

# **Council**

**Thursday, 11 July 2019**

**Agenda Item 6 - Swindon Borough Local Plan Review - 2nd  
Regulation 18 Consultation (Preferred & Emerging Options)**

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## Swindon Borough Local Plan Review – 2nd Regulation 18 Consultation (Preferred & Emerging Options)

Cabinet

Date: 10<sup>th</sup> July 2019

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Author: Cabinet Member for Strategic Planning /  
Head of Planning, Regulatory Services and Heritage

Wards: All

Parishes Affected: All

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### 1. Purpose and Reasons

- 1.1 To seek approval to undertake public consultation on the preferred and 'emerging' options for the Swindon Borough Local Plan Review for a period of 8 weeks in accordance with Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).
- 1.2 Community engagement is an essential part of the Plan preparation. A specified period of public consultation enables the wider community to assess the work undertaken to date and help shape the final draft Plan to be submitted for examination in 2020.
- 1.3 The Local Plan Review will have a key role in implementing many of the Corporate Plan's priorities and will be fundamental in delivering key elements of the Priority One: Improve infrastructure and housing to support a growing, low-carbon economy.

### 2. Recommendations

Cabinet is recommended to submit to Council that it:

- 2.1 Authorises the Head of Planning, Regulatory Services, and Heritage to undertake public consultation on the preferred and 'emerging' options of the Swindon Borough Local Plan Review as attached at Appendix 1 and 2 and in accordance with the arrangements set out in paragraph 3.45.to 3.48.
- 2.2 Authorises the Head of Planning, Regulatory Services, and Heritage, in consultation with the Cabinet Member for Strategic Planning and Sustainability, and the Chief Legal Officer, to make minor non-material changes to the content of the documents if required, prior to publication.

### 3. Detail

- 3.1 The Council is required to have an up to date Local Plan to provide a planning framework to shape and guide future development through the determination of planning applications in the Borough.
- 3.2 The Swindon Borough Local Plan 2026 was adopted on March 26<sup>th</sup> 2015 (Council Minute 97, 2014/15 refers). The independent Local Plan Inspector in his

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Further information on the subject of this report can be obtained from Phil Smith, 01793 466443, psmith@swindon.gov.uk.

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report recommended an early review of the Plan to update the housing and employment land requirements.

- 3.3 The revised Local Development Scheme was approved for publication in March 2019 (Cabinet Minute 76, 2019/20 refers). It sets out the timetable for the review of the Local Plan. In accordance with this timetable it is intended to undertake public consultation on the preferred and emerging options of the Local Plan review in the summer of 2019.
- 3.4 Public consultation on the Issues and Options for the Local Plan was undertaken between 6<sup>th</sup> November 2017 and 19<sup>th</sup> December 2017 in accordance with Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), (Cabinet Minute 52, 2017/18 refers). These regulations do not limit the number of consultations to be undertaken before consultation on the final draft to be submitted for examination.
- 3.5 This additional consultation at this stage in the Plan preparation enables the public and other interested parties to comment on the emerging Plan and shape the final document thereby empowering ownership and reducing the scale of objections to the final draft plan and subsequent examination.

## How many homes need to be planned for?

- 3.6 The Local Housing Need for Swindon Borough, calculated in accordance with the government's standard method as specified in the Planning Practice Guidance is 1,040 dwellings per annum.
- 3.7 The Local Housing Needs Assessment 2019 (attached at Appendix 3) suggests that in order to balance the number of homes to the number of jobs the Local Housing Needs could be uplifted to 1,080 homes per annum. This adjustment is based on an assumption that there will be no change to commuting patterns from the 2011 census.
- 3.8 Both figures are comparable to the average 1,071 net additional homes built per annum built over the last twenty years.
- 3.9 In its autumn 2018 consultation, the Ministry for Housing Communities and Local Government indicated that it is the Government's intention to review and propose a revised standard methodology for calculating local housing needs. Accordingly, there remains a risk that the scale of housing that will need to be planned for in the Borough will change. However, guidance requires that we must use the most recent guidance available to us in progressing with the Local Plan.
- 3.10 The Revised National Planning Policy Framework (NPPF 2019) identifies that on adoption the plan should identify a five year supply of deliverable housing sites. The plan should incorporate some flexibility to maximise the likelihood that it will

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be able to demonstrate a five year housing land supply. Additionally, flexibility should be built in to reflect the likelihood that not all existing commitments (sites with planning permission and site allocations) will come forward by 2036. By applying these assumptions there is a need to identify sites to accommodate at least 19,650 dwellings for the period 2018-2036.

## Meeting identified needs

- 3.11 A very large number of new homes are already in the pipeline. Many of these new homes are planned within the large-scale new communities allocated for development in the Swindon Borough Local Plan 2026, including the New Eastern Villages and Kingsdown. In total 17,740 dwellings as at January 2019 are already committed by virtue of extant permission or allocations in the adopted local plan and made neighbourhood plans.
- 3.12 In addition to the planned housing identified in the table above, a windfall allowance of 57 dwellings per annum for new housing on small sites of fewer than 5 houses from 2021/22 onward has potential to deliver another 855 dwellings by 2036<sup>1</sup>. In total, therefore, 18,595 homes are already accounted for through consents, allocations and windfall assumptions, meaning that the residual requirement is about 1,000 homes beyond existing commitments.

## Reasonable alternatives for meeting residual housing requirements

- 3.13 The Strategic Housing and Employment Land Availability Assessment 2019 (SHELAA) report identifies 986 homes as developable on Borough Council owned land within settlement boundaries. Many of these sites are (as noted in the SHELAA report) currently public open space. In view of the uncertainty surrounding whether or not these sites will ever come forward, it is not considered reasonable to include them in an urban capacity figure. Also the number of non-constrained private sites within the settlement boundaries is limited. Therefore a precautionary approach is assumed to the contribution of urban capacity sites of 250 above the windfall allowance. Delivery on urban sites in excess of the 250 unit allowance would be additional supply which would contribute to the Borough being able to maintain a deliverable five year housing land supply. Additionally the consultation will consider those Council owned sites to be taken forward.
- 3.14 Paragraph 68 of the NPPF states that Plans should seek to accommodate at least 10% of the areas housing requirement on sites. About 70% of the planned housing is located in the urban extensions Taking this into account, planning a further strategic scale extension may not satisfy this requirement above in that:

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<sup>1</sup> The basis for this windfall allowance is explained in the Swindon Borough Strategic Housing and Economic Land Availability Assessment 2019.

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lead-in times for a strategic site mean that it would be unable to contribute to the delivery of housing in the early part of the plan period when supply is likely to be lowest. For these reasons it is not considered that planning for a single additional strategic site or more than one strategic site to accommodate all of the residual housing need is a reasonable option. However, an additional strategic site could be planned alongside other options, perhaps extending beyond the 2036 plan horizon.

- 3.15 Paragraph 35 of the NPPF states that to be sound, a plan must be “an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence”.
- 3.16 The Planning Practice Guidance states “reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in its plan. They must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The alternatives must be realistic and deliverable.”
- 3.17 Based on the SHELAA assessment, four strategic options for meeting the residual requirement have been identified and tested through the sustainability appraisal.
- 3.18 *Option 1 - A strategic scale expansion site at St Andrews/Blunsdon*
- 3.19 Strategic scale expansion at St Andrews/Blunsdon potentially combined with the allocation of land for some additional housing at the higher tier rural settlements of Highworth or Wroughton or with a dispersal approach.
- 3.20 *Option 2 – Graduated Dispersal*
- 3.21 Highworth and Wroughton are the largest rural settlements with the widest range of facilities and therefore it is reasonable to consider options in which they are the focus for some additional green field housebuilding.
- 3.22 The residual housing requirement could be delivered by allocating housing at Highworth, Wroughton and at some or all of the other villages in the Borough.
- 3.23 This ‘graduated dispersal’ approach would likely minimize the additional pressure on the problematic A419 Coldharbour junction which is highlighted in the SHELAA as a potential constraint to significant additional housebuilding at Broad Blunsdon or St Andrews.
- 3.24 *Option 3 - Broad Blunsdon focus*
- 3.25 Significant volumes of new housing are planned at Broad Blunsdon and further land is promoted for development, south, east and north of the village. This

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creates the option for a more significant but still non-strategic planned expansion to the village.

## 3.26 *Option 4 - Wroughton focus*

3.27 Wroughton has the high number of sites promoted for non-strategic growth. As with Broad Blunsdon, this means that focussing on Wroughton is a potentially reasonable and deliverable broad housing distribution option.

3.28 The alternatives presented above are not at this stage site specific. There are a number of site options capable of delivering each spatial option, and there is not at this stage certainty regarding the exact sites that would be allocated.

3.29 No single option performs best across all of the sustainability topics and no option is necessarily unsustainable. The best performing option is option 2 (graduated dispersal). This option performs well on the housing topic, transport topic and landscapes. Option 2 also best aligns with delivery of small scale sites in the first five years of the Plan.

3.30 The next best performing options are options 1 (Strategic scale growth at St Andrews/Blunsdon) and 4 (Wroughton focus). The potential for significant negative transport effects, associated with the Coldharbour junction, are identified for option 1 and the potential for significant negative air quality effects are identified for option 4, in terms of potential impact on the Kingshill AQMA and on Devizes Road.

3.31 Option 3 (Broad Blunsdon focus) performed the least well across all SA topics. The option is ranked last for climatic factors, healthy and inclusive communities, and transport, although it ranks best for biodiversity. This option is identified as creating the potential for a significant negative effect on the transport topic related to capacity issues at the Broad Blunsdon/Coldharbour junction.

3.32 The public consultation will focus on these strategy options, particularly seeking an understanding of community aspirations including infrastructure requirements and assessment of those individual sites which should be allocated.

## How much employment land needs to be planned?

3.33 The Swindon Employment Land Review 2017 provides a range of scenarios for 2016-2036 employment land requirements based on information supplied by the leading economic forecasting companies and past completion rates.

3.34 Based on this evidence in respect of office land requirements is considered that it is reasonable to consider an additional need of between 2.4ha and 10.2ha. This equates to a floor space requirement of 16,000sqm to 67,700sqm. As the quantum of land required to deliver office development depends on whether it is built at town centre or out-of-town plot ratios, it is clearer to present the

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requirement in terms of floor space. In respect of industrial land requirements it is considered that it is reasonable to plan for an additional need of 56.7 hectares.

## Meeting future Employment Land Needs

- 3.35 Taking into account extant permissions and allocations, there is notionally sufficient land to meet the top-end of the forecast need indicated above.
- 3.36 The Employment Land Review identifies possible reasons for allocating additional land for development:
- 3.36.1 To provide short-term supply to guard against the potential that important allocations which are identified as being subject to delivery barriers (Wichelstowe and parts of New Eastern Villages) continue to be delayed in coming forward.
- 3.36.2 To meet 'qualitative demand' identified by local commercial land agents consulted as part of preparation of that report, in particular in the industrial market to provide choice to occupiers and allow existing local business to expand.
- 3.36.3 To support new inwards investment, for example through a strategic office/business park product and/or industrial land on the strategic road network to appeal to inwards investment inquiries.
- 3.37 The overall picture therefore is not one of quantitative need for employment space, but of indicators that the Council may wish to plan for additional employment land if, or where, suitable options exist.
- 3.38 The ELR was produced before the announced closure of the Honda Manufacturing Plant. The timetable for the Honda site becoming available and the land uses for which it would be made available, are not yet clear. At present only half the site is developed and could provide additional operational employment land, once potential impacts have been quantified.

## Reasonable alternatives for meeting employment land requirements

- 3.39 In light of the above, it is considered that the reasonable strategy options for employment land are as follows:
- 3.39.1 In view of the fact that sufficient land is already identified to meet needs for employment floorspace in the period to 2036, it would be a reasonable option to allocate no further employment development land, particularly as the Honda site has the potential to accommodate additional employment beyond the current use.

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3.39.2 A number of smaller sites are identified within settlement boundaries and it would be a reasonable option to allocate one or more of these for employment uses to assist in meeting the qualitative demand identified in the ELR and to provide choice to local businesses.

3.39.3 Allocate a strategic scale employment site on greenfield land either within or outside of the Borough, in addition to smaller employment sites within existing settlement boundaries. This would represent a 'policy on' approach of seeking to allocate land to secure inwards investment to the Borough. The Borough Council has historically adopted that approach and the ELR recommends that it is considered going forward. This is therefore considered also to be a reasonable option.

3.40 Overall, Option 1 is the least well performing option in view of its poor performance on the economy, confidence in housing delivery and inclusive communities' objectives. There are pros and cons for options 2 and 3. Option 3 creates the greatest potential for positive economic effects, but also the greatest potential for negative sustainability effects, including potentially significant effects on the transport infrastructure.

## Gypsy and Travelling Show People Need and Sites

3.41 The Gypsy and Travellers Accommodation Needs Assessment identifies a requirement in the Borough of an additional 11 to 23 gypsy/travellers pitches and 14 additional travelling show-people plots for the period 2018-36. Work is on-going to identify suitable sites.

## Development Management Policies

3.42 The Local Plan Review is also an opportunity to refresh those policies used to determine planning applications in light of revisions to the NPPF, best practice and experience in their operation. Such policies include design, open space provision, affordable housing and infrastructure.

3.43 In addition new policies in the Local Plan are proposed to supersede the Swindon Central Area Action Plan (2019), including a more flexible approach to primary and secondary retail frontages recognising the changing nature of the town centre.

3.44 Additional policies are also proposed to limit the cumulative impact of 'unhealthy' uses such as betting shops and hot-food take-ways, and to meet the accommodation needs of an ageing population.

## Next Steps

3.45 If agreed by Cabinet and Council, it is intended the public consultation would be undertaken for a period of eight weeks from 29<sup>th</sup> July 2019 to 23<sup>rd</sup> September

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2019. For ease of reference it is intended to produce two documents, the first detailing the strategic options for meeting the identified needs and potential sites to achieve those options as presented in Appendix 1. The second would be a draft of the refreshed Development Management policies as presented at Appendix 2.

- 3.46 The consultation will be undertaken in accordance with Council's adopted Statement of Community Involvement in Planning and include:
- 3.46.1 Early notification of the consultation period to Parish and Town Councils following Cabinet and Council approval;
  - 3.46.2 Letter or email to consultees on the planning policy consultation database, providing notification of the consultation;
  - 3.46.3 Online publication of all consultation documents on the Council's website.
  - 3.46.4 Publication of advertisement in local newspapers; and
  - 3.46.5 Documents being made available for viewing at the Council's main office and at public libraries.
- 3.47 It is also proposed to hold specific events for representatives of parish and town councils and their communities, particularly those areas highlighted in the options appraisal.
- 3.48 Additional work will be undertaken leading up the submission draft version of the Plan particularly in relation to viability and updating of the Infrastructure Delivery Plan in the knowledge of the preferred options.

## 4. Alternative Options

- 4.1 The Borough Council could choose not to proceed to with the public consultation at this stage and rely on public consultation of the pre-submission draft Plan (Regulation 19). However this risks potential delay to the local plan if there are unresolved objections at that stage. Not proceeding as intended would lead to delay in producing an up-to-date Local Plan with associate risks, including a continuation of our lack of a 5 year housing land supply, the stifling of economic development and potential intervention by the Secretary of State

## 5. Implications, Diversity Impact Assessment and Risk Management

### Financial and Procurement Implications

- 5.1 The costs of preparing the review of the Local Plan will be met from the Forward Planning budget, which is determined annually based on likely spend.

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- 5.2 The Swindon Borough Local Plan is a strategic planning policy document, and as such, it does not necessarily commit the Council itself to funding proposals contained within it. However, the Local Plan is a key document in securing Government funding for infrastructure and subsequent commitments on the Council for the expenditure of such funding.

## Legal and Human Rights Implications

- 5.3 The preparation of the Local Plan Review have to be in accordance with relevant legislation, particularly the Planning and Compulsory Purchase Act 2004 as amended by the Localism Act 2011.
- 5.4 The content of this report will not have a direct implication on human rights issues.

## All Other Implications (including Staff, Sustainability, Health, Rural, Crime and Disorder)

- 5.5 The Local Plan Review will be subject to a Sustainability Appraisal incorporating Strategic Environmental Assessment and Health Impact Assessment to ensure that the impact of proposals can be minimised with the least negative impact possible on the Plan area. Other planned development documents will be in accordance with the Local Plan.

## Diversity Impact Assessment (DIA)

- 5.6 A DIA has been undertaken on the development plan documents and is available from Phil Smith (contact details at footnote). The DIA reveals that overall the Local Plan Review seeks to produce positive impacts for all those who live and work in the Borough by meeting identified housing and employment (land) needs to 2036 and through policies which seek to create an inclusive and accessible built environment, to engender positive health impacts and to provide suitable housing for specific equality groups such as older people, wheelchair users and gypsies and travellers

## Risk Management

- 5.7 Delay to the Local Plan Review could undermine the Council's vision to create and realise Swindon's aspirations for development. Appendix 2 of the Local Development Scheme (March 2019) presents a detailed risk assessment to the Local Plan Review Production. Adequate resourcing and robust proportional evidence are identified as potential risks to the Local Plan Review.

## **6. Consultees**

- 6.1 The Director of Finance (Section 151 Officer) and the Chief Legal Officer are consulted in respect of all reports.

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## **7. Background Papers**

7.1 None

## **8. Appendices**

8.1 Appendix 1: Swindon Borough Local Plan Review Spatial Delivery Options and Site analysis. (The appendix is available online at the Council's website or on request from Committee and Member Services [committeeservices@swindon.gov.uk](mailto:committeeservices@swindon.gov.uk))

8.2 Appendix 2: Swindon Borough Local Plan Review Development Management Policies (The appendix is available online at the Council's website or on request from Committee and Member Services [committeeservices@swindon.gov.uk](mailto:committeeservices@swindon.gov.uk))

8.3 Appendix 3: Swindon Borough Council and Wiltshire Council Housing Needs Assessment 2019. (The appendix is available online at the Council's website or on request from Committee and Member Services [committeeservices@swindon.gov.uk](mailto:committeeservices@swindon.gov.uk))

## **9. Key Decision/Decision in Cabinet Work Programme and Forward Plan**

9.1 This is not a Key Decision and is included in the Cabinet Work Programme and Forward Plan for June 2019.



## **APPENDIX 1**

# **DRAFT Swindon Borough Council Local Plan Proposed Options Summary Report**

**July 2019**

This document may be viewed or downloaded from our website  
[https://www.swindon.gov.uk/info/20113/local\\_plan\\_and\\_planning\\_policy/647/monitoring\\_and\\_evidence\\_base](https://www.swindon.gov.uk/info/20113/local_plan_and_planning_policy/647/monitoring_and_evidence_base)

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## **1. The Process So Far**

- 1.1 In winter 2017 we consulted on options for the Swindon Borough Council Local Plan review and for joint working with Wiltshire Council.
- 1.2 A report on that consultation is one of the supporting documents for the current consultation.
- 1.3 In July 2018, having previously consulted on a proposed standard methodology for calculating local housing needs, the government published a new National Planning Policy Framework (NPPF) and updates to its Planning Practice Guidance (PPG).
- 1.4 The new NPPF (subsequently updated again earlier this year) confirms that the new standard methodology for calculating local housing needs should be used as the basis for new local plans, other than in exceptional circumstances.
- 1.5 During 2018 we undertook a Strategic Housing and Economic Land Availability Assessment which assessed 466 sites. We consulted on the interim results of that assessment in autumn 2018 and published the final report in January 2019 (SHELAA 2019).
- 1.6 Alongside that, we have prepared new draft planning policies and have been working on options for how we meet needs for housing and employment land.

## **2. The Current Stage**

- 2.1 Before we publish our final proposed local plan review, we want your input.
- 2.2 Therefore we are seeking comments on:
  - 2.2.1 Draft new and replacement development management policies
  - 2.2.2 Options for the spatial distribution of additional housing
  - 2.2.3 Options for employment land
  - 2.2.4 Options for meeting Gypsy and Traveller accommodation needs
  - 2.2.5 Our list of site options

- 2.3 We will use this consultation in developing the Council's preferred approach, which will be set out in the submission plan in winter 2019-2020.
- 2.4 The remaining part of this consultation paper set out the emerging proposed options.

### **3. Development Management Policies**

- 3.1 We are publishing draft development management policies. We aim to streamline and reduce the number of policies, while increasing their focus on securing high quality development.
- 3.2 We want our policies to be clear and user-friendly for the development industry.
- 3.3 We are proposing to remove some development management policies from the current Local Plan 2026 where we consider that those policies no longer serve a clear purpose in guiding the determination of planning applications or where we feel the topic is better dealt with in a neighbourhood plan.
- 3.4 We are proposing a number of new policies which address gaps in the Local Plan 2026 or new planning issues that have come to light in the implementation of the plan.
- 3.5 In line with NPPF paragraph 16(f), we do not want to duplicate national policy by repeating passages of the NPPF or PPG. That is not the role of a Local Plan.
- 3.6 For each of the new and amended policies, we have included a brief 'what has changed' box, highlighting the main changes. At the start of the document we have included an 'origins and destinations' table showing which policies of the current Local Plan 2026 the new policies replace.
- 3.7 We invite your comments on the proposed policies. Your comments should clearly identify which policy they relate to and set out your support for the proposed approach or alternatively explain why you think we should take a different approach.

## **4. Planning for New Housing**

- 4.1 Alongside our development management policies, the new plan will identify sites to meet assessed need for housing. In this section we explain the options we are considering.

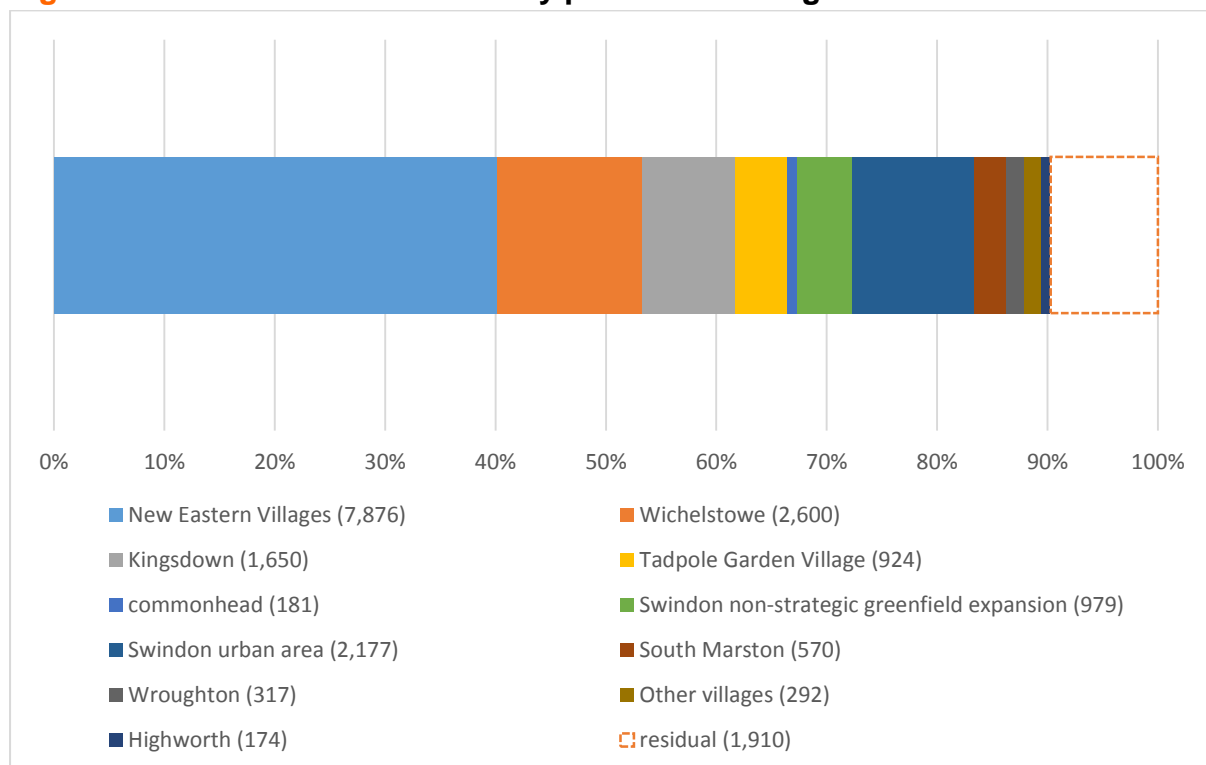
### How Many Homes?

- 4.2 The government's Planning Practice Guidance sets out a standard methodology for calculating Local Housing Need.
- 4.3 The Local Housing Need for Swindon Borough, calculated in accordance with the 2014-based household projections (calculation using the 2014-based household projections for the period 2019 to 2029 and using 2018 median affordability ratio), is 1,040 additional homes each year.
- 4.4 We asked consultants ORS to model the balance between jobs and homes using Local Housing Need and the projections for the employment growth used in the Swindon Borough Employment Land Review 2017 (ELR). The advice of ORS is that to ensure there will be sufficient resident workers to align with the jobs growth identified by the 2017 ELR on the basis of no change in the commuting rates identified by the 2011 Census an average of 1,080 additional homes each year would need to be planned for.
- 4.5 Both figures are comparable to the average 1,071 net additional homes built each year over the last twenty years.
- 4.6 The new National Planning Policy Framework (NPPF 2019) requires that on adoption the plan should identify a five year supply of deliverable housing sites. The plan should incorporate some flexibility to maximise the likelihood that the Council will be able to maintain a five year housing land supply. Additionally, flexibility should be built in to reflect the likelihood that not all existing commitments (sites with planning permission and site allocations) will be built by 2036. By applying these assumptions there is a need to identify sites to accommodate at least 19,650 dwellings for the period 2018-2036.
- 4.7 This means around 1,090 additional homes per year, 5% above Local Housing Needs.
- 4.8 The Council is considering the Swindon and Wiltshire Strategic Housing Market Area Assessment of the housing needs of different groups. The Council is required to maintain a register of people wishing to commission or build their own homes and grant sufficient permissions to meet that need through the development management process.

## Meeting Identified Housing Needs

- 4.9 We have already planned 17,740 of the 19,650 homes through a combination of planning permissions and site allocations under the Swindon Borough Local Plan 2026 and neighbourhood plans. The distribution of the homes that have already be planned is shown in Figure 1 below with. The number of homes planned in each location is shown in brackets.

**Figure 1: The distribution of already planned housing**



- 4.10 As can be seen, homes have been planned to meet close to 90% of anticipated housing needs to 2036. The New Communities allocated under the Swindon Borough Local Plan 2026 account for more than 65% of the homes to be planned.
- 4.11 The SHELAA 2019 shows that on average 57 dwellings each year have been built in the Borough on sites of 4 dwellings or fewer in size. Applying this small site windfall allowance from 2021/22 onwards has potential to deliver another 855 new homes by 2036.
- 4.12 Taking into account this small site windfall allowance, the residual requirement we need to plan for is **around 1,000 homes**.

### How Many of the Houses Can be Accommodated on Sites within Urban Areas?

- 4.13 The **Interim Sustainability Appraisal Report** (Interim SA), which has been prepared to support this consultation, recommends a conservative approach to assessing the number of homes that will be built on larger urban sites.
- 4.14 The Interim SA recommends an allowance of 250 additional homes on such sites is used in developing options to meet the residual housing need.
- 4.15 A conservative approach to assessing the number of homes that will be built in the urban area increases the chances that the Borough Council will be able to demonstrate and maintain a deliverable five year housing land supply, as it is required to do by national policy. It also means that there is contingency built into the plan in the event that some existing urban area planning permissions are not built

### Broad Spatial Options for Accommodating the Residual Housing Requirement

- 4.16 The Interim Sustainability Appraisal identifies five broad spatial options for meeting residual housing needs:

#### **Figure 2: Broad spatial options**

##### **Option H1 - A strategic scale expansion site at St Andrews/Blunsdon**

Strategic scale (greater than 500 houses on a single site) expansion at St Andrews/Blunsdon potentially combined with the allocation of land for some additional housing at the higher tier rural settlements of Highworth or Wroughton or with a dispersal approach. Such development would be expected to deliver towards the end of the Plan period.

##### **Option H2 – Graduated Dispersal**

The residual housing requirement could be delivered by allocating housing at the largest rural settlements of Highworth and Wroughton and at some or all of the other villages in the Borough.



### **Option H3 - Broad Blunsdon focus**

Significant volumes of new housing are planned at Broad Blunsdon and further land is promoted for development, south, east and north of the village. This creates the option for a more significant but still non-strategic planned expansion to the village.

### **Option H4 - Wroughton focus**

Wroughton has the high number of sites promoted for non-strategic growth. As with Broad Blunsdon, this means that focussing on Wroughton is a potentially reasonable and deliverable housing distribution option.

- 4.17 The alternatives are not at this stage site specific. There are a number of sites capable of delivering each option, and there is not at this stage certainty regarding the exact sites that would be allocated.
- 4.18 The options are assessed in the Interim SA. It finds that no single option performs best across all of the sustainability topics and no option is necessarily unsustainable. The best performing option is option H2 (graduated dispersal). This option performs well on the housing topic, transport topic and landscapes. Option H2 also best aligns with delivery of small scale sites in the first five years of the Plan.
- 4.19 The next best performing options are options H1 (Strategic scale growth at St Andrews/Blunsdon) and H4 (Wroughton focus). The potential for significant negative transport effects, associated with the Coldharbour junction, are identified for option H1 and the potential for significant negative air quality effects are identified for option H4, in terms of potential impact on the Kingshill AQMA and on Devizes Road.
- 4.20 Option H3 (Broad Blunsdon focus) performed the least well across all SA topics. The option is ranked last for climatic factors, healthy and inclusive communities, and transport, although it ranks best for biodiversity. This option is identified as creating the potential for a significant negative effect on the transport topic related to capacity issues at the Broad Blunsdon/Coldharbour junction.

### Housing Site Options – Rural

- 4.21 In preparing the Local Plan we need to narrow the long list of sites in the SHELAA 2019 into a smaller number of proposed site allocations in the submission plan.
- 4.22 In doing that, we started from the list of developable sites identified as potentially suitable, available and achievable for housing development in the SHELAA 2019.
- 4.23 The Interim SA focusses on those sites which are outside of existing settlement boundaries. Land within settlement boundaries would in principle be an appropriate location for housing development under national and local policy, so these sites are not subject to sustainability appraisal. Council-owned and other urban area sites are considered in the following section beginning at paragraph 4.26 below.
- 4.24 The sites outside of settlement boundaries listed in Figure 3 below have been assessed at this stage. Those sites, together with urban area sites, are shown in the maps at **Appendix 1**. Site S0479 (Land at Ridgeway School) is a new site not included in the SHELAA 2019. The following site boundaries have been redrawn as landowners have indicated that additional land is available for development: Roundhills Mead, Highworth (S0467); land east of Swindon Road (south), Wroughton (S0072); and North of Mayfield. West of Kite Hill, Wanborough (s0221).

**Figure 3: Assessed housing sites (rural areas)**

Site ref	Site	Indicative no. of residential units
<b>Broad Blunsdon and St Andrews</b>		
s0030	Lower Widhill Farm, Blunsdon	595
s0048	Land north of Blunsdon	4,298 (proposed by agents for circa 1,000)
379/32	Tadpole Garden Village extension (north)	1,360
s033	Land south of B4019, Blunsdon	103
s0036	Land at Turnpike Rd, Blunsdon	119
s0050	Land at Sams Lane, Blunsdon	196
s0375	Land north of Kingsdown Lane	111
s0377	Part of upper Burytown Farm	tbc

Site ref	Site	Indicative no. of residential units
s0403	Blunsdon Land Ltd	33
s0429	Land east of Blunsdon	150-200
s0460	Land at 12 Turnpike Rd, Blunsdon	60
s0055 and s0056 (s0037 4)	Land adjacent to Stepside, Blunsdon St Andrew	54
69	Burcot House, Blunsdon St Andrew	39
<b>Highworth</b>		
s0230	Land to west of Swindon Road and south of Highworth Rec	5
s0293	Lechlade Road, Highworth	25
s0467	Land east of Roundhill Mead	117 up to 300
S0477	Part of land west of Highworth	180
<b>Wroughton</b>		
s0071	Land east of Swindon Rd (north)	219
s0072	Land east of Swindon Rd (south)	250
s0427	Akers Land, Wroughton	350
s0479	Land north of Ridgeway School	100
<b>Chiseldon</b>		
s0028	Part of Land South of New Rd, Chiseldon	30
s0078	Hodson Rd, Chiseldon	40
<b>Wanborough</b>		
s0079	Land off Hewers Close	25
s0221	North of Mayfield. West of Kite Hill, Wanborough	20
s0458	Croft Yard, Ham Road	9
<b>Bishopstone</b>		
s0066	Land west of New Town Lane, Bishopstone	12
s0425	West of Whatley's Orchard, Bishopstone	36
s0459	Land at The Forty, Bishopstone	30
<b>Castle Eaton</b>		
s0017	Land at School Close, Castle Eaton	39
<b>Inglesham</b>		
s0015	Land adjacent to Lechlade Rd and Lynt Rd, Upper Inglesham	75
s0228	Land at Lynt Road (rear of residential properties), Inglesham	8

Site ref	Site	Indicative no. of residential units
<b>Stanton Fitzwarren</b>		
s0301	Thames Water land at Stanton Fitzwarren	21
<b>Stratton St Margaret</b>		
s0011	Land adjacent to Fitzwarren House, Stanton Lodge and Fitzwarren Court, Kingsdown Rd, Swindon	11
s0026	Tate Estate, Kingsdown Rd, Upper Stratton	78
s0368	West of Catsbrain Farm	173
<b>South Marston</b>		
s0016	Land r/o 5 Church Farm Lane, South Marston	27
s0054	Land east of Highworth Road, South Marston	190
<b>Badbury</b>		
s0432	Land East of Berricot Lane, Badbury	15
<b>Kingsdown</b>		
s0380	Kingsdown Nurseries	93
s0450	East of Kingsdown Nursery	118
<b>St Andrews</b>		
s0055 and s0056 (s0374)	Land adjacent to Stepside, Blunsdon St Andrew	54
69	Burcot House, Blunsdon St Andrew	39

4.25 Based on assessment so far, the following assessed sites are not proposed to be taken forward for further consideration for the following reasons:

**Figure 4: Sites not proposed to be taken forward (rural areas)**

Ref	Site name	Reason for rejecting site
<b>Broad Blunsdon</b>		
s0033	Land south of B4019, Blunsdon	Site forms part of non-coalescence area with the Kingsdown development.
s0375	Land north of Kingsdown Lane	Site is detached from the village of Broad Blunsdon
s0377	Part of Upper Burytown Farm	The site comprises the Midvale Ridge slope and its development would cause significant landscape harm.
<b>Highworth</b>		

Ref	Site name	Reason for rejecting site
s0230	Land to the west of Swindon Road	The site is small and includes significant existing vegetation. It is felt that removal of this vegetation would diminish the character of the approach to Highworth on the Swindon Road. Additionally, it appears to be difficult to see how a successful relationship would be created between dwellings on the site and the public open space to the west.
s0477	Part of land west of Highworth	The site occupies a prominent hill top setting and it is felt that its development would cause significant landscape and visual harm.
<b>Chiseldon</b>		
s0028	Part of land south of New Rd	The site is a very open site with high sensitivity and the site would represent a significant encroachment into the countryside which would harm the AONB.
<b>Bishopstone</b>		
s0425	West of Whatley's Orchard	Significant landscape constraints
<b>Stratton St Margaret</b>		
s0011	Land adjacent to Fitzwarren House	Small site, capacity to be developed likely below the size of realistic plan allocations.
s0026	Tate Estate, Kingsdown Rd	Southern part of the site is occupied by an employment site and the northern part of the site is subject to significant landscape constraints
<b>South Marston</b>		
s0016	Land r/o 5 Church Farm Lane	Site is within setting of Grade I listed church and permission was recently refused for 8 dwellings for a number of reasons including impact on the setting of heritage assets (S/18/1483).
s0054	Land east of Highworth Road	Site is within setting of Grade I listed church also subject to flood risk.

Ref	Site name	Reason for rejecting site
<b>Kingsdown</b>		
s0380	Kingsdown Nurseries	Until the Kingsdown development comes forward, this site would be scattered development in the countryside. Development of the site appears incompatible with the currently proposed masterplan for the Kingsdown development.
s0450	East of Kingsdown Nursery	Until the Kingsdown development comes forward, this site would be scattered development in the countryside. Development of the site appears incompatible with the currently proposed masterplan for the Kingsdown development. It is unclear how access would be achieved.

#### Housing Site Options – Urban Areas

- 4.26 As part of the SHELAA 2019 a large number of urban area sites in Council ownership were assessed for their development potential. Maps of all sites are available on the Council's website on the SHELAA 2019 page: [https://www.swindon.gov.uk/info/20113/local\\_plan\\_and\\_planning\\_policy/647/monitoring\\_and\\_evidence\\_base/5](https://www.swindon.gov.uk/info/20113/local_plan_and_planning_policy/647/monitoring_and_evidence_base/5). The sites are also shown on the maps at Appendix 1.
- 4.27 The following urban sites are currently under consideration for housing development. These sites will be considered as potential site allocations within the Local Plan review.

**Figure 5: Proposed urban areas housing sites**

Site ref	Site name
s0083	Windmill Hill School, Uxbridge Road
S0099	North Star (mixed leisure and residential uses)
S0101	Tented Market (mixed retail and residential uses)
S0102	Kimmerfields (mixed employment, residential and other uses)
S0128 S0129 S0140 S0443	Swindon Station, Station Car Parks and Signal Point (residential as part of mixed use development).
S0132	Former Wyvern Car Park, Princess Street Car Park, Wyvern

S0147 S0148 S0171	Theatre and Theatre Square (residential uses likely to form part of cultural quarter development)
S0142	Locarno, Dammas Lane Car Park and The Planks Car Park (mixed residential and retail uses)
S0185	Triangular plot of land situated opposite the junction to Stroma Way. East of St Michael's Avenue, Highworth
s0200	South of Medway Road, Haydon Wick
s0239	Groundwell Park and Ride
s0244	Land fronting Idovers Drive west of Hazelwood Academy, Mannington Ref
s0288	Land East of 261, Marlborough Road (supported living bungalows)
s0314	Land to West of Cheney Manor Ind. Estate (Moredon)
s0367	Lovell Close, Covingham
s0436	Depot, County Ground

- 4.28 The above list includes the regeneration sites at Kimmerfields, Swindon Station, The Locarno, North Star and Wyvern Car Park/Theatre Square which are proposed to be developed for mixed uses. We are proposing draft site allocation policies for these sites in the draft development management policies.
- 4.29 There are understood to be no current proposals to develop the Council-owned sites listed in Figure 6 below which were assessed as either 'developable' or 'possibly developable' for residential uses within the SHELAA 2019. Therefore these sites are not being carried forward as potential site allocations within the Local Plan review. Additionally, Figure 7 lists non-council-owned sites which were assessed as developable or possibly developable for residential uses in the SHELAA 2019 but are not being taken forward as proposed allocations.
- 4.30 An announcement on the future of site s0100 Aspen House, is expected in August 2019. The site is likely to be developed ahead of the Local Plan review and is therefore not being considered for allocation.

**Figure 6: Sites not proposed to be taken forward (urban areas, Council owned)**

Site ref	Site name
s0070	Nythe Complex
s0082	Land bounded by Netherton Close/ Cranemore Avenue/ Keswick Road
s0092	Hazelmere Close/ Netherton Close, Rear of Flats 184- 194, Park

Site ref	Site name
	South
s0096	Banwell Avenue/ Hartland Close/ Welcombe Avenue, Park North (backland)
S0100	Aspen House and Granville Street Car Park <sup>1</sup>
s0122	39-45 Fleet Street, Swindon
s0133	Commercial Road Car Park
S0146	The Parade Multi-Storey Car Park (John Street)
s0183	Land to the east of Newburgh Place, in front of Tesco Express
s0186	West of Stonecrop Way
s0188	Land south of Ventnor Close, west of Shanklin Road (next to the allotments)
s0191	Land at Pinehurst Road inside 'The Circle'
s0193	Land east of Coombe Road. Behind 24-50 Coombe Road,
s0194	South of Scarborough Road. Next door to 12 Scarborough Road.
S0198	South of Haydon Court
s0204	In front of 68 Oaksey Road
s0205	At the end of Marston Avenue
s0207	North of Huntley Close
s0209	North of Bromley Close
s0210	South of Bromley Close
s0213	Behind 86 Shaftesbury Avenue
s0214	In front of 31 Midhurst Avenue
s0215	East of Clanfield Road
s0216	West of Clanfield Road
s0217	Opposite 167 Welcombe Avenue
s0218	West of Barnstaple Close
s0222	Beside 2 Crawford Close
s0224	South of Bembridge Close
s0225	North of Monkton Close
s0233	Castle View Depot and garages
s0236	Land to the east of Ridge Green Road, north of nursery
s0237	Triangle site to east of Shaw Ridge Car Park
s0245	Manor Garden Centre and surrounding
s0246	Garage block east of Greenhill Road
s0252	Land north of Eldene Drive
s0255	Holiday Inn Site
s0258	West of Alanbrooke Crescent
s0264	Garages at Wingfield Avenue
s0265	Land between 19-41 Wilcot Ave and Cricklade Rd

<sup>1</sup> See paragraph 4.30 above.



Site ref	Site name
s0266	North of Charlton Cl adj. to Cricklade Rd
s0267	East of Charlton Cl adj. to Cricklade Rd
s0268	Land behind Pewsham Rd
s0270	Land above South of Penhill Dr
s0271	Land South of Leigh Rd
s0272	Ringwood Close, Park North
s0276	Liden Local Centre
s0278	Land east of Tedder Close (Southbrook)
s0290	Land at Hillary Close
s0291	Land west of Hawthorn Avenue
s0296	Land to the rear of Courtenay Road
S0311	Petrol Filling Station, Rodbourne Road
S0313	Toothill Village Centre
S0315	Stratton Education Centre
S0366	Land west of Hillmead Drive (HM4)
S0381	The Limes, Stratton St Margaret
S0430	Brunel West Car Park and House of Fraser, Swindon

**Figure 7: Sites not proposed to be taken forward (urban areas, non-Council-owned) as a result of consent, pending decision or lack of developer interest.**

Site ref	Site name	Reason
S0068	Prebendal Farm, Bishopstone	Site now has planning permission for 5 dwellings S/18/1709
s0088	Former Oakfield Campus	Application S/19/0192 for 239 dwellings awaiting determination. It is likely that this application will be determined significantly in advance of the Local Plan review being adopted.
S0157	Land South of Church Road, Old Town	Application S/18/0545 awaiting determination. It is likely that this application will be determined significantly in advance of the Local Plan review being adopted.
S0158	Pope Bros Builders Yard, Cricklade Street	Application S/18/0447 awaiting determination. It is likely that

		this application will be determined significantly in advance of the Local Plan review being adopted.
S0319	54 – 55 Bridge Street Swindon SN1 1BL	No planning activity on site since lapse of permission S/13/1723. Site not known to be available for development.
S0330	Anglia House, 115-118 Commercial Road, Swindon	No planning activity on site since lapse of permission S/PRIORC/15/0748. Site not known to be available for development.

## 5. Planning for Employment Land

### How Much Employment Land?

- 5.1 The Swindon Employment Land Review 2017 (ELR 2017) provides a range of scenarios for 2016-2036 employment land requirements based on information supplied by the leading economic forecasting companies and past completion rates.
- 5.2 Based on this evidence, additional office land requirements are between 2.4ha and 10.2ha. This equates to a floor space requirement of **16,000sqm to 67,700sqm**. As the amount of land required to deliver office development depends on whether it is built at town centre or out-of-town plot ratios, it is clearer to present the requirement in terms of floor space.
- 5.3 The ELR 2017 identifies a range of industrial land requirement scenarios from **-9.3ha and +56.7ha** (2016-2036).
- 5.4 The current supply position is as follows:

**Figure 8: Employment land supply position**

	Industrial		Office	
	Consented or under development <sup>2</sup>	Allocated	Consented or under development <sup>3</sup>	Allocated
Land area	76.75ha	11.41ha (assumed 6.25ha at Wichelstowe and 5.16ha at Gateway North)	2.55ha	circa 10ha (assumed 6.25 ha at Wichelstowe, 2.5ha at NEV, a further 0.3ha at Kimmerfields and 1.09ha at Drakes Meadow)
Floorspace	229,700sqm	tbc	19,404sqm	tbc

- 5.5 The Honda site of 138.94 hectares will also likely be available following the recent announcement of the plant's closure.
- 5.6 Overall, therefore, sites are identified sufficient to deliver the identified 2016-2036 requirements for office (of 16,000sqm to 67,700sqm) and industrial land (of between -9.3ha and +56.7ha).
- 5.7 Notwithstanding the lack of identified quantitative need, the ELR 2017 lists possible reasons for allocating additional land for development:
- 5.7.1 To provide short-term supply to guard against the potential that important allocations which are identified as being subject to delivery barriers (Wichelstowe and parts of New Eastern Villages) continue to be delayed in coming forward.
- 5.7.2 To meet 'qualitative demand' identified by local commercial land agents consulted as part of preparation of that report, in particular in the industrial market to provide choice to occupiers and allow existing local businesses to expand.

<sup>2</sup> The Employment Land Review 2017 excludes sites that are under construction from its assessments of demand-supply balance. However, as such sites would be developed within the 2016-2036 time horizon used in the Review, it is considered that they should be counted as contributing to meeting the identified requirements for employment floorspace in that time period.

<sup>3</sup> See FN3.

- 5.7.3 To support new inwards investment, for example through a strategic office/business park and/or industrial land on the strategic road network to appeal to new businesses moving to the area.

### Employment Land Options

- 5.8 In light of the above, it is considered that reasonable options for employment land are as follows:

#### **Figure 9: Employment land options**

##### **Option E1 - Consolidation**

In view of the fact that sufficient land is already identified to meet needs for employment floorspace in the period to 2036, it would be a reasonable option to allocate no further employment development land, particularly as the Honda site has the potential to accommodate additional employment beyond the current use.

##### **Option E2 – Small Sites Only**

A few smaller sites are identified within settlement boundaries and it would be a reasonable option to allocate one or more of these for employment uses to assist in meeting the qualitative demand identified in the ELR 2017 and to provide choice to local businesses.

##### **Option E3 – Small and Large Sites**

Allocate a strategic scale employment site on greenfield land either within or outside of the Borough, in addition to smaller employment sites within existing settlement boundaries. This would represent a 'policy on' approach of seeking to allocate land to secure inwards investment to the Borough. The Borough Council has historically adopted that approach and the ELR recommends that it is considered going forward. This is therefore considered also to be a reasonable option.

- 5.9 These options are appraised in the Interim Sustainability Appraisal report.

### Employment Site Options

- 5.10 Figure 10 lists the employment site options that are being considered. Except for the Kimmerfields, Swindon Station, Carriageworks and Cultural Quarter sites (all of which are within the existing defined central area and area therefore suitable for employment use without any policy change), the below sites are considered in the Interim Sustainability Appraisal report:

**Figure 10: Employment site options**

Site ref	Site name	Site area
s0073	Land north of A420	2.78
s0102	Kimmerfields (mixed use employment, residential and other uses)	4.34
S0128 S0129 S0140 S0443	Swindon Station, Station Car Parks and Signal Point (workplaces as part of mixed use development).	
S0132 S0147 S0148 S0171	Former Wyvern Car Park, Princess Street Car Park, Wyvern Theatre and Theatre Square (workplaces likely to form part of cultural quarter development)	1.27
S0150	The Carriageworks (mixed employment and educational uses)	1.52
S0298	Barnfield Road	0.75ha
S0402	South of Gateway North	2.34ha
S0030	Lower Widhill Farm Blunsdon	26.46ha
S0048	Land North of Blunsdon (as part of strategic allocation)	140.6ha

- 5.11 SHELAA 2019 site S0034 Land at Inlands Farm, Wanborough is assessed in the SA despite it having been rejected in the SHELAA. Site 0034 was rejected in the SHELAA for the following reasons: “As such, the site is undeliverable unless capacity improvements over and above those planned to the SCR, A419 and M4 J15 are secured. Additionally the site is unsuitable due to landscape and heritage constraints”. The site is subject to a current planning application and is promoted as a strategic employment site.
- 5.12 Pending the decision on the current planning application and the likely promotion of the site by the landowner/developer as an allocation in the local plan. To ensure a consistent approach, the site will be additionally assessed through the SA.
- 5.13 Figure 11 below provides a list of sites identified as the SHELAA as developable or possibly developable for employment uses but which are not being taken forward as potential site allocations. The list includes a number of

sites within Key Employment Areas which were identified as developable or possibly developable within the SHELAA. As these sites have existing employment designations, they are not considered for allocation within the revised plan. If they were to come forward for development, they would contribute to meeting the Borough's requirement for employment land. Sites s0401 North of Gateway North and s0024 Oak House, Rivermead Drive, Swindon were promoted through the SHELAA 2019 for residential development, but it is proposed to retain their employment area designations.

**Figure 11: Employment sites not proposed to be taken forward**

Site ref	Site name	Reason
006	Land north of Edison Road, Dorcan	Within key employment area. Site has planning permission S/18/1906 for logistics and distribution centre (B8)
024	Oak House, Rivermead Drive	Site is already within a key employment area
090	Coal Yard, Signal Way	Site is already within a key employment area
111	Thornhill Industrial Estate	Site already built out for employment uses
146	The Parade Multi Storey (John Street Car Park)	Site not proposed to be taken forward for employment uses
239	Groundwell Park and Ride	See above, site being considered as a housing development site
297	Pipers Way Park and Ride	Future options for site being considered but site has not been put forward as an employment site allocation in the plan.
397	Keypoint K3	Site has planning permission S/16/1055 for Erection of a Renewable Energy Centre with associated plant, infrastructure , associated works and a B8 warehouse with associated plant and a vehicular access (EIA Development
398	Keypoint K5	Site is already within a key employment area
399	Drakes Meadow	Site is already within a key employment area
401	North of Gateway North	Site is already within a key employment area
402	South of Gateway North	Site is already within a key

		employment area
424	Former Zarlink Factory, Darby Close, Swindon	Availability of site for development not confirmed
447	Land At Rivermead Drive, Rivermead Industrial Estate, Rivermead Drive, Swindon	Availability of site for development not confirmed

## 6. Gypsy and Traveller Accommodation Needs

- 6.1 The recently completed Gypsy and Travellers Accommodation Needs Assessment identifies a requirement in the Borough of an additional 11 to 23 gypsy/travellers pitches and 14 additional travelling show-people plots for the period 2018-36.
- 6.2 As part of this consultation we are asking landowners to put forward sites that may be suitable for accommodating this need.

## 7. Consultation Questions

- 7.1 We are seeking your views on the questions in Figure 12 below. All responses to the consultation should be made using the Council's Objective Consultation Portal: <https://swindon-consult.objective.co.uk/portal/>

### Figure 12: Consultation questions

#### Question 1 Development Management Policies

We welcome comments on the proposed development management policies.

Comments should identify the specific policy number to which they relate and should state whether the policy is supported or alternatively what amendments are considered necessary and why.

Suggestions for amendments should be made by reference to the tests in paragraph 35 NPPF, namely that policies should be positively prepared, justified, effective and consistent with national policy.

### **Question 2 – Housing Distribution Options**

Please provide comments on:

- the relative sustainability, and/or
- deliverability, and/or
- community infrastructure needs,

of the housing distribution options identified in Figure 2 above.

### **Question 3 – Housing Sites**

Please provide your comments on the housing sites still under consideration. We are particularly interested in hearing about the deliverability of sites and the infrastructure needed to support them.

### **Question 4 – Employment Options**

Please provide your comments on the relative sustainability and/or deliverability of the employment land options identified in Figure 9 above.

### **Question 5 – Employment Sites**

Please provide your comments on the employment sites still under consideration. We are particularly interested in hearing about the deliverability of sites and the infrastructure needed to support them. We are also interested in hearing about potential additional employment sites.

### **Question 6 – Gypsy and Traveller Sites**

Please provide details of land that is considered suitable and available for the development Gypsy and Traveller accommodation sites.

## **8. Supporting Documents**

8.1 The following documents are published in support of this consultation:

8.1.1 Swindon Borough Council and Wiltshire Council Local Housing Needs Assessment 2019 (Opinion Research Services)



- 8.1.2 Swindon Borough Gypsy and Traveller Accommodation Needs Assessment 2019 (RRR Consultancy)
- 8.1.3 Report on the issues and options consultation 2017
- 8.1.4 Draft development management policies 2019
- 8.1.5 Swindon Borough Council Interim Sustainability Appraisal Report 2019
- 8.1.6 Town Centre Uses Topic Paper
- 8.1.7 Climate Change Topic Paper
- 8.1.8 Air Quality Topic Paper
- 8.1.9 Specialist Housing Topic Paper
- 8.1.10 Hot Food Takeaways Topic Paper
- 8.1.11 SFRA Level 1 (Aecom)
- 8.2 Previously published Local Plan evidence documents, including the SHELAA 2019, are available on the Council's website view the following link:  
[https://www.swindon.gov.uk/info/20113/local\\_plan\\_and\\_planning\\_policy/647/monitoring\\_and\\_evidence\\_base/4](https://www.swindon.gov.uk/info/20113/local_plan_and_planning_policy/647/monitoring_and_evidence_base/4)

## **9. Next Steps**

- 9.1 We will use the information gathered in this consultation to develop the Council's preferred approach for the Local Plan review. We aim to publish our pre-consultation version of the plan for public consultation in winter 2019-20.

## **Appendix 1 – Maps of Sites**

1. Castle Eaton, Blunsdon and St Andrews
2. Wroughton and Chiseldon
3. Wanborough, Liddington, Bishopstone
4. Stratton St Margaret and South Marston
5. Highworth, Inglesham, Hannington, Stanton Fitzwarren
6. Haydon Wick
7. Central Swindon North
8. Central Swindon South, Nythe, Eldene, Liden, Covingham
9. West Swindon
10. Swindon Town Centre Inset

This document may be viewed or downloaded from our website  
[https://www.swindon.gov.uk/info/20113/local\\_plan\\_and\\_planning\\_policy/647/monitoring\\_and\\_evidence\\_base](https://www.swindon.gov.uk/info/20113/local_plan_and_planning_policy/647/monitoring_and_evidence_base)

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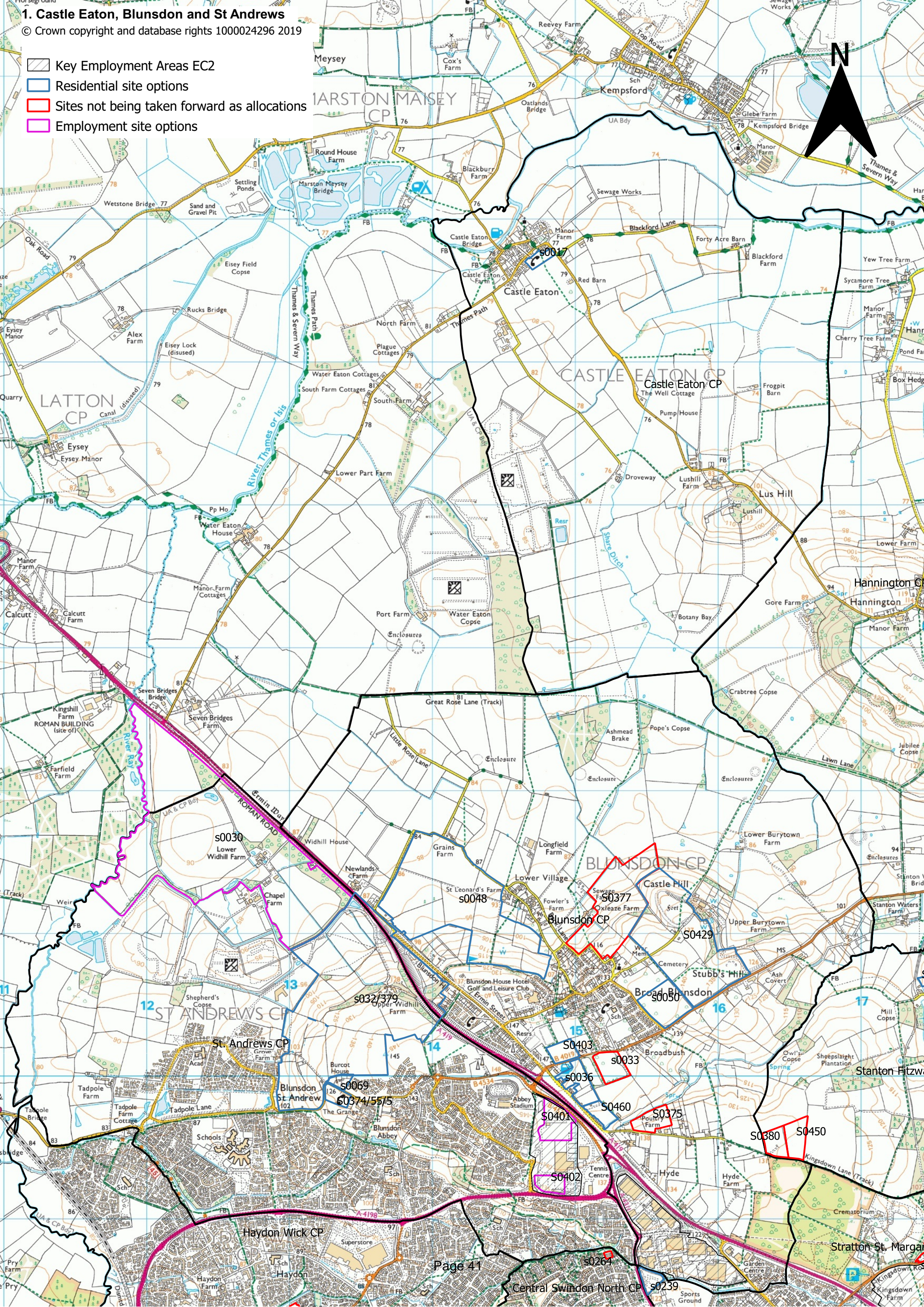
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# 1. Castle Eaton, Blunsdon and St Andrews

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- Key Employment Areas EC2
- Residential site options
- Sites not being taken forward as allocations
- Employment site options





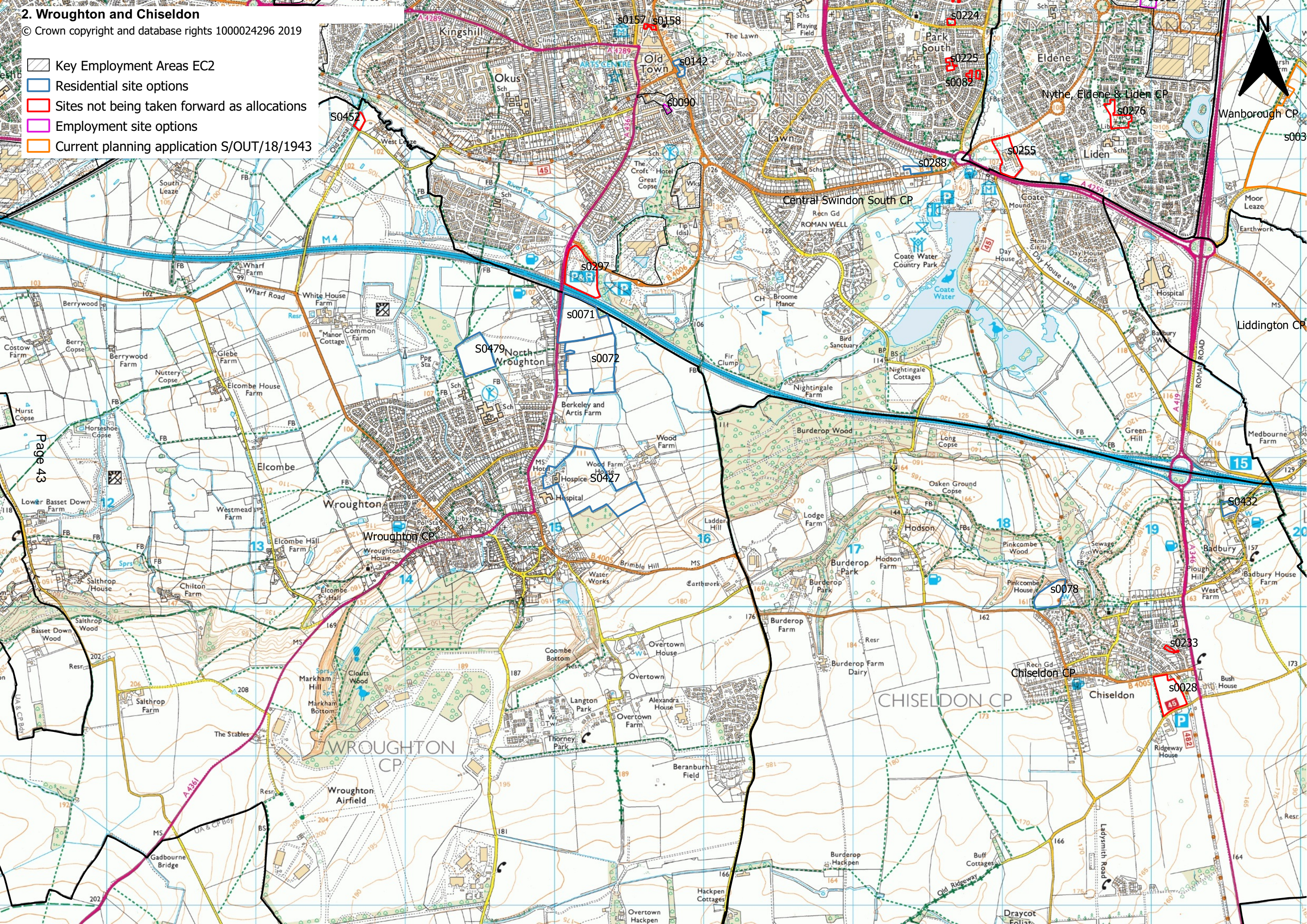
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## 2. Wroughton and Chiseldon

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- Key Employment Areas EC2
- Residential site options
- Sites not being taken forward as allocations
- Employment site options
- Current planning application S/OUT/18/1943

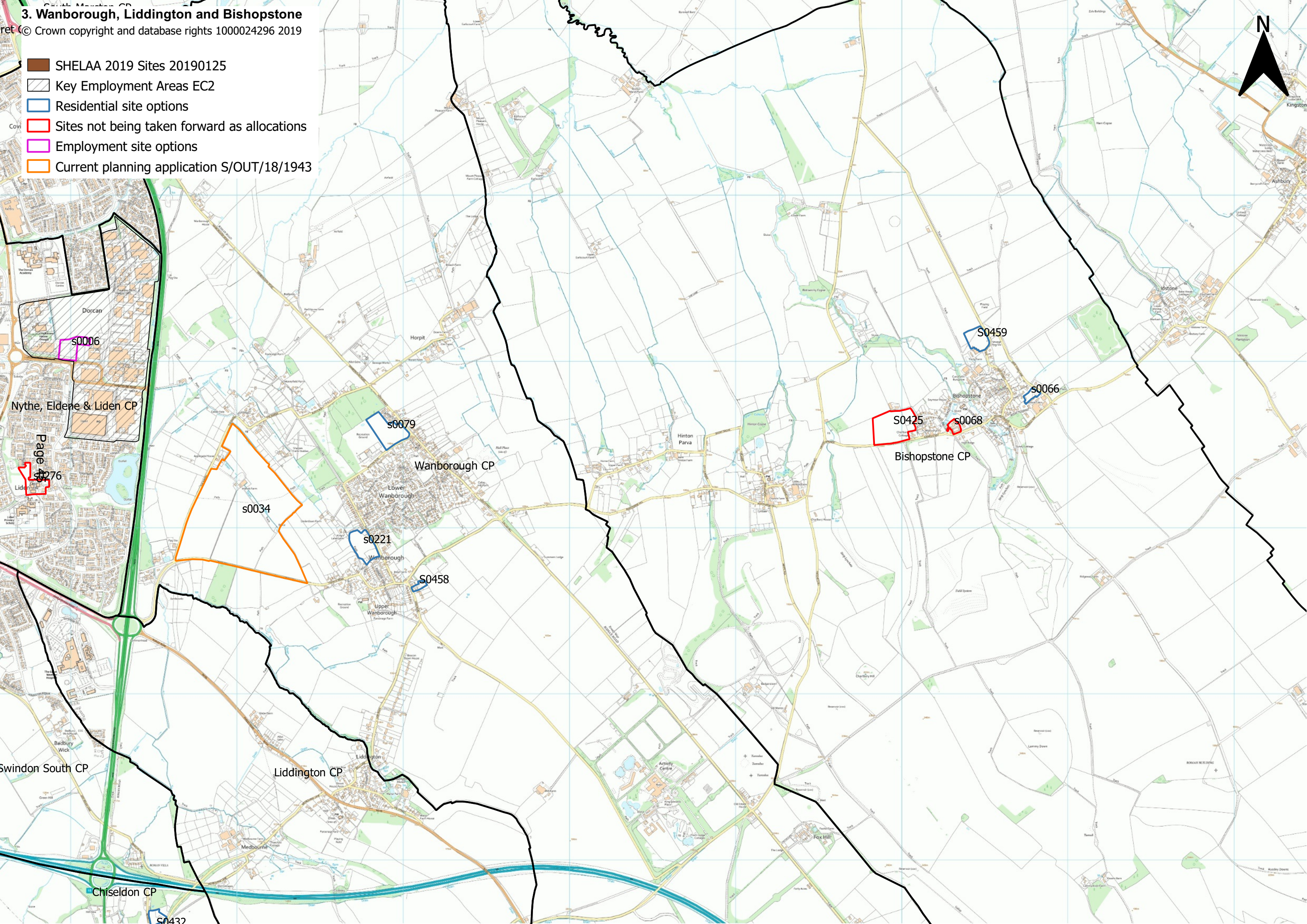




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- SHELAA 2019 Sites 20190125
- Key Employment Areas EC2
- Residential site options
- Sites not being taken forward as allocations
- Employment site options
- Current planning application S/OUT/18/1943





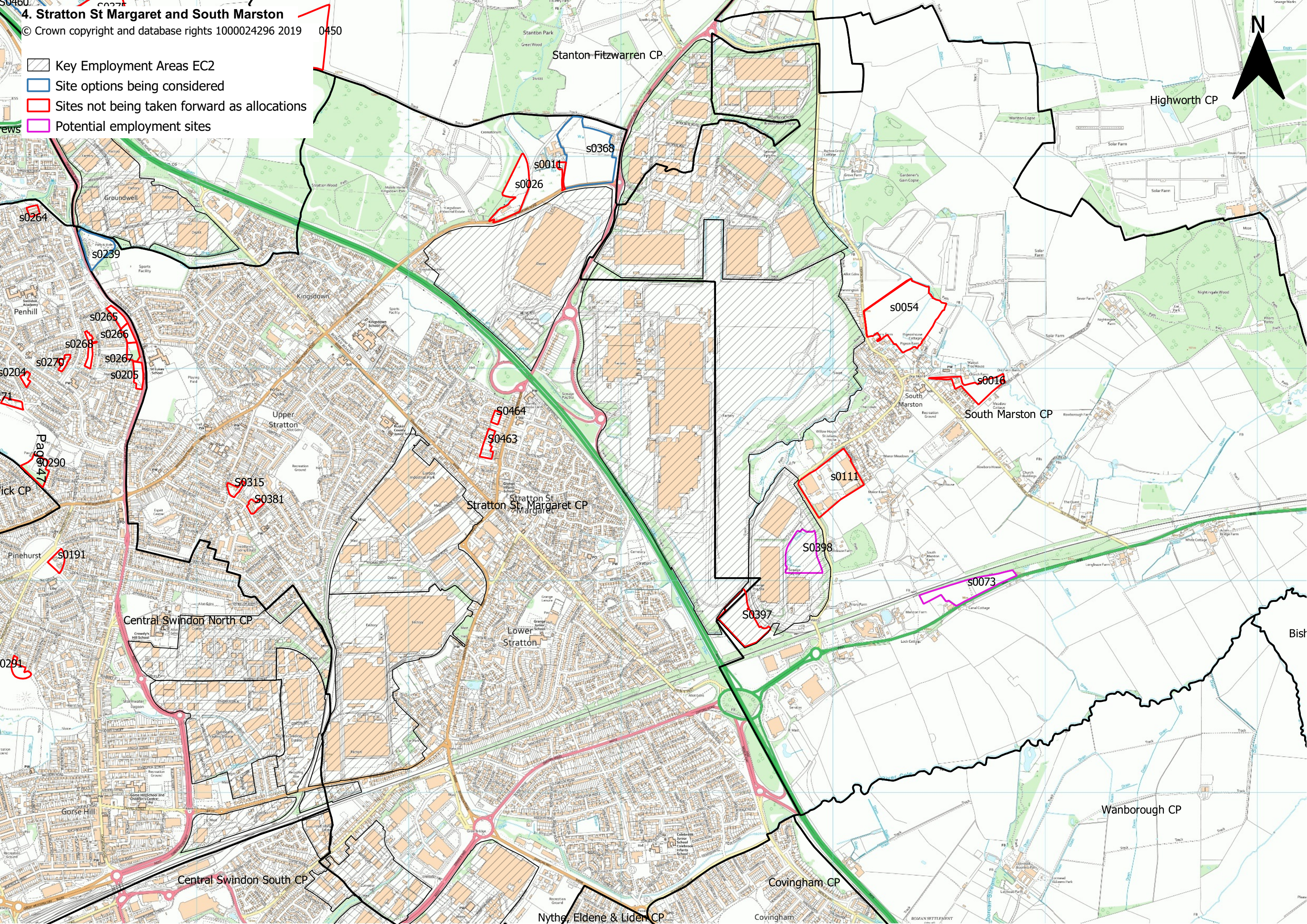
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#### 4. Stratton St Margaret and South Marston

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- Key Employment Areas EC2
- Site options being considered
- Sites not being taken forward as allocations
- Potential employment sites





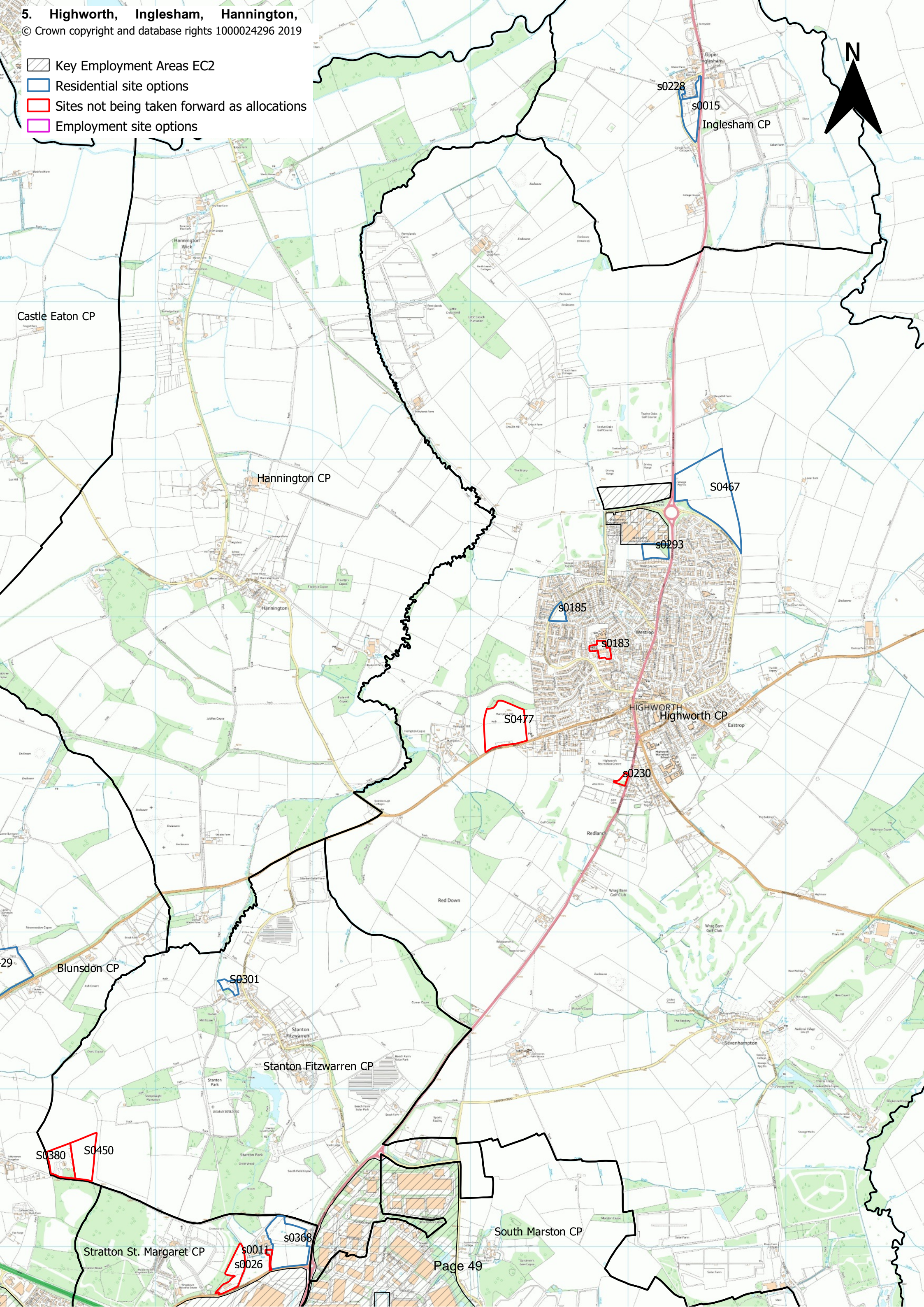
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5. Highworth, Inglesham, Hannington,

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- Key Employment Areas EC2
- Residential site options
- Sites not being taken forward as allocations
- Employment site options





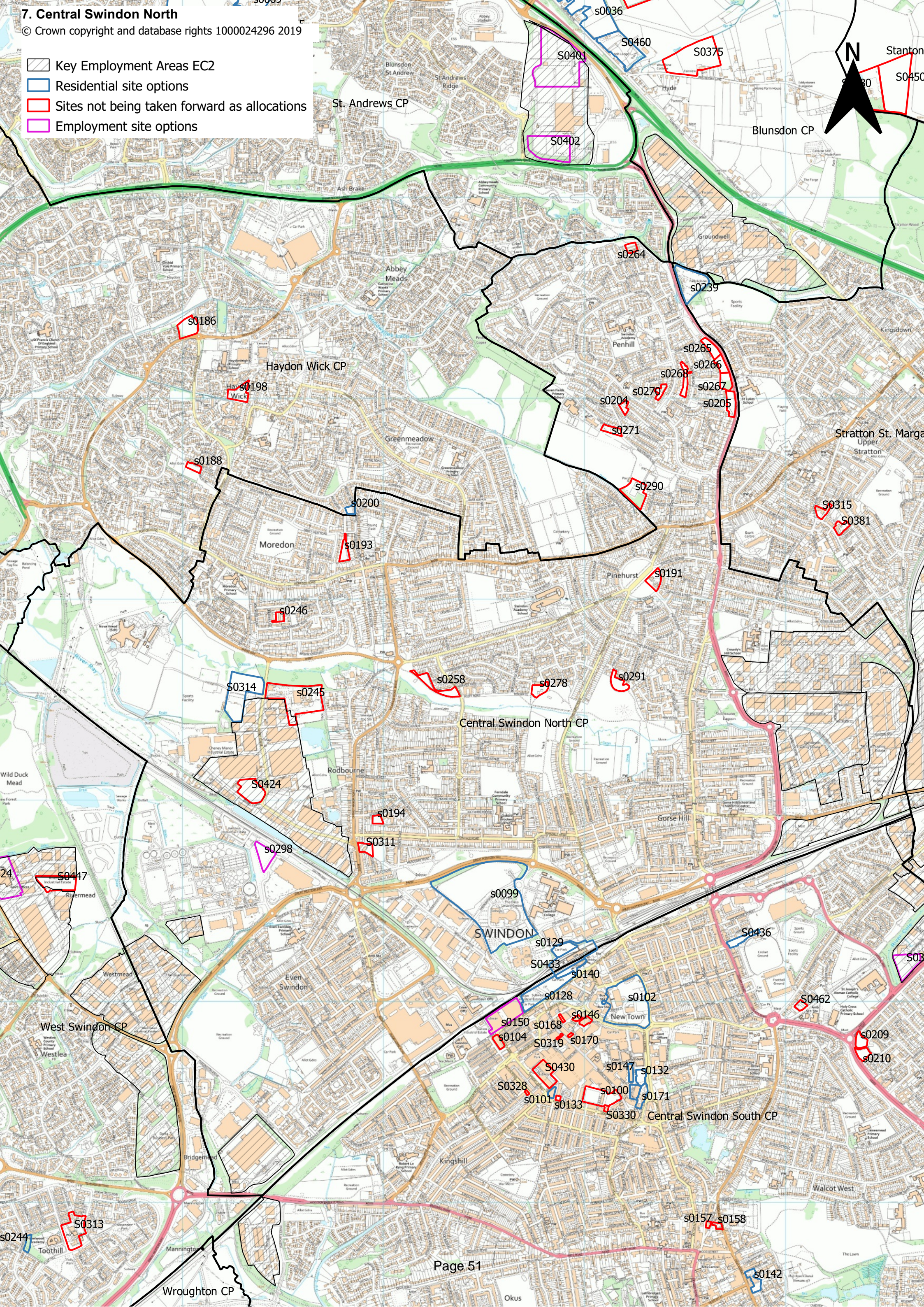
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7. Central Swindon North

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- Key Employment Areas EC2
- Residential site options
- Sites not being taken forward as allocations
- Employment site options









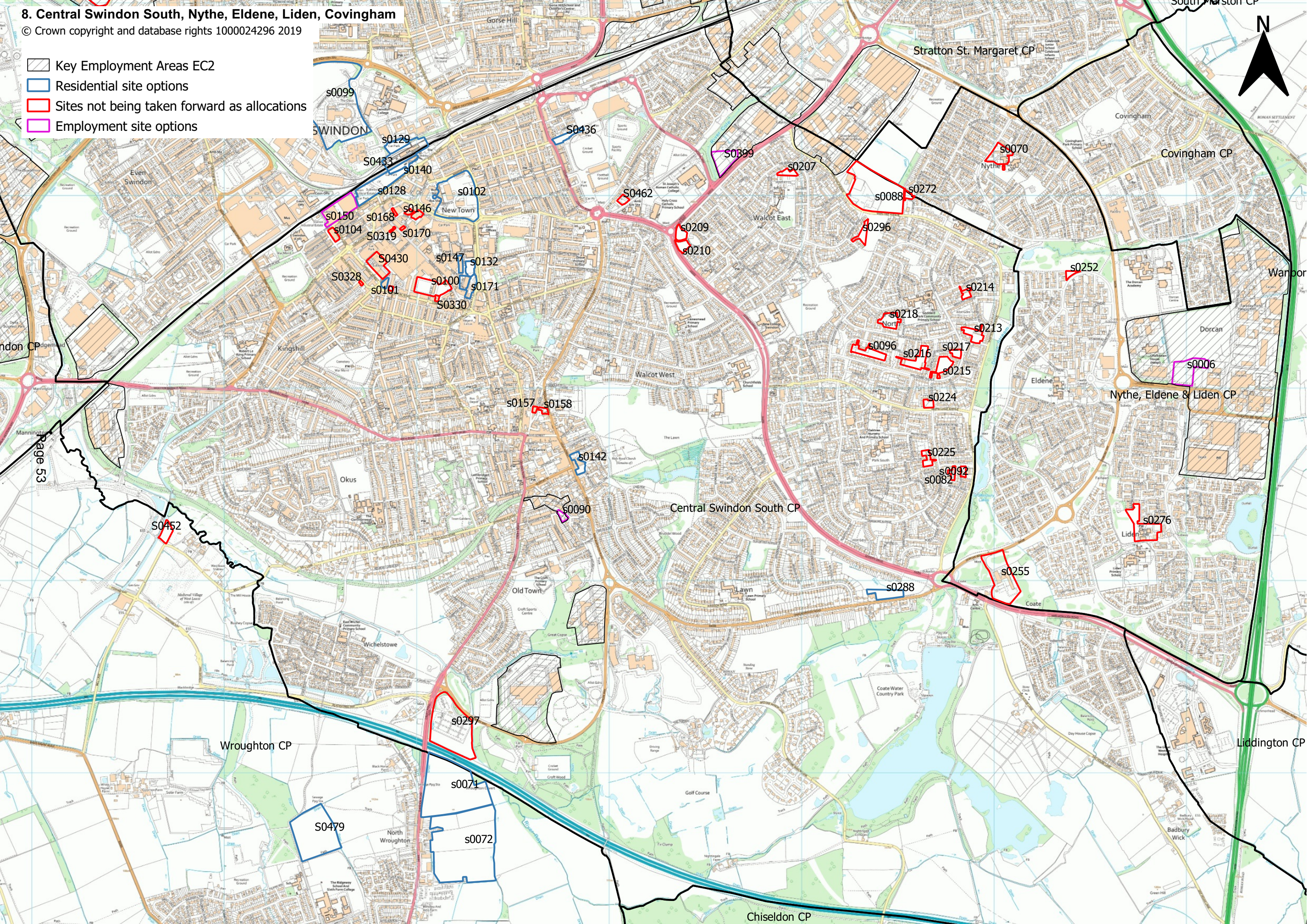
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**8. Central Swindon South, Nythe, Eldene, Liden, Covingham**

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-  Key Employment Areas EC2
-  Residential site options
-  Sites not being taken forward as allocations
-  Employment site options







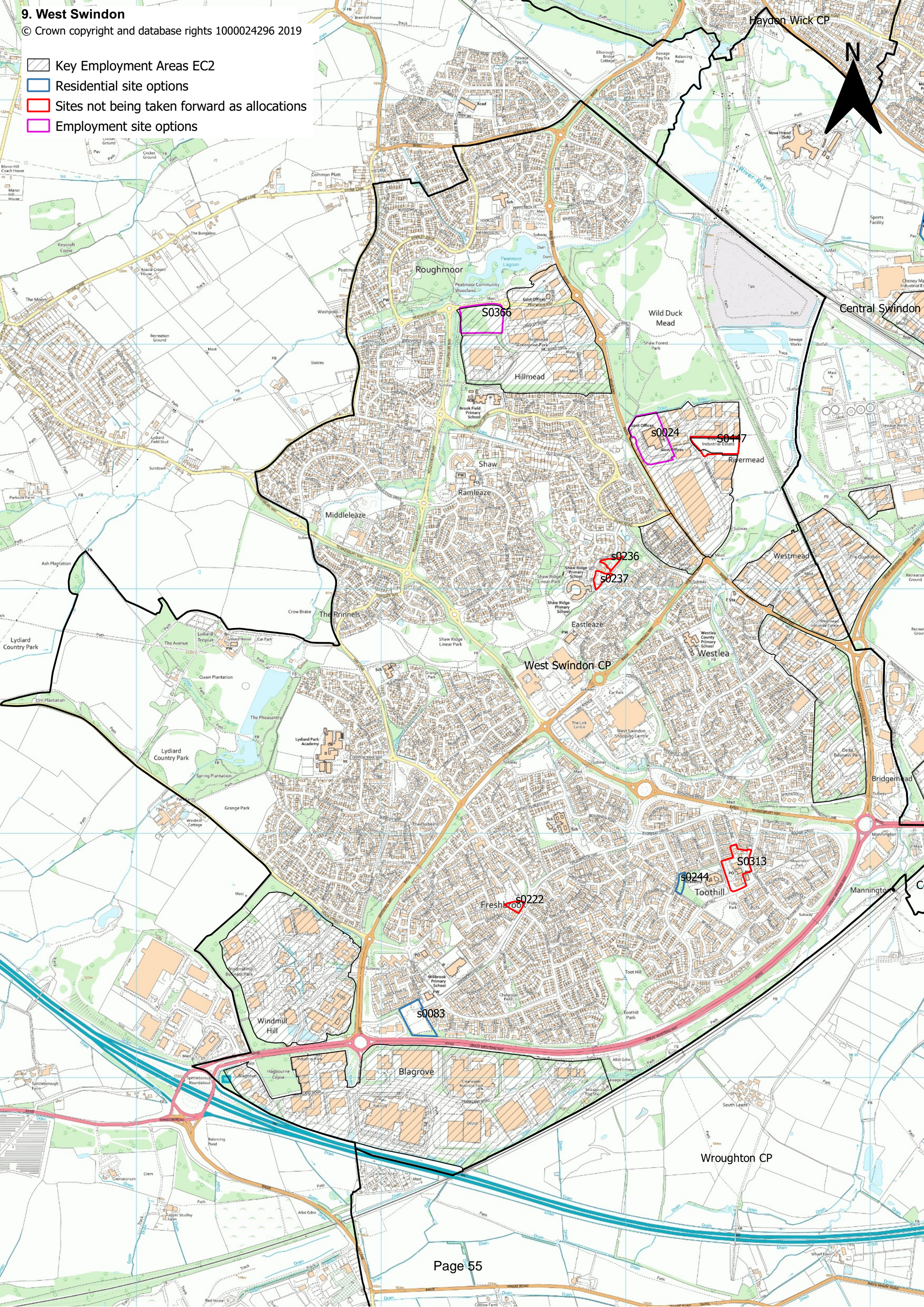


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-  Key Employment Areas EC2  
 Residential site options  
 Sites not being taken forward as allocations  
 Employment site options





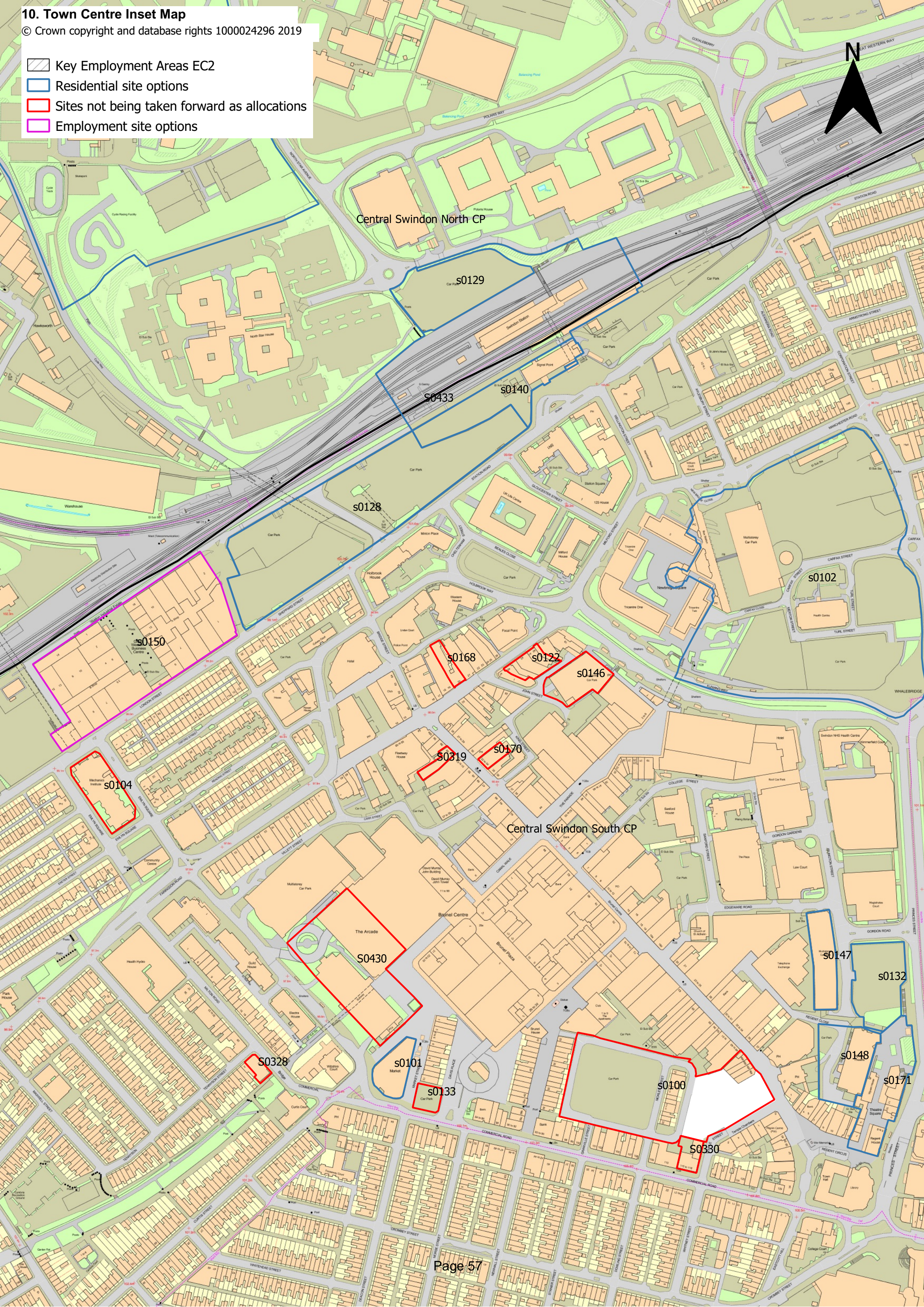
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10. Town Centre Inset Map

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- Key Employment Areas EC2
- Residential site options
- Sites not being taken forward as allocations
- Employment site options





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## **APPENDIX 2**

### **Draft Development Management Policies**





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## 1 Table of policies

The table below shows the proposed replacements for the policies of the Swindon Borough Local Plan 2026. We aim to reduce 45 development management policies at present to circa 35 in the new plan.

However, we will be proposing increasing the number of site allocation policies from the present 5, to: (1) reflect a greater emphasis on allocating sites of a range of sizes and in a range of locations, and (2) to promote and seek to secure good design on the major regeneration sites.

Local Plan 2026 Policy	Proposed Local Plan 2036 Policy
SD1: Sustainable Development Principles	Not carried forward
SD2: The Sustainable Development Strategy	To be confirmed
SD3: Managing Development	Not carried forward
DE1: High Quality Design	Policy DM 1 'Place Making Principles' Policy DM 2 'Design of Buildings' Policy DM 3 'Design in Larger Developments'
DE2: Sustainable Construction	Not carried forward
EC1: Economic Growth through Existing Business and Inward Investment	Not carried forward
EC2: Employment Land and Premises (B Use Classes)	Policy DM 5 'Core Employment Sites' Policy DM 6 'Employment Land' Policy DM 7 'Office Development'
EC3: The Role of the Centres and Main Town Centre Uses	Policy DM 9 'Centres and Main Town Centre Uses (Excluding Offices)' Policy DM 10 'Land Uses Within Centres'
EC4: Conversions of Buildings to Employment Use in the Countryside	Policy DM 36 'Development in the Countryside'
EC5: Farm Diversification	Policy DM 36 'Development in the Countryside'
HA1: Mix, Type and Density	Policy DM 14 'Mix and Density'
HA2: Affordable Housing	Policy DM 15 'Affordable Housing'
HA3: Wheelchair Accessible Housing	Policy DM 17 'Accessible Housing'
HA4: Subdivision of Housing / Houses in Multiple Occupation	Not carried forward

## 1 Table of policies

Local Plan 2026 Policy	Proposed Local Plan 2036 Policy
HA5: Rural Exception Sites	Policy DM 36 'Development in the Countryside'
HA6: Agricultural Workers Dwellings	Policy DM 19 'Agricultural Workers' Dwellings'
HA7: Conversion of Buildings to Residential Use in the Countryside	Policy DM 36 'Development in the Countryside'
HA8: Gypsies, Travellers, and Travelling Showpeople Pitches and Sites	Policy DM 21 'Gypsies', Travellers' and Travelling Showpeople's Pitches and Sites '
TR1: Sustainable Transport Networks	Policy DM 22 'Transport and Development'
TR2: Transport and Development	Policy DM 22 'Transport and Development'
IN1: Infrastructure Provision	Policy DM 23 'Infrastructure Requirements Resulting from Development'
IN2: Water Supply and Wastewater	Policy DM 24 'Water Supply and Wastewater and Sewerage Infrastructure'
IN3: ICT & Telecommunications	Policy DM 26 'ICT and Telecommunications'
IN4: Low Carbon and Renewable Energy	Policy DM 25 'Low Carbon and Renewable Energy'
CM1: Education	Not carried forward
CM2: Active, Healthy and Safe Lifestyles	Not carried forward
CM3: Integrating Facilities and Delivering Services	Not carried forward
CM4: Maintaining and Enhancing Community Facilities	Policy DM 27 'Community Facilities'
EN1: Green Infrastructure Network	Policy DM 28 'Green Infrastructure'
EN2: Community Forest	Policy DM 29 'Great Western Community Forest'
EN3: Open Space	Policy DM 30 'Protecting Open Space' Policy DM 31 'Open Space in New Development'
EN4: Biodiversity and Geodiversity	Policy DM 32 'Biodiversity '
EN5: Landscape Character and Historical Landscape	Policy DM 33 'Landscape'
EN6: Flood Risk	Policy DM 34 'Flood Risk'
EN7: Pollution	Policy DM 35 'Pollution'
EN8: Unstable Land	Policy DM 35 'Pollution'

## 1 Table of policies

Local Plan 2026 Policy	Proposed Local Plan 2036 Policy
EN9: Contaminated Land	Policy DM 35 'Pollution'
EN10: Historic Environment & Heritage Assets	'Historic Environment Policy Options'
EN11: Heritage Transport	'Heritage Transport Options'
SC1: Swindon's Central Area	Not carried forward
SC2: Swindon's Existing Urban Communities	Not carried forward
NC1: Wichelstowe	Policy SA 1 'Wichelstowe'
NC2: Commonhead	Not carried forward
NC3: New Eastern Villages	Policy SA 3 'New Eastern Villages - Including Rowborough and South Marston Village Expansion'
NC4: Tadpole Farm	Not carried forward
NC5: Kingsdown (East of A419)	Policy SA 2 'Kingsdown'
RA1: Highworth	Not carried forward
RA2: Wroughton	Not carried forward
RA3: South Marston	Not carried forward
LN1: Local and Neighbourhood Planning	Not carried forward

### Proposed Policies Covering New Topics

The following policies cover new topic areas that do not appear in Local Plan 2026:

Policy LA 1 'Kimmerfields'

Policy LA 2 'North Star'

Policy LA 3 'Swindon Railway Station'

Policy LA 4 'Cultural Quarter'

Policy LA 5 'Hospital Expansion Land'

Policy LA 6 'The Old Town Hall and Corn Exchange'

Policy DM 4 'Inclusive Design '

Policy DM 8 'Retail and Leisure on Employment Land'

Policy DM 11 'Hot Food Takeaways, Drinking Establishments, Betting Offices and Payday Loan Shops'

Policy DM 12 'Supporting the Night Time Economy'

## 1 Table of policies

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Policy DM 13 'Residential Standards'

Policy DM 16 'Housing for Older People'

Policy DM 17 'Accessible Housing'

Policy DM 18 'Annex Accommodation'

Policy DM 20 'Housing on Retail Parks'

# 1 New Communities

## 1.1 SA1 Wichelstowe

### Policy SA 1

#### Wichelstowe

1. Land at Wichelstowe, as defined on the policies map, is allocated for a mixed-use development.
2. The development at Wichelstowe shall provide:
  - a. a total of 4,500 homes (including those already completed);
  - b. 12.5 hectares of employment land within Use Class B1 and B2;
  - c. a total of 4 local centres, one of which includes a food store with 2,000 – 2,500m<sup>2</sup> floorspace in the central neighbourhood;
  - d. a total of 3 (2 forms-of-entry) primary schools (or an additional 6 forms-of-entry);
  - e. a secondary school;
  - f. public open space in accordance with the Borough Council's Open Space Standards and extending the River Ray green corridor to the wider countryside;
  - g. high quality public realm;
  - h. community facilities as follows:
    - i. a leisure centre associated with the secondary school; or a combination of on-site leisure facilities and increased capacity and improvements at Croft and Ridgeway;
    - ii. buildings for use by the community, service providers and for worship, including dual-use facilities at all schools;
    - iii. police / emergency services point; and
    - iv. health care facilities including GP surgery, dentist and pharmacy in the central neighbourhood.
3. Development at Wichelstowe shall protect, enhance and integrate with existing environmental assets, including:
  - a. the historic environment including the Scheduled Monument of Westleaze Medieval Village;
  - b. biodiversity, including Old Town Railway Path County Wildlife Site, the river corridors and natural springs;
  - c. the North Wessex Downs AONB landscape and views from it; and
  - d. off-site landscape and biodiversity mitigation south of the M4.
4. The development at Wichelstowe shall provide sustainable transport links that integrate with Swindon including:
  - a. an express bus link to Swindon Town Centre and additional public transport links within the site;
  - b. walking and cycle links to Swindon's existing communities and the wider countryside;
  - c. a link to Junction 16 of the M4;
  - d. a link from Croft Road to Hay Lane; and
  - e. a Park and Ride site.

## 1 New Communities

5. The risk of flooding shall be minimised, both within the development and adjacent properties.
6. The route for the Wilts & Berks Canal, as set out on the policies map, shall be safeguarded and protected from development.
7. The character and identity of Wroughton will be protected by a principle of non-coalescence between the settlements. The land between Wichelstowe and the village shall remain part of the countryside. However, small scale development within this area, as defined on the Policies Map, will be permitted where it retains or enhances the existing character of the countryside and:
  - a. involves the re-use, conversion or extension of existing buildings at a scale appropriate to their location; or
  - b. is an essential requirement directly related to the economic or social needs of the rural community.

**1.1.1** East Wichel and parts of the Wichelstowe District Centre have been completed, but middle and west Wichel and the Wichelstowe employment land will be constructed in the period to 2036. The inset diagram below shows the disposition of land uses and infrastructure within the development.

### What has changed?

The reference to average density across the whole site is deleted as this is not capable of being applied in the determination of reserved matters planning applications.

The reference to affordable housing provision in accordance with policy is deleted as this doesn't need to be stated.

The reference to a requirement for a specific housing mix is deleted as the Council does not have a policy which requires a specific housing mix.

The reference to district heating is deleted as this will not now be taken forward because a feasibility study did not support its technical feasibility and financial viability.

The cross reference to Policy DE1 for development in the non-coalescence area is removed. This cross-reference is unnecessary, because DE1 applies to all development.

## 1.2 SA2 Kingsdown (East of A419)

### Policy SA 2

#### Kingsdown

1. Land at Kingsdown (East of the A419) is allocated for a new mixed-use development, as defined on the policies map.
2. The development shall provide:
  - a. a total of 1,650 dwellings;
  - b. affordable housing shall be provided in accordance with Policy DM15;
  - c. a mixed use Local Centre of not more than 1000m<sup>2</sup> retail floorspace with no more than 20% of that as comparison goods;



## 1 New Communities

- d. a 2 forms of entry primary school;
  - e. contributions towards the delivery of 2 forms-of-entry secondary school places off-site;
  - f. green infrastructure in accordance with Policies DM28 and DM31 which connects with Broad Blunsdon and the wider countryside;
  - g. landscape mitigation to reduce the visual impact of development to the north and east of the site;
  - h. sport, leisure, and community facilities;
  - i. high quality design and public realm in accord with Policies DM1 to DM4.
3. Following outline permission being granted, detailed design submissions including reserved matters applications should be guided by an overarching design approach that is set out through design codes.
4. Development at Kingsdown shall provide sustainable transport links that integrate with Swindon including:
  - a. a new all vehicular bridge across the A419 to connect to the Swindon urban area as the primary access route;
  - b. public transport links from the first phase of development mitigation contributions for the highway network;
  - c. vehicular access routes from Cold Harbour Junction and the B4019 east of Broad Blunsdon, designed in such a way to discourage additional trips through Broad Blunsdon and Broadbush and protect the amenity of Kingsdown Lane including appropriate green infrastructure to facilitate walking and cycling networks;
  - d. measures to minimise 'rat-running' through Broad Blunsdon village and from Cold Harbour Junction; and
  - e. connections for walking and cycling to Swindon and Broad Blunsdon.
5. Development at Kingsdown will protect, integrate and enhance existing assets including:
  - a. Bydemill Brook and its tributaries; and
  - b. Stratton Wood
6. Development at Kingsdown shall include mitigation to reduce the impact of development upon:
  - a. existing biodiversity and geodiversity assets;
  - b. the risk of flooding at new and existing communities;
  - c. the historic environment, including listed buildings and any archaeological features; and
  - d. the context and character of Broad Blunsdon at the northern edge of the site, through the design of the development.
7. The character and identity of Broad Blunsdon, including Broadbush, shall be protected by a principle of non-coalescence between the settlements. The masterplan should include and provide for a form of development that contributes towards the principles of green infrastructure. The land between the Kingsdown development and the village shall remain part of the countryside. However, small scale development within this area, as defined on the policies map, will be supported where it retains or enhances the existing character of the countryside and:

## 1 New Communities

- a. involves the re-use, conversion or extension of existing buildings at a scale appropriate to their location; or
  - b. is an essential requirement directly related to the economic or social needs of the rural community.
8. Management strategies will be required and agreed to secure the long term maintenance of infrastructure prior to development.

**1.2.1** The Kingsdown site was allocated in the Local Plan 2026 and is subject to a planning application. The primary access will be via a new bridge over the A419 linking into the Swindon urban area including walking and cycling. The vehicular bridge should be delivered early in the development. This may be secured through conditions relating to occupancy of residential units. Improvements to Cricklade Road shall be considered in the context of the proposed Kingsdown development and other developments.

**1.2.2** It is important that any impact on Broad Blunsdon is minimised and mitigated. The policy includes measures to reduce 'rat-running' and for the development to respect the context and character of the village. The area between the proposed development and Broad Blunsdon shall remain part of the countryside to maintain the separate identity of the village. A plan of the proposed development is shown below.

### What has changed?

Reference to a community approach to renewable energy is deleted.

The cross reference to Policy DE1 for development in the non-coalescence area is removed. This cross-reference is unnecessary, because DE1 applies to all development.

## 1.3 SA3 New Eastern Villages

### Policy SA 3

#### New Eastern Villages - Including Rowborough and South Marston Village Expansion

1. Land to the East of the A419, as defined on the policies map, is allocated for a mixed-use development. The form of the development shall comprise a series of new inter-connected distinct villages and an expanded South Marston village defined by the network of green infrastructure corridors.

#### Housing

2. The development shall provide a design led approach to housing density leading to an overall average density of 40 dwellings per hectare, comprising:
  - a. about 6,000 dwellings at the New Eastern Villages (south of the A420);
  - b. about 1,500 dwellings at Rowborough (north of the A420);
  - c. 500 dwellings at South Marston; and
  - d. affordable housing shall be provided at Rowborough and south of the A420 in accordance with Policy DM15.

### Transport

3. Sustainable transport measures shall include:
- walking and cycle network improvements that integrate with existing networks and provide good connectivity within the development and to the surrounding area;
  - the provision of public highway links, including the provision of a walking and bicycle network, to connect the Eastern Villages;
  - an integrated public transport route through the District Centre that connects the Eastern Villages to Swindon Town Centre, which includes residential development north of the A420, the District Centre and the employment allocation;
  - additional public transport services to connect with Swindon and internally within the development;
  - an improved gateway junction at White Hart to manage additional demand and deliver high quality public realm;
  - improvements to the Oxford Road/Drakes Way and Covingham Road/Dorcan Way transport corridors including public transport links to the town centre;
  - a bridge, known as Great Stall, across the A419 near Covingham Drive to provide for walking, cycling and public transport;
  - a new road link, known as the Southern Connector Road, to the Commonhead Roundabout;
  - a new road link under the Bristol to London railway line connecting the development north and south at Rowborough;
  - new and/or improved accesses to the A420 for proposed residential and employment uses;
  - a 1000 (3ha.) space Park and Ride site;
  - traffic calming measures to minimise rat-running through existing adjacent villages and east Swindon; and
  - management strategies will be required and agreed to secure the long term maintenance of infrastructure prior to development.

### Employment and Centres

4. The development shall deliver about 40 hectares net of employment land in total (B Class Uses) to be located south and east of the A420 and A419 respectively adjacent to the White Hart Junction, in a form that complements the mixed-use District Centre, and safeguards its connection with the wider residential development in the Eastern Villages and distributed as follows:
- 2.5 hectares within B1a use-class to be located at and/or adjacent to the District Centre;
  - 7.5 hectares. within B1b/c or B2 use-class; and 30 hectares within B8 use-class; and
  - about 12,000m<sup>2</sup> (gross) of retail floorspace including a high quality District Centre with strong connectivity to the adjacent residential areas, comprising an anchor food store and complementary uses, and a network of Local Centres that offer retail provision of a scale that meets the daily shopping needs of the communities they serve, including the existing community at South Marston.

### Community Facilities

5. The development shall deliver:

## 1 New Communities

- a. a minimum of 8 forms-of-entry of secondary provision;
- b. a minimum of 13 forms-of-entry of primary provision with early years facilities;
- c. community facilities including provision for educational learning facilities by the means of safeguarded land and/or developer contributions, including where appropriate, flexible, multi-purpose buildings for use by the community, the public sector and for worship at the District Centre and local centres;
- d. a health care facility with GP, dentist and pharmacy at the District Centre;
- e. a sewage treatment works if required; and
- f. sports and leisure facilities, including playing pitches a leisure centre and a 25m swimming pool; and
- g. management strategies will be required and agreed to secure the long term maintenance of infrastructure prior to development.
- h. safeguarded land for a fire station towards the southern part of the site.

### Design, Green Infrastructure and Public Realm

6. Following outline permission being granted, detailed design submissions including reserved matters applications should be guided by an overarching design approach that is set out through design codes.
7. The development shall provide:
  - a. an extensive green infrastructure network (this includes the provision of all typologies of public open space as set out in Policy DM31) that maximises opportunities for habitat connectivity and enhanced biodiversity including extending the River Cole green infrastructure corridor and connecting with Nightingale Wood;
  - b. in accord with the aims and objectives of the Great Western Community Forest (Policy DM29) to deliver a 30% net increase in tree cover within the development; and
  - c. High quality public realm, in accord with Policies DM1 to DM4, including outdoor civic public space and public art.

### Landscape and Biodiversity

8. The development will ensure that:
  - a. the landscape context and views to and from the North Wessex Downs AONB are respected, including potential off-site mitigation;
  - b. the risk of flooding from the development is minimised, both within the development and at existing neighbouring communities;
  - c. biodiversity, including the River Cole Corridor and River Cole Meadow County Wildlife Sites, is protected, integrated and enhanced; and
  - d. the historic environment, including the Scheduled Monument, Earls court Manor, Great Moorleaze Farm and other Listed Buildings are protected, acknowledged and enhanced.
9. The route for the Wilts & Berks Canal as set out on the policies map will be safeguarded and protected from development.
10. The character and identity of Wanborough, Bishopstone and Bourton will be protected by a principle of non-coalescence between the settlements. The land between the New Eastern Villages site boundary and the existing villages shall remain part of the countryside. However, small scale development within this area, as defined on the policies map, will be permitted where it retains or enhances the existing character of the countryside and:

- a. involves the re-use, conversion or extension of existing buildings at a scale appropriate to their location; or
- b. is an essential requirement directly related to the economic or social needs of the rural community.

### **South Marston Village Expansion**

- 12. Development at South Marston shall be in accordance with the South Marston Neighbourhood Plan and must contribute towards the creation of an integrated village with a distinct rural and separate identity from Swindon and other settlements. Expansion of the village will be as part of the New Eastern Villages strategic allocation and through allocated brownfield opportunities, as shown on the Policies Map.
- 13. Development at South Marston shall:
- 14.
  - a. ensure it respects the character of the existing village by:
    - i. providing housing at an average of 30 dwellings per hectare;
    - ii. providing affordable housing in accordance with Policy DM15, but at a proportion of no more than 20%; and
    - iii. following outline permission being granted, detailed design submissions including reserved matters applications should be guided by an overarching design approach that is set out through design codes.
  - b. provide community, recreation facilities and retail provision of an appropriate scale, as part of a village centre;
  - c. provide green infrastructure in accordance with Policies DM28 and DM31 proportionate to the scale of expansion;
  - d. provide an extended recreation ground to include the field to the south-west of the current recreation ground with recreational facilities of an appropriate type and scale;
  - e. protect historical landscape features, archaeological assets and existing green-infrastructure;
  - f. deliver primary school places within the village to meet the needs of an expanded South Marston;
  - g. provide a new road connection between Thornhill Road and Old Vicarage Lane, which should be positively integrated within the limits of the expanded village;
  - h. provide traffic management and sustainable transport measures to minimise the volume of traffic, including traffic passing through the village, and to reduce the impact on the village, in particular at Pound Corner;
  - i. ensure other development/redevelopment opportunities on existing (brownfield) sites in the west and north of the village provide strong links with the village and make the appropriate infrastructure contributions to mitigate their impact;
  - j. provide mitigation measures to protect the village from flood risk in accord with Policy DM34; and

## 1 New Communities

- k. where possible realise opportunities to facilitate main drainage and utilities supply to existing properties that currently lack connections; and
- l. no new development shall be served from Nightingale Lane or Rowborough Lane and traffic measures will be implemented to deter extraneous traffic from using these routes.

### Protection of existing villages

1. The character and identity of Wanborough, South Marston, Bishopstone and Bourton will be protected by a principle of non-coalescence between the settlements, as defined on the Policies Map. The land between the New Eastern Villages site boundary and the existing villages shall remain part of the countryside. To ensure non-coalescence of South Marston with Swindon and the New Eastern Villages, the land between the expanded village and the railway to the south shall remain part of the countryside. Development within this area, as defined on the Policies Map, shall only be permitted where it retains or enhances the existing character of the countryside and
  - a. involves the re-use, conversion or extension of existing buildings at a scale appropriate to their location; or
  - b. is an essential requirement directly related to the economic or social needs of the rural community.

**1.3.1** The New Eastern Villages was allocated in the Local Plan 2026 and is subject to several planning applications. [reasoned justification text that incorporates additional policy requirements should be moved into the policy].

### What has changed?

As the policy is long, sub-headings are introduced and the paragraphs grouped by theme for ease of reference. Clarity has been added around the protection of existing villages.

Primary education provision has been changed from 8 forms-of-entry to 13 forms-of-entry to reflect the Council's updated position.

The cross-reference to Policy DE1 for development in the non-coalescence area is removed. This cross-reference is unnecessary because DE1 (now DM1) applies to all development.







## 2 Local Site Allocations

## 2 Local Site Allocations

### 2.1 Central Swindon

#### Policy LA 1

##### Kimmerfields

Kimmerfields, as shown on the policies map, is allocated for developed as a mixed use office, residential and leisure quarter. Development proposals, whether delivered individually or comprehensively, are required to comply with the following principles:

- a. A new pedestrian and bicycle link shall be provided between Fleming Way and Wellington Street.
- b. A new green focal public space shall be provided at the western edge of the site.
- c. Tree planting shall be provided along the site's Fleming Way edge.
- d. A two-way bicycle track shall be provided along Fleming Way built to the standards in the London Cycling Design Standards.
- e. The development shall re-establish a street-based layout and rectilinear block structure which makes connections with surrounding streets.
- f. Residential uses shall predominate at the north east of the site adjacent to the residential area of Broadgreen.
- g. Building heights at the north east corner fronting Manchester Road and Corporation Street shall not exceed 4 storeys to achieve a satisfactory relationship with Victorian/Edwardian residential properties on Manchester Road and Corporation Street. Additionally, sufficient set-back should be provided from these streets to ensure that the development does not result in a deterioration of air quality through the creation of a street canyon.
- h. Building heights of up to 8 storeys are appropriate on the site's Fleming Way edge and on its edge with the Tri Centre, although the impact of such buildings on overshadowing within the site should be carefully considered. Tall buildings above 8 storeys on the Kimmerfields site are not supported.
- i. Development should employ durable high-grade materials, and restrained, simple architectural form and expression which emphasises quality and a sense of place.
- j. The mix of housing provided shall include housing suitable for families.
- k. Car parking shall not dominate streets or communal areas as this would detract from place making. On street parking will be considered appropriate but must not undermine the permeability and legibility of the development for pedestrians. Ground floor under-croft parking is not considered an appropriate solution for widespread use across the scheme unless it is 'wrapped' in active ground floor uses.

**2.1.1** Kimmerfields, formerly known as Union Square, is the flagship redevelopment site in central Swindon. The site is owned by Swindon Borough Council and Homes England. The proposed policy sets some basic design parameters that are sought by the local planning authority and are intended to guide future proposals for the development of the site.

#### What has changed?

This is a new policy.



## 2 Local Site Allocations

### Policy LA 2

#### North Star

North Star, as shown on the policies map, is allocated for the development of a new regional leisure facility. Development proposals, whether delivered individually or comprehensively, are required to comply with the following principles:

- a. The development of North Star shall be comprehensively masterplanned.
- b. Improved pedestrian and bicycle links from the north of the railway line to Swindon Railway Station and the core of the town centre shall be provided.
- c. Comparison retail provision shall be limited and should be focussed on specialist sport retail to avoid undermining the Primary Shopping Area. Similarly, the level of food and beverage offer should not undermine the Primary Shopping Area.
- d. The priority is to create an environment with an urban character comprising a coherent urban structure of streets and spaces defined by buildings rather than a retail-park type environment structured around surface car parking.
- e. The provision of residential uses within the development is supported.
- f. In light of the area's lack of an established prevailing character, heritage assets, or sensitive neighbouring uses, North Star is considered to be an appropriate location for taller buildings. However, care should be taken in considering the impact of such buildings on the street level environment to avoid overshadowing or the creation of canyons.
- g. The mix of housing provided shall include housing suitable for families.

**2.1.2** North Star is an important development site in central Swindon. The proposed policy sets out parameters that the Council will expect development of the site to meet.

#### What has changed?

This is a new proposed policy

### Policy LA 3

#### Swindon Railway Station

Redevelopment of the Swindon Railway Station and its adjacent car parks, as shown on the policies map, is supported. Development proposals, whether delivered individually or comprehensively, are required to comply with the following principles:

- a. Comparison retail shall be of a scale and type to serve the needs of station users to avoid undermining the role of the Primary Shopping Area.
- b. The creation of a significant food and beverage cluster is also not supported in this location because of its potential to detract from the function of Old Town and the Primary Shopping Area. Food and beverage uses should be limited to the scale and type appropriate to serve station users.
- c. Development should create an additional public pedestrian link across the railway line from north to south.
- d. The provision of office and residential uses as part of the redevelopment will be supported.

## 2 Local Site Allocations

- e. Development should create a new landmark principal station façade to Station Road. A new landmark façade would help reflect the importance of the railway to Swindon's history. Modern, innovative or daring design will be supported.
- f. The quantum of car parking provided on surface should be reduced and re-provided in a multi-storey car park, to enable a more efficient use of space and support the creation of a more urban character.

**2.1.3** Land around Swindon railway station is predominantly occupied by surface car parking and this lends the station a 'parkway' character that is not consistent with its town centre location. There are clear opportunities to intensify the use of land around the station and deliver an upgraded station which reflect the railway's prominence in Swindon's history, and the high level of use of the station (with 3,679,242 entries and exits in 2017 and electrification likely to support further passenger numbers growth).

### What has changed?

This is a new policy.

### Policy LA 4

#### Cultural Quarter

1. The renovation, remodelling and/or redevelopment of land indicated on the policies map as a cultural quarter is proposed to accommodate expanded theatre capacity, a new home for Swindon's museum and art gallery, dwellings, food and beverage uses, and workspaces.
2. Development of the cultural quarter shall:
  - a. Improve the legibility of pedestrian routes between Regent Street and the proposed cultural facilities.
  - b. Provide a solution to resolve the unattractive level change between the Wyvern Theatre and its car park to its north to create better north-south pedestrian permeability.
  - c. Comprise high-quality, contextually appropriate new or redeveloped buildings.
  - d. Retain visually important trees and supplement them with additional tree planting on the Princes Street frontage.
  - e. Support the creation of a high-quality, family friendly night time economy cluster in this location, in accordance with Policy DM12.

**2.1.4** Aspirations to develop improved cultural facilities on the site of the current Wyvern Theatre car park date back to a Casson, Conder and Partners 1965 proposal for a civic centre incorporating a 2,000 seat auditorium. More recently 'The Promenade' cultural quarter was promoted through the Swindon Central Area Action Plan (2009), Cultural Quarter SPD (2006) and Swindon Borough Local Plan 2026 (2015). There is a widespread feeling that Swindon's cultural facilities have not kept up with the development of the town in other areas and improving cultural facilities in the town is seen as a central component of efforts to regenerate the town's central area. In particular, the town is

## 2 Local Site Allocations

unable to display its Swindon Collection of modern art due to inadequate facilities at the existing town museum and art gallery. Similarly, The Wyvern Theatre lacks capacity to attract higher profile touring shows and performances.

### What has changed?

This is a new policy.

## 2.2 Rest of the Borough

### Policy LA 5

#### Hospital Expansion Land

5.5 hectares of land adjoining the Great Western Hospital, as shown on the policies map, is safeguarded for future expansion of the Great Western Hospital, incorporating provision for emergency services if required.

**2.2.1** The Great Western Hospital NHS Foundation Trust and Great Western Hospital have identified that there is a need for land adjacent to the hospital to be safeguarded to accommodate future growth needs. The need to safeguard this land remains, despite the fact that the adjacent Badbury Park housing development (a site allocation under the Swindon Borough Local Plan 2026) is nearing completion.

### What has changed?

This is a new policy. It retains the safeguarding of land for hospital expansion which was included in Local Plan 2026 Policy NC2.

### Policy LA 6

#### The Old Town Hall and Corn Exchange

Redevelopment of the Old Town Hall and Corn Exchange and adjacent land, as shown on the policies map, are supported. Development proposals, whether delivered individually or comprehensively, are required to comply with the following principles:

- a. The retention and restoration of the remaining external walls of the listed Market Hall and Old Town Hall is required, but restoration of the internal fabric of the buildings is not required and there is flexibility over treatment of the internal spaces.
- b. Market square should be pedestrianised as a public space.
- c. A new building at the 'head of the square' of 3-4 storeys would be appropriate to enclose the market square at its eastern end.
- d. The remaining external stone walls of the historic Butter Market should be conservatively repaired, but flexibility exists in the treatment of spaces and internal details.

## 2 Local Site Allocations

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- e. Building heights should respond to the prevailing character of the area which comprises 3-4 storey buildings.
- f. In view of parking pressures in Old Town, the Council will seek a parking ratio of 1:1 for residential units and will require access to be provided for the servicing of commercial units.

**2.2.2** The Old Town Hall and Corn Exchange is an important redevelopment site which provides an opportunity to restore important Swindon landmarks into active use. The policy provides some parameters that the Council will expect redevelopment of this site to meet.

### What has changed?

This is a new policy.







## 3 Development Management Policies

### 3 Development Management Policies

#### 3.1 Design

##### Policy DM 1

###### Place Making Principles

All new development must be of high quality and contribute to a strong sense of place by meeting the following principles:

- a. Prioritise pedestrians to create walkable environments and ensure that car parking does not dominate.
- b. Minimise opportunities for and the fear of crime through layouts which provide active frontages and passive surveillance.
- c. Take opportunities for sustainable design and energy efficiency through passive solar design and efficient layouts which minimise the amount of land used for development.
- d. Protect the amenity of users of existing and proposed buildings and spaces including daylight and sunlight levels, privacy and outlook.
- e. Create high quality, attractive, functional private external areas and public realm and secure arrangements for their long term maintenance. Take opportunities to green the area by including landscaping, sustainable drainage and street tree planting.
- f. Respect the local natural, built and historic character unless a change or different response is justified and would contribute to creating a positive local character.
- g. Make convenient, direct, attractive and understandable physical and visual connections with adjacent areas. Create permeable places with interconnected street layouts that are easy to move around and understand.

**3.1.1** The council has set a vision for Swindon which seeks to ensure: ...[Swindon] will be physically transformed with existing heritage and landmarks complimented by new ones that people who live, work and visit here will recognise and admire. To help fulfil this and in line with paragraph 9 of the NPPF the Local Planning Authority has formulated local design policies. These seek to protect and enhance our town and secure high quality development to realise our vision for change and our placemaking ambition". The policy outlines principles applicable to all developments for how this can be achieved.

##### Policy DM 2

###### Design of Buildings

1. All buildings must comprise high quality, well functioning, visually attractive architecture.
2. All buildings shall:
  - a. use high quality, durable materials and detailing with elevations, building forms and compositions that are harmonious;
  - b. orientate active frontages to face or enhance the public realm;
  - c. use strong landscaping and boundary treatments to define the private - public interface;
  - d. provide attractive, spacious, legible and accessible main entrances;
  - e. provide the necessary storage and servicing for the building, in a convenient and accessible location, without compromising the visual appearance of the building or

### 3 Development Management Policies

the public realm. The location of refuse and recycling storage should consider collection requirements. It should be easily accessible from the public highway and achieve the minimum carry-distances as required by the Local Highway Authority Standards<sup>(1)</sup>;

- f. respect the context and local character by complementing and reinforcing existing attractive attributes or by setting a new higher standard of contemporary design; and
- g. be of an appropriate scale to other buildings in their vicinity in terms of height and massing unless a building of greater scale is justified by the location, function and importance of the building.

3. Tall buildings<sup>(2)</sup> shall:

- a. contribute positively to the overall townscape through high architectural quality;
- b. have an appropriate relationship with neighbouring buildings;
- c. protect important views;
- d. avoid overshadowing public spaces or creating tunnels or microclimatic effects; and
- e. are encouraged to be scrutinised by design review.

4. Extensions must be sensitive to the host building and local character in terms of existing architectural elements, materials, proportion, roof shape, scale, patterns of openings, and detailing.

**3.1.2** The objective of this policy is to ensure that all new development is of a high standard of design. The revised National Planning Policy Framework provides a greater emphasis on design, with links to health and wellbeing and accessibility. There is also a greater focus on clearly articulated design policies and stronger wording on the use of design review panels. The policy therefore expands on the previous principles of Policy DE1 to provide more detailed criteria to be considered when assessing all new development proposals. More detailed guidance for new residential developments can be found in the Swindon Residential Design Guide SPD.

#### Policy DM 3

##### Design in Larger Developments

1. Developments which create new neighbourhoods must be preceded by a framework for creating distinctive places. This will, as a minimum, include the submission of an overarching masterplan and more detailed design codes for the development or subsections/phases thereof. Placemaking frameworks, masterplans and design codes will be encouraged to be assessed by design review.
2. Such development must also:
  - a. ensure a coordinated and comprehensive development of the wider development area;
  - b. ensure there are no gaps or ransom strips between the development and adjacent areas that would compromise connectivity;
  - c. create a spatial structure using legible elements to define and shape the whole development;

1 The Local Highway Authority standards are that the refuse collection vehicle needs to be able to get within 10m of the bin collection point. Routes to bin collection points should be no more than 30m and in accordance with the Approved Document to Part H of the Building Regulations and Manual for Streets.

2 means any building that is more than 50% taller than the prevailing height of surrounding buildings

## 3 Development Management Policies

- d. include an interconnected, permeable street pattern with block lengths usually not exceeding 100m; and
- e. use street typologies that achieve strong edges and create street cross-sections that provide enclosure appropriate to the scale of the movement routes.

**3.1.3** The policy applies to developments that create new neighbourhoods comprising streets, public space and multiple buildings. These include the new communities. In the case of residential developments, such developments will usually comprise 20 or more dwellings. Larger developments are central to the Borough's development strategy. The policy seeks to ensure that larger developments in the Borough are well planned, come forward comprehensively, and that design quality is maintained throughout the development.

### What has changed?

We propose to replace existing policies DE1 and DE2 with three new policies. The new policies expand Policy DE1 to provide more detailed policy guidance. This reflects the emphasis placed on design and character in the revised NPPF.

### Policy DM 4

#### Inclusive Design

1. Development proposals will be supported which:
  - a. achieve high standards of inclusive design;
  - b. are fully accessible to everyone and can be entered, exited, used and navigated independently, safely and easily by everyone; and
  - c. have no disabling barriers to separate or require special treatment for those with impaired mobility or disability.
2. Development proposals should provide an inclusive design statement within the Design and Access Statement which demonstrates how inclusive design and accessibility have been addressed in order to meet the above principles.

**3.1.4** As our population ages, the proportions of people living with a disability will increase. The Council aims to ensure residents can live in their own homes as long as possible. However, for people to live independently they must be able to access the employment, leisure, medical and social places that they require. Conversely an inaccessible built environment can restrict the lives of disabled people and force them to rely unnecessarily on assistance from others.

**3.1.5** The Local Plan 2026 sought to address inclusivity and accessibility through a general policy on design, including them within a wide range of design principles. However, it is proposed to incorporate a separate policy that specifically addresses inclusive design and access, in order to provide a broader and stronger policy approach.

## 3 Development Management Policies

### What has changed?

This is a new policy.

### 3.2 Economy

**3.2.1** The Employment Land Review 2017 documents that between 2001 and 2011 censuses Swindon Borough moved from being a net importer to a net exporter of labour as employment growth did not keep up with the expansion of housing. This pattern is expected to have intensified in the period since 2011. This is an important spatial planning issue the plan review must seek to address. The evidence of Swindon's lack of availability of employment land of all types to meet demand supports a continued robust approach to the protection of employment land alongside efforts to deliver new employment locations.

#### Policy DM 5

##### Core Employment Sites

1. Within the Core Employment Sites identified on the policies map, the creation of or expansion of buildings in B1b, B1c, B2 and B8 uses and employment generating sui-generis uses will be supported. B1(a) office developments of 1,000m<sup>2</sup> in gross floor area or under will be supported. Above this size threshold, Policy DM7 will apply.
2. Applications for uses outside of the categories listed in paragraph a. will not be supported unless there is an exceptional justification.
3. Sites allocated in the plan for employment development will be afforded the same level of protection as Core Employment Sites unless there is shown to be no reasonable prospect of the allocated development coming forward.

##### Core Employment Site Locations

Honda, BMW, Windmill Hill, Keypoint, G Park, South Marston Park, DB Symmetry Park, Blagrove/Euroway, Pipers Way (Intel and Nationwide), Kembrey Business Park, Iceland Distribution Centre.

**3.2.2** Swindon has a strong industrial market and this is a strength of the Borough's economy. Protecting the Borough's highest quality employment sites - as evidenced in the Employment Land Review 2017 - from changes of use that might erode their attractiveness to occupiers is important for the future competitiveness of the Borough. The policy supports the expansion of and seeks to resist loss of employment uses at these 'crown jewel' employment sites.

**3.2.3** Swindon's town centre is not listed as a core employment site because, following expansions of the Town and Country Planning (General Permitted Development) Order 2015, local authorities have little ability to restrict changes of use of office buildings.

### What has changed?

Local Plan 2026 policy EC2 is split into three policies, reflecting a proposed two tier approach to the protection of employment land, with a third separate policy on the location of new office development.

### 3 Development Management Policies

The changes seek to restrict the loss of the best employment land to other uses.

#### Policy DM 6

##### Employment Land

Maintaining a portfolio of available employment land is necessary to allow local businesses to expand and attract new businesses to the Borough. Therefore, subject to Policy DM8 (Retail and Leisure on Employment Land), outside of the Core Employment Sites change of use of Employment Land shown on the policies map to non-employment uses will only be supported where:

- a. the proposed development would not adversely impact on the regeneration of Swindon Town Centre; and
- b. the site is no longer attractive as an employment location. To demonstrate this the site must be actively marketed for a minimum of two years at a price which accords with other property of a similar type in the area; and
- c. the proposed non-employment use would not harm the employment function or attractiveness to employment occupiers of neighbouring employment land or the wider employment area; and
- d. it would not be viable to re-develop the land for employment uses.

**3.2.4** The policy provides a criteria-based approach for considering proposals for the change of use of employment land outside of the Core Employment Sites. The latest evidence in the Employment Land Review 2017 records that the level of available industrial space in the Borough has not kept up with continually strong levels of occupier demand. It therefore recommends that the protection of employment land from loss to other uses is retained in order to reduce the risks that industrial occupiers are displaced from the Borough because of a lack of alternatives.

#### What has changed?

Current policy EC2 is split into three policies, reflecting a proposed two tier approach to the protection of employment land, with a third policy on the location of office development.

The changes seek to restrict the loss of the best employment land to other uses.

The requirement for marketing evidence to support an argument that a site is no longer attractive as an employment location is extended from 6 months to 2 years to reflect realistic time-frames for business relocations.



## 3 Development Management Policies

### Policy DM 7

#### Office Development

Office developments should be focused on the Kimmerfields site or other sites in Swindon Town Centre and the allocated employment land within the new communities. Proposed office developments of in excess of 1,000m<sup>2</sup> in gross floor area outside of Swindon Town Centre, the New Eastern Villages District Centre or the Wichelstowe employment land will only be permitted if:

- a. the proposed development would not have an adverse effect upon:
  - i. the regeneration of Swindon Town Centre; and
  - ii. committed, planned or proposed public and private investment in Swindon Town Centre or other defined centre; and
  - iii. the vitality and viability of Swindon Town Centre or other defined centre; and
- b. there are no sequentially preferable sites available within Swindon Town Centre, at the New Eastern Villages District Centre, on the Wichelstowe employment land or - if sites at these locations are not suitable and available - on the edge of Swindon Town Centre, and
- c. the development would have a good standard of access by a choice of modes of transport, including high frequency public transport (they should lie within 400m of a public transport stop with a minimum of 2 services per hour weekday day time), bicycle and foot, and by people with disabilities.

**3.2.5** This policy outlines the Council's approach to the location of office development. The review of the plan retains a local threshold of 1,000m<sup>2</sup> of gross floor space above which an impact and sequential assessment will be required. The local threshold is set below the national threshold in view of the acknowledged weakness and lack of high quality office accommodation in Swindon town centre and the importance of delivering office accommodation there and at the allocated employment land at the New Eastern Villages and Wichelstowe, as set out in the Employment Land Review (2017). This threshold will allow the Council to assess the impacts on these centres of out-of-centre office schemes above the threshold.

**3.2.6** Local policy continues to depart from national policy in not requiring a 'town centre first' sequential approach for offices below 1,000m<sup>2</sup> in gross floor space. While it is considered important that large-scale office proposals above the threshold are directed to the town centre and allocated employment sites to support the delivery of the office stock the Borough needs, the policy also recognises that office space in Swindon Borough is very dispersed. The Employment Land Review 2017 supports the need for further out-of-town offices and this policy supports the delivery of smaller and mid-sized offices across the Borough.

**3.2.7** Planning applications which are required to undertake a sequential test should be supported by a sequential site assessment, the scope of which should be agreed in pre-application discussions with the local planning authority.

#### What has changed?

New reference is added to Kimmerfields, the edge of Swindon Town Centre, and to the Wichelstowe employment land as specific sequentially preferable locations for offices. In addition, the policy on accessibility is expanded to define what a good standard of access means in the context of Swindon Borough.

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### Policy DM 8

#### Retail and Leisure on Employment Land

Planning permission will be refused for A-use class (shops, financial and professional services provided principally to visiting members of the public, restaurants and cafes, drinking establishments, and hot food takeaways) development and Class D2 (assembly and leisure) development on Employment Land shown on the policies map unless the proposed use is either:

- a. ancillary to on-site production or storage; or
- b. a car showroom, vehicle repairs garage or other car-related retail use.

**3.2.8** The Borough has seen recent high-profile losses of employment land to retail. For example at Swindon Gateway North and at Blackworth in Highworth. Other employment sites, such as Drakes Way and Bridgemoor, have seen their industrial character eroded by conversions to A uses and D2 uses. The proliferation of retail and leisure uses on employment land in turn contributes to weakening Swindon's town centre and district centres. The policy seeks to restrict this trend to preserve the attractiveness of Swindon's industrial locations to industrial and distribution occupiers.

**3.2.9** 'Car-related retail' refers to the retail of car parts. It does not include 'drive thru' food and beverage uses.

**3.2.10** 'Ancillary' means a subsidiary or secondary use or operation closely associated with the main use of a building or piece of land.

#### What has changed?

This is a new proposed policy.

### 3.3 Town, District and Local Centres

### Policy DM 9

#### Centres and Main Town Centre Uses (Excluding Offices)

1. Planning applications for main town centre uses<sup>(3)</sup> should be located in defined centres identified on the policies map and listed below, should be consistent with the role of the centre in which they are located and should not compromise the health of other centres.
2. Subject to paragraph 3 of this policy, applications for main town centre uses (including proposals for the subdivision, expansion or removal of restrictions on existing units) outside of the boundaries of the defined centres will not be permitted unless:

3 Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).



### 3 Development Management Policies

- a. they satisfy the sequential test set out in national planning policy. The sequential test will be applied using the hierarchy of defined centres set out in this policy with priority given to higher tier centres. In applying the sequential test, flexibility on store format and (where the proposal comprises more than one unit) disaggregation shall be shown, and
  - b. they would have a good standard of access by a choice of modes of transport, including high frequency public transport (they should lie within 400m of a public transport stop with a minimum of 3 services per hour weekday day times), bicycle and foot, and by people with disabilities, and
  - c. where a proposed development, including proposals for the expansion of existing units, would result in an increase in floor area in excess of 600m<sup>2</sup>, it would not have an adverse impact upon:
    - i. the regeneration of Swindon Town Centre;
    - ii. committed, planned or proposed public and private investment in Swindon Town Centre or another defined centre; or
    - iii. the vitality and viability of the Swindon Primary Shopping Area or another defined centre.
3. Proposals for small, single convenience shop units (A1-Use Class) of no greater than 250sqm in gross floor area will be permitted within settlement boundaries where they provide only for the daily shopping needs of the local population and are within walking distance of the community they serve.
  4. In villages, outside of the Swindon Primary Urban Area, but not including Highworth and Wroughton, small-scale sites for single units in main town centre use with no greater than 100m<sup>2</sup> in tradeable floor area will be permitted on sites in accessible locations within the rural settlement boundary.

Hierarchy of centres	Role
<b>Regional Centre:</b>	The Swindon Primary Shopping Area will be the principal location for additional comparison shopping floor space.
Swindon Primary Shopping Area	
Swindon Town Centre	Swindon Town Centre will be the main focus for expansion of main town centre uses in the Borough.
<b>District and Primary Rural Centres:</b>	These centres provide convenience and comparison shopping and some higher tier services and facilities (such as libraries) to a district, small town or village catchment. Levels of retail and food and beverage floor space growth should be appropriate to the size and function of the centre and should not detract from the regional role of Swindon Primary Shopping Area. The edge of district centres is not a sequentially preferable location.
Old Town District Centre	
West Swindon District Centre	
Cavendish Square District Centre	
Gorse Hill District Centre	

### 3 Development Management Policies

Orbital Shopping Park District Centre	
Highworth Primary Rural Centre	
Wroughton Primary Rural Centre	
Wichelstowe District Centre	
New Eastern Villages District Centre	
<b>Local Centres:</b> As shown on the Policies Map	These centres provide shops and services of a local nature, serving a small neighbourhood catchment. Within local centres comparison retail and food and beverage uses will be acceptable in line with the size of the centre and provided that the proposal is aimed at catering for the local catchment population.

**3.3.1** In accordance with national policy, the policy defines a hierarchy of centres<sup>(4)</sup>. The role of each tier of centre is defined in the policy and a primary shopping area is defined.

**3.3.2** The policy reflects national policy in its sequential and impact tests. However, in light of Swindon Town Centre's continued weakness and ongoing efforts for its regeneration, together with efforts to improve and protect primary rural centres at Wroughton and Highworth:

- a locally-specific test of 'adverse impact' rather than 'significant adverse impact' is used in applying the impact test; and
- a 600m<sup>2</sup> threshold for impact assessment is used; and
- an additional, Swindon Borough-specific, test that development should not harm the regeneration of Swindon Town Centre is included.

**3.3.3** In applying the sequential test, where a proposal comprises more than one unit, the policy requires the ability of individual units to be disaggregated and accommodated within centres to be considered. Not considering disaggregation in such circumstances would make it easier for a large out of town scheme comprising multiple units to pass the sequential test than a proposal for a single out of town unit. This outcome would defeat the purpose of the policy by favouring larger out of town developments.

**3.3.4** In considering flexibility over store format, commercial preferences for proximity to large amounts of free car parking or for the lower rents offered by out-of-town units will not be considered to be valid reasons for rejecting otherwise suitable and available units within centres.

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4 supported by the Swindon Borough Retail and Leisure Needs Assessment 2017



### 3 Development Management Policies

#### What has changed?

Local Plan 2026 Policy EC3 is split into two policies, one on the location of main town centre uses (excluding offices) and the other on land uses within town, district and local centres.

The policy on the location of main town centre uses is similar in format to the current policy, but seeks to define in greater detail some things that the current policy does not make clear:

- What is the intended role of the town, district and local centres?
- What is the maximum size for small scale convenience retail to serve the daily shopping needs for the local community (which are an exception to town centre first)?

There are also some new paragraphs:

- In accordance with national policy's support for small rural main town centre uses (NPPF paragraphs 73 and 88) a paragraph that seeks to support small scale main town centre uses at villages.
- A paragraph that, consistent with national policy, makes accessibility a criteria in assessing out-of-centre proposals for main town centre uses and provides accessibility standards.

#### Policy DM 10

##### Land Uses Within Centres

1. Within primary frontages shown on the policies map planning permission will not be granted unless:
  - a. It will retain or provide continuous ground floor A1, A2, A3 or other main town centre use (excluding office), and
  - b. It will retain or provide a shopfront with a display function that is directly accessible to the public from the street.
2. Elsewhere within the Swindon Primary Shopping Area, District and Primary Rural centres, planning applications will not be permitted unless they maintain frontages with active visual engagement between the street and the ground floor of buildings. This requires continuous street frontages with shallow setbacks from the street, and regular entrances and ground floor windows.
3. Subject to Policy DM27 (policy on community facilities), planning permission will be granted for non-A1 retail uses in Local Centres if:

## 3 Development Management Policies

- a. at least one general convenience store will remain in the centre, and
  - b. the proposed use would not adversely affect the amenity of neighbouring properties or the surrounding area.
4. Within centres street trading will be permitted where it satisfies other development management policies, and is in accordance with the adopted Street Trading & Ancillary Retail Kiosks Development Management Guidance Note.

**3.3.5** Shopping and town centres are changing nationally, and Swindon Borough is no exception. Evidence locally and nationally and consultation with local stakeholders<sup>(5)</sup> supports the need to diversify the range of land uses within our centres to support their vitality and ability to compete with online and out-of-town options. A more flexible planning approach supports the ability of centres to respond to changing consumer preferences and shopping patterns.

**3.3.6** In accordance with national policy, primary frontages and a primary shopping area are defined. These will be the focus for main town centre uses. Elsewhere within our centres, a more flexible approach is adopted which emphasises maintaining active building frontages rather than seeking to restrict buildings to particular land uses. In our local centres, the policy focuses on maintaining a general convenience store for the local community, protecting community facilities and residential amenity.

### What has changed?

This policy reflects a proposed new approach to land uses within town centres. We know from local and national evidence that the most successful centres are those that support a diversity of activities and land uses. Our view is that planning policy should support that diversification while ensuring that the main frontages within our centres are in use for main town centre uses such as shops, cafes, restaurants, services like banks and estate agents, or leisure and community uses.

Outside of the primary frontages, we feel that ensuring buildings provide active frontages to the street is more important than seeking to specify land uses. This new approach will allow ground floor offices and residential uses in these parts of the centres. We have amended the town centre primary frontages, for example Bridge Street is now excluded.

We have re-drawn some of the centres on the policies map to take into account changes in land use since the map was last produced and to adopt a consistent approach to how we draw the boundaries. We have removed the Broadgreen Local Centre designation as the further growth of this centre could undermine the residential character of the area.

5 See Swindon Borough Council Local Plan Review Main Centre Uses (Excluding Retail) Topic Paper



## 3 Development Management Policies

### Policy DM 11

#### Hot Food Takeaways, Drinking Establishments, Betting Offices and Payday Loan Shops

1. Planning applications for hot food takeaways, drinking establishments, betting offices, adult gaming centres and payday loan shops will not be supported if:
  - a. they would cause a harmful cumulative impact on the vitality and viability of the defined centre or frontage in which they are located, taking into account the number and distribution of existing such uses and non-implemented planning permissions; or
  - b. in the case of hot food takeaways and drinking establishments, they would lead to or exacerbate issues of crime and anti-social behaviour, including littering.
2. Hot food takeaways (including street trading units) will not be permitted within 400 metres' walking distance of an existing or proposed primary or secondary school entrance, unless the proposed takeaway is within a defined retail centre, as defined in Policy DM9.

**3.3.7** Some areas of the Borough have seen the development of increased concentrations of hot food takeaway uses, drinking establishments, betting offices and payday loan shops. Concentrations of these uses have been linked to adult and childhood obesity (in the case of hot food takeaways <sup>(6)</sup>), to anti-social behaviour and to the decline in the vitality of and footfall within centres. The policy allows the Council in determining planning applications to take account of the cumulative impact of concentrations of these uses.

#### What has changed?

This is a new policy.

### Policy DM 12

#### Supporting the Night Time Economy

1. Expansion of the night-time economy shall be focussed on the Regent Circus Night-Time Economy Cluster as identified in the policies map. Within this area, proposals for night time economy uses including restaurants, cafes, bars, cultural and music venues will, subject to policy DM11 (policy on Hot Food Takeaways, Drinking Establishments, Betting Offices and Payday Loan Shops), be supported.
2. Within Old Town District Centre planning applications for night time economy uses should not lead cumulatively to such a proliferation of night time uses as to undermine the district centre's daytime role.
3. The 'agent of change' principle in national planning policy will be applied to planning applications that would potentially impact upon the operation of public houses or night time economy venues.

6 see Swindon Borough Council Local Plan Review Hot Food Takeaway Topic Paper

## 3 Development Management Policies

**3.3.8** A successful and diverse night time economy is an important aspect of successful town centres. The Council will use its planning and licensing powers to support the development of a diverse, family-friendly night time economy in the right locations as part of Swindon town centre's regeneration. The policy supports the expansion of high quality night time economy uses around the existing restaurant cluster at Regent Circus, the Regent Circus Cinema, MECA and Wyvern Theatre venues. In Old Town the objective will be to manage and restrict further growth of the night time economy to protect the area's district centre function and residential environment.

**3.3.9** The 'agent of change' principle is set out in paragraph 182 of the NPPF 2019.

**3.3.10** Night time economy venues will be protected in accordance with Policy DM27 (policy on community facilities).

### What has changed?

This is a new policy.

## 3.4 Housing

### Policy DM 13

#### Residential Standards

1. All residential development including extensions must meet the Nationally Described Space Standards.
2. Apartments must also:
  - a. include natural ventilation by, where possible, avoiding single-aspect units. Where included, single aspect units may only be east, west or south-facing and must include additional mitigating measures such as projecting or inset balconies;
  - b. avoid long internal corridors with no natural light, and ensure each core serves no more than 8 units per floor;
  - c. have access to private external space of at least 10m<sup>2</sup> per apartment (5m<sup>2</sup> in the Town Centre). This may be provided as either private balcony space or shared amenity gardens or both. The minimum depth and width for all balconies and other private external spaces is 1500mm.

**3.4.1** The policy proposed adoption the Nationally Described Space Standards. In the Written Ministerial Statement of March 2015<sup>(7)</sup>, the Government gave Local Authorities the option to set technical standards for new housing, which are additional technical requirements exceeding the minimum standards required by building regulations. One of these optional standards is the Nationally Described Space Standard (NDSS)<sup>(8)</sup>.

**3.4.2** Residential development should provide an acceptable level of internal and external amenity for all types of dwellings in order to protect future users and contribute to sustaining populations within their communities over the long term. The Nationally Described Space Standards sets out requirements

7 Written Statement to Parliament: Planning Update march 2015

8 Technical Housing Standards - Nationally Described Space Standard, DCLG March 2015



## 3 Development Management Policies

for the Gross Internal (floor) Area of new dwellings at a defined level of occupancy as well as floor areas and dimensions for key parts of the home, notably bedrooms, storage and floor to ceiling height, as shown in the table below:

Number of bedrooms(b)	Number of bed spaces (persons)	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
1b	1p	39 (37) *			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3.0
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	
5b	6p	103	110	116	3.5
	7p	112	119	125	
	8p	121	128	134	
6b	7p	116	123	129	4.0
	8p	125	132	138	

### What has changed?

This is a new policy.

### Policy DM 14

#### Mix and Density

1. Subject to compliance with Policy DM13 (on national space standards), the unit size mix of market housing will be determined by developers in response to market demand. However, all major development comprising dwellings - with the exception of specialist housing developments - should provide some variety of dwelling sizes, to facilitate choice in the marketplace.
2. The unit size mix of social or affordable rented housing should be determined in consultation with the local planning authority housing department based on the most up to date evidence of need<sup>(9)</sup>.
3. The table below defines minimum gross residential densities<sup>(10)</sup> using local character and a transect-based approach. Maximum densities are not defined and appropriate densities should be determined based on:

<sup>9</sup> using Swindon Homebid affordable housing waiting lists

<sup>10</sup> in defining gross densities roads serving residential development and open spaces serving that development should be included but non-residential uses such as employment areas or schools and open spaces serving a wider area should be excluded

### 3 Development Management Policies

- a. accessibility to services and facilities by foot and access to high quality public transport;
- b. ability to achieve applicable parking standards;
- c. maximum densities consistent with achieving high quality design; and
- d. sunlight and daylight penetration and privacy.

			
Swindon Town and District Centres and 400m walk thereto, and Primary Rural Centres	Urban	Sub-urban	Urban-fringe/rural
50dph +	45dph	30dph	25dph

**3.4.3** The Swindon and Wiltshire Strategic Housing Market Area Assessment 2017 (SHMA) provides evidence of the projected need for different types of housing in Swindon Borough. The SHMA 2017 projection of future unit size mix requirements is shown in the table below alongside the unit size mix of dwellings built in the Borough between 2011 and 2018. On the face of it, this comparison appears to show under-delivery of 2 and 3-bed houses. However, the SHMA projection is based upon the assumption that newly forming households will occupy the same type and size of housing that existing households of similar age and size currently occupy. Yet, the existing houses occupied by households may simply be a reflection of the houses available (and therefore historic patterns of housebuilding) rather than households' preferences or the accommodation that would be best suited to their needs.

**3.4.4** 'Specialist housing' means accommodation for a group of people with specific needs (such as purpose-built accommodation for the elderly or students).

	SHMA 2017 projected mix 2016-2036	Dwellings build 2011-2018	Difference
1 bed flat	8%	13%	4%
2+ bed flat	6%	13%	6%
1 bed house	1%	1%	0%
2 bed house	18%	8%	-10%
3 bed house	52%	30%	-22%
4+ bed house	14%	36%	22%

**3.4.5** Overall, the Borough Council is of the view that housebuilders are generally far better placed than local government to assess the types and sizes of houses that their prospective purchasers would want to buy. It is therefore not proposed to seek to specify the dwelling mix that should be built



## 3 Development Management Policies

on sites, save in relation to affordable housing. However, the Borough Council considers that as a minimum major developments should contribute to providing some choice of dwellings. For example, development comprising exclusively 1-bedroom flats should be avoided. This will promote consumer choice and facilitate more rapid build out rates.

**3.4.6** Density is determined by developer assessments of the most viable form of development for the site and consumer demand. The Council's standards for on-plot car parking provision also determine densities, making it difficult to deliver densities in excess of circa 40 dwellings per hectare in most areas of the Borough. Within these constraints, the policy sets density minima based on character and the transect-based approach to density outlined in the Swindon Residential Design Guide SPD.

### What has changed?

The policy proposes to adopt a market-led approach to housing mix.

The new policy sets minimum residential densities to ensure effective use of land. Minimum densities would be based on local character.

### Policy DM 15

#### Affordable Housing

1. Except in Swindon Town Centre, to which paragraph 3 of this policy applies, on all developments of 10 homes or more, or on development sites of 0.5 hectares or more in area:
  - a. 10% of dwellings proposed in the development should be provided as affordable home ownership products and 20% of dwellings proposed in the development should be provided as affordable or social rented housing; or
  - b. where it can be robustly demonstrated to be appropriate, a proportionate contribution should be provided towards affordable homes off-site where on-site provision is not suitable.
2. On-site affordable housing should be integrated within the design and layout of a development so as not to be distinguishable from housing for open market sale and should be of a mix and tenure that reflects current need as advised by the Council's housing officer.
3. Within Swindon Town Centre (as shown on the policies map) 10% affordable housing will be sought as affordable home ownership housing.
4. The policy applies to any self-contained units of accommodation within a residential institution (Use Class C2).

**3.4.7** The Swindon and Wiltshire Strategic Housing Market Area Assessment 2017 (SHMA) found that affordable housing need in Swindon Borough would be equivalent to 31% of overall housing need. The policy seeks 30%.

**3.4.8** In accordance with national planning policy, 10% of dwellings on sites (other than build to rent sites, specialist housing, self or custom build, affordable housing only, or rural exception or entry-level exception sites) will be sought as affordable home ownership products as defined in national policy.

### 3 Development Management Policies

**3.4.9** The SHMA identifies that 78% of affordable housing need in Swindon Borough is likely to comprise need for affordable rented or social rented housing. Therefore, the remainder of affordable housing provision (20% of dwellings) is required by the policy to be provided as affordable or social rent.

**3.4.10** Paragraph 4 of the policy seeks that self-contained, 'extra care' housing that may fall within Use Class C2, should contribute to the provision of affordable housing.

**3.4.11** Within Swindon Town Centre the Council's recent development management experience is that development is unable to viably support affordable housing. In order to support the development of housing in the town centre to support its revitalisation, affordable housing requirement is limited to 10% for affordable home ownership products as required by national policy.

#### What has changed?

In comparison to Local Plan Policy HA1, the threshold for seeking affordable housing is dropped from 15 dwellings to 10 dwellings to ensure consistency with updated national policy.

The policy and supporting text is also updated to reflect the national policy requirement for delivery of 10% of dwellings as 'affordable home ownership' houses.

The policy is amended to require that 'extra care' residential units which fall within planning use class C2 but are self contained (i.e. have a kitchen and bathroom) should contribute to the provision of affordable housing. At present, affordable housing is only sought from new homes which fall within the C3 use class.

It is proposed to adopt a lower requirement for affordable housing (10% rather than 30%) in Swindon Town Centre to encourage development in this area as recent applications have been unable to viably support the delivery of affordable housing. This policy, if supported, will be tested as part of a whole-plan viability assessment.

A requirement for 30% affordable housing is proposed to be retained as this is supported by the SHMA 2017.

#### Policy DM 16

##### Housing for Older People

1. In order to meet the needs of an ageing population the Council encourages the provision of a range of specialist housing types, including extra care, retirement apartments and mainstream housing such as bungalows and sheltered housing.
2. Proposals will be permitted where they:
  - a. are accessible to a defined centre by a range of transport options including the public transport network and walking; and
  - b. can demonstrate that they have been designed to meet the specific needs of occupants with:
    - individual dwellings with inbuilt flexibility in accordance with the optional Building Regulations M4(2) Category 2: Accessible and adaptable dwellings) in order to enable easy adaptation to meet changing needs over time; and

## 3 Development Management Policies

- at least 50% of dwellings suitable for occupation by wheelchair users, or easily adaptable for residents who are wheelchair users (in accordance with the optional Building Regulations M4(3) Category 3: Wheelchair user dwellings); and
- all communal spaces and facilities (internal and external) provided as fully wheelchair accessible; and
- appropriate provision for the storage of scooters and wheelchairs.

**3.4.12** Evidence nationally and locally<sup>(11)</sup> supports the need to provide for specialist housing types to support an ageing population.

**3.4.13** The SHMA identifies that there is an overall need in Swindon Borough in the period 2016-2036 for 3,050 older person homes, broken down into the various house types in the table below.

**3.4.14** Where applicable pre-application discussions with SBC Adult Social Care or the Clinical Commissioning Group (CCG) are recommended in order to ensure proposals respond to identified local need.

SHMA 2017 Demand for older person housing 2016-2036		
Extra care	Owned	480
	Rented	240
Sheltered 'plus' or 'enhanced' sheltered	Owned	160
	Rented	160
Dementia		100
Leasehold Schemes for the Elderly (LSE)		1,910
<b>TOTAL</b>		<b>3,050</b>

### What has changed?

This is a new policy.

### Policy DM 17

#### Accessible Housing

1. In order to provide homes which are suitable for a range of occupants with differing needs and which will allow adaptation to meet the changing needs of occupants over time:

11 see Swindon Borough Council Local Plan Review specialist housing topic paper



### 3 Development Management Policies

- a. Development proposals of 10 dwellings or more should provide all new housing in accordance with the optional Building Regulations M4(2): Category 2 (Accessible and adaptable dwellings) or any subsequent update.
  - b. Development proposals for 25 dwellings or more should provide at least 10% of the dwellings to be suitable for occupation by wheelchair users in accordance with the optional Building Regulations M4(3): Category 3 requirements (Wheelchair user dwellings) or any subsequent update.
2. Providers of wheelchair user dwellings should have early discussions with the Council in order to obtain the most up-to-date information on specific need in the local area. Where through lifts are to be provided, these should be located in circulation space ie hallway/landing.
3. In order to demonstrate that a dwelling is capable of meeting the provisions for a wheelchair user dwelling, furnished plan layouts that show the access zones and other provisions should be provided to a scale of at least 1:100.
4. The Council will also support the provision of proposals for specialist housing other than wheelchair user homes where they meet the specific needs of people with disabilities.

**3.4.15** National policy emphasises the importance of addressing the needs of groups with specific housing requirements, including those with disabilities, and that this should be assessed and reflected in planning policies.

**3.4.16** Local evidence indicates demand for wheelchair user homes is high and that there is a lack of housing suitable for people with mobility issues and for wheelchair users in the Borough <sup>(12)</sup>.

#### What has changed?

The proportion required by Policy HA3 has been increased (from 2% to 10%) in order to increase provision and meet the demand for wheelchair user homes in the Borough.

The threshold has also been reduced from 50 to 25 dwellings to ensure that wheelchair user homes are delivered on a wide range of sites and potentially in a wider range of locations, not just on the strategic allocated sites.

The process of matching wheelchair user homes to potential occupants and ensuring that the adaptations (such as through lifts) meet their specific needs is complex. The policy therefore now includes wording to ensure providers enter into early discussions with the Council at the planning stage and that sufficient information is provided.

The policy now refers to the national accessibility standards included within the Part M4 Building Regulations. Requiring a proportion of Category 2 homes will help increase the Boroughs' stock of visitable and easily adaptable dwellings and enable older people to remain in their own homes for longer.

This policy, if supported, will be tested as part of a whole-plan viability assessment.

12 see Swindon Borough Council Local Plan Review specialist housing topic paper

## 3 Development Management Policies

### Policy DM 18

#### Annex Accommodation

Proposals for annex accommodation will be permitted where they are:

- a. in the same ownership as the principal dwelling and will continue to be so
- b. within the curtilage of the principal dwelling and shares its vehicular access and amenities including garden spaces
- c. ancillary to and subservient in scale to the principal dwelling
- d. have a functional link with the principal dwelling

**3.4.17** Granny annexes' form part of the wider offer of accommodation which can enable multi-generational living. They enable younger, older or disabled family members to live independently but still call on support from family members when needed.

**3.4.18** However, annexes should not create a self-contained dwelling.

#### What has changed?

This is a new policy.

### Policy DM 19

#### Agricultural Workers' Dwellings

1. Planning permission for a new dwelling to enable an agricultural worker to live at, or in the immediate vicinity of, their place of work will only be granted to support existing agricultural activities on an existing agricultural unit where:
  - a. an independent appraisal is submitted with the application demonstrating that there is an essential functional need for the proposed dwelling which cannot be met by existing suitable accommodation available in the area, or by rearranging duties and responsibilities between workers;
  - b. the size of the proposed dwelling is appropriate in light of that functional need;
  - c. financial information is submitted with the application to demonstrate the viability of the business;
  - d. where practicable, the dwelling should be provided by adapting an existing building on the holding. If this is not possible the new dwelling should be located in close proximity to existing farm buildings or other dwellings on the holding;

### 3 Development Management Policies

- e. the proposed dwelling would not result in harm to landscape character or visual amenity; and
  - f. occupancy is limited by way of a planning condition or obligation.
2. It may be necessary to impose a planning condition or obligation to prevent the severance of an agricultural dwelling from some or all of the land comprised in the agricultural unit the functional needs of which the dwelling is intended to meet.

**3.4.19** In accordance with national policy, Swindon Borough Council supports new rural workers' dwellings where they meet an essential need for a worker to live permanently at or near their place of work in the countryside.

#### What has changed?

The wording of new policy seeks to increase the clarity of the meaning of Local Plan 2026 Policy HA5.

The policy is re-worded to explain that the purpose of the dwelling is to enable a person to live at their place of work. Also, it is re-worded to apply only to existing agricultural units, not proposed agricultural businesses.

Rather than seeking that design harmonises with landscape character (this is difficult to judge), the proposed new wording seeks to avoid landscape and visual harm.

Paragraph 2 is a re-wording of the existing policy to reflect the fact that the purpose of an anti-severance condition is to prevent sale of the land separately to the dwelling, rather than to prevent it being sold separately to other farm buildings.

#### Policy DM 20

##### Housing on Retail Parks

Planning applications for the residential-led mixed-use or wholly residential redevelopment of out of town retail parks will be supported.

**3.4.20** Projected changes to shopping patterns mean that the demand for out-of-town retail warehouses is likely to reduce through the plan-period. The Swindon Retail and Leisure Needs Assessment 2017 shows that there is an over-supply of such premises in the Borough. This presents opportunities to create new homes on brownfield land in accessible locations. The Council will support such proposals, but will not support proposals for the creation within out of town retail parks of concentrations of leisure uses which might undermine the regeneration of Swindon Town Centre and the role of the district centres.

**3.4.21** 'Out of town retail parks' refers to any concentration of more than one retail unit which is not within a defined retail centre but is within the Swindon Urban Area or Rural Settlement Boundaries. The principal out of town retail parks in Swindon are identified in the Swindon Retail and Leisure Needs Assessment 2017 and are: Greenbridge Retail Park, Bridgemoor/Mannington Retail Park, Ocotol Way, Oxford Road/St Margaret's Retail Park, Paddington Drive and Barnfield Road.



## 3 Development Management Policies

### What has changed?

This is a new policy.

### Policy DM 21

#### Gypsies', Travellers' and Travelling Showpeople's Pitches and Sites

1. In the period 2018 to 2036 there is a need for between 11 and 23 additional pitches and 14 additional travelling showpeople's plots.
2. New permanent Gypsy and Traveller sites, and extensions to existing lawful sites will be permitted where:
  - a. The need for the new site/site extension has been demonstrated;
  - b. Access to shops, schools and health facilities from the site is adequate;
  - c. The design of the site provides adequate services, on site storage, landscaping and amenity space; and
  - d. The proposed development is acceptable under other policies of this plan, in particular Policy DM22 (Transport and Development), DM33 (Landscape), DM35 (Pollution).

**3.4.22** National Planning Policy for Traveller Sites (PPTS) requires local authorities to assess the need for pitches and plots for Gypsies, Travellers and Travelling Showpeople in their areas and to develop a strategy to meet the land requirement to meet those needs.

**3.4.23** The Swindon Borough Council Gypsy and Traveller Accommodation Assessment 2019 (RRR Consultancy) identifies an overall accommodation need in the local authority area over the period 2019-2036 for 23 additional pitches (ethnic definition), 20 pitches (PPTS 2015 definition) or 11 pitches (work PPTS interpretation). Additionally, there is a need for 14 additional Travelling Showpeople plots during the same period.

### What has changed?

The Council has commissioned updated evidence of the need for Gypsy and Travelling Showpeople's accommodation in the period to 2036. It is the Council's intention to identify and allocate land capable of accommodating this need and a call-for-sites is being undertaken alongside consultation on the draft plan.

## 3 Development Management Policies

### 3.5 Transport

#### Policy DM 22

##### Transport and Development

1. New development should be located and designed to reduce the need to travel and to encourage the use of sustainable transport modes, particularly walking and cycling, and provide the potential to maximise bus travel.
2. Development shall provide vehicular access that is appropriate to its scale, type and location without detriment to highway safety and local amenity, and safe and convenient pedestrian and cycle access.
3. Development shall not prejudice or impede an existing or planned cycle route, unless provision is made for an improved route for cyclists which is equally or more direct.
4. Development that results in the loss of existing rights of way or their disruption shall only be permitted when adequate, acceptable alternative provision or diversions are arranged.
5. Development shall not remove, narrow or materially impair the Thames Path or Ridgeway National Trails or public access to them.
6. Development shall provide appropriate mitigating measures to offset any adverse impacts on the transport network at both the construction and operational stages.
7. Parking provision, including secure cycle and motorcycle parking and electric vehicle charging points, should be provided in accordance with the Council's adopted parking standards.
8. Development proposals should integrate active travel routes and recreation routes into green infrastructure where possible.

**3.5.1** The policy requires development to provide for access by public transport, cycling and walking, including proper provision for access for all sections of the community.

**3.5.2** The policy also seeks to ensure that development will not harm national trails and existing and proposed bicycle routes. Proposed bicycle routes are defined in the Swindon Borough Local Cycling and Walking Infrastructure Plan.

**3.5.3** The Transport Requirements for Development SPD provides the detailed Local Highway Authority parameters for highway design together with detail on highways consenting processes and should be referred to in preparing planning applications.

#### What has changed?

The references in the current version of Policy TR2 to the need for transport assessments, transport statements and travel plans, which are validation requirements for planning applications, are deleted. These requirements are set out in the Planning Practice Guidance and in the Transport Requirements for Development SPD.

Policies TR1 and TR2 are consolidated into a single policy.

A new reference to integrating active travel routes and recreation routes within green infrastructure is added.

## 3 Development Management Policies

### 3.6 Infrastructure

#### Policy DM 23

##### Infrastructure Requirements Resulting from Development

All development, including development adjacent to but outside of the Swindon Borough boundary, shall make provision to:

- a. meet the cost of new infrastructure made necessary by the development (including cumulatively with other development);
- b. mitigate unacceptable impacts of the development on existing infrastructure and on the local community; and
- c. provide for the on-going management and maintenance of infrastructure delivered as a result of the development.

**3.6.1** The policy seeks to secure that infrastructure is provided to support new building in the Borough. The tests set out in national policy and in Regulation 122 of The Community Infrastructure Levy Regulations 2010 (as amended, or any successor legislation) will be applied in determining whether or not planning conditions or obligations can be used to secure the provision of infrastructure as part of the approval of a planning application.

#### What has changed?

The fourth and fifth bullet point of the current policy IN1 would only be consistent with Regulation 122 of the Community Infrastructure Levy Regulations 2010 if such infrastructure is necessary to mitigate the impact of the development. The mitigation of impacts is covered by the second bullet point. Therefore bullet points 4 and 5 of the current policy are deleted.

#### Policy DM 24

##### Water Supply and Wastewater and Sewerage Infrastructure

1. Developers will be required to demonstrate that there is adequate water supply, waste water capacity and surface water drainage both on and off the site to serve the development and that it would not lead to problems for existing or new users. Development will not be permitted unless such capacity is in place before the development is occupied. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing water and/or waste water infrastructure.
2. Drainage on the site must maintain separation of foul and surface flows.



### 3 Development Management Policies

3. Where there is an infrastructure capacity constraint the Council will require the developer to set out what appropriate improvements are required and how they will be delivered.
4. New dwellings must meet the Building Regulations optional requirement of 110 litres/person/day<sup>(13)</sup> (or successor standards).

**3.6.2** Swindon forms a part of Thames Water's Swindon and Oxfordshire Water Resources Zone (SWOX). Thames Water acknowledge that pressure on water resources within their region will increase significantly as a result of planned housing growth. The whole region, including SWOX, is classified as being seriously water stressed.

**3.6.3** The Swindon Water Cycle Study (2014) concluded that, with demand management measures, there would be sufficient water supplies to deliver the anticipated level for population growth in Swindon Borough up to 2026.

**3.6.4** In SWOX Thames Water predicts a water supply deficit in a dry year critical period growing from -1 MI/d in 2020 to -32 MI/d by 2040. These changes are principally driven by the impact of climate change on groundwater sources and therefore a reduction in available deployable output. The Thames Water Resources Management Plan 2015 – 2040 proposes demand management to address a supply/demand balance shortfall.

**3.6.5** The water supply position:

- shows the importance of assessing through the development management process the adequacy of both water supply and waste water to serve prospective development; and
- provides a strong justification for the use of the optional requirement in the Building Regulations for water efficiency in dwellings.

#### What has changed

This is an updated version of Policy IN2 suggested by Thames Water. In view of water stress in the region, it is proposed to adopt the enhanced Building Regulations standard for water efficiency in new dwellings.

#### Policy DM 25

##### Low Carbon and Renewable Energy

1. Renewable and low carbon energy infrastructure will be encouraged. Such proposals, including large-scale freestanding installations, will be assessed under national policies and in terms of their:
  - a. social and economic benefits (including local job creation opportunities); and
  - b. whether any adverse environmental or amenity impacts are or can be made acceptable.

13 The Building Regulations 2010 Approved Document G2

### 3 Development Management Policies

2. Any heat produced as part of energy generation should be productively used on-site or linked to a district energy network.
3. Renewable and low carbon energy generation schemes brought forward by communities, or with major community benefits, will be encouraged and supported in principle.
4. The provision of renewable, decentralised or low carbon energy supply as part of wider development schemes, for example residential or business developments, will be supported.
5. In accordance with national policy, wind turbines will only be supported in locations identified as suitable for such development in a neighbourhood plan, and provided, following consultation, it can be demonstrated that the planning impacts identified by the affected local community have been fully addressed and the proposal has their backing.

**3.6.6** Swindon Borough Council is investing in renewable energy projects with two solar park projects: a 40MW PV solar farm at Wroughton Airfield and an 8MW solar farm at the former landfill at Chapel Farm. The Council has made Local Development Orders covering several sites for solar arrays and solar farms. Renewable energy generation in the Borough in 2017 was 2.21 megawatt hours per household, the 118th highest of 406 UK and Northern Irish local authorities<sup>(14)</sup>.

**3.6.7** The policy supports the development of further renewable energy proposals in appropriate locations, subject to their being able to acceptably address their impacts. Environmental and amenity impacts will be assessed against the policies of this plan and could include (without limitation) air quality impacts, odour, noise, shadow flicker, insect and vermin infestation, landscape and visual impacts, impacts on the road network, water contamination, impacts on the setting of heritage assets, and impacts on biodiversity.

#### What has changed?

Reference in current Policy IN4 to the low carbon electricity target by 2020 is deleted as this is now out of date.

References to a locally delivered modular district energy network are deleted on the basis that this is now unlikely to be delivered. This is replaced with a policy supporting decentralised, renewable or low carbon energy.

The wording is amended to match national policy which asks whether adverse impacts are or can be made acceptable.

The identification of suitable locations for wind turbines would be locally led through neighbourhood planning.

#### Policy DM 26

##### ICT and Telecommunications

Communications infrastructure will be supported in accordance with national policy, provided that:

14 Department for Business, Energy and Industrial Strategy Regional Renewable Statistic <https://www.gov.uk/government/statistics/regional-renewable-statistics>

### 3 Development Management Policies

- a. the siting of the proposal and any other additional equipment involved with the development does not unduly detract from the appearance of the surrounding area or form an adversely intrusive addition to the street scene;
- b. the amenities of neighbouring occupiers are not unacceptably harmed;
- c. the colour and profile are sympathetic to the site surroundings and the size of the development is kept to a technical minimum to ensure any adverse impact on the environment is minimised; and
- d. the application demonstrates that alternative sites, including mast sharing and the use of existing buildings and structures, which fulfil the functional requirements of the development but which would have a lesser impact on the appearance of the surrounding area and on neighbouring occupiers, have been assessed and found not to be available.

**3.6.8** This criteria-based policy provides the basis for assessment of all applications for telecommunication development, whether they are progressed as prior approval applications or full planning applications. It provides guidance for both new and replacement masts, whilst providing the flexibility to allow for an efficient expansion of the network and to meet the demands imposed by technological advancements.

**3.6.9** Applicants should also have regard to national policy, which requires that applicants demonstrate that the proposed development will not exceed International Commission guidelines on non-ionising radiation protection, that they have undertaken consultation with those affected by the development, and that the development would not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest.

#### What has changed?

Paragraph 112 of the NPPF provides policy on electronic communications and the proposed updated version of Policy IN3 reflects that.

Paragraph d of the policy is amended to clarify which alternative sites need to be considered. The requirement in current Policy IN3 to consider 'all alternative sites' is considered to be excessively onerous and is amended.

### 3.7 Community Facilities

#### Policy DM 27

##### Community Facilities

1. Proposals for new or extended community facilities will be supported where:
  - a. the site is located within or adjacent to existing settlements;



### 3 Development Management Policies

- b. the site is accessible for all members of the community and by a range of transport modes including walking and cycling; and
  - c. if possible, the site is co-located with or will support co-location with other community uses.
- 2. Proposals that result in the loss of established community facilities shall only be permitted where it can be demonstrated that:
  - a. commercial facilities have been genuinely marketed for the established use for at least one year; and
  - b. the facility is no longer economically viable for the established use, or there is a suitable alternative or equivalent quality to that facility nearby, or the facility is no longer required by the local community.

**3.7.1** The policy supports the provision of community facilities in appropriate locations. In accordance with national policy, the Borough will seek to retain community facilities, including (without limitation): public halls (including community/youth centres), church halls; Post Offices; local shops within both urban and rural areas; indoor and outdoor sports facilities; schools and non-residential education and training centres; places of worship; libraries; day nurseries/crèches; health centres, clinics, consulting rooms (including GP surgeries and dental practices); museums, art galleries; Public Houses; leisure facilities; open space; emergency services; cultural event space; and cemeteries/ burial grounds. This list is not exhaustive and all proposals will be considered on a case by case basis, taking into account the importance of the facility to the local community.

#### What has changed?

The use of the words 'particularly where' in current Policy CM4 render the following paragraphs on the location of community facilities advisory only. 'Particularly' is therefore deleted.

The words of Policy CM4 referring to facilities being located where they would 'promote social inclusion' are replaced with a more precise reference to facilities being accessible by a range of transport modes.

In the final bullet point, 'no longer required' is amended to say 'no longer required by the local community' to make it clear that it is the requirements of the community for the facility, not the requirements of the landowner, that are being assessed.

## 3 Development Management Policies

### 3.8 Open Space and Green Infrastructure

#### Policy DM 28

##### Green Infrastructure

1. Development shall maintain, enhance and where possible provide additional green infrastructure,<sup>(15)</sup> to provide recreation, climate change mitigation, water management, connectivity and accessibility by walking and cycling, and to sustain and increase ecological networks.
2. Development should not result in the loss of visually or ecologically important features including trees, hedges and woodlands<sup>(16)</sup>. Existing trees, hedgerows and woodland should be sympathetically integrated into the design of development. Where the development would result in the loss of existing trees, hedgerows or woodland, and this can be justified by the benefits of the development, the loss should be mitigated by new tree planting within the development.
3. The integrity of green infrastructure corridors (as shown on the policies map) should be protected and enhanced as a result of development. Development that would sever or significantly reduce a green infrastructure corridor will be refused.
4. Development proposals should integrate green infrastructure into the development design, and maximise connections with existing green infrastructure.
5. The multifunctionality of green infrastructure in new development should be maximised, whilst ensuring it can properly fulfill its main functions.
6. Details of long-term maintenance, management and funding arrangements for each green infrastructure function must be provided at the application stage. The Borough Council does not adopt or maintain green infrastructure and a management or community interest company arrangement should be used save where the Parish Council is willing to take ownership of and maintain the space.

**3.8.1** The policy seeks to protect and create (and ensure the maintenance of) a multifunctional and connected green infrastructure network. The policy seeks to ensure that within developments green infrastructure is designed in such a way that opportunities to provide connectivity with existing green infrastructure at Boroughwide and local level are taken forward.

**3.8.2** The protection and expansion of trees and woodland could make a significant contribution to climate change adaptation and mitigation<sup>(17)</sup> and the policy seeks to protect this resource.

**3.8.3** Where trees, hedges or woodlands are present on or adjacent to a development site a full report to BS5837:2012 'Trees in relation to design, demolition and construction – recommendations' will be required when considering the proposal to assess its impact on trees. The report will define the minimum distance between construction and retained trees and hedges which the Borough Council may increase where appropriate to account for site specific circumstances and to eliminate post development pressure on trees, hedges and woodlands.

15 A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities. This includes: biodiversity sites; country parks; semi natural greenspaces; cemeteries; trees and hedgerows; green roofs; rights of way and designated pedestrian/cycle routes; the canal network; water courses and associated floodplains; linear green routes; open spaces (including outdoor sports facilities, general recreational areas, allotments and play areas); and woodlands.

16 ancient woodlands and veteran trees are protected by Policy DM32

17 As highlighted by the Committee on Climate Change report 'Land use: reducing emissions and preparing for climate change' (November 2018).

## 3 Development Management Policies

**3.8.4** The Council will be undertaking a Nature Recovery Strategy which will incorporate a review of the Green Infrastructure Strategy (2011). This will identify strategic measures to restore and enhance the green infrastructure network. The green infrastructure policy and associated policies (DM28-DM32) may therefore change following any recommendations that emerge from this work.

### What has changed?

The current policy is not consistent with national policy as it suggests that the loss of irreplaceable habitats including ancient woodland and veteran trees should simply be weighed against the need for development. National policy states that there must be wholly exceptional circumstances to justify such loss. This wording more appropriately sits within policy on biodiversity and so is deleted from this policy and moved to Policy DM32.

The new policy wording provides more detail about the protection and integration of trees, hedgerows and woodlands into new development and when their loss can be justified and how this should be mitigated.

New wording is also included about the protection of the integrity of the strategic green infrastructure corridors shown on the policies map.

New wording is included regarding requirements for new green infrastructure. This includes wording on the integration of green infrastructure as part of the development design and with existing green infrastructure, as well as new wording to ensure the multifunctionality of new green infrastructure does not compromise the ability for it to fulfil its intended functions.

Finally, new wording is included regarding arrangements for the future maintenance, management and funding of new green infrastructure.

### Policy DM 29

#### Great Western Community Forest

Development shall contribute towards the aims and objectives of the Great Western Community Forest (GWCF) in Swindon. This will be achieved by:

- a. ensuring a net increase in tree cover through the planting of new woodland and trees;
- b. creating or enhancing habitats for biodiversity, including built structures in accordance with Policy DM32; and
- c. ensuring access to local woodlands and opportunities for communities and businesses to benefit from GWCF.

**3.8.5** The Great Western Community Forest (GWCF) covers the whole of Swindon Borough and reaches into neighbouring Oxfordshire and Wiltshire. The purpose of GWCF is to create a multi-purpose forest throughout Swindon Borough. Multi-purpose forestry encompasses the creation and use of a diverse natural and built environment including trees and woodland, grassland, wetlands, hedgerows, ponds and rivers. A Forest Plan (1994, 2002- 2027) sets out GWCF objectives to meet environmental, social and economic aims. The range of functions and benefits include carbon capture, biomass production, and control of micro-climate in addition to landscape, recreation, biodiversity and other eco-system service benefits. The GWCF is an integral part of developing Swindon Borough's green infrastructure.



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**3.8.6** The GWCF has an overall target of achieving 30% woodland and tree cover across the Borough. A recent study showed that Swindon has amongst the lowest percentages of tree cover of major UK towns and cities at 8%<sup>(18)</sup>.

### What has changed?

This policy is unaltered.

### Policy DM 30

#### Protecting Open Space

Public open space assets defined on the policies map will be protected from development unless:

- a. the proposed development is ancillary to and protects the main open space function of the site; or
- b. the proposed development is of a community facility the benefits of which outweigh the loss of open space; or
- c. the development of a small part of a larger area will provide enhancements to the quality of the remaining area without compromising the integrity or role of the open space as a whole; or
- d. the proposed development is supported by an open space appraisal which shows that the open space is surplus to requirements because there are sufficient open spaces in the ward to meet the quantity requirements in Appendix 1 and there are alternative open spaces of satisfactory quality within the walking catchments set out in Appendix 1; or
- e. the proposed development will re-provide open space of at least equivalent size, quality and accessibility the benefits of which to the community will outweigh the loss.

In accordance with national policy, the policy seeks to protect public open spaces save in the circumstances specified, where the loss is justified.

### What has changed?

Current Local Plan Policy EN3 has been amended to introduce a new category of acceptable development of public open space for where development of a small part of an open space can enhance the remainder.

The wording of the 'provides community benefit' exception is amended to make clear that this only applies to community facilities.

18 Doick, K.J., Davies, H.J., Moss, J., Coventry, R., Handley, P., Rogers, K. and Simpkin, P., 2017. The Canopy Cover of England's Towns and Cities: baselining and setting targets to improve human health and well-being. *Trees, People and the Built Environment III, Birmingham*.

## 3 Development Management Policies

### Policy DM 31

#### Open Space in New Development

1. Residential development shall provide on-site or contribute towards provision of outdoor sports space, children's and teenagers' play-space, allotments and general recreational areas in accordance with the standards and specifications set out in Council's open space requirements at Appendix 1.
2. Where on-site provision of public open space is required by the standards, this should be provided unless the size or nature of the site means that this is not possible in design terms.
3. Where the development exceeds the threshold in paragraph 1 of this policy but on-site provision is not required by the standards in Appendix 1 or is determined not to be possible or desirable under paragraph 2, contributions towards off-site provision will be required and will be calculated in accordance with Appendix 1. Contributions will be applied to projects to create new public spaces or enhance existing public spaces in the relevant category.
4. Within Swindon Town Centre, provision of general recreation areas at levels below the area standards in Appendix 1 will be supported provided that the proposed public open space is of high quality design and materials which would enable it to support intensive use.
5. Arrangements for the future maintenance, management and funding of open space provided on-site must be put in place. Unless a parish council is willing to take ownership and/or maintain the public space, a management or community interest company should be established. In the event that the open space is to be maintained by a parish council, a contribution towards five years' establishment maintenance, calculated in accordance with Appendix 1, will be required. Where contributions to off-site open space public open space provision are provided in lieu of on-site provision, those contributions will include a contribution to establishment maintenance as set out in Appendix 1.

**3.8.7** The policy seeks to ensure that new residential developments provide or contribute to the provision of new public open space to meet their needs. Appendix 1 provides the Council's standards which are informed by the Open Space Audit and Assessment 2019. The policy seeks provision of open space of three broad types:

#### Outdoor Sports

**3.8.8** The Open Space Audit and Assessment 2014 found under-provision of open space for outdoor sports as against standards in all but two of the Borough's wards. The Playing Pitch Strategy 2017 evidences a need to deliver additional playing pitches for pitch sports in the period to 2021. Appendix 10 of the Strategy indicates a standard of 0.8 hectares of playing pitches per 1,000 people across the Borough would be required in 2021 adjusting for changes in demand. This calculation is based on the area of the pitches themselves and does not incorporate the area taken by changing rooms, fencing or enclosure planting, flood lighting, paths between pitches, car parking, etc. Additionally, this number excludes non-pitch outdoor sports facilities, such as tennis and basketball courts, bowls greens or athletic tracks. Similarly, this number does not take into account existing quantitative and qualitative under-provision as documented in the Playing Pitch Strategy. Therefore, the standard of 1.6ha/1,000 people for outdoor sports contained in the Swindon Local Plan 2026 and used in Fields in Trust's 2015 Guidance for Outdoor Sports and Play remains an appropriate standard for use in new development.

## 3 Development Management Policies

**3.8.9** In accordance with The Playing Pitch Strategy, the policy of the Borough will be to secure and upgrade existing outdoor sports facilities, while providing new pitches and other facilities in sports hubs which would have sufficient usage to pay for their own maintenance over the longer term. The nature of sports facilities and clubs is that they have a Borough-wide catchment. All new housebuilding will increase the need for new sports facilities and the intensity of use of existing facilities. It is therefore necessary that all housebuilding, not just that on large sites which will provide pitches on-site, contributes to meeting the additional demand it generates for outdoor sports facilities and mitigating the impact of this on existing facilities. Contributions are based on the cost of providing the new or like-for-like replacement of facilities (excluding land cost) necessary to accommodate the demand created by residents of the proposed housing.

### Play Space

**3.8.10** The Open Space Audit and Assessment 2019 update demonstrates that there is a shortage of play spaces in all of the Borough's wards when compared to the standard of 0.3ha per 1,000 people in the Local Plan 2026. The Borough's standard of 0.3ha/1,000 people is below the Fields in Trust 2015 guidance which seeks 0.55ha/1,000 people for equipped designated areas and other outdoor provision combined. However, the Borough's lower standard is considered to achieve an appropriate balance between quantity and quality of provision, and is considered to remain appropriate.

**3.8.11** New developments above the site size thresholds will need to deliver on-site provision of play space. Development which is not large enough to support the creation of a new play spaces within its site area will increase the intensity of use of existing play areas, which will consequently require more frequent refurbishment and replacement, and may exacerbate existing under-provision in an area creating the need for new play areas for be provided off-site. It is therefore necessary that all residential developments of 10 dwellings or more or 1,000m<sup>2</sup> in gross floor area contribute to mitigate their impact on existing play spaces or to provide for new spaces off-site, unless it can be shown that all dwellings within the development are within the threshold walking distances (600m for a Neighbourhood level equipped play space, or 250m for a local level equipped play space) of existing play spaces of acceptable quality. Contributions are based on the cost of providing the relevant fraction of a new facility (excluding land cost) that the population of the proposed housing would require. The cost of a new facility is an appropriate basis for calculating contributions because the refurbishment or upgrading of existing facilities which are below quality standards will require the purchase of new equipment and furniture and resurfacing and re-fencing of areas. These are the same costs that would be incurred in the provision of a new facility.

**3.8.12** Specifications for play spaces appear in the table in Appendix 1. Note that the Borough's standards and typologies are not the same as those used in Fields in Trust guidance. The Borough Council does not seek local areas of play (LAPs) as referred to in Fields in Trust guidance as the Council's experience is that LAPs provide limited utility to residents and can create a maintenance obligation which it may be difficult for adjacent properties to support. Larger, better equipped areas of play are therefore sought.

### General Recreational Areas

**3.8.13** There is a growing body of evidence on the importance to physical and mental health and to climate change mitigation and adaptation of providing green space within development. Fields in Trust recommends a requirement of 3.2ha per 1,000 population for informal recreation which it breaks down into sub-categories of parks and gardens, amenity green space, and natural and semi-natural space. Swindon Borough Council has historically adopted a requirement of 1ha for general recreational areas, incorporating all of the Fields in Trust categories, per 1,000 persons. The Open Space Assessment and Audit 2019 finds acceptable levels of provision against this target in all of the Borough's wards, but much existing provision comprises areas of lower functionality for recreational use. Experience has shown that on some new housing estates, significant parts of the 1ha/1,000 persons requirement have been used up in accommodating drainage features, verges and other



## 3 Development Management Policies

incidental areas of space which are unsuitable for informal recreation. Therefore, the policy includes a new specification (set out in Appendix 1) for general recreational areas which excludes such areas and provides quality requirements to ensure that functional green spaces are provided.

### Allotments

**3.8.14** The National Society of Allotment and Leisure Gardeners recommends the provision of one full allotment per 200 people, which equates to a standard of 0.25 hectares per 1,000 people. Swindon Borough's Local Plan 2026 uses a standard of 0.3 hectares per 1,000 people to allow for the provision of car parking and access footpaths to serve allotments. The Borough has 37.27ha of allotments and an estimated mid 2017 population of 220,363. Existing level of provision Borough-wide is therefore 0.17ha per 1,000 people. On this basis it is considered appropriate to retain a standard of 0.3ha/1,000 for new development in the Borough.

### Installation

**3.8.15** The Council will through planning obligations ensure that areas of public open space and landscaping are provided in accordance with approved plans before 80% of dwellings in the relevant phase are occupied. Planning obligations will ensure the ongoing monitoring and maintenance/replacement of the space until it is established and will provide for management arrangements thereafter.

### Management Companies

**3.8.16** The Council intends to publish guidance on setting up management companies to manage public open space.

#### What has changed?

The policy retains the categories of outdoor sports, play space and amenity green space. To provide greater clarity for developers, the triggers for on-site provision and specifications for the open spaces are provided in appendix 1. Appendix 1 also provides details of contributions that will be sought.

## 3.9 Landscape, Biodiversity and Heritage

### Policy DM 32

#### Biodiversity

1. All development shall minimise its impact upon and provide net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.
2. The effect of development proposals on the sites and species identified in the table below must be assessed and protection commensurate with their designation or status (identified in the table below) and in accordance with national policy will be given.
3. National policy and applicable legislation on habitats and biodiversity – including the 'mitigation hierarchy' of avoid, mitigate, compensate – will be applied in the determination of planning applications.
4. All developments must secure measurable net gains for biodiversity.

### 3 Development Management Policies

Internationally/European designated sites	<p>There are no such sites within the Borough, but the potential cross-boundary and in-combination impacts on sites outside of the Borough should be considered. These sites include:</p> <ul style="list-style-type: none"> <li>i) Special Protection Areas and Special Areas of Conservation</li> <li>ii) potential Special Protection Areas and possible Special Areas of Conservation</li> <li>iii) Listed or proposed Ramsar sites</li> <li>iv) Sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas and possible Special Areas of Conservation, and listed or proposed Ramsar sites.</li> </ul> <p>The location of sites can be found on DEFRA's MagicMap: <a href="https://magic.defra.gov.uk/MagicMap.aspx">https://magic.defra.gov.uk/MagicMap.aspx</a></p>
Nationally designated sites	Sites of Special Scientific Interest as shown on the DEFRA's MagicMap: <a href="https://magic.defra.gov.uk/MagicMap.aspx">https://magic.defra.gov.uk/MagicMap.aspx</a>
Irreplaceable habitats or ecological features	Include ancient woodland which is mapped in DEFRA mapping <a href="https://magic.defra.gov.uk/MagicMap.aspx">https://magic.defra.gov.uk/MagicMap.aspx</a> and species-rich grassland, veteran trees, hedgerows derived from ancient woodland, wood-pasture and parkland.
Protected and priority species and priority habitats	European protected species and UK priority species and habitats <sup>(19)</sup> .
Locally designated sites	County Wildlife Sites and Local Nature Reserves as shown on the policies map
Other sites	Existing green infrastructure where this could constitute an ecological network, wildlife corridor, nodes and stepping stones for wildlife. Green infrastructure corridors are shown on the policies map (see Policy DM28 Green Infrastructure).

**3.9.1** In accordance with national policy, the policy identifies the hierarchy of designated sites within Swindon Borough and gives effect to national policy on protecting and enhancing biodiversity.

#### What has changed?

Policy EN4 is simplified to avoid paraphrasing national policy.

Additionally, the new policy reflects national requirements to ensure that new development achieved net gains for biodiversity.

<sup>19</sup> Species and Habitats of Principal Importance included in the England Biodiversity List published by the Secretary of State under section 41 of the Natural Environment and Rural Communities Act 2006

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### Policy DM 33

#### Landscape

1. Proposals for development will only be permitted when:
  - a. the intrinsic character, diversity and local distinctiveness of landscape within Swindon Borough are protected, conserved and enhanced;
  - b. the design of the development and materials used are sympathetic to the surrounding landscape;
  - c. unacceptable impacts upon the landscape are avoided; and,
  - d. where other negative impacts are considered unavoidable, they are satisfactorily mitigated.
2. In meeting the requirements of paragraph 1 of this policy, applicants for development should demonstrate how they have taken into account Landscape Character Assessments and assessed the potential impact of the proposal upon the following attributes of the landscape:
  - a. existing landscape form, features, topography and character;
  - b. the contribution of the landscape to biodiversity and wildlife;
  - c. local geology and geo-diversity;
  - d. views, visual amenity and the landscape setting;
  - e. valuable historic and heritage areas and assets;
  - f. environmental amenity such as tranquillity and noise, pollution and light pollution; and,
  - g. the existing social, physical, economic and environmental roles and functions of the landscape at the local and strategic scale (for example as a place of cultural and leisure activity, living, employment and separation of settlements).
3. National policy and legislation will be applied in assessing proposals within or affecting the setting of The North Wessex Downs Area of Outstanding Natural Beauty. Regard will be had to the North Wessex Downs AONB Management Plan in considering such applications.

**3.9.2** Development proposals should take account of their surroundings, harmonising with their surroundings and the local landscape features.

**3.9.3** It is essential that new development should help sustain and/or create landscapes with a strong sense of place and local identity and take account of the following features:

- Biodiversity - locally distinctive and characteristic pattern and species composition of natural features such as trees hedgerows, woodland field boundaries watercourses and water-bodies;



### 3 Development Management Policies

- Geology - locally distinctive and characteristic landforms and topographical features throughout the Borough such as locally important views, sensitive sky lines, ridges and valleys;
- History - locally distinctive settlement patterns, building materials, and heritage assets;
- Views both in and out - visually sensitive skylines, geological and topographical features; and
- The separate identity of settlements and the transition between man-made and natural landscapes at the urban fringe.

**3.9.4** The North Wessex Downs AONB lies to the south, partly within Swindon Borough. AONBs are protected under the existing statutory requirements of Section 85 of the Countryside and Rights of Way Act 2000. National policy sets out the government's required approach to considering development proposals within AONBs.

**3.9.5** The North Wessex Downs Management Plan sets out a planning and management approach to the North Wessex Downs and should be used to inform relevant development proposals.

#### What has changed?

Only minor amendments have been made to Policy EN5. The new proposed policy wording makes cross-references to national policy and legislation on development in Areas of Outstanding Natural Beauty.

#### Historic Environment

**3.9.6** Swindon Borough has more than 1,000 listed buildings, 28 Conservation Areas (shown on the policies map) and 53 Scheduled Ancient Monuments. The Swindon Railway Quarter Heritage Action Zone designation provides an opportunity to revitalise Swindon's railway quarter. Policy LA6 sets out principles for the redevelopment of the Old Town Hall and Corn Exchange.

**3.9.7** National Planning Policy Framework and Planning Practice Guidance provide policy to be applied in considering development proposals that may affect designated or non-designated heritage assets, including their settings. In relation to designated heritage assets, the legal duties in the Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990 must be applied.

#### Historic Environment Policy Options

The Council are considering options for updating Local Plan 2026 Policy EN10 (Historic Environment and Heritage Assets).

One option would be to keep that policy unaltered.

Alternatively, we are considering the option of shortening the policy. National policy and legislation provides detailed guidance on the approach to be taken in determining applications which affect the historic environment and there is some concern that local paraphrasing could risk inconsistency. NPPF paragraph 16(f) policy now advises local authorities should avoid duplicating national policy, unless this is necessary. Under this option we would instead signpost to relevant national policy and legislation. We would be keen to receive feedback on this potential approach.

However, we are keen to reflect local policy objectives for the historic environment that are additional to national policy. We would be keen to hear about local objectives that the policy should reflect.

## 3 Development Management Policies

### Heritage Transport

**3.9.8** Local Plan 2026 Policy EN11 seeks to protect the historic alignment of the Wilts and Berks Canal to allow for potential future recreation of the canal. Additionally, the policy safeguards a deviation route for the Swindon and Cricklade Heritage Railway from its present terminus at Taw Hill Halt south to a new terminus in the Mouldon Hill Country Park.

**3.9.9** Sections of canal have been delivered within the Wichelstowe development and negotiations are underway to safeguard land for possible future canal delivery within the New Eastern Villages. The Wiltshire and Berkshire Canal Trust has suggested that the policy should be extended to safeguard a 30m wide corridor along the historic canal route.

**3.9.10** However, there are questions about whether or not sections of the proposed canal route are realistically deliverable. This is particularly the case within Swindon town centre, where it would require the stopping up of roads and the diversion of utilities.

**3.9.11** Therefore, the Council is consulting on options for how the policy should look in the new Local Plan. National policy states that policies should be justified by evidence and deliverable.

#### Heritage Transport Options

In view of the above, the LPA is seeking stakeholder views on a range of policy options. The following options have been identified:

1. Retain the policy in its current form
2. Retain the policy, but amend it to extend the protection to a 30m canal corridor
3. Retain the policy, but amend it to state that it does not apply within Swindon town centre

### 3.10 Flood Risk and Pollution

#### Policy DM 34

##### Flood Risk

1. National policy and guidance on the requirement for a site specific flood risk assessment and on the sequential and exception tests will be applied in the consideration of planning applications.
2. All new development within Flood Zones 2 and 3 or extent of any other source of flooding must not result in a net loss of flood storage capacity. Where possible, opportunities should be sought to achieve a net increase in the provision of floodplain storage.
3. For developments located in areas at risk of fluvial, surface water and groundwater flooding, safe access/egress must be provided for new development.
4. All new development should not adversely affect flood routing and thereby increase flood risk elsewhere. Opportunities should be sought within the site design to make space for water and therefore reduced flood risk elsewhere.
5. Planning applications for major developments (as defined in the Town and Country Planning (Development Management Procedure) Order 2015) shall be required to provide a drainage strategy. Such developments will be expected to ensure that run-off rates are attenuated to greenfield run-off rates. Higher rates would need to be justified and the risks quantified.

### 3 Development Management Policies

6. Suitable surface water management measures should be incorporated into all new development designs in order to reduce and manage surface water flood risk to, and posed by proposed development. This should be achieved by incorporating Sustainable Drainage Systems (SuDS).
7. SuDs should protect and seek to enhance water quality and biodiversity.
8. Development proposals should integrate naturalised SuDs features into the design of green infrastructure, and where they are part of open space they should be safe and accessible and should not compromise the functionality of open space.

**3.10.1** The policy seeks to direct vulnerable development away from areas at risk of flooding. It also seeks to resist development that would increase the risk of flooding elsewhere. This is achieved through the application of national policy on the sequential and exception tests.

**3.10.2** The policy also reflects the findings of the Council's Level 1 Strategic Flood Risk Assessment (SFRA) (2019) which identifies that a number of areas across the Borough are at risk of flooding from various sources and it is expected that, even with no further development, the impacts of climate change are likely to increase this risk. The SFRA outlines that in order to manage this risk it is essential that future development is planned appropriately to ensure where possible:

- Development is located in the lowest areas of flood risk;
- Measures are put in place to mitigate new development against flood risk and ensure that it does not increase flood risk elsewhere;
- Surface water is managed effectively on site through the appropriate application of SuDS; and
- Opportunities are sought to reduce the overall level of flood risk in the area and beyond through the layout and form of the development.

#### What has changed?

The policy now signposts to national policy on flood risk which is detailed and does not need to be paraphrased in the Local Plan.

The thresholds for a requirement for a site specific FRA are set in the national Planning Practice Guidance and so are omitted from the policy (these requirements are set out in the current version of Policy EN6).

The policy also reflects findings of the Level 1 Strategic Flood Risk Assessment, and policy wording has been added on flood storage capacity, safe access and egress in developments in areas at risk of flooding, and that development should not increase flood risk elsewhere.

It is not proportionate to request that a drainage strategy is submitted with all planning applications and so this requirement is amended to apply only to applications for major development.

The policy also includes more detail on the requirements for Sustainable Drainage Systems, including references to water quality, biodiversity, and the integration of SuDs within multifunctional green infrastructure.



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### Policy DM 35

#### Pollution

1. Development shall not cause or be affected by unacceptable harm to human health, living conditions, or the natural environment through air, water, noise, or light pollution, or land contamination or instability.

#### Noise and Light Pollution

2. In accordance with national policy, noise pollution, harm to tranquil areas, and light pollution should be limited.

#### Contaminated Land

3. National policy on the remediation of contaminated land will be applied. After remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990.

#### Water Quality

4. Development shall not harm surface or ground water quality, including through the mobilisation of contaminants already in the ground.

#### Air Quality

5. Cumulative impacts of development on air quality, including Air Quality Management Areas and areas at risk of exceeding relevant limit values<sup>(20)</sup> for air pollution, will be considered in determining planning applications. Major development proposals which would impact upon areas identified at being at risk of non-compliance with limit values in the Council's most recent Air Quality Annual Status Report<sup>(21)</sup> should be supported by an air quality assessment. Where an air quality assessment indicates that the proposal would be likely to be in conflict with paragraph 6 of this policy, and where that conflict cannot be mitigated, planning permission may be refused.
6. Development shall not lead to a further deterioration of existing areas of poor air quality, create new areas that exceed limits, or expose future residents or building users to unacceptable levels of air quality.
7. Development should make a positive contribution to air quality improvements where this is possible.
8. Where it is identified that a development proposal could be at risk from exposure to air pollution or contribute to air pollution problems elsewhere, the following measures may be sought:
  - a. Design measures such as altering the siting, orientation and/or massing of buildings to avoid trapping air pollution roadside by creating canyons; locating habitable accommodation away from busy roads; requiring roadside habitable room windows

20 limit values or national objectives set out in The Air Quality (Standards) Regulations 2010 or any updated or replacement standards that may be adopted from time to time

21 At the time of draft plan preparation the most recent version is the 2018 Status Report and the following locations are identified: Swindon 1 - GWR Museum, Swindon 12 - Manchester Rd, Swindon 14 - Kingshill Rd/Clifton St, Swindon 18 - 102 Kingshill Road, Swindon 23 - 37 Devizes Rd, Swindon 25 - 68 Cheney Manor Rd (Rodbourn Rd)

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to be non-openable and alternative means of ventilation to be provided; requiring the creation landscape buffers between air pollution sources and receptors; ensuring point sources of air pollution are suitably ventilated away from receptors.

- b. Reduction measures such as the provision of on-site electric vehicle charging points and car club spaces; enhancements to bicycle infrastructure; site travel plans; the planting of street trees.

**3.10.3** The policy seeks to protect the living and working environment in the Borough from pollution. The 'agent of change' principle in national policy will be applied where a new development could be subject to adverse impacts by reason of its proximity to an existing business or facility. In such circumstances the onus will be on the promoter of the new development to demonstrate adequate mitigation.

**3.10.4** Air pollution is a significant national and local public health issue and the policy seeks to protect the occupiers of development from exposure to air pollution while reducing the contribution of new development to air pollution problems.

#### What has changed?

Policy EN7 is simplified to refer to air quality, rather than itemise different types of air pollution.

In accordance with national policy (NPPF paragraph 181), the new policy incorporates more detailed wording on air quality. This wording also provides a policy response to the need for planning to assist in meeting national targets/limit values for air pollution.

Impacts on water quality and land stability issues, previously Policies EN8 and EN9, are subsumed within this policy.

### 3.11 Rural Development

#### Policy DM 36

##### Development in the Countryside

Outside of the urban area boundaries and rural settlement boundaries in the countryside, only the following types of development will be supported:

- a. new dwellings that accord with national policy on isolated new dwellings in the countryside, provided that, in the case of the re-use of a redundant or disused building, the building is worthy of retention, structurally sound and capable of conversion without substantial reconstruction;
- b. dwellings that are rural exception sites or entry level exception sites that meet the requirements of national policy and are adjacent to an existing settlement;
- c. agricultural workers' dwellings in accordance with Policy DM19;
- d. low carbon and renewable energy development in accordance with Policy DM25;

### 3 Development Management Policies

- e. the diversification of a viable farm holding<sup>(22)</sup>;
- f. the development, on sites adjacent to a village, of community facilities in accordance with Policy DM27;
- g. rural tourism and leisure facilities which respect the character of the countryside, including small-scale visitor accommodation;
- h. the creation of small-scale rural offices or the expansion of other existing rural-based businesses through conversion of existing buildings or new buildings;
- i. at the Science Museum, Wroughton, expansion of museum related activities and enabling development providing the benefits of the development are delivered sustainably and do not conflict with other policies of the Local Plan.

**3.11.1** The policy outlines those categories of development that are in principle considered acceptable in the countryside outside of settlement boundaries. References are made to applicable national policy and other policies of this plan. The policy accords with national policy on the types of development that should be supported in the countryside.

#### What has changed?

This is a new policy. Its purpose is to provide a clear statement of those categories of development that the plan supports on land outside of settlement boundaries. The policy incorporates Local Plan 2026 Policy EC5 on Farm Diversification. The policy reflects national policy on the types of development that should be permitted in the countryside.

22 where diversification refers to all activities other than farm work that have an economic impact on the holding. Provided that such activities make use of the farm's resources (such as the land, buildings or machinery) or products. If only the farm's labour force and no other resources are used for the activity then this is not classed as being a diversified activity. Agricultural work for other holdings is included. Exclusions are: pure financial investments; commercial activity on the holding which is not linked to any agricultural or horticultural activity (e.g. a hairdresser or insurance company); renting out the land for diverse activities where there is no further involvement in these activities; and letting out of buildings. Included in the definition are: contracting and haulage, including any agricultural contracting, haulage and clearing snow; tourism, which includes accommodation and sport/leisure activities; environment, which includes aquaculture and forestry; and processing and food manufacture, including animal or arable products (e.g. cheese-making), handicraft and wood processing.







### Appendix 1 - Public Open Space

The table below outlines the Council's open space requirements for new development for the purposes of Policy DM28 (Open Space in New Development), including quantity and accessibility standards. The table also provide a threshold for on-site provision and the basis on which off-site provision will be calculated. Costs per hectare for the different types of public open space are currently being prepared.

## Appendix 1 - Public Open Space

Type	Threshold for on-site provision	Quantity/ 1,000 people	Access standard	Cost/ ha <sup>1</sup>	5 year establishment maintenance cost/ha (2)	1-bed <sup>3</sup>	2-bed <sup>3</sup>	3-bed <sup>3</sup>	4+ bed <sup>3</sup>
Outdoor sports facilities including football, cricket, hockey, rugby, tennis, bowls, athletics	1,000+ dwellings <sup>4</sup>	1.6ha	N/A Borough-wide catchment						
Equipped designated children's and teenager's play areas to comprise Local level equipped play space (LLPS) and Neighbourhood level equipped play spaces (NLPS) also includes skateparks	75+ dwellings	0.3ha	250m for LLPS, 600m for NLPS <sup>5</sup>						
General recreation areas	20 + dwellings	1ha	400m						
Allotments	800+ dwellings	0.3ha	N/A Borough-wide catchment						



## Appendix 1 - Public Open Space

### Notes

1. Cost/ha is calculated at 2018 values. The cost will be adjusted annually using the Q4 BCIS All in Tender Prices Index.
2. Where it is proposed that public open space is to be maintained by a parish council, the Borough Council will seek that contributions are provided by the developer to the parish council to cover the cost of maintaining the public open space in the five years following its transfer until it is established. This contribution to establishment maintenance will also be sought where contributions towards off-site provision of public open space are proposed.
3. The contribution for a dwelling of each size is calculated using the price per hectare and the level of provision the occupants of that dwelling would require, calculated using the average occupancy by number of bedrooms data in Swindon Borough in the 2011 census (as set out in the table below).

Number of bedrooms	Mean number of occupants
1	1.30
2	1.90
3	2.46
4+	2.91

4. The policy of the Council is to seek provision of playing pitches in sports hubs which are of sufficient scale and quality to be sustainable as detailed below.
5. A neighbourhood level equipped place space has a catchment area of 600m. Within this area it will be unnecessary to provide a local level equipped play space.

### Specification for Local Level Equipped Play Space (LLPS)

1. Cannot be in the flood plain.
2. Has a minimum activity zone area of 625m<sup>2</sup> inclusive of play space set within a larger informal area of play to provide a total of 1521m<sup>2</sup>.
3. Caters for children from 2 to 8 yrs of age.
4. Has a buffer zone of not less than 10m in depth between the edge of the activity zone and the boundary of the nearest dwelling and a minimum of 20m between the activity zone and the habitable room façade of the dwelling. This zone should include planting to enable children to experience natural scent, colour and texture.
5. Should not have play equipment overlooking nearby back gardens.
6. Is positioned beside a pedestrian pathway on a well-used route.
7. Occupies a well-drained site with a grass or a hard surface and features an appropriate impact absorbing surface beneath and around the play equipment conforming to EN1177 (or any successor standard that replaces it).
8. Contains at least 5 types of play equipment, of which at least 2 are individual pieces, rather than part of a combination multi-play unit. Each type of play equipment should be designed to stimulate one of the following activities: balancing, rocking, climbing/agility, sliding, social play additional items may focus upon rotating, swinging, jumping, crawling, viewing, counting or touching.
9. The playground equipment must conform to EN1176 (or any successor standard that replaces it). Contains seating for parents and/or carers.
10. Contains a litter bin.
11. Has adequate space around the equipment to enable children to express their general exuberance and play games of 'tag' or 'chase'.

## Appendix 1 - Public Open Space

12. Where fencing is specified, it should be at least 1m in height around the perimeter of the activity zone, with two outward-opening, self-closing gates, on opposite sides of the play area, to deter entry by dogs and to restrict opportunities for bullying.
13. Has a sign indicating that the area is solely for use by children, adults are not allowed unless accompanied by children, dogs are excluded, smoking is prohibited (Better Places to Play 'We thank you for not smoking in our play park' sign), and displaying the name and telephone number of the operator of the facility to report any incident or damage to the play equipment.

### Specification for Neighbourhood Level equipped Play Space (NLPS)

1. Cannot be in the flood plain.
2. Provides all the requirements of a LLPS as set out above (usually in a defined separate area) plus activities for older children.
3. Has a minimum activity zone area of 1500m<sup>2</sup> that is divided into two parts: one containing a range of playground equipment and the other having a fenced hard surface multi-use games area of at least 465m<sup>2</sup> (the minimum area needed to play 5-a-side football).
4. Caters predominantly for older children.
5. Has a buffer zone of not less than 30m in depth between the activity zone and the boundary of the nearest dwelling. A greater distance may be needed where purpose-built skateboarding facilities are provided. This zone should include planting to enable children to experience natural scent, colour and texture.
6. Is positioned beside a pedestrian pathway on a well-used route. Is overlooked but integrated into wider amenity open space or is adjacent to other community facilities/uses.
7. Occupies a well-drained site with a grass or a hard surface and features an appropriate impact absorbing surface beneath and around the play equipment conforming to EN1177 (or any successor standard that replaces it).
8. Contains at least 8 types of play equipment comprising: at least 1 item to stimulate rocking, touch, social or developmental play among younger children; at least 2 items to facilitate sliding, swinging or moderate climbing; and at least 5 items to encourage either more adventurous climbing, single- point swinging, balancing, rotating or gliding (e.g. cableway).
9. At least 3 of these items should be individual play items rather than part of a combination multi-play unit. At least 3 items should provide for play for older children aged 8-12yrs.
10. Contains a well-drained grass area that is flat or gently sloping suitable for football and active games.
11. The playground equipment must conform to EN1176 (or any successor standard that replaces it).
12. Contains seating for parents and/or carers in the vicinity of the play equipment and other seating within the hard-surfaced games area.
13. Contains litter bins at each access point and in the proximity of each group of seats.
14. Has a convenient and secure parking facility for bicycles.
15. Has adequate space around the equipment to enable children to express their general exuberance and play games of 'tag' or 'chase'.
16. Where fencing is specified, it should be at least 1m height around the perimeter of the activity zone, with two outward-opening, self-closing gates, on opposite sides of the play area, to deter entry by dogs and to restrict opportunities for bullying.
17. Has a sign indicating that the area is solely for use by children, adults are not allowed unless accompanied by children, dogs are excluded, smoking is prohibited (Better Places to Play 'We thank you for not smoking in our play park' sign), and displaying the name and telephone number of the operator of the facility to report any incident or damage to the play equipment.

## Appendix 1 - Public Open Space

### Specification for General Recreational Areas

1. Does not include areas into which people do not frequently go or which are non-functional for passive recreation such as drainage features, riverbanks, areas of buffer planting or road verges or verges alongside footpaths.
2. Is provided as a coherent inviting space with an overall landscape design that provides for informal play and passive recreation.
3. Does not constitute 'scraps' or fragments of land left over after the planning of residential development.
4. The space can include local level or neighbourhood level equipped play space for children and/or outdoor gym equipment for adults.
5. Seating should be provided.
6. Adjacent buildings must front onto and overlook the open space.
7. The general recreational space should be provided in an accessible location, at a node of principal pedestrian routes, to maximise the number of houses than can access it.
8. Larger amenity open spaces should, where possible be integrated into the wider green infrastructure network.
9. In larger developments, co-locating amenity open spaces adjacent to schools and local centres will be encouraged.

### Specification for Allotments

1. The Council will seek half plot allotments with an area of 125m<sup>2</sup>. The Council's experience is that sites of 20-40 half-plots provide sufficient economies of scale while not becoming so big as to be difficult to manage.
2. Allotments should be well-connected to adjacent open space uses and accessible from across a development. Each allotment site should be delivered to the following specification:

#### *Size and layout:*

3. Plot sizes of 14x9m (metric equivalent of half a traditional plot).
4. Stone dust path down centre of allotment capable of taking fully loaded tractor and trailer – i.e. to light commercial vehicle standard with a turning head to take the manoeuvring of a vehicle with trailer.
5. Paths between plots 1.5m wide to allow for disabled access.
6. Grass path down centre of each plot - paths within plots to be circa 600mm wide. *(Note items 4 and 5 above (plus 15-17 below) are in addition to the area required in item 3)*

#### *Boundaries and security:*

7. 2.4m high weld mesh security fence.
8. Lockable access gates.
9. Where hedges are required to screen prominent boundaries a 3m wayleave/clearance surround is to be provided to allow for tractor sidearm access for hedge maintenance.
10. Allow 2m width for hedge at maturity.
11. 1.5m grass surround allowed to maintain boundary fence (where no hedge).

#### *Utilities:*

12. The site should be served by a water supply ready to connect at the gate, and the water supply connects to appropriately located troughs.
13. Water tank per every 6 plots with a water point for every plot.
14. Sewerage and electricity to be provided to the boundary of the site.



## Appendix 1 - Public Open Space

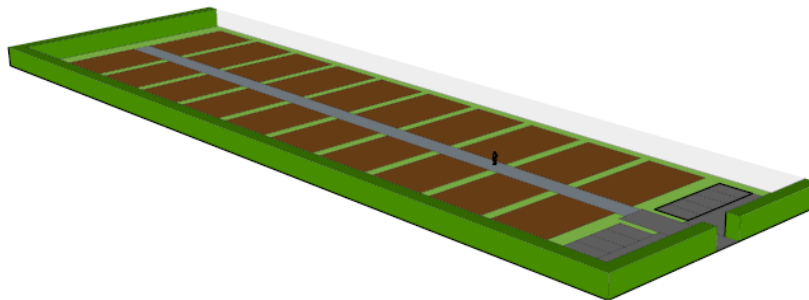
### *Additional facilities:*

15. Car parking – provision to comply with current policy. 5x2.5m bays plus manoeuvre space for vehicle with trailers, tarmac surface.
16. Hard surfaced shared space as part of the car park for a future communal shed or club-house.
17. A hard surfaced area close to the main vehicular entrance to allow for deliveries etc. with space for a future communal shed or club-house and community notice board.

### *Siting and quality:*

18. Should be easily accessible to future residents of development.
19. Situated on open land which is not overshadowed by trees/hedgerows or built structures.
20. Oriented to maximise sunlight and minimise overshadowing.
21. Situated outside of flood zone and above the water table.
22. The standard of soil of the site should be of good quality top soil to a reasonable depth, not compacted and free of debris or any contaminants.
23. The soil would need testing prior to use.

### *Indicative drawing for a 20 half-size plot:*



### **Specification for Sport Pitches**

1. Facilities should be laid out and specified to conform to Sport England's Active Design principles – <https://www.sportengland.org/facilities-planning/design-and-cost-guidance/natural-turf-for-sport/>
2. Pitches should be of sufficient size in line with Sport England standards: <http://www.sportengland.org/media/981150/comparative-sizes-outdoor.pdf>. Adult pitch sizes including run off and space for officials should be as follows:
  - Football – 106m x 70m
  - Rugby league – 116m x 74m
  - Rugby union 154m x 80m

## Appendix 1 - Public Open Space

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3. Pitches should be suitable for year round use and meet Sport England performance standards: <http://www.sportengland.org/media/30865/Natural-turf-for-sport.pdf> (see appendix 4, Performance Quality Standards in particular)
4. Natural turf pitches should as a minimum be constructed to conform to Sport England's Natural turf for Sport type 1 construction: <https://www.sportengland.org/facilities-planning/design-and-cost-guidance/natural-turf-for-sport/>
5. Artificial surfaces (artificial grass pitches) should as a minimum be selected and constructed in accordance with Sport England's 'Artificial Surfaces for Outdoor Sports' guidance: <https://www.sportengland.org/facilities-planning/design-and-cost-guidance/artificial-sports-surfaces/>

This Swindon Borough Council Local Plan Review Issues and Options Paper may be viewed or downloaded from our website <https://swindon-consult.objective.co.uk/portal/>

Copies of this document may be purchased from Swindon Borough Council.  
To request a copy, please either:

**Write to:** Planning Policy, Swindon Borough Council, Wat Tyler West, Beckhampton Street, Swindon SN1 2JG

**E-mail:** [forwardplanning@swindon.gov.uk](mailto:forwardplanning@swindon.gov.uk)

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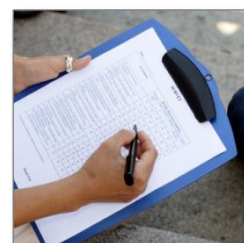
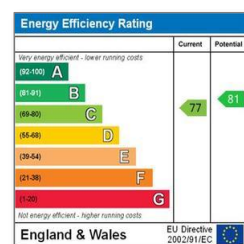




# Swindon Borough Council & Wiltshire Council Local Housing Needs Assessment 2019

## Report of Findings

April 2019





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# 1. Introducing the Study

## Background to the project and wider policy context

### Introduction

- 1.1 Opinion Research Services (ORS) was commissioned by Wiltshire Council and Swindon Borough Council to prepare a Local Housing Needs Assessment (LHNA) to identify the minimum Local Housing Need (LHN) for the local planning authority areas using the standard method set out in Planning Practice Guidance (PPG); and to establish the distribution between the Housing Market Areas (HMAs) within the combined area. The study also considers the possible justification for any increase to the minimum LHN figure for plan-making purposes. This LHNA adheres to the requirements of the new National Planning Policy Framework (NPPF) published in July 2018 (and updated in February 2019) and the associated Planning Practice Guidance (PPG), in particular the section on housing and economic needs assessment.
- 1.2 This study updates the previous Swindon and Wiltshire Strategic Housing Market Assessment (SHMA) prepared by ORS and published in June 2017. This concluded an overall housing need of 73,000 dwellings for the combined area over the 20-year period 2016-36. Work for the 2017 SHMA was undertaken between 2015 and 2016 and the analysis was informed by the 2012-based household and population projections, which was the most up-to-date data available at the time that the analysis was prepared.
- 1.3 Since the publication of the 2017 SHMA report, there have been significant changes to Government policy and new data has also been published. Analysis within the 2017 SHMA will continue to provide useful evidence as much of the data relates to structural trends (such as an aging population) which are likely to continue; however, it is now appropriate to review the Housing Need for Swindon Borough and Wiltshire based on more up-to-date evidence using analysis that reflects current national policy.
- 1.4 This LHNA considers how Local Housing Needs relate to the needs of different Housing Market Areas and considers the relationship between the minimum LHN (based on the standard method set out in PPG) and the forecast employment growth that was identified by the 2017 Economic Development Needs Assessment (EDNA) for Swindon and Wiltshire that was prepared by Hardisty Jones Associates (HJA). The analysis identifies how the employment growth that was identified by that study might influence the scale and distribution of housing growth that the Councils plan for the study area, considering the possible justification for increasing the housing requirement beyond the minimum LHN.

## Government Policy

- 1.5 The Government published the National Policy Planning Framework (the Original NPPF) in 2012. This set out the planning policies for England and how these were expected to be applied.
- 1.6 The Original NPPF had a presumption in favour of sustainable development, and paragraph 47 stated that Local Plans should meet *“the full, objectively assessed needs for market and affordable housing in the housing market area”*. The responsibility for establishing housing need rested with the local planning authority and Paragraph 159 of the Original NPPF set out that they *“should prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries”*.
- 1.7 A revised version of the National Policy Planning Framework (the Revised NPPF) was published in July 2018. Whilst the Revised NPPF maintains the underlying theme of sustainable development, several significant changes have been introduced in relation to identifying and meeting housing needs. The Revised NPPF was updated in February 2019 to incorporate a number of detailed changes following a technical consultation. Whilst most of the changes appear relatively minor, they may have a substantial impact on identifying and meeting housing needs in some areas. The results of the consultation were summarised in the document *“Government response to the technical consultation on updates to national planning policy and guidance”*.
- 1.8 Under the Revised NPPF, local planning authorities are still responsible for assessing their local housing needs; however, Paragraph 60 identifies that *“strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach”*. This represents a significant change, as the standard method sets out a formulaic approach to determine the minimum Local Housing Need (LHN) figure and prescribes the use of specific data for the calculation. Therefore, whilst the responsibility for establishing housing need continues to rest with the local planning authority, this is now constrained to a minimum figure that is determined centrally by the Government.
- 1.9 Local planning authorities no longer have to prepare a Strategic Housing Market Assessment (SHMA) for the Housing Market Area (HMA), but they are now expected to produce a Local Housing Need Assessment (LHNA) for their local area in order to assess the size, type and tenure of housing needed for different groups in the community.
- 1.10 This focus on local area has led to a change in the Duty to Cooperate, where neighbouring authorities now have to produce Statements of Common Ground. Whilst HMAs are no longer mentioned explicitly in the Revised NPPF, Paragraph 60 identifies that *“any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for”*; and PPG identifies that HMAs are still one of the factors which must be considered when determining the relevant cross-boundary areas for plan-making [ID 61-010-20180913].
- 1.11 The Revised NPPF has also introduced a new definition for affordable housing. Whilst the Original NPPF identified in the Glossary at Annex 2 that affordable housing should be provided for households *“whose needs are not met by the market”*, the Revised NPPF adds that this includes *“housing that provides a subsidised route to home ownership and/or is for essential local workers”*. This has led to a specific change in the Planning Practice Guidance (PPG) for assessing affordable housing need.
- 1.12 Under the Original NPPF, the need for affordable housing was based on those who could not afford to either buy or rent in the market – so households able to afford market rent would not be counted as part of the

affordable housing need, even if they could not afford homeownership. However, the latest PPG states that assessments must now include the needs of “those that cannot afford their own homes, either to rent, or to own, where that is their aspiration” [ID 2a-020-20190220]. On this basis, the needs of households able to afford market rent who aspire to but are unable to afford homeownership must now be counted.

## The Standard Method for Local Housing Need Assessment

- <sup>1.13</sup> The Original NPPF and associated PPG set out a methodology for establishing an Objectively Assessed Need for housing in a defined HMA. This methodology required that “Household projections published by the Department for Communities and Local Government should provide the starting point estimate of overall housing need”, but allowed for adjustment based on local factors: “The household projection-based estimate of housing need may require adjustment to reflect factors affecting local demography and household formation rates which are not captured in past trends.” Adjustments could therefore be made if there were concerns around the quality of local data (e.g. inaccurate migration estimates), along with evidence-based judgements on other need adjustments such as market signals uplift and alignment of jobs and workers based on local circumstances.
- <sup>1.14</sup> On 14 September 2017, the Department of Communities and Local Government (CLG) published a consultation on potential revisions to the NPPF, including a standardised methodology for calculating the Local Housing Needs (LHN). This included a number of key proposals.

- » The starting point for calculating the LHN for any area should be the most up to date household projections published by CLG;
- » While, deviation from this starting point can be considered, the consultation proposals note that; There should be very limited grounds for adopting an alternative method which results in a lower need; and
- » The household projections published by CLG should be uplifted by a fixed affordability relationship based upon the ratio of house prices to earnings. The maximum uplift for a local authority area will be 40% above its CLG household projections or current Local plan housing target.

- <sup>1.15</sup> CLG produced a spreadsheet of indicative housing needs figures which covered every local authority area in England based on the most up to date data at the time, the 2014 based household projections.
- <sup>1.16</sup> The Revised NPPF confirms that planning authorities should use the standard methodology for plan-making, though alternative methodologies which result in a higher housing need figure may still be deemed appropriate. Therefore, the standard method identifies the minimum number of homes expected to be planned for. It does not produce a housing requirement figure. The LHN figure represents a minimum overall housing need, but local authorities can consider a higher figure for plan making if, for example, this reflects growth potential, or unmet need from elsewhere.



- 1.17 This is confirmed by the PPG on housing and economic needs assessment, which states:

***When might it be appropriate to plan for a higher housing need figure than the standard method indicates?***

*The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.*

*This will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan). Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:*

- » *growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);*
- » *strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or*
- » *an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;*

*There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests.*

***Paragraph: 010 Reference ID: 2a-010-20190220***

- 1.18 PPG also suggests that local planning authorities will need to calculate their local housing need figure at the start of the plan-making process but that this number should be kept under review and revised where appropriate.
- 1.19 The housing need figure may change as the inputs are variable and this should be taken into consideration. It may therefore be prudent to consider a number that is higher than the minimum LHN to provide a buffer against possible future changes when testing different alternatives while reviewing local plans.

## Changes to the Standard Method

- 1.20 Since the publication of the figures in September 2017 a range of new data has been released which allows for the calculation to be updated. This includes:
- » New affordability data released in March 2018;
  - » New 2016-based sub-national population projections (SNPP) released in May 2018;
  - » A new methodology for calculating household projections released by the Office for National Statistics in June 2018; and
  - » New 2016-based household projections released in September 2018.

- 1.21 The national housing need produced using these new data is lower than previous estimates, falling short of the Governments stated 300,000 dwelling per year target. As a consequence, the Ministry for Housing, Communities and Local Government (MHCLG) consulted on changes to the standard method approach, and on 26 October 2018 published “Technical consultation on updates to national planning policy and guidance October 2018”.
- 1.22 At paragraph 19 of the document, MHCLG set out their planned changes to the standard method, explicitly stating that the lower housing numbers that are derived from application of the standard method to the ONS produced 2016-based household projections should not be used, and that these do not qualify as an exceptional circumstance to warrant deviation from the standard method outputs using the CLG 2014-based projections:

*19. The Government considers that the best way of responding to the new ONS household projections and delivering on the three principles in paragraph 18 above is to make three changes:*

- » *1. For the short-term, to specify that the 2014-based data will provide the demographic baseline for assessment of local housing need.*
- » *2. To make clear in national planning practice guidance that lower numbers through the 2016-based projections do not qualify as an exceptional circumstance that justifies a departure from the standard methodology; and*
- » *3. In the longer term, to review the formula with a view to establishing a new method that meets the principles in paragraph 18 above by the time the next projections are issued.*

- 1.23 Following on from this general context, the consultation asked the following specific questions:

**Question 1**

*Do you agree that planning practice guidance should be amended to specify that 2014- based projections will provide the demographic baseline for the standard method for a time limited period?*

**Question 2**

*Do you agree with the proposed approach to not allowing 2016-based household projections to be used as a reason to justify lower housing need?*

- 1.24 After considering the consultation responses received, the “Government response to the technical consultation on updates to national planning policy and guidance” was published on 19 February 2019.
- 1.25 Despite a majority of consultees disagreeing with the proposal at Question 1, the Government still considers that its proposed approach is the most appropriate in the short-term.

#### **Government response to Question 1**

*Having taken the responses into account, the Government considers that its proposed approach to providing the demographic baseline for the standard method is the most appropriate approach for providing stability and certainty to the planning system in the short-term. This decision has been taken in the context that the standard method does not represent a mandatory target for local authorities to plan for, but the starting point for the planning process. Local planning authorities may decide that exceptional circumstances justify the use of an alternative method, but they will need to identify these reasons and can expect them to be tested by the Planning Inspectorate during the examination of their plans. Local authorities may also not be able to meet their identified housing need in full, for example because of land constraints (such as Green Belt) in their area and it may be that need is better met elsewhere. The proposed approach does not change this.*

- 1.26 On this basis, it would appear that any deviation from the standard methodology should only be considered if exceptional circumstances can be demonstrated. Nevertheless, the revisions to PPG [ID 2a-015-20190220] clarify that an alternative approach that identifies a need higher than using the standard method will be considered sound, providing that it adequately reflects current and future demographic trends and market signals, given that it will have exceeded the minimum starting point. It is only where a figure that is lower than that identified using the standard method will need to be justified through exceptional local circumstances.
- 1.27 The Government’s response goes on to say:

*Over the next 18 months we will review the formula and the way it is set using National Statistics data with a view to establish a new approach that balances the need for clarity, simplicity and transparency for local communities with the Government’s aspirations for the housing market.*

*A key consideration of the standard method is to provide a degree of continuity between assessments of housing need over time. The changes to underlying assumptions in the population projections and methodological improvements to the household projections had led to significant variations in housing need at a local level, something that needs addressing in the short term.*

- 1.28 The end of the 18-month period that the Government cites (August 2020) will be shortly after the release of the 2018-based Sub National Population Projections which are likely to be published in May 2020, and likely to coincide with the publication of the associated 2018-based Household Projections.<sup>1</sup>

<sup>1</sup> National population projections are published every two years, with the 2018-based projections expected to be released around October 2019. Sub National Population Projections usually follow approximately 6 months later, and household projections later that same year. The 2016-based SNPP was released in May 2018, and the 2016-based household projections were released in September 2018.



- 1.29 The Government has made it clear that it does not doubt the accuracy of the ONS 2016-based projections, as stated in the consultation: *“the Government is clear that this does not mean that it doubts the methodological basis of the 2016-based household projections.”* (again from the Question 1 response).
- 1.30 However, in its response to Question 2, the Government has made it clear that the existence of the lower 2016-based projections is not a justification for a lower local housing need assessment, despite further disagreement from respondents to the consultation.

**Government response to Question 2**

*Taking into account these responses, the Government continues to think that the 2016-based household projections should not be used as a reason to justify lower housing need. We understand respondents' concerns about not using the latest evidence, but for the reasons set out in the consultation document we consider the consultation proposals to be the most appropriate approach in the short-term. We are specifying in planning guidance that using the 2016-based household projections will not be considered to be an exceptional circumstance that justifies identifying minimum need levels lower than those identified by the standard method.*

- 1.31 It seems likely that the concerns about not using the latest evidence will ultimately be tested in the courts. Whilst there are some uncertainties about the new method for calculating household formation that ONS has introduced for the 2016-based household projections, the 2016-based sub national population projections are based on a method that is largely consistent with that used for the 2014-based population projection but using more up-to-date data and based on improved mid-year population estimates. As part of the 2016-based household projections publication, the ONS included an output which applied the previous CLG 2014-based household formation rates to the new 2016-based population projection (variant output 2) which provides up-to-date figures using the previous method.
- 1.32 It is also notable that the ONS intends to publish variant outputs for the 2016-based sub-national population projections in April 2019, and has recently consulted users on possible variants to the household projections. It seems likely that comparable variant scenarios will be included as part of the 2018-based projections which will enable the Government to propose an alternative scenario when the standard method is fully revised.

## Assessing Housing Needs

- 1.33 The Revised NPPF no longer requires local planning authorities to produce an SHMA to establish housing need for HMAs, but instead requires local planning authorities:

*60. To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.*

*61. Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes.*

*62. Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required, and expect it to be met on-site unless:*

- a) off-site provision or an appropriate financial contribution in lieu can be robustly justified; and*
- b) the agreed approach contributes to the objective of creating mixed and balanced communities*

**National Planning Policy Framework 2019 (NPPF), paragraph 60-62**

- 1.34 Therefore, the new NPPF does not contain any explicit reference to SHMAs and housing needs are to be established at a local authority level. However, a Local Housing Needs Assessment (LHNA) must now be prepared which will establish a minimum Local Housing Need (LHN) figure using the standard method set out in PPG [ID 2a-004-20190220]. In addition, the LHNA will need to identify the size, type and tenure of housing needed for a range of different groups in the community, which is largely consistent with the scope for SHMAs that the Original NPPF identified.
- 1.35 However, whilst the Original NPPF expected SHMAs to be undertaken to assess needs across Housing Market Areas (HMAs), the focus of the Revised NPPF is on the needs of individual Local Planning Authorities without any mention of HMAs. Nevertheless, in terms of plan-making, PPG has retained the concept of the HMA [ID 61-010-20180913] within the Duty to Co-operate context, where joint working continues to be required.

## Duty to Co-operate

- 1.36 The Duty to Co-operate was introduced in the 2011 Localism Act and is a legal obligation.
- 1.37 The NPPF sets out an expectation that public bodies will co-operate with others on issues with any cross-boundary impact, in particular in relation to strategic priorities such as *“the homes and jobs needed in the area”*.

**Maintaining effective cooperation**

*24. Local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries.*

*25. Strategic policy-making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans. They should also engage with their local communities and relevant bodies including Local Enterprise Partnerships, Local Nature Partnerships, the Marine Management Organisation, county councils, infrastructure providers, elected Mayors and combined authorities (in cases where Mayors or combined authorities do not have plan-making powers).*

*26. Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.*

*27. In order to demonstrate effective and on-going joint working, strategic policymaking authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. These should be produced using the approach set out in national planning guidance, and be made publicly available throughout the plan-making process to provide transparency.*

**National Planning Policy Framework (NPPF 2018), paragraphs 24-27**

- 1.38 The manner in which councils have complied with their legal requirements under the Duty to Co-operate will be considered when plans are submitted for examination. One key issue is how any unmet development and infrastructure requirements can be provided by co-operating with adjoining authorities (subject to tests of reasonableness and sustainability).
- 1.39 The PPG elaborates further on the requirement for a statement of common ground (in the section on Plan-Making, updated 13 September 2018):

**Maintaining effective cooperation**

*How are plan-making bodies expected to cooperate?*

*Strategic policy-making authorities are required to cooperate with each other, and other bodies, when preparing, or supporting the preparation of policies which address strategic matters. This includes those policies contained in local plans (including minerals and waste plans), spatial development strategies, and marine plans.*

*The National Planning Policy Framework sets out that these authorities should produce, maintain, and update one or more statement(s) of common ground, throughout the plan-making process. Local planning authorities are also bound by the statutory duty to cooperate. Neighbourhood Planning bodies are not bound by the duty to cooperate, nor are they required to produce or be involved in a statement of common ground.*

**Paragraph: 001 Reference ID: 61-001-20180913**

- 1.40 In paragraph 61-009 entitled “Which geographical area does a statement of common ground need to cover?”, PPG explicitly discusses the appropriate functional geography to which the Statement of Common ground should apply: “For example housing market and travel to work areas, river catchments, or landscape areas



may be a more appropriate basis on which to plan than individual local planning authority, county, or combined authority areas.”. It goes on to define housing market areas:

#### **How can housing market areas be defined?**

*A housing market area is a geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work. These can be broadly defined by analysing:*

*The relationship between housing demand and supply across different locations, using house prices and rates of change in house prices. This should identify areas which have clearly different price levels compared to surrounding areas.*

*Migration flow and housing search patterns. This can help identify the extent to which people move house within an area, in particular where a relatively high proportion of short household moves are contained, (due to connections to families, jobs, and schools).*

*Contextual data such as travel to work areas, retail and school catchment areas. These can provide information about the areas within which people move without changing other aspects of their lives (e.g. work or service use).*

*Suggested data sources: Office for National Statistics (internal migration and travel to work areas statistics); Land Registry House Price Index and Price Paid data (including sales); data from estate agents and local newspapers about geographical coverage of houses advertised for sale and rent; Ministry of Housing, Communities and Local Government statistics including live tables on affordability (lower quartile house prices/lower quartile earnings); and neighbourhood data from the Census.*

**Paragraph: 010 Reference ID: 61-010-20180913**

<sup>1.41</sup> This definition of a HMA is almost identical to that in the original PPG relating to housing need.

## 2. Local Housing Need

### Establishing the Minimum Local Housing Need figure

#### Local Housing Need based on standard methodology

- 2.1 The NPPF confirms that planning authorities should normally use the standard methodology to establish a minimum Local Housing Need (LHN) figure.
- 2.2 Using the process set out in Planning Practice Guidance for Housing Need Assessment [ID 2a-004-20190220] the minimum annual Local Housing Need figure in 2018 can be established as follows.

#### **SWINDON BOROUGH**

##### **Step 1 – Setting the baseline**

- » The PPG states that the CLG 2014-based household projections should be used to set the baseline household growth for the local authority area over a 10-year period.
- » These projections identify 96,368 households for Swindon Borough at the start of the current year (2019/20) increasing to 104,846 households over the 10-year period to 2029.
- » This yields an overall increase of 8,478 households over 10 years, equivalent to a projected average annual household growth of 848 households per year.

##### **Step 2 – An adjustment to take account of affordability**

- » The most recent ONS median workplace-based affordability ratio is 7.62 for Swindon Borough, which is the ratio for the previous calendar year (2018).
- » The adjustment factor can therefore be derived as follows:

$$\text{Adjustment factor} = \left( \frac{7.62 - 4}{4} \right) \times 0.25 = 0.905 \times 0.25 = 22.63\%$$

- » Applying an uplift of 22.63% to the annual household growth of 666 households per year yields an annual housing need of 1,040 dwellings.

##### **Step 3 – Capping the level of any increase**

- » The most recent strategic policies for housing were adopted on 26 March 2015 which is less than 5 years ago and therefore the local housing need figure is capped whichever is the lower of:
  - a. the uncapped LHN figure identified in step 2 = 1,040 per year; or
  - b. the average annual housing requirement figure set out in the most recently adopted strategic policies (1,467 per year) with a 40% uplift applied = 2,054.
- » The lower of these is the uncapped LHN figure (1,040 per year) and therefore the increase is not capped.
- » **The minimum Local Housing Needs figure for Swindon Borough in 2019/20 is 1,040 dwellings per year.**

## WILTSHIRE

### Step 1 – Setting the baseline

- » The PPG states that the CLG 2014-based household projections should be used to set the baseline household growth for the local authority area over a 10-year period.
- » These projections identify 212,190 households for Wiltshire at the start of the current year (2019/20) increasing to 227,162 households over the 10-year period to 2029.
- » This yields an overall increase of 14,972 households over 10 years, equivalent to a projected average annual household growth of 1,497 households per year.

### Step 2 – An adjustment to take account of affordability

- » The most recent ONS median workplace-based affordability ratio is 9.82 for Wiltshire, which is the ratio for the previous calendar year (2018).
- » The adjustment factor can therefore be derived as follows:

$$\text{Adjustment factor} = \left( \frac{9.82 - 4}{4} \right) \times 0.25 = 1.455 \times 0.25 = 36.38\%$$

- » Applying an uplift of 36.38% to the annual household growth of 1,497 households per year yields an annual housing need of 2,042 dwellings.

### Step 3 – Capping the level of any increase

- » The most recent strategic policies for housing were adopted on 20 January 2015 which is less than 5 years ago and therefore the local housing need figure is capped whichever is the lower of:
  - a. the uncapped LHN figure identified in step 2 = 2,042 per year; or
  - b. the average annual housing requirement figure set out in the most recently adopted strategic policies (2,100 per year) with a 40% uplift applied = 2,940.
- » The lower of these is the uncapped LHN figure (2,042 per year) and therefore the increase is not capped.
- » **The minimum Local Housing Needs figure for Wiltshire in 2019/20 is 2,042 dwellings per year.**

<sup>2.3</sup> **Based on these calculations, this Local Housing Need Assessment uses a minimum Local Housing Need figure of 1,040 dwellings per year for Swindon Borough and 2,042 dwellings per year for Wiltshire.**

<sup>2.4</sup> However, the Government has confirmed that it intends to comprehensively review the standard method over the next 18 months, so it may be necessary to update the LHNA if the Government chooses to adopt a different approach following the proposed review of the formula.



## Disaggregating the minimum Local Housing Need figure

- 2.5 The minimum LHN figure for Swindon in 2019/20 is 1,040 dwellings per year. This yields an overall minimum housing need of 20,800 dwellings over the 20-year Local Plan period 2016-2036.
- 2.6 The minimum LHN figure for Wiltshire in 2019/20 is 2,042 dwellings per year. This yields an overall minimum housing need of 40,840 dwellings over the 20-year Local Plan period 2016-2036.
- 2.7 Whilst the LHN figures are informed by the trend-based household projections, the affordability adjustment means that the number of dwellings is higher than the household projection-based estimate of housing need. This increase is designed to help respond to housing market pressures which may have suppressed past rates of household formation.
- 2.8 Figure 1 sets out the separate elements that will contribute to the LHN. These include:
- » Households growth over the 20-year plan period based on trend-based projections;
  - » Institutional population growth over the 20-year plan period needing communal accommodation that will be counted within the housing supply;
  - » Dwellings without a usually resident household (either vacant homes or second homes);
  - » Additional dwellings to respond to housing market pressure.

**Figure 1: Elements of housing need (Source: CLG, ORS; Note: All figures presented unrounded for transparency)**

Element of Housing Need	SWINDON BOROUGH		WILTSHIRE UA	
	Calculation	Housing Need (dwellings)	Calculation	Housing Need (dwellings)
Projected household growth over the 20-year period 2016-2036	110,569 - 93,540 = <b>17,029 households</b>	17,582	236,616 - 206,210 = <b>30,406 households</b>	31,651
Projected institutional population growth over the 20-year period 2016-2036; equivalised using average number of adults per household <sup>2</sup>	2,205 - 1,380 = 825 persons 825 ÷ 1.819 = <b>454 households</b>	469	16,463 - 13,427 = 3,036 persons 3,036 ÷ 1.830 = <b>1,659 households</b>	1,727
<b>20-year housing need based on the Standard Method calculation</b>	<b>1,040 x 20 = 20,800 dwellings</b>	<b>20,800</b>	<b>2,042 x 20 = 40,840 dwellings</b>	<b>40,840</b>
Uplift for housing market pressures enabling more households to form than projected by the trend-based projections	20,800 - 17,582 - 469 = <b>2,749 dwellings</b>	2,749	40,840 - 31,651 - 1,727 = <b>7,462 dwellings</b>	7,462

- 2.9 On this basis, we can conclude that the LHN figure for Swindon in 2019/20 incorporates an uplift of 2,749 dwellings, which will provide housing for 2,663 households in addition to the trend-based projection of 17,029 households over the period 2016-36, equivalent to an increase of 15.6%; whilst the LHN for Wiltshire in 2019/20 incorporates an uplift of 7,462 dwellings, which will provide housing for 7,168 households in addition to the trend-based projection of 30,406 households over the same period, equivalent to an increase of 23.6%.

<sup>2</sup> Based on the Census data referenced by PPG ID 3-043

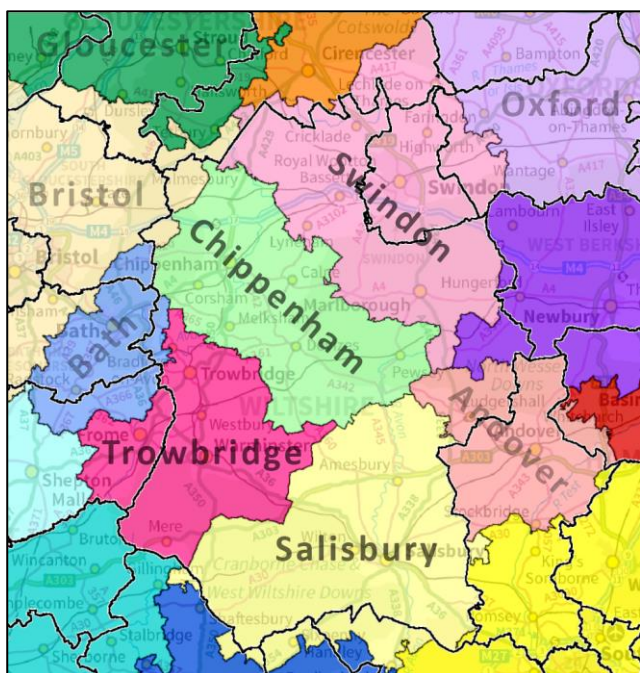
# 3. Housing Market Areas

## Establishing the distribution of Local Housing Need

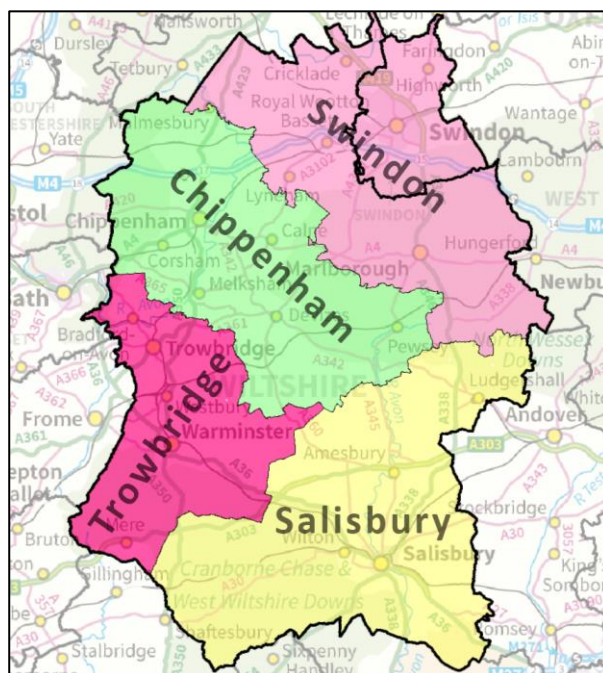
### Functional Housing Market Areas

- 3.1 In terms of strategic housing, the current Wiltshire Core Strategy considers indicative housing requirements on a Community Area basis. These areas are also used by the Council in relation to other services it delivers. Each Community Area comprises a group of parishes centred around at least one market town. However, the NPPF introduced the need to establish Housing Market Areas (HMAs) for assessing housing need.
- 3.2 On this basis, the first key objective of the 2017 SHMA was to identify and define functional HMAs covered by the two local authorities; and the Volume 1 report set out the evidence-based approach taken to establishing the most appropriate HMAs for Swindon and Wiltshire and their surrounding areas. The methodology for identifying functional HMAs was based on secondary data, and for an extended area surrounding Swindon and Wiltshire the 2017 SHMA sought to:
- » Review the conclusions of existing studies undertaken to identify HMAs in and around the area;
  - » Analyse the functional linkages between places where people live and work;
  - » Consider household migration and house prices;
  - » Identify an evidence based geography of functional HMAs that are not constrained to administrative boundaries; and
  - » Establish the most appropriate geographies for assessing overall housing need.
- 3.3 Figure 2 illustrates the functional HMAs that the SHMA identified without any constraint to administrative boundaries. Figure 3 illustrates the “best fit” HMAs that were proposed for dividing the Swindon and Wiltshire study area into four separate geographies for assessing overall housing need.

**Figure 2: Functional HMAs with LA Boundaries**

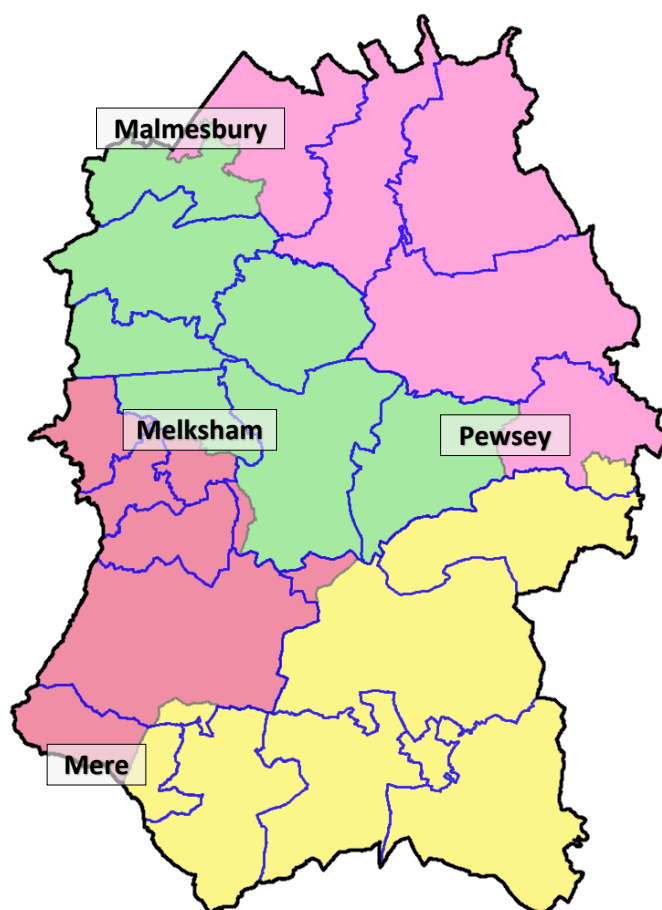


**Figure 3: Original 'Best Fit' HMAs with LA Boundaries**



- 3.4 These areas were constrained to the administrative boundary of the combined area, and parts of the administrative area that were covered by other functional HMAs (such as Andover, Bath and Bristol) were reallocated to the proposed “best fit” HMAs based on the strength of the functional relationships. However, the internal boundaries were not changed from those identified for the original functional areas. This led to some practical difficulties, as these boundaries cut across other recognised geographies that are routinely used by Wiltshire Council – for example, parishes and community areas. The issue was particularly problematic in the area around Malmesbury, where the eastern part of the town was in Swindon HMA whilst the western part of the town was in Chippenham HMA.
- 3.5 As a consequence, the Council refined the “best fit” HMAs that were identified by the 2017 SHMA using parishes as the basic building block, to ensure alignment between the “best fit” HMA and parish boundaries. These refined areas have provided the basis for monitoring housing land supply in Wiltshire for the purpose of informing the local plan review since the publication of the SHMA. Nevertheless, even when aligned to parish boundaries, there remain some anomalies from a planning perspective. For example, whilst the whole of Malmesbury town was associated with the Chippenham HMA, some of the surrounding rural parishes remained in the Swindon HMA; and the issue of ‘split’ Community Areas was raised in responses to the Councils’ Regulation 18 consultation in 2017.
- 3.6 Given the practical plan-making difficulties arising from aligning “best fit” HMAs to parish boundaries and the associated consultation responses, it is considered that it would be appropriate to align the HMAs using “best fit” to the Community Areas as the basic building block as far as possible, in order to avoid market towns and their rural hinterlands being divided between different HMAs.

**Figure 4: Parish-based ‘Best Fit’ HMAs within Wiltshire with Community Area Boundaries (Note: Shaded zones show functional HMAs with “best fit” to parishes; solid blue lines show Community Area boundaries with selected areas labelled)**





- 3.7 It is evident that the majority of the Community Areas are contained entirely within an individual HMA, based on the “best fit” to parish boundaries that are currently being used. A small number of Community Areas have one or two parishes that fall in a separate HMA to the remainder of parishes within the area, and it is possible to identify relatively straightforward adjustments to the HMA boundaries to reconcile these anomalies.
- 3.8 Nevertheless, there are a four Community Areas which are clearly divided between two or more different HMAs.

## Malmesbury

- 3.9 As previously noted, the boundary between the Chippenham and Swindon HMAs around Malmesbury has caused some difficulty from a planning perspective, for even when aligned to parish boundaries the two HMAs divide the place. Given this context, it is perhaps not surprising that the Community Area centred on Malmesbury is also divided between the Chippenham and Swindon HMAs.
- 3.10 Considering the data, the Community Area population is divided with a 60:40 split between Swindon and Chippenham HMA. On this basis, it would seem appropriate to conclude that Malmesbury Community Area should be included as part of the “Best Fit” to Swindon HMA. However, the majority of the population in Malmesbury town is resident in Chippenham HMA – so there is also argument that the area should be included as part of the “Best Fit” to Chippenham HMA.
- 3.11 When considering the Valuation Office Agency (VOA) Broad Rental Market Areas (BRMAs), we can establish that two thirds (67%) of the population live in the West Wiltshire BRMA, with over a quarter (26%) in the Cheltenham BRMA and only 7% in the Swindon BRMA. In other words, the VOA consider this area to be separate from Swindon in terms of local rents, and when considering local services the Rent Officer has concluded that it wouldn’t be reasonable to expect residents to move to Swindon to find a suitable home. Given this context, it would seem inappropriate to include this area as part of the “Best Fit” to Swindon HMA.
- 3.12 In terms of commuting, there is a larger proportion of workers resident in the Malmesbury Community Area commuting out of the area to jobs in Swindon HMA (61%) than Chippenham HMA (32%) (the remaining 7% commute to jobs elsewhere). However, whilst many workers commute to jobs in Swindon HMA this represents only a relatively small proportion of the total number of commuters to that area; whereas the smaller number of commuters with jobs in Chippenham HMA represent a much larger proportion of all commuters to that area. In other words, Malmesbury is more important in providing workers for Chippenham’s workforce than it is in providing workers for Swindon Borough’s workforce, so the functional relationship between Malmesbury and Chippenham is arguably stronger than the relationship between Malmesbury and Swindon. On this basis, it could be more appropriate to include Malmesbury Community Area as part of the “Best Fit” to Chippenham HMA.
- 3.13 Taking everything into account, it is clear that Malmesbury Community Area is divided; but on balance, the more appropriate “Best Fit” would appear to be with the Chippenham HMA given that Malmesbury town falls predominantly within that area; the Rent Officer considers the area to be largely separate from Swindon and in terms of functional relationships, Malmesbury is more important to Chippenham’s workforce than it is to Swindon. **Therefore, we would recommend that Malmesbury Community Area is included as part of the “Best Fit” to Chippenham HMA.**

## Melksham

- 3.14 Melksham Community Area is also divided, with Melksham town (towards the north of the area) covered by Chippenham HMA whereas the rural hinterland (which covers the south of the area) covered by Trowbridge HMA and part of its southern boundary adjoining Trowbridge Community Area.
- 3.15 The substantial majority of the population for Melksham Community Area as a whole live in Chippenham HMA; however, for the “Melksham Rural” sub-area the population is divided almost equally between Chippenham HMA and Trowbridge HMA.
- 3.16 When considering commuting patterns, “Melksham” and “Melksham without” (the two sub-areas to the north of Melksham Community Area) have over half of their resident workers (54%) working in Chippenham HMA with around a third (34%) travelling to Trowbridge HMA. However, of the workers living in the “Melksham rural” sub-area, there is a more equal division with 46% travelling to work in Trowbridge HMA and 44% commuting to Chippenham HMA.
- 3.17 Given this context, it is clear that the southern part of Melksham Community Area has a well-established functional relationship with Trowbridge HMA, and given that this area adjoins Trowbridge itself it would seem appropriate to consider “Melksham rural” separately from the rest of Melksham. **On this basis, we would recommend that the “Melksham” and “Melksham without” sub-areas are included as part of the “Best Fit” to Chippenham HMA whilst the “Melksham rural” sub-area is included as part of the “Best Fit” to Trowbridge HMA.**

## Mere

- 3.18 Mere is the third Community Area where the associated HMA isn’t clear-cut. Around three quarters of the population (77%) live in the Trowbridge HMA with the remainder (23%) living in Salisbury HMA. However, part of this area was allocated to Trowbridge HMA when the boundaries were “snapped” to the Wiltshire county boundary.
- 3.19 Many of the functional relationships look beyond the Wiltshire county boundary, and around three quarters of the population (74%) live in Blandford Forum and Gillingham TTWA (with the remainder in Salisbury TTWA) and almost four fifths (79%) live in Salisbury BRMA (with the remainder in Yeovil BRMA). The previous allocation of this area to Trowbridge HMA must therefore be considered in this context.
- 3.20 When considering the commuting patterns of the resident workers living in Mere Community Area and commuting to other parts of Swindon and Wiltshire, over three fifths (62%) work in Salisbury HMA, 20% work in Trowbridge HMA, 13% work in Chippenham HMA and 5% in Swindon HMA. **Taking everything into account, we would recommend that Mere Community Area is included in a best fit to Salisbury HMA.**

## Pewsey

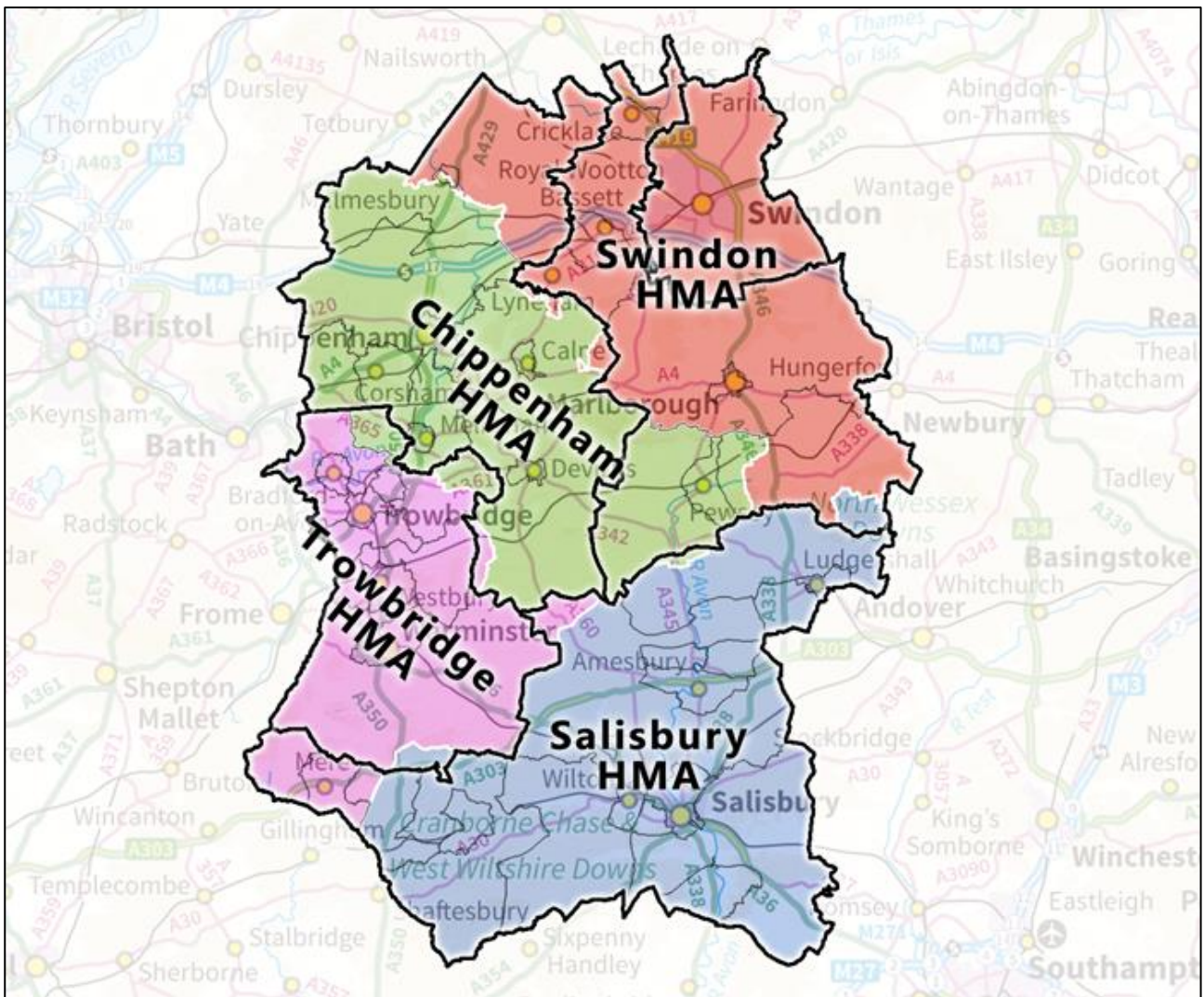
- 3.21 The final area requiring further consideration is Pewsey, which is split between three functional HMAs: Chippenham, Salisbury and Swindon. Approaching two thirds of the population (64%) live in Chippenham HMA; however over half (52%) live in Swindon TTWA with around a third (35%) in Newbury TTWA and the remainder (14%) in Salisbury TTWA. When considering Broad Rental Market Areas, the substantial majority (78%) live in Salisbury BRMA, with 16% in Newbury BRMA, 5% in West Wilts BRMA and 1% in Swindon BRMA. In terms of resident workers commuting out of the Community Area to other parts of Swindon and Wiltshire, there is a clear split: 40% work in Swindon HMA, 38% work in Chippenham HMA, 15% work in Salisbury HMA and 7% in Trowbridge HMA.

- 3.22 Taking everything into account, it is clear that Pewsey Community Area is divided and there are clear reasons that could be argued for it to be included in any one of the three functional HMAs that it covers. Nevertheless, given that housing market areas primarily seek to reflect the relationship between places where people live and work, given that the majority of workers (albeit a small majority) commute to work in Swindon and over half of the population live within the Swindon TTWA, it seems appropriate to allocate Pewsey to the Swindon HMA. Furthermore, when considering the geography of the area and the resulting boundaries for the possible “Best Fit” HMAs, including Pewsey within the Swindon HMA would appear to provide the most appropriate combination. **On this basis, we would recommend that Pewsey Community Area is included as part of the “Best Fit” to Swindon HMA.**

## “Best Fit” Housing Market Areas

- 3.23 Having considered the functional HMAs in the context of sing Community Areas as the basic geographic building blocks, Figure 5 shows the proposed “Best Fit” boundaries. These “Best Fit” HMAs provide a pragmatic basis for planning purposes having taken account of all of the available evidence about the complex functional relationships that exist across the Study Area.

**Figure 5: Community Area-based ‘Best Fit’ HMAs (Note: Shaded zones show functional HMAs; solid black lines identify LPA boundaries and “Best Fit” HMA boundaries within Wiltshire)**





## Establishing LHN by Housing Market Area

- 3.24 The official household projections provide a key input to the LHN figure, and the household projections are based on the ONS sub-national population projections (SNPP). However, these figures are only available to the level of local authorities and it is necessary to prepare sub-area projections for each HMA in order to establish the relevant LHN figure for each HMA.
- 3.25 Using the ONS small area population estimates, we can identify the resident population for each of the HMAs at the base date of the projection. It is possible to establish the natural growth of this population through applying the fertility and mortality rate schedules for Wiltshire from the 2014-based SNPP iteratively for each year of the projection period. However, it is also important to establish the impact of net migration given that this is a key driver to future population growth.
- 3.26 Migration rates in the SNPP are based on population trends for the 5-year period prior to the projection base date – so the 2014-based projections are informed by migration trends over the 5-year period 2009-2014. Using the ONS small area population estimates for the same period, it is possible to establish migration trends for each of the HMAs. This is done through considering the difference between the population change based on natural growth and the actual population change that was recorded. This provides a basis for distributing the local authority net migration between each of the HMAs whilst also factoring in any internal migration within the county.
- 3.27 Through combining the projected natural growth for each area with the impact of net migration, the local authority projections can be disaggregated between the HMAs. These population projections then provide the basis for establishing household projections, using local authority figures for communal establishments and household representative rates from the official household projections combined with specific local information on the distribution of communal establishments within the county and variations in household types and sizes between the HMAs.
- 3.28 Figure 6 summarises the annual LHN figure by local authority and HMA, together with 20-year totals which provide the basis for the plan period 2016-2036.

**Figure 6: Annual LHN and 20-year Total figures by LA and HMA (Note: Based on 2014-based household projections)**

Housing Market Area	5-year migration trend					
	Annual LHN			20-year Total		
	Swindon	Wiltshire	Total	Swindon	Wiltshire	Total
Chippenham HMA	-	681	681	-	13,629	13,629
Salisbury HMA	-	611	611	-	12,229	12,229
Swindon HMA	1,040	224	1,264	20,800	4,477	25,277
Trowbridge HMA	-	525	525	-	10,505	10,505
<b>TOTAL</b>	<b>1,040</b>	<b>2,042</b>	<b>3,082</b>	<b>20,800</b>	<b>40,840</b>	<b>61,640</b>

- 3.29 The LHN figure is based on the official household projections, which are informed by 5-year migration trends. However, it is important to recognise that migration assumptions can have a substantial impact on population and household projections, and the effects are often more pronounced when projections are prepared for smaller geographies such as Community Areas. This is because the identified growth for each area will represent only a part of the overall growth – so the numbers will almost inevitably be smaller, and therefore any uncertainty will typically represent a larger percentage of the estimate. Furthermore, there also tends to be greater uncertainty when considering data for smaller populations.

- 3.30 Given this context, even though the official projections which inform the LHN figure are based on 5-year trends, it is still appropriate to consider the impact of different migration trends when establishing small area estimates. This was endorsed by the Planning Advisory Service OAN technical advice note (second edition, July 2015)<sup>3</sup> which strengthened the recommendation on the relevant period for assessing migration (paragraph 6.24):

*“In assessing housing need it is generally advisable to test alternative scenarios based on a longer reference period, probably starting with the 2001 Census (further back in history data may be unreliable). Other things being equal, a 10-to-15 year base period should provide more stable and more robust projections than the ONS’s five years. But sometimes other things will not be equal, because the early years of this long period included untypical one-off events as described earlier. If so, a shorter base period despite its disadvantages could be preferable.”*

- 3.31 The relevant period for assessing migration trends was also considered by an article by Ludi Simpson (Professor of Population Studies at the University of Manchester) and Neil MacDonald (previously Chief Executive of the National Housing and Planning Advice Unit) published in Town and Country Planning:<sup>4</sup>

*“The argument for using a five-year period rather than a longer one is that the shorter the period, the more quickly changes in trends are picked up. The counter-argument is that a shorter period is more susceptible to cyclical trends, an argument that has particular force when the five-year period in question – 2007-12 – neatly brackets the deepest and longest economic downturn for more than a generation. ... A large number of local authority areas are affected by this issue. For 60% of authorities the net flow of migrants within the UK in 2007-12 was different by more than 50% from the period 2002-07. While this is comparing a boom period with a recession, it serves to indicate the impact of the choice of reference period for trend projections.”*

- 3.32 For this reason, the 2017 SHMA argued that 10-year migration trends were generally more appropriate when establishing overall housing need given that a longer-term trend is less susceptible to short-term peaks and troughs. Given this context, Figure 6 summarises the annual LHN figure and 20-year totals by local authority and HMA when the distribution is based on 10-year trends. It is evident that 10-year migration trends suggest a higher LHN figure for Chippenham HMA (867 cf. 679 dpa, an increase of 28%) with lower LHN figures for each of the other HMAs.

**Figure 7: Annual LHN and 20-year Total figures by LA and HMA – variant scenario using 10-year migration trends to distribute the Wiltshire LHN between HMAs (Note: Based on 2014-based household projections)**

Housing Market Area	10-year migration trend					
	Annual LHN			20-year Total		
	Swindon	Wiltshire	Total	Swindon	Wiltshire	Total
Chippenham HMA	-	871	871	-	17,411	17,411
Salisbury HMA	-	524	524	-	10,472	10,472
Swindon HMA	1,040	147	1,187	20,800	2,936	23,736
Trowbridge HMA	-	501	502	-	10,021	10,021
<b>TOTAL</b>	<b>1,040</b>	<b>2,042</b>	<b>3,082</b>	<b>20,800</b>	<b>40,840</b>	<b>61,640</b>

<sup>3</sup> <http://www.pas.gov.uk/documents/332612/6549918/OANupdatedadvisenote/f1bfb748-11fc-4d93-834c-a32c0d2c984d>

<sup>4</sup> “Making sense of the new English household projections”, Town and Country Planning (April 2015)

## 4. Jobs and Workers

### Alignment of Future Jobs Growth with Resident Workers

#### Considering the basis for Adjusting the Local Housing Need

- 4.1 Whilst PPG sets out a standard approach for establishing local housing need [ID 2a-004-20190220], this is a minimum figure and the PPG also provides examples of a number of circumstances where it may be more appropriate to use a higher figure for plan-making [ID 2a-010-20190220].

***When might it be appropriate to plan for a higher housing need figure than the standard method indicates?***

*The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.*

*This will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan). Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:*

- » *growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);*
- » *strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or*
- » *an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;*

**Planning Practice Guidance, ID 2a-010-20190220**

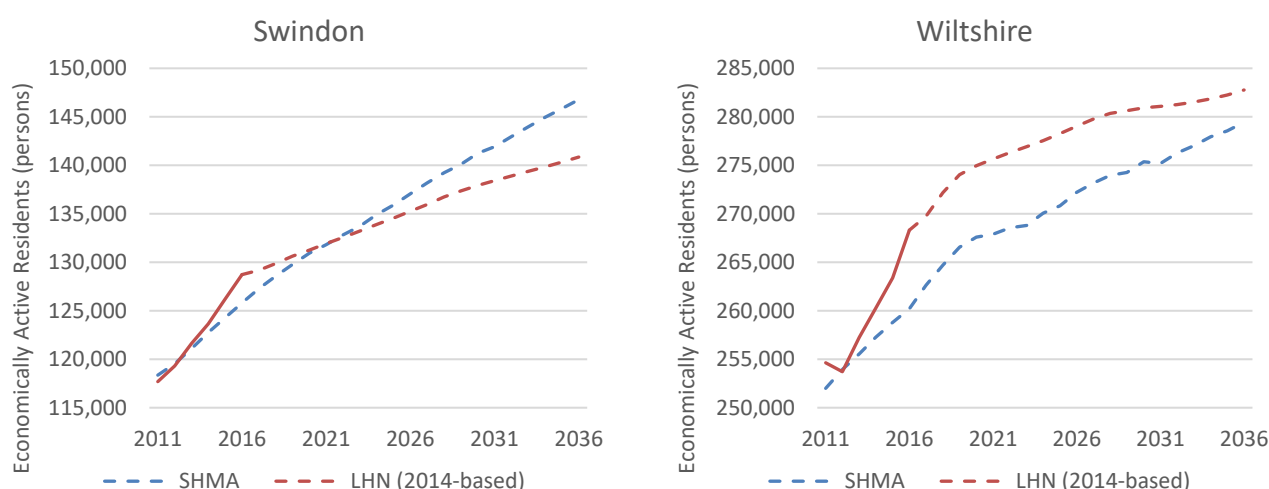
- 4.2 The PPG is clear that only in exceptional circumstances should an alternative to the standard method that results in a lower figure should be used [ID 2a-015-20190220]; therefore, preparing each Plan based on a number that is higher than the current LHN will help to ensure that fluctuations in the LHN in future years are more likely to be accommodated without changes being needed, given that the housing requirement is only fixed for 2 years from the point at which plans are submitted.
- 4.3 When considering the factors that could justify an uplift to the LHN, one of the most important is ensuring that the number of new homes takes account of changes that are anticipated in the local economy as well as population trends. Each settlement has different economic strengths and weaknesses, and these are a planning consideration which could mean that different HMAs have different prospects for growth. This section therefore looks at whether a housing number that is higher than the LHN may to be considered for each HMA, and what alternative figure may be justified for the next steps of plan preparation. Ultimately, it will be for each local planning authority to determine the extent of any increase when establishing the housing requirement. This will involve evidence-based judgements over a range of different factors.



## Economically Active Population

- 4.4 While demographic trends are key to the assessment of housing need, it is also relevant to consider current employment trends and how the projected growth of the economically active population fits with the future changes in job numbers.
- 4.5 The last assessment of the balance between jobs and workers for Swindon and Wiltshire was set out in the Strategic Housing Market Assessment 2017. The 2017 SHMA projected that Swindon would have around 127,300 economically active residents with around 260,200 in Wiltshire at the start of the plan period in 2016. However, the latest data suggests that economic activity rates have increased faster than had been forecast which has increased these figures to 128,700 persons in Swindon (an increase of 5,500) and 269,800 persons in Wiltshire (an increase of 9,600).
- 4.6 The LHNA has modelled the projected growth in economically active population (i.e. the number of resident workers) based on the LHN figure together with changes in Economic Activity Rates forecast by the Office for Budget Responsibility (OBR). Figure 8 compares the economically active population as projected by the 2017 SHMA with the latest data from the LHN calculation using the 2014-based household projections.

**Figure 8: Economically Active Residents in Swindon and Wiltshire 2016-2036: Comparison between the 2017 SHMA and the LHN figure (Note: Solid lines based on estimates; dashed lines based on projected population and forecast change in economic activity rate. Both scenarios for Wiltshire include the expected increase in service personnel living in Single Living Accommodation)**



- 4.7 Considering the LHN population projections for Swindon in the context of the latest economic activity rate forecasts, the number of economically active residents is likely to increase to around 140,900 persons by 2036 compared to 146,800 persons estimated by the Original SHMA. However, the 2017 SHMA concluded an Objectively Assessed Need (OAN) of 29,000 dwellings over the 20-year period 2016-36 compared to an LHN figure of 20,460 dwellings over the same period. As the LHN figure represents 8,540 fewer dwellings than the previous OAN, there would be fewer households resident in the area by 2036 which in turn would be expected to yield fewer workers. However, given the higher starting estimate, the growth in resident workers has reduced from almost 21,000 persons in the 2017 SHMA to 12,100 persons based on the LHN.
- 4.8 Considering the LHN population projections for Wiltshire, the number of economically active residents is likely to increase to around 282,800 persons by 2036 compared to 279,500 persons estimated by the 2017 SHMA (both figures including a specific allowance for increases in service personnel living in Single Living Accommodation which are not captured by the population and household projections). Nevertheless, given

the higher starting estimate, the growth in resident workers has reduced from around 19,200 persons in the 2017 SHMA to 14,500 persons based on the LHN. This is despite the 2017 SHMA OAN (43,000 dwellings over the 20-year period 2016-36) being comparable to the LHN figure of 40,680 dwellings over the same period.

- 4.9 On this basis, the overall increase in resident workers has reduced from just over 40,000 persons estimated by the 2017 SHMA (37,600 based on demographic growth together with the specific allowance for 2,600 additional service personnel living in SLA) to around 26,600 additional workers based on the LHN figure (24,800 based on demographic growth plus the 2,600 additional service personnel). Figure 9 shows the breakdown by HMA.

**Figure 9: Change in Economically Active Population 2016-2036 by HMA**

Housing Market Area (residence)	Demographic projection			Allowance for Service Personnel Living in SLA
	Original SHMA	LHN (2014-based)		
		5-year migration	10-year migration	
Chippenham HMA	+13,393	+2,065	+2,660	+126
Salisbury HMA	+1,462	+7,479	+7,105	+2,440
Swindon HMA	+13,826	+11,109	+10,883	-
<i>within Wiltshire</i>	<i>-7,150</i>	<i>-1,503</i>	<i>-1,729</i>	-
Trowbridge HMA	+8,967	+4,103	+4,108	-
<b>TOTAL</b>	<b>+37,648</b>	<b>+24,756</b>	<b>+24,756</b>	<b>+2,566</b>
Swindon Borough	+20,976	+12,612	+12,612	-
Wiltshire	+16,672	+12,144	+12,144	+2,566

- 4.10 Whilst a majority of economically active residents work within the same functional HMA and others commute to other HMAs within the Swindon and Wiltshire study area, some will travel to jobs elsewhere.
- 4.11 Figure 10 identifies the proportion of resident workers in each HMA that work either within the same HMA or another HMA within the Swindon and Wiltshire study area. Most HMAs have around 80% of their economically active residents working within the study area. On this basis, based on the LHN figure there is likely to be around 20,200 local workers, with an increase of around 4,500 workers commuting to jobs elsewhere.

**Figure 10: Change in Economically Active Population working within the Study Area 2016-2036 by HMA (Source: Commuting rates based on 2011 Census. Notes: Excludes additional service personnel living in SLA. Local Authority figures are not available as commuting patterns are considered on a HMA basis)**

Housing Market Area (residence)	Percentage of EA population working within the Study Area	Change in workers to fulfil jobs within Study Area		
		Original SHMA	LHN (2014-based)	
			5-year migration trend	10-year migration trend
Chippenham HMA	83.0%	+11,158	+1,714	+2,207
Salisbury HMA	80.4%	+1,181	+6,013	+5,712
Swindon HMA	82.9%	+11,505	+9,207	+9,020
Trowbridge HMA	79.6%	+7,177	+3,268	+3,272
<b>TOTAL</b>	<b>-</b>	<b>+31,021</b>	<b>+20,202</b>	<b>+20,211</b>
Outside Study Area	-	+6,627	+4,554	+4,545

- 4.12 Figure 11 develops the information further, identifying the commuting patterns between HMAs within the Study Area. Based on this information, the change in workplace population can be established for the two scenarios.

**Figure 11: Commuting flows between HMAs and associated change in workplace population resident in the Study Area**  
(Source: Commuting rates based on 2011 Census. Note: Excludes additional service personnel living in SLA)

Housing Market Area (residence)		Change in workers to fulfil jobs within Study Area		Housing Market Area (workplace)			
		5-year migration trend	10-year migration trend	Chippenham HMA	Salisbury HMA	Swindon HMA	Trowbridge HMA
Chippenham HMA		+1,714	+2,207	81.3%	2.4%	10.5%	5.9%
Salisbury HMA		+6,013	+5,712	2.5%	91.5%	1.2%	1.8%
Swindon HMA		+9,207	+9,020	3.6%	0.6%	95.4%	0.4%
Trowbridge HMA		+3,268	+3,272	11.9%	4.5%	1.6%	78.2%
TOTAL	5-yr trend	+20,202	-	+2,279	+5,924	+9,092	+2,906
	10-yr trend	-	+20,211	+2,666	+5,651	+8,961	+2,933

- 4.13 Whilst the increase in resident workers for Chippenham HMA ranges between 1,700 and 2,200, there is a larger workplace increase ranging from 2,300 to 2,700 workers. This is due to inward commuting from other areas, in particular the Trowbridge HMA. Conversely, whilst Trowbridge HMA has an increase of around 3,300 resident workers, this translates to around a 2,900 workplace increase. Both Salisbury HMA and Swindon HMA have similar resident worker and workplace increases (5,700 to 6,000; and 9,000 to 9,200 respectively).

## Future Jobs Growth

- 4.14 An Economic and Development Needs Assessment (EDNA) was jointly commissioned at the same time as the 2017 SHMA, and this was undertaken by Hardisty Jones Associates (HJA). The EDNA identified the likely jobs growth for Swindon and Wiltshire and their constituent Functional Economic Market Areas (FEMAs). The FEMAs broadly align with the HMAs: both Swindon and Salisbury have separate FEMAs which align with their respective HMA, but there is only a single FEMA which covers the Chippenham HMA and Trowbridge HMA combined area.
- 4.15 The future number of jobs were considered by the EDNA based on forecasts from both Oxford Economics (January 2016) and Cambridge Econometrics (November 2015) for the 20-year period 2016-2036. This information was considered alongside past trends, and the study concluded that the total number of jobs across Swindon and Wiltshire was likely to increase by around 40,200 over the period 2016-2036. This included the specific increase in service personnel. The projection for the Swindon Unitary Authority Area was based on an average for the Oxford Economics and Cambridge Econometrics baseline projections, but made specific adjustments to those baselines to assume no decline in motor vehicle manufacturing employment in the period to 2036 and to take the highest projection for the growth in retail sector employment. The EDNA report sets out further details on these assumptions and the associated consultation that was undertaken. However, in light of the February 2019 announcement of the planned closure of the Honda car making plant in Swindon, there may now be some doubts as to the continued robustness of the EDNA jobs projection for Swindon Borough and the Swindon HMA.



- 4.16 Figure 12 summarises the change in jobs identified for the four separate housing market areas. This separates main jobs from second jobs, and the specific allowance for additional service personnel.

**Figure 12: Forecast change in Main Jobs and Second Jobs 2016-2036 by HMA (Source: Swindon and Wiltshire Economic Development Needs Assessment 2017)**

Housing Market Area (workplace)	Change in Jobs (excluding service personnel living in SLA)			Allowance for Service Personnel Living in SLA	OVERALL TOTAL
	Main Jobs	Second Jobs	TOTAL		
Chippenham HMA	+7,245	+929	+8,174	+126	+8,300
Salisbury HMA	+7,715	+1,280	+8,995	+2,440	+11,435
Swindon HMA (total)	+12,694	+2,336	+15,030	-	+15,030
<i>within Wiltshire</i>	<i>+2,570</i>	<i>+323</i>	<i>+2,893</i>	-	<i>+2,893</i>
Trowbridge HMA	+4,859	+614	+5,473	-	+5,473
<b>TOTAL</b>	<b>+32,513</b>	<b>+5,159</b>	<b>+37,672</b>	<b>+2,566</b>	<b>+40,238</b>
Swindon Borough	+10,124	+2,013	+12,137	-	+12,137
Wiltshire	+22,389	+3,146	+25,535	+2,566	+28,101

- 4.17 Of course, not all resident workers will work locally, and some jobs will be fulfilled by workers commuting from other HMAs in Swindon and Wiltshire or from outside the Study Area. Figure 13 identifies the percentage of main jobs in each of the HMAs fulfilled by commuters living outside the Study Area. Only a minority of workers commute from homes outside the area, ranging from 19.2% of jobs in Salisbury HMA to 10.3% of jobs in Chippenham HMA.
- 4.18 Based on the existing rates, it is likely that around 4,359 of the additional main jobs will be taken by workers commuting from outside the Study Area and there will therefore be a need for an additional 27,974 resident workers to satisfy the forecast jobs growth. These figures assume no change in commuting patterns compared to those recorded by the 2011 Census.

**Figure 13: Resident Workers needed to fulfil growth in main jobs by HMA (Source: Commuting rates based on 2011 Census. Notes: All figures exclude additional service personnel living in Single Living Accommodation. Local Authority figures are not available as commuting patterns are considered on a HMA basis)**

Housing Market Area (workplace)	Increase in Main Jobs	Percentage of Main Jobs fulfilled by commuters	Increase in Inward Commuting	Increase in Resident Workers Needed
Chippenham HMA	7,245	10.3%	743	6,503
Salisbury HMA	7,715	19.2%	1,479	6,235
Swindon HMA (total)	12,694	12.6%	1,603	11,091
<i>within Wiltshire</i>	<i>+2,570</i>	-	-	-
Trowbridge HMA	+4,859	14.7%	714	4,145
<b>TOTAL</b>	<b>+32,513</b>	<b>-</b>	<b>4,539</b>	<b>27,974</b>
Swindon Borough	+10,124	-	-	-
Wiltshire	+22,389	-	-	-

## Aligning Future Jobs and Workers

- 4.19 Figure 14 considers the increase in resident workers needed to fulfil the growth in main jobs (Figure 13) alongside the increase in resident workers projected based on the LHN figures for the HMAs in terms of their workplace population based on the two variant scenarios (Figure 11) in order to establish the extent of any shortfall or surplus of workers for each of the HMAs.

**Figure 14: Alignment between increase in resident workers needed to fulfil growth in main jobs and projected increase based on the LHN by HMA (Notes: All figures exclude additional service personnel living in Single Living Accommodation. The Swindon HMA shortfall has been apportioned pro rata to the jobs growth to establish shortfall figures by LA)**

Housing Market Area (workplace)	Increase in Resident Workers Needed	Increase in Resident Workers based on LHN		Net shortfall or surplus of Resident Workers	
		5-year migration trend	10-year migration trend	5-year migration trend	10-year migration trend
Chippenham HMA	6,503	2,279	2,666	-4,223	-3,836
Salisbury HMA	6,235	5,924	5,651	-311	-584
Swindon HMA (total)	11,091	9,092	8,961	-1,999	-2,130
<i>within Wiltshire</i>	-	-	-	-405	-431
Trowbridge HMA	4,145	2,906	2,933	-1,239	-1,213
<b>TOTAL</b>	<b>27,974</b>	<b>20,202</b>	<b>20,211</b>	<b>-7,773</b>	<b>-7,763</b>
Swindon Borough	-	-	-	-1,594	-1,699
Wiltshire	-	-	-	-6,178	-6,065
Outside Study Area	4,539	4,554	4,545	-	-

- 4.20 Based on this analysis, there would be a shortfall of workers across all four of the HMAs, ranging from a shortfall of between 300 and 600 workers in Salisbury HMA up to a shortfall of between 3,800 and 4,200 workers in Chippenham HMA. In order to align the projected increase in resident workers with the number of additional workers needed to fulfil the forecast jobs growth without any changes in commuting patterns, it is likely that the housing supply would need to increase above the minimum LHN.
- 4.21 Figure 15 sets out the additional dwellings that would be needed to enable sufficient resident workers to live in each area based on the forecast jobs growth.

**Figure 15: Total dwellings needed to align jobs and workers by HMA**

Area	5-year migration trend			10-year migration trend		
	LHN	Additional dwellings to align jobs	Total dwellings	LHN	Additional dwellings to align jobs	Total dwellings
Chippenham HMA	13,629	3,290	16,919	17,411	2,979	20,390
Salisbury HMA	12,229	272	12,501	10,472	504	10,976
Swindon HMA (total)	25,277	1,091	26,368	23,736	1,183	24,919
<i>within Wiltshire</i>	4,477	304	4,781	2,936	322	3,258
Trowbridge HMA	10,505	1,002	11,507	10,021	976	10,997
<b>TOTAL</b>	<b>61,640</b>	<b>5,655</b>	<b>67,295</b>	<b>61,640</b>	<b>5,642</b>	<b>67,282</b>
Swindon Borough	20,800	787	21,587	20,800	861	21,661
Wiltshire	40,840	4,868	45,708	40,840	4,781	45,622

- 4.22 On the basis of the analysis, to ensure that there will be sufficient resident workers to align with the jobs growth identified by the 2017 EDNA forecast on the basis of not change in the commuting rates identified by the 2011 Census, it would be necessary consider increasing the minimum LHN by up to 5,700 dwellings with most of this increase (at least 85%) being in Wiltshire. This would yield a total of around 67,300 dwellings over the 20-year plan period 2016-2036; comprising around 21,600 dwellings in Swindon (equivalent to an average of 1,080 dpa) and around 45,700 dwellings in Wiltshire (equivalent to an average of 2,285 dpa). These figures compare to an Objectively Assessed Need (OAN) of 29,000 dwellings for Swindon Borough and 44,000 dwellings for Wiltshire identified by the 2017 SHMA.
- 4.23 When considering the distribution between housing market areas, in summary we can conclude:
- » **Chippenham HMA:** between 16,900 and 20,400 dwellings overall, equivalent to 845-1,020 dpa on average over the 20-year period. This compares to an OAN of 22,250 dwellings identified by the previous SHMA;
  - » **Salisbury HMA:** between 11,000 and 12,500 dwellings overall, equivalent to 550-625 dpa on average over the 20-year period. This compares to an OAN of 8,250 dwellings identified by the previous SHMA;
  - » **Swindon HMA:** between 24,900 and 26,400 dwellings overall, equivalent to 1,245-1,320 dpa on average over the 20-year period; which includes 3,300-4,800 dwellings (165-240 dpa) in the part of the Swindon HMA within Wiltshire. This compares to an OAN of 29,000 dwellings identified by the previous SHMA; and
  - » **Trowbridge HMA:** between 11,000 and 11,500 dwellings overall, equivalent to 550-575 dpa on average over the 20-year period. This compares to an OAN of 13,500 dwellings identified by the previous SHMA.
- 4.24 Whilst some of the differences between the current figures and the 2017 SHMA are due to changes in the boundaries of the “best fit” HMAs (which now align to Community Area boundaries within Wiltshire), differences in assumptions relating to migration and the uplifts applied to the household projections have also had a notable impact.

## Conclusions

- 4.25 The CLG Standard Method identified a minimum LHN of 20,800 dwellings for Swindon and 40,680 dwellings for Wiltshire over the 20-year period 2016-36. However, it will be important to consider whether or not a housing number that is higher than this minimum would be appropriate to use when plan-making.
- 4.26 Based on the analysis above, the employment growth projections identified by the 2017 EDNA would require a larger number of homes to be provided than the minimum LHN in order to ensure there will be sufficient workers to align with the forecast jobs growth without any change to the net commuting rates recorded by the 2011 Census. The authorities will need to consider their response to the evidence which suggests that up to an additional 6,300 dwellings would have to be provided to enable sufficient workers to live in the combined area.



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