of the centre. The Study recommends bringing the Tented Market back into productive use and identifies the potential for meanwhile uses to support an active frontage and improve the town centre environment, while also recognising the importance of securing longer-term occupiers for vacant floorspace. The Reg 19 approach therefore supports the wider objective of bringing vacant town centre floorspace back into productive use and allowing the centre to diversify.

We recognise the representation from Haydon Wick Parish Council that the Orbital Shopping Park has been overlooked in the Reg 18 Consultation Draft. The Reg 19 Plan identifies the Orbital District Centre within the hierarchy of centres and provides a policy framework for its role alongside the other Urban District Centres. The Plan considers that the Orbital Shopping Centre plays an important role in meeting the day-to-day service needs of local communities as an established centre within the centres hierarchy and contributes to the vitality of the wider northern Swindon area. More generally, Policy E5 seeks to ensure that new retail, leisure and office development reflects the role, function and character of the relevant centre, while proposals for main town centre uses outside identified centres are subject to the sequential approach and, above the relevant threshold, an impact assessment. This provides a clearer framework for managing the distribution and scale of town centre uses across Swindon.

We acknowledge representations raised seeking greater provision of leisure and cultural facilities, including suggestions for a new theatre or other leisure facilities in the Town Centre, as well as additional parks, green spaces and facilities in areas such as North Tadpole to accommodate further housing. Although not every facility suggested through consultation has been identified as a specific allocation, the Reg

19 Plan supports the regeneration of the Central Area as a mixed-use cultural, commercial and leisure hub, identifying opportunities for new facilities through Policy SDA01: Swindon's Central Area.

The Central Area allocations include Regent's Place, which covers the Wyvern Theatre, where the existing uses include retail, theatre, and car parking, and Regent's Circus, which is highlighted for leisure and vacant brownfield land. Policy SDA01 further supports development proposals in the central area which contribute toward community facilities and infrastructure as identified in the Infrastructure Delivery Plan. The Reg 19 Plan therefore provides opportunities for and a framework against which additional leisure, cultural and community facilities may be delivered alongside regeneration and planned growth.

In addition, we recognise the representation that North Star College provides excellent technical training in central Swindon but lacks clear connection to the northern growth areas and suitable apprenticeship opportunities. We also recognise concerns that the skills policy in the Reg 18 Consultation Draft was underdeveloped. The Reg 19 Plan strengthens its approach to employment, skills and training through Policy E4: Employment, Skills and Training, alongside the wider economic strategy. The policy provides a clearer framework for securing local employment and skills opportunities associated with development. The updated evidence base also identifies skills shortages as an issue for employers in Swindon, with approximately 10% of employers citing skills shortages as a reason behind vacancies. The Reg 19 Plan seeks to provide a stronger basis for linking planned development with local employment, skills, and training opportunities, and supports such schemes.

We acknowledge the representation that Swindon currently has no incubators or co-working hubs, and the concern that this could result in missed opportunities associated with green technology and digital industries. While the Reg 19 Plan does not identify a specific allocation solely for an incubator or co-working hub, it identifies and places strong emphasis on knowledge-based industries, creative and professional services, advanced manufacturing, defence, low-carbon technologies and life sciences as priority sectors and provides for additional employment floorspace to support economic growth.

We acknowledge the representations that residents across Swindon should be able to access opportunities and services close to home through active travel, helping to reduce carbon emissions. We also recognise the concern that some proposed allocations are separated from existing urban areas and could therefore be unsustainable or increase dependency on private vehicles.

In response, the Reg 19 Plan continues to connect the location of development with accessibility and sustainable transport through the spatial strategy and transport policies in Chapter 7: Well-Connected, Sustainable Transport. In particular, Policy ST1: Spatial Vision: A Well-Connected Swindon establishes the overarching approach to connectivity, while Policy ST2: Promoting Sustainable Transport outlines

approaches to supporting sustainable and active travel. This is supported by Policy ST3: Accessibility and Development, which requires development to be accessible by sustainable transport, alongside Policies ST5 and ST6 which address the public transport provision and highway infrastructure needed to support planned growth. The Reg 19 Plan therefore retains the principle that new development should be located and designed to support sustainable access to employment, services, and facilities, with detailed transport requirements for individual allocation addressed through these policies.

We recognise concerns raised regarding the relationship between development, infrastructure and health and wellbeing, including the request for greater clarity in relation to connection between town centre uses and health inequalities. Furthermore, we recognise the suggestion that an additional hospital could be provided on the other side of Swindon, with potential around Junction 16 of the M4 to address capacity at Great Western Hospital. In the Reg 19 Plan, a new hospital in this location has not been allocated, however these concerns have been communicated to the relevant health authorities.

The Reg 19 Plan has strengthened the treatment of health and wellbeing by addressing these matters within Chapter 9: A Healthy and Social Swindon, which includes policies HL1: Health Impact Assessment and HL2: Concentration of Uses. Policy HL1 establishes a framework for consideration of the effects of development on health and health inequalities, particularly access to healthcare services and other social infrastructure, accessibility and active travel, access to employment and environmental hazards.

Policy HL2 responds to concerns regards concentration of uses which may have adverse effects on public health, including betting shops and fast-food outlets. With regard to the provision and capacity of infrastructure, Policy INF1: Infrastructure and Developer Contributions establishes that appropriate infrastructure and services must be available in the right places at the right time to support new and existing communities. The supporting text signposts healthcare and transport both as necessary infrastructure and confirms that the Infrastructure Delivery Plan has assessed infrastructure capacity within the Borough, in consultation with key service providers and operators, identifying essential projects required to support growth. The provides the framework for infrastructure requirements arising from planned development, including new or improved healthcare infrastructure.

Finally, we understand questions regarding the ability of the road network to accommodate additional traffic arising from such planned growth. In response, the Reg 19 Plan has strengthened Policy ST6: Highway Improvements, informed by the Transport Impact Assessment and associated modelling undertaken to support development across the Borough.

This assessment has modelled the growth scenarios and sites in the Plan and identified highway measures required to facilitate development and relieve existing

pressures at key locations, including along the M4 and A419. The policy identifies a series of improvements, including the Wichelstowe Southern Access Road/M4 Junction 16, New Eastern Villages A420 Eastern Access, William Morris Way/Tadpole Link Road and Cricklade Road junction capacity improvements. In addition, Policy ST8: Transport Assessments, Transport Statements and Travel Plans requires development proposals to provide appropriate mitigating measures to offset adverse impacts on the transport network, and requires Transport Assessment where development is likely to create significant transport movements and environmental impacts.

Chapter 8: A Well-Connected, Active Swindon

SP5: Better-Connected, Active Neighbourhoods

Summary of main issues raised:

Respondents generally supported the Local Plan's approach to delivering a resilient and inclusive economy, regenerating Swindon Town Centre and improving access to jobs, services and opportunities. A respondent representing the development sector was broadly supportive of Chapter 7 and, in particular, welcomed the recognition that town centres should no longer rely solely on traditional retail uses. Support was expressed for increasing the mix of uses within the Town Centre, including residential development, bringing vacant floorspace back into productive use and encouraging a wider range of commercial, cultural and community activities.

A recurring theme was the future role of Swindon Town Centre. Respondents supported the continued importance of the Brunel Centre as the principal focus for shopping and activity, whilst recognising the need for adaptation to changing retail trends. Suggestions included retaining the Centre largely within its existing footprint, directing non-retail uses towards upper floors and roof-level accommodation, and making better use of vacant floorspace. Whilst respondents acknowledged the historic contribution of the Tented Market, some considered that similar activities could be accommodated within existing vacant premises. There was also strong support for the creation of a "Knowledge Central" district within the Town Centre to strengthen Swindon's business, innovation and knowledge-based economy.

Several respondents highlighted the importance of sustainable access to economic opportunities. Respondents supported the ambition for residents across the Borough to access employment, services and facilities closer to home through active travel and sustainable transport, helping to reduce carbon emissions. However, a respondent representing the development sector raised concerns that some allocations proposed under Policy SP4 are physically separated from existing urban areas and may not represent sustainable locations, potentially increasing reliance on private vehicle travel.

Skills, business development and economic diversification were identified as areas requiring further attention. Haydon Wick Parish Council acknowledged the contribution made by North Star College in providing technical training within central Swindon but considered that stronger links are needed between educational provision, northern growth areas and apprenticeship opportunities. The Parish Council also considered the skills agenda within the Plan to be underdeveloped and expressed concern that insufficient provision is made for business incubators, start-up space and co-working hubs that could support the growth of green technology,

digital and innovation-led industries. In addition, Haydon Wick Parish Council considered that the economic role of Orbital Shopping Park in North Swindon is not adequately recognised within the chapter.

Respondents also identified a range of infrastructure and community facilities which they considered necessary to support economic and population growth. Suggestions included the provision of an additional hospital serving the western side of Swindon near Junction 16 of the M4, improvements to the Borough's road network to accommodate future traffic growth, a new theatre and additional leisure facilities within the Town Centre, and the delivery of parks, green spaces and community facilities in growth areas such as North Tadpole.

Several respondents sought clarification on aspects of the chapter's wording and evidence base. Clarification was requested regarding the meaning of paragraphs 72 and 73 and, specifically, the relationship between town centre uses and health inequalities. Respondents sought greater explanation of how certain uses contribute to health outcomes and how these matters would be addressed through planning policy.

Broader strategic and cross-boundary economic issues were also raised. One respondent highlighted that Swindon's functional economic area extends beyond the Borough boundary into Oxfordshire, West Berkshire and eastern Wiltshire, and noted that significant employment locations associated with Swindon's economy, including Windmill Hill/Lydiard Fields and Blagrove, lie within the administrative area of Wiltshire Council. Concerns were expressed that there has been limited joint working between Swindon Borough Council and Wiltshire Council in planning for future housing and economic growth, and that the Wiltshire Local Plan Review does not identify Swindon as a Principal Settlement. Respondents argued that this restricts opportunities to accommodate Swindon-related economic growth within neighbouring areas and increases pressure on Swindon Borough Council to meet these needs within the Borough's constrained land supply.

Whilst respondents generally supported the Plan's approach to safeguarding existing employment sites and strengthening the Town Centre economy, concerns were raised that no major new employment allocations are proposed. Respondents considered that additional opportunities for strategic employment growth may be required alongside housing growth to support the delivery of the Plan's wider economic ambitions. Overall, respondents were broadly supportive of the chapter's economic vision but sought stronger links between growth, skills and infrastructure provision, greater clarity in certain policy areas, and a more coordinated approach to strategic economic planning across administrative boundaries.

How the main issues were taken into account:

Please note, “Policy SP5: Better-Connected, Active Neighbourhood” presented in the Reg 18 Consultation Draft, has been deleted. This was to avoid duplication and to improve the clarity of the plan.

The Council recognises the suggestion to include a wider strategic vision for electric vehicles and public transport, including increased service frequencies, extended operating hours and additional rural routes. The Chapter has been reviewed to ensure that it supports the delivery of the Council’s wider public transport objectives through relevant policies.

The policy ST5: Parking and Electric Vehicles requires all development to provide electric vehicle charging infrastructure in accordance with the relevant Building Regulations. This ensures that development provides the required charging infrastructure in line with national standards and supports the transition towards electric vehicles. The policy also requires parking and development proposals to appropriately incorporate electric vehicle charging provision where parking is provided.

The policy ST2: Improving Public Transport gives priority to the implementation of the major proposals identified in the Bus Improvement Plan, including new bus lane infrastructure, bus gates, traffic signal prioritisation, enhanced network coverage and Demand Responsive Transport (DRT). It also supports the provision of Mobility Hubs, Park and Ride infrastructure and strategic interchange facilities, where demand is justified, to improve connectivity and encourage greater use of sustainable modes of travel. These measures provide a framework for improving public transport accessibility and reducing reliance on private cars, including through improved connections between the urban area and key locations.

The policy also supports improved integration between bus and rail services and requires development in the central area to maximise access to Swindon Railway Station and any future rail stations. The Council will continue to work with GWR, Network Rail and other relevant partners to support improvements to public transport connectivity and interchange. Matters relating to service frequencies, operating hours and the introduction or extension of specific routes will continue to be considered through the relevant transport strategies, service planning and partnership arrangements.

The Council recognises the concerns raised regarding Swindon’s existing urban form, dispersed land uses and historic development patterns contributing to car dependency and creating challenges for increasing public transport use. The Local Plan seeks to address these challenges through the identification and promotion of sustainable transport corridors, which are intended to improve connections between new development, the Town Centre and other key local centres.

In addition, Policy ST1: Spatial Vision – A Well-Connected Swindon promotes a shift towards more sustainable modes of travel and modal shift, while Policy ST2: Promoting Sustainable Transport requires development proposals to demonstrate how the transport hierarchy has been applied. Together, these policies seek to reduce reliance on private cars, improve connectivity and support more sustainable travel patterns, helping to address the existing barriers to increased public transport use identified by respondents.

ST1: Promoting Sustainable Transport

Summary of main issues raised:

Respondents generally supported the policy's objectives of promoting sustainable travel, reducing reliance on private cars and supporting the provision of appropriate parking and electric vehicle infrastructure. In particular, respondents from the development sector welcomed the policy's emphasis on sustainable transport and its role in encouraging more sustainable travel choices.

A number of respondents sought to strengthen the policy's requirements and improve its effectiveness. Swindon Borough Council's Transport Development Management Team emphasised that the specifications referred to in Point 1 should be mandatory policy requirements rather than aspirations, in order to provide greater certainty and support robust decision-making.

Oxfordshire County Council supported the overall direction of the policy but recommended the inclusion of clear modal shift and traffic reduction targets aligned with the Local Transport Plan. The Council considered that measurable targets would provide a clearer framework for monitoring outcomes and managing the cumulative transport impacts of development.

Swindon Cycle Campaign similarly supported the policy's objectives but suggested that it should be strengthened through more detailed policy requirements and guidance to better support walking, cycling and wider sustainable transport outcomes.

Overall, while respondents were generally supportive of the policy's aims, comments focused on the need for stronger and more measurable requirements to ensure that sustainable travel objectives are effectively delivered through new development.

How the main issues were taken into account:

Please note “Policy ST1: Promoting Sustainable Transport” presented in the Reg 18 Consultation Draft, has been renamed to “Policy ST1 Spatial Vision: A Well-Connected Swindon” in the Regulation 19 Publication Version.

The Council recognises the suggestions to provide clearer modal-shift and traffic reduction targets and to strengthen the policy. The Council has considered these representations through the preparation of the transport evidence base and Strategic Transport Model, including testing a practical modal split target as part of the Local Plan scenario testing.

The findings have informed the approach to sustainable transport, including the transport hierarchy, sustainable transport corridors and measures to support modal shift. The policy has therefore been strengthened to provide a clear framework for reducing reliance on private vehicles and supporting sustainable travel, while allowing detailed measures to be developed through the relevant transport strategies and implementation programmes.

ST2: Improving Public Transport

Summary of main issues raised:

South Oxfordshire District Council and Vale of White Horse District Council welcomed the policy and expressed an interest in continuing engagement on the potential delivery of mobility hubs and park-and-ride facilities along the A419 corridor. National Highways also supported the proposed mobility hub at Junction 16, emphasising that its delivery should be considered alongside the findings and implications of the transport evidence base.

Whilst supporting the policy's overall direction, Swindon Cycle Campaign recommended that it should be strengthened through more detailed policy requirements to better support the delivery of cycling infrastructure and wider sustainable transport objectives. Overall, respondents were supportive of the policy and the role that mobility hubs could play in promoting sustainable travel, improving connectivity and reducing reliance on private car journeys.

How the main issues were taken into account:

Please note, "Policy ST2: Improving Public Transport presented in the Reg 18 Consultation Draft, has been recoded to "Policy ST5: Improving Public Transport" in the Regulation 19 Publication Version.

We recognise that stronger approach needs to be considered to promote and improve public transport. The policy now identifies key public transport infrastructure improvements to support growth including the proposed transit corridors and new interchange and active travel facilities around the railway station supported by GWR. The policy requires development in central area to work collaboratively with all public transport stakeholders to improve connectivity within central area.

ST3: Freight and Logistics

Summary of main issues raised:

Oxfordshire County Council welcomed the policy and expressed an interest in collaborative working, including shared learning and joint initiatives. The Council emphasised the importance of stronger cross-boundary coordination in implementing the policy, particularly through early engagement with neighbouring authorities to manage the impacts of construction activity and freight movements effectively.

Concerns were also raised regarding the transport impacts of existing and proposed employment development. In particular, one respondent highlighted the need for the Plan to consider and address the implications of warehousing development at Panattoni Park, noting the potential for increased heavy goods vehicle movements and associated impacts on the transport network. Overall, respondents supported the policy's objectives but sought greater consideration of cross-boundary freight and logistics issues and their cumulative impacts.

How the main issues were taken into account:

Please note, "Policy ST3: Freight and Logistics" presented in the Reg 18 Consultation Draft, has been recoded to "Policy ST7: Freight and Logistics" in the Regulation 19 Publication Version.

We recognised that Panattoni Park development will create additional lorry traffic. As part of strategic transport modelling, we have considered the potential impact of the Panattoni Park on the strategic road network as suggested by national Highways and the potential outcomes in Transport Impact Assessment will be informed through all major committed development and their impact on strategic road network within borough.

ST4: Transport Assessments, Transport Statements and Travel Plans

Summary of main issues raised:

Respondents generally supported the policy's objectives but sought a number of amendments to strengthen its effectiveness, implementation and alignment with national guidance. Swindon Cycle Campaign supported the policy's direction but recommended the inclusion of more detailed policy requirements to strengthen the delivery of sustainable transport outcomes.

Swindon Borough Council's Transport Development Management Team suggested a number of amendments to improve the policy's clarity and flexibility. These included correcting terminology, removing requirements considered overly prescriptive and deleting provisions which were not considered relevant to new development proposals.

Oxfordshire County Council emphasised the importance of securing Travel Plans at an early stage in the development process, ideally at planning permission stage and before developments are occupied. The Council considered that the policy should place stronger emphasis on the preparation, securing, monitoring and enforcement of Travel Plans, including the use of mechanisms such as implementation triggers and financial bonds, to ensure that Travel Plans deliver measurable transport outcomes rather than simply satisfying procedural requirements.

Respondents from the development sector raised concerns regarding the proportionality of some of the policy requirements. One respondent argued that Criterion 4 should be aligned more closely with Department for Transport guidance and that developments generating only minor transport impacts should be supported by a Transport Statement rather than a full Transport Assessment. Another respondent considered that the policy applies stricter mitigation requirements than national planning policy and suggested that it should be amended to better align with the NPPF's thresholds and tests for assessing transport impacts.

Overall, respondents were supportive of the policy's aims but sought greater clarity, flexibility and alignment with national guidance, alongside stronger mechanisms to ensure that Travel Plans and associated transport mitigation measures are effectively implemented and monitored

How the main issues were taken into account:

Please note, "Policy ST4: Transport Assessments, Transport Statements and Travel Plans" presented in the Reg 18 Consultation Draft, has been recoded to "Policy ST8: Transport Assessments, Transport Statements and Travel Plans" in the Regulation 19 Publication Version.

The Council recognises the concern raised regarding the thresholds for Transport Statements and Transport Assessments. Criterion (4) has been amended to reference relevant Department for Transport guidance and the Council's Travel Plan Supplementary Planning Document (SPD), which provide further detail on the thresholds and circumstances for requiring a Transport Statement or Transport Assessment.

The Council recognises the concern regarding the mitigation requirements set out in the policy. The policy has been reviewed and amended where appropriate and is considered to align with the approach and requirements of the NPPF 2024 in relation to transport impacts and mitigation.

ST5: Parking and Electric Vehicle Infrastructure

Summary of main issues raised:

Respondents expressed a range of views on the policy, with comments focusing on its clarity, proportionality and effectiveness in supporting sustainable travel. Swindon Cycle Campaign supported the policy's overall objectives but recommended that it should be strengthened through more detailed policy requirements to better support cycling and sustainable transport outcomes.

Swindon Borough Council's Transport Development Management Team raised concerns regarding the clarity and consistency of Policy ST5, noting potential conflicts with the Council's adopted Parking Standards. The Team suggested that the policy be simplified, or alternatively amended to include a direct requirement for development to comply with the adopted Parking Standards in order to avoid duplication and confusion.

Respondents from the development sector similarly questioned the relationship between the policy and existing guidance. Concerns were raised that some requirements relating to electric vehicle charging infrastructure may duplicate Building Regulations requirements, while others suggested that the policy does not fully align with the relevant Technical Guidance on Parking. Several respondents also considered the policy to be overly prescriptive, particularly for smaller developments, and sought a more flexible and proportionate approach.

Oxfordshire County Council supported a stronger emphasis on accessibility-led parking restraint, recommending that the policy should more actively promote reduced car dependence through effective parking management measures and improved cycling provision. Similarly, one respondent noted that the success of car-free and low-car development depends upon the alignment of the spatial strategy, employment locations and high-quality sustainable transport infrastructure.

Respondents also highlighted practical challenges relating to active travel. One respondent argued that the current lack of a comprehensive cycle network could limit the effectiveness and use of cycle parking provision. Overall, while respondents generally supported the policy's sustainable transport objectives, they sought clearer alignment with existing standards and guidance, greater flexibility in implementation, and stronger measures to support cycling and reduce reliance on private vehicle

How the main issues were taken into account:

Please note, "Policy ST5: Parking and Electric Vehicle Infrastructure" presented in the Reg 18 Consultation Draft, has been renamed and recoded to "Policy ST9: Parking and EVs" in the Regulation 19 Publication Version.

The supporting text outlines the requirements of Part S (Infrastructure for electric charging vehicles) of the Building Regulations, and the policy acknowledges that the relevant developments must align with these requirements. Policy wording has been changed to state 'all developments must comply with the standards set out in Swindon's Parking Standards for New Developments (2021)'. The supporting text refers to this guidance, aiming to provide further clarity and consistency. Accessibility-led parking restraint will be addressed through parking design and management plans and ensuring that suitable parking spaces are provided within car free development.

The policy has also been strengthened to improve secure and accessible cycle parking provision. The spatial strategy and employment provision support sustainable transport objectives by directing development towards the most sustainable locations. Development proposals within sustainable development areas will be expected to demonstrate how they support and connect to public transport networks and maximise key transit corridors. The plan aims to expand cycle networks, particularly with developments in sustainable development areas exploring opportunities to connect to the National Cycle Network. The plan supports the delivery of cycle lanes, contraflow cycle lanes and cycle hubs to make cycling more viable. The policy has been reviewed to ensure requirements are applied proportionately. The supporting text refers to the Council's car and cycle parking guidance, which provides further detail on the requirements different scales and types of development.

Other general comments relating to Chapter 8

Summary of main issues:

Respondents generally supported the policy's objectives but sought greater clarity, stronger delivery mechanisms and a more ambitious approach to sustainable transport. Several respondents suggested amendments to the policy wording and supporting text to improve understanding and avoid ambiguity. In particular, one respondent argued that the term "sustainability" is insufficiently defined and should be replaced with more precise terminology. The same respondent also sought further explanation of the policy's "vision-led approach", recommending that it be framed around a clearer "decide-and-provide" approach to transport planning.

A number of respondents raised concerns regarding the policy's evidence base and deliverability. One respondent noted that the existing Local Cycling and Walking Infrastructure Plan (LCWIP) does not include a number of important active travel schemes required to support the policy's objectives and therefore recommended that the LCWIP be updated to align with the proposed transport strategy. Other respondents highlighted practical transport issues that they felt should be addressed

more explicitly, including inadequate parking provision, car-dominated environments, blocked pavements and deficiencies in existing active travel networks.

National Highways highlighted the potential implications that proposed rail freight and logistics infrastructure to the east and west of Swindon could have for the Strategic Road Network. It requested ongoing collaboration to understand and manage any impacts on the M4 and A419, and emphasised the importance of safeguarding land and opportunities to support long-term rail freight aspirations.

Respondents also sought greater clarity on strategic transport infrastructure delivery. Concerns were raised that the policy does not set out a clear programme for upgrading key transport infrastructure, including Turnpike Junction and proposed additional railway stations. Some respondents considered that the policy should provide a clearer delivery framework for these projects to demonstrate how strategic transport improvements will support future growth.

Finally, some respondents questioned whether the policy is sufficiently ambitious in reducing reliance on motorised transport. Whilst supporting the overall direction of travel, they considered that stronger measures and clearer targets may be required to deliver a meaningful shift towards walking, cycling and public transport and achieve the Plan's wider sustainability objectives.

How the main issues were taken into account:

Please note, "Chapter 8: A Well-Connected, Active Swindon presented in the Reg 18 Consultation Draft, has been renamed and recoded to "Chapter 7: Well-connected, Sustainable Transport" in the Regulation 19 Publication Version.

The council recognised that the policy requires stronger approach to minimise dependence on personalized transport mode and support the delivery of sustainable transport modes.

The Council recognises the concerns raised regarding the delivery and upgrading of key transport infrastructure, including Turnpike Junction and additional railway stations. As part of the preparation of the Strategic Transport Model, the Council has worked with its transport consultants and National Highways to consider the potential impacts of planned and committed transport infrastructure, as well as the impact of new development and associated changes in travel demand on the Strategic Road Network, including the M4 and A419. The modelling will help inform the identification and delivery of appropriate transport infrastructure to support planned growth and mitigate its impacts on the wider network.

The outputs are provided in the Transport Impact Assessment and the Infrastructure Delivery Plan which will be reviewed with National Highways and neighbouring authorities to as part of a vision led approach for Transport for the borough.

Chapter 9: An Environmentally Sustainable Swindon

SP6: Climate Stability and the Environment

Summary of main issues raised:

Respondents expressed a range of views on the policy, with many supporting its overall sustainability objectives whilst seeking stronger and more comprehensive measures to address climate change, biodiversity and resource efficiency. Some respondents considered that the policy does not sufficiently reflect the scale of the climate emergency or the challenges associated with achieving net zero carbon emissions. Respondents called for stronger commitments to decarbonisation, including greater support for renewable and low-carbon energy generation, local energy schemes, the decentralisation of energy systems, and the phase-out of gas connections in new development. Several respondents also suggested that the policy should place greater emphasis on climate adaptation and resilience alongside emissions reduction.

Biodiversity and the natural environment were recurring themes within responses. Several respondents raised concerns that the policy does not adequately address Biodiversity Net Gain (BNG) requirements or recognise opportunities for development sites to contribute towards biodiversity enhancement. Natural England recommended strengthening the policy through the inclusion of nature-based solutions such as green roofs, green walls, tree planting and Sustainable Drainage Systems (SuDS). Natural England also emphasised the importance of incorporating climate adaptation and environmental enhancements at the earliest stages of the design process and suggested that the policy should provide stronger support for water-sensitive design, renewable and low-carbon energy generation and biodiversity enhancement. In addition, Natural England raised concerns that the policy does not adequately address the effects of climate change on protected sites, species and habitats, nor sufficiently consider the impacts of air quality and development-related traffic on the natural environment.

Several respondents, including Oxfordshire County Council, supported the policy's alignment with wider sustainability and net zero objectives but suggested that it should be strengthened through more detailed policy requirements and guidance. Respondents commonly argued that the current wording lacks sufficient certainty, with some stating that phrases such as "where viable" and "seek to" weaken the policy and leave it vulnerable to viability-based challenges. As a result, respondents called for stronger and more definitive requirements to ensure that the policy delivers meaningful environmental outcomes.

Resource efficiency and sustainable development were also important themes. One respondent highlighted the need for the policy to give greater consideration to the waste hierarchy, while others suggested that sustainability measures should be broadened to include local renewable energy production and wider decarbonisation opportunities. South-West Housing Association Planning Consortium supported the objective of promoting sustainable development but emphasised the need to carefully consider the cumulative impact of climate-related policy requirements on the delivery of affordable housing. The Consortium, alongside several respondents from the development sector, cautioned against duplicating requirements already addressed through Building Regulations and the Future Homes Standard, arguing that policies should provide certainty and consistency while remaining deliverable and viable.

Development sector respondents generally supported the policy's objectives but sought greater flexibility in its implementation. One respondent welcomed the policy and considered it to be consistent with national policy and guidance. However, others argued that some requirements, including the preference for electricity as the primary source of heating and energy use, are overly prescriptive and may restrict innovative, balanced or site-specific sustainability solutions. Respondents also stressed the importance of ensuring that policy requirements remain viable and deliverable in practice and that sufficient flexibility is retained to respond to differing site circumstances whilst still achieving sustainability objectives.

Overall, respondents broadly supported the policy's sustainability ambitions but sought stronger measures relating to climate change mitigation and adaptation, biodiversity enhancement, renewable energy generation and net zero delivery, alongside clearer wording, greater certainty and a balanced approach to viability and implementation.

How the main issues were taken into account:

Please note, “Policy SP6: Climate Stability and the Environment” presented in the Reg 18 Consultation Draft, has been deleted and replaced with several policies within “Chapter 8: An Environmentally Sustainable Swindon” in the Regulation 19 Publication Version. This was to avoid duplication and to improve the clarity of the plan.

The waste hierarchy is not addressed within policy as it is established within the Swindon Waste Strategy 2019 – 2029. This strategy requires that all waste reduction actions are undertaken in accordance with the waste hierarchy. The Regulation 19 Plan includes the addition of Policy CSE1: Mitigation and Adaptation to Climate Change. This policy requires new development to consider all relevant climate risks and incorporate adaptation and mitigation measures into design.

The content on net zero and decarbonisation has been expanded through Policies CSE2, CSE3 and INF4, which all align with the corporate publication Decarbonisation Framework (2025). Furthermore, the addition of the new Policy CSE5: Renewable Energy supports proposals for renewable energy generation, contributing to wider decarbonisation objectives.

The influence of the climate policies on affordable housing has been viability tested and do not impact the priorities for affordable housing delivery within the borough. Policy wording aligns with the assessment and national standards. Biodiversity net gain (BNG) is addressed within Policy CSE11: Biodiversity, Geodiversity and Nature Recovery, which sets out how planning applications will be used to achieve the statutory BNG requirement on applicable sites. Policy CSE2: Carbon Reduction and Sustainable Design refer to Building Regulations as the primary framework for setting energy efficiency requirements, and states how the intention of the policy is not to duplicate any energy efficiency requirements. Phrases such as 'where viable' and 'seek to' have been removed to strengthen policy recommendations.

Policy INF4: Energy Networks and Policy CSE2: Carbon Reduction and Sustainable Design strengthen policy measures on decentralised energy networks and prioritise low carbon heating solutions such as district heating. Blue infrastructure has been incorporated into Policy CSE7: The Green and Blue Infrastructure Network, with relevant planning and design guidance referenced to support the provision of green and blue spaces within new development.

CSE1: Carbon Reduction and Sustainable Design in New Developments

Summary of main issues:

Respondents generally supported the policy's objectives but raised a range of concerns regarding its scope, effectiveness, evidence base and deliverability. A number of respondents considered that the policy should provide stronger guidance on sustainable construction measures, including the use of low-carbon building materials, on-site solar energy generation, rainwater collection systems, nature-based solutions and opportunities for domestic renewable energy generation. Several respondents also argued that the policy should place greater emphasis on achieving the Council's net zero ambitions through clearer and more ambitious requirements relating to energy efficiency, carbon reduction and climate adaptation.

Respondents raised concerns regarding the strength and clarity of the policy wording. Some considered the policy to be overly aspirational and insufficiently effective as a development management tool, arguing that it extends beyond national targets, adopted standards and Building Regulations without providing clear implementation mechanisms. Respondents sought stronger and more measurable requirements, including the adoption of a fabric-first approach, operational energy and Energy Use Intensity targets, overheating mitigation measures, sustainable

construction standards, stronger renewable energy requirements, heat reuse measures and the phased removal of gas connections. Some respondents also suggested removing qualifying language to provide greater certainty over the delivery of policy objectives.

A significant theme within responses related to the relationship between the policy and national standards. Respondents from the development sector generally supported the overall objectives of the policy but argued that local requirements should align with national guidance, Building Regulations and the Future Homes Standard unless supported by a robust, costed evidence base. Several respondents questioned whether requirements relating to operational and embodied carbon, BREEAM standards and other sustainability measures had been adequately justified or viability tested. Concerns were also raised regarding the potential impact of these requirements on development viability and affordable housing delivery, with respondents calling for greater transparency regarding how policy requirements had been derived, assessed and tested.

Specific comments were also made regarding the operation and implementation of the policy. Some respondents considered that the policy lacks sufficient clarity regarding the standards expected if the Future Homes Standard is not implemented in the form anticipated and suggested that clearer metrics should be provided. Concerns were similarly raised regarding the application of BREEAM Excellent standards, with respondents seeking greater clarity on how compliance would be assessed through the planning process and what evidence would be required to demonstrate that standards had been achieved.

Development sector respondents also highlighted the need for greater flexibility to accommodate site-specific circumstances and innovation. Concerns were raised that certain elements of the policy, including the emphasis on electricity as the primary source of heating and energy use, could be overly prescriptive and prevent alternative sustainable solutions from being brought forward. One respondent suggested that the policy should be merged with Policy SP6 and place greater emphasis on site-specific sustainability assessments to identify the most appropriate measures for individual developments.

Finally, respondents highlighted the need for stronger guidance on climate adaptation, with some noting that the policy currently provides insufficient direction on appropriate adaptation measures. Overall, whilst respondents broadly supported the policy's sustainability objectives, they sought stronger guidance on net zero delivery, renewable energy, sustainable construction and climate adaptation, together with clearer requirements, greater transparency regarding the evidence

base and viability testing, and improved flexibility to respond to site-specific circumstances.

How the main issues were taken into account:

Please note, “Policy CSE1: Carbon Reduction and Sustainable Design in new development” presented in the Reg 18 Consultation Draft, has been renamed and recoded to “Policy CSE2: Carbon Reduction and Sustainable Design” in the Regulation 19 Publication Version.

This policy now refers to local, low carbon and sustainability sources materials and on-site renewable energy generation, expecting developments to maximise their use. Rain collection and nature-based solutions are covered within Policy CSE12: Managing Flood Risk under sustainable drainage systems. The addition of the energy efficiency heading helps to support progress towards the UK’s net zero target. This section introduces stronger wording, such as “all developments are required to demonstrate the hierarchical approach to reducing energy demand” which includes reducing energy demand through fabric performance first.

Energy use intensity targets and other measurable requirements have not been established because it has been determined setting targets beyond the requirements of Building Regulations would not be viable or robustly justified. We have considered viability of affordable housing against different climate responsive policies. Based on viability testing of all sites against Part L 2021 Regulations, FHS and Net Zero plus, our current policy wording aligns with the assessment and national standards. This policy ensures that requirements do not extend beyond government targets, nationally adopted standards and Building Regulations. Developments are required to align with the UK Net Zero Carbon Buildings Standard and BREEAM Communities standards. The previous requirement to achieve a BREEAM Excellent rating has been removed. Sustainability Statements and clear adaptation measures are addressed within Policy CSE1: Mitigation and Adaptation to Climate Change.

CSE2: Whole Life Carbon Assessments (WLCA)

Summary of main issues:

Respondents expressed a range of views on the policy, with many supporting its overall sustainability objectives while seeking stronger measures to address climate change, biodiversity and resource efficiency. Several respondents considered that the policy does not sufficiently reflect the scale of the climate emergency or provide a clear pathway to achieving net zero carbon emissions. Comments highlighted the need for stronger commitments to decarbonisation, including support for renewable and low-carbon energy generation, local and decentralised energy schemes, the phased removal of gas connections, and clearer requirements relating to energy efficiency, operational energy use and climate adaptation.

Natural England recommended strengthening the policy's approach to biodiversity and climate resilience through the inclusion of nature-based solutions such as green roofs, green walls, tree planting and Sustainable Drainage Systems (SuDS). Natural England also emphasised the importance of incorporating climate adaptation, biodiversity enhancement and water-sensitive design from the earliest stages of the design process, and sought stronger consideration of the impacts of development on protected sites, habitats, species, air quality and the wider natural environment. Respondents more generally considered that the policy should provide greater recognition of Biodiversity Net Gain opportunities and biodiversity enhancement measures.

Oxfordshire County Council supported the policy's alignment with sustainability and net zero objectives but advocated stronger and more detailed policy requirements to support implementation. Similarly, several respondents considered that wording such as "seek to" and "where viable" weakens the policy and called for clearer, more ambitious and measurable requirements relating to carbon reduction, operational energy performance, overheating mitigation, sustainable construction standards and renewable energy provision.

Resource efficiency and deliverability were also key themes. Respondents highlighted the need for greater recognition of the waste hierarchy, stronger support for local renewable energy generation and clearer guidance on climate adaptation measures. South-West Housing Association Planning Consortium supported the promotion of sustainable development but emphasised the importance of considering the cumulative effects of climate-related requirements on affordable housing delivery. The Consortium, alongside several respondents from the development sector, cautioned against duplicating Building Regulations and Future Homes Standard requirements and stressed the importance of ensuring that policy requirements are supported by robust evidence and remain viable and deliverable in practice.

Whilst respondents from the development sector generally supported the policy's objectives, they raised concerns that some requirements exceed national standards, lack a sufficiently robust evidence base or have not been adequately viability tested, particularly in relation to operational and embodied carbon targets and BREEAM requirements. Respondents sought greater transparency regarding how requirements had been derived, clearer guidance on the implementation and assessment of BREEAM standards, greater certainty should Future Homes Standards differ from current expectations, and sufficient flexibility to accommodate site-specific sustainability solutions. Some respondents also suggested that the

policy should be merged with Policy SP6 and place greater emphasis on site-specific sustainability assessments.

Overall, respondents broadly supported the policy's sustainability ambitions but sought stronger and clearer policy requirements relating to climate change mitigation and adaptation, biodiversity enhancement, renewable energy generation and net zero delivery, alongside greater certainty regarding implementation, evidence, viability and compliance with national standards.

How the main issues were taken into account:

Please note, "Policy CSE2: Whole Life Carbon Assessments (WCLA)" presented in the Reg 18 Consultation Draft, has been recoded to "Policy CSE3: Whole Life Carbon Assessments (WCLA)" presented in the Regulation 19 Publication Version.

This policy requires alignment with the RICS Whole Life Carbon Assessment for the Built Environment Professional Standard. The supporting text has been revised to refer applicants to the methodology and templates for undertaking and submitting WLCA alongside their proposals. The supporting text also addresses concerns regarding the applicability of WCLA at the outline stage, full lifecycle analysis and the modular structure of the assessment. It recognises that the level and detail of information available will vary depending on the stage and circumstances of development and that assessment requirements should therefore be proportionate to the information reasonably available at each stage.

The policy does not specifically reference the Future Homes Standards as this requirement covers a different scope from the purpose of WCLA. This policy has also now been cross referenced within Policy CSE2 to avoid overlap with other sustainability standards. We have considered viability of affordable housing against different climate responsive policies. Based on viability testing of all sites against Part L 2021 Regulations, FHS and Net Zero plus, our current policy wording aligns with the assessment and national standards.

CSE3: Green infrastructure in New Developments

Summary of main issues raised:

Respondents raised a number of concerns regarding the implementation, justification and scope of the policy's urban greening requirements. A recurring theme was the relationship between the proposed Urban Greening Factor (UGF), Biodiversity Net Gain (BNG) requirements and Building with Nature Standards, with several respondents commenting that these measures overlap and could create confusion. Respondents also questioned whether the Urban Greening Factor and Building with Nature Standards are supported by a sufficiently robust evidence base, with some arguing that the requirements require further justification.

Deliverability and viability were also key issues raised. Several respondents expressed concerns about the practicality of implementing Urban Greening Factor requirements on brownfield sites, where site constraints may limit opportunities for greening interventions. Respondents further highlighted the potential costs associated with delivering and maintaining Urban Greening Factor measures over the long term and questioned whether these implications had been adequately considered.

Respondents generally supported the principle of enhancing green infrastructure but sought a stronger emphasis on its role in addressing climate change. Comments highlighted the need to ensure that green infrastructure is climate resilient and that the policy more clearly recognises the benefits that green infrastructure can provide in mitigating and adapting to climate change. Some respondents also called for additional requirements relating to Sustainable Drainage Systems (SuDS), including the incorporation of trees and vegetation, and greater integration between green infrastructure and SuDS design.

Several respondents questioned the scope and application of the policy, including whether the requirements apply only to major development proposals. Concerns were also raised that the policy focuses heavily on green infrastructure but makes little or no reference to blue infrastructure, with respondents suggesting that water features, watercourses and other blue infrastructure assets should be recognised more explicitly. Overall, while respondents generally supported the objectives of urban greening and green infrastructure provision, they sought greater clarity regarding the relationship between different environmental requirements, stronger evidence to justify the proposed standards, and greater consideration of deliverability, maintenance and integration with wider green and blue infrastructure networks.

How the main issues were taken into account:

Both 'Building with Nature requirements' and UGF in policy CSE3 are discretionary requirements that applicants are strongly advised to use. These guidance standards are unlikely to cause confusion with mandatory BNG requirements.

The plan now makes reference to blue infrastructure in addition to green infrastructure. SuDS are now referenced as acceptable GI assets.

CSE4: The Green Infrastructure Network

Summary of issues raised:

Respondents raised concerns regarding the potential implications of the Open Space (OS) and Green Infrastructure (GI) designations for future development proposals,

including the planned improvements at Warnford School, Highworth, and questioned whether the designations could constrain the delivery of these improvements.

A number of respondents also considered that the policy lacks sufficient ambition and contains weak or overly flexible wording in relation to green infrastructure provision. Respondents argued that stronger policy requirements and obligations are needed to ensure the effective protection, enhancement and delivery of green infrastructure and associated environmental benefits.

How the main issues were taken into account:

We acknowledge the representations regarding the proposed Green Infrastructure (GI) Network and Open Space (OS) designations at Highworth Warnford School. It should be clarified that these strategic designations are not intended to preclude necessary educational development or essential site upgrades. Rather, the specific impact of the GI and OS designations on the school's improvement plans is a detailed matter to be appropriately assessed and resolved through a formal planning application.

We acknowledge the representations regarding the Green Infrastructure (GI) requirements within the emerging Local Plan. The Council considers that the proposed GI obligations are proportionate in their scope, securing necessary environmental enhancements. Furthermore, the policy framework has been carefully formulated to be fully compatible with current national planning policy,

CSE5: Great Western Community Forest

Summary of main issues raised:

Respondents generally supported the objectives of the policy but raised concerns regarding its scope and application. One respondent suggested that the policy should make specific reference to the Western Forest initiative to strengthen its strategic context and recognise opportunities for woodland creation and environmental enhancement.

Several respondents also questioned the policy's applicability, expressing concern that its requirements appear to relate only to major developments. These respondents argued that the policy should apply more broadly, or provide greater clarity on its intended scope, to ensure that opportunities for environmental enhancement and green infrastructure provision are secured across all forms of development rather than being limited to major schemes.

How the main issues were taken into account:

Please note, “Policy CSE5: Great Western Community Forest” presented in the Reg 18 Consultation Draft, has been renamed and recoded to “Policy CSE8: Great Western Community Forest” in the Regulation 19 Publication Version.

The local plan has insufficient evidence to justify applying GWCF objectives to all development in the borough.

CSE6: Trees

Summary of main issues raised:

Respondents raised a range of concerns regarding the deliverability, justification and implementation of the policy's tree planting and canopy cover requirements. A key issue was the requirement for major developments to achieve 25% future canopy cover, with several respondents questioning both its viability and the evidence underpinning the target. Particular concerns were raised regarding the practicality of achieving the requirement on constrained sites and whether the target had been adequately tested and justified.

Respondents also sought greater clarity on how the policy would operate in practice. Queries were raised regarding whether green roofs could contribute towards canopy cover requirements, how the Council would monitor and assess canopy cover delivery over time, and how off-site contributions to the Great Western Community Forest would be calculated and applied.

A number of respondents commented on the approach to tree planting and long-term management. Some considered that tree planting should be led by design and local context rather than prescribed standards. Others suggested that Policy CSE6 should provide stronger guidance on the selection of low-maintenance tree species and should include requirements for appropriate aftercare, replacement planting and ongoing management to ensure that newly planted trees survive and reach maturity.

Respondents also emphasised the importance of protecting existing tree assets. One respondent suggested that the policy should explicitly recognise and protect ancient trees, whilst others highlighted the need to ensure that canopy cover and tree planting requirements are realistic, deliverable and capable of providing long-term environmental benefits. Overall, respondents were supportive of increasing tree cover and urban greening but sought greater clarity, stronger evidence and more detailed guidance on implementation, monitoring and long-term management.

How the main issues were taken into account:

Please note, “Policy CSE6: Trees” presented in the Reg 18 Consultation Draft, has been renamed and recoded to “Policy: CSE9 Woodland, Trees and Hedgerows” in the Regulation 19 Publication Version.

This local plan considers that 25% Urban Canopy cover is an ambitious but justifiable target, in-line with national ambitions and local targets in the Great Western Community Forest Plan. The express protection of ancient trees is outlined by the GWCF Plan 2025 and corresponding local plan policy CSE5. Canopy cover % is monitored and updated through the Great Western Community Forest Plan 2025 and its future iterations. The local plan will also monitor the number of permissions for major development meeting a canopy cover of a minimum of 25% at the site, or offsite contributions where this cannot be met.

CSE7: Landscape and Areas of Non-Coalescence

Summary of main issues raised:

Respondents raised concerns regarding the justification, definition and effectiveness of the Areas of Non-Coalescence, particularly the evidence supporting their extent and relationship to physical features. Comments also sought clearer and stronger policy wording, including enhanced protection for landscape character and the North Wessex Downs National Landscape, and greater clarity on how the policy criteria should be applied.

How the main issues have been taken into account:

Please note, Policy CSE7: Landscape and Areas of Non-Coalescence presented in the Reg 18 Consultation Draft has been renamed and recoded to Policy CSE10: Landscape.

Policy criteria relating to Areas of Non-Coalescence has been moved to Policy SS2: Settlement Hierarchy to better contextualise the criteria. Some areas have been amended to follow functional boundaries. Greater emphasis has been placed on the conservation and enhancement of the North Wessex Downs Landscape with clearer and more robust policy wording to provide stronger protections, particularly in relation to major development. The policy has also been clarified to provide greater certainty regarding the criteria requirements that will apply to development proposals.

CSE8: Biodiversity, Geodiversity and Nature Recovery

Summary of main issues raised:

Respondents generally supported the objective of increasing tree cover and enhancing green infrastructure but raised a range of concerns regarding the justification, deliverability and implementation of the policy. A significant proportion of

responses focused on the requirement for major developments to achieve 25% future canopy cover, with respondents questioning both the evidence underpinning the target and its practical application. Several respondents, particularly from the development sector, raised concerns about the viability and feasibility of achieving the requirement on constrained and brownfield sites, noting that competing development requirements and site-specific limitations may restrict opportunities for large-scale tree planting.

Respondents also sought greater clarity regarding how the policy would operate in practice. Questions were raised over whether features such as green roofs could contribute towards canopy cover targets, particularly if the policy were renamed or broadened to reflect wider greening objectives. Concerns were also expressed about how the Council would monitor, measure and enforce canopy cover requirements over time, given that canopy growth occurs over many years and can be affected by management and environmental factors.

Long-term management and maintenance emerged as key themes. Several respondents highlighted the ongoing costs associated with tree planting and canopy cover delivery, including future maintenance liabilities. Respondents suggested that the policy should provide greater clarity on maintenance responsibilities and long-term stewardship arrangements. Some comments advocated a more design-led approach to tree planting, arguing that planting should respond to local character, site context and place-making objectives rather than relying solely on standardised targets. Other respondents suggested that Policy CSE6 should provide guidance on the use of low-maintenance and climate-resilient tree species to improve long-term success and reduce management burdens.

Respondents also emphasised the need to maximise the environmental benefits of tree planting. Suggestions included explicitly protecting ancient trees, strengthening requirements for aftercare and replacement planting, and ensuring that developers are responsible for maintaining newly planted trees until they become established. Respondents considered that replacement obligations for failed trees would help ensure canopy cover targets are achieved in practice rather than simply secured at the point of permission.

A number of respondents sought clarification regarding the relationship between on-site and off-site provision. In particular, requests were made for greater detail on how contributions to the Great Western Community Forest would operate, including the circumstances in which off-site contributions would be accepted and how such contributions would be calculated and delivered.

Overall, whilst respondents broadly supported the policy's aims of increasing tree cover, improving environmental quality and contributing to climate resilience, they sought greater evidence for the proposed canopy cover target, clearer implementation and monitoring arrangements, stronger provisions for tree protection and long-term management, and greater flexibility to respond to the constraints of individual development sites.

How the main issues have been taken into account:

Please note, "Policy CSE8: Biodiversity, Geodiversity and Nature Recovery" presented in the Reg 18 Consultation Draft has been recoded to "Policy CSE11: Biodiversity, Geodiversity and Nature Recovery" in the Regulation 19 Publication Version.

Swift Bricks are now referred to within the supporting text, requiring developments to include integrated nest boxes. The policy wording for species enhancement has been strengthened. The Wiltshire Local Plan has not been used as a reference for this policy because Wiltshire Council is currently preparing a new Local Plan which has yet to be published.

Schedule 7A of the Town and Country Planning Act 1990 establishes a mandatory minimum 10% biodiversity net gain (BNG) requirement for applicable developments. There is insufficient evidence to justify requiring a BNG above the statutory minimum reinforced by guidance in the new NPPF which limits BNG to 10% .

The requirements for SANG to mitigate the recreational pressures on the North Meadows and Clattinger Farm Special Area of Conservation is outlined in site policies but cannot be represented on concept plans since doing so would be premature in advance of planning applications for schemes on local plan allocations. The requirement has been retained within the policy to provide clarity to developers regarding the Council's expectations.

Explicit references are now made throughout the policy to the Wiltshire and Swindon Local Nature Recovery Strategy. The BNG delivery hierarchy is clearly set out within both the policy and supporting text. There is also greater clarity regarding the locations of BNG, for example, where off-site provision is proposed, this should be clearly demonstrated as being outside the red-line boundary but within the blue-line boundary. The supporting text now explains the purpose of BNG and clarification on the different forms of habitat gain through each stage of the hierarchy. This is intended to avoid any misinterpretation when considering habitat gain. The supporting text recognises sustainable drainage systems (SuDs) as a nature-based solution that can provide biodiversity benefits. However, whether this can contribute towards the BNG requirement is dependent on whether the resulting habitats are eligible to be included within the Statutory Biodiversity Metric.

CSE9: Managing Flood Risk

Summary of main issues raised:

Respondents generally supported the objectives of managing flood risk and promoting Sustainable Drainage Systems (SuDS), but raised concerns regarding the policy's scope, implementation and alignment with national guidance. Thames Water supported the use of SuDS to reduce surface water entering the foul sewerage system and emphasised that developers should remain responsible for managing surface water drainage to ground and watercourses, with the policy wording reflecting this.

A number of respondents, including Natural England, highlighted the need to review the policy and supporting evidence to ensure consistency with the September 2025 Planning Practice Guidance (PPG) updates. Respondents sought updates to the approach to the sequential test and flood risk assessment process, while the Environment Agency recommended that the Strategic Flood Risk Assessments (SFRAs) and other flood risk evidence be updated accordingly.

Several respondents called for stronger and more integrated approaches to drainage and environmental management. Suggestions included requiring compliance with DEFRA SuDS standards, recognising SuDS as both green infrastructure and open space, and strengthening links between SuDS, green infrastructure and biodiversity objectives. Natural England also emphasised the relationship between flood risk management, water quality and impacts on designated sites, habitats and species.

Respondents raised concerns regarding the application and effectiveness of the policy, with some suggesting that flood risk and drainage requirements should apply more broadly than major development alone. Others considered that greater emphasis should be placed on preventing off-site flooding and ensuring new development does not increase flood risk elsewhere. Comments also highlighted the need for long-term management arrangements, including flood attenuation infrastructure and river corridor maintenance, to be clearly communicated to residents.

Finally, respondents sought greater flexibility within the policy framework. One respondent argued that SuDS should not be automatically ruled out within Flood Zone 3, noting that suitably designed schemes may still be appropriate in certain circumstances. Overall, respondents supported the policy's objectives but sought stronger alignment with national guidance, improved integration of flood risk and environmental considerations, clearer responsibilities and broader application of policy requirements.

How the main issues were taken into account:

Please note, “Policy CSE9: Managing Flood Risk” presented in the Reg 18 Consultation Draft has been recoded to “Policy CSE12: Managing Flood Risk” in the Regulation 19 Publication Version.

The supporting text to the policy explicitly states, ‘it is the responsibility of the developer to make proper provision for surface water drainage to ground, water courses or surface water sewer’. Management plans for river corridors are now addressed within Policy CSE13:

Protection and Enhancement of the Water Environment. This policy has been updated to reflect the September 2025 updates to the planning practice guidance (PPG). Policy CSE9 requires all major and non-major developments to incorporate SuDS which must follow the national standards published by DEFRA (2025).

Policy CSE6: Green Infrastructure in New Developments and Policy CSE7: The Green and Blue Infrastructure Network recognise SuDS as green infrastructure. However, the policies state that land used for SuDS, particularly with a flood water capture function, will not be included in the calculation of open space developer contributions, as the two contributions are intended to address different needs.

This policy states ‘all major developments and non-major developments involving new buildings’ when referring to SuDS, and the supporting text refers to ‘all developments’ aiming to apply the policy to all development types. The policy and supporting text strengthen wording surrounding the risk of off-site flooding, stating proposals for development must ‘avoid and minimise the risk of flooding from all sources and not increase flood risk elsewhere’ and ‘it is essential that development does not increase flood risk to surrounding areas’.

CSE10: Unstable Land

Summary of main issues raised:

One respondent raised concerns that the policy on unstable land does not adequately consider the implications of tall buildings, suggesting that the relationship between land stability and the design, location and delivery of taller structures should be more clearly addressed within the policy.

How the main issues were taken into account:

Please note, “Policy CSE10: Unstable Land” presented in the Reg 18 Consultation Draft, has been recoded to “Policy CSE14: Unstable Land” in the Regulation 19 Publication Version.

It requires permissions to secure remedial measures which achieve a level of land stability suitable for the proposed use, alongside a land stability evaluation report. Therefore, policy requirements apply irrespective of the scale, height or nature of the

proposed development and a specific reference to tall buildings was not considered necessary.

CSE11: Contaminated Land

Summary of main issues raised:

Respondents generally supported the need for a robust approach to contaminated land management but suggested amendments to strengthen and clarify the policy. Comments included proposals for stronger policy wording, revised drafting to improve effectiveness, and greater flexibility in the range of remediation and mitigation measures that would be considered acceptable.

How the main issues were taken into account:

Please note, “Policy CSE11: Contaminated Land” presented in the Reg 18 Consultation Draft, has been recoded to “Policy CSE15: Contaminated Land” in the Regulation 19 Publication Version.

The wording of the policy has been strengthened and aligns with the rephrasing suggested by The Environment Agency and Swindon Borough Council Pollution Specialists.

CSE12: Reducing Noise and Pollution

Summary of main issues:

Respondents generally supported the policy's objectives but sought a stronger and more comprehensive approach to managing pollution and environmental impacts. Oxfordshire County Council recommended that the policy should require air quality, noise and vibration assessments as part of the planning application process to ensure potential impacts are properly identified and addressed.

National Highways supported the policy and encouraged a proactive approach to mitigating noise and air quality impacts associated with the Strategic Road Network. It emphasised that mitigation measures should, wherever possible, be delivered within development sites to avoid future maintenance issues and encroachment onto highway land.

Several respondents sought stronger policy wording and additional guidance relating to water pollution and water quality management. Concerns were also raised regarding the absence of clear commitments, monitoring arrangements and implementation measures, with respondents suggesting that a more robust framework is required to ensure pollution impacts are effectively mitigated and environmental outcomes are delivered over the long term.

How the main issues were taken into account:

The policy has been strengthened through including air quality and noise and vibration assessments which will be required to support major development applications. Where impacts from SRNs are concerned, pollution impacts will be assessed and addressed. Policy wording has been strengthened to prevent the permission of development proposals that would result in deterioration in the chemical or ecological status of a waterbody.

The supporting text refers to The EU Water Framework Directive (WFD) and Thames River Basin Management which provides protection for drinking water quality and achieving good ecological status in water bodies. This policy is in alignment with the NPPF (2024) and sets out requirements for proposals to minimise and mitigate pollution impacts in which applications will be assessed. Monitoring arrangements for this policy can now be found in the monitoring framework. The policy requires proposals to not interfere with the implementation of the current Air Quality Action Plan. Water quality requirements similarly align with the objectives of the relevant River Basin Management Plan.

Other general comments relating to Chapter 9

Summary of main issues:

Respondents raised a range of comments on the chapter's supporting text, particularly regarding its ambition, evidence base and alignment with national policy. Several respondents suggested that the introductory text should be revised to better reflect the Council's obligations under the National Planning Policy Framework (NPPF) and its declared Climate Emergency. Respondents also identified a number of drafting issues, including incorrect NPPF references, typographical errors, inconsistent clause numbering, and the need to verify references and gas usage data derived from the Swindon Carbon Inventory.

A recurring theme was that the chapter lacks sufficient ambition in addressing climate change and carbon reduction. Respondents argued that it should provide stronger guidance on achieving net zero, including support for local renewable energy generation, emissions reductions from both new and existing buildings, and the role of trees, green spaces and natural habitats in mitigating and adapting to climate change. Several respondents noted that the chapter focuses predominantly on new development and does not adequately address improvements to the existing building stock.

Respondents also suggested that the chapter should be strengthened to address a wider range of environmental issues. This included clearer policy guidance on climate adaptation, stronger carbon reduction measures, improved water quality, the contribution of trees to tackling climate change, and the management of light pollution, which some respondents considered to be insufficiently addressed. Overall, respondents sought a more ambitious, evidence-led and comprehensive

chapter, with stronger links to climate change mitigation and adaptation objectives and greater consistency with national policy and the Council's climate commitments.

How the main issues were taken into account:

The chapter's introductory text has been improved and formatting corrected, with the council's obligations under the NPPF and the declared climate emergency detailed within Policy CSE1: Mitigation and Adaptation to Climate Change supporting text.

The introduction of Policy CSE4: Adaptive Reuse and Retrofit supports the reuse of existing built assets, broadening the scope beyond new developments. The gas usage figures cited from the Swindon Carbon Inventory have been removed, as they do not form part of the new Regulation 19 policy. Figures from the Swindon Carbon Inventory within the policy have been reassessed and NPPF references reconfirmed to improve accuracy.

Within the climate policies, requirements for developers have been set out in accordance with national standards. Setting energy efficiency standards that go beyond would not be considered robustly justified or viable.

Improving water quality is referred to within Policy CSE16: Pollution.

The addition of new policies CSE4: Adaptive Reuse and Retrofit and CSE5: Renewable Energy further address carbon reduction and emissions from new and existing buildings. T

The supporting text for Policy CSE9: Woodland, Trees and Hedgerows outlines the services trees provide within the urban environment, emphasising their role in addressing climate change.

Policy wording strengthened within Policy CSE10: Landscape to require proposals to demonstrate how light pollution has been avoided and mitigated. All proposals will be expected to demonstrate clear regard to the guidance set out in Dark Skies of the North Wessex Downs – A Guide to Good External Lighting (2021).

Chapter 10: A Healthy, Socially Connected Swindon

Summary of main issues raised:

Respondents highlighted the need for health considerations to be more fully integrated throughout the chapter and related policies. In particular, comments sought the inclusion of a range of health priorities identified by the Council to ensure that health and wellbeing outcomes are embedded more consistently across the Plan's vision, objectives and policy framework.

How the main issues were taken into account:

The introduction to Chapter 10 refers to Swindon's Health and Wellbeing Strategy 2023-2033 and outlines how policies within the new Local Plan aim to address the Borough's health and wellbeing priorities.

SP7: Healthy Living

Summary of main issues raised:

Respondents generally supported the policy's focus on creating healthy places, but many sought stronger, clearer and more comprehensive requirements to support health, wellbeing and environmental outcomes. Wiltshire Wildlife Trust supported the Plan's overall ambitions but called for stronger and more consistent commitments to nature recovery, biodiversity enhancement and green infrastructure. In particular, the Trust advocated closer alignment with the Local Nature Recovery Strategy, stronger policy wording and enforceability, greater use of the mitigation hierarchy and ecological surveys, the application of green infrastructure requirements to a wider range of development types, and the adoption of a 20% Biodiversity Net Gain requirement.

NHS Property Services welcomed the inclusion of a standalone health policy and supported its emphasis on healthy placemaking. However, it recommended stronger policy requirements relating to early engagement with health partners, active travel, access to green space, healthy food environments, climate resilience, inclusive design, health infrastructure provision and key worker housing. NHS Property Services also suggested that the policy should be more closely aligned with the Swindon Health and Wellbeing Integrated Care System Strategy 2023-2033 and the Bath and North East Somerset, Swindon and Wiltshire Integrated Care Strategy 2023-2028, and emphasised the importance of ensuring development responds to identified health needs and supports the delivery of healthier communities.

Sport England welcomed the policy and suggested that reference should be made to Sport England's Active Design Guidance to strengthen the policy's approach to promoting active and healthy lifestyles.

Overall, respondents were supportive of the policy's objectives but sought stronger health, biodiversity and green infrastructure requirements, greater alignment with relevant health and environmental strategies, and clearer mechanisms to ensure the delivery of healthy, sustainable and resilient communities.

How the main issues were taken into account:

Please note, "Policy SP7: Healthy Living" presented in the Reg 18 Consultation Draft, has been deleted to avoid duplication and to improve the clarity of the plan.

The key principles are supported through a range of policies across the Local Plan. These include policies relating to active travel, green space, healthy food environments, climate resilience, inclusive design, key worker housing and healthcare provision. Early engagement with health partners is encouraged through the planning process. Chapter 10: A Healthy, Socially Connected Swindon has been informed by the Health and Wellbeing Strategy 2023 -2033 and Joint Strategic Needs Assessment. These documents have been used because they provide an up-to-date evidence base which covers the Plan period and reflects the needs of the borough. The Sports England's Active Design Guidance has not been referenced in any relevant policies, however, it has been considered within the Sports Action Plan and strategies have been prepared.

HL1: Health Impact Assessments

Summary of main issues raised:

Respondents raised a range of issues regarding the role, scope and implementation of Health Impact Assessments (HIAs). One respondent suggested that the assessment criteria should place greater emphasis on the physical and mental health and wellbeing benefits of development, including those associated with active travel and opportunities for walking and cycling.

Bath and North East Somerset, Swindon and Wiltshire Integrated Care Board (BSW ICB) supported the objective of promoting healthier development but raised concerns regarding the resourcing and implementation of the policy, given the potentially large number of planning applications that could require a HIA. BSW ICB also questioned the justification for applying HIA requirements to non-residential development, expressing concern that this could place unnecessary financial burdens on the delivery of essential infrastructure, including healthcare and education facilities.

BSW ICB further considered that the policy lacks clarity regarding the purpose and intended benefits of HIAs. It suggested that the policy should demonstrate how HIA findings have informed development proposals and ensure that any residual health impacts are addressed through planning conditions or planning obligations where necessary. To support implementation, BSW ICB recommended the preparation of

additional guidance, potentially through a Supplementary Planning Document developed in partnership with public health bodies and the NHS.

Respondents from the development sector also sought greater clarity regarding how HIAs would be applied through the planning process. Some questioned whether requiring HIAs would be an effective means of achieving the policy's health and wellbeing objectives and suggested that the policy should instead focus on clear development principles and design measures that actively promote healthy lifestyles and wellbeing outcomes. Overall, respondents supported the importance of health and wellbeing within the planning system but sought clearer justification, implementation guidance and proportionality in the application of HIA requirements.

How the main issues were taken into account:

The supporting text has been updated to clarify the purpose and application of Health Impact Assessments (HIAs). It now recognises active travel as a determinant of health that will be evaluated within a HIA. It has been amended that developments containing education, health and community facilities are no longer required to submit a HIA. The supporting text outlines the benefits of a HIA and confirms that they should be submitted in support of an initial planning application.

Any further mitigation secured through conditions or obligations will be addressed with the relevant case officer. Public Health England's 'Health Impact Assessment in spatial planning' guidance is referenced to provide developers with a scoping framework and assist with implementation. This removes the need for a separate Supplementary Planning Document (SPD), particularly as the current approach is to phase out SPD, with the final adoption date having been 30th June 2026. Design principles to promote health and wellbeing are addressed with Chapter 4: High-Quality Development & Placemaking.

HL2: Protecting Open Spaces

Summary of main issues raised:

Respondents raised a range of comments regarding the designation and management of open space. One respondent sought clarification on the designation of Land at East Wichel as Open Space, while a number of respondents supported the proposed designation of the former Highworth Golf Course as a Local Green Space (LGS). However, another respondent argued that the former golf course represents a missed opportunity for sustainable development.

Respondents also commented on the protection and management of green infrastructure assets. One respondent suggested that allotments should receive stronger protection through designation as a Green Infrastructure (GI) Corridor.

Concerns were also raised regarding the future management of open spaces and associated costs. Several respondents questioned whether the proposed "first refusal" approach to open space management could result in residents being subject to double charging, and sought greater clarity on the financial implications of the policy and how open space maintenance arrangements would operate in practice.

How the main issues were taken into account:

A number of representations requested a review of Open Space designations. Land to the north of East Wichel Community Primary School and south of the Old Town Railway Path is to be designated Open Space in the submission version of the Local Plan since it meets the criteria for designation as Open Space.

A large number of representations were received concerning Highworth's Old Golf Course requesting it be designated as Local Green Space (LGS). Highworth's Old Golf Course is to remain as Open Space in the New Local Plan, the same as it is currently designated in the adopted Local Plan. Criteria for designation as a LGS has been tested through the independent examination of the new Highworth Neighbourhood Plan and has not been met.

The 'first refusal' for management of Open Spaces by town and parish councils gives them the first opportunity to take over and maintain green areas or amenities created in new development. This safeguards public access, prevents poor private maintenance, and protects communities from unexpected management company fees.

The Green Infrastructure Strategy is to be updated in line with the local plan including the accompanying mapping of GI corridor.

HL3: Open Space in New Developments

Summary of main issues raised:

Respondents raised a range of comments regarding the management of public open space in new developments. Concerns focused particularly on the operation and terms of future management arrangements, with several respondents questioning whether proposed management models would provide an effective and cost-efficient means of maintaining open space over the long term.

Several respondents supported the principle of giving Parish Councils the right of first refusal to manage new public open spaces but emphasised the importance of early engagement in the design and planning process to ensure that open spaces are designed and resourced appropriately for future adoption and management.

Respondents also raised concerns regarding the scope of the policy, with one respondent questioning why the requirements apply primarily to major developments

rather than a wider range of development types. In addition, several respondents expressed concerns that Public Open Space Management Companies may not represent the most cost-effective approach to long-term management and maintenance, highlighting potential implications for residents and the ongoing stewardship of open spaces.

How the main issues were taken into account:

The 'first refusal' for management of Open Spaces by town and parish councils gives them the first opportunity to take over and maintain green areas or amenities created in new development. This safeguards public access, prevents poor private maintenance, and protects communities from unexpected management company fees. Whilst the policy does apply to major development only, the threshold for major development is relatively low. The council lacks the sufficient evidence requiring public Open Space on small development.

HL4: Child Friendly Places and Play

Summary of main issues raised:

Respondents raised a range of concerns regarding the provision, timing and inclusivity of play facilities within new developments. Several respondents highlighted that play areas are often delivered towards the end of the development process and suggested that the policy should place greater emphasis on securing timely delivery alongside new housing.

Respondents also considered that the policy should take a broader approach to play provision. Concerns were raised that it does not adequately support facilities for all age groups, with comments suggesting that a wider range of formal and informal play opportunities should be encouraged. Some respondents also highlighted a lack of recognition of natural play and suggested that the policy should provide stronger support for nature-based play environments as part of wider green infrastructure and open space networks.

Inclusivity was a further recurring theme. Respondents expressed concern that the policy does not sufficiently address inclusive play provision or ensure that facilities are accessible to children and young people with a range of needs and abilities. In addition, one respondent noted that the policy focuses primarily on the provision of new facilities and does not adequately consider the improvement, enhancement and long-term quality of existing play spaces.

Overall, respondents supported the provision of high-quality play facilities but sought stronger policy measures relating to the timing of delivery, inclusivity, natural play

opportunities, provision for different age groups and the enhancement of existing facilities.

How the main issues were taken into account:

The requirement for the amount and type of play space is objectively assessed through the Open Space Assessment, and standards for the local plan produced on this basis. Standards are based on Fields in Trust best practice guidance. Natural play is encompassed in the supporting text which outlines expectations on play to come forward in a landscape-led design and layout, including accessible play.

HL5: Community Infrastructure

Summary of main issues:

Respondents generally supported the provision of community infrastructure to support planned growth, although several sought stronger policy requirements and a broader approach to infrastructure delivery across the Borough. A respondent from the development sector welcomed the policy but suggested that infrastructure investment should not be focused solely on the Town Centre and should instead reflect the differing locational needs of community facilities and services.

Respondents also highlighted the importance of ensuring that schools and other community facilities are accessible by walking and cycling through improved active travel links and green corridors. Some respondents further argued that leisure facilities should be recognised as essential infrastructure and provided as part of major development schemes.

Education and healthcare infrastructure were recurring themes. One respondent raised concerns that the policy does not provide sufficient commitment to replacing lost education infrastructure or meeting Special Educational Needs and Disabilities (SEND) requirements in growth areas, and suggested that major developments of over 500 dwellings should be required to provide education and SEND infrastructure where necessary.

Bath and North East Somerset, Swindon and Wiltshire Integrated Care Board (BSW ICB) supported the policy but recommended a stronger approach to healthcare infrastructure planning. BSW ICB emphasised that smaller developments should also contribute towards community infrastructure, particularly healthcare provision, and sought clearer recognition of the Integrated Care Board's role in the planning and delivery of healthcare infrastructure. The Board also highlighted the importance of supporting both on-site and off-site healthcare provision, noting that healthcare needs are frequently met through the expansion, reconfiguration or improvement of existing facilities rather than the provision of new standalone facilities. BSW ICB further recommended that the policy support appropriate alternative uses for

redundant NHS sites and reflect emerging neighbourhood-based healthcare delivery models.

BSW ICB also expressed concerns that policies protecting community facilities could unintentionally restrict the NHS's ability to rationalise its estate and reinvest in modern healthcare provision. Similarly, one respondent argued that the policy should be strengthened to prevent the loss of important community infrastructure through viability arguments, expressing concern that viability assessments can be used to justify the removal of facilities that remain necessary for communities.

Overall, respondents supported the principle of infrastructure-led growth but sought stronger requirements relating to education, healthcare and leisure provision, improved accessibility to community facilities, and greater certainty that infrastructure will be delivered alongside development and adapted to changing community needs.

How the main issues were taken into account:

Please note that “Policy HL5: Community Infrastructure” presented in the Reg 18 Consultation Draft, has been deleted and renamed with “Policy HL6: Community Facilities” in the Regulation 19 Publication Version. This is to improve the clarity of the plan.

NPPF elaborates on definition of community facilities and explains that it includes social, recreational and cultural facilities such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship. On the other side community infrastructure includes facilities such as education, healthcare, open space.

To avoid confusion a new policy has been introduced under HL6: Community Facilities which ensures provision of social and cultural facilities and provision of other essential infrastructure is covered under Policy INF1. The policy ensures that all new community facilities are well connected through sustainable transport modes and prioritise town centre and other district and local centres as suitable location to enhance connectivity and accessibility. We recognise the leisure facilities are important infrastructure however instead of mandating for every major development, the plan considers IDP and Indoor and Outdoor Sports Assessment to explain capacity and location of such facilities.

Other general comments relating to Chapter 10

Summary of main issues raised:

Swindon Borough Council's Public Health Team broadly supported the Plan's integration of health but recommended stronger and more explicit policy links to health inequalities, inclusive green infrastructure, child-friendly and accessible play spaces, unhealthy commodities, and healthy housing design. They also sought

clearer implementation mechanisms for Health Impact Assessments, stronger alignment with health evidence and strategies, and more explicit requirements for developers to deliver inclusive, accessible and health-supportive environments.

How the main issues were taken into account:

The Council welcomed the detailed representations from the Public Health Team and reviewed the chapter and associated policies considering the comments received. The Regulation 19 Plan strengthens several policies, including those relating to Health Impact Assessments, healthy placemaking, play provision and the avoidance of over-concentrations of uses that may adversely affect health and wellbeing. Supporting text and policy wording have been refined to provide greater clarity on implementation and the delivery of healthy, inclusive and accessible environments. Taken as a whole, the Healthy Places chapter seeks to support healthier lifestyles and improve health outcomes across the Borough. The Council welcomes the continued engagement of the Public Health Team in the preparation and implementation of the Local Plan.

Chapter 11: Utilities

U1: Wastewater, Sewage Infrastructure and Water Supply

Summary of main issues raised:

Respondents generally supported stronger water efficiency measures and the use of water reuse technologies, although concerns were raised regarding the viability, deliverability and evidential basis of some requirements. Thames Water and Wiltshire Council supported the policy's emphasis on early engagement between developers and water companies to help coordinate infrastructure delivery and ensure water and wastewater infrastructure requirements are understood at an early stage. A number of respondents from the development sector raised concerns that the policy could make development dependent on existing utility infrastructure capacity and objected to developers being expected to fund what they considered to be historic underinvestment in water infrastructure.

Concerns were also raised that water reuse technologies and enhanced water efficiency standards, particularly those linked to drought resilience, could affect development viability. Several respondents therefore argued that water efficiency requirements should align closely with current and emerging Building Regulations. Swindon Borough Council's Build a Greener Swindon Committee supported the policy's objectives but recommended that it be strengthened through explicit reference to DEFRA's National Standards for Sustainable Drainage Systems (SuDS), considering that the current approach does not go far enough to meet best practice standards.

The Environment Agency recommended that the policy be strengthened through references to Water Framework Directive objectives, Environment Act commitments

and future climate change scenarios. It also raised concerns regarding the scope and baseline information used within the Water Cycle Study Scoping Report, noting that some data and assumptions are incorrect or out of date.

Thames Water additionally highlighted the need for the Plan to consider potential odour impacts from sewage treatment works located near development sites. More broadly, respondents sought a more integrated approach to water management, infrastructure planning and climate resilience, whilst ensuring that policy requirements remain proportionate, evidence-based and deliverable.

How the main issues were taken into account:

Please note, “Policy U1: Wastewater, Sewage Infrastructure and Water Supply presented in the Reg 18 Consultation Draft, has been recoded to “Policy: INF2 Wastewater, Sewage Infrastructure and Water Supply in the Regulation 19 Publication Version.

First, it must be noted that elements of formerly Policy U1 have been moved to Policy CSE12: Managing Flood Risk, including water re-use measures and Sustainable Drainage Systems (SuDS). We acknowledge the concerns raised by respondents from the development sector over the policy. However, it is essential that the approval of new development is dependent on the provision of water infrastructure. This accords with national policy, notably paragraphs 162-164 and paragraph 187 of the NPPF (2024), in that Local Plans must mitigate the impacts of climate change and new development on water supply, water quality, and biodiversity.

Further, given that the Environment Agency has classed the area served by Thames Water which includes Swindon borough as in ‘serious water stress’, it is important that the Plan encourages the use of water re-use technologies in new development wherever possible. In light of the borough’s ‘serious water stress’, Policy INF2 has also been amended to implement a stricter water use efficiency standard for new residential developments of 100l/person/day. This goes further than the current Building Regulations water efficiency standard suggested by some respondents.

Moreover, we acknowledge the Environment Agency’s comments regarding the policy. Part 1 a. of Policy INF2 has been amended to include the requirement for development to consider the impact of climate change on the water supply. While Policy INF2 has not been amended to reference the Water Framework Directive objectives or the Environment Act commitments, CSE13: Protection and Enhancement of the Water Environment does encourage development to meet WFD objectives.

The Council also acknowledges Thames Water and the Environment Agency’s comments regarding the need for an odour assessment and the scope and data used in the Water Cycle Study: Scoping Report. To support the Regulation 19 Local Plan, the Council has prepared the Water Cycle Detailed Study (2026). It has looked

to address the concerns raised by Thames Water and the Environment Agency. The Water Cycle Detailed Study (2026) includes an odour assessment of site allocations close to Sewage Treatment Works (STWs). It has also looked to correct inaccurate data used in the Scoping Report, using up-to-date data provided by Thames Water. The Detailed Study further has a broader scope, taking into account the impact of the emerging Swindon Local Plan's site allocations on Sewage Treatment Works outside of the borough and the impact of development from neighbouring authorities on the borough's STWs.

U2: Digital Connectivity and Telecommunications

Summary of main issues raised:

Respondents generally supported the objective of enhancing digital connectivity but raised concerns that the policy wording is insufficiently robust to secure the necessary infrastructure. Several respondents argued that the policy should be strengthened through clearer and more specific requirements, including the provision of full-fibre broadband infrastructure within new developments.

Respondents also sought stronger guidance relating to telecommunications infrastructure, suggesting that the policy should include clearer design, siting and assessment criteria to minimise visual impacts and effects on residential amenity. Overall, respondents considered that stronger and more explicit policy requirements are needed to support digital connectivity while ensuring telecommunications infrastructure is sensitively integrated into its surroundings.

How the main issues were taken into account:

Please note, "Policy U2: Digital Connectivity and Telecommunications" presented in the Reg 18 Consultation Draft, has been recoded to "Policy INF3: Digital Connectivity and Telecommunications" in the Regulation 19 Publication Version.

We recognised that policy requires stronger policy wording. the policy is now requiring provision of 5G technology and gigabit capable broadband or full fibre. The criteria-based policy statement is included to ensure the provision of essential digital and telecommunication infrastructure in the case of unavailability of relevant infrastructure in place. The policy also ensures minimisation of visual impact on surrounding areas.

U3: Energy Networks

Summary of main issues raised:

Respondents expressed support for renewable and low-carbon energy generation but raised concerns regarding the policy's implementation and relationship with infrastructure delivery. Respondents from the development sector argued that planning decisions should not be delayed by the availability of electricity network

capacity, noting that connection timescales are often dependent upon Scottish and Southern Electricity Networks (SSEN) and outside the control of developers.

Oxfordshire County Council, alongside other respondents, supported a stronger policy focus on renewable and low-carbon energy development. Respondents considered that the policy should maximise opportunities for renewable energy generation, contribute to energy supply diversification and reduce reliance on the national grid. They also advocated a more multifunctional approach to land use, including combining renewable energy schemes with food production, carbon sequestration, biodiversity enhancement and community access where appropriate.

Overall, respondents supported the expansion of renewable and low-carbon energy infrastructure but sought greater flexibility regarding energy network constraints and stronger policy support for integrated, multifunctional approaches to energy generation and land management.

How the main issues were taken into account:

Please note, “Policy U3: Energy Networks” presented in the Reg 18 Consultation Draft, has been recoded to “Policy INF4: Energy Networks” in the Regulation 19 Publication Version.

We understand that planning decision should not be held up if the electricity connection capacity is unavailable. However, it is essential to ensure the efficient and timely delivery of energy infrastructure. For this reason, the policy now ensures provision of relevant infrastructure aligned with development phasing through include infrastructure capacity assessment in energy masterplans. The policy was lacking focus on proposals for renewable and low carbon energy which is covered under Policy CSE5: Renewable Energy which encourages community led renewable projects and other low carbon energy generations through criteria-based policy to mitigate any adverse impact on surrounding context.

The NPPF (2024) states that, in order to increase the use and supply of renewable and low carbon energy and heat, plans should provide a positive strategy for energy from these sources, that maximises the potential for suitable development, and their future re-powering and life extension. Additionally, It also asks to identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems. This policy mandates criteria-based consideration to provide sustainable energy generation to encourage decentralisation of national grid. All major developments are required to demonstrate that options for renewable and low carbon energy generations have been considered.

Other general comments relating to Chapter 11

Summary of main issues raised:

One respondent suggested strengthening the utilities and water policies to better address future water resource pressures and climate resilience. In particular, the respondent recommended aligning Sustainable Drainage Systems (SuDS) requirements with DEFRA standards, introducing more stringent water efficiency targets for new development, and requiring rainwater harvesting and water reuse measures. The respondent considered that these measures would help respond to increasing water stress and future constraints on water supply.

How the main issues were taken into account:

Please note, “Chapter 11 Utilities” presented in the Reg 18 Consultation Draft, has been renamed and recoded to “Chapter 10: Infrastructure and Developer Contributions” in the Regulation 19 Publication Version.

We recognise that stronger water efficiency targets need to be considered as part of this policy. As result, the policy introduces strongest standard of 100l/person/day referenced to Building Regulations Document G Part 2. the document is not adopted yet however; the policy is being considered given that the Borough lies in an area of 'serious water stress'. We recognise that SuDs minimise the pollution of urban run-off and improve water quality. It provides a more sustainable approach to managing rainfall by mimicking the way water moves naturally through sites. To improve soundness of overall plan, it is covered under Policy CSE12: Managing Flood Risk.

Chapter 12: Delivery and Implementation

D1: Developer Contributions and Viability

Summary of main issues raised:

Respondents generally supported the policy and its role in ensuring infrastructure is delivered alongside growth. Wiltshire Council expressed support for the policy, while a number of respondents sought greater clarity regarding its implementation, including how and when developer contribution payment triggers would operate in practice.

Several respondents commented on the relationship between development and infrastructure delivery. Some Ward Councillors argued that planning permission should be refused where adequate infrastructure provision cannot be demonstrated, reflecting concerns that growth should be supported by the timely delivery of necessary infrastructure.

Views were mixed regarding the proposed developer contribution priority list. National Highways welcomed the inclusion of road infrastructure, while NHS Property Services and the Bath and North East Somerset, Swindon and Wiltshire Integrated Care Board (BSW ICB) supported the recognition of health infrastructure. Other respondents suggested that active travel infrastructure should be included within the priority list, while one respondent considered that education infrastructure should be given a higher priority.

NHS Property Services and BSW ICB also recommended that the Plan include a dedicated section setting out the process for securing health infrastructure contributions. Both organisations emphasised the importance of continued engagement with the Council to identify and deliver appropriate healthcare infrastructure requirements arising from development.

Highworth Town Council highlighted the need for developer contributions to be ringfenced and prioritised towards local infrastructure provision, ensuring that communities directly affected by development receive the infrastructure necessary to support growth. Overall, respondents supported the principle of infrastructure-led development but sought greater clarity regarding implementation, contribution priorities and the mechanisms for securing infrastructure delivery.

How the main issues were taken into account:

Please note, “Policy D1: Developer Contributions and Viability” presented in the Reg 18 Consultation Draft, has been renamed and expanded as “Policy INF1: Infrastructure and Developer Contributions” in the Regulation 19 Publication Version. This is to improve the structure of the Plan and place greater emphasis on infrastructure provision in light of representations received.

The revised policy and supporting text provide greater clarity on infrastructure requirements, funding mechanisms, developer contributions, viability assessments and review mechanisms. Infrastructure needs across a range of sectors, including education, healthcare, transport, sports facilities, public realm, open space, emergency services and utilities, are now addressed more comprehensively.

The Reg 19 policy places greater emphasis on ensuring the right infrastructure is delivered at the right time, supported by early engagement between developers, the Council, infrastructure providers and statutory bodies to identify infrastructure requirements. The priority order for developer contributions included within the Regulation 18 draft has not been retained.

Infrastructure requirements will vary according to the needs and impacts of development, existing infrastructure capacity, and the requirements identified by infrastructure providers and statutory bodies. The Council therefore considers it more appropriate to determine infrastructure requirements on a case-by-case basis rather than through a fixed hierarchy of contributions. The policy is supported by the Infrastructure Delivery Plan and associated evidence base, prepared in consultation with infrastructure providers and other stakeholders, which identify the infrastructure required to support the Local Plan strategy. The supporting text also references the Council's annual Infrastructure Funding Statement, which provides transparency on the collection, allocation and expenditure of developer contributions.

Other general comments relating to Chapter 12

Summary of main issues raised:

Wiltshire Council welcomed the opportunity to continue engagement on the preparation of the Infrastructure Delivery Plan, particularly in relation to the identification and coordination of cross-boundary infrastructure requirements. Respondents therefore highlighted the importance of ongoing collaboration between neighbouring authorities to support the effective planning and delivery of infrastructure needed to accommodate future growth.

How the main issues were taken into account:

Wiltshire Council's comments were noted. The Council will continue to engage with neighbouring authorities on relevant cross-boundary infrastructure matters throughout the plan-making process.

Appendix 1: Site allocations

Summary of main issues raised:

Respondents raised a range of comments on the site allocations contained within Appendix 1. Several landowners and agents promoted additional sites for allocation and/or provided updated information relating to existing site allocations. One respondent objected to the proposed residential allocation at 18-033 Land west of

Shaw Village Centre, arguing that it would result in the loss of green space and increase pressure on local infrastructure, and suggested that the site should instead be allocated for community uses.

South Marston Parish Council highlighted an apparent discrepancy between the number of dwellings identified within Appendix 1 for the New Eastern Villages and the 10,000 homes referenced in Policy SGL02, and sought clarification on how the figures relate to one another.

Natural England raised ecological considerations in relation to a number of allocations, recommending that Phase 1 habitat surveys be undertaken on seven sites identified as having potential ecological value to ensure that biodiversity interests are properly understood and considered as part of the planning process.

How the main issues were taken into account:

Please note, "Appendix 1: Site Allocations" presented in the Reg 18 Consultation Draft, has been removed in the Regulation 19 Publication Version. The detail previously recorded here is now incorporated directly into the Sustainable Development Area site allocation policies in Chapter 3. This is to improve the effectiveness of the Plan.

Sites submitted through the 2025 Call for Sites process, or promoted through representations to the Regulation 18 consultation, have been added to the SHELAA database and assessed through the SHELAA (2026) process. Following further assessment, Land West of Shaw Village Centre is no longer proposed for allocation due to a lack of site availability. To improve clarity and consistency, the total housing provision for the New Eastern Villages is now identified within Policy SDA07: New Eastern Villages and aligns with the cumulative total of the individual site allocations. The Council considered Natural England's comments regarding ecological surveys. Where sites already benefited from planning permission or access for survey work could not be secured, further surveying was not undertaken as part of the plan-making process. Where additional ecological survey work has been completed, the findings have been incorporated into the Local Plan evidence base.

Appendix 2: Glossary

Summary of main issues raised:

Respondents sought greater clarity within the glossary and supporting terminology used throughout the Plan. Swindon Borough Council's Build a Greener Swindon Committee highlighted that key terms such as "sustainability" and "sustainable" are not currently defined and recommended their inclusion within the glossary. Highworth Town Council similarly sought clarification of the term "sub-area analysis", suggesting that it should be defined to improve understanding and consistency in interpretation. In addition, one respondent recommended that the glossary include a

definition of "sustainable transport" to provide greater clarity regarding the policy expectations and objectives associated with transport and movement.

How the main issues were taken into account:

We recognise the request from the Build a Greener Swindon Committee for 'sustainability' and 'sustainable' to be defined within the glossary and acknowledge the suggestion that 'sustainable transport' should also be included. We also acknowledge Highworth Town Council's request for clarification of the term 'sub-area analysis.' These representations have been considered as part of a review to the Glossary and informed our approach in seeking to provide relevant and appropriate specific detail without risking duplication, over-explanation, or further ambiguity. In response to the request for greater clarity around 'sustainability,' a definition of this term has been incorporated. This provides a clear, overarching understanding of the term which can be applied to the different contexts in which sustainability is considered throughout the Plan. Definitions of 'sustainable transport modes' and 'sustainable development areas' have also been added, in alignment with their separate definition in the NPPF (2026). We further recognise the request for 'sub-area analysis' to be defined and acknowledge that the term is used in relation to the assessment of local housing need. Following review, and in alignment with the Glossary of the NPPF (2026) standalone definition of this term has not been added, with the term's meaning and application remaining instead discernible through the relevant policies and supporting text in which it used within the Plan.

Appendix 3: Housing Trajectory

Summary of main issues raised:

Respondents raised a number of concerns regarding the housing trajectory and sources of housing supply. Several respondents noted inconsistencies between the figures presented in Appendix 3, Chapter 6, the Five-Year Housing Land Supply Statement and the Annual Monitoring Report (2024/25), and sought greater clarity regarding the sources of supply and how they contribute to overall housing delivery. Some respondents also questioned whether certain supply sources may have been double counted within the trajectory.

A number of respondents sought additional detail to improve transparency and confidence in delivery assumptions. In particular, respondents suggested that the Plan should include site-specific housing trajectories to provide a clearer understanding of when individual sites are expected to come forward and contribute towards housing supply.

Respondents also queried the assumptions underpinning future housing delivery. Some questioned the methodology used to calculate anticipated windfall permissions within the trajectory, while another respondent sought clarification on the measures

the Council intends to use to encourage developers to achieve the assumed build-out and delivery rates.

How the main issues were taken into account:

Please note, “Appendix 3: Housing Trajectory” presented in the Reg 18 Consultation Draft, has been replaced with “Table 2 Components of Housing Supply” in “Policy HC1: Housing Requirement” in the Regulation 19 Publication Version. Further detail regarding the breakdown of the trajectory is now provided in the Housing Delivery Topic Paper. This was to improve the structure and clarity of the Plan.

The Council reviewed the housing trajectory and associated evidence to ensure consistency between the Regulation 19 Local Plan, Housing Delivery Topic Paper and other published housing monitoring information. The Council is satisfied that the sources of housing supply have been correctly identified and that there is no double counting within the trajectory.

The Housing Delivery Topic Paper provides further explanation of the methodology used to prepare the housing trajectory, including the assumptions applied to different sources of supply, such as windfall development. It also includes site-specific housing trajectories to support the assessment of deliverability and developability of allocated sites. Whilst some factors influencing housing delivery are outside the Council's control, the Council will continue to monitor delivery through the Annual Monitoring Report and work proactively with developers, landowners and other stakeholders to support the timely delivery of housing sites.

Appendix 4: Monitoring Framework

Summary of main issues raised:

Respondents raised a number of concerns regarding the housing monitoring framework and the robustness of its performance indicators. One respondent questioned KPI 7, arguing that it confuses the different categories set out within Part M of the Building Regulations and would benefit from clarification.

Oxfordshire County Council suggested that the Monitoring Framework should include specific modal shift and traffic reduction indicators, enabling the effectiveness of transport policies to be monitored against sustainable travel objectives and Local Transport Plan outcomes.

NHS Property Services supported KPIs 16 and 17 but recommended a more detailed approach to monitoring community infrastructure provision. In particular, it suggested disaggregating community infrastructure monitoring into separate categories, such as health, education and leisure facilities, to provide a clearer picture of infrastructure delivery. NHS Property Services also proposed the introduction of an additional indicator to monitor the number of planning applications

accompanied by a Health Impact Assessment (HIA) and assessed by the Council. Overall, respondents sought a more comprehensive and clearly defined monitoring framework capable of measuring the delivery of transport, health and community infrastructure objectives.

How the main issues were taken into account:

The monitoring framework has been restructured to allocate a monitoring indicator to each policy. This has addressed confusion regarding the categories within Part M of the Building Regulations and ensures the appropriate standard is measured against the relevant policy. Modal shift targets have been embedded within the monitoring framework. However, traffic reduction has not been directly targeted due to challenges associated with measurement. The loss of community floorspace indicator will monitor the changes in community infrastructure, with planning applications providing the type of facility changed. An additional indicator has been included to monitor the number of applications accompanied by a Health Impact Assessment.

Appendix 5: NEV Infrastructure Prioritisation Matrix

Summary of main issues raised:

Respondents raised a number of comments regarding Appendix 5, particularly its accuracy, currency and usefulness in supporting infrastructure planning. Several respondents, including the Bath and North East Somerset, Swindon and Wiltshire Integrated Care Board (BSW ICB), considered that the NEV Infrastructure Prioritisation Matrix is now dated, given that many of the New Eastern Villages sites already have planning permission. As a result, respondents suggested that the matrix should either be updated to reflect current circumstances or withdrawn if it no longer provides a meaningful basis for prioritising infrastructure delivery.

National Highways recommended improving the usability and transparency of the matrix by including an additional column setting out the current status of each infrastructure scheme. In particular, it suggested identifying which infrastructure elements have already been delivered, are under construction or remain outstanding, to provide a clearer understanding of progress and future infrastructure requirements. Overall, respondents sought a more up-to-date and transparent infrastructure prioritisation framework that accurately reflects the current stage of development and infrastructure delivery across the New Eastern Villages.

How the main issues were taken into account:

Following consideration of the representations received, the Council concluded that the inclusion of the NEV Infrastructure Prioritisation Matrix within the Local Plan was no longer necessary. The Matrix has therefore been removed from the Regulation 19

Plan to ensure consistency between the Local Plan, the Infrastructure Delivery Plan and the NEV Planning Obligations SPD, and to avoid the potential for conflicting or duplicated information across the Council's planning policy framework.

The removal of the Matrix does not alter the mechanisms through which infrastructure will be secured and delivered. The NEV Planning Obligations SPD remains in force and will continue to be a material consideration in the determination of planning applications.

The Council has continued to work with infrastructure providers and statutory stakeholders, including BSWICB and National Highways, in the preparation of the latest Infrastructure Delivery Plan and Transport Impact Assessment, which provide the most current evidence to support the emerging Local Plan.

Main issues relating to supporting documents and other topics

Policies Map

Summary of main issues raised:

Respondents raised concerns regarding the clarity and usability of the draft Policies Map, with some commenting that it is difficult to interpret and does not always align with other parts of the Local Plan. In particular, respondents identified inconsistencies between the draft Policies Map, the key diagram, policy wording and inset maps, and sought greater consistency and clarity across these documents.

A number of comments related to settlement boundaries. Highworth Town Council noted that the settlement boundary shown for Highworth does not reflect the adopted Highworth Neighbourhood Plan, while other respondents highlighted the absence of a defined settlement boundary for Hannington. Respondents therefore sought amendments to ensure settlement boundaries are accurate, up to date and consistent with other planning documents.

Several respondents also raised concerns regarding the depiction of the Wilts and Berks Canal, stating that the draft Policies Map incorrectly identifies the proposed canal alignment and should be amended to reflect the latest route proposals. Overall, respondents sought improvements to the clarity, accuracy and consistency of the draft Policies Map and its relationship with the wider Plan.

Provide your feedback on BizChat

How the main issues were taken into account:

The Regulation 19 Publicity documents now include a policies map, a key diagram and individual site plans for clarity.

A settlement boundary review has taken place and boundaries updated accordingly, including a boundary for Hannington.

An updated alignment for the Wilts and Berks canal has been sought and implemented.

Sustainability Appraisal

Summary of main issues raised:

Respondents raised concerns regarding the evidence base underpinning the Sustainability Appraisal (SA) and, in particular, whether it provides sufficient justification for not considering a housing requirement above that derived from the standard method. Several respondents argued that the appraisal should more fully assess alternatives involving higher levels of housing growth.

Respondents also suggested that the SA should consider a wider range of reasonable alternatives for the distribution of development, including additional growth at settlements such as Wroughton and Highworth, to ensure that alternative spatial strategies have been adequately explored and assessed. Overall, respondents sought a broader assessment of growth options and clearer justification for the preferred approach taken in the Plan.

How the main issues were taken into account:

Viability Report

Summary of main issues raised:

Respondents raised concerns regarding whether the Viability Report has adequately assessed the cumulative impact of a number of proposed policy requirements. In particular, respondents questioned the treatment of specialist housing for older people, compliance with Optional Technical Standards M4(2) and M4(3), Nationally Described Space Standards, increased Social Rent provision, carbon reduction measures and enhanced water efficiency standards. Respondents considered that further evidence may be required to demonstrate that these requirements are deliverable without adversely affecting development viability.

Bath and North East Somerset, Swindon and Wiltshire Integrated Care Board (BSW ICB) also suggested that the Viability Report should take healthcare infrastructure costs into account within relevant development typologies to ensure that the financial implications of supporting healthcare provision are appropriately reflected in viability assumptions. Overall, respondents sought greater assurance that the full range of policy requirements has been comprehensively tested and that development remains viable while delivering the Plan's objectives.

How the main issues were taken into account:

The Whole Plan Viability Assessment has been updated to reflect the Regulation 19 Publication Version of the Swindon Local Plan 2043. Methodological comments were shared with the consultants, HDH Planning and Development, for consideration in the updated report. The Whole Plan Viability Assessment has considered strategic infrastructure costs as part of strategic site assessments. Overall, the updated Whole Plan Viability Assessment is considered to be a PPG compliant study and accurately reflect development costs.

Duty to Cooperate

Summary of main issues raised:

Several respondents raised concerns regarding the extent to which the Local Plan and supporting evidence demonstrate compliance with the Duty to Cooperate, noting the absence of explicit references to unmet housing needs and cross-boundary matters within the Plan and supporting documents. Respondents suggested that greater clarity is required on how strategic housing and development issues have been addressed in collaboration with neighbouring authorities.

Cotswold District Council advised that it is likely to seek assistance from neighbouring authorities in accommodating future unmet housing needs, highlighting the importance of continued cross-boundary cooperation and engagement on strategic housing matters. Overall, respondents sought stronger evidence of ongoing collaboration and a clearer explanation of how unmet needs and wider strategic issues have been considered through the plan-making process.

How the main issues were taken into account:

On 25 March 2026, the Town and Country Planning (Local Planning) (England) Regulations 2026 came into force. These Regulations removed Section 33A of the Planning and Compulsory Purchase Act 2004, which established the Duty to Cooperate. As a result, the statutory Duty to Cooperate no longer applies, including plans being prepared under the legacy plan-making system.

Consequently, the Local Plan has not been amended to include specific references to the former Duty to Cooperate. However, national policy continues to require effective engagement on cross-boundary strategic planning matters. Paragraphs 24 to 28 of the National Planning Policy Framework (2024) require plan-making authorities to work collaboratively where issues extend beyond administrative boundaries, including matters relating to strategic infrastructure, development allocations and designations with cross-boundary implications, and the consideration of unmet development needs arising from neighbouring authorities. In preparing the Local Plan, Swindon Borough Council has maintained ongoing and effective cooperation with neighbouring authorities and relevant prescribed bodies. A full

account of this engagement is provided in the Statement of Cooperation published alongside the Regulation 19 Plan.

With regard to comments concerning unmet housing needs, the Statement of Cooperation explains that Cotswold District Council initially made a formal request for assistance in accommodating unmet housing need. Swindon Borough Council concluded that it was unable to accommodate this need within the Borough. Subsequent work undertaken by Cotswold District Council identified sufficient capacity to meet its housing requirement in full and, therefore, no unmet housing need remains to be addressed through neighbouring authorities.

Strategic Housing and Economic Land Availability Assessment (SHELAA) 2025

Summary of main issues raised:

Respondents raised a range of concerns regarding the Strategic Housing and Economic Land Availability Assessment (SHELAA) site identification process and assessment methodology. A key issue raised was whether sufficient consideration had been given to brownfield development opportunities. One respondent questioned whether all potential sources of brownfield land had been adequately investigated, including underutilised industrial estates, vacant commercial premises and other derelict sites, expressing concern that an underestimation of brownfield capacity could result in a greater reliance on greenfield allocations.

Several respondents also questioned elements of the SHELAA methodology. Concerns were raised regarding the exclusion of sites located outside the Borough boundary from further assessment, the way access constraints had been considered, and the approach taken to assessing locational sustainability. In particular, respondents queried the use of settlement boundaries as part of the assessment process, arguing that sites adjoining existing settlements, including Wanborough, may represent logical and sustainable extensions to built-up areas. Others disagreed with conclusions regarding accessibility to services and facilities, including assessments of walking distances and access to public transport.

A number of respondents challenged the assessment of site-specific constraints. Comments questioned the heritage Red-Amber-Green (RAG) assessments, particularly where sites were identified as giving rise to "significant concerns" that contributed to their exclusion from further consideration. Respondents also sought revisions to ecological assessments where more recent survey evidence indicated a lower level of ecological constraint, and challenged landscape RAG assessments affecting sites in locations including Broad Blunsdon and around the Castle Hill Fort Scheduled Monument.

Overall, respondents sought greater transparency and justification regarding the identification of development opportunities, the assessment of site suitability, and the methodology used to evaluate constraints relating to access, location, heritage, ecology and landscape impacts.

How the main issues were taken into account:

The concern relating to identifying brownfield site opportunities is acknowledged. However, a proactive approach was taken to identify brownfield opportunities to include within the SHELAA. Officer-led studies found over 1,000 potential sites. Those that were known to be available were included within the SHELAA. Other sources of brownfield land were also identified through Evidence documents such as the Employment Land Review. Landowners were also contacted where significant underutilised parcels were found which resulted in those areas being submitted into the SHELAA for assessment.

Initial survey: It is typical to set the area of assessment in line with the planning area.

Access: All sites have been screened for access constraints and, where taken forward as a proposed allocation, have been assessed in more detail for access scope prior to being allocated.

Location: Amongst other things, locational sustainability is informed by access to facilities and services and a sites relationship to existing built-up areas. From a spatial strategy point of view, sites located in walking distance to a range of facilities and services, along key transport corridors and within higher tier settlements naturally perform better.

Heritage: The methodology has been updated with all distinction between amber and red now being determined within a Heritage Impact Assessment outside of the SHELAA process.

Ecology: Where updated site information has been provided this has been considered and the assessment amended.

Landscape: The methodology continues to grade impact between green and red. The methodology also continues to not treat a red score for impact as grounds for considering the site 'not suitable' in and of itself.

Other

Summary of main issues raised:

Respondents raised a range of comments on the overall structure, presentation and drafting of the Local Plan. Some respondents expressed concerns regarding the consultation process, suggesting that the Plan's length made it difficult for stakeholders to engage meaningfully with the document and that the Regulation 18 consultation had not been sufficiently publicised.

A number of respondents highlighted issues relating to consistency and clarity throughout the Plan. These included concerns about inconsistent terminology between policies, typographical and formatting errors, and a lack of clarity in the identification of strategic policies. Respondents also suggested that policy wording should be strengthened, noting that the frequent use of terms such as "should" could result in ambiguity and weaken the effectiveness of policies in decision-making.

Respondents further raised concerns regarding the Plan period, arguing that the proposed timeframe may not provide the required 15-year period from adoption if delays occur to the timetable set out in the Local Development Scheme. As a result, some respondents suggested that the Plan period should be extended to ensure continued compliance with national policy requirements.

Overall, respondents sought a clearer, more concise and internally consistent Plan, supported by stronger policy wording, clearer identification of strategic policies, and greater certainty regarding the duration of the Plan period and the effectiveness of the consultation process.

How the main issues were taken into account:

The Council's approach to consultation is set out in Section 2 of this Statement, including the range of methods used to publicise the Regulation 18 consultation and enable participation. The Regulation 19 Plan has also been restructured to improve readability, with greater consistency in terminology, formatting and the use of plain English.

Policy wording has been reviewed against the supporting evidence, including viability evidence, and strengthened where this can be robustly justified. The Plan's strategic policies have also been reviewed. The Regulation 18 strategic policies, which largely summarised individual chapters, have been replaced with policies that more clearly address strategic matters. Appendix 1 of the Regulation 19 Plan now identifies which policies are strategic and non-strategic.

The Plan period has been updated from 2023–2043 to 2025–2043. Based on the anticipated examination timetable and an expected adoption date of 1 April 2028, this provides a 15-year period from adoption.

IDP

Summary of main issues raised:

Respondents raised significant concerns regarding whether the Infrastructure Delivery Plan (IDP) identifies sufficient infrastructure to support the scale of growth proposed in the Local Plan. Comments highlighted perceived gaps in transport, healthcare, education, community, recreation, highway, water and drainage infrastructure provision, with particular concerns raised regarding the ability of

infrastructure serving Wroughton, Highworth and rural communities to accommodate future development.

A recurring theme was the relationship between infrastructure delivery and housing growth. Many respondents considered that infrastructure provision has not kept pace with development in recent years and argued that stronger delivery, funding and phasing mechanisms are required. Respondents called for closer alignment between planning obligations and infrastructure delivery to ensure that necessary infrastructure is provided in advance of, or alongside, new development rather than after it has been occupied. Transport infrastructure was a major area of concern. Respondents questioned whether sufficient provision is made for highway improvements, junction upgrades, public transport infrastructure and bus service enhancements, and raised concerns regarding the cumulative impacts of growth on both local roads and the wider strategic transport network. Stagecoach West and Swindon's Bus Company supported the proposed site allocations but identified opportunities to improve bus infrastructure, bus priority measures and network connectivity, including enhanced links to the Great Western Hospital.

Several respondents also sought stronger evidence regarding infrastructure requirements, costs and delivery. The School Place Planning Team provided updated information relating to pupil yield assumptions, school infrastructure costs and the need for improved coordination between school place planning and post-16 education provision. More generally, respondents called for clearer evidence on infrastructure capacity, funding requirements and delivery mechanisms.

Oxfordshire County Council, National Highways and Wiltshire Council were broadly supportive of the IDP but recommended a stronger approach to cross-boundary collaboration, infrastructure planning and funding arrangements. These organisations also highlighted the need to consider the cumulative effects of development across administrative boundaries and to provide greater clarity regarding responsibilities for infrastructure delivery.

Haydon Wick Parish Council raised concerns regarding the cumulative impacts of growth around Tadpole, Kingsdown and Blunsdon, particularly in relation to traffic generation, flood risk and ecological corridors. The Parish Council emphasised the importance of early investment in transport infrastructure, drainage measures and green infrastructure to mitigate these impacts. Healthcare infrastructure was also highlighted as a significant issue.

The Bath and North East Somerset, Swindon and Wiltshire Integrated Care Board (BSW ICB) noted existing pressures on GP capacity and requested that future iterations of the IDP provide a more comprehensive assessment of healthcare infrastructure requirements, including capacity constraints, costs and delivery mechanisms associated with planned growth.

Finally, some respondents raised concerns about the potential demolition of the Wyvern Theatre and the uncertainty surrounding the replacement or relocation of associated cultural and community infrastructure. Overall, respondents supported the principle of infrastructure-led growth but sought a more comprehensive, robust and clearly evidenced Infrastructure Delivery Plan, supported by stronger delivery mechanisms, funding arrangements and cross-boundary coordination.

How the main issues were taken into account:

The Council acknowledges the concerns regarding the timely delivery of infrastructure alongside planned growth. The IDP sets out infrastructure priorities and phasing, providing a framework to identify infrastructure requirements and the appropriate timing of provision in relation to development. This will inform the consideration and negotiation of relevant planning obligations at the planning application stage, helping to ensure that infrastructure requirements are appropriately addressed in connection with development and delivered in a timely manner to support growth. The IDP will also provide a basis for monitoring infrastructure delivery and identifying where further action may be required to support the planned growth.

We recognise that several respondents raised issues regarding existing issue of insufficient educational, transport, healthcare and other infrastructures. Infrastructure Delivery plan identifies essential infrastructure to support additional growth. As part of stakeholder engagement and preparation for IDP, the existing capacity and constraints are taken into consideration to assess appropriate infrastructure needs.

We recognised that Local Plan site allocation will increase additional traffic congestions on strategic road network. The Local Plan is supported by Transport Impact Assessment which was carried out based on Strategic Transport Modelling. The modelling has tested cumulative impact of all site allocations on strategic network modelling and informed a mitigation measures as Transport impact Assessment.

Integrated Sports Assessment:

Summary of main issues raised:

Respondents raised significant concerns regarding the provision, quality and long-term future of indoor leisure and sports facilities within the Borough. A recurring theme was the need to retain and enhance existing strategic leisure assets, with several respondents arguing that the Action Plan should prioritise the retention of the Oasis Leisure Centre, including its indoor hall and associated facilities, as well as Abbey Stadium.

Respondents were concerned that the loss of key facilities could further reduce leisure capacity unless suitable replacement provision is secured. Several respondents considered that the Action Plan does not provide sufficient indoor

leisure and sports hall provision to meet current and future needs arising from planned growth. Respondents argued that where important facilities are lost, replacement or reallocated provision should be identified to ensure continued access to sports and recreation opportunities.

Swindon Shock Basketball Club highlighted significant growth in basketball participation and demand for indoor court space across Swindon, but noted an increasing shortage of suitable facilities. The Club explained that it currently operates across three school sites due to limited court availability, high hire costs and scheduling constraints, creating pressure on volunteers and restricting opportunities for young people to participate, particularly within more deprived communities. Whilst membership has grown substantially since 2022, the Club stated that future expansion is constrained by the lack of appropriate facilities. As a result, it strongly supported the delivery of a new centrally located multi-court sports hall, particularly as part of proposals for the Oasis Leisure Centre, and expressed a willingness to work with the Council to increase basketball participation across the Borough.

South Swindon Parish Council also challenged the evidence base underpinning indoor sports provision, arguing that it does not accurately reflect the availability and accessibility of facilities in South Swindon. Particular concerns were raised regarding the availability of facilities at Croft Sports Centre, New College Swindon and St Joseph's Sports Hall, with the Parish Council contending that existing provision is insufficient to meet local needs and that reliance on school facilities to address identified shortfalls is unrealistic.

In addition, one respondent expressed concern that the Action Plan focuses primarily on future provision without adequately addressing the poor quality and condition of some existing leisure infrastructure. The respondent argued that a number of facilities expected to accommodate future growth are already below standard and not fit for purpose, and that greater emphasis should therefore be placed on improving and modernising existing leisure assets alongside the delivery of new provision.

How the main issues were taken into account:

The Council recognises the concerns raised regarding the availability, capacity, accessibility and quality of existing sports and leisure facilities, including sports halls and facilities at Oasis Leisure Centre and Abbey Stadium. The Council has considered these representations alongside the findings of the updated sports and leisure evidence base and the identified needs arising from planned growth. The evidence and Action Plan have been reviewed to ensure that identified deficiencies and future requirements are appropriately reflected, including the need for additional and improved sports hall provision. Opportunities to retain, improve or provide new facilities will continue to be considered through the Local Plan and relevant evidence bases.