

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

Cabinet

Date: 10th July 2019

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

Wards: All

Parishes Affected: All

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 26th 2015 (Council Minute 97, 2014/15 refers). The independent Local Plan Inspector in his

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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 6th November 2017 and 19th 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 2036¹. 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:

¹ 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 29th July 2019 to 23rd 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)

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)

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)

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.