

Swindon - New Eastern Villages
Green Infrastructure
Supplementary Planning Document

Statement of Consultation

July 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 New Eastern Villages (NEV) draft Green Infrastructure Supplementary Planning Document (SPD). The SPD comprises one document providing a robust framework for securing the delivery of Green Infrastructure generated by development schemes in the NEV.

2. Purpose

- 2.1 The SPD sets out Swindon Borough Council's (SBC's) robust framework for securing the delivery of GI generated by development schemes in the NEV. It sets out in detail the Council's approach to the provision of GI related to development at the NEV, providing further detail to the principles established by Policy NC3, in particular to provide:

“an extensive green infrastructure network that maximises opportunities for habitat connectivity and enhanced biodiversity including extending the River Cole green infrastructure corridor and connecting with Nightingale Wood”

- 2.2 This document sets out the strengths and opportunities for GI that can be realised at the NEV, providing options to facilitate the delivery of an integrated, multi-functional, GI network throughout the NEV. It has the potential to deliver over 300 hectares of GI providing an integrated GI network across the site. The strategy will seek to fulfil the full range of open space provision required, responding positively to the landscape and the topography of the area whilst maximising opportunities for the new communities. GI will be delivered in a creative, innovative, and sustainable way which is engaging, promoting enjoyment and well-being for all, in the context of the development requirements and partnership working. The provision of Green Infrastructure is necessary to create a sustainable development as required by the National Planning Policy Framework (NPPF).

3. When did consultation take place?

- 3.1 Public consultation on the draft SPD took place between 20th February 2017 and 3rd April 2017. A total of 28 responses were received; generating over 270 comments.

4. Who was consulted?

- 4.1 In accord with the Town and Country Planning (Local Planning) (England) Regulations 2012 and other relevant statutory provisions, 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 All comments have been logged on a 'record of interested parties', and have been responded to by relevant Officers. The following paragraphs provide a summary of the comments and due to the high number of responses, it is not possible to detail all of them within this Statement of Consultation. A summary table of detailed comments and Officer Responses are available online.

Stakeholder responses

- 5.2 Comments were received from stakeholders including:
- Bishopstone Parish Council
 - Bluestone Planning
 - Councillor Gary Sumner (Ridgeway Ward)
 - Environment Agency (EA)
 - GWH Foundation Trust, Swindon CCG, Public Health (SBC)
 - David Lock Associates (on behalf of Hallam Land Management Ltd, Hannick Homes & Developments Ltd. and Taylor Wimpey UK Ltd.)
 - Harris Lamb Property Consultancy (on behalf of Barberry (Swindon) Ltd)
 - Haydon Wick Parish Council
 - Historic England (HE)
 - Jackson Planning Ltd (on behalf of The Blatchford Family)
 - Liddington Parish Council
 - Natural England (NE)

- Public Health (SBC)
- South Marston Parish Council
- Sport England (SE)
- Stratton St Margaret Parish Council
- Thames Water Ltd
- The Canal and River Trust
- Turleys (on behalf of Ainscough Strategic Land Ltd)
- Turleys (on behalf of Wasdell Commercial Properties)
- Wanborough Flood Group
- Wanborough Parish Council
- Wilts & Berks Canal Trust
- Wiltshire Council
- Wiltshire Swindon & Oxfordshire Canal Partnership
- Wiltshire Wildlife Trust (WWT)
- Woodlands Trust (WT)

5.3 A number of key themes and issues are highlighted in the consultation responses, as well as more specific comments relating to Green Infrastructure:

- There were a significant number of supporting comments to the draft GI SPD including the Canal & River Trust, Historic England, Wiltshire Wildlife Trust, the Woodland Trust and Sport England;
- Several of the responses highlighted the difficult balance with competing land interests delivering GI at the NEV;
- Need for more clarity on definitions of land uses and designations;
- Concern raised in relation to the provision of the sports hubs in the flood plain and the need for facilities, for example, the visitor centre;
- More consideration is required in relation to flood risk mitigation;

- Concern raised in relation to delivery of the objectives within the plan and lack of detail to ensure effective use of green infrastructure;
- The need to link the vision to health and wellbeing objectives;
- There were comments regarding detailed matters, such as softening of the Southern Connector Road, development screening the design and location of skate parks;
- Other comments relate to the lack of detail shown on the GI maps within the SPD. The maps are too generic and not consistent with the Masterplan, and other strategies; the inclusion of the neighbourhood plan map within the GI SPD.
- The lack of reference to the indicative Wilts & Berks canal route.

The Council's Response

- 5.4 The Council acknowledges the supporting comments, in particular the positive intention to deliver a comprehensive network across the NEV. Key stakeholder engagement will be ongoing and is an important part of developing appropriate guidance on the identification of the GI required to support the NEV and in terms of effective delivery and implementation.
- 5.5 The Council consider that the SPD should not be read in isolation and there are a number of SPDs that have been recently prepared to support policy and provide further guidance to development at the NEV, namely the adopted Sustainable Drainage Systems (SuDS) Vision for New Eastern Villages (NEV) SPD (adopted February 2017)
- 5.6 The maps detailed in the draft SPD required attention with regards to their presentation and clarity. Many comments were made in relation to this, thus all the maps have been reviewed to improve the following:
- Consistency – Illustrative maps have now been prepared on a consistent basis including the annotation of existing and proposed GI
 - Clarity - The application of GIS has now improved the presentation of each illustrative map and they are now much easier to read and interpret,
 - To address comments, where appropriate to do so

Comments from Environmental Stakeholders

5.7 In summary, comments made by **The Environment Agency (EA)** relate to:

- The EA were pleased to see that the document recognises the importance of the River aspects of GI, including promoting wildlife corridors along the River Cole;
- The EA welcome the proposals in paragraph 3.2.7 to restore floodplain meadows, this will not only result in an increase in biodiversity but could also cause a reduction in flood risk;
- The EA would also support improvement of aquatic life through removal of barriers and sensitive bankside management as set out in 3.2.7;
- As relates to key principle 2 in the document, it is recommended that there are more specific requirements contained in the SPD that all developments within 8 metres of designated Main Rivers provides a buffer zone free from built development including lighting, domestic gardens and formal landscaping.

The Council's response

5.8 The Council welcome the supporting comments from the Environment Agency. The Council will continue to engage with the Environment Agency on planning related matters at the NEV, including the provision of green infrastructure.

5.9 The Council acknowledge the point made with regards to ensuring that all developments within 8 metres of designated Main Rivers provide an appropriate buffer zone free from built development. On this basis, additional text has been included as part of 'Key Principle 2'. Such buffers form a vital part of GI provision, in accord with paragraph 109 of the National Planning Policy Framework (NPPF).

5.10 In summary, comments made from **Natural England (NE)** relate to:

- NE welcome the emphasis on grazing as a management regime. To the benefits listed in 3.6.3 we would add that biodiversity benefits significantly from grazing (especially cattle) rather than mechanical management. The type of grazing regime is important.
- There is considerable scope to deliver GI within the built areas. A few large trees within the built areas is likely to provide large landscape benefits.

- Tree planting is likely to be an important element of landscape mitigation in terms of views from the AONB and is not likely to require a large depth of trees, but tree height will be important. Developers should be encouraged to undertake any tree planting works as early as possible in the development process so that they can provide mitigation as early as possible.
- Figure 7 shows indicative new woodland planting. It should be made clear that this should not preclude tree planting in areas identified for other uses where it would serve a positive landscape purpose (e.g. possibly the southeast side of Lower Lotmead).
- At present, the landscaping of Redlands appears weak as seen from the AONB. The SPD should be clear that Redlands landscape impacts will be adequately mitigated as seen from the AONB.
- There is considerable emphasis on creating wet meadows. Creating wet grassland priority habitat types can be difficult. Consideration should be given to the soil fertility, hydrology, the target NVC habitat type, and how dedicated and competent the habitat creation and (especially) long term management will be to achieve the target habitat. Perhaps additional consideration should be given to other wetland habitat types (ponds, scrapes, ditches and reed beds). Some of these habitats may, in some locations be easier to achieve and cheaper to manage.
- The document uses the terms “grassland”, “pasture” and “meadow” interchangeably. Pasture and meadow are differing management regimes for grassland, resulting in differing habitat types. Unless the intent is to specify a management regime, we advise the term “grassland” is used.
- Developers should be encouraged to undertake any works around hedge restoration, hedgerow tree planting or coppicing.
- Developers should be required to ensure there is no gap in management between management under agriculture and management as green infrastructure. Significant extra costs may arise if land is left unmanaged.
- Developers should be encouraged to undertake measures to enhance biodiversity as early as possible in the development process so that the biodiversity benefits can flow as early as possible.
- Delivery by village - 4.2.1. In area 1 it is important the green feel of the approach to Nightingale Wood along the Public right of way from the south is preserved.

- Para 4.6.3 says “Trees along retained boundary features”. We suggest this should be a principle throughout the NEV, both in the built and green areas.

The Council’s response

- 5.11 The Council agree that there is more scope to deliver GI within the proposed developable / built areas within the villages. Appropriate areas of GI and open space will be expected as part of each development proposal, in accordance with Policies EN1 and EN3. These will be designed and programmed through a landscape strategy to be submitted through the planning process
- 5.12 The delivery of an extensive network, integral to the design and layout of development proposals will help to deliver a range of open spaces that contribute to the GI network i.e. ‘street level’ provision of trees and play parks to the strategic provision of the green routes that connect villages to major open spaces, local schools, shops, community facilities and services.
- 5.13 All maps have now been reviewed to improve their clarity and presentation.
- 5.14 In relation to the undertaking of landscape works and tree planting, the Council consider that the submission of Landscape Visual Impact Assessments (LVIAs) by developers and as part of development proposals should include details of maintenance and restoration works that are required for all GI assets existing and proposed on site and will be dealt with at the planning application stage.
- 5.15 With regards to tree planting to form an important element of landscape mitigation in terms of views from the Area of Outstanding Natural Beauty (AONB), proposed avenue tree planting has now been included as part of the review of the NEV GI Masterplan to help mitigate and create new woodland areas; positively contributing to the views from the North Wessex Downs (NWD) AONB.
- 5.16 The document has been reviewed to ensure consistency of references to ‘grassland’ areas, unless related specifically to a management regime.
- 5.17 In accord with Policy NC3 high levels of connectivity and a strong relationship with Nightingale Wood will be encouraged throughout the detailed planning stage (xi).
- 5.18 In accord with Policies EN1, EN4 and EN5 the retention of hedgerows and existing landscaping is sought and the design and layout of individual boundary treatments will be assessed through the detailed planning process.

5.19 In summary, comments made from **Sport England** related to the following:

- Sport England supports the Council's intention to provide new residents with a range of open spaces
- It is not clear what built sports facilities (including indoor facilities), if any will be provided with the development.
- As the Masterplan for the site takes shape, Sport England recommends that the Council ensures the developer adheres to the 10 principles for Active Design set out in Sport England's Active Design, with cross reference to resources online at www.sportengland.org/activedesign
- A suggested model development plan policy is attached.

The Council's response

5.20 The Council acknowledge the support from Sport England. The SPD has been reviewed to provide more detail on the delivery of the built sports facilities. The Council will continue to engage with Sport England on sports related matters related to the NEV. The SPD has been updated to include a reference to the Active Design document.

5.21 In summary, comments from the **Canal and River Trust** related to the following:

- The canal route is recognised as important GI and afforded protection in this strategy.

The Council's response

5.22 The Council note the support from the Canal and River Trust.

5.23 In summary, comments from **Wiltshire and Berkshire Canal Trust** related to the following:

- Highlighted details in relation to the aspirations for the canal with no specific comments on the GI strategy.
- Figure 16 of the Green Infrastructure Strategy is unclear but is perhaps trying to depict the potential pedestrian routes across the A420 and mainline railway, which would presumably involve overbridges and tunnels
- Apart from a few references, the strategy document tends to ignore one of the major green infrastructure amenities, namely the Wilts & Berks Canal and Policy EN11
- The proposal to use the canal line in part as a flood defence barrier will make it prominent in some parts of the green space.
- WBCT believes that the developers should construct the canal as an integral part of the flood protection and drainage measures and for its green benefits.
- Figure 16 is unclear but is perhaps trying to depict the potential pedestrian routes across the A420 and mainline railway, which would presumably involve overbridges and tunnels
- Meanwhile the Wilts & Berks Canal would automatically give the opportunity to provide a pedestrian route and wildlife corridor linking the River Cole catchment north and south of the road and railway line.

The Council's response

5.24 The Council notes the comments made by the Wilts & Berks Canal Trust. Amendments have now been made to the SPD to reference the Wilts & Berks canal and Policy EN11, where appropriate, throughout the SPD. With regards to the canal line forming part of flood protection, please refer to the recently adopted Sustainable Drainage Systems (SuDS) Vision for New Eastern Villages (NEV) SPD (adopted February 2017) which provides further guidance on the management of surface water by the use of SuDS.

5.25 With regards to the NEV GI Masterplan (formerly Figure 16), this has now been reviewed to ensure that opportunities to deliver GI at the NEV are in accord with the adopted NEV Masterplan (October 2016). The canal safeguarded alignment currently extends to Acorn Bridge and does not cross the railway line. Thus, further work would be required to review the canal route and would need to inform the review of the Local Plan 2026.

5.26 In summary, comments from **Wiltshire, Swindon & Oxfordshire Canal Partnership** related to:

- SPD fails to incorporate the provisions in Policy EN11 which seeks to safeguard canals. The response recommends inclusion of this into the Strategy.
- Proposal for use of the Wilts & Berks Canal for land drainage and flood alleviation - Technical Note already submitted to Swindon Borough Council and included in Bridge Vision Consultation.

The Council's Response

5.27 The Council notes the comments made. References to Policy EN11, have now been included to throughout the SPD where necessary. Furthermore, a cross reference to the recently adopted NEV Bridge Island Vision SPD is now also included in the NEV GI SPD which is accompanied by the W&BCT's 'Technical Note - Flood Protection of the NEV' (2016).

5.28 In summary, comments from **Wiltshire Wildlife Trust (WWT)** related to:

- It will be important to provide for some areas of sanctuary for species which require relatively quiet areas that are less disturbed;
- The strategy articulates the important role and responsibility that developers have to play in consulting with communities, and potential partner organisations in helping to achieve the integrated GI objectives;
- Support the ambition to create a new network of green spaces and green routes based around species rich grasslands and central river meadows, interconnecting all of the villages;
- WWT is delighted to see proposals to include a new Visitor Centre at the heart of the River Meadows Nature Reserve, as a place where people can engage and be involved with nature conservation, the natural environment and local heritage;
- Agree that developers should be expected to deliver and provide for the long term management and maintenance of GI that is required as a result of development at NEV;
- So far no one has approached the Trust to discuss and consider either GI provision or proposals for enhancement of Biodiversity;

- WWT endorse the requirement that developers design and enhance natural water management features;
- Planning obligations secured for GI at the NEV will be directed towards priority habitats and ecological habitats, which should be reconciled with SuDs and other key considerations;
- The Trust has a great amount of ecological expertise and would like to be involved in the development of the proposals for the habitats network. The creation of economically sustainable and viable grazing units requires significant integration and careful thought across the River Meadows Nature Reserve;
- Village Master plans should be consistent with and contribute directly to the overall vision for GI across the NEV. They should integrate across individual village development boundaries.
- It would be helpful to integrate the planning for schools provision, in with the GI network, enabling school children to have easy access to nature, building on the opportunity that GI provides for a unique educational setting for all age groups.

The Council's Response

- 5.29 Swindon Borough Council note the supporting comments from the Wiltshire Wildlife Trust and Council welcome the Woodland Trust's offer as a potential partner to help facilitate and deliver GI at the NEV.
- 5.30 With regards to provision of areas to provide sanctuary for species and creation of economically sustainable and viable grazing land requiring significant integration as part of the River Meadows, the Council consider such points are pertinent to the delivery of an effective network and reiterates the importance of working in partnership with the key stakeholders including the Wiltshire Wildlife Trust.
- 5.31 Support noted with regards to the Visitor Centre, the Council will work with delivery partners and stakeholders to determine appropriate specifications for the Visitor Centre including flexible shared space, and provide the long term management and maintenance required. The Visitor Centre should be sustainable in the broadest sense of the word, including financially.
- 5.32 With regards to planning for schools, the SPD recognises the potential that an extensive green infrastructure network can facilitate easy access and

movement to local services and facilities including local schools, open spaces and play areas. The GI Masterplan reflects this integrated approach.

5.33 In summary, comments from the **Woodland Trust (WT)** related to:

- The WT strongly welcome the development and publication of a GI SPD for the NEV.
- It is important to be mindful of the complexity of a development scheme on this scale which includes multiple landowners and developers. It is essential that appropriate phasing and delivery mechanisms are in place
- Concern that some of the green corridors identified on the Masterplan may be too narrow to enable the full benefits to be realised.
- The WT support the explicit commitment to achieve a net increase in woodland cover, with a focus on strategic locations which create nature corridors and enhance biodiversity. The Woodland Trust believes that trees and woodland are an essential element of place making as they can deliver such a wide range of benefits. Our publication Residential Development and Trees highlights the key issues for developers to consider. We would welcome a reference to this publication in the SPD.

The Council's response

5.34 Swindon Borough Council note the supporting comments from the Woodland Trust and the Council welcome the Trust's offer as a potential partner to help facilitate and deliver GI at the NEV. The Council will continue to proactively work with landowners and developers to understand the opportunities to mitigate the impact of development, including the creation of new woodland areas where opportunities exist, both on and off site.

5.35 With regards to the green corridors, the GI Masterplan has been reviewed to improve consistency and clarity and to ensure that opportunities to deliver GI at the NEV are in accord with the adopted NEV Masterplan (October 2016).

5.36 A reference to the 'Residential Development and Trees' publication is now included in the SPD.

5.37 In summary, comments from **Councillor Gary Sumner (Ridgeway Ward)** related to:

- Should include the SCR and an explanation of how the Wanborough Road will be managed as a key 'non-coalescence' route.

- Development does not appear to be phased and will not be softened by flat farmland unless the land is acquired and woodlands are planted before building commences
- Require certainty of delivery of a key piece of landscaping to soften the impact of development in Redlands and nearby parcels
- Bearing in mind the cost of delivery, combined with the damage to sports from relying on playing pitches which are inaccessible year round - this should be reconsidered
- Sports hub is shown in floodplain
- No detail of how the SCR will be screened or softened? What landscaping and planning will be required to achieve noise pollution restrictions (the site immediately adjoins the busy A419 and the Western boundary and SCR to the South).
- Table 2: Visual Impact Assessment is not up to date
- As a Roman road there should be no damage to the ditches and hedgerows but there must be detail on who will maintain both once farmers no longer farm the adjoining land?
- Plan should reflect potentially increased housing numbers as officers have indicated the overall number could reach 10,000 homes
- Early planting should take place to mitigate views from the AONB and the South

The Council's Response

- 5.38 The LPA acknowledge that the SCR will pass through a sensitive landscape and in relative proximity to residential properties. It will be designed to minimise visual intrusion, noise and pollution from vehicle emissions. The planning application for the SCR will be submitted as a full application to include landscaping and other mitigation measures and be subject to full public consultation, including pre-submission consultation with directly affected land and property owners.
- 5.39 The Council's indicative approach to phasing at the NEV is set out in the Local Plan and as part of Policy NC3 and accompanying Figure 11. It is appreciated that proposed development may come forward out of phase. The adopted NEV Planning Obligations SPD will ensure that development provides mitigation and will provide for interim measures until such time infrastructure is built.

- 5.40 Outside of the NEV allocation, the Council will seek to work with landowners to identify opportunities to deliver community tree planting in appropriate areas.
- 5.41 Sports Hubs will be located outside of high risk flood risk areas. Detailed design, including additional drainage provision and use of artificial “3G” surfaces will ensure that pitches are useable all year round.
- 5.42 With regards to Table 2, this has been removed from the SPD.
- 5.43 The Council acknowledge that important hedgerows should be protected. Details of off-site improvements (provision of footway) to existing roads, including Wanborough Road, will be carefully considered at the detailed planning stage.
- 5.44 In accord with Policy NC3, the SPD will support the NEV allocation in line with the requirement to deliver about 8,000 dwellings as part of a mixed use development. The SPD acknowledges that in the event that the number of dwellings exceeds 8,000, there will be a need to consider any additional GI requirements. Additional wording has been added to end of this paragraph to make it clear that the mechanism to do this would be through a review of the NEV IDP.
- 5.45 The Council will seek to work with landowners and developers to identify opportunities to deliver community tree planting in appropriate areas.

Parish Councils

- 5.46 In summary, comments from **Liddington Parish Council** relating to:
- Endorse the comments made by Councillor Gary Sumner in his letter attached (dated 30th March 2017).
 - Highlight the importance of para 1.0.18 detailed in the document.

The Council's Response

- 5.47 The Council note the comments made by Liddington Parish Council. Please refer to the response provided at paragraphs 5.38 to 5.46 of this report.
- 5.48 In summary, comments from **Bishopstone Parish Council** relating to:
- The Council support the comments made by Councillor Gary Sumner (Ridgeway Ward).

The Council's Response

5.49 The Council note comments made by Bishopstone Parish Council. Please refer to the response provided at paragraphs 5.38 to 5.46 of this report.

5.50 In summary, comments from **Haydon Wick Parish Council**, relating to:

- The Council expressed concern as to the adverse impact the housing and retail development may have on the environment, in relation to the effects of pollution caused by the increased volume of traffic.
- The congestion on the A420 can only exacerbate the situation.

The Council's response

5.51 The Council note comments made by Haydon Wick Parish Council. The SPD will serve to deliver an extensive GI network which will serve to mitigate the impacts of development. The adopted NEV Planning Obligations SPD (October 2016) provides further information on the Strategic Highway schemes that will be delivered to minimise the impacts of increased volume of traffic.

5.52 In summary, comments from **South Marston Parish Council**:

- The Landscape Visual Impact is focused mainly on views affected from outside the NEV, with just one internal viewpoint facing outwards from the main development.
- 'Anti-coalescence' land, as described for south of the expanded South Marston village, is particularly inappropriate.
- The first sections from 3.1.14 to 3.1.19 are largely irrelevant as is Table 2 on page 23
- Consider that Key Principle 1 (Landscape Character) should specifically mention the need for developers to consider the detailed visual impacts identified for new and existing residents, as well as users of proposed new and existing rights of way, to enable formulation of an appropriate landscaping plan for each of the proposed developments.
- We consider that there is a need for significant screening from public viewpoints, particularly of new roads passing through open countryside, as proposed within the planning applications for the expansion of South Marston

- Concern is raised in relation to the provision of a centralised strategy, based around an expensive Visitor Centre situated outside the settlements and divorced from South Marston and Rowborough,
- The River Meadows concept is said to form the 'green heart' of the NEV development and to provide an integrated GI solution. No reference is made to the fact that the NEV is split in two by the A420/railway.
- Anti-coalescence' land, as described for south of the expanded South Marston village, is inappropriate.
- Concern that the document fails to reflect the proposed 'green wedges' outlined in the draft South Marston Neighbourhood Plan, and which are already enshrined in the relevant planning application covering the expansion of South Marston.
- It is worth noting that, the green wedges, together with the anti-coalescence area and the fields between Oxleaze Wood and the main expansion will all have public access, and this will affect their potential use and maintenance costs
- The GI Masterplan requires attention. It is rudimentary in outlining the relevant housing areas as identified in the SBC NEV Masterplan.
- Consideration should be given to designating the green wedges, together with the anti-coalescence area and the fields between Oxleaze Wood and the expanded village (all of which are proposed to have public access) as GWCF land.
- SBC needs to decide whether NEV planning applications will, via conditions, designate areas of GI land which will be given public access as Community Forest.
- Potential for extending woodland at South Marston is not reflected by the introduction of a small copse at an arbitrary location to 'strengthen the buffer' between the railway and the open spaces.
- The term 'Sports Hubs' seems to be allied to pitches in village centres as well as out of settlement multi pitch hubs such as south of Rowborough.
- The Playing Pitch Strategy (which is expected to show a radical decline in demand for pitches) is mentioned. It would be useful to know how its findings will be incorporated into this GI strategy
- In particular we suggest that the maintenance requirements for the GI within the housing areas, such as LEAPs and LOSs, are of a different

order to the challenges of delivering and maintaining the wider area of GI and the possibility of a differentiated approach to future maintenance arrangements should be explored

The Council's Response

- 5.53 The Council note the comments made by South Marston Parish Council. Information relating to Visual Impact Assessment, including Tables 1 and 2 have been removed from the SPD.
- 5.54 Development proposals will be expected to provide Landscape Visual Impact Assessments to fully assess landscape impacts and mitigation.
- 5.55 There is a requirement for a village centre within South Marston to support the village. The Council will work with delivery partners and stakeholders to determine appropriate specifications for the Visitor Centre. The Visitor Centre should be sustainable in the broadest sense of the word, including financially.
- 5.56 Following consultation, all maps have been reviewed and updated to improve consistency and clarity. In particular, the NEV GI Masterplan has been reviewed to ensure that opportunities to deliver GI at the NEV are consistent with policy and accord with the adopted NEV Masterplan (October 2016).
- 5.57 The SPD is in accord with the draft South Marston Village Neighbourhood Plan and the 'Proposed Strategic Routes' (Plan 6 as detailed in the Draft Neighbourhood Plan) has been included in the SPD.
- 5.58 There is now further explanation regarding the specification of the sports hubs in the SPD. In accord with Policy RA3, the SPD acknowledges that South Marston will deliver improvements to recreational facilities of an appropriate type and scale to support the village. A draft of the Playing Pitch Strategy for Swindon Borough will be available for public consultation at the end of July 2017.
- 5.59 In summary, comments from **Wanborough Parish Council** relate to:
- How will SBC ensure that these woodlands are implemented when the land is privately owned?
 - All future maintenance of SuDs should be covered by a management company for the area, they should not become the responsibility of Local Councils who will be unable to cover the additional financial burden.
 - How will Wanborough road be protected with proposed access from Redlands site onto Wanborough Road, and also the SCR will have to cross over the road.

- The play pitch strategy needs to be strengthened to include more open spaces, village greens and areas where children can go and play.
- Flood zones should not be used to provide open spaces and sports facilities, these need to be allocated outside the flood zone areas.

The Council's Response

- 5.60 The Council will continue to proactively work with landowners and developers to understand the opportunities to mitigate the impact of development and create new woodland areas where opportunities exist, both on and off site.
- 5.61 Wanborough Road provides an opportunity to enhance the existing footpath and cycleway network and provide improvements to connectivity between Wanborough and the NEV development. However, it is accepted that Wanborough Road is inappropriately referenced as 'key non-coalescence corridor'. The annotation has now been removed from the map.
- 5.62 The draft playing pitch strategy focuses upon the provision of formal playing pitches (both natural turf and artificial surfaces) that accommodate pitch based sports, namely football, rugby, cricket and hockey. It does not explicitly address open spaces that facilitate informal play. However, can help to inform an update to the open space audit and assessment to identify future demand etc.
- 5.63 Agree. The design and layout of open spaces should be in accord with the Sustainable Drainage Systems (SuDS) Vision for NEV SPD adopted in February 2017. The SPD recognises that through careful design and in line with Health and Safety considerations SuDS can be designed as part of public open space.
- 5.64 In summary, comments from **Stratton St Margaret Parish Council** relating to:
- Concern that the NEV development will mean inevitable traffic congestion and its attendant 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 (Great Stall Bridge)

The Council's Response

- 5.65 The Council note the comments made. The new bridge referred to by Stratton Parish Council is the Great Stall Bridge. The provision of this bridge is identified in the NEV Planning Obligations SPD as part of the strategic transport package at the NEV and will provide a new link across A419 to

facilitate public transport, walking and cycling and to integrate the new District Centre with the existing communities in East Swindon.

5.66 In summary, comments from **Historic England** (HE) relating to:

- HE emphasise the need to avoid conflict between tree planting and buried archaeology
- HE is anxious to ensure that the recent surveys showing how the Roman Town extends beyond the limits of the scheduled area is reflected in the SPDs, and informs the proposed villages of Foxbridge and Upper Lotmead.
- Paragraph refers to Scheduled monument and recent discoveries but doesn't confirm how such nationally significant archaeology will be safeguarded.
- Historic England would emphasise the need to ensure a conflict between tree planting and buried archaeology is avoided

The Council's Response

5.67 The Council notes the comments made by Historic England. All maps have been reviewed and updated to improve consistency and clarity. In particular, the NEV GI Masterplan has been reviewed to ensure that opportunities to deliver GI at the NEV are in accord with the adopted NEV Masterplan (October 2016). Archaeological surveys will inform any subsequent review of the SPD and development proposals at the planning application stage.

5.68 Paragraph 3.4.9 (formerly 3.5.9) references SBLP Policy EN10 which seeks to safeguard Scheduled Monuments and nationally significant archaeology. A reference to nationally important archaeological sites has been added to paragraph 3.5.

5.69 In summary, comments from **Great Western Hospital** relating to:

- Population growth without investment will compromise the delivery of high quality, safe service delivery, and this is particularly so given that the system is already under pressure
- Building design should take in to consideration walking and play surfaces...this space could also provide a meeting area for older people to socialise, have coffee and develop as activity hubs.

The Council's Response

- 5.70 Unless directly related to development at the NEV there is no policy basis to secure contributions towards the GWH. Such evidence can inform the Local Plan Review in response to planned development at Swindon post 2026.
- 5.71 There are a number of principles that relate to health and well-being. These can help to inform emerging work on design codes for the NEV.
- 5.72 In summary, comments from **Public Health (SBC)** relating to:
- Generally in relation to active travel there is a very positive approach to movements within and between the villages
 - It would be valuable to see greater detail on how the outcomes of GI delivery and maintenance will be achieved with a clearer model of long-term sustainability.
 - 'health and well-being' could be added to the list which is 3.0.1
 - The quality of a number of the maps are poor and the legend is very difficult to read
 - There is little discussion of people coming to the NEV for recreation and use of GI
 - In general the current strategy does not convince the reader that active or green transport is going to be achievable for most people in the NEV to/from work
 - Clearer descriptions of the anticipated impact of the GI on active travel could add weight to this aspect of GI
 - There is no discussion of direct effect on biodiversity or health and wellbeing during the building process
 - Greater clarity about the woodland planting (both on and off-site) would be valuable, along with how the village masterplans fit into off-site GI.
 - A general explanation of the Great Western Community Forest including what it is, how it functions and future plans would help those not familiar
 - Inclusion of some rough area values for these specific GI areas may be beneficial but needs to be weighed against the potential that this may cause difficulties for wider GI delivery or limit delivery of these specific types to stated values

- An emphasis on local products and sustainability would tie this strategy into wider sustainability considerations and increase the benefits as well as long-term sustainability
- There are quite a large number of acronyms and references to policies, which a glossary/signposting may assist with.

The Council's Response

- 5.73 The overall NEV proposals provide for improved travel routes into Swindon, including a prioritised bus link and associated footpath-cycleway link across the A419 via the proposed Great Stall Bridge (as shown on the Illustrative NEV Masterplan).
- 5.74 The document proposes a comprehensive network of new footways and cycleways both within green corridors and alongside primary streets which will provide connectivity within the NEV.
- 5.75 The overarching GI strategy is planned against the background of the Local Plan 2026 (Natural and Built Environment policies) which set out a comprehensive set of policies that the NEV will achieve. Delivery and maintenance of GI will be secured by legally binding agreements between developers and the LPA (or relevant Parish Council to ensure long-term sustainability).
- 5.76 A description of the GWCF and its purpose within the context of delivering GI at the NEV is now detailed in the SPD.
- 5.77 Detailed design, specification and management of the proposed GI will help to ensure that it is multi-functional.
- 5.78 Following consultation, all maps have been reviewed and updated to improve consistency and clarity. In particular, Figure 16 has been reviewed to ensure that opportunities to deliver GI at the NEV are in accord with the adopted NEV Masterplan (October 2016)
- 5.79 A reference to Health and Well-being is added to paragraph 4.0.1, as relates to the provision of public open space.
- 5.80 Partnership working will be a key platform and developers will be required to demonstrate that their GI proposals (which will be subject to reserved matters approval) are well designed and sustainable.
- 5.81 GI provision must be in accordance with Local Plan 2026 policy requirements. The nature of the NEV land, with a network of flood risk corridors which cannot be built on will result in open space provision in excess of policy

requirements; the potential for about 300 hectares of GI translates to over 40% of the total NEV “red line” area of 724 hectares.

- 5.82 With regards to open space standards, the reference to ‘1000 per population’ omitted in error has now been added to the text for clarity.
- 5.83 Opportunities for food production through the provision of allotments; the retentions of land for agricultural use will be explored, particularly at the River Meadows. There may be limited opportunity for willow coppicing or similar timber production (for energy) in the future.
- 5.84 The opportunities for sustainability initiatives will be explored in detail at Design Coding/Reserved Matters stage(s).
- 5.85 A glossary of terms has now been provided to improve clarity of the document.
- 5.86 In summary, comments from **Thames Water** relating to:
- Any flood risk strategy/policy should include reference to sewer flooding and an acceptance that flooding could occur away from the flood plain as a result of development where off site infrastructure is not in place ahead of development.
 - It is vital that sewerage/waste water treatment infrastructure is in place ahead of development if sewer flooding issues are to be avoided.
 - It should also be recognised that SuDS are not appropriate for use in all areas [they] also require regular maintenance to ensure their effectiveness.
 - Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which the surface water enters the sewer system.

The Council’s Response

- 5.87 The Council note the comments made by Thames Water. The comments relate more specifically to the adopted NEV SuDS Vision for the NEV SPD (February 2017). However, it is important to note that the Council will ensure that new development in the NEV can provide adequate infrastructure (Wastewater and Water Supply) to ensure it will not impact on any existing infrastructure that could lead to problems for existing users or that development is not carried out until Thames Water have provided the necessary strategic infrastructure as planned.

5.88 The Council will continue to consult Thames Water on any development proposals for the NEV.

5.89 In summary, comments from Turley's on behalf of **Ainscough Strategic Land** relate to:

- It is reasonable that the GI plan submitted by Ainscough is a suitable starting point to develop the wider NEV GI Masterplan.
- Our client makes this representation to ensure that the proposed GI SPD does not inadvertently prejudice the future development of Lotmead Farm or place an unreasonable burden on developers which could in turn impact viability.
- At a number of junctures the draft SPD seeks to facilitate the delivery of GI outside of the NEV allocation boundary
- This woodland falls outside the NEV allocation boundary and therefore falls outside the scope and remit of the SPD; the imposition of additional planting beyond the NEV would unnecessarily increase the levels of infrastructure investment and result in disproportionate financial burdens.
- It is not clear how the proposed areas or volume of new woodland have been identified as suitable, particularly as no such woodland was identified at a time when the NEV allocation was proposed/made within the adopted Local Plan
- The Proposed GI Masterplan for the NEV completely disregards the innovative design solution put forward by the willing landowner. The introduction of a sports hub within the draft GI SPD is overly prescriptive and, in the absence of any design rationale or consultation with the landowner, it places an unreasonable burden on developers, such that this prevents competitive returns.
- Further justification for the proposals contained within the draft GI SPD is required, particularly with regard to viability, and to ensure the SPD is not overly prescriptive it is advised that all figures and maps are identified as 'indicative' rather than 'proposed'.
- It is requested that the Council does not move to adopt the SPD until it has been substantially revised, such that it accords with its stated scope and sets out policies which can be considered to be properly justified and reasonable.

The Council's Response

- 5.90 The Council note the comments made by Ainscough Strategic Land. The costings associated with the delivery of GI are set out in the adopted NEV Planning Obligations SPD (adopted October 2016). The Council consider that the SPD cannot be confined to the NEV boundary or dealt with in isolation from the rest of the Borough. This is to ensure that the potential opportunities for delivering an extensive network at the NEV and to connect to the wider network can be realised. It will be given its own weight in the consideration of any future planning application.
- 5.91 The Council will continue to proactively work with landowners and developers to understand the opportunities to mitigate the impact of development and create new woodland areas where opportunities exist, both on and off site.
- 5.92 All figures have been updated to reflect that the plans are for 'illustrative' purposes. The SPD has been reviewed since public consultation.
- 5.93 In summary, comments from **Barberry (Swindon) Ltd** relate to:
- There is no justification for the provision of GWCF on site
 - The planning application at Redlands provides a hierarchy of on-site GI but it should be noted that formal sports provision is not to be included in the Redlands allocation
 - Art, heritage and education are separate policy issues and should not be included in the draft SPD.
 - 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.
 - It is apparent from discussions with the local planning authority that the overall infrastructure costs are excessive and are causing problems with viability
 - It is also apparent that some of the infrastructure requirements are not justified when considered in respect of the CIL regulations and relevant policies in the Framework.

The Council's Response

- 5.94 The Council note the comments made by Barberry (Swindon) Ltd.
- 5.95 The costings associated with the delivery of GI are consistent with policy and set out in the adopted NEV Planning Obligations SPD. The document

recognises the contribution that art and heritage can deliver as part of a comprehensive GI network at the NEV. Following consultation, all maps have been reviewed and updated to improve consistency and clarity. In particular, Figure 16 has been reviewed to ensure that opportunities to deliver GI at the NEV are in accord with the adopted NEV Masterplan (October 2016).

5.96 In summary, comments from **Bluestone Planning** relating to:

- The requirement to submit LVIAs must relate proportionately to the location and/or scale of development proposed.
- This SPD should not be used to require applicants to provide additional technical information where not otherwise appropriate.

The Council's Response:

5.97 The Council notes the comments made by Bluestone Planning. Information relating to Visual Impact Assessment has now been removed from the SPD. The purpose of the SPD is to provide further guidance on the delivery of GI at the NEV.

5.98 In summary, comments from **Hallam Land Management Ltd, Hannick Homes & Developments Ltd. and Taylor Wimpey UK Ltd. (HHT)** relate to:

- Extensive survey work and technical analysis on land north of the A420 and can confirm that ancient marshland is not present in the areas south of South Marston.
- Page 33 includes an extract from the draft South Marston Neighbourhood Plan. This has not been 'made' and as such should not be included in the draft SPD.
- The draft SPD is not consistent with the planning context in which it sits and does not clearly articulate its evidence base
- The draft DPD exceeds the scope that is appropriate in a SPD 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 to an Illustrative Masterplan, that is acknowledged to be iterative
- The national nor local policy position justifies the approach set out in the SPD and no reference is made to PPG.

- The SPD focuses on the creation of new habitats with no regard to resources that already exist which should form the starting point of any such GI framework, and should form part of any such quantum/provision that might be required through policy
- The wording "indicative" accepts that the precise boundaries of the development parcels are to be refined through the development management process in combination with detailed master planning and design for those specific areas.
- The draft SPD does not make it implicit that GI is not solely related to the provision of new landscape habitats, but that retained features can also contribute significantly to the overall quantum of GI provided as part of the development of the NEV.
- The draft SPD refers to the provision of a visitor centre that seeks to support visitor attraction aligning to a leisure and nature function. There is limited information available in respect of this element, certainly HHT are not aware of any detail in relation to such a resource.
- There is no clarity as to who would deliver the woodland and from what funding sources
- The figures contained within the document do not appropriately reflect the policy extent of the NEV "development islands" and whilst it is understood that this document has a GI focus, presentationally, it could be considered misleading.
- The inclusion of art, heritage and education within a GI focused document is unsubstantiated. It has the effect of applying prescription across a number of areas that are not directly relevant to the principal scope of the document.
- The inclusion of plans Figure 11 (recreation) and Figure 13 (art, heritage and education) prejudices the masterplan and imposes and applies a level of prescription that is not supported in the Local Plan
- Landscape management companies can provide long-term management solutions for a variety of open space and biodiversity resources. Formal and informal open space resources can also be passed to local community groups and/or town and parish Council to secure their long-term management therefore additional text should be included in the document that supports an option to consider third party management strategies
- Figure 2 identifies significant woodland that is no longer present (just south of 'W3'). This should be amended not just on this figure, but within all

figures in the SPD which incorrectly identify woodland at the eastern extents of Rowborough.

- Rowborough - References to greenway links should be more generalised.
- There is no clarity as to who would deliver the woodland and the funding streams available to enable delivery.
- Additional text should be provided at paragraph 2.0.21 that reflects that the masterplan is evolving as are the development proposals associated with the NEV.

The Council's Response

- 5.99 The Council notes the comments made by HHT. The policy framework for the SPD is based upon a robust evidence. There are significant opportunities to deliver 'an extensive green infrastructure network' as detailed in Policy NC3. The SPD provides further detail and guidance on how this can be delivered.
- 5.100 Following consultation, all maps have been reviewed and updated to improve consistency and clarity. In particular, Figure 16 has been reviewed to ensure that opportunities to deliver GI at the NEV are in accord with the adopted NEV Masterplan (October 2016)
- 5.101 The GI Masterplan considers both existing and proposed GI at the NEV. It is important that development seeks to protect and enhance both existing GI assets together with delivering the GI requirements as a result of development.
- 5.102 Section 1 makes reference to PPG as it relates to GI.
- 5.103 The map serves to identify opportunities for community woodland planting as part of proposals. The map does not reflect existing woodland areas.
- 5.104 Reference to the status of the document has now been made in both the policy section and the extract from the draft SMV NP.
- 5.105 All maps are illustrative with the key principles consistent with policy

5.106 In summary, comments from **The Blatchford Family** related to:

- In its present form the GI SPD is seeking to allocate sites and form land use policies not in accordance with the Local Plan and without the basis of adopted land use policies.
- Viewed from the perspective of my client's land, the NEV GI SPD is seeking to make it an entirely GI site to serve other developments with absolutely no mechanism for equalisation of the infrastructure burden making my client's land worthless with no mechanism to recoup the uplift values from the sites that rely upon it
- Throughout the SPD the plans are of very poor quality and it is difficult to determine the details that apply to sites.
- Whilst commendable in theory this whole approach to GI is poorly presented and unrealistic and without any mechanism to equalise land values, or capture land value uplift through CIL. It is doomed to failure as it has no monetary mechanism for land identified as GI held by parties (over and above the Nature Reserve and GWCF) who do not have land that will contain built development.
- There is a similar mechanism used elsewhere in the planning system whereby the provision of Green Space (SANG) for Habitat mitigation is set out in policy and must be brought forward before development is occupied to allow proper monetisation of the GI to support development when the sites are in different ownerships.

The Council's Response

5.107 The Council notes the comments made. The land forms part of the land allocation of the NEV and as identified by Figure 11 of the Local Plan 2026 (Policy NC3), but is not identified for a specific use within the Local Plan. For this reason the Illustrative NEV GI Masterplan has been amended to remove the proposed land use designation (proposed woodland).

5.108 The NEV will be developed by a number of land promoters / developers who will be required to provide GI as part of their development proposals in line with Local Plan 2026 Policy (NC3, RA3 and EN policies). The NEV GI SPD is underpinned by the Local Plan.

5.109 Following consultation, all maps have been reviewed and updated to improve consistency and clarity. In particular, Figure 16 has been reviewed to ensure that opportunities to deliver GI at the NEV are in accord with the adopted NEV Masterplan (October 2016).

5.110 In summary, comments from Turleys (on behalf of Wasdell Commercial Properties) relate to:

- Land at Inland Farm which is being promoted for economic development.
- The site is situated outside of the New Eastern Villages Local Plan allocation, but is located in close proximity to it.
- Further, our client's land interest is related to the allocation by virtue of the Southern Connector Road and the proposed new alignment of the Wilts & Berks Canal, which potentially intersects the site, and which could be facilitated as a result of its development.
- Accordingly, our client submits these representations to ensure that the proposed Green Infrastructure SPD does not inadvertently prejudice the future development of the manufacturing facility (and the 800 local jobs that depend upon the success of that proposal). Conversely, the representations seek to identify how the proposed development of land at Inland Farm would extend Green Infrastructure provision east of Swindon.
- As currently prepared, the draft New Eastern Villages Green Infrastructure SPD does not fully comply with the Town and Country Planning (Local Planning) (England) Regulations 2012. Nor can the proposals contained within the draft document be said to entirely align with the adopted Local Plan.
- The draft SPD seeks to implement policies and proposals that go beyond the scope boundary of the allocation and which alter the meaning of adopted Local Plan policies. There may also be opportunities to revisit and enhance some of the proposals such that Green Infrastructure to the east of Swindon is more holistically provided.

The Council's Response

5.111 The Council notes the comments made by Turleys on behalf of Wasdell Commercial Properties. The site is not within the identified strategic allocation of the NEV and is not directly relevant to the SPD. Such proposal will need to be considered as part of the review of the Local Plan 2026.

5.112 The SPD is consistent with the Local Plan and the adopted NEV Masterplan (October 2016), providing further guidance with regards to the delivery of GI at the individual village level. The key principles set out are consistent with the policy position.

6. Post consultation changes made to the NEV Green Infrastructure SPD

6.1 As a result of comments made to the revised draft SPD, the following key changes have been made to the NEV GI SPD are:

- A review of the Illustrative NEV GI Masterplan and illustrative maps to improve clarity, consistency including the presentation and annotation of maps;
- Amendments to reflect partnership working from the Woodland Trust and the Wiltshire Wildlife Trust;
- Removal of Table 1 and 2 and all text related to the Landscape Visual Impact Assessment;
- Amendments to ensure consistent references to local plan policy and other NEV and GI related documents;
- A Glossary of terms is appended to the document to help understanding of green infrastructure related terms; and
- Amendments made throughout the document to improve the consistency of terms used with green infrastructure typologies.

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

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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