

Sustainability Appraisal (SA) of the Swindon Borough Local Plan 2043

SA Report (Draft)

September 2026

Quality information

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1. Introduction

1.1. Background

- 1.1.1. AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Swindon Local Plan, which is being prepared by Swindon Borough Council.
- 1.1.2. Once adopted, the Plan will set the strategy for growth and change for the Borough up to 2043, allocate sites to deliver the strategy and establish policies against which planning applications will be determined.
- 1.1.3. SA is a process for considering and communicating the effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives.¹

1.2. SA explained

- 1.2.1. It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004.
- 1.2.2. In-line with the Regulations, a report (known as the **SA Report**) must be published for consultation alongside the draft plan that appraises “the plan and reasonable alternatives”. The aim of the report is to inform consultation and then plan finalisation.
- 1.2.3. More specifically, the SA Report must answer the following **three questions**:²
 - What has Plan-making / SA involved up to this point?
 - including appraisal of ‘reasonable alternatives’
 - What are the SA findings at this stage?
 - i.e. in relation to the draft plan
 - What are next steps?

1.3. This SA Report

- 1.3.1. The final draft (‘proposed submission’) version of the Local Plan is currently published under Regulation 19 of the Local Planning Regulations (2012) and the Regulations set out that the SA Report should be published alongside. This SA Report supersedes the Interim SA Report published as part of a Regulation 18 consultation in 2025.
- 1.3.2. The aim of this report is to inform ‘representations’ on the Proposed Submission Local Plan and then plan finalisation (see discussion of ‘next steps’).
- 1.3.3. A final point to note is that this report integrates **Equality Impact Assessment (EqIA)**, as discussed further in Section 3.

Structure of this report

- 1.3.4. This report is structured so as to answer each of the **three questions** introduced above in turn. Specifically, the questions are answered across three ‘parts’ of the report.
- 1.3.5. Before answering the first question there is a need to further set the scene by discussing the scope of the plan (Section 2) and the scope of the SA (Section 3).

¹ Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (NPPF, 2021). The Town and Country Planning (Local Planning) Regulations 2012 require that an SA Report is published for consultation alongside the ‘Proposed Submission’ plan document.

² See **Appendix I** for further explanation of the regulatory basis for presenting certain information within the SA Report.

2. The plan scope

2.1. Introduction

- 2.1.1. The aim here is to briefly introduce the context to plan preparation, the plan area in brief terms); the plan period; and the objectives that are in place to guide plan preparation.

2.2. Context to plan preparation

- 2.2.1. Plan-making has been underway for a number of years, and with considerable urgency because the adopted Local Plan dates from 2016 and looks ahead only to 2026, whilst the NPPF expects plans to be reviewed every five years and look ahead 15 years, including in terms of identifying a supply of land sufficient to meet development needs.
- 2.2.2. There is also considerable urgency to adopt a new Local Plan with a view to ensuring that the Council is able to demonstrate and maintain a five year housing land supply (5YHLS), i.e. a rolling supply of demonstrably 'deliverable' sites with a total capacity sufficient to provide for the annual housing requirement (discussed below) over a total of five years. An inability to demonstrate a 5YHLS means that planning applications must be determined under the 'presumption in favour of sustainable development' (NPPF paragraph 11) and this has been a major issue in Swindon over recent years. Specifically, the issue is that 'the presumption' means a 'tilted balance' in favour of granting planning permission, such that where the Council refuses an application there is a heightened risk of the application being permitted at appeal ('planning by appeal').³
- 2.2.3. There is a need for a major supply boost in order to reach a situation whereby the Council is able to demonstrate and maintain a 5YHLS and, clearly, the best way to achieve this is in a coordinated way via a new Local Plan, as opposed to approving ad hoc applications for new development in the absence of an overarching plan. A further consideration is that lessons must be learned from the shortcomings of the adopted Local Plan in terms of its identified supply performing poorly against the objective of maintaining a 5YHLS / avoiding 'the presumption'. Furthermore, this is all in the context of the NPPF being clear that: *"The planning system should be genuinely plan-led."*
- 2.2.4. To summarise the discussion so far, there is: A) 'top down' pressure to adopt a Local Plan given the expectations of the Government, as set out in the NPPF;⁴ and B) 'bottom up' pressure in the sense of a need to ensure that growth comes forward in a plan-led way, i.e. such that the Borough can avoid potentially problematic 'planning by appeal'.
- 2.2.5. Finally, and on a more positive note, there is a need to adopt a Local Plan that delivers on wide-ranging objectives regardless of the 'pressures' discussed above, for example:
- Providing for housing need is not only of great importance in-and-of itself, but also due to wide-ranging secondary benefits, e.g. affordable housing and the economy.
 - Plan-led housing growth creates an opportunity to target infrastructure investment to realise benefits far in excess of what would otherwise be the case.
 - Equally, coordinated growth can deliver on place-making and regeneration objectives and, in practice, coordinated growth to deliver town centre regeneration is a key aim.
 - A local plan is an opportunity to consider development viability in a strategic way, such that a strategically targeted approach can be taken to policy 'asks' including infrastructure, housing mix, affordable housing, net zero development and more.
 - The Local Plan is a key opportunity to ensure a strategic approach in respect of a range of other key issues, including providing for employment land needs.

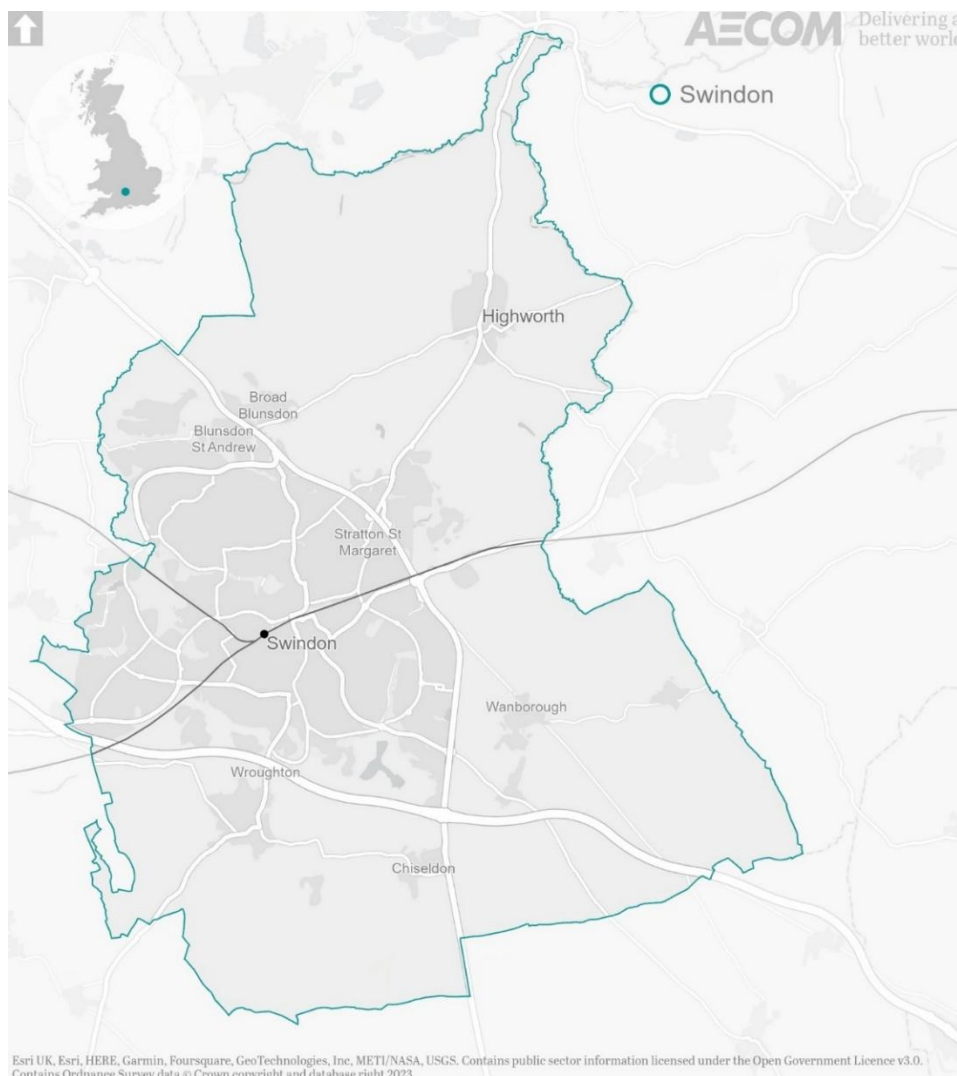
³ There is also a need to annually pass the Government's Housing Delivery Test (HDT), which is a test of whether the housing requirement has been delivered over the three most recent years. Essentially there is a need for a robust supply, as measured against the requirement, sufficient to pass both the HDT, which looks back, and the 5YHLS test, which looks forward. Finally, there is a need to note that the rules in respect of when 'the presumption' applies have recently changed under the 2026 NPPF.

⁴ There is also an urgency because the Government has set a deadline of 31st December to submit local plans for examination in public, where missing the deadline means having to restart plan-making under the new plan-making regulations.

2.3. The plan area

- 2.3.1. Swindon Borough is a unitary authority located at the northeast extent of the ceremonial county of Wiltshire, with the remainder of the county comprising Wiltshire unitary authority. To the west of the Borough is the Wiltshire town of Royal Wootton Bassett and rural north Wiltshire, with the M4 motorway and train lines passing through this area linking to Chippenham, Bath and Bristol. The north of the Borough is defined by the River Thames floodplain, beyond which is the southern part of Cotswold District and then the Cotswolds National Landscape. To the east is Vale of White Horse District, which is mainly a rural area but through which passes the A420 to Oxford and the train line to Didcot (which is the change for Oxford, although a two-hourly direct service to Oxford now runs as of 2026). To the southeast is then the rural landscape of the North Wessex Downs National Landscape, through which passes the M4 linking to Reading.
- 2.3.2. The Swindon urban area dominates the central southern part of the Borough, particularly once account is taken of a committed strategic growth area to the east (New Eastern Villages, NEV) and extensive flood zones (the River Cole). To the south is the National Landscape (NL), with a series of historic villages at the foot of the downs (scarp slope), as is a characteristic feature of the wider Vale of White Horse. Of these villages Wroughton is the largest, followed by Wanborough and then several smaller villages (Chiseldon is different as it is located on high ground within the NL). At the north-east edge of the urban area is a key industrial area, and then at the northern edge are the two 'Blunsdons', where there is extensive recent and committed growth. Finally, Highworth is a market town associated with the raised ground of the Mid Vale Ridge.

Figure 2.1: Overview of the Borough



- 2.3.3. Focusing on the main urban area (i.e. the town, which has a population of ~235,000, making it one of the largest towns in England), the first point to make is that Swindon has long been a key hub of economic activity in the national context. Swindon is strategically located at the watershed between the Thames Valley to the east, linking to the Oxford growth corridor including 'Science Vale', and the Avon Valley to the west, linking to Bristol and Bath at the heart of the 'Western Gateway',⁵ plus Swindon has linked to Reading and London via the M4 since the latter 20th Century. The scale of Swindon's growth has been unprecedented at times, namely in the 19th Century as it grew from a hilltop market town to the nation's 'Railway Town' (the Old Town and New Town fused in 1900), and then in the 20th Century as the town expanded greatly alongside industry, most notably car manufacturing at Honda from 1985, and major office hubs developed in the town centre and elsewhere along new road corridors. Today the town centre faces significant challenges (discussed below), but overall the town remains a major piece in the puzzle of national economic growth, not least because of its potential to link to and complement the Oxford to Cambridge Arc.
- 2.3.4. Within the urban area the town centre is a major focus of the current Local Plan, with the clear aim being to implement and build upon the Heart of Swindon Vision published in March 2025. Swindon has repeatedly reinvented itself, and the next phases of the town's future are heavily tied to a regenerated and prosperous town centre. This is a focus of detailed discussion below, but a key initial point to note here is the proposal for a "tactical iterative approach" that recognises a need to build investor confidence and momentum over time (whilst still at pace) rather than setting ambitions that risk going undelivered and cumulatively undermining the overall strategy. This is of key relevance to the Heart of Swindon Vision aspiration to deliver up to 8,000 new homes in that committing to delivery through the Local Plan and then under-delivering risks the Borough facing 'the presumption' (see discussion above).

Figure 2.2: Select proposals from the Heart of Swindon Vision



- 2.3.5. Across the wider urban area there is also a need to take a strategic approach to growth through the Local Plan in response to a range of spatial issues and opportunities. Matters are explored in detail below, but key opportunities are around directing growth, including high density development, so as to: A) deliver on a bus connectivity strategy; B) enhance Swindon's already extensive network of strategic walking and cycling links, linking closely to the green and blue infrastructure corridors that permeate through the urban area; C) regenerate and enhance existing local centres and neighbourhood hubs; D) ensure good access to community infrastructure including schools and health facilities; and E) support a targeted approach to renewal and potentially redevelopment of existing industrial, commercial and office areas. A transport and accessibility 'vision' is at the very heart of this, and, in this regard, the Local Plan is being prepared in the context of Swindon's Local Transport Plan 4 (2022), a Local Cycling and Walking Infrastructure Plan (2022) and the emerging Swindon Borough Transport Strategy.

⁵ The Western Gateway was the pan-regional partnership for South Wales and Western England until early 2025.

2.3.6. Moving to the urban edge, this is a key focus of discussion below, as part of work to explore growth options/scenarios, but by way of initial orientation:

- North – new communities have been delivered alongside strategic infrastructure over recent years and decades, most recently Tadpole Garden Village, which delivered at pace following construction starting in 2014, and which has delivered infrastructure including a secondary school. Further growth in this area is an option, but aligning with the aforementioned vision-led transport strategy is a challenge, plus this area comprises land between the Mid Vale Ridge to the east and the River Ray to the west.
- North east – Broad Blunsdon has seen significant piecemeal expansion over recent years and there is an ongoing risk of further uncoordinated growth of this nature. To the south is then Kingsdown, which is a strategic allocation in the adopted Local Plan and now has outline planning permission for over 1,500 homes and a new local centre.
- East – to the north of the A420 is the village of South Marston and the town's main industrial area including the former Honda works now being redeveloped as Panattoni Park. To the south of South Marston, stretching south well-beyond the A420 to the southeast edge of Swindon (north of Wanborough), is New Eastern Villages (NEV), which was allocated in the adopted Local Plan to deliver 8,875 homes by 2026 but which has faced major delivery challenges, and to date has delivered only around 260 homes, although a new strategic link road is nearing completion.
- South east – this area is associated with Junction 15 of the M4, the villages of Wanborough and Chisledon and extensive constraint in the form of the NL (with land outside the NL highly visible from the Ridgeway National Trail). The Great Western Hospital is close to the M4 junction, and stretching north from the junction is the aforementioned new road link to NEV. To the west of the hospital a new community is near complete comprising around 900 homes alongside infrastructure including a primary school and some employment land, following permission granted at appeal in 2011 (which followed a dismissed appeal for 1,550 homes plus a university campus).
- South – the east of this sector is associated with green / blue infrastructure including Coate Water Country Park and a golf course, and there is limited growth opportunity (at least greenfield). To the west is then the Wichelstowe adopted strategic allocation, which is coming forward in phases (East, Middle and West Wichel) with construction having commenced at East Wichel in 2007, and around 2,500 homes expected in the current plan period including to deliver a further 3fe primary school.
- West – the western edge of the urban area is mostly defined by the boundary with Wiltshire and, whilst due consideration must be given to possible cross-border growth, in practice this is a challenging direction for growth including because of issues around transport connectivity, capacity at M4 J16, settlement gaps and the River Ray corridor.

2.3.7. The *adopted* Local Plan key diagram is shown below, showing strategic allocations that have now delivered (1 and 4), are delivering (3 and 5) and are set to deliver (2).

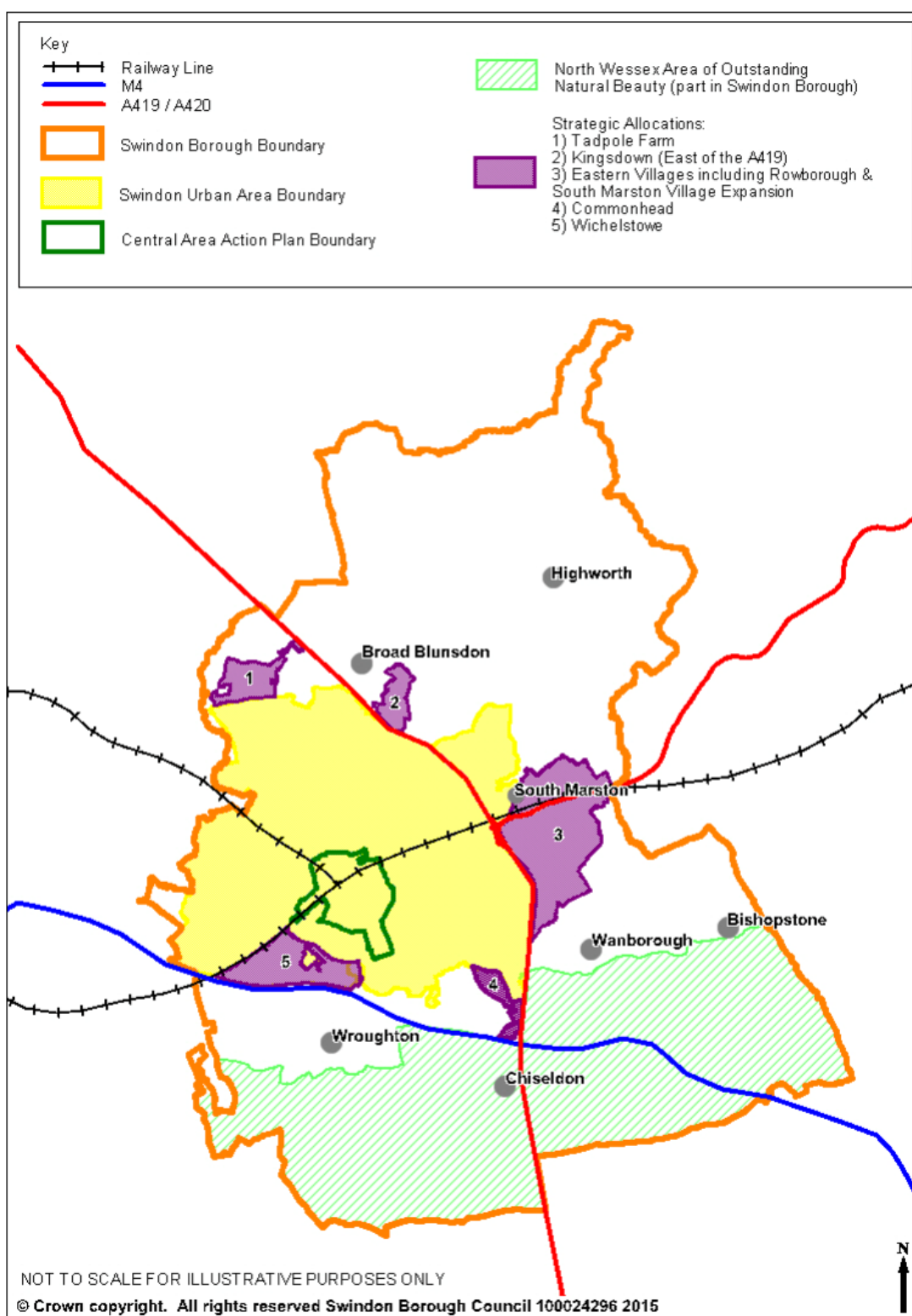
2.3.8. One point to note from Figure 2.3 is that within the 'white land' north of Swindon to the east of Tadpole Garden Village (1) the urban edge has now expanded through the Abbey Farm site for 350 homes (with a primary school) permitted in 2015 in light of 5YLHS challenges and, furthermore, there is now a pending planning application for a 410 home extension. This highlights the need for a long term strategic approach, with comprehensive growth that avoids issues and maximises benefits ('planning gain').

2.3.9. Finally, with regards to orientation across the wider Borough beyond the urban area:

- The North Wessex Downs NL – is shown below and has been discussed above. At the foot of the Downs, Wroughton is a potential strategic growth location discussed below, and there is also an important sector of land between Wroughton and M4 J16.
- East – the relationship between the Mid Vale Ridge and the Vale of White Horse / Thames Valley (either side of the ridge) is a characteristic feature. North-east of the urban area there is an important rolling wooded landscape stretching to Highworth and then on to Faringdon in Oxfordshire; both characteristic towns of the Ridge.

- North – this area is close to the confluence of the River Ray with the River Thames, and just upstream of here is the town of Cricklade (Wiltshire) and internationally designated Cricklade North Meadow, where A419 air pollution is an issue.

Figure 2.3: The adopted Local Plan Key Diagram (2015)



2.4. The plan period

- 2.4.1. The plan period is 2025 to 2043, in light of NPPF paragraph 22 which states:

“Local plans] should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead...”

- 2.4.2. With regards to the start of the plan period ('base date'), whilst the previous proposal was a 2023 base date, it is now established good practice for the base date to be as close as possible to the point of plan finalisation / submission. Indeed, on this basis there is the possibility of further rebasing the plan period to 2026.⁶

- 2.4.3. With regards to the plan end date, 2043 aligns with NPPF paragraph 22 on the assumption that the Local Plan will be adopted in 2028.

Completions and commitments

- 2.4.4. Latest monitoring data (1st April 2026) shows that 676 homes were delivered in the first year of the plan period (2025/26) and that there are 11,399 homes set to come forward at sites already with planning permission or the benefit of an existing allocation (which primarily means an allocation in the Local Plan adopted in 2016). As such, a key aim for the Local Plan is to identify a supply of land to provide for development needs (discussed below) over-and-above existing 'completions' and 'commitments'.⁷ This is similarly the case in respect of employment land. With regards to existing allocations that do not yet have permission, whilst there is potential to revisit proposals for sites through the new Local Plan, there is typically limited case for removing existing allocations given that the principle of development has already been established.

2.5. Plan objectives

- 2.5.1. It is important to define plan objectives early in order to guide the plan-making process. Also, the plan objectives are a key input to the SA process, because 'reasonable alternatives' must be defined taking account of *“the objectives... of the plan.”*

- 2.5.2. To begin, the plan document presents the following statement on the plan purpose:

“Its purpose is to help Swindon grow with confidence, attract investment, provide homes for local people, protect valued places and make sure infrastructure keeps pace with development.”

- 2.5.3. The plan objectives are then as follows:

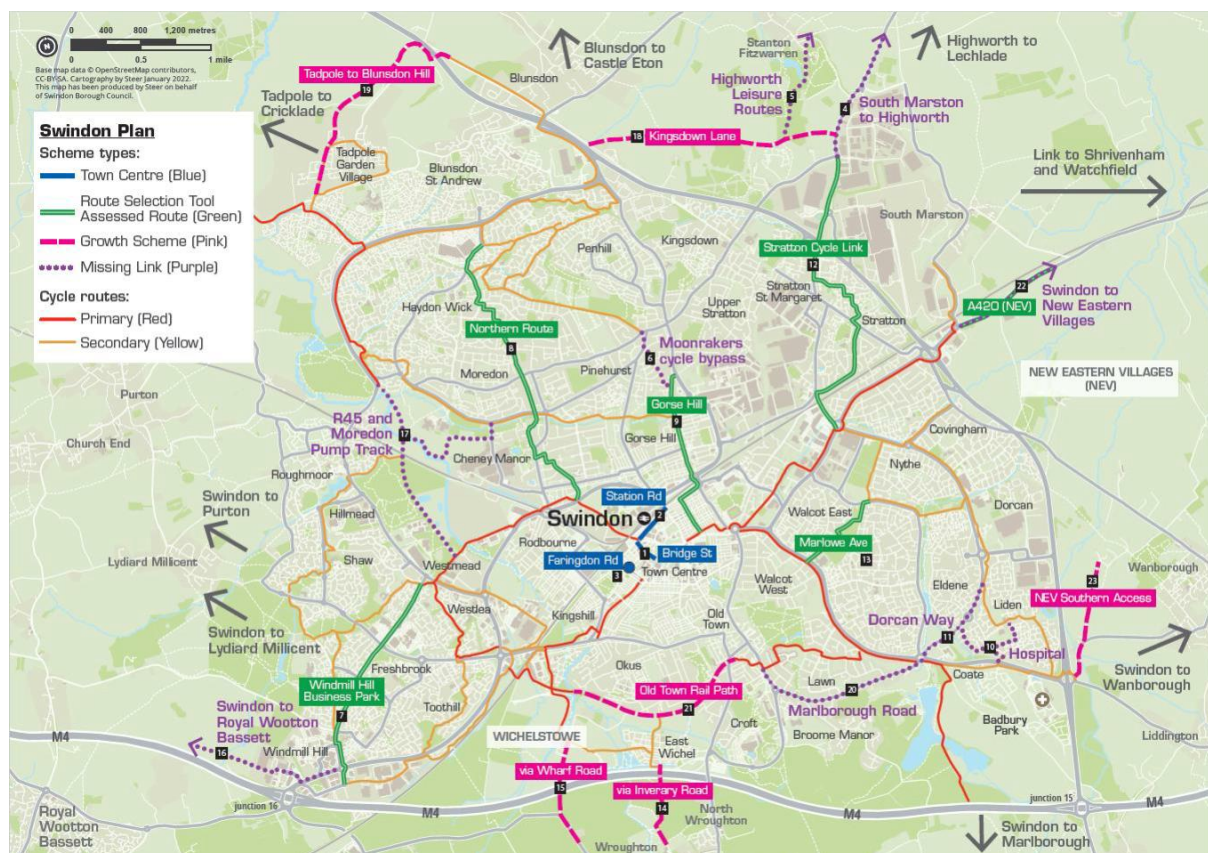
- **Regenerating Swindon Town Centre** – revitalise the Town Centre as the heart of Swindon through supporting and delivering mixed-use residential and commercial development, supported by the appropriate social and transport infrastructure.

⁶ Housing supply over the 2023/24 and 2024/25 monitoring years averaged 806 homes, which is below the Borough's annual local housing need (LHN) figure of 1,203 homes, as understood from the Government's standard method (discussed further below). As such, rebasing the plan period to 2025 makes the task of providing for LHN over the plan period slightly easier. However, this is not an issue because the standard method calculation is 'forward looking', in that it includes an upwards adjustment for affordability such that any past under-supply is captured (assuming supply affects affordability). In turn, the plan period might be further rebased to 2026, such that LHN (1,193 homes) and supply (676 homes) for the 2025/26 monitoring year falls outside of the plan period. Again, this would make the task of providing for LHN over the plan period slightly easier.

⁷ Specifically, the aim is to identify housing supply over-and-above completions and commitments (also a windfall assumption), primarily via site allocations (see NPPF para 72). More specifically, the requirement is to ensure a total supply that is robust in that there are: specific "deliverable sites" for years 1 to 5 of the plan period (such that there is a 5YHLS); "developable sites or broad locations" for years 6-10; and "where possible" developable sites or broad locations for years 11-15. As well as demonstrating a 5YHLS of deliverable sites at the point of plan adoption (N.B. the 5YHLS calculation involves adding a 5% buffer on top of the housing requirement in light of Swindon's recently published housing delivery test score of 87%) there is also a need to ensure that the Council can maintain a rolling 5YHLS over the early years of the plan period (ahead of a future supply boost through a new local plan) with a view to avoiding 'evidenced unmet need' (see Policy S5 in the new NPPF, 2026).

- **Place and belonging** – enhance Swindon’s sense of community belonging, wellbeing, and pride in place through supporting good place-making and conserving / enhancing Swindon’s history and heritage. This includes supporting the delivery of high-quality, sustainable development with the right infrastructure that will enable or improve access to key services and social / leisure opportunities.
- **Homes for all** – ensure the right types and tenures of housing are delivered to meet the needs of our current and future residents. This includes delivering affordable housing, encouraging different types of housing (including specialist housing), and making sure that new development is well-designed to meet a variety of needs.
- **Economic prosperity** – a resilient economy that maximises on Swindon’s strategic location and town centre redevelopment potential, bringing opportunities for all.
- **Connected communities and sustainable movement** – connect people, neighbourhoods and communities with efficient and sufficient sustainable transport choices, improving connectivity for all, reducing public transport times and, as a result, reducing car dependency.
- **Natural environment** – support the delivery of new and / or enhanced open spaces and green infrastructure, and ensure that new buildings are net zero carbon ready with appropriate climate mitigation and adaptation measures in place.
- **Health and Wellbeing** – develop healthy, active and inclusive communities with a holistic plan-led approach that secures good quality housing, enhanced connectivity and accessibility to key services, social and leisure infrastructure, and inclusive design.

Figure 2.4: The Local Cycling and Walking Infrastructure Strategy – one key source of evidence to inform consideration of growth options aimed at delivering a vision-led growth strategy



3. The SA scope

3.1. Introduction

- 3.1.1. The scope of the SA refers to the breadth of sustainability issues and objectives that are taken into account as part of the assessment of reasonable alternatives and the emerging plan. It does not refer to the scope of the plan (discussed above) or the scope of reasonable alternatives (discussed below, in Part 1). The aim here is to introduce the reader to the *broad scope* of the SA, rather than trying to define the scope of the SA comprehensively, recognising that there is a need for flexibility to respond to the nature of the emerging plan and reasonable alternatives, and latest evidence. The SA scope is further discussed throughout this report, i.e. throughout the report there is discussion of key aspects of the sustainability context and baseline and key issues / opportunities. This allows for a targeted discussion, and avoids the need for a generic discussion of sustainability issues (etc.) that is poorly targeted in the context of the plan/alternatives.

Consultation on the scope

- 3.1.2. The statutory consultation bodies and neighbouring local authorities were consulted on the Scoping Report in 2023 and all responses received have factored in, as have comments made through the Draft Plan / Interim SA Report consultation in 2025.

3.2. The SA framework

- 3.2.1. The key outcome of scoping work is the SA ‘framework’ under which subsequent appraisal can be undertaken, with a view to ensuring that appraisal is suitably focused. At the core of the framework is a list of sustainability objectives under topic headings.
- 3.2.2. Appendix II presents the SA framework in full, but the topics at its core are as follows:
- Accessibility
 - Air quality
 - Biodiversity
 - Communities
 - Climate change adaptation
 - Climate change mitigation
 - Communities, and health
 - Economy & employment
 - Equality
 - Historic environment
 - Housing
 - Landscape
 - Soils and resources
 - Transport
 - Water

Equality Impact Assessment

- 3.2.3. Finally, note that under the “equality” heading the appraisal aims to integrate Equality Impact Assessment (EqIA) as part of which consideration is given to the effects of the plan for groups of people with protected characteristics under the Equality Act 2010, namely age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

Part 1: Work to date

4. Introduction to Part 1

4.1. Overview

- 4.1.1. Several formal consultations having been held to date. However, the aim here is not to relay the entire backstory, nor to provide an ‘audit trail’ of steps taken.
- 4.1.2. Rather, the aim is to report work undertaken to examine **reasonable alternatives** in 2026 ahead of the current consultation. Specifically, the aim is to:
 - explain the reasons for selecting the alternatives dealt with – see **Section 5**
 - present an appraisal of the reasonable alternatives – see **Section 6**
 - explain the Council’s reasons for selecting the preferred option – see **Section 7**
- 4.1.3. This aligns with the requirement for the SA Report to present an appraisal of reasonable alternatives and “*an outline of the reasons for selecting the alternatives dealt with*”.

4.2. Reasonable alternatives in relation to what?

- 4.2.1. The requirement is to examine reasonable alternatives (RAs) taking account of “the objectives and geographical scope of the plan”, which suggests a need to focus on the **spatial strategy**, i.e. providing for a **supply** of land, including by allocating **sites**, to provide for housing needs (**LHN**) alongside delivering on wider plan objectives. Establishing a spatial strategy is invariably a central objective of any local plan.
- 4.2.2. Alternatives in respect of spatial strategy / site selection / supply can be referred to as ‘**growth scenarios**’, and can also be thought of as **alternative key diagrams**. A focus on RA ‘growth scenarios’ ensures a focus on mutually exclusive alternatives that go to the very heart of the plan and, in turn, ensures a meaningful and engaging appraisal.⁸

What about broad spatial strategy?

- 4.2.3. Broad spatial strategy feeds into the definition of growth scenarios, and so is a focus of discussion in Section 5.2. However, at this stage in the process there is no requirement to appraise broad spatial strategy alternatives because there must be a focus on alternatives that are genuinely reasonable given supply options and the evidence base.

What about individual sites?

- 4.2.4. Individual sites invariably generate a high degree of interest, but they are not RAs where the objective of a local plan is to allocate a *package* of sites to deliver in combination. Nonetheless, consideration is naturally given to the merits of individual site options as part of the process of establishing growth scenarios – see Sections 5.3 and 5.4. There is also the matter of policy for individual sites, e.g. in terms of capacity and use mix.

What about DM policies?

- 4.2.5. The plan also covers development management (DM) policies, but it is clear that spatial strategy / site selection / supply is the central matter. DM policies are appraised in Part 2 and, as part of this, informal consideration is given to the question of alternatives; however, through discussion it was determined that there are no DM policy RAs.

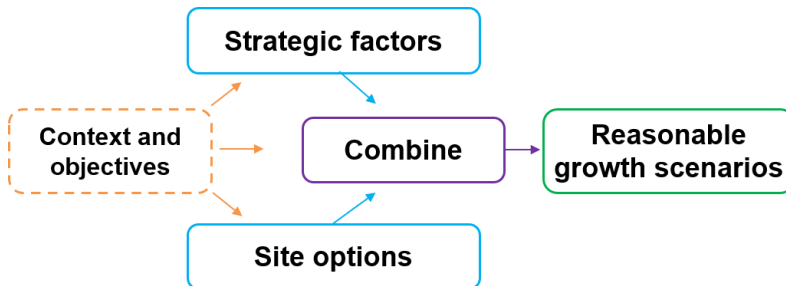
⁸ SA must only focus on significant effects, and a focus on RA growth scenarios guarantees a focus on meaningfully differential significant effects thereby negating a need to ‘screen’ all plan policy areas/issues/choices. A further consideration is that the Regulations, when read at face value, arguably require consideration of alternative plans (specifically, the requirement is to appraise and consult upon: “... *the plan and reasonable alternatives*”), which supports a focus on RA growth scenarios, i.e. alternatives that go to the very heart of the plan. Finally, in respect of RAs, it is important to note that appraising a draft proposal versus the ‘do nothing’ option does not equate to an appraisal of RAs, because ‘do nothing’ is the baseline.

5. Defining growth scenarios

5.1. Introduction

- 5.1.1. The aim here is to discuss the process that led to the definition of reasonable growth scenarios in 2026. To reiterate, growth scenarios equate to **reasonable alternatives**.

Figure 5.1: A standard broad process to define growth scenarios



- 5.1.2. This process is described across the following sub-sections:
- **Section 5.2** – considers strategic factors ('top down').
 - **Section 5.3** – considers individual site options ('bottom up').
 - **Section 5.4** – draws matters together (top down / bottom up).
 - **Section 5.5** – concludes on reasonable growth scenarios.
- 5.1.3. With regards to the **context**, the first point to make is that key context is provided by plan-making stages over recent years, and a number of consultation response received are referenced/quoted below.
- 5.1.4. Secondly, numerous 'non-SA' workstreams have fed in as far as possible, but it is inevitably the case that there are invariably challenges in terms of timings, including relating to key workstreams examining transport modelling, infrastructure requirements and associated costs, development / whole plan viability and site masterplanning. Also, there is a need to acknowledge that some of the key inputs to the local plan, including some of the aforementioned workstreams, focus on the emerging local plan only, which inevitably leads to a challenge in terms of evidencing alternatives / growth scenarios.

A note on limitations

- 5.1.5. It is important to emphasise that this section does not aim to present an appraisal of reasonable alternatives. Rather, the aim is to describe the *process* that led to the *definition* of reasonable alternatives. This amounts to a relatively early step in the plan-making process (a means to an end, i.e. alternatives for appraisal) which, in turn, has a bearing on the extent of work that is proportionate, also recalling the legal requirement, which is to present an "**outline of the reasons for selecting alternatives...**" [emphasis]

5.2. Strategic factors

Introduction

- 5.2.1. The aim of this section is to explore strategic factors (issues and options) with a bearing on the definition of growth scenarios. Specifically, this section of the report explores:
- Quantum – how much development is needed (regardless of capacity)?
 - Broad spatial strategy – broadly where is more/less suited to growth; also, what growth typologies are supported, e.g. large ('strategic') sites versus smaller sites?

Quantum

- 5.2.2. This section sets out understanding of development needs in respect of housing, employment land and Gypsy and Traveller accommodation in turn. In each case, in addition to setting out understanding of objectively assessed need (NPPF para 11), the aim is to also explore *high level* arguments for the Local Plan providing for a quantum of growth either above or below objectively assessed need.

Housing

- 5.2.3. A central tenet of local plan-making is the need to **A)** objectively establish needs ('policy-off'); and then **B)** develop a response to those needs through the local plan ('policy-on'). Planning Practice Guidance explains: *"Housing need is an unconstrained assessment of the number of homes needed in an area. Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from... establishing a housing requirement..."*
- 5.2.4. With regard to (A), the NPPF states that local housing need (LHN) should be established via an assessment "conducted using the standard method". With regard to (B), most local authorities respond to LHN by setting a housing requirement that equates precisely to LHN. However, under certain circumstances it can be appropriate to set a housing requirement that departs from LHN.
- 5.2.5. For Swindon Borough the Government's standard methodology establishes an **LHN** figure of 1,203 dwellings per annum (dpa), or 21,654 homes over the plan period.
- 5.2.6. Setting the **housing requirement** at 1,203 dpa over the plan period and identifying a supply sufficient to deliver on the requirement is challenging but achievable assuming a carefully selected strategy and associated suite of site allocations.
- 5.2.7. The adopted Local Plan had envisaged a stepped requirement, where the requirement would be set at 1,150 dpa between 2011 and 2016 and then 1,625 dpa between 2016 and 2026 and, in practice, annual housing completions with Swindon Borough have ranged between 595 homes in 2013-14 up to 1,699 homes in 2016-17. Most recently, delivery was in the region of 1,000 dpa over the years 2021/22 to 2022/23 and then lower in 2023/24 (720 homes), 2024/25 (892 homes) and 2025/26 (676 homes).
- 5.2.8. This being the case, and also given limited 'headline' constraints to growth (NPPF para 11bi) across the Borough, it is possible to rule out the possibility of a sub-LHN housing requirement. Whilst recent delivery serves to highlight that delivering LHN will be challenging, it is eminently possible with the benefit of an up-to-date local plan.
- 5.2.9. Also, a sub-LHN housing requirement would mean generating 'unmet need' that must then be provided for elsewhere (if possible) and, in reality, there is no possibility of exporting unmet need to a neighbouring local authority (see discussion below).
- 5.2.10. The final consideration here is then whether there is a high level case for remaining open to the possibility of a housing requirement set *above* LHN, as part of work to define RA growth scenarios. This is an important consideration across the south of England, as there are many sub-regions and groups of local authorities where unmet need is a very clear and pressing issue, such that centrally important to plan-making is exploring 'high growth' scenarios involving a housing requirement set above LHN in order to make some provision for unmet need; for example, this is the case for the Bristol and Oxford city-regions. For the Swindon sub-region unmet need is not a 'clear and present' issue but there are unmet need risks that must factor-in, including noting NPPF paragraph 28, which deals with effective and on-going joint working:

"Plans come forward at different times, and there may be a degree of uncertainty about the future direction... In such circumstances... authorities... will need to come to an informed decision on the basis of available information, rather than waiting for a full set of evidence from other authorities."

5.2.11. Taking Swindon's neighbouring local authorities in turn:

- **Wiltshire** – clearly relates very closely to Swindon and, indeed, it can be argued that the Swindon housing market area stretches a considerable way into Wiltshire, plus the M4 functional economic area clearly links the two authorities. A local plan was submitted in 2024 under 'transitional arrangements' meaning that its starting point was an understanding of LHN on the basis of the 2023 standard method, specifically 1,917 dpa, as opposed to the 2024 standard method figure of ~3,450 dpa. The submitted plan proposed to set the housing requirement at LHN over the plan period as a whole, but with a stepped requirement, i.e. one whereby the requirement is set below LHN in the early years of the plan and then above LHN in later years (shown [here](#)). The Inspectors then wrote to the Council in April 2025 suggesting the need to extend the plan period (to ensure a plan period extending 15 years from the point of plan adoption, and the Inspector also raised certain concerns with the identified supply. There was then further correspondence before the Inspectors wrote to the Council in February 2026 recommending withdrawal of the local plan because there was no potential to undertake the required work in respect of "a revised spatial strategy and/or new sites" as part of the examination process. The Council then withdrew the plan and has now commenced work on a new local plan under the new plan-making system, with a 'scoping' consultation currently underway (September 2026). Overall, it is clear that providing for ~3,450 homes will be very challenging, such that there is a *risk* of unmet need, and one other consideration is that Wiltshire could come under pressure to provide for unmet needs from the west and/or south. However, there is no certainty ahead of future work to explore supply options across Wiltshire and the simple fact is that there are extensive parts of the County that whilst rural / not well connected are not highly constrained NPPF para 11bi (particularly footnote 7) terms.
- **Cotswold** – a Proposed Submission Local Plan was recently published under Reg 19 and does not generate unmet need.⁹ However, the plan faces a range of challenges, including relating to a proposal to deliver 90% of homes across strategic sites that are clustered within the 20% of the District outside of the Cotswolds NL, which leads to delivery risk and a very heavily stepped housing requirement. It is difficult to suggest that any risk translates as a clear argument for making provision for unmet need through the Swindon Local Plan, but this is a consideration for growth scenarios.¹⁰
- **Vale of White Horse** – a Joint Local Plan with South Oxfordshire District was submitted in 2024 under 'transitional arrangements' meaning that its starting point is an understanding of LHN on the basis of the 2023 standard method, which is much lower than the most recent standard method figure. There is also the question of whether the joint plan should additionally make provision for unmet need from Oxford and, if so, how much. Recent delivery has been high, plus there is a need to factor-in that Swindon only links closely to Shrivenham/Watchfield and Faringdon ('Western Vale'), where constraints to growth are not particularly high.

5.2.12. There are other local authorities that could be discussed as feasible generators of unmet need that could feasibly flow towards Swindon, but it is considered appropriate to focus on the three authorities discussed above as most closely linked to the Borough.

⁹ A report to Cabinet (July 2026) explained: "Around 80% of Cotswold District falls within the Cotswolds National Landscape... On this basis, it would not be unreasonable for the Council to consider, before undertaking any work, that there may be challenges in meeting a significantly increased housing need figure in Cotswold District. However... A number of additional potential development sites were submitted to the Council during the 2025 consultation, which have been assessed along with any other sites the Council was already aware of. The assessment demonstrates that Cotswold District can meet its identified housing need, on sites that are, or can be made to be sustainable, that are relatively unconstrained and that are largely outside the National Landscape. Thus... it would not be appropriate for the Council to seek to identify unmet housing need."

¹⁰ For context, the equivalent discussion in the Interim SA Report (2025) was as follows: "Cotswold – a high level consultation held in 2021 presented a series of scenarios where Scenario 8 involved [unmet need]. This was not the preferred scenario, but it was explained: "Neighbouring authorities accommodating some unmet housing need of the District requires further assessment..." Since that time understanding of standard method LHN has increased dramatically from 504 dpa to 1,036 dpa and this is in the context of recent delivery averaging 358 dpa (2021/22-23/24). As such there is a clear risk of unmet need, but there is no certainty ahead of further work by the District Council to explore supply options. Furthermore, even if there were to be an evidenced unmet need, there would then be the separate question of whether Swindon Borough is well placed to make provision for it, including noting that links are primarily via the constrained A419 corridor."

- 5.2.13. Overall, the conclusion is that there is a *risk* of unmet need from Cotswold District that must factor-in as a consideration as part of work to define RA growth scenarios, albeit it is very difficult to say precisely how, because Cotswold District has not stated an unmet need figure that might be provided for in Swindon; indeed, the latest position of Cotswold District is that the Cotswold Local Plan will not generate unmet need.

Figure 5.2: The extent of Cotswold District covered by the National Landscape

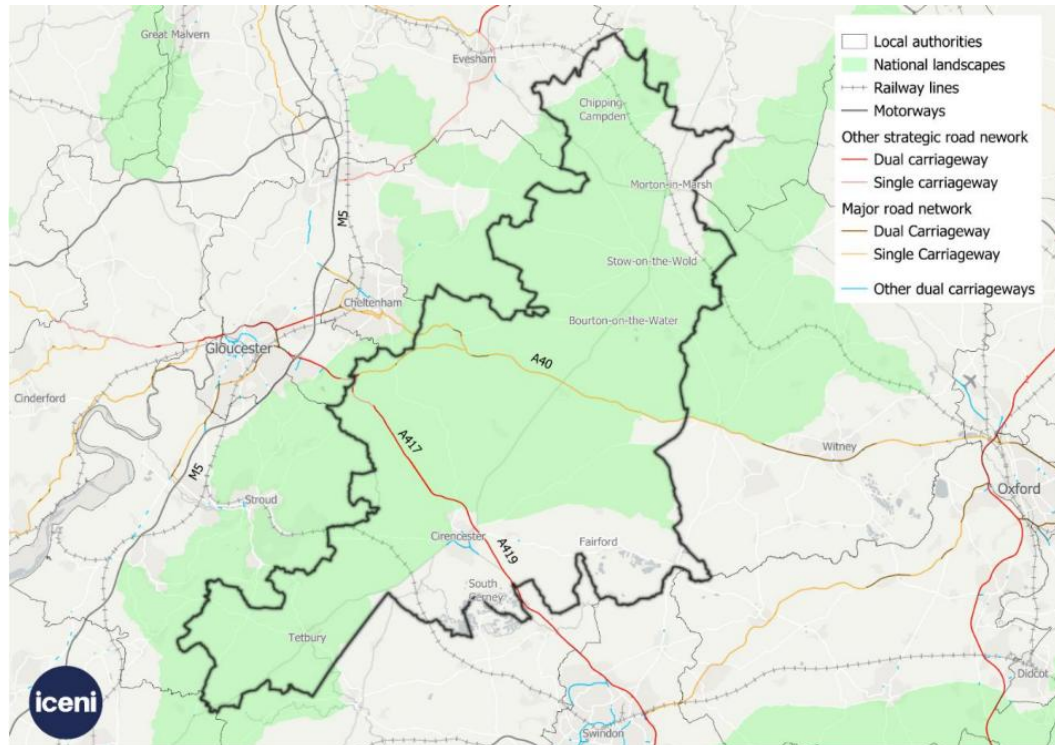
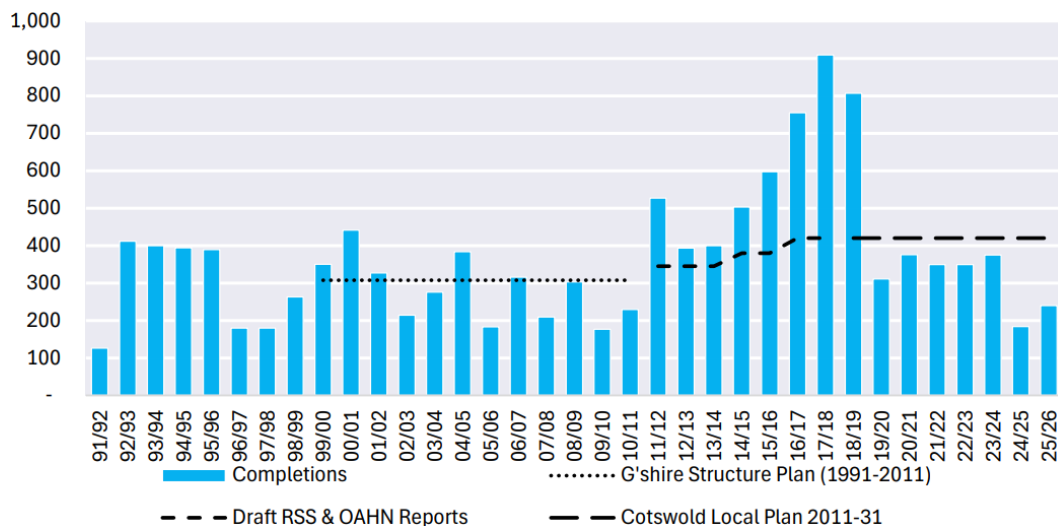


Figure 5.3: Recent housing delivery in Cotswold District (N.B. LHN is now 1,054)¹¹



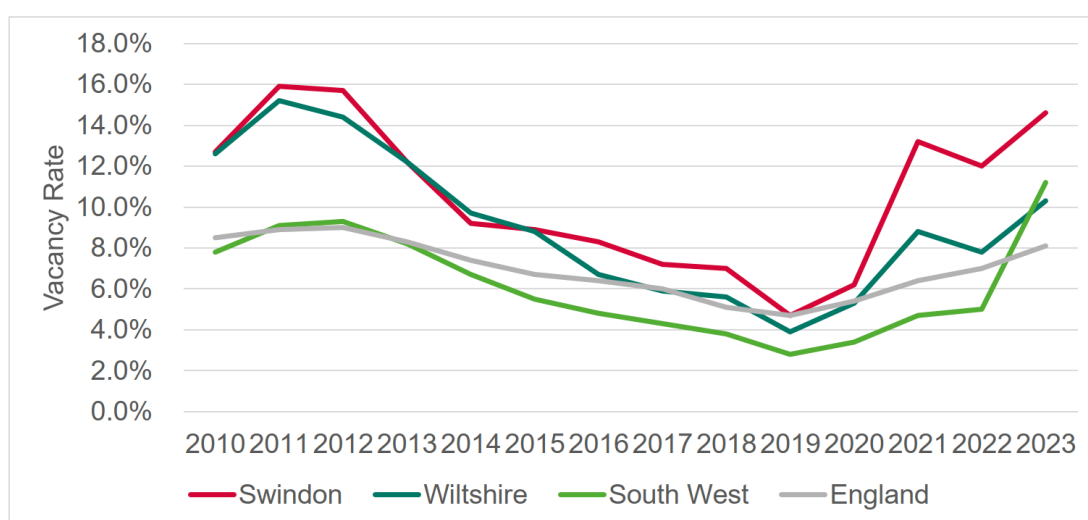
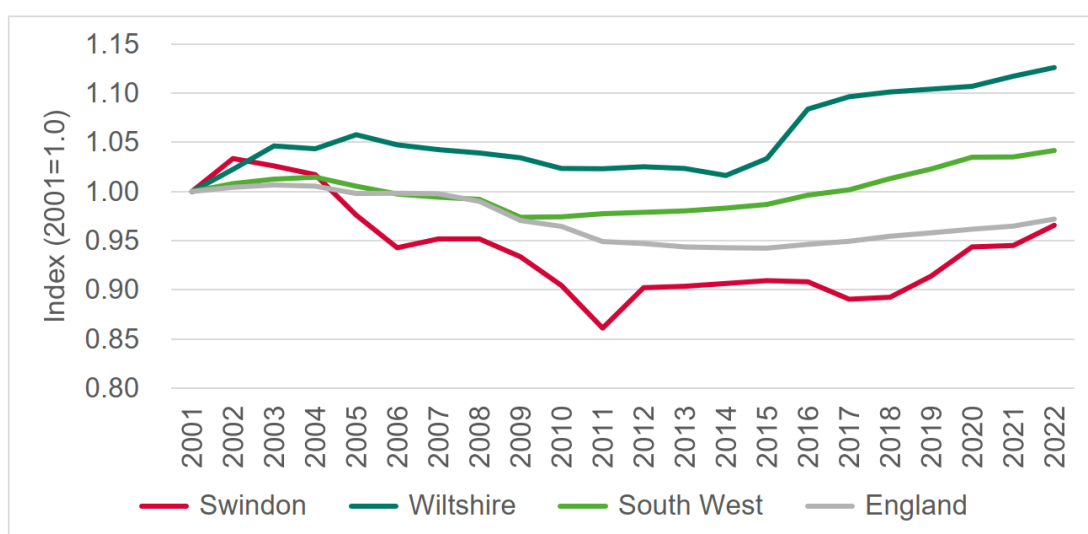
¹¹ This figure is taken from the Housing Delivery Study (ICENI, 2026), which also notably states the following regarding housing delivery proposed by the Local Plan in the south of the District: "... delivery to 2043 will need to be 174% above the historical rate, a very substantial increase... this will be quite challenging, but it is likely that future development rates well in excess of historical rates will be possible given evidence of suppression of demand and the few strategic sites which have been progressed through local planning in recent years."

- 5.2.14. Finally, beyond the matter of unmet need, there is a need to consider the possibility of setting the housing requirement above LHN on the basis of:
- Growth ambitions linked to economic development or infrastructure investment (NPPF paragraph 69) – this is a consideration for Swindon, for example in light of the discussion above at paragraph 2.3.3 and also below under the ‘employment land’ heading. For example, set out below is a discussion of the Swindon Economic Growth Plan (2026), which states: *“The vision for Swindon’s economy by 2031 is to become the most innovative, productive, and fastest-growing town in England.”* However, there is little or nothing in the way of national sub-regional strategy that serves as evidence for a housing requirement set above LHN on growth and/or infrastructure grounds. The Employment Needs and Land Supply Study (ENLSS; 2025) is a source of local evidence, but work in the ENLSS to explore employment growth scenarios does not provide clear evidence in support of a requirement set higher than LHN. Finally, with regards to infrastructure, there is an aspiration for a second train station to the east, which would clearly need to be facilitated by growth, but this is a long term aspiration given the situation with NEV, and would likely require 4-tracking to Didcot.
 - Affordable housing need – the Housing Need Assessment (HNA, 2026) identifies a need for 342 affordable homes per annum and, within this, identifies that there is a higher need for affordable home ownership products than rented affordable homes (affordable and social rent). On this basis there is the potential for affordable housing needs to be provided for in full assuming a housing requirement set at LHN (although this is dependent on spatial strategy, e.g. the extent to which there is a focus on sites with strong development viability well-placed to deliver affordable housing) and, in turn, there is very limited affordable housing case for boosting the housing requirement.
- 5.2.15. In summary, there is a clear case for focusing attention on growth scenarios involving setting the housing requirement at LHN (with a supply sufficient to provide for this over the plan period and year-on-year, particularly over the early years of the plan period, which can necessitate a ‘supply headroom’ as a contingency for delivery issues). However, given a risk of unmet need from Cotswold there is also a need to remain open to exploring higher growth scenarios, subject to consideration of supply options.

Employment land

- 5.2.16. In summary the ELNSS (2025) work through a series of steps as follows:
- Explore employment growth scenarios
 - Identify a preferred scenario (employment land ‘demand’)
 - Consider existing and committed sources of supply
 - Concludes on the “supply demand balance” to be addressed by the Local Plan, including via allocations to deliver new supply.
- 5.2.17. Paragraph 2 of the report aims to set the scene as follows (emphasis added):
- “Swindon faces challenges but also has **huge economic potential**, as the national and global economy embraces a range of new sectors around technology and the green economy. Swindon is well placed to take advantage of this with land investment opportunities and rich economic history, but continued investment in skills and regeneration including the town centre is required.”*
- 5.2.18. With regards to ‘demand’, the ELNSS settles on a net growth of 695 jobs p.a. as the preferred baseline scenario, which is the figure derived from Experian forecasts. However, the study considers a variety of scenarios that present a growth in net jobs ranging from 51 to 1,252 p.a. Within these, the ‘Labour Supply’ scenario is of note, which aims to balance the growth of jobs and homes on the assumption of homes growth in line with standard method LHN, which sees growth of 1,137 jobs p.a.

- 5.2.19. The next step is then to translate the preferred jobs growth demand figure (695 p.a.) into a demand (or 'need') figure for employment land over the plan period, with a key distinction between land for industry and offices. The conclusion is a need for 160 ha additional land for industry over the plan period and 12 ha additional land for offices.
- 5.2.20. Moving on to supply, the first step discussed in the ELNSS is to establish existing supply from sites already delivered in the plan period and with planning permission. Having done so, the residual need figure for industrial land reduces significant to 29 ha but the residual need figure for office land increases to 15 ha because of the recent and ongoing trend for office space to be redeveloped for housing and other uses.
- 5.2.21. The final step is then to identify potential 'new supply' from the intensification of existing employment sites, albeit the ELNSS must apply caution in respect of making assumptions regarding policy choices to be made through the Local Plan (e.g. certain sites might be identified through the study as having capacity onsite for intensification, but there could be implications for the surrounding area of road corridors). Overall the ELNSS identifies the potential for 40 ha new industrial land and 8 ha new office land.
- 5.2.22. The net outcome is then the 'supply / demand balance' for the Local Plan:
- Industrial land – a 10.65 ha **over-supply**, which indicates no pressure to allocate new land and flexibility to consider redevelopment of some land for alternative uses.
 - Office land – a 7.3 ha **under-supply**, such that the Local Plan must consider identifying additional supply, which primarily means through site allocations.
- 5.2.23. However, there are wide ranging caveats to this analysis, as set out in the ELNSS:
- With regards to the **office land** under-supply:
 - Some of the identified 'new supply' in respect of industrial land could potentially come forward as office space, seeking to bring supply and demand more into balance. In turn, this is a policy consideration for the Local Plan, including "integrated office space within factories and warehouses."
 - The 8 ha identified new supply could be lower (and hence the under-supply higher), because it assumes new office floorspace at sites that would not align with the Council's spatial strategy (discussed further below), which is one of building momentum behind a **town centre vision** that includes a strong focus on new office floorspace. However, on the other hand, a strategy focused on new office floorspace in the town centre will mean a strategy involving sites coming forward with high plot ratio assumptions (i.e. high density) such that less land is needed.
 - A further consideration is whether the Local Plan will support the redevelopment of office sites for alternative uses over-and-above levels assumed through the ELNSS. This is a matter discussed further below, including in relation to 'Windmill Hill'.
 - With regards to the **industrial land**, the key point is that there is also a need to look beyond the 'technical over-supply' to consider more qualitative factors around ensuring a **diverse supply** in terms of type and location. On this basis the ELR strongly suggests a need for ongoing consideration of options for new employment land regardless of the technical over-supply – see Box 5.1.
 - To reiterate, the ELR work to consider the supply/demand balance is undertaken on the assumption that demand comes from jobs growth of 695 p.a. but there are arguments that can be made for assuming a higher figure.
- 5.2.24. Presented below is a series of charts taken from the ELNSS (2025).
- 5.2.25. To end, the following is a key statistic from the ELNSS:
- "In 2021, the borough's GVA per hour worked (£50.85) was nearly 1.5 times greater than that of the South West (£34.48) and 1.3 times greater than England's (£38.91)."*
- 5.2.26. Furthermore, it is understood that the latest GVA per hour worked figure is now higher, as set out in the Swindon Economic Growth Plan (2026) – see Box 5.2.

Figure 5.4: Indexed office floorspace change**Figure 5.5: Office floorspace vacancy over time****Figure 5.6: Indexed industrial floorspace change**

Box 5.1: Discussion of qualitative employment land needs and supply opportunities

The ELNSS notes that the identified industrial land supply is concentrated at two sites: 1) the former Honda site (now owned by Panattoni; 139 Ha); and 2) the Great Stall West site (assumed to be in Tritax Symmetry ownership; 41 Ha). These sites may both deliver warehousing/logistics and are in close proximity, which serves to highlight the importance of looking beyond headline demand/supply balance figures to consider the needs of small – mid-sized businesses not well suited to locating on major industrial parks dominated by warehouses and HGVs. The ELR explains (emphasis added):

*“This also reflects what the market is currently seeking. Stakeholders... noted that inward investors may wish... a freehold arrangement. While both of the above major sites could feasibly be sold off in parts, it is unlikely... due to strategic private sector ownership. **The Council may therefore wish to consider providing additional supply to meet a wider range of needs. This could mean allocating sites specifically for longer-term inward investment opportunities.** Ones that are in public ownership present the most realistic opportunity for freehold sale... A few stakeholders have suggested sites [close] to the M4... working with Wiltshire Council...”*

Another suggestion (raised through stakeholder engagement, as opposed to an ELNSS recommendation) is *“strategic land greenfield release to capture major foreign direct investment.”*

The ELNSS also explains that Swindon lacks a science and technology park, and there could be an opportunity here around supporting advanced manufacturing and research and development, building on the town’s industrial heritage and attracting sectors like sustainable technology. This need not necessarily mean the urban edge, as a focus could be around the station quarter where several knowledge-based industries are gathering (ICAST, UKRI and the UK Space Agency).

Windmill Business Park at near M4 J16 is also flagged, although this part of the Borough is less well-linked to Oxford, with the ELR explaining: *“A new science and technology offer could also stimulate investment in the borough from businesses currently located in nearby towns such as Oxford, Bath and Reading which... cannot meet their needs. In Oxford, for example, there is a known lack of R&D space for burgeoning sectors...”*

The ELNSS flags a potential focus on the semi-conductor industry as an opportunity to explore, and also the ‘greening’ of logistics and warehousing because of the Borough’s existing transport and logistics profile and noting a strategic location between London and the Gigafactory in North Somerset and the Port Talbot Steelworks once they reopen with an electric furnace.

The possibility of attracting higher education is also a longstanding opportunity, with the ELR concluding: *“There is existing provision in the FE sector in New College Swindon, and the Swindon and Wiltshire Institute of Technology (SAWIOT) but, leveraging existing infrastructure such as iCAST and Swindon UTC, there is potential for higher education provision in Swindon.”*

Finally, the ELNSS includes a focus on collaboration with Business West, Wiltshire and other organisations with a South West focus, but there is also a need to consider Swindon’s role facing east to Oxford and Reading/Slough/London. At the time of writing there is uncertainty around whether Swindon will be located at the eastern extent of west-focused Strategic Authority under the Devolution Agenda, or the western extent of one focused on the Thames Valley.

Box 5.2: The Swindon Economic Growth Plan (2026)

Swindon Borough Council’s Economic Plan 2026-2031 aims to be “a visionary and actionable plan designed to elevate Swindon to the status of a powerhouse city in Southern England.” Leveraging Swindon’s strategic location on the M4 corridor, a history of industrial reinvention, and a highly productive workforce, the plan “ outlines a comprehensive framework for sustainable, inclusive, and accelerated economic growth over the next five years.”

The plan’s foundation is built on Swindon’s proven economic strengths. The Borough boasts a Gross Value Added (GVA) of over £12.7 billion and a GVA per hour worked of £62, ranking it third in the UK for productivity. This high-performance economy is supported by a rapidly growing population, which increased by 10.4% between 2013 and 2023. The plan aims to harness this momentum to address key challenges, such as historical skills gaps and the need for town centre regeneration, by aligning local priorities with major national and regional initiatives.

It focuses on three high-value sectors: Defence, Component Manufacturing, and Financial and Professional Services. For example, in terms of component manufacturing it explains: “Manufacturing is Swindon’s primary economic driver, contributing £2.9 billion... and employing 33,500 people regionally... Leveraging a legacy from Spitfires to automotive, the focus is shifting toward dual-use components for Clean Energy and Defence.” In respect of Financial and Professional Services, the strategy states: “A regional powerhouse, this sector generates £1 billion in GVA and is anchored by the headquarters of Nationwide and Zurich UK.” The aim is to transition “from a traditional back-office hub into a high-value centre for Fintech and sustainable finance.”

Important contextual discussion is as follows:

“This plan is... an integral part of wider national and regional policy. The Council’s approach is to demonstrate how Swindon is a proactive, reliable partner of government... We have deliberately aligned local priorities with the UK’s Modern Industrial Strategy (MIS), the Defence Industrial Strategy, and the Financial Services Growth and Competitiveness Strategy...

The MIS identifies high-potential sectors like Advanced Manufacturing, Clean Energy, and Defence and highlights the need to support their development in city regions and clusters. Swindon’s plan directly responds to this by focusing on Component Manufacturing and Defence as priority sectors, providing a clear pathway for national investment to land and flourish in the Borough. Similarly, the national Defence Industrial Strategy calls for “Defence Growth Deals”...

Swindon’s role in the ‘Case for Cities’ coalition, comprising cities like Oxford, Reading, and Cambridge, argues that many English cities are “underpowered, underbounded, and underfunded” by outdated governance structures. The Swindon Economic Plan uses this argument to advocate for a more autonomous, city-led governance model. The document argues that a “right-sized” local authority, with boundaries that reflect the functional urban area where people live, work, and move, is essential for delivering coherent, long-term plans for housing, infrastructure, and economic growth. This positions the Council’s ambitions... as part of a devolved Thames Valley MSA enabling effective regional growth and planning.

... The plan [also] builds upon our former work with Wiltshire Council articulated in the Economic strategy for Swindon and Wiltshire 2025-2031. It acknowledges the vision of driving inclusive and sustainable growth across the region while maintaining a clear and distinct focus on Swindon’s unique economic strengths and investment priorities, such as the development of the Swindon M4 growth zone and the strategic sites within the Borough, including those in the Heart of Swindon Vision 2025 and Local Plan 2043.”

Key investment & regeneration sites are as follows:

- **Kimmerfields** – the flagship town centre regeneration project to deliver a Central Business District with Grade A office space tailored for “our Financial and Professional Services giants”; co-locating corporate leaders with educational institutions and high-quality residential units; a dense, walkable urban core that drives ‘innovation through proximity’
- **Knowledge Central** – a ‘once-in-a-generation’ strategic asset adjacent to the Swindon station. The site serves as a hub for higher education and research, anchored by the historic Carriage Works and the national headquarters of UK Research & Innovation (UKRI). By integrating modern incubation spaces, vibrant public realms, and up to 4,000 new homes, it can transform Swindon’s rail heritage into an innovation district that attracts talent and sustains economic renewal.
- **Panattoni Park** – ‘re-industrialising for the future’ at the former Honda site. One of the largest industrial redevelopments in Europe, the site is the cornerstone of ambitions for Component Manufacturing and the green economy. The Borough is proactively marketing this asset to Clean Energy and Defence supply chains to reinvent Swindon’s manufacturing legacy.
- **Brunel Quarter & Creative Hubs** – the Brunel Quarter will transform the retail and leisure landscape, while integrated digital hubs will provide flexible workspaces for the Digital and Creative sectors, ensuring a “destination of choice” for the next generation of innovators.

NEV & Great Stall – to support a growing workforce, these major developments provide the essential housing and infrastructure required to sustain economic expansion. These are not merely housing estates but connected communities designed to link residents directly to primary employment hubs, reducing out-commuting and enhancing the local labour pool.

Gypsies, Travellers and Travelling Showpeople (GTSS)

- 5.2.27. The Borough currently has 44 authorised Gypsy and Traveller pitches and 1 Travelling Showperson plot. The Gypsy, Traveller, and Travelling Showpeople (GTSS) Accommodation Needs Assessment (2024) establishes a need for 35 new pitches and 19 Travelling Showperson plots, primarily over the early years of the plan period.
- 5.2.28. Providing for GTSS accommodation needs through Local Plans is often very challenging, including due to a lack of sites being made available for this use in suitable locations. However, it is crucially important, as poor accommodation can be a barrier to maintaining the traditional way of life, can lead to tensions with settled communities and contributes to acute issues of relative deprivation, with Travellers on average having very poor outcomes across health, education and other indicators, as discussed [here](#). A recent [blog](#) prepared on behalf of the Royal Town Planning Institute (RTPI) explains how failing to provide for accommodation needs in full is all too common.
- 5.2.29. It is crucial to tackle the issue rather than deferring to a follow-on plan, for example:
- Wiltshire – the Inspector examining the submitted Local Plan wrote to the Council in 2025 explaining: “... we note that the Plan does not specifically address the matter of travellers housing needs as it is otherwise intended to be dealt with under a separate Gypsies and Travellers Development Plan Document (DPD)... anticipated to be adopted by Quarter 3 of 2025. In light of that situation, we would welcome an update on the current status of the... DPD, together with the Council’s view as to whether there should be provisions in the Plan to ensure certainty of how those needs would otherwise be met in the event that the... DPD were not to reach adoption.” However, progression of the plan is now uncertain, with the plan [website](#) reporting (as of July 2026) that the plan will be published under Regulation 19 in Q2 2026.
 - Maidstone – the Local Plan (2024) generates in excess of 500 pitches unmet need and the follow-on plan tasked with providing for these needs was recently [withdrawn](#).
 - Windsor and Maidenhead – the Local Plan was adopted in 2022 on the assumption that a follow-on plan would be adopted post-haste, but there has been no progress.¹²

Conclusion on growth quanta

- 5.2.30. This section has considered housing needs, employment land needs and GTSS accommodation needs in turn. In summary:
- Housing – attention focuses on growth scenarios involving setting the housing requirement at LHN (with a supply sufficient to provide for this year-on-year, which necessitates a ‘supply buffer’ as a contingency for delivery issues). However, given the *potential risk* of unmet needs (in particular) there is also a need to remain open to higher growth (N.B. this is not the same as saying that there *are* unmet needs).
 - Employment land – in headline quantitative terms there is a need for new allocations to deliver office floorspace but not industrial land. However, there are also a range of important qualitative considerations, such that industrial land allocations remain a key matter warranting ongoing consideration as part of the local plan-making process. The ambition of the Economic Growth Plan is a key consideration for growth scenarios.
 - GTSS – needs are clear and must be provided for in full. Unmet needs from elsewhere can also be a consideration but needs tend to be very localised.
- 5.2.31. These conclusions are broadly unchanged from the Interim SA Report (2025).
- 5.2.32. The question of growth quanta to reflect across the RA growth scenarios is returned to in Section 5.5, following consideration of broad spatial strategy and supply issues/options.

¹² The Inspectors Report stated: “It is unfortunate that the Traveller Local Plan has been delayed, but... good progress has been made... Most recently, an Issues and Options Report and a Site Assessment Methodology were published for consultation.”

Broad spatial strategy

- 5.2.33. The aim of this section is to explore 'broad spatial strategy' issues, opportunities and options, building upon the introductory discussion presented in Section 2.
- 5.2.34. It is important to re-emphasise that this amounts to an early high level discussion, with discussion of certain broad spatial issues and opportunities deferred to Section 5.4.

Overview

- 5.2.35. The equivalent section from the Interim SA Report published as part of the Draft Plan consultation in 2025 begun by explaining:

"The broad spatial strategy has evolved over four Regulation 18 stages prior to the current consultation (also under Regulation 18). However, it is equally the case that there is now a proposal for a "new strategic direction". This concept features prominently within the current Draft Local Plan consultation, which explains: "Whilst some of the Borough's opportunities and challenges remain the same, a lot has changed since the last adopted Swindon Local Plan. With changes and opportunities comes new direction, and this Local Plan plans to focus on the following strategic directions which will positively contribute towards the Swindon Plan's 3 missions."

The plan document goes on to identify two key spatial priorities..."

- 5.2.36. The two key spatial priorities that were then discussed in detail were: 1) Town centre rejuvenation and urban housing density; and 2) Environment and movement. As part of this, under (2) there was a detailed discussion of 6 strategic transport corridors.
- 5.2.37. At the current stage the town centre focus remains and, indeed, is further strengthened including informed by the Economic Growth Plan, which has been introduced above. More specifically, the focus is on 'Swindon's Central Area'. Also, there remains a strong focus on growth in the wider urban area, with the current plan document explaining that the specific focus is: *"where opportunities exist to redevelop underutilised brownfield land and make efficient use of existing infrastructure and services."*
- 5.2.38. With regards to the six strategic transport corridors (or 'transit corridors'), these do remain a central feature of the Transport Vision discussed within the plan, which feeds into the spatial strategy. However, they are less central to the spatial strategy relative to the Regulation 18 stage. This is because few development sites – which are needed to bring investment – have not come forward along the transit corridors.
- 5.2.39. Ultimately, Policy SS1 (Swindon's Spatial Approach to Growth) in the current plan document breaks down the spatial strategy as follows:
- Directing growth to Swindon's Central Area, providing a mix of homes and employment, including new office floorspace, that supports the regeneration.
 - Focusing development in the wider urban area, prioritising the redevelopment of underutilised brownfield land and encouraging growth along key transit corridors.
 - Developing comprehensively planned new communities in well-connected locations outside the existing settlement hierarchy.
 - Supporting proportionate development in rural service centres and larger villages.
 - Ensuring new employment land for industrial and warehouse uses is well located in relation to the strategic road network.
 - Safeguarding and encouraging intensification of existing employment areas proportionate to their level of access to key transit corridors.
- 5.2.40. These elements of the spatial strategy are discussed in turn below.

Swindon's Central Area

- 5.2.41. The current plan document introduces the town centre as follows:

"The Town Centre remains one of Swindon's greatest opportunities. It has faced real challenges, particularly as shopping habits have changed and national retailers have reduced their high street presence. But Swindon town centre still has major assets: its railway station, its proximity to employment, the Designer Outlet, heritage attractions, cultural venues, and significant brownfield regeneration opportunities.

Significant funding has also gone into improving connectivity to the Town Centre and providing a more pleasant, cohesive public realm through the redevelopment of Fleming Way as a public transport interchange. The Fleming Way scheme has already improved the main gateway between the railway station and the town centre, with bus services moving to the new interchange in August 2025 and the former bus station site being released for regeneration.

The town centre has declined over several years. This has been driven by national changes in retail, the growth of online shopping, competition from out-of-town retail, and a lack of confidence in parts of the central area. Vacancy rates, a poor public realm in some locations, and weak links between the railway station and the retail core have all contributed to a sense that the town centre has not fulfilled its potential.

The priority now must be regeneration, not managed decline. The town centre needs more residents, more workers, more visitors and more reasons for people to spend time there. That means supporting mixed-use development, bringing brownfield land back into productive use, improving public spaces, attracting private investment, and making the centre feel safer, cleaner and more welcoming."

- 5.2.42. The Heart of Swindon Vision (2025) has already been introduced above, as well as the Strategic Economic Plan (2026) which lists six key investment & regeneration sites, of which four are located in the town centre.
- 5.2.43. Also, a Town Centre Topic Paper has been prepared on the basis that: "Enabling regeneration of Swindon's Town Centre is a central objective of the New Local Plan." In particular, a key aim of the Topic Paper is to "[summarise] the council's aspirations for area and how this will be progressed [and discuss] the viability concerns raised during the plan preparation and how these are being addressed."
- 5.2.44. Viability concerns were also a focus of discussion within the Interim SA Report (2025), which emphasised the importance of not repeating the mistakes of the past in terms of committing to growth that does not deliver such that the Borough cannot maintain a 5YHLS and is subject to the presumption in favour of sustainable development (e.g. see discussion above regarding how NEV was anticipated to have delivered 8,875 homes by 2026). Also, the Interim SA Report sought to emphasise that reliance on challenging urban sites in any context nationally, let alone in Swindon town centre, invariably risks a situation whereby sites can only viably deliver after compromises have been made regarding policy asks including in terms of affordable housing and infrastructure.
- 5.2.45. On the other hand, there is no question of the need to build momentum behind a town centre vision in order to attract investment and to attract major employers, particularly to the Kimmerfields and Knowledge Central key investment & regeneration sites discussed above, and including existing major employers in Swindon who the Council would like to see relocate to the town centre. Without a strong long term vision for the town centre there is no potential to deliver on the aspirations of the Economic Growth Plan, for example becoming the fastest growing town in England and transitioning "from a traditional back-office hub into a high-value centre for Fintech and sustainable finance."
- 5.2.46. There is clearly a need to strike a balance, and to a considerable extent this is in respect of timing. In particular, there is a need to caution against relying overly on housing supply from challenging and ultimately uncertain town centre sites to deliver the housing requirement in the earlier years of the plan period, i.e. those years that will fall within the 5YHLS window ahead of a new local plan that is the next opportunity to boost supply.

5.2.47. Also, in terms of grade A office floorspace, there is a need to caution against over optimistic assumptions about when this will deliver such that existing companies can relocate (thereby freeing up older office developments for housing-led redevelopment).

5.2.48. Having made these overarching points, the following is a summary of the Topic Paper:

- The strategic mandate – “The regeneration of Swindon's town centre is a corporate commitment that runs through every tier of the Council's strategic framework... fundamental to achieving Swindon's aim as key regional centre in the Thames Valley.”
- A single integrated strategy – the Economic Growth Plan explicitly frames economic prosperity as "the essential engine" for achieving broader social and environmental goals. The Heart of Swindon Vision is the spatial delivery mechanism for those same missions, translating them into streets, buildings, homes, and public spaces. The Local Plan 2043 provides the statutory backbone. The town centre regeneration programme is central for correcting Swindon's long-standing weakness: a town centre that fails to attract, retain, and reflect the quality of Swindon's economic output.
- Correcting a structural imbalance – there is a tension at the heart of Swindon's economic story, namely that exceptional productive capacity has not been matched by a town centre capable of projecting it. The Heart of Swindon Vision responds directly to this diagnosis. Its proposals for up to 8,000 new homes, the Kimmerfields Central Business District, Knowledge Central at the station gateway, and the regeneration of the Brunel Quarter are not speculative ideas. They are the corrective interventions the Economic Growth Plan identifies as essential to rebalancing the relationship between Swindon's productive economy and the quality of place that sustains it.
- The productivity–place connection – the Economic Growth Plan makes an explicit case that place quality is an economic variable, not an aesthetic one. Swindon's ability to attract and retain high-value employers in its three priority sectors depends on the Borough's capacity to offer a compelling living environment for skilled workers. The ambition to create a Connected centre, a centre for Learning, a Vibrant centre, and a Creative centre is not cultural policy for its own sake.
- Local plan policies as the enabling framework – the local plan allocations are key but are not the end of the story. There is also a need for policy to guide windfall, requirements for developers to engage with local skills and employment pathways, and there is also the decision to switch off Community Infrastructure Levy requirements within the town centre boundary to reduce viability to delivering stalled sites.
- A nationally aligned corporate priority – the Economic Growth Plan positions the Borough as an active partner in three key Government strategies that all treat place quality as a prerequisite for sectoral investment. A council that can't show coherent, funded, and policy-backed plans for its town centre can't credibly compete for the national investment those strategies unlock.
- A holistic approach to placemaking – the Heart of Swindon vision provides a coordinated spatial framework: a centre for living (8,000 new homes across sites like the Brunel Quarter, Kimmerfields, Spring Gardens, and Wyvern Theatre etc to build a critical mass of residents, sustaining daytime footfall and driving a vibrant mixed-use centre); a knowledge centre (particularly Knowledge Central at the station gateway); a centre for learning (New College, Oxford Brookes, the UTC, Royal Agricultural University, and Wilkes Academy; physically within the town centre through student housing, a Fleet Street social hub, and a reinvigorated Wyvern Theatre complex); a creative centre (including a major new performance venue); a green and healthy centre (including 1,000 new trees); a vibrant centre (moving decisively beyond retail); a connected centre (e.g. addressing the train line as a barrier, including via Knowledge Quarter); and a proud centre (design quality, heritage sensitivity, and civic character).
- Key planning policy levers – *“What distinguishes Swindon's approach is that the Council has deliberately configured its statutory planning toolkit to make delivery not just possible but inevitable — provided investment follows.”*

- The single most important planning principle underpinning the Heart of Swindon Vision is that regeneration must be coordinated. Piecemeal development — individual sites coming forward in isolation, without reference to infrastructure, public realm, or neighbouring land uses — has been the default mode of town centre change in Swindon for decades, and it has produced a fragmented, underperforming centre. The Local Plan 2043 breaks explicitly with that model. Strategic site allocations at Kimmerfields, Knowledge Central, the Brunel Quarter, and North Star are framed as components of a single spatial framework.
- Higher-density development can maximise the productive use of scarce central land, supports the business case for public realm investment, and creates the critical mass of activity that makes a genuinely urban centre function.
- Two locations are pivotal to the vision: 1) the Station Gateway which is the site of Knowledge Central and the primary address for high-value business investment; and 2) Fleming Way which is the east-west spine linking the station and Knowledge Central to Kimmerfields and the retail core, making the component parts of the regenerated centre accessible, legible, and mutually reinforcing.
- Taken together, these planning enablers send a clear signal to developers, investors, and occupiers: Swindon is not waiting to see what the market delivers. It has a spatial plan, a policy framework, and a set of financial levers actively configured to support coordinated, high-quality, high-density development in precisely the locations where it will generate the greatest economic and social return. That certainty is rarely achieved in town centre regeneration.
- Viability challenges – the Council is very aware of the argument being made by some developers that town centre sites are currently unviable, and that greenfield land on the urban periphery offers a faster, cheaper, and lower-risk route to housing and employment delivery. It is acknowledged that key viability challenges relate to remediation, site clearance, the future homes standard, affordable housing as a priority, the Future Homes Standard, biodiversity net gain and recent building safety regulations with implications for building above six storeys. Key responses include: A) focusing on larger strategic sites such as Kimmerfields and Knowledge Centre where the Council owns land; B) coordinating masterplans to avoid piecemeal less viable development; C) forming regional partnerships with key stakeholders such as Homes England and promoting the case for growth as part of the new Thames Valley Combined Authority; D) looking to form longer term development and investment partnerships with larger developers and investment organisations; E) working up phasing plans to look at sequencing of affordable housing and infrastructure provision to aid viability; F) forming a new Economic Development unit in the Council to engage with the development and finance industry to promote growth in Swindon Town Centre.

5.2.49. The Topic Paper concludes as follows:

“Viability assessments are key to understanding the challenges but by their nature, a snapshot... The risk of allowing it to drive planning decisions is significant and well-evidenced: greenfield permissions granted on viability grounds today systematically undermine the investment case for town centre sites tomorrow... Piecemeal peripheral growth does not just fail to solve the town centre problem. It actively compounds it.

Swindon's town centre is a heavily supported, long-term regeneration priority with statutory planning policy, corporate strategy, and a growing pipeline of public and private investment aligned behind it. The Local Plan's spatial strategy... exists precisely to resist the path of least resistance and to hold the conditions necessary for coordinated, high-quality regeneration to succeed... The Council's position is therefore unambiguous. Viability concerns on individual town centre sites will be engaged with constructively and in good faith. But they will not be allowed to justify a retreat to the periphery that leaves the heart of Swindon stranded. The vision is long-term. The commitment is firm. And the planning framework will reflect both.”

5.2.50. Specific town centre sites are discussed further in Section 5.4.

The wider urban area

5.2.51. As discussed, at the Regulation 18 Draft Plan stage there was a strong focus on six transit corridors in the hope that this would lead to land being made available for development in support of coordinated investment, but few sites were put forward in practice. Nonetheless, the transit corridors remain a key aspect of the spatial strategy. They are set out on the current Key Diagram (Figure 5.7) and are introduced below:

- North – the A4311 links the town centre to the committed Kingsdown strategic allocation via a number of residential estates (Penhill, Pinehurst), two large industrial/commercial areas, a retail/leisure area and a secondary school, plus this is the route that links the Blunsdons to the town centre. Aside from Kingsdown there is limited committed growth along this corridor and there are no local plan allocations; however, 'Northern Gateway' (SDA05) is a major new allocation that has been added to the plan since the Regulation 18 stage that is located close to the corridor (west of Kingsdown). Further growth opportunities for ongoing consideration include sensitive estate regeneration potential and the intensification of vacant brownfield land.
- North east – this is a new proposed corridor since the Regulation 18 stage. It is the route linking to Highworth, where there are now two new proposed allocations.
- East – the A4312/A420 corridor is of key strategic importance, linking the town centre to NEV, where the proposal is for almost 9,000 homes (as discussed below) and the possibility of further growth is an option to consider, e.g. with a view to a second train station, and recognising the importance of links to Oxford. Furthermore, located along the A4312 is Marlowe Avenue (SDA03), which is an aspirational Urban Regeneration with an adopted masterplan (2022), assumed to deliver 500 homes *beyond the plan period*. Further opportunities are around retail parks and vacant industrial land.
- South east – the A4259 links the town centre to the hospital and Coate Water via neighbourhoods that are in the 10% most deprived nationally (Walcott East and Park South). There is little in the way of currently identified new supply but, once again, the hope is that by signalling a clear 'corridors focused' growth strategy landowners (including the Council) will be encouraged to make land available in time. There is also an important recent estate regeneration scheme here, namely Queens Drive, which involved replacing 89 council owned homes constructed in the 1960s with 149 new high quality council owned affordable homes. Potential growth opportunities include sensitive estate regeneration and the development of excess highways land.
- South – to the south of the town centre is the hilltop Old Town, and then south from here is the A4361 linking to the Wichelstowe committed strategic allocation (SDA06), the village of Wroughton (where there is a growth opportunity; discussed below) and then the primary identified Urban Regeneration Area outside of the town centre, namely Pipers Way (SDA02). Focusing on Wichelstowe, the eastern neighbourhood that has been completed is that which is best connected, with the remaining phases to be completed notably located between transport corridors, although there is a cycle route along a former railway that links this area to the A4361 and Old Town.
- West – the western part of Swindon is notably separated from surrounding areas by the River Ray corridor, rail / road corridors and industry. There is no direct road corridor linking to the town centre, but there is a desire to strengthen links to West Swindon District Centre. This is a more modern part of Swindon, such that there is less in the way of opportunity to regenerate areas with an ageing built environment, but attention does focus on the areas of amenity greenspace designed-in as part of developments, including along select road corridors. There is a new proposed allocation here since the Regulation 18 stage (Windmill Hill; SDA04) and the transit corridor has been adjusted to show how it could link to the District Centre and on to the town centre, plus there is the potential to link to Wichelstowe to the east.
- North west – north of the town centre there a series of older neighbourhoods including some that are amongst the 10% most deprived nationally and then, north of here, are Swindon's most recent neighbourhoods, including Tadpole Garden Village. Radial connectivity between the northern neighbourhoods and the town centre is a major issue, with late 20th century new neighbourhoods having come forward either side of a

major orbital route, namely A4198 (completed in 2001).

However, there is an opportunity now to take a vision-led approach to addressing this issue, and the B4006/B4587 has been selected as a strategic transit corridor. There are two allocations including one of which is new since the Regulation 18 stage (SDA10) and, aligned with this, the corridor now extends further to the north. Also, there is now the potential for this corridor to link across the A419 to Broad Blunsdon.

- 5.2.52. The above bullet points aim to demonstrate the logic of a new urban ‘movement’ focused strategy, and it is also important to add that this is key to net zero ambitions, given that development viability potentially limits what can be achieved in terms of built environment decarbonisation. Swindon is a ‘car friendly’ town reflecting the proportion of the town that is 20th century in origin, which is a barrier to achieving a Net Zero Borough, but this only serves to emphasise the need to make every reasonable effort to maximise the rate of transport decarbonisation (plus there are many wider arguments in support of a planning focus on modal shift away from car dominance).

Comprehensively planned new communities

- 5.2.53. There is a clear case for a strong focus on strategic growth locations and clusters of sites that can deliver strategic infrastructure. This was the proposed approach at the Regulation 18 Draft Plan stage, and it remains the proposed approach, although there are some adjustments in this regard, which are discussed further in Section 4.
- 5.2.54. However, it is also acknowledged that there is a case for smaller greenfield sites without major infrastructure dependencies that can deliver early and with low delivery risk. This is an important consideration for the local plan with a view to a robust housing land supply, namely one whereby there is a healthy supply headroom over-and-above the housing requirement in the early years of the plan period, with a view to ensuring confidence that the Council can maintain a 5YHLS / avoid the presumption.

Proportionate development in rural service centres and larger villages

- 5.2.55. The settlement hierarchy is firmly established and is a key spatial strategy consideration:
- Central area – discussed above.
 - Urban area – discussed above.
 - Rural service centres – Highworth was proposed was proposed low growth at Reg 18 but now sees two additional allocations. Wroughton was proposed high growth at Reg 18 but is now proposed lower growth better aligned with the settlement hierarchy. There are two proposed SDAs in close proximity to Tadpole Garden Village.
 - Large villages – Broad Blunsdon sees higher growth including as it relates closely to the Swindon and Kingsdown; the allocations are unchanged from Reg 18. The remaining three villages (Chisledon, South Marston and Wanborough) are not proposed growth (as per Reg 18), which is a matter for ongoing consideration (noting the discussion above regarding smaller sites), although there are reasons to suggest limited growth opportunity in all cases. Also, the Parish Councils have the potential to prepare Neighbourhood Plans that allocate sites to deliver on local needs / objectives).
 - Smaller villages – there is little or no reason to question nil growth at these villages.
 - New settlement – no new settlement is proposed, but there is one option for further discussion below, namely Burytown, located between Highworth and Broad Blunsdon. This is not a well-connected area but is notably in proximity to Cotswold District.

Employment land

- 5.2.56. Policy E2 (New Employment Sites) lists 6 sites, but one of these is consented and is a smaller site, namely South Marston Centre (NEV), which will deliver 1,000 sqm offices.
- 5.2.57. This leaves 5 sites, of which 4 are in the town centre.
- 5.2.58. Of these one is recently consented, namely ‘North Star (including Oasis) – Hawksworth

Way (Old Clares Factory Site)', which will deliver 27,000 sqm of floorspace for light industrial / warehousing / data centre as well as 2,000 sqm ancillary office space.

5.2.59. The remaining 3 town centre sites are as follows:

- Knowledge Central – 44,000 sqm offices and R&D
- Kimmerfields – 20,000 sqm offices
- Bridge Street / Fleet Street – 20,000 sqm offices

5.2.60. These are mostly not consented (Kimmerfields has some consents) such that together they form the core of the proposed spatial strategy. The plan document explains:

“A key focus of the strategy is also the recentralisation of office development, directing new office floorspace back into Swindon’s Town Centre. This approach strengthens the town centre’s economic role, supports regeneration initiatives and promotes sustainable travel patterns by locating employment opportunities in the most accessible areas...”

5.2.61. The remaining site is then Great Stall West within NEV, which is already committed on the basis of the adopted Local Plan, although not yet consented. It will deliver 26,000 sqm floorspace for industrial and warehousing and 8,000 sqm office floorspace.

5.2.62. The combined effect is a total employment land supply that significantly exceeds the need figures established through the ELNSS, as discussed above, both in terms of office floorspace and industrial land.

5.2.63. As such, there is scope to consider the selective housing-led redevelopment of existing employment areas, with the three key proposals as follows:

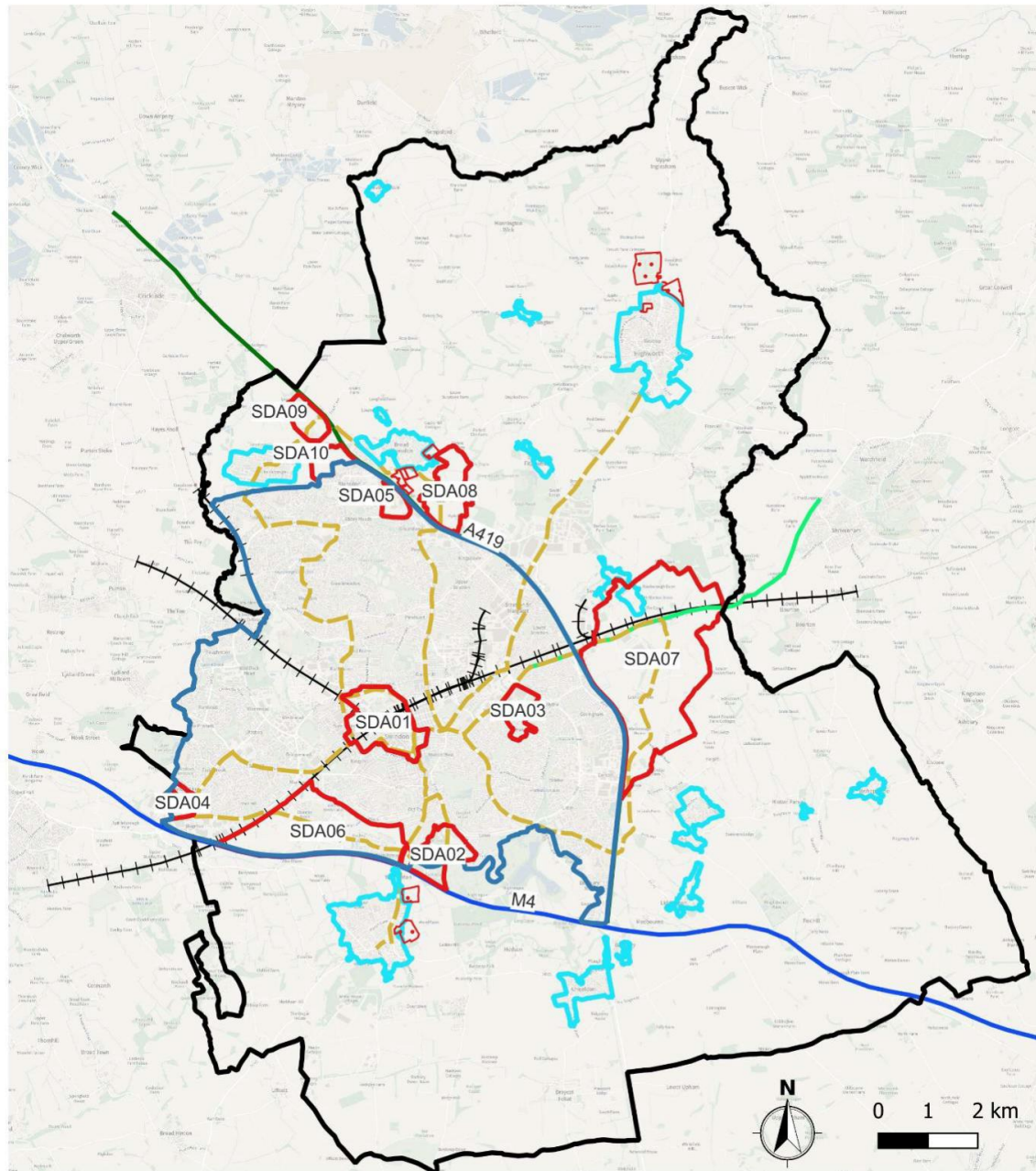
- Pipers Way (SDA02) – in total comprises four sites of which two are existing employment sites that are identified by the ELNSS (2025) as having potential to be redeveloped for an alternative use.¹³ Proposals are unchanged from Reg 18, and will primarily involve residential with an element of mixed use.
- Windmill Hill (SDA04) – is a new proposed allocation for Reg 19. The site currently comprises of a business park which contains 11 buildings primarily used as office spaces, as well as a children’s nursery. The office buildings date from the 1980s and are set within a purposefully designed landscape. It is located 4.5km from the town centre adjacent to the A3102 dual carriageway (just off M4 Junction 16) and the B4534 dual carriageway. The ELNSS noted significant vacancy, but the study suggested that it could have a role moving forward, including possibly as a science and technology park. The proposal is for residential with an element of mixed use.
- Gateway North (SDA05) – the site occupies a highly accessible location, adjacent to residential areas of Blunsdon St Andrew and the strategic road network, including such that there are good links to the town centre, which is around 5km to the south. The site is in two parts: A) a northern part that is a vacant previous employment site that has been a long-standing employment allocation that has failed to deliver such that Homes England acquired the site and submitted a planning application for 159 homes in 2019; and B) a southern part that comprises an existing employment site, specifically the occupied by Vygon, who area a manufacturer of medical and surgical devices. There are significant challenges in respect of traffic impacts / mitigation, including accounting for the cumulative effect of growth at Kingsdown, Broad Blunsdon and elsewhere in the area, and National Highways have a particular concern (at the time of writing) regarding the A419. See further discussion in Section 5.4.

¹³ Wakefield House is currently vacant having been a former headquarters and is in a run-down state. Secondly, in respect of the Intel site, the ELNSS states “... Intel is due to vacate imminently. The building has low market attractiveness... its reuse for offices would again not support town centre redevelopment but potentially alternative accommodation for Intel would.”

Conclusion on broad spatial strategy

5.2.64. This section has introduced the proposed broad spatial strategy, which is similar to that from the Regulation 18 Draft Plan stage, although there are some notable adjustments (changes were reported to Cabinet on 1st July 2026; see [Appendix 1](#) of the plan). Also, this section has introduced some of the key issues and potential choices/options, ahead of further discussion of supply options and growth scenarios below.

Figure 5.7: The Local Plan key diagram (2026)



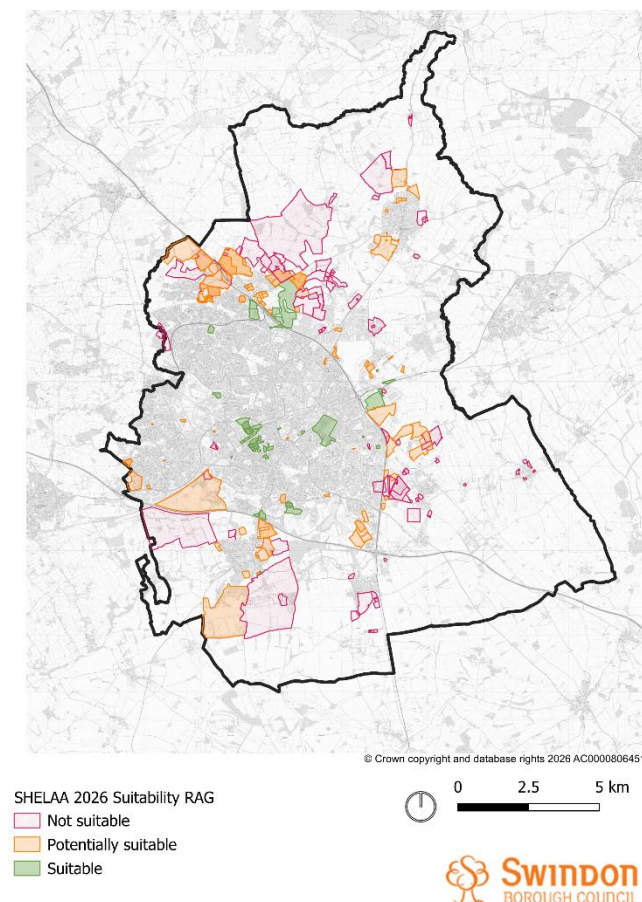
Key

- | | |
|-----------------------|--------------|
| Urban Area Boundary | A419 |
| Borough Boundary | A420 |
| (SDA01-SDA10) | Railway Line |
| (SDA11-SDA13) | |
| Settlement Boundaries | |
| Key Transit Corridors | |
| M4 Motorway | |

5.3. Site options

- 5.3.1. This section considers the individual site options that are the building blocks for growth scenarios. The aim is not to present an appraisal of site options, but rather to signpost to officer led workstreams that have appraised/assessed site options and which have led to a shortlist of site options to consider further in Section 5.4.
- 5.3.2. The key officer-led workstream examining the merits of individual site options is the Strategic Housing and Economic Land Availability Assessment (SHELAA). The SHELAA was published for Regulation 18 in 2025, and has now been updated.
- 5.3.3. The SLAA primarily places site options into one of three categories: 1) suitable; 2) potentially suitable; and 3) unsuitable.
- 5.3.4. The combined capacity of the suitable sites is significantly below LHN (21,654 homes over the plan period, as discussed in Section 5.2). As such, these sites are associated with a clear case for allocation (but some comprise challenging urban sites where there is a need to carefully consider site capacity and assumed delivery in the plan period).
- 5.3.5. The combined capacity of suitable and potentially suitable sites is then very significantly higher than LHN. As such, there is very little case to be made for allocating any of the unsuitable sites (but the possibility cannot be discounted, as discussed further below).
- 5.3.6. In turn, for the purposes of defining RA growth scenarios a key question is which of the potentially suitable sites should feature – see further discussion below. Some of the potentially suitable sites are proposed allocations whilst others are ‘omission sites’.
- 5.3.7. Finally, it can be noted that the list of potentially suitable sites is now much longer than was the case in 2025, with 38 unsuitable sites from 2025 now potentially suitable.
- 5.3.8. The SHELAA outcomes are shown in Figure 5.7.

Figure 5.8: SHELAA outcomes 2026



5.4. Combining top down and bottom up

Introduction

- 5.4.1. Discussion has so far focused on A) 'top down' consideration of strategic factors (growth quantum and broad spatial strategy); and B) 'bottom-up' consideration of site options.
- 5.4.2. The next step is to bring these factors together in order to identify site options and combinations of site options that should be taken forward to the RA growth scenarios.

This is an inherently challenging aspect of local plan-making, and so it is important to break the task down. In this instance the task is broken down by focusing on: 1) Sub-areas (housing focus); 2) Employment land needs; 3) GTSS accommodation needs

Methodology

- 5.4.3. Focusing on (1), the aim is to draw together the 'top down' and 'bottom up' inputs discussed above before concluding on combinations of supply options – henceforth sub-area growth scenarios – to take forward to Section 5.5, where the aim is to combine these to form borough-wide RA growth scenarios for appraisal and consultation.
- 5.4.4. With regards to employment land and GTSS accommodation the situation is more straightforward as there is simply a need to reach a conclusion on RA growth scenarios.
- 5.4.5. The aim here is not to present a formal appraisal, but rather to contribute to “an outline of the reasons for selecting” the RA growth scenarios ultimately defined in Section 5.5. Accordingly, the discussions are systematic only up to a point, with extensive application of discretion and planning judgment. The aim is not to discuss all site options to the same level of detail, but rather to focus attention on those *judged to be more marginal*, i.e. where the question of allocation is more finely balanced.
- 5.4.6. As such, site options are discussed in broad order of performance in light of: Section 5.2 (which allows for an understanding of broadly how much development is needed borough-wide and how it should/might be distributed); and Section 5.3 (which signposts to the officer-led workstreams differentiating the merits of site options).
- 5.4.7. It is also important to be clear that sub-area growth scenarios are discussed below on the basis of an understanding of the preferred approach to sites / supply which, in summary, involves a total supply of 24,988 homes, comprising 12,075 homes from completions and commitments, a windfall assumption of 1,190 homes and 11,733 homes from non-committed allocations.
- 5.4.8. This proposed supply figure of 24,988 is 15.4% above plan period LHN, such that there is limited strategic case for considering omission sites other than under scenarios involving: A) non-allocation of select proposed allocations; B) reduced capacity or plan-period supply assumed from proposed allocations; C) a housing requirement set above LHN; and/or D) a longer plan period or support for supply that will deliver beyond 2043.

Sub-areas

- 5.4.9. The following sub-areas are discussed in turn.

- Swindon town centre
- Northern urban edge
- Eastern urban edge
- Wroughton
- Elsewhere
- The wider urban area
- Northeast urban edge
- Southern urban edge
- Highworth

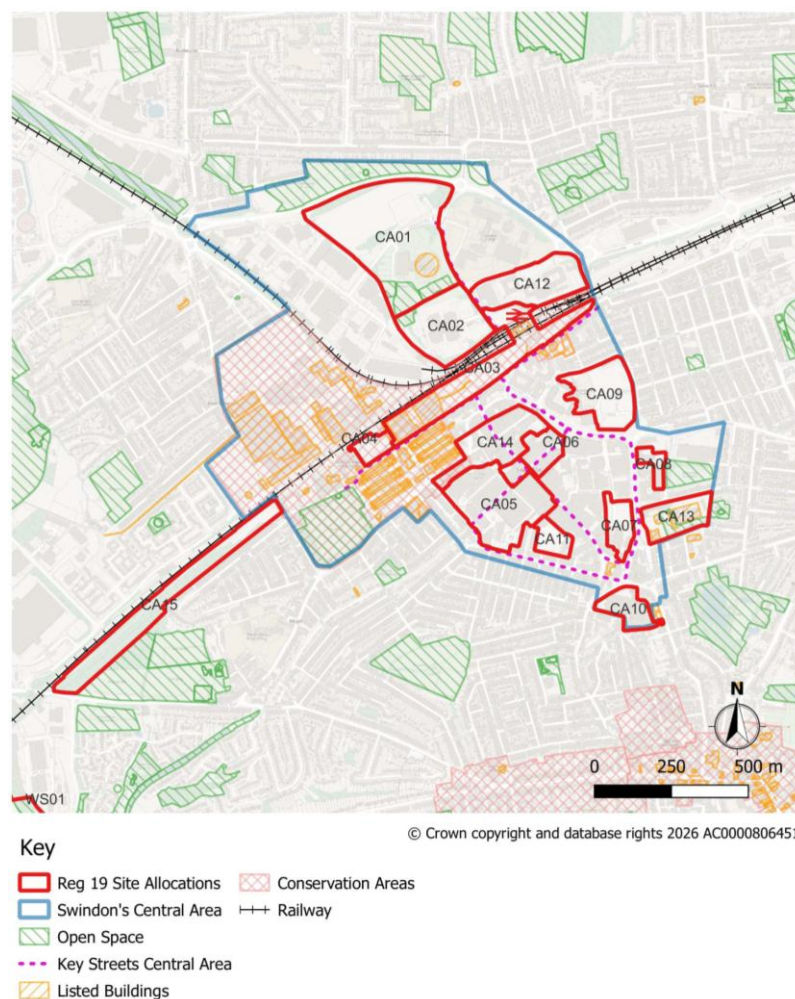
Swindon town centre

- 5.4.10. The town centre / central area has already been discussed above, with the key message (as per Regulation 18) being that there is strong support for the vision-led growth strategy but there is a need for caution regarding assumed supply in the plan period and, in particular, in the earlier parts of the plan period.
- 5.4.11. The 15 proposed allocations are shown below, with these sites mostly not permitted (CA09 has a long standing permission but this is being revisited) although several are at the pre-application stage. All of these sites are 'suitable' in the SHELAA.
- 5.4.12. Total capacity is 4,064 new homes in the plan period with the capacity to deliver a further 1,145 homes beyond 2043, and the aim is to contribute to the longer-term aspiration of delivering around 8,000 new homes and 6,000 new jobs in the town centre.
- 5.4.13. All of the Regulation 18 allocations are retained plus there are now four additional allocations, although one of these is aforementioned CA09 (Kimmerfields). At the Regulation 18 stage the proposal was to deliver 4,347 homes in the plan period, such that it can be seen that a more cautious approach is now taken to plan period supply.
- 5.4.14. Taking sites CA01 (North Star (including Oasis)), CA02 (North Star House) and CA12 (Polaris House) for example, at the Regulation 18 stage these sites were assumed to deliver 2,101 homes in the plan period but the new assumption is delivery of 965 homes in the plan period (plus significant additional assumed office floorspace supply). In particular, CA12 (Polaris House) is now assumed to deliver only post 2043.¹⁴
- 5.4.15. Other points to note include:
- CA03 (Swindon Station / Knowledge Central) – is now proposed to deliver office floorspace only, contrasting with an assumed 438 homes (and offices) in 2025.
 - CA04 (Bristol Street Car Park) – is unchanged from 2025 (102 homes).
 - CA05 (Brunel Quarter) – is broadly unchanged from 2025 (1,000 homes)
 - CA06 (The Parade) – capacity is unchanged (245 homes) but 45 homes are now assumed to deliver *beyond 2043*.
 - CA07 (Wyvern Square) – capacity is increased from 262 to 500 homes.
 - CA08 (Spring Gardens) – is unchanged from 2025 (60 homes).
 - CA09 (Kimmerfields) – compared to the existing permission from 2011 the proposal is to deliver additional office floorspace.
 - CA10 (Regent Circus Complex) – a new proposed allocation for 250 homes.
 - CA11 (Granville Street Car Park) – a new proposed allocation for 160 homes.
 - CA12 (Polaris House) – is discussed above.
 - CA13 (Civic Campus) – is unchanged from 2025 (115 homes).
 - CA14 (Bridge Street / Fleet Street Regen Area) – a new proposed allocation for 200 homes and 10,000 sqm office space but assumed to deliver *beyond 2043*.
 - CA15 (Newburn Sidings) – capacity is increased from 203 to 262 homes.

¹⁴ The Interim SA Report (2025) stated: "... with regards to delivery challenges and associated risks, it is important to note that the main sites are in close proximity... A new urban community here is central to the Local Plan spatial strategy (as discussed in Section 5.2), but there is a need for further work to firm up delivery assumptions, including from a construction phasing perspective, and carparking capacity will also require further investigation. Notably, Polaris House was identified through the Urban Capacity Study rather on the basis of a submission received from the landowner. This is an important office campus discussed within the ELR as home to "science and innovation head offices" that is "in good condition with no obvious vacancies" and which is also highlighted within the Heart of Swindon Vision... On the other hand, the proposed housing supply trajectory is clear that any redevelopment would occur later in the plan period, such that there would be ample opportunity for relocation... Also, with regards to 'North Star (including Oasis)', it has recently had planning permission for a snow dome, but residential will support delivery of this site to include a new swimming pool, recognising that the leisure centre has been closed since 2020."

- 5.4.16. Overall, it is clear that the capacity figures and timing / phasing assumptions reflect detailed work over a period of years including work since the Regulation 18 stage, including as set out in the Town Centre Topic Paper (discussed in Section 5.2).
- 5.4.17. As part of this, it should be noted that the Topic Paper includes an appendix with a proforma for each of the sites that sets out key assumptions and uncertainties / delivery risks, including highlighting sites : A) where there will likely be a need to accept compromises in terms of affordable housing and/or contributions to infrastructure; B) with limited land owner engagement; C) with abnormal development costs including land contamination; D) where existing use value creates a viability challenge (Polaris House being the main example); E) where heritage is a constraint (the conservation area is shown below); F) where there is likely a need to limit building heights to five or six storeys on viability grounds given new fire safety regulations; G) where landowners wish additional profit margin to reflect risks; H) where piecemeal applications risk undermining strategy; I) where there is a need to consider retaining certain onsite uses; and J) where loss of car parking will require further consideration.
- 5.4.18. Overall, given the discussion above (including broad strategy discussion in Section 5.2), there is no basis for questioning the supply figure from the town centre (4,347 homes in the plan period); however, there is a need to acknowledge and factor-in delivery risk (with a view to ensuring a plan that delivers on the committed housing requirement, as discussed). Specifically, this means ensuring that there is a robust supply headroom, i.e. a total supply in excess of the committed housing requirement, particularly in the early years of the plan period. This is a matter discussed further below.
- 5.4.19. In **conclusion**, there is one reasonable growth scenario, but there is a need for ongoing scrutiny of the delivery trajectory and implications for supply headroom.

Figure 5.9: Site allocations in the town centre / central area (SDA01)



The wider urban area

- 5.4.20. The four Sustainable Development Areas across the wider urban area have already been introduced above. Three of the four SDAs are 'suitable' in the SHELAA, although one of them (Windmill Hill) is rated as potentially suitable.
- 5.4.21. Beginning with **Pipers Way** (SDA02; 883 homes in the plan period), there are four component sites, of which one is a new site since 2025, namely PW01 (Marlborough Park). This is a greenfield site at the edge of the urban area, but it is not accessible open space, and there is some containment by built form and landscaping to the south. The other three sites are broadly unchanged but one of the sites (Former Wroughton Park and Ride) is now expected to deliver partly beyond the plan period. Pipers Way was broadly supported within the Interim SA Report (2025) and that remains the case at the current time. There are good links to the town centre and the SDA is located on an identified transit corridor linking to Wroughton – suggesting potential for investment – , although Wroughton is now proposed for lower growth relative to the 2025.
- 5.4.22. The other SDA retained from 2025 is **Marlow Avenue** (SDA03), but the situation has evolved significantly such that additional homes over-and-above those with permission will be delivered *beyond the plan period* (500 homes are assumed).¹⁵ The plan document explains: *"Swindon Borough Council... have led engagement sessions and public consultation events to explore options for the area. The outcome of this was the Marlowe Avenue Renewal Area Masterplan Vision and Design Guide (2024) which was approved by the Cabinet on 13th March 2024. Policy SDA03 seeks to ensure that emerging development in Marlowe Avenue is consistent with the masterplan."*
- 5.4.23. The final two urban SDAs are new since 2025, and have been introduced above.
- 5.4.24. Beginning with **Windmill Hill** (SDA04), this is a functioning employment area located at the western edge of Swindon abutting residential to the east and employment commercial uses to the south. It is very well-linked to the M4 which indicates suitability for employment, but the majority landowner submitted a representation at the Regulation 18 stage stating that they *"lease the buildings to a range of occupiers but demand has dwindled over recent years and some of the buildings are nearing the end of their commercial life."* The landowner stated a proposal to: *"redevelop the site to create a new sustainable mixed-use neighbourhood of around 600 homes, while retaining some of the more modern office buildings, the children's nursery and the windmill. The proposal is to set new development within the established green infrastructure and transport infrastructure framework on site."* The Council broadly supports this vision, including as it aligns with the new focus on attracting companies to the town centre. The intention is that existing occupiers will be attracted to relocate to the town centre, although timing is potentially a risk, given that delivery of grade A office space in the town centre will largely be in the middle and latter part of the plan period. In turn, it is important to note that Windmill Hill is expected to begin delivering only in 2037/38, with 550 homes delivered in the plan period and then a further 50 homes beyond 2043.
- 5.4.25. Finally, **Gateway North** (SDA05) has been introduced above as a site in two parts, namely: A) a northern part where there is a Homes England planning application for 159 homes; and B) a southern part occupied by Vygon, who area longstanding and important local employer. The planning application has faced objections from National Highways but these have been resolved over a period of time, as discussed in the Regulation 18 representation received from Homes England. The proposal across the two sites (i.e. across SDA as a whole) is now for 459 homes, which potentially creates further challenges in respect of traffic on the road network including the junction onto the A419, which forms part of the Strategic Road Network (SRN) operated by National Highways. Also, there is a need to factor-in the cumulative impact of traffic generated from significant wider growth from committed sites (most notably Kingsdown) and new proposed allocations at the north east edge of Swindon. The Regulation 18

¹⁵ In 2025 the proposal was to deliver 976 homes over-and-above permission within the plan period, with the Interim SA Report explaining: *"A challenge relates to delivering an overall vision recognising that parts of the site have recently been redeveloped, elsewhere there is planning permission and elsewhere applications are well-progressed."*

representation from National Highways began by explaining the following context:

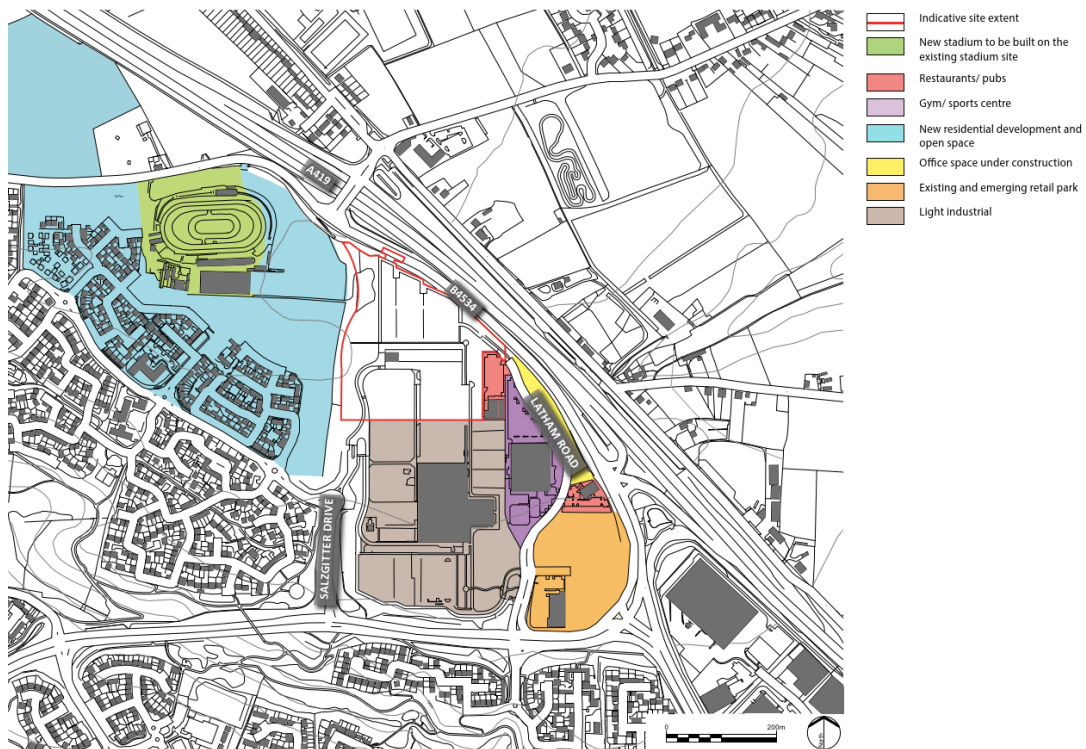
“As identified by National Highways in previous Local Plan preparation work, the current Local Plan allocations, and the associated transport strategy/infrastructure, has not come forward in the way that was envisaged at the time it was adopted. The delivery of strategic allocations, including the New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

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

- 5.4.26. Matters are being explored in detail through a Transport Impact Assessment (TIA) and ongoing liaison with National Highways, but work remains ongoing at the time of writing. The proposed site specific policy refers to the need for a single masterplan for the SDA as a whole with a focus on “a permeable and integrated movement network across the area”, and the policy also states that: *“Development proposals should look to overcome severance at Gateway North by providing direct road and active travel routes to Salzgitter Drive.”* A comprehensive scheme across the area in line with the policy could help to overcome National Highways concerns, including because it is understood that a key issue is the Homes England planning application proposing to gain access from the B4534 Lady Lane; however, there remains uncertainty at the time of writing.
- 5.4.27. With regards to the Vygon site (i.e. the southern part of the site that is not the subject of a pending planning application), whilst this is a landmark manufacturing facility, Vygon has stated an intention to deliver a new c.5,500 sqm HQ facility within the site alongside new homes, and a planning application is anticipated. The existing building is said to be outdated and no longer suitable for its operational needs, and it is said that the new proposed new facility would *“provide a modern, efficient and sustainable base for Vygon’s UK operations, including storage, processing, research, assembly and distribution activities, helping secure the company’s long-term future in Swindon.”*
- 5.4.28. Overall, on the one hand this is a challenging area for growth in terms of mitigating highways impacts, and there is also a case for retaining the existing employment land designations noting the major existing industrial area adjacent to the south east. However, on the other hand, residential can lead to reduced concerns in transport terms relative to employment land, this is a suitable location for residential in many respects and the proposal is to deliver a new modern Vygon facility in the south of the site thereby consolidating the major employment area at this north east edge of Swindon. Also, and importantly, the SDA as a whole can deliver early in the plan period and, indeed, the Homes England site is expected to deliver 75 homes in the first five years.
- 5.4.29. Figure 5.10 is taken from the Homes England planning application and shows the planning application site in the context of: the B4534 to the north; existing commercial (etc) uses to the south east, and then the industrial area beyond; the Vygon site to the south (‘light industrial’); and Salzgitter Drive / Blunsdon St Andrew to the west.
- 5.4.30. In **conclusion**, there is only one reasonable growth scenario, given the importance of making best use of available land within the urban area. At Pipers Way the new proposed greenfield allocation is considered to be strongly performing such that there is no need to test scenarios whereby it is not allocated. Windmill Hill is less well located in transport terms, but redevelopment nonetheless aligns with the spatial strategy. Northern Gateway is then a challenge growth area that requires ongoing scrutiny (although there may be greater confidence regarding proposals following the TIA), but it is difficult to suggest that continuing to designate the land for employment is a reasonable alternative, given the spatial strategy and established needs. Also, Northern Gateway has the benefit of being able to deliver new homes early in the plan period.

N.B. to be clear, where the conclusion is that there is no need to test scenarios whereby any given proposed allocation is not allocated, this amounts to a conclusion that the site can reasonably be taken forward to the RA growth scenarios as a ‘constant’.

Figure 5.10: A figure from the Homes England planning application



Northern urban edge

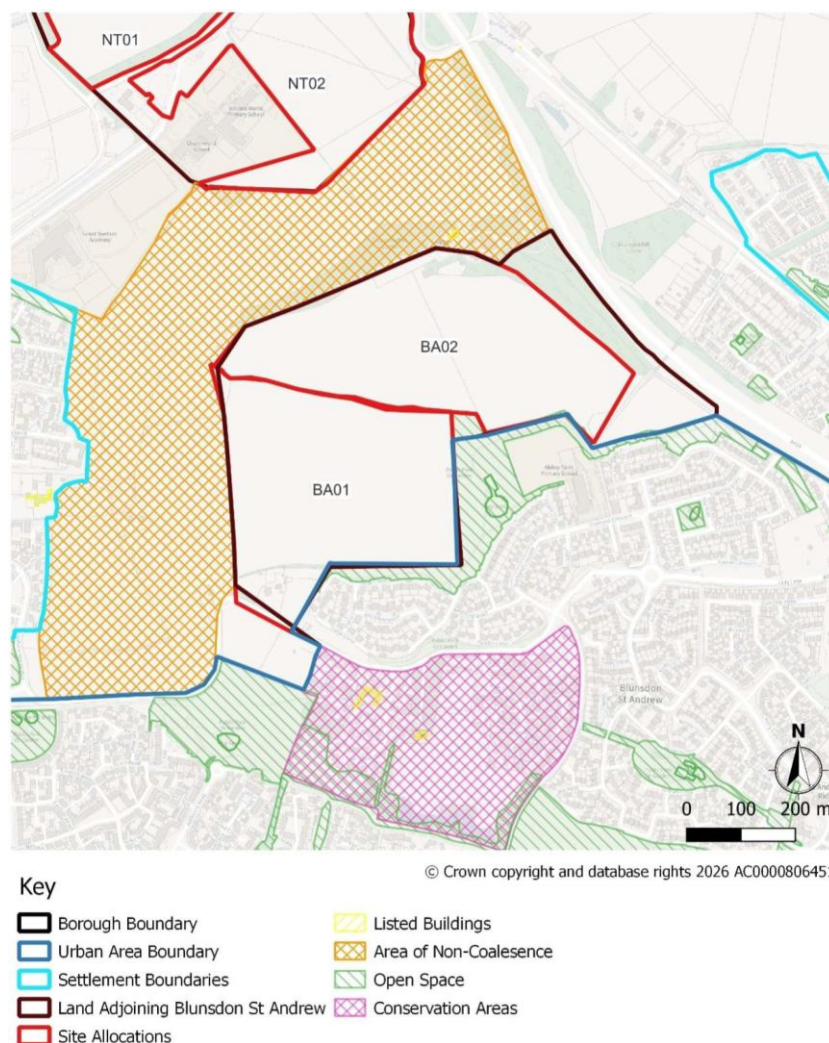
- 5.4.31. As discussed, this area has been the primary focus of growth over recent years and decades, linked by the construction of the A4198 dual carriageway in the early 2000s. Tadpole Garden Village is the most recent development and, as discussed, there is a need to carefully consider further growth in transport terms given orbital road links to the strategic road network but relatively poor radial links to the town centre.
- 5.4.32. There are two proposed SDAs here, both of which are SHELAA potentially suitable:
- **North Tadpole** (SDA09; 600 homes) – is challenging in transport terms, but proposals are broadly unchanged from 2025 at which time it was judged to be a suitably strongly performing site such that, given the strategic context, it was held constant across the RA growth scenarios. The SDA benefits strongly from a location adjacent to new strategic infrastructure delivered alongside Tadpole Garden Village, including a secondary school, a primary school and a health centre. Also, a benefit is limited environmental sensitivity including in landscape terms, as this is low lying land in proximity to the A419. However, these sites do not link very well to Tadpole Garden Village to the west given an intervening solar farm, nor to Blunsdon St Andrew to the south given an intervening hill. Road links onto the A419 (see discussion above regarding National Highways concerns) are currently challenging, but there is an opportunity to connect North Tadpole directly with the A419 through a new junction (left-in/left-out) onto the A419 and to strengthen pedestrian and cycling connections to Broad Blunsdon. It is partly Council owned land, which should assist, and the SDA has the potential to deliver relatively early in the plan period. Finally, an important consideration is delivering a Suitable Alternative Natural Greenspace (SANG) to mitigate recreational impacts on North Meadow SAC at Cricklade.¹⁶ Overall, as per

¹⁶ In respect of SANG, the Interim SA Report (2025) explained: “This imposes an additional cost on the developers with implications for development viability / ability to deliver on wider policy objectives, but the sites should be well-placed to deliver SANG given the land that is available.” Natural England then responded to the consultation stating: “Given the scale of

2025 this site can reasonably be held constant across the RA growth scenarios but requires ongoing scrutiny with respect to transport and SANG issues/challenges.

- **Land adjoining Blunsdon St. Andrew (SDA10; 760 homes)** – this comprises two adjacent sites and both were omission sites in 2025 (i.e. not proposed allocations). However, it was identified as a stronger performing omission site such that the option of c.500 homes was taken forward to the RA growth scenarios.¹⁷ On the basis of further work it is now established that there is the potential for a comprehensive scheme involving 760 homes. However, there are challenges relating to transport, in that: A) as per SDA09 discussed above this is the northern edge of Swindon, with the town centre c.6km to the south; and B) this SDA would access the A419 via the B4534 Lady Lane, which has been discussed above as a key concern of National Highways, given recent growth and also given Northern Gateway (SDA05, discussed above). Landscape is also an issue given this is raised land of the Mid Vale Ridge, but the proposal is to leave steeply sloping land down to Tadpole Garden Village and SDA09 undeveloped thereby creating a coherent transition between these areas. Also, a challenge relates to a pending planning application for 410 homes within the western part of the site (CA01 in Figure 5.11), but a corollary is that this part of the site is anticipated to begin delivering in year 5 of the plan period. Overall, this remains a challenging site such that it is taken forward to the RA growth scenarios as a variable.

Figure 5.11: SDA10 also showing the south of SDA09 and the east of Tadpole GV



development... and its proximity to North Meadow SAC... the allocation will require the provision of a SANG... and the location of the SANG identified on a concept plan. We agreed area of SANG must be established early in the site plan so that it is available prior to occupation." The latest situation is that the SDA policy states a need to mitigate impacts to the SAC in line with the agreed Mitigation Strategy but does not specifically require an onsite SANG.

¹⁷ The Interim SA Report noted that Site BA01 is the subject of a pending planning application for 410 homes but assumed 500 homes on the basis that: "... there appears to be a clear need to ensure a focus on securing comprehensive growth in this area, i.e. with a view to avoiding sub-optimal piecemeal growth."

- 5.4.33. Having discussed the proposed allocations, the final question is whether there are any **omission sites** that reasonably need to be taken forward to the RA growth scenarios.
- 5.4.34. Key considerations are as follows:¹⁸
- Much of the remaining area of land between the Swindon (i.e. Tadpole Garden Village and proposed allocation SDA09) and the River Ray is available for development.
 - However, land to the north of Tadpole Garden Village is judged unsuitable in the SHELAA (this is Council owned land, and includes a solar farm).
 - Land to the north of SDA09 is in the control of Hallam Land, who are promoting the northern part of SDA09, such that there is a need to avoid the risk of sub-optimal development creep, although this land might feasibly be considered for SANG.
 - There is also an area of land that is not known to be available, and overall there is no clear case for further large-scale strategic expansion of Swindon to the north at the current time, with no proposals (concept masterplans etc) having been submitted.
 - However, this is a matter for ongoing consideration, with a view to comprehensive infrastructure-led growth, e.g. to deliver major transport infrastructure and SANG. The River Ray could ultimately form a logical northern boundary to Swindon, thereby maintaining a robust gap to Cricklade, and there is a need to recall the context of Cotswold District being a constrained area where providing for needs is challenging.¹⁹
- 5.4.35. In **conclusion**, there are two growth scenarios for this sub-area:
- Scenario 1 – the proposed submission approach.
 - Scenario 2 – Scenario 1 minus SDA10

Northeast urban edge

- 5.4.36. This area comprises Kingdown, which as discussed is an existing committed strategic urban extension, and the large village of Broad Blunsdon. There are two SDAs here and proposals are broadly unchanged from the Regulation 18 stage in 2025.
- 5.4.37. Beginning with **Kingsdown** (SDA08), latest understanding is that it can deliver 1,489 homes in the plan period and up to 252 homes beyond 2043. This compares to an allocation for 1,650 homes in the adopted plan. The great majority has a resolution to grant planning permission subject to S106 and accordingly is rated suitable in the SHELAA, and then KSD01 is an adjacent potentially suitable site for 64 homes that comprises a plant nursery (the Interim SA Report did not flag any concerns).
- 5.4.38. The Kingsdown Masterplan involves two ‘villages’ on raised land at the northern and southern extents of the SDA, separated by a valley / stream corridor proposed for parkland, and the SDA will link to the existing Kingsdown neighbourhood in Swindon, where there is a secondary school. The A419 is a barrier, but the proposal is for a new bridge connecting to Arkwright Road (at the edge of an industrial area). The new development will deliver a three form entry primary school and there will be a strategic buffer to maintain a landscape gap to Blunsdon St Andrews to the north.
- 5.4.39. Transport is a key issue, with the plan document explaining: *“The site benefits from existing access points from Turnpike Road (B4019) and Kingsdown Road and Highworth Road via the A419. However, substantial supporting infrastructure will be required to ensure it is well connected and served by multiple access points.”* There is also a requirement for improvements to the B4534 Lady Lane, which has been discussed

¹⁸ There is also one small omission site adjacent to Blunsdon St Andrews / Abbey Farm and Site BA01), namely Site s0374. This is potentially suitable in the SHELAA but is currently the subject of a refused planning application with an ongoing appeal (38 homes). The site is notably proposed to deliver high energy efficiency housing (Passivhaus), but this is a raised location in the landscape and serves to further highlight the importance of taking a comprehensive approach to further growth in this area.

¹⁹ The Interim SA Report emphasised the importance of avoiding ongoing sub-optimal piecemeal expansion / sprawl to the north of Swindon, with resulting issues and opportunities missed, including in terms of transport infrastructure. It stated the importance of *“ensuring a comprehensive approach to growth that leverages maximum planning gain and considers the northern expansion of Swindon with a strategic / long term perspective. There is a need to recognise not only challenges around linking to the town centre to the south, but also sensitivities to the north namely the River Ray and the River Thames.”*

above as a key concern of National Highways.

- 5.4.40. Overall, whilst there remain uncertainties around the cumulative effects of growth to the north and north east of Swindon ahead of the Transport Impact Assessment (TIA), this SDA can clearly be taken forward to the RA growth scenarios as a constant.
- 5.4.41. Moving on to **Broad Blunsdon** (SDA13), there is a cluster of three sites to the south of the village, and then one site to the east of the village. All are potentially suitable in the SHELAA, but proposals are broadly unchanged from 2025. The cluster of sites to the south are proposed to deliver 245 homes (compared to 230 homes in 2025),²⁰ and then the site to the east is proposed to deliver 100 homes (compared to 115 homes in 2025).²¹ Three are the subject of pending planning applications and another is at the pre-application stage (BB02), leaving only BB05, which is proposed for only 17 homes. Overall, these are considered to be strongly relatively strongly performing sites such that they can be taken forward to the RA growth scenarios as a constant (as per 2025).
- 5.4.42. Having discussed the proposed allocations, the final question is whether there are any **omission sites** that reasonably need to be taken forward to the RA growth scenarios.
- 5.4.43. In short, virtually all land surrounding Broad Blunsdon and Kingsdown is available for development and most of the omission sites in question are identified as potentially suitable in the SHELAA (in contrast to 2025, when virtually all sites were unsuitable, with the new ratings primarily on account of updated landscape sensitivity evidence), but there is considered to be very limited case for additional / higher growth in this area. Transport is a primary consideration, given the key challenge of mitigating the impacts of strategic growth to the north and north east of Swindon on the highways network (alongside supporting bus services and active travel routes, in line with a vision-led approach to transport planning), as has been discussed above.²² Around Kingsdown there are options for small 'bolt-ons', and there is also feasibly the option of major expansion of the SDA to the east, but there is a need to avoid undermining detailed work that has been completed, and remains ongoing, in respect of the committed site.²³ Around Broad Blunsdon there are opportunities for additional extensions, but even modest additional growth could create a challenge in terms of highways mitigation, and there is limited strategic case for additional growth at / around the village, including given the stated aim of preserving its rural Cotswolds border village character.²⁴ There are also sites being promoted that would involve large scale extension to the north, but any such options are considered to perform poorly, given the transport challenges but also in landscape terms given the Mid Vale Ridge topography.²⁵
- 5.4.44. In **conclusion**, there is only one reasonable growth scenario for this sub-area. Moving forward, and as per the conclusion previously reached in the Interim SA Report (2025), it

²⁰ The Interim SA Report stated: "These sites are well located in transport terms and will help to link Broad Blunsdon to the southern Kingsdown 'village'. However, there is a need to question whether remaining land between Broad Blunsdon and Kingsdown will come under development pressure in the near future, notwithstanding: A) the fact that this land is designated as a "Non-coalescence Area"; B) the green infrastructure role of this land linking to the aforementioned central Kingsdown parkland (including noting a public footpath); C) the land has not been promoted as available; and D) a recent major water pipeline."

²¹ The Interim SA Report stated: "Land at Sams Lane (115 homes) – is located on the edge of Broad Blunsdon and would extend the village to the east. There is a pending planning application, and it would represent phase two of a recently delivered scheme adjacent to the north, with it clearly being unfortunate that the two sites could not be delivered together, with a view to a comprehensive scheme and with a view to maximising benefits."

²² The Interim SA Report stated: "... there is considered to be a weak strategic case for further growth... given the extent of committed growth alongside growth from the new proposed allocations discussed above (also noting recent growth)."

²³ The Interim SA Report stated: "There is a clear need to deliver on the established masterplan, which is carefully considered including from a perspective of respecting the Mid Vale Ridge topography... There is a need to consider the risk of 'sprawl' along the B4019 to Highworth."

²⁴ The Interim SA Report stated: "... there is a pending planning application for land to the east of the Sams Lane site discussed above. On the one hand this could take Broad Blunsdon to a logical extent, in that it would complete the expansion of the village across the raised land with which it is characteristically associated and would ensure a rounded settlement edge if Broad Blunsdon were to be considered a single settlement in conjunction with Kingsdown. However, on the other hand, there are clear historic environment and landscape sensitivities. Specifically, at the northern extent of this site is Burytown Lane, which an important walking route linking the village conservation area to a Hillfort Scheduled monument, from which there are extensive and important views north across the vale towards the Thames. Views are discussed in the Neighbourhood Plan, and a footpath through the site is also noted."

²⁵ The Interim SA Report stated: "... most of the land north of the village is available.... However, this area is poorly connected in transport terms, and there are clear sensitivities given: A) the Broad Blunsdon conservation area and the scheduled monument; and B) the relationship between Broad Blunsdon and Highworth as raised villages of the Mid Vale Ridge and the Vale landscape to the north."

will be important to ensure a strategic approach to growth in this area with a long-term perspective in order to avoid issues and maximise benefits / leverage planning gain.

Figure 5.12: SDA13; also the north of SDA08 and the north of SDA05

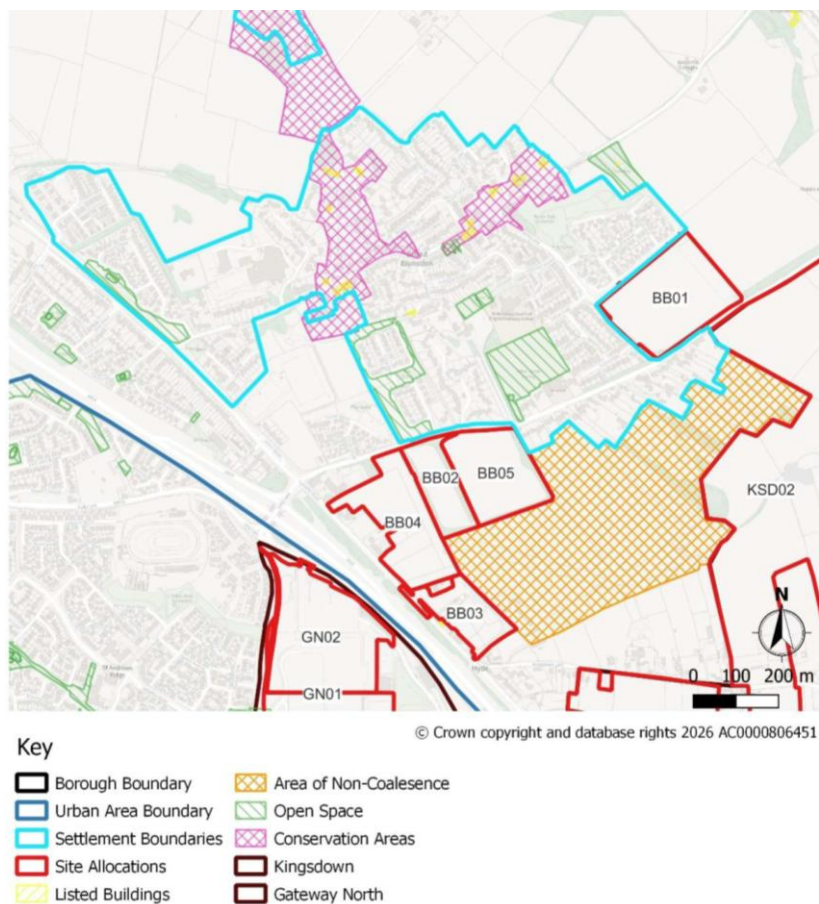
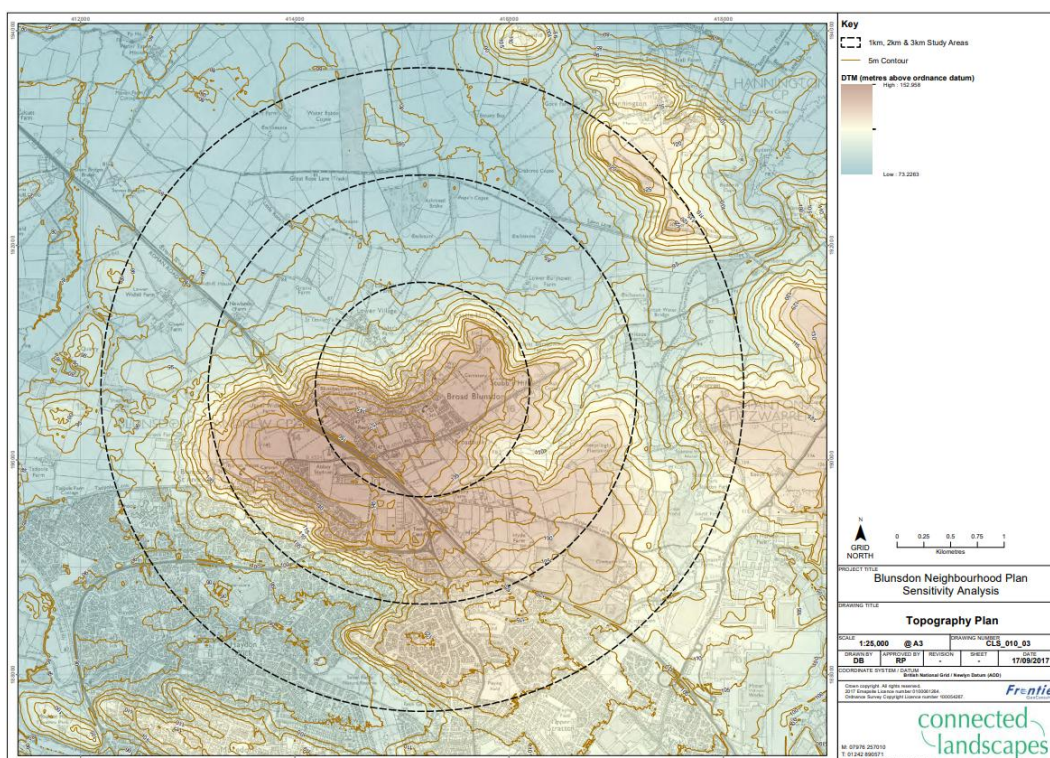


Figure 5.13: Topography in the Blunsdons area sourced from the Blunsdon East NP evidence base; N.B. does not show recent development inc. Tadpole GV & Abbey Farm



Eastern urban edge

- 5.4.45. The focus here is on successfully delivering **New Eastern Villages** (NEV; SDA07), which is a key existing allocation that has faced major delivery challenges. Much detailed work has gone into bringing forward NEV over many years, and there is no case for calling this work into question for the purposes of defining growth scenarios.

- 5.4.46. The current plan document explains:

“The New Eastern Villages Sustainable Development Area forms a strategic extension to the east of Swindon. It consists of approximately 724 hectares, extending from the A419 to the east to where the River Cole meets the A420 in the west, and from South Marston in the north to Foxbridge Farm in the south.

The NEV was first identified in the Swindon Joint Strategy (2005) and featured in previous drafts of the Local Plan, including the emerging Core Strategy as the Eastern Development Area (EDA). The NEV was later allocated in the adopted Swindon Local Plan 2026 as a strategic site allocation for up to 8,000 new homes.

The NEV will comprise a series of interconnected villages, namely Redlands, Lotmead, Foxbridge, Great Stall, Rowborough, and the expansion of South Marston. Much of these sites have been granted outline planning permission with some parcels benefitting from Reserved Matters approval and currently being built out.

Policy SDA07 allocates additional small-scale sites located between development parcels or provide minor extensions to existing development areas.

It is essential that the NEV is supported by substantial infrastructure, including highway schemes to enable nearby roads and junctions to cope with the extra traffic created. Some highway schemes have already been delivered since the adoption of the Swindon Local Plan 2026, including improvements to the White Hart, Gablecross, and Nythe junctions, the Piccadilly and Greenbridge roundabouts, and the delivery of a new South Marston cycle/ footbridge. The delivery of the Southern Connector Road, a major strategic project that will link the New Eastern Villages with Commonhead roundabout and the A419, is in progress.”

The NEV will contribute significantly to the Borough’s housing land supply and will be expected to deliver 8,875 new homes.”

- 5.4.47. NEV is expected to deliver 8,597 homes in the plan period including 3,537 homes in the crucially important first five years, such that it is centrally important to the local plan and there is a need to support delivery / avoid any measures that would affect delivery. It is also centrally important to the overall growth strategy including from an employment land perspective, as discussed in Section 5.2. There is an adopted Masterplan and there are five adopted Supplementary Planning Documents (SPDs).

- 5.4.48. Key infrastructure includes:

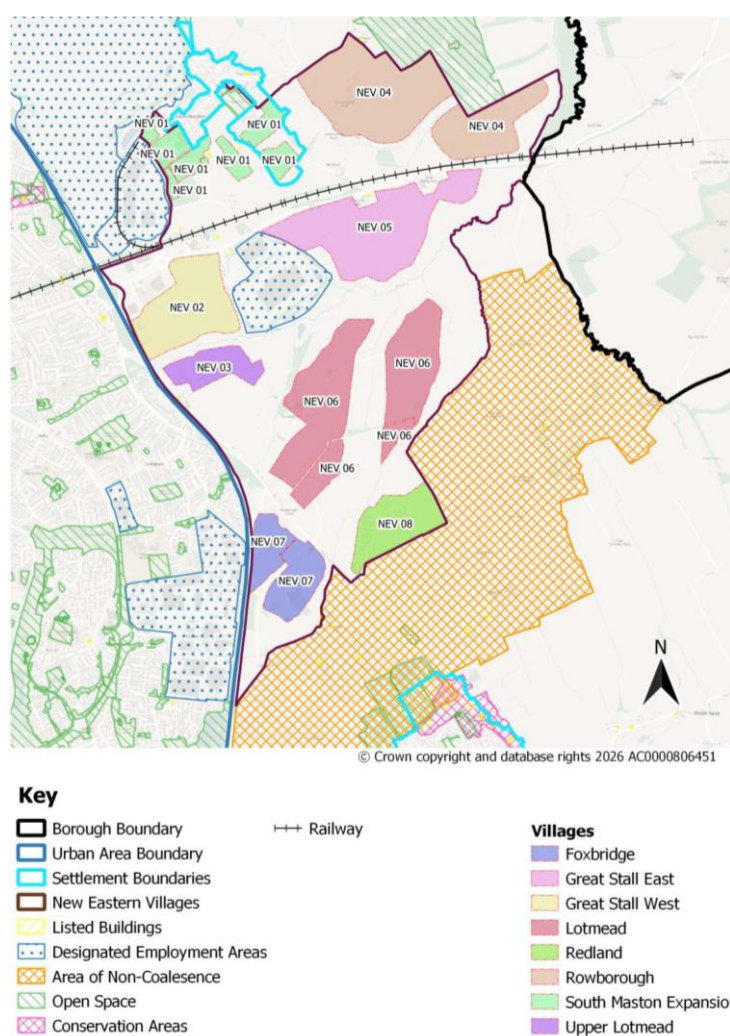
- The Southern Connector Road;
- Park and Ride provision at Great Stall East and measures to prioritise bus and active travel along the A420;
- Primary and secondary school provision;
- Great Stall Bridge and Express Bus Network, including sustainable transport links and a new bridge link across the A419;
- Highway links between development islands, including the construction of highways to secure links between New Eastern Village parcels;
- An additional primary healthcare facility at Great Stall West; and
- New indoor sports and leisure facilities at Great Stall West.

- 5.4.49. As per other sites discussed above there is also a need to deliver SANG, and flood risk mitigation has been and remains a key issue for NEV, as this is a low-lying landscape interspersed by a network of flood risk zones (this creates separation between the

proposed villages but leads to additional cost/challenge in terms of transport links).

- 5.4.50. The Interim SA Report (2025) discussed the possibility of supporting significant additional growth at NEV, but this is not a realistic option at this point in the process.²⁶ In particular, there are SHELAA potentially suitable sites that would expand NEV further to the east, but it is not known to be the case that this would assist with viability / delivery, and a concern would be ongoing sprawl east across the Vale of White Horse.
- 5.4.51. Finally, the large villages of South Marston and at Wanborough are discussed further below, but a key point to note here is that all omission sites at the villages are unsuitable in the SHELAA, and there is limited strategic case for growth at either village, given the proximity of NEV and, in the case of Wanborough, proximity of the National Landscape.
- 5.4.52. In **conclusion**, there is only one reasonable growth scenario for this sub-area. There is a clear need to acknowledge ongoing delivery risks, but there is increasingly confidence regarding the delivery trajectory on the basis of recent and ongoing detailed work.

Figure 5.14: New Eastern Villages (SDA07)



²⁶ The Interim SA Report stated: "... in the long term the possibility of further growth in this area could be an option to consider, e.g. with a view to transformational new transport infrastructure and possibly even to include a new train station and recognising the importance of links to Oxford. However, the current focus must be on delivering NEV, and further growth could be something to consider through a future sub-regional Spatial Development Strategy (SDS) following designation of a Strategic Authority to cover Swindon which, at the time of writing, could either link Swindon to the Thames Valley or to the West of England. With regards to [the possibility of] a station, this would ideally be located centrally within NEV where the line is on level ground (rather than on an embankment or in a cutting) but is very difficult to see how this could now be delivered given the established NEV masterplan. Other considerations are: A) the current northern extent of NEV is Nightingale Wood (not an ancient woodland, but designated public access land) and the River Cole corridor, with this area important from a green/blue infrastructure perspective; B) at the northern extent of South Marston is a Grade I listed church; and C) there is a need to carefully consider expansion of Swindon across the Vale including with a view to avoiding the risk of coalescence with Shrivenham and/or Highworth and also given views from the North Wessex Downs... including from the Ridgeway."

Southern urban edge

- 5.4.53. Pipers Way (SDA02) has already been discussed above, such that the remaining proposed allocation here is **Wichelstowe** (SDA06). This is an existing strategic allocation where the eastern part has now delivered, leaving the western part to deliver in the plan period as SDA06, with much of SDA06 delivered or under construction.

- 5.4.54. The current plan document explains:

“The Wichelstowe Sustainable Development Area (SDA) forms a strategic urban extension to the south of Swindon, covering approximately 310 hectares between the London–Bristol railway line, the former Rushey Platt–Old Town railway and the M4 motorway. The area was first identified through the Swindon Development Appraisal Study (1998), with outline planning permission originally was granted in 2005 for a comprehensively planned, mixed-use community of up to 4,500 dwellings. Development commenced in 2007 and 1,589 homes have been completed to date.

The ongoing delivery of Wichelstowe is supported by strategic infrastructure, including the Wichelstowe Southern Access Road, which provides improved connectivity between the urban area and land to the south of the M4, while helping to reduce pressure on Junction 16 and the wider highway network.

Recent development at Wichelstowe has demonstrated a strong commitment to sustainable travel and high-quality placemaking. Development at Canalside has been supported by a comprehensive Travel Plan, incorporating measures to reduce reliance on private car use such as walking and cycling infrastructure, public transport incentives and behavioural initiatives. This approach has been recognised through national accreditation (Gold Standard Modeshift STARS, 2025), reflecting the site’s emphasis on sustainable transport.

The continued allocation of Wichelstowe through Policy SDA06 will support the delivery of a series of well-designed neighbourhoods centred around high-quality public spaces and supported by sustainable transport networks, community facilities and green infrastructure. The site is expected to deliver a further 1,620 homes over the plan period, contributing significantly to meeting the Borough’s development needs.”

- 5.4.55. Policy SDA06 also explains key infrastructure requirements as follows:

- Improvements to M4 Junction 16, including the Wichelstowe Southern Access/M4 J16 link, M4 J16 slip-road and A3102 junction works;
- Potential Wichelstowe bus gateway;
- A new “three form entry” primary school;
- A new healthcare facility;
- The restoration of the Wilts and Berks canal.

- 5.4.56. Flood mitigation measures are also an important consideration in this area, but there is not a requirement to deliver SANG in this part of the Borough.

- 5.4.57. Wichelstowe is crucially important in terms of housing delivery in the early part of the plan period and, overall, there not known to be any key choices/alternatives to explore. Part of the non-permitted part of SDA06 is proposed for employment land within the adopted Local Plan (Figure 9 in the plan), but there is no clear strategic case for this.

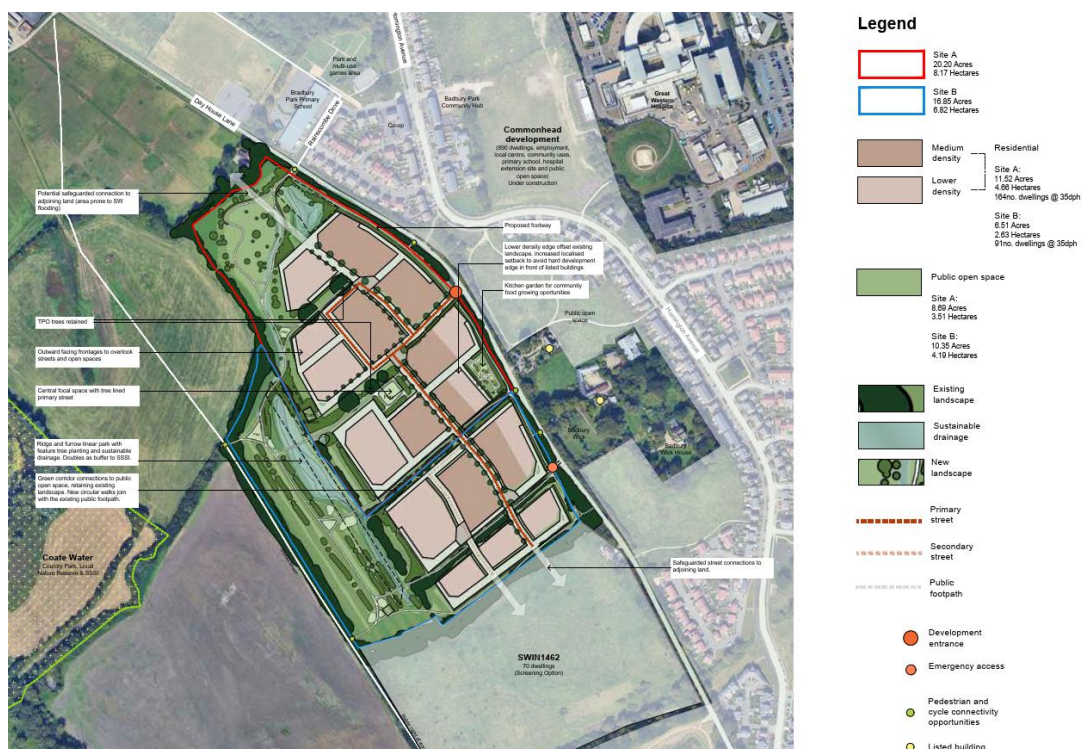
- 5.4.58. Having discussed the proposed allocation, the final question is whether there are any **omission sites** that reasonably need to be taken forward to the RA growth scenarios.

- 5.4.59. In this regard, whilst the Interim SA Report (2025) suggested no sites of note, at this stage there is a reasonable need to consider the option of a strategic urban extension in the east of this sector, and specifically adjacent to the west of Day House Lane. There is a collection of three adjacent ‘potentially suitable’ omission sites, but attention focuses on Site s0455b (Land at Day House Lane), as the other two comprise former landfill.

- 5.4.60. The promoters of Land at Day House Lane have submitted a vision document, and whilst the capacity is not specified it is assumed to be c. 500 homes. The promoters state that there are two landowners suggest delivery in the short to medium term. It would comprise an extension to Badbury Park, which is a new neighbourhood recently delivered / nearing completion following an allocation in the adopted Local Plan.
- 5.4.61. There are clear constraints to growth in this area, particularly on account of proximity to Coate Water SSSI and Country Park (the adopted Local Plan designates this area as 'Coate Water Country Park setting'), but also given an adjacent large scheduled monument (Medieval settlement remains at Badbury Wick) associated with two Grade II listed buildings. This is also landscape sensitivity given proximity to the North Wessex Downs to the south, and also noting long distance views towards Swindon to the north. Finally, this land is likely to comprise grade 1 quality agricultural land.
- 5.4.62. In terms of access, Days House Lane is an unmarked lane that bounds the new community to the east. However, a facilities are within walking distance including an adjacent primary school, and the site promoters state: *"The site will be accessed from Day House Lane via a simple priority junction which will meet all relevant standards, while a package of improvements would be made to Day House Lane to ensure safe and suitable access for all users. Additional pedestrian connections will be provided to Badbury Park to ensure direct and convenient access to the facilities mentioned above."*
- 5.4.63. On balance, there is considered to be a reasonable need to test this option on transport grounds, acknowledging that land here relates well to the urban area and performs reasonably well in terms of accessibility and connectivity, including noting the nearby hospital and good links to the town centre via an identified strategic transit route. This is also in the context of established concerns regarding capacity on the highways network at the north and north east edge of Swindon (and, in turn, the potential for growth to align with vision-led transport planning principles). Furthermore, this site links to junction 15 of the M4, which was recently upgraded (although junction 15 capacity is a matter for ongoing consideration given forthcoming growth along the A149 corridor).
- 5.4.64. The assumption is a 500 homes scheme comprising only Site s0455b (Land at Day House Lane), but there could also be the potential to expand into adjacent land comprising former landfill, with a view to making good use of degraded land. In particular, there could be the possibility of additional growth in Site s0020 adjacent to the south, which is being promoted for 70 homes (with no suggestion of a joint scheme with Land at Day House Lane, to the north). The final site in this cluster is Site s0571 to the west, but in addition to former landfill this site relates less well to the urban edge and is likely more sensitive in terms of Coate Water and National Landscape setting.
- 5.4.65. In **conclusion**, there are two growth scenarios for this sub-area:
- Scenario 1 – the proposed submission approach.
 - Scenario 2 – Scenario 1 plus Land at Day House Lane (500 homes)

Figure 5.15: A view across Land at Day House Lane towards Swindon



Figure 5.16: Site promoter concept masterplan for Land at Day House Lane

West Swindon

- 5.4.66. There are no proposed allocations in this area (other than Windmill Hill, which is within the urban area, discussed above; SDA04), and there is only one HELAA potentially suitable omission site. The SHELAA unsuitable omission sites are mostly cross-border sites located wholly or partly in Wiltshire, and there is limited strategic case for considering these sites, including given relatively poor transport connectivity.
- 5.4.67. With regards to **omission sites**, the previous Interim SA Report stated:
- "... briefly, broad options involve: A) strategic cross-border growth northwest of M4 J16, likely employment-led; B) an extension to a recently delivered scheme at Grange Park (which would encroach upon Lydiard Park Registered Park and Garden); C) a significant extension to Nine Elms, which would erode the gap to Lydiard Millicent (albeit there is an intervening stream corridor); D) an extension to Roughmoor / Common Platt that would not relate well to the settlement edge and appears to perform particularly poorly in transport terms; and E) strategic growth to the northwest (north of Maldon Hill Country Park), where the River Ray corridor is a clear constraint (including noting Haydon Meadow SSSI which is in 'unfavourable declining' condition), albeit transport connectivity here is likely stronger than is the case for land north of Swindon."*
- 5.4.68. With regards to the one SHELAA potentially suitable omission site, this is the site discussed above at point (B), specifically Site s0019b. Whilst it is rated potentially suitable in the SHELAA overall, it is assigned a 'red' rating under the landscape criterion. The site was previously part of a wider scheme refused at appeal in 2011, before the site was revised and a smaller scheme for 73 homes was permitted at appeal (now constructed). The appeal inspector allowed the 73 home explaining that:

"The revised scheme is avowedly an attempt to respond to criticisms that led the Inspector to dismiss the 2011 appeal. In particular, he concluded that the scheme before him would a) '... be a noticeable and significant encroachment into the Lydiard Ridge Landscape Character Area that would undermine its present integrity and value as a rural scene...' (paragraph 21) and b) '... would notably degrade...' the setting of the heritage asset of the RPG (paragraph 32)... The revised scheme seeks broadly to confine the development to the southeast of the Lydiard Ridge, thereby retaining a belt of open land between its north-western edge and the boundary of the RPG, and to

restrict the intervisibility of the proposed development and the RPG..."

- 5.4.69. In **conclusion**, there is only one reasonable growth scenario for this sub-area. It is recognised that there is a need for ongoing discussion with Wiltshire Council regarding long-term growth strategy, including given the challenge of providing for LHN.

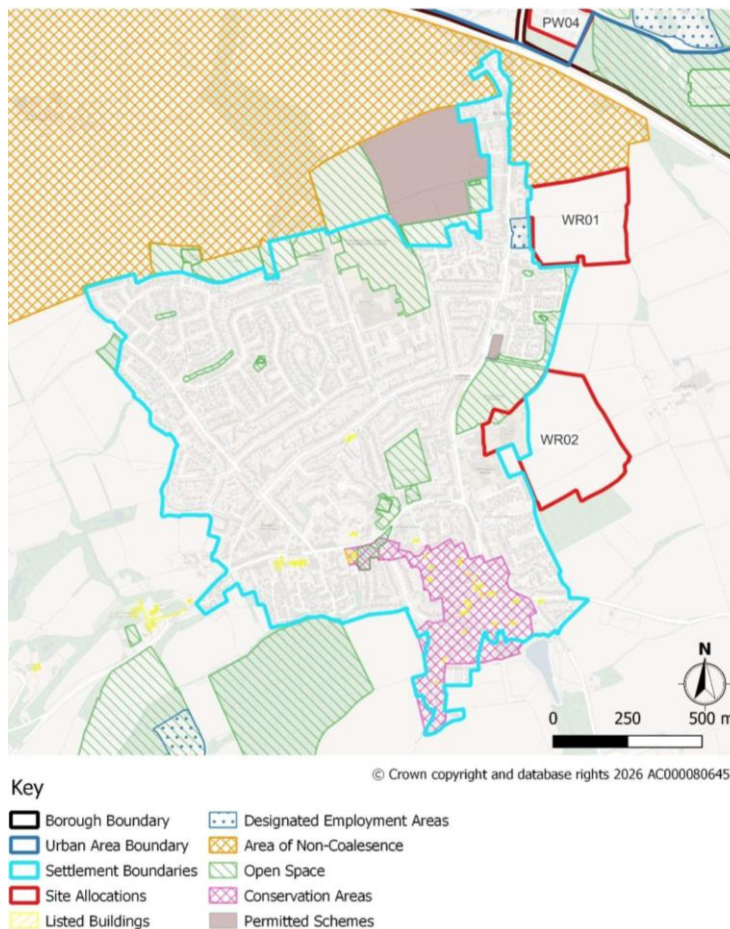
Wroughton

- 5.4.70. The proposal is now to allocate two sites to the **east of Wroughton** for a total of 485 homes, which contrasts to the previous proposal in 2025 to allocate three sites for a total of 856 homes. Additionally, a site to the north of the village was previously proposed for 175 homes in 2025 but is no longer an allocation as it has planning permission (it is a neighbourhood plan allocation, and is notable for mostly comprising former landfill).
- 5.4.71. The previous high growth strategy to the east of Wroughton sought to ensure a comprehensive approach to growth with a view to maximising the benefits and aligning with vision-led transport planning principles,²⁷ given good links to Swindon town centre and the potential for enhancements in combination with growth at Pipers Way. Furthermore, the village benefits from a secondary school, a sixth form and a leisure centre. The Interim SA Report (2025) held the approach to growth constant across the reasonable alternative growth scenarios that were defined at that time.²⁸
- 5.4.72. However, the largest of the proposed allocations from 2025 is now no longer available, with the landowner stating that it is a viable dairy farm. This site was formerly the central site of a cluster of three to the east of the village.
- 5.4.73. The remaining two sites will deliver as stand-alone urban extensions rather than as part of a coordinated approach to growth east of the village, but nonetheless are considered to be relatively strongly performing sites. Both are potentially suitable in the SHELAA, but relate reasonably well to the settlement edge, and the policy requirement is: *"Development should be well integrated with the existing settlement and reflect Wroughton's historic settlement pattern, vernacular architecture and landscape setting, taking a landscape-led approach that reads as a natural continuation of Wroughton."*²⁹ The site to the north (WR01) intersects a flood risk zone, but built form will be concentrated adjacent to the urban edge, away from the flood risk zone. The site to the south (WR02) would partly extend a recently completed scheme, but there is containment by a woodland to the south and what appears to be a reasonable strong field boundary to the east. The plan proposes policy requirements including:
- Development at WR01 should retain existing trees and encourage new trees along the site boundaries. Development is more suitable within the western half of the site, adjacent to existing built form within Wroughton.
 - Development at WR02 should be focused in the south west corner of the site and encourage tree planting along the site boundaries to reduce visual impact on the North Wessex Downs National Landscape.
 - Development proposals should deliver active travel connections to Swindon Town Centre and Wichelstowe... [and] demonstrate how they connect to and support the public transport network, benefitting from [a] strategic position on a key transit corridor.
- 5.4.74. Finally, it is important to note that the site to the north (WR01) is currently the subject of a pending planning application and, accordingly is anticipated to deliver early in the plan period, including with 25 homes delivered in the crucial first five years.

²⁷ The Interim SA Report explained: "There had then been limited growth over a number of years, but recently a series of sites have been permitted at appeal with weight having been given to the Borough's lack of a five year housing land supply."

²⁸ The Interim SA Report stated: "The... three sites are... located to the east of the A4361 and have good potential to come together in a coordinated way in order to deliver a comprehensive scheme that delivers benefits to the village. However, precisely what can be achieved requires further investigation, including through the current consultation, and it will be important to ensure suitably comprehensive growth with a long term perspective, recognising that wider land parcels in this area are available (although there are important constraints to growth, namely the NL and Burderop Wood SSSI)."

²⁹ The plan document also explains: "Wroughton is a Rural Service Centre with a strong local character and identity influenced by its rural setting, key views out to the countryside and its heritage. Policy SDA12 emphasises the need for development at Wroughton to successfully integrate into the existing village and embody the local character."

Figure 5.17: Proposed growth at Wroughton (SDA12)

- 5.4.75. Having discussed the proposed allocations, the final question is whether there are any **omission sites** that reasonably need to be taken forward to the RA growth scenarios.
- 5.4.76. There are four SHELAA potentially suitable sites of note that are located to the north or north west of the village (it can be noted that the historic core of the village is at its southern extent, at the foot of the North Wessex Downs scarp slope, and then the village has expanded north towards Swindon). Taking four sites in turn:
- North west – is affected by flood risk and/or is not well-contained. There is limited case for growth to the west given the village centre and Swindon Road to the east.
 - North – there are two sites here and there could be some potential for additional growth to the north of the village, including noting limited concerns in respect of impacts to the setting of the National Landscape. However, there is a series of significant surface water flood risk zones and again this is not the ideal location for growth in transport terms. There is a case for ensuring a comprehensive approach.
 - North east – the Regulation 18 representation received from the promoter of the current proposed allocation to the north (WR01; 185 homes), stated that the allocation should be extended to the north such that it delivers 500 homes in total along with an additional area of strategic open space to the east (Figure 5.18). The land is in the same ownership as WR01, which suggests the possibility of delivery relatively early in the plan period, but there appears to be an intervening area of land in separate ownership. An expanded scheme for 500 homes would 'complete' the northern expansion of Wroughton as far as the M4, given a flood risk zone to the east. Also, this northern edge of Wroughton is well linked to Swindon. However, development would lead to a linear built form, and would be around 2km from the village centre. Also, and importantly, there is a desire to retain separation between Wroughton and Swindon, with the current plan proposing an Area of Non-Coalescence designation. Overall, whilst there is a case for ensuring a comprehensive approach to growth that

leverages maximum planning gain and avoids the risk of piecemeal expansion in the future, on balance this site is ruled out, i.e. not taken forward to the growth scenarios.

Figure 5.18: Site promoter proposal for an expanded WR01



Highworth

- 5.4.77. Whilst the proposal in 2025 was to allocate only one site for 55 homes, which is an allocation in the recently 'made' Neighbourhood Plan, the proposal now is to additionally allocate two larger sites to the **north of Highworth**, leading to 805 homes in total. Policy SDA11 in the plan document states:

"Land at Highworth will provide a sustainable cluster within the settlement of Highworth, a Rural Service Centre, where it will benefit from existing services and facilities, a distinctive landscape setting, and a cohesive and characterful built form."

- 5.4.78. Taking the two new proposed allocations in turn:

- HW02 (Lead East of Roundhills Mead; 250 homes) – relates reasonably well to the settlement edge, including noting a recently delivered supermarket and a recently permitted site for 90 homes to the west. There is a pending planning application and, importantly, the site is expected to deliver 100 homes in the first five years of the plan. Overall, despite the site previously having been an omission site in 2025 it is now considered reasonable to progress the site to the RA growth scenarios as a constant.
- HW03 (Land at Twelve Oaks Golf Course; 500 homes) – the site comprises a former golf course, which serves as an argument in favour of development. Also, there are reasonable or good bus links, and there is a recent cycle route part of the way into Highworth. Furthermore, the proposal is to deliver 50% green space (including a 2.5km 'park run loop'), and the site promoter proposes *"a central community/retail space located to serve the new neighbourhood but with ease of access to the A361 and passing traffic and incorporating a new mobility hub to prioritise active travel."* However, it does not relate well to the settlement edge, such that the concern is ongoing development creep across the vale landscape north of Highworth (which is a characteristic hill top town of the Mid Vale Ridge). This is in the context of the following proposed policy requirement under SDA11: *"Development should be well integrated with the existing settlement, reflecting Highworth's historic settlement pattern, vernacular architecture and landscape setting. Development on extension sites should take a landscape-led approach that reads as a natural continuation of Highworth."*

Also, the site is also relatively distant from the town centre and secondary school (at a distance of c.1.7km via a hill) and relatively distant from Swindon. Overall, this is considered to be a more challenging site and so, recalling that it was previously an omission site, it is taken forward to the RA growth scenarios as a variable.

Figure 5.19: Proposed growth at Highworth (SDA11)

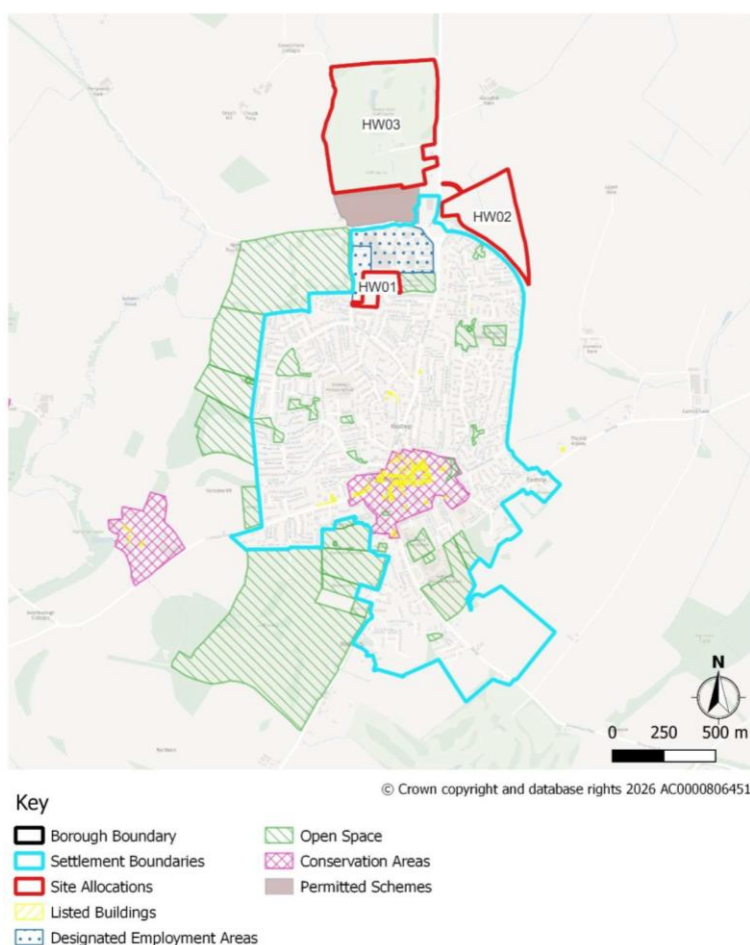


Figure 5.20: Site promoter concept plan for Site HW03



5.4.79. Having discussed the proposed allocations, the final question is whether there are any **omission sites** that reasonably need to be taken forward to the RA growth scenarios.

5.4.80. For context, the Interim SA Report introduced Highworth as follows:

“Highworth has a good local offer but is not as well-connected to Swindon town centre as is the case for Wroughton (albeit there is a good bus service and key employment areas are in relative proximity). Also, Highworth is associated with a characteristic raised location on the Mid Vale Ridge (albeit eroded by late 20th century expansion downhill onto and across the Vale), which creates a challenge in respect of considering potential directions for expansion. Related to this, the conservation area close to the southern extent of the town includes a high density of listed buildings (including one Grade I and five Grade II) and there is a network of scheduled monuments to the east.”*

5.4.81. The Interim SA Report discussed additional potential directions for growth around the town (other than growth to the north) as follows:

- West – the potential for good containment can be envisaged, but there are clear landscape and historic environment sensitivities given the Hampton Conservation Area and with this land the edge of the Mid Vale Ridge (also noting an important footpath).
- East – this is potentially a preferable location for growth in containment and access terms, but not necessarily in transport terms given a risk of traffic through the historic town centre. A clear constraint relates to the adjacent scheduled monuments.
- South east – there is recent and committed piecemeal growth here, including a site permitted for 250 homes in the knowledge that the Borough did not have a 5YHLS. Land here benefits from close proximity to the secondary school, but this is the road corridor to Watchfield and Shrivenham rather than to Swindon (there is no clear link road option). It is not clear that there is any further significant growth opportunity.
- South west – the municipal golf course here closed in 2019. This is Council owned land, accessed by the public, and is not currently available for development. This sector of the town’s edge benefits from proximity to the town centre and secondary school and also relatively good connectivity to Swindon. However, there is a concern regarding ‘sprawl’ along the A361, proximity to the conservation area is a constraint.

5.4.82. At the current time most of the available sites around the edge of Highworth are rated as unsuitable in the SHELAA. There is one potentially suitable SHELAA site to the south west (Site s0547; Land at Hampton Hill) but this is a small site that does not relate well to the settlement edge and is likely subject to a degree of landscape and historic environment constraint. There is also feasibly the possibility of delivering a more strategic scale of growth to the north of the town, including with a view to delivering a local centre, but this is not a clear option at the current time.

5.4.83. In **conclusion**, there are two growth scenarios for this sub-area:

- Scenario 1 – the proposed submission approach.
- Scenario 2 – Scenario 1 plus Land at Day House Lane (500 homes)

Elsewhere across the Borough

5.4.84. Firstly, with regards to the four large villages:

- **Broad Blunsdon** – has been discussed in detail above.
- **South Marston** – has been discussed above as very closely associated with NEV. Whilst there is feasibly the option of growth to the north of the village (away from NEV), this is not a well-connected area and this is an important transition to the countryside.
- **Wanborough** – is notably constrained by the setting of the National Landscape. There are two or three options for modest expansion that might be considered as they relate reasonably well to the village edge, and with a view to boosting , e.g. to boost the robustness of the housing land supply and supporting village vitality, but they would deliver limited benefits to the village beyond new market and affordable housing.

Also, 'Inlands Farm' is a proposal for a new village to the west that would act as a "gateway to the NEV" along the new Southern Connector Road, but this option is considered to perform poorly, and details have not been provided.³⁰ The gap between Wanborough and Swindon is clearly of importance including in the context of the NL.

- **Chisledon** – the Interim SA Report (2025) stated: *"Chisleden – is located within the National Landscape but there are potentially growth options that might be given further consideration, including with a view to delivering targeted benefits to the village and generally maintaining village vitality, recognising that there has been very limited new housing over recent years and decades (the population of the village has actually declined slightly over recent decades). There is a pending planning application for 42 homes to the northwest of the village, but it is not clear that this is the preferable direction for expansion, given the nearby scarp slope (also noting adjacent public rights of way) and the adjacent conservation area."*

There is also a notable large (33 ha) site to the south of the village ('New Road') which does relate reasonably well to the settlement edge. A detailed vision document has been provided, and the proposal is to deliver: a retirement living development up to 150 units; up to 30 custom build/ self-build units; up to 100 market homes with 30% affordable; a 0.5 ha mixed use local centre; a 2.7 ha primary school site with shared community pitches; and a 17 ha parkland. The site is in single ownership and the promoter states that it could deliver early. There is understood to be a village-specific opportunity, but overall there is a lack of a strategic case for major development within the National Landscape. This is also likely best and most versatile agricultural land.

- 5.4.85. The next sector of land to consider is land to the **west of Wroughton** in proximity to M4 J16. This is council owned land and the ELR suggests the possibility of exploring strategic employment land here (and/or elsewhere in proximity to the junction), working in collaboration with Wiltshire Council, and there would be a benefit to delivering new employment land in close proximity to Wichelstowe. However, at this stage there is not considered to be a clear need (ongoing dialogue will need to be maintained with Wiltshire Council as they progress their new Local Plan), and capacity at M4 J16 is understood to be an issue. Also, there is likely National Landscape setting sensitivity. Alternatively this land could feasibly be considered for a new settlement, but there is limited strategic case, including from a vision-led transport planning perspective, and including recognising the close proximity of Wichelstowe to the north.

- 5.4.86. Finally, there is a need to consider the possibility of a new settlement:

- North of Swindon / west of the A419 – this area has already been discussed above, in the context of the proposed North Tadpole SDA.
- North of Swindon / east of the A419 – large areas of land have been promoted as available, including adjacent to the north of Broad Blunsdon (discussed above), but there are no detailed proposals. Proximity to Cricklade is a constraint (including North Meadow SAC), and there would be a need for a major new junction onto the A419 (the current proposal in respect of North Tadpole is for a left-in left-out partial junction).
- Between Broad Blunsdon and Highworth (north of the B4019) – a new settlement here is being actively promoted known as Lower Burytown Farm. See discussion below.
- North of South Marston (south of the A361) – this is raised landscape and the gap to Highworth. Strategic transport upgrades could be envisaged, as well as green infrastructure enhancements, and major employment is adjacent. However, proximity to NEV is a major issue, also South Marston. There are no detailed proposals.

- 5.4.87. Focusing on Lower Burytown Farm, this is a low-lying area of land, associated with the Share Ditch and its tributary streams, between the raised land of Broad Blunsdon to the

³⁰ High level information is provided at: <https://www.inlandsfarm.co.uk/>. The site was previously proposed for a science park but the proposal was refused by the Council and then at appeal in 2022 (see decision [here](#)), with the Inspector notably stating: "On that overall basis, the site is much more than 'mere countryside', in my view, and it does have characteristics that take it 'out of the ordinary'. To my mind, the appeal site should be considered to be a 'valued landscape'."

west and Hannington / Highworth to the east. This suggests a degree of logic, although the corollary is a degree of flood risk and vies across the land from surrounding high ground, most notably Castle Hill (scheduled monument) at the edge of Broad Blunsdon.

- 5.4.88. The proposal is for up to 4,000 homes to include primary schools and other community infrastructure although there is likely no potential to deliver a secondary school. The transport case is weak; however, a new settlement would deliver in the longer term, potentially providing time to deliver required upgrades, including in respect of the challenging approaches to / junctions onto the A419 (where, as discussed above, there are significant challenges as a result of recent, committed and proposed growth to the north and north east of Swindon). As well as heritage constraint there is also a degree of biodiversity constraint, given a network of copses and field boundaries, although impacts could be avoided / mitigated through masterplanning, alongside measures to avoid surface water flood zones. It could be that an appropriate scale of growth is lower than 4,000 homes, with a view to a scheme that minimises impacts, including by focusing on lower lying land (outside flood zones).
- 5.4.89. Overall, whilst there is a clear case for ruling out this new settlement on the grounds that it does not align with the spatial strategy including from a vision-led transport perspective, there is a case for testing a new settlement as a long-term growth option, i.e. as a scheme that would begin to deliver within the plan period but then likely primarily deliver beyond the plan period. As part of this, there is a need to consider proximity to Cotswold District where, as discussed, there are clearly challenges in respect of providing for housing needs. It is recognised that a future Spatial Development Strategy (SDS), potentially for the Thames Valley sub-region, will be an appropriate forum to consider long-term new settlement options. However, on balance it is considered reasonable to test the option for the purposes of the current Local Plan.
- 5.4.90. In **conclusion**, there are two growth scenarios for this sub-area:
- Scenario 1 – the proposed submission approach (nil allocations)
 - Scenario 2 – allocation of a new settlement (up to 4,000 homes in the long term)

Employment land

- 5.4.91. As discussed in Section 5.2, in headline quantitative terms there is a need for new office floorspace but not new industrial land but sitting beneath the headline figures are a range of detailed ('qualitative') matters for ongoing consideration.
- 5.4.92. In respect of new industrial land, the proposed allocations have been introduced in Section 5.2, plus there is policy support for intensification of existing employment sites. There are no omission sites reasonably in contention for allocation, but there remains a need for ongoing scrutiny of the proposal to remove the employment land designation from 'Northern Gateway' and support residential-led redevelopment (to include a new purpose-built facility for Vygon).
- 5.4.93. In respect of office floorspace the situation is more complicated. On the one hand the proposal is to support residential led redevelopment of select office sites leading to a loss of floorspace over-and-above that which factored into the ELR. However, on the other hand, the proposals is to focus on the town centre meaning floorspace delivered on relatively small sites, thereby reducing the need for land in comparison to the ELR calculations. As discussed, there is also a need to factor-in timing of delivery and delivery risk in the town centre. Overall, there is broad support for the proposed strategy, and there are no omission sites reasonably in contention for allocation, but there is a need for ongoing scrutiny of the new proposal (Regulation 19) for residential-led redevelopment of Windmill Hill business park, given its good links to the M4.³¹

³¹ The conclusion within the Interim SA Report was: "Overall, whilst there will be a clear need to revisit the matter of employment land supply subsequent to the current consultation, to include considering the possibility of new greenfield allocations (both in respect of industrial land and office floorspace), at the current time there are no headline omission site options to explore in detail. One thing to highlight is the possibility of a research & development park close to an M4 junction. There is support for testing the preferred strategy through the consultation and then considering potential revisions to the strategy in light of consultation responses received."

- 5.4.94. In **conclusion**, there is one reasonable growth scenario in respect of employment land.

Gypsy, Traveller and Travelling Showpeople accommodation needs

- 5.4.95. As discussed in Section 5.2, there is a need for 35 new pitches and 19 Travelling Showperson plots, primarily over the early years of the plan period.
- 5.4.96. The proposed supply has evolved since the Regulation 18 stage, as discussed within the Gypsy, Traveller and Travelling Showpeople's Site Selection Methodology Topic Paper. The proposal is now to allocate two sites for Gypsy and Traveller pitches, totalling 35 pitches (one of which will be SBC owned and managed) and one site for 19 Travelling Showpeople plots (which will be SBC owned and managed). As such, the proposal is to provide for needs in full, which amounts to a very proactive approach in the context of many other local plans nationally generating significant unmet need.
- 5.4.97. It is noted that neither of two of the three sites proposed for allocation at the Regulation 18 stage are now proposed for allocation. Also, one of the new proposed allocations was previously proposed for 10 pitches but is now proposed for 18 pitches, and this a rural site and affected by surface water flood risk. Finally, in respect of Travelling Showpeople plots, it is noted that the current site within the Borough (from where some or much of the need presumably arises) is located quite centrally within the urban area.
- 5.4.98. Overall, whilst the suitability and capacity of the proposed allocations is a matter for ongoing scrutiny, but at this stage there is no reason to suggest reasonable alternatives.
- 5.4.99. In **conclusion**, there is one reasonable growth scenario in respect of Gypsy, Traveller and Travelling Showpeople accommodation needs.

Conclusion on scenarios to take forward

- 5.4.100. This section has considered categories of supply – mostly sub-areas – in turn and considered whether the approach to growth should be taken forward to the RA growth scenarios (Section 5.5) as a 'constant' or a 'variable'. In conclusion:
- **Most sub-areas** – the conclusion is that the approach to growth can be taken forward as a 'constant', but in some cases this conclusion is reached 'on balance'. Also, for the town centre sub-area, whilst there is broad or even strong support for the proposed strategy there is a need for ongoing scrutiny of delivery assumptions.
 - **Northern urban edge** – in addition to the proposed submission approach it is reasonable to test a lower growth scenario involving 'non-allocation' of SDA10.
This would involve loss of 795 homes supply
 - **Highworth** – in addition to the proposed submission approach it is reasonable to test a lower growth scenario involving 'non-allocation' of HW03 (Twelve Oaks Golf Course).
This would involve loss of 500 homes supply
 - **Southern urban edge** – in addition to the proposed submission approach it is reasonable to test higher growth involving allocation of Land at Day House Lane.
This would involve addition of c.500 homes supply
 - **New settlement** – the proposed submission approach does not include a new settlement but on balance it is reasonable to test the option (Lower Burytown Farm).
Delivery in the plan period is uncertain but assumed to be 500 homes.
- 5.4.101. In **conclusion**, whilst most sub-areas are taken forward to Section 5.5 as a constant (also employment land supply and supply for GTSS needs), four sub-areas are taken forward as a variable, and in each case there are two scenarios for consideration.

5.5. Reasonable growth scenarios

5.5.1. The final task here, within Section 5 (Defining growth scenarios), is to combine sub-area growth scenarios to form a single set of RA growth scenarios for the Borough.

5.5.2. This is a relatively straightforward task, with the RA growth scenarios as follows:

- Scenario 1 – the proposed submission approach
- Scenario 2 – Scenario 1 minus SDA10 plus Land at Day House Lane
- Scenario 3 – Scenario 1 minus SDA10 plus new settlement
- Scenario 4 – Scenario 1 minus HD03 plus Land at Day House Lane
- Scenario 5 – Scenario 1 minus HD03 plus new settlement
- Scenario 6 – Scenario 1 plus Land at Day House Lane
- Scenario 7 – Scenario 1 plus new settlement

Table 5.1: *The reasonable alternative growth scenarios (constants greyed out)*

Supply component	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7
Completions 25/26	676	676	676	676	676	676	676
Strategic commitments	9597	9597	9597	9597	9597	9597	9597
Non-strategic commitments	1976	1976	1976	1976	1976	1976	1976
Windfall allowance	1190	1190	1190	1190	1190	1190	1190
Non-implementation	-174	-174	-174	-174	-174	-174	-174
Non-committed allocations	11,733	11,438	11,438	11,733	11,733	12,233	12,233
Total supply (2025-2043)	24,998	24,703	24,703	24,998	24,998	25,498	25,498
% above LHN (21,654)	15%	14%	14%	15%	15%	18%	18%

6. Growth scenarios appraisal

6.1. Introduction

6.1.1. The aim here is to appraise the 7 reasonable alternative (RA) growth scenarios introduced above under the SA framework (Section 3). The scenarios are:

- Scenario 1 – the proposed submission approach
- Scenario 2 – Scenario 1 minus SDA13 plus Land at Day House Lane
- Scenario 3 – Scenario 1 minus SDA13 plus new settlement
- Scenario 4 – Scenario 1 minus HD03 plus Land at Day House Lane
- Scenario 5 – Scenario 1 minus HD03 plus new settlement
- Scenario 6 – Scenario 1 plus Land at Day House Lane
- Scenario 7 – Scenario 1 plus new settlement

Methodology

6.1.2. Under each sustainability topic the aim is to: **1)** rank the scenarios in order of performance (with a star indicating best performing); and then **2)** categorise the performance in terms of 'significant effects' using red / amber / light green / green:

- **Red** indicates a significant negative effect
- **Amber** indicates a negative effect of limited or uncertain significance
- **Light green** indicates a positive effect of limited or uncertain significance
- **Green** indicates a significant positive effect
- **No colour** indicates a neutral effect

6.1.3. Within the appraisal discussions there is a particular focus on the 'variables', but the supply components that are a 'constant' feed into conclusions on significant effects.

Assumptions

6.1.4. Key assumptions are as follows:

- The baseline – a key assumption is in respect of the future baseline, i.e. the situation without an adopted plan with a robust land supply, i.e. sufficient to deliver on the housing requirement. Specifically, the assumption is that there would be sub-optimal growth under the presumption in favour of sustainable development (accounting for Policies S3, S4 and S5 in the 2026 version of the NPPF, which applies for the purposes of decision-making). This could potentially involve sub-optimal piecemeal development, including recalling pending and anticipated planning applications.
- Delivery – there is a need to make assumptions regarding what precisely could be delivered by sites, including in terms of use mix, infrastructure and affordable housing. Work on the Infrastructure Delivery Plan and Viability Study remains ongoing at the time of writing, which leads to added uncertainty.

6.2. Accessibility (to community infrastructure)

Scenario 1 Proposed	Scenario 2 - SDA10 + Days Ln	Scenario 3 - SDA10 + Burytown	Scenario 4 - HW03 + Days Ln	Scenario 5 - HW03 + Burytown	Scenario 6 + Days Ln	Scenario 7 + Burytown
=	=	=	=	=	=	=

- 6.2.1. A key consideration is directing growth to locations where there is good access to community infrastructure (with capacity) and supporting growth locations able to deliver new community infrastructure capacity alongside new homes.
- 6.2.2. Taking the variable growth locations in turn:
- SDA10 (Land adjoining Blunsdon St. Andrew) – the SDA comprises two sites and one is currently the subject of a planning application, such that the proposal is not to deliver a primary school and overall there is limited opportunity in terms of new strategic community infrastructure, although there are some transport opportunities. There is however good access to nearby community infrastructure including that recently delivered as part of Tadpole Garden Village. There is a need for ongoing scrutiny of the cumulative effects of growth at the northern edge of Swindon; also, accessibility to the town centre and to Blunsdon St Andrew / Kingsdown (crossing the A419).
 - HW03 (Twelve Oaks Golf Course) – the site proposes to deliver a small neighbourhood centre, but there is a risk of an opportunity being missed in terms of delivering a larger local centre, and potentially even a new primary school. Highworth has a good local offer but this is not very easily accessed from the site. It is also important to note that recent and committed growth is somewhat piecemeal, most notably to the southeast of the town (e.g. comprehensive growth might have explored the possibility of a A361/B4000 link road to the benefit of the schools hub to the north).
 - Days Lane (south east of Swindon) – the site would deliver little new community infrastructure but there is good access to existing community infrastructure. Whilst the assumption is a 500 home scheme there could be an opportunity to deliver a larger comprehensive scheme to include new community infrastructure (but this would involve development of land that comprises former landfill).
 - New settlement (Land at Bury Town) – there would be good potential to deliver new community infrastructure alongside new homes, but it seems unlikely that a scale of growth could be achieved that allows for delivery of a new secondary school. The site would deliver in the longer term allowing time to plan for secondary school capacity.
- 6.2.3. With regards to ‘constant’ elements of the proposed strategy, there is broad support for a focus on growth within and adjacent to the main urban area, and at Wroughton and Broad Blunsdon which are well-linked to the main urban area (and Broad Blunsdon has a good local offer). However, there is uncertainty ahead of confirming matters through an Infrastructure Delivery Plan and Viability Study, and there are ongoing uncertainties regarding the potential to deliver new community infrastructure alongside housing growth in the town centre given land availability and viability constraints.³²
- 6.2.4. In **conclusion**, it is not possible to differentiate between the scenarios with confidence, and a neutral effect is predicted given the uncertainties at this stage. This is notwithstanding numerous positive elements of the strategy, including supporting the existing committed strategic allocations, including on the long-standing vision for NEV.

³² Whilst it can be expected that a high proportion of new town centre residents will be younger people without school age children, it will nonetheless be the case that 8,000 homes will generate a need for new education and childcare capacity alongside wider services/facilities. Accessibility to schools with capacity is an existing issue in the town centre (including accounting for connectivity / permeability challenges) and given locational requirements (e.g. sufficient outdoor space).

6.3. Air quality

Scenario 1 Proposed	Scenario 2 - SDA10 + Days Ln	Scenario 3 - SDA10 + Burytown	Scenario 4 - HW03 + Days Ln	Scenario 5 - HW03 + Burytown	Scenario 6 + Days Ln	Scenario 7 + Burytown
=	=	=	=	=	=	=

- 6.3.1. Whilst car traffic associated with all of the growth scenarios is a significant concern, it is difficult to suggest that this translates into significant concerns in respect of air quality. There is only one small Air Quality Management Areas (AQMA) in the Borough, and whilst there is a large AQMA covering the entirety of Marlborough, there is no reason to suggest any significant concerns in respect of growth in Swindon Borough.
- 6.3.2. However, a further matter for consideration is air pollution from the A419 affecting North Meadow SAC at Cricklade. This is 'biodiversity' consideration as much as an 'air quality' consideration, if not more so, but it is appropriate to flag a concern here (under 'air quality'). This issue potentially suggests a degree of support for a focus of growth to the south east of Swindon, namely at 'Land at Days Lane'. It also serves to highlight a concern with growth at Highworth and a new settlement at 'Land at Burytown Farm'; however, any new settlement would deliver in the longer term and air quality is improving significantly nationally over time due to reduced emissions from vehicles.
- 6.3.3. In **conclusion**, it is not possible to differentiate between the scenarios with confidence, and a neutral effect is predicted. See further discussion below under 'transport'.

6.4. Biodiversity

Scenario 1 Proposed	Scenario 2 - SDA10 + Days Ln	Scenario 3 - SDA10 + Burytown	Scenario 4 - HW03 + Days Ln	Scenario 5 - HW03 + Burytown	Scenario 6 + Days Ln	Scenario 7 + Burytown
2	3	1	3	2	3	2

- 6.4.1. Taking the variable growth locations in turn:
- SDA10 (Land adjoining Blunsdon St. Andrew) – there is an adjacent small ancient woodland, associated with the crest of the Mid Vale Ridge. The woodland could come under pressure from growth both to the south (SDA10) and to the north (SDA09), although it does not appear to be accessible,. Perhaps more significantly, there are uncertainties in respect of SANG capacity in the north of Swindon, which is an important consideration given relative proximity to North Meadow SAC at Cricklade (also air pollution is a consideration, as discussed). There is a need to ensure a comprehensive approach to growth in the north of Swindon that ensures SANG capacity is delivered alongside new homes. There would appear to be good opportunities to deliver SANG, whether that involves making use of the raised / rising land of the Mid Vale Ridge and/or the low lying landscape north towards to River Ray.
 - HW03 (Twelve Oaks Golf Course) – Highworth is subject to notably low biodiversity constraint (e.g. nearby Shrivenham / Watchfield and Faringdon are likely more constrained, noting nationally designated SSSIs and ancient woodland). In particular, this is the case for land to the north of Highworth including Twelve Oaks Golf Course.³³
 - Days Lane (south east of Swindon) – there is significant biodiversity constraint given proximity to Coate Water SSSI, which comprises lowland fens priority habitat. There would be a need to carefully consider hydrological connectivity with the SSSI, and any growth would need to be considered with a long-term perspective aimed at ensuring

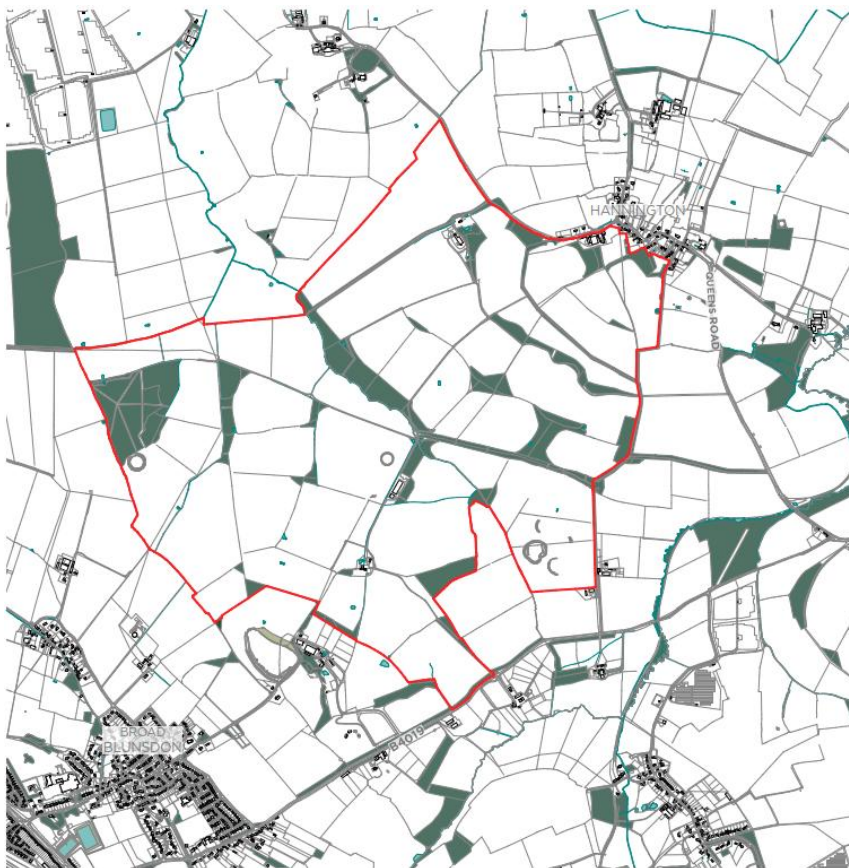
³³ There are small patches of priority habitat woodland to the south (there is no ancient woodland in the vicinity) that likely forms part of a wider network at a wider landscape scale (a band of fragmented woodland patches linking river corridors).

opportunities are taken to avoid impacts and realise targeted opportunities.

- New settlement (Land at Bury Town) – there would be good potential to deliver onsite SANG, but there is a degree of onsite biodiversity constraint (see figures below). This includes two small Local Wildlife Sites but development would avoid these areas.

- 6.4.2. With regards to ‘constant’ elements of the proposed strategy, a key consideration is avoiding growth at the north and north east edge of Swindon impacting North Meadow SAC, including noting that the current plan document does not specify SANG locations.
- 6.4.3. Otherwise, there is strong support for the proposed urban focused strategy, and no major concerns regarding intensifying growth within NEV (indeed, this area is subject to notably low biodiversity constraint in the sub-regional context). In the urban area there is extensive coverage of mature trees to the north of the train line, where a major new urban community is proposed, but there are no trees here with a Tree Protection Order (TPO), and it can be envisaged that retaining existing mature trees will be a key masterplanning / design priority, including accounting for the importance of urban shading in the context of urban ‘overheating’ as a growing issue. An important network of ancient woodlands is also a constraint to growth at Pipers Way Area, where the new proposal (relative to 2025) is to develop a greenfield site in addition to brownfield sites; however, there is little reason to suggest a significant concern.
- 6.4.4. In **conclusion**, it is considered appropriate to flag a concern with scenarios involving Land at Days Lane and, on balance, to flag support for Scenario 3 which would involve reduced growth north of Swindon and, in turn, a new settlement able to deliver SANG. With regards to significant effects, overall biodiversity is not a major constraint to growth locally (assuming SANG delivery), such that that plan-led growth represents an opportunity, but it is appropriate to flag a concern with Land at Days Lane.

Figure 6.1: A figure from the vision document for Lower Burytown Farm new settlement showing woodland and field boundaries within and around the site



6.5. Climate change adaptation

Scenario 1 Proposed	Scenario 2 - SDA10 + Days Ln	Scenario 3 - SDA10 + Burytown	Scenario 4 - HW03 + Days Ln	Scenario 5 - HW03 + Burytown	Scenario 6 + Days Ln	Scenario 7 + Burytown
=	=	=	=	=	=	=

- 6.5.1. A key consideration here is flood risk, and this is not known to be a major constraint to growth at the variable growth locations. Taking these in turn:
- SDA10 (Land adjoining Blunsdon St. Andrew) – this is raised land such that flood risk is not an onsite constraint although there is a need to consider delivery of high quality sustainable drainage systems (SuDS) to avoid downstream flood risk.
 - HW03 (Twelve Oaks Golf Course) – surface water is also a constraint to growth to the north of Highworth, this is understood to have factored into work to determine the site capacity (the proposal is for 50% greenspace).
 - Days Lane (south east of Swindon) – there is an adjacent stream associated with surface water flood risk, which is accounted for within the vision document submitted by the site promoter. Were consideration to be given to additional growth in this area then there would be a need to carefully account for the stream corridor including in terms of hydrological connectivity with nearby Coate Water SSSI.
 - New settlement (Land at Bury Town) – the site is interspersed by a series of stream corridors / surface water flood risk zones, but there is little reason to suggest that these would act as a significant constraint to masterplanning. See figure below.
- 6.5.2. With regards to ‘constant’ elements of the proposed strategy, there is strong support for the urban focused strategy from a flood risk perspective, as unlike many other towns and cities flood risk is not a major issue in Swindon, with river / stream / main surface water flood risk for the most part associated with green / blue infrastructure corridors designed-in as part of 20th century expansion. There is, however, a need to recall that urban sites associated with a low intensity use – e.g. carparking, offices – and now under consideration for intensification can tend to be subject to surface water flood risk.
- 6.5.3. With regards to new proposed greenfield sites, surface water flood risk is a consideration for several sites, perhaps most notably HW02 at Highworth (where there is a pending planning application), but this is a constraint that has factored into site capacity / emerging masterplanning, and it is not clear that flood risk at any of these sites leads to a need to compromise in respect of other masterplanning objectives.
- 6.5.4. This leaves the matter of NEV intensification, recognising that NEV is very strongly associated with a network of flood risk channels associated with the River Cole / the Vale. This is a matter for ongoing scrutiny, but, at the current time, there are no major concerns in the knowledge that much detailed work has been undertaken over the years to explore how NEV can come forward as a series of linked villages interspersed by a network of green/blue infrastructure contained within which are the areas of flood risk.
- 6.5.5. Finally, it is important to say that risk of urban overheating during heatwaves (likely to become more frequent) is an important climate change adaptation consideration, as is dealing with storm water in urban areas given a likely increase in the frequency and severity of storm events. However, it is difficult to conclude that the proposed high-ambition urban growth strategy gives rise to a concern, given the potential to master plan and design with these issues in mind (albeit also recognising that there will be many competing priorities in the context of challenging development viability).
- 6.5.6. In **conclusion**, it is not possible to differentiate between the scenarios with confidence, and a neutral effect is predicted. It is important to add that the plan has been informed by Strategic Flood Risk Assessment (SFRA) and consultation with the Environment Agency, and that work has been completed to demonstrate that a sequential approach has been taken to directing growth away from areas of flood risk as far as possible.

Figure 6.2: The site promoter's high level concept masterplan for Lower Burytown Farm new settlement (N.B. light green land is outside of the site boundary)



6.6. Climate change mitigation

Scenario 1 Proposed	Scenario 2 - SDA10 + Days Ln	Scenario 3 - SDA10 + Burytown	Scenario 4 - HW03 + Days Ln	Scenario 5 - HW03 + Burytown	Scenario 6 + Days Ln	Scenario 7 + Burytown
=	=	=	=	=	=	=

- 6.6.1. This is clearly a priority issue, and there is an important distinction between built environment and transport emissions. The former warrants being a particular focus of attention under this topic heading (given transport is a separate topic), but it is difficult to suggest that any of the variable growth locations represent a particular opportunity in respect of delivering net zero development and therefore minimising per capita emissions borough-wide. Strategic scale sites can benefit from economies of scale in support of development viability 'headroom' for net zero interventions but equally can face a variety of very significant cost challenges relating to infrastructure, which can 'squeeze' available funds for net zero.
- 6.6.2. With regards to Land at Days Lane and the Burytown new settlement option, proposals are at an early stage and there is little suggest that built environment decarbonisation is central to the vision or a masterplanning priority.
- 6.6.3. With regards to the current planning application for a 410 home scheme at Blunsdon St Andrews, the Planning Statement does include some positive commitments, but these warrant further scrutiny. Specifically:

- “The scheme would have an exemplar sustainable building design and would target on-site net zero carbon housing and a host of sustainable design techniques that respond positively to the Council’s declared climate emergency.”
- “All units will feature energy performance measures, such as photovoltaic panels and air source heat pumps, achieving net zero-carbon for all houses and significant carbon reduction well beyond current requirements.”

- 6.6.4. With regards to Highworth, the town benefits from notably stronger development viability than is the case for the Swindon urban area, but development viability is not as strong at Highworth in comparison to other towns and villages in the Borough and across the sub-region. The current planning application HW02 (250 homes) proposes for new homes to be *net zero ready*, which is a notably different commitment to *net zero* (specifically, net zero ready means that they will be net zero once the national grid fully decarbonises).³⁴
- 6.6.5. With regards to ‘constant’ elements of the proposed strategy, the strategy of focusing heavily on the town centre and wider urban area is clearly strongly supported from a transport decarbonisation perspective, but development viability will be a barrier to built environment decarbonisation given competing priorities including affordable housing and infrastructure delivery (N.B. there is also a wider discussion around the merits of high density versus lower density living from a built environment decarbonisation perspective). At NEV further work might be undertaken to explore whether the new higher growth strategy could perhaps give rise to the possibility of delivering the scheme as a national net zero exemplar although, once again, it is recognising that decarbonisation is just one policy priority (with cost implications) amongst many.
- 6.6.6. In **conclusion**, it is not possible to differentiate between the scenarios with confidence. With regards to significant effects, a ‘moderate or uncertain’ negative effect is predicted (as per 2025) on the basis that achieving the required trajectory to net zero is highly challenging, such that there is a clear case for placing the realisation of built environment decarbonisation opportunities as a central pillar of strategy / site selection. The Borough has set its net zero target date in line with the national net zero date (2050), but it is nonetheless the case that the required decarbonisation trajectory is so stretching that there is a high bar to predicting even a ‘neutral’ effect.

6.7. Communities

Scenario 1 Proposed	Scenario 2 - SDA10 + Days Ln	Scenario 3 - SDA10 + Burytown	Scenario 4 - HW03 + Days Ln	Scenario 5 - HW03 + Burytown	Scenario 6 + Days Ln	Scenario 7 + Burytown
 1	2	2	2	2	2	2

- 6.7.1. Discussion under this topic is an opportunity to explore wide-ranging issues / opportunities over-and-above those relating to ‘accessibility’ (as discussed above).
- 6.7.2. Taking the variable growth locations in turn:
- SDA10 (Land adjoining Blunsdon St. Andrew) – development would abut recent growth locations, potentially suggestive of limited local community concerns with growth. However, and as discussed, there is a need to ensure a comprehensive approach to growth at this northern edge of Swindon with a long-term perspective, as far as possible, with a view to avoiding issues and realising opportunities. Key issues relate to: A) community infrastructure (as discussed); B) transport (as discussed in section 5.2 and discussed further below); and C) landscape and green infrastructure

³⁴ For context the proposal is also to deliver affordable housing in line with current local policy requirements, specifically: “The proposed development will deliver a policy compliant number of affordable homes on site, i.e. 30% of the total number to be built. Should 250 new homes be built on site, 75 of them will be affordable as required by the adopted Local Plan. Affordable housing will be in a mix of tenures, including low cost home ownership, social rented and first homes, and will be the subject of discussions with Swindon Borough Council (SBC) and confirmed in the S106 Agreement.”

(given steeply rising land and a need to ensure communities with distinct identities).

- HW03 (Twelve Oaks Golf Course) – it is understood that growth to the north is a preferable direction to growth in comparison to other growth options that have previously been considered. However, the concern is a new community that does not relate very well to the town, and traffic through the town centre is potentially an issue. A new Neighbourhood Plan was recently adopted but it is not clear that growth to the north gives rise to significant conflict or tensions. The following statement from the Interim SA Report (2025)³⁵ still broadly holds true: *“Overall, it is recognised that delivering growth at Highworth is challenging in ‘communities’ terms. There is a need to account for the views of the Town Council and local residents as far as possible and also seek to ensure that any growth is carefully targeted to maximise community benefits (‘planning gain’), putting an end to ongoing piecemeal / relatively uncoordinated growth with opportunities missed to deliver strategic infrastructure etc.”*
- Days Lane (south east of Swindon) – the site is adjacent to a new community delivered over recent years, but there are nonetheless understood to be local community concerns in respect of growth in this area, including given the strategic importance of the Coate Water. There is also a need to consider Day House Lane, which is currently a quiet lane likely used by walkers, recognising that it is cut off by the A419. Development would lead to traffic along the lane, and a need for upgrades. Opportunities to improve the walking and cycling infrastructure in this area could potentially be explored, e.g. improving links to Coate Water. Finally, it is important to recall that the site does link well to the urban area including the town centre.
- New settlement (Land at Bury Town) – new settlements can represent an opportunity to deliver long-term growth in a way that minimises impacts to existing communities. However, there would be impacts to Broad Blunsdon, which is a historic Cotswold-edge village that has seen recent growth and is set to experience significant growth over the plan period given proposed allocations and nearby Kingsdown. Also, the site is a somewhat accessible given several footpaths, a bridleway and expansive views.

- 6.7.3. With regards to ‘constant’ elements of the proposed growth strategy, at this stage there is broad support noting that the Council took the voluntary step of consulting on a full draft version of the Local Plan under Regulation 18. Also, there is likely a degree of support for reduced growth at Wroughton from a communities-perspective (but there is a need for an ongoing focus on ensuring growth that maximises planning gain). The interim SA Report previously stated:

“... on the one hand it might be anticipated that a strongly urban and transport focused strategy will be supported locally because the effect will be to minimise pressure on greenfield land. Also, regeneration of the town centre is clearly a major priority for the Borough’s residents. However, on the other hand, there are many community-related issues and opportunities to work through before delivering on a high growth strategy for the town centre and wider urban area, and it is important to recognise that the proposed strategy is a new direction quite distinct from the adopted Local Plan and proposals set out in Local Plan consultation documents since 2015.”

- 6.7.4. In **conclusion**, there is support for the proposed submission approach (Scenario 1) on balance, but it is not clear that there are major concerns under any of the scenarios.

³⁵ The Interim SA Report (2025) considered the option of higher growth at Highworth in broad terms, i.e. without specifying sites.

6.8. Economy and employment

Scenario 1 Proposed	Scenario 2 - SDA10 + Days Ln	Scenario 3 - SDA10 + Burytown	Scenario 4 - HW03 + Days Ln	Scenario 5 - HW03 + Burytown	Scenario 6 + Days Ln	Scenario 7 + Burytown
		2		2		2

- 6.8.1. None of the variable locations would deliver significant employment land, although there could be potential to deliver some small scale employment land at a new settlement.
- 6.8.2. With regards to Land at Days Lane, whilst the assumption is a 500 home scheme, as discussed there could be the opportunity to consider a larger comprehensive scheme involving adjacent land that comprises former landfill and, were this the case, there could be an opportunity to consider employment land. This would be on the basis of proximity to M4 J15; however, road links are currently poor (Days Lane).
- 6.8.3. With regards to links to existing employment, the two variable sites on the edge of Swindon perform reasonably well in this regard. Highworth is less well linked, but there is an adjacent small industrial estate (strategic growth to the north could be represent an opportunity to deliver new employment land to the benefit of the town, but there is no clear opportunity at the current time). With regards to a new settlement at Lower Burytown Farm, the site is within cycling distance of employment to the east of Swindon, but traffic would pass through Broad Blunsdon and/or Stanton Fitzwarren (this would need to be avoided). There are also reasonable road links to Oxford, but this would be via Highworth and Shrivenham, and the main bus route is via the A420.
- 6.8.4. With regards to 'constant' elements of the proposed growth strategy, whilst there are a range of matters for ongoing consideration, including in respect of the new proposals (relative to 2025) in respect of Windmill Hill and Northern Gateway, overall there is broad support for the proposed strategy, particularly the vision-led town centre strategy. The plan is considered to align strongly with the Economic Growth Plan which itself sets out to align with national economic growth strategy, as discussed in Section 5.2.
- 6.8.5. In **conclusion**, it is considered appropriate to flag a concern with a new settlement that would not align strongly with economic growth strategy, i.e. the focus might alternatively be on a new settlement elsewhere that aligns more strongly (and a future local plan would be an appropriate forum to explore options, potentially informed by an SDS). Whilst there is a case for predicting a significant positive effect, on balance a 'moderate or uncertain' effect is predicted for the better performing scenarios.

6.9. Equality

Scenario 1 Proposed	Scenario 2 - SDA10 + Days Ln	Scenario 3 - SDA10 + Burytown	Scenario 4 - HW03 + Days Ln	Scenario 5 - HW03 + Burytown	Scenario 6 + Days Ln	Scenario 7 + Burytown
=	=	=	=	=	=	=

- 6.9.1. The aim here is to consider if and how the Local Plan might significantly impact those with protected characteristics under the Equality Act 2010. By way of context the Employment Land Review (ELR) is a source of evidence around some key issues:³⁶
- Deprivation levels in the Borough are around average, but parts of the borough have very high levels of skills and training yet also have high levels of income deprivation. In

³⁶ Statistics that serve to highlight socioeconomic economic issues are important for consideration of equality issues/impacts in the context of local plan-making, recognising that: A) those communities, households and individuals with protected characteristics that also face socio-economic challenges warrant being a key focus; and B) the Local Plan has a key role to play in terms of addressing socio-economic issues and realising opportunities.

contrast, there are also parts of the Borough and surrounding areas within the lowest 10% of deprivation nationally.

The current plan document elaborates, explaining: *“More than one in ten neighbourhoods in Swindon are among the most deprived in the UK. The Council recognises that growth must be fairer and more inclusive. Delivering this will require a coordinated approach to housing, skills and employment, alongside the right services, infrastructure and public spaces to ensure all residents can benefit from improved opportunities and a better quality of life.”*

- Swindon is facing a growing public health challenge with rising obesity rates. In 2024/25, 32.9% of Swindon’s adult population (18+ years) were obese.

The current plan document elaborates, explaining: *“Health is a particular concern. Local public health material highlights that Swindon has significant issues with excess weight among adults and children, with 2023–24 National Child Measurement Programme data showing that 37% of Year 6 children in Swindon were overweight or obese. Planning cannot solve these issues on its own, but it can help by supporting access to green space, sport, leisure, walking routes, cycling routes, community facilities and healthier local environments.”*

- Alcohol-related mortality was 41.6 per 100,000 in Swindon in 2022 – greater than the rate in the South West or England (37.3 and 39.7 respectively).
- A priority identified within Swindon’s Health and Wellbeing Strategy is related to mental health. According to The Strategy, an estimated 15% of residents live with a common mental health disorder and Swindon is the 6th highest area in the country for hospital admissions as a result of self-harm in those aged 15-19 years and 20-24 years.
- Between 2017 and 2022 the number of jobs in the borough fell by 5,650 or 4.9%. This compares to a growth of 4.5% in the South West Region and 4.7% nationally.
- Between 2022 and 2023 the Borough saw a 3.9% fall in the number of businesses (compared to a 0.7% fall regionally and a 1.6% fall in England).
- Swindon’s unemployment rate (4.1%) is above the SW (3.0%) and England (3.9%).
- A considerably higher proportion of Swindon Borough’s employment (24%) is in the lowest-skilled groups compared to the South West (16%) and England (15%).
- Swindon Borough also has lower proportions of the working-age population with degree-level qualifications (33.7% compared to 42% in the SW and 43.2% in England).

- 6.9.2. There is little potential to meaningfully differentiate between the alternative growth scenarios, other than to say that a new settlement would represent a good opportunity to deliver a scheme in support of equalities objectives, for example in terms of the mix of onsite uses, the mix of housing to include specialist housing and also in terms of masterplanning and design of the urban realm.
- 6.9.3. With regards to ‘constant’ elements of the proposed growth strategy, it is important to flag that the town centre and wider urban focused strategy give rise to a range of important considerations, for example: 1) town centre regeneration, which on the one hand should be a major positive in the long term, but in the short term will give rise to considerable disruption over the construction period; 2) ensuring community infrastructure is delivered alongside new homes in the town centre (a matter that has already been discussed above); and 3) change of use at existing employment sites and more broadly a shift in the nature of local employment opportunities, feasibly with a risk that those suited to lower skilled work could face increased challenges around accessing suitable employment, albeit there is much potential to mitigate concerns including through a skills and education strategy.
- 6.9.4. Finally, it is important to emphasise the importance of delivering growth in line with vision-led transport planning principles from a perspective of supporting active travel in support of health objectives, and also generally allowing ease of movement including by those with protected characteristics who might otherwise experience barriers to travelling around the town. In this regard there is support for the urban growth strategy

focused on defined transit corridors, but there is ongoing uncertainty regarding the potential to deliver upgrades – particularly in terms of active travel infrastructure and bus services – in practice, including given ongoing concerns regarding traffic along certain key corridors, as discussed in Section 5.

- 6.9.5. In **conclusion**, it is not possible to differentiate between the scenarios with confidence, and a neutral effect is predicted. It is not clear that there are any significant concerns, recognising limited direct links between the equality objectives and the spatial strategy at the heart of the Local Plan (e.g. many key equality issues/opportunities are a significant consideration at the planning application stage more so than at the local plan stage). However, there are important decisions in respect of development management policy, including for specific areas and sites (most notably the town centre).

6.10. Historic environment

Scenario 1 Proposed	Scenario 2 - SDA10 + Days Ln	Scenario 3 - SDA10 + Burytown	Scenario 4 - HW03 + Days Ln	Scenario 5 - HW03 + Burytown	Scenario 6 + Days Ln	Scenario 7 + Burytown
	2	2	2	2	2	2

6.10.1. Taking the variable growth locations in turn:

- SDA10 (Land adjoining Blunsdon St. Andrew) – there is an adjacent Grade II listed farmhouse associated with the crest of the hill / ridge, but there is likely good potential to avoid / mitigate impacts, and there is likely limited current appreciation of this asset (there is no adjacent road and no nearby footpaths). Perhaps more significant is Blunsdon St Andrew conservation area, which is nearby to the south of the site. There are limited concerns regarding direct visual impacts, but a key issue is traffic along Tadpole Lane, which runs adjacent to the conservation area.
- HW03 (Twelve Oaks Golf Course) – there is distinctly low historic environment constraint; however, an important consideration is traffic through town centre.³⁷
- Days Lane (south east of Swindon) – there is an adjacent scheduled monument associated with two Grade II listed buildings (Badbury Wick, as shown on [historic mapping](#)), but the listed buildings are slightly set back from Days Lane, which does not have a strong rural character, noting that it is blocked off to the south by the A419. Impacts could potentially be avoided by achieving site access to the north.
- New settlement (Land at Bury Town) – the historic environment is a clear constraint to growth here, in terms of: A) impacts to the setting of Castle Hill Fort scheduled monument to the south; B) potentially impacts to the setting of the Hannington conservation area to the north; C) traffic through the Highworth and Stanton Fitzwarren conservation areas; and D) archaeology, including noting a designated ‘Significant Unscheduled Archaeological Feature (Policy EN10 of the adopted Local Plan). As discussed, this is a somewhat accessible landscape including with an important footpath through the site that links Broad Blunsdon (Castle Hill) and Hannington. An important masterplanning consideration would involve restricting growth to lower ground as far as possible, as per the discussion below under ‘landscape’.

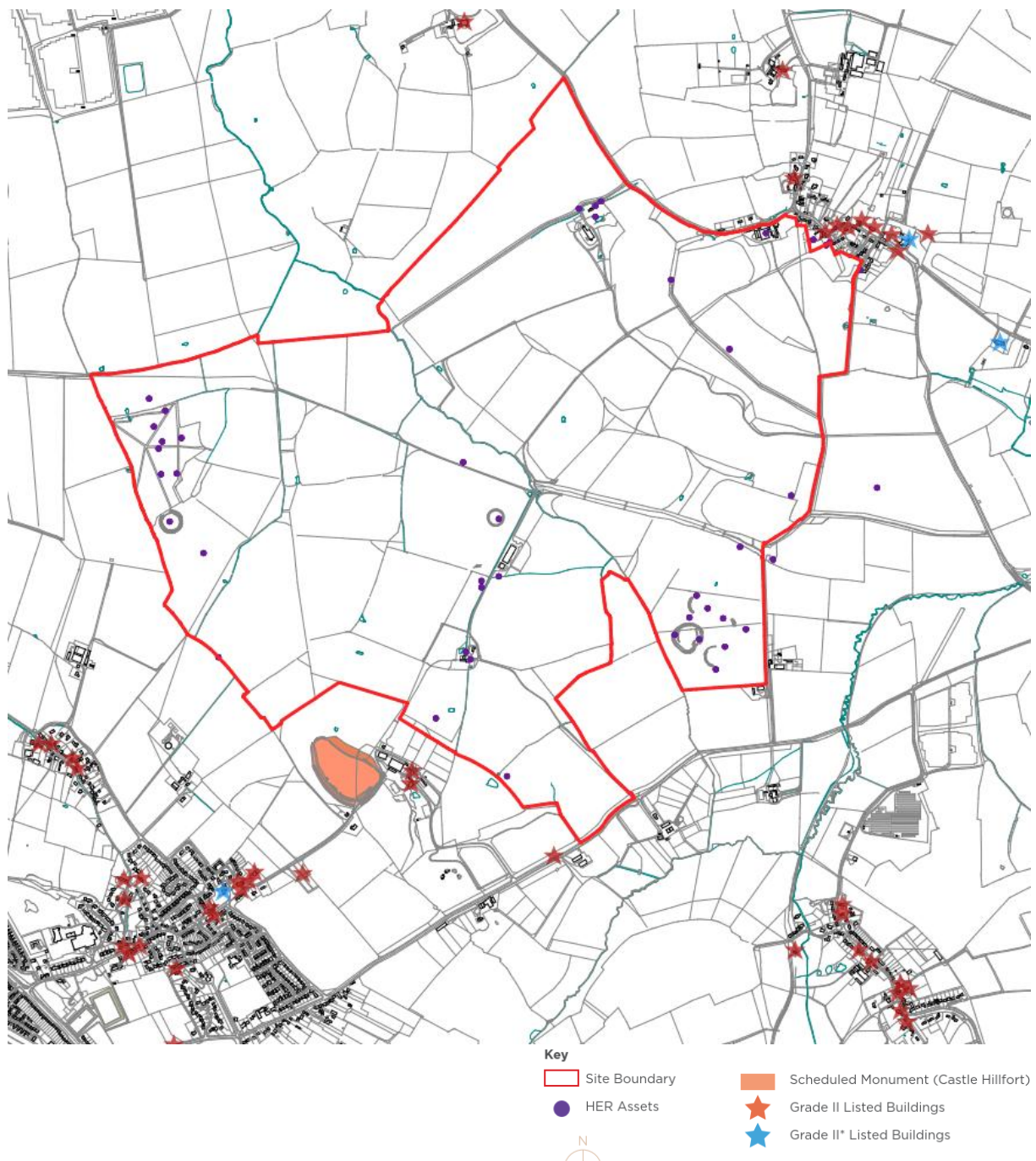
- 6.10.2. With regards to ‘constant’ elements of the proposed growth strategy, the town centre-focused strategy that underpins all of the growth scenarios gives rise to a range of important issues and opportunities, most notably relating to Swindon’s railway heritage, and it is clear that matters are at the core of the Heat of Swindon Vision. For example,

³⁷ The Interim SA Report provided context as follows: “The historic environment is a key constraint to growth at Highworth, given: a highly valued historic town centre; archaeological constraint associated with the Mid Vale Ridge; and conservation area(s) to the west of the town. There are clear constraints to expansion to the west and to the east, whilst expansion to the north would generate additional car traffic through the historic core (albeit the historic high street is located off the main road through the town). With regards to growth to the southwest, this is strongly undulating land associated with the Mid Vale Ridge, and it is noted that the Draft Neighbourhood Plan shows a clear view of the Grade I listed church across this land; however, there would likely be good potential to minimise and mitigate concerns, including via extensive strategic green infrastructure.”

redevelopment of Bristol Street Car Park adjacent to the Railway Village could well represent a heritage opportunity. Finally, at Wroughton there is support for a focus of growth to the north (given the village historic core to the south) and at NEV a network of scheduled monuments has long featured as a key masterplanning factor.

- 6.10.3. In **conclusion**, it is difficult to differentiate between the scenarios but on balance it is appropriate to flag support for the proposed submission approach. With regards to significant effects, there is a case to be made for predicting positive effects, recalling that the baseline situation is one whereby there would be ongoing sub-optimal growth under 'the presumption'. However, on balance it is considered appropriate to predict a 'neutral' effect, including noting that within settlements, and therefore within the town centre including the historic railway area (a focus of Historic England's Regulation 18 representation) there is now a 'permanent presumption' under NPPF Policy S4.

Figure 6.3: Select historic environment designations in and around the new settlement option

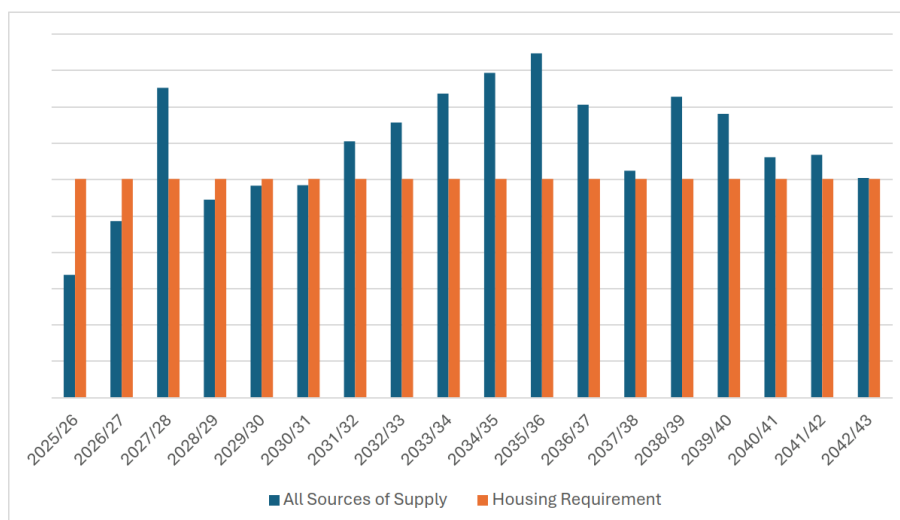


6.11. Homes

Scenario 1 Proposed	Scenario 2 - SDA10 + Days Ln	Scenario 3 - SDA10 + Burytown	Scenario 4 - HW03 + Days Ln	Scenario 5 - HW03 + Burytown	Scenario 6 + Days Ln	Scenario 7 + Burytown
2	3	4	3	4	1	1

- 6.11.1. Under Scenario 1 (the proposed submission approach) the housing requirement would be set at LHN over the plan period and for every year across the plan period (i.e. the proposed requirement is not stepped, as is often the case) and total supply is 15% above LHN. A plan period 'supply headroom' is supported, but an arguably more important consideration is ensuring a healthy supply headroom over-and-above the housing requirement in the early years of the plan period, with a view to ensuring that the housing requirement can be delivered year-on-year in practice.
- 6.11.2. In this regard, what is clear is that there is not support for replacing either SDA15 or HW03 with a new settlement, as a new settlement would take many years to come forward. SDA15 and HW03 have the potential to deliver early in the plan period, although this is somewhat uncertain in respect of SDA15 given transport infrastructure.
- 6.11.3. With regards to the two higher growth scenarios, either could potentially enable the housing requirement to be set modestly above LHN, likely with a view to providing flexibility to potentially accommodate unmet need, given the *risk* of unmet need from Cotswold and potentially also Wiltshire (it is difficult to suggest a case for a housing requirement set above LHN on the grounds of an economic growth opportunity). This could potentially be achieved via an upward stepped housing requirement.
- 6.11.4. Also, higher growth would represent a proactive response to affordable housing needs, recognising that there would be a need to deliver affordable housing at a rate of 36% over the plan period in order to provide for needs in full, and this may not be possible given the challenge of delivering affordable housing in the town centre.
- 6.11.5. Scenario 7 would also represent a proactive response to providing for housing needs looking beyond 2043, although it is recognised that a forthcoming SDS (potentially for the Thames Valley) will be an appropriate forum for considering long term infrastructure-led growth strategy aimed at delivering on housing need and wider objectives post 2043.
- 6.11.6. Further considerations are as follows: A) HW03 and potentially also Land at Days Lane appear likely to be sites without abnormal development costs, such that they should be well-placed to deliver the full policy quota of affordable housing alongside delivering infrastructure and delivering on wider objectives; B) both HW03 and Land at Days Lane are also relatively distant from other major growth locations such that there are no concerns regarding market saturation affecting development viability; C) at Highworth there may be an element of locally arising need for housing, including affordable housing; C) a new settlement would be well placed to deliver a good mix of housing to include specialist housing, but would contribute less to settlement-specific needs; and D) a new settlement could well be suited to delivering a site for Gypsies and Travellers.
- 6.11.7. In **conclusion**, Scenarios 6 and 7 could would represent a very proactive approach to providing for housing needs and/or ensuring the Borough delivers on its committed housing requirement, including recognising the delivery risks associated with elements of the proposed strategy that are a constant across the growth scenarios, most notably within the town centre.³⁸ Replacing a strategic greenfield urban extension with a new settlement would give rise to a concern regarding the robustness of the housing land supply over the earlier years of the plan period.

³⁸ The Interim SA Report stated: "Housing delivery – whilst the Heart of Swindon commits to 8,000 homes in the Central Area, and this commitment is very important for developing investor confidence, it is important to reiterate that the Local Plan must commit to a housing requirement that is deliverable, avoiding a repeat of the issues experienced following the adopted Local Plan, most notably in respect of NEV (a commitment to deliver 8,000 homes by 2026)."

Figure 6.4: The proposed submission housing requirement / supply trajectory

6.12. Landscape

Scenario 1 Proposed	Scenario 2 - SDA10 + Days Ln	Scenario 3 - SDA10 + Burytown	Scenario 4 - HW03 + Days Ln	Scenario 5 - HW03 + Burytown	Scenario 6 + Days Ln	Scenario 7 + Burytown
1	1	1	2	2	1	1

6.12.1. Taking the variable growth locations in turn:

- SDA10 (Land adjoining Blunsdon St. Andrew) – the Interim SA Report (2025) discussed *“notable and arguably significant landscape constraint on account of the relationship between settlement pattern and the Mid Vale Ridge... However, the significance of concerns is uncertain, including recalling that the sensitivities involved are likely of local significance rather than larger-than-local (and certainly not national).”* It is clear that the recent Abbey Farm development adjacent to the south stopped short of hill top (a high point of 145m), whilst the proposal is now to develop the hill top and also to then encroach downhill to the north. Through careful masterplanning there may be good potential to take a ‘landscape-led’ approach to growth that accounts for the steep topography and delivers distinct settlements/neighbourhoods separated by high quality green infrastructure (Tadpole GV to the west, the proposed allocation at North Tadpole to the north and Blunsdon St Andrews to the south); however, in practice there could be challenges given the pending planning for 410 homes within SDA10.
- HW03 (Twelve Oaks Golf Course) – this is former golf course associated with a low lying landscape likely of relatively limited sensitivity (although there are some views towards Highworth town centre and also views across the River Cole valley / vale to the east). However, the site does not relate well to the settlement edge such that there is a concern regarding future sub-optimal development creep across the vale.³⁹
- Days Lane (south east of Swindon) – landscape is potentially a significant constraint given the raised ground of the North Wessex Downs scarp slope to the south, plus the site itself is slightly raised land with some long distance views of Swindon. However, the significance of concerns is uncertain, and it may be that there are limited sensitive viewpoints, including recalling that Days Lane is a dead end road and not a main access road for the adjacent neighbourhood. There is an adjacent footpath but it is shown as incomplete on the Ordnance Survey map. It does appear that there could

³⁹ The Interim SA Report stated: *“At Highworth there are important choices to be made regarding expansion of the town in a way that aligns with landscape objectives, and it is unfortunate that the opportunity for well-rounded and relatively well-contained growth across the southern sector of the town appears now to have been missed on account of recent permissions under the presumption in favour of sustainable development.”*

be an opportunity to increase accessibility, potentially linking to Coate Water. Finally, there is potential for growth here to be well contained, given Coate Water and associated stream corridors, former landfill and then the M4 to the south.

- New settlement (Land at Bury Town) – this is a low lying vale landscape and it does appear that there could be good potential to draw upon the rising land of the Mid Vale Ridge for containment, but the corollary is that there are likely sensitive views within and across the site. There would also be the potential to draw upon a network of woodlands, field boundaries and stream corridors to frame a new settlement. It is difficult to suggest a concern regarding impacting the gap between Broad Blunsdon and Highworth, and a new settlement could reduce pressure for settlement expansion. It would be important to avoid encroachment uphill towards Hannington.

- 6.12.2. With regards to ‘constant’ elements of the proposed growth strategy, there is clearly strong support for the urban focus, and the constant greenfield allocations mostly give rise to limited concerns. There is a need for an ongoing focus on ensuring a comprehensive approach to growth to the north of Swindon and also at Wroughton
- 6.12.3. In **conclusion**, it is difficult to differentiate the scenarios with confidence given the available evidence, but on balance there is not support for replacing HW03 with either of the two variable omission sites.
- 6.12.4. With regards to significant effects, ‘moderate or uncertain’ positive effects are predicted for the better performing scenarios, including as there should be a robust housing land supply (as measured against the housing requirement) such that the Borough does not face ongoing pressure from speculative greenfield planning applications under the presumption in favour of sustainable development / tilted balance / default yes.

6.13. Soils and resources

Scenario 1 Proposed	Scenario 2 - SDA10 + Days Ln	Scenario 3 - SDA10 + Burytown	Scenario 4 - HW03 + Days Ln	Scenario 5 - HW03 + Burytown	Scenario 6 + Days Ln	Scenario 7 + Burytown
	2		2		2	

- 6.13.1. A key consideration is agricultural land quality, informed by the new national dataset. Taking the variable growth locations in turn :
- SDA10 (Land adjoining Blunsdon St. Andrew) – the national dataset shows the site as likely grade 3b quality agricultural land such that it is not classified as ‘best and most versatile’. However, much of the land has been surveyed and shown to be grade 3a.
 - HW03 (Twelve Oaks Golf Course) – as above.
 - Days Lane (south east of Swindon) – is likely grade 1 quality agricultural land.
 - New settlement (Land at Bury Town) – is likely grade 3b quality agricultural land such that it is not classified as ‘best and most versatile’.
- 6.13.2. With regards to the new proposed greenfield allocations that feature as a constant across the growth scenarios:
- North Tadpole – has been surveyed and comprises grade 3b quality land (not BMV)
 - East Wroughton – there is a mixture of grade 2 and grade 3b quality land in this area.
 - Broad Blunsdon – this is likely grade 3b quality land.
- 6.13.3. In **conclusion**, it is appropriate to flag a concern with Scenarios involving Land at Days Lane, albeit there would only be modest loss of grade 1 quality agricultural land. It can also be noted that higher growth could feasibly help to reduce pressure for growth in the southern part of Cotswold District where there quite extensive higher quality land.

- 6.13.4. Aside from agricultural land quality one other consideration is avoiding the sterilisation of known minerals resources, but this is not known to be a major issue on the basis of the adopted Core Strategy, albeit it is recognised that a new strategy is forthcoming.

6.14. Transport

Scenario 1 Proposed	Scenario 2 - SDA10 + Days Ln	Scenario 3 - SDA10 + Burytown	Scenario 4 - HW03 + Days Ln	Scenario 5 - HW03 + Burytown	Scenario 6 + Days Ln	Scenario 7 + Burytown
2	1	3	2	3	2	3

- 6.14.1. This is a key consideration for the spatial strategy, as has been discussed. Whilst key evidence is forthcoming (the Transport Impact Assessment), it is clear that there are challenges associated with delivering transport infrastructure upgrades to accommodate growth to the north and north east of Swindon, and it is important to recognise that capacity on the transport network is also important for bus services and active travel.
- 6.14.2. This suggests a degree of support for Land at Days Lane, given good links to the urban area including via a transit corridor, although there would be a need to upgrade Days Lane. There is no clear transport case to be made for the new settlement option, but it would have the benefit of delivering in the longer term allowing time to plan for the required transport upgrades. Growth at Highworth is broadly supported in transport terms, but the site does not relate very well to the town centre. Finally, with regards to SDA15, as well as National Highways concerns regarding the A419 there are also local road challenges, including Tadpole Lane, which is a steep hill with a sharp bend.
- 6.14.3. In **conclusion**, whilst there is strong support for the urban growth strategy there is a degree of uncertainty in respect of Scenario 1 ahead of the TIA. In this light, Scenario 2 is a clear preferable option.

6.15. Water

Scenario 1 Proposed	Scenario 2 - SDA10 + Days Ln	Scenario 3 - SDA10 + Burytown	Scenario 4 - HW03 + Days Ln	Scenario 5 - HW03 + Burytown	Scenario 6 + Days Ln	Scenario 7 + Burytown
=	=	=	=	=	=	=

- 6.15.1. A Water Cycle Study (WCS) has been completed that assesses Scenario 1, with the headline conclusions as follows:
- A headroom capacity assessment at 6 STWs within the borough has been undertaken. The assessment has sought to determine whether the STWs have sufficient headroom under current permits and capacity to process the predicted additional wastewater flows to 2043. To support the headroom assessments an accompanying review of storm overflows within each STW catchment was also undertaken.
 - Blunsdon STW: Current DWF permit is forecast to be exceeded by >25% under Q80 by the end of the plan period (red). Under Q90, the exceedance is slightly below 25% (amber), indicating a significant risk of permit breaches.
 - Swindon, Highworth, Wanborough and Marlborough STWs: Current DWF permits are forecast to be exceeded under Q80, although by less than 25%. Under Q90, exceedances are also predicted at all sites except Wanborough.
 - Shrivenham STW: Current DWF permit is not forecast to be exceeded under either Q80 or Q90.
 - Thames Water has planned capacity upgrades at Swindon, Highworth,

Wanborough and Marlborough STWs. With the exception of Wanborough (planned for 2028) the timescales for the other schemes remain unclear.

- At Blunsdon STW an upgrade is underway to improve effluent quality, but it will not increase treatment capacity. No upgrades are planned at Shrivenham STW.
 - The storm overflows within the STW catchments show spillage trends are influenced by the amount of rainfall each year. The total number of spills and total spill duration is considered high for many of the assessed storm overflows, with >10 spills annually being surpassed by a number of storm overflows. This tallies with the known issues with headroom at some of the STWs.
 - A water quality assessment at the 6 STWs has also been undertaken. The assessment sought to determine whether the proposed development is predicted to cause deterioration in water quality parameters. A baseline, post-development and post-development with TALs run was completed so that the difference in quality caused by the development could be simulated. The TALs run then simulates what could be achieved when applying the technically achievable limits to the treatment works.
 - In terms of percentage deterioration, future development does not lead to a deterioration greater than 10% at 4 of the 6 STW.
 - There are two STWs which are an exception; Wanborough and Blunsdon. Wanborough STW results show a >10% deterioration in all measured parameters bar nitrate, while Blunsdon showed a >10% deterioration for orthophosphate and total phosphorus. This result is reversed when TALs are applied.
 - In terms of WFD deterioration, future development does not lead to a deterioration in WFD status for any of the elements assessed at all 6 of the STWs. The implementation of TALs results in betterment of WFD parameters for many of the sites.
 - In terms of prevention from meeting Good WFD Status in the future, Good or High status remain for a number of parameters when factoring in development.
 - Where this is not the case, the baseline status for the parameter is already below Good and development has a limited impact on concentrations. Therefore, development is not considered a barrier to preventing the receiving water body from achieving good status, instead it is existing pollutant levels within the WFD catchment.
 - AMP8 schemes at Highworth and Swindon STWs reflect the modelled TAL values; therefore, no additional modelling was required. The schemes are expected to reduce downstream total phosphorus and orthophosphate concentrations. At Highworth, this improves the baseline WFD status for orthophosphate from Bad to Moderate, while the status at Swindon remains unchanged.
 - Nitrate is not assessed as part of the WFD, however high nitrate levels are present in all assessed watercourses. This is primarily associated with agricultural sources and groundwater-fed catchments rather than future development, meaning agricultural management should be a key focus for improving environmental capacity.
- 6.15.2. Overall, it is clear that wastewater treatment capacity is a constraint, but it is unclear how significant the issue is at this stage (including ahead of receiving representations from the Environment Agency and Water Company).
- 6.15.3. On the one hand this serves to highlight a concern with the higher growth scenarios. However, on the other hand, it serves to highlight a delivery risk associated with Scenario 1 and, in turn, an argument for supporting additional supply as a contingency.
- 6.15.4. Finally, there could well be wastewater treatment challenges associated with a new settlement, but this is uncertain and there would be ample time to plan for upgrades.
- 6.15.5. In **conclusion**, it is not possible to differentiate between the growth scenarios with any certainty and it is appropriate to predict a 'moderate or uncertain' negative effect.

6.16. Appraisal summary

- 6.16.1. In summary, the appraisal finds all of the RA growth scenarios to be associated with pros and cons, and it is for the Council to weigh these 'in the balance', trading off between competing objectives as necessary, before then arriving at a conclusion regarding which of the scenarios best represents sustainable development.
- 6.16.2. Scenario 1 ranks highest across the greatest number of topics, but this should not be taken as in any way confirmation that it is best performing overall or best represents sustainable development. That is because: A) the sustainability topics are not assumed to have equal weight; and B) there is also a need to factor-in the significance of effects.
- 6.16.3. For example, were the Council to give particular weight to 'homes' related objectives then this could lead to a conclusion that Scenario 1 is not best performing.

Table 6.1: RA growth scenarios appraisal summary⁴⁰

	Scenario 1 Proposed	Scenario 2 - SDA10 + Days Ln	Scenario 3 - SDA10 + Burytown	Scenario 4 - HW03 + Days Ln	Scenario 5 - HW03 + Burytown	Scenario 6 + Days Ln	Scenario 7 + Burytown
Topic	Order of preference (numbers) and predicted significant effects (shading)						
Accessibility	=	=	=	=	=	=	=
Air quality	=	=	=	=	=	=	=
Biodiversity	2	3	1★	3	2	3	2
CC adaptation	=	=	=	=	=	=	=
CC mitigation	=	=	=	=	=	=	=
Communities	1★	2	2	2	2	2	2
Economy / employment	1★	1★	2	1★	2	1★	2
Equality	=	=	=	=	=	=	=
Historic env.	1★	2	2	2	2	2	2
Homes	2	3	4	3	4	1★	1★
Landscape	1★	1★	1★	2	2	1★	1★
Soils & resources	1★	2	1★	2	1★	2	1★
Transport	2	1★	3	2	3	2	3
Water	=	=	=	=	=	=	=

⁴⁰ Under each sustainability topic, i.e. within each row of the table, the aim is to: 1) rank the scenarios in order of performance (with a star indicating best performing); and then 2) categorise the performance in terms of 'significant effects' using red / amber / light green / green, where: **red** indicates a significant negative effect; **amber** indicates a negative effect of limited or uncertain significance; **light green** indicates a positive effect of limited or uncertain significance; **green** indicates a significant positive effect; and **no colour** indicates a neutral effect.

7. The preferred growth scenario

Introduction

- 7.1.1. The following text was **prepared by SBC officers** in response to the appraisal above (by AECOM). The text below does not amount to an appraisal.

Reasons for supporting Growth Scenario 1

- 7.1.2. Scenario 1 is taken forward as the basis for the Draft Local Plan that is currently the focus of consultation. The appraisal shows it to perform suitably well, such that officers believe it to be: *“Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence”* (NPPF para 36).
- 7.1.3. It is acknowledged that there is a ‘homes’ argument for supporting certain of the alternative scenarios, but under Scenario 1 the housing requirement would be set at local housing need (LHN), including from the start of the plan period, and the identified housing supply is sufficient to ensure a five year housing land supply. There is no clear case to be made for a housing requirement set above LHN.
- 7.1.4. The transport case for supporting Scenario 2 is also acknowledged, but there is confidence that transport challenges can be overcome and Scenario 2 would involve a site to the south east of Swindon that is associated with issues and challenges.

Part 2: SA findings at this stage?

8. Introduction to Part 2

- 8.1.1. This part of the report presents an appraisal of the Proposed Submission Local Plan as a whole under the SA framework (i.e. under the same set of 14 topic headings used to structure the appraisal in Section 6). The appraisal essentially recaps the appraisal of growth scenario one and additionally considers development management policies.
- 8.1.2. Under each topic heading the aim is to reach a conclusion on the ‘significant effects’ of the Local Plan as a whole, which can involve confirming the conclusion reached for growth scenario 1, as appraised in Section 6. With regards to methodology, account is taken of the baseline situation (a significant effect is an effect on the baseline, which is not a static situation but one whereby growth would come forward without a Local Plan), and various potential effect characteristics. For example, there is a need to consider short and long term effects, direct and indirect effects and the cumulative effects of the Local Plan in combination with other policies and plans.

9. Appraisal of the Proposed Submission Plan

9.1. Introduction

- 9.1.1. The appraisal is presented below under the SA framework.

9.2. Accessibility (to community infrastructure)

- 9.2.1. The appraisal in Section 6 predicts a neutral effect, acknowledging that whilst there are many positive aspects of there are uncertainties including in terms of schools capacity.
- 9.2.2. With regards to policies:
- Policy SS1 (Swindon’s Spatial Approach to Growth) prioritises growth in Swindon’s Central Area; developing comprehensively planned new communities in well-connected locations; and ensuring new employment land for industrial and warehouse uses is well located in relation to the strategic road network. Supporting this, Policy SS2 (Settlement Hierarchy) sets out that proposals for development will only be supported where they “ensure good accessibility to local services and facilities”.
 - Policy SS1 also sets out that “Development proposals should improve permeability and legibility, including addressing severance created by the railway line and major roads...”. This will ultimately help improve accessibility in the Borough.
 - Numerous site-specific policies – set out clear requirements for onsite community infrastructure. Taking Wichelstowe (Policy SDA06) as an example: *“Development proposals in Wichelstowe will be supported where they deliver or contribute towards community facilities and infrastructure as identified in the Infrastructure Delivery Plan.”*
 - Policies for Highworth (Policy SDA11) and Wroughton (Policy SDA12) – notably state: *“Development proposals should provide a permeable and integrated movement network across the area”*. This includes exploring opportunities to deliver new or enhance existing connections; for Highworth this is to the local schools, leisure facilities and Westrop Surgery, and for Wroughton this is to the Ridgeway School, Wroughton Junior School, and Ridgeway Leisure Centre.
 - Policy HC4 (Accessible Housing) – *“New homes should be designed to be adaptable to the changing needs of households during their lifetime, including ageing, and meet the needs of groups with specific housing requirements.”*
 - Policy ST3 (Accessibility and Development) – *“New Development will be permitted where it takes into account the need for accessibility by all modes and supports the council’s transport objectives...”*

9.2.3. Overall, the proposed policy framework is supported but there is a need for ongoing scrutiny of what can viably be delivered.

9.2.4. In conclusion, a **neutral effect** is predicted for the Local Plan as a whole.

9.3. Air quality

9.3.1. The appraisal in Section 6 predicts a neutral effect, as whilst there are transport challenges these do not necessarily translate into air quality issues.

9.3.2. With regards to policies, whilst none of the strategic policies refer to air quality, Policies SS1 (Swindon's Spatial Approach to Growth) and SS2 (Settlement Hierarchy) support growth in accessible locations. In doing so, they will likely have knock-on benefits for air quality locally by reducing the need for residents to travel further afield via private car.

9.3.3. None of the site-specific policies refer to air quality. However air quality is referenced across the following development management policies:

- Policy ST8 (Transport Assessments, Transport Statements and Travel Plans) – *“Development shall not result in a significant impact on air quality with relevance to developments within or near an existing Air Quality Management Area.”*
- Policy CSE16 (Pollution) – *“All proposals for development must ... ensure noise-sensitive and air quality-sensitive development is directed to appropriate locations, and that they are protected against any existing and proposed sources of noise and air pollution through careful design, layout and use of materials and adequate insulation.”*

9.3.4. In conclusion, a **neutral effect** is predicted for the Local Plan as a whole.

9.4. Biodiversity

9.4.1. The appraisal in Section 6 predicts a ‘moderate or uncertain’ positive effect, as the proposed growth locations are subject to fairly limited biodiversity constraints, and there is clear merit to ensuring plan-led growth. However, SANG capacity is a matter for ongoing scrutiny.

9.4.2. With regards to policies:

- None of the strategic policies refer to biodiversity.
- Several site-specific policies set out that development proposals *“may be required to deliver Suitable Alternative Natural Greenspace (SANG) to mitigate recreational pressures on the North Meadows and Clattinger Farm Special Area Conservation (SAC)”*.
- Policy CSE11 (Biodiversity, Geodiversity and Nature Recovery) – *“Opportunities to conserve, protect, enhance and recover biodiversity and contribute to wildlife and habitats connectivity will be undertaken, including the preservation, restoration and recreation of priority habitats, ecological networks and the protection and recovery of priority species populations...
... Proposals for development ... must demonstrate how they will achieve at least the statutory minimum 10% uplift as calculated by Natural England’s most recent Statutory Biodiversity Metric. Additionally, where statutory net gain is required, proposals should demonstrate that habitat management and monitoring has been secured in perpetuity (minimum of 30 years).”*
- Policy SD1 (High-Quality Design) – sets out that proposals will be expected to “e. nature: protect, enhance, and integrate green and blue infrastructure, delivering measurable biodiversity gains where appropriate”, amongst other considerations.
- Policy SD6 (Residential Extensions and Alterations) – requires “biodiversity is conserved and enhanced, in accordance with Policy CSE11” for proposals for extensions and alterations to residential properties and outbuildings.

- 9.4.3. In conclusion, there is a need for ongoing scrutiny of SANG capacity (which is a matter with a bearing on development viability), but on balance it is appropriate to predict a **'moderate or uncertain' positive effect** for the Local Plan as a whole.

9.5. Climate change adaptation

- 9.5.1. The appraisal in Section 6 predicts a neutral effect, as it appears unlikely that flood risk will be a major issue for bringing forward any of the proposed allocations.
- 9.5.2. With regards to policies:
- None of the strategic policies refer to climate change adaptation.
 - None of the site-specific policies refer to climate change adaptation.
 - Policy CSE1 (Mitigation and Adaptation to Climate Change) – *“Development proposals should incorporate climate adaptation measures that improve resilience and support thermal comfort...”*
 - Policy CSE12 (Managing Flood Risk) – *“Proposals for development must ... avoid and minimise the risk of flooding from all sources and not increase flood risk elsewhere...”*
- 9.5.3. In conclusion, there is scope to confirm that flood risk can be avoided or mitigated through site-specific policy, with a view to ensuring that sites can be successfully and viably delivered without having to compromise on wider objectives, but overall a **neutral effect** is predicted for the Local Plan as a whole.

9.6. Climate change mitigation

- 9.6.1. The appraisal in Section 6 predicts a 'moderate or uncertain' negative effect on the basis that minimising per capita carbon emissions from the built environment is not an issue that has featured strongly as part of the spatial strategy / site selection process.
- 9.6.2. With regards to policies:
- None of the strategic policies refer to climate change mitigation.
 - None of the site-specific policies refer to climate change mitigation.
 - Policy CSE1 (Mitigation and Adaptation to Climate Change) – *“Development proposals are required to provide a Sustainability Statement, proportionate to the scale, nature and complexity of the proposal, to identify potential climate change issues based on site context including site-specific climate impacts, and propose mitigation and adaptation measures aiming to...”*
 - Policy CSE2 (Carbon Reduction and Sustainable Design) – *“All new development should seek to minimise operational and embodied carbon emissions through sustainable design and construction”.*
 - Policy CSE3 (Whole Life Carbon Assessments (WLCA)) – *“Major development proposals over 49 units, or 4,999m² of floorspace are required to undertake Whole Life Cycle Carbon assessments to support their proposals.”*
 - Policy CSE5 (Renewable Energy) – encourages proposals for *“the generation of renewable and low-carbon energy and associated infrastructure”.*
- 9.6.3. In conclusion, the proposal is not to require net zero carbon developments, unlike many local plans nationally, but it is acknowledged that this is on viability grounds, i.e. viability parameters are such that a net zero carbon development requirement would have knock on implications for wider objectives, e.g. affordable housing. Overall, a **'moderate or uncertain' negative effect** is predicted for the Local Plan as a whole.

9.7. Communities

9.7.1. The appraisal in Section 6 predicts a ‘moderate or uncertain’ positive effect, including recognising support for the proposed urban growth strategy, and recognising that the current strategy closely aligns with that previously consulted upon in 2025.

9.7.2. With regards to policies:

- Policy SS1 (Swindon’s Spatial Approach to Growth) – prioritises growth in Swindon’s Central Area; developing comprehensively planned new communities in well-connected locations; and ensuring new employment land for industrial and warehouse uses is well located in relation to the strategic road network. Supporting this, Policy SS2 (Settlement Hierarchy) sets out that proposals for development will only be supported where they “ensure good accessibility to local services and facilities”.
- Site specific policies – clearly prioritise meeting the needs of the local. A specific example is the New Eastern Villages (Policy SDA07): *“The layout and design of development shall establish a distinctive character and identity for each ‘village’, while ensuring that the villages form part of an integrated and cohesive New Eastern Villages neighbourhood with strong visual and physical links between the villages and with Swindon’s Urban Area”*. It is also noted that active travel is a strong focus across the site-specific policies.
- Policy CSE6 (Green Infrastructure in New Developments) – *“Proposals for Major Development will be required to incorporate high quality, accessible, multifunctional green (and blue) infrastructure (GI) in accordance with the latest adopted version of the Swindon Borough Council Green Infrastructure Strategy. All such applications must be accompanied by a Green Infrastructure Statement to demonstrate compliance”*.
- Policy CSE7 (The Green and Blue Infrastructure Network) – seeks to protect, maintain and enhance the Borough’s Green Infrastructure Network.
- Policy HL1 (Health Impact Assessments) – *“All major development proposals will be expected to positively design for creating healthy places with reference to the social, economic, and environmental determinants of health”*. The policy also requires major development proposals to submit a Health Impact Assessment (HIA).
- Policy HL3 (Protecting Open Spaces, Sports and Recreational Facilities) – sets out that the *“Council will protect, maintain and, where possible, enhance existing open space, sports and recreational facilities”*. This includes identifying Open Spaces in the Borough.
- Policy HL4 (Open Space in New Developments) – *“All proposals for major residential development will be required to contribute to the provision of public open space”*.
- Policy HL6 (Community Facilities) – *“Community facilities must be located in accessible locations that are well served by a range of sustainable transport options. Wherever possible, proposals for new community facilities should first be directed to town, district and local centres and be co-located ... with other community uses where possible. If need can be demonstrated for facilities outside of these areas, provision must be located within or adjacent to existing settlements.”*

9.7.3. In conclusion, there is support for the proposed spatial strategy and there is a robust policy framework (subject to ongoing work in respect of viability), such that a **‘moderate or uncertain’ positive effect** is predicted for the Local Plan as a whole.

9.8. Economy and employment

9.8.1. The appraisal in Section 6 predicts a ‘moderate or uncertain’ positive effect, because the proposed strategy closely aligns with the Swindon Economic Growth Plan, albeit there is a need for ongoing scrutiny of proposals for the residential-led redevelopment of two employment sites in the urban area (new allocations since the Regulation 18 stage).

9.8.2. With regards to policies:

- Policy SS1 (Swindon's Spatial Approach to Growth) – seeks to ensure new employment land for industrial and warehouse uses is well located in relation to the strategic road network. It also seeks to safeguard and encourage intensification of the Borough's existing employment areas proportionate to their level of access to key transit corridors. Policy SS1 also sets out that "Development proposals along Regent Street, The Parade and Canal Walk must strengthen these streets as key shopping streets with a variety of shops, cafés and eateries at ground floor level". In addition, "Development proposals along Station Road, Fleet Street and Fleming Way should focus on establishing a commercial quarter that supports the presence of regional and national headquarters as part of a wider strategy to recentralise office uses into the Borough's most accessible and connected location."
- Policy E1 (Economic Strategy and Meeting Employment Needs) – *"Provision will be made to meet the Borough's objectively assessed employment needs for a net increase of 72,000 sqm of office floorspace and 640,000 sqm of industrial and warehousing floorspace over the plan period, along with further replacement provision to cover floorspace lost since the start of the plan period or programmed for release to nonemployment uses as part of the Plan..."*
- Policy E2 (New Employment Sites) – sets out new employment sites in Swindon which will be allocated to meet the needs set out in Policy E1.
- Policy E3 (Designated Employment Areas) – *"Designated Employment Areas ... will be protected for employment uses and related functions, including auxiliary facilities that are in keeping with the scale and intended function of the area."*
- Policy E4 (Employment, Skills and Training) – *"To support the development of employment, skills and training within the Borough the Council will seek a Local Employment and Skills Plans (LESP) on all major housing developments above 100 units and commercial developments above 1,000 sqm metres as part of development proposals."*
- Policies E5 (Network and Hierarchy of Centres), E6 (Development in Town Centres, District / Rural Centres and Local Shopping Parades), and E7 (Evening, Night-time and Cultural Economy) are also relevant to this SA topic.

9.8.3. In conclusion, there is strong support for the proposed strategy and policy framework, including in terms of protecting and intensifying existing employment sites. A **'moderate or uncertain' positive effect** is predicted for the Local Plan as a whole.

9.9. Equality

9.9.1. The appraisal in Section 6 predicts a neutral effect, identifying that a key issue is the proposed strategy for major regeneration of the town centre.

9.9.2. With regards to policies:

- Policy SS1 (Swindon's Spatial Approach to Growth) – prioritises growth in Swindon's Central Area; developing comprehensively planned new communities in well-connected locations; and ensuring new employment land for industrial and warehouse uses is well located in relation to the strategic road network. Supporting this, Policy SS2 (Settlement Hierarchy) sets out that proposals for development will only be supported where they "ensure good accessibility to local services and facilities". This will ultimately help ensure people across the Borough have equal access to services and facilities, employment opportunities and educational facilities.
- Equality is addressed throughout the site-specific policies as they seek to deliver development across the Borough and either deliver new, or provide good access to existing, services and facilities, employment opportunities and educational facilities.
- Policy SD4 (Inclusive Design) – sets out what development proposals must include to achieve high standards of inclusive design.
- Policy HC3 (Affordable Housing) – by seeking to provide at least 30% affordable housing (of which 40% will be Social Rent), this policy will help address inequality.

- Policy HL2 (Concentration of Uses) – *“To reduce health inequality, nuisance and to preserve current and future residential amenity, the Council will resist the over-concentrations of betting shops, adult gaming centres, amusement arcades, pawnbrokers, fast food outlets, hot foot vending vehicles and pay day loan shops.”*
- Other relevant policies include HC4 (Accessible Housing), HC5 (Specialist Housing for Older People), HC9 (Gypsy, Traveller and Travelling Showpeople's Accommodation), ST3 (Accessibility and Development), and ST5 (Improving Public Transport).

9.9.3. In conclusion, the proposed policy framework is supportive of equality objectives hence there is a need to ensure an up-to-date Local Plan is in place and able to set the policy framework for forthcoming planning applications. A **neutral effect** is predicted.

9.10. Historic environment

9.10.1. The appraisal in Section 6 predicts a neutral effect. The town centre growth strategy is a key consideration and it is clear that heritage objectives are a key focus.

9.10.2. With regards to policies:

- Policy SS2 (Settlement Hierarchy) supports proposals for development where they “b. respond positively to the setting, form and character of the settlement through high-quality design, layout and landscaping”.
- Policy SDA01 (Swindon's Central Area) – refers to the “area's rich industrial heritage along with its more modern heritage assets”.
- Policy SDA04 (Windmill Hill) – refers to the “The Windmill” as a non-designated heritage asset as well as the Heritage Impact Assessment (HIA) (2026).
- Policy SDA06 (Wichelstowe) – refers to the “Scheduled Monument of Westleaze Medieval Village”, as well as the route for the Wilts & Berks Canal, which “shall be safeguarded and protected from development”
- Policy SDA07 (New Eastern Villages) – refers to the HIA (2026) and the route for the Wilts & Berks Canal, which “shall be safeguarded and protected from development”. The policy also sets out that: *“Development at South Marston should respond positively to its unique sense of place, its distinctly rural and historic character, and contribute towards the creation of an integrated village”*.
- Policy SDA08 (Kingsdown) – *“Development proposals should establish a distinct sense of place that respects the local vernacular of nearby historic settlements, drawing architectural and material cues from the nearby village of Broad Blunsdon”*.
- Policy SDA09 (North Tadpole) – refers to “Lower Widhill Farm” and the HIA (2026).
- Policy SDA10 (Land adjoining Blunsdon St. Andrew) – refers to the HIA (2026), as well as “Grove Farmhouse, Upper Widhill Farm, Blunsdon St. Andrew Conservation Area and Burcot House”. The policy also sets out that: *“Development shall respond positively to the site's location between Abbey Farm and Tadpole Garden Village, creating a coherent transition between these distinct character areas”*.
- Policy SDA11 (Land at Highworth) – *“Development should be well integrated with the existing settlement, reflecting Highworth's historic settlement pattern...”; and that “Development proposals shall conserve and, where possible, enhance Highworth's historic environment”*.
- Policy SDA12 (Land at Wroughton) – *“Development proposals shall conserve and, where possible, enhance Wroughton's historic environment”*.
- Policy SDA13 (Land at Broad Blunsdon) – *“Development should be well integrated with the existing settlement and reflect Broad Blunsdon's historic settlement pattern...”; and “Development proposals shall conserve and, where possible, enhance Broad Blunsdon's historic environment”*.
- Policy SD7 (Historic Environment) – *“All new development must conserve and where possible enhance the Borough's heritage assets. These include Listed Buildings,*

Conservation Areas, Registered Parks and Gardens, Scheduled Monuments, Non-designated Heritage Assets (including Significant Unscheduled Archaeological Features and archaeological remains)." The policy also covers heritage statements, archaeological features, non-designated heritage assets, 'at risk' heritage assets, the Swindon Heritage Action Zone, and alterations to historic buildings.

- Policy SD8 (Heritage Transport) – sets out how the Wiltshire and Berkshire Canal and the Swindon and Cricklade Railway will be safeguarded to preserve them, as well as setting out proposals for new routes.

9.10.3. In conclusion, heritage is a key focus of site specific policy, which is supported, although there remains scope for added spatial specificity (potentially to include concept masterplans) with a view to ensuring that sites can be viably delivered without having to compromise on historic environment objectives. A **neutral effect** is predicted.

9.11. Homes

9.11.1. The appraisal in Section 6 predicts a 'moderate or uncertain' positive effect, recognising that the plan proposes to set the housing requirement at LHN, including from the start of the plan period, and includes a land supply that should be sufficiently robust, in that it accounts for delivery risks and ultimately will enable the Council to maintain a rolling five year housing land supply over the early years of the plan period.

9.11.2. With regards to policies:

- Policy HC1 (Meeting Local Housing Needs) – *"The housing requirement for the plan area is to provide for at least 1,203 dwellings per annum, or 24,060 dwellings across the 20-year plan period."*
- Policy HC2 (Housing Tenures and Sizes) – *"All residential developments will only be permitted if it encourages a balanced mixed-communities with tenures, types, and house sizes that reflect local housing need in accordance with the latest Local Housing Needs Assessment and in consultation with the Council's Housing department based on the most up to date evidence of need at the time of application."*
- Policy HC3 (Affordable Housing) – *"Major residential development must provide at least 30% affordable housing, of which at least 40% shall be provided as Social Rent housing."*

9.11.3. In conclusion, in addition to the headline considerations in respect of providing for LHN / the housing requirement, a further key consideration is delivering affordable housing. In this regard there is a need to acknowledge that viability is a key constraint to delivering affordable housing, particularly within the town centre. In turn, there is a need to support growth locations with strong viability, as far as possible, and carefully consider the requirements that are placed on developers with cost implications. Overall, a **'moderate or uncertain' positive effect** is predicted for the Local Plan as a whole.

9.12. Landscape

9.12.1. The appraisal in Section 6 predicts a 'moderate or uncertain' positive effect as the proposed growth locations are overall subject to limited constraint and there is a need to ensure plan-led growth / avoid ongoing growth under 'the presumption'.

9.12.2. With regards to policies:

- Policy SS2 (Settlement Hierarchy) supports proposals for development where they "b. respond positively to the setting, form and character of the settlement through high-quality design, layout and landscaping". The policy also sets out that "Areas of non-coalescence ... will be maintained to protect the separate identity of settlements and retain the open and rural character of the land".
- Policy SDA02 (Pipers Way Urban Regeneration Area) – "Development proposals should utilise and enhance open space and green infrastructure, including the wooded areas along Pipers Way and surrounding site parcels".

- Policy SDA03 (Marlowe Avenue Urban Regeneration Area) – “Development proposals should utilise and enhance open space and green infrastructure, including the retention and expansion of the allotments, strengthening landscape buffers along Marlowe Avenue, Drakes Way and Dorcan Way and introducing street trees, including tree avenue planting along Greenbridge Road”.
- Policy SDA06 (Wichelstowe) – “Development at Wichelstowe shall protect and enhance the North Wessex Downs National Landscape and views from it”.
- Policy SDA07 (New Eastern Villages) – development will need to “incorporate a network of multifunctional green corridors within and between development parcels”; “complement and respond positively to New Eastern Village’s landscape character, including the views and setting of North Wessex Downs National Landscape”, and “retain separation from Wanborough, Bishopstone and Bourton through retention of the Area of Non-Coalescence”. In addition, “lower density development shall be located on the rural edges of development parcels, creating a graduated transition between the villages and the open countryside”.
- Policy SDA08 (Kingsdown) – development will need to “respect the area’s landscape setting and character”, “ensure that it retains separation from Broad Blunsdon, avoiding development in the Area of Non-Coalescence”, and “be landscape-led, with built form integrated into the existing landscape structure and retaining key features such as woodland, hedgerows and Bydemill Brook”. In addition, development should “provide a sensitive transition to the open countryside through appropriate scale, density, landscaping and open space, particularly on development edges, and the retention of key views”. Finally, development should “respond sensitively to the character of the nearby village of Broad Blunsdon and provide a sympathetic transition between the village and Swindon’s urban area”.
- Policy SDA09 (North Tadpole) – development will need to “complement and respond to North Tadpole’s landscape setting and character and “provide a sensitive transition to the open countryside through appropriate scale, density, landscaping and open space, particularly on development edges, and the retention of views to the countryside”.
- Policy SDA10 (Land adjoining Blunsdon St. Andrew) – “Proposals for development are expected to be of an appropriate scale and density for an extension to Swindon’s Wider Urban Area. Density should transition gradually from the built-up area towards the countryside, using retained and new hedgerows, planting and other green buffers, to create a sensitive edge to the countryside.”.
- Policy SDA11 (Land at Highworth) – development should be “well integrated with the existing settlement, reflecting Highworth’s ... landscape setting” and on extension sites development should “take a landscape-led approach that reads as a natural continuation of Highworth”.
- Policy SDA11 (Land at Highworth) – “Proposals for development on the extension sites are expected to be of an appropriate scale and density for a Rural Service Centre extension. Density should transition gradually from the built-up area towards the countryside, using retained and new hedgerows, planting and other green buffers, to create a sensitive edge to the countryside”.
- Policy SDA12 (Land at Wroughton) – development should be “well integrated with the existing settlement and reflect Wroughton’s historic settlement pattern, vernacular architecture and landscape setting...”. It must also retain “separation between Wroughton and the M4 to retain Wroughton’s identity as a distinct settlement...”. Moreover, development should “protect and where possible enhance Wroughton’s landscape setting and responding positively to the landscape character and the views and setting of the North Wessex Downs National Landscape”. Finally, “Proposals for development are expected to be of an appropriate scale and density for a Rural Service Centre extension. Density should transition gradually from the built-up area towards the countryside, using retained and new hedgerows, planting and other green buffers, to create a sensitive edge to the countryside”.

- Policy SDA13 (Land at Broad Blunsdon) – development should be “well integrated with the existing settlement and reflect Broad Blunsdon’s ... agricultural setting, taking a landscape-led approach that reads as a natural continuation of Broad Blunsdon”. In addition, it should “frame key views towards the surrounding countryside and maintain visual connections to the rural landscape” and “ensure that it retains separation between the village of Broad Blunsdon and north Swindon’s urban area and land allocated to the east at Kingsdown”. Finally, “Proposals for development are expected to be of an appropriate scale and density for a Village extension. Density should transition gradually from the built-up area towards the countryside...”.
- Policy CSE7 (The Green and Blue Infrastructure Network) – “2. Development that would sever or diminish the value (which can include Placemaking / Ecological and Landscape value) of a Green Infrastructure corridor will not be permitted. Also of relevance in relation to this is CSE6 (Green Infrastructure in New Developments).
- CSE9 (Woodland, Trees and Hedgerows) – seeks to protect and enhance trees, hedges and woodlands and sets a future canopy cover of at least 25% of major development sites. The policy also highlights that ancient woodland, ancient trees, veteran trees and trees of local / landscape value should be retained.
- Policy CSE8 (Great Western Community Forest) – sets out that major development proposals must be consistent with the objectives of the Great Western Community Forest (GWCF) Plan. This includes ensuring that there is a “net increase in tree cover (in line with Policy CSE9) through an appropriate contribution to the planting of a meaningful quantum of new woodland and trees of landscape significance...”.
- Policy CSE10 (Landscape) – seeks to conserve and enhance the Borough’s landscape character and sets out requirements for Landscape Visual Impact Assessments (LVIAs). The policy also details how the North Wessex Downs National Landscape (located to the south / southeast of Swindon) will be conserved and enhanced.

9.12.3. In conclusion, in addition to support for the proposed strategy there is also a robust policy framework, hence a **‘moderate or uncertain’ positive effect** is predicted.

9.13. Soils and resources

9.13.1. The appraisal in Section 6 predicts a neutral effect as there will be limited loss of best and most versatile agricultural land.

9.13.2. With regards to policies:

- Policy SS1 (Swindon’s Spatial Approach to Growth) supports the efficient use of resources by focusing development in the wider urban area, prioritising the redevelopment of underutilised brownfield land.
- Policy CSE4 (Adaptive Reuse and Retrofit) – “Development proposals are encouraged to consider adaptive reuse and retrofitting of existing assets if viable and in accordance with Policy CSE 1, CSE 2 and CSE3.”
- Policy SD1 (High-Quality Design) – “i. resources: conserve natural resources including land, water, energy and material, and respond to the impacts of climate change by ensuring energy efficient and minimising carbon emissions, in accordance with the policies set out in chapter 8 of the Local Plan.”
- Policy CSE4 (Adaptive Reuse and Retrofit) – highlights the importance of reusing built assets to help preserve resources used for initial construction.
- Policy CSE15 (Contaminated Land) – sets out criteria which must be met for proposals for development on land that is contaminated / suspected of being contaminated to be permitted.

9.13.3. In **conclusion**, a neutral effect is predicted for the Local Plan as a whole.

9.14. Transport

9.14.1. The appraisal in predicts a neutral effect because, whilst there are many positive aspects of the proposed strategy, there are also residual risks and uncertainties.

9.14.2. With regards to policies:

- Policy SS1 (Swindon's Spatial Approach to Growth) performs well by prioritising growth in Swindon's Central Area; developing comprehensively planned new communities in well-connected locations; and ensuring new employment land for industrial and warehouse uses is well located in relation to the strategic road network. Supporting this, Policy SS2 (Settlement Hierarchy) sets out that proposals for development will only be supported where they "ensure good accessibility to local services and facilities".

In addition, Policy SS1 sets out that, with regard to streets, "pedestrian movement, cycling and public transport will be supported and vehicular movement managed so that it is not the most dominant part of the street scene".

Finally, Policy SS1 sets out that "Development proposals should improve permeability and legibility, including addressing severance created by the railway line and major roads...". This will ultimately help improve accessibility in the Borough.

- Policy SDA02 (Pipers Way Urban Regeneration Area) – "Proposals are expected to contribute to ensuring the gateway to the Pipers Way SDA from the junction with Croft Road is legible, providing intuitive arrival by utilising landscape markers and material cues up to the northern end of Pipers Way".
- Policy SDA03 (Marlowe Avenue Urban Regeneration Area) – "Proposals should consider connections to the public transport network, taking advantage of the SDA's strategic position along a Key Transit Corridor".
- Policy SDA04 (Windmill Hill) – "Development proposals should provide a permeable and integrated movement network across the area, including exploring opportunities to deliver new or enhance existing connections to Freshbrook, Shaw Ridge Retail Park and Lydiard Country Park, and to Swindon town centre".
- Policy SDA05 (Gateway North) – "Development proposals should provide a permeable and integrated movement network across the area, including exploring opportunities to deliver new or enhance existing connections to amenities east of Northern Gateway and to residential areas at Blunsdon and north towards Abbey Stadium". In addition, "Development proposals should look to overcome severance at Gateway North by providing direct road and active travel routes to Salzgitter Drive".
- Policy SDA07 (New Eastern Villages) – "Development proposals should deliver a strategic link between the Southern Connector Road and the A420". In addition, "Development proposals should incorporate connections to the public transport network and maximise on the New Eastern Villages' strategic position on a Key Transit Corridor". Finally, "Development proposals shall deliver active travel infrastructure and connections to East Swindon and towards the town centre".
- Policy SDA08 (Kingsdown) – "Development proposals should demonstrate how they connect to and support the public transport network, benefitting from the SDA's strategic position on a Key Transit Corridor". In addition, "Proposals will be expected to provide active travel connections to Broad Blunsdon and, via the bridge crossing, to Swindon's Urban Area". Finally, "Proposals should retain, enhance and extend Public Rights of Way where appropriate, including connections to Stratton Wood".
- Policy SDA09 (North Tadpole) – "Development proposals should incorporate safe and appropriate accesses to the A419 and William Morris Way". In addition, "Development proposals should provide a permeable and integrated movement network across the site, including exploring opportunities to deliver new or enhance existing connections to Tadpole Garden Village, Broad Blunsdon, Land adjoining Blunsdon St. Andrew and the National Cycle Network". Finally, "Development proposals should incorporate connections to the public transport and active travel network".

- Policy SDA10 (Land adjoining Blunsdon St. Andrew) – “... incorporate an appropriate and safe access off Tadpole Lane.”; “Development proposals should provide a permeable and integrated movement network across the site, including exploring opportunities to deliver new or enhance existing connections to Tadpole Garden Village, North Tadpole and the National Cycle Network.”; and “Development proposals should incorporate connections to the public transport and active travel network.”
- Policy SDA11 (Land at Highworth) – “Development proposals should demonstrate how they connect to and support the public transport network, benefitting from the SDA’s strategic position on a Key Transit Corridor”.
- Policy SDA12 (Land at Wroughton) – “Development proposals should deliver active travel connections to Swindon Town Centre and Wichelstowe”; and “Development proposals should demonstrate how they connect to and support the public transport network, benefitting from the SDA’s strategic position on a Key Transit Corridor”.
- Policy ST1 (Spatial Vision: A Well-Connected Swindon) – sets out key priorities which development proposals should demonstrate to show that they support and enhance a sustainable and well-connected transport system for Swindon.
- Policy ST2 (Promoting Sustainable Transport) – “1. All development proposals must plan for and support the delivery of an integrated multi-modal transport network, applying the sustainable transport hierarchy to prioritise movement...”
- Policy ST5 (Improving Public Transport) – seeks to build a transport network that is “universally accessible to all people in all corners of the Borough, linking core routes with Demand Response Transport strategies with accessibility at its heart.” This includes prioritising major proposals identified in the Bus Improvement Plan; supporting Park and Ride infrastructure; and promoting access to the rail network.
- Policy ST6 (Highway Improvements) – sets out key highway improvements derived from the Transport Impact Assessment and associated modelling.
- Other relevant policies include ST3 (Accessibility and Development), ST4 (Transport Infrastructure Design), ST7 (Freight and Logistics), ST8 (Transport Assessments, Transport Statements and Travel Plans), and ST9 (Parking and EVs).

9.14.3. In conclusion, a neutral effect is predicted for the Local Plan as a whole. It will be important to confirm that the plan remains sound in light of the forthcoming TIA.

9.15. Water

9.15.1. The appraisal in Section 6 predicts a moderate or uncertain negative effect as there are some likely challenges in respect of sewage treatment works capacity.

9.15.2. With regards to policies:

- None of the strategic policies refer to water.
- Policy SDA07 (New Eastern Villages) – “Development shall be embedded with green and blue infrastructure including through the integration of the River Cole and other waterways as key landscape features and components of the public realm, while protecting and enhancing their ecological quality and connectivity”.
- Policy CSE13 (Protection and Enhancement of the Water Environment) – sets out the measures to be taken to continue to protect and enhance river corridors to ensure local water bodies meet good ecological status.
- Policy CSE16 (Pollution) – outlines that development proposals must be designed to reduce adverse impacts from pollution, and avoid creating new impacts on several receptors, including the water environment.
- Policy INF2 (Wastewater, Sewage Infrastructure and Water Supply) – promotes water efficiency as a key measure for managing the increasing demand for water.

9.15.3. In conclusion, a **‘moderate or uncertain negative effect’** is predicted.

Part 3: Next steps

10. Plan finalisation

- 10.1.1. Once the period for representations on the Local Plan / SA Report has finished the intention is to submit the plan for examination in public alongside a summary of the main issues raised through the Regulation 19 publication period. The Council will also submit the SA Report.
- 10.1.2. At examination one or more Government-appointed Inspector(s) will consider representations before identifying modifications necessary for soundness. Modifications will then be prepared (alongside SA if necessary) and subjected to consultation (alongside an SA Report Addendum if necessary).
- 10.1.3. Once found to be 'sound' the Local Plan will be adopted. At the time of adoption a 'Statement' must be published that sets out (amongst other things) "the measures decided concerning monitoring".

11. Monitoring

- 11.1.1. The requirement here is to present "measures envisaged concerning monitoring".
- 11.1.2. A focus might be on monitoring the delivery of a selection of key proposed allocations, with a view to flagging both: A) sites that are not coming forward in accordance with the anticipated trajectory (i.e. sites are delayed or are not delivering to the anticipated capacity); and B) sites that are coming forward with compromises made in terms of policy objectives. Specific considerations for future monitoring might include:
 - Accessibility – are sites delivering community infrastructure or contributions as anticipated?
 - Biodiversity – are sites delivering 10% BNG?
 - Climate change adaptation – is flood risk affecting the delivery of any allocations and what steps are being taken to avoid and mitigate risk accounting for climate change?
 - Climate change mitigation – are any sites delivering as net zero developments?
 - Economy & employment – are key sites delivering or progressing towards delivery as anticipated? In general, employment land needs warrant regular monitoring as this will be an important consideration for a future local plan review. There is a clear case for work to explore employment land needs/opportunities at a larger-than-local scale.
 - Historic environment – are sites able to avoid and mitigate impacts to key assets in the manner envisaged by site-specific policies? What effect are HIA having?
 - Homes – are sites delivering the full policy quota of affordable housing?
 - Transport – are sites able to deliver the transport upgrades envisaged by policies and as set out in the Infrastructure Delivery Plan?
 - Water – is site delivery being impacted by uncertainties in respect of water supply / resources or capacity at wastewater treatment works?

Appendix I: Regulatory requirements

As discussed in Section 1, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the SA Report. However, interpretation of Schedule 2 is not straightforward. Table A links the structure of this report to an interpretation of Schedule 2, whilst Table B explains this interpretation (N.B. this current report is an Interim SA Report, as opposed to the SA Report, but nonetheless aims to present the information required of the SA Report). Table C then presents a discussion of more precisely how the information in this Interim SA Report reflects the requirements for the SA Report.

Table A: Questions answered by this Interim SA Report, in-line with an interpretation of regulatory requirements

Questions answered		As per regulations... the SA Report must include...
Introduction	What's the plan seeking to achieve?	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
	What's the sustainability 'context'?	- Relevant environmental protection objectives, established at international or national level - Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
	What's the SA scope?	- Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan - The environmental characteristics of areas likely to be significantly affected - Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
	What are the key issues and objectives that should be a focus?	Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
Part 1	What has plan-making / SA involved up to this point?	- Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) - The likely significant effects associated with alternatives - Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan
Part 2	What are the SA findings at this current stage?	- The likely significant effects associated with the draft plan - The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan
Part 3	What happens next?	A description of the monitoring measures envisaged

Table B: Interpreting Schedule 2 and linking the interpretation to the report structure

Schedule 2	Interpretation of Schedule 2	
The report must include...	The report must include...	
(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the plan seeking to achieve?</i>
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'context'?</i>
(c) the environmental characteristics of areas likely to be significantly affected;	The relevant environmental protection objectives, established at international or national level	
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	i.e. answer - <i>What's the 'baseline'?</i>
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The environmental characteristics of areas likely to be significantly affected	
(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What are the key issues & objectives?</i>
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Key environmental problems / issues and objectives that should be a focus of appraisal	
(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach')	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the Report]
(i) a description of the measures envisaged concerning monitoring.	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.	
	The likely significant effects associated with the draft plan	i.e. answer - <i>What are the assessment findings at this current stage?</i> [Part 2 of the Report]
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan	
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> [Part 3 of the Report]

Table C: ‘Checklist’ of how and where (within this report) regulatory requirements are reflected.

Regulatory requirement	Information presented in this report
a) The report must include: An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Section 2 (‘What’s the plan seeking to achieve’) presents this information.
b) The report must include: The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	Matters (b), (c) and (d) were considered in detail at the scoping stage, which included consultation on a Scoping Report. The outcome of scoping was an ‘SA framework’, which is presented within Section 3. The SA scope is then discussed within the appraisal sections as appropriate, i.e. in light of the options and proposals that are a focus.
c) The report must include: The environmental characteristics of areas likely to be significantly affected;	As above
d) The report must include: ... environmental problems which are relevant... areas of a particular environmental importance...;	As above
e) The report must include: The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	The Scoping Report presented a detailed context review and explained how key messages from this (and baseline review) fed into the ‘SA framework’, which is presented within Section 3. Also, information on the SA scope is presented as part of appraisal work in Sections 6 and 9. With regards to explaining “ <i>how... considerations have been taken into account</i> ”, Section 7 explains reasons for supporting the preferred option, i.e. how/why the preferred option is justified in-light of alternatives appraisal.
f) The report must include: The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.	Section 6 presents alternatives appraisal findings, whilst Section 9 presents an appraisal of the current draft version of the Local Plan as a whole. All appraisal work naturally involved giving consideration to the SA scope and the various effect characteristics.
g) The report must include: The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan...	Section 9 presents recommendations but perhaps more importantly flags ‘tensions’ that can be a focus of further work ahead of plan finalisation.
h) The report must include: An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Sections 4 and 5 deal with ‘reasons for selecting the alternatives dealt with’. Section 7 explains ‘reasons for supporting the preferred approach’, i.e. explains how/why the preferred approach is justified in-light of the alternatives appraisal. Methodology is discussed at various places, ahead of presenting appraisal findings.
i) The report must include: ... measures envisaged concerning monitoring;	Section 11 presents this information.
j) The report must include: A non-technical summary... under the above headings	The NTS is presented at the start of this report.
The SA Report must be published alongside the draft plan. Specifically: Authorities... and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan... and the accompanying environmental report before the adoption of the plan...	This Interim SA Report is published alongside a draft version of the Local Plan in order to inform the consultation and then subsequent plan finalisation.
The SA Report must be taken into account, alongside consultation responses, when finalising the plan. Specifically: The environmental report prepared pursuant to Article 5 [and] the opinions expressed pursuant to Article 6... shall be taken into account during the preparation of the plan... and before its adoption or submission to the legislative procedure.	This Interim SA Report will be taken into account when finalising the plan for publication (see Section 10).

Appendix II: The SA scope

Set out below is the SA framework in full as established in 2023 (see discussion in Section 3, above).

SA topic	SA objective
Accessibility	Support accessibility to community infrastructure, including by delivering infrastructure enhancements - including strategic infrastructure, e.g. new schools and health hubs - that deliver benefits to existing as well as new communities ('planning gain').
Air quality	Take steps to locate, design and deliver development so as to avoid air pollution (NO ₂ and PM _{2.5}) and support the achievement of air quality objectives, including within the one AQMA.
Biodiversity	Conserve and enhance designated sites, in accordance with their significance, and also account for non-designated habitat and known priority areas, applying the mitigation hierarchy (avoid, mitigate, compensate). Take a landscape-scale approach to biodiversity, focused on a nature recovery networks and resilience, and a strategic approach to Biodiversity Net Gain.
Climate change adaptation	Avoid vulnerable uses in flood risk zones and plan strategically for flood risk to ensure flood risk is reduced across the Borough, taking into account the impacts of climate change. Also ensure the resilience of communities, the economy and infrastructure to wider climate change impacts, including overheating. Linked to biodiversity objectives, support restoration of natural processes and avoid actions that impact the natural environment's resilience.
Climate change mitigation	Contribute to radical reductions in per capita emissions from both transport and the built environment, in line with 'net zero' targets. This should include consideration of 'net zero developments', and strategic consideration of matters relating to renewable heat and electricity generation, transmission and storage. Also, support larger scale renewable energy schemes (e.g. solar farms) and carbon sequestration (e.g. new woodlands, carefully located).
Communities and health	Support wide-ranging objectives (beyond community infrastructure-related; see above), including addressing known issues in respect of determinants of health. Amongst other things, support: active travel; access to green/blue infrastructure, sports pitches/facilities and other recreational facilities; a hierarchy of vibrant and resilient centres that serve a range of functions; reducing issues of relative deprivation, including through targeted regeneration initiatives (also see discussion below under 'Equalities'); and a strategic approach to masterplanning and design e.g. use of agreed design codes.
Economy & employment	Meet the full range of employment land needs and more widely reflect the objectives set out in the NPPF, including boosting productivity. Build on local strengths (e.g. advanced manufacturing), counter any weaknesses (e.g. a town centre in need of regeneration) and address the challenges of the future, including guided by higher level strategy. Recognise Swindon's unique role at the intersection of the South West (e.g. Western Gateway sub-region) and South East (e.g. England's Economic Heartland Sub-region).
Equalities	Plan for Swindon's diverse communities and, in particular, reduce inequality experienced by individuals and groups with protected characteristics. Address relative deprivation as it can be a proxy for equalities issues and given good understanding of how relative deprivation varies spatially across the Borough at strategic scales most relevant to preparation of the local plan. Ensure ongoing evidence gathering around key strategic issues / opportunities.

SA topic	SA objective
Historic environment	Conserve and enhance the historic environment, with a focus on designated assets, but also non-designated assets (including archaeology). Account for specific factors that make an asset or area valuable in historic environment terms, for example, and notably, industrial and railways heritage in the Swindon context. Consider links to character, sense of place and place-making.
Housing	Provide for objectively assessed housing needs (or Local Housing Need, LHN) in line with NPPF paragraphs 11 and 61. Provide for affordable housing and specialist housing / accommodation to meet needs, ensure an appropriate housing mix in terms of size, type and tenure, consider locally rising needs within the Borough and also ensure a focus on delivery / minimising delivery risks.
Landscape	Recognise broad variation in topography, geology, land use and landscape - e.g. raised landscapes versus river valleys - and the relationship to historic and potential future settlement / built form. Protect and enhance the character, quality and setting of valued landscapes at all scales, accounting for varying significance including the nationally significance of the North Wessex Downs. Recognise links to wider objectives (e.g. biodiversity, green infrastructure, heritage). Support comprehensive masterplanning with a long-term perspective and strategic green infrastructure.
Soils and resources	Ensure efficient use of land including a focus on avoiding the loss of best and most versatile (BMV) agricultural land, as far as possible, particularly better quality BMV land. Support minerals and waste planning and seek to reflect circular economy principles.
Transport	Support the achievement of 'modal shift', including through the location and design of development, and support for strategic or otherwise coordinated growth locations. Support the Local Transport Plan, for example in respect of transport infrastructure upgrades, addressing congestion hotspots (and, in turn, supporting public and active transport) and future mobility. Recognise close links to 'accessibility' objectives and - particularly within the main urban area - ensure an integrated approach in terms of targeted growth at centres and along key corridors, e.g. new homes to support new infrastructure.
Water	Direct growth to minimise pressure on water resources and water quality, including accounting for wastewater treatment capacity and any water resource zones associated with particular water stress. Realise opportunities for growth to support new infrastructure.

