Town Centre Movement Strategy

Statement of Consultation

September 2020

1. Introduction

1.1 This consultation statement has been prepared in accordance with Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The statement sets out who was consulted in the preparation of the Town Centre Movement Strategy and how those consultations were considered.

2. Purpose

2.1 The Town Centre Movement Strategy (TCMS) sets out objectives for movement within the town centre and a series of broad schemes intended to deliver those objectives. Defining a vision and a strategy is essential if movement objectives are to be fully integrated into regeneration initiatives.

2.2 The Council Plan 2019-2020 places emphasis on the role of the town centre as a focus of sustainable growth. Pledge 3(c) confirms the importance of an effective and efficient transport network in supporting and facilitating that growth. The Movement Strategy responds to that aim; it is a multi-modal strategy that aims not only to improve the accessibility of the Town Centre but also to improve the environment and with it, the quality of life of those who live there and those who visit.

3. When did consultation take place?

3.1 Public consultation on the draft Movement Strategy took place between 22nd July and 15th September 2019. The results of the consultation, together with a TCMS document that had been amended to reflect the consultation responses, were presented to Cabinet on 25th March 2020.

4. Who was consulted?

4.1 In accord with the Town and Country Planning (Local Planning) (England) Regulations, a copy of the draft TCMS document was uploaded to the consultation pages of the Swindon Borough Council website and hard copies of documents were made available at the Civic Office reception. The opening of the consultation period was advertised in the Swindon Advertiser, with details given of the various methods available to access the document and to make comments. These included the setting up of a dedicated email address.

4.2 In parallel, a series of consultation presentations and meetings took place with specific stakeholders, including the following:

- 25 members of the public via the online questionnaire
- 3 members of the public direct to the email inbox
- The Broad Street Area CC
- The Wilts & Berks Canal Trust
- The Motorcycle Action Group
- Ward Members
- South Swindon Parish Council
- Swindon Cycle Campaign
- Swindon Bus
- Stagecoach Buses
- Swindon Taxi Forum
- Swindon Civic Voice
- Historic England

4.3 Internal consultation took place in the form of presentations to the Equalities Technical Group and to Senior Officers of the Planning, Highways & Transport and Economy departments.

5. Summary of the Main Issues Raised

5.1 The details of responses received within the consultation period are set out at Annex 1 below. The issues raised are set out in Annex 2 below, together with the associated Officer response. The tables at Annex 1 and Annex 2 were presented to Cabinet and considered as part of the decision to adopt a revised draft of the TCMS document.

ANNEX 1: CONSULTATION REVIEW

1 Public Questionnaire

The online Questionnaire went live on 22nd July and closed on 15th September 2019. 25 questionnaires have been completed. The comments can be summarised as follows:

Agree	Disagree	No Opinion
Do you agree with the five overarching objectives?		
15	5	5
i. Many of the five objectives outlined are almost "wooly" in their description. "Safe and convenient routes [...] all modes" surely this is a given with any strategy and/or infrastructure project. What might read better is how this safety and convenience is going to be achieved. For example "Better understanding and definition of travel routes for certain modes. creating a network where one mode does not disrupt the operations of another" "Improve quality of experience in the Town Centre" ... literally means nothing and is subjective. Objectives need to be measurable, how could one measure the "quality of experience" ...expect through subjective opinion. ii. It assumes the town centre is the final destination of the traveller. It's focus is too concentric iii. You need to acknowledge the experience of those who already live in the Town Centre and improve it such as in the Railway Village and Broadgreen. You need to acknowledge the ease and alternative experience elsewhere and seek to match or improve upon this experience such as travel to the Orbital centre or Cirencester. iv. You need to think bigger, demolish the town centre and start again v. Not enough emphasis on making the end result an attractive place to live, work and enjoy life		
Do you agree with the six Priority Themes?		
16	3	6
i. I believe parking should not be a priority, with cars discouraged from going into the town center area. The other objectives I agree with. ii. You have reduced the effectiveness of the Towns Infrastructure by handing over the dual carriageways to buses, slowing traffic down, land grabbing Whale Bridge, closing off Fleming way with the result of pressure on smaller housing streets such as Crombey Street, Cambria Bridge, Aylesbury Street. You only have part answers whilst giving priority to private businesses in the form of Bus Companies. This is not a balanced approach whilst you have under utilised roads such as Faringdon Road. iii. No comment logged.		

Three interventions designed to support easier movement by cars within the town centre. Do you agree that these indicative schemes offer benefits by simplifying movement?		
12	7	6
i. Intervention B - Whalebridge is good as is, although if Bus Boulevard happens then changes will be needed. Intervention C - Rings roads are not a good idea, it will segregate everything within from the other side, limiting growth and cutting off satellite businesses from the major footfalls. ii. It will be impossible for car drivers to gain access to the town centre. Which makes me think that SBCS plan is to totally exclude cars, and force people to use buses or taxis. Just make it as awkward as possible. iii. Intervention C will need strong enforcement of parking rules, as the roads are narrow in places, and illegally parked vehicles (and lorries loading/unloading) could cause major disruption. Junctions with the ring may also have added delays from traffic trying to enter the anti-clockwise lane of the ring. iv. Pedestrians will suffer on cycle routes as the cyclists do not consider pedestrians. v. The themes assume the solution is two way traffic on a central ring. This will create many more intersections and potential for traffic jam. vi. The obsession with Fleming Way is going to impact Manchester Road, increase pollution next to properties, leads to further rat run traffic. vii. Keep Fleming Way operational with a new design which takes advantage of the whole of the land space. The Buses can have one side of the dualled roads and other traffic can have the other side. The argument for improved connectivity between the Parade and has been lost as the Kimmerfield has not delivered the promises. The Zurich building whilst welcome has tethered the council to Zurichs demands to remain in Swindon. viii. Not enough benefit. Schemes to take through-traffic out of the town are needed,		
Two interventions designed to improve access to bus services and limit the impact of buses on sensitive streets. Do you agree that these indicative schemes offer benefits to public transport users and town centre residents?		
16	5	4
i. I don't believe Heritage Sites should be isolated from growth, development and traffic. Why hold onto the past when we can make room for the future. ii. Please see previous comments. iii. I agree with the proposals except for the Old Town part of Intervention E. I don't see how the Old Town Conservation Area can be addressed without significant detriment to bus users, given that Victoria Road bus stops (not just at Prospect Place) are well used. iv. There is no information given about redesign of the routes. The assumption is that all journeys must use the town centre. It is a profoundly unnecessary location for many travellers, who are travelling, let's say, between north Swindon and Old town. v. only part that 'benefits' public transport users is the new bus boulevard. No other information is given on how this will benefit anyone. The maps are terrible quality and unable to read. hopefully the full document will have readable maps.		
Three Interventions to make walking and cycling to and within the Town Centre more attractive. Do you agree that these interventions should form part of the strategy?		
16	5	4
i. All very well if we lived in a climate that lends itself to cycling and walking, which we don't. Not everybody is fit enough to comply. ii. I agree with the interventions in general, but not with mixing cyclists with a busy bus interchange at Fleming Way (Intervention F). This appears a dangerous proposal. iii. Only if separate provisions are made to protect pedestrians from cyclists as cyclists do not always consider pedestrians on combined cycle paths /pedestrian paths iv. People still need their cars. v. The plan is incomplete for cycling. You have missed out a whole section from the North through Whitehouse Bridges to the South. You are forcing many into difficult decisions such as riding on paths.		

Three interventions designed to accommodate key traffic movements around the town centre). Do you agree that these measures will be effective and should form part of the strategy?		
11	7	7

i. Please see previous comments.
ii. Congestion managment has been proven to be ineffective, just increasing overall car numbers
iii. A two way ring! With pedestrian crossings. Try approaching magic roundabout from drakes way at 8.45am in term time to understand what that will be like.
iv. You need to consider reopening bus lanes to normal traffic such as Ferndale Road, Princess Street and instead switch to bus priority signalling and design. You also need to consider the damage by heavy traffic such as buses, some roads such as Church Place are being damaged by the council choices. There is space for a new road through Kimmerfield and Bridge Street will need to be broadened to accommodate future demand. Fleet Street could be reopened for some movements. The impact of the crossing between the Central Library and Morrisons is impacting traffic movements at the bottom of Victoria Hill.
v. I do agree but nothing that states south of the railway line will help with the traffic flow. might need to consider this.
vi. i doubt their effectiveness to resolve the traffic problems. Far more than cheap fixes are is needed.
vii. Capacity improvements will be aimed at prioritising vehicle movements on the primary highway network, when Great Western Way, County Road and the Magic Roundabout already cause severance for pedestrians and cyclists accessing the town centre. This severance which should be reduced, not worsened through capacity improvements aimed at vehicles. Currently crossing these roads as a pedestrian takes a long time as the traffic lights hold pedestrians for too long, and staggered road crossings make it even worse. I accept that the primary highway networks needs to be signalised for pedestrian safety, but staggered crossings and long delays after pushing the button to cross should be reduced through the interventions, to make it easier for pedestrians and cyclists to cross the primary road network and reduce severance.

Two interventions designed to make town centre car parks easier to use and easier to access. Do you agree that these indicative schemes offer benefits to car park users?		
13	6	6

i. How can I comment when the Report you refer to isn't available on your website. If it is, perhaps you should indicate where to find it.
ii. Alternatives to car transport should be used and encourage more emphatically to prevent congestion. Provision for more/better car parking just acts to increase congestion
iii. These are not benefits just ways to maximise revenue. Check out Canterbury councils latest technology for parking to see what is possible. Lower parking charges for up to 2 hr stays. Separate commuter parking from leisure parking
iv. Your parking maps are incomplete. I am not sure if this is deliberate. You have also missed out the potential of on street parking on Commercial Road and elsewhere. What has happened to one of the most popular car parks off Commercial Road? I am unhappy with the direction of the questions as they are prescriptive about intention rather than improvements.
v. if you consolidate parking into 'key areas' people will just park in the road, on yellow lines, as none of this is enforced within the town centre and connecting roads. the roads are full of random parked cars because people do not want to walk. Try and encourage people is one thing, but you also need to enforce the people who don't abide. good idea but the realistic need to be looked at
vi. It is not evident that sufficient and convenient parking will be provided

2 E-Mail to Dedicated Postbox

14 emails were sent to the dedicated TCMS mailbox in the period up to 23rd September 2019. These include the representations of 1) Historic England, 2) the Heritage Action Zone Project Officer, 3) Swindon Bus, 4) Stagecoach, 5) Swindon Cycle Campaign, 6) Swindon Civic Voice, 7) SBC Urban Design Team and 8) Councillor Bob Wright, which are reported separately below. The comments raised within the other six emails are summarised as follows:

- By email dated 15th September, a respondent suggests that trams are the only sustainable mode of transport in the town centre and a progression towards trams should be central to the strategy. The document fails to reference the reinstatement of the Canal and the benefits this can bring in terms of a walking route. The walking and cycling strategy fails to reference '*the existing unused subway that runs from Station Road to the edge of the North Star environs*';

- Broad Street Area CC: by email dated 14th September - The Group comprises 15 members, who would have made representations had the consultation not been so '*confusing, long and vague*'. No further explanation was offered;

- An unnamed pensioner, a member of the Broad Street Area CC, commented as follows: Bring back the roundabout at Whalebridge. People who visit the Health Centre and park outside will find it difficult to get out of the street. When a system is working why change it;

- By email dated 10th September, a respondent raises general concerns that the document is without tangible content and fails to establish what is wrong before deciding what a holistic solution is. The respondent comments on the inadequacy of signage for cyclists and that a solution needs to be set out in greater detail. The document is difficult to read and the consultation process does not accord with government guidance on consultation. On specific elements of the draft document, the respondent comments as follows:

    - Questions relating to objectives and priority themes are too vague to be able to answer meaningfully;
    - Intervention A is not supported, Intervention B is supported and on Intervention C, it is supported but only on condition that it does not cause traffic gridlock;
    - On the bus interventions, these are not clear or specific enough to be able to comment on;
    - On walking and cycling, support the principle of improving the connection to the Western Flyer. Favour segregation of pedestrians and cyclists and generally better signing;
    - Greater efforts should be made to integrate pedestrian crossing green times, to avoid wasted green time to traffic;

- Wilts & Berks Canal Trust: Rod Hacker, Chair of the Swindon Branch, by email dated 15th September: I am very surprised to note that in the references to the various street improvements, particularly around the Farringdon Road and Railway Village areas, there is no reference to the protected line of the Wilts & Berks Canal through the town which is planned to pass along or across some of the roads. This must surely be considered in any such analysis both for the impact on road schemes and for the attractiveness and general improvement the scheme will make to the local environment. I do note that the removal of this protected line has been proposed unexpectedly in the ongoing consultation on the Local Plan Review Emerging Strategies. I wonder if the omission in the TCMS is intended to pre-empt the results of the other consultation?

- The Motorcycle Action Group: a memo attached to an email of 15th September makes the following comments. Supported by references, I summarise the key points:
  - The strategy to support non-car modes is supported but no consideration appears to have been given to motorcycles;
  - The role of two-wheelers is relieving congestion and air quality is recognised internationally and TCMS should give greater weight to the advantages of this mode of transport;

3 Ward and Parish Councillors

Presentations were given to Members in the Council Chamber on 6th and 7th August and on 3rd September. The following comments were noted:

Councillor Ford: Strongly support improvement to the cycle route network in the town centre. The plans within the document are too unclear.

The extent of modelling was debated generally, with Members wanting to understand the limits of the SATURN model and how it had informed the strategy. The timing of the VISSIM model was questioned too and the ability of it to inform TCMS.

The Taxi Forum asked for further details of the Station Regeneration Project. Officers advised that this was a strategic aspiration but that no details are yet available. The Forum representatives further questioned whether an increase in licensed taxis was reflected in the strategy.

A representative of Swindon Cycle Campaign asked whether TCMS adequately responds to the imminent refresh of the LTP and the wider climate change agenda.

More recently, Councillor Donachie has asked to review the access and signage for the Bristol St car park and the network of roads around restricting traffic movements to the Workshed in London Street.

Councillor Wright, by email dated 17th September, submitted comments, which can be summarised as follows:

- Traffic flow should be directed to the most appropriate routes – larger highways with no residential frontage. Any proposals to increase traffic flow in Manchester Road West is a concern on air quality grounds;
- Goods vehicles servicing retail units in and around Manchester Road are causing problems for traffic and for pedestrians and cycles. Better planning for servicing should be considered and enhanced enforcement;
- A road connection between Whalebridge and Aylesbury Street should be included within the Kimmerfields proposals;
- All residential streets should be subject to a 20mph speed limit;
- Support for the proposals to remove buses from the Railway Village and a more comprehensive assessment of HAZ access needs;
- Current operations at bus stops and bus gates prejudice the free flow of traffic. Support the principles of selective detection at signals;
- Consider a Town Centre P&R site to reduce traffic moving to and from the Outlet Centre. Potential link to out of centre P&R sites;
- Residential development above car parks would support a more efficient use of land;
- The function of Station Road need to be considered carefully, given development proposals and the need to retain access to the HAZ;
- The effects of North Star need to be specifically addressed;
- Measures to support cycling from Whitehouse Road into the centre should be considered;
- Supports the principle of HOV use of bus lanes;
- Support for an additional crossing of the railway;

- Support for extra traffic lanes on GWW, Faringdon Road and Station Road;
- Support for reconfiguration of the streets surrounding Mechanics and Health Hydro;
- Wider footway on the north side of Station Road to enhance the setting of the Carriage Works and the HAZ generally;
- Open Fleet Street to bus movement;
- Objects to the closure of Islington Street at the Bus Boulevard. Concerns too for the effects of BB on the accessibility of Fleet and John Streets. General concerns about the effects of closing Fleming Way;

By email dated 26th September, South Swindon Parish Council submitted comments that can be summarised below:

- The ban on cycling in the pedestrianised centre is not referred to or reconsidered;
- The correlation between problems and solutions is poor
- No reference is made to planned bus lanes or selective bus detection;
- No solution is offered to the listed problem or limited rail crossings;
- The Parish Council is not supportive of Intervention C (Two-Way Ring Road), as it would (a) increase congestion locally, (b) increase traffic flow in some residential streets (incl. Manchester Road) and (c) removes the potentially benefits of bus lanes;
- The removal of bus services from the HAZ will reduce accessibility. If this is progressed, alternative routes will need to be equally beneficial to the community they serve.
- No reference is made to the need for cycle route improvements to the south east, on Commercial Road, Princes Street or into Old Town;
- The potential to connect NCR45 into the Town Centre should be considered;
- Better cycle provision is needed between Regent Circus and Newport Street, potentially onward to Pipers Roundabout;
- Segregation on cycles – from vehicles and from pedestrians – is recommended on major roads;
- Better cycle route signing is needed;

4 Equalities Technical Group (ETG)

Officers met with the ETG on 6th August 2018 and presented the draft TCMS document. A number of comments were made on matters of presentation details but no other comments material to the content of the draft document.

5 Swindon Cycle Campaign

A presentation was given to SCC on 9th September. In response, SCC made a formal consultation response by memo dated 9th September. The comments made can be summarised as follows:

We support the objectives of: "… creating safe, convenient and user-friendly routes into, out of, within and through central Swindon". And within this to:

- "… prioritise options for pedestrians and cyclists", and to
- "… provide routes into, out of and through central Swindon by all modes"

Please note that in the Swindon Cycling Framework adopted by SBC in April 2016, there is an action item to *Review town centre cycling particularly the one-way system and access to rail / bus stations and generally improve permeability. Investigate use of pedestrianised areas.*

In the further development of the strategy, we suggest the following.

The cycling-related aims (embodied largely in the Priority Theme of Connected cycle network and walkable streets, see page 24) should be to:

- Create a single, legible, two-way ring of high quality segregated cycling provision around the town centre;
- Promote more walking and cycling to, and around the town centre for short and medium journeys, ensuring these modes are prioritised in the design and signposting of future streets.
- Reunite the town centre with North Star and Outlet Village through new footbridges and enhancement to existing tunnels, and also provide new links through development to create a finer grain of pedestrian movement.

These were developed in the report *Swindon Town Centre - a vision for cycling* commissioned by the Council and written by Sustrans in 2017. It also includes detailed suggestions for schemes which would meet these objectives.

Interventions F and G do not between them deliver the objectives suggested above. Intervention F *does* connect up the ends of the flyers (and, if developed, should allow fully bi-directional travel). It does not however fully connect with the sketch of Intervention G, so gaps will remain, which will inhibit cyclists on many journeys. We suggest that Interventions F and G should be combined and re-designed with the objectives listed above. Ideas on how this may be accomplished are contained in the 2017 Sustrans report, and in a study commissioned by the Council from Atkins in 2017 (copy attached).

Intervention G suggests provision from Old Town to/from the main town centre. This, we believe, would develop into a well-used link and should connect with other town centre provision.

Intervention G is titled “Improve quality of secondary network”, with a description that says it will provide “Cycle priority measures to provide a fully connected secondary route cycle network …”. As currently depicted it is not fully connected. It is not a “secondary” network, but an integral part of the overall network.

Intervention C, Town Centre ring for vehicles: It may be possible to provide a bi-directional ring for cyclists by the side of the vehicle ring. It may also be possible to provide this away from the vehicle ring, and this option is to be preferred if feasible. Cycling schemes may be easier and quicker to deliver. We suggest that cycling schemes should be prioritised, partly as a way of reducing traffic levels in the town centre.

One of the key features of the town centre area defined in the draft movement strategy is the severance caused by the railway line. Intervention H makes one suggestion for reducing this for pedestrians: a bridge near the railway station. This should also cater for cycling. Further suggestions for reducing severance are contained in the Sustrans report of 2017.

Cycle parking (covered, secure) should be provided at frequent points, and especially at key entry points to the town centre. Provision should be made for cycles adapted for people with disabilities, and for cycles with trailers.

Provision should allow both-way journeys on segregated provision. A suitable standard of provision should be defined. The plans for the Bus Boulevard have explicitly endorsed London Cycle Design standards. Other local authorities have adopted similar standards: for example, the Waltham Forest mini-Holland Design Guide. Swindon should adopt similar standards. Explicit account should be taken of the needs of people using cycles adapted for people with disabilities, and for cycles with trailers.

An order currently bans cycling in parts of the pedestrianised town centre. This should be reviewed, and marked provision made to allow cyclists into and through the pedestrianised area.

The SCC previously provided Officers with a copy of a dissertation written by one of its Members. Titled *'How Accessible is the Swindon Cycle Network to Disabled Cyclists?'*, the document makes a number of recommendations but generally highlights the barriers to cycling by people with a disability. Making provisions for the movement and parking of adapted vehicles should be recognised within TCMS.

6 Bus Companies

GP mailed both bus companies, offering a meeting to present TCMS. Swindon Bus accepted the invitation and GP met Paul Walker on 27th August. The representations made by both bus companies are summarised below.

6.1 Swindon Bus

The bus company has submitted its comments in the form of a word document, dated September 2019. The comments contained therein can be summarised as follows:

- The document has little in terms of vision. It is unimaginative and is an opportunity missed to support mode shift and sustainable growth;
- Little regard paid to the role of buses, which have a central role to play in reducing congestion, improving air quality and accessibility for all;
- The proposals could create very serious operating and commercial difficulties for bus operators;
- The Local Transport Plan sets out aspirations for the development of the public transport network as a sustainable response to growing movement needs. TCMS as drafted shows no effort to prioritise buses as part of an emerging strategy for movement. TCMS should actively support, rather than marginalise, buses;
- The identified negative effects of buses (particularly within HAZ) are value judgements and without evidence;
- Opportunities should be taken to implement UTMC within the central area, specifically SBC and RTPI;
- Intervention C: Needs to reduce long circulatory routes for buses;
- Intervention D: No evidence of consultation here or any other real basis for the ambition. No evidence that this integrates with a future 'transport hub' strategy;
- Intervention E: Contrary to the LTP and significantly worsens bus accessibility. No evidence of the problem or potential for resolution;
- Intervention H: Supported in principle but needs more thought;
- Intervention I: Supported in principle but emphasise importance of UTMC;
- Intervention K: Supported in principle;
- Interventions L & M: Concerns that supporting car parking is contrary to wider objectives of mode shift away from cars. Appears to emphasise a car-based strategy;
- Table 4 is very subjective, of no value and should be removed;

6.2 Stagecoach

The bus company has submitted its comments, in the form of a word document, attached to an email dated 17th September 2019. The extensive comments can be summarised as follows:

- The bus company supports the broad objectives that the strategy is trying to secure and sees public transport as an essential element of the sustainable growth of the Town Centre;
- TCMS as drafted fails entirely to connect with LTP and with the Core Strategy and the principle of more sustainable transport patterns;
- Buses appear to be seen as a contributor to, rather than a solution for, poor air quality. This is wrong and only a significant move to public transport can facilitate air quality improvement;
- The principle of rationalisation of the town centre road network is supported and could enhance bus accessibility but the practicality of implementation is questioned. The thinking is quite strongly supported in principle;
- The rationalisation of movement at Whalebridge is strongly supported (on the presumption that this benefits buses);
- The option to implement two-way bus-only operation in Station Road would be facilitated, dramatically enhancing the accessibility of the train station. This would also enhance the TGV/NEV BRT schemes ;
- In general, TCMS is weakly evidenced;
- Concerns about making Holbrook Way two-way (exg bus lane) but agree that the matter needs to be revisited;
- Eliminating buses from the Railway Village will increase congestion generally;
- There is little ambition or clarity as to how better bus-rail interchange could be facilitated;
- Removing buses from the Railway Village, without alternative equal provision on Farringdon Road, can only reduce bus service attractiveness and damage wider objectives of delivering mode shift. This intervention is especially inappropriate and unacceptable;
- The integration of UTMC – specifically selective bus detection and RTPI – should strongly be considered with the overall objective of achieving mode shift;
- Measures to facilitate car parking align poorly with national and local policy and could undermine stated targets of reducing traffic in the town centre by 15%. As it stands, supporting parking is unlikely to impact TC footfall given more favourable parking offers out of town (eg Morrisons);

7 Taxi Forum

Two members of the Forum attended the Member presentation on 3rd September and expressed dissatisfaction at the level of consultation with them. No further submissions were made, although Officers did speak with one of the Forum members and that conversation has been reflected in the redraft of the document.

8 Swindon Civic Voice

Members of SCV attended the Member presentation on 3rd September 2019 and made representations by email on 20th September. The comments can be summarised as follows:

- Would appreciate seeing reference to our own work over past 5 years re town centre circulation issues, in particular our report submitted to SBC 2 years ago;
- Believe that the TC circulation involves more area to the south than the map covers; our study identified the basis for the problems with Kingshill and through traffic across Old Town as being based in the lack of a proper alternative route to the south;

- Believe that the understanding of character and physical relationships among different areas of town is still insufficient to underpin circulation strategy as well as other social and economic issues; in particular this incomplete understanding is entangled with the various views of the character and function of the old town area. We have thinking to contribute based upon historic understanding of early, and pre- and post-war Swindon. We are not detailing information here, but will prepare a map for a meeting with officers in the first instance.
- We are firmly of the view that 2-way traffic from Park Lane along Faringdon Road must be achieved in order to completely free the GWR Village from through bus and commercial vehicles; we believe it is possible to relieve the Village of all through traffic, thus enabling this historic and valuable visitor amenity to be revealed and enjoyed by residents too.
- We welcome the move to an inner 2-way route; to our knowledge this has long been sought by older Swindonians and promoted by SCV; it would particularly benefit visitors. However, we would like to see more extensive re-design of circulation around Whalebridge roundabout, which has been a serious case of poor design inconveniencing many local drivers.
- We also believe along with many local people (many do not yet realise the character of the plan) for the 'Bus Boulevard (sic)'. We consider there is a case for this to be re-designed not as an obstacle to cross-town flow. We believe that both of these issues (bus boulevard and Whalebridge) are leftovers from the original Muse concept, introduced in response to their insistence, wrongly, and surviving without full understanding into the current strategy.
- They seem to focus on Kingshill and Railway Village as pollution hot spots. There must be more. What effect will electric vehicles have on this?
- If electric vehicles are to be introduced what effect will this have on road crossing as they are pretty near silent. Do we therefore need more official crossings?
- If we are increasing bike routes are they increasing secure storage areas?
- Will the bus route to hospital be prioritised so old/infirm do not have to endure bus change with significant walk or steps as at present?
- Improved route from Town Centre and Outlet/Steam. You have to walk the length of the structures to gain access – creating a "town side" entrance. What about a transport system?
- Parking affordability needs to be looked at ....rumour has it that residents are now subletting drives and garages because of cost for local workers.
- Has effect on feeder roads to GW Way been modelled eg Ferndale, Cheney Manor, Rodbourne, Gorse Hill.
- What about effect of school traffic – increase in peak times affects traffic flow.
- Removal of traffic crossover points ie Catherine Street?
- Increased use of "OAP" scooters....access to shops; stop off points; charging areas.

9 Heritage Action Zone Project Officer

By email dated 19th September, Karen Phiminster confirms support for the principles of TCMS, in particular those interventions that support HAZ Project 6, these being the removal of buses from the Railway Village and the improvement of the pedestrian experience in and around the Town Centre.

A number of amendments to wording are proposed, to give greater emphasis to HAZ. The proposed amendments appear at first glance to be positive additions to the text.

10 Historic England

By letter dated 23rd September, HE has made representations, which can be summarised as follows:

- The Strategy is supported in principle, as a framework for the delivery of HAZ objectives;
- Improving movement within and through the HAZ on foot is an aspiration of the HAZ but also contributing to the accessibility of the wider town centre. There is therefore an important synergy between the two;
- TCMS is welcomed, as it will support the delivery of Projects 6, 7, 8, 9 and 13 of the HAZ Action Plan (16 projects in total);
- The Strategic Overview (p24) is supported but needs to be resilient and flexible in meeting a wide range of regeneration objectives;
- The interventions (Section 5.1, p30) should be only a snapshot of potential schemes that secure better traffic management;
- Strategy benefits associated with health, social and economy should be considered to give a wider appreciation of benefits arising from investment;
- The use of materials in any physical intervention is critical for optimising the identity of the historic area;
- A signage regime for HAZ should reflect the branding of the area;

Reference is made to HE's '*Streets for All*' guidance, which should be referenced in any design proposals.

11 SBC Urban Design

By e-mail dated 13th September 2019, the Urban Design team has commented as follows:

- The document should have a stronger public realm/place-making focus. This is seen as a pressing 'quality' issue;
- The title and cover page of the document should be changed to incorporate reference to 'Place';
- A heavier emphasis should be given to the qualitative aspects of walkability;
- The Strategy should include an Urban Design analysis of the central pedestrian core area;
- Recommend a quality of life survey to establish the scope for improvement to the Town Centre routes and spaces;
- Walking routes are in places fragmented and this should be recognised as a problem;
- Urban Realm issues that the TCMS could seek to address include:
    - Poor pedestrian connectivity beyond the primary retail core
    - Lack of civic-type spaces
    - Lack of landscaping
    - Lack of public seating opportunities
    - Lack of a connected cycle route across the centre
    - Busy gyratory road system and associated severance
    - A generally road-dominated environment

ANNEX 2: RESPONSE TO COMMENTS

Chapter	Source of Comment	Issue Raised	Officer Response
Overarching Objectives (5 no)	SBC Urban Design	There is a pressing quality issue that needs to be addressed through a place-making objective	Propose a more concise and balanced objective list that closely aligns with (a) policy setting and (b) derived issues/opportunities. Reference link to wider objectives, including economy and public health.
	Historic England	The strategy needs to be resilient and flexible in response to a wide range of regeneration objectives	
		Benefits to health, social equity and economy should be recognised	
	HAZ Project Officer	Supports the Town Centre pedestrian experience as a key objective	
	Stagecoach Buses	Support broad objectives but sees public transport as an essential element of a sustainable growth strategy	
	Public Comment	The stated objectives are woolly and should be more refined/detailed	
		The strategy should consider more the TC as a place to live in, rather than as a place to travel to and from	
		Not enough emphasis on the quality of the urban realm and the general attractiveness of the TC	
		Need to aim to make the TC competitive with out-of-centre centres or even other centres, eg Cirencester	
Priority Themes (6 no)	Historic England	The 13 interventions should be a snapshot of potential schemes	Agreed. The scope to refine schemes through the evaluation and design process will be emphasised.
	Swindon Cycle Campaign	Refinement of the wording is suggested and proposed	Noted and incorporated into amended text.
	Public Comment	Improved car parking should not be a priority, it supports driving at the expense of more sustainable modes	Noted but no change proposed. Good car parking remains critical for town centre viability.
		Faringdon Road is underutilised but Crombey Street, Cambria Bridge Road and Aylesbury Street are under pressure. No proper balance.	Noted. The need to balance the use of the street network is central to the highway strategy and this specific issue will be considered. No change to text proposed.
	Taxi Forum	No evidence that the needs of taxis have been considered	Noted and agreed. Greater emphasis needs to be given to the role of taxis.
Highway Based Interventions (A, B and C)	Cllr Donachie	Accessibility of Bristol Street car park and the Workshed needs to be considered	Noted and will be considered. No change proposed.
	Cllr Wright	The hierarchy of traffic routes needs to be more carefully considered, reflecting environmental capacity	Agreed, the hierarchy will be more clearly defined in updated text.
		Manchester Road should not take more traffic on air quality grounds. Servicing operations should be reviewed here and better enforcement too	Noted and agreed. No change proposed.

		Kimmerfields should include a through-road	A through-road has been specifically avoided in the past but is not ruled out. No text change proposed.
		Bus stops and bus gates are detrimental to the free flow of traffic but selective detection at signals is supported	Noted, no change proposed.
		The function of Station Road needs to be carefully considered in the context of HAZ and Station Redevelopment. Northern footway should be widened.	Noted, no change proposed. The scope to widen the northern footway will be evaluated as a scheme emerges.
		The Strategy should consider additional traffic lanes on GWW, Faringdon Road and Station Road	Noted. This option is not discounted. No change proposed.
		Supports reconfiguration of streets around the Mechanics Institute and Health Hydro	Noted. No change necessary.
		Concerned for the effect of Islington Street closure and the closure of Fleming Way generally	Noted. The impacts of any network changes will be carefully assessed. No change proposed to text.
	South Swindon Parish	The consequence of limited rail crossings is not mentioned	Noted and agreed.
		The Ring Street is not supported due to associated impacts	Noted. The Ring Street concept needs to be revised.
	Swindon Bus	C Needs to avoid long circulatory routes for buses	Noted and agreed.
	Stagecoach Buses	Support rationalisation of Whalebridge, provided this addresses buses needs	Noted. Revised text will better outline the public transport strategy.
		Rationalisation of road network is supported, provided that opportunities to improve bus accessibility are taken	
		Loss of Holbrook Way bus lane a concern but agree that rethinking is necessary	
		Support two-way bus operation in Station Road, increasing station accessibility and supporting BRT strategy	
	Swindon Civic Voice	Support the principle of the street rationalisation but with a wider remit. See work that they have previously done.	Comments noted. The work previously undertaken by Civic Voice will be reviewed in the context of the highway schemes.
		Propose two-way traffic flow on Faringdon Road as a precursor for traffic ban within Railway Village	
		Strongly support a review of Whalebridge	
	Canal Trust	The protected line of the Canal should be identified and referenced	Noted. Where appropriate, reference to the historic canal route will be made but no wider reference to a protected alignment.
	Public Comment	Changes to Whalebridge agreed to be necessary in association with Bus Boulevard	Noted. No change necessary or proposed.
		Inner Ring not supported, as this appear to sever the central area	Noted and agreed. The highway strategy will be better presented, without reference to an Inner Ring

		Traffic should be encouraged out of the town centre, not accommodated	All comments noted and significant change is necessary to the document to reflect a number of the concerns highlighted.
		The Ring proposals will increase junction complexity and lead to greater localised congestion	
		Fleming Way downgrading will impact Manchester Road, increasing traffic and worsening air quality	
		Retain vehicle traffic on Fleming Way	
		Buses are causing damage to the highway in Church Place	
		Regent Circus causes queuing in Victoria Hill	
		Concern that a two-way ring will be unsafe for pedestrians	
		Remove bus lanes but focus bus priority at signals	
		Reopen Fleet Street for some movements	
		Doubt effectiveness of individual proposals – more radical solutions necessary	Noted but no change proposed. The success of the strategy will lie in the combined benefit of a number of schemes.
Bus Based Interventions (D and E)	Cllr Wright	Supports the removal of buses from the HAZ	The document needs to be substantially amended to define a clearer strategy for accommodating the needs of public transport alongside active travel modes. Interventions more specific to HAZ should be included, to allow the scope for amendments to bus services to be considered.
		Supports the principle of HOV (high occupancy vehicles) use of bus lanes	
		Fleet Street should be opened to bus movement	
	South Swindon Parish	No reference made to planned bus lanes or Selective Detection	
		Removal of buses from HAZ is not supported due to accessibility reduction	
	Swindon Bus	The negative effect of buses is a value judgment and not evidenced	
		No evidence of consultation or any basis for the stated ambitions	
		Opportunities should be taken to introduce SBC and RTPI in the town centre	
		E is contrary to LTP and worsens bus accessibility. No evidence of a problem or scope for resolution	
	Stagecoach Buses	Removal of buses from HAZ can only work if alternative provision is made on Faringdon Road	
		Removing buses from HAZ can only increase overall congestion	
		No ambition to address bus-rail interchange	

		Opportunities should be taken to introduce SBC and RTPI in the town centre	
	Public Comment	Accommodating growth more important than preserving heritage.	These objectives are not mutually exclusive. The Strategy aims to achieve both.
		Support Intervention E but integration with Old Town Conservation Area needs thought	Noted and text amendments will make reference to these initiatives
		Proposals seem not to cater for cross-town bus movement	
		Beyond Bus Boulevard there appears to be no benefit to buses	
Walking and Cycling Interventions (F, G and H)	Cllr Ford	Strongly supports improvements to TC cycle route network	Noted. No change proposed.
	Cllr Wright	The cycle route through Whitehouse Bridge into the centre needs to be considered	Noted and agreed. These issues and opportunities will be reflected in a revised document.
		Supports an additional crossing of the railway	
	Historic England	Improving walking to and through HAZ needs to be integrated with a similar ambition for the TC as a whole	
	HAZ Project Officer	Supports improved pedestrian connectivity of the HAZ	
	SBC Urban Design	Heavier emphasis needs to be given to qualitative aspects of walkability	
		Fragmented walking routes should be identified as a specific problem	
	Swindon Civic Voice	Any strategy needs to consider wider character and function of the Town Centre and Old Town	Noted and agreed. Revised document will try to reflect this.
	Swindon Cycle Campaign	Would like to see F and G amalgamated into a single scheme to improve cycling within the TC	Noted and agreed. Significant change to the text should be made to reflect these suggestions.
		Would like to see a cycle ring, preferably segregated from a vehicle ring	
		Cycle schemes should be prioritised as a way of reducing traffic levels in the town centre	
		Look more seriously at the issue of railway severance and potential solutions	
		Cycle parking should be provided at the key town entry points	
		The specific parking and movement needs of disabled cyclists should be recognised	
	Public Comment	Strategy supported in principle but design of the Boulevard will need to carefully consider cyclists	Noted, no changes proposed.

		Shared pedestrian and cycle space not supported, as cyclists too inconsiderate	Noted but no change proposed.
		No reference to resolving movement through Whitehouse Bridge	Clearer reference to the Whitehouse Bridge constraint should be made.
		Better signing of the cycle route network is needed	Agreed. Where possible incorporate reference to more comprehensive cycling strategy in updated draft.
	South Swindon Parish	Better signing of the cycle route network is needed	
		Ban on cycling in the centre should be referenced and reassessed as part of strategy	
		No reference to cycle route improvements on Commercial Road, Princes Street or into Old Town.	
		Improve cycle connection between Regent Circus, Newport Street and Pipers Roundabout	
		Consider potential TC connection to NCN45	
		Would like to see segregation of cycles on major roads	
Strategic Highway Interventions (I, J and K)	Public Comment	Simply managing congestion has been shown not to work.	Agreed. The highway strategy is not clear and needs to reflect the competing needs of a range of users. Text to be amended in this regard.
		Increasing the capacity of the highway network increases severance and should not be pursued. If so, crossings for pedestrians and cycles need to be improved.	
Car Parking Interventions (L and M)	Cllr Wright	Consider a Town Centre P&R site serving the Outlet. Potentially linked to out of centre P&Rs	Noted but linked to wider P&R strategy.
	Swindon Bus	Concern for the emphasis on a car-based and unsustainable movement strategy.	Agreed. The role of sustainable transport modes will be strengthened.
	Stagecoach Buses	Investment in car parking contradicts objectives of reducing car traffic by 15%	There is a need for careful balance between town centre viability and sustainable movement. This balance will be better emphasised in updated document.
	Swindon Civic Voice	The affordability of parking, especially for employees, needs to be reviewed	Agreed. Pricing of car parking will be an aspect of the parking strategy. Text to be amended.
	Public Comment	Alternatives to car transport are needed. Increased attractiveness of parking only adds to congestion.	The rationale behind the parking strategy as an element of a multi-model and sustainable movement strategy should be emphasised in a clearer and more prescriptive text.
		Focus on charging regime to maximise effectiveness of parking stock	
		Proposals not prescriptive enough	
		Support the proposals in principle but on-street enforcement is needed if car park use is to be encouraged	

General Comments	Cllr Wright	North Star needs to be more specifically considered	There remains uncertainty surrounding the North Star proposals and more specific consideration cannot reasonably be given. No change proposed.
	South Swindon Parish	There is poor correlation between problems and solutions	Agreed. These weaknesses will be addressed in a revised draft.
	Swindon Bus	No vision. An opportunity missed to support mode shift and sustainable growth	
		Little regard paid to the role of buses, which are central to congestion reduction, air quality and accessibility for all	
		TCMS ignores LTP aspirations for sustainable movement	
		Table 4 is of little value, subjective and should be removed	
	Stagecoach Buses	TCMS ignores LTP aspirations for sustainable movement	
		Buses appear as a contributor to, rather than a solution for, poor air quality	
		The strategy is poorly evidenced	
	Swindon Cycle Campaign	Does the Strategy adequately reflect a Climate Change agenda?	Link to LTP and Council Vision will be emphasised.
		Revisit schemes set out in SUSTRANS document of 2017	Agreed. Earlier studies will be reviewed as part of any scheme proposals.
	Motorcycle Action Group	Supports non-car access strategy but would like to see reference to motorcycles as sustainable alternative to cars	Agreed. Specific reference to motorcycles will be made.
	Public Comment	Document too confusing, long and vague	Agreed. These weaknesses will be addressed in the revised draft
		Document is without tangible content, fails to establish what is wrong and what the holistic solution should be	
		Bus proposals not specific enough to warrant comment	

G Prodohl 20/02/2020