

**New Eastern Villages Island Bridge Vision
Supplementary Planning Document**

Statement of Consultation

June 2017

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1. Introduction

- 1.1 This consultation statement has been prepared in accordance with Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The statement sets out who was consulted on the draft New Eastern Villages (NEV) Island Bridge Vision Supplementary Planning Document (SPD).

2. Purpose

- 2.1 In accord with the Swindon Borough Local Plan 2026 (Local Plan) and in particular Policy NC3, the SPD seeks to assist with the delivery of a series of new inter-connected distinct villages through new road, pedestrian and cycle infrastructure. Additionally the SPD will help ensure that:
- the risk of flooding from the development is minimised, both within the development and at existing neighbouring communities in accordance with Policy EN6;
 - biodiversity, including the River Cole Corridor and River Cole Meadow County Wildlife Sites, is protected, integrated and enhanced; and
 - the route for the Wilts & Berks Canal as set out on the Policies Map will be safeguarded and protected from development.

3. When did consultation take place?

- 3.1 Public consultation on the draft SPD took place between Monday 20th February 2017 and Monday 3rd April 2017. A total of 20 responses were received; generating 86 comments.

4. Who was consulted?

- 4.1 In accord with the Town and Country Planning (Local Planning) (England) Regulations 2012, all statutory consultees and interested parties were notified of the public consultation.
- 4.2 A formal public notice was made available in the locally distributed newspaper, together with publication on the Swindon Borough Council website, and hard copies of documents were made available at all libraries and Parish / Town Councils within the Borough.

5. Summary of the Main Issues Raised

- 5.1 The following paragraphs seek to summarise some of the main comments made. However, due to the high number of responses received, it is not appropriate to detail all of them within this Statement of Consultation. A table

of detailed comments made along with Officer responses are provide as a separate attachment to this document (Appendix A).

Stakeholder Responses

5.2 Comments were received from stakeholders including:

- Hannick Homes, Hallam Land and Taylor Wimpey (DLA)
- Barberry Ltd
- Wasdell Properties Ltd
- Environment Agency
- Historic England
- Covingham Parish Council
- Liddington Parish Council
- Stratton St Margaret Parish Council
- Wanborough Parish Council
- Wilts & Berks Canal Trust

Comments from Land Owners, Strategic Land Promoters and Developers

5.3 In summary, the main points submitted by **David Lock Associates (on behalf of Hannick Homes, Hallam Land and Taylor Wimpey)** related to the following:

- It is clear that the draft SPD does not seek to prescribe an approach to the design nor implementation of structures to the north of the A420, within the land currently subject of a planning application by HHT. HHT support this approach.
- HHT wish to raise a number of issues and make a number of comments in relation to the document as currently drafted. In terms of the issues raised, HHT consider that:
 - the Draft SPD is not consistent with the planning context in which it sits;
 - the Draft DPD exceeds the scope that is appropriate in a Supplementary Planning Document by seeming to draft new policy appearing prescriptive in approach without considering

the reasonableness of the impact on the financial burdens on the development;

- the draft SPD does not clearly articulate its evidence base.
- Local Plan Policy NC3 does not refer to the creation of Island Bridges, either as part of the expanded policy, nor explanatory text. Part d) refers to the Canal, but simply implies a policy aspiration that its route, as set out the Policies Map, will be safeguarded and protected from development. There isn't reference to it performing a flood risk mitigation function to be embedded within the wider masterplanning of the NEV or it being essential infrastructure for the development.
- HHT consider that:
 - The document is drafting new policy – to prescribe particular solutions and approaches – that exceed the obligations or expectations of national or local planning policy;
 - The prescribed solutions and approaches add to the financial burdens of the development and that they do so unnecessarily as structures will meet the expected outcomes of policy in respect of design, flood risk, drainage, green infrastructure – without the level of prescription and costs assumed in the SPD;
 - The document does not readily allow for the outcome of the detailed refinement of the development islands a matter on which the Local Plan is clear should be afforded flexibility to be shaped through the development management process.
 - For these reasons, also it is unsound to adopt the guidance as set out.
- Testing a bridge structure against a 1 in 1000 year event is not supported in national policy nor guidance, and applies an onerous level of prescription that will increase construction costs which could threaten the viability of schemes. There is no evidence for such an approach.
- Much of the NEV is still subject to masterplanning as development proposals progress, and whilst the NEV Illustrative Masterplan is now adopted as part of the NEV Planning Obligations SPD, it is clear that the Masterplan itself will continue to evolve as proposals are brought forward and detailed site investigations are undertaken (paragraph 2.3.5). In particular there is no agreed policy or master plan basis - including in the NEV SPD - as to the details of the movement and route hierarchy - including the nature of each road link, the widths

appropriate in particular to the lower levels of the hierarchy and the need for shared cycle/footways as set out in the Draft SPD in relation to each level of the route hierarchy or in relation to the specific location and function of a route and crossing. The references in paragraphs 5.2.2-5.2.4 to specific dimensions or specific highway cross sections should therefore not be included in the SPD. If necessary principles and design process should be described - as opposed to detailed and singular requirements. Furthermore, the specific dimensions, highway cross sections and design requirements proposed in the SPD, have significant construction costs which could threaten the viability of schemes. The Draft Island Bridge SPD is seeking to apply prescription to design parameters that are deliberately kept flexible. This approach is contrary to the approach taken in the Local Plan and national guidance.

- The SPD does not evidence these costs, in the document, nor its appendices, nor does it demonstrate the calculation undertaken in reaching these estimates. It is therefore not possible to deduce the acceptability or otherwise of these costs and their implications on development viability. Indeed, any requests for financial contributions in respect of the provision of this infrastructure cannot be examined against the CIL tests as is required under national guidance.

The Council's Response

- 5.4 The SPD seeks to provide guidance on the design of all bridges within the NEV, amendments have further clarified this within the document. The Planning Obligations SPD outlines the required infrastructure for all development islands and the current costs associated with bring this infrastructure forward. The delivery of bridge infrastructure and level of contributions from each application will be assessed on their merits.
- 5.5 This SPD provides additional details to the relevant policies of the Local Plan, particularly NC3 and the NEV Planning Obligations SPD. The provision of this infrastructure is considered essential to the delivery of the NEV and therefore represents a necessary and reasonable infrastructure request.
- 5.6 Policy NC3 seeks to ensure the "form of the development shall comprise a series of new inter-connected distinct villages...". Due to existing constraints such as flood risk, bridges are required at certain locations to form the links between these villages. Policy NC3 also requires the route for the canal to be safeguarded, it therefore must be given consideration through the delivery of other infrastructure. The SPD does not seek enforce the use of the canal as flood mitigation, but outlines the potential opportunities it could represent. The use of the canal as a flood mitigation measure should not be relied upon

during the consideration of other applications and will be assessed at the detailed design/application stage of the canal.

- 5.7 The Local Planning Authority (LPA) disagree that the SPD drafts new policy and consider it to provide additional detail on the policies within the Local Plan, particularly NC3. It sets out the framework for the connectivity between development islands and provides guidance on the likely technical and design requirements required to implement these links.
- 5.8 The SPD seeks to provide guidance on the technical specifications and design for bridges. NPPF para 16 states *"The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people"*. The guidance is not considered excessively prescriptive, nor does it seek to add unreasonable financial burden on developers.
- 5.9 The 1 in 1000 year flows were used as the increase to the bridge size was minimal compared to the requirement for the 1 in 100 plus 20% climate change flows. However, the EA require the new climate change allowances to be applied to these bridges which is a 70% increase. These calculated flows are in line with the 1 in 1000 year flows and therefore remain an important part of the document as they will inform the future design of these structures.
- 5.10 The proposed cross-sections and route hierarchy within the SPD is based upon likely traffic generation and travel direction for carriageway widths, and likelihood of increased cycle and pedestrian activity as routes get closer to the secondary school and the district centre. These anticipated widths may evolve as detailed design progresses, however their basis lies in guidance from Design Manual for Roads and Bridges (DMRB), Manual for Streets (MfS), Manual for Streets 2 (MfS2) and Sustrans Design Manual, alongside local highway knowledge and consultation with Swindon's Bike User Group, and alterations are anticipated to be minimal. Furthermore, the necessity to include widths is predicated by the requirement to determine infrastructure cost, without which, meaningful S106 discussions could not be concluded.
- 5.11 The intention of the SPD is to outline the necessary bridge infrastructure and the likely programme required to deliver them. The construction of the bridges or financial contributions required to build them will be sought through S106 contributions. Whilst initial work has been done on the estimated costs, additional assessments are proposed to ensure the costs are accurate and reflect the required detailed design for the proposed bridge structures. Any updated costs would be reflected within the update to the NEV Infrastructure Delivery Plan (IDP), which forms part of the NEV Planning Obligations SPD.

In summary, comments made by **Harris Lamb (on behalf of Barberry Limited)** related to the following:

- The final costing of any individual element will need to be agreed between the Council and Applicant, and will have an impact upon the viability of a particular phase. This point should be referred to in the document.

The Councils Response

5.12 The SPD outlines the framework for the provision of links between development islands. Further work is underway to provide accurate cost estimates and any updated figures would be reflected in an update to the NEV Infrastructure Delivery Plan (IDP), which forms part of the NEV Planning Obligations SPD. The detailed costs for each item of infrastructure, contributing towards the comprehensive development of the NEV, will be established at the detailed design stage and will inform detailed S106 discussions with each developer.

5.13 In summary, comments made by **Turley (on behalf of Wasdell Properties Ltd)** related to the following:

- The draft SPD would benefit from a short statement confirming explicitly that it applies only to land included within the New Eastern Villages allocation.
- It is important that the SPD clearly articulates the need for flexibility for the canal route, even whilst the routes (as broadly illustrated) continue to be safeguarded. Ultimately, it is the delivery of the SCR and canal which is of importance, rather than their specific alignment.
- The draft SPD should be clear in stating that these requirements shall not be taken to apply to land outside of the New Eastern Villages allocation. Our client would not wish any future crossing at Pack Hill defined as a Village Vehicular Access Way, as this would prejudice the scope for achieving their proposed development.

The Councils Response

5.14 This SPD refers to the direct links with the relevant policies of the Local Plan and the NEV Planning Obligations SPD; it is therefore not considered necessary to add any further statements to this effect.

5.15 The indicative route on the Policies Map illustrates the broad alignment of the canal; however this may need to be altered due to unknown site specific constraints, which may come to light through the detailed design stage. Until this stage, sites should safeguard this indicative alignment as well as the

Southern Connector Road (SCR) route from development to ensure a comprehensive approach towards the delivery of the NEV.

- 5.16 Officers consider the Local Plan policies to provide sufficient detail for the canal and SCR alignments, and therefore do not consider it to be necessary to provide further clarity in this SPD. The SPD seeks to provide guidance on the technical requirements and design of bridges between development islands. The detailed design and specification of each item of infrastructure will be determined through the planning process.

Comments from Statutory Consultees

- 5.17 In summary, comments made by the **Environment Agency** related to the following:
- The climate change allowances were revised, so the new allowances should be used within this assessment. Previously, the Environment Agency (EA) asked for abutments to lie outside of the 1 in 100 year plus climate change extent (20% at the time), however this led to large, unviable structures. As the new structures may encroach into the 1 in 100 year plus climate change extent, we request that an assessment is made with the new allowances.
 - Following Thames Area Climate Change Guidance, essential infrastructure requires a detailed assessment (hydraulic modelling) for all development types, in flood zones 2, 3a and 3b. However, we note that this SPD is still quite high level and so we would initially suggest an interpolation exercise, as per the guidance, is performed to establish the new climate change allowance with detailed modelling performed at the planning application stage.
 - Following on from this, please note, as part of the planning process we would expect to see a more detailed assessment demonstrating the following:
 - Any loss of floodplain storage and compensation required within 1% AEP with an allowance for climate change
 - That any structure does not impede floodwaters
 - That there will be no increase in flood risk elsewhere.
 - Another concern that has been raised is the impact of the small section of two stage channel under the bridge. This may need more detailed assessment at the planning stage, potentially through hydraulic modelling. Although included within the guidance, this could only be

implemented providing it's been demonstrated that there's no increase in risk.

- Also, please note that the Revitalised Flood Hydrograph Model (ReFH2) has not yet been formally evaluated and accepted by the Environment Agency.
- Finally, we would suggest noting that Appendix C is included for reference and doesn't form part of the guidance document. We have not reviewed this document as a formal part of the guidance and so it hasn't been accepted by the Environment Agency.
- We welcome the commitment to Green Infrastructure in 5.1.1 where it is stated that 'All structures must ensure high quality green corridors links for wildlife are maintained', to assist this aim we would recommend:
 - The consideration of biodiversity at the bridge design phase to try and ensure that where possible foundations structures are set back from the river channel to maintain a natural channel bank below the bridge.
 - Minimising the shading effect of the structures.

The Councils Response

- 5.18 The advice in relation to the updated climate change allowances is noted, and an assessment has been undertaken using the new allowances, which is reflected in the amended SPD. Further to this it states that flood compensation will be provided at the detailed design stage.
- 5.19 In reference to the small section of two stage channel, this will only be relevant for the channel in the immediate area of the bridge and not the channel upstream or downstream. The detailed design of the infrastructure item will demonstrate that this will not increase the flood risk elsewhere. Additional clarity has been provided in the SPD to reflect this.
- 5.20 In terms of the inclusion of Appendix C within the report, Appendix C seeks to outline the objectives of the Wilts and Berks Canal Trust and provide technical advice on how they can be achieved. The detailed design of the canal alignment, structure and design will be determined at the detailed design/application stage. In addition to this, the Wilts & Berks Canal Trust technical note was included as a reference to justify dimensions of the required bridge infrastructure.
- 5.21 In terms of the biodiversity considerations, these environmental factors should be addressed at the detailed design stage. The indicative typical cross section

for the watercourse crossings shown in para 4.2.5 include for a minimum 5 metre wildlife corridor in consideration of biodiversity requirements. A reference to consider the impact of shading has also been added to the SPD.

5.22 In summary, the main points submitted by **Historic England** related to the following:

- It may be beneficial to clarify the name of the Scheduled Monument (archaeology).

The Councils Response

5.23 The LPA agree that this amendment would provide further clarity to the SPD, and as a result the document has been updated to reflect this.

Comments from Parish Councils and other 3rd Parties

5.24 In summary, comments made by **Covingham Parish Council** related to the following:

- Covingham Flood Group would like to acknowledge and commends what Swindon Borough Council are aiming to achieve by producing such a detailed document. However, having looked at the heights given against each type of flood event and compared with historical data from Wanborough Road bridge, we believe the restricting of the flow at the bridges will increase the flood risk to properties in Covingham.

The Councils Response

5.25 The concerns are noted, and an assessment will be undertaken considering the new allowances and as a result, bridge sizes will increase where required. Further guidance is being sought from the EA in relation to the REFH2 flows and further details on the modelling inputs have been requested to ensure they match. This can be discussed in more detail directly with Covingham Flood Group to ensure the bridge sizes have been appropriately considered.

5.26 In summary, comments made by **Liddington Parish Council** related to the following:

- The Wilts and Berks Canal Technical Note is added on at the end of this document almost as an afterthought as if it was of peripheral interest to NEV. Given the critical role it can play in flood protection and providing material for the 'island' village development, it should be considered as the foundation of NEV.

The Councils Response

- 5.27 In reference to the Wilts and Berks Canal Technical Note, Atkins are providing an independent professional opinion as to whether the W&BCT proposals would provide effective flood mitigation for NEV. This report will outline the potential flood protection schemes which will be considered and delivered.
- 5.28 In summary, comments made by **Stratton St Margaret Parish Council** related to the following:
- It is a constant worry of all parishioners in the Parish that the NEV development will mean inevitable traffic congestion and its attendant potential for pollution.
 - The new bridge at the end of Covingham Way is/was going to be a “green” bridge for cyclists and then for service vehicles only. The Parish Council requires more clarification on its intended use. The continued erosion of first idea to second idea will lead to the new bridge being all traffic needs to be clarified. However any measures to mitigate the potential congestion in this area would be fully supported by the Parish Council.

The Councils Response

- 5.29 A programme of highway improvements has been identified to address highway capacity in advance of development. Greenbridge Roundabout improvement scheme was the first of these and is complete. The Council is working with its consultant Atkins to deliver the other required schemes (The A420 Gable Cross, A420/A419 White Hart Junction, Great Stall Bridge and Southern Connector Road) to ensure the impact of development is satisfactorily mitigated.
- 5.30 The Island Bridge Vision SPD provides guidance on the links between development villages within NEV. The Great Stall Bridge (Green Bridge) is therefore outside of the scope of this SPD document and will be assessed further at the detailed design stage. A separate public consultation programme will provide an opportunity to comment in detail on the Great Stall Bridge.
- 5.31 In summary, comments made by **Wanborough Parish Council** related to the following:
- There is no bridge shown over the canal, clearly there will need to be a bridge over the canal and an allowance needs to be made for this.
 - There is no bridge shown for the SCR over Wanborough Road, therefore how will the SCR cross over Wanborough Road? Will this mean there will be a junction and if so how will this impact on

Wanborough Road (a key non-coalescence corridor as stated with the GI)

- For a footpath and cycleway the width required as stated within the document should be 3.5m. Parish Council would like to see a consistent approach to all footpath and cycleways including those proposed along Wanborough Road.
- Parish Council raise concern on the funding and delivery of these bridges, it is important that all bridges are fully funded by the developer. Phasing of the developments is important to ensure the bridge between any two development islands is funded by the developer so that S106 money is received at the correct time.

The Councils Response

- 5.32 The Local Plan states that the route for the Wilts and Berks Canal must be safeguarded from development. Any necessary infrastructure required to facilitate the canal crossing existing infrastructure such as Wanborough Road would be delivered by W&BCT Canal application rather than as part of the NEV infrastructure.
- 5.33 The junction between the SCR and Wanborough Road is likely to be an at-grade junction with restricted movements. The geometry will be such that turning movements between SCR and Wanborough Road will be discouraged.
- 5.34 In reference to the widths of cycle paths, new cycle/footway infrastructure will be designed to achieve a desirable width of 3.5m wherever practicably possible. It should be noted however, that this will not necessarily extend to upgrading existing facilities within neighbouring villages such as Wanborough.
- 5.35 The intention of the SPD is to outline the necessary bridge infrastructure and costs required to deliver them, with the contributions required to deliver the bridges sought through S106 contributions. The timing for the bridges being delivered or the payment of the contribution towards the bridges will be agreed as part of the S106.
- 5.36 In summary, comments made by **Wilts & Berks Canal Trust** related to the following:
- The Bridge Vision proposes that the WBCT is responsible for the construction of one towpath culvert and two cycleway bridges. The canal through the NEV is proposed as a flood prevention and drainage measure integral to the developments in which case the associated structures should also be funded by the developers.

- Figure 1 also shows two road bridges passing over the canal (Ref 6a) and over the Liden Brook (Ref 6b) linking the proposed Lower Lotmead and Redlands developments. These bridges are to be constructed as part of the infrastructure development. It is intended that bridge Ref 6a is an in-situ box with a proposed clear span of approximately 7m, so as to allow for the future construction of the canal, whereas bridge Ref 6b is to have a clear span of 12m over the Liden Brook.
- The proposed road crosses the canal and Liden Brook at a skew of about 45° and therefore the clear span would need to reflect this. Furthermore WBCT have identified two other cross-drainage culverts, which are required to take the Liden Brook under the canal.
- It is noted that the alignment of the canal through the Lotmead development area follows the preferred WBCT alignment, however it is believed that the developer for the Lotmead developments has proposed a different alignment. The proposed cycleway bridges (Ref 16 and 17) could be constructed by the developers across the greenway corridor.
- Omitted from the list of bridges is the canal culvert under Wanborough Road (shown as Ref 20 on Figure 1) where the canal water level will be about 3.3 m below existing road level.

The Council's Response

- 5.37 The proposed canal would need to consider existing infrastructure as part of the detailed design. Any application for the canal would need to ensure the infrastructure would be retained or appropriate alternative mitigation is provided. In reference to the Wilts and Berks Canal Technical Note, Atkins are providing an independent professional opinion as to whether the W&BCT proposals would provide effective flood mitigation for NEV. This report will outline the potential flood protection schemes which will be considered and delivered.
- 5.38 The proposed 7 metre span in-situ box culvert for the canal is consistent with similar structures provided in Wichelstowe.
- 5.39 The road layout in the masterplan is indicative and the Council would look to optimise road alignments at bridge crossings to minimise skew angles and associated structure costs. Where road/canal high skew angles are unavoidable we would look to build the structure at 0° skew to minimise the span. The road would still cross at an angle and would result in a slightly wider although ultimately more economic structure.

- 5.40 Infrastructure required to allow the canal to cross Liden Brook would be delivered by a W&BCT Canal application rather than the NEV.
- 5.41 This SPD seeks to provide further detail and guidance over the quantum, design and location of the bridges which are identified as highway links between development islands within the Planning Obligations SPD. This suggestion is therefore considered to be outside of the remit of the SPD.
- 5.42 The proposed canal would need to consider existing infrastructure as part of the detailed design. Any application for the canal would need to ensure the infrastructure would be retained or appropriate alternative mitigation is provided. The detailed design would be assessed at the application stage.
- 5.43 Wanborough Road precedes the canal. Infrastructure required to allow the canal to cross Wanborough Road would be delivered by a W&BCT Canal application rather than the NEV.

6. Post consultation changes made to the NEV Island Bridge Vision SPD

- 6.1 As a result of the consultation exercise, a number of amendments were made to the draft FTP including:
- Amend paragraph 3.4.2 to be specific about the Scheduled Monument referred to.
 - Amend SPD to state that the guidance, particularly design would apply to all bridge infrastructure within the NEV.
 - Additional references to the PPG have been included, particularly in relation achieving a high standard of design.
 - Section 4 updated to incorporate the latest EA requirements including latest climate change allowances and further clarification has been provide to demonstrate how these will be addressed.
 - In line with the comments from the Environment Agency (EA), the 1 in 100 year flows plus 70% climate change allowance have been included in the document. Whilst this has not changed the widths of the structures, the soffit levels have been updated to represent the 1 in 1000 year levels to ensure they are a close representation to the 1 in 100 year levels plus 70% allowance for climate change. The cross section has also been updated to provide a general profile and requirements for all bridges.
 - The amendments to the flood levels has resulted in alterations to the heights of the bridge structures, and therefore further work is underway to provide accurate cost estimates. Any updated costs will be reflected

in an update to the NEV Infrastructure Delivery Plan (IDP), which forms part of the NEV Planning Obligations SPD.

This document is available on the internet at www.swindon.gov.uk.

It can be produced in a range of languages and formats (such as large print, Braille or other accessible formats) by contacting the Customer Services Department.

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