



The Planning Inspectorate

Report to Swindon Borough Council

by Mike Fox

an Inspector appointed by the Secretary of State for Communities and Local Government

Date 5 February 2015

PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)
SECTION 20

REPORT ON THE EXAMINATION INTO THE SWINDON BOROUGH LOCAL PLAN

Document submitted for examination on 28 June 2013

Examination Hearings held between 29 April and 22 May 2014

File Ref: PINS/U3935/429/7

CONTENTS	Page
Abbreviations used in this Report	4
Non-Technical Summary	5
Introduction	7
Assessment of Duty to Cooperate	8
Assessment of Soundness	10
Main Issues	11
Issue 1 – Does the Plan provide the most appropriate spatial strategy for the development of Swindon over the plan period?	11
Issue 2 – Is the Plan's approach to the Borough's housing provision, in terms of its overall requirement, its distribution – including the proposed New Communities – and deliver, sound? Are the needs for particular types of housing, including affordable housing, addressed satisfactorily?	13
Issue 3 - Is the Plan's framework for the economy, including the provision of employment land, town centre regeneration, retailing and offices, appropriate to meet the needs of Swindon and its hinterland?	23
Issue 4 – Is the infrastructure needed to accommodate the Plan's strategy positively prepared, justified and deliverable within the plan period?	28
Issue 5 – Is the capacity and quality of the existing and proposed transport network sufficient to accommodate the scale and distribution of growth planned for Swindon?	32
Issue 6 – Does the Plan provide a clear and integrated framework for conserving, managing and enhancing the Borough's Green Infrastructure, biodiversity and other environmental assets? Does it provide a sustainable framework for responding to climate change, renewable energy, biodiversity and other environmental assets?	35
Issue 7 – Are the proposed New Communities positively prepared, justified and deliverable?	37
Issue 8 - Are the Plan's policies for rural settlements positively prepared, justified and deliverable?	47
Issue 9 – What is the appropriate level of detail in the Plan, and what should be left to supplementary planning documents?	48
Issue 10 - How does the Plan manage development? How does it deal with uncertainties and risks? How effective is the Plan's monitoring – are there clear indicators and targets to measure whether the policies are going to be effectively implemented?	51

Other matters	51
Assessment of Legal Compliance	52
Overall Conclusion and Recommendation	52
Appendices	
Appendix 1 – Schedule of Proposed Main Modifications to the Swindon Borough Local Plan 2026	
Appendix 2 – Changes to the Inset Diagrams and policies Map	

Abbreviations Used in this Report

AH	Affordable Housing
AONB	Area of Outstanding Natural Beauty
BOD	Biochemical oxygen demand
CAAP	Central Area Action Plan
CIL	Community Infrastructure Levy
CPRE	Campaign to Protect Rural England
DCLG	Department for Communities and Local Government
DMRB	Design Manual for Roads and Bridges
dph	Dwellings per hectare
DTC	Duty to Co-operate
EA	Environment Agency
EU	European Union
G&T	Gypsies and travellers
GI	Green Infrastructure
GTAA	Gypsies and Travellers Accommodation Needs Assessment
HA	Highways Agency
HMA	Housing Market Area
HRA	Habitats Regulation Assessment
HRR	Household representative rates
IDP	Infrastructure Delivery Plan
IPL	Infrastructure Priority List
IR	Inspector's Report
LEP	Local Enterprise Partnership
LDS	Local Development Scheme
LFRMS	Local Risk Flood Management Strategy
LNP	Local Nature Partnership
LTP	Local Transport Plan
MfS	Manual for Streets
MM	Main Modification
NE	Natural England
NEV	New Eastern Villages
NP	Neighbourhood Plan
OAHN	Objectively assessed housing need
OCC	Oxfordshire County Council
ONS	Office For National Statistics
PC	Parish Council
PDL	Previously developed land
PPG	Planning Practice Guidance
PPTS	Planning Policy on Traveller Sites
PUA	Principal Urban Area
RSL	Registered Social Landlord
RSS	Regional Spatial Strategy
SA	Sustainability Appraisal
SADPD	Site Allocations Development Plan Document
SCG	Statement of Common Ground
SCI	Statement of Community Involvement
SCR	Southern Connector Road
SFRA	Strategic Flood Risk Assessment
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SPD	Supplementary Planning Document
sq m	Square metre
SSSI	Site of Special Scientific Interest
SuDS	Sustainable drainage system
SUE	Sustainable Urban Extension

Non-Technical Summary

The Swindon Borough Local Plan provides an appropriate basis for the planning of the Borough, providing a number of modifications are made to the Plan. Swindon Borough Council has specifically requested me to recommend any modifications necessary to enable the Plan to be adopted. All of the modifications to address this were proposed by the Council but where necessary I have amended detailed wording and/or added consequential modifications and I have recommended their inclusion after considering the representations from other parties on these issues.

The Main Modifications can be summarised as follows:

- Introduce a clear commitment to an early review of the Plan (policy SD2 and supporting text), to provide an objective assessment of need and a basis for housing and employment land provision and infrastructure provision over the period to 2031;
- Amend policy SD3 to refer to the model policy on sustainable development; and policy DE2 to clarify the Plan's stance on sustainable construction;
- Clarify the link between the Borough's housing requirement and the Swindon Strategic Housing Market Assessment (SHMA) in policy HA1.
- Provide an updated housing completions trajectory.
- Clarify the need for the Plan to respond to the needs of the ageing population in policy HA1 and supporting text;
- Introduce changes to gypsies and traveller accommodation in policy HA8 and supporting text, to refer to the needs as identified in the GTAA, and to refer to meeting these needs in a SADPD in line with national policy;
- Free up the development of vacant commercial premises in policy EC2;
- Introduce greater flexibility into policy NC3 for retail floorspace provision in the NEV;
- Clarify supporting text to policy TR1 in relation to air pollution;
- Increase protection of polluted and unstable land in policies EN7-9;
- Include changes relating to protecting sensitive ecosystems from water supply or sewerage treatment facilities and air pollution; to refer to the Green Infrastructure (GI) and GI Concept Map; and protect irreplaceable habitats from development in policies IN2, EN1 and supporting text;
- Amend policy EN5 regarding AONB protection;
- Clarify the protection of Heritage Assets in policy EN10;
- Ensure that the future alignment of canal proposals are provided for and do not cause an unacceptable risk to ecology, flood risk, water resource and water quality, in policy EN11;
- Safeguard the route of the Swindon and Cricklade Railway from Taw Hill Halt to Mouldon Hill in policy EN11;
- Change the references in policy TR1 and elsewhere from rapid transit to express bus network;
- Clarify key transport proposals, including White Hart Junction and access to Tadpole Farm in supporting text to policy NC3 and in policy

NC4;

- New Communities - Clarify and add appropriate detail to the following major housing and mixed use allocations within Wichelstowe (policy NC1 and supporting text); Commonhead (policy NC2 and supporting text) New Eastern Villages (NEV) (policy NC3 and supporting text); Tadpole Farm (policy NC4 and supporting text); and Kingsdown (policy NC5 and supporting text);
- Include a low carbon electricity target to clarify policy IN4 and make it effective;
- Include changes to sustainable new water resources, protection of water quality, flood risk, SuDS, land stability and land contamination (policies IN2, EN8, EN9, EN6 and supporting text) in line with national policy;
- Clarify the approach towards design and safeguarding living conditions (policies SD3, DE1 and supporting text);
- Clarify the use of Supplementary Planning Documents (SPDs) to ensure conformity with the Local Plans regulations; and
- Clarify the role and scope of the monitoring provisions of the Plan.

Introduction

1. This report contains my assessment of the Swindon Borough Local Plan in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate (DTC), in recognition that there is no scope to remedy any failure in this regard. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework, or *the Framework*¹ (paragraph 182) makes clear that to be sound, a Local Plan should be positively prepared; justified; effective and consistent with national policy.
2. The starting point for the Examination is the assumption that the local authority has submitted what it considers to be a sound plan. The basis for my Examination is the submitted draft plan (June 2013) which is the same as the document published for consultation in December 2012 incorporating the Council's proposed minor modifications.
3. In July 2103 I wrote to the Council, outlining several soundness concerns, involving DTC; population projections; housing market area (HMA); affordable housing (AH); gypsy and traveller accommodation; sustainability appraisal (SA); water infrastructure; economic growth; infrastructure provision and viability; rapid transit; use of SPDs; and monitoring.
4. Following a series of Council papers written in response to these concerns and an Exploratory Meeting held on 13 November 2013, I wrote to the Council on 18 November 2013, again requesting information on eight further matters (household projections; housing delivery; Strategic Housing Market Assessment (SHMA); gypsy and traveller sites; the relationship between economic growth and housing provision; key infrastructure schemes; rapid transit; and the Swindon Water Cycle Study). All of the Council's responses were sent to the Inspector by the end of December 2013, and the Inspector at this point was satisfied that the Plan could be examined. In February 2014, the Programme Officer wrote to all the parties to state that a Pre Hearing Meeting would be held on 11 March 2014 and that the Examination Hearings would start on 29 April 2014.
5. My report deals with the main modifications that are needed to make the Plan sound and legally compliant and they are identified in bold in the report **[MM]**. In accordance with section 20(7C) of the 2004 Act the Council requested that I should make any modifications needed to rectify matters that make the Plan unsound/not legally compliant and thus incapable of being adopted. These main modifications are set out in Appendix 1.
6. The Main Modifications that are necessary for soundness all relate to matters that were discussed at the Examination Hearings. Following

¹ DCLG National Planning Policy framework (*the Framework*); March 2012.

these discussions, the Council prepared a Schedule of Proposed Main Modifications² and carried out a Sustainability Appraisal³ together with a Habitats Regulations Assessment Addendum Note⁴ and a Diversity and Health Impact Assessment Addendum⁵, all of which are dated September 2014. The Schedule and the above documents have been subject to public consultation for six weeks from 18 September to 30 October 2014.

7. 58 parties responded in relation to the Main Modifications. I have taken account of the consultation responses in as far as they relate to the proposed Main Modifications in coming to my conclusions in this report and in this light I have made some amendments to the detailed wording of the Main Modifications and added consequential modifications where these are necessary for consistency or clarity. A minority of representations amount to a re-run of issues already fully considered at the Hearings, and my conclusions on these issues remain unaltered.
8. None of the further amendments significantly alters the content of the modifications as published for consultation or undermines the participatory processes and sustainability appraisal that has been undertaken. Where necessary I have referred to these additional amendments in the report. I also note that some of the representations have resulted in minor modifications proposed by the Council, which by their nature are outside the remit of my report.

Assessment of Duty to Co-operate (DTC)

9. Section s20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on them by section 33A of the 2004 Act in relation to the Plan's preparation.
10. It is clear, from the written evidence submitted to the Examination and from the comments made by the Council and from several other parties, that Swindon has been regularly engaging with its neighbouring authorities and a range of organisations and agencies on strategic cross-boundary matters for a number of years before any pressure was brought about by DTC to do so. There is also compelling evidence to demonstrate that this process has continued unabated since DTC came into force.
11. The Council's DTC statement⁶ and its Addendum⁷, in response to my pre-Hearing questions, provided ample information in support of its

² Swindon Borough Local Plan 2026: Schedule of Proposed Modifications to the Swindon Borough Local Plan 2026: Consultation Document; September 2014 [Examination Document MMA].

³ Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment Addendum; September 2014 [Examination Document MMB].

⁴ Habitats Regulations Assessment (HRA) Addendum Note; September 2014 [Examination Document MMC].

⁵ Diversity and Health Impact Assessment Addendum; September 2014 [Examination Document MMD].

⁶ Swindon Borough Local Plan Submission: Duty to Co-operate (DTC) Statement; June 2103 [Examination Document CD 21.8].

assertion that it had complied with DTC. Several important strands of evidence were submitted, which are summarised in the following paragraphs.

12. Firstly, the Council produced a comprehensive list of all the organisations, bodies and groups that had been involved in the DTC process, including the nature of the engagement, key dates and a summary of the outcomes reached. From this information, it is clear that the Council has engaged with all the bodies prescribed by the Regulations, as well as several others, including the Local Enterprise Partnership (LEP) and the Local Nature Partnership (LNP).
13. Secondly, a total of 26 Statements of Common Ground (SCG) between the Council and other agencies, bodies, adjacent authorities, local representative groups, landowners and developers further supports the collaborative working arrangements that the Council has entered into during the course of Plan preparation.
14. In response to my questioning on what key outcomes have resulted from joint working, the Council drew up a long list, which can be summarised as follows:
 - (i) Actively engaging with neighbouring authorities and prescribed bodies on progressing the strategic development allocations within the Plan and the timely delivery of the necessary infrastructure to progress their development, including future envisioning work;
 - (ii) Securing an agreed consistency of approach to development on the Borough boundaries, including the formation of a Joint Steering Group with Wiltshire Council, specifically related to delivering housing, employment and infrastructure provision to the west of Swindon and progressing neighbourhood plans (NPs) with cross-boundary implications;
 - (iii) Sharing information on the requirements and movements of gypsies, travellers and travelling showpeople; and
 - (iv) Working with the key organisations and agencies on transport studies and improving the strategic transport network; mitigating the impact of major schemes on the edge of the Borough, such as the New Eastern Villages (NEV); flood risk, water and waste issues, including close working on the Strategic Flood Risk Assessment; Habitats Regulations and developing green infrastructure networks; planning for health; and conservation.
15. Clearly, DTC does not guarantee agreement on every cross-boundary matter with every neighbouring authority, prescribed organisation or other body/group/landowner/developer/community group, and the Council was quick to acknowledge this. Criticism was also levelled at the Council, on behalf of the Western Vale villages, located to the east

⁷ Swindon Borough Local Plan Submission: DTC Addendum; August 2013 [Examination Document CD 25.5].

of Swindon, for failing to co-operate fully with Oxfordshire County Council (OCC), and in particular in relation to the impact that major new development proposals for the New Eastern Villages (NEV) would have on the A420 main road that connects Swindon with Oxford.

16. This criticism, however, was not made by OCC (who were absent at this stage in the Hearings) in relation to Swindon's DTC. Moreover, at a later Hearing session on infrastructure, the OCC representative stated, in response to one of my questions, that whilst OCC considered it was important to look at the Swindon-Oxford corridor as a whole, OCC "*will continue to work with Swindon*", confirming that joint working had already started between the two authorities.
17. At the transport Hearing session, the same OCC representative, in response to further questioning, stated: "*we have got sufficient comfort that the Plan is going in the right direction*" and "*we are prepared to support the Plan as it stands*". Support for the Plan from OCC is also contained in one of the SCGs submitted to the Examination, whilst the Council pointed out that OCC had been on the Steering Group, dating back to the time of the South West Regional Spatial Strategy (RSS), which has considered the expansion of Swindon's urban area to the east.
18. There were also comments from some house builders that more serious consideration should have been given to a combined Strategic Housing Market Assessment (SHMA), covering both Swindon and Wiltshire, which is covered in more detail below. However, the same house builders volunteered the point that Swindon had had a long history of working together with neighbouring authorities and groups.
19. Overall, there was strong support for the way the Council has met its DTC requirements, from Wiltshire Council and from sections of the development industry, including the Swindon Chamber of Commerce. On balance, taking into account all of the above considerations, I conclude that there is compelling evidence that the Council has undertaken its DTC in an effective manner and continues to do so.

Assessment of Soundness

Preamble

20. Swindon is a relatively prosperous, large town which has excellent road and rail links to London, Bristol and its extensive rural hinterland, extending to parts of Gloucestershire and Oxfordshire as well as Wiltshire. Its vast railway works defined the town from the mid nineteenth century for over a hundred years, but in the second half of the twentieth century it reinvented itself as an Expansion Town with a successful record of diversifying and attracting and retaining significant manufacturing, commercial office development, warehousing and distribution.
21. Although the early stages of the preparation of the Plan were carried out under the aegis of the South West Regional Spatial Strategy (RSS), this document never reached formal adoption. Subsequently,

the RSS has been revoked and no longer has any weight. It is not possible, nor desirable, however, to prepare a strategic document such as the Swindon Plan in isolation from its sub-regional and broader geographical context and Swindon have not attempted to do this. The Council's extensive networking, joint working and strategic collaboration with a wide range of neighbouring authorities, national, regional and sub-regional organisations, and many other commercial, environmental and community groups and organisations are summarised in my report under the section headed 'Duty to Cooperate', and elsewhere.

Main Issues

22. Taking account of all the representations, written evidence and the discussions that took place at the Examination Hearings, I have identified ten main issues upon which the soundness of the Plan depends.

Issue 1 – Does the Plan provide the most appropriate spatial strategy for the development of Swindon over the plan period?

The spatial context

23. Local Plans should be consistent with the principles and policies in *the Framework* (paragraph 151) and in its supporting document, the national Planning Practice Guidance (PPG). This includes the presumption in favour of sustainable development, which is taken on board in the Council's proposed change to sustainable development policy SD3 **[MM05]**, a modification which is justified and accords with the thrust of national policy. The PPG states that Local Plans set out a vision and a framework for the future development of the area⁸, which the Plan for Swindon does.
24. The Foreword to the Plan explains that this is a time of challenge and opportunity for Swindon Borough. It states that the town has a responsibility to deliver much-needed regeneration of the town centre but also plan for growth in a way that benefits existing and future residents of the Borough. The Foreword explains that the Plan aims to take a "*responsible and balanced approach to delivering growth that is achievable, deliverable and suitable. The message of the Council is "we are open for business"*".
25. The Plan articulates a clear spatial vision for Swindon. Its strategic objectives aim to secure high quality sustainable development both through meeting the town's need for housing, economic, community and transport needs, including delivering appropriate infrastructure, but also to meet the Borough's cultural and environmental needs.

⁸ PPG Reference ID: 12-002-20140306 – What is the role of a Local Plan?

Sustainability Appraisal and Habitats Regulation Assessment

26. The strategic direction of the submitted Plan has been informed by the Sustainability Appraisal (SA)⁹. The SA and the accompanying Habitats Regulation Assessment (HRA) were both undertaken in line with the relevant requirements of the EU Directives and Regulations¹⁰. Each version of the Plan, including the recent proposed Main Modifications, has been subject to SA, and three spatial strategy options were assessed as part of the SA process.
27. The preferred spatial option – 2 – provides the capacity to be able to deliver the growth required to meet Swindon's needs and potential. This option presents an appropriate balance between housing and jobs, and includes provision of the necessary infrastructure to support growth, both within the existing urban area and in the new planned extensions or New Communities. It states that there is a potential for negative impacts due to the high amount of greenfield development, which could be significant on biodiversity, habitat fragmentation, rural landscapes and coalescence with neighbouring communities. The SA, however, also highlighted that these impacts can be mitigated through the nature and form of the proposed development, and this fed into the selection of the preferred strategic option for the Plan.
28. Spatial options 1 and 3 did not have the same capacity to deliver the growth required for Swindon. Spatial option 1 would provide the least impacts on the environment through avoiding greenfield development and maximising the use of previously developed land (PDL), but there would be a number of significant downsides, including unacceptable cramming of development within the Swindon urban area, increased pressure on existing infrastructure, the transport network, air quality, existing urban green spaces, and with less scope for mitigation than in option 2. Spatial option 3 focuses on expansion of Swindon predominantly to the east, a close relative of the 'all the eggs in one basket' approach that was debated at the Hearings.
29. There was very little opposition to the SA either in the representations or at the Hearings. Supportive comments were made by a third party, to the effect that the SA audit goes back several decades, thus demonstrating that there is a wealth of information to inform the current debate on strategic options that has been focused through the SA. From the submitted evidence and the discussion at the Hearings, I am satisfied that the SA process, both in relation to scoping and subsequently in relation to the strategic options and reasonable alternatives for the Plan, has been undertaken in accordance with the requirements as set out in the legislation and the PPG¹¹.

⁹ Swindon Borough Council: *Sustainability Appraisal incorporating Strategic Environmental Assessment*; December 2012 [Examination Document CD20.31].

¹⁰ EU Directive 2001/42/EC [Examination Document CD1.53] and the Environmental Assessment of Plans and Programmes Regulations 2004 apply to the SA and EU Directive 92/43/EC [Examination Document CD1.54] applies to the HRA.

¹¹ PPG Ref. ID: 11-018-20140306 – How should the sustainability appraisal assess alternatives and likely significant effects?

Provision of homes and jobs

30. The overall provision of the number of homes and the amount of employment land and other uses stems from the consideration of up-to-date demographic and economic information. The strategic distribution of the main housing and employment areas has been heavily influenced by the SA.
31. Policy SD2 aims to deliver about, but not less than, 22,000 dwellings between 2011 and 2026, and 119.5ha of employment land (B-use class) over the same period. These aims are supported by the evidence base in the Council's latest version of Swindon's housing potential/trajectory¹², which is informed by the SHLAA. However, this has been further modified **[MM62]** following discussion at the Hearings, and this is supported as positively prepared and justified.

North Wessex Downs AONB

32. The southern quarter of the Borough lies within the scarp and vale landscape which is part of the North Wessex Downs Area of Outstanding Natural Beauty (AONB). Policy EN5 affirms the Council's commitment to protecting the character and appearance of the AONB and its setting. It has been amended **[MM24]** to ensure that development proposals must accord with *the Framework*, which states (paragraph 115) that great weight should be given to conserving landscape and scenic beauty in AONBs, which have the highest status of protection in relation to landscape and scenic beauty.

Strategic overview

33. Taking all these matters into consideration, I conclude that, subject to the Main Modifications, the spatial strategy of the Plan is sound and the most appropriate for Swindon. It is positively prepared, justified and accords with national policy.

Issue 2 – Is the Plan's approach to the Borough's housing provision, in terms of its overall requirement, its distribution – including the proposed New Communities – and delivery, sound? Are the needs for particular types of housing, including affordable housing, addressed satisfactorily?

34. The Plan aims to meet the objectively assessed housing need (OAHN) for the Swindon Housing Market Area (HMA), based on up-to-date population and household projections and a high economic growth scenario. The overall strategy is to meet the Borough's housing requirements through a combination of urban regeneration and mixed use urban extensions, which is largely a continuation of the existing successful economic model which has driven Swindon's growth over the last few decades.

¹² Swindon Borough Council Statement CS8: Council's Response to Inspector's Requests for Statements on Swindon's Housing Potential; May 2014 [Examination Document CD25.31].

(a) Housing requirement

Has the Housing Market Area (HMA) for Swindon been identified properly, and is it the appropriate starting point for considering Swindon's housing requirement?

35. The *Swindon Strategic Housing Market Assessment (SHMA)*¹³ sets out the justification for concluding that the Borough boundary best defines the HMA and is therefore the most appropriate 'building block' for assessing Swindon's housing requirements. This view also stems from the conclusions of a recent study by *Fordham Research*¹⁴. This study was commissioned by Wiltshire Council and highlighted Swindon's high level of self-containment, and its predominantly urban character, unlike the neighbouring HMAs and in particular the Wiltshire HMA. This approach is also consistent with that taken by Wiltshire and other neighbouring authorities, which are defined by local authority areas, and it accords with the PPG definition which is that: "*a housing market area is ... defined by household demand ... reflecting the key functional linkages between places where people live and work.*"¹⁵
36. In reality, the edges of HMAs are blurred, and the Council – together with Wiltshire Council – accept that areas of overlap do exist, and that some of the recent developments in Wiltshire, close to the Borough boundary, particularly to the west of the town, have contributed to Swindon's housing needs. The recent developments at Ridgeway and Moredon Bridge were cited as examples of this. I am satisfied that this is a reasonable approach which recognises the reality of Swindon's economic and social geography.
37. It was generally accepted that Swindon's housing characteristics were very different to those of the surrounding rural areas, and in particular the housing market in Swindon contains a significantly higher percentage of affordable properties and generally cheaper house prices for all types of residential property. From the evidence, it is clear that there is close cooperation between Swindon and Wiltshire, so that there is a shared understanding of the HMA overlap.
38. Some respondents argued for a redefinition of the Swindon HMA to approximate to its Travel to Work Area, or to comprise a zone along the M4 economic corridor. From an effectiveness point of view, however, there would also be problems securing important secondary data from areas which cut across local authority boundaries, and the HMA based on the Borough boundary enjoyed a high level of support among representations and at the Hearings.
39. I therefore consider that the Swindon Borough HMA is an appropriate geographical basis and starting point which provides the strategic housing context for the Plan.

¹³ Swindon Borough Council: *Swindon Strategic Housing Market Area Assessment (SHMA)* 2012: [Examination Document CD11.3].

¹⁴ Fordham Research: *Wiltshire Strategic Housing Market Assessment*; December 2011 [Examination Document CD11.14].

¹⁵ PPG Ref. ID: 2a-011-20140306: How can housing market areas be defined? [Examination Document CD1.65].

Would the Plan's housing target meet Swindon's full housing need?

40. *The Framework* requires that local planning authorities should use their full evidence base to ensure that their Local Plan meets the full objectively assessed housing needs (OAHN) for market and affordable housing in the housing market area, as far as is consistent with the policies set out in *the Framework* (paragraph 47[1]). Although the PPG states that establishing future need for housing is not an exact science¹⁶, the starting point has to be the household projections published by CLG¹⁷.
41. Swindon's population is forecast in the 2008 based ONS population projections to increase from 204,200 in 2011 to 243,700 in 2026, an increase of 39,500 inhabitants or 19.3% over the full period, or 1.3% pa.
42. The Plan's provision for a minimum of 22,000 new dwellings in the Swindon HMA between 2011 and 2026 is based on the most up-to-date CLG household projections available at the time of the Examination. However, the latest 2011-based projections need to be modified in the light of a number of considerations, which are set out in the following paragraphs. In view of the fact that there is less than 12 years to go before the end of the plan period (31 March 2026) the Plan's housing provision is set in the context of the Council's intention to undertake an immediate review of the Plan to ensure development provision looks to an appropriate long term end date **[MM03-04]**.
43. It was also suggested **[MM04]** during the modifications consultation that MM04 should refer to infrastructure, including water supply, as well as employment land provision. These modifications to policy SD2, including the reference to infrastructure and its supporting text, are justified and in accordance with national policy, and with the inclusion of this Main Modification I am satisfied that the plan period is not too short to effectively meet the needs of the Borough.
44. The use of a strategic review at an early stage in the life of a development plan has been successfully defended in a recent High Court Judgment in relation to the Dacorum Core Strategy¹⁸. Paragraph 51 of that judgment refers to the PPG, which states that: "*Local Plans may be found sound conditional upon a review in whole or in part within five years of the date of the adoption.*"¹⁹ I am therefore satisfied that the Council's commitment to a strategic review is sound.
45. In compliance with national policy, the Plan's housing provision is also based on a positive economic growth forecast (*the Framework* paragraph 19); and the need to boost significantly the supply of new housing with a 5% buffer introduced, to bring forward housing

¹⁶ PPG, paragraph ID: 2a-014-20140306 - What methodological approach should be used?

¹⁷ PPG, paragraph ID: 2a-015-20140306 - What is the starting point to establish the need for housing?

¹⁸ High Court Judgment between Grand Union Investments and Dacorum Borough Council; 12 June 2012.

¹⁹ PPG: Ref. ID: 12-008-20140306 – How often should a Local Plan be reviewed?

provision from later years to be implemented within the first 5 years of the plan period (*the Framework* paragraph 47 [2]).

46. Whilst there was no disagreement at the Hearings about the use of the CLG 2011-based household forecasts over the period to 2021, when these forecasts end, there was some debate as to the most appropriate way to plan for the remaining 5 years of the plan period. The arguments for reverting to the 2008-based forecasts for the final period of the Plan are that they were conceived at a more economically buoyant time, which aligns better with the increasingly positive perception of the current economic climate, rather than the recession-influenced (at least in part) 2011-based household projection; also, the 2008- based figures extend over the entire plan period.
47. On the other hand, there is evidence which casts doubt on the assumptions on the household representative rates (HRR) used in 2008, which significantly underestimated what is now known to have happened in and around the Swindon area since 2008. It was also pointed out that the 2011-based projections were based on demographic data over the period 2006-2011, where there were approximately three years of boom and two of recession, so that the overall data is considered to be a reasonable basis for planning for until the end of the plan period.
48. In view of the importance of understanding household projections as a principal component of established housing need, I formally requested the Council to undertake further work to 'roll forward' the 2011-based projections from 2021 to 2026. The Council responded by producing three sets of calculations²⁰. These can be briefly summarised as:
 - (i) The Council's December 2013 Assessment (Statement CS1): Applying the incremental difference (2020-2021) for the years 2021-2026, which results in an additional 19,765 households over the plan period, i.e. the equivalent to 20,385 dwellings (assuming a 3% allowance for vacant properties and second homes);
 - (ii) Alternative Method 1: Equalising the proportion of the projections across the whole plan period, resulting in a total change in households of 20,310, i.e. the equivalent of 20,919 dwellings.
 - (iii) Alternative Method 2: Applying the 2008-based HRR, notwithstanding the point raised that such an approach would be unrealistic as it would be based on a sudden change in HRR, a point which is supported by the Council and me. This results in a total change in households of 20,838, i.e. the equivalent of 21,463 dwellings.

²⁰ Swindon Borough Local Plan: Council's Response to Inspector's Request MF2: 2011-Based Household Projections; May 2014 [Examination Document CD 25.31].

49. It can be seen that the dwelling requirement set out in the Plan is in excess of all three methodologies and I am therefore satisfied that the OAHN for Swindon over the plan period is based on up-to-date household projections and is therefore positively prepared and justified. Moreover, the Council pointed out that the 2008-based household projections predict an increase in households in Swindon Borough of 26,000 for the 20 year period 2006-2026 (equivalent to 26,780 dwellings). Allowing for completions during 2006-2011 of 6,852, the equivalent figure proposed in the submitted Plan is 28,852, again comfortably in excess of the 2008-based household projections.
50. The Council has also clarified its position in relation to under-provision and the 'buffer', as required in *the Framework* (paragraph 47[2]). Over the period 2001-2011, the net completions numbered 13,040, in relation to the adopted Local Plan target of 11,500 dwellings. Although the years since 2008/09 recorded lower completions figures than the average annual requirement, this is not surprising given the economic situation for much of this time. I therefore consider that there has not been a persistent record of under-delivery of housing, in which case the above-mentioned buffer should be set at 5%, moved forward from later in the plan period. The Council has submitted evidence to show how the 5% has been moved forward, together with an updated housing trajectory, which is proposed to be included in the adopted Plan **[MM 62]**. This is supported on the grounds of the Plan being positively prepared.
51. Turning to forecast economic growth and hence jobs, Swindon has a strong track record of attracting economic development. As part of the preparation of the submitted Plan, the Council commissioned *Regeneris*, independent consultants, to provide alternative scenarios for the size and strength of the Swindon economy and its prospects for growth over 14 economic sectors over the plan period²¹. This work produced a base scenario of 10,400 net additional jobs over the period 2011-2026, based on the economic outlook in 2012, and this was broadly in line with the *Cambridge Econometrics* forecasts which the Council also used.
52. However, *Regeneris* advised: "*Despite UK economic conditions remaining difficult, Swindon could become stronger after 2016-17*". A higher growth scenario was postulated which suggested that, alongside growth in the services sectors, there was potential in the Borough for significant net new employment in logistics and distribution. In this scenario, employment growth in Swindon would generate 19,600 new jobs over the period 2011-2026.
53. The high level scenario was considered to be aspirational but achievable, and has since been seen to be in line with improving economic conditions and national economic forecasts. It was also evident at the Hearings that the *Regeneris* forecasts were seen to be realistic for Swindon by the business community, including the Swindon Chamber of Commerce and the LEP. Taking the high level

²¹ Swindon Borough Local Plan: Economic Testing of Swindon's Core Strategy, by *Regeneris*; 2012 [Examination Document CD 6.2].

figure and increasing the level of self-containment from 84.3% calculated by Cambridge Econometrics in 2009 to 94% by 2026 would limit the impact of this economic growth on housing markets outside Swindon, and net commuting, although of course overall actual commuting flows (both into and out of Swindon) may not decrease. On this basis, the Council calculates that the dwelling requirement to 2026 would be 21,322, again somewhat below the level provided for in the Plan.

54. I therefore consider that, subject to the recommended Main Modifications, Swindon's the housing requirement figure set out in the Plan would fully meet the need identified over the plan period.

(b) Housing distribution and delivery

Is the Plan's distribution of overall housing development justified?

55. The spatial strategy of the Plan focuses on a balance between, on the one hand, pursuing urban concentration through maximising urban regeneration and development on PDL, together with planning for a major urban extension to the east of Swindon and a number of strategic mixed use allocations around the periphery of the town. Elsewhere, rural development is focused in the primary settlements with limited development in the other villages. Table 1 in policy SD2 sets out the level and distribution of growth for both housing and employment floorspace.
56. The urban focus in the Plan accounts for about 4,500 dwellings; the major strategic allocation to the east (the New Eastern Villages or NEV) is proposed for 8,000 dwellings, whilst other strategic allocations have been allocated at Wichelstowe (4,064 dwellings); Commonhead (890 dwellings); Tadpole Farm (1,695 dwellings); and Kingsdown (1,650 dwellings). Housing sites were also considered within Wiltshire, but it was concluded that they were not necessary. Both Swindon and Wiltshire Councils agree that the two Wiltshire sites very close to the Borough boundary with recent planning consents (at Moredon Bridge and Ridgeway Farm) which together yield 900 dwellings will meet housing need in Swindon.
57. This strategy, which is clearly set out in the Plan, was considered against reasonable alternatives (considered in more detail in Issue 1) and is justified. Several of the representatives of the house building industry supported the overall strategy, although some expressed the view that the Plan lacks the necessary detail that is appropriate for inclusion in a local plan, and relies on non-local plan documents for the required detail. In relation to the NEV, some of the developers requested more clarity on matters such as the proposed development islands.
58. South Marston PC supported the indicative levels of housing in the NEV, including the concept of separate but well-connected communities, but was of the view that the current limit for the village extension of 500 dwellings was reasonable and should not be

exceeded. Wiltshire considered that the housing strategy complemented its own.

59. Concerns were expressed that the villages, and especially Wroughton, were missing out on their 'fair share' of new development, when their population as a proportion of the total population of Swindon was taken into consideration. However, pressure to increase the rate of house building was resisted by local residents and parish council (PC) representatives at the Hearings and in representations. Wroughton is located in close proximity to both the town of Swindon and the proposed new community of Wichelstowe, and I am not persuaded of the need to exceed the 150 dwellings allocated for the village in the Plan. Moreover, Wroughton and Highworth are the subject of Neighbourhood Plans (NPs), where the local communities could decide to increase the amount of new housing in these settlements.
60. On balance, I consider that none of the above considerations leads me to find that the overall distribution of housing in the Plan is unsound.

Is the overall level of housing provision deliverable, especially in relation to viability?

61. The housing target in the Plan, for approximately 22,000 dwellings over the plan period, is ambitious. A number of factors, however, point to the likelihood of satisfactory delivery of this total by 2026. Firstly, the viability evidence base, both for the Plan as a whole²², and for both the NEV²³ and Kingsdown²⁴ are positive, although the independent consultants' recommendations have led the Council to propose a nil CIL charge for residential development in the New Communities and there will need to be some flexibility. The Council's view is that the bulk of the supporting infrastructure can continue to be achieved in the context of compliance with the CIL Regulation 122 tests. This view was of course tested later at the CIL Examination, following the Local Plan Examination.
62. The Council has also submitted evidence that it has identified a supply of deliverable sites to provide a 5 year supply of housing land against the targets in the Plan²⁵, with an additional 5% buffer moved from later in the plan period. This is supported by the SHLAA and several of the house builders, and I have no reason to come to a different conclusion.
63. Secondly, the economic outlook is generally considered to be improving. As the economy improves, the momentum towards delivering the regeneration of central Swindon, including the provision of new housing, will increase. This appears to be happening already,

²² GVA: CIL Development Viability Study for Swindon Borough Council; June 2012 [Examination Document CD 4.1].

²³ GVA: NEV – Strategic Viability Testing; November 2013 [Examination Document CD 9.7].

²⁴ GVA: Kingsdown – Strategic Viability Testing; November 2013 [Examination Document CD 9.16].

²⁵ Swindon Borough Council Statement CS2: Deliverable and Developable Housing Potential; 20 December 2013 [Examination Document 25.15] and SBC Statement on Issue 6: Deliverability of Housing, paragraph 6.1.5.

much of it promoted by the Council's arm's length company, *Forward Swindon Limited*, which was represented by participants in several of the Hearing sessions.

64. Thirdly, several SCGs have been signed by the Council and a number of housing developers and infrastructure providers, indicating that the strategic housing allocations enjoy full stakeholder involvement and commitment.
65. Fourthly, although the relatively short time horizon of the Plan could be viewed as a source of uncertainty, the Council is intending to undertake an early and urgent review of the Plan, so this should not count against investor confidence.
66. Concern was expressed over the speed of delivery of major housing sites, and my attention was drawn in a written representation to the findings of research undertaken by the Hourigan Connolly SUE Report²⁶, which asserts that the scale and nature of such schemes means that they are more susceptible to delay, thus risking the Plan's deliverability within the plan period.
67. The Council's response was to robustly challenge the above-mentioned report; a typical quote was: "*Swindon does large scale delivery and does it well.*" This view was echoed in the Hearings by several representatives of the house building industry, who supported the proposed delivery rates in the Plan. There was no robust defence of the SUE Report at the hearings, whilst a number of successful examples of large scale development schemes elsewhere in the country were cited, schemes which are coming on-stream satisfactorily, e.g. Cranbrook, near Exeter. In view of these considerations and the fact that the NEV will be implemented by several developers, I conclude on this matter that the evidence strongly points to the likelihood that the overall housing provision in the Plan is deliverable within the plan period.

Are there reasonable prospects that an appropriate range of housing by size and type will be delivered through the implementation of the Plan?

68. Policy HA1 provides the primary policy steer for the size and type of housing. The policy received a measure of support and no challenges. One of the developers at the Hearings stated: "*We have no reason to believe that an appropriate range of housing by size and type will not be delivered through the implementation of the Plan*". I therefore consider that there are reasonable prospects of an appropriate range of housing being delivered over the plan period to meet the requirements of existing and future residents, and that the Plan is effective in this regard.

²⁶ The Hourigan Connolly research is referred to in the Gladman Developments Ltd written representation in response to Issue 6 – Deliverability (paragraph 5).

(c) Other housing needs

Affordable housing

69. Policy HA2 sets the framework for delivering affordable housing (AH) in Swindon. It requires all developments of 15 homes or more or on sites larger than 0.5 ha to make 30% provision for AH. The policy is supported by a comprehensive data base and is based on a Strategic Housing Market Assessment (SHMA)²⁷ which uses a methodology which is consistent with DCLG guidance for undertaking SHMAs²⁸. The housing needs figure includes homeless households; those in temporary accommodation; overcrowded households; and other households on the Council's housing register and RSL transfer lists. The AH supply figures are provided by the Council's Housing Services, who were represented at the Hearings and who support the Plan. The Plan also follows the guidance in *the Framework* (paragraph 50), including the aim to plan for mixed and balanced communities.
70. The Council's strategy is to maximise its AH provision on the back of market housing completions, which are based on the positive economic and housing growth scenarios which are already referred to in this report. The proportion of AH in the overall housing provision of the Plan follows the recommendations of the Council's independent Viability Assessment²⁹, and ties in with recommendation 15 of the SHMA³⁰.
71. The Council's Statement in response to Issue 4.5 of the Examination Hearings identifies an annual average AH shortfall of 801 dwellings. However, the Plan would not be deliverable if it were to require higher proportions of AH across the board, and this would also have the effect of reducing the viability of a significant number of schemes and being counter-productive.
72. Policy HA2 also provides a commuted sum approach where on-site provision is not suitable, whilst the forthcoming CIL aims to allow the Council to adopt a proportionate approach for smaller housing schemes. Policy HA1 provides guidance on housing mix, types and density, giving a further steer to meet housing needs. The change to this policy to link it to the SHMA and the Swindon Housing Strategy **[MM14]** is justified and in line with national policy as well as providing an appropriate degree of flexibility to be effective.
73. The AH provision in the Plan, including the 30% provision for the larger sites, is largely supported by representations as proportionate and pragmatic; one respondent put the AH policy into focus by stating

²⁷ Swindon Strategic Housing Market Assessment (SHMA); 2012 [Examination Document CD 11.3].

²⁸ DCLG: Strategic Housing Market Assessments Practice Guidance; 2007 [Examination Document CD 1.38].

²⁹ GVA: Affordable Housing Viability Study for Swindon Borough Council; July 2012 [Examination Document CD 11.2].

³⁰ Swindon SHMA 2012 – Recommendation 15: Sufficient attention should be paid to the design of new housing to ensure it reflects the Council's ambition to become a '*destination of choice*' [Examination Document CD 11.3].

that whilst not suggesting that the full housing needs figure should be met, it does provide a stark indication of the level of affordable need that the Borough faces.

Gypsy and traveller accommodation

74. Policy HA8 sets out the Council's provision for gypsies, travellers and travelling show people pitches and sites. Following the concerns I expressed at the Exploratory Meeting, the Council prepared a Response Statement³¹, which confirmed its serious intent to prepare a Sites Allocations Development Plan Document (SADPD). The SADPD **is** programmed for Examination in October 2015, following public consultation.
75. In accordance with the national policy guidance in the Planning Policy for Traveller Sites (PPTS)³², the SADPD will identify a supply of deliverable sites sufficient to provide five years' worth of sites against locally set targets, in addition to a supply of longer term sites.
76. The Council has also published its Gypsy and Traveller Accommodation Needs Assessment (GTAA)³³ which estimates that 17 pitches will be required over the period to 2028, split into 5 year periods. The identification of the sites required in the GTAA will be allocated in the SADPD. In response to questions as to why these sites could not be included within the submitted Plan, the Council explained that the need for such sites in the Borough is comparatively small and as these sites are not strategic in their scale, it was considered inappropriate to allocate them in this Plan, which addresses strategic site allocations. The Council's suggested modification of policy HA8 and its supporting text **[MM16-17]** to refer to the GTAA requirement for pitches and to the SADPD as the appropriate delivery mechanism is considered to be justified and effective.

Specialist housing

77. The SHMA provides information on the housing needs of specific types of households in the Borough. Policy HA1 allows the flexibility to be responsive to specific housing needs. Student housing is not a big issue in the Borough; the proposed University Technical College in Swindon is geared to meet the needs of local, regional and national employers for technically skilled employees, and it is envisaged that many of these students already reside in the area and thus do not present significant pressures for student housing. The Plan sets out its approach to the subdivision of housing (including Houses in Multiple Occupation) in policy HA4.
78. Policy DE2 covers lifetime homes, and wheelchair accessible housing is covered in policy HA3. Little support for self-build housing came from

³¹ Council Statement CS4: Gypsy and Traveller Accommodation; 20 December 2013 [Examination Document CD 25.17].

³² DCLG: Planning policy for traveller sites; March 2012 [Examination Document CD 31.34].

³³ Swindon Borough Council: Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA); November 2013 [Examination Document CD 12.22].

the public consultation, but policy HA1 supports such proposals should the requirement emerge. Provision of housing for the elderly was debated at the Hearings; it was considered that policy HA1 in particular would be permissive, whilst the suggested modification **[MM15]** to the supportive text to highlight the needs of the ageing population is considered to be justified.

Housing policies relating to the countryside

79. Policies HA5 (rural exception sites); HA6 (agricultural workers' dwellings) and HA7 (conversion of buildings to residential use in the countryside) all prevent the development of inappropriate and unsustainably isolated residential uses in the countryside in a consistent and robust way. Policy HA5 also links with the aim of policy SD2 to promote sustainable, inclusive and mixed rural communities.

Issue 2- conclusion

80. Subject to the Main Modifications, the Plan's approach to its housing provision and distribution, closely linked to its strategy for economic growth, is positively prepared, justified, effective and in line with national policy, including the principles set out in *the Framework* (paragraphs 6-10) and the PPG. Its total housing provision and its policies towards AH, G&T and other specialist accommodation are justified. Housing distribution is focused on several New Communities as well as on an ambitious programme of urban regeneration. There is evidence, primarily through the SHLAA, that there is a reasonable prospect of adequate housing delivery throughout the plan period. The commitment to an early review will ensure that the longer term housing requirements of the Borough will be taken on board.

Issue 3 – Is the Plan's framework for the economy, including the provision of employment land, town centre regeneration, retailing and offices, appropriate to meet the needs of Swindon and its hinterland?

Employment growth expectations and future employment demand

81. The Plan reflects *An Economic Strategy for Swindon*³⁴, which is based on input from private and public sector stakeholders as well as from the Council and *Forward Swindon Limited*, the Council's arm's length regeneration and economic development company. The Council explained that the Plan responds positively to the Government's *Planning for Growth* agenda³⁵ and was tested through a number of employment growth scenarios over the plan period to 2026; these range from a base case of around 10,500 new jobs to a mid-range position of around 14,000 new jobs and a higher growth scenario of nearly 20,000 net new jobs.

³⁴ Swindon Borough Council and *Forward Swindon: An Economic Strategy for Swindon 2012-2026*; January 2013 [Examination Document CD 6.3].

³⁵ Minister of State for Decentralisation, Mr Greg Clark: *Planning for Growth*; 23 March 2011 [Examination Document CD 1.43].

82. The Council was able to point to a successful track record of attracting employment to Swindon, citing a Business Engagement Programme which involves both the Council and senior employers, with a current statistic of four private sector jobs to every public sector job in the Borough, which is the fourth highest ratio in the country. The Borough is a net importer of jobs and whilst it has one third of the combined population of Swindon and Wiltshire, it has 40% of the jobs.
83. Swindon's economic and employment growth is targeted to come from both existing and inward investment, which is reflected in policy EC1. This policy also promotes Swindon Central Area as the first preference for office development, as well as promoting key sectors of the Swindon economy, such as specialist manufacturing, financial services, distribution and logistics.
84. Although the distribution sector is land hungry, the Council explained that it was an important sector for Swindon, with an increasing skilled workforce requirement. The Plan seeks to be responsive to a variety of employment needs in the town as flexibly as possible. In response to a comment that the Plan was over-reliant on B1 uses (i.e. business, including offices), the Council explained that out of the 19,600 new jobs target, 45% were for non-B use, such as retail or D class uses (non-residential institutions; assembly and leisure), with a guideline of 50% of these needs being met on new land and 50% in existing premises.
85. Policy EC1 and the Plan in general are predicated on a high growth option of 19,600 additional jobs, which is supported by the Swindon and Wiltshire Local Enterprise Partnership (LEP) – a key partner in the Council's eyes – and by other members of the local business community who attended the Hearings. Comments from these respondents included: *"Swindon has embraced the Growth Agenda"; "the policy framework is based on reasonable growth expectations"; "there is good collaboration with Wiltshire"; and "the economic plan is sound"*.
86. Some respondents considered that there was a need for further flexibility in the supply of employment land, especially along the M4 corridor, without which opportunities for inward investment could be stifled. The quantum of employment land provision, as set out in policy SD2, is based on a high growth scenario, and the distribution of employment sites is wide ranging throughout the Borough, including land within easy access of the M4 junctions. Moreover, the qualities of employment sites, and their size and location, do not appear to have put the brakes on major inward investment in the past, and I am not persuaded that the employment land provision in the Plan will hold back economic development over the plan period.
87. Taking these factors together, I consider that the Plan's expectations for growth are justified and realistic and that no soundness changes to the Plan are required in this regard.

Existing employment areas

88. The Council considers that the existing main economic areas are vital to the on-going supply of employment opportunities and sustainable economic growth in the Borough. The Swindon Employment Land Review³⁶ identifies high quality employment areas, which benefit from good local and strategic access, high market attractiveness and lower vacancy levels. Only a relatively small proportion of its employment areas – just over 2% – was classified as poor, and the majority of sites were functioning well.
89. Criterion (b) of policy EC2 outlines a flexible basis for accommodating non-B class uses, whilst safeguarding employment sites for predominantly class B uses. The policy, in my view, is not overly restrictive in the control of the development or use of employment land.
90. In response to concerns that the sequential test in policy EC2 was too onerous a test, the Council's change to require an appraisal in relation to the criteria in the policy **[MM13]** is endorsed as justified and effective. The policy, subject to this change and a requirement for a genuine marketing exercise for commercial uses for at least six months prior to allowing change of use **[MM12]**, strikes a sound balance between safeguarding valuable employment sites and allowing the necessary flexibility to develop, having regard to a range of important factors.
91. Concern was also expressed that the proposed employment allocation at Highworth (policy SD2) is anomalous and should be deleted. Highworth has a relatively large population (around 8,000) and plays an almost exclusively dormitory role for Swindon. The provision in the Plan for employment land within the settlement to restore some balance and potentially reduce out-commuting seems to me to be a step in the right direction, whilst concerns regarding any impact on living conditions can be addressed via the Plan's development management policy DE1.

Major new employment land

92. In response to the question of whether the Plan should provide more clarification, including criteria for and spatial distribution of major new employment land provision, Table 2 specifies 'potential likely uses' for employment allocations carried forward from the existing Local Plan. This, however, is not intended to be prescriptive, and I consider that an appropriate balance has been struck with the recognition that the demand to accommodate needs not yet anticipated could be met to allow rapid response to changing circumstances.

Housing/employment balance

93. The balance between housing provision and the provision of land for employment is not a precise one, yet it is one of the most critical for

³⁶ Swindon Employment Land Review; 2007 [Examination Document DCD 6.1].

the Plan to address. The housing provision of the Plan has been predicated on firstly, a high economic growth scenario and secondly, the achievement of 94% self-containment of the residents in employment working within the Borough by the end of the plan period. The Council considers that both its ambitions for high economic growth and a high level of self-containment are realistic, in the light of the latest economic forecasts, whilst its self-containment has risen from 75% in 2001 to 86% in 2012³⁷, which makes its 94% target by 2026 attainable.

94. The above economic growth and self-containment scenarios point to a sustainable balance being achieved between housing and jobs. Clearly, if these scenarios are not achieved, it could lead to increased out-commuting to jobs elsewhere, or conversely, if fewer houses are completed in Swindon, this could lead to a rise in demand for housing outside the Borough in neighbouring authorities.
95. On the evidence before me, I consider that the housing/employment balance is justified and attainable, and therefore the Plan is sound in this respect. It is, however, a key consideration that will have to be included in the remit for the early review of the Plan, and needs to be closely monitored.

Retail provision

96. There was general agreement at the Hearing that Swindon town centre was under-performing in retail terms, and that it was experiencing 'leakage' to out-of-town shopping centres and to competing towns, such as Reading. Policy SC1 aims to claw back some of this lost trade, and it makes provision for at least 53,700 sq m of net comparison goods retail floorspace in the town centre Primary Shopping Area (the retail core). This figure is based on the 2009 RTZ Retail Capacity Update³⁸, which although revising the then town centre retail floorspace figures downwards in the light of the economic down turn at that time, nevertheless stated that there would be a growing demand for additional comparison goods floorspace in the town centre throughout the forecasting period to 2026.
97. The RTZ forecasts remain valid in my view, and the Swindon Central Area Action Plan (CAAP)³⁹, which was adopted in 2009, remains the focus for new retail-led development. A town centre Master Plan dated 2013⁴⁰, amplifies the CAAP and identifies a portfolio of key development sites, some of which are now being implemented or are programmed for implementation in the near future.
98. In terms of convenience retail floorspace, the RTZ study identifies capacity of between 13,000 and 14,200 sq m over the plan period, which is required to serve the growth areas of the Borough, and in

³⁷ NOMIS/ONS Job Density [Referred to in the Council's Statement to the Examination on Issue 12: Employment, paragraph 13.5.3].

³⁸ Swindon Borough Council and RTZ: Swindon Retail Capacity Update; 2009 [Examination Document CD 13.7].

³⁹ Swindon Central Area Action Plan (CAAP); 2009 [Examination Document CD 3.1].

⁴⁰ Swindon Town Centre Masterplan; 2013 [Examination Document CD 3.2].

particular the NEV where policy NC3 makes provision for 12,000 sq m (gross) retail floorspace. Smaller amounts of retail floorspace are also provided for Tadpole farm and Kingsdown (both 1,000 sq m).

Office provision

99. Policy SC1 makes provision for 90,000 sq m of B1 office space in the town centre over the period to 2026. This is based on regeneration evidence⁴¹, which sees offices as a key growth sector, with around 4,500 jobs created over the plan period. A number of serious schemes are being progressed towards implementation, together with cultural schemes and a new bus station. Most of this development is proposed for the Commercial Quarter, and it now has planning permission. The Council's plans are justified, with a strong likelihood of delivery.

Other centres

100. The Plan identifies a hierarchy of centres, which together with the town centre, aim to meet the needs of the Borough. Concern was expressed that the amount of retail and complementary use was too restrictive, e.g. in the NEV where the maximum of 12,000 sq m would be further restricted through the development of an anchor food store of 10,000 sq m (gross) and 1,000 sq m of other small-scale floor space to be distributed across the three NEV local centres and within the expanded South Marston, leaving very little flexibility. The Council's suggested change to policy NC3, to build in more flexibility **[MM44]**, is supported on the grounds of justification and deliverability (effectiveness).

The visitor economy

101. The visitor economy (tourism and leisure) is a key sector for Swindon. In addition to attractions in and around the town, such as STEAM and Cricklade Country Way, the town is a base for touring the Cotswolds. Several policies, including SC1, SD2, EC1 and EC2 address this sector and provide a sustainable planning framework for its management and development over the plan period.
102. There was some debate at the Hearings over the future of the canals, which were seen as an important potential contributor to tourism in the Borough. In particular, the effectiveness of policy EN11 was questioned; this policy safeguards the route of the Wilts and Berks Canal and the North Wilts Canal. A particular issue is the potential conflict between sections of the indicative route and regeneration schemes in the town centre. The issue is sharpened by the high cost of securing the canal through the town centre, which was put, in answer to one of my questions, at around £50 million, with no clearly identifiable funding source(s).

⁴¹ New Life for Swindon: Regeneration Framework (the New Swindon Company); 2004 [Examination Document CD 3.3].

103. The Council drew my attention to the SCG between the Council and the Wilts and Berks Canal Trust⁴², which agreed that the inclusion of policy EN11 enables the safeguarding of the Wilts and Berks and North Wilts Canals, with a view to their long-term re-establishment as navigable waterways. It was also agreed that, in relation to the NEV, when the detailed designs are produced, possible realignment options based on better topographic data, and a proposed modification of the text to provide further clarity on this **[MM48]** would be required. This is supported as a realistic way forward at the appropriate time.

Issue 3 - Conclusion

104. I conclude on the evidence before me that the Plan's provision for the economy, the provision of employment land, the town centre, retail and office development, the visitor economy and other economic sectors is, subject to the above modifications, positively prepared, justified, deliverable and in accordance with national policy.

Issue 4 – Is the infrastructure needed to accommodate the Plan's strategy positively prepared, justified and deliverable within the plan period?

Waste management

105. There is a Waste Site Allocations Local Plan⁴³, jointly prepared by Swindon Borough Council and Wiltshire Council and adopted in 2013, which identifies and safeguards waste management sites within the Plan area. I agree with the Council that it is not necessary to repeat that work through this Plan.
106. The Wiltshire and Swindon Waste Core Strategy⁴⁴ sets out the strategic planning policy framework for waste management over the plan period, and policy WCS6 provides further guidance on what development proposals have to demonstrate to ensure waste management is properly considered. Paragraph 1.14 in the Plan details what is included in the development plan for Swindon, including a reference to the Waste Core Strategy. The provisions within the adopted waste planning framework provide a sound basis for the management of construction and demolition waste.

Flood risk

107. Policy EN6 provides the framework for minimising flood risk following consultation with a range of stakeholders, including the EA. The SCG between the Council and the EA⁴⁵ confirms that the policy has been developed and supported by robust evidence documents, including a Strategic Flood Risk Assessment (SFRA) Level 1; that the Council's

⁴² Statement of Common Ground (SCG) between Swindon Borough Council and Wilts and Berks Canal Trust; April 2014.

⁴³ Wiltshire and Swindon Waste Site Allocations Local Plan; 2013 [Examination Document CD 19.6].

⁴⁴ Wiltshire and Swindon Waste Core Strategy; 2019 [Examination Document CD 19.1].

⁴⁵ Swindon Borough Local Plan 2026 Examination: Statement of Common Ground (SCG) between Swindon Borough Council and the Environment Agency (EA); April 2014.

evidence base meets the requirements for a Level 2 SFRA; and that a sequential FRA has been undertaken, all of which satisfied the requirements of the EA.

108. In terms of development delivery, policy EN6 (e) requires that developments will be expected to incorporate sustainable drainage systems (SuDS). Suggested changes to part (d), to ensure that development proposals must be in accordance with the Local Risk Flood Management Strategy (LFRMS) and an additional part (f) to ensure that SuDS should seek to enhance water quality and biodiversity in line with the water Framework Directive, and the supportive text **[MM25-26]** are supported as justified and effective. It was also suggested during the MMs consultation that MM25 should address locally significant flooding within neighbouring authorities **[MM25]**, and this is supported in the interests of the justification and effectiveness of the Plan.
109. Concerns were expressed, from Wanborough residents and others, over whether the proposed major development areas in the Plan would be subject to unacceptable flood risks, in view of the greater extremes of weather experienced in recent years, and whether policy EN6 is effective in relation to existing, as well as new development. Some respondents alleged that: "*Little thought is given to flood prevention*". My attention was drawn to the flooding of 50 dwellings at South Marston in 2007. Specific criteria for the heights of surface water drainage outflows were suggested for inclusion in the Plan.
110. The Council's independent consultants responded by explaining that the detailed modelling and flood mapping takes full account of the danger of flooding to all properties. No model, however, can ever predict flooding 100% of the time. But it was explained that the information is regularly updated with the best available information, including recorded incidents of flooding; moreover, the July 2007 flooding events were taken into account in the 2008 SFRA⁴⁶.
111. CPRE also criticised the policy as containing no positive steer to encourage developers to build houses which are designed for flood risk areas, however small the flood risk, and that policy EN6 should be amended to include such a requirement. Another concern raised was the effect of the proposed Southern Connector Road (SCR) on flood risk.
112. The Council in response to these points explained that developers steer away from high risk areas anyway, and that there was a danger of the policy being over-cumbersome; it came down to what was considered to be an appropriate level of detail. The Council's independent consultants confirmed this point and stated that policy EN6 already directs development away from areas of higher flood risk. Regarding the SCR, the Council explained that consideration of flood risk is an essential part of the initial assessment of a new road scheme, and the work on such a scheme is subject to EA approval.

⁴⁶ SFRA Level 1; 2008 [Examination Document CD 8.5].

113. I consider that policy EN6, as modified, and supported by the EA and the Council's independent consultants, is positively prepared; it is clear that considerable thought has been given to this difficult issue, and that the policy is justified and effective.

Infrastructure delivery

114. Policy IN1 and the Infrastructure Delivery Plan (IDP) aim to provide the necessary guidance to enable the successful implementation of the Plan. As the Council explained at the Hearings, the IDP is "*iterative and integral to the Plan*". In a real sense it is a living document, or a work in progress. During the course of the Examination, the IDP has undergone several versions⁴⁷; in particular the IDP addressed my concerns that it needed to be more focused on the prioritisation, phasing, costing of infrastructure, key development agencies and sources of finance⁴⁸. This information is critical, given the funding gaps that exist in several key areas.

115. Concerns were expressed in relation to a number of key aspects of infrastructure provision for Swindon over the plan period. In particular, several local residents and action groups considered that the funding details for water supply, waste water treatment and highways were either imprecise or revealed significant shortfalls in funding. CPRE commented that expressions in policy IN1, such as 'where appropriate' or 'within the context of viability', were tantamount to stating that delay was probable. There were other, more specific concerns relating to infrastructure details within the proposed New Communities and these are addressed under Issue 7 below.

116. On the other hand, consultants representing developers who are likely to be the most involved in Swindon over the plan period, came out in support of policy IN1 and the IDP, which they considered provided sufficient guidance for the implementation of the Plan. One consultant stated: "*There is substantial, compelling evidence of the successful implementation of the Plan within the context of the IDP*". This view aligns itself with the evidence provided by the Council in response to the Inspector's initial concerns, raised at the exploratory Meeting, as to whether there was enough detail to provide assurance over the delivery of approximately 22,000 dwellings over the plan period⁴⁹.

117. In relation to water supply, Thames Water and the EA considered that the demand for water within the Swindon area (referenced as the SWOX WRZ zone) up until the end of the plan period can be met by a combination of demand management measures and planned water resource management schemes, including additional waste water treatment. They indicated that their detailed studies, including the

⁴⁷ IDP versions during the Examination; CD 21.14 in June 2013; CD 25.9 in November 2013; and CD 4.7 in March 2014.

⁴⁸ Swindon Borough Council Statement CS6: Council's Response to Inspector's Request for Statement on Infrastructure Delivery; December 2013 [Examination Document CD 25.19].

⁴⁹ Swindon Borough Council Statement CS2: Council's Response to Inspector's Request for Statement on Deliverable and Developable Housing Potential; December 2013 [Examination Document CD 25.15].

conclusions of the Water Cycle Study⁵⁰ showed that the growth provided for in the Plan would not lead to a deterioration of Water Framework Directive classification for BOD⁵¹, ammonia or phosphate.

118. In response to my concerns expressed at the Hearings on affordability and deliverability of measures to ensure the availability of water for Swindon over the plan period, the Council's Statement⁵² explained that Thames Water predicted a shortage of water in the SWOX WRZ Zone post 2020. However, some transfer of water from nearby areas is considered by Thames Water and the EA to be achievable to enable a surplus of supply beyond the end of the plan period. These measures still require the approval of the Secretary of State, or further public scrutiny, but as the Council's Statement advises: *"Ultimately Thames Water will have to ensure supply of water resources is at least in line with future demand forecasts, taking into account environmental constraints"* (paragraph 9).

119. The SCGs between the Council and Thames Water⁵³ and with the EA⁵⁴ indicate support for policies NC1-NC5 inclusive. They also support policy IN2, which specifically deals with water supply and waste water, subject to modifications to refer to sustainable new water resources and the need to ensure that there should be no adverse impacts on sensitive ecosystems, particularly SSSIs and the River Kennet, and their supportive text **[MM19 & 20]**. These modifications are considered necessary for the Plan to be justified and effective. The SCGs are confident that the Plan can be delivered in relation to water supply and waste water treatment. Taking account of the above factors, I am satisfied that the appropriate level of water resources will be deliverable over the plan period, and that the Plan is therefore effective.

Critical infrastructure

120. The Council was also asked at the Exploratory Meeting which schemes were critical to the successful implementation of the Plan. The Council defined critical infrastructure as enabling infrastructure necessary to unlock planned development and deliver the Plan's overall sustainable strategy and strategic objectives, and the IDP sets out the priorities for Swindon. The Council also prepared an Infrastructure Priority List (IPL)⁵⁵ which focuses on the major schemes that are essential to enable and/or unlock development identified in the Plan. The IPL has informed Swindon's 'ask' of the Local Growth Fund, through the

⁵⁰ Swindon Water Cycle Study; 2014 [Examination Document CD 8.36].

⁵¹ BOD – biochemical oxygen demand – is the amount of dissolved oxygen needed by aerobic biological organisms in a body of water to break down organic material present in a given water sample a certain temperature over a specific time period.

⁵² Swindon Borough Council Statement- Response to Inspector's Request MF7 regarding Water Resources; May 2014 [Examination Document CD 25.67].

⁵³ Statement of Common Ground (SCG) between Swindon Borough Council and Thames Water Utilities Ltd; April 2014.

⁵⁴ Statement of Common Ground (SCG) between Swindon Borough Council and the Environment Agency (EA); April 2014.

⁵⁵ Swindon Borough Council: Infrastructure Priority List (IPL); November 2013 [Examination Document CD 25.9].

Swindon and Wiltshire LEP Strategic Economic Plan 2014. The IPL does this on a scheme-by-scheme basis and provides an appropriate level of focus for infrastructure spending. It also assists the Council in actively pursuing sources of external funding to plug funding gaps.

Deliverability of infrastructure

121. The Council's viability assessment work⁵⁶ demonstrates that as a whole, the development proposed in the Plan is deliverable. The Council has also produced further work to show that the proposals for each of the strategic sites are also viable. In line with the recommendations of the Harman Report⁵⁷, the Council has also been mindful of the cumulative impacts of infrastructure delivery, and has set a developer-friendly policy network to seek to unlock the barriers to deliver development.
122. I am therefore satisfied that there is Plan-wide viability to show that the proposals can be realistically delivered within the necessary supporting infrastructure over the plan period.

CIL

123. Whilst it is not part of the remit at this Examination to determine the soundness of the Community Infrastructure Levy (CIL), I am also satisfied from the submitted evidence and discussion at the Hearings that the Plan provided the necessary strategic guidance for the preparation of the CIL, and for Examination which took place in the autumn.

Issue 4 -Conclusion

124. I conclude on the evidence before me that the infrastructure needed to ensure the deliverability of the Plan is in place or can be achieved at the appropriate time within the plan period. In particular, policy IN1 provides a common thread to underpin all development proposals, and is amplified by policies relating to green infrastructure, biodiversity and flood risk; transport; AH; educational requirements; and social infrastructure.

Issue 5 – Is the capacity and quality of the existing and proposed transport network sufficient to accommodate the scale and distribution of growth planned for Swindon?

Overall approach to transport provision

125. Policy TR1 sets out the Council's approach to sustainable transport provision in the Borough, whilst policy TR2 provides a number of development management measures to achieve this approach. The explanatory text outlines Swindon's transport priorities, including a

⁵⁶ Swindon Borough Council: Report on the Implications of the Swindon Borough Council Local Plan 2026 for Development Viability in the Borough; 2013 [Examination Document CD 4.6].

⁵⁷ *Viability Testing for Local Plans: Advice for planning practitioners*: Local Housing Delivery Group, chaired by Sir John Harman (known as the Harman Report); June 2012.

rapid transport network; a new town centre bus exchange; a new orbital bus service; urban management and control systems; and targeted investment in several priority transport corridors. The Plan's approach therefore accords with paragraph 157 [1] of *the Framework*, which states that Local Plans should "*plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework*".

126. The Council's evidence showed that the transportation aspects of the Plan were underpinned by an extensive evidence base, including the Swindon Transport Strategy⁵⁸. More detailed assessments were undertaken for the NEV strategic allocation and impacts on the A419, A420 to the east of White Hart Junction and junctions 15 and 16 on the M4. Other work included modelling in relation to Kingsdown and the NEV SCR Study⁵⁹.

127. This approach was supported by several respondents, including some of those with major development interests in the area, one of which stated: "*there is a clear and multi-faceted framework in place, including the IDP and LTP3*".

A420 corridor

128. Concerns were expressed, however, from a number of quarters. Oxfordshire County Council (OCC) expressed particular concern over the impact of the Plan, and in particular the NEV, on the A420 Swindon – Oxford main road. This road corridor, it was argued, should be the subject of a joint study, with an agreed programme of appropriate mitigation measures and a more comprehensive public transport strategy. A major factor in this is that major housing developments on the edge of Oxfordshire will attract commuters to employment sites in Oxford and Science Vale, particularly as housing costs are typically lower in Swindon than in Oxfordshire.

129. Vale of White Horse District Council expressed similar concerns to OCC, bearing in mind that a significant number of recent housing developments in its district had also impacted on the A420. However, at the Hearings, OCC made it clear that it was not objecting to the Plan, and was willing to work together with the Council to put the appropriate mitigation measures in place.

130. Some of these concerns were also raised by the Western Vale Village Consortium, who questioned the commitment of the Council to prepare a strategy for the A420, especially in the short term, alleging that the traffic problems on the road and at White Hart Junction (A419/A420) are severe now. Other groups, such as South Marston PC, took a more conciliatory line, stating that its partnership with the Council had resulted in a clearer understanding of the traffic issues along the A420 and to the east of the A419, and that the traffic modelling by the Council's consultants adequately represented the

⁵⁸ Swindon Transport Strategy; 2009 [Examination Document CD 15.1].

⁵⁹ New Eastern Villages (NEV) Southern Connector Road (SCR) Feasibility Study; 2014 [Examination Document CD 15.13].

future impact of the proposed developments in the NEV and South Marston/ Rowborough. They also, however, expressed concern at the ability of the A420 to accommodate all the increased pressures likely to arise as a result of the major expansion proposed to the east of Swindon.

131. Whilst I note the concerns of a number of individuals, communities and authorities who are seeking a greater level of detail and certainty in relation to key transport schemes, the IDP/IPL provide what I consider is an appropriate level of detail, a view shared by most of the major developers who contributed to the debate at the Hearings.

Improvements to the strategic highway network

132. CPRE opposed the targeted investment to improve key junctions (policy TR1 [6]), arguing that in the case of Junction 16 on the M4, improvements would not be sound because the roads leading off the junction are not wide enough to take the increase in traffic, and that the proposed layout of the junction is not designed according to the standards in the Government's Design Manual for Roads and Bridges (DMRB). CPRE also criticised policies TR1 and TR2 for not mentioning rail, which they argued would in many cases provide a better strategic solution than road-based measures. Whilst rail transport should not be underestimated, it is clear to me that the principal sustainable transport focus in Swindon is buses, including some quite ambitious schemes that are addressed below.
133. Several more detailed transport concerns relating to the proposed New Communities were also made, and these are addressed under Issue 7 below.
134. The SCG between the Highways Agency (HA) and the Council⁶⁰ demonstrates that there has been continuous working between the two signatories throughout the preparation of the Plan. The CSG also confirms HA agreement to the strategic highway improvement proposed in the Plan. The SCG is silent on improvements to Junction 16 on the M4, which I take as support for the Plan. The only changes sought by the HA are to provide more detail on the White Hart Junction in terms of its deliverability, and access to Tadpole Farm **[MM 47 & 52]**. I consider that these amendments are all that is required to ensure the effectiveness of the Plan.

Rapid transit

135. Policies TR1 and TR2 promote sustainable travel choices, including public transport and the proposed rapid transit network. Several respondents, including OCC, questioned the soundness of the proposed rapid transit network, in terms of lack of detail as to exactly what is envisaged, what it would cost and how it would be delivered.

⁶⁰ Statement of Common Ground (SCG) between Swindon Borough Council and the Highways Agency (HA); April-May 2014.

136. In response to my concerns over the details, costs and deliverability of the proposed rapid transit scheme, which were raised at the Exploratory Meeting, the Council issued a Statement⁶¹, which showed in greater detail the routes and capital costs, together with a further technical report by independent consultants which assessed the network in relation to the NEV⁶². This technical report also clarified that rapid transit within Swindon would take the form of a highly prioritised conventionally operated bus system, running alongside the existing conventional network. The change to the definition, from 'rapid transit' to 'express bus network' **[MM43 & MM63]** is justified and clarifies an important element in the Plan. It is supported by the HA, showing that it accords with national policy. The IDP, together with the above modification, contains the appropriate level of detail to make the Plan effective.

Issue 5 -Conclusion

137. I therefore conclude that the existing and proposed transport network, subject to the proposed changes to the Plan as set out above, is sufficient to accommodate the scale and distribution of growth planned for in Swindon in a sustainable manner.

Issue 6 – Does the Plan provide a clear and integrated framework for conserving, managing and enhancing the Borough's Green Infrastructure (GI), biodiversity and other environmental assets? Does it provide a sustainable framework for responding to climate change, renewable energy, biodiversity and other environmental assets?

Green Infrastructure Network

138. Swindon's Green Infrastructure (GI) is diverse, containing a range of biodiversity areas including ancient woodland, nine SSSIs, 91 local designated wildlife sites and five Local Nature Reserves. It also contains parts of the North Wessex Downs AONB and the Upper Thames Vale. It lies at the heart of the Great Western Community Forest and has an extensive network of open spaces, many of them linked through the rights of way network.

139. Policy EN1 aims to protect and enhance the GI network, whilst Appendix 5 identifies the principal GI assets, which accord with the GI definition in *the Framework* (Glossary, page 52). Changes to the policy to refer firstly to the GI Strategy, secondly to the impact on irreplaceable habitats and thirdly to the need for GI to integrate with green corridors as shown on the Policies Map **[MM22]**, will clarify the policy and make it effective. They are also considered to be justified.

⁶¹ Swindon Borough Council Statement CS7: Council's Response to Inspector's Request for Statement on Rapid Transit; December 2013 [Examination Document CD 25.20].

⁶² CH2MHILL Technical Report: Swindon Rapid Transit Proposals – New Eastern Villages, prepared for Swindon Borough Council; March 2014 [Examination Document CD 15.12].

The policy, as amended, is supported by the Local Nature Partnership (LNP)⁶³ and other environmental bodies, including NE and the EA.

140. In addition to the changes in policy EN1, the amendment of the supporting text to include reference to a GI Concept Map **[MM23]** is endorsed in the interests of the effectiveness of the Plan, bearing in mind the importance of connectivity to the success of the GI network and strategy.

Renewable energy and climate change

141. Policy IN4 sets the parameters for low carbon and renewable energy. The policy is ambitious, proactive and sustainable, and supportive of district energy networks. Some respondents cautioned against the policy being unduly onerous. However, the policy as crafted seeks to encourage rather than to require, and as such I am satisfied that it is sufficiently flexible to be effective without stifling economic development. As one of the respondents pointed out, the success of the policy can be measured through two of the monitoring indicators in Appendix 6 – renewable energy capacity installed (by type) and per capita reduction in CO2 emissions within the Borough. The change in the policy, however, to include a target **[MM21]** is endorsed on the grounds of the effectiveness of the Plan.
142. The policy's stance on supporting wind turbines, whilst providing a steer to ensure that there shall be no unacceptably adverse impact on the built or natural heritage, occupiers' living conditions or areas of tourism or recreational importance, seems to me to be a balanced and justified position, with an eye to contributing towards mitigating the effects of climate change.

Air and water pollution

143. The Council has included additional text to ensure the Plan is in accordance with the Habitats Regulations. A new supporting paragraph to policy TR1 is added to ensure that there is a strong emphasis on sustainable transport solutions so that any impact on Special Area of Conservation sites will not be significant **[MM18]**, and new text is inserted to protect water resource **[MM20]**. These are justified and in accordance with national policy.

Other environmental policies

144. The Plan contains a raft of other environmental policies. Policy EN2 sets the framework for furthering the aims of the Great Western Community Forest and policy EN3 furthers open space provision and enhancement; these policies were generally supported and are justified. Policy EN4 seeks to require all development to protect and enhance biodiversity and geodiversity. Policy EN5 seeks to safeguard landscape character and historic landscapes, and is amended **[MM24]**

⁶³ Memorandum of Understanding between Link2Nature and Swindon Borough Council; October 2013 [Examination Document CD 25.7].

to refer to the relevant paragraphs of *the Framework* (115 and 116) in relation to impact on the AONB.

145. The Council has suggested changes to policies EN7, EN8 and EN9, which address pollution/ potentially unstable land and contaminated land respectively, by underlining the developer's responsibilities **[MM27-29]** and these are supported in the interests of the effectiveness of the Plan. Policy EN10 seeks to sustain and enhance Swindon's historic environment. The changes to the policy and supporting text to refer to Heritage Assets **[MM30]** are in line with national policy. The changes also refer to the importance of securing an appropriate balance, as outlined in *the Framework* (paragraphs 133 and 134).
146. Policy EN11 on heritage transport seeks to safeguard the routes of the Wilts and Berks Canal and the North Wilts Canal, and to restore them as navigable waterways. The policy has the support of the Wilts & Berks Canal Trust through a SCG⁶⁴. Concern was expressed by the EA that implementation should not be at the expense of harm to ecology, flood risk, water resource or water quality and a change to the policy **[MM32]** to reflect this concern is endorsed on the grounds of being justified and in accordance with national policy. The policy has also been modified **[MM31]** to protect the route of the Swindon and Cricklade Railway from its present terminus at Taw Hill Halt South to a new terminus in the Mouldon Hill Country Park.

Issue 6-Conclusion

147. I therefore conclude that on the evidence before me and subject to the proposed modifications, that the Plan provides a sound framework for conserving, managing and enhancing the Borough's GI and enabling a sound basis for addressing climate change, renewable energy, biodiversity and other environmental challenges during the plan period.

Issue 7 – Are the proposals for the New Communities positively prepared, justified and deliverable?

148. Around three quarters of Swindon's new homes over the plan period are to be provided in five major mixed use allocations, all located on the fringes of the urban area. They are:
- Wichelstowe (4,500 homes, some of which have already been completed) to the south-west of the town centre, alongside the M4 motorway, close to Junction 16;
 - Tadpole Farm (1,695 dwellings) to the north;
 - Kingsdown (1,650 dwellings) to the north-east, just off the A419;

⁶⁴ Statement of Common Ground (SCG) between Swindon Borough Council and the Wilts & Berks Canal Trust; April 2014.

- New Eastern Villages (NEV) (8,000 dwellings) to the east, just off the A419, including 1,500 dwellings at Rowborough to the north of the A420 and 500 at South Marston, also to the north of the A420; and
- Commonhead (890 dwellings) to the south-east, near Junction 15 of the M4.

149. Several of these major allocations already have outline planning permission, either for part or for the entire allocation. In response to my questioning, the Council and some business sector representatives argued for their retention in the Plan for several reasons; firstly, the plan period exceeds the length of the planning permissions; secondly, it is important that the sustainable development principles in policies NC1 – NC5 should apply throughout the plan period to prevent any watering down or dilution of these principles with subsequent planning applications; and thirdly, to provide a sustainable policy for the determination of reserved matters applications. I accept the force of these arguments in the interests of securing the quality as well as the quantity of development in these key development allocations in the Plan.

150. The submitted Plan delegates a considerable amount of detail in relation to these major allocations to supplementary planning documents (SPDs). This is unsound for two reasons. Firstly, the Regulations⁶⁵ state that the allocation of sites and policies for their development cannot be devolved from a Local Plan to a SPD, and it is clear that policies such as for development management, site allocations or infrastructure contributions cannot be 'hidden' in SPDs. The modifications to delete inappropriate references to SPDs or to ensure that the use of SPDs falls within the requirements of the Regulations **[MM01; 06-09; 49; 59 & 61]** are necessary to accord with national policy.

151. Secondly, *the Framework* (paragraph 157[4] and [5]) states that Local Plans should indicate broad locations for strategic development on a key diagram, whilst promoting detail on form, scale, access and quantum where appropriate. The PPG⁶⁶ also states that the Local Plan should make clear what is intended to happen in the area over the life of the plan, where and when this will occur and how it will be delivered.

152. In response to these concerns, the Council has introduced changes to policies NC1 – NC5 to indicate indicative phasing, and where appropriate, densities and broad areas of development **[MM 33-46; 49-51 & 53-62]**. It was suggested during the MMs consultation that in MM49, the reference to dialogue should include neighbouring authorities, and this is supported in the interests of the justification and effectiveness of the Plan **[MM49]**.

⁶⁵ The Town and Country Planning (Local Planning) (England) Regulations 2012.

⁶⁶ PPG Ref. ID: 12-003-20140306 [Examination Document CD1.65]

153. These modifications ensure that the Plan provides the 'what', 'where' and 'when' of development, as required by *the Framework* and PPG. These modifications are endorsed on the grounds of positive preparation, justification, effectiveness and to accord with national policy.

Wichelstowe

154. Policy NC1 provides for a major mixed use development at Wichelstowe, including residential areas, employment land, four local centres, three primary schools and one secondary school, other community facilities, extensive landscaping and part of the River Ray green corridor. It also includes a policy suite to address renewable energy, sustainable transport links, environmental protection and protection of the principle of non-coalescence between settlements. Implementation of the new community at Wichelstowe is already underway; outline planning permission exists for 4,500 dwellings, of which 800 have reserved matters permission and around 600 are now occupied. The provision of strategic infrastructure has already commenced, and a new superstore has already started trading.
155. Concerns were expressed over the changes to the distributor road network, which is now routed through the centre of the new community, with consequent safety implications. Other concerns related to the removal of the express bus routes, the 'isolated' location of the superstore and whether important improvements to Junction 16 of the M4 are now deliverable.
156. The Council accepted that there had been substantial changes to the internal road network, but these had been designed along the principles of the Government's *Manual for Streets* (MfS). As a result it was no longer seen as appropriate to take traffic around the edge of the development and more sustainable to route the main distributor road through the development with a series of signalised pedestrian crossings and reduced speed limits. The Council's journey time analysis demonstrated that potential for 'rat running' was reduced by the traffic calming and route configuration.
157. Although the rapid transit scheme has been removed, a dedicated bus route is still proposed with a 'bus gate' to be implemented to improve access. The implementation of the improvement scheme for Junction 16 is subject to a planning condition which requires the necessary works to be completed by the occupation of the 1,100th house at Wichelstowe.
158. I therefore conclude that, subject to the modifications proposed by the Council, policy NC1, for a proposed major mixed use allocation at the new community of Wichelstowe, is positively planned, justified, deliverable within the plan period and accords with national policy.

Tadpole Farm

159. Policy NC4 provides for a major mixed use development at Tadpole Farm, including residential areas, employment land, a mixed use local

centre, a primary school and contributions towards an off-site secondary school, other community facilities, extensive landscaping and connectivity to the River Ray green corridor, and a policy suite to address renewable energy, sustainable transport links and environmental protection. Outline planning permission exists for a mixed use development including 1,695 dwellings, and the eastern access to the development has commenced.

160. Concerns were expressed over the cumulative impact of additional traffic from Tadpole Farm and recently commenced housing schemes just over the Borough boundary in Wiltshire on the low capacity road network serving Tadpole Farm, including the rural village of Blunsdon St Andrew. There were also concerns as to whether the rapid transit scheme is deliverable early on the life of the development, when it will be needed.
161. The Council explained that it was assessing the likely traffic impacts jointly with Wiltshire Council. S106 contributions towards the provision of an express bus service from the development at Tadpole Farm will commence at the occupation of the 735th house. The Council was therefore still committed to express bus access, albeit on a lower budget than hitherto.
162. The policy has been modified [**MM51**] to identify the appropriate housing density of the new community of Tadpole Farm at 35 dph. This will increase the efficiency of land use without resulting in environmental harm in accordance with the core planning principles in *the Framework* (paragraph 17[8]).

Kingsdown

163. Policy NC5 provides for a major mixed use development at Kingsdown, including residential areas, a mixed use local centre, a primary school and contributions towards an off-site secondary school, other community facilities, extensive landscaping, and a policy suite to address renewable energy, sustainable transport links and environmental protection.
164. The Council explained that the Kingsdown allocation was needed to ensure that there was sufficient capacity from the five major allocations to ensure security of housing supply over the plan period and to ensure that the 5 year housing supply, which is required in *the Framework*, can be achieved. The SCG between the Council and the two scheme developers⁶⁷, working as a partnership, demonstrates the commitment to develop Kingsdown within the plan period.
165. A widely felt concern expressed by the existing local communities around Kingsdown is that the Council had not consulted widely enough and introduced the proposed allocation late in the day. Concerns were expressed over traffic impacts on neighbouring areas and lack of

⁶⁷ Statement of Common Ground (SCG) between Swindon Borough Council and DPDS Consulting Group on behalf of Kingsdown Village Partnership, incorporating Persimmon Homes and Primegate Properties (Kingsdown) Ltd; April 2014.

direct connectivity to the town, impact of the proposed development on the character and appearance of the rural landscape and on biodiversity, coalescence with the village of Broad Blunsdon to the north, and loss of high quality agricultural land.

166. In response to these concerns, the Council stated that it had introduced the Kingsdown allocation at the pre-submission stage, followed by what it described as a 'lively' public meeting in Blunsdon Village Hall in the winter of 2012/13. I therefore consider that there has been ample time and opportunities for the public to respond to the emerging Plan, as evidenced by the large number of respondents who have done so. The Council has addressed the traffic concerns and in particular has included a scheme for primary access to Kingsdown via a new bridge over the A419, thus avoiding the need to 'rat run' through neighbouring villages for most traffic. This scheme will also deliver highways benefits for existing communities as well.
167. There is an acceptance by the Council that greenfield development will have some impact both on the local landscape and on nearby villages, and policy NC5 requires the residential densities to be lower in the north and west for these reasons. The layout also secures the inclusion of an important wedge of green infrastructure, which separates the allocation into separate development 'islands'.
168. Ecological work shows that there are no statutory designated areas within 1 kilometre of the allocation, whilst around 85% of the agricultural land is below grade 3A, the generally recognised indicator of good agricultural land. A Scoping Statement prepared on behalf of the Kingsdown Development Partnership⁶⁸, establishes in some detail the work that formed the basis of the Council's proposals for the Kingsdown new community and the landscape based structure which forms part of the Master Plan.
169. The policy has been modified to provide for an average residential density of 35 dph, with lower densities in the north and west of the development **[MM55]**, which adds clarity and is justified.

New Eastern Villages (NEV)

170. Policy NC3 provides for a major mixed use development at the New Eastern Villages (NEV), including Rowborough and South Marston Village Expansions. This large extension to the town lies to the east of the A419 trunk road, and straddles both the A420 Swindon-Oxford Road and the main railway line. The policy provides for a series of inter-connected distinct villages, defined by a network of green infrastructure corridors.
171. The proposals include residential areas, employment land, a District Centre and a network of Local Centres, a minimum of 8 forms of entry primary and secondary school provision, health care and other

⁶⁸ *Environmental Statement Scoping Report: Kingsdown Village North East Swindon*, on behalf of Kingsdown Village Partnership: lead consultant DPDS Consulting Group; November 2009 [Examination Document CD25.34, part 2].

community facilities, extensive landscaping, and a policy suite to address renewable energy, sustainable transport links and environmental protection. The policy also provides for the protection of the character and identities of Wanborough, Bishopstone and Bourton through requiring their non-coalescence with the new community.

172. The principle of a strategic expansion of Swindon to the east has been considered for at least two decades, and featured in the Principal Urban Area (PUA) Study of 2003⁶⁹, and subsequently the Swindon Joint Study of 2005⁷⁰, which was prepared as input to the then emerging South West Regional Planning Strategy (RSS). At the RSS Examination in Public, an area of search for 12,000 dwellings was confirmed. However, the recession led to a reassessment of Swindon's economic projections. This in turn led to a reduction in the overall housing requirements for Swindon, and the scaling back of the proposed Eastern Extension to 7,500 dwellings, which was further modified to 8,000 dwellings in policy NC3.
173. The commitment to the successful implementation of the NEV development in accordance with the principles in policy NC3 is demonstrated in 12 SCGs signed by Council and a number of other signatories, including South Marston PC, the Highways Agency (HA), the relevant landowners, house builders, retailers, and property specialists and their agents. There was no doubting the acceptance of some parties and the enthusiasm of others for the proposed development and the general desire to start work on implementation at the earliest opportunity. Two outline planning applications had been received prior to the start of the Hearings; one for the NEV to the north of the A420, for 2,380 dwellings and a range of uses; and one for the employment allocation at great Stall West, close to the White Hart Junction (A419/A420), and developers are in pre-applications discussions in relation to other land within the NEV.
174. Several soundness concerns were raised by a number of parties, including local residents, local authorities and developers. The main points raised in representations and discussed at the Hearings were: (i) whether the extent of housing provision at NEV is unbalanced in relation to the rest of the Plan; (ii) flood risk; (iii) traffic impact on the local and strategic road network; and (iv) the appropriateness of the NEV boundary, and particularly the inclusion of land in the south-east of the proposed development area, at Redlands Farm.
175. I will address each of these concerns in turn, starting with (i) *Is the extent of housing provision at NEV unbalanced?* This concern centres on the implications of the Council putting most of its housing 'eggs' in one 'basket', bearing in mind the relatively large proportion of the total dwellings requirement for Swindon tied up in the one large development at the NEV, and the associated risks to the Plan as a whole if the NEV does not deliver over the plan period. It was alleged

⁶⁹ Wiltshire County Council and Swindon Borough Council: Swindon Principal Urban Area (PUA) Study, September 2003 [Examination Document CD9.1]

⁷⁰ Swindon Joint Study 2026; May 2005 [Examination Document CD9.4].

that if any implementation problems arose, there would be a serious shortfall on delivery, and that what the Plan needed was more flexibility.

176. The Council has already demonstrated in response to my request on Swindon's housing potential⁷¹ that there is sufficient housing land availability to meet the requirements of *the Framework* over the first five years of the plan period, with a significant amount of this coming from a variety of sources, in addition to the NEV. This is borne out by the SHLAA and by several developers/consultants who attended the Hearings, and I am satisfied from the evidence I have read and heard that the Council can meet its housing requirements, as required to do so in *the Framework* (paragraph 47).
177. Moreover, several SCGs⁷² have been signed between the Council and a number of authorities, organisations and developers which demonstrate that collaborative working to ensure the necessary infrastructure is in place and that the proposed housing total for the new community is deliverable within the plan period.
178. I have already addressed the second concern (ii) *flood risk*, under Issue 4. However, I acknowledge that the concerns about fluvial flooding in NEV/South Marston/Wanborough were strongly expressed by several local residents and debated at the Hearings. South Marston PC, however, acknowledged that it had worked closely with the Council on this matter.
179. The overall design concept for the NEV comprises a series of development 'islands', whose indicative boundaries had been drawn with flood risk in mind. The sustainable drainage provisions in policy EN6 will also come into play, as will the requirement for all planning applications to be accompanied by a SFRA. Furthermore, the Council's comprehensive Local Flood Risk Management Strategy has been developed with the EA and Thames Water as key consultees. Whilst there can be no guarantee that no parts of the NEV will ever flood in future, I am satisfied that the issue of flooding has been tackled thoroughly, and that the NEV has been positively prepared in relation to flood risk.
180. Significant concern was expressed over (iii) *traffic impact on the surrounding local roads and strategic highway network*. The Council explained that, with the help of consultants and the HA, a comprehensive evidence base leading to a strategic transport study has provided greater certainty for stakeholders and to inform bids for external funding. All planning applications will be supported by detailed Transport Assessments and Travel Plans, and developers will be required to assess the cumulative impact of traffic growth on relevant parts of the road network. Other positive aspects of the

⁷¹ Council's Response to Inspector's Request MF1: Swindon's Housing Potential; May 2014 [Examination Document CD25.31].

⁷² Statements of Common Ground (SCGs) between Swindon Borough Council and the EA; HA; Thames Water; OCC; Vale of White Horse District Council; South Marston PC; David Lock Associates; and Western Vale Villages; April-May 2014.

transport schemes for the NEV include the express bus route into the town centre and traffic calming measures, such as the 20 mph scheme for South Marston.

181. Changes to policy NC3 (b) to provide more information on the express bus network and for an improved road link under the railway **[MM43 & 39]**, together with the proposed primary access for Rowborough, are likely to effectively address the traffic concerns expressed in many of the representations.
182. Another local concern was (iv) *whether the boundaries of the NEV were drawn appropriately, and in particular the inclusion of Redlands Farm and Airfield*. The inclusion of Redlands Farm and Airfield within the NEV development boundary was opposed primarily by Wanborough PC on several grounds, including the following principal considerations: (a) it was a late inclusion in the emerging Plan, with no planning justification; (b) it ignores the natural boundary of the Linden Brook; (c) it would impact on the environment and the amenities (living conditions) of the nearby village of Wanborough; (d) it would cause 'rat running' along a road whose capacity has not been assessed; (e) its deliverability has not been demonstrated; (f) it appears to be piecemeal development instead of being positively planned; (g) there would be a harmful impact on a county wildlife site; and (h) there would be a risk of flooding associated with the development of the site.
183. In response to these representations: (a) The Council stated that the NEV development boundary included the Redlands site in some earlier documents, including the 2009 Core Strategy document⁷³ and it was not therefore a 'last minute' addition to the Plan, whilst the site is suitable for development with no overwhelming constraints; (b) Linden brook is a feature which should be respected, but the case for it being a strategic boundary is weak; (c) there is no evidence to show that the inclusion of Redlands in the NEV would harm the rural character and identity of Wanborough village or the living conditions of its residents; and (d) the transport modelling shows that the great majority of traffic generated by Redlands would access the A420 to the north, with very little passing through the village of Wanborough to the south.
184. In response to (e) there is no evidence for any deliverability problems; (f) Redlands forms part of a larger development and it is not piecemeal; (g) Wiltshire Wildlife Trust is in agreement in principle to the development of Redlands, and the Council intends to continue talking to that organisation to agree a suitable form of development on the site; and (h) the proposals for the site would be subject to a detailed Flood Risk Assessment at the time a planning application was submitted.
185. Another concern raised at the Hearings was whether its continued use as an airfield was beneficial to the area or whether the impact of light

⁷³ Swindon Borough Core Strategy Proposed Submission Document; 2009, page 89, Figure 16 [Examination Document CD 20.3].

aircraft taking off and landing in relatively close proximity to the new residential areas would be harmful to the living conditions of future occupiers. Although there would be some impact in terms of noise and disturbance, I do not consider this to be a key argument in support of its inclusion for residential development within the NEV. Taking the points raised by Wanborough PC, I am not persuaded that they outweigh the Council's arguments for its inclusion within the NEV.

186. An estimated 30-40 dwellings on the site would make a relatively modest contribution to the total capacity of the new community at the NEV to address Swindon's strategic housing needs and would conform to Government policy, as expressed in *the Framework*, to boost significantly the supply of housing. I therefore consider that the exclusion of Redlands Farm and Airfield from the NEV is not justified on soundness grounds.

Commonhead

187. Policy NC2 provides for a major mixed use development at Commonhead, on the south-east fringe of the town, with good public transport and a strategic highway connection to the town centre. The proposal includes housing areas, employment land, a local centre, a primary school, other community facilities, extensive landscaping and a policy suite to address renewable energy, sustainable transport links, environmental and landscape protection and safeguarding the route of the Wilts and Berks Canal and Day House Lane as a green corridor. The development area in the Plan is scaled down from the original allocation in the adopted Local Plan, and focuses on the area with the least impact on nature conservation and landscape interest and excludes contaminated land.
188. Outline planning permission exists for 890 dwellings, of which 146 have been approved, with the access to be completed within 12 months and the first houses to be built before the end of 2014. The SCG⁷⁴ between the Council and the leading house builders demonstrates both partnership working and commitment to scheme delivery.
189. The policy has been modified [**MM36**] to commit the development to preserve the setting of the Coate Water Country Park, which I consider to be justified. Also, the modification [**MM35**] to increase the housing density at Commonhead from 30 dph to 35 dph is supported as it will increase efficiency of land use in accordance with one of the core planning principles in *the Framework* (paragraph 17[8]). Finally, a change to Figure 9 [**MM33**] shows the indicative phasing of the delivery of housing at Commonhead, which is endorsed on the grounds of the effectiveness of the Plan.
190. One representation argued for a modification to the policy, to include land for development to the west of Day House Lane, known as the Hills Site, and that the inclusion of this site on the Policies Map within

⁷⁴ Statement of Common Ground (SCG) between Swindon Borough Council and Pegasus on behalf of Redrow and Persimmon; April 2014.

an indicative Non-Coalescence Area was neither positively prepared nor justified; that this 'quasi Green Belt' designation was not supported by the evidence; and that the development of sports pitches and allotments on the Hills Site would not compromise the setting of the Country Park further to the west. I also note that there have been changes to the boundary of Commonhead in the past, including and then excluding the Hills Site from the proposed new community, with various reasons given for these changes. However, the remit of this report is to consider the submitted Plan and not previous development boundaries at Commonhead.

191. My attention was drawn to a recent appeal decision⁷⁵, which allowed development on land which I understand approximates to the Commonhead development in policy NC2. The Inspector's Report (IR) describes the south-east to north-west boundary of the proposed development as Day House Lane (paragraph 13), i.e. the same boundary for the site in the submitted Plan. The IR considers the relationship between the appeal development and the Country Park in paragraphs 300-305, and whilst it finds no justification for a 1km stand-off zone to safeguard the Country Park, it seems to reaffirm the adopted Swindon Local Plan⁷⁶ policy DS3j, "*which requires a substantial and robust buffer zone to Coate Water Country Park*" (paragraph 300), and also states that "*A degree of separation would be distinctly marked by Day House Lane itself*" (paragraph 301).
192. The Council explained that the Hills Site was excluded from policy NC2 for the following reasons: (i) to avoid taking on the maintenance liability of the site, which is contaminated with no accompanying remediation report and which also experiences some sinkage; (ii) to avoid development in close proximity to a SSSI; (iii) to minimise the landscape impact of the Commonhead development; and (iv) to keep the substantive development at Commonhead to the east of Day House Lane, as a defensible barrier. The Council also rebutted claims that the designation of the Hills Site was within 'quasi Green Belt', and pointed out that not all forms of development were necessarily excluded in principle from the Indicative Non-Coalescence Area.
193. In common with the above IR and the Council, I consider that Day House Lane forms an appropriate and well-defined strategic barrier to the new community at Commonhead. The Council stated that it had not necessarily closed the door on future development to the west of Day House Lane, and that the most appropriate time to consider this possibility was at the forthcoming Sites Allocation DPD, a view with which I concur.

Issue 7-Conclusion

194. I therefore consider that, subject to the above modifications, the proposed new communities at Wichelstowe, Kingsdown, NEV, Tadpole

⁷⁵ Appeal Decision Ref. APP/U3935/A/11/2155834 for land at Commonhead to the south of Marlborough Road (A4259), adjoining Great Western Hospital, Swindon; 19 March 2012 [Examination Document CD 24.2].

⁷⁶ Swindon Borough Local Plan 2011 [Examination Document CD 16.1].

Farm and Commonhead are positively prepared, justified and deliverable, and they are in line with national policy.

Issue 8 – Are the Plan's policies for the rural settlements positively prepared, justified and deliverable?

195. Policy RA1 which is supported by Highworth PC, aims to rejuvenate the free standing, market town of Highworth and maintain its separate identity. Policy SD2 provides for at least 200 dwellings to meet local housing requirements in the small town over the plan period. The town is one of the main focal points for rural development in the Borough. There is an allowance for further sites to come forward through the Neighbourhood Plan (NP) for Highworth, currently in preparation. The employment provision for the town is covered under Issue 3.
196. Policy RA2 supports maintaining Wroughton's separate identity by keeping the separation between the village and the new community of Wichelstowe to the north-east. The policy is supported by Wroughton PC. Policy SD2 provides for at least 150 dwellings over the plan period. Concerns were expressed by Wroughton PC over pressures to coalesce with both Wichelstowe and the urban area of the town of Swindon to the north.
197. Three house builders expressed concern at what they perceived to be the low level of housing provision for Wroughton over the plan period, and each of them requested that their land should be included in the Plan for housing. There is an allowance, however, for further sites to come forward through the Wroughton NP, currently in preparation, and I see no reason to circumvent this process by including an extra housing site(s) prior to the consideration of additional sites for development in the emerging NP. Such a course of action would, I believe, run counter to the neighbourhood planning expectations of paragraphs 183-185 of *the Framework*, and the Localism Act.
198. CPRE expressed concern over the relaxation of wording in policy RA2, which it alleges, would permit activities which would conflict with Wroughton's location within the setting of the AONB. Modified policy EN5 **[MM24]**, however, protects the AONB from potentially harmful development in areas such as Wroughton. The Plan, of course, should be read as a whole.

Issue 8-Conclusion

199. Taking into account the above considerations, I conclude that the Plan's development provision in Highworth and Wroughton and general restriction on other rural settlements is, subject to the proposed modification, justified for the rural areas of the Borough, bearing in mind the emerging NPs.

Issue 9 – What is the appropriate level of detail in the Plan, and what should be left to supplementary planning documents (SPDs)?

200. This matter relates to my concern, initially raised in my letter of 16 July 2013 to the Council, over the use of SPDs to provide local plan type policies. It is clear from the Regulations that local plan policies, such as those dealing with development management, site allocations and infrastructure contributions, cannot be 'hidden' in SPDs. I expressed this concern at the Hearings and in a written request to the Council for a Statement. Stemming from this, I held a bespoke Hearing session to explore the appropriate level of detail, for example in the Inset Diagrams for the proposed New Communities, so as to gain an understanding from the Council and other participants over the advice in *the Framework* (paragraph 157) and the 'what', 'where' and 'when' questions in the PPG⁷⁷.

201. The Council's response⁷⁸ agrees that more detail is required in relation to both the Inset Diagrams and relevant policies. The Council's suggested revised Inset Diagrams are included in Appendix 2 of my report. They cover the following new communities and South Marston: Figure 9 – Wichelstowe **[MM33]**; Figure 10 – Commonhead **[MM37]**; Figure 11 NEV **[MM46]**; Figure 12 – Tadpole Farm **[MM53]**; Figure 13 – Kingsdown **[MM57]**; and Figure 14 – South Marston **[MM60]**. The additional, largely indicative detail in the Inset Diagrams suggested by the Council following discussion at the Hearings is summarised thus:

- Wichelstowe new community – inclusion of employment land; access points; park and ride scheme; canal route; non-coalescence area; express bus route; and development phasing.
- Commonhead new community – inclusion of development phasing; preserving the setting of Coate Water Country Park; average housing density increase.
- NEV new community – inclusion of parcels or 'islands' of mainly residential development, based on known constraints; area for mixed use, including employment land and District Centre; secondary school; main access points, including the road link under the railway at Rowborough; Green Bridge over A419; park and ride scheme; Southern Connector Road (SCR); canal route; express bus route; non-coalescence area; potential locations for local retail/community hubs; and broad development phasing or delivery areas.
- Tadpole Farm new community – inclusion of express bus route; and development phasing.
- Kingsdown new community – inclusion of development phasing.

⁷⁷ PPG Ref. 12-002-21040306 – What should a Local Plan contain? [Examination Document CD 1.65].

⁷⁸ Swindon Borough Council: Response to Inspector's Request for Statement on MF4 and in response to MF8 and MF9 [Examination Document CD 25.70].

- Development at South Marston – new Inset Diagram to include housing areas; Green Infrastructure; traffic management measures; new village centre; and school expansion.

202. The following changes to policies NC1 – NC5 and RA3 were suggested by the Council:

- Wichelstowe new community: Supportive text to policy NC1 to refer to indicative phasing of development delivery in accordance with the outline planning permission **[MM 33 & 34]**.
- Commonhead new community: Supportive text to policy NC2, to refer to indicative phasing of development delivery in accordance with the outline planning permission; and policy NC2 to increase average housing density to 35.5 dph **[MM 35-38]**.
- NEV new community: Policy NC3 to refer to (a) interconnected distinct villages defined by the network of GI corridors **[MM40]**; (b) AH provision at Rowborough and South Marston and south of the A420 **[MM41]**; (c) delete all references to Eastern Villages SPD and add "subsequent DPDs" **[MM49]**; (d) walking and cycle network improvements to provide good connectivity within the development and to the surrounding area **[MM42]**; (e) new road link under the Bristol to London railway line at Rowborough **[MM39]**; (f) about 12,000 sq m of retail floorspace including a high quality District Centre and a network of local centres **[MM44]**; (h) educational requirements, including secondary, primary and specialist school provision **[MM45]**; (i) supportive text to policy NC3, including broad areas of development, with indicative housing numbers **[MM49]**; and (j) indicative north-south phasing, linked to critical mass around the District Centre and express bus corridor, infrastructure delivery and appropriate mitigation of development impacts **[MM50]**.
- Tadpole Farm new community: Policy NC4 to increase average housing density to 35 dph **[MM51]**; and supportive text to policy NC4 to refer to indicative phasing of development delivery in accordance with the outline planning permission **[MM54]**.
- Kingsdown new community: Policy NC5 and supportive text to refer to indicative phasing of development delivery **[MM57-58]**; to increase average housing density to 35 dph **[MM55]**; and to refer to new bridge across the A419 as the primary access route **[MM56]**.
- Development at South Marston: Delete all references to South Marston Village SPD in policy RA3 **[MM59]**; and supportive text to policy RA3 to refer to broad location of development **[MM 60-61]**.
- Express Bus Network: Change the wording from 'Rapid Transit' to 'Express Bus Network' throughout the Plan **[MM43]**.
- SPDs: Amend the text to explain role of SPDs, e.g. guidance on quality of development **[MM07]**.

203. From the debate at the bespoke Hearing session and the written responses following my request for additional comments, a range of views was put forward. Some respondents considered that policies such as NC3, as currently drafted, met the requirements of both the Regulations and *the Framework*/PPG. Other considered that the Council's suggested modifications were appropriate in relation to what is required by national policy, but the detail should not go any further. Others, mainly opposing significant parts of the Plan, considered that the detail contained in the suggested modifications, fell short of the expectations and requirements of national policy.
204. Having considered all the responses, I remain of the view, which I expressed before the start of the Hearings, and which is set out in my Note MF4, that the submitted Plan fell somewhat short of providing sufficient information to satisfy the fourth, fifth and seventh bullet points of paragraph 157 in *the Framework*. I also consider that some of the references in the submitted Plan to SPDs, in relation to details which are appropriate to local plans, was contrary to the Regulations, which strictly limit the remit of an SPD to a degree which is stricter than in the previous Regulations.
205. I am clear therefore that the Plan would not have been sound had it not introduced a greater level of detail. There was a full opportunity to discuss my Note and the appropriate level of detail at the bespoke Hearing session I referred to earlier, and the contributions and level of discussion were both helpful and constructive.
206. In its requirements on plan-making, *the Framework* strikes a balance between providing clear direction and enabling flexibility; and strong focus is preferred over excessive detail. Achieving the right balance on the appropriate level of detail is challenging. The provisions for plan-making in paragraph 157, however, appear to give some latitude, perhaps in the recognition that no two local plans are exactly alike. This paragraph states that local plans should indicate broad locations (my underlining) for strategic development (bullet 4), which I consider is appropriate for a core strategy type document such as the Plan before me; flexible use of land is also encouraged (bullet 5); and detail is to be provided where appropriate (bullet 5).

Issue 9 - Conclusion

207. I consider that the Council's suggested modifications to the Inset Diagrams and the proposed changes/additional detail in policies NC1-5 and RA3 and supportive text, as set out above, are sufficient to meet the broad 'what', 'when' and 'where' criteria in the PPG. I therefore conclude that the level of detail and clear separation between the Plan and the role of the SPDs as put forward in the above modifications accords with national policy, and demonstrates that the Plan has been positively prepared.

Issue 10 – How does the Plan manage development? How does it deal with uncertainties and risks? How effective is the Plan's monitoring? Are there clear indicators and targets to measure whether the policies are going to be effectively implemented?

Development management

208. The Council explained that high quality design was a key theme of the Plan, which is enabled through policy DE1. In addition to providing guidance for the submission and consideration of planning applications, this policy forms the basis for the SPDs which are being prepared to guide the details of the major development proposals. The changes to the policy and supporting text **[MM09 - 10]** to give it more flexibility whilst addressing important issues of amenity (living conditions) such as privacy, noise and disturbance, accord with the principles in *the Framework* and are therefore supported.

209. Policy DE2 addresses sustainable construction. Whilst its requirements are sustainable, the Government has announced that the Code for Sustainable Homes (CSH) is to be consolidated into the Building Regulations⁷⁹, and the Council's modification to reflect this **[MM11]** is endorsed on the grounds of effectiveness.

Uncertainties and risks

210. The Council explained that the Plan aimed to strike a balance between providing certainty and what is permissible in appropriate strategic detail, whilst ensuring flexibility is embedded. This enables the Plan to be effective and to respond flexibly in changing circumstances, in accordance with paragraph 14 of *the Framework*.

211. The rapid review of the Plan will also ensure that the development provisions will look to the long term, in accordance with paragraph 153 of *the Framework*.

Monitoring

212. The Council explained that the monitoring framework in the Plan identifies appropriate and measurable indicators and targets to monitor the performance of each policy in the Plan, and how they relate to the Plan's strategic objectives. The suggested modification to the explanatory text **[MM02]** in response to my initial concerns⁸⁰ provides the appropriate level of clarity for the effectiveness of the Plan.

Other matters

213. In addition to the ten issues above, other parts and policies of the Plan were subject to representations, some of which the Council has responded to in its minor modifications, which I do not address in this

⁷⁹ Written Ministerial Statement: DCLG – Building Regulations; 9 May 2014.

⁸⁰ Swindon Borough Council Response to Issues raised by the Inspector; August 2013 [Examination Document CD 25.4].

report. None of these representations, however, raise concerns that are fundamental to the soundness of the Plan.

Assessment of Legal Compliance

214. My examination of the compliance of the Plan with the legal requirements is summarised in the table below. I conclude that the Plan meets them all.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The Swindon Borough Local Plan is identified within the approved LDS (6 th Review) dated June 2013, which sets out an expected adoption date of March 2014. Although the timetable has clearly slipped, the amended dates of the key milestones including adoption have been posted on the Council's website. The Local Plan's content is compliant with the LDS.
Statement of Community Involvement (SCI) and relevant regulations	The SCI was adopted in January 2007 and consultation has been compliant with the requirements therein, including the consultation on the post-submission proposed 'main modification' changes (MM)
Sustainability Appraisal (SA)	SA has been carried out and is adequate.
Appropriate Assessment (AA)	The Habitats Regulations AA Screening Report (February 2008) sets out that there was potential for the spatial strategy to have a significant effect on up to three of the European Sites located within 15k radius of Swindon Borough in terms of water resources, water quality and atmospheric pollutants, and therefore an AA was required. The measures proposed in the AA have all been incorporated into the submitted Plan.
National Policy	The Local Plan complies with national policy except where indicated and modifications are recommended.
Sustainable Community Strategy (SCS)	Satisfactory regard has been paid to the SCS.
Public Sector Equality Duty (PSED)	The Local Plan complies with the Duty.
2004 Act (as amended) and 2012 Regulations.	The Local Plan complies with the Act and the Regulations.

Overall Conclusion and Recommendation

215. The Plan has a number of deficiencies in relation to soundness for the reasons set out above which mean that I recommend non-adoption of

it as submitted, in accordance with Section 20(7A) of the Act. These deficiencies have been explored in the main issues set out above.

216. The Council has requested that I recommend main modifications to make the Plan sound and/or legally compliant and capable of adoption. I conclude that with the recommended main modifications set out in Appendix 1, the Swindon Borough Local Plan satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in *the Framework*. The Council intends to amend the Policies Map as detailed in Appendix 2 (attached to this report) and if this is done, the Plan will be effective and therefore sound.

Mike Fox

Inspector

This report is accompanied by Appendix 1 containing the Main Modifications and Appendix 2 showing the Council's changes to the Inset Diagram and Policies Map.

Notes on the Schedules

For ease of reference paragraph and page numbers refer to the Swindon Local Plan 2026 Pre-submission document (December 2012), these may differ from the Submitted Plan (June 2013)

References to Core Documents referred to during the examination of the local Plan are show as CD.xx (e.g. CD21.1). These are core documents are available on the examination webpage. See link to the Examination webpage on <http://www.swindon.gov.uk/localplan>

The Schedules include the following information:

Proposed Modification No.	This unique reference number of each modification proposed to the Plan e.g. MM01
Policy	If a proposed amendment relates specifically to a policy detailed in the Plan, the policy number is referenced
Paragraph	If there is a proposed amendment to a paragraph detailed in the Plan, the paragraph number has been referenced
Policies Map	If there is a proposed amendment to the Policies Map, the appropriate map is referenced All Policies Map Modifications are included at Appendix 2
Inset Map	If there is a proposed amendment to an inset map, the appropriate map is referenced. All Modifications proposed to the Inset Maps are included at Appendix 1. These Maps are also included within the Track Change Local Plan
Page Number	This is the page number where the proposed amendment is detailed in the Plan
Proposed Modification	This information provides detail on the amendment proposed, outlining the justification for the proposed change. Text proposed to be removed from the Plan is shown with a strikethrough, for example Historic , whilst text proposed for insertion into the plan is underlined, for example <u>Heritage</u>

Notes

This gives information as to the reason for the modification and sources where appropriate.

Appendix 1: Schedule of Proposed Main Modifications

Mod. No.	Policy/ Paragraph/ Map Ref.	Page No.	Proposed Modification New text is <u>underlined</u> and text deleted in strikethrough	Notes
MM01	Para. 1.11	12	<p><i>Amend text:</i></p> <p>A small number of <u>The preparation of</u> Supplementary Planning Documents (SPDs) are considered <u>may be</u> necessary to provide more detailed advice on specific topics and areas. in support of the Local Plan. Further details on the contents of these SPDs <u>will be documented within the Local Development Scheme.</u> are referenced at the appropriate policy. The SPDs which will accompany this Plan are:</p> <ul style="list-style-type: none"> ■ The Swindon Design Toolkit (this includes a number of SPD's as referenced in paragraph 4.256); ■ Developer Contributions; ■ South Marston Village; and ■ Eastern Villages. 	
MM02	Para. 1.15	12	<p><i>Amend text:</i></p> <p>The council will produce an annual monitoring report to measure the progress and effectiveness of the development plan. A <u>Monitoring Report will be produced to assess the progress and effectiveness of the local plan as measured against the targets identified in Appendix 6 on an annual basis.</u> The report will include</p>	

Mod. No.	Policy/ Paragraph/ Map Ref.	Page No.	Proposed Modification New text is <u>underlined</u> and text deleted in strike through	Notes
			<u>monitoring of the Local Plan policies, and timeframes for delivery of infrastructure as set out in the Infrastructure Delivery Plan (IDP). It will provide recommendations for policy review and mitigation of significant effects if required, with consideration of significant and unforeseen events which may impact on the effectiveness of the Plan.</u>	
MM03	Insert new Para after 1.15	12	<i>Insert new paragraph:</i> <u>This Local Plan runs to 2026. An immediate review will be undertaken following adoption to ensure that development provision looks to an appropriately long term end date. Such a review is without prejudice to the need for review which may arise through monitoring and identifying changes in the assumptions underpinning the development strategy.</u>	
MM04	SD2	35	<i>Amend part d), add new third bullet point to policy:</i> ■ <u>The strategy shall be reviewed by 2016 at the latest, to assess future levels of need for new homes and employment land over the period to 2031, to provide an appropriate basis for employment land and infrastructure provision.</u>	Text in italics added following consideration of MM consultation.
MM05	SD3	42	<i>Amend part a) of policy:</i> a. When considering development proposal, <u>the Council will take a positive approach</u> will be taken <u>to reflect the a</u> presumption in favour of sustainable development. This means: ■ <u>it will always work proactively and jointly with applicants</u> will work with the Local Planning Authority	

Mod. No.	Policy/ Paragraph/ Map Ref.	Page No.	Proposed Modification New text is <u>underlined</u> and text deleted in strike through	Notes
			<p>to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions, and promotes health and well-being, for those people living and working in Swindon Borough;</p> <ul style="list-style-type: none"> ■ planning applications that are in accordance with the policies in this Local Plan (and with policies in adopted neighbourhood plans) will be approved <u>without delay</u>, unless material considerations indicate otherwise; and, 	
MM06	SD3	43	<p><i>Remove part e) from policy.</i></p> <p>For the New Eastern Villages (including Rowborough and South Marston expansion in line with Policy NC3), and South Marston Village, Supplementary Planning Documents will be adopted.</p>	
MM07	Para 3.38	44	<p><i>Amend text:</i></p> <p><u>The preparation of Supplementary Planning Documents may be required to aid infrastructure delivery including guiding the coordinated and timely manner of development within the Borough. These documents would provide guidance on the quality of development expected and aid the Council in considering planning applications.</u></p> <p>In order that the New Eastern Villages and expanded South Marston are delivered in a co-ordinated and timely manner, with the requisite infrastructure, Swindon Borough Council will prepare Supplementary Planning Documents (SPD) for the New Eastern Villages (including Rowborough) and, with</p>	

Mod. No.	Policy/ Paragraph/ Map Ref.	Page No.	Proposed Modification New text is <u>underlined</u> and text deleted in strike through	Notes
			<p>the South Marston Parish Council, for South Marston village. These will be adopted following the adoption of the Local Plan. These SPDs will :</p> <ul style="list-style-type: none"> ■ provide a more detailed planning context against which to consider planning applications and to provide Swindon Borough Council with the confidence to approve a first phase; ■ provide the mechanism to control the quality of development and to ensure that the needs and aspirations of Swindon Borough Council, its partners and the community are achieved; ■ provide a mechanism to identify in more detail and deliver the necessary infrastructure and mitigation schemes; ■ ensure that development is phased in a sustainable way, which is both economically viable and provides the opportunity for behavioural change and more environmentally sustainable living; and ■ enable local communities, particularly in South Marston, to have a greater input into the planning and development of the area. 	

Mod. No.	Policy/ Paragraph/ Map Ref.	Page No.	Proposed Modification New text is <u>underlined</u> and text deleted in strike through	Notes
MM08	Paras.3.41.4. 281, 4.296, 4.302, 4.313, 4.329 4.343..... 5.39,... 5.47,.... 5.97, and 5.106	45..... 126....1 30....13 2....136140144175178193195	<p><i>Amend text appropriately:</i></p> <ul style="list-style-type: none"> ■ A 'New Eastern Villages' Supplementary Planning Document; ■ A 'South Marston Village' Supplementary Planning Document ■ A Developer Contributions Supplementary Planning Document ■ <u>Any subsequent DPDs</u> 	
MM09	DE1	49	<p><i>Amend policy:</i></p> <p>High standards of design are required for all types of development. Proposals for development shall respond to <u>should address</u> the objectives of sustainable development through high quality design and place-making principles. To ensure this, proposals should address and will be assessed against all the following design principles:</p> <p>a. context and character, <u>in respect of</u>;</p> <ul style="list-style-type: none"> ■ <u>existing built characteristics</u> ■ <u>acknowledged features of importance</u> ■ <u>existing site conditions</u> <p>b. layout, form and function of the development, <u>including in respect of</u>:</p>	

Mod. No.	Policy/ Paragraph/ Map Ref.	Page No.	Proposed Modification New text is <u>underlined</u> and text deleted in strike through	Notes
			<ul style="list-style-type: none"> ■ accessibility, integration <u>connectivity</u>, permeability, legibility, inclusivity, safety & security, efficiency and adaptability; ■ <u>siting, orientation, scale, massing, materials and detailing.</u> <p>c. Amenity, <u>in respect of:</u></p> <ul style="list-style-type: none"> ■ <u>Light, privacy, outlook, noise, disturbance, smell, pollution and space.</u> 	
MM10	Para 4.15	51	<p><i>Amend text:</i></p> <p>The Form of development proposals should create a strong contextual response to sites and be of good <u>deliver high</u> quality architecture <u>design</u> in order to create distinctive identity. The form of development proposals will be assessed in terms of <u>the following: siting and orientation, scale, proportion, shape, massing, rhythm, materials, colour and architectural detailing.</u></p> <ul style="list-style-type: none"> ■ Siting – the relative position and configuration of a building's footprint on a site should address and respond to the existing context (trees, buildings, landscape, topography, etc.), street patterns, neighbouring buildings and the character of the wider area. ■ Orientation – the direction a building faces should ensure corners and vista terminations are addressed, that key buildings 	

Mod. No.	Policy/ Paragraph/ Map Ref.	Page No.	Proposed Modification New text is <u>underlined</u> and text deleted in strike through	Notes
			<p>are prominent and to ensure solar gain is maximised.</p> <ul style="list-style-type: none"> ■ Scale – the size of the built form must relate to its surroundings and respond to context. Individual iconic buildings are often of a size intended to be highly visible however in all cases the scale of development (from mixed use layouts to small extensions) should be justified and not dominate or compromise amenity. ■ Massing – the combined effect of the height, bulk and silhouette of an extension, building or group of buildings must complement the form and function of the development or host building and be in keeping with the character and context of the area. As with Scale (above), individual buildings may challenge the general massing arrangement of a development to create identity and impact, but this must not be to the detriment of other aspects of quality design such as amenity. Massing is considered to include the physical attributes of development such as height, shape, bulk, and the arrangement of these in terms of proportion, rhythm and silhouette. ■ Materials – the choice of materials for buildings and the public realm, in terms of their quality and durability, must suit the context, character and end purpose(s). The use of matching or complementary colours, textures and patterns should assist in ensuring new development is in harmony with the character and context of the surrounding area and where applicable the host building. Contemporary materials that exhibit high performance 	

Mod. No.	Policy/ Paragraph/ Map Ref.	Page No.	Proposed Modification New text is <u>underlined</u> and text deleted in strike through	Notes
			<p><u>and have sustainable credentials should also be considered.</u></p> <ul style="list-style-type: none"> ■ Detailing – relates to the articulation of individual or common elements of a development. Attention to how these elements come together and shape the public and private space is important to delivering high quality design. These include: <u>boundary treatments, enclosures for refuse and recycling provision, landscaping, street lighting and street furniture, building elements such as entrances, doors, windows, cills, lintels, surrounds, porches, bays, balconies, chimneys, roofing details, dormer windows, brick detailing, construction details, etc.</u> 	
MM11	DE2	55	<p><i>Amend part b) of policy:</i></p> <p>All major development (see glossary) shall meet the following sustainable construction standards <u>until superseded by national prescribed standards</u></p>	.
MM12	EC2	63	<p><i>Amend part b), 2nd bullet point of policy:</i></p> <ul style="list-style-type: none"> ■ <u>there has been</u> genuine marketing for commercial (B class) uses for <u>at least 6 months</u> that period of time, at reasonable market values, <u>which</u> has proved unsuccessful, and 	

Mod. No.	Policy/ Paragraph/ Map Ref.	Page No.	Proposed Modification New text is <u>underlined</u> and text deleted in strike through	Notes
MM13	EC2	63	<p><i>Amend part b) 3rd bullet point of policy:</i></p> <ul style="list-style-type: none"> ■ a sequential site <u>appraisal</u> search has been undertaken that takes account of the current quality of the employment area such that loss of the highest quality employment land is minimised, assessing the following factors: 	
MM14	HA1	77	<p><i>Amend part a) 2nd bullet point of policy:</i></p> <ul style="list-style-type: none"> ■ there should be a variety of densities, house types and sizes <u>to meet local needs as identified within the Swindon Strategic Housing Market Assessment and in line with the Swindon Borough Housing Strategy</u> within larger developments 	
MM15	Para 4.110	77	<p><i>Insert at the end of paragraph:</i></p> <p>This housing needs to be responsive to demand, meet future anticipated household and population growth, and address the need for all types of housing and the needs of different groups of people in the local community, <u>particularly in response to the ageing population and to assist independent living at home.</u></p>	
MM16	HA8	92	<p><i>Amend part a) of policy:</i></p> <p>a. <u>Provision for 17 additional gypsy and traveller residential pitches and one travelling showpeople site (in accordance with the latest GTAA) will be made over the plan period. The location (s) of this additional requirement will be identified in a Site Allocation Development Plan Document.</u> Provision for gypsies and travellers and travelling show people will be made in accordance with the updated Need Assessment.</p>	

Mod. No.	Policy/ Paragraph/ Map Ref.	Page No.	Proposed Modification New text is <u>underlined</u> and text deleted in strike through	Notes
			The location(s) of this additional requirement will be identified in a Site Allocations Development Plan Document	
MM17	Para. 4.167	93	<p><i>Amend text:</i></p> <p>The Wiltshire and Swindon Gypsy and Travellers Accommodation Needs Assessment (GTAA) (2006) identified a need for 8 additional residential pitches and no increase in transit pitches at Swindon Borough by 2011. <u>The Swindon Borough Council Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA) (2013) identified a need for 17 additional residential pitches in the next 15 years. The need is split into 5 year periods with 7 pitches required in the initial period 2013-2018, 5 pitches in the period 2018-2023 and 5 pitches 2023-2028. The GTAA (2013) also identifies the need for one travelling showpeople site within the Swindon Borough.</u></p>	
MM18	Insert new para. above 4.191	100	<p><i>Insert paragraph:</i></p> <p><u>Air Pollution</u></p> <p><u>In relation to transport and air pollution, the Habitats Regulations Assessment concluded that the Local Plan is unlikely to have a significant effect on the Special Area of Conservation sites. However it does recommend that the Council place strong emphasis on the delivery of sustainable transport solutions. This is particularly important for those developments taking place in north Swindon that will potentially increase traffic on the A419, which may impact upon the condition status of North Meadow and Clattinger Farm SACs.</u></p>	
MM19	IN2	111	<i>Amend part a) of policy:</i>	

Mod. No.	Policy/ Paragraph/ Map Ref.	Page No.	Proposed Modification New text is <u>underlined</u> and text deleted in strike through	Notes
			<p>Future water supply will be addressed through the implementation of demand management measures, <u>particularly</u> in new development to reduce the use of water, and the prevention of leakages, to increase supply <u>complemented by sustainable new water resources.</u></p> <p><i>Amend part b) of policy:</i></p> <p><u>...land use or environmental impact that any such adverse impact is minimised. There should be no adverse impacts on sensitive ecosystems, particularly SSSIs and the River Kennet.</u></p>	
MM20	Para. 4.229	111	<p><i>Insert at the end of paragraph:</i></p> <p><u>.... context which is reiterated in the Habitats Regulations Assessment (HRA). The HRA Report states the Plan should recognise that the growth proposed, when combined with growth in neighbouring authorities, may indirectly lead to adverse effects on the Special Areas of Conservation, given the known pressures on the water resource. The Plan should therefore make explicit commitments to addressing water demand and promote work on cross boundary solutions, where appropriate, to avoid and mitigate potential impacts.</u></p>	
MM21	IN4	116	<p><i>Amend part a) of policy:</i></p> <p>Any heat produced as part of a renewable energy or combined heat and power (CHP) installation should be productively used on-site or linked to a district energy network. <u>Progress will be measured against a local low carbon electricity target of</u></p>	

Mod. No.	Policy/ Paragraph/ Map Ref.	Page No.	Proposed Modification New text is <u>underlined</u> and text deleted in strike through	Notes
			<u>200MWe by 2020.</u>	
MM22	EN1	139	<p><i>Amend policy:</i></p> <p>a. <u>In accordance with the Swindon Borough Green Infrastructure Strategy</u> Development shall protect and enhance green infrastructure and assets as identified in Appendix 45. This includes the requirement that development must provide for the protection and integration of <u>visually or ecologically important</u> existing trees, hedges and woodlands <u>Development that would result in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland will only be permitted where the need for, and benefits of, the development in that location clearly outweigh the loss.</u></p> <p>b. Development shall <u>provide and</u> design green infrastructure <u>to and integrate with existing green corridors identified on the Proposals Policies Map</u>, to maximise its connections and functions and ensure the sustainable maintenance and management of it.</p>	
MM23	Para 4.324 Insert Inset Map	139	<p><i>Insert indicative Concept Map (Figure 7) and amend text:</i></p> <p>The Swindon Borough Green Infrastructure (GI) Strategy provides a comprehensive plan for the protection of existing and the creation of new green infrastructure in the Borough. <u>Figure 7 the Green Infrastructure Concept Map illustrates the GI in the Borough.</u></p> <p><i>Please see Appendix 2</i></p>	

Mod. No.	Policy/ Paragraph/ Map Ref.	Page No.	Proposed Modification New text is <u>underlined</u> and text deleted in strike through	Notes
MM24	EN5	147	<p><i>Amend part c) of policy:</i></p> <p>c) The North Wessex Downs Area of Outstanding Natural Beauty (AONB) is a nationally recognised area of landscape protection. Proposals within the Borough which are within and / or about <u>abuts</u> the North Wessex Downs AONB must accord with relevant criteria set out in the AONB Management Plan and <u>paragraph 115 and 116 of the NPPF</u>. Proposals outside the AONB should not adversely affect its setting.</p>	
MM25	EN6	149	<p><i>Amend part d) of policy:</i></p> <p>All development proposals must be assessed against the Swindon Surface Water Management Plan and the Local Flood Risk Management Strategy to address locally significant flooding. <u>Local Flood Risk Management Strategy to address locally significant flooding, including within neighbouring authorities.</u> Appropriate mitigation and management measures must be implemented.</p> <p><i>Insert part f) to policy:</i></p> <p><u>Sustainable drainage systems should seek to enhance water quality and biodiversity in line with The Water Framework Directive.</u></p>	Text in italics added following consideration of MM consultation.
MM26	Para 4.357	150	<p><i>Amend text:</i></p> <p>The Swindon Surface Water Management Plan provides an overview of surface water flooding within Swindon Borough, identifying flooding areas and mitigation measures to reduce surface water flooding where feasible. Sources of surface water</p>	

Mod. No.	Policy/ Paragraph/ Map Ref.	Page No.	Proposed Modification New text is <u>underlined</u> and text deleted in strike through	Notes
			flooding include surface water run-off, flooding from groundwater, sewer flooding, watercourse flooding and overland flow. The Local Flood Risk Management Strategy further provides an approach to flood risk management and mitigation measures. The Local Flood Risk Management Strategy provides an approach to flood risk management and mitigation measures, including surface water management. Sources of surface water flooding include surface water run-off, flooding from groundwater, sewer flooding, watercourse flooding and overland flow.	
MM27	EN7	180	<p><i>Insert and amend part b) to policy:</i></p> <p><u>Similarly; where development would be adversely affected by the emission of pollutants from an existing use; the proposal will only be permitted where the users of the future development are protected from loss of amenity from those emissions in accord with Policy DE1.</u></p>	
MM28	EN8	153	<p><i>Insert part c) to policy:</i></p> <p><u>c) Where a site is affected by land stability issues responsibility for securing a safe development rests with the developer and/or landowner, who will be required to carry out the above.</u></p>	
MM29	EN9	154	<p><i>Insert part c) to policy:</i></p> <p><u>c) Where a site is affected by land contamination responsibility for securing a safe development rests with the developer and/or landowner, who will be required to carry out the above.</u></p>	

Mod. No.	Policy/ Paragraph/ Map Ref.	Page No.	Proposed Modification New text is <u>underlined</u> and text deleted in strike through	Notes
MM30	EN10	155	<p><i>Amend part b) of policy and insert parts c-g to policy:</i></p> <p>b. Proposals for development affecting heritage assets shall conserve or <u>and where appropriate</u> enhance their significance and setting. <u>Any harm to the significance of a designated or non-designated heritage asset, or their loss, must be justified. Proposals will be weighed against the public benefits of the proposal; whether it has been demonstrated that all reasonable efforts have been made to sustain the existing use, find new uses, or mitigate the extent of the harm to the significance of the asset; and whether the works proposed are the minimum required to secure the long term use of the asset.</u></p> <p>c. <u>Any alterations, extensions or changes of use to a listed building, or development in the vicinity of a listed building, shall not be permitted where there will be an adverse impact on those elements which contribute to their special architectural or historic significance, including their setting.</u></p> <p>d. <u>Scheduled Monuments and other nationally important archaeological sites and their settings will be preserved in situ, and where not justifiable or feasible, provision to be made for excavation and recording. Development proposals affecting archaeological remains of less than national importance will be conserved in a manner appropriate to their significance. An appropriate assessment and evaluation should be submitted as part of any planning application in areas of known or potential</u></p>	

Mod. No.	Policy/ Paragraph/ Map Ref.	Page No.	Proposed Modification New text is <u>underlined</u> and text deleted in strike through	Notes
			<p><u>archaeological interest.</u></p> <p>e. <u>Development within, or which would affect the setting of, the Borough's Conservation Areas will conserve those elements which contribute to their special character or appearance.</u></p> <p>f. <u>Features which form an integral part of a Park or Garden's historic interest and significance will be conserved and development will not detract from the enjoyment, layout, design, character, appearance or setting of them, including key views into and out from, or prejudice future restoration.</u></p> <p>g. <u>Any development proposal that would affect a locally important or non-designated heritage asset, including its setting, will be expected to conserve its significance, and any harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.</u></p>	

Mod. No.	Policy/ Paragraph/ Map Ref.	Page No.	Proposed Modification New text is <u>underlined</u> and text deleted in strike through	Notes
MM31	EN11 Policies Map	159	<p><i>Amend policy title and insert part d) to policy:</i></p> <p>Policy EN11: Canals <u>Heritage Transport</u></p> <p>d) <u>A deviation route for the Swindon and Cricklade heritage Railway will be safeguarded from its present terminus at Taw Hill Halt south to a new terminus in the Mouldon Hill Country Park as on the Policies Map. Proposals for development should not adversely impact on the integrity of this alignment, or the Swindon and Cricklade Railway's ability to operate the alignment as a heritage railway.</u></p> <p><i>Please see Appendix 2.</i></p>	
MM32	EN11	159	<p><i>Insert part c) to policy:</i></p> <p><u>Proposals shall only be permitted if it can be demonstrated that there is no unacceptable risk to ecology, flood risk, water resources and water quality</u></p>	
MM33	NC1 Replace Figure	175	<p><i>Insert Revised Figure 9 (A4 Inset map)</i></p> <p><i>Please see Appendix 2</i></p>	This MM is included in the Schedule by the Council to make clear that it accepts that the Policies Map will require an amendment so that it reflects Figure 9, which is attached for convenience in Appendix 2.
MM34	Para 5.39	175	<i>Amend text:</i>	

Mod. No.	Policy/ Paragraph/ Map Ref.	Page No.	Proposed Modification New text is <u>underlined</u> and text deleted in strike through	Notes
			<p>Wichelstowe is a key component of the development strategy for the Borough and is linked to many policies and strategies listed in the evidence base. <u>Indicative phasing of the delivery of Wichelstowe is shown on Figure 9 to clarify when development will be delivered in accordance with the consented outline application.</u> Effective Management of development will be achieved through the application of this policy and through:</p>	
MM35	NC2	176	<p><i>Amend part b) 1st bullet point of policy:</i></p> <p>A total of 890 dwellings at an average density of 30<u>35.5</u> dwellings per hectare;</p>	
MM36	NC2	176	<p><i>Amend part e) of policy:</i></p> <p>The area between Coate Water and the new development, <u>as indicated on the Proposal Map,</u> will be protected from development to <u>preserve the setting to the Coate Water Country Park,</u> and the function of Day House Lane as a green corridor will be safeguarded.</p>	
MM37	NC2 Replace Figure	177	<p><i>Insert Revised Figure 10 (A4 Inset map)</i></p> <p><i>Please see Appendix 2</i></p>	This MM is included in the Schedule by the Council to make clear that it accepts that the Policies Map will require an amendment so that it reflects Figure 10, which is attached for convenience in Appendix 2.

Mod. No.	Policy/ Paragraph/ Map Ref.	Page No.	Proposed Modification New text is <u>underlined</u> and text deleted in strike through	Notes
MM38	Para 5.47	178	<p><i>Amend text:</i></p> <p>Commonhead is a key component of the development strategy for the Borough and is linked to many policies and strategies listed in the evidence base. <u>Indicative phasing of the delivery of Commonhead is shown on Figure 10 to clarify when development will be delivered in accordance with the consented outline application.</u> Effective Management of development will be achieved through the application of this policy and through.</p>	
MM39	NC3	179	<p><i>Amend part b) 4th bullet point, 8th sub bullet point</i></p> <ul style="list-style-type: none"> ■ a new road link under or across the Bristol to London railway line connecting the development north and south at Rowborough, and ■ <u>Nnew and/or improved accesses to the A420 for proposed residential and employment uses;</u> 	
MM40	NC3	179	<p><i>Amend part a) of policy:</i></p> <p>Land to the East of the A419, as defined on the Policies Map, is allocated for a mixed-use development. The form of the development shall comprise a series of new <u>inter-connected</u> distinct villages and an expanded South Marston village <u>defined by the network of green infrastructure corridors.</u></p>	
MM41	NC3	179	<p><i>Ament part b) insert bullet point to policy:</i></p> <ul style="list-style-type: none"> ■ <u>Affordable housing shall be provided at Rowborough and south of the A420 in accordance with Policy HA2. Separate proposals are made in Policy RA3 in relation to South Marston</u> 	

Mod. No.	Policy/ Paragraph/ Map Ref.	Page No.	Proposed Modification New text is <u>underlined</u> and text deleted in strike through	Notes
MM42	NC3	179	<p><i>Amend Part b), 3rd bullet point, insert sub-bullet point to policy:</i></p> <ul style="list-style-type: none"> ■ <u>walking and cycle network improvements that integrate with existing networks and provide good connectivity within the development and to the surrounding area;</u> 	
MM43	NC3	179	<p><i>Amend part b) 3rd bullet point, 1st sub-point of policy:</i></p> <p><u>An express bus network bus rapid transit link to Swindon Town Centre from through the district centre that connects the Eastern Villages to Swindon Town centre serving and through the district centre as part of phase 1 of the development, which includes residential development north of the A420, the District Centre and the employment allocation;</u></p>	
MM44	NC3	180	<p><i>Amend part b) 7th bullet point, of policy:</i></p> <p>a maximum of 12,000m² (gross) of retail and complementary uses, of which no more than 20% will be comparison goods. This will comprise a maximum 10,000m² (gross) anchor food store as well as 1,000m² of other small scale retail and complementary uses within the District Centre. The remaining 1,000m² of retail floor space will be distributed across the three new Local Centres and within the expanded South Marston <u>about 12,000m² (gross) of retail floorspace including a high quality District Centre with strong connectivity to the adjacent residential areas, comprising an anchor food store and complementary uses, and a network of Local Centres that offer retail provision of a scale that meets the daily shopping needs of the communities they serve, including the existing</u></p>	

Mod. No.	Policy/ Paragraph/ Map Ref.	Page No.	Proposed Modification New text is <u>underlined</u> and text deleted in strike through	Notes
			<u>community at South Marston.</u>	
MM45	NC3	180	<p><i>Amend part b) 8th, 9th and 10th bullet points, of policy:</i></p> <ul style="list-style-type: none"> ■ <u>a new learning campus educational requirements comprising:</u> <ul style="list-style-type: none"> ○ <u>a minimum of 8 forms of entry of secondary provision;</u> ○ <u>a minimum of 8 forms of entry of primary provision with early learning facilities</u> ○ <u>a site for a special school for children and young persons with profound, multiple and severe learning difficulties for ages 0-25</u> ○ <u>measures to manage the demographic peak at primary and secondary schools;</u> ■ an 8-form entry secondary school, a 2-form entry primary school, a special school for children with profound, multiple and severe learning difficulties for ages 0-19, and a Children's Centre; ■ 3 new 2-form entry primary schools with early years facilities as well as a 1-form entry extension to the existing primary school at South Marston; ■ capacity to manage the demographic peak at primary and secondary schools (for up to 4 forms of entry); 	
MM46	NC3 Replace Figure 10	188	<p><i>Insert Revised figure 11 (A4 Inset map)</i></p> <p><i>Please see Appendix 2</i></p>	This MM is included in the Schedule by the Council to make clear that it accepts that the Policies Map will require an amendment so that it reflects

Mod. No.	Policy/ Paragraph/ Map Ref.	Page No.	Proposed Modification New text is <u>underlined</u> and text deleted in strike through	Notes
				Figure 11, which is attached for convenience in Appendix 2.
MM47	Para 5.77	186	<p><i>Amend text:</i></p> <p><u>The White Hart junction is a critical part of the local and strategic road network, principally providing an interchange between the A420 and the A419 Trunk road. The White Hart Junction also has a critical role in high quality urban design and should provide a gateway to the town.</u></p>	
MM48	Para 5.81	186	<p><i>Amend text:</i></p> <p><u>The proposed alignment will be further defined in the Eastern Villages SPD any subsequent DPD in partnership with stakeholders.</u></p>	
MM49	Para 5.87	188	<p><i>Amend text:</i></p> <p><u>The New Eastern Villages, Rowborough and South Marston are a key component of the development strategy for the Borough and is linked to many policies and strategies listed in the evidence base. Figure 11 illustrates the broad areas of development with indicative housing figures and anticipated delivery timeframes. It is acknowledged that the housing figures and anticipated timeframes are indicative and progress on the differing development islands will be dependent on the necessary infrastructure being delivered, therefore if infrastructure is already in place, there is potential for the delivery of development to be accelerated. The early delivery of any of the sites should not compromise the delivery of the overall infrastructure to support the completed New Eastern Villages as envisaged under this plan. The extent of the development islands is</u></p>	Text in italics added following consideration of MM consultation.

Mod. No.	Policy/ Paragraph/ Map Ref.	Page No.	Proposed Modification New text is <u>underlined</u> and text deleted in strike through	Notes
			<p><u>also illustrated but will be refined through the development management process.</u> Effective management of development will be achieved through the application of this policy and through:</p> <ul style="list-style-type: none"> ■ Alignment of proposals with other related (but non-planning) strategies identified in the “Evidence Base” above; ■ Implementation of the Infrastructure Delivery Plan; ■ A <u>An Eastern Villages including areas to the North of the A420 included in Policy NC3)</u> ■ <u>Any subsequent DPDs</u> ■ A <u>South Marston Village Supplementary Planning Document;</u> ■ A <u>Developer Contributions Supplementary Planning Document;</u> ■ <u>Guidance in SPDs</u> ■ Development Framework Plan, design codes and masterplan; ■ Continuing dialogue between the Council, the local community and developers <u>and neighbouring authorities</u>; and 	

Mod. No.	Policy/ Paragraph/ Map Ref.	Page No.	Proposed Modification New text is <u>underlined</u> and text deleted in strike through	Notes
			<ul style="list-style-type: none"> ■ The development management process. 	
MM50	Insert new Para below 5.87	188	<p><i>Insert text:</i></p> <p><u>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 progress on a range of sites within the New Eastern Villages at differing periods to that anticipated and identified on the map depending on access arrangements and other policy requirements including the provision and timely delivery of necessary infrastructure and appropriate mitigation of development impacts.</u></p>	
MM51	NC4	189	<p><i>Amend Part b) 1st bullet of policy:</i></p> <ul style="list-style-type: none"> ■ <u>a total of 1,695 dwellings at an average density of 35 dwellings per hectare</u> 	
MM52	NC4	189	<p><i>Amend Part c) 3rd bullet point of policy:</i></p> <ul style="list-style-type: none"> ■ vehicular access routes from Tadpole Lane and a new route north to connect to Swindon via <u>Ermin Street, Blunsdon</u> (the former A419) and <u>under the new A419(T) at the existing underpass;</u> 	
MM53	NC4 Replace Figure 12	190	<p><i>Insert Revised Figure 12 (A4 Inset map)</i></p> <p><i>Please see Appendix 2</i></p>	This MM is included in the Schedule by the Council to make clear that it accepts that the Policies Map will require an amendment so that it reflects Figure 12, which is attached for convenience in Appendix 2.

Mod. No.	Policy/ Paragraph/ Map Ref.	Page No.	Proposed Modification New text is <u>underlined</u> and text deleted in strike through	Notes
MM54	Para 5.97	192	<p><i>Amend text:</i></p> <p>Tadpole Farm is a key component of the development strategy for the Borough and is linked to many policies and strategies listed in the evidence base. <u>Indicative phasing of the delivery of Tadpole Farm is shown on Figure 12 to clarify when development will be delivered in accordance with the consented outline application.</u> Effective management of development will be achieved through the application of this policy and through:</p>	
MM55	NC5	192	<p><i>Amend part b) 1st bullet point:</i></p> <ul style="list-style-type: none"> ■ <u>A total of 1,650 dwellings, at an average density of 35 dwellings per hectare, with lower densities in the north and west of the development</u> 	
MM56	NC5	193	<p><i>Amend part c), 1st bullet point:</i></p> <ul style="list-style-type: none"> ■ <u>a new all vehicular bridge across the A419 to connect to the Swindon urban area as the primary access route;</u> 	
MM57	NC5 Replace Figure 12	195	<p><i>Insert Revised Figure 13 (A4 Inset map)</i></p> <p><i>Please see Appendix 2.</i></p>	This MM is included in the Schedule by the Council to make clear that it accepts that the Policies Map will require an amendment so that it reflects Figure 13, which is attached for convenience in Appendix 2.

Mod. No.	Policy/ Paragraph/ Map Ref.	Page No.	Proposed Modification New text is <u>underlined</u> and text deleted in strike through	Notes
MM58	Para 5.106	195	<p><i>Amend text:</i></p> <p>Kingsdown is a key component of the development strategy for the Borough and is linked to many policies and strategies listed in the evidence base. <u>Indicative phasing of the delivery of Kingsdown is shown on Figure 13 to clarify when development will be delivered.</u> Effective management of development will be achieved through the application of this policy and through:</p>	
MM59	RA3 and Para 5.133	201 / 203	<p><i>Amend part b) 9th bullet point of policy:</i></p> <p>ensure other development/redevelopment opportunities on existing (brownfield) sites in the west and north of the village provide strong links with the village and make the appropriate infrastructure contributions to mitigate their impact in broad accordance with the South Marston Village SPD;</p> <p><i>Amend text:</i></p> <p>The Borough Council is now engaging <u>working</u> with South Marston Parish Council, and in consultation with village residents, in preparing a South Marston Village SPD. This will <u>to</u> help support an integrated approach to the development of the village and will benefit the current and future community of South Marston. Developer contributions will be required from all developments identified through the South Marston Village SPD.</p>	

Mod. No.	Policy/ Paragraph/ Map Ref.	Page No.	Proposed Modification New text is <u>underlined</u> and text deleted in strike through	Notes
MM60	RA3 Insert New Figure	203	<i>Insert New Figure 14 'South Marston Inset Map' (A4 Inset map)</i> <i>Please see Appendix 2</i>	This MM is included in the Schedule by the Council to make clear that it accepts that the Policies Map will require an amendment so that it reflects Figure 14, which is attached for convenience in Appendix 2.
MM61	RA3 Para 5.136	203	<p><i>Amend text:</i></p> <p><u>Expansion of South Marston is a key component of the development strategy of the Borough and is linked to many policies and strategies listed in the evidence base. Figure 14 indicates the broad location of development. Effective management of development at South Marston will be achieved through the application of this policy and through:</u></p> <ul style="list-style-type: none"> ■ Integrate with the character of the existing village and its landscape setting and <u>it is anticipated</u> this will be controlled <u>through the preparation of a guided by Village Supplementary Planning Document(s) and Village Design Codes;</u> ■ New Eastern Villages Supplementary Planning Document; Any subsequent DPDS; ■ Engagement with the community of South Marston through the Parish Council; ■ Village Design Codes; and ■ Developer Contributions Supplementary Planning Document. 	

Mod. No.	Policy/ Paragraph/ Map Ref.	Page No.	Proposed Modification New text is <u>underlined</u> and text deleted in strike through	Notes
MM62	Appendix 6	247	<i>Delete and replace with revised trajectory.</i>	
MM63	All references in the Local Plan Key for Policies Map	-	<i>Amend all references:</i> Rapid Transit replaced with <u>Express Bus Network</u> <i>Please see Appendix 2 for amended Key</i>	This MM is included in the Schedule by the Council to make clear that it accepts that the Policies Map will require an amendment so that it reflects Figures 9 - 14, which are attached for convenience in Appendix 2.

Appendix 2:

Swindon Borough Local Plan 2026:

**Main Changes to the Inset Diagrams
and Policies Map**

**THIS PAGE INTENTIONALLY
LEFT BLANK**

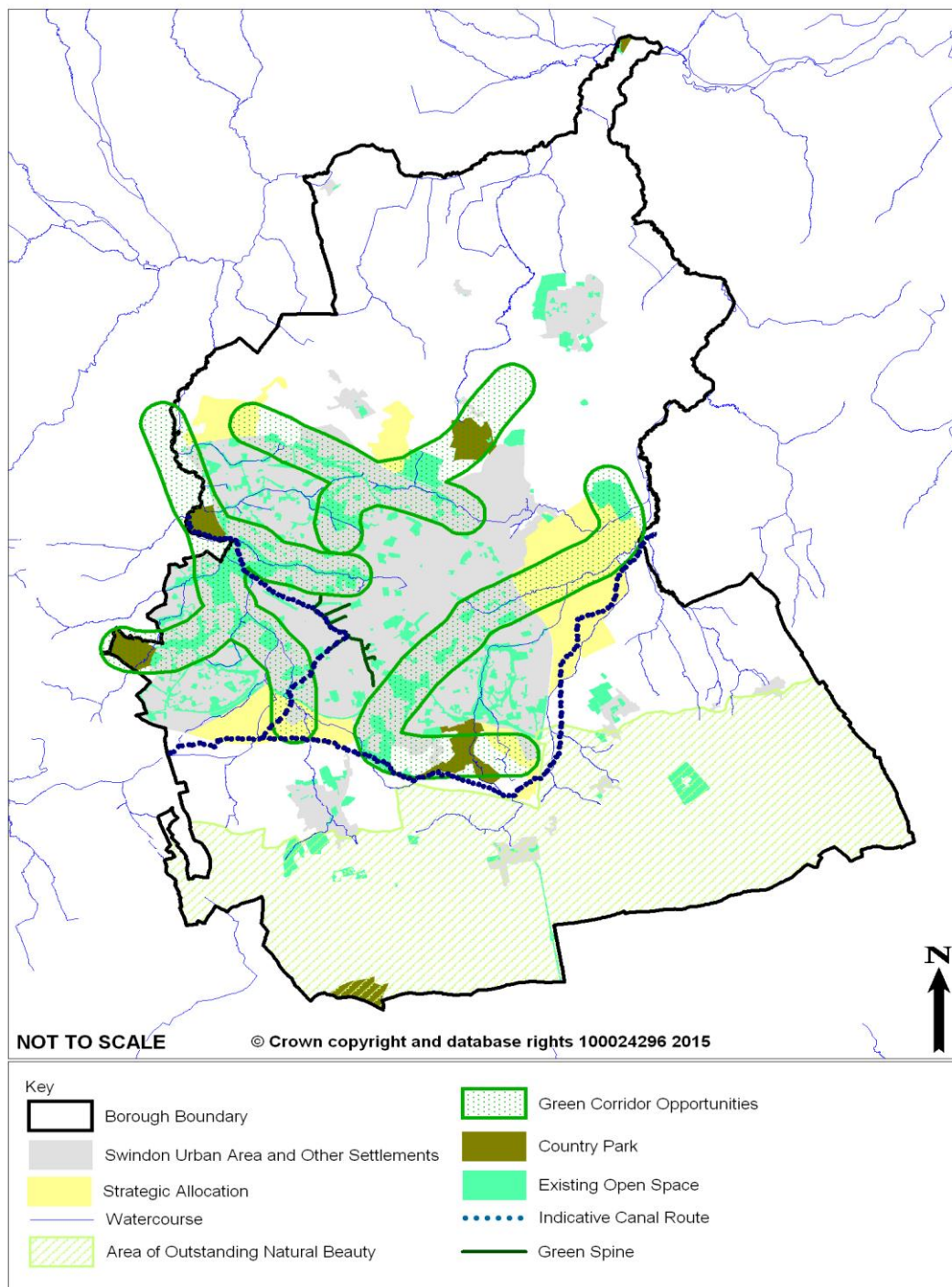
Swindon Borough Local Plan 2026

Document Inset Diagram Modification

Proposed Modification Number: MM23

Inset Map: Figure 7 'Indicative Green Infrastructure Concept Map'

Modification: Insert New Figure



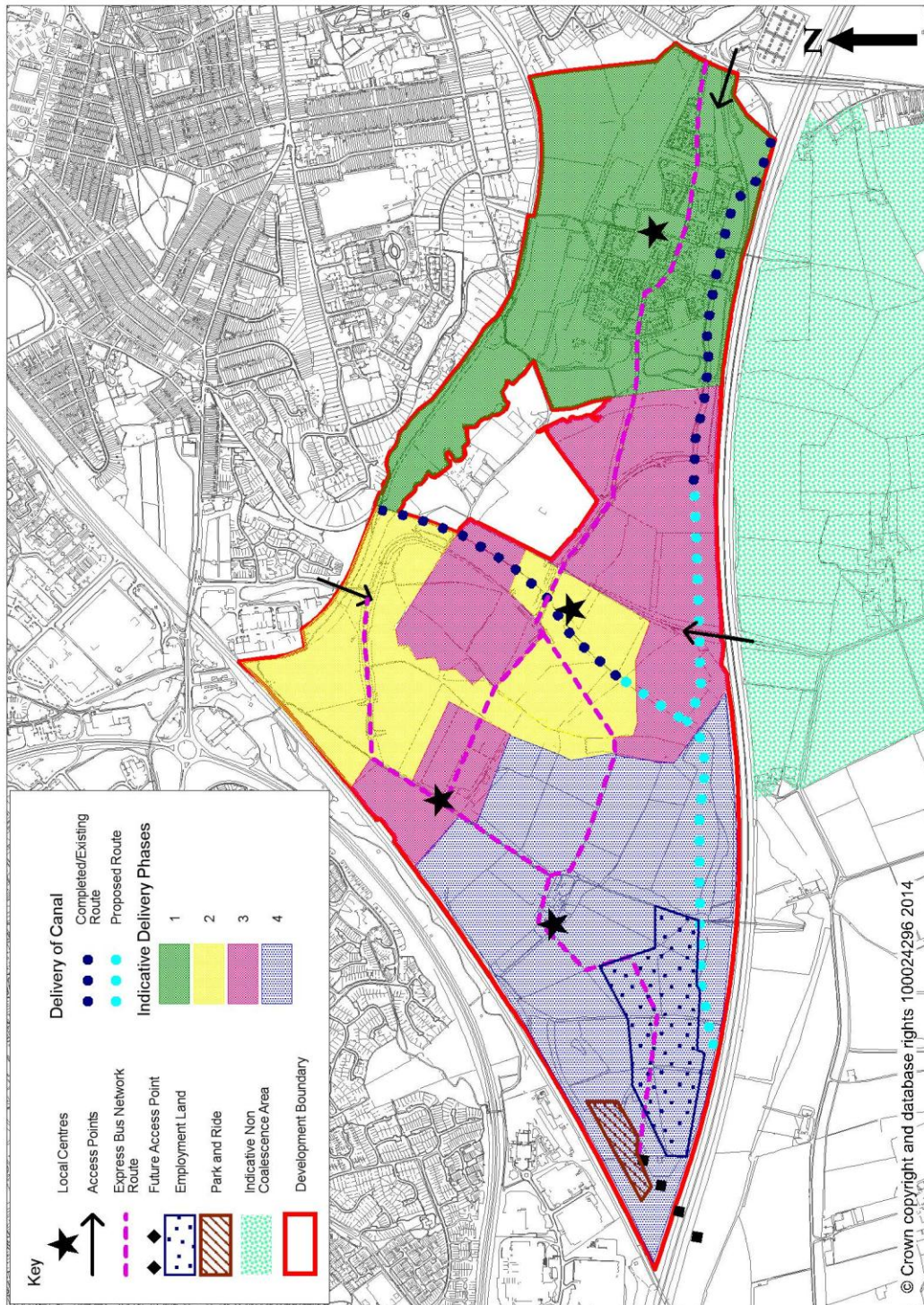
Swindon Borough Local Plan 2026

Document Inset Diagram Modification

Proposed Modification Number: MM33

Inset Map: Figure 9: Wichelstowe Inset Diagram

Modification: Insert Revised Figure 9 (A4 Inset Map) (not to scale)



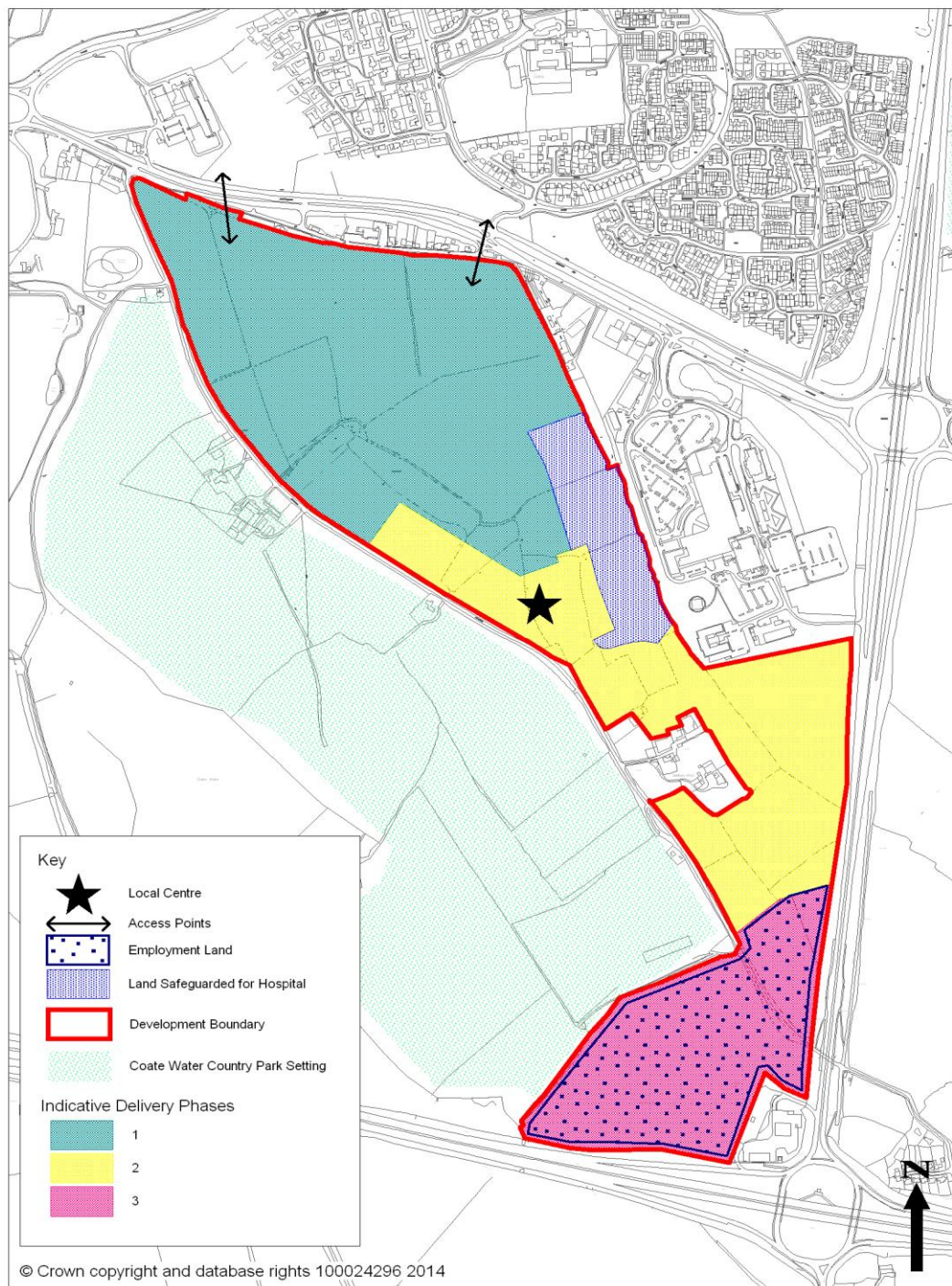
Swindon Borough Local Plan 2026

Document Inset Diagram Modification

Proposed Modification Number: MM37

Inset Map: Figure 10: Commonhead Inset Diagram

Modification: Insert Revised Figure 10 (A4 Inset Map) (not to scale)



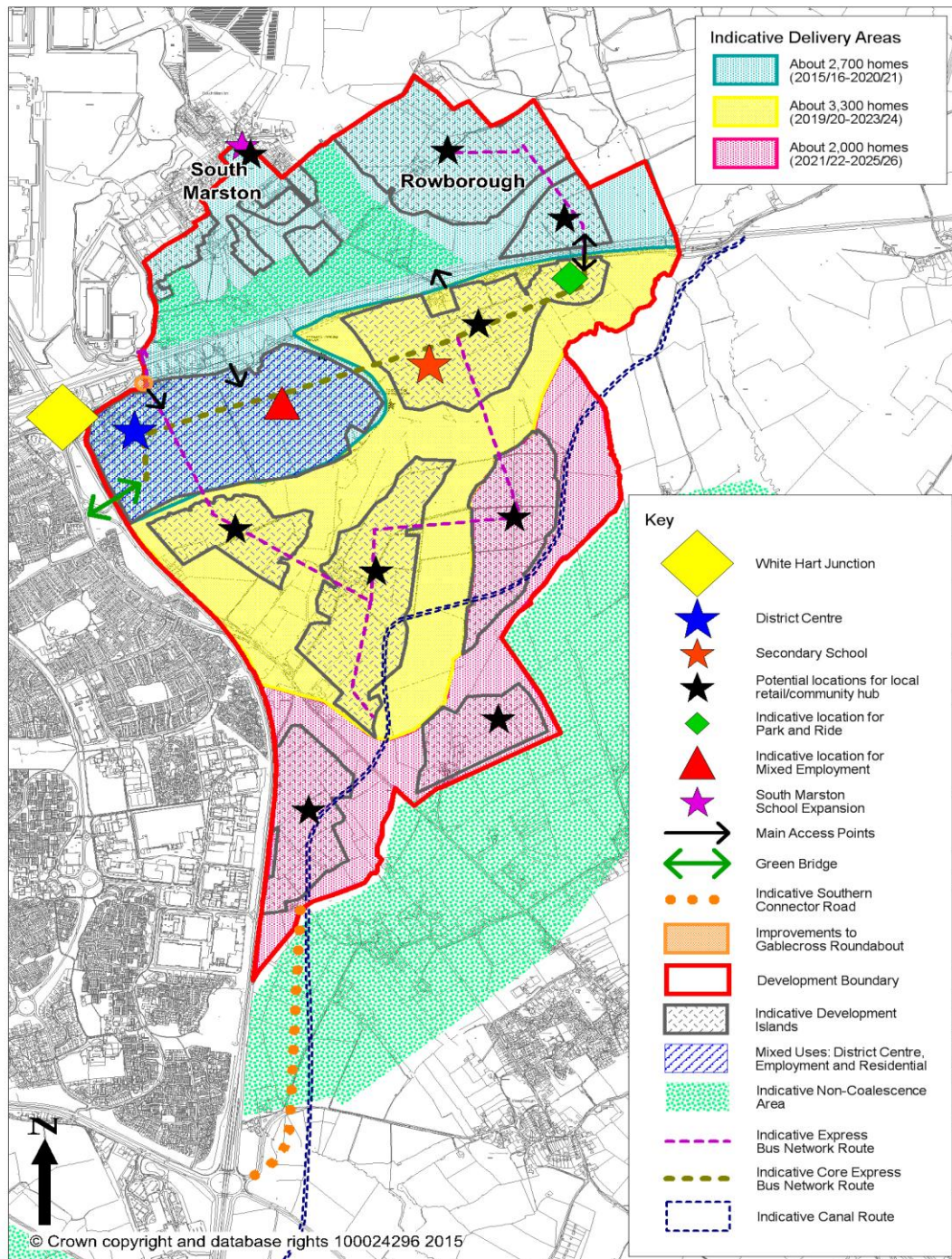
Swindon Borough Local Plan 2026

Document Inset Diagram Modification

Proposed Modification Number: MM46

Inset Map: Figure 11: New Eastern Villages Inset Diagram

Modification: Insert Revised Figure 11 (A4 Inset Map) (not to scale)



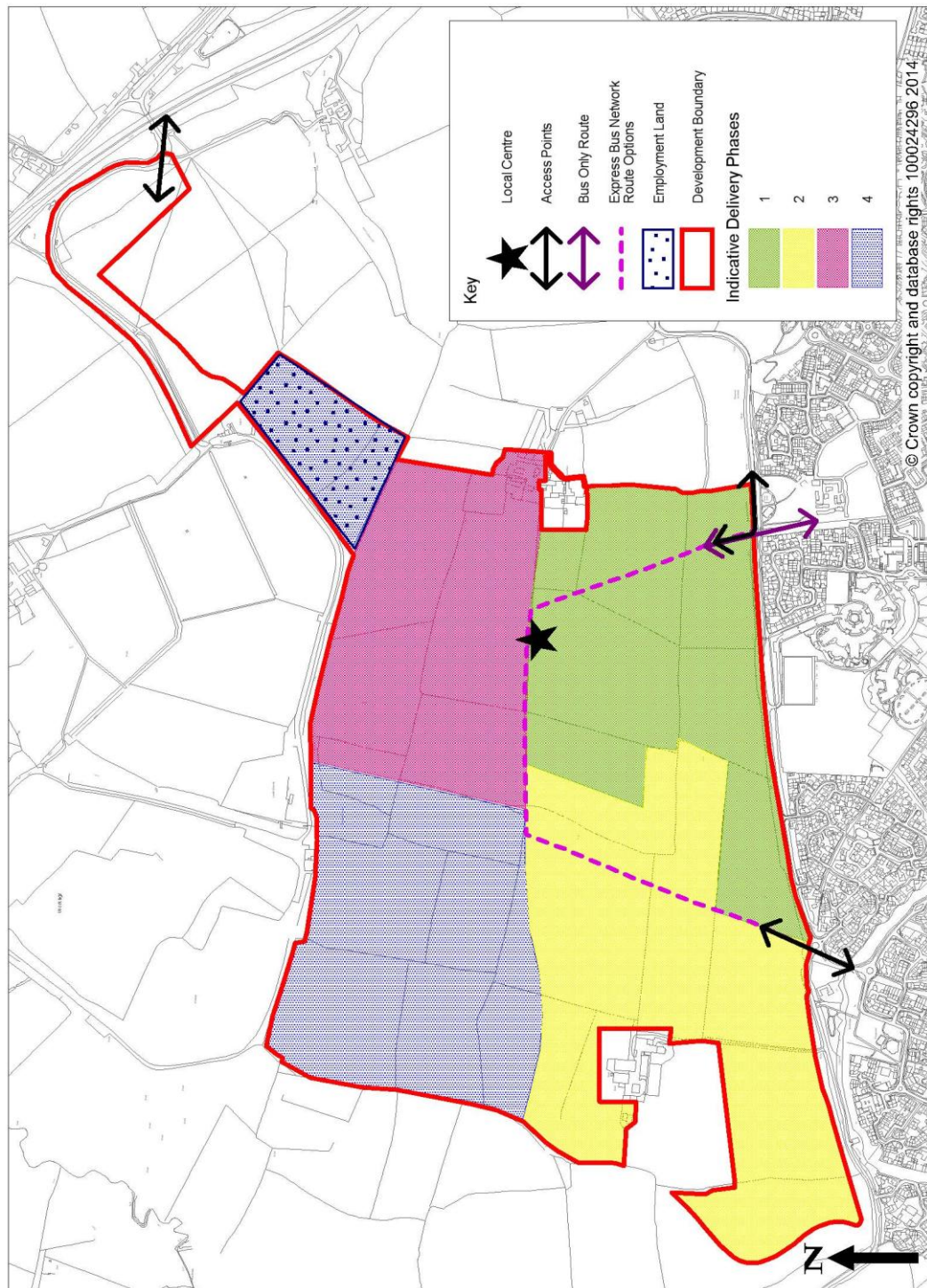
Swindon Borough Local Plan 2026

Document Inset Diagram Modification

Proposed Modification Number: MM53

Inset Map: Figure 12: Tadpole Farm Inset Diagram

Modification: Insert Revised Figure 12 (A4 Inset Map) (not to scale)



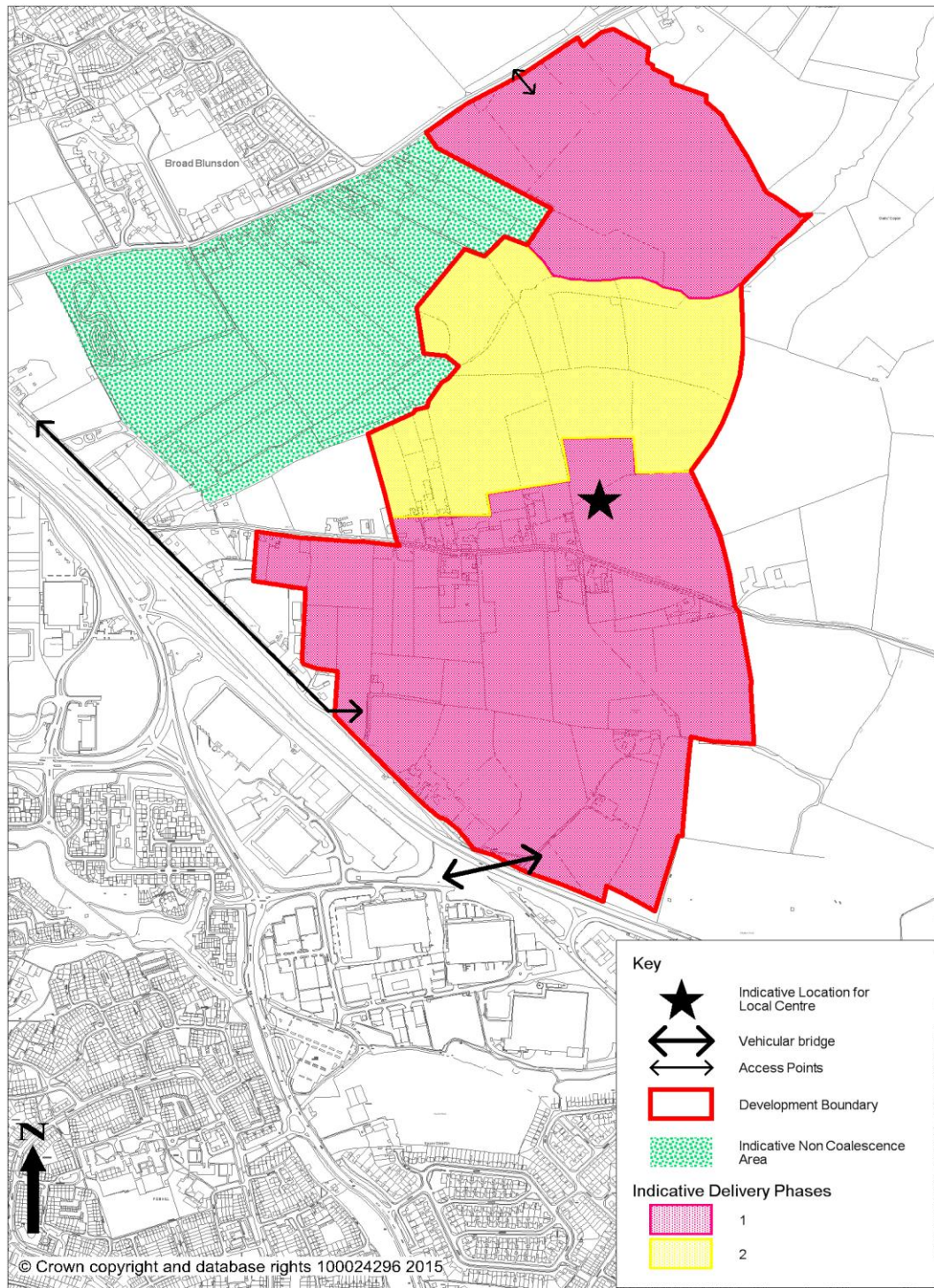
Swindon Borough Local Plan 2026

Document Inset Diagram Modifications

Proposed Modification Number: MM57

Inset Map: Figure 13: Kingsdown Inset Diagram

Modification: Insert Revised Figure 13 (A4 Inset Map) (not to scale)



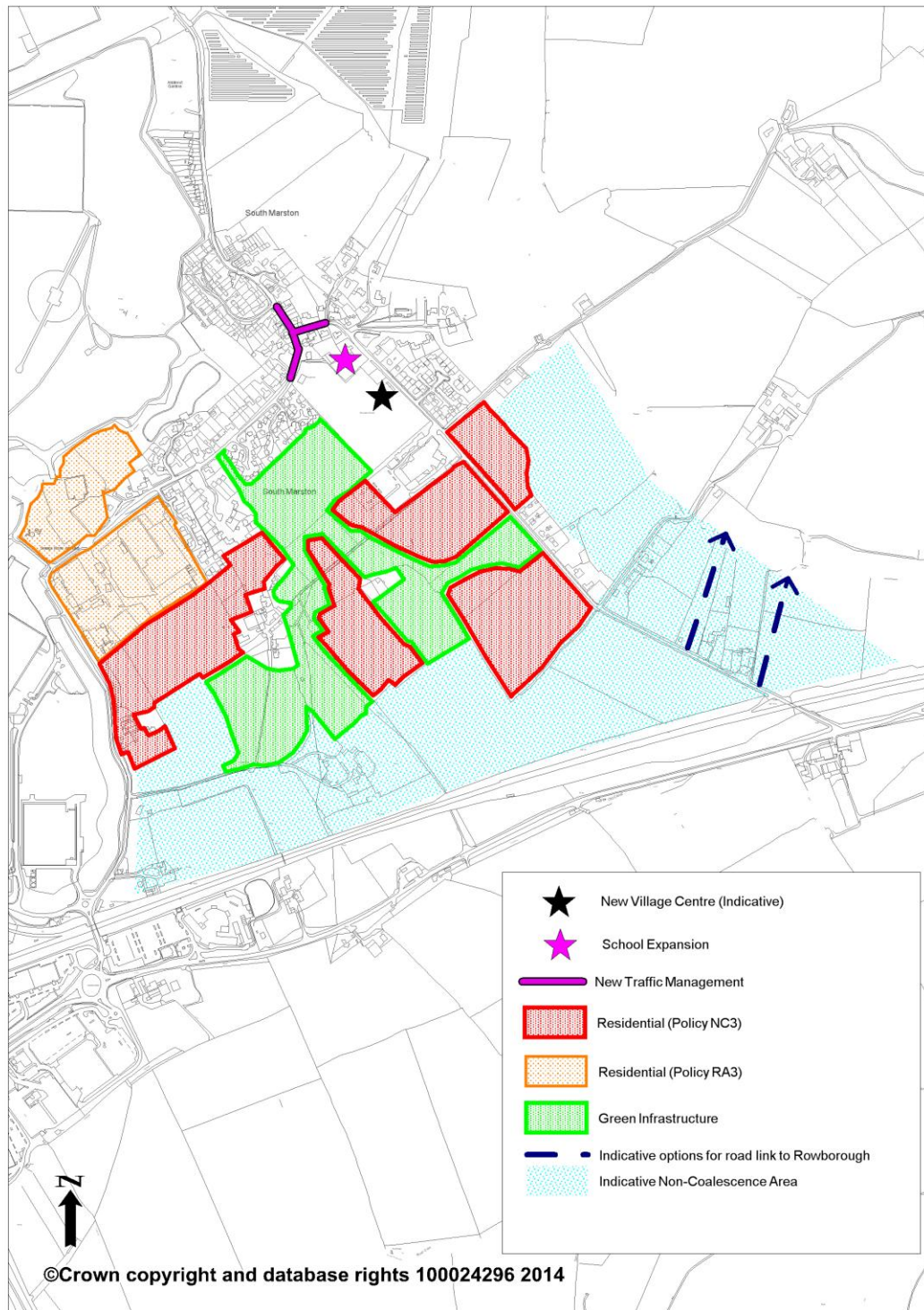
Swindon Borough Local Plan 2026

Document Inset Diagram Modification

Proposed Modification Number: MM60

Inset Map: Figure 14: South Marston Inset Diagram

Modification: Inset New Figure (not to scale)



Swindon Borough Local Plan 2026

Policies Map Modifications

Proposed Modification Number: MM31

Map Inset: Boroughwide/Urban Area Policies Maps

Modification: Add 'Safeguarded route for Swindon and Cricklade Railway'



Not to Scale - Please refer to the Swindon Borough Local Plan 2026 - Pre-Submission Draft Policies Maps

This map is reproduced from Ordnance Survey material with the permission of Ordnance Survey on behalf of the Controller of Her Majesty's Stationery Office © Crown copyright. Unauthorised reproduction infringes Crown copyright and may lead to prosecution or civil proceedings. Swindon Borough Council 100024296

Swindon Borough Local Plan 2026

Policies Map Modifications

Proposed Modification Number: MM63

Map Inset: Boroughwide/Urban Area Policies Maps

Modification: Amend Key for Policies Maps to reflect amendment to Policy TR1.



Not to Scale - Please refer to the Swindon Borough Local Plan 2026 - Pre-Submission Draft Policies Maps

This map is reproduced from Ordnance Survey material with the permission of Ordnance Survey on behalf of the Controller of Her Majesty's Stationery Office © Crown copyright. Unauthorised reproduction infringes Crown copyright and may lead to prosecution or civil proceedings. Swindon Borough Council 100024296 2014

This page is intentionally left blank