

June 2017 Planning Committee Report 1C - Statement of Consultation Appendix A - Summary of Comments and Officer Responses

Respondent Reference	Comment Number	Paragraph Reference	Table / Figure reference	Comment	Officer Response
1	001/1	Full Document	N/A	Broadly we are entirely content with the specification of the bridges being proposed. In particular we welcome the widths of the primary routes to be borne by the structures concerned. At 7.3m this will permit movement to be efficiently provided for, which is that much more important if quality commercial bus services are to be supported, owing to the extensive nature of the allocation, with development at low net and overall density, and large intervening areas of green infrastructure along flood plains. The widths of the secondary and village access bridges also is entirely sufficient to permit bus operations should they be required or appropriate along these links.	Noted. No changes proposed to SPD.
1	001/2	Full Document	N/A	Our major concern relates to phasing. These bridges will be essential to the realisation of attractive and effective bus routes, particularly into Lotmead and along the main E-W spine road through Great Stall. There is a discussion to be had, quite early, as to which bridges are more or less essential at an early stage, to provide both for general and construction traffic circulation (preventing localised temporary traffic build-ups during the construction phases around White Hart in particular); and also to provide for rational bus service penetration. Alignment of development phasing within each Village, including roads and access strategies to and within each of the parcels, and tied explicitly to planning conditions looks likely to be necessary to provide for the area south/west of Great Stall in particular to benefit meaningfully from public transport at a suitably early stage.	To be determined by Planning Application process. No changes proposed to SPD.
1	001/3	Full Document	N/A	Again, with regards to Lotmead in particular, while it may arguably be technically appropriate and feasible to deliver most of the are accessed from Wanborough Road, in reality delivering at least one link towards the north looks likely to be important for all the reasons outlined above. I recognise that the pending appeal creates a whole realm of uncertainty that, once resolved, will allow SBC to progress a strategy having regard to the Inspectorate's decision.	Noted.
2	002/1	N/A	Appendix C	I am a little puzzled at the reference in Appendix C to the WBCT Technical Note on Flooding as a heading but nothing else	Noted. Swindon Borough Council's adopted Local Plan has a policy to protect the alignment of a canal route through the NEV development. So as not to compromise delivery of the canal, the NEV development must provide a road bridge over there safeguarded canal at the Redlands development. The Wilts & Berks Canal Trust technical note was included as a reference to justify dimensions of this bridge which will assist with cost estimation.

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3	003/1	Section 5	N/A	We cannot see any bridge over the canal for the Wanborough road, is this a mistake?	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.
3	003/2	Section 5	N/A	We cannot see any bridge over the Wanborough road for the Southern Bypass, do we assume this junction will be a roundabout?	This will be an at-grade junction with restricted movements. The geometry will be such that turning movements between SCR and Wanborough Road severely prejudiced.
4	004/1	Canal Technical Appendix	N/A	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.	Swindon Borough Council's adopted Local Plan has a policy to safeguard the alignment of a canal route through the NEV development. So as not to compromise delivery of the canal, the NEV development must provide a road bridge over the safeguarded canal route at the Redlands development. The Wilts & Berks Canal Trust technical note was included as a reference to justify dimensions of this bridge which will assist with cost estimation.
4	004/2	Canal Technical Appendix	N/A	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.	Swindon Borough Council has appointed Atkins to provide an independent professional opinion as to whether the W&BCT proposals would provide effective flood mitigation for NEV. This report will further advise on the most appropriate form of flood mitigation.
4	004/3	Full Document	N/A	Yet I read that different developers will bid for work on individual villages. There needs to be co-ordination between the canal trust, and the building of the canal, and the developers led and regulated by the council for a successful organic creation of NEV.	Developers will not bid for work on individual villages. The NEV development is owned by multiple land owners. Various land owners and developers own options to develop separate sites which collectively comprise the NEV. A coordinated approach to the delivery of the NEV is expected.
5	005/1	5.2	N/A	Therefore where bridges are provided between main connections on the proposed development we would urge that as a minimum bridges are 6.75 metres carriageway width on the primary and secondary network. We are pleased that the proposals as set out comply with this and therefore we SUPPORT the highway widths as set out in section 5.2	Noted.
5	005/2	Full Document	N/A	Submission of position statement. Please see original response for more details.	Noted.
6	006/1	Full Document	N/A	Submission of position statement. Please see original response for more details.	Noted.
7	007/1	Full Document	N/A	The Island Bridge Vision is a good piece of work which meets a definite need; credit should go to you and your colleagues for identifying that need. We particularly welcome the inclusion of bridge 10, which will provide a very useful link from the new development to the footpath running south to Lower Earls court Farm and the bridleway to Bourton.	Noted.

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7	007/2	Section 5	Figure 5.1	We believe there is one omission. A link is needed across the canal between Lotmead and Redlands north-east of bridge 15 and south of bridge 3. We would like to see a pedestrian/cycle bridge added here.	<p>Although there is a proposed footpath along the canal towpath on the north side of the canal, no footpath currently is proposed close to the canal on the south side in this area. In addition there is already reasonable provision proposed for circular routes for the nearby residential properties along with reasonably convenient routes for those wishing to travel to the educational or employment facilities proposed through the NEV.</p> <p>Regular crossings of the canal to increase the possible routes for non-motorised users would be welcomed, however the crossings proposed are a reasonable compromise considering the costs of providing and maintaining the crossings in the future.</p>
8	008/01	Full Document	N/A	Many thanks for the opportunity to comment on the New Eastern Villages Island Bridge Vision Draft SPD. Please refer to the above link which outlines examples and best practice with respect to providing bridges for wildlife. I include this here because while I understand that the SPD concentrates on the physical infrastructure and bridge links between the villages, it should be acknowledged that wildlife also needs to be enabled to across areas of hard infrastructure. Such bridges help support connectivity between populations of species. Also if designed in a sympathetic way bridge structures can actually also provide habitat for certain species at critical times in their lifecycle, such as breeding or roosting opportunities for birds and bats for example.	Agreed. Add/enhance references to wildlife movement and include government link.
9	009/1	Full Document	N/A	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.	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. SBC is working with Consultant Atkins to deliver the remaining schemes of: A420 Gable Cross, A420/A419 White Hart Junction, Great Stall Bridge and Southern Connector Road.
9	009/2	Full Document	N/A	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 it's 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 Island Bridge Vision SPD is concerned with the links between development villages within NEV. The Great Stall Bridge (Green Bridge) is therefore outside of the scope of this SPD document. A separate public consultation programme will provide an opportunity to comment on the Great Stall bridge.

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10	010/1	Full Document	N/A	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.	Wanborough Road is existing infrastructure. Any necessary infrastructure required to facilitate the canal crossing Wanborough Road would be delivered by W&BCT Canal application rather than the implementation of NEV infrastructure.
10	010/2	Full Document	N/A	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)	This will be an at-grade junction with restricted movements. The geometry will be such that turning movements between SCR and Wanborough Road will be severely prejudiced.
10	010/3	Full Document	N/A	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.	New cycle/footway infrastructure will be designed to achieve a desirable width of 3.5m wherever practicable. This will not necessarily extend to upgrading existing facilities within neighbouring villages such as Wanborough.
10	010/4	Full Document	N/A	Parish Council raise concern on the funding and delivery of these bridges, it is important that all bridges are fully funded by the developer.	Noted. 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.
10	010/5	Full Document	N/A	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.	Noted. The intention of the SPD is to outline the necessary bridge infrastructure and the likely programme required to deliver them. The costs will be 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.
11	011/1	Full Document	N/A	There are no additional bridges identified that will affect my clients' land. There are no comments on the SPD other than the costs for the Bridge Vision set out in the SPD do not appear in the IDP or NEV Obligations SPD so this would appear to affect the viability of the overall development schemes placing additional financial burdens that should not be introduced by SPD.	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.
12	012/1			The first section of the draft SPD sets out that it aspires to provide "a cost beneficial crossing vision that meets highways demands and minimises impact on flood risk and the environment" as associated with the requirements of the New Eastern Villages allocation, identified through Policy NC3 of the adopted Local Plan. This ambition is broadly supported and the delivery of bridge infrastructure is clearly essential to ensure the connectivity of the New Eastern Villages allocation. However, the draft SPD would benefit from a short statement confirming explicitly that it applies only to land included within the New Eastern Villages allocation.	Noted. This SPD directly links with the relevant policies of the Local Plan and the NEV Planning Obligations SPD, it is therefore not considered necessary to add this statement.

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12	012/2			However, a number of concerns are raised in respect of the details of the draft SPD. For example, at paragraph 2.3.3, the draft document highlights that Local Plan Policy NC3 seeks to ensure that “the route for the Wilts and Berks canal as set out on the Policies Map will be safeguarded and protected from development”. However, the Local Plan Policies Map shows the canal alignment as being ‘indicative’. Similarly, Local Plan Policy EN11(a) states that “where the canal is affected by development, the alignment is protected or an alternative alignment is provided”.	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 from development.
12	012/3			Accordingly, the Local Plan does infer and recognise that a degree of flexibility is appropriate when considering the final alignment of the safeguarded routes. We would wish to see capacity for responsiveness this carried forward within the SPD. Indeed, as the alignment of both the canal route and the Southern Connector Road (SCR) is not fixed (as a result of the need to respond to emerging technical constraints), it is important that the SPD clearly articulates the need for flexibility, 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.	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.
12	012/4			With respect to the proposed bridge size requirements, no objection is raised in principle. However, 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. Specifically, our client would not wish any future crossing at Pack Hill (as associated with the SCR) to be defined as a Village Vehicular Access Way, as this would prejudice the scope for achieving their proposed development.	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.
12	012/5			In considering the draft SPD’s position regarding the canal, it is noted that the land take of the watercourse is identified as having increased, when compared to earlier documents. Similarly, the SPD highlights (at Appendix C) that a longitudinal relief drainage channel could be constructed alongside the canal instead of other flood mitigation measures such as low lift pumps. If this method is employed, then it would act to sterilise additional land, by increasing the width of the canal corridor, and may also increase the risk of flooding. This would present an additional obstacle for utilities, services, drainage, etc., to cross. Clearly, whilst the current Local Plan (and the associated New Eastern Villages allocation) makes provision for development until 2026, additional future development will invariably be required at the boundaries of the built extent of Swindon. Accordingly, the drainage strategy set out in the SPD should therefore avoid approaches which place more land at risk of flooding.	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.

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12	012/6			Regarding the proposed positioning of the lock gates (as indicated at Appendix C of the SPD), it is recommended that SPD allows for flexibility with respect to the siting of the locks. This will allow for optimisation of the need for earthworks (where the canal is to be set on an embankment or within a cutting), in order to reduce the land take. If the positioning of the locks can be adjusted such that the canal is close to existing ground levels, this is also likely to reduce costs associated with the Southern Connector Road (as the highway would not need to be raised onto an embankment to facilitate bridging points).	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.
12	012/7			Whilst our client's site, land at Inland Farm is outside of the Eastern Villages Allocation, it has the potential to support the delivery key pieces of infrastructure related to the strategic extension. This includes a section of the Southern Connector Road (SCR), land for the proposed Wilts & Berks Canal, and (potentially) assistance with strategic drainage management.	Noted.
12	012/8			In these respects, our client's proposals at Inland Farm have the potential to facilitate and enhance the delivery of infrastructure which is vital to the delivery of the New Eastern Villages allocation. These benefits are in addition to the hundreds of highly skilled jobs that the proposed advanced manufacturing facility will generate for the Borough.	Noted.
13	013/1			The Island Bridge Vision proposes that the WBCT is responsible for the construction of one towpath culvert and two cycleway bridges (References 15, 16 and 17 respectively). These are indicated on Figure 1 reproduced from the Island Bridge Vision document. 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.	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.
13	013/2			The towpath culvert (Ref 15) is not necessary. Although the alignment of the canal passes across low lying land at this location the drainage of this area is in a northerly direction towards the River Cole as indicated by the hydraulic model nodes shown on Figure 2. If the developer proposes to reduce the ground level along the left bank of the Liden Brook to provide flood compensation storage at this location, the canal would cross this reduced floodplain level on an embankment, thus forming a dam against flood flows from the Liden Brook and other watercourses from the southeast. To the northwest of the canal the local drainage route would be between the NEV developments (Lotmead and Lower Lotmead) towards the River Cole as per the current condition.	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.

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13	013/3			For both cycleway bridges (Ref 16 and 17) the clear span suggested by the Island Bridge Vision is 12m. However at both locations these bridges are on the downhill side of a lock structure on the canal. Thus the canal will be in excavation of about 1.5m below original ground level at these locations. The total width of the canal will therefore require a clear span of about 20m to accommodate the 3m and 5m wide berms as shown on Figure 3. The canal width could be reduced by the localised use of retaining walls or sheet piles but this would be an exception since it entails additional canal construction costs. The cycleway passing over the canal should have ramped paths each side of the canal to link to the towpath and provide access to the lock mechanisms.	These bridges were originally identified as needing to have spans in the order of 20m, however, have been incorrectly scheduled in the Vision. Indicative spans will be amended to 20m. These bridges will need to be delivered as part of future canal works.
13	013/4			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 7m span in-situ box culvert for the canal is consistent with similar structures provided in Wichelstowe.
13	013/5			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. As it is suspected that the developer for Lotmead intends to lower the floodplain in this area to provide flood compensation storage, the canal is likely to be on an embankment about 2m high. To allow for this, a bridge normal to the canal would need to have a clear span of about 20m to accommodate the 3m and 5m wide canal berms as shown on Figure 4. With a skew angle of 45°, this clear span would need to increase to about 30m since the canal is generally a straight line at this location and would not have sufficient space to meander through a narrower in-situ box opening. As mentioned above, the width of the canal could be reduced with the localised use of piled banks and single way working, but a narrow bridge would create a barrier to canal earthworks construction if built in advance.	The road layout in the masterplan is indicative and we 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. Bridge 6a crosses the canal at approx. canal chainage 4500 which is on the cut / fill interface and towards the end of the proposed flood defences. Our view is that these defences would simply link into the road embankment approaches to the bridge and provide the required defence continuity. As highlighted above in response to 013/4, the 7m span in-situ box culvert is consistent with those provided in the Wichelstowe development.
13	013/6			Furthermore WBCT have identified two other cross-drainage culverts, which are required to take the Liden Brook under the canal. These are given a new proposed designation; Ref 18 and 19 on Figure 1. The size of each cross drainage culvert is still to be determined and will depend on the hydrodynamic modelling of the Liden Brook.	Infrastructure required to allow the canal to cross Liden Brook would be delivered by a W&BCT Canal application rather than the NEV.
13	013/7			Cross drainage culvert Ref 18 would most likely need to pass the 1 in 1000 year flow and 1 in 100 year flow plus climate change in accordance with the Island Bridge Vision document so as not to cause flooding within the proposed Foxbridge development.	Infrastructure required to allow the canal to cross Liden Brook would be delivered by a W&BCT Canal application rather than the NEV.

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13	013/8			Cross drainage culvert Ref 19 can be designed to throttle storm flows so as to create an attenuation pond in farmland to the southeast thereby providing more capacity for the drainage of the NEV developments. This will have the effect of reducing the flooding potential within the NEV area as shown on Figure 5 and pictured in Figure 6.	Infrastructure required to allow the canal to cross Liden Brook would be delivered by a W&BCT Canal application rather than the NEV.
13	013/9			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 so as to facilitate the formation of a flood compensation storage area. This needs to be confirmed with the Lotmead developer so that the position of the bridges can be determined.	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 from development.
13	013/10			Regarding the formation of the canal, it would be prudent for the developers to prepare the earthworks required for the canal construction. It is argued that a more efficient excavation and filling earthworks balance can be achieved if developers were to use surplus suitable excavated material arising from their development to form the canal embankment at specific locations and likewise to form the excavation for the canal at other locations where the developer requires additional fill material. This can be carried out in conjunction with the WBCT so that locations of surpluses or shortages of material can be identified and the haulage of material can be minimised.	This SPD seeks to provide further detail and guidance over the quantum and design of 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.
13	013/11			In addition, while forming sections of the canal profile in the manner described above, the developers can meld the canal earthworks with a greenway corridor for walkers and cyclists compatible with SBC's draft supplementary planning document; NEV Green Infrastructure Strategy (February 2017). The greenway corridor would form the amenity footpath through the developments as shown on Figure 7 reproduced from Appendix A of the Island Bridge Vision. Early completion of the greenway corridor would then reduce disruption to residents caused by heavy earthworks.	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.
13	013/12			The proposed cycleway bridges (Ref 16 and 17) could likewise be constructed by the developers across the greenway corridor. A further advantage of this is that these bridges would then be built to the standards and architectural style which the developers apply to other bridges throughout their development. Bridges constructed by WBCT would be to canal standards.	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.
13	013/13			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.	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.

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14	014/01	3.4.2	N/A	It may be beneficial to set out at 3.4.2 what the Scheduled Monument (archaeology) is.	Agreed. Add further clarity to document. 3.4.2 "To the south west of Lotmead lies Durocornovium, a Scheduled Monument and the historic route of the Roman Road."
15	015/01	Section 1	N/A	<p>1.1 HHT welcome the opportunity to respond to this consultation. HHT has a major interest in the New Eastern Villages and are the applicants for a current outline planning application (S/OUT/13/1555), which would deliver both the South Marston and Rowborough Villages of the overall New Eastern Villages proposals.</p> <p>1.2 Paragraph 1.1.3 refers to the relationship between the draft SPD and the development to the north of the A240, that which is currently the subject of an application by HHT. The draft SPD states that "all new bridges are expected to be covered by a single planning applications and are therefore not included within this document". Furthermore, Figure 5.1: Indicative Link Locations, does not identify any bridge structures on land north of the A420.</p> <p>1.3 Paragraph 1.1.4 goes onto say "the Council recognises that responsibility for delivering southern links many have to rest with the Council. This Supplementary Planning Document therefore sets out to provision the vision for connectivity between the southern NEV development islands"</p> <p>1.4 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.</p>	The SPD seeks to provide guidance on the design of all bridges within the NEV. The Planning Obligations SPD outlines the required infrastructure for all development islands. The delivery of bridge infrastructure and level of contributions from each application will be assessed on their merits.
15	015/02	Full Document	N/A	1.5 HHT also conclude that given the focus of the draft SPD in that it relates solely to development south of the A420, that it is the Council's intention that HHT will not be required to contribute to costs associated with provision of the island bridges in the south, indeed, any such bridges to the north are implied to be a development cost associated with the development at South Marston and Rowborough and for which other parties will not be contributing.	Whilst the SPD sets out the framework for the delivery of bridges south of the A420, the SPD will still be a material consideration in reference to the application north of A420. The Planning Obligations SPD outlines the required infrastructure for all development islands. The delivery of bridge infrastructure and level of contributions from each application will be assessed on their merits. 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.

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15	015/03	Full Document	N/A	<p>1.6 Notwithstanding this clear intention, HHT wish to raise a number of issues and make a number of comments in relation to the document as currently drafted.</p> <p>1.7 In terms of the issues raised, HHT consider that:</p> <ul style="list-style-type: none"> • 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. 	<p>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 reasonable infrastructure request. 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.</p>
15	015/04	Appendix C	N/A	<p>1.8 HHT consider that the SPD, and its appendices, for instance Appendix C: Technical Note- Flood Protection of New Eastern Villages, as drafted is likely to impose unreasonable requirements in respect of island bridges and infrastructure associated with the policy aspiration for the provision of a canal. Such requirements, when considered cumulatively, add to the cost of delivering the development.</p>	<p>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. 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 reasonable infrastructure request.</p>

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15	015/05	Section 2	N/A	<p>National Planning Policy NPPF</p> <p>2.2 The references to national planning policy in section 2.2 of the SPD are generalised and paraphrased and not always seem relevant to the key objectives that the SPD seeks to support.</p> <p>2.3 For instance the reference that relates to paragraph 58 of the NPPF refers to good design in developments and as such, would not appear to be specifically related to the key objectives as set out in the SPD.</p> <p>2.4 Indeed, the NPPF policy that is of particular relevance to the SPD relates to the need for policies and in particular SPDs to not place substantial costs or burdens on development.</p> <p>2.5 Paragraph 153 of the NPPF is clear that SPDs “should not be used to add unnecessarily to the financial burdens on development”. Similarly, paragraph 173 of the NPPF states that: “Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened”.</p> <p>2.6 The SPD seeks to provide a “cost beneficial crossing vision”, and as such, recognition of the need to avoid financial burdens in the Draft SPD either informing the text of the SPD or in explaining the process by which development proposals are considered, should be articulated.</p>	<p>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 reasonable infrastructure request.</p>
15	015/06	Section 2	N/A	<p>National Planning Practice Guidance, March 2015</p> <p>2.7 Limited reference is made to PPG (paragraph 2.2.5 of the draft SPD), with emphasis on achieving good design; safe connected efficient streets are referenced, creation of vibrant communities and encouragement of ease of movement.</p> <p>2.8 Regard should be had to the guidance on flood risk and climate change, which has a bearing on the level of prescription and onerousness modelling criteria applied within the document (see comments in relation to Section 4: Bridge Size Requirements).</p>	<p>These sections of the document seek to provide a policy context for the SPD. Additional reference is made to the PPG, particularly in relation to achieving good design.</p>

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15	015/07	Section 2	N/A	<p>Swindon Local Plan</p> <p>2.9 The principal policy objectives of the Local Plan quoted are NC3: New Eastern Villages; DE1: High Design; TR1: Sustainable Transport Networks; TR2: Transport and Development; EN1: Green Infrastructure; EN6: Flood Risk; EN11: Heritage Transport; and IN1: Infrastructure Provision</p> <p>2.10 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.</p> <p>2.11 Policy EN11 relates specifically to Wilts & Berks Canal and North Wilts Canal, considered to be "a discreet policy designed to safeguard the remaining non-developed route of the Wiltshire SBC NEV Island Bridge Vision Representations by Hannick Homes, Hallam Land Management and Taylor Wimpey David Lock Associates and Brookbanks Consulting Ltd 3 April 2017</p> <p>3</p> <p>& Berkshire Canal through Swindon Borough and connect to the network beyond the Borough boundary". Again, this canal specific policy doesn't identify a mitigation function.</p> <p>2.12 The SPD and its appendices (particularly appendix C) appear to elevate the function and importance of the Canal as a flood mitigation measure for the development of the NEV.. The Local Plan presents a policy aspiration of the reinstatement of the Canal as a historic feature, with associated amenity and biodiversity benefits. Its role as a strategic flood protection measure is</p>	<p>Policy NC3 seeks to ensure the "form of the development shall comprise a series of new inter-connected distinct villages...". Due to existing constraints, bridges are required to form the links between these villages.</p> <p>Policy NC3 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 outline 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.</p>

Respondent Reference	Comment Number	Paragraph Reference	Table / Figure reference	Comment	Officer Response
15	015/08	Section 2	N/A	<p>Conclusions on Compliance with Policy</p> <p>2.14 HHT consider that the Draft SPD is not consistent with the existing policy context.</p> <p>2.15 As is demonstrated above the Draft SPD is generalised in its references to national policy and guidance and omits national guidance as to what can reasonably be expected, such that the references, do not necessarily accord with the stated objectives of the SPD.</p> <p>2.16 The caveats in the PPG in terms of costs of infrastructure should be acknowledged in the SPD, and described as factors in determining the design of structures.</p> <p>2.17 The Draft SPD moves beyond the context provided in the Local Plan and attempts to set out an inflexible approach that is not justified. This is for instance the case in terms of the level of prescription that is pursued through design requirements and testing of structures, both at design and construction stages. Matters that will involve substantial additional cost over and above that which can be considered to be reasonable.</p> <p>2.18 The SPD appears to prescribe design solutions in isolation – which are reported to offer “cost benefits”, without alternatives through which to make an informed comparison.</p> <p>2.19 The SPD should instead set out the national policy context fully, the technical standards to be adopted and the approach to assessing reasonable practicality and economic proportionality as part of the design process. This would ensure appropriate recognition of the specifics of each development and its site context.</p> <p>2.20 A significant concern is the weight given in the SPD to the canal as the backbone of a wider NEV SUDS strategy and which is not evidenced nor supported in policy terms. . Alternative forms of flood mitigation are capable of delivering the benefits sought</p>	<p>Policy NC3 seeks to ensure the "form of the development shall comprise a series of new inter-connected distinct villages...". Due to existing constraints, bridges are required to form the links between these villages.</p> <p>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.</p> <p>Policy NC3 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 to enforce the use of the canal as flood mitigation, but outline 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.</p>

Respondent Reference	Comment Number	Paragraph Reference	Table / Figure reference	Comment	Officer Response
15	015/09	Full Document	N/A	<p>3 Scope of SPD</p> <p>3.1 The Draft DPD exceeds the scope that is considered appropriate in a Supplementary Planning Document..</p> <p>3.2 A NEV Island Bridge SPD does not appear to be suggested or considered necessary in the Swindon Local Plan nor in the latest Local Development Scheme.</p> <p>3.3 The SPD suggests at paragraph 1.1.5 that the document provides “a cost beneficial crossing vision that meets highways demands and minimises impact on flood risk and the environment”.</p> <p>3.4 The draft SPD is not supported by evidence to demonstrate that this Vision is cost beneficial, nor does it assess cost benefits by implementing this Vision as opposed to an alternative approach.</p> <p>3.5 The second element is that it “meets highways demands”. Whilst an indicative road network is illustrated in in the NEV Masterplan, it is acknowledged that the masterplan will evolve as detailed schemes progress. It is therefore presumptive to suggest that the draft SPD’s approach meets highways demands or can be definitive. this is broad Testing and change against evolving development proposals and information will need to be allowed for. –</p> <p>3.6 Similar flexibility will be required to test how and whether proposals minimises impact on flood risk and the environment as information and master planning and modelling progresses.</p> <p>3.7 HHT consider that:</p> <ul style="list-style-type: none"> • 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 	<p>Primarily due to requirement to update the flood levels and therefore the bridge sizes, further work is underway to provide accurate cost estimates. 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.</p> <p>Disagree. The SPD provides 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.</p> <p>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.</p>
15	015/10	Section 4	N/A	<p>Section 4 Minimum Bridge Size Requirements</p> <p>3.12 Paragraph 4.1.2 sets out principles that will be required through detailed design but seek at this stage to prescribe minimum requirements of the bridge structures for the six road crossing points identified in the SPD, part of the design criteria refers to the following specific elements, for which we provide comment on</p> <ul style="list-style-type: none"> • “ a minimum 5 metre shelf to provide biodiversity enhancements”. <p>3.13 This is overly prescriptive, and lacking in evidence that support the need for provision of a wide shelf for biodiversity purposes. The SPD goes onto say that full ecological surveys should be conducted, and indeed, any such mitigation can then form part of the detailed design, as appropriate. It should not be applied as a minimum prescription.</p> <p>The “requirement” for a 5m shelf should therefore be deleted.</p>	<p>A minimum shelf of 5m is to ensure there is a sufficient flow rate and that biodiversity opportunities are enhanced. A reduced minimum shelf size would result in the need to increase the size of the bridge to accommodate an appropriate flow. The shelf also results in net biodiversity benefits.</p>

Respondent Reference	Comment Number	Paragraph Reference	Table / Figure reference	Comment	Officer Response
15	015/11	Section 4	N/A	<p>“The Hydraulic capacity of the proposed structure so it is at least consistent with the existing watercourse and able to accept a 1 in 100 year flood flows plus an assessment for climate change (an additional 20%).”</p> <p>3.14 Whilst such an approach might be justified when the flow is demonstrated to be within bank or just within bank, acknowledging the variation in climate change figures and implications for changes to detailed modelling, may reveal different flood extents. It therefore cannot be guaranteed that such an approach is achievable in all instances. In which case, alternatives should be considered, such as the use of flow channels around the bridge which could offer a more appropriate solution that provides the same level of protection in a flood event.</p> <p>3.15 Whilst compliance with the 1 in 100 year flood flows (plus 20%) might be desirable and indeed achievable at some locations, flexibility should be applied to support alternative measures to achieve appropriate flood protection measures. Suggest additional wording “Where this is demonstrated not to be achievable, alternative approaches will be considered”</p>	This will be resolved at the detailed design stage in consultation with the EA and LLFA.
15	015/12	Section 4	N/A	<p>“Bridges will also be designed to pass the 1 in 1000 year event”</p> <p>3.16 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.</p> <p>3.17 This “requirement” should be deleted.</p>	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.
15	015/13	Section 4	N/A	<p>Afflux backwater effect should be kept to a minimum and in all cases must not exceed 75 mm.”</p> <p>3.18 This requirement is onerous and should not be applied as a blanket prescription. It should only be considered appropriate near points of sensitivity (adjacent to built development). In locations that are designed as part of a comprehensive site masterplan, to provide capacity to deal with flood events, such as within green corridors, such a requirement cannot be justified.</p> <p>3.19 The text should be amended as follows “Afflux backwater effect should be kept to a minimum and in all cases and sensitive locations such as those adjacent to areas of built development, must should not exceed 75 mm, unless demonstrated that a higher tolerance is acceptable”.</p>	This is a requirement from the EA. Further guidance has been received from the EA and the Bridge Vision will be updated to meet the latest EA requirements.

Respondent Reference	Comment Number	Paragraph Reference	Table / Figure reference	Comment	Officer Response
15	015/14	Section 4	N/A	<p>“All bridge crossings are clear span in design with abutments set outside the 1 in 100 year plus climate change allowance extent.”</p> <p>3.20 To direct bridge abutments to be set outside the 1 in 100 year plus climate change allowance is particularly onerous, more so as extents of climate change are not specified within the document nor Local Plan evidence base. The bridge plan provided within the draft SPD does not conform to this design aspiration.</p> <p>3.21 This requirement should be deleted.</p>	This is a requirement from the EA. Further guidance has been received from the EA and the Bridge Vision will be updated to meet the latest EA requirements. The 5m shelf has been provided to accommodate these flows and minimise the width requirements of the structure.
15	015/15	Section 5	N/A	<p>3.22 Section 5.1 provides a list of key principles that comprise the Bridge Vision, within which a number of the flood risk requirements referred to in section 4 are repeated. We have already provided comment under Section 4, and so those comments are not repeated here but for the avoidance of doubt, also apply to section 5.1.</p>	Noted.
15	015/16	Section 5	N/A	<p>3.24 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).</p>	Noted.
15	015/17	Section 5	N/A	<p>3.25 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 paras 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,</p>	The proposed cross-sections and route hierarchy 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 DMRB, MfS, 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. 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.

Respondent Reference	Comment Number	Paragraph Reference	Table / Figure reference	Comment	Officer Response
15	015/18	Section 5	N/A	<p>3.26 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.</p> <p>3.27 A flexible approach that reflects site-specific contexts and a range of development partners is not only critical to the implementation of the wider NEV but also is consistent with the prescribed approach articulated in the Local Plan which refers to indicative development islands that will be adjusted and refined through a detailed masterplanning process as part of the evolution of development proposals. "The extent of the development islands is also illustrated but will be refined through the development management process" (Paragraph 5.89 of the explanatory text NC3).</p> <p>3.28 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.</p>	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.
15	015/19	Section 5	N/A	<p>3.29 Paragraph 5.3.3 refers to funding costs for the bridges. Stating that four of the six fall outside of planning application boundaries, and as such "may" be delivered by the Council with "funding secured through Section 106 agreements". The SPD is not prescriptive in terms of how the other two bridges are delivered.</p>	Agreed. Clarify how it is envisaged that the other 2 bridges will be delivered. i.e. by developer.
15	015/20	Section 6	N/A	<p>Section 6 Technical Approval and Adoption Process</p> <p>3.30 Paragraph 6.1 states that the NEV links between development islands will be constructed to adoptable standards. The guidance for the adoption process is provided at Appendix B of the draft SPD, and is drawn from "Draft Transport Requirements for Development (TRFD)". This guidance itself is still subject to consultation and adoption and therefore it is inappropriate in its current form to be used as guidance to support any such technical approval and adoption process in respect of the island bridges.</p> <p>3.31 Furthermore, the draft SPD does not implicitly state that the Council will adopt these structures. Clarity should be provided in respect of the future maintenance and management of the bridges.</p>	Although the draft Trfd guidance is currently in consultation, the general principles it outlines for the Technical approval and adoption of highway structures are based on National guidance and best practice. Irrespective of acceptance of the TRFD, SBC will continue to use Nationally recognised process for TA and adoption of highway structure. SBC requires structures supporting the highway to be adopted. Structures supporting non-highway areas will not automatically be adopted by the Authority and will need to be determined on a case by case basis. The Authority may be prepared to take on these structures with appropriate commuted sum payment.

Respondent Reference	Comment Number	Paragraph Reference	Table / Figure reference	Comment	Officer Response
15	015/21	Section 7	N/A	<p>Section 7 Cost Estimates</p> <p>3.32 The Draft SPD requires design proposals for all new bridges within the NEV development to be justified by a whole life costing, and where this is not demonstrated, commuted sums will be required to cover any future maintenance and replacement costs. –</p> <p>3.33 Paragraph 7.2.3 sets out “assumed cost estimates” for each of the primary, secondary and access structures, which cumulatively total £5,900,000. In addition the SPD identifies a “25% optimum bias” that increases these costs to some £7.3m.</p> <p>3.34 Paragraph 7.3.3 provides cost estimates for the pedestrian/ cycle bridge structures, and assumes a total cost of £1.06m (including a 25% optimism bias). It is noted that these sums are significantly greater than those referred to in the NEV Planning Obligations SPD for this infrastructure.</p> <p>3.35 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.</p>	<p>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 work is 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.</p>

Respondent Reference	Comment Number	Paragraph Reference	Table / Figure reference	Comment	Officer Response
15	015/22	Appendix C	N/A	<p>Appendix C: Technical Note, Flood Protection of New Eastern Villages</p> <p>3.36 Appendix C seeks to raise the function of the Canal from a policy aspiration that delivers a historic; amenity and biodiversity resource to an infrastructure feature that underpins a NEV-wide SUDS strategy.</p> <p>3.37 Notwithstanding the lack of supporting technical evidence for this, it assumes that the canal is constructed and fully operational before development commences. However, it is HHT understanding the conversely, it is the canal would be imposed following successive phases of development. This approach is supported in the wording of NC3 which refers to “safeguarding” of the canal alignment, which infers that development will lead.</p> <p>3.38 There is no evidence that the canal will form a fundamental part of the development of the NEV as a whole, however para 1.1.6 of Appendix C states that the canal is to provide flood control measures to “counteract the increased fluvial flood risk resulting from the proposed development”. There is no reference in the Local Plan, nor its evidence base that supports the canal performing a flood mitigation role. Indeed, each development proposal is required to deal with flood mitigation as an embedded part of schemes, and there is no reliance on any such mitigation through a NEV-wide solution.</p> <p>3.39 However the document does not identify a timescale for the implementation of the canal, nor the funding streams that would secure its delivery in parallel with the delivery of the development islands by the respective developer consortiums.</p> <p>3.40 Paragraph 5.90 of the Local Plan refers to the potential phasing of the NEV and states “whilst it is anticipated development will progress broadly in a north to south direction supporting delivery of key infrastructure and achieving the critical mass around the district centre and the express bus corridor, it is recognised that there will be opportunities for development to</p>	<p>Policy NC3 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 to enforce the use of the canal as flood mitigation, but outline 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.</p>
16	016/01	Full Document	N/A	<p>Submission of position statement. Please see original response for more details.</p>	<p>Noted. The provision of links between the villages will encourage residents to use sustainable modes of transport, increasing the opportunities for a active and healthy lifestyle, in accordance with Policy CM2 of the Local Plan.</p>

Respondent Reference	Comment Number	Paragraph Reference	Table / Figure reference	Comment	Officer Response
17	017/01	Section 4	N/A	<p>Climate Change Allowances</p> <p>The climate change allowances were revised over a year ago and so the new allowances should be used within this assessment. We previously asked for abutments to lie outside of the 1 in 100 year plus climate change extent (20% at the time), however this lead 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.</p> <p>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.</p> <p>Following on from this, please note, as part of the planning process we would expect to see a more detailed assessment demonstrating the following:</p> <ul style="list-style-type: none"> - 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. 	Noted. Assessment to be made with the new allowances. The section currently states that flood compensation will be provided within the detailed design.
17	017/02	Section 4	N/A	<p>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.</p> <p>Also, please note that the Revitalised Flood Hydrograph Model (ReFH2) has not yet been formally evaluated and accepted by the Environment Agency.</p>	This is only for the channel in the immediate area of the bridge and not the channel upstream or downstream, however the detailed design will demonstrate that this will not increase the flood risk elsewhere.
17	017/03	Appendix C	N/A	<p>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.</p>	Include explanation for inclusion of Appendices in para 1.2

Respondent Reference	Comment Number	Paragraph Reference	Table / Figure reference	Comment	Officer Response
17	017/04	Section 5	N/A	<p>Biodiversity</p> <p>We welcome the commitment to Green Infrastructure in 5.1.1 where it is stated that</p> <p>All structures must ensure high quality green corridors links for wildlife are maintained, to assist this aim we would recommend:</p> <p>☑ 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</p> <p>☑ Minimising the shading effect of the structures.</p>	State SBC expect these environmental factors to be routinely addressed at detailed design stage. The indicative typical cross section for the watercourse crossings shown in 4.2.5 include for a minimum 5m wildlife corridor in consideration of biodiversity requirements.
18	018/01	Full Document	N/A	<p>Whilst we have no particular comment at this stage, we would observe that 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. We would be grateful if these comments could be taken on board and look forward to participating in the next stage of the document.</p>	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 work has been done on the potential costs, additional work is proposed to ensure the costs are accurate and reflect the required detailed design for the proposed bridge structures.
19	019/01	Section 4	N/A	<p>Covingham Flood Group would like to acknowledge and commends what Swindon Borough Council are aiming to achieve by producing such a detailed document. However, we would like the following comment to be noted.</p> <p>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</p>	A revised assessment has resulted in new allowances and bridge sizes being required. Further clarification is being sought from the EA with respect to the REFH2 flows and modelling inputs. More information will be provided to ensure the proposed bridges will be adequately sized and further detail on this will be provided in due course.
20	020/01	Appendix C	N/A	<p>The Canal Trust detail designs, as shown in their document (Appendix C) Flood Protection of the New Eastern Villages which is incorporated into SBC New Eastern Villages Draft Illustrative Master Plan, does not go far enough to help prevent flooding especially around Lower Earls court Farm area. Please see area indicated on drawing 00. We, the Wanborough Anti-Flood Group suggest that the canal is re-routed south of Lower Earls court farm house then to travel north which avoids the canal creating a dam in this well documented flood area.</p> <p>In May 2015, this was pointed out to the canal trust engineering committee by the Wanborough Anti-Flood technical adviser, Adye Goodenough.</p>	Swindon Borough Council's adopted Local Plan has a policy to safeguard the alignment of a canal route through the NEV development. So as not to compromise delivery of the canal, the NEV development must provide a road bridge over the safeguarded canal at the Redlands development. The Wilts & Berks Canal Trust technical note was included as a reference to justify dimensions of this bridge.

Respondent Reference	Comment Number	Paragraph Reference	Table / Figure reference	Comment	Officer Response
20	020/02	Appendix C	N/A	Even though the Canal Trust has been granted protective status for their proposed canal route it should NOT be taken that they are the only people who should be responsible for flood protection of the NEV.	Swindon Borough Council's adopted Local Plan has a policy to safeguard the alignment of a canal route through the NEV development. So as not to compromise delivery of the canal, the NEV development must provide a road bridge over the safeguarded canal at the Redlands development. The Wilts & Berks Canal Trust technical note was included as a reference to justify dimensions of this bridge.
20	020/03	Appendix C	N/A	Richard Bennett and Tim Price have both indicated to us that they would like to use the protected route of the canal for Anti-flooding purposes. However contrary to this wish to use the canal for this purpose, the true levels as shown on the drawings, point to the Suds flowing in the opposite direction i.e. going North of the canal and does not have extra height in the free board to pipe the water into the canal above the expected water levels of the canal	Swindon Borough Council's adopted Local Plan has a policy to safeguard the alignment of a canal route through the NEV development. So as not to compromise delivery of the canal, the NEV development must provide a road bridge over the safeguarded canal at the Redlands development. The Wilts & Berks Canal Trust technical note was included as a reference to justify dimensions of this bridge.
20	020/04	Appendix C	N/A	Please look at the satellite level information. The Lidar is not accurate enough to be used on such a low level flat terrain. All the level information provide on the drawings are taken from public published planning application documents. We have noticed that the firm PBA have produced satellite levels for most of the developers in this area and the true satellite data information should be at hand in your office, for the whole of the NEV.	Swindon Borough Council's adopted Local Plan has a policy to safeguard the alignment of a canal route through the NEV development. So as not to compromise delivery of the canal, the NEV development must provide a road bridge over the safeguarded canal at the Redlands development. The Wilts & Berks Canal Trust technical note was included as a reference to justify dimensions of this bridge.
20	020/05	Appendix C	N/A	Acorn bridge. We are curious to find the reaction of the Environment Agency to the plans for the Canal Trust to dump Suds into their streams as attenuation ponds. If you look at the enclosed photograph, you will see that most of the flood water is between the farm track entrance from the A420 and the "new" location of the canal culvert at Network Rail near Acorn Bridge. If the ground in this location, acted as an attenuation pond, however the water would need to be pumped up into the canal, due to the level differences. (see drawing 01) The canal, in its protected position as shown on your master plan, could cause a major flood dam when the water comes down from the hills along the Lenta brook, as this area has a lower ground level. This area is only practical location that the SUDs can feed into the canal. (see drawing 02)	Swindon Borough Council's adopted Local Plan has a policy to safeguard the alignment of a canal route through the NEV development. So as not to compromise delivery of the canal, the NEV development must provide a road bridge over the safeguarded canal at the Redlands development. The Wilts & Berks Canal Trust technical note was included as a reference to justify dimensions of this bridge.

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20	020/06	Appendix C	N/A	<p>Please do not assume that information is correct, when the true data is available in the public domain. Please see drawing no 03 for more details on the existing true water levels for this bridge No 6A, however this information should be confirmed by the canal trust.</p> <p>5.9 Lower Lotmead to Redlands bridge No 6A 5.9.1 This highway link crosses on watercourse and the protected canal alignment. As such the bridge details for each structure are given separately.</p> <p>5.9.2 The canal bridge would be constructed with a short section of puddled earthworks. This would mitigate the risk of disturbance to the bridge structure when the canal is constructed.</p> <p>5.9.3 The location of the canal crossing is within a proposed cutting section of the canal (W&BCT Technical note, Flood Protection of New Eastern Villages, Appendix C). For the purpose of this consultation and as a conservative assumption, the canal water level is assumed to be level with the existing ground.</p>	Swindon Borough Council's adopted Local Plan has a policy to safeguard the alignment of a canal route through the NEV development. So as not to compromise delivery of the canal, the NEV development must provide a road bridge over the safeguarded canal at the Redlands development. The Wilts & Berks Canal Trust technical note was included as a reference to justify dimensions of this bridge.
20	020/07	Appendix C	N/A	The appendix 2) produced by Richard Sewerniak, is not signed off by the chief engineer Eddie Thomas.	Swindon Borough Council's adopted Local Plan has a policy to safeguard the alignment of a canal route through the NEV development. So as not to compromise delivery of the canal, the NEV development must provide a road bridge over the safeguarded canal at the Redlands development. The Wilts & Berks Canal Trust technical note was included as a reference to justify dimensions of this bridge.
20	020/08	Appendix C	N/A	Please look at drawing 04, which shows the level of SUDs at Lotmeads being lower than the canal and the Redlands site. There is a possibility of the canal banks creating another dam and therefore causing flooding.	Swindon Borough Council's adopted Local Plan has a policy to safeguard the alignment of a canal route through the NEV development. So as not to compromise delivery of the canal, the NEV development must provide a road bridge over the safeguarded canal at the Redlands development. The Wilts & Berks Canal Trust technical note was included as a reference to justify dimensions of this bridge.
20	020/09	Appendix C	N/A	We also notice that there are no bridges or any accommodation for any animals to cross the roads and canal, as in horses, horse friendly gates, dogs, deer, foxes, otters etc, neither is there any provisions for wildlife to exit the canal, i.e. duck ladders, ramps and slopes.	Swindon Borough Council's adopted Local Plan has a policy to safeguard the alignment of a canal route through the NEV development. So as not to compromise delivery of the canal, the NEV development must provide a road bridge over the safeguarded canal at the Redlands development. The Wilts & Berks Canal Trust technical note was included as a reference to justify dimensions of this bridge.
20	020/10	Appendix C	N/A	We notice in the document Appendix C that the attenuation pond No 4 is sighted at Foxbridge Farm which floods regularly and it seems that Swindon Borough Council and the canal trust are unaware that there is a new house between the farm house and the river Liden. The council insisted that a flood model was produced for this property and this will also prove that the attenuation pond is not viable or desirable in this location.	Swindon Borough Council's adopted Local Plan has a policy to safeguard the alignment of a canal route through the NEV development. So as not to compromise delivery of the canal, the NEV development must provide a road bridge over the safeguarded canal at the Redlands development. The Wilts & Berks Canal Trust technical note was included as a reference to justify dimensions of this bridge.

Respondent Reference	Comment Number	Paragraph Reference	Table / Figure reference	Comment	Officer Response
20	020/11	Appendix C	N/A	The Canal Trust is already aware of the incredible archaeological importance of this area which must be respected. This included sites and finds that have not been written up as yet.	Swindon Borough Council's adopted Local Plan has a policy to safeguard the alignment of a canal route through the NEV development. So as not to compromise delivery of the canal, the NEV development must provide a road bridge over the safeguarded canal at the Redlands development. The Wilts & Berks Canal Trust technical note was included as a reference to justify dimensions of this bridge.
20	020/12	Appendix C	N/A	In Conclusion we feel that there has not been enough joined up thinking between SBC Planning Officers, the Developers and The Wilts and Berks Canal Trust.	Swindon Borough Council's adopted Local Plan has a policy to safeguard the alignment of a canal route through the NEV development. So as not to compromise delivery of the canal, the NEV development must provide a road bridge over the safeguarded canal at the Redlands development. The Wilts & Berks Canal Trust technical note was included as a reference to justify dimensions of this bridge.