

The Swindon Borough Local Plan Review and the Swindon and Wiltshire Joint Spatial Framework Issues Consultation November to December 2017

Report on Comments Received

April 2019

This report may be viewed or downloaded from our website <https://swindon-consult.objective.co.uk/portal/>

Planning Policy, Swindon Borough Council, Wat Tyler West, Beckhampton Street, Swindon

E-mail: forwardplanning@swindon.gov.uk

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1. Introduction

1.1 This document reports on the comments received to the Swindon Borough Local Plan Review and the Swindon and Wiltshire Joint Spatial Framework Issues Consultation held between November and December 2017.

What did we consult on?

1.2 The Swindon Borough Local Plan review will replace and update the current Swindon Borough Local Plan 2026. The consultation comprised two parts:

- A consultation on a proposed approach to joint working with Wiltshire Council through a Joint Spatial Framework ('JSF') held concurrently with Wiltshire Council.
- A consultation on issues and options for the Swindon Borough Council Local Plan review.

1.3 The two parts of the consultation were supported by separate 'issues papers' which included consultation questions (11 for the JSF consultation and 34 for the Local Plan review consultation). A number of supporting technical documents were also published, including the Swindon and Wiltshire Strategic Housing Market Assessment, the Swindon and Wiltshire Functional Economic Market Area Assessment, and the Swindon Borough Employment Land Review.

The consultation period

1.4 The consultation took place between 7 November 2017 and 19 December 2017. Emails were sent to 895 contacts in the forward planning consultation database notifying them of the consultation.

1.5 A notice of the consultation was placed in the Swindon Advertiser newspaper on 6 November 2017. An article in the Swindon Advertiser on 22 November 2017 reported on the plan review.

1.6 In addition, the following consultation events took place:

- A briefing for parish councillors and ward members on the evening of 16 November 2017 at the STEAM museum in Swindon
- A briefing with community groups held at the Council's Civic Offices on the evening of 27 November 2017
- A lunchtime briefing with NHS and Swindon Borough Council public health officers held on 1 December 2017 at the Council's Civic Offices.

- A breakfast forum with developers held jointly with Wiltshire Council on 13 December 2017 at Chippenham Town Hall.

Comments received

- 1.7 In total approximately 240 representations were received by Swindon Borough Council and Wiltshire Council to the Joint Spatial Framework consultation, as follows:
- 204 representations (separate people or organisations) submitted 502 comments to Wiltshire Council
 - 38 representations were submitted to Swindon Borough Council
 - 18 representations were submitted to both authorities.
- 1.8 Of the comments submitted to Swindon Borough Council, 12% were from parish/town councils, 53% were from developers/landowners, and 12% were from members of the public.
- 1.9 In addition, 70 representations were received specifically relating to the Swindon Borough Council Local Plan review issues and options consultation.

How the comments will be used

- 1.10 As we progress the Local Plan review and joint working with Wiltshire Council, the comments will help us refine our approach and develop proposed policies.
- 1.11 This document summarises some of the main topics raised by respondents. The full responses can be accessed via the above link.

2. Summary of comments – JSF consultation

- 2.1 The following principal issues were raised in comments on the Swindon and Wiltshire Joint Spatial Framework:
- JSF should be a statutory plan similar to the approach of the West of England authorities.
 - There should be a longer time frame for the JSF or at least a section of the JSF which addresses the long term vision for the combined geography of Swindon and Wiltshire to provide greater certainty for housebuilding sites which will take many years to be built and support funding needed to provide major infrastructure.
 - The timetable for work, which relates to the Government's requirement to review the adopted local plans within 5 years, is too ambitious given the amendments to the National Planning Policy Framework (NPPF) and the

emerging standard methodology for calculating objectively assessed need. The timetable of work and programme should be reconsidered.

- Some respondents suggested the Councils should be using the government's standard methodology for calculating OAN, whereas others expressed support for the findings of the SHMA. Some developers pushed for higher housing numbers to support housing affordability and/or economic growth.
- Few comments challenge the outcome of the FEMAA. However, some respondents considered the projections employment growth at Swindon to be too low.
- There were many representations from planning consultants promoting development sites on behalf of land-owners or developers.
- Infrastructure and deliverability were identified as important issues for future housebuilding at Swindon.
- There was general support for realising brownfield land for housing development, but also comments that this could not be relied upon to fully meet the needs. There was some support for additional growth at the larger rural settlements, mainly from developer interests at those locations. There was developer support for a development strategy that comprises a mix of different site sizes and locations.

2.2 A detailed summary of themes emerging from responses to the JSF consultation questions together with office responses is provided in [Appendix 1](#).

3. Summary of comments – Local Plan Review consultation

3.1 The following principal issues were raised in comments on the Swindon Local Plan Review:

- A number of respondents supported a review of retail policies and the replacement of central area action plan policy to respond to market changes.
- A number of respondents highlighted the importance of central area regeneration and that regeneration of the central area is vital to improving the business attractiveness of the town. Concerns were expressed about the amount of out of town retail in the town.
- There was considerable support for Swindon remaining the focus for larger scale development. However, there was support for a review of the

settlement hierarchy with a number of developers promoting land at villages.

- Concerns were raised about jobs growth not keeping pace with housing growth and lack of land being available for employment development land in the short term.
- Most respondents did not feel that the Local Plan housing policies were working in view of the absence of a five year housing land supply.
- Sites were put forward by landowners and developers for residential and employment development and will be assessed in the Strategic Housing and Economic Land Availability Assessment.
- There was support from some respondents for stronger policy on delivering bicycle infrastructure because it was felt that current policy on promoting sustainable transport was not translating into delivery.

3.2 A detailed list of themes emerging from responses to the Local Plan Review consultation questions together with officer responses is provided in [Appendix 2](#).

Appendix 1

Joint Spatial Framework Consultation Themes

Question 1:

Do you agree with the proposed scope of the Swindon and Wiltshire Joint Spatial Framework as set out below? If not, please explain why.

The following principal issues were raised:

Deliverability

Concerns expressed by CPRE that development since 2006 has not taken place in the way it was intended and so there is a lack of confidence.

Additionally, concern is expressed about green field sites being developed before brownfield sites are delivered.

Officer response

Swindon Borough Council is working with the development industry to deliver the strategic urban extensions planned in the Swindon Borough Local Plan 2026. Development of the New Eastern Villages, Wichelstowe and Kingsdown strategic sites has not come forward to the timetable that had been anticipated, but progress has now been made.

The Councils are unable to require that brownfield sites are developed ahead of greenfield sites.

Swindon HMA housing number

Paul Newman New Homes suggested that the Strategic Housing Market Area Assessment of future housing need for the Swindon HMA is too low.

Officer response

The intention of the authorities is to use the standard methodology for calculating Local Housing Needs as required by the new NPPF and Planning Practice Guidance.

Five year housing land supply

Question raised as to what areas will be used for five year housing land supply monitoring.

Officer response

In accordance with government policy, housing land supply monitoring will take place at a local authority level.

HMA boundaries

One respondent questioned why it is necessary to define new HMA boundaries (CPRE). Another expressed concern about the impact of defining the Swindon HMA

to include Wiltshire villages in terms of development pressures and traffic generation (Purton Parish Council).

One respondent suggested that the Swindon HMA would represent a more appropriate area for the Swindon and Wiltshire JSF than all of Swindon and Wiltshire.

Another respondent questioned why parts of the Vale of White Horse in Oxfordshire and southern parts of Cotswold District Council area are not included within the Swindon Housing Market Area (Mactaggart & Mickel Strategic Land).

Officer response

The definition of the Swindon HMA set out in the Strategic Housing Market Area Assessment is local evidence on the housing market geography for the Swindon area. This evidence will inform joint working on the strategic issue of meeting housing need in the Swindon area.

The document entitled Swindon & Wiltshire Strategic Housing Market Assessment VOLUME ONE Defining the Housing Market Areas June 2017, which was one of the supporting documents for the consultation, explains at paragraph 5.26 that “Whilst Swindon HMA covers parts of the Cotswolds and Vale of White Horse, these areas represent very few of the HMA residents (4% and 2% respectively) and relatively small proportions of the two local authority populations (14% and 6%); so on balance it is probably not appropriate to include them within the “best fit” for Swindon HMA.”

Statutory plan

A number of respondents expressed the view that a Joint Spatial Framework between Wiltshire Council and Swindon Borough Council should be a statutory plan. This issue was raised by or on behalf of Mactaggart & Mickel Strategic Land, Gladman Developments, Hills UK Ltd, Home Builders Federation, Taylor Wimpey Strategic Land Limited, Redrow Homes South West, Persimmon Homes, Cooper Estates Limited, Stagecoach West, Homes and Communities Agency, Crest Nicholson, and Robert Hitchins Limited.

Particular concerns were expressed that a non-statutory plan would not be subject to examination in public and that this could limit opportunities for developers and landowners to challenge the total amount or distribution of planned housebuilding if considered contrary to their interests.

Examples of joint plans were cited by some respondents in support of a joint statutory plan. Some suggested that there are indications that central government favours joint statutory plans.

Concern was expressed that a non-statutory JSF would lack status in the determination of planning applications and may not be adhered to by the authorities. Some suggest that a statutory plan would better support economic growth.

Officer response

Wiltshire Council and Swindon Borough Council have, following the comments received and the publication of the new NPPF, reviewed their approach to bringing forward the local plan reviews.

The NPPF identifies that a strategic plan can be produced by local planning authorities either working together or independently. Strategic plan-making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans. In order to demonstrate effective and on-going joint working, strategic plan-making authorities should prepare and maintain statements of common ground documenting cross boundary matters being addressed.

The Councils have concluded that the most efficient and proportionate approach to the plan reviews is the preparation of separate strategic plans for Wiltshire and Swindon Borough informed by joint working.

Time horizon

Some respondents favoured a longer plan period to support the planning of more significant infrastructure enhancements or suggested there should be a long term vision (e.g. Mactaggart & Mickel Strategic Land, Taylor Wimpey).

Oxfordshire County Council suggested there would be benefits of aligning with the Oxfordshire statutory plan to 2050.

Officer response

The requirement in the NPPF is for a minimum fifteen year time horizon. Beyond that time horizon, projections of housing and employment land requirements becomes increasingly unreliable as a basis for plan-making. Conversely, a longer term vision could make it more possible to establish the business case for larger-scale infrastructure improvements.

On balance, a 2036 time horizon is considered to remain appropriate in view of the scope of the local plan review. However, that does not preclude longer term visioning work being undertaken outside of the local plan review process. It should be noted that, in accordance with NPPF requirements, plan reviews will now be held at five year intervals.

Joint working governance

Some respondents commented that the governance arrangements for joint working are unclear. Some suggested a creation of a joint committee of the two authorities would be the best approach.

This issues was raised by the Home Builders Federation and Robert Hitchins Limited.

Officer response

The authorities have considered creating a joint committee to oversee joint working. The powers delegated to such a committee would be determined by the councils upon its creation. A joint committee is overseeing the preparation of the West of England Joint Spatial Plan. Other authorities, such as the Black Country authorities, are joint working but with decisions continuing to be made by the cabinets of the councils rather than being delegated to a joint committee.

In Wiltshire and Swindon the governance structure for joint working is:

- a joint planning officers' group of both councils meeting regularly,
- a joint members' working group comprising three cabinet members of each council meeting regularly to discuss joint working matters and make recommendations to the Councils' respective cabinets,
- decisions taken by the cabinets of the two councils at cabinet meetings.

It is considered that this structure remains appropriate and will enable effective ongoing joint working between the two councils on strategic issues.

Timetable

Concerns expressed that the timetable for plan-making is too short, is too ambitious and will be vulnerable to slippage.

Suggestions that it will not be possible within the timetable for the JSF to guide preparation of the local plans or the timetables for JSF and local plan preparation are not properly aligned.

These concerns were raised by Persimmon Homes, Robert Hitchins Limited and Redrow Homes South West, Hills UK Ltd, Cooper Estates Ltd.

Officer response

In light of changes to national planning policy, the local authorities have reviewed their proposed approach and plan-making timetable. An updated timetable will be published which is intended to be ambitious but realistic.

Site allocations

Redrow Homes South West, The Home Builders Federation and Robert Hitchins Limited suggested that the JSF should identify/allocate development sites to allow these to be tested early in the process.

Officer response

In order to comply with the Local Plan (England) Regulations 2012, a joint plan which identifies site allocations would need to be prepared as a statutory plan. As

identified above, it has been decided not to prepare a joint statutory plan. Site allocations will be made within the Councils' respective local plans.

Other neighbouring authorities

Wanborough Parish Council suggested Swindon Borough Council should be pursuing a joint spatial framework with Oxfordshire as well as Wiltshire. Others emphasised the importance of considering economic and housing linkages with other neighbouring areas beyond Wiltshire, in particular Oxfordshire (Wasdell Properties Limited, Swindon Gospel Trust, One Swindon).

Officer response

The consultation focussed on the approach to joint working between Swindon Borough Council and Wiltshire Council. However, It is correct that joint working will also take place with authorities beyond the county of Wiltshire on strategic matters with cross-border significance. It is unlikely that such joint working will involve the preparation of a joint strategy or plan with those neighbouring authorities, but a statement of common ground on cross-border issues is likely to be prepared.

Changes to government policy

It was suggested that the JSF could meet requirements for a statement of common ground to avoid two processes. Also, the authorities should monitor changes to government policy. (Swindon Gospel Trust, Kingsdown Nurseries, One Swindon).

Officer response

Joint working will meet the requirements of a statement of common ground. The authorities will continue to monitor and respond to changes to government policy.

Question 2:

Do you agree with the proposed objectives for the Swindon and Wiltshire JSF as set out below? If not, please describe how they should be changed.

The following principal issues were raised:

Objective prioritisation

CPRE asked if the objectives were ordered by priority.

A number of respondents stated that it is important for there to be a holistic assessment of the objectives, striking an appropriate balance between competing objectives. This point was raised by Gladman Developments, Home Builders Federation, Taylor Wimpey Strategic Land Robert Hitchins Limited, Swindon Gospel Trust, Kingsdown Nurseries, One Swindon.

Officer response

The relevance of the objectives is being reviewed in light of changes to government policy. The ordering of the objectives did not suggest a prioritisation and a holistic assessment and balance striking was envisaged.

Additional objectives

CPRE suggested a non-coalescence objective to protect communities separate character and identities in order to be resilient.

CPRE and Robert Hitchins queried the absence of reference to climate change.

Corsham Institute and Longleat Enterprises suggested specific additional objectives supporting the digital, knowledge and lifelong learning sector and the leisure and tourism sector.

Officer response

The relevance of the objectives is being reviewed in light of changes to government policy. In assessing the landscape impacts of development, coalescence is an issue that would need to be considered. In some areas coalescence could represent significant harm to landscape character or visual impact, in other areas less so. The issue was adequately covered by the environmental objective. Therefore, it is not considered appropriate to make non-coalescence a specific objective.

Planning responses to climate change would be adequately covered by other objectives which promote e.g. making effective use of land, avoiding increased risks of flooding, maximising public transport and active travel.

While the digital economy, leisure and tourism are important sectors, it is not felt appropriate to specifically reference these sectors in an objective.

Amendment to JSF housing objective

A number of respondents suggested changes to objective 1, these included:

- The objective should be framed to allow for full consideration of all potential options as the Local Plans subsequently evolve, particularly if all of the housing need cannot be met within the Housing Market Area.
- The objective should reflect consideration of the potential for new settlements.
- The objective does not identify the need to tackle affordability, increase the delivery of affordable housing, positively support the maintenance of a rolling five year housing land supply, the need to meet the housing needs of an ageing population and the need to support economic ambitions.

- Wording should be amended to meet paragraph 49 of the NPPF in that each HMA should meet in full the Objectively Assessed Needs for market and affordable housing.

A number of respondents suggested the need for a review of the role, function and relationship of settlements and their capacity for growth should be reviewed including their potential to change with improved infrastructure. This issue was raised by Home Builders Federation, Redrow Homes South West, Robert Hitchins Ltd, Persimmon Homes, Crest Nicholson.

Officer response

The relevance of the objectives is being reviewed in light of changes to government policy.

Amendment to JSF economy objective

A number of respondents suggested changes to objective 2, these included:

- There should be a cross reference to the objectives of the Swindon & Wiltshire Local Enterprise Partnership (LEP) Strategic Economic Plan (SEP)
- The objective should support the local, district and county wide economy. The should specifically refer to supporting existing businesses and sectors.
- One respondent suggested that the objective be reworded to: ‘Set out a clear economic vision and strategy for each FEMA which positively and proactively encourages sustainable economic growth and supports the roles of existing Town Centres.’
- Tourism needs to be identified as a major economic factor.
- The objective could be reworded to take a more holistic approach to employment by recognising the value non B Class Uses play in the economy.
- One respondent commented that there is a need now for warehousing and distribution near transport hubs but the service industries and other jobs can be part of mixed development, and the objective should reflect this.
- The objective should reference allocating new employment land in locations that are preferred by the market and attractive to commercial occupiers.

Swindon Pressingly Ltd (BMW Group) and Wasdell Properties suggested the objective should highlight the potential of improving economic connectivity not just within the Swindon and Wiltshire sub-region, but with other areas such as Oxford and the A420 corridor. The preparation of a cross-boundary Framework

represents an ideal opportunity to foster infrastructure and economic links to the wider area.

Officer response

The relevance of the objectives is being reviewed in light of changes to government policy.

Joint working will consider cross-boundary economic issues, including links with Oxfordshire.

Amendment to resilient communities objective

The recognition of the potential for developments to deliver new infrastructure, facilities and services was broadly supported.

There were a number of suggested amendments to this objective, including:

- Redrafting the objective to: “manage patterns of growth to make the best use of existing and enhanced infrastructure and then ensure that new development supports strong, vibrant and healthy communities” in accordance with the NPPF para 7.
- Refer to protection of communities’ separate character and identities.
- The objective should reflect that a more flexible approach to development in the rural areas may be needed following a review of the settlement hierarchy.

There were concerns raised about the use of the word ‘resilient’: the definition of a resilient community is broader than that provided in the objective, and the word resilient should be deleted as it is not defined or clear what is meant.

Officer response

The relevance of the objectives is being reviewed in light of changes to government policy. We agree that it is insufficiently clear what the term ‘resilient’ means in this context. The objective could be re-framed as about infrastructure.

Amendment to environment objective

There were a number of suggested amendments to this objective, including:

- More reference to climate change and air quality needed
- Another respondent suggested removing ‘...specifically nationally designated landscapes, heritage and biodiversity assets, air quality and the best agricultural land’ from the objective.

- One respondent stated that “respecting and enhancing agricultural land” would be contrary to NPPF paragraph 112, which only requires particular land to be taken into account.
- Another respondent suggested environmental factors should not prevent JSF and associated Local Plans from providing a positive framework for sustainable economic growth. Conversely another respondent felt that that the objective should be stronger.

Officer response

The relevance of the objectives is being reviewed in light of changes to government policy. There was disagreement among respondents with some seeking a weaker environmental objective which is subordinated to promoting housebuilding and others seeking a stronger objective.

Amendment to accessibility and transport objective

There were a number of suggested amendments to this objective, including:

- The objective should fully reflect Paragraph 32 of the National Planning Policy Framework, which indicates that improvements should be undertaken within the transport network that cost effectively limit any significant impacts of a development and that development should only be prevented or refused on transport grounds where the residual cumulative impacts are severe.
- There were a number of representations which disagreed with the objective’s approach to out-commuting. It was argued that commuting should not be seen as a negative factor to be prevented as this could impact the local and county wide economy. It was suggested that public transport should follow the trends evident in terms of commuters to reduce car reliance. It was recommended that the objective should be redrafted such that it places greater emphasis on providing new infrastructure and public transport opportunities, which better integrate the identified economic centres with their hinterland settlements, regardless of local authority boundaries.
- One respondent recommended the objective be amended “to ensure that housing and other development needs are provided for in the most sustainable ways, taking advantage and where necessary improving transport infrastructure and services, to ensure that the development strategy makes effective provision for the most sustainable modes of travel to play the fullest possible role”.
- A connection to Objective 2 should be made highlighting the importance of delivering infrastructure which serves existing businesses and facilitates economic growth.
- Limitations within existing infrastructure should be addressed.

- Economic connectivity within the Swindon and Wiltshire sub-region, and other areas such as Oxford and the A420 corridor should be referred to.

The absence of reference to the Local Transport Plan and any review of it was highlighted.

Officer response

The relevance of the objectives is being reviewed in light of changes to government policy. It would not be necessary to paraphrase national policy in this objective as suggested by some respondents. In response to the suggestion that the objective should be based on improving transport infrastructure, rather than seeking to manage patterns of land use to reduce commuting, it should be remembered that local authorities often do not have direct control over transport improvements. It would therefore be appropriate in the first instance to seek to reduce the need to travel, this is the approach sought by government policy (see NPPF para 103 and 104).

Question 3:

The Swindon and Wiltshire Strategic Housing Market Assessment (SHMA) presents technical evidence of the projected level of housing needs in the period 2016 to 2036. Do you have any comments on the findings of the SHMA?

Use of standard method

Paul Newman New Homes, Stagecoach, Nathan McLoughlin JSFIPSBC49 supported for the findings of the SHMA and cautioned against bringing the housing target into line with the Governments September 2017 Draft Methodology as this sees a notable reduction in housing in Swindon Borough and a very modest increase in Wiltshire as a whole at best.

Others suggested that the council needs to respond to the standard method and make clear whether they intend to use it or pursue its own evidence base.

Others suggested the potential to use the standard method but with flexibility for uplift to meet economic aspirations.

Officer response

Under the new NPPF the local authorities would need to demonstrate exceptional circumstances as to why the standard method for calculating Local Housing Needs should not apply and why a locally distinctive method should be used instead. It is therefore the intention of the authorities to use Local Housing Needs as the starting point for the plan reviews, in accordance with government policy. Swindon Borough Council will consider whether an uplift to the standard method figure is needed in light of economic growth projections.

Higher housing number

Gladman, Homebuilders' Federation, Redrow Homes, Robert Hitchens, Persimmon, Kingsdown Nurseries, One Swindon suggested the need for a higher housing number than the SHMA number for the Swindon HMA in order to support economic growth and the delivery of affordable housing.

Officer response

The standard methodology is adjusted to take account of local affordability ratios. Swindon Borough Council will consider whether an uplift to the standard method figure is needed in light of economic growth projections or affordable housing need.

Unmet housing needs

The HBF sought clarity as to whether unmet needs from one of the HMAs identified in the SHMA would be met in another.

Stagecoach stated that that scope to meet housing needs from Bath and North East Somerset in Wiltshire should be considered.

MacTaggart & Mickel Strategic Land observed that Parts of Gloucestershire and Vale of White Horse are also part of Swindon HMA.

Officer response

The distribution of housing within Wiltshire is a matter for Wiltshire Council. It will be determined whether or not there are 'unmet needs' from Swindon Borough Council that would need to be delivered in Wiltshire or vice versa.

The existence of unmet needs from neighbouring authorities will also be considered.

Question 4:

The Functional Economic Market Area Assessment (FEMAA) presents technical evidence of the projected level of need for employment land in the period 2016 to 2036. Do you have any comments on the findings of the FEMAA?

Jobs requirement too low

Webb Paton, Paul Newman New Homes, Taylor Wimpey, Homes and Communities Agency, Wasdell Properties Limited, and WebbPaton made the argument that the hobs projections for the Swindon FEMA should be higher. The argument was made that more employment land should be allocated in the Swindon area.

Officer response

Planning for the highest available jobs projection may not be realistic in light of evidence of slower jobs growth in Swindon Borough, non-delivery of employment development, and the uncertainties surrounding the economic impact of Brexit. The NPPF states that plans should be aspirational but deliverable.

Jobs targets too high

Persimmon Homes stated that the level of employment land allocated in Swindon Borough Local Plan excessive compared to growth not projected. Jobs growth has been low.

Officer response

It is noted that there is a difference of opinion among respondents as to whether the evidence on jobs growth is too low or too high. Evidence on job growth will be reviewed.

Economic connections with other areas

Wanborough Parish Council and Wasdell Properties Limited highlight that over a third of FEMA is in Oxfordshire and Gloucestershire indicating a need for direct cooperation with these areas and the Swindon/M4 Corridor FEMA is eastward facing.

Officer response

It is agreed that there is a need to cooperate with Oxfordshire and Gloucestershire in planning for employment land.

Alignment of jobs and housing

Housing land promoters/developers Gladman Developments and Persimmon Homes highlighted to need to align strategies for jobs and housing. The HBF stated that a low housing target would not support jobs growth.

Officer response

Noted. The updated PPG does not retain wording about balancing jobs and workers. Nevertheless, the relationship between the requirements for housing and employment land will be considered.

Question 5:

Do you consider that the methodology proposed in the programme of work to test the sustainability of delivering the scales of growth in each Housing Market Area and each Functional Economic Market Area is robust? If not, in your response please explain why.

Review the role of settlements

The role, function and relationship of all settlements should be reviewed (Gladman, Redrow).

CPRE suggest the different roles of market towns and rural settlements should be respected. Purton Parish Council suggest that consideration should be given to the impact of development on congestion on rural roads.

Officer response

In determining development strategy options Swindon Borough will consider the potential role of rural settlements.

Clarify relationship between the JSF and Local Plan review

Some respondents suggested the process is unclear, too onerous and there is a lack of clarity about how the JSF would inform the Local Plan reviews (Robert Hitchins, Persimmon, Swindon Gospel Trust, Kingsdown Nurseries, One Swindon, WebbPaton).

Officer response

The timetable and approach to plan making has been reviewed in light of changes to national policy.

Assessment is too environmentally orientated

Concern expressed by some development interests that the proposed approach to the assessment of options is too environmentally orientated and could reduce scope for future town expansion. Also a suggestion that the location of employment land would need to be determined by market preferences not environmental or sustainability considerations (Taylor Wimpey Strategic Land, Nathan McLoughlin, Wadsell Properties).

Officer response

Officers remain of the view that environmental constraints and environmental sustainability are important. The attractiveness of employment locations to the market will be taken into account.

Question 6:

The Housing Market Area Profiles present the current Plan's vision for each settlement based on its role and function. Do you think this should change? Please tell us which settlement(s), and explain your answer.

A more detailed study should be undertaken on each settlement in the Swindon HMA rather than being restricted to the main settlements (WebbPaton).

Respondents suggested that the spatial vision should support planning for key infrastructure (Mactaggart & Mickel Strategic Land, Swindon Gospel Trust).

- Specific comments were made on locations for future development, including:
- Suggesting that development is focused on towns with rail stations/road links (WebbPaton)
- Suggesting that market towns and rural settlements need affordable/social rented housing and small-scale employment hubs (CPRE)
- Suggesting development of employment areas south of M4 motorway (CPRE)
- Suggesting using unused employment land for residential use (Homes and Communities Agency)

Question 7:

For each settlement identified in the Housing Market Area Profiles there are also a number of key findings and issues identified. Do you think these are correct and how should the Councils respond to the questions raised? Please tell us which settlement(s), and explain your answer.

Issue 1: Deliverability

Was a frequently raised issue. One respondent states that SBC should be “positive in their approach to bringing forward small sustainable sites either within or on the edge of Swindon town” to improve delivery. Issue raised by Paul Newman New Homes, Taylor Wimpey, Hills UK, Cooper Estates Strategic Land, Swindon Gospel Trust, Homes and Communities Agency, Kingsdown Nurseries, One Swindon.

Issue 2: Future growth

A number of respondents focussed on the issue of how Swindon should grow in future. A number of developer or landowner respondents identified “west of Swindon” as an area for growth. One respondent suggests development of Swindon’s “market towns and villages”. Others suggested Royal Wootton Bassett (WebbPaton, Taylor Wimpey) or Purton (Taylor Wimpey) as development locations for Swindon.

Some suggested an update to the settlement hierarchy (Gladman Developments, Home Builders Federation). Conversely, one respondent suggested the need to protect community identity/character (CPRE) and concern was expressed about over-development of settlements nearby to Swindon (Purton Parish Council).

Issue 3: Infrastructure

A number of comments were made about the need for infrastructure to support development (Purton Parish Council, Paul Newman New Homes, Mactaggart & Mickel Strategic Land, Swindon Gospel Trust, Mplanning) One respondent says that Swindon “needs should be accommodated close to existing recent urban extensions where the relevant infrastructure can be utilised and enhanced”.

Question 8:

Are there any specific development constraints that you think should be taken into account in the preparation of the Joint Spatial Framework that have not been identified in the Housing Market Area Profiles?

Constraints/obstacles highlighted included:

- Unsuitable/unviable sites (WebbPaton)
- Coalescence of neighbouring settlements (particularly to the west) (Purton Parish Council, Crest Nicholson)
- Differences in political views (Mactaggart & Mickel Strategic Land, Taylor Wimpey)
- The proposed status of the JSF as a non-statutory document (Taylor Wimpey)
- Physical and technical constraints (e.g. floodplains, SSSI, heritage assets, landscape sensitivity) (Mplanning, Wasdell Properties Ltd) although one respondent suggested that a review of such constraints is necessary (Mplanning).
- “Essential setting” of Lydiard Park
- The M4 motorway (Crest Nicholson, Wasdell Properties Ltd.)
- The North Wessex Downs AONB was suggested to mean no significant housing allocations could be made to the south of the M4 (Crest Nicholson)
- Lack of ease of access to the M4 for employment sites north of Swindon (Wasdell Properties Ltd)
- The need to provide suitable types of housing for different groups of people (CPRE)
- One respondent suggested that an overarching holistic assessment of all HMA constraints is needed (Swindon Gospel Trust)

Question 9:

Are there any specific development opportunities that you think should be taken into account in the preparation of the Joint Spatial Framework that have not been identified in the Housing Market Area Profiles?

Supporting Swindon & Wiltshire LEP to regenerate existing economic areas was suggested to be an opportunity (CPRE) while another respondent emphasised the opportunities presented by brownfield sites (Purton Parish Council)

One respondent suggested that provision of a better cycling network is a development opportunity (Swindon Bicycle User Group)

A number of Specific sites were suggested, including:

Bremhill Farm (Paul Newman New Homes), Land off Station Road, Purton (Taylor Wimpey), Land at Day House Lane, Commonhead (Hills UK) Cheney Manor Road (Swindon Gospel Trust), Blunsdon (Swindon Gospel Trust), Land north-east of Blunsdon at Upper Burytown Farm (WebbPaton), Land north of Kingsdown Lane just east of Ermin Street (WebbPaton), Inlands Farm (strategic science park employment site) (WebbPaton, Wasdell Properties

Ltd.), Day House Farm (Humberts), The Gateway North (Homes and Communities Agency), Tadpole Garden Village (Crest Nicolson), Kingsdown Nurseries (Kingsdown Nurseries), The Sidings (One Swindon), Thamesdown Drive (Mplanning), West of Swindon (Mactaggart & Mickel Strategic Land, WebbPaton),

Question 10:

Do you have any comments on the advantages or disadvantages of any of the following concepts for growth alone or in combination? Are there other options not considered? Please explain your answer by reference to a specific Housing Market Area or settlement.

Urban capacity of Swindon

Considerable support was expressed for growth at Swindon. One respondent suggested it is in the interests of overall sustainability to deliver new housing and employment allocations in the vicinity of Swindon to take advantage of the primary infrastructure that does exist (e.g. M4).

Others cited Swindon's economy as a reason for growth there. Some suggested it is easier to integrate housing, economic and transport development at Swindon.

Others suggested Swindon is more suitable as a location for development than the rest of Wiltshire due to the latter's rural nature and poor transport links.

Issue raised by WebbPaton, CPRE, MacTaggart & Mickel Strategic Land, Purton Parish Council, Kingsdown Nurseries, One Swindon.

Urban extensions

Some opposition was expressed to further urban extensions in view of their potential to be delayed causing housing land supply shortfalls.

Others stated that new urban extensions will be required and represent the best option for sustainable development.

Transport based development

Some support for this option. For example in terms of its potential to reduce congestion on rural roads (Purton Parish Council).

Suggestions that there are opportunities for providing better connections for cycling between Swindon and its outlying settlements such as Shrivenham, Royal Wootton Bassett, Highworth, Wroughton, Chiseldon, South Marston, Wanborough, Broad Blunsdon (Swindon Bicycle users group).

More development at larger, better served rural settlements

Some objection to this option on the basis that larger settlements are better locations due to infrastructure availability.

Considerable developer support, including on the basis that it would work well alongside existing planned urban extensions. Specific locations, such as Purton, suggested.

Suggestion this could provide choice to house buyers and that there are locations accessible to the employment and services.

New settlements

Limited support. One respondent stated “Perhaps, depending on how, where, the access, deliverability”.

Another observed that “New settlements still need to be placed around good existing infrastructure such as the M4, urban centres and railway stations”.

Another suggests it is an inappropriate solution.

Other options – a combination of spatial options

Some respondents suggested a hybrid approach e.g. a wide range of sites adjacent to sustainable settlements to complement existing urban extensions and a balanced approach across all of the proposed options to ensure that small and medium sized developers can establish themselves within the market, in addition to the large volume housebuilders. One responded stated “Options 1-4 represent sound planning logic and should be considered in combination.”

Others supported a broad portfolio of housing sites (different sizes, locations and market types). Another suggested the council should consider allocating both large (ie 1,000-4,000 dwellings plus), medium (200-1,000 dwellings) and small (less than 200 dwellings) in various strategic locations. This allows the council to be in control of their Local Plan.

Other suggested focus should be placed on increasing the number of sales outlets available by increasing the number of housing site allocations.

Another respondent suggested Swindon should be the focus for urban growth with further urban extensions and smaller scale more immediate developments.

A hybrid approach was suggested by: Gladman, Home Builders Federation, Robert Hitchins, Persimmon, Swindon Gospel Trust, Kingsdown Nurseries, One Swindon, WebbPaton.

Historic England highlighted the importance of heritage-led regeneration.

Question 11:

Do you have any further comments to make on the proposed Joint Spatial Framework or matters raised in this paper?

A number of responses to this question raised issues considered above under other questions:

- The time-horizon for the plan (suggestions that this should be extended or there should be a long-term vision.
- Questions about the timetable for plan making and suggestions it should be reconsidered.
- The view that there should be a joint statutory plan between Wiltshire Council and Swindon Borough Council
- The need to clarify the project plan for joint working and the relationship between the Local Plans and proposed JSF.
- The importance of cooperation with other neighbouring authorities.

Water infrastructure

Thames Water commented on the importance of planning strategically for the provision of infrastructure for water supply and wastewater, and taking into account the capacity of existing infrastructure. They suggested that the Joint Spatial Framework should include a separate policy covering the provision of “Water Supply and Sewerage/Wastewater Infrastructure” along the lines of the following:

Developers will be required to demonstrate that there is adequate water supply, waste water capacity and surface water drainage both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing water and/or waste water infrastructure. Drainage on the site must maintain separation of foul and surface flows. Where there is an infrastructure capacity constraint the Council will require the developer to set out what appropriate improvements are required and how they will be delivered.” Supporting text for such a policy was also suggested.

Thames Water also suggested that any flood risk sustainability objectives within the JSF should also make reference to ‘sewer flooding’ and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure is not in place ahead of development.

Officer response

The proposed policy wording will be considered for inclusion in the Local Plan review.

Appendix 2

Local Plan Review Consultation Themes

Question 1 (cross-boundary issues):

Are there any cross-boundary planning issues that the Council should consider in preparing the Local Plan Review? If so please provide details.

Cross Boundary Issues

Cross boundary issues identified included:

- Housing
- Economic development
- Infrastructure including:
 - Transport Infrastructure
 - Sports facilities
 - Waste and water facilities
 - Healthcare facilities
 - Education facilities
- Non coalescence of settlements

Joint working with Wiltshire

The need to work with Wiltshire on cross border issues was frequently raised, notably on issues such as infrastructure, housing and employment development.

A number of respondents raised concerns that the administrative boundary of Swindon acts as a barrier for strategic growth, and suggested that this needs to be addressed collectively with its neighbours, most notably Wiltshire. A number of developer or landowner respondents identified “west of Swindon” as an area for growth and the need to work jointly with Wiltshire on this. Conversely, one respondent supported the position that both Swindon and Wiltshire do not need to be supported by development outside of their administrative boundary.

A number of respondents raised that the Local Plan Review needs to be clear where the Community Infrastructure and Section 106 payments will be made to benefit both Councils should any development be required in Wiltshire to support Swindon.

A number of respondents raised issues with regards to the Joint Spatial Framework. Whilst joint working with Wiltshire was broadly supported, a number of comments were raised about the approach, as follows:

- Similar to responses on the Joint Spatial Framework Consultation, a number of respondents commented that there should be a joint statutory plan between Wiltshire Council and Swindon Borough Council
- The relationship between the Swindon Local Plan Review, the Swindon & Wiltshire Joint Spatial Framework and the Wiltshire Local Plan Review is unclear

Officer response

We agree with the list of cross-border issues highlighted.

A number of the comments raised in relation to joint working with Wiltshire Council overlap with issues raised in response to the JSF consultation and are responded to above. Joint working will be undertaken with Wiltshire Council where development proposals raise cross border infrastructure implications.

Cross boundary working with other Local Authorities

A number of respondents emphasised the importance of greater cooperation on issues such as transport, education, infrastructure delivery and healthcare with other neighbouring areas beyond Wiltshire, in particular Oxfordshire (Oxfordshire County Council, Swindon CCG) Vale of White Horse, and Gloucestershire (Wanborough Parish Council).

Others commented on Swindon's economic role within the Thames Valley Corridor and the importance of considering this through the Local Plan Review (Thames Valley Chamber of Commerce, Kingsdown Nurseries, Swindon Gospel Trust, One Swindon).

Officer response

Joint working will also take place with authorities beyond the county of Wiltshire on strategic matters with cross border significance. It is unlikely that such joint working will involve the preparation of a joint strategy or plan with those neighbouring authorities, but a statement of common ground on cross-border issues will be prepared.

Questions 2 and 3 (vision):

Do you agree with the Vision for the Local Plan Area?

Please suggest any changes that you think should be made to the vision for the Local Plan Review.

The majority of respondents agreed with the Vision, or broadly agreed with some suggested amendments (covered below).

Two respondents (Hannington Parish Council, Town and Country Planning Services) commented that they do not support the vision as it is too focussed on the town of Swindon and neglects the rest of the Borough. Further comment was made by Town and Country Planning Services on the use of the term 'Swindonian', and that it suggests that the spatial vision relates only to those people born in the Borough. It is suggested that a more appropriate term would be "resident".

Amendments to Vision

Of those that broadly agreed with the Vision, suggested amendments included:

- Stronger reference required to creating healthy and sustainable communities, (Swindon CCG, Sport England, SBC Public Health). Reference to inclusive design of the built environment was also suggested. SBC Public Health commented that there could be reference to the Health and Wellbeing Strategy.
- Stronger focus on the Town Centre and its regeneration (CPRE – Wiltshire, FI Real Estate Management (FIREM), UK Commercial Property Trust (UKCPT)). Refer specifically to the need to promote, enhance and protect the Town Centre as a retail, business and leisure destination, as well as promoting residential in the centre. One respondent suggested adding the following text (underlined): 'Swindon's town centre will experience improved levels of vitality and viability and will be the focus for new retail, leisure and office investment, and the achievement of a high quality public realm in the heart of the town linked to the countryside will provide a real focal point for visitors and Swindonians alike'.
- Support for the transition to a low carbon future and clean growth economy should be specifically articulated. One respondent commented that the Vision should set a target date of 2040 for Swindon to be a carbon neutral town.
- Greater emphasis on making the Borough an attractive place to live and work (Swindon CCG).
- Commitment to retain the separate identity of villages and towns within the Borough.
- Take into account the road and rail infrastructure
- The Vision should cover the part of Swindon that may be developed within Wiltshire administrative area if not the whole of the Housing Market Area (HMA)
- The Vision should look further ahead to 2050
- There should be reference to meeting development needs for employment and housing in full
- Consider Swindon in its wider setting and refer to connectivity with the Oxford-Cambridge arc or eastwards along the M4 corridor and the strategic transport infrastructure that is needed to achieve this
- Whilst it was commented that the part of the Vision that states 'as an attractive and flexible location for existing and new businesses, Swindon will become one of the best business locations in the UK' was ambitious, it was suggested that it should adequately reflect the importance placed upon economic growth, whilst recognising the needs to proactively support the

existing employment sector and key employers. It was also suggested that it should be realistic and set with clear, identifiable and measurable performance targets.

- The JSF should be cross referenced.

Officer response

The vision will be considered in light of the comments.

Questions 4 and 5 (objectives):

Do you agree with the objectives for the plan area?

Please suggest any changes that you think should be made to the objectives for the Local Plan Review.

The majority of respondents supported the existing objectives, or broadly supported with some suggested amendments (covered below).

A number of respondents however commented that the objectives were out of date and should be reviewed in line with national policy and the JSF (WebbPaton Clients, Gladman Developments, Home Builders Federation, Hannick Homes) . Of those that commented that the objectives should be reviewed, there were also concerns expressed regarding the following:

- none of the current Strategic Objectives refer to planning for meeting the challenge of climate change and flooding
- lack of commitment to long term strategic planning for infrastructure delivery and the long term direction of growth

Amendments to Objectives

Of those that broadly agreed with the Vision, suggested amendments included:

- Greater emphasis on Town Centre regeneration. UKCPT and FIREM suggested adding an objective which seeks to promote, enhance and protect Swindon Town Centre as a retail, business and leisure destination, as well as promoting residential in the centre. The following worded was suggested: to enhance the health and attractiveness of Swindon's town centre through the attraction of new investment and directing all major retail and leisure development to this area
- Further linking the objectives with health and wellbeing, including designing out frailty and designing for healthy weight environments (SBC Public Health). One respondent commented that 'Objective 6 – Community and Health' should be amended to account for air pollution, and to include the following text: 'to comply

with World Health Organisation air quality guidelines at all times everywhere in the Borough'

- Within 'Objective 2 – Infrastructure' emphasis should be given to ensuring the road network is in place before development begins (Wanborough Parish Council).
- 'Objective 4 - Housing' should be expanded to specifically reference brownfield sites. The following text was suggested: 'to meet the Borough's housing needs by the provision of well-designed sustainable housing, at sustainable locations and at a range of types and densities according to local needs and circumstances, and that promotes the effective use of land, with a particular focus on Swindon's previously developed (brownfield) sites for delivering housing.' (Nationwide Building Society).
- 'Objective 4 - Housing' should be amended to include "in full" when referring to the intention to meet identified housing needs.
- Add in new objective 'to ensure Swindon becomes a carbon neutral town by 2040.'

Officer response

The continued need for and content of the objectives (as distinct from policies) will be reviewed in light of changes to government policy and the need to local plans to be succinct.

Objective Prioritisation

Capital Land Property Group stated that objectives 4 (Housing) and 1 (High Quality Sustainable Development) should be the top two, given delivery issues in the past.

Officer response

It is not likely to be appropriate to provide an over-arching objective prioritisation in this way.

Questions 6 and 7 (settlement hierarchy):

Should the settlement hierarchy for the Borough as defined above be carried forward into the Local Plan Review? Please provide any further comments.

Are there any settlements you think should be moved further up/down the hierarchy? Please indicate which settlements and give reasons.

A considerable number of respondents expressed support for the existing hierarchy. In particular, there was support for prioritising Swindon as the primary focus for development within the hierarchy.

A number of respondents suggested a review of the existing hierarchy.

Evidence base

One respondent suggested that a survey of all settlements providing an overview of existing services and facilities should have been published as part of the review of the Local Plan. SBC public health questioned how the hierarchy was arrived at.

Officer response

The hierarchy will be reviewed as part of the local plan review.

Add additional tier

There were some suggestions for an additional tier in the hierarchy:

- The Bicycle User Group (BUG) suggested a new level in the hierarchy between current levels 2 and 3 for settlements large enough to benefit from improved access to cycle and walking networks and the villages of Chiseldon, South Marston, Wanborough and Broad Blunsdon suggested for this level.
- Hannington Parish Council suggested splitting the third tier into two tiers to differentiate between the development potential of the villages currently within tier 3, as the current tier 3 makes no mention of the character of the villages.

Officer response

We will consider introducing an additional tier into the settlement hierarchy.

Movement of settlements to other tiers

A number of respondents commented that some settlements should fall under a different tier within the hierarchy:

- Thomson and Partners and Town and Country Planning suggested that smaller settlements with a basic level of services should be included within Level 3 to ensure long term sustainability. The examples of Castle Eaton (Thomson and Partners) and Upper Inglesham (Town and Country Planning) were given.
- One respondent suggested development should not be encouraged at Highworth as it is not accessible for people without the use of a car.
- Capital Land Property Group, CPRE, Swindon Gospel Trust commented Broad Blunsdon should be elevated to a Level 2 settlement in recognition of its functional relationship and proximity to Swindon, the services and facilities available.
- Hannington Parish Council suggested that Hannington should move down a tier within the hierarchy and is only suitable for small scale development

Officer response

The settlement hierarchy will be considered as part of the local plan review

Flexibility

Two respondents (Church Commissioner for England, Home Builders Federation) commented that the hierarchy needs flexibility within each level, particularly in the rural areas, to ensure that the delivery of new homes/commercial development is not too restricted. Hannick Homes also suggested a more flexible approach to the contribution that large villages within the Borough of Swindon, such as Chiseldon, can make to contributing to housing need should be considered.

Officer response

The purpose of a settlement hierarchy is to support a sustainable development strategy. A very flexible policy would not manage patterns of development, as the NPPF requires local authorities to do.

Application of hierarchy across HMA

A number of respondents (MacTaggart & Mickel Strategic Land, Taylor Wimpey, Gladman and Hannick Homes) suggested that the hierarchy should be applied to the whole of Swindon HMA. It was suggested that second tier settlements will be: Royal Wootton Bassett, Marlborough, Purton, Cricklade, Ramsbury, Aldbourne and Lyneham, whilst some third tier settlements would be Lydiard Millicent and Hook.

Officer response

We will review this suggestion in light of changes to government policy, this may now not be appropriate.

Hierarchy not effective

One respondent commented that due to the lack of a 5 year housing land supply, the hierarchy is ignored by developers and applications are approved for development at third tier settlements that can support limited development. The example was given of Blunsdon.

Officer response

We agree, in the absence of a five year housing land supply, government policy means that the Local Plan settlement hierarchy is given less weight.

Water Infrastructure

Thames Water commented that they have significant concerns regarding Wastewater Services in the Swindon and Wroughton settlements. Specifically, the

wastewater network capacity in these areas is highly unlikely to be able to support the demand anticipated from large scale development.

Officer response

Swindon Borough Council will work with Thames Water to understand how waste water capacity should be factored into plan making.

Question 8 (spatial principles):

Are there any other important spatial principles that should guide the development strategy in the Local Plan Review? Please provide details.

Location of development

It was commented that previous Local Plans had focussed on Swindon, and smaller sites should be identified at existing settlements (Town and County Planning). However, a number of respondent commented that development should continue to be focussed at or adjacent to the settlement boundary of Swindon (Swindon Gospel Trust, Kingsdown Nurseries, One Swindon, Linden Homes, Highways England).

A number of respondents commented that the Local Plan should promote development in locations that are or can be made sustainable with regards to transport, that allow for the uptake of sustainable transport modes, e.g. bus corridors and rail stations (Highways England) and walking and cycling provision (Bicycle Users Group).

Taylor Wimpey commented on the constraints to the north, south and east of Swindon suggest that further development should be located to the west/north west of Swindon outside the administrative boundary.

A number of respondents commented that brownfield central area sites should be prioritised first.

Officer response

The comments received will be considered in determining where the additional housing and economic growth to 2036 should be accommodated.

Site size

A number of respondents commented on the delay in the delivery of the large strategic allocations, and that the plan needs to allocate a number of smaller sites to deliver housing in the short term.

Highways England commented the sites and the scale of development identified in the Plan should not be subject to such infrastructure requirements that their ability to be developed viably is threatened.

Officer response

Government policy now requires 10% of the requirement to be met on sites of 1 hectare or less in area. This will need to be followed in the local plan review.

Balance of economic, social and environmental dimensions

A number of respondents commented that in order to achieve sustainable development the plan needs to balance economic, social and environmental objectives.

Officer response

This reflects national policy.

Spatial principles should be shared with Wiltshire

A number of respondents commented that the spatial principles should reflect those within the Joint Spatial Framework. GWE Business West commented that Swindon's growth ambitions should be matched with Wiltshire.

Officer response

Sharing Local Plan spatial principles with Wiltshire is unlikely to be appropriate in view of the different character of the two areas.

Infrastructure

Wanborough Parish Council and Highways England commented that the Plan needs to take into account infrastructure requirements and how this can be delivered in a timely way for any allocations that come forward.

Officer response

We agree and the NPPF also emphasises the importance of this.

Question 9 and 10 (strategy options):

How should the plan balance the short term need for additional housing with the longer term development strategy for the area?

Are there any specific or broad locations that you think may be suitable to accommodate housing development? If so, please provide details explaining your reasons.

As with question 8, there was support expressed for the allocation of small or (in the case of some respondents) medium sized sites including in rural areas (Church Commissioners, Thomson and Partners, Webb Paton, Capital Land, Castlewood Commercial Properties, Town and Country Planning Services, Hannick Homes, HBF). Others felt small sites would help smaller developers or supported the

Council developing small sites (local residents). One respondent raised concerns about short-term housing sites in small villages (Hannington Parish Council).

Others (such as Swindon Chamber of Commerce, Taylor Wimpey) raised concerns about the plan time horizon, seeking a longer-term plan

Responses from developers/landowners promoted sites for development (sites in Wiltshire Council are excluded):

Location	Promoter
Land at School Close, Castle Easton, SN6 6LF for smaller scale housing	Thomson and Partners
Upper Burytown Farm, Blunsdon for up to 600 homes	Webb Paton
Land north of Kingsdown Lane for 200 dwellings	Webb Paton
Land west of the Cricklade to Swindon Railway and east of the River Ray in Haydon Wick for 125 dwellings	Webb Paton
Land east of Alexandra Park, Wroughton for 200 dwellings	Webb Paton
Land at Artis Farm, Wroughton for 300+ dwellings	Balmoral Land (UK) Ltd
Day House Farm	Carter Jonas
St Leonard's Farm, Broad Blunsdon	Capital Land
Oakfield Campus for 250-300 homes	Nationwide Building Society
Land north west of Chiseldon for 40 homes	Pegasus on behalf of Hannick Homes
Gateway North key employment area	Homes England
Land north of Tadpole Garden Village	Crest Nicholson
Land at Catsbrain Farm	Castlewood Commercial Properties Ltd
Land at Broadbush, Blunsdon	Turley for Swindon Gospel Trust
Land at Cheney Manor Road	Turley for Swindon Gospel Trust
Kingsdown Nurseries	Kingsdown Nurseries
Grove Farm, Blunsdon St Andrew	Turley for Linden Homes
Prebendal Farm, Bishopstone	Deloitte for Church Commissioners
Land West of New Town Lane, Bishopstone	Deloitte for Church Commissioners
Eastbrook Farm Buildings West of New Town Lane, Bishopstone	Deloitte for Church Commissioners
Land at Eastbrook Farm, Bishopstone	Deloitte for Church Commissioners
Hook Street, Lydiard Tregoze	Primegate Properties (Hooknorth) Limited
Lower Widhill Farm, Blunsdon	Strutt & Parker
Newburn Sidings between Wotton Bassett Rd and Park Lane	One Swindon

Others supported redevelopment of central areas (CPRE, residents).
GWE Business West favoured urban extensions to dispersed development at villages because of better access to employment.

Town and Country Planning Services suggested additional housebuilding at Highworth.

Specific sites suggested by residents/councillors:

- Central Trading Estate south of Newport Road, Old Town
- Council-owned park and ride site on Cricklade Road
- Northern gateway site next to Harvester
- Fields immediately adjacent to Tadpole Garden Village next to the schools.

Officer response

The submitted and suggested sites are noted and have been included in the Swindon Strategic Housing and Economic Land Availability Assessment

Questions 11, 12 and 13 (employment):

Do you consider that the current Local Plan policies are working to support the aims listed above [objectives in relation to employment land and sites provision, supporting growth sectors and supporting the role of centres and town centre regeneration]? Please provide further comments.

Do you have any views or suggestions for how planning policies should be used to promote economic growth and/or provide for a wider range of employment opportunities?

Are there any other sites you think may be suitable to accommodate business (office and industrial uses)? Please provide details.

Weak/ineffective town centre policies

CPRE felt current policies are weakly worded and too easily argued down. UK Commercial Property Trust similarly felt that Policy EC3 does not support town centre regeneration because it supports out of town development.

FI Real Estate Limited expressed concern that Policy EC3 fails to restrict out of town retail development and places restrictions on town centre units, to the detriment of the town centre's competitiveness. Specific concern were expressed about the policy seeking to protect the more widely drawn 'central area' rather than the town

centre and this undermining its effectiveness. Part (b) of the policy should be limited to small scale retail units. Part (c) of the policy is overly restrictive. A locally specific threshold for impact assessment of 500sqm should apply. The requirement for impact assessment should apply to other town centre uses, not just retail.

Officer response

We agree with some of these comments. The wording of Policy EC3 is being reviewed to ensure it is consistent with national policy, supports the role of centres and allows the town centre to diversify.

Slow central area regeneration

A number of respondents noted the slow pace of central area regeneration (Swindon Bicycle Users Group, resident) and the need to make the town centre attractive to live and visit. Wasdell Packaging Limited stated that the extent of the required regeneration is significant and will necessitate substantial government investments and subsidy to act as a catalyst for regeneration.

UKCPT state that the experience from the Central Area Action Plan and Local Plan documents is that site allocations alone cannot bring forward complex town centre development projects and further actions by the public sector are therefore required in order to assist with the delivery of investment projects.

Officer response

We agree as to the importance of town centre regeneration. Regulatory land use planning policies can create a supportive policy environment for town centre regeneration, but they cannot make it happen. Public and private sector investment is needed for regeneration to take place and continuing progress is being made on delivering regeneration in Swindon's centre.

Need for additional business parks

Wasdell Properties argue that many businesses will not consider a town centre location and have a preference for business parks with access to the strategic road network. They suggest that the new local plan should recognise this with suitable allocations of land.

Wanborough Parish Council highlight the lack of space for start-ups and SMEs which lead to businesses locating outside of the Borough.

Officer response

Officers will review the need to bring forward additional land for industrial and distribution uses as part of the plan review. With regard to offices, national policy continues to support a town centre first approach.

Economic growth is not just about the allocation of employment land

A respondent highlighted that the town needs to have the desirable housing, high educational standards, attractive public realm and lively cultural and leisure facilities to give firms confidence that if they set up in Swindon they will be able to get the staff they need to make their lives and raise their families here.

Wasdell Properties Limited also state that regeneration of the Central Area is vital if business perceptions of the town are to become more favourable (to say nothing of the societal benefits arising from an improved environment). This view is shared by a local resident who states that it should be recognised that a vibrant town centre is the key to economic success.

Officer response

Officers recognise that liveability and the improvement of the town centre are vital to the future economic prospects of the area.

Concerns about lack of employment

Stratton St Margaret Parish Council raise concerns about high level of housing building but lack of new employment creation leading to Swindon increasingly becoming a dormitory town.

GWE Business West state that it is important to identify additional employment land a view shared by others (Webb Paton, Wasdell Packaging, Thames Valley Chamber of Commerce).

A more cautionary note is sounded by some (Redrow Homes, Persimmon Homes) who note “Analysis of historical jobs change in the Borough shows that employment between 2000 and 2013 grew by no more than 0.1% per annum, substantially below the 1.1% p.a. growth figure for 2011-2026 assumed by the adopted Local Plan”. It is suggested that the adjusted labour demand scenario presented in the ELR represents a more realistic target for Swindon which would be well above historical growth trends.

The importance of non-B class employment uses is also highlighted including sport (Sport England) and supermarkets (Aldi).

Officer response

Officers recognise that jobs growth has not kept up with housing growth. The appropriate jobs growth scenario to use will be considered alongside the contribution of alternative uses.

Specific sites suggested for employment

Inlands Farm, Wanborough
Derelict urban sites in Dorcan
Junction 16 south of Wichelstowe for industrial or mixed office/industrial.
Land north of the A420 (part of the New Eastern Villages)
Land east of the A419 and west of The Marsh
Land south east of J16 off the Wroughton Road

Employment Land at Eastern Villages

Capital Land owns Great Stall East which is identified for some 900 dwellings, district centre and employment land in the adopted NEV Planning Obligations SPD. As set out above, effective delivery of the residential element of this allocation will be important to meet both the current adopted Local Plan requirements and those of the LPR to 2036. Detailed analysis of the land budget demonstrates that 10ha of employment land cannot be delivered in addition to the 900 dwellings. Therefore Capital suggests that the employment element be reduced to 2.5ha of B1 use-class employment given the other employment opportunities provided by the district centre. The employment allocation for New Eastern Villages as set out in Table 3 should therefore be adjusted to 32.5ha.

<i>Officer response</i> Noted.

Question 14, 15 and 16 (retail):

Do you consider that the current Local Plan and Central Area Action Plan policies for shopping frontages leads to a vibrant town centre or should the policy approach be altered?

Are there any town centre or edge of centre sites available that would be suitable for retail, leisure or town centre development?

Should we retain a lower threshold for impact assessments on retail proposals, alter the threshold, or rely on the national thresholds?

Retail frontages

One resident expressed support for more independent shops. Some respondents suggested the importance of a mix of uses including residential and food and beverage (CPRE, Taylor Wimpey, resident, UKCPT). A number of respondents noted that the dynamics of town centres are changing and suggested a less prescriptive approach (Swindon Chamber of Commerce, Aldi Stores Ltd).

FI Real Estate Management state that town centre frontage policy places the town centre at a competitive disadvantage against out of town retail and leads to vacant units.

Officer response

We agree, a less restrictive frontages policy will be brought forward.

Out of town retail

A number of respondents expressed opposition to retail and leisure developments outside of the town centre, other than those geared towards meeting the day to day needs of new development areas (resident, CPRE, Mactaggart and Mickel, Taylor Wimpey). A resident points out that large shopping complexes on the outskirts of Swindon are unattractive and encourage the use of car-based transport. They add to the congestion on the road network and town centre businesses suffer.

The Swindon Chamber of Commerce state that they do not support major retail development away from Swindon town centre. The out of town retailing developments of the 1980s and 1990s have seriously undermined the viability of the main town centre.

Swindon Chamber of Commerce states that it remains strongly opposed to any out of town retail development in new development areas, notably the Eastern Villages, that is planned at a scale more than to meet the day to day needs of the community that it serves.

Officer response

The quantum of retail floorspace planned in the New Eastern Villages district centre will be considered.

Strengthen Policy EC3

UK Commercial Property Trust seek a strengthening of Policy EC3 to reinforce the town centre first approach for retail and leisure uses. Specifically: more detail on the sequential approach including suitability, availability and the need for flexibility over scale and format. Also UKCPT seek more detail on the impact test including the need for assessments of the health of centres, shopping patterns and trading overlap. Also, clarity of the roles of different centres within the hierarchy is sought to avoid district centres undermining the role of the town centre.

Officer response

The proposed amendments will be considered in the rewriting of Policy EC3.

Retail threshold

A number of respondents support retaining the threshold (residents, CPRE, Swindon Bicycle Users Group, Swindon Chamber of Commerce, FI Real Estate Management). One respondent questions its worth in light of the recent approval of a very large quantum of out of town retail floorspace at Swindon Gateway North.

Promoters of non-centre retail development, Aldi Stores Limited, Capital Land suggest a higher threshold and Wanborough Parish Council also supports the use of a higher threshold.

Officer response

In light of the need for regeneration of Swindon town centre, it is considered that the lower, locally specific threshold remains appropriate.

Question 17, 18 and 19 (housing):

Do you consider that the current Local Plan policies are working to support the aims listed above [housing growth objectives]?

Do you agree with the above planning policy aims for housing and neighbourhoods? Please provide any further comments.

Do you have any views or suggestions for how planning policies could be better used to ensure that planned housing meets local needs?

Respondents generally considered that policies are not delivering planned housing growth or affordable housing. Several respondents referred to the current absence of a deliverable five year housing land supply.

Swindon Chamber of Commerce express concerns about the lack of executive housing in the area.

In terms of proposed changes to objectives respondents suggested:

- better quality, smaller developments
- housing that can support a car-free lifestyle
- a greater diversity of types of housing
- Several developers emphasised the important of ensuring that affordable housing and wheelchair housing targets are viability tested

Suggestions for how planning policies can better ensure housing meets local needs:

- Discourage single aspect flats (today's back to backs), windowless bathrooms and rudimentary kitchens in living rooms.
- Promote higher densities to discourage suburban sprawl.
- Take a positive approach to promoting self/custom build housing.
- Identify sites to for specific groups e.g. older people, custom builders, rather than requiring these to be delivered as part of the mix on volume housebuilder sites (HBF)
- Consider removing the concept of settlement boundaries as a constraint to housebuilding (Hannick Homes).
- Review employment sites for their potential to change to housing (Homes England) or allow mixed use development of these sites (Aldi Stores Limited).
- Review affordable housing policy, including rent to buy (Rentplus).
- Allocate a wider range of different sites (Castlewood Commercial Properties Limited).

Officer response

A number of useful points are made by respondents. In accordance with national policy, the Local Plan review will if possible seek to identify how at least 10% of the housing requirement can be met on sites of 1 hectare or less in area.

In light of changes to government policy, the Council will review its policy on housing mix and type.

Similarly, there is a need to review policy on density in light of changes to national policy.

Questions 20 and 21 (housing cont'd):

Do you have any views or suggestions for how planning policies could better used to achieve attractive, sustainable neighbourhoods?

Please provide any views on how recent and proposed changes in national policy for housing (e.g. to promote starter homes, self-build homes and community-led housing) should be reflected in the Local Plan Review.

Sustainable neighbourhoods

Suggestions for achieving attractive, sustainable neighbourhoods:

- High quality provision for cycling and walking should be mandatory, cycling provision should be segregated, not shared with pedestrians (Swindon Cycling Campaign, resident).
- Provide car clubs and electric vehicle charging points (councillor).
- Create traffic free play streets (councillor).
- Policy should incorporate the Sport England and Public Health England 10 principles for active design (Sport England).
- Require the provision of community centres (resident).
- Insist on high quality design (residents).
- Allocate unconstrained land for development (Thames Valley Chamber of Commerce, McTaggart & Mickel, Taylor Wimpey).

National policy changes

In relation to changes to national policy:

- A number of respondents referred to the revised methodology for calculating housing needs, some suggesting it should be used, others favouring a higher housing number.
- Policies HA-HA8 should be reviewed, any optional housing standards should be clearly justified.
- Introduce specific policies on self-build (residents) or for executive homes (Town and Country Planning Services)
- Any policy for a percentage of starter homes should be viability tested to ensure it doesn't simply displace affordable housing (Crest Nicholson)
- Historic small windfalls may indicate that there is not a need for a specific policy on self-build (Crest Nicholson)

Officer response

Policies HA1-8 will be reviewed taking into account the comments received and changes to national policy.

Questions 22, 23 and 24 (transport):

Do you agree with the above planning policy aims and strategy for transport and access?

Do you consider that current Local Plan policies are working to support the aims listed above?

Do you have any views or suggestions for how planning policies could be better used to improve access to services and facilities, reduce traffic and promote sustainable transport?

Many respondents supported the aims, but a number of suggestions for changes were made:

- The Manual for Streets user hierarchy should be adopted, and the priority should be excellent public transport provision and walking and cycling networks (local resident).
- Provide a western bypass from the A419 to the M4 (Webb Paton).
- Consider a low emission zone in the town centre to meet WHO air quality standards (councillor).
- Planning should not be overly restrictive of car transport in rural areas (Church Commissioners).
- A more strategic approach should be taken (Thames Valley Chamber of Commerce).
- Swindon's strategy should tie in with the wider Cambridge-Milton Keynes-Oxford arc (Oxfordshire County Council).

Some respondents did not consider that the policies achieve the aims. One respondent stated that the policies do not state how exactly sustainable transport will be implemented, they are merely suggestive, and in reality less priority is given to walking and cycling.

In terms of changes to policies:

- Some respondents felt the policies were not ambitious enough in securing infrastructure to open up long term development areas (MacTaggart & Mickel, Talyor Wimpey, Thames Valley Chamber of Commerce).
- Calls for sustainable transport to be genuinely prioritised rather than simply 'promoted' on a 'build it and they will come' basis. This should include segregated bicycle tracks and priority for cyclists at junctions. Avoid adding

extra road capacity as this results in induced traffic (Swindon Cycling Campaign, resident, councillor).

- Introduce 20mph in residential areas (councillor).
- Investigate providing free public transport (Wanborough Parish Council).
- While Highways England states that it supports policies TR1 and TR2, it also stated “*All SRN junctions within Swindon will require consideration for traffic impact and mitigation. Of concern are the capacity constraints along A419 and M4 junctions in the Borough. Highways England would take the view that any development adding trips to an off-slip, which then results in mainline queuing, extends a mainline queue, and/or increases the frequency at which a mainline queue occurs, will have a severe safety impact on the SRN.*”
- The plan should seek to improve connectivity between Swindon, The Thames Valley and Science Vale. It should support the provision of improved public transport on the A420 corridor (Oxfordshire County Council).
- Update the policies to include electric vehicle charging infrastructure (Public Power Solutions Limited).
- A transport assessment to inform plan-making should include impact on the A420 corridor.
- Aldi stores can reduce the need to travel, consider allocating sites for additional supermarkets (Aldi Store Limited).

Officer response

A number of the specific transport schemes suggested are not issues for land use planning policy or within the scope of the local plan review to implement. It is noted that there was support for policies TR1 and TR2.

Questions 25, 26 and 27 (infrastructure):

Do you agree with the above planning policy aims for planning infrastructure?

Do you consider that the current Local Plan policies are working to support the aims listed above?

Do you have any views or suggestions for how the planning, phasing and delivery of infrastructure could be improved?

Specific comments:

- Planning policies should include playing pitches as well as indoor and outdoor sport facilities (CPRE).

- The Swindon Clinical Commissioning Group should not be responsible for the infrastructure cost of acquiring land and building new healthcare premises. This should be secured through s106/CIL.
- There should be greater transparency on how CIL and s106 is spent (Councillor).
- Hannington needs connection to high speed broadband (Hannington Parish Council).
- There should be greater community involvement in determining what infrastructure is required (resident).
- Effective infrastructure planning requires a longer term view (Mactaggart & Mickel, Taylor Wimpey, Thames Valley Chamber of Commerce).
- Thames Water suggests specific policy wording and supporting text on Water Supply, Wastewater & Sewerage Infrastructure.
- We want to work together in future on strategic modelling under the duty to cooperate. An approach should be jointly agreed that takes account of already planned and proposed growth within the Vale of White Horse district of Oxfordshire as well as committed growth in Swindon alongside the infrastructure options planned to support it. As yet we have not received information relating to the strategic modelling undertaken by Swindon BC; it is unclear whether the impact of the already proposed New Eastern Villages on the A420 has been adequately assessed and the requisite mitigation measures identified. OCC will want to be satisfied that the transport assessment work identifies and costs any necessary mitigation measures within Oxfordshire. These should be included in the Swindon IDP and the local plan should contain policies to ensure that funding will be forthcoming from the development sites when needed to deliver the infrastructure, matched to the proposed growth (Oxfordshire County Council).
- The effectiveness of policies IN4 (Low Carbon Renewable Energy) and DE2 (Sustainable Construction) should be monitored (Public Power Solutions Limited).
- Consider allocating sites for “Low Carbon Development Areas” to assist with the delivery of an integrated approach towards the delivery of renewable and low carbon transport, heat, electricity, storage and transport opportunities where suitable opportunities exist, for example, at Waterside Park (Public Power Solutions Limited).
- Policy IN4 is amended to include specific support for battery based energy storage infrastructure (Public Power Solutions Limited).

Officer response

The comments will be taken into account in reviewing policy on infrastructure provision.

Questions 28, 29 and 30 (healthy and supported communities):

Do you agree with the above planning policy aims for healthy and supported communities?

Do you consider that the current Local Plan policies are working to support the aims listed above?

Do you have any views or suggestions for how planning policies could be better used to promote health and wellbeing?

Objectives

Most respondents supported the aims. The Swindon Cycling Campaign suggested referencing the health benefits of walking and cycling and a resident suggested the importance of walking and cycling links to facilities.

One respondent questioned how 'demonstrable need' is defined, questioning whether this could lead to parks being closed for insufficient footfall.

Hannington Parish Council suggest the recreational and well-being value of the countryside should be referenced.

Officer response

Officers broadly agree with the comments raised.

Effectiveness of policy and policy changes

Some respondents supported the policies, with the Theatres Trust supporting the protection of community facilities. Amongst other, the following comments were raised:

- Insufficient GPs and capacity at Great Western Hospital (Wanborough Parish Council)
- Healthcare should be listed as standalone infrastructure in the plan review (Swindon CCG)
- Refer to the health benefits of walking and cycling and bicycle tracks
- Ensure that there are sufficient school places to support growth as there are not spare places in Oxfordshire (Oxfordshire County Council).
- Carry out a built facilities survey (Sport England)

- Develop a policy and process for health impact assessments (resident)
- Allocate community buildings and places of worship in new developments (resident)
- Protect public open spaces (resident).

Officer response

Noted. We will consider the need for a built facilities survey and health impact assessments.

Questions 31, 32 and 33 (natural and built environment):

Do you agree with the above planning policy aims for the environment?

Do you consider that the current Local Plan policies are working to support the aims listed above?

Do you have any views or suggestions for how planning policies could be better used to protect and enhance the environment?

There was general support for the policy aims and the policies.

- Webb Paton question whether it is realistic for the Wiltshire and Berkshire Canal to ever be joined up and therefore whether this should be protected in planning policy. Conversely the Canal & River Trust seek continued protection and developer contributions towards restoration of the canal.
- Hannington Parish Council suggest that conservation area boundaries should be reviewed to ensure they adequately protect areas of conservation. One respondent expressed concern about the fate of historic buildings including the Corn Exchange, Mechanics Institute and Health Hydro (councillor)
- Concern was expressed about whether policy was adequately protecting AONBs and Another respondent, conversely, suggested more flexibility on development in AONBs.
- One resident suggested green gaps/buffer zones to retain the separate identity of villages.
- There was support for improve footpaths and cycle paths including a cycle path to Highworth (Stratton St Margaret Parish Council, resident).

Officer response

The need for continued protection of the canal route will be a matter for the Council to consider.

Amendments to conservation areas are not within the scope of the Local Plan review.

Policy on development in AONBs will need to reflect national policy.

The local plan includes indicative non-coalescence areas, these will be reviewed.

Question 34 (central area):

Do you have any views or suggestions for how planning policies can support the advancement of the regeneration of Swindon's central area and the enhancement of its role, to improve the image of the town?

A number of comments overlapped with those made in respect of specific policies above.

GWE Business West emphasised the importance of education, citing the mooted merging of Swindon and New College and the aspirations for a university.

UK Commercial Property Trust and CPRE referred to the need to review and update Central Area Action Plan policy. Specifically central area allocations should be reviewed to focus on deliverable allocations and the council should focus on delivery.

Two respondents referred to the importance of a new music venue/concert hall.

The Canal Trust emphasised the role of the canal in town centre regeneration.

Officer response

Central Area Action Plan policy will be replaced by the new Local Plan. Proposals for new canals, a university or music venue are beyond the scope of land use planning to implement.