



CONSULTATION DRAFT BLUNSDON - EAST NEIGHBOURHOOD PLAN (BENP) 2019

APPENDIX G

Consultation Statement 2019

Appendix G – BENP Consultation Statement

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INTRODUCTION

Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 requires the Blunsdon East Neighbourhood Plan Steering Group to produce a Consultation Statement and submit it alongside the Blunsdon East Neighbourhood Plan. Regulation 15 states that a consultation statement is a document that:

- contains details of the persons and bodies who have been consulted about the proposed neighbourhood development plan;
- explains how they were consulted and summarises the main issues and concerns raised by the person consulted; and
- describes how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.

This statement, in compliance with Regulation 15, summarises the consultation processes undertaken by the Blunsdon East Neighbourhood Plan Steering Group as part of the development of the Blunsdon East Neighbourhood Plan. References to more detailed reports of consultation activity can be found within the Evidence Base presented separately.

Consultation, as part of developing a final BENP, has been an extended process over many years and has included detailed discussions with and input from Swindon Borough Council as the Local Planning Authority as BENP policies have developed. As will be noted this has been a complex issue as, while the SBC Local Plan 2026 indicated that Blunsdon village should take a share of 100 new homes envisaged outside the main urban area, residential development has been ongoing, and continues, at a rate far in excess of this level whilst SBC has been unable to demonstrate a 5-year level of housing supply. This extensive development did not comply with either the wishes of local residents, the housing needs identified for those residents or the policies originally drafted based on the earliest consultations.

Development of the BENP has also involved detailed discussions with officers from Swindon Borough Council, commissioned research on technical issues, the use of external consultants employed by the Parish Council and negotiations with potential developers. Particular emphasis was placed on “front-loaded” community consultation to engage as wide a range of local people and interested parties as possible right at the start and before any proposals were formulated. The purpose of this was to ensure that the views and priorities of the local community could inform the plan from the outset.

Since the agreement to embark on the production of the BENP there has always been an agenda item ‘Neighbourhood Plan’ at every Parish Council Meeting with updates given by those Parish Councillors involved in the Steering Group. The Steering Group minutes are always copied to the Parish Clerk for inclusion. Periodically presentations were given to the Parish Council usually at critical stages, where comments, feedback and questions were fielded and gathered by the Steering Group.

Together with the involvement of working groups and stakeholders from the community, this overall body of work has shaped the policies that make up the Plan. Throughout this period, results from consultations in early years were validated by reviewing them at subsequent BENP open days.

The Blunsdon East Neighbourhood Plan now presented is the culmination of a process that has been taking place since 2013. The consultations history can conveniently be divided into episodes and this summary highlights the main events and supporting documentation.

CONSULTATION PROCESS

One of the first activities undertaken by the BENP Steering Group was to develop a communications plan. It was agreed that the principle process would be via open public consultations held in Blunsdon Village, targeted at the local community, supported by discussions with interested parties, such as

landowners and Swindon Borough Council and through the use of social media. The policies contained within the Neighbourhood Plan are the result of these consultations with the local community.

The 'Open Days' held in the Village Hall were advertised in the Village Magazine local Swindon Advertiser daily paper and on the BENP website and FACEBOOK Page.

Anyone could attend the 'open days' and a record was kept of the actual number of people who did attend together with their postcode to ascertain the spread of attendees (see Appendix A¹). The events were very well attended.

At each 'open day' a questionnaire was handed out to be completed either during the day or taken away and returned to a sealed box at the village shop. Attendees also had an opportunity to add comments or questions to the display boards in the form of 'post it notes'. In addition to these questionnaires people could give their views, concerns or comments to the BENP Web site or on the Facebook page.

The following were invited to the consultations, either electronically or by printed version:

- Statutory and non-Statutory Organisations, a list of their names is shown in Appendix B to this statement.
- Local Organisations/Community groups including church/faith groups, sports groups, schools, businesses, known developers, Swindon Council Officers, Blunsdon and Highworth Councillors, North Swindon MP and residents within the BENP area as shown in Appendix C.
- The residents were invited via an article in the Blunsdon Village Magazine which is distributed to all households/businesses in the village. Posters were also distributed around the BENP area.

After each consultation and with a review of the responses from the community and other inputs, policies were developed and amended to reflect the input received.

There have been five 'open day drop-in' public consultations all held in the Village Hall. The first was held in the village hall on 15/06/13 in order to identify the issues and the second held on 12/04/14 to collect more views/comments on previously identified issues in order to develop a vision, objectives and eventually the draft policies. The third open day was held on 24/05/2017 to gather views on potential development sites following changes to the NPPF with the open day on 28/05/2018 to receive views from the community on the sites selected as suitable for potential development. The final consultation, described as drop in sessions, was held on 4/5/19 and 8/5/19 and represented the opening of the period of 6 weeks consultation period, up to 15th June 2019, to collect views from the community and all stakeholders as required by Regulation 14.

- The plan document was available as a download from the Parish Council and the BENP website and through the Parish, BENP and Broadcast Blunsdon Facebook pages.

¹ References to appendices in this document refer to references below and not to the appendices of the main BENP.

- This leaflet, describing the plan and how to access it and engage in consultation was delivered to every household in the BENP area as a 'pull out' within the Village Magazine.
- Paper copies of the plan document were available at the Parish Office with a number of paper copies will be available on request for those who could not access the on-line version.
- There were two drop-in sessions in the Village Hall on Saturday May 4th 10am-4pm and Wednesday 8th May 4pm-9pm to allow interested parties to discuss the BENP in detail or to ask questions.

Attendance at the five events were as follows:

	Date held	No. Attended	Response Closing Date	Responses by questionnaire ^{\$}
Consultation 1	15/06/13	76	30/07/13*	152
Consultation 2	12/04/14	114	11/07/14*	73
Consultation 3	24/05/17	150	24/05/17	90
Consultation 4	28/07/18	135	18/08/18	137
Consultation 5	4/5/19 & 8/5/19	78	15/06/19	61 ⁺

*Any late returns were accepted for a month after official close date.

^{\$} Questionnaires were collected on the day or via collection boxes in the Village shop for questionnaire obtained from the website.

⁺ 48 residents, 8 developers and 5 statutory consultees

The complete set of responses for all questions on the questionnaires can be viewed on the BENP website for each public consultation.

At every stage of the development of the BENP, local groups and organisations, developers and the general public were consulted including informal consultations which took place ad hoc and details can be found in Appendix C.

PUBLIC CONSULTATIONS

Public Consultation 1

The questionnaire from the first 'open day' was also distributed with the June 2013 issue of the village magazine and to encourage a good response five replies were drawn from those completing the questionnaire and each received a £10.00 village shop voucher. Also, this first questionnaire could be completed using the BENP Web site.

The questionnaire consisted of 99 statements developed by the steering group centred around four themed sections; Housing, Transport and Employment, Education and Crime, Environment and Community. Respondents were asked to state whether they strongly agreed, agreed, disagreed or strongly disagreed with each statement. A summary of some of the questions is set out in the table below and formed the basis for the identification of the policies which eventually shaped the BENP.

Theme	No	Question	Strongly Agree	Agree	Disagree	Strongly disagree
A place people want to live	9	We have enough houses	60%	30%	8%	1%
	11	I am worried about future housing plans	73%	20%	6%	1%
	15	Houses are affordable in the village	7%	55%	32%	5%
	17	The village has space to grow	2%	28%	40%	30%
	18	We need more houses in the future	3%	29%	36%	32%
	22	The roads can deal with more houses	2%	2%	32%	64%
Pride in our heritage	58	I like the history of the village	61%	38%	1%	1%
	59	History and heritage are important to me	60%	37%	2%	1%
Supporting the community	62	We are a strong community	41%	51%	7%	1%
	64	There is good community spirit	40%	54%	5%	1%
	70	Sports facilities are good	11%	50%	34%	6%
Conserving nature and the environment	41	Green space is important to me	86%	14%	0%	0%
	47	Conservation is important to me	70%	29%	1%	0%
	48	We should preserve the conservation areas	75%	25%	1%	0%
	53	There should be green space between village and town	86%	12%	2%	0%

Conclusions and Actions

The BENP Steering Group reviewed the answers from the first questionnaire and the result was used to identify any concerns and issues and to formulate key themes to be developed through the BENP. These issues were then amalgamated, if appropriate, and used to develop a second questionnaire which focussed on these issues so as to clarify and fully understand them.

Public Consultation 2

The second questionnaire from the second 'open day' was also distributed in the May 2014 issue of the village magazine. Owing to the limited response from younger residents established from analysis of the age profiles on the questionnaires a 'Flyer' was handed out at St Leonard's CE Primary Academy and on the Warneford School, Blunsdon to Highworth bus. Five £10.00 iTunes vouchers were offered for the return of the questionnaire to encourage the younger residents to give their views.

The questionnaire followed a different format to the first consultation. Respondents were asked to reply to questions and provide opinions rather than responding to statements e.g. *Which green areas around the Neighbourhood area should we protect?* There were only a few Yes/No type questions. Detailed analysis of all responses and comments is held on the BENP website <http://blunsdonneighbourhoodplan.info/> but a summary of the Yes/No responses is set out below.

Question	Response rate*	Yes	No
Do you want a village green?	77%	75.3%	24.7%
Should the Bydemill Brook become a green conservation corridor to compliment the Mid Vale Ridge Natural Character Area?	84%	100.0%	0.0%
Should the Great Western Community Forest be extended?	69%	88.4%	11.6%
Should any further provision be made for employment land in the Neighbourhood Plan area?	63%	28.6%	71.4%
Should we have a village design statement similar to the example on display?	58%	86.2%	13.8%
Is the settlement boundary correct?	53%	35.8%	64.2%
Given the recent approvals of 57 and 61 (total 118) houses at Ermin Street, do you think the development needs of the village over the plan period have largely been met?	81%	84.0%	16.0%
Should developers contribute more to the cost of recreational pitches?	85%	90.6%	9.4%
Are the expected 25 new allotments coming as part of the Ermin Street development sufficient for current needs?	71%	66.2%	33.8%
* % of people providing an answer			

Conclusions and Actions

The results from the second questionnaire were used to develop a vision, objectives and eventually the draft policies within the draft plan.

Public Consultation 3

On the day around 150 residents and concerned stakeholders attended the consultation in the Village Hall. The development situation was explained using maps and facts and figures with explanations being provided by the Steering Group to questions and concerns. The need to change the original draft policy in the BENP was demonstrated as this did not allocate sites for development and the opinion of attendees was sought via a questionnaire.

The questionnaire also sought to qualify the understanding of the individual with regards to the development and planning situation in the Borough and the Parish.

We received 82 completed questionnaires on the day and the detailed results of those answers are published on the website. A summary of those results is below:

Housing	Strongly Agree	Agree	Disagree	Strongly Disagree
I am now aware of the uncontrolled planning issues created by Swindon Borough Council's lack of a 5-year housing land supply	58%	40%	0%	2%
I understand the ministerial statement	18%	59%	17%	3%
I am aware of sites already being considered for development	44%	49%	3%	2%
I know that there are other areas in the village offered for development	37%	52%	4%	4%
I have considered where controlled development might be possible	19%	52%	16%	3%
BENP should allocate sites for development	41%	42%	4%	4%
I have been asked to nominate potential development sites	26%	31%	24%	12%

(Where %s don't add up to 100 is where an answer was missed)

There were also many comments added to each questionnaire about fears, concerns and issues that were uppermost in residents' minds. We categorised these into nine rough areas as listed below. These are fears, worries and concerns about the category listed. We received no positive comments in any of these areas.

Category / Policy	Number of responses	% of responses
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Traffic	62	69
Infrastructure	54	60
Overdevelopment	46	51
Character	24	27
Conservation	19	21
Facilities	19	21
Education	8	9
Employment	6	7
Information not good	2	2

Conclusions and Actions

As a result of the consultation day feedback and the questionnaires the BENP group considered and developed a policy that allows the BENP to allocate sites assessed by criteria closely linked to the feedback we have received. The BENP group then put out a 'Call for Sites' for small developments within the BENP and when these were received from local landowners they were assessed against the criteria that set and chose the top sites from that list and then consult again with residents upon which sites they believe are the correct sites to be offered for development within the BENP area.

Public Consultation 4

Following changes to the NPPF released in 2018, Neighbourhood Plans were required to include a provision for development outside areas already identified under a Local Plan. This consultation was designed to seek views on the types of accommodation that should be provided. Respondents replied as follows:

Housing Type	Number of responses	% of responses
Family homes (3+ beds)	78	57
Small homes (1-2 beds)	78	57
Bungalows	70	51
Affordable housing	59	43
Self-build properties	44	32
Retirement accommodation	41	30
Detached executive homes	29	21

None at all	13	9
Apartments/ Flats	7	5

Details of the specific sites identified through the call for sites process and subsequent analysis were displayed for discussion with attendees being asked to give their opinion on whether the sites were suitable or unsuitable for development and where a respondent felt unsure. These views were instrumental in the final selection of potential development sites to be included in the Neighbourhood Plan. The views of respondents were as follows:

Summary of Site Allocation results			Origin	Suitable		Not Suitable		Unsure	
Reference	Description	Size		Number	%	Number	%	Number	%
Site 6	Grove Field (<i>part of site SHLAA-1198</i>)	0.60 Ha	BENP Call for Sites	62	46%	52	38%	22	16%
Site 7	Dinton, Broadbush	0.11 Ha	BENP Call for Sites	91	67%	28	21%	17	13%
Site 9	Blunsdon Land, Broadbush	2.36 Ha	BENP Call for Sites	50	37%	65	48%	20	15%
Site 10	St Leonard's Farm, Lower Blunsdon	0.51 Ha	BENP Call for Sites	77	56%	46	33%	15	11%
Site 11	Land South of Broadbush SHLAA 719	1.21 Ha	SBC Call for Sites 2013 SNLAA	49	36%	71	52%	16	12%
Site 12	Land East of Ermin St on Broadbush SHLAA 720	1.00 Ha	SBC Call for Sites 2013 SNLAA	50	36%	63	46%	24	18%
Site 13	Land East of Sams Lane SHLAA 1200	11.5 Ha	SBC Call for Sites 2013 SNLAA	12	9%	108	80%	15	11%

Conclusions and Actions

The plan document was revised to reflect consultation results with 3 sites included as being suitable for potential development.

Public Consultation 5

A final consultation, as required by Regulation 14, The Neighbourhood Planning (General) Regulations 2012, commenced on 4th May 2019.

The Plan was launched at an open session in the village hall between 10am and 4pm on Saturday the 4th of May, which marked the start the six-week mandatory consultation period. This was publicised on the BENP website, publicity via social media, notice in the Village magazine and the Parish Council noticeboards.

Copies of the draft plan and associated documents were available for attendees to study and forms available for attendees to make comments and suggestions using the questionnaire provided.

A second open session in the village hall was held on Wednesday the 8th of May between 4pm and 9pm.

The draft plan was also available on the Parish website and on BENP Facebook and Website and the questionnaire was available for completion on line or for download and submission. Hard copies of the draft plan were available in the Parish Council office, by appointment, between 10.00am and 2.00pm on Tuesdays and Thursdays during the 6-week consultation period.

People were requested to use the comments section of the questionnaire form to record their comments and suggestions which had to be submitted in writing to the Parish Office or by email within the consultation period which ended on Saturday 15th 2019. Comments were also be submitted by letter and email.

The questionnaire asked each respondent to state whether they agreed or disagreed with each policy in the draft plan and encouraged each respondent to provide their individual comments on each draft policy. The results from residents were generally very supportive. Where comments or suggestions were made these are detailed, together with the response, in Blunsdon East Neighbourhood Plan (BENP) Regulation 14 Consultation - Representations, responses and modifications document. Details of submissions from developers and statutory consultees are also included in this document set out as Appendix E to this Consultation Statement.

Conclusions and Actions

The BENP Steering Group met to review all comments made on each policy. Members agreed on a response to each submission and consequential action to be taken. Any agreed amendments to or the redrafting of the policies were implemented. The summary of consultation points and the steering group responses can be found in Appendix E to this statement.

The Neighbourhood Plan was updated to reflect the feedback from the Regulation 14 consultation and was formally submitted to Swindon Borough Council for Independent Examination.

METHODS OF COMMUNICATION

1. Regular reports on the progress of the plan, including minutes of meetings, and full details of the consultation and events were published either, via:
 - The BENP Website,
 - The Village Magazine with a circulation within the parish of c. 800 copies per month. This included specific articles and inclusion in the Blunsdon Parish Council monthly summary of business.
 - Facebook page.
 - Noticeboards sited at three locations around the Parish.
 - Articles and press releases in the Swindon Advertiser (See Appendix D).
 - Regular reports to the Parish Council and thence to the public via the Parish Council minutes published on the BPC website.
2. Consultation surveys were published on the BENP website with a link to this from the Parish Council website.
3. Full details of consultation events, including evidence documents and summaries of representations made, were published by the Parish Council and BENP Steering Group. Additional information was available by contacting the Clerk to the Parish Council.
4. Notices for open meetings and eventually access to the draft plan were also publicised on two Blunsdon social media pages which are active within the community

STAGES OF THE PLANNING PROCESS AND KEY DATES

The process followed in producing the Neighbourhood Plan was

Phase 1

Getting Started – Inception Meeting – March 2013

Dates – March 2013 to April 2014

March 2013 Terms of Reference agreed by Parish Council and BENP Steering Group formed.

Apr 2013 Parish Council approved application to Local Planning Authority to designate the Blunsdon East Neighbourhood Plan (BENP) area

- Statutory consultation period publicised in local paper, Blunsdon Village Magazine, Parish Council website and on local social media sites
- Copy of draft plan of the proposed area, along with covering letter and response form, delivered to every household in the BENP designated area, along with businesses and organisations within the designated area, Swindon Borough Council, potential developers and a number of statutory agencies
- Display of plan taken to Annual Parish Assembly
- Copy of draft plan, maps and associated documents placed on the BENP web site

Phase 2

Identifying Issues - This stage involved collecting information on a range of matters, including social, economic and environmental issues.

- Exhibition and open day drop in event
- Display boards
- Post-it notes
- Survey questionnaire (paper and online)

Steering Group prepare for exhibition/open day

Jun 2013 Exhibition/open day drop-in event at Blunsdon Village Hall

Aug 2013 Swindon Borough Council approved the designation of the BENP area

Jun 2013 to Apr 2014 Initial consultations continued with residents together with review of consultation questionnaires.

Review of format of questionnaire for future consultations (BENPSG Minutes 15/08/2013)

'Vision for Blunsdon' concept commences (BENPSG Minutes 15/08/2013)

Phase 3

Developing a Vision and Themes with Objectives. The results of Stage 2 were used to identify the main issues that the plan should deal with and the options that were available. Workshops exploring the key topics identified

Dates - April 2014 to December 2015

Vision and Objectives developed and published for comment in Village Magazine

Apr 2014 Display and drop in event at Village Hall

Apr 2014 Survey and consultation results taken to Steering Group and published on BENP website (BENPSG Minutes 24/04/2014)

Apr 2014 Consultation workshop to explore issues arising out of first and second consultation

Dec 2014 Summary of Responses and potential changes considered.

Feb 2015 Consideration of the responses.

June 2015 Production of Draft NP and guidance review meetings and feedback from SBC and external consultant whose support was provided by Planning Aid (Liz Beth).

June 2015 After workshop, the vision for Blunsdon is agreed (BENPSG Minutes 26/06/2014)

Aug 2015 Approach to SBC regarding SEA requirements

Aug to Nov 2015 Production of Draft Neighbourhood Plan and Community Testing

Oct 2015 Workshop to review draft plan and policies (BENPSG Minutes 02/10/2014)

Dec 2015 Considering any comments arising from Stage 3 and the findings of any new studies, a pre-submission draft plan was developed and published.

Phase 4

Dates – December 2015 to March 2017

Jan 2016/ Draft Pre-Submission Plan formulated (BENPSG Minutes 07/01/2015)

Feb 2016 Draft documents considered by Blunsdon Parish Council

Feb 2016 All responses and potential changes considered.

Mar 2016 Presentation of draft plan to full Parish Council

Mar 2016 Summary of comments and suggestions provided by Blunsdon Parish Council

Mar 2016 Draft Neighbourhood Plan as amended approved by Blunsdon Parish Council

Apr 2016 Review of draft plan completed by SBC and comments reviewed (BENPSG Minutes 13/04/2016)

May 2016 Steering Group meetings temporarily suspended owing to resource issues, the number of planning applications being received and due to personal tragedies within the key membership.

Phase 5

Steering Group reformed with additional membership resulting from a call for volunteers. Full review of BENP and revision of housing policies (BENPSG Minutes 15/03/2017)

Dates – March 2017 to December 2017

March 2017 Consultation with SBC multi-disciplinary group about lack of housing supply and threat of over-development in the BENP. Review of Gavin Barwell Statement re housing Land Supply and allocating sites for development.

PC encourage completion of NP following Government statement on use of 3-year housing supply data if a plan is in force (BPC minutes 06/03/17)

March 2017 Following on from changes to NPPF, decision to consult with residents to change the planning policies in the NP from non-allocation of sites to allocation of sites. Input from SBC on housing stock and local housing needs (BENPSG Minutes 27/03/2017)

4 Parish councillors appointed to Steering Group which is now a sub-committee of the Parish Council. Neighbourhood Plan to be standing agenda item for PC meetings (BPC Minutes 22.05.17)

May 2017 Open Consultation with residents on allocation of sites and subsequent call for potential sites for development. Review and development of Village Design Guide. Production of a Landscape Visual Impact Assessment (LVIA) of key views into and out from the BENP area.

Jun 2017 Consultation and questionnaire results collated and reviewed (BENPSG Minutes 29/06/2017)

June and July 2017 Call for volunteers to help develop Village Design Guide with detailed character assessments of the BENP area. 24 volunteers came forward for meeting in Village Hall on 15/06/2017

June 2017 Changed housing policies in response to Open Day inputs

July 2017 Detailed update on plan progress and contents provided to BPC (BPC minutes 17/07/17)

Aug 2017 Area Character assessments completed by volunteers for use in the VDG (BENPSG Minutes 03/08/2017)

August 2017 Work commences on allocation of sites considering process, screening and publication (BENPSG Minutes 03/08/2017) and invitations issued

August 2017 Appointment of Consultant to complete the LVIA (BPC Minutes 21/08/17)

Sept 2017 Call for Sites closes 23/09/2017 (BENPSG Minutes 18/09/2017)

Oct 2017 Position statement on proposed sites issued on Facebook, website page and forwarded for inclusion in next Village magazine (BENPSG Minutes 26/10/2017)

November 2017 Review and adoption of LVIA (BPC minutes 20/11/17)

November 2017 Engaged AECOM to help with assessment and allocation of sites

Phase 6

Dates January 2018 to January 2019

Jan 2018 Revised draft plan finalised prior to submission to SBC for their review (BENPSG Minutes 18/01/2018)

Mar 2018 Comments received from SBC and workshop arranged for team to review on 26/4/2018 (BENPSG Minutes 19/04/2018)

Mar 2018 Draft report on site allocation received from AECOM. Comments referred back to AECOM following review by the team (BENPSG Minutes 26/04/2018)

April 2018 SBC appointed to complete drafting and formatting of the VDS

May 2018 SBC team appointed to complete the VDS (BENPSG minutes 24/05/18)

Jul 2018 Representations made to SBC Local Plan review about adoption of Sams Lane and Stubbs Hill as areas of non-coalescence

Jul 2018 Final AECOM report on site allocation received.

Jul 2018 3 workshops held to consider, develop and finalise process for site allocation (BENPSG Minutes 19/07/2019)

July 2018 Flyer issued via Village Magazine, notice boards, social media etc. on forthcoming consultation event

Jul 2019 Consultation event held in Village Hall on 28/07/2018. 135 people attended. Good response for the selected sites and for adding provisions for small scale developments into NP.

Jul 2018 Revised NPPF issued by Government. Major revisions now required to various plan documents particularly basic Conditions Statement (BENPSG Minutes 02/08/2018)

Aug 2018 Consultation of allocation of sites formally closed on 18/08/2018 (BENPSG Minutes 23/08/2018)

Sep 2018 Workshop held to agree on sites to be allocated for potential development. Meeting then with SBC to review sites. Landowners of nominated sites advised out positive and negative outcomes. Positive site owners invited to respond. (BENPSG Minutes 04/10/2018)

Oct 2018 Following agreement on sites, SBC advise that further consideration to be given about need for an SEA (BENPSG Minutes 01/11/2018)

Oct 2018 – VDS completed and under final review (BPC minutes 15/10/18)

Nov 2018 PC advised 3 sites for potential small-scale development proposed after detailed assessment and meeting with SBC

Dec 2018 Drop in sessions held in Village Hall for residents to consider and comment on recently issued SBC SHELLA (BENPSG Minutes 29/11/2018)

Phase 7

Dates – January 2019 to September 2019

February 2019 Formal presentation by Steering Group of draft plan and VDS to Parish Council (BPC minutes 04/02/19)

February 2019 Proposed timescale for finalisation of the plan outlined (BPC minutes 18/02/19)

Detailed review of BENP and associated documents completed (BENPSG minutes 21/02/2019)

Consultants requested to harmonise formats of plan and VDS (BENPSG minutes 21/02/2019)

Team discussed next steps under heading 'Bringing the Plan into force' (BENPSG minutes 07/03/2019)

Development briefs for the 3 allocated sites being drafted and meetings with owners to be arranged (BENPSG minutes 07/03/2019)

Development briefs completed (BENPSG minutes 21/03/2019)

Fully formatted plan received from SBC team. This included the amendments required under the SEA letter of 22/03/2019 (BENPSG minutes 04/04/2019)

Plan, document formats, consultation meeting formats and timescale finalised for 'Bringing the Plan into force' starting with Regulation 14 consultation (BENPSG minutes 25/04/2019)

May 2019 Pre-submission consultation held as required by Regulation 14 of the Neighbourhood Planning (General) Regulations 2012. This included:

- Open meetings in the Village Hall on 4th and 8th May 2019;
- Notice of these meetings and access to the questionnaire were circulated in the Village magazine;

- Paper copies of the BENP being available for inspection at the Parish Council Office;
- Notification by social media including the BENP and Parish Council websites and the Broadcast Blunsdon facility;
- By email to those individuals who had volunteered to assist with the plan including those who undertook the character areas assessments;
- Responses could be submitted via email, deliver of completed questionnaires to the Village shop (from Village magazine or by download), online completion of the form or by delivery to the Parish Council Office.

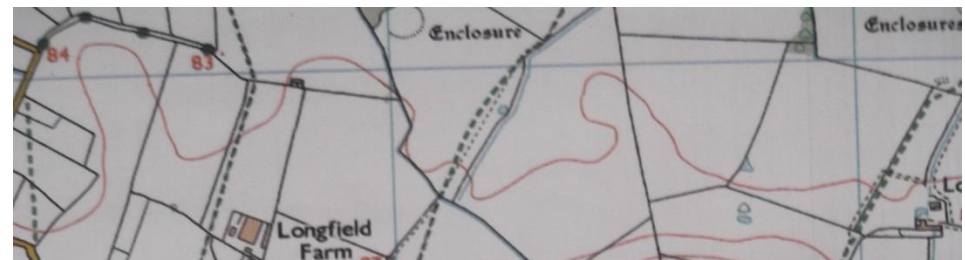
June to August 2019 Full review of all comments received to the consultation was undertaken. Responses to each were discussed and agreed either in a regular BENP meeting or in a series of workshops. Where it was agreed that changes to the plan were required, these were agreed and appropriate changes to documentation were undertaken. (BENPSG minutes 24/06/2019, workshop minutes 18/07/19, 25/07/19 & 07/08/19.)

October 2019 Following formal consideration of any points raised through the pre-submission consultation process, the final Neighbourhood Plan was approved and submitted to Swindon Borough Council as required by Regulation 16 of the Neighbourhood Planning (General) Regulations 2012.

Appendix A Map of attendee location from 1st Consultation

DRAFT

Each person attending the consultation was asked to indicate where they lived within the plan area. As can be seen a spread of residents from across the whole area was achieved.



Appendix B – Statutory Consultees

A total of 21 statutory bodies were consulted during the preparation of the plan. These were:

British Waterways (replaced by Canal and River Trust) www.canalrivertrust.org.uk

Commission for Architecture and the Built Environment info@cabe.org.uk

Civil Aviation Authority infoservices@caa.co.uk

Coal Authority via website <http://coal.decc.gov.uk/en/coal/cms/contact/contact.aspx>

Crown Estate Commissioners enquiries@thecrownestate.co.uk

Department for Culture, Media and Sport enquiries@culture.gov.uk

Department of Energy and Climate Change correspondence@decc.gsi.gov.uk

Department for Environment, Food and Rural Affairs defra.helpline@defra.gsi.gov.uk

Department for Transport via website <https://www.gov.uk/government/organisations/department-for-transport>

Environment Agency enquiries@environment-agency.gov.uk

English Heritage customers@english-heritage.org.uk

Forestry Commission fe.england@forestry.gsi.gov.uk

Garden History Society enquiries@gardenhistorysociety.org

Health and Safety Executive

Highways Agency ha-info@highways.gsi.gov.uk

Local and Regional Bodies forwardplanning@swindon.gov.uk

Ministry of Defence ParliBranch-Treat-Official@mod.uk

Natural England enquiries@naturalengland.org.uk

National Air Control Transport Services [via website http://www.nats.co.uk/contact/](http://www.nats.co.uk/contact/)

Rail Network Operators <http://www.firstgreatwestern.co.uk/About-Us/Customer-services/Contact-us>

Sport England info@sportengland.org

DRAFT

Appendix C– Non-statutory and informal consultations

LIST OF NON-STATUTORY CONSULTEES

Conservation Area Advisory Committees
County Archaeological Officers

Thames Water - Drainage Board
Water and Sewerage Undertakers

Schools: St Leonard's CE
Highworth Warneford

NUMBER OF BLUNSDON COMMUNITY GROUPS = 15

LIST OF BLUNSDON COMMUNITY GROUPS:

Nursery School
Youth Club
Brownies
Beavers
Scouts
Cubs
Village Garden Club
Village Shop
WI
Village Magazine
Football Club
Cricket Club

LIST OF BLUNSDON CHURCHES:

St Leonard's Blunsdon
Blunsdon Methodist
Blunsdon Baptist

INFORMAL CONSULTEES

Developers and their agents:

- Linden Homes
- Savills
- Carter Jones (Oxford)
- Hunter Page
- Hills
- Turley Associates
- Persimmon

Others:

Ramblers Association

Blunsdon Action Group (B.A.G.)

SBC Planning Officers, Traffic Officers, Rights Of Way Officers, Conservation Officer

Blunsdon Surgery

St Leonard's Academy

Local Historians – Mike Relf MBE MA MBA, Bill King and Paul Radway

Highworth Town Council

Highworth Cycling Club

Cricklade NP Group

Planning Aid, Liz Beth,

Locality, Eden Project (DCLG)

Civic Voice

Community First, Belinda Fowler, Marion Rayner

Haydon Wick Parish Council

Highworth and Blunsdon Ward Councillors, Steve Weisinger, Alan Bishop, Maureen Penny

North Swindon MP, Justin Thomlinson

Appendix D - Summary of newspaper publicity

Date	Headline and Summary
30 May 2013	Consultation on the Designation of Blunsdon St Andrew - East Neighbourhood Area and Highworth Neighbourhood Area The Neighbourhood Planning (General) Regulations 2012 Part 2 (6)
6 September 2013	'Keep the spirit of loved village,' plea THE people of Blunsdon have voiced their disapproval at plans to expand the village.
23 September 2013	Bid to build 63 houses A PLAN has been announced to build more than 60 new houses in Blunsdon.
30 December 2013	Homes development given the green light PERMISSION has been granted to build 57 houses between Ermin Street and the A419 close to Blunsdon.
15 April 2014	A cunning plan BLUNSDON: Swindon Civic Voice, in partnership with Blunsdon Neighbourhood Plan Group, are preparing a Neighbourhood Plan on Thursday at 1 Milton Road, starting at 7pm. Blunsdon is one of the first communities in the Borough to write a neighbourhood...
16 April 2014	Plan aims to keep village life sweet A PLAN to help secure the quality of life in a North Swindon village has taken another step forward.
7 June 2014	Residents have say on bid for 69 homes PLANS for a further housing development in Blunsdon were put before residents yesterday.
24 May 2017	Villagers who feel 'under siege' air their views on development plans DEFIANT residents gathered in Blunsdon on Wednesday in a bid to hold back the tide of development currently swamping the village.
1 June 2017	Villagers praised for huge show of support in fight against developers RESIDENTS in Blunsdon have been praised for their fighting spirit after they came out in force to stop developers encroaching on their village.
26 August 2017	Blunsdon residents appeal to local landowners in fight against outside development A GROUP of residents fighting an onslaught of planning applications are appealing for local landowners to offer sites for small planned developments.
12 November 2017	Plans to build more than 50 homes on 'beautiful' green space likely to be approved A CONTROVERSIAL plan to build 54 homes on a patch on idyllic countryside will likely be approved when it comes before Swindon Borough Council's planning committee on Tuesday night.

Appendix E -

Blunsdon East Neighbourhood Plan (BENP) Regulation 14 Consultation - Representations, responses and modifications

The Consultation received representations from 48 residents on line and by form. The Steering Group allocated them all a number and unique reference in order to preserve their privacy. Eighteen of those received, agreed to every policy with no comments, they were residents 1,2,3, 12,16,17,22,23,29,33,34,36,37,39,40,42,45,47 and 48.

Residents

COMMENT	RESPONSE	NP MODIFICATION
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Resident 4 – Ref: wfuu6

Policy 1 Yes we agree but feel it must be extended to the proposed development behind Turnpike Road should the development not be turned down on the grounds that it should be deemed a non coalescence area.	Noted	No modification
Policy 2 This is a good thing that only small developments are considered	Support appreciated	No modification
Policy 3 The areas of non coalescence should include the area behind Turnpike Road. Due to the character and individual historic nature of the properties in Turnpike Road area 3 on figure 8 map should be included as an area of non coalescence and any development prohibited as it wont preserve the unique identity of this Roman road and Blunsdon. A castle is not secure unless	Agreed	No modification

<p>a moat completely surrounds it.</p> <p>Policy 4 Bridges ,highways, traffic problems, surgery overload should all be in place before houses especially Kingsdown development.</p> <p>Policy 5 We support this but the character assessment booklet does not include Turnpike Road which with Ermin Street is one of the oldest and historic roads in Blunsdon dating from Roman times. The data collected on Turnpike Road should be included in the booklet.</p> <p>Policy 6 This should include the impact on Turnpike Road from construction traffic especially the speed cars already travel down this road as it is a potential Road Safety issue. Turnpike Road should also be mentioned regarding the Cold Harbour junction as it has to give way to traffic from Highworth, Blunsdon and Tadpole village making it extremely difficult to get out of the Road. Another reason why the development behind Turnpike Road should be blocked.</p> <p>Policy 7 No comment</p> <p>Policy 8 Yes but consideration to be given again to traffic, pollution and Road Safety if businesses require the use of large vehicles</p> <p>Policy 9 But funds should be agreed and parish enhancement</p>	<p>Agreed, but the Neighbourhood Plan cannot influence the infrastructure delivered by the Strategic Allocation NC5</p> <p>Agree and will include data for Turnpike with Ermin St in Character Assessments</p> <p>The impact of construction traffic onto Turnpike Road is outside of the scope of the Neighbourhood Plan, as this relates to SBC – allocated and/or approved development, the traffic implications of which are matters for the Highways Authority</p> <p>Again, highways impacts of development will be considered by the Highways Authority, but the Parish Council are only too aware of the need for development to be proportional to the size of the village</p>	<p>No modification</p> <p>Modify VDS and Character Assessment booklet as per comments</p> <p>No modification</p> <p>No modification</p>
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<p>built ?done before development construction starts.(speedway track development is an example of housing built and infrastructure forgotten or delayed)</p> <p>Policy 10 More green spaces and leisure facilities can only be a good thing.</p> <p>Policy 11 No comment</p> <p>Policy 12 Agreed. again the fields behind Turnpike Road has trees and hedgerows and the fields are used by Deer , pheasants,foxes, numerous birds, grazing cattle and we think a pair of sparrow hawks.</p>	<p>Agreed – we can only encourage developers to engage at an early stage with the Parish Council, Swindon Borough Council and statutory consultees</p> <p>Support appreciated</p> <p>Support appreciated</p>	<p>No modification</p> <p>No modification</p> <p>No modification</p>
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Resident 5 – Ref: oucpe

<p>Policy 1 20 dwellings should be absolute maximum</p> <p>Policy 2 No comment</p> <p>Policy 3 It is very important that these areas are maintained as non development to try and keep as much as possible the character of the village</p> <p>Policy 4 This is a must</p> <p>Policies 5, 6, 7, 8 & 9 No comment</p>	<p>20 dwellings is the maximum allocated under the Neighbourhood Plan</p> <p>Support appreciated</p> <p>Support appreciated</p>	<p>No modification</p> <p>No modification</p> <p>No modification</p>
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Policy 10 Very important	Support appreciated	No modification
Policy 11 No comment		
Policy 12 Without this the village will lose a lot of it's character	Support appreciated	No modification

Resident 6 ref: l4pdz

General comment on the high quality of the plan that I downloaded today. It is an excellent piece of work and the Parish Council are to be applauded. Just the right balance of preservation of our village but with managed growth.	Support appreciated	No modification
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Resident 7 – Ref: 6rs8

Policies 1 – 5 and 7 – 12 No comment Policy 6 This is extremely important as the amount of extra traffic using all the village roads will cause problems.	Support appreciated	No modification
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Resident 8 – Ref: 7112h

No comment (NB: did not agree with all Policies but no reason given for objection)

Resident 9 – Ref: It2f8

<p>Policy 1 To date (May 2019) we have had 400 new developments in Blunsdon - this has changed the flow of traffic and effected the calmness of a lovely village.</p>	<p>Agreed</p>	<p>No modification</p>
<p>Policy 2 As long as these are minor developments (less than 10) - see above we have already taken on a lot of developments.</p>	<p>Agreed – hence the maximum 9 dwellings per plot.</p>	<p>No modification</p>
<p>Policy 3 This is a must to protect and keep the village as a village.</p>	<p>Noted</p>	<p>No modification</p>
<p>Policy 4 Developers need to adhere to and be sympathetic with the local area.</p>	<p>Agreed</p>	<p>No modification</p>
<p>Policy 5 See above</p>	<p>Agreed</p>	<p>No modification</p>
<p>Policy 6 Congestion is a problem at the moment. Adding new developments will not help.</p>	<p>Noted</p>	<p>No modification</p>
<p>Policy 7 The local community facilities need to be in keeping with the villages needs - local village shop, local doctors surgery etc.</p>	<p>Agreed</p>	<p>No modification</p>
<p>Policy 8 As long as the impact of this is not detrimental to village life and does not impact on the way it is at the moment.</p>	<p>Noted</p>	<p>No modification</p>
<p>Policy 9 Local Parish Councillors should have the control</p>	<p>Noted</p>	<p>No modification</p>

on the 'budget' and spend on local issues. Policy 10 Providing facilities for locals is an utmost importance - for health, enjoyment and keeping the village spirit.	Agreed	No modification
Policy 11 It is important that local views are kept for the enjoyment of people living in the village and for future generations.	Agreed	No modification
Policy 12 Trees and foliage provide the cleanliness and ambiance this village deserves.	Agreed	No modification

Resident 10 -cfsth

Policy 1 but more affordable housing for younger people.	Over 150 affordable houses have been granted planning permission within the village over recent years	No modification
Policy 2 Support idea of starter homes.	Noted	No modification
Policy 3 A bigger area of non-coalescence should be around the village given that the Local Plan suggests Blunsdon being kept separate from Swindon	Noted – Non coalescence area needs to be proportional to the size of the village therefore any larger an area might not be approved by the Inspector.	No modification
Policy 6 Planning applications for large scale developments should be refused if the road system is inadequate and not sufficient to cope with traffic.	Agreed, however this is a SBCLP highways issue	No modification

Policy 7 Chapel Hill Methodist Church is now a residence NOT a Community facility.	The Methodist Church referred to is the one on High Street.	No modification
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Resident 11 -9ekdk

Policy 1 Fully agree, although obviously the big developments approved outside the policy render this somewhat ineffective.	Noted	No modification
Policy 2 Agree. Shame it can't be more restrictive/binding	Noted	No modification
Policy 3 Very important.	Noted	No modification
Policy 4 In as far as the developers can be trusted.	Noted	No modification
Policy 6 Agree, although the big developments will make this very difficult.	Noted however a NP cannot influence traffic and transport policies	No modification
Policy 9 Yes, as long as the Parish doesn't negotiate too much away in the process.	The creation of the BENP will give the Parish a greater percentage of developer contributions when made.	No modification

Resident 13 eq3ym		
<p>Policy 6 I believe there is a pressing need for local calming measures down Blunsdon Hill/Ermin St not just the top end of Ermin St but right down the hill.</p>	These are already in progress funded by developer contributions.	No modification
<p>Policy 10 Definitely need to protect Blunsdon Ridge looking north towards Thames Vale.</p>	Policy 3 will help to preserve this	No modification
<p>Policy 11 It is absolutely vital that these areas and views are preserved.</p>	Noted	No modification
<p>Policy 13 Totally agree - Essential we preserve our Dark Skies despite recent + imminent developments.</p>	Noted	No modification
Resident 14 - c1x2h		
<p>Policy 1 Yes, this is in line with the village as it is today</p>	Noted	No modification
<p>Policy 2 This will ensure we simply are not overrun with large developments</p>	Noted	No modification
<p>Policy 3 Vital that we do not become part of Swindon and we keep our village identity</p>	Agreed	No modification
<p>Policy 4 Although it seems we have little or no voice when any objection is raised</p>	Noted	No modification

<p>Policy 5 Yes of course we must strive to maintain the appearance of the village</p>	<p>Noted</p>	<p>No modification</p>
<p>Policy 6 The village at peak times both morning and evening can often be in gridlock, with the "rat run" being used more and more. The speed of traffic along Broadbush is a real safety concern and with extra traffic this will only become more of an issue</p>	<p>Noted – Noted however developer contributions are already being used to provide mitigation methods on Ermin Street including traffic calming</p>	<p>No modification</p>
<p>Policy 7 Again it is vital that we support and use local facilities - so we must also continue to keep these</p>	<p>Noted</p>	<p>No modification</p>
<p>Policy 8 Yes But I am not convinced about the home working point, while this is now more popular it is only a small number and should not be taken into consideration when suggesting it helps with traffic flow</p>	<p>Noted</p>	<p>No modification</p>
<p>Policy 9 Yes however it must be to the benefit of residents</p>	<p>Noted</p>	<p>No modification</p>
<p>Policy 10 Yes but again with Hills and SBC ignoring the dark skies point with the ongoing discussions for the lane to the east of the 54 dwelling on Broadbush</p>	<p>Noted and Policy 9 will support this.</p>	<p>No modification</p>

Policy 11 These must be maintained	Noted	No modification
Policy 12 These must be maintained	Noted	No modification
Policy 13 Yes but again with Hills and SBC ignoring the dark skies point with the ongoing discussions for the lane to the east of the 54 dwelling on Broadbush	Noted	No modification
Resident 15 8ciga		
Policy 1 Would prefer there was no more construction in Blunsdon.	Noted – however the majority of respondents to our questionnaire accepted small-scale development	No modification

Resident 18 – a864h

Policy 1 Agree.	Noted	No modification
Policy 2 don't agree	Noted	No modification
Policy 3 Agree strongly, good use of non-farm land but access to Swindon must be addressed, not via Cold Harbour bridge..	Noted but not relevant to this policy	No modification
Policy 4 Agree	Noted	No modification
Policy 5 Yes and will they address access needs and infrastructure development.	Not relevant to this policy	No modification

Policy 6,7, 8 Agree	Noted	No modification
Policy 9 It must be mandatory to solve the congestion at the Cold Harbour junction before any new developments are granted. This is lunacy otherwise!	Noted – this is something Highways England are already looking at, and will be a consultee on any planning application concerning our proposed site allocations.	No modification
Policy 10, 11, 12, 13 Agree	Noted	No modification

Resident 19 –jvqli

Policy 1, 2, 3, 4 Agree	Noted	No modification
Policy 5 It would be good if Policies made allowances for self build but within the constraints of the design statement.	Nothing in the policy excludes self-build within the constraints of the Village Design Statement	No modification
Policy 6, 7, 8, 9, 10, 11, 12, 13 Agree	Noted	No modification

Resident 21 -7yjcg

Policy 1, 2, Agree	Noted	No modification
Policy 3 Agree This should extend beyond the junction of Sam's Lane on the B4019	The policy proposes this through the nomination of area 4 as a rural buffer	No modification
Policies 4 to 13 Agree	Noted	No modification

Resident 24 –xzdc9

Policies 1 to 5 Agree	Noted	No modification
Policy 6 It would be good if the policy made allowances for self build but in the constraints of the Design Statement	Nothing in the policy excludes self-build within the constraints of the Village Design Statement	No modification
Policies 7 to 13 Agree	Noted	No modification

Resident 25 –w9had

Policies 1, 2, 3, Agree	Noted	No modification
Policy 4 Agree, Particularly the field off Ivy Lane and between Front + Back Lane	Noted	No modification
Policies 5 to 9 Agree	Noted	No modification
Policy 10 This is crucial as we have to work hard to maintain character of the village. Will there be any funding for Churches?	Application for funding from the CIL can be made at any time but must show benefit to the whole community	No modification
Policy 11, 12, 13 Agree	No modification	No modification

Resident 26 t1wwn

Policy 3 Fully support having protected green spaces	Noted	No modification
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<p>preventing over development.</p> <p>Policy 6 A toucan crossing isn't really going to solve the gridlock at Turnpike junction but would make it safer to cross for pedestrians.</p> <p>Policy 12 The UK needs to plant 3 billion new trees by 2050 to become carbon neutral. Protecting our village trees is so important. I would like to see a plan to plant more trees in our village.</p>	<p>Noted - will pass comment on to Parish Council for consideration.</p> <p>Noted and will pass comment on to Parish Council for consideration.</p>	<p>No modification</p> <p>No modification</p>
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Resident 27 kff2n

<p>Policy 3 Yes it is very important that the character of the village is protected from encroachment.</p> <p>Policy 4 Essentially this must be a serious opportunity to address concerns. Too often it appears that developers are '<i>going through the motions</i>' and that there is an assumption that the developer will win.</p> <p>Policy 5 'In harmony with its setting'?? Absolutely agree, but difficult to see how the development of the site behind Orchard House, Hunts Hill, complies with this. There has been anything but</p>	<p>Noted</p> <p>Noted</p> <p>Noted but the BENP cannot influence any previously agreed planning applications.</p>	<p>No modification</p> <p>No modification</p> <p>No modification</p>
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<p>'harmony' over this development.'</p> <p>Policy 6 This is a HUGE concern the traffic through the High St has increased considerably since the Cold Harbour Junction changes, very dangerous, especially at top of Hunts Hill and especially when children and parents are walking to & from school on narrow pavements.</p> <p>Policy 8 A regular, more frequent bus service would help to mitigate against traffic pollution.</p> <p>Policy 9 Yes any development should carry a substantial requirement to financially contribute to a village amenity fund even when no immediate project is planned.</p> <p>Policy 10 There is a National and International global necessity to adhere to this.</p> <p>Policy 11 Although planners state that one has '<i>no right to a view</i>', development which adversely impacts on residents views should be considered i.e. The development to the rear of Orchard House.</p> <p>Policy 12</p>	<p>Noted – the Parish Council has a traffic - calming plan which should help</p> <p>Agreed but outside the scope of the Neighbourhood Plan</p> <p>Noted and the creation of the BENP will give the Parish a greater percentage of developer contributions when made.</p> <p>Noted</p> <p>Noted</p>	<p>No modification</p> <p>No modification</p> <p>No modification</p> <p>No modification</p> <p>No modification</p>
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Too often developers seem to disregard this requirement & once trees have been felled or hedgerows grubbed out the damage is virtually irreversible.	Noted	No modification
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Resident 28
b3an7

<p>Policy 1 Accepting that we have to have some development, it is preferable that it is on a small scale and for families and more senior residents.</p> <p>Policy 2 As above for Policy 1</p> <p>Policy 3 It is really important that Blunsdon village remains just that, 'a village'.</p> <p>Policy 4 Traffic flow, congestion & bus services are a huge concern for Blunsdon villagers, particularly the ageing population. It is important that these things are sorted out at the earliest possible time.</p> <p>Policy 6 We agree with the proposals as far as it goes,</p>	<p>Agreed</p> <p>Noted</p> <p>Agreed</p> <p>Noted, and whilst the NP cannot influence SBC traffic and transport policies, the Steering Group will pass these comments onto the Parish Council</p> <p>Noted, however-the NP cannot influence SBC</p>	<p>No modification</p> <p>No modification</p> <p>No modification</p> <p>No modification</p>
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<p>BUT it doesn't seem that we have any real influence over what happens. The main cause of congestion is the bridge. It can be an absolute nightmare to navigate particularly in rush hour. It appears that nothing significant is going to happen about this & that things will only get worse.</p>	<p>traffic and transport policies</p>	<p>No modification</p>
<p>Policy 8 'Working from Home' may well make a small difference to congestion, but a significantly improved bus service would help much more. People do not just work 9-5 & even those hours are not well catered for by the bus companies. Many businesses now have shift work & employees have absolutely no choice other than their own transport.</p>	<p>Noted</p>	<p>No modification</p>
<p>Policy 9 We didn't know that Blunsdon had a Heritage trail until now, although (having seen it) we have walked most of it. We have now printed it for future use, although the stretch on the busy Highworth Rd is off putting.</p>	<p>Noted and the creation of the BENP will give the Parish a greater percentage of developer contributions when made.</p>	<p>No modification</p>
<p>Policy 11 We seem to have no choice in having every small space in the village stuffed to capacity with houses, BUT it is imperative that it remains just that, a village! It's also imperative that residents can see green space around them to confirm this.</p>	<p>Noted</p>	<p>No modification</p>

Resident 30 cmzm1

<p>Policy 1 I agree and commend</p>	<p>Noted, your comment is appreciated.</p>	<p>No modification</p>
<p>Policy 2 Curtins report on drainage for the Hill Cottage site is significant. Increased run off will flood lower village. The quantity and quality of ground water needs a BENP view</p>	<p>The NP's proposed allocations will be subject to statutory requirements to reduce surface water run-off</p>	<p>No modification</p>
<p>Policy 3 The G.Belt (Green) was established to stop ribbon development and stop coalescence. Has green belt policy been abandoned? -Please.</p>	<p>There is no Green Belt within Swindon Borough but the NP proposes to secure rural buffers which will prevent coalescence</p>	<p>No modification</p>
<p>Policy 4 A global view for BENP needs to assess drainage issues as more land is hard surfaced. Danger of flooding in Lower Village.</p>	<p>Noted. As above, the NP's proposals will not increase surface water drainage issues; any existing issues are the responsibility of the Local Lead Flood Authority</p>	<p>No modification</p>
<p>Policy 11 Preserving views across the valley is good for all. Especially the public footpath to the north of the ridge and proposed Hill Cottage site.</p>	<p>Noted</p>	<p>No modification</p>
<p>Thank you all, for the efforts to address the</p>		

<p>planning issues in Blunsdon.</p> <p>My main concern technically , apart from the self-evident Infrastructure issues , is the quality and quantity of the Ground Water and Surface Water flows that will occur as development proceeds</p> <p>I attach the Curtin Report on Drainage and Flood Risks the at THE HILL COTTAGE Development (at the Hotel Golf Course) for completeness.</p> <p>In the report, amongst many items they only really talk about the HILL COTTAGE site and then go on to review maintenance of surge capacity reservoirs and soakaways</p> <p>To Protect the Lower Village I would think a significant bypass canal or pipeline would be required and also more significant local surge capacity ponds</p> <p>This particular item does not seem to get reviewed on a whole plan basis , only on a site by site basis . Maybe the individual sites are each OK but what happens when they are added together is the point and what will flows look like then ?</p> <p>So until what we should call a Global Drainage Plan is produced , for the whole, area showing quality and quantities of both surface and importantly underground water flows (through</p>	<p>As above, the NP's proposals will not increase surface water drainage issues; any existing issues are the responsibility of the Local Lead Flood Authority</p>	<p>No modification</p>
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<p>the aquifer) then this should be a constraint on development until a Plan is agreed .</p> <p>As you probably know there is a significant spring Line to the North of the Hotel along the public footpath . This spring line is on the Geology boundary between the Oxford Clay and the Stanford Formation Corallian Limestone and I guess was once used as a source of 'Pond Water' for livestock .</p> <p>If for any reason flows from this spring line increased it would have a significant effect on the lower village , I would think.</p> <p>A lot of work has gone into the existing BENP , so whoever did it Well Done .</p> <p>If I can be of further help please revert</p>	<p>Thank you and all your comments have been considered</p>	<p>No Modification</p>
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Resident 31 mrjq6

<p>General Comment on BENP</p> <p>We moved here thinking it was a lovely little village not knowing how it was going to change so dramatically, now very disappointed!</p>	<p>Noted</p>	<p>No modification</p>
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Resident 32 djl14

Policy 1 Yes fully support small scale development.	Noted and comment appreciated	No modification
Policy 2 Yes, we should maintain the settlement boundary.	Noted	No modification
Policy 3 Strongly support	Noted and comment appreciated	No modification
Policy 5 Especially in the conservation areas	Noted	No modification
Policy 6 Agreed	Noted	No modification
Policy 9 Full flexibility for the Parish Council to review priorities is needed.	Noted. The PC has a process in place to regularly review priorities for expenditure.	No modification
Policy 11 Strongly support. At least 4 planning appeals in Lower Village have identified 'views' as an essential factor.	Noted and comment appreciated	No modification

Resident 35 - Pbddl

Policy 3 Would have preferred larger separation. Hope the plan becomes effective before the Council/Developers and planning inspectorate allow more building.	Noted; the rural buffer areas are as large as we feel appropriate for the scale of the village	No modification
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Resident 38 -c31vx

No to policy 8	Noted	No modification
Policy 9 response: Honda employees will need jobs - shortly	Noted, the NP emphasis is on rural style business development only, as appropriate to the village. Swindon has larger designated employment estates.	No Modification
Policy 13 response: Continue with 'no/low light' views of the village.	Noted	No Modification

Resident 41 -djsx

Policy 13 Keep the Area Unlit.	Noted	No Modification
Policy 4 Essential that Developers communicate with existing residents and respect their views and concerns at all stages and negotiate satisfactory outcome for local people.	Noted	No Modification
Policy 5 Need to keep Blunsdon as a Rural Village.	Agreed	No Modification.

Resident 43 -8adps

Policy 11 response: Get on with NC5 and leave the	Noted. The delivery of NC5 SBCLP Strategic policy	No Modification
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north side of Blunsdon as is.	allocation is outside the remit of a NP and is currently held-up due to Highways England's concerns regarding traffic.	
Policy 6 response: This is a start but lots more required	Noted, however BNEP has limited powers in this area	No Modification
Policy 3 response: This is a must to keep the village scene.	Noted	No Modification
Policy 1: Not Until major improvements are made at the Cold Harbour junction.	Each of our proposed allocations will be subject to review by the Highways Authority, and Highways England have already confirmed that they will not, alone, require major junction improvements.	No Modification

Resident 44 -rr3ta

Policy 6 response: Too many applications for developments have already been granted. Road improvement should have been a condition of approval.	Noted, The Parish Council have objected to many of these applications, which were under the remit of SBC.	No Modification
Policy 3 response: Kingsdown NC5 is already planned and too close to Broadbush.	NC5 is a local plan Strategic site designation which a NP is unable to influence or challenge, although we support the retention of the existing Non-Coalescence Area.	No Modification
Policy 1 response: There has been too much development approved already	Agreed, but Policy 1 proposes only small scale development in order to have a positive approach which, once the NP is Made, will enable us to better defend future such applications.	No Modification.

Resident 46 - 3t1yt

<p>Policy 7 response: Community facilities should be protected and enhanced. How is the local school and Doctors expected to cope with hundreds more houses and no expansion to their services. It is forcing people into their cars for school runs etc and adding to the road problems</p>	<p>Noted and agreed. Community facilities enabled with CIL money from Developers</p>	<p>No Modifications.</p>
<p>Policy 6 response: With traffic queuing at least twice a day for several hours the length of Broadbush. I am concerned with the levels of toxic fumes residents are inhaling just sat in their homes. Plus it is a narrow road with narrow paths, no cycling facilities</p>	<p>Noted. Policy 6 does address road safety, pollution and improvements required.</p>	<p>No Modification.</p>
<p>Policy4 response: It is essential that traffic and road access is considered. Public transport is also highly necessary as there is no way currently to commute on the very limited bus service offered. There are no cycle paths around the village or into Swindon.</p>	<p>Noted. However transport access is not only a design issue but one considered by SBC primarily. Public transport may be enhanced with developer contributions through CIL. There is one cycle path along the old Ermin street, but agreed connections to Swindon down Lady lane are poor, but not along the road to Thamesdown Drive/Cricklade Road.</p>	<p>No Modification</p>
<p>Policy 3 response: I agree we need a clear boundary to ensure we remain a village and not swept up by large developments.</p>	<p>Noted.</p>	<p>No Modification</p>
<p>Policy 1 response:I am disappointed that all development is in the same area of Broadbush. With the 54 houses already planned this means 74 houses added with in a very small timescale.</p>	<p>Noted. However these sites were chosen on Broadbush as result of community consultation and each short-listed site was tested against the</p>	<p>No Modification.</p>

The road cannot take any further traffic and the fumes	same rigorous process, with only those with majority support being proposed for development.	
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Resident 46 - su2d7

Policy 9 Any developers contribution should be focussed on the area the development affects the most.	Noted. However, the Developer contribution cannot be guaranteed to be spend at the site location, as the contribution is to benefit the whole community	No Modification.
Policy 8 I am happy to support existing industry but even small scale developments will add to traffic volume, noise & pollution.	Noted--and each of the three proposed sites will be subject to review on these and all other impacts by SBC as part of the usual planning process.	No Modification.
Policy 7 response:(continued) I know of people living 100 meters from school having to drive to Highworth with their children everyday.	There is no secondary school in the BENP area but each new housing development is required by SBC to contribute towards school provision.	No Modification

STATUTORY CONSULTEES – The BENP Steering Group contacted all Statutory Consultees required and Local Parish Councils. Four Statutory Consultees replied

Swindon Borough Council

Comment	Response	NP Modification
General thoughts: the NPPF should be referred to as 'revised NPPF (February 2019)'.	yes	Replace all references to NPPF with - revised NPPF (February 2019)
All maps need a copyright (2019) statement, a North arrow and either a scale x:xx or a 'Not to scale' statement	yes	Orla please ensure this and use © Crown copyright. All rights reserved Swindon Borough Council 100024296 2019
You need to check that all the references to figures and maps are correct eg 7.16 refers to map 7 but the map in that sections is labelled Fig10?	yes	All insertions should be referred to as 'Fig x' and references checked
The strategic allocated site at Kingsdown is referred to many times within the draft BENP. It would be more precise to refer to it as a strategic or allocated site rather than 'urban development'.	yes	Please ensure revisions below capture the modification, however some references to 'urban development' are correct
It would also be helpful to readers to include a map showing the Kingsdown NC5 site so people could see its location relative to Blunsdon. One option could be to include SBLP 2026 Policy NC5 (map and wording) as an appendix as South Marston Neighbourhood Plan did..	yes	Add Text and Map as new Appendix K. Update appendix page and add bracketed ref to App K when NC5 referenced, not just mentioned
Page 2 - Paragraph 4, sentence 2 Suggestion: swap 'limits' for 'boundary'	yes	Change limits to boundary
Paragraph 5: Suggested rewording: 'has been prepared by Blunsdon Parish Council, the qualifying (accountable) body'	yes	Change to qualifying

Paragraph 7, sentence 1: Should the character area assessments and Village Design Statements, (VDS) be mentioned here also?	yes	Including a Village Design Statement and detailed character area assessments
Page 3 - 1.1 Sentence 1: Doesn't make sense? 'Constructed at the periphery of an adjacent to existing settlements'	yes rewrite	<p>Blunsdon has always been separated from the urban area of Swindon and has always been a rural community. However during the sixties, seventies and eighties it has grown organically around the core of the Village through infill and new housing. In parallel to this, large areas to the north of Swindon were the subject of substantial urban expansions (Abbey Meads, St Andrew's Ridge and Ash Brake).</p> <p>Since then through the development of the Swindon Borough Local Plan 2026 (SBLPOLICY 2026) north Swindon has grown massively through Redhouse, Oakhurst and Tadpole Garden Village. Part of the plan was the creation of the strategic allocated site of Kingsdown NC5 an urban extension to the North Swindon expansion into the BENP area.</p> <p>This expansion has led to a variety of local challenges including pressure on infrastructure, landscape and green space heritage assets, core services and existing resources like health care and provision of school places. All these combine to provide an opportunity for the village to utilise a neighbourhood plan, to have greater influence over development so that Blunsdon enjoys, in the words of the NPPF, "a high quality-built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being".</p>
1.2 and 1.3 : First sentence repeats some of the	yes rewrite	To this end the BENP was framed to help to

5 th sentence in 1.1 around “challenges”. This could be written more succinctly.		ensure a cohesive approach to the management of its sustainable growth. The constraints and challenges encountered have informed the following key objectives for this Neighbourhood Plan
Objective 4: ‘To ensure the preservation of local landscape and areas surrounding the village for the benefit of both residents, wildlife and the environment – Conserving Nature and the Environment.’: Add “to preserve the character of the area”	yes	To ensure the preservation of the character of the area, and local landscape and areas surrounding the village for the benefit of both residents, wildlife and the environment – Conserving Nature and the Environment
Page 4 - 1.5 To set out policies which....Bonus: Reads as a fifth purpose within 1.4. If it is, the text should be in a box	yes	Put 1.5 in a box and delete 1.5 and include box within 1.4. This changes the following numbering
1.6 Localism Act 2011 and NPPF 2012.: Update text: NPPF 2018 / 2019 revised, Old NPPF is 2012.	yes	provided by the Localism Act 2011 and revised NPPF (February 2019)
1.7 Insert ‘which’ between ‘compliance’ and ‘will’	yes	Insert ‘which’
Page 5 - Fig 2 Location of Blunsdon : Include black border around fig 2 as figure 1	yes	Black Border around fig 2
1.12 “...the general location of the district...”: Suggest replacement of “location of the district” with the words “local context”	yes	Blunsdon is located in and adjacent to the western limit of the Midvale Ridge National Character Area. Figs 2 and 1 respectively show both the local context of the district and the neighbourhood plan area within it.
Page 6 - 1.14 Last sentence : Suggest a different phrase such as deleting from the words “with Blunsdon” and inserting “to form the cohesive village of Blunsdon that we see today”	yes	1.14 Last sentence “This development has continued into the 20th and early 21st centuries as new houses were added to the original core settlement to form the cohesive village of Blunsdon that we see today.
Page 9 - 1.24: NPPF should be abbreviated and referred to as revised NPPF (Feb 2019)	yes rewrite	NPPF should be abbreviated and referred to as revised NPPF (Feb 2019)
1.26: Suggest this is amended:	yes rewrite	To reinforce this, a group of volunteers were

		asked to carry out Character Assessments across distinct parts of the village. These have been integrated into the VDS and have outlined principles within those areas which developers should incorporate when designing places, buildings and extensions. The design principles will be used to secure identity, character and distinctiveness and provide supplementary guidance to the Swindon Borough Local Plan 2016 and the Swindon Residential Design Guide 2016 in the determination of planning applications within the BENP area
Page 12 – 3.4: Include low density also?	yes	Please see rewrite of Page 12, Addendum 2
3.5: Perhaps add the phrase “while ensuring connectivity and integrated development”.	yes	Please see rewrite of Page 12, Addendum 2
3.6: Swap ‘urban development’ for ‘allocated strategic site’. Proposed new wording: ‘To benefit from the new sustainable links, rights of way and environmental enhancements to be delivered at the strategic allocated site of Kingsdown (SBLP 2026 Policy NC5)	yes	Please see rewrite of Page 12, Addendum 2
3.7: Consider adding something here to ensure “infrastructure” is not read as just roads – it is also about community facilities and public realm.	yes	Please see rewrite of Pages 12, 13, 27, 30 and 33, Addendum 2
3.14: For consistency with other bullet points amend to: Protect <u>ing</u> and improv <u>ing</u> sports facilities Encourag <u>ing</u> the addition of...	yes	Please see rewrite of Pages 12, 13, 27, 30 and 33, Addendum 2
3.17: Perhaps add “to mitigate against the disruption of these views and protect views to the village”	yes	Please see rewrite of Pages 12, 13, 27, 30 and 33, Addendum 2
2 nd objective : Add ‘such as the strategic	yes	Please see rewrite of Pages 12, 13, 27, 30 and 33,

allocated site at Kingsdown' to the end of the sentence		Addendum 2
Page 14 - Policy 1, BP 1: Insert 'with developers' after 'which encourages early interaction'	yes add as suggested	'which encourages early interaction with developers'
Page 15 - Para 4.7	yes	4.7 Sites that are shown in Appendix J (AECOM Report – Figure 2-1 and table 2.1.1) and those identified...
Para 4.8: After (see Appendix J) add AECOM Report – Figure 2-1 and table 2.1.1 in brackets	yes	(see Appendix J - AECOM Report – Figure 2-1 and table 2.1.1)
Table 1; Sites A B and D should be shown in plan or on Fig 7. Using numbers in Fig 7 and letters in Table 1 is confusing so better to opt for one or the other	yes	Replace Figure 7 Map with Appendix J Map denoting three allocated sites A, B and D.
4.11: You could add the planning application references for each of these sites to assist people in finding out more information?	yes	Notwithstanding, 521 dwellings have already been approved within the BENP area at: S/13/1223-61 & S/17/0455-15 - Hillside 76 dwellings S/15/0364 - Blunsdon Heights 57 dwellings S/14/1304 - Blunsdon Chase 69 dwellings S/16/2034-Reservoir site High St 52 dwellings S/17/0528 - Holdcroft 54 dwellings S/17/1032 - Golf Course 100 dwellings S/18/0405 - Sams Lane 70 dwellings S/19/0294 – Blunsdon Land 43 dwellings
Page 16 - 4.14 sentence1: After the first sentence state briefly what the age profile is i.e. ageing? Sentence 2: Add 'older' in front of local residents	Add as suggested	The age profile of current residents is set out in the Equality Impact Assessment in Appendix B and is defined as 'ageing'. By allocating small-scale housing development at a low density it is hoped that this will help meet the needs of older local residents wishing to remain in the village - particularly if bungalows are provided.
Page 17 – 4.17: Abbreviate to revised NPPF (Feb	yes	Replace NPPF with revised NPPF (Feb 2019)

2019)		
Policy 2, BP 3: Suggested rewording: 'they conserve and enhance the natural and historic built environment of the BENP. Where there is potential for development to result in harmful impacts, appropriate mitigation measures will need to be proposed.'	yes Add/change	they conserve and enhance the natural and historic built environment of the BENP. Where there is potential for development to result in harmful impacts, appropriate mitigation measures will need to be proposed
Page 18 - Policy 3 BP 2: Suggestion: 'Respecting the setting of the Broad Blunsdon and Lower Blunsdon Conservation Areas by conserving their special character and appearance.'	yes add	See separate rewrite Addendum 1
Pp 18/19 - 4.25 – 4.30: The areas identified should not be considered the only landscaped areas that contribute to the Blunsdon village character. Perhaps the text should reflect this.	No modification	See separate rewrite Addendum 1
Page 21 - 4.31 NPPF paragraphs 66 and 188: Out of date policy, old NPPF Para 66 should be changed to para 128 and Para 188 should be changed to para 39	change	Out of date policy, old NPPF Para 66 should be changed to para 128 and Para 188 should be changed to para 39
Page 21 - Policy 4: 3 rd para beginning 'Applications are to be...': You cannot require this, only encourage it so this needs rewording. It should be the final paragraph in the policy.	yes	Move this paragraph after the bullet points and change first sentence to 'To comply with the requirement of a Statement of Community Engagement applicants should be encouraged to demonstrate that the views...'
Page 22 - Policy 4 BP 2: Amend Design Guide to Design Code	Alter as suggested	Amend Design Guide to Design Code
BP 3: The Council cannot refuse to validate or determine a planning application at Kingsdown if engagement has not taken place in accordance with NP policy 4; This could be reworded to make it an action for the Parish Council by stating that	Alter wording	"the BENP community will engage with the developers of the Kingsdown urban extension in order to ensure that: - any area of non-coalescence or rural buffer is treated as a minimum standard (Policy 3 & Policy

<p>“the BENP community will engage with the developers of the Kingsdown urban extension....”</p>		<p>5)</p> <ul style="list-style-type: none"> - as many of the existing hedgerows and trees as possible are retained, and to allow enhancement and replacement where retention is not possible. This is to ensure net biodiversity gain, landscape character and the provision of a network of green infrastructure corridors (Policy 12) - the development provides key infrastructure, such as primary school, open space, pitches and a local centre; - local facilities are linked to existing or new rights of way encouraging sustainable movement to enable and encourage movement around the village by foot and bicycle ; - traffic mitigation measures required eg traffic calming & measures to minimise rat-running through Broad Blunsdon are carried out as per Policy NC5, SBCLP 2026
<p>BP 4: POLICY 3 and P5 should be Policy 3 and Policy 5 to avoid people thinking it means page 3 and 5. Is there any evidence to support minimum widths for the non-coalescence area. This needs to align with emerging LP Policies NC5 and NC2 and refer to the purpose of non-coalescence ie maintaining the character and identity of existing villages rather than to an arbitrary width.</p>	<p>yes</p>	<p>See above</p>
<p>BP 5: Change POLICY 12 to Policy 12. Insert ‘and trees’ after ‘hedgerows’ and refer to net biodiversity gain, landscape character and the provision of a network of green infrastructure corridors as the reason for retaining hedges and trees.</p>	<p>Amend text to read Policy 12 and insert ‘add trees’</p>	<p>See above</p>

BP 6: Change 'community centre' to 'local centre' as stated in Policy NC5. Replace 'children's facilities' with open space as this will include sports pitches and equipped play (LEAPs and NEAPs).	Reword as col 2	See above
BP 7 Ensuring local facilities are linked to existing or new rights of way : A stronger emphasis on the purpose of this point ie 'encouraging sustainable movement' is required here. Suggest insert 'to enable and encourage movement around the village by foot and bicycle'.	Change and add text col 2	See above
BP 8: This is unenforceable as the Council cannot refuse to validate/determine an application for Kingsdown because traffic mitigation has not been discussed. Although this would merely be a duplication of NC5 perhaps this BP needs to refer to the traffic mitigation measures required eg traffic calming & measures to minimise rat-running through Broad Blunsdon.	Delete bullet points 8	See above
4.35. National Planning Policy Framework (paragraph 188) : Out of date, now needs to refer to revised NPPF (Feb 2019) Para 188 should be changed to para 39.	yes	Amend to NPPF and para no to 39
Page 23 – 4.39: Delete the word themes they are urban design principles derived from LP policy DE1 quality of design.	Change as per col 2	This statement supports a number of SBCLP Policies and urban design principles derived from SBCLP Policy DE1 quality of design.
Policy 5 Para 2: Suggested rewording: 'Development proposals should demonstrate how they comply with the design principles contained within the VDS.'	Reword as suggested	'Development proposals should demonstrate how they comply with the design principles contained within the VDS.'
Is the VDS an appendix? If so, this should be stated here so that it can be easily read	yes	Add VDS in brackets at 4.39 after 'Village Design Statement' and add 'Appendix C.

		Alter 'Village Design Statement' to VDS at para 4.40
Page 25 - Typo - Para number should be 4.47. This paragraph should include something like ...'in the interest of promoting sustainable travel and in compliance with NPPF healthy living' etc...	Yes - Amend to accept text at the end of the sentence.	Typo - Para number should be 4.47. This paragraph should include after 'road safety, in the interest of promoting sustainable travel and in compliance with NPPF healthy living'
Policy 6 – para 1: Duplication of SBLP Policies TR1 and TR2 and NPPF 108 and 109 – therefore not needed.	yes	Amend to add 'as set out in SBCLP Policies TR1 and TR2 and NPPF Paras 108 and 109'
<p>Paras 2 & 3 : Suggested rewording:</p> <p>Traffic Congestion Proposals that accord with the policies in the Plan and result in improvements to the free flow of traffic in the village, promote road safety and minimise air, light and noise pollution will be supported.</p> <p>Road safety, traffic congestion and pollution are a priority for Blunsdon and developers are strongly encouraged to discuss the above traffic mitigation measures with the Parish Council at the earliest possible stage in the planning process.</p>	Yes change	<p>Traffic Congestion Proposals that accord with the policies in the BENP and result in improvements to the free flow of traffic in the village, promote road safety and minimise air, light and noise pollution will be supported.</p> <p>Road safety, traffic congestion and pollution are a priority for Blunsdon and developers are strongly encouraged to discuss the above traffic mitigation measures with the Parish Council at the earliest possible stage in the planning process.</p>
Page 26 - 4.55 Bicyclists p.40 refers to cyclists too : Terminology should be consistent. Use either 'bicyclists' or 'cyclists' not both.	yes	Change to cyclists
Page 27 - Suggest the inclusion of "approaches" to this last objective to embrace the work in the VDS	yes	Please see rewrite of Pages 12, 13, 27, 30 and 33, Addendum 2
Page 28 – Policy 7: Suggest that para 2 is moved to the end of the policy below the list referred to in para 1	Yes	Move paragraph 2 as suggested 'Proposals that...'
Page 30 - Add 'both within the design of each	yes	Please see rewrite of Pages 12, 13, 27, 30 and 33,

individual development and the wider environment.'		Addendum 2
Page 31 - Policy 8 para 1: You may not wish to be so prescriptive here. Suggested rewording: 'The BENP encourages proposals that will enable home working, co-working or provide new local employment opportunities, subject to the policies contained within the BENP and SBLP 2026 and subject to whether': 'PROVIDED THAT	Change text as suggested	'The BENP encourages proposals that will enable home working, co-working or provide new local employment opportunities, subject to the policies contained within the BENP and SBCLP and provided that: '
Page 32 - Policy 9: Comment from SBC CIL Manager: Suggested new Policy title: Infrastructure Requirements and Funding for Community Projects Insert additional wording at beginning: a) In the event that development is required to provide for on-site infrastructure e.g. different types of open space or other facilities that provide for wider public access and/or benefit, that may have an option to be either owned or managed by the Parish Council at its discretion, the landowners/developers will be expected to approach and discuss this with the Parish Council in advance of submission of any planning application to understand what the Parish Council's initial position is in respect of this. (this would cover both SBC LP policies and their own NP policies) b) In addition, where is it identified that development impact mitigation would best be delivered by means of an off-site financial contribution, under the circumstance where the potential responsibility for the investment of that contribution would lie with the Parish Council,	Add suggested text at a), b) and c) into Policy 9	Change Policy 9 to ' Infrastructure Requirements and Funding for Community Projects In the event that development is required to provide for on-site infrastructure e.g. different types of open space or other facilities that provide for wider public access and/or benefit, that may have an option to be either owned or managed by the Parish Council at its discretion, the landowners/developers will be expected to approach and discuss this with the Parish Council in advance of submission of any planning application to understand what the Parish Council's initial position is in respect of this. In addition, where is it identified that development impact mitigation would best be delivered by means of an off-site financial contribution, under the circumstance where the potential responsibility for the investment of that contribution would lie with the Parish Council, landowner/developers will be expected to liaise with the Parish Council in advance of the submission to understand what the current priorities of the Parish are in respect of that

<p>landowner/developers will be expected to liaise with the Parish Council in advance of the submission to understand what the current priorities of the Parish are in respect of that specific item.</p> <p>c) Any application submitted should supported by the submission of a statement that identifies what discussion with the Parish Council has taken place, and provisionally what agreement may have been made in respect of both on-site provision and/or off-site contributions as relevant.</p>		<p>specific item.</p> <p>Any application submitted should supported by the submission of a statement that identifies what discussion with the Parish Council has taken place, and provisionally what agreement may have been made in respect of both on-site provision and/or off-site contributions as relevant.</p>
<p>Policy 9 - Para 1 sentence 1: Add 'for direct local benefit' after Community Infrastructure Levy. Add 'deed of planning obligation' after 'under a S106'</p>	Add text	Add 'for direct local benefit' after Community Infrastructure Levy
<p>Para 1: Suggested rewording: 'For s106 obligations, these will be agreed at the time they are secured, and the invest of CIL and other income will be agreed at the time it is received or bid for as appropriate'</p>	No modification	
<p>6.7: Should this not read development not developers in the first sentence?</p> <p>As Education is a statutory requirement for the LEA to provide for I would recommend that the Parish also refers to more locally beneficial policies so at the end of the sentence perhaps add, 'deliver sustainable development, and at a more local level provide for open space.</p>	yes	Change from developers to development
<p>6.8: At the end add 'and especially where the Parish Council has ownership and/or responsibility over the provision of new, and/or enhancement/ improvement of existing</p>	No modification	

infrastructure’.		
Page 33 - Suggest it may be beneficial to identify that open spaces beyond those highlighted in fig 9 are also important in contributing to the character of the village.	yes	Please see rewrite of Pages 12, 13, 27, 30 and 33, Addendum 2
Page 34 - 7.6: In addition to the report findings there is also an opportunity to encourage better connectivity between developments. Perhaps a sentence should be included to highlight the importance of developing walkable neighbourhoods.	yes	Add new sentence at bottom to state ‘opportunities should be maximised to enhance connectivity between developments for walkers and cyclists’.
Policy 10 : Comment from SBC Landscaping: It would be good if the NP could reflect the Parish’s statutory duties towards biodiversity conservation e.g. requiring net biodiversity gain from development. This could be dealt with by a short statement within policy 10 (GI etc.) which includes a reference to SBC policy EN4? It would also be good to be more proactive regarding trees/community. Could the link in policy 10 be bolstered with a statement that emphasises the particular case for trees regarding landscape, ecology, health and well being, climate change resilience and other environmental services.	yes	Add to start of first paragraph ‘The Parish Council has a statutory duty to ensure net biodiversity gain (SBCLP Policy EN4) and in order...’ Change ‘Map 6’ to ‘Fig 9’ Add allotment sites to the map in Fig 9 and maybe some photos Ian will send a revised map and photos.
Page 35 - 7.7 ‘as shown above’: Suggest changing the word “shown” to “discussed”.	Alter text	change the word “shown” to “discussed”.
NPPF (paras 76-77). And 73-74.: Out of date, needs updating to revised NPPF (Feb 2019) Para 76-77 should be changed to para 99-100. Para 73-74 should be changed to para 96-97.	Change/amend	needs updating to revised NPPF (Feb 2019) Para 76-77 should be changed to para 99-100. Para 73-74 should be changed to para 96-97.
7.7 - 7.10: Suggest the inclusion of “approaches to the village” to tie in with the VDS	No modification	

Page 37 - 7.17 – 7.19: Suggest the inclusion of “approaches to the village” to tie in with the VDS	yes	Replace text to 7.19 after - to be cognisant of the ‘valued views in and out of the village and the approaches from the West, North and East as detailed in the VDS, Character Assessments (appendix C). Also to preserve...’
Page 39 – Policy 12: Suggest this is not only amenity value, may be character and/or biodiversity value too so this should be stated	yes	Add ‘and biodiversity value’ after ‘amenity value’
Final para : Suggested rewording: ‘When appropriate, proposals should include information as to how trees and hedgerows will be protected during construction.	Reword final paragraph	‘When appropriate, proposals should include information as to how trees and hedgerows will be protected during construction.’
Page 40 – 7.32: Old NPPF – needs updating to NPPF 2018/2019 Para 125 should be changed to para 180.	Alter accordingly	Change NPPF ref

Nearby Parishes/Councils

No Comments Received		
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Natural England

Natural England does not have any specific comments on this draft neighbourhood plan	Noted	No modification
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Historic England

No Comments Received		
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Network Rail

No Comments Received		
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Environment Agency

No Comments Received		
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Thames Water

<p>We recommend the Neighbourhood Plan include the following policy/supporting text: PROPOSED NEW WATER/WASTEWATER INFRASTRUCTURE TEXT</p> <p><i>“Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades.”</i></p> <p>“The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing</p>	<p>Noted, however planning permission is granted by the LPA who will be fully aware of the need to ensure adequate water and wastewater infrastructure and will seek to ensure the developer makes appropriate provision for surface water drainage.</p>	<p>No modification</p>
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<p>conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.</p> <p>With regard to surface water drainage, Thames Water request that the following paragraph should be included in the Neighbourhood Plan: <i>“It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding”.</i></p>	As above	No modification
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Highways England

Support but no comments		
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Housing Developers

The Steering group advertised the Consultation locally to attract Representations from local landowners and developers and there were representations from seven developers.

Dev 1 DPDS Consulting Group (Broadbush)

<p>Policy 1</p> <p><i>Do not agree as the Policy has not been informed by up-to-date and robust evidence on local housing needs. It is clear that the borough has a</i></p>	<p>The current Local Plan requires ‘up to 100’ dwellings to be built within all the Villages (of which Blunsdon is a tier three settlement - SBCLP</p>	No modification
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<p><i>significant shortfall in housing land supply which they are currently reviewing.</i></p> <p><i>There is no Site Allocation Development Plan Document (DPD) relevant to Blunsdon.</i></p>	<p>Policy SD2) Upwards of 500 dwellings have however been approved within Blunsdon within the Plan period. The BENP Steering Group (BENPSG) therefore recognises that Blunsdon has already more than contributed toward housing need across the Borough.</p> <p>Further allocations within the Neighbourhood Plan Area will be considered by SBC as part of the Local Plan Review. It is not the role of the Blunsdon Neighbourhood Plan to resolve the whole of the Borough's housing needs, and although the BENPSG is proposing housing development, this is only small-scale development consistent with the size of the village, and which has community support.</p>	
<p><i>No up to date SHMA available therefore the current housing need is unknown but the BENPSG can request an indicative figure from LPA</i></p>	<p>The LPA has been asked for an indicative figure but none has been forthcoming, in recognition of the scale of development having already been consented in recent years, proportional to the size of the settlement.</p>	No modification
<p><i>The BENP has not justified why they have allocated housing sites for only 20 dwellings</i></p>	<p>The Steering Group have decided to allocate only small-scale housing of up to 9 dwellings in response to public support, only being available for three sites had majority community support, the development of which totals 20 dwellings.</p>	No modification

<p><i>Due to the future SBCLP review the BENP should keep up to date on local housing needs.</i></p>	<p>There is currently no <i>local</i> housing need for Blunsdon per se, but if the SBCLP Review apportions an element of Borough – wide housing need to the Neighbourhood Plan area then the Neighbourhood Plan will be reviewed.</p>	<p>No modification</p>
<p><i>The BENP evidence base and plan making should have been informed by the latest SHELAA evidence.</i></p>	<p>The BENP evidence base and plan making did take account of the latest information available at the time, and should not be substantially delayed by re-visiting the site shortlisting process, as this would be premature of the SBCLP Review process.</p>	<p>No modification</p>
<p><i>We do not agree with SBC that our client's site should have been rejected and discounted by the BENP site assessment process</i></p>	<p>Noted however a key attribute of a site's suitability is its deliverability, and there were no material considerations which indicated otherwise.</p>	<p>No modification</p>
<p><i>The updated NPPF February 2019 has redefined a major development to include that a site has an area of 0.5 hectares or more. Therefore two of the BENP allocated sites are now classified as major development.</i></p>	<p>Noted</p>	<p>No modification</p>

<p>Policy 3</p> <p><i>DPDS do not agree. We consider this policy should be deleted as it creates confusion with SBLP policy NC5 Kingsdown. Area 1 as defined in figure 8 of the BENP is already designated an area of Non-coalescence on the SBLP Policies Map, therefore not required within the BENP.</i></p> <p><i>Our client site must be excluded from Area 1 of the 'Area of Non-Coalescence' defined in Figure 8 of the BENP for reasons as set out.</i></p> <p><i>We respectfully request that bullet points 1 and 2 are removed from this Policy as they do not relate to Areas of Non Coalescence.</i></p> <p><i>Add para 4.25 to policy 3</i></p> <p><i>Footnote 6 should be deleted as it leads to confusion between the BENP and the wording in criterion f) of Policy NC5 of the SBLP.</i></p> <p><i>Delete policy as it does not comply with Basic Condition E</i></p>	<p>Disagree – retention of the rural buffers is necessary in order to have a cohesive and comprehensive Policy, which builds on the existing SBLP NC5 Area, but extends it in light of recent development. Policy 3 is therefore necessary to continue to protect Blunsdon's separate identity from the NC5 Kingsdown allocation.</p> <p>Disagree, as no material considerations to indicate a departure from SBLP Policy.</p> <p>Disagree but please see revised policy 3 which no longer refers to areas of non-coalescence.</p> <p>Disagree – 4.25 refers to the development supported by Policies 1 and 2, and does not extend to land within the Policy 3 rural buffers</p> <p>Agreed.</p> <p>Disagree, as the Plan is in general conformity with the Development Plan, subject to the modification above.</p>	<p>Yes Modification - Policy revised to clarify the difference between the NC5 Non-coalescence area and the proposed rural buffers. Addendum 1</p> <p>No modification.</p> <p>See revised Policy Three, Addendum 1</p> <p>See revised Policy Three, Addendum 1</p>
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<p>Suggest New Policy called Reserve Housing Site Policy to ensure that emerging evidence of housing need is capable of being addressed and enable an element of future proofing.</p> <p><i>Want to be notified of the next stages of the BENP process.</i></p>	<p>Disagree – as there is no actual housing requirement for Blunsdon there is no need for any additional allocation; and in any case all sites with majority community support have been proposed for allocation.</p> <p>Noted.</p>	<p>Yes Modification, see revised Policy Three Addendum 1</p> <p>No modification.</p> <p>No modification.</p> <p>No modification.</p>
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Dev 2 - Tetlow King / Kingsman Estates Ltd (Blunsdon Land – Site B)

<p>Policy 1</p> <p>TKP supports the proposed allocation of Housing Site B identified in Policy 1 of the Neighbourhood Plan as 'Blunsdon Land Ltd' at land off the B4019. Our representation provides planning justification for the proposed allocation of the site for housing. We do however consider that more than nine dwellings should be allocated at the site to make the most efficient use of land at the sustainable site.</p>	<p>Noted. The Steering Group have decided only to allocate small-scale housing due to public support not being available for larger scale allocations.</p> <p>As established within the Development Brief for Site B, our proposed allocation also includes land to be set-aside for a football pitch, which is needed within the village, therefore substantial community benefit would result from the site's development in accordance with the proposed</p>	<p>No modification</p>
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<p>The merits of developing the site for new residential development include the site's sustainable location, well-related to both Broad Blunsdon and the built-up area of Blunsdon St Andrew in the north of Swindon; its accessibility to local services and employment opportunities; the self-contained nature of the site, with the ability to provide defensible boundaries; the single ownership of the site; and the guarantee that much needed affordable housing will be delivered through our client's interests on the site.</p> <p>It is important that the Neighbourhood Plan fully acknowledges the need for new housing across the Borough and the Council's progress in meeting this need.... A residual need for 6,500 new dwellings up to 2036 across the Borough.</p>	<p>allocation.</p> <p>The current Local Plan requires 'at least 100' dwellings to be built within all the Villages of which Blunsdon is a secondary rural settlement (reference table 1 Policy SD2 SBLP2026 and Part 2 – Paragraph 2.1, Figure 3 map of Swindon Borough) Upwards of 520 dwellings have however been approved within Blunsdon within the Plan period.</p> <p>The Neighbourhood Plan Steering Group therefore feel that Blunsdon has already more than contributed toward housing need across the Borough.</p> <p>Further allocations within the Neighbourhood Plan Area will be considered by SBC as part of the Local Plan Review, however it is not the role of the Neighbourhood Plan to resolve the Borough's housing needs, and community support is only</p>	<p>No modification</p>
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<p>The allocation of Site B for only 9 dwellings is not in accordance with para 123 of the NPPF, which states <i>“Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site. In these circumstances: a) plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible.”</i> (Underline added)</p> <p>Policy SD1 ‘Sustainable Development Principles’ of the Local Plan adds that: <i>“To enable the delivery of sustainable development and support sustainable communities in the Borough all development proposals will:...use land and resources...in an efficient and effective way.”</i></p> <p>Policy HA2 ‘Affordable Housing’ of the Swindon Local Plan 2026 requires development of 15 or more dwellings to provide 30% affordable homes. Therefore, limiting the allocation to nine units also restricts the delivery of affordable housing.</p>	<p>available for small-scale development consistent with the size of the village.</p> <p>The NPPF refers to occasions where there is a shortage of housing – as Blunsdon has had substantially more housing than required within the Plan period there is no need for additional housing – the proposed allocation is additional, and intended to be in the form of large family homes, along with a football pitch and car park, as proposed within the Development Brief.</p> <p>Blunsdon has had more than sufficient affordable housing to meet local needs, therefore there is no need for additional affordable housing (nor large scale developments which would enable it).</p> <p>The Steering Group consider that a small scale development of 9 family homes along with a</p>	<p>No modification</p> <p>No modification</p>
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<p>The current live outline planning application at Housing Site B demonstrates that the sustainable site can accommodate up to 43 dwellings and deliver community benefits including 13 affordable homes, over one hectare of public open space in the east half, pedestrian links to the adjacent Holdcroft site and public right of way.</p> <p>Whilst we welcome and support the allocation of Housing Site B for residential use, we consider that the site should be more efficiently used to accommodate up to 43 dwellings and the community benefits described above.</p>	<p>football pitch and associated car park would be a more appropriate use of this edge of settlement site.</p>	<p>No modification.</p>
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Dev 3 - Pegasus – East of Sams Lane

<p><u>Policy 1</u></p> <p>Paragraph 4.10 of the draft BENP identifies that there have already been levels of development significantly in excess of the requirements of the adopted Local Plan. There therefore remains no additional need for housing within the Parish to accord with the Local Plan.</p>	<p>The need for small scale development recognised by 79% of the respondents our consultation influenced the decision to allocate land for small-scale development.</p>	<p>No modification</p>
	<p>The Neighbourhood Plan wishes to take a</p>	<p>No modification</p>

<p>The draft BENP has not been informed by any assessment of housing need. There has been no assessment of the number of households in affordable need or with other specific housing needs within the parish and there has been no consideration of whether these needs could be met in accordance with the adopted Local Plan. The draft BENP does not therefore identify a housing need and defers to that identified in the adopted Local Plan. Nevertheless, the draft BENP proposes three housing allocations without identifying a need for these.</p> <p>Appendix J to the BENP identifies that each of the proposed allocations will give rise to some environmental harm. Without an identified need for housing, such environmental harm cannot provide for sustainable development.</p> <p><u>Policy 2 and 3</u></p> <p>Furthermore, the Borough Council are in the process of reviewing the Local Plan. The draft BENP takes no account of this and as an inevitable result, the BENP will immediately become out-of-date upon adoption of the Local Plan Review.</p> <p>The progression of a Neighbourhood Plan in</p>	<p>positive approach to sensitively planned, proportionate development in addition to recent housing consents.</p> <p>All development arguably has some environmental harm; and the three proposed allocations have each scored highly against accepted planning criteria within our scoring matrix.</p> <p>BENP can only base its policies on those in the current Local Plan and will review any policies in line with any future Local Plan review.</p> <p>Disagree - National Planning Policy clearly recognises the value of Neighbourhood Plans where the Local Plan is not up-to-date. To delay the Neighbourhood Plan when the SBCLP Review is at such an early stage would in fact render the community's engagement and progression of the</p>	<p>No modification</p> <p>No modification</p> <p>No modification</p>
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<p>the absence of an up-to-date Local Plan, and without any consideration of the needs which exist in the Neighbourhood Plan area (which would be provided through that Local Plan), is not an effective use of time and resources. The resultant Neighbourhood Plan will shortly become out-of-date and will thereby not provide the powerful planning tool as anticipated by national guidance as it will be afforded reduced weight in decision making. It is therefore recommended that the Neighbourhood Plan is paused to enable the Local Plan to be adopted to provide the appropriate strategic framework under which the Neighbourhood Plan should be prepared.</p> <p><u>Call for Sites</u> The BENP site allocations consultation only considered previously identified sites (through the 2017 Call for Sites and the 2013 SHELAA) suitable for up to 9 dwellings, accordingly only 9 sites were 'nominated'. L&Q Estates control land to the east of Broad Blunsdon, as identified on the enclosed Site Location Plan. The BENP Steering Group have declined to assess my client's Site, despite our previous</p>	<p>NP as a waste of time.</p> <p>During our Call for sites process we received no representation from your client's site and considered sites from that call plus suggested sites from the available SHLAA at that time. To re-institute the entire site allocations process by reviewing the very recently published 2019 SHELAA sites would inappropriately delay production of the Neighbourhood Plan.</p> <p>Community support for development through the Neighbourhood Plan remains limited to small-scale development, therefore your clients interests would be best served with regard to the forthcoming SBCLP Review.</p>	<p>No modification</p> <p>No modification</p>
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<p>representations (August 2018) and further correspondence (September 2018).</p> <p>It is acknowledged that the PPG states that those preparing Neighbourhood Plans can make use of their local authorities plan making evidence base for Neighbourhood Plan preparation. Land to the east of Broad Blunsdon is identified within the Council's SHELAA Report 2019 as Site S0377. The SHELAA concludes the Site is suitable for residential development, available, and possibly achievable. 'Possibly achievable' is defined in the SHELAA Report as 'may be developable by 2036 if the issues highlighted can be overcome'. Given that the SHELAA Report 2019 is now publicly available, the BENP should reference this material when assessing sites.</p> <p><u>Policy 3 - Areas of Non-Coalescence</u></p> <p>Policy 3 of the draft BENP seeks to create areas of non-coalescence, where land should remain open countryside, unless development proposals are an essential requirement directly related to the economic or social needs of the rural</p>	<p>As stated above, use was made of the Local Authority's plan-making evidence base at the appropriate time.</p> <p>The proposed rural buffers identified in the BENP extend, rather than replace the NC5 Area, and are necessary to preserve the character and identity of the Village - the main vision stated within the BENP.</p>	<p>No modification</p> <p>See revised Policy Three, Addendum 1</p> <p>No modification</p>
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<p>community, or part of a farm diversification scheme.</p> <p>The Local Plan already identifies an area of non-coalescence within Policy NCS as set out on Figure 13 of the Local Plan. This area has been examined and found to be sound within the adopted Local Plan as providing appropriate protection between Blunsdon and Kingsdown. Any alternative area of non-coalescence would not be justified and would depart from the adopted Local Plan.</p> <p>Furthermore, the identified justification for the policy area 4 – 'land north of Local Plan Policy NCS (Kingsdown) and B4019' is to ensure the land does not join up with the NC5 area to create an elongated urban expansion.</p> <p>The BENP incorrectly states (paragraph 1.15) that "The BENP area is situated within the National Character Area (NCA) named as the Mid Vale Ridge NCA 09." As illustrated by the Landscape Character Areas plan at Appendix 4 of LVSA of the BENP, the northern parts of the BENP</p>	<p>Noted thank you we will revise the text accordingly</p> <p>Noted –The village is currently highly susceptible to speculative applications and appeals due to the Borough-wide lack of housing – a Made Neighbourhood Plan will not be out of date so long as a 3 year housing land supply can be demonstrated, thereby reducing this risk until such time as the Local Plan is fully up-to-date.</p> <p>There is no community support (essential for production of a Neighbourhood Plan) for such a scale of housing to be allocated through the Plan.</p>	<p>Yes Modification, paragraph to be revised as below; The BENP area is situated within both the National Character Areas named as the MidVale Ridge NCA09 and Upper Thames Clay Vales NCA 108.</p> <p>No modification</p>
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<p>area lie within a separate NCA - 108 Upper Thames Clay Vales</p> <p><u>Land to the East of Broad Blunsdon</u></p> <p>To ensure there are sufficient site allocations to meet the housing need, we suggest the inclusion of our client's Site as an allocation in the BENP. Initial assessments by my client indicate that it would have the capacity for in the region of 150-200 dwellings. A positive and proactive approach to site allocations at this stage will ensure that needs are met (including pressing needs for affordable housing) and that sites can come forward in a plan led way. If this approach is not followed and the BENP is found to be out of date, then the village will be more susceptible to speculative applications and appeals.</p>		
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<p><u>Policy 1.</u> Objection. Within the context of meeting the housing need in the SLP we object to the omission of the site as an allocation and raise concerns regarding the proposed allocations in that none will address wider infrastructure issues nor offer any mitigation in terms of highways matters.</p> <p>The site is identified as “deliverable” in the SBC SHELLA published in February 2019. The site assessment report from AECOM dated June 2018 does not reflect the latest evidence base.</p> <p>The site would contribute 30% affordable housing that would assist in addressing the considerable shortfall in affordable housing delivery.</p> <p>The June 2018 is assessment report is flawed. For example site 9 is assessed as being adjacent to the settlement boundary, which has not been amended to reflect sites with planning permission.</p> <p><u>Policy 2.</u> Objection. The policy should have added flexibility to enable sites to come forward that provide wider infrastructure benefits in the area; sites so brought forward should be enabled regardless of being outside settlement boundaries.</p>	<p>The SLP contains sufficient proposals to mitigate existing infrastructure needs through s.106/CIL requirements whilst the small scale of the allocated sites will not significantly impact highways concerns.</p> <p>The 2019 SHELLA was not published at the time of the site allocations short-listing process and was the appropriate evidence base at the time.</p> <p>Over 150 affordable dwellings have been consented in Blunsdon in recent years therefore the shortfall of such housing is not within Blunsdon per se.</p> <p>The assessment is based upon the established boundaries at the time it was conducted.</p> <p>Disagree - Strategic infrastructure (and any necessary enabling development) will be planned by SBC as part of the Local Plan Review.</p> <p>Each application / appeal is determined on its</p>	<p>No modification</p> <p>No modification</p> <p>No modification</p> <p>No modification</p> <p>No modification</p>
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<p><u>Policy 3.</u></p> <p>Objection. We object to the area of the site being proposed as an area of non-coalescence. We question the need for an area of non-coalescence between Blunsdon and Swindon. The Inspectors conclusion when hearing the appeal on the land north of High Street, Blunsdon, was that the A419 would ensure separation between Blunsdon and Swindon.</p>	<p>merits, and the Inspectors decision with regard to an entirely separate site does not negate the value of an extended rural buffer.</p>	<p>See revised BENP Policy 3, Addendum 1</p>
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Dev 5 Turley – Broadbush, GT

<p><u>Policy 1</u></p> <p>As part of the justification for Policy 1 (Allocation of Sites for Housing) it is noted at paragraph 4.11 that a number of residential development sites have been granted planning permission in Blunsdon. However, given the not insignificant size of many of these developments it seems surprising to us that the opportunity has not been taken to amend and update the settlement boundary of the village to incorporate these sites and ensure they become part of the village. This would appear to be a denial of the changed</p>	<p>The settlement boundary will be considered by SBC in their Local Plan Review.</p>	<p>No modification</p>
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<p>circumstances at the village and a missed opportunity to consider the settlement boundary more holistically.</p> <p>We would also question the statement at paragraph 4.14 that allocating small-scale housing development at a low density will help meet the needs of local residents wishing to remain in the village, particularly bungalows for older people.</p> <p>Whilst bungalows are one potential option for older people's accommodation no due consideration has been given to other options, particularly for those wishing to live in a property but with access to care and shared facilities. This is an option actively being considered for the Land opposite Beech Lea.</p> <p><u>Policy 3</u></p> <p>We are also concerned by Policy 3 (Areas of Non-Coalescence). Criterion f) of Swindon Borough Local Plan (SBLP) Policy NC5 establishes the principle of non-coalescence to protect the character of Broad Blunsdon, including Broadbush. Whilst the intention of the non-</p>	<p>Allocating small-scale additional housing will indeed help increase the range of housing available, especially if the requirements of the Development Briefs are adhered to.</p> <p>Housing with care / sheltered housing has a critical mass, meaning it cannot be developed as a small-scale facility.</p> <p>The Neighbourhood Plan is entitled to establish new rural buffers, and in so doing does nothing to undermine NC5.</p>	<p>No modification</p> <p>No Modification</p> <p>See revised BENP Policy 3, Addendum 1</p>
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<p>coalescence area would be retain the area as part of the countryside, Policy NC5 does allow for small scale development that involves the re-use, conversion or extension of existing buildings or is an essential requirement directly related to the economic or social needs of the rural community. Policy NC5 is identified in the SBLP as a strategic policy and therefore in line with paragraph 29 of the National Planning Policy Framework (NPPF) the BENP should therefore not seek to undermine Policy NC5.</p> <p>However Policy 3 and footnote 6 goes beyond Policy NC5 establishing further areas of non-coalescence and tighter restrictions on the types of exceptional development allowed in the non-coalescence area between Kingsdown and Blunsdon. The types of essential social and economic requirement that could be considered as exceptional development identified in footnote 6 is overly restrictive and does not give due consideration to other types of social and economic infrastructure that could be appropriately located in the non-coalescence area and help deliver essential services to Blunsdon. We therefore consider the approach in</p>	<p>It is accepted that the Policy should be in line with SBC policy with regard to the types of exceptional development permitted.</p>	<p>Yes Modification, Delete Footnote 6 of Policy 3 to align with SBC Local Plan Policy NC5. Addendum 1</p>
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<p>Policy 3 and footnote 6 to be in conflict with SBLP Policy NC5 and is therefore contrary to paragraph 29 of the NPPF. Policy 3 and footnote 6 should therefore be amended accordingly.</p> <p>Furthermore, we are concerned by the lack of clarity at Figure 8 in terms of the proposed boundaries for the non-coalescence areas. Figure 8 lacks any discernible key and the overlaying of other policy designations makes it difficult to demarcate the proposed non-coalescence areas.</p>	<p>Agree key required, together with clarity on the mapping.</p>	<p>See revised BENP Policy 3, Addendum 1</p>
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DEV 6: Wood/Bellway Turnpike South

<p>Response on behalf of Bellway Homes Ltd (June 2019)</p> <p>Wood Environment & Infrastructure Solutions UK Ltd (Wood) are instructed by Bellway Homes Ltd to submit representations to the Blunsdon East Neighbourhood Plan (BENP) in support of their 2.2 hectare site at Turnpike Road (the Site) (SHELAA ref S0460, AECOM site ref 5, see Appendix A for site location plan). The Site can have a key role to play in meeting local housing needs at a time when Swindon cannot demonstrate a deliverable land supply and where</p>	<p>The NP is only allocating small-scale development commensurate with the size of the village, and as a result of community consultation. There is no additional housing requirement for Blunsdon per se.</p>	<p>No modification</p>
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<p>housing requirements and settlement boundaries are undergoing review.</p> <p>We are keen to meet with Blunsdon Parish Council to discuss the opportunities presented by our client's Site, share the findings from our surveys and assessments completed to date and seek your feedback and views as our proposals progress.</p> <p><u>Summary:</u> Our client objects to the BENP because it does not meet the basic conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended) - specifically basic conditions (a), (d) and (e) - for the following reasons:</p> <p>The BENP conflicts with national planning policy and guidance, contrary to basic condition (a) and the achievement of sustainable development (basic condition (d)). This is because: o The BENP seeks to restrict development at a point when Swindon Borough Council (SBC) cannot demonstrate a 5-year supply of housing land, the adopted Swindon Borough Local Plan (SBLP) 2026's housing policies are out-of-date¹ and SBC is preparing a new local plan.</p> <p>The BENP conflicts with the objective to boost the supply of homes, an objective at the heart of achieving 'sustainable development' in the National Planning Policy Framework (NPPF)</p>	<p>Suggest site is put forward to SBC Local Plan Review as the BENP has no mandate from the community for such large scale development.</p> <p>Disagree – the BENP actually proposes additional development over and above both the Adopted Local Plan figure for tier 3 settlements, and in the context of over 520 dwellings having been consented within the village over recent years</p> <p>See above – there is no such conflict as a sustainable level of additional development appropriate to the size of the village is proposed.</p>	<p>No modification</p> <p>No modification</p> <p>No modification</p>
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<p>(Paragraphs 8, 11, 16 & 59), contrary to basic condition (d).</p> <p>The BENP conflicts with National Planning Practice Guidance (NPPG) paragraph 009 (Reference ID41-009-20190509) (NPPG009) which requires local planning authorities and qualifying bodies to share evidence and work together to take account of emerging plans to avoid future conflicts between strategic policies. The new SBLP being prepared (with preferred options to be published in July 2019) will review housing numbers and settlement boundaries with clear potential for policy conflicts if the two plans are not aligned. Evidence from the recent Strategic Housing Land Availability Assessment (SHELAA) and Strategic Housing Market Assessment (SHMA), for example, should be shared.</p>	<p>The BENP cannot (and should not) be expected to single-handedly overcome the Borough's housing land supply issues.</p> <p>There is no such conflict between SBC's strategic policies and no emerging plan published – the Local Plan Review is only at Issues and Options stage. Aligning the Neighbourhood Plan with a plan in such infancy would be premature.</p>	<p>No modification</p>
<p><u>Policy 1:</u></p> <p>Allocation of Sites for Housing' only allocates 3 sites for development, comprising 20 dwellings. However additional sites need to be allocated to provide flexibility, to boost the supply of homes and deliver sustainable development in accordance with the NPPF. Our client's site at Turnpike Road – a site considered favourably in SBC's SHELAA – should be allocated for development and the settlement boundary redrawn to provide a flexible and positively prepared BENP (further justification provided in section 3b).</p>	<p>No additional sites need to be allocated in order to attain sustainable development, especially as Blunsdon is a tier 3 settlement, and such strategic development ought to take place within Swindon or alternatively Highworth or Wroughton which have the scale of facilities and services capable of supporting such development.</p>	<p>No modification</p>

<p><u>Policy 2:</u> Housing Development on non-allocated sites' is based on the settlement boundaries defined in SD2 of the SBLP, a policy which is out-of-date. Policy 2 would therefore be rendered out-of-date as soon as the BENP is made under NPPF11 & 14 given just 2.7 years housing land supply.</p>	<p>Disagree – the Neighbourhood Plan – when deemed sound at Examination, would not immediately become out of date, when the only settlement boundary plan published is that of the Adopted Swindon Borough Local Plan.</p>	<p>No modification</p>
<p><u>Policy 3:</u> Areas of Non-coalescence' does not accord with strategic Policy NC5 in the SBLP. NC5's non-coalescence policy is a strategic policy specifically designed to prevent the coalescence of the Kingsdown allocation with Blunsdon. Our clients' site at Turnpike Road SHELAA site ref: S0460, AECOM site ref 5), which forms part of proposed Area 3, has no such role and does not form part of Policy NC5. The BENP is therefore seeking to use Policy NC5 for something that it is not intended to do, subverting the purpose of that policy. This direct conflict with a strategic policy in the SBLP means that Policy 3 fails basic condition (e). This policy should therefore be deleted.</p> <p>Furthermore, we agree with AECOM's conclusions in their study supporting the BENP, which identifies 'no' coalescence issues for the Site (page 5). The identification of the Site within Area 3 therefore conflicts with the AECOM study and should be removed from the non-coalescence area. The Site is already partly developed, and with permitted development to the north</p>	<p>Disagree entirely – adoption of rural buffers does nothing to subvert the purposes of SBC'S existing NC5 Non Coalescence Area. There is no conflict with Adopted NC5.</p> <p>Disagree – the LVSA is not a Policy document but supporting evidence about the visual sensitivity of the BENP area. The proposed rural buffers are set to protect the landscape character of the village</p>	<p>See revised BENP Policy 3, Addendum 1</p> <p>No Modification</p>

<p>(S/OUT/18/2007) and has strong established boundaries. The AECOM study also confirms how visually well-contained the Site is (page 3), being “not visible from the surrounding locations” and “existing landscape being of poor quality”.</p> <p><u>Detailed justification</u></p> <p>Basic conditions and overarching approach to the BENP Before a neighbourhood plan can process to referendum it must be tested against a set of basic conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended).</p> <p>The basic conditions that the BENP must meet are as follows: (a) having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order, (d) the making of the order contributes to the achievement of sustainable development, (e) the making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).</p> <p>Our clients are objecting to the BENP as the plan does not accord with basic conditions (a), (d) and (e) in particular.</p> <p>Boosting the supply of homes and delivering sustainable development: There are two key issues here:</p> <ol style="list-style-type: none"> 1. The strategic policies in the SBLP, upon which the BENP is based, are clearly out- 	<p>Disagree – and rather disingenuous to suggest the NP will immediately become out of date with regard to an Adopted Settlement Boundary, only to then suggest the Plan fails to meet the basic conditions of being in accordance with the Adopted Plan.</p>	<p>No modification</p>
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<p>of-date given a 2.7 year supply of housing land. To seek to adopt a BENP based on this settlement boundaries conflicts with basic condition (a) given it will restrict the ability to boost the supply of homes, a fundamental aim of the NPPF (including NPPF15). This also results in conflict with basic condition (d) given that boosting the supply of homes is central to the achievement of 'sustainable development' in the NPPF. Furthermore, it will result in a BENP which is inflexible and not capable of responding to rapid change, contrary to NPPF11.</p>	<p>Repetition of earlier point – see above. Which settlement boundary would your client deem not out-of-date, given that new edge-of-settlement housing developments in the village are being approved at a consistent rate.</p>	<p>No modification</p>
<p>2. A new plan is being prepared by SBC, with preferred options due to be consulted on in July 2019. The local plan review process will involve a review of current settlement boundaries across the borough reflecting new housing requirements. NPPG009 is clear that the qualifying body and the local planning authority should work together to share evidence (including housing needs) to minimise the future risk of conflict between policies: "...Although a draft neighbourhood plan or Order is not tested against the policies in an emerging local plan the reasoning and evidence informing the local plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested. For</p>	<p>As stated, the NP is not to be tested against emerging Local Plan policy, especially in its infancy.</p> <p>The NPPG 'Housing and economic land availability assessment' para 009 clearly states that Plan makers 'may wish to consider alternative site size thresholds' to the stated 5 dwellings and above.</p> <p>The NP will indeed become the most up-to-date plan, and given significant weight in decision making if SBC obtain a 3 year housing land supply.</p>	<p>No modification</p> <p>No modification</p>

<p>example, up-to-date housing need evidence is relevant to the question of whether a housing supply policy in a neighbourhood plan or Order contributes to the achievement of sustainable development.</p> <p>Where a neighbourhood plan is brought forward before an up-to-date local plan is in place the qualifying body and the local planning authority should discuss and aim to agree the relationship between policies in: • the emerging neighbourhood plan • the emerging local plan (or spatial development strategy) • the adopted development plan with appropriate regard to national policy and guidance.”</p> <p>There is no evidence that such a process has taken place, resulting in the real risk that the BENP could be rendered immediately out-of-date as soon as the new SBLP is adopted. NPPG009 is clear that where policy conflict exists between plans, it is the most recently adopted plan which takes precedence. The issues raised in Points I and II clearly risk making a BENP which is immediately or soon rendered out-of-date.</p> <p>Our recommendation is for the parish council to work alongside SBC to consider suitable allocations and review settlement boundaries to help ‘future proof’ the</p>	<p>It will not become immediately out of date for reasons set out above.</p> <p>SBC have been consulted on the draft NP and have not objected to the proposals.</p>	<p>No modification</p> <p>No modification</p>
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<p>BENP, ensure flexibility and minimise the risk of policy conflict. Allocating our client's site at Turnpike Road (SHELAA ref S0460 and AECOM site ref 5) can have a key role to play as part of a more flexible plan, reflecting the positive conclusions of SBC's SHELAA.</p> <p><u>Comments on specific policies:</u> Our clients are also objecting to specific policies within the BENP as follows.</p> <p><u>Policy 1:</u> Allocation of sites for housing By allocating just 3 sites for development at a time when settlement boundaries are out-of-date and SBC cannot demonstrate a 5-year supply of housing land Policy 1 conflicts with the NPPF's objectives to boost housing supply and deliver sustainable development. In order to future proof the BENP, provide flexibility and minimise the risk of future conflicts with the new SBLP, additional sites should be allocated, including our client's site at Turnpike Road, for the following reasons.</p> <p>The Site's suitability is considered favourably in SBC's recently published SHELAA - evidence which should be taken into account in preparation of the BENP. Land at 12, Turnpike Road (S0460) has been identified as 'Developable' and could bring forward up to 60 dwellings between 2023/24 – 2027/28</p>	<p>This would merely replicate the Local Plan Review</p> <p>Further replication of the point answered earlier – no community support exists for medium to large scale allocations through the NP. We are proposing to allocate all sites which obtained majority support and passed scrutiny in site selection. To suggest that allocating additional land (which would still not rectify the Borough's housing land shortage) would future proof the BENP is completely un-founded.</p>	<p>No modification</p> <p>No modification</p>
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<p>(Page 19).</p> <p>In terms of the AECOM study it is important to highlight that its evidence is generally supportive with respect to environmental, landscape/visual and coalescence issues (issues which appear central to the BENP) for the following reasons....</p> <p>This can therefore be changed from 'red' to 'green' in AECOM's assessment</p> <p><u>Policy 2:</u> Policy 2 sets out criteria for planning applications for minor developments on non-allocated sites and development outside of the settlement boundaries defined under SBLP Policy SD2. However, policy SD2 is out-of-date given the lack of 5 year housing land supply. NPPF11's 'tilted balance' is already engaged as explained. Furthermore, the settlement boundaries and housing numbers are undergoing review as part of the new SBLP currently being prepared. Our client therefore objects to this policy because it is not positively prepared, is inflexible and will restrict the NPPF's aim to boost the supply of</p>	<p>2019 SHELAA conclusion noted, but to delay production of the BENP by starting the site allocations process again and short-listing sites against the SHELAA would not obtain community support, and would not be an effective use of resources, particularly as the SBC Local Plan Review is to form preferred options from review of the SHELAA sites.</p> <p>The majority of undeveloped land within the BENP area has in fact been 'green lighted' by the 2019 SHELAA – demonstrating the need for a NP to be Made in the interim, in order to provide a plan-led approach to decision making within the NP area.</p> <p>As stated above, we are not instructing AECOM to review all sites now 'green-lighted' and to re-commence the short-listing process as this would negate community support for the NP as obsolete.</p> <p>Disagree that Policy 2 can be out of date through the use of an Adopted (and the only published)</p>	<p>No modification</p> <p>No modification</p>
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<p>homes at a time when land is in short supply in Swindon Borough. This policy therefore conflicts with basic condition (a). With boosting housing supply central to the achievement of sustainable development (NPPF15), the policy also fails basic condition (d).</p> <p><u>Policy 3:</u> Policy 3 identifies five areas of non-coalescence which are shown on Figure 8 of the BENP. The policy states that the areas identified should remain open countryside and free of development unless a development proposal accords with Policy EC5 of the adopted SBLP. Our clients Site forms part of proposed noncoalescence Area 3. However, we object to Policy 3 because it conflicts with a strategic policy in the SBLP, therefore failing basic condition (e). Policy NC5: Kingsdown is a strategic policy which defines an area of non-coalescence intended to protect land between Kingsdown and Blunsdon village. Our clients Site, which forms part of Area 3, has no such function and does not form part of that policy. Draft Policy 3 is seeking to modify strategic policy NC5 for an entirely different purpose and should therefore be deleted given a clear conflict with basic condition (e). In any case, we agree with the findings of the AECOM study which confirms 'no' issue of coalescence (page 5).</p> <p><u>Conclusions</u> There is a considerable risk that the BENP could be rendered out-of-date as soon as it is 'made'. A</p>	<p>settlement boundary.</p> <p>The tilted balance will not apply once SBC achieve a 3 year housing land supply.</p> <p>Policy 3 does not seek to modify NC5 but rather to add to it, with additional rural buffers</p>	<p>No modification</p> <p>See revised BENP Policy 3, Addendum 1</p>
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<p>2.7 years supply of housing land would result in the housing policies being out-of-date (NPPF11 & 14 would engage the 'tilted balance') and the new SBLP could adopt new housing requirements, settlement boundaries and allocations, conflicting with what is included in the BENP. NPPG009 is clear that where conflict exists between policies, the most recently adopted plan takes precedence. There are clear conflicts with basic conditions (a), (d) and (e) as explained in these representations.</p> <ul style="list-style-type: none"> • The BENP would restrict future housing development at a time when there is a shortage of deliverable housing sites in Swindon and national policy is clear that housing supply should be boosted as a key part of delivering 'sustainable development' (conflict with national planning policy under basic condition (a) and not achieving sustainable development under basic condition (d)). This affects draft policies 1, 2 and 3 in particular. Additional sites should be allocated to provide a flexible and positively prepared plan, including our client's Site at Turnpike Road (shown at Appendix A, AECOM site ref 5 and SHELAA ref S0460). The SHELAA is positive regarding the suitability and development potential of the Site, and The AECOM study confirms that the Site-specific constraints are limited, and is particularly positive regarding landscape, visual and coalescence matters (issues which appear key to the BENP). The issues that have been raised in the AECOM study are capable of being addressed and we can share the findings of our ongoing technical work with the Parish 	<p>Repetition of all earlier points and doesn't warrant further response.</p>	<p>No modification</p>
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<p>Council once available (e.g. the outcome of our transport assessment and environmental surveys). • In addition, draft Policy 3 (areas of non-coalescence) should be deleted since it seeks to modify a strategic policy from the SBLP and use it for a purpose for which it was not intended. That policy is a specific policy relating to coalescence between Kingsdown and Blunsdon. Conflict with a strategic policy is contrary to basic condition (e). In any event, our client's Site has no function preventing the coalescence of Kingsdown and Blunsdon and should be removed from Area 3. The AECOM study specifically rules out any other coalescence issues with respect to the development of this particular site, so the identification of the Site within Area 3 conflicts with the BENP's evidence base. We recommend that work on the BENP is paused pending a process of joint working and the sharing of evidence with SBC and the new SBLP that they are preparing, drawing on the findings of the SHELAA, SHMA and other work which is underway. This would ensure consistency with NPPG009 and minimise the risk of conflict between the two plans. Our client's Site at Turnpike Road is a visually well-contained and deliverable site which could have a key role to play in meeting existing and future needs in a sustainable location, complementing future growth planned for Kingsdown. We are keen to meet with the Parish Council to discuss the opportunities presented by this Site and seek your feedback as soon as possible.</p>		
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Dev 7 - Castlewood Commercial Properties Ltd (Sams Lane)

<p><u>Policy 1</u></p> <p>As part of the justification for Policy 1 (Allocation of Sites for Housing) it is noted at paragraph 4.11 that a number of residential development sites have been granted planning permission in Blunsdon. However, given the not insignificant size of many of these developments it seems surprising to us that the opportunity has not been taken to amend and update the settlement boundary of the village to incorporate these sites and ensure they become part of the village. This would appear to be a denial of the changed circumstances at the village and a missed opportunity, especially given that the proposed development of Land at Sams Lane included provision for a new village shop which is not mentioned elsewhere in the BENP, even in discussions of community facilities.</p> <p>We would also question the statement at</p>	<p>This will be reviewed by SBC in the Local Plan Review.</p> <p>The proposal referred to has only been consented in Outline and is therefore yet to be implemented.</p>	<p>No Modification</p> <p>No Modification</p>
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<p>paragraph 4.14 that allocating small-scale housing development at a low density will help meet the needs of local residents wishing to remain in the village. There is no evidence for this and it artificially limits the number of dwellings to be provided which will not help address the issues of affordability identified in paragraph 4.21.</p>	<p>Allowing small-scale housing will supplement recent large-scale housing growth within the village. Significant numbers of affordable dwellings have already been consented within the village.</p>	<p>No Modification</p>
<p>Policy 3</p> <p>We are also concerned by Policy 3 (Areas of Non-Coalescence). Criterion f) of Swindon Borough Local Plan (SBLP) Policy NC5 establishes the principle of non-coalescence to protect the character of Broad Blunsdon, including Broadbush. Whilst the intention of the non-coalescence area would be retain the area as part of the countryside, Policy NC5 does allow for small scale development that involves the re-use, conversion or extension of existing buildings or is an essential requirement directly related to the economic or social needs of the rural community.</p>	<p>The Neighbourhood Plan is entitled to establish new rural buffers, and in so doing does nothing to undermine NC5.</p>	<p>See revised BENP Policy 3, Addendum 1</p>
<p>Policy NC5 is identified in the SBLP as a strategic policy and therefore in line with paragraph 29 of the National Planning Policy Framework (NPPF)</p>	<p>It is accepted that the Policy should be in line with SBC policy with regard to the types of exceptional development permitted.</p>	<p>See revised BENP Policy 3, Addendum 1</p>

<p>the BENP should therefore not seek to undermine Policy NC5. However Policy 3 and footnote 6 goes beyond Policy NC5 establishing further areas of non-coalescence and tighter restrictions on the types of exceptional development allowed in the non-coalescence area between Kingsdown and Blunsdon. To do so is contrary to paragraph 29 of the NPPF and Policy 3 and footnote 6 should be amended accordingly.</p> <p>Furthermore, we are concerned by the lack of clarity at Figure 8 in terms of the proposed boundaries for the non-coalescence areas. Figure 8 lacks any discernible key and the overlaying of other policy designations makes it difficult to demarcate the proposed non-coalescence areas.</p> <p>Furthermore the proposed non-coalescence area appears to be a blanket restriction, which does not appear to be supported by a technical evidence base. This 'broad brush' approach does not provide sufficient flexibility for sites such as 'Land at Sams Lane', which represent a logical rounding off of the settlement. There should be the opportunity for such sites to come forward for consideration, supported by their own</p>	<p>Agree key required, together with clarity on the mapping.</p> <p>The rural buffers follow the settlement boundary around the east and northern edges of the village, as SBC's Policy NC5 is limited to the southern edge only. It is considered important to protect these areas, as they have been identified as playing an important role in the setting of the village, within the LVSA. Without such rural buffers Blunsdon's hilltop setting and special character (protected within the SBC Local Plan) will be lost.</p>	<p>See revised BENP Policy 3, Addendum 1</p> <p>No Modification</p>
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technical evidence.		
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Developer 8 Turley Kingsdown Lane

<p><u>Settlement Boundary</u></p> <p>As part of the justification for Policy 1 (Allocation of Sites for Housing) it is noted at paragraph 4.11 that a number of residential development sites have been granted planning permission in Blunsdon. However, given the not insignificant size of many of these developments it seems surprising to us that the opportunity has not been taken to amend and update the settlement boundary of the village to incorporate these sites and ensure they become part of the village.</p>	<p>The settlement boundary will be settled within the Swindon Local Plan Review.</p>	<p>No modification</p>
<p><u>Policy 1 Allocation of Small Sites for Housing</u></p> <p>We would also question the statement at paragraph 4.14 that allocating small-scale housing development at a low density will help meet the needs of local residents wishing to remain in the village. There is no evidence for this and it artificially limits the number of dwellings to be provided which will not help address the issues of affordability identified in paragraph 4.21.</p>	<p>Evidence was obtained through consultation with local residents in the selection of sites process.</p> <p>It is not possible to address or amend the Policy</p>	<p>No modification</p>

<p><u>Policy 2 Kingsdown NC5</u> We would suggest Policy 2 (Housing Development on Non-Allocated Sites) does not give due consideration to the potential for development around certain parts of the edge of Kingsdown Strategic Allocation as this will soon become a new settlement in the BENP area with its own settlement boundary yet Policy 2 focuses only on Blunsdon. The currently unallocated triangle of land to the north-west of the Kingsdown Strategic Allocation sandwiched between the Strategic Allocation and the non-coalescence area represents a logical extension of the Strategic Allocation and could help fund new infrastructure and services in Blunsdon through developer obligations.</p> <p><u>Policy 3 Area of Non Coalescence</u> We are also concerned by Policy 3 (Areas of Non-Coalescence). Criterion f) of Swindon Borough Local Plan (SBLP) Policy NC5 establishes the principle of non-coalescence to protect the character of Broad Blunsdon, including Broadbush. Whilst the intention of the non-coalescence area would be retain the area as part of the countryside, Policy NC5 does allow for small scale development that involves the re-use, conversion or</p>	<p>NC5 in SBCLPas it is a Strategic Allocation, and outside the remit for a Neighbourhood Plan.</p> <p>Agree to remove Footnote 6 to bring Policy 3 in-line with SBC Local Plan Policy NC5</p>	<p>No modification</p> <p>See revised BENP Policy 3, Addendum 1</p>
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<p>extension of existing buildings or is an essential requirement directly related to the economic or social needs of the rural community. Policy NC5 is identified in the SBLP as a strategic policy and therefore in line with paragraph 29 of the National Planning Policy Framework (NPPF) the BENP should therefore not seek to undermine Policy NC5. However Policy 3 and footnote 6 goes beyond Policy NC5 establishing further areas of non-coalescence and tighter restrictions on the types of exceptional development allowed in the non-coalescence area between Kingsdown and Blunsdon. To do so is contrary to paragraph 29 of the NPPF and Policy 3 and footnote 6 should be amended accordingly.</p> <p><u>Figure 8</u> Furthermore, we are concerned by the lack of clarity at Figure 8 in terms of the proposed boundaries for the non-coalescence areas. Figure 8 lacks any discernible key and the overlaying of other policy designations makes it difficult to demarcate the proposed non-coalescence areas</p>	<p>Agree key required, together with clarity on the mapping.</p>	<p>See revised BENP Policy 3, Addendum 1</p>
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ADDENDA

ADDENDUM 1 – REWRITE OF POLICY 3 RURAL BUFFERS

Policy 3: Rural Buffers

Intent

- 4.22 To ensure that the village of Blunsdon retains its individual character as a rural village and remains a distinct entity from the Swindon urban area.
- 4.23 The BENP Landscape & Visual Sensitivity Analysis identifies a number of key views within the designated BENP Area which should be preserved and the creation of rural buffers is essential to this objective.
- 4.24 To facilitate the objectives of SBCLP 2026 specifically paragraphs 3.26, 5.86 and 5.107 and SBCLP policies SD2 and NC5f.
- 4.25 To mirror the policies for other non-urban village settings as set out in the SBCLP 2026 particularly policies RA2a, NC1g and NC3e, HA5 and paragraph 5.127.
- 4.26 To meet the environmental objectives set out in The National Character Area Profile for the Midvale Ridge 109.

Policy 3 – Rural Buffers

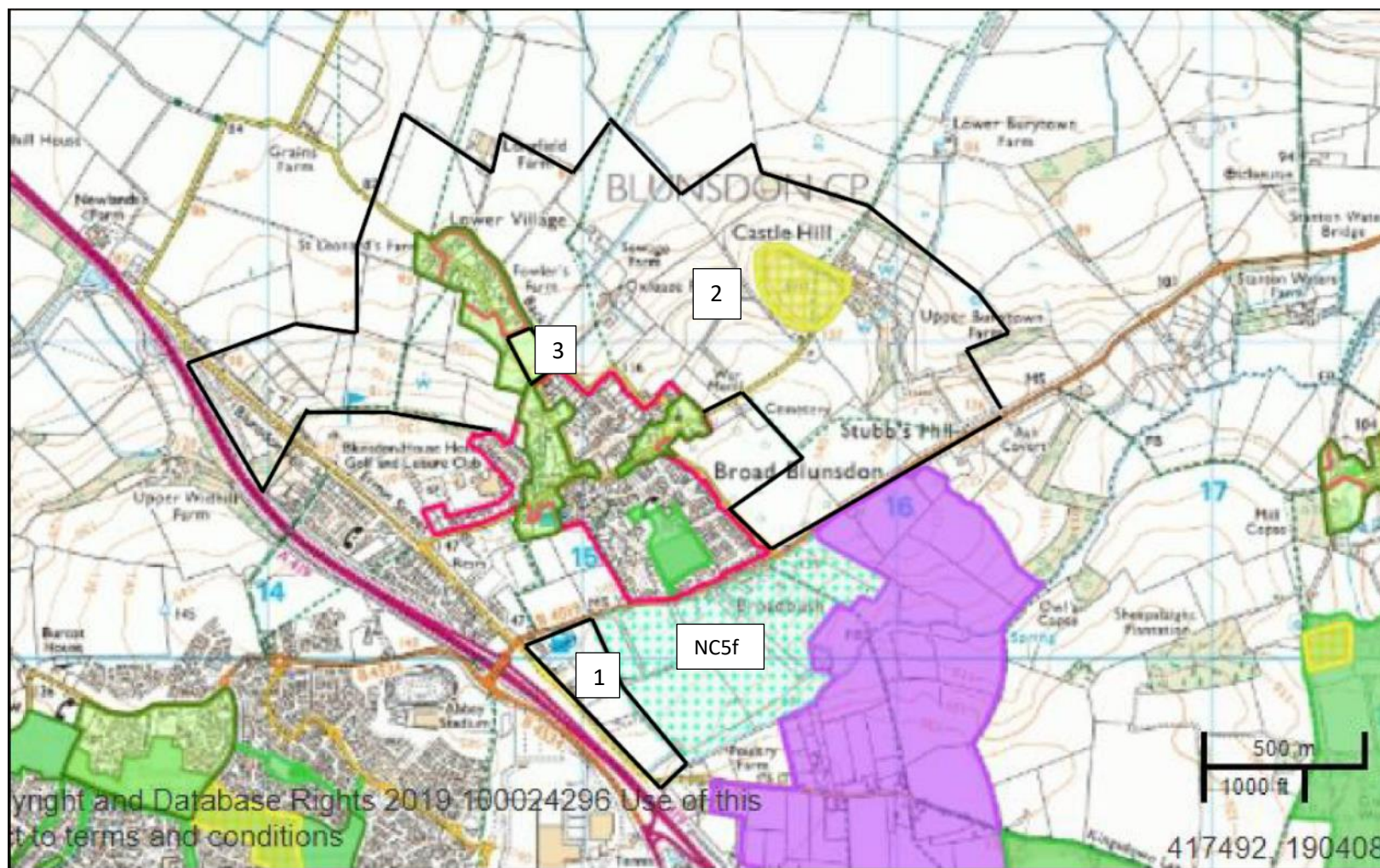
The character and identity of Blunsdon Village will be preserved and enhanced by:

- The establishment of three rural buffers as shown on Map 8 below which should remain as open countryside.
- Ensuring that Blunsdon remains a separate and distinct entity separated from the Swindon Urban area.
- Respecting the local landscape character including its setting and views into and out from the village.

- Respecting the setting of the Broad Blunsdon and Lower Blunsdon Conservation Areas by conserving their special character and appearance
- Development proposals in these Rural Buffers will only be supported where they are in accordance with SBLP 2026 Policy EC5 (Farm Diversification) or are an essential requirement directly related to the economic or social needs of the rural community². Where there is potential for development as set out in this policy and which results in harmful impacts, appropriate mitigation measures will need to be proposed.

DRAFT

² E.g. Local Open Space, allotments, recreation and sports facilities that do not harm the visual separation of Blunsdon from adjacent urban areas.



Key: Proposed Areas of Separation Rural Settlement Boundary Conservation Areas Ancient Monument Kingsdown NC5 Kingsdown NC5 Area of Non Coalescence

Map ref	Description	Reasons for designation
NC5f	Land to the south of the B4019 between the Village and the allocated strategic site of Kingsdown NC5	SBCLP 2026 under policy NC5 establishes a principle of non-coalescence between the new development and the existing settlement as follows: f. The character and identity of Broad Blunsdon, including Broadbush, shall be protected by a principle of non-coalescence between the settlements. The area designated by the BENP covers the area already identified by SBC in the Local Plan 2026.
1	Land to the west and adjacent to the NC5 non-coalescence area	This is the final area of land between the village and the A419 and the urban expansion of Swindon. This area of green space between Blunsdon village and the urban area of Swindon and Kingsdown NC5 fully complies with SBCLP 2026 policy NC5 which states “The character and identity of Broad Blunsdon, including Broadbush, shall be protected by a principle of non-coalescence between the settlements.”
2	Land surrounding the Village envelope, following the contours of the Mid Vale Ridge	This area is important to ensure that any development adjacent to the settlement boundary to the east of the village does not join up with the Kingsdown NC5 area and create an urban expansion stretching from the south, across the B4019 and up to the existing settlement boundary close to both St Leonards Church and the local cemetery. “The character and identity of Broad Blunsdon, including Broadbush, shall be protected by a principle of non-coalescence between the settlements.” Allocation of this area is critical to preserve the overall tranquillity of the village particularly that of the local cemetery. This area surrounding the historic Stubb’s Hill Anti-Aircraft battery also supports the SBCLP policy EN10, in protecting the historic environment, including listed buildings and any archaeological features. (Archaeological features in this location are listed in the Wiltshire and Swindon Historic Environment Record as MWI 16873 Stubb’s Hill Battery and MWI 14649 Undated trackway.)
3	Land between Upper and Lower Village formed by Ivy Lane, Front Lane, Back Lane and the wooded area south of Grove House	This area of land is the clear dividing line between Upper and Lower Villages. The Lower Blunsdon Conservation Area Appraisal states “Open space between the built form of Lower Blunsdon and Broad Blunsdon separates the two settlements and maintains the individual identity of each.” In addition, a planning inspector stated that “I agree that the field [referring to the above paddock]...play[s] a vital role in maintaining the separate identities of the two parts of Blunsdon.” Ref: T/APP/X3920/A/88/103837/P4 29th March 1989

Justification

- 4.27 In order to determine the extent of the rural buffers, each area above was assessed with the following principles in mind:
- topographical features - hills, ridges, valleys, which if breached would adversely affect a settlement's separate distinctiveness
 - visual coalescence - views into and out of settlements which should remain free from further development to retain the openness landscape character and setting to the village – using an assessment of the surrounding countryside and each settlement's relationship to it through a LVSA (Connected Landscapes LVSA appendix I) and
 - defensible boundaries – appropriate boundaries such as roads, rivers or fields
- 4.28 The BENP area consists of the village of Blunsdon, a number of conservation areas, and areas of open, mainly agricultural, countryside and the BENP area should continue to exist as an area separated from the urban area of Swindon.
- 4.29 The BENP supports reasonable, orderly and well-designed small-scale developments which are directly related to the economic or social needs of the rural community and retains and enhances the character of the BENP area
- 4.30 The concept of rural buffers is in line with a number of planning requirements, both National and as established by SBC, particularly:
- NPPF paragraph 170; 'Planning policies and decisions should contribute to and enhance the natural and local environment by:
 - protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
 - recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
 - minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
 - preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans;
 - SBCLP 2026 paragraphs 3.26, 5.86 and 5.107 and SBCLP policies SD2 and NC5f.

- This policy mirrors the policies for other non-urban village settings within the SBC area and is therefore derived from the SBCLP 2026 particularly policies RA2a, NC1g and NC3e, HA5 and paragraph 5.127 and fully in compliance therewith.
- Although not carried forward into the current SBCLP 2026 the immediately preceding version SBCLP 2011 (ENV10, ENV24) required the creation of 'rural buffers' to ensure that villages surrounding Swindon did not become part of the urban area.

4.31 During consultations held with local residents, particularly from the responses to question 19 of the questionnaires collated in April 2014, 71% of respondents identified areas to ensure the separation of the village from the urban areas of Swindon. These responses formed the basis for the rural buffers contained in this policy.

4.32 Based on outputs from consultations in November 2017 the Parish Council commissioned an independent Landscape & Visual Sensitivity Analysis ("LVSA") (Appendix I) from Connected Landscapes. This report concluded (section 6.3 of the LVSA) that "The balance between built form and the more natural environment (albeit one that is heavily managed through agriculture) which characterises the local landscape is assessed as being of medium sensitivity to appropriately-located small-scale development, but high sensitivity to large-scale development, especially any which substantially extends or lies outside of the existing settlement boundary."

4.33 This BENP policy complies with proposals for the strategic site at Kingsdown, set out in policy NC5 of the SBCLP, and has been extended to include the requirements of Blunsdon based on other adopted NP's within the Swindon area.

ADDENDUM 2 - TEXTURAL MODIFICATIONS TO BENP PAGES - 12, 13, 27, 30 and 33.

Page 12

A PLACE PEOPLE WANT TO LIVE.

- 3.4. To maintain the village character of Blunsdon by managing development on the scale envisaged in the SBCLP. In practical terms this will be limited to small scale low density developments over the plan period.

- 3.5. To maintain areas of separation to protect the unique identity of Blunsdon and prevent coalescence with adjacent, existing and proposed urban areas such as the strategic allocated site at Kingsdown (SBLP 2026 Policy NC5) while ensuring connectivity and integrated development.
- 3.6 To benefit from the new sustainable links, rights of way and environmental enhancements to be delivered at the strategic allocated site of Kingsdown NC5 urban development.

The VDS character assessments (CA) should also be used to influence the future design of areas such as Kingsdown, for example CA7) -Broadbush and CA8) Kingsdown Lane
- 3.7. To ensure the objectives above are achieved through collaborative solutions for infrastructure and road safety and to ensure that Blunsdon grows sustainably with regard to suitable community facilities’.

A PRIDE IN OUR HERITAGE

- 3.8. To protect and enhance the heritage and historic sites within the BENP area for the benefit of present and future residents and the community.
- 3.9. To ensure developments and alterations are sympathetic and appropriate.
- 3.10. To recognise and promote the area’s heritage and history
- 3.11. To register and protect Assets of Community Value within the BENP area.
- 3.12. To protect valued views in and out of the village and the approaches from the West, North and East as detailed in the VDS, Character Assessments.

SUPPORTING THE COMMUNITY

- 3.13. To ensure opportunities for home working and employment on existing sites and to consider future use of land for employment where this would be compatible in size and scale with the village setting.
- 3.14. To enhance the lifestyle of the Community by:
 - ◆ Working with partners to ensure access to superfast broadband network to support employment and leisure activities;

- ◆ Improving footpath and cycle links;
- ◆ Maintaining and improving existing open spaces;
- ◆ Providing allotment space;
- ◆ Protecting and improving sports facilities and play areas
- ◆ Encouraging the addition of open space and green infrastructure both within the design of each individual development and the wider environment.

CONSERVING THE ENVIRONMENT

- 3.15. To preserve, improve and enhance the green infrastructure, open spaces and environmental assets within the BENP area
- 3.16. Through support of SBCLP policies EN1, EN2, EN4 and EN5 to support development of the community forest and provide habitats that support and improve the biodiversity of the area to include the protection and retention of existing trees and hedgerows.
- 3.17. To preserve special views from the hilltop village to mitigate against the disruption of these views and protect views to the village.
- 3.18. To reduce light pollution to minimise risks to health, hazards to road users and to encourage the presence of nocturnal wildlife.

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A PLACE PEOPLE WANT TO LIVE

Objectives	Policies
To maintain the village character of Blunsdon by managing development on the scale envisaged in the SBCLP. In practical terms this will be limited to small scale low density developments over the plan period.	P1 – Allocation of sites for housing P2 – Housing Developments on non-allocated sites

To maintain areas of separation to protect the unique identity of Blunsdon and prevent coalescence with adjacent, existing and proposed urban areas such as the strategic allocated site at Kingsdown (SBLP 2026 Policy NC5) while ensuring connectivity and integrated development.	P3- Rural Buffers
To benefit from the new sustainable links, rights of way and environmental enhancements to be delivered at the strategic allocated site of Kingsdown NC5 urban development. The VDS character assessments (CA) should also be used to influence the future design of areas such as Kingsdown, for example CA7) -Broadbush and CA8) Kingsdown Lane	P4– Early Community Engagement with Developers P5 – Preserving the design & character of Blunsdon Village
To ensure the objectives above are achieved through collaborative solutions for infrastructure and road safety and to ensure that Blunsdon grows sustainably with regard to suitable community facilities’.	P6 – Road Safety, traffic congestion and pollution P9 - Funding for Community projects

BENP Page 27

A PRIDE IN OUR HERITAGE

Objectives	Policies
To protect and enhance the heritage and historic sites within the BENP area for the benefit of present and future residents and the community.	P5 – Preserving the design & character of Blunsdon Village
To ensure developments and alterations are sympathetic and appropriate.	P5 – Preserving the design & character of Blunsdon Village
To recognise and promote the area’s heritage and history	P5 – Preserving the design & character of Blunsdon Village P7 – Protection of Community facilities and locally important assets
To register and protect Assets of Community Value within the BENP area.	P7 – Protection of Community facilities and locally important

	assets P9 - Funding for Community projects
To protect valued views in and out of the village and the approaches from the West, North and East as detailed in the VDS, Character Assessments.	P11 - Preservation of Views of local importance

BENP Page 30

SUPPORTING THE COMMUNITY

Objectives	Policies
To ensure opportunities for home working and employment on existing sites and to consider future use of land for employment where this would be compatible in size and scale with the village setting.	P8 – Employment
To enhance the lifestyle of the Community by:	
♦ Working with partners to ensure access to superfast broadband network to support employment and leisure activities;	P8 – Employment
♦ Improving footpath and cycle links;	P9 – Funding for community projects
♦ Maintaining and improving existing open spaces;	
♦ Providing allotment space;	
♦ Protecting and improving sports facilities and play areas	P10 – Green Infrastructure, Open Space and Sports Facilities
♦ Encouraging the addition of open space and green infrastructure both within the design of each individual development and the wider environment.	P5 – Preserving the visual character of Blunsdon Village P10 – Green Infrastructure, Open Space and Sports Facilities

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CONSERVING THE ENVIRONMENT

Objectives	Policies
To preserve, improve and enhance the green infrastructure, open spaces and environmental assets within the BENP area	P10 – Green Infrastructure, Open Space and Sports Facilities
Through support of SBCLP policies EN1, EN2, EN4 and EN5 to support development of the community forest and provide habitats that support and improve the biodiversity of the area to include the protection and retention of existing trees and hedgerows.	P12 – Protection of Trees and Hedgerows
To preserve special views from the hilltop village to mitigate against the disruption of these views and protect views to the village.	P11 – Preservation of views of local importance P9 – Funding for community projects
To reduce light pollution to minimise risks to health, hazards to road users and to encourage the presence of nocturnal wildlife.	P13 – Dark Skies

ADDENDUM 3 - OTHER TEXTURAL MODIFICATIONS

Review of BENP Regulation 14 Submission Draft - Other Modifications

Page No	Modification
1	Delete the word Policies after the "Themes ie section 4,5,6 and 7 Add 'Appendix K – Kingsdown NC5 Policy and Map'
2	Para 4 After the last word Parish insert 'to the east of the A419.'
	Para 5 1st line For consistency delete Blunsdon East Neighbourhood Plan and brackets and inverted commas around BENP so it just reads BENP.
	Para 6 line 2 delete "it's" insert "the Parish's"
	Para 6 line 5 delete Blunsdon East NP and replace with BENP * Can this be done throughout the document?
4	Para 1.6 line 1 – delete most of 1st line leaving The BENP,
8	Para 1.20 line 1 - delete "our and insert "the BENP "

10	Para 2.1 line 2 – delete “Blunsdon East Development Plan” insert “BENP” without the brackets
11	1st line Delete ‘Our’ Vision insert ‘The’ Vision
13	Delete Title POLICIES just leave title as Objectives and Policies
24	Para 4.43 line 2 – change “our” to “the”
27	Delete Title POLICIES just leave title as Objectives and Policies
30	Delete Title POLICIES just leave title as Objectives and Policies
33	Delete Title POLICIES just leave title as Objectives and Policies
36	Para 7.12 line 5 – delete “And” insert capital T There
	Move Table 3 to page 37 and move to page 36 after para 7.16, Policy 11 in green box currently on page 37
37	Fig 10 make black arrows more visible
	Fig 11 is too small to be readable
38	Para 7.23 ends with inverted commas – delete
39	Last line in large green box – delete “of” insert “for”
General	Check Contents page last so it matches up with all the changes With Policy 3 rewrite the numbering has changed too.
Char Ass 2	Include Turnpike on shading with the Ermin St CA and check words are still OK for both streets