

NEV Planning Obs dSPD Comments and Responses (Organisation)

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
1	Swindon Museum and Art Gallery	1	While SM&AG supports the preservation of nationally significant archaeology (such as Scheduled Ancient Monuments) in situ, it recognises that it would be inappropriate and unfeasible to preserve all archaeology associated with the area in situ. It would support recommendations from the County Archaeologist to conduct archaeological investigations and excavations where appropriate.		Point noted.
1	Swindon Museum and Art Gallery	2	SM&AG expects the development of the NEV would create some of the largest and most significant archaeological archives in the history of Swindon. This prediction is based on the scale and location of the NEV, archaeology already identified in preliminary investigations and the significant archaeology associated with nearby areas. Existing archaeological storage owned and managed by SBC does not have capacity to receive an archive of this size, or provide any form of community access.		Point noted. The Council is working closely with its partners to deliver solutions.

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1	Swindon Museum and Art Gallery	3	There is an opportunity to create new archaeology storage within the NEV, potentially co-locating with another service. This facility would provide secure, environmentally appropriate storage space for the archaeology excavated in the NEV area. This in turn would enable researcher and other forms of access, as well as temporary displays and other forms of interpretation. The facility would provide opportunities for volunteering and		Point noted. The Council is working closely with its partners to deliver solutions
2	Thames Water Ltd (Thames Water)	1	A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. New development should be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure.		Noted. The purpose of the SPD is to provide further information on the timely delivery of infrastructure in conformity with the adopted Local Plan.
2	Thames Water Ltd (Thames Water)	2	Paragraph 156 of the National Planning Policy Framework (NPPF), March 2012, states: LPAs should set out strategic policies for the area in the Local Plan. This should include strategic policies to deliver.... the provision of infrastructure for water supply and wastewater.		The Local Plan, adopted in March 2015 adequately covers this issue.

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2	Thames Water Ltd (Thames Water)	3	Paragraph 162 of the NPPF relates to infrastructure and states: Local planning authorities should work with other authorities to: assess the quality and capacity of infrastructure for water supply and wastewater and its treatment...take account of the need for strategic infrastructure including nationally significant infrastructure within their areas.		Point noted.
2	Thames Water Ltd (Thames Water)	4	The web based National Planning Practice Guidance (NPPG) published in March 2014 includes a section on 'water supply, wastewater and water quality' and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that "Adequate water and wastewater infrastructure is needed to support sustainable development" (Paragraph: 001, Reference ID: 34-001-20140306).		Point noted.

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2	Thames Water Ltd (Thames Water)	5	It is important to consider the net increase in water and wastewater demand to serve the development and also any impact that developments may have off site, further down the network. It is therefore important that developers demonstrate that adequate water supply and wastewater infrastructure capacity exists both on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate reports and appraisals to ascertain whether the proposed development will lead to overloading of existing water and sewerage infrastructure.	Thames Water therefore support the references to waste water infrastructure in the Utility Services section of the IDP, but consider that this should be amended to also refer to water supply infrastructure.	Point noted, the village proformas have been updated to reflect this.

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2	Thames Water Ltd (Thames Water)	6	<p>Swindon water resources and supply position statement, April 2016</p> <p>The majority of potable water for Swindon is supplied via the existing water main network coming from the Blunsdon reservoir zone, with a small element provided by the Overtown reservoir zone.</p> <p>Thames Water will not require additional water resources from their Overtown zone to support the growth from the Eastern Villages. The water required for the Eastern Villages will come from Farmoor in Oxfordshire, which is the key feed of potable water to Blunsdon reservoir zone.</p> <p>The new Axford north / south trunk main being currently constructed will be transferring water resources from north to south due to forthcoming abstraction reductions negotiated with the Environment Agency at Thames Water's water treatment works at Axford. The primary purpose of the new north / south trunk main is not to provide a direct feed to the Eastern Villages as the trunk main is on a different programme to the Eastern Villages and the trunk main's design doesn't allow for practicable direct potable flows to the Eastern Villages. The Eastern Villages will, however, require further assets to be installed to provide a robust, resilient water supply and one option currently</p>		Point noted.

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			<p>under consideration is a connection into the new pipeline.</p> <p>In relation to the current build out of the Swindon Front Garden development (just north of the M4 between junctions 15 and 16), the initial phases of the Front Garden development will receive its water from the Overtown zone, but when sufficient level of housing growth is achieved water will be supplied via the Blunsdon Reservoir zone instead. Again, a connection into the new pipeline is being reviewed here.</p> <p>In relation to waste water, a strategic waste water treatment solution for the Eastern Villages is currently being investigated by Thames Water and their AMP6 Alliance (Eight20) .</p>		
2	Thames Water Ltd (Thames Water)	7	Thames Water therefore support the references to waste water infrastructure in the Utility Services section of the IDP, but consider that this should be amended to also refer to water supply infrastructure.		Point noted. Village proformas updated to reflect this update.
7	Gloucester County Council	1	The Eastern Villages development will have an effect both on south-east Gloucestershire and strategically through the county of Gloucestershire. This effect will be compounded by the development proposals in the Cotswold Local Plan which seek to allocate the bulk of development provision within the south of the Cotswold district and south of Cirencester.		Noted. The Council is working in partnership with adjacent authorities and delivery partners to ensure the cumulative impact of development is assessed.

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7	Gloucester County Council	2	The high dependence on car travel in this area, coupled with a significant proportion of residents who commute daily between Cotswold District and Swindon, will need to be factored into the significant development proposals affecting the transport corridor between north-west Wiltshire and south-east Gloucestershire.		All traffic modelling considered for the New Eastern Villages is based upon actual traffic counts and road side interviews. The traffic flows are then adjusted up to reflect the future year of 2026 in accordance with DfT guidelines and then development traffic is added. This approach ensures that current and future commutability is considered along with the development impact.
7	Gloucester County Council	3	We would seek to enhance existing public transport linkages between Cirencester and Swindon namely through increased commercially operated bus services and enhancements to rail services between Kemble and Swindon railway stations.		The Village Proformas have been addressed to accommodate contributions to public transport services that will aim to deliver connectivity with key destinations that would be likely to include Cirencester.
7	Gloucester County Council	4	As Swindon already provides a key trip attractant to journeys originating in Gloucestershire there will be a need to account for this in the SPD, and a particular need to require that the A417 'missing link' scheme at Nettleton Bottom is delivered by Highways England to enable the development of 8000 dwellings and associated land uses at the Eastern Villages site without adding significant journey delays on this strategically important link.		The A417 'missing link' is located 40km north of the White Hart junction where north bound NEV traffic will enter the A419/A417 corridor. The distance and opportunity for re-routing ensures that traffic impact from the NEV at this location would be considered negligible and that funding from the development for this scheme would direct finances away from more critical schemes within and around Swindon Borough.
8	South Marston Parish Council	1	The housing blocks within the strategic housing area adjacent to the hotel in South Marston are inconsistent with the Swindon Local Plan strategic allocation.	Update Masterplan.	Noted.
8	South Marston Parish Council	2	It lacks an effective Rights of Way hierarchy, making it difficult to see the logic of non-motorised transport options.		The Masterplan will be produced with an enhanced public rights of way and recreational route hierarchy.

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8	South Marston Parish Council	3	•The routes of some existing ROW have been omitted.		The Masterplan will be produced to include any omitted or altered Rights of Way.
8	South Marston Parish Council	3	The routes of some existing ROW have been omitted.		A revised Masterplan will be produced to include any omitted or altered Rights of Way.
8	South Marston Parish Council	4	It does not incorporate the line of some Rights of Way routes as proposed by the draft South Marston Neighbourhood Plan (SMNP) and the more recent South Marston Parish Council report on cycle and rights of way networks produced in cooperation with the Swindon Bicycle Users Group.		The Masterplan will be produced with an enhanced public rights of way and recreational route hierarchy.
8	South Marston Parish Council	5	A cycleway south of the new development at Symmetry Point has been agreed within the grant of planning permission, but is missing from this Masterplan.		The Masterplan will be addressed to reflect the approved recreational routes at Symmetry Park, which represents the permitted employment use adjacent to the A420.
8	South Marston Parish Council	6	We understand the difficulty in making reference to the draft South Marston Neighbourhood Plan (SMNP) within the proformas before it is formally examined or 'made' by Swindon Borough Council. We would also not wish the proformas to be undermined by any reliance on a draft SMNP policy rather than justified by an existing Local Plan policy.	However, we believe it is justifiable to add the SMNP to the evidence base underpinning the draft SPD and note this within the SPD.	Noted. There is reference to the Neighbourhood Plan in the South Marston Village Proforma.

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8	South Marston Parish Council	7	Furthermore there are a small number of draft SPD elements (see Design, under the SM proforma) where a Local Plan policy is expanded upon within the draft SMNP and the evidence used to back a relevant SMNP policy.	Because of the linkage, we believe it is relevant, in these circumstances, to include mention of the justification offered within the draft SMNP within the proforma.	There are appropriate references made to the draft South Marston Neighbourhood Plan in the respective village proforma.
8	South Marston Parish Council	8	Traffic management including 20 mph zones and safe crossing points We wish to see a separate item included in the infrastructure costs table to cover traffic management contributions. To provide a comprehensive approach to road/pedestrian safety across the NEV, there will need to be both on-site and off-site shared contributions to traffic management measures. This will result in separate entries within each proforma for site specific requirements and shared infrastructure contributions.		Traffic management and calming measures throughout South Marston and Wanborough, and surrounding areas, is considered within the Village Proformas. Within the site, this will be considered at a very high strategic level through development of the Masterplan and at a street level of detail within Design Codes and layout plans associated with planning applications; both of which will be open for public scrutiny.

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8	South Marston Parish Council	9	We are concerned at the lack of a comprehensive approach to funding the construction of cycleways and rights of way (including roadside footways) across the NEV. This is all the more important given the poor connectivity north/south across the railway and the A420. We understand that this is one area under discussion within Swindon Borough Council and with partners, such as ourselves.	We wish to see a separate item included in the infrastructure costs table to cover construction of cycleways and rights of way. To provide a comprehensive network there will need to be both on-site and off-site shared contributions. This will result in separate entries within each proforma for site specific requirements and shared infrastructure	An updated Masterplan will be produced with an enhanced cycle, pedestrian and recreational route hierarchy. The funding for these measures will come from developers as part of the IDP towards the 'Bridge Strategy', which covers the links between the development islands, with all on-site routes delivered by the developer in accordance with the relevant Village Proforma and subject to any necessary planning conditions for delivery.

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8	South Marston Parish Council	10	<p>Early Years Provision</p> <p>The infrastructure costs tables include entries for both 0-2 and 2-4 years provision. We understand that specific provision for 2 year olds is now required within Swindon Borough. This means there are three different Early Years age brackets for which infrastructure provision must be made under 2's, 2 year olds, 3 to 4 year olds. This split is important since 0 to 1 year old provision is likely to be delivered through private nursery operation, whereas 2 year old upwards provision is more likely to be delivered on primary school premises.</p> <p>Whilst we appreciate that more work is planned with the Education department on this question, there are a number of relevant issues that need to be raised:</p> <p>Provision for under 2's is proportionately more expensive to provide (per child). The current split in costs for Early Years provision (as shown in the infrastructure table) does not appear to take this into account.</p> <p>There is also likely to be an issue relating to the viability of the locations of provision of under 2's which may need further exploration. It may be relevant for the SPD to include the requirement that land is earmarked for the locations for provision in addition to the cost elements.</p>		<p>Early Years provision will now be included as part of the Primary School provision and the IDP has been updated to reflect this.</p>

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8	South Marston Parish Council	12	<p>Health Provision</p> <p>Although land should be allocated, should the district Health Centre be built with private funds to avoid additional loading on S 106 costings? See e.g. http://www.phpgroup.co.uk/</p>		Please refer to the latest IDP which details the update cost for the delivery of health care provision at the NEV. The Council will continue to work proactively with healthcare providers to secure appropriate provision at the district centre and at other locations if necessary.
8	South Marston Parish Council	13	<p>We understand that the current partnership work with NHS England and other bodies aims to produce a strategy for delivery of health care and that it is likely to support the growth of dispersed healthcare within the NEV. Any strategy for dispersed healthcare will inevitably require appropriate premises within the individual villages, for instance, construction of white rooms with appropriate facilities attached within community buildings. The costs associated with health provision within the SPD should to allow for contributions to be made towards construction of those elements of community facilities that relate to delivery of dispersed healthcare.</p> <p>If they are to be viable and meet community needs, such premises should be multi-use facilities i.e. the NHS strategy should not assume sole use of any white room which should instead be accessible by private sector osteopaths, health counsellors, chiropodists etc.</p>		Noted. The Council are working closely with health care providers to ensure appropriate facilities are provided both locally (where required) and strategically through the delivery of a doctors surgery at the district centre.

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8	South Marston Parish Council	14	<p>Community Facilities</p> <p>We do not believe a viable community building, comprising hall, meeting room, reception, kitchen, toilets and changing facilities can be constructed for £0.56 million. However, if it is understood that the overall construction costs might be supplemented by capital costs from other budget headings e.g. sports changing rooms, car parking, early years and health provision, we accept that the cost of the community facilities element identified here might be somewhat less than the £1.6 million quoted to SM Parish Council for what is a fairly simple building.</p>		<p>Noted. The provision of community facilities at South Marston should importantly reflect the needs of the village. Such provision should offer flexibility to ensure that opportunities to use the facility by the community are maximised and accord with Policy RA3 of the Local Plan.</p>
8	South Marston Parish Council	15	<p>Strategic Infrastructure</p> <p>We wish for greater clarity on how 'shared' infrastructure is to be funded for off-site works in respect of Rights of Way, traffic management, community facilities, transport plans etc. It would be helpful for the detail of these to be available with the SPD so that we and other parish councils understand which developers will be contributing to which elements.</p>		<p>Shared items are those which are considered as local infrastructure requirements that are common to two or more Village Proformas. The village proformas relate to development parcels, with each development parcel contributing their proportional share based upon the number of houses they encompass or similar floor area of commercial land uses.</p>

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8	South Marston Parish Council	16	Flood Risk Concern was expressed during the consultation at the lack of mention of what is a significant local issue. Whereas on-site alleviation would be covered through the development control process, there are instances, in particular in South Marston, where off-site flood alleviation works might generate better value. How would this be covered within the SPD?	We suggest there should be mention of this in the SPD infrastructure costs table to enable this approach via financial contributions within a S106.	The South Marston village proforma now cross references the Swindon's Local Flood Risk Management Strategy. The onus will be on the developers to provide on and off site mitigation and this is also made clear in the village proformas.
8	South Marston Parish Council	17	South Marston on-site requirements Introduction: Add: '....or other settlements. Development must contribute towards the creation of an integrated village (LP RA3)'.		Noted. The South Marston village proforma has been updated to reflect this.
8	South Marston Parish Council	18	Main land uses: add: - Extension of recreation field (LP RA3). - land for SUDs provision, since we understand that this cannot be separately designated under the green infrastructure typologies. - Dedication of land to Community Forest.		Agreed on all points. The proforma has been updated to reflect this. The reference to SuDS is in the 'other considerations' section. With regards to the Great Western Community Forest, it's likely that this will be delivered through a combination of on and off site planting. Additional reference to on site planting schemes has been detailed under 'green infrastructure'.
8	South Marston Parish Council	19	Local Plan Policies: Add: draft South Marston Village Neighbourhood Plan as part of the evidence base.		Reference to the Neighbourhood Plan is already included as part of the evidence base section.

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8	South Marston Parish Council	21	Local Infrastructure Needs (provided on site) Residential: Suggest 'Design' can include reference to the need for elderly housing provision. The Local Plan requires local needs to be met, and the specific need for elderly housing is evidenced in the draft SMNP.		Agree
8	South Marston Parish Council	22	Local Infrastructure Needs (provided on site) Education: Early Years Provision: Requires separation into the relevant categories as outlined in our overall comments.		Contributions towards Early years has now been removed from the list of infrastructure requirements. Early years requirement will be delivered as part of the new Primary Schools on site. Please refer to the updated NEV IDP.
8	South Marston Parish Council	23	Local Infrastructure Needs (provided on site) Transport and Movement: Incorrect reference to Bridleway 5 - it should be Bridleway 4. We have agreed with SBC that we will no longer ask for the loop road north of Manor Farm to be shown on the Masterplan and that, instead, this item should be accompanied by the following justification: 'to deliver connectivity with existing village and village centre'		Point noted with regards to the reference to Bridleway 4. South Marston Village Proforma has been updated on this basis.

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8	South Marston Parish Council	24	<p>Local Infrastructure Needs (provided on site)</p> <p>Community Facilities: add:</p> <ul style="list-style-type: none"> - car parking and access roads. - Early Years 0-under 2 provision, if this is consistent with the strategy currently in development within SBC. 		<p>Car parking and access roads - Each development parcel and associated infrastructure provision will be subject to planning scrutiny and in the case of car parking will have to accord with SBC's adopted parking guidelines.</p> <p>Contributions towards Early years has now been removed from the list of infrastructure requirements.</p>
8	South Marston Parish Council	25	<p>Local Infrastructure Needs (provided on site)</p> <p>Waste Management and Utilities:</p> <p>add: specific mention of developer connections to sewage, water, gas and power networks provided by third party utilities providers.</p>		<p>On and off site 'waste management and utilities' sections of the South Marston village proforma has been updated to reflect this point.</p>
8	South Marston Parish Council	26	<p>Local Infrastructure Needs (provided on site)</p> <p>Other Considerations:</p> <ul style="list-style-type: none"> - On-site flood mitigation works - add 'that address the requirements demonstrated by the Environment Agency Surface Water and Fluvial flood map 2011 '. - Add: 'The social infrastructure for South Marston and the new village of Rowborough should be designed in tandem because of their proximity'. - Contributions to health provision - see overall comments above and in particular contributions to dispersed healthcare which may be shared or be 		<p>Agreed on first point. With regards to the second point, an appropriate trigger will be applied to ensure that the delivery of social infrastructure is provided in a timely fashion that supports the local communities of South Marston and Rowborough.</p> <p>Health provision is appropriately addressed in the village proforma.</p>

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8	South Marston Parish Council	27	<p>Main land uses - replicate proposed additions as per SM proforma</p> <p>Design:</p> <ul style="list-style-type: none"> - Add 'no road access to/from Nightingale Lane or Rowborough Lane' - add to last bullet 'and protect the setting of listed buildings in the vicinity' 		<p>Agreed.</p> <p>No access to Nightingale and Rowborough lanes incorporated as an individual bullet point. Protection of the listed buildings is covered by protection of the on-site historical landscape and protection of the character and identity of the village in the Green Infrastructure, Leisure and Heritage box in the South Marston Village Proforma.</p>
8	South Marston Parish Council	28	<p>Community facilities</p> <ul style="list-style-type: none"> - See request in overall comments for more clarity on provision of different facilities at sports hub and relationship to new school. - Add new car park at Nightingale Wood to provide access for Rowborough village. 		Amend if supported by FC request
8	South Marston Parish Council	28	<p>Other Considerations:</p> <ul style="list-style-type: none"> -On-site flood mitigation works - add 'that address the requirements demonstrated by the Environment Agency Surface Water and Fluvial flood map 2011' -Add 'The social infrastructure for South Marston and the new village of Rowborough should be designed in tandem because of their proximity'. -Contributions to health provision - see overall comments above and in particular contributions to dispersed healthcare which may be shared or be 		<p>1st point - Agreed. Second point - the timing of infrastructure is important to ensure that communities are supported at the right time and at the right place and this will be managed at the detailed Reserved Matters stage. Third point - The Council will continue to work proactively with healthcare providers to secure appropriate provision at the district centre and at other locations where necessary.</p>

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8	South Marston Parish Council	30	Strategic Infrastructure Needs Transport and Movement. -Add 'ramped' to contributions towards footbridge over railway -Separate heading for cycleways and other ROW, plus traffic management and road safety (see below) as both specific and shared infrastructure.		The footbridge will be constructed to a standard that meets DDA requirements and this will include ramps. Cycleway, Rights of Way, Traffic Management and Safety are considered within the revised village proformas.
8	South Marston Parish Council	31	Strategic Infrastructure Needs Public Transport provision: suggest renaming as 'public and community transport provision'.		The Public Transport strategy for the site will include community transport provision as necessary and hence no change is recommended.
8	South Marston Parish Council	32	Strategic Infrastructure Needs Contributions to health provision - see overall comments above and in particular contributions to dispersed healthcare which may be shared or be		The Council will continue to work proactively with healthcare providers to secure appropriate provision at the district centre and at other locations where necessary.
8	South Marston Parish Council	33	Evidence Base: add: Draft South Marston Village Neighbourhood Plan (SMNP) 27.03.2016		Noted. Reference made in the South Marston Village Proforma and Rowborough village proforma

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10	Swindon Bicycle Users Group	1	<p>The Cycling Framework for Swindon was recently (14 April) adopted by Swindon Borough Council. The Framework includes in its Vision (p6: emphasis by BUG) that:</p> <p>The planned growth provides an ideal opportunity to set the tone for cycling in the borough and its vision for 2026. The network should provide a seamless door to door journey with a network of primary, secondary and tertiary interlinked routes.</p> <p>The vision of cycling in 2026 will be of new homes with appropriate places to store cycles. Residents will be able to cycle in safety and confidence along residential streets where 20mph zones are the norm. These connect to a secondary route network of quiet residential streets with appropriate speed controls. The secondary routes will connect to the primary routes with good quality and continuous cycle provision to get people to places of work, education, shops and leisure. Once at the place of work, secure cycling parking and changing/shower facilities will normally be provided by employers.</p>	Update Masterplan	Noted. The Masterplan has been updated to include cycle routes, and detailed points are addressed in the Framework Travel Plan for the NEV and assessment of detailed Transport Assessments with all planning applications.

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10	Swindon Bicycle Users Group	2	On the Draft illustrative Masterplan and related plan extracts, we cannot distinguish cycling provision from provision for walkers. They are not the same thing. For example, some of the indicated routes (OK, outside the red line boundary) are currently suitable only for walking, and we assume that there are no plans to convert them into cycle paths. Cycling provision should be distinguished from walking provision on the Masterplan.		This is a broad based Masterplan and this level of detail, whilst important, will be carefully considered and resolved at a subsequent stage. Specification for road network will be carefully considered at design stage. Highest category of roads will have joint-use footpath-cycleway provision behind roadside verge(s).
10	Swindon Bicycle Users Group	3	<p>The cycling and walking provision shown appears to be less comprehensive than the cycling provision we had expected. For example:</p> <p>The draft plans for Lotmead Village, in which provision was shown alongside primary and secondary streets. This is not shown on the Draft illustrative Masterplan nor its extracts in the Draft Village Proformas and Infrastructure Requirements.</p> <p>There is no indication of any cycling or pedestrian connectivity at or leading up to the White Hart junction, nor across Great Stall Bridge.</p>		The Masterplan is presented at a very large scale where the finer detail of 3.5m wide segregated cycleways cannot be shown. These are however considered in the emerging Framework Travel Plan for the NEV, which aims to secure cycleways alongside all primary and secondary routes, along with recreational routes, and this provision will also be considered in Design Codes and planning application detail.
10	Swindon Bicycle Users Group	4	The Draft Village Proformas and Infrastructure Requirements do not make it clear whether all of the required cycle provision is included.		Point noted. The village proformas will be updated to ensure there is reference to the requirement for cycleways.

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10	Swindon Bicycle Users Group	5	No cycling route is shown that would give proper access to several of the schools, including the secondary school and the primary schools in Rowborough, Lotmead, Lower Lotmead and Redlands Villages. This can't be right!		Cycle/Rights of Way network is illustrated only where it deviates away from the Road Network and forms a recreational or green route. The road network will incorporate on and off-carriageway cycling and this will be considered through Non-Motorised User audit and is subject to consideration in the emerging Framework Travel Plan. The application of this recreational and road corridor based cycle network ensures all key destinations are catered for.
10	Swindon Bicycle Users Group	6	Only two cycle/pedestrian crossings are shown for the railway/A420. For reasonable permeability, 4 crossing points should be provided (at roughly the recommended grid spacing of 250m).		The Village Proforma's have been addressed to include Footpath 5 crossing of the railway, along with use of the existing accommodation tunnels (wherever possible) to the east of Old Vicarage Lane and a new Railway tunnel providing access to Rowborough Village. These railway crossing points are further associated with crossing points on the A420 as secured through the relevant proformas.
10	Swindon Bicycle Users Group	7	Three crossings appear to be shown over the A419 heading in to Dorcan. Are we to interpret all of these as proposed crossing points for cyclists? If so we would be surprised: but would welcome them!		The crossing points shown on the A419 represent existing Public Rights of Way crossing points that are uncontrolled and are not proposed for alteration. Crossing points over the A419 are however to be provided by controlled at grade crossing points at White Hart, possible retention of the existing footway/cycleway bridge at White Hart and the provision of the new Public Transport, cycle and pedestrian bridge called Great Stall Bridge.

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10	Swindon Bicycle Users Group	8	Wanborough Road. There appears to be one crossing point shown, and two points at which walking and/or cycling routes terminate at the Wanborough Road. Yet there is no provision shown along Wanborough Road. This suggests a dangerous situation in which cyclists and/or walkers are encouraged to get to Wanborough Road but then cannot progress safely along it in either direction.		<p>The Redlands, Foxbridge and Lotmead Village Proforma's now include the following requirement:</p> <p>To provide a walking and cycling network that integrates with existing networks and provides good connectivity within the development and to the surrounding area incorporating community and recreational routes, to facilitate links with proposed primary, secondary and further education facilities, the District Centre and Employment areas within the NEV development and also between Covingham and Wanborough along Wanborough Road.</p>
10	Swindon Bicycle Users Group	9	<p>White Hart junction. It is important that cyclists should be able to navigate this junction safely. Our earlier corridor analysis identified the importance of this point in the network for:</p> <ul style="list-style-type: none"> • Access to the existing network for journeys to the town centre; • Access to existing / improved network heading north/northwest to the Orbital, NCNR45 (north) and countryside and leisure destinations out towards the Cotswold Water Park. 		Agreed. Safe provision for cyclists will be considered as part of the planned improvements to this junction, where at grade Toucan Crossings are currently proposed along with possible retention of the existing bridge.
10	Swindon Bicycle Users Group	10	Access to the Downs. Given the location of the NEV, it would surely be a good thing to identify access by bike or foot to the nearby wonderful countryside. This isn't obvious from the plan.		Noted. The opportunity to provide additional walking/cycling routes will be considered as part of the overall planning of the NEV.

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10	Swindon Bicycle Users Group	11	Within NEV development. We had earlier recommended that "Routes should be overlooked, direct, legible, prioritised". We are particularly concerned that the routes indicated on the draft Masterplan are not, in general, overlooked. This will contribute to a perception of danger (whether justified or not) and act as a disincentive to unconfident cyclists.		Agreed. Detailed planning of routes will ensure community surveillance wherever possible. Clear signing will be provided and Toucan crossing points provided at key points of the major road network.
10	Swindon Bicycle Users Group	12	In each chapter (South Marston Village (expansion), Rowborough Village, etc.) there is a requirement to contribute to shared infrastructure, including "Contributions towards the footbridge (FP5) over railway". We believe this bridge should carry a footpath AND a cycle path, and contributions towards this should be sought from all developers.		The contributions towards the footbridge (FP5) will be shared between multiple villages (but not all that are proposed at the NEV, namely South Marston, Rowborough, Great Stall East and Great Stall West). The specification of the bridge will ensure that it can be used by both pedestrians and cyclists and will be fully DDA compliant.

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10	Swindon Bicycle Users Group	13	<p>Each chapter contains a requirement in the Local Infrastructure Needs section to "To provide walking and cycle network improvements that integrate with existing networks and provide good connectivity within the development and to the surrounding area (including the provision of bridleways)."</p> <p>This is good: however, this appears it is not clear that this will capture all of the cycling provision that will be required. For example:</p> <ul style="list-style-type: none"> o There is no indication of how cycling provision will link to existing networks. o No boundaries are shown between the different developments. If there are any gaps (for example, to accommodate green infrastructure) then some cycling provision may be missed; 		Point noted. The Village Proforma's have now been altered to reflect the securing of a cycle network to connect to surrounding areas and existing infrastructure. The links between the development boundaries is captured in the contributions to linkages between the development islands.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
10	Swindon Bicycle Users Group	14	<p>In the chapter on Rowborough Village, the developer is required to "construct a new road link" under the railway.</p> <p>- On the plan, a cycle or walking (or both?) path is shown near the eastern boundary of the NEV area to cross the A420, yet the developer is not required to provide or contribute to it. Nor is this covered in the chapter on Great Stall East, which might be the other possibility;</p> <p>- The plan shows two road links under the railway. The existing one (Carpenter's Arms) will need to be enhanced to carry traffic. This should be a requirement placed on the developer.</p> <p>- An additional link across railway/A420 should also be provided, to the west of the new proposed crossing</p>		Improvements and control to the use of the Carpenters Arms tunnel and the implementation of crossing points on the A420 and under the railway are included in the Local Transport requirements in the Rowborough Village Proforma.
10	Swindon Bicycle Users Group	15	<p>The draft illustrative Masterplan shows three foot or cycle (or both?) E/W crossings of the A419 towards Covingham / Dorcan, reflected in the map of the Foxbridge Village development. No developer is required to construct or to contribute specifically to these. Yet the South Marston Village developer is required to provide " cycle network improvements " across the railway and A4202.</p>		The crossing points shown on the A419 represent existing Public Rights of Way crossing points that are uncontrolled and are not proposed for alteration. Crossing points over the A419 are however to be provided by controlled at grade crossing points at White Hart, possible retention of the existing footway/cycleway bridge at White Hart and the provision of the new Public Transport, cycle and pedestrian bridge called Great Stall Bridge.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
10	Swindon Bicycle Users Group	16	Each chapter contains a requirement (in the Strategic Infrastructure Needs (Shared) section) for "Contributions towards the linkages between development islands, and with the existing community." Some of these are phrased slightly differently ("Contributions towards the bridging structure linkages ...), which may mean something different. This is not clear.		Agree. The Strategic Infrastructure Needs has been altered for each development parcel to consistently require 'Contributions towards the linkages between development islands and with the existing community'.
10	Swindon Bicycle Users Group	17	The Strategic Infrastructure Needs (Shared) also require developers to contribute to Sustainable Transport Solutions (although this is called "Travel Plan" in many of the chapters) yet cycling is not mentioned as one of the Solutions required. This suggests that developers will not be required to contribute to cycling infrastructure.		Cyclists will be required to contribute to networks to accommodate all user groups: the Village Proforma's have been amended.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
10	Swindon Bicycle Users Group	18	<p>In the Infrastructure Delivery Plan only two mentions of cycling occur – for Great Stall Bridge and the new link across the railway at footpath 5.</p> <p>Cycling is mentioned nowhere else leading to the impression that most cycling provision will not be delivered. It does not get a look in other places where you might expect it to occur:</p> <ul style="list-style-type: none"> o Highway links between development islands; o Southern Connector Road or A420 Highway Improvements (alongside which provision must surely be made?); o White Hart Junction Improvements (across which provision must surely be made?); o Framework Travel Plan (unless it's covered under the catch-all reference to "encourage sustainable modes"); o The section on Leisure Facilities. 		<p>The Village Proforma's have been addressed to cover cycling. Where the specification is not however explicit, i.e. along the Southern Connector Road or development island linkages, walking and cycling will be considered through mode hierarchy assessment in the form of a Non Motorised User Audit as dictated by Central Government Guidance.</p>
10	Swindon Bicycle Users Group	19	<p>Comments from the sections above carry over as appropriate into our comments on the SPD, including:</p> <p>Table 1 on p13 contains no reference to any cycling infrastructure to be provided, even though Policy NC3 specifically includes walking and cycling infrastructure in its scope. Walking and cycling infrastructure meets the three tests mentioned in para 2.2 on p4 as being necessary, directly related and proportionate. It also meets the requirements of each of the five tests described in Policy IN1: Infrastructure Provision.</p>		<p>A walking and cycle network is now included in the Village Proforma's.</p>

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
10	Swindon Bicycle Users Group	20	The reference to Footpath 5 in Table 1 does not make it clear that this should include provision for cyclists.		Conversion of footpath 5 to a footway/cycleway is now included in the revised proforma.
10	Swindon Bicycle Users Group	21	<p>BUG also supports comments from the Wilts and Berks Canal Trust: a cycle path alongside the canal will add an important element to cycling provision in the Eastern Villages, improving access to the wonderful surrounding countryside</p> <ul style="list-style-type: none"> - It's very good to see that the protected canal route has been included - The construction of the canal must be included as part of the New Eastern Villages infrastructure - The canal should be funded by the developers - The canal offers opportunities for flood relief and land drainage - The canal offers a wonderful opportunity to make a distinctive character for the New Eastern Villages - Working canals in other location have created property uplift, and will do so here as well - A built canal will create both recreational and leisure assets as well as improving people's well-being - A built canal will create wildlife habitat assets and increase biodiversity 		Support noted.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
11	Ainscough Strategic Land	1	<p>In regard to the Framework S106 Agreement, Para 2.19 states that "land will be safeguarded for a specific purpose and guarantee access across land at nil cost to facilitate delivery of infrastructure that spans across two or more different land ownerships".</p> <p>We have made observations on this point previously, and suggest that whilst the sentiment may be good, the realities of achieving this is best approached through appropriately worded S106 agreements. It is our view that this has not been reflected within the granting of outline and reserved matters permission relating to the DB Symmetry site 'The Hub'.</p> <p>The Council needs to be absolutely clear and precise in future Agreement negotiations and discussions. ASL's concerns in relation to the phasing and deliver of the north-south link road have been well documented within letters of representation to the recent reserved matters application (Ref: 15/1522) and thus are not rehearsed again here.</p>		<p>The SPD has been revised to provide further clarity on a framework Section 106 Agreement. Please refer to Section 2 of the SPD.</p>

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
11	Ainscough Strategic Land	2	<p>In relation to the NEV Phasing Plan, Para 4.17 of the SPD states that "If planning applications are submitted in advance of the Phasing Plan, the onus will be on the developer to deliver the appropriate level of infrastructure to support the new community until such time the delivery of other development parcels/villages come forward".</p> <p>It is ASL's view that the infrastructure needs of an individual development village should be subject to a Transport Assessment rather than being tied to fixed infrastructure requirements. This is on the basis that overall housing delivery could be significantly adversely affected if an earlier phase of development is either delayed or halted - thereby constraining other schemes from being brought forward.</p>		<p>Section 2 of the SPD, the indicative delivery areas detailed in the Local Plan helps to identify the Council's preferred approach to the phasing of the housing and the related infrastructure to support the new communities at the NEV. If planning applications are submitted in advance of the preferred phasing, the onus will be on the relevant developer(s) and/or interested parties to deliver the appropriate level of infrastructure to support the new community until such time the delivery of other development parcels / villages come forward.</p>

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
11	Ainscough Strategic Land	3	<p>Whilst it is noted that the draft illustrative Masterplan has evolved from the previous version that was circulated in 2014, it does not accurately reflect the emerging development proposals that form the basis of the three major applications currently awaiting determination by Swindon Borough Council (SBC), namely:</p> <ul style="list-style-type: none"> - Hallam Land Consortium (South Marston and Rowborough) - Ref: 13/1555; - Barberry Estates (Redlands Airfield) - Ref: 16/0021, and - ASL (Lotmead Farm Villages) - Ref: 15/0753 and 15/0754. 		<p>Point noted. However the purpose of the SPD and the accompanying documents including the Masterplan is to ensure that the key principles of delivering comprehensive and sustainable development at the NEV (as outlined in NC3) can be achieved. It is not the purpose of the SPD to address detailed matters that relate to specific planning applications.</p>

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
11	Ainscough Strategic Land	4	<p>The key fundamental differences between the illustrative Masterplan and ASL's proposed development are:</p> <p>1. The omission of any housing development to the west of the proposed access route from Wanborough Road on the illustrative Masterplan;</p> <p>2. The siting of the primary school and local centre within Lotmead as shown on the illustrative Masterplan is inconsistent with what is proposed within ASL's planning application as submitted in May 2015. The work undertaken to inform the positioning of the primary school within ASL's planning application has been considerable and should logically inform the illustrative SPD Masterplan;</p> <p>3. The illustrative Masterplan includes provision for a primary school within the Lower Lotmead village, whereas ASL is not proposing a primary school within this village as part of its planning application (a matter explored in further detail below) following extensive pre-application discussions.</p>		<p>1. This parcel is subject to an Historic England objection (applications S/OUT/15/0753 and S/OUT/15/0754).</p> <p>2&3. The LEA require two Primary Schools. No amendment made.</p> <p>4. No change proposed. The alignment of the SCR will be subject to detailed design at reserved matters stage(s) of planning applications.</p>

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
			4. The indicative route of the southern connector road needs to be fully consistent with what is proposed within ASL's application. At present, there appear to be differences (most notably in regard to the south western element of Lotmead.		
11	Ainscough Strategic Land	5	In terms of the wider Masterplan and land falling outside of ASL's control, we would query why there is no primary school shown within the development village situated to the west of Lotmead (given that it has been identified as an individual village that will deliver approximately 850 dwellings - "Upper Lotmead") within the associated Draft Village Proformas document.		Please refer to Section 2 of the SPD, the indicative delivery areas detailed in the Local Plan helps to identify the Council's preferred approach to the phasing of the housing and the related infrastructure to support the new communities at the NEV. If planning applications are submitted in advance of the preferred phasing, the onus will be on the relevant developer(s) and/or interested parties to deliver the appropriate level of infrastructure to support the new community until such time the delivery of other development parcels / villages come forward.
11	Ainscough Strategic Land	6	We also consider that the southern boundary of the Masterplan area should be amended in the vicinity of Wanborough Road/Redlands island to reflect detailed design solutions being brought forward at the outline planning application stage. We attach a red line plan showing suggestions for an amendment to the boundary at this	We attach a red line plan showing suggestions for an amendment to the boundary at this point.	The NEV boundary shown on the Masterplan is consistent with the boundary shown in the Local Plan. On this basis, the boundary cannot be changed.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
11	Ainscough Strategic Land	6	Furthermore, it is noted that there are 3 separate crossings of the River Cole, with provision of two further links. Whilst the Infrastructure Delivery Plan apports a total of £4.7 million to meet the cost, there is potential for additional expense to enable the crossings to meet relevant crossing guideline standards. Clarity is required in regard to whether any additional expense would be met by funds included within the wider shared infrastructure pot.		The Masterplan illustrates an overall highway network that will provide efficient and necessary road access to the NEV.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
11	Ainscough Strategic Land	7	Clearly, it is important to ensure that the delivery of required infrastructure is fairly apportioned between contributing developments to ensure that the costs are shared equally between different development schemes.	<p>It is accepted that a degree of flexibility should be applied in regard to the masterplan, given that it is "illustrative" in nature and will not be utilised in an overly prescriptive manner in regard to setting the parameters for development proposals within the NEV.</p> <p>At present however, the discrepancies noted above are considered significant and need to be addressed within a revised version of the illustrative masterplan to accurately reflect ASL's development proposals.</p>	The Council understands the complex land and ownership arrangements at the NEV. In line with the comprehensive approach required by Policy NC3, the Council will seek from landowners / developers a consortium approach to enter into s106 planning obligations for the purpose of securing equitably and fairly the delivery of infrastructure which is necessary in order to deliver comprehensive and sustainable development.
11	Ainscough Strategic Land	8	As a general comment, it is suggested that a copy of the wider illustrative Masterplan should be incorporated within the finalised document for ease of reference.		Agree.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
11	Ainscough Strategic Land	9	In regard to the general phasing of the NEV, South Marston and Rowborough (to the north of the A420) are identified as forming the first phase of development, with Phase 3 comprising Foxbridge and Redlands at the southern end of the NEV. All other development parcels, including land falling within ASL's ownership, are represented as Phase 2.		Noted.
11	Ainscough Strategic Land	10	<p>It should be noted that Point 11 of the Statement of Common Ground between SBC and the various NEV developers (which was prepared to assist the Local Plan Examination process) supports development coming forward outside of the north-south phasing plan if suitable access is available. In these terms, the document states (for example, subject to testing, the existing access off Wanborough Road could be utilised).</p> <p>Although it is noted that the proposed development phasing schedule is not a prescriptive policy requirement, it does not accurately reflect how the NEV will be realistically built out.</p>		<p>The Joint NEV Statement of Common Ground does not refer to the existing access off Wanborough Road.</p> <p>If planning applications are submitted in advance of the preferred phasing, the onus will be on the relevant developer(s) and/or interested parties to deliver the appropriate level of infrastructure to support the new community until such time the delivery of other development parcels / villages come forward.</p>

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
11	Ainscough Strategic Land	11	<p>As outlined within ASL's planning application submissions, phasing of the NEV should be approached in a manner that will enable development to respect the employment and district centre (situated adjacent to the eastern edge of Swindon directly south of the A420) whilst infrastructure, both existing and planned will enable individual villages to be built out concurrently over the Local Plan period.</p> <p>This approach will help to ensure that the required transport and green infrastructure provision can be provided for the relevant phases of development and further expanded as subsequent phases are built-out. Furthermore, given the nature of the wider NEV development area, it is appropriate to incorporate a number of access points, including from the north (A420), west, and south (Wanborough Road), to enable development to commence in several locations, which will assist in delivering the required housing numbers in accordance with the proposed trajectory.</p> <p>Such an approach will enable the NEV to be developed by a number of house builders in different locations throughout the area, encouraging the widest choice in terms of size, type and design of unit to accord with the NPPF. Accordingly, issues such as design and interconnection can be positively addressed from the outset, which creates</p>		<p>SBC welcome the delivery of housing etc. in a multitude of areas across the NEV, however these need to be compliant with Local Plan Policy and therefore the utilisation of a multitude of access points needs to be weighted against the provision to avoid rat-running through adjacent communities. In this regard, large scale phased development may be permitted with appropriate access delivered from the A420, including strategic infrastructure delivery, or the Southern Connector Road, but any development served from Wanborough Road would have to illustrate a nil detriment to local villages and significant connectivity to the principal road network.</p>

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
			the optimum opportunity for the market to deliver housing and associated development in line with the Council's time and policy objectives.		
11	Ainscough Strategic Land	12	In general terms, the infrastructure requirements set out for each development village (whether those are site specific or NEV wide requirements) are broadly consistent.		Point noted.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
11	Ainscough Strategic Land	13	<p>The significant exception to this, however, is education. Redlands and Foxbridge (page 21 and 25 respectively) are listed as needing to set aside land for the "future delivery" of a 2 FE primary school within the respective development proposals, whereas ASL's landholding (namely Lotmead and Lower Lotmead villages) are required to deliver a primary school within each site at the outset.</p> <p>Notwithstanding this seemingly inconsistent approach, the requirement of both Lotmead and Lower Lotmead to deliver a 2 FE primary school does not reflect ASL's recent (and on-going) discussions with SBC's Education Commissioner Gareth Cheal - with the approach to provision of education facilities at Lotmead not being justified or evidenced.</p> <p>Clearly, it is important that the delivery of infrastructure is borne fairly and appropriately between contributing developments to ensure that the costs are shared equally between different development schemes, and that larger development proposals are not liable to contribute a greater proportion of the necessary costs than they should.</p>		Agree that the cost of infrastructure should be fairly apportioned to all developers.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
11	Ainscough Strategic Land	14	<p>It is ASL's view that SBC's request for Lotmead and Lower Lotmead to incorporate 2x2FE primary schools is unjustified on the following grounds:</p> <ul style="list-style-type: none"> - There is insufficient evidence to justify SBC's assumption that a 50% increase in peak pupil demand will be generated as a result of ASL's proposed development; - SBC's request for a transfer of land to address this temporary peak is disproportionate, And - SBC should utilise existing surplus capacity in the first instance (an approach which is consistent with that outlined within the Swindon School Place Planning Study (March 2011). Please refer to the attached letters prepared by ASL's education consultant TLP(dated 28th January 2016 and 29th April 2016) which provide further justification in regard to this point. <p>Accordingly, this requirement conflicts with guidance set out within the CIL Regs (2010), which confirm that planning obligations need to comply with the following criteria in order to be enforceable:</p>		The Council's evidence base in relation to school place need justifies two school sites.

Rep no Organisation

Comment No Justification

Proposed changes

Officer response

- They must be necessary to make the development acceptable in planning terms;
- They must be directly related to development, and
- They must be fairly and reasonably related, to the proposed scheme, in scale and kind.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
11	Ainscough Strategic Land	15	<p>Aside from the above considerations, further clarification is sought in regard to the following specific items:</p> <ol style="list-style-type: none"> 1. In regard to strategic infrastructure requirements, it is noted that a Post-16 financial contribution is required for Lotmead and Lower Lotmead, Foxbridge, Redlands, Upper Lotmead, Great Stall West. However, South Marston, Rowborough and Great Stall East are excluded from this requirement; 2. Whether the new 8-10 FE secondary school which is proposed for the NEV (at Great Stall East) is only to take pupils to age 16; 3. There is no requirement for specific provision or a financial contribution in regard to the delivery of a primary school in Great Stall West, although a financial contribution is required for secondary, post 16 and SEN, and 4. It is not clear whether the need to widen the A420 between the western site access and Gablecross in a westbound direction (as originally outlined within the Eastern Villages Transport Study Report (April 2011)) is included as part of the A420 Highway 		<ol style="list-style-type: none"> 1. Both South Marston and Rowborough village proformas include a reference to Post-16 financial contributions. However, Great Stall East does not reference contributions to Post-16 education as this proposed village will be facilitating the delivery of the Secondary School (including Post-16 provision) on-site [check response] 2. Great Stall East village will also provide for Post 16. The village proforma will be amended to reflect this. 3. Point noted. Contributions towards Primary School provision will be added to the Great Stall West proforma. 4. To be confirmed following further transport assessment.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
			improvements.		
11	Ainscough Strategic Land	16	The IDP indicates that contributions will be sought from "developers/s106/local growth fund". The draft Village Proformas indicate that contributions will be pooled between the nine separate development villages, whilst the Planning Obligations SPD confirms that this will be refunded if Local Growth Funding is secured. As discussed in paragraph 2.4 of the Planning Obligations SPD, CIL Regulations (namely Reg 123) restrict contributions being pooled from more than five separate planning obligations for a specific item of infrastructure. It is unclear how this system would operate;		Under Regulation 123, the Council will take into consideration the impact of the s106 pooling restriction for planning obligations current at the time of the SPD adoption, when negotiating contributions to be secured by planning obligations. The Council will seek from landowners / developers a consortium approach to entering into s106 planning obligations for the purpose of securing equitably and fairly the delivery of infrastructure which is necessary in order for development to go ahead.
11	Ainscough Strategic Land	17	Funding arrangements for the Southern Connector Road (page 2) do not appear to incorporate the Local Growth Fund Allocation. This could place an undue burden on ASL and the viability/deliverability of the Lotmead Villages;		The Local Growth Fund Allocation is provisional, and subject to detailed Business Case which the Council are currently working on.
11	Ainscough Strategic Land	18	It is unclear how highway linkages between development islands (page 3) are to be funded and delivered when they fall outside of the applicant's redline or extent of ownership;		Each Village Proforma has been altered to secure 'contributions towards the linkages between development islands and with the surrounding community'. Wherever possible, SBC will seek for the linkages to be delivered by developers, but where this is not possible SBC will utilise the contributions to progress and implement the linkages in a timely manner.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
11	Ainscough Strategic Land	19	Secondary and Primary SEN is to be funded through SBC Capital programme and CIL not S106		Agree. Deleted
11	Ainscough Strategic Land	20	It is unclear in regard to how the S106 contributions will be calculated and whether the formula included in the "New Eastern Villages Mitigation Works West of A419 and Apportionment of Impacts, March 2014" will still be applied.		The current proposed approach is to incorporate the strategic Transport and Movement Infrastructure into a single transport package, thereafter development contributes to this package in accordance with their proportional scale; e.g. number of dwellings delivered as a proportion of the allocated 8000 dwellings. This approach reflects and respects the single allocation of the NEV and the requirement for comprehensive development.
12	Barberry (Swindon) Ltd	1	<p>Draft SPD, page 6, paragraph 2.13. We note the reference to encouraging landowners and developers to enter into a Framework agreement. On the basis that this may not be possible we suggest that the following wording should be added for clarification:</p> <p>"The Council will negotiate separate, stand-alone agreements with landowners and developers who are prepared to make contributions for on and off site infrastructure provision in general accordance with the draft SPD and draft VPIR."</p>		The Council consider that in the interests of delivering that to ensure a fair and equitable distribution of the necessary planning obligations, a framework Section 106 Agreement will ensure the effective delivery and maintenance of the required infrastructure.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
12	Barberry (Swindon) Ltd	2	Again, we suggest there is a reference to individual Section 106 agreements being negotiated where the principle of contributions to on and off site infrastructure provision can be agreed with a landowner/developer. (Note: Our comments here should be considered in the light of our representation regarding Draft SPD, paragraphs 2.20 - 2.22 below.)		The Council consider that in the interests of delivering that to ensure a fair and equitable distribution of the necessary planning obligations, a framework Section 106 Agreement will ensure the effective delivery and maintenance of the required infrastructure.
12	Barberry (Swindon) Ltd	3	We note that the Council may seek to amend the IDP and seek further contributions from NEV related development. We advise that this approach is unacceptable since clearly any intent to introduce new infrastructure items or costings could affect the viability of schemes already negotiated. Therefore, it must be clear that any additional items sought must be fully justified on the basis of guidance set out in the Framework and CIL regulations. It will also need to be explained why these matters cannot be provided by the public purse given that they should have been identified at the outset of the development. The representor would object to any suggestion that Section 106 Agreements should be varied throughout their life if new circumstances are identified by the Council in the future.		The Council agree that any changes to the infrastructure items and/or costs will be subject to public consultation, as stated in Paragraph 1.16 of the SPD. The evidence base for additional items and alterations to costs will be detailed in the NEV IDP.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
12	Barberry (Swindon) Ltd	4	Equalisation Agreements. We consider that this is a matter for the Council to take the lead on and should hold and distribute any monies arising.		In line with the comprehensive approach required by Policy NC3, the Council will seek from landowners / developers a consortium approach to enter into planning obligations agreements, pursuant to S106 (Town and Country Planning Act) or S278 (Highways Act), for the purpose of securing equitably and fairly the delivery of infrastructure which is necessary in order to deliver comprehensive and sustainable development.
12	Barberry (Swindon) Ltd	5	The objector agrees that Figure 1, New Eastern Villages Draft Illustrative Masterplan is appropriate for general purposes and notes that development proposals should be in "broad accordance" with the plan. We consider that further text should be added to paragraph 4.9 which states that "individual proposals will be based upon a more detailed Masterplan and reserved matters applications".	We consider that further text should be added to paragraph 4.9 which states that "individual proposals will be based upon a more detailed Masterplan and reserved matters applications".	Point noted, however consider additional wording suggested is not necessary.
12	Barberry (Swindon) Ltd	7	Table 1. The Police Station access improvements should be specific to that particular development and should not be a shared cost item.		All NEV traffic will have an opportunity to utilise the A420 where this junction presents a constraint. All NEV development should therefore pay for it's upgrade.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
12	Barberry (Swindon) Ltd	8	Table 1. The Footpath 5 railway crossing improvements should be a site specific item, not a shared one.		Footpath 5 railway crossing provides connectivity for those willing to walk between the northern residential islands south of the A420 and employment at Honda etc., and residential islands to the north of the A420 with Symmetry Park and the District Centre. In this regard, SBC are seeking contributions from those island developments that would derive benefit from the railway crossing, to maximise its delivery potential.
12	Barberry (Swindon) Ltd	9	The park and ride scheme needs to be considered carefully since it is likely that many of the users will not be from the NEV area but will be from other parts of Swindon or indeed outside of the Borough. Therefore the true impact of the NEV needs to be considered in terms of setting a contribution to this development.		The Park and Ride scheme will indeed provide an opportunity for both NEV residents, patrons and employees to travel by bus, but also those travelling further afield. The Park and Ride will therefore have the potential to mitigate the impact of the NEV and further reduce background traffic flows allowing NEV traffic to have improved access to the wider highway network. It is therefore deemed appropriate and reasonable for the park and ride provision to be secured against the NEV and for contributions to be sought. The Village Proforma's have been addressed to reflect this.
12	Barberry (Swindon) Ltd	10	We consider that South Marston Primary School expansion should be a site specific matter.		The expansion of South Marston Primary School is identified as a site specific requirement as detailed in the South Marston Village Proforma.
12	Barberry (Swindon) Ltd	11	The provision of healthcare facilities needs to be considered carefully since these may be provided by the private sector and need not require developer contributions. This point needs to be explored in more detail.		The Council are working closely with health care providers to ensure appropriate facilities are provided both locally (where required) and strategically through the delivery of a doctor's surgery at the district centre.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
12	Barberry (Swindon) Ltd	12	Public open space. We do not consider that contributions to Central Area Public Realm works is justified. We do not consider that there is any evidence of harm arising which needs mitigation.		Point noted. The requirement for contributions towards Central Area Public Realm will be reviewed in any subsequent revision to the SPD.
12	Barberry (Swindon) Ltd	13	District heating network. This should be removed as a required infrastructure item.		The adopted Swindon Borough Local Plan requires development at strategic allocations to incorporate infrastructure for the district heating network where possible.
12	Barberry (Swindon) Ltd	14	We consider that in general the Council needs to review some of the infrastructure items and their costings to see if "pooling" can provide more cost effective solutions. For example, the identification of ambulance bays needs to be considered in the context of the provision of other community facilities since it might be possible to incorporate this requirement into other facilities, thereby achieving cost savings. This principle needs to be adopted across the whole IDP.		Maximised efficient use of land will form a priority for the NEV, and this may include multiple use buildings, open areas and highway/parking infrastructure.
12	Barberry (Swindon) Ltd	15	Main Land Uses. We acknowledge that the Illustrative Masterplan shows additional development in areas to the north and we have no objection to these being incorporated within the Redlands development area. We believe, however, the inclusion of this land will increase the overall potential capacity to 500 - 575 units depending on whether or not the two form entry primary school is provided. The text should be amended accordingly.		Capacity would be determined through detailed planning applications.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
12	Barberry (Swindon) Ltd	16	Reference to "Community Hub" under "Main Land Uses", "Land Required" and "Community Facilities". We do not consider that the Redlands village will justify the provision of a 'community hub'. We do envisage bringing forward a village shop which will be located close to the school and areas of main open space and believe this will be sufficient on site provision for Redlands.		Noted.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
12	Barberry (Swindon) Ltd	17	<p>Anticipated Delivery. It is apparent that the outline planning application at Redlands is progressing well and we see no reason for the delivery of Redlands to be delayed to Phase 3 when clearly it could come forward much earlier. The text should be changed to read as follows: 'Anticipated Delivery: could be delivered in Phase 1 subject to appropriate infrastructure provision.'</p> <p>We consider that this is a very important point given:</p> <ol style="list-style-type: none"> 1. The need to deliver housing across the NEV in general; so far, there are no implementable permissions in place for the major housing areas and it is important that sites which are capable of early delivery in Swindon can be achieved. 2. The need to achieve a five year housing land supply in Swindon. The Council is currently facing a five year housing land supply shortfall. The release of sites such as Redlands, which is identified for development in the Swindon Local Plan, would accord with the policies of the Framework which require Councils to maintain a five year supply of housing. 3. The Framework's requirement to boost significantly the supply of housing land. 		The anticipated delivery information is consistent with the indicative delivery as shown in Figure 11 of the Local Plan 2026.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
12	Barberry (Swindon) Ltd	18	Residential. The second bullet point referring to affordable housing should be amended by the addition of the following wording: "subject to viability".		There is a policy requirement to deliver 30% affordable housing on site. This requirement is made clear in the Redlands village proforma.
12	Barberry (Swindon) Ltd	19	Transport and Movement. The first bullet point should be amended by the insertion of the words, "or provide funding for" after "construct". The second bullet point should be amended by insertion of the words "or funding for such improvements," after "improvements".		SBC will seek for all on-site transport and movement infrastructure to be delivered by on-site developers, through their build programme.
12	Barberry (Swindon) Ltd	20	Green Infrastructure, Leisure and Heritage. The reference to on site sports pitch provision should be removed. It has been agreed with the Council that formal pitch provision will be located elsewhere in the NEV. The text should be amended accordingly; informal recreation and children's play spaces will be provided on site.		In policy terms, the approach is to secure open space provision onsite. Only exceptional circumstances will off site contributions be secured.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
12	Barberry (Swindon) Ltd	21	<p>Transport and Movement.</p> <ul style="list-style-type: none"> Any contributions towards 'bridging structure linkages' should be proportionate to the scale of development and impact arising. This should be explained in supporting text in the main SPD. We object to the reference to contributions to the footbridge over the railway which is disconnected from the Redlands scheme. This element should be removed as we see no justification under Framework or CIL policy for this element of infrastructure. 		<p>Noted. The highway links between the development islands will be an apportioned contribution that is strategically shared across all the proposed villages.</p> <p>The requirement to contribute towards the provision of the footbridge over the railway has been removed from the Redlands Proforma due to unrealistic commuting walking distances.</p>

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
12	Barberry (Swindon) Ltd	22	<p>Community Facilities. We object to the provision of community facilities identified on the following basis:</p> <ul style="list-style-type: none"> •It has not been demonstrated that a GP surgery cannot be provided by private sector funding. In our experience GP surgeries are generally provided by the private sector these days and there is no evidence that this cannot take place here. •It is not clear what adult and children's social care facilities will need to be provided on site. Contributions should only be for physical infrastructure and their ongoing maintenance and should not be used to fund streams. This should be funded by Council tax as it is an impact arising from the activity of occupants. •It is not clear that a strategy for library provision has been identified which would justify contributions. •We are not satisfied that justification has been provided for capital expenditure and maintenance payments for local health provision. •We are not satisfied that justification has been provided for contributions for the provision of physical infrastructure and maintenance of community safety facilities. 		The items identified in the IDP are critical to achieving sustainable development at the NEV. Further explanation is provided in the IDP.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
12	Barberry (Swindon) Ltd	23	<p>Green Infrastructure, Leisure and Heritage.</p> <ul style="list-style-type: none"> • We are not satisfied that justification for the provision of a 25 metre swimming pool has been provided. This is an expensive piece of infrastructure and we have not seen justification for its provision in the NEV. • Any reference to contributions towards the management and maintenance of parish owned open space facilities must be on the basis that such payments are only made in respect of impact arising from the development and the necessary mitigation to overcome this impact. • Contribution to Central Area Public Realm. We object to this element since we see no connection between development at the NEV and the provision of improvements to the central area public realm. 		<p>There is a policy requirement to deliver a leisure facility at the NEV to support the new community. The contribution and cost for a 25m swimming pool has been informed by Sport England's facilities model. The contribution for Central Area Public Realm has been removed. All contributions secured must be directly related to the NEV and fulfil the tests as set out in the CIL Regs and detailed at para 2.2 of the SPD.</p>
12	Barberry (Swindon) Ltd	24	<p>Other Considerations.</p> <ul style="list-style-type: none"> • We object to the reference to contributions to district heating. This is a private sector funding matter and should not require contributions to be made to a scheme which has not yet been proven to be needed or viable. 		<p>Consistent with Policy DE2.</p>

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
13	Hannick Home and the Peploe Tru	1	Notwithstanding the informative status of the draft Proformas, we consider that the wording must allow sufficient flexibility to aid the timely delivery of appropriate and proportionate infrastructure items contained therein.		Noted.
13	Hannick Home and the Peploe Tru	2	Through the joint promotion of the Green Land with Peploe Trust Land we are able to comprehensively Masterplan and subsequently deliver a substantial part of the New Eastern Villages, which would unlock the southern parcels of the allocation for development at an earlier stage than anticipated. Critically, this will help to facilitate part of the Southern Connector Road.		Noted. The Council welcomes early and proactive engagement to help facilitate and guide development proposals.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
13	Hannick Home and the Peploe Tru	3	<p>The Infrastructure Delivery Plan update for the NEV identifies that provision of a Southern Connector Road, that creates a highway link from the strategic road network (A419) Commonhead roundabout to the New Eastern Villages is critical to ensure capacity on the road network sufficient to accommodate the growth at the NEV. This infrastructure element is considered to have an estimated capital cost of £16.1m - whilst we offer no comment on the accuracy or otherwise of this cost assumption, the IDP states that its provision will be secured through both local “on-site” and shared “off-site” contributions.</p> <p>The alignment of the Southern Connector Route is not fixed. The NEV Inset Diagram, Figure 11 of the Local Plan shows an indicative alignment of a section of this road from Junction 15 of the M40, to the southern edge of the NEV allocation.</p>		Accepted; commitment to co-ordinated development is a positive step and realignment of SCR will not prejudice proper planning of area. No material impact (subject to detailed design/location) relating to environmental issues or traffic impact on Wanborough Road.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
13	Hannick Home and the Peploe Tru	4	<p>An archaeology store would enable storage of the finds and documentary archives associated with the NEV area. It could also act as the main/sole archaeology store for Swindon. This would maximise staff time and other resources, ensuring the sustainability of the NEV facility. It would have the additional benefit of contributing to the historical significance of the developing NEV area. It could be an important community resource, conferring prestige and supporting local learning, community engagement and contributing to local pride and identity.</p> <p>Appropriate archaeology storage would require:</p> <ul style="list-style-type: none"> • Robust, secure premises, with floors capable of bearing weight of collections • Easy access to allow objects to be moved, checked and cleaned • Staff and researcher work space • Staff/researcher amenities (kitchen/staff room, toilets, storage) • Fixed and mobile shelving and racking • Compartmentalised storage for collections with specific environmental requirements • Stable and controllable humidity and temperature • Ventilation to maintain temperature and minimise gaseous pollutants • The means to exclude daylight from all storage areas • Non-water based fire suppression system 		Point noted. Ongoing discussions with Council partners to help showcase the local and historic assets at the NEV.

- Space for collections growth
- Storage for packing, conservation and documentation materials
- Community work/meeting space
- Temporary display facilities, including lockable museum cabinets

We believe this is fair and appropriate and supports 4.4, 4.12,

13 Hannick Home and the Peploe Tru

4

The draft Illustrative Masterplan demonstrates an indicative road network, that accommodates a Southern Connector Road that crosses the Wanborough Road and connects Lotmead and Foxbridge villages. It is clear that at present there is no certainty of provision of such a route in this location. However, the agreement reached between Hannick Homes and Peploe Trust demonstrates a significant opportunity to deliver part of that connector route which will serve to link the villages to the east and west of the Wanborough Road and to help facilitate onward connectivity to Junction 15 of the M4.

Plan ref LHL005-182 demonstrates an alternative location of the southern connector road that could be delivered by Hannick Homes and Peploe Trust.

The location and route choice of the Southern Connector Road will be dictated by ease of delivery, which working with supportive landowners will maximise, but also by geographical constraints presented by archaeology, ecology, flooding and necessary road geometry.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
13	Hannick Home and the Peploe Tru	5	<p>The Local Plan anticipates delivery of Lotmead as part of Phase 2 of the NEV (2019-2024) and Foxbridge as part of Phase 3 the latter part of the Plan period (2021-2026). Therefore, in addition to the provision, in part, of a significant item of NEV infrastructure, delivery of part of a connector route would be instrumental in unlocking part of the allocation which would help bring forward early delivery of homes at both Lotmead and Foxbridge villages and unlock further development parcels within the central portion of the NEV allocation.</p>		Noted.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
13	Hannick Home and the Peploe Tru	6	<p>Paragraph 4.17 of the Council's draft SPD supports an alternative approach to the indicative delivery of the areas of housing within the NEV (the phasing being identified in Figure 11 of the Local Plan), stating that if planning applications are submitted in advance of the indicative phasing plan, developers would need to deliver appropriate level of infrastructure to support a new community, until such time that delivery of other development parcels/ villages comes forward.</p> <p>There is significant opportunity for the Green and Peploe land to accommodate additional development from that indicatively shown in the draft NEV Masterplan, in part to assist in the delivery of part of the Southern connector road and to enable sufficient development to ensure that an appropriate level of infrastructure to support a new community as required by paragraph 4.17 of the Draft SPD.</p> <p>We are currently progressing a Masterplan for the site, to identify development areas and site capacity. The Masterplan will take account of the need to set development within a wider green infrastructure network, and offers suitable mitigation for existing properties adjacent and/or within the site.</p>		Noted.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
13	Hannick Home and the Peploe Tru	7	<p>It is therefore appropriate to reiterate that at this stage our suggested amendment to the draft Masterplan as shown on Plan ref LHL005-182, only seeks to demonstrate an alternative location for that Southern Connector Route, and does not seek, at this stage, to amend the development parcels associated with it. However, it is considered that these areas could accommodate additional development from the relatively limited amount shown in the current Masterplan.</p> <p>Noting the approach set out at para 4.7 of the draft SPD that confirms the role that NEV land promoters have to play in refining the draft NEV Masterplan, we look forward to sharing our emerging Masterplan and design work with the Borough, and request that those outputs are used to help shape successive iterations of the Masterplan.</p>		Accepted; commitment to co-ordinated development is a positive step and realignment of SCR will not prejudice proper planning of area. No material impact (subject to detailed design/location) relating to environmental issues or traffic impact on Wanborough Road.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
14	Capital Land Property Group Ltd an	1	<p>3.2 Land to the east of Swindon was originally identified as an area of search for some 12,000 dwellings. Policy SD2 (The Sustainable Development Strategy) of the adopted Local Plan has a requirement to review the strategy by 2016. As part of this review a new housing requirement will be defined through an updated Strategic Housing Market Assessment (SHMA) due to be published in 2017. All indications are that the SHMA will require an increase in dwellings to cover the period to 2031. It is important therefore that the potential efficient use of land east of Swindon, is not prejudiced at this stage and this should be recognised and recorded in the draft SPD.</p>		<p>It is not the purpose of the SPD to cross refer information in the emerging SHMA. This is part of the Local Plan review process.</p>

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
14	Capital Land Property Group Ltd an	3	<p>It must also be acknowledged that individual applications for parcels of land need to be financially viable and their associated planning obligations have to meet the requirements of Reg 122.</p> <p>For example, the proposed infrastructure requirements for the development at Great Stall East of approximately 1,100 dwellings appear to include an 8FE secondary school and 1,000 space Park and Ride site (it is not clear whether this relates to land for park and ride or safeguarded land). The provision of either of these facilities cannot be justified by the development of 1,100 dwellings and would therefore fail the Reg 122 test. Safeguarding the land for such facilities also impacts on the viability of a development proposal for this part of the NEV. As currently drafted, the draft SPD, Infrastructure Requirements and Infrastructure Delivery Plan appear to require all the CIL Charging schedule contributions as well as the significant expense of the NEV-specific infrastructure requirements and for these to be sought solely through S106 agreements.</p>		<p>The Secondary School and Park & Ride sites are well located spatially to serve the entire NEV. Capital Land will only be required to contribute on a “pro-rata” basis for both the site and build costs, and will be compensated for loss of remunerative development land under equalisation/S106 arrangements.</p>

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
14	Capital Land Property Group Ltd an	4	<p>It would also appear that the evidence base behind the Draft Village Proformas and Infrastructure Requirements is not up to date, particularly in regard to:</p> <ul style="list-style-type: none"> • Secondary, early years and special education provision which is based on 2009 data; • Park and Ride which is based on 2008 data; and • District heating infrastructure which is based on 2011 data. 		<p>The village proformas have been revised to reflect the latest information as relates to the delivery of on-site and off-site infrastructure at the NEV.</p> <p>With specific regard to Park and Ride, SBC are developing a Park and Ride strategy to supersede the previous study undertaken.</p>
14	Capital Land Property Group Ltd an	5	<p>It is also noted that a number of the projects identified in both the Infrastructure Delivery Plan - New Eastern Villages Update March 2016 and Table 1 in the draft SPD are not considered to be necessary. These include Park and Ride, District Centre Community Centre, libraries, New Eastern Villages Community Hub and District Heating Network. Whilst each of these is identified as being of benefit to the development of the NEV, unlike other infrastructure they are not described as being essential to serve the development or critical to its delivery. It is considered therefore that contributions related to these projects do not meet the requirements of Reg 122 and should be removed.</p>		<p>In line with the comprehensive approach required by Policy NC3, the Council will seek from landowners / developers a consortium approach to enter into s106 planning obligations for the purpose of securing equitably and fairly the delivery of infrastructure which is necessary in order for comprehensive and sustainable development including the delivery of library services, community facilities, Park & Ride and District Heating Network.</p>

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
15	DV4 Properties Swindon Co. Ltd (D	1	<p>Firstly, we believe that the title of the Supplementary Planning Document (SPD) is misleading to potential consultees and as such this invalidates the consultation process.</p> <p>The Draft SPD seeks to introduce policies far wider than those simply involved with “Planning Obligations”. The Draft SPD is quite clearly a land use document and seeks to adopt as policy the NEV Masterplan and other documents as well as other land use policies which are not planning obligations.</p>		The SPD seeks to provide further guidance as set out in the Local Plan. The Masterplan has been developed and is consistent with the policy framework as set out in Policy NC3 and Figure 11 of the Local Plan.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
15	DV4 Properties Swindon Co. Ltd (D	2	<p>At paragraph 3.4 it is clear that the Draft SPD, purportedly in respect of planning obligations, is indeed seeking to adopt the Masterplan in terms which specify land uses in specific locations.</p> <p>Were the Planning Obligations SPD to be adopted then clearly conformity to the Illustrative Masterplan, as part of that adopted SPD, would be used for development management decisions.</p> <p>So as to underline the status of the Masterplan, paragraph 4.9 states that when adopted, individual planning applications for development of the NEV will be considered against the background of the Illustrative Masterplan and must be in broad accordance with “the Plan”.</p> <p>Quite clearly the adoption of the Masterplan is being done through a document entitled Planning Obligations. Therefore, potential consultees who may not have any interest in planning obligations may not see the need to respond to such a document thereby denying the opportunity to respond in respect of the land use plan.</p>		<p>As stated in the main SPD document (para 4.4), the Masterplan explains the detail of Figure 11 Local Plan Policy NC3. Development shall be delivered in broad accordance with the Masterplan and may evolve as development proposals are brought forward and detailed site investigations undertaken.</p>

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
15	DV4 Properties Swindon Co. Ltd (D	3	<p>In respect of the SPD generally and the Masterplan it should be noted that the Examination into the Adopted Local Plan spent some considerable time in discussing and preparing Figure 11, based upon the Inspector's concerns regarding the use of SPDs and appropriate levels of detail in the inset diagrams. In this regard the Inspector referred to the 2012 Local Planning Regulations which state that the allocation of sites and policies for their development cannot be devolved from a local plan to SPDs and that policies such as development management policies, site allocations and infrastructure contributions cannot be "hidden" in SPDs.</p> <p>As is set out paragraph 1.2 of the draft SPD it is seeking to go beyond providing supplementary advice on obligations as it is set out to provide further detail in respect of development management and land use policies.</p> <p>The Draft Villages Pro-forma and Infrastructure Requirements which form part of the New Eastern Villages Planning Obligations SPD are clearly land-use documents setting out preferred land uses, including types, locations and densities.</p>		<p>The Masterplan has been altered to more closely reflect Figure 11 of the Local Plan by showing the entire area north of the River Cole as "District Centre" (which includes residential development). The key now includes B8 (Storage and Distribution; any development in this use class must be developed in a "form that complements" the District Centre (Policy NC3). The LPA is commissioning a more detailed District Centre brief to provide further guidance for the successful development of the centre.</p>

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
15	DV4 Properties Swindon Co. Ltd (D	4	<p>All parts of the NEV as shown on the Illustrative Masterplan are covered by the Draft Villages Pro-forma and Infrastructure Requirements document barring the employment site, for which no pro-forma and infrastructure requirement is set out.</p> <p>The consultation exercise is also questionable given that the documents are not presented on the Swindon Borough Council homepage, its Environmental and Planning front page, Planning front page or Planning Policy front page. The document is hidden within a sub-menu for consultations.</p>		<p>Point noted. The SPD and associated proformas will be updated to reflect the current position with regards to planning applications at the NEV.</p> <p>With regards to availability of information on the SBC website, a friendly url link was provided on all covering letters, memos and emails and on the statutory public notice. In accord with the TCPA Regs hard copies were also sent to all Borough libraries and Parish Councils.</p>
15	DV4 Properties Swindon Co. Ltd (D	5	<p>The document relies extensively on the July 2013 Draft Supplementary Planning Document. This document is itself out of date and has been superseded by the Swindon Borough Local Plan 2026. The 2013 SPD is a non-statutory document.</p>		<p>The EV Draft SPD was not formally adopted, however it was subject to public consultation and informed the work on Policy NC3 as detailed in the Local Plan 2026.</p>
15	DV4 Properties Swindon Co. Ltd (D	6	<p>Paragraph 1.11 states that the SPD relates to the infrastructure required for the delivery of a total of approximately 8,000 dwellings as specified in Policy NC3. This statement fails to acknowledge or recognise the requirement for the delivery of other land uses within the NEV, in particular, employment land uses critical to the Borough Council and the local plan's economic development strategy.</p>		<p>As stated in Policy NC3, the NEV is a mixed use development and the village proformas and accompanying IDP (NEV Update) reflect this drawing upon other relevant policies in the Local Plan.</p>

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
15	DV4 Properties Swindon Co. Ltd (D	7	<p>Paragraph 2.19 states that the Council will seek to reach agreement with all parties with a controlling interest in land in the NEV through a Framework S106 Agreement. Such a Framework S106 Agreement can only come forward as part of planning application proposals. In respect of land within the control of our clients at The Hub, planning permission has already been granted, having not entered a Framework S106 Agreement. As such, the Agreement will not capture all development parcels within the NEV and therefore an alternative mechanism is required to ensure a fair and equitable distribution of necessary infrastructure costs.</p> <p>Whilst not being party to any Framework S106 Agreement, our clients would have concern that any proposal sought to guarantee access across land at nil cost.</p>		The Council consider that to ensure a fair and equitable distribution of the necessary planning obligations, a framework Section 106 Agreement will ensure the effective delivery and maintenance of the required infrastructure.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
15	DV4 Properties Swindon Co. Ltd (D	9	<p>Whilst development management requirements can be a means to ensure comprehensive development anti-ransom provisions are not lawful. There is some case law with regards to this position in The Queen v Secretary of State for Environment ex parte Webster in 1999. Mr Justice Sullivan, in Judgement, stated:</p> <p>“the Council took the view that they should ensure that, physically, the access was capable of ensuring the comprehensive development of the whole site and they ensured that by way of conditions. The Council went on to consider the position of the applicant in commercial terms, but took the view that that was a matter to be resolved by negotiations between the interested parties. That was an attitude which the Council were perfectly well entitled to take. The Council, as local planning authority, are not concerned with the private rights of individual landowners and with whether one landowner may or may not have to pay a ransom to another. The Council, as planning authority, are concerned to ensure that the access will facilitate suitable development in physical terms, subject to the landowners entering into negotiations between themselves as to the terms on which they may obtain access over each other’s land.”</p>		<p>As stated in Section 2 of the SPD, the Council will use s106 planning obligations in line with the legal framework including to secure funding for the delivery of infrastructure; to safeguard land for infrastructure delivery; to safeguard access to land for infrastructure delivery; to control the direct delivery of infrastructure where it is appropriate to do so and no more suitable alternative mechanism exists; and to control the future use of land and access to it once that infrastructure has been delivered, as appropriate.</p>

Later in the Judgment, Mr Justice Sullivan emphasised that such matters are for commercial negotiations between landowners and if the land owners genuinely are unable to come to terms, the Council would always have a back-stop position of being able to make a CPO to secure the development of the land.

Furthermore, Regulation 122 of the CIL Regulations requires councils to only take a S106 Agreement into account if it meets the three statutory tests. It is not believed that an anti-ransom provisions could meet those tests.

Whilst landowners may willingly enter into such an agreement, such an agreement could not be taken into account in decision making, and the rejection of entering such an agreement would not provide the council with reasonable ground for resisting planning permission.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
15	DV4 Properties Swindon Co. Ltd (D	10	<p>In respect of the NEV Masterplan, paragraph 4.3 states that this has been “comprehensively updated” in partnership with a wide range of stakeholders.</p> <p>This is not accepted as will be highlighted in respect of these representations. The final bullet point on paragraph 4.7, again in respect of the NEV Masterplan, states that this has been prepared in co-operation with work undertaken by land promoters and other groups.</p>		There will be another opportunity to comment upon changes made to SPD and accompanying documents. The Council continues to work proactively with its partners, interested parties and delivery agents.
15	DV4 Properties Swindon Co. Ltd (D	10	<p>In respect of the NEV Masterplan, paragraph 4.3 states that this has been “comprehensively updated” in partnership with a wide range of stakeholders. This is not accepted as will be highlighted in respect of these representations. The final bullet point on paragraph 4.7, again in respect of the NEV Masterplan, states that this has been prepared in co-operation with work undertaken by land promoters and other groups.</p>		The preparation of the SPD has been an iterative process and the Council will continually engage with the developers, stakeholders and all interested parties in the achievement of comprehensive and sustainable development at the NEV.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
15	DV4 Properties Swindon Co. Ltd (D	11	In addition to the requirement to enter a Framework S106 Agreement, the SPD at 4.11 paragraph states that developments within the NEV will be supported where the necessary planning obligations are secured to enable development to take place by securing unfettered access across third party land. As a generality, clearly such Section 106 agreements need to take into account CIL Regulations in respect of the tests to be met and in respect of pooling.		Noted.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
15	DV4 Properties Swindon Co. Ltd (D	12	<p>Overall the Illustrative Masterplan needs to conform far more closely to the adopted Figure 11 Inset Diagram in identifying land uses. In its present form the Masterplan, being part of the SPD, is seeking to allocate sites and policies, not in accordance with the Local Plan.</p> <p>The Adopted Local Plan quite clearly identifies what is now being referred to as Great Stall West as well as the employment site falling between Great Stall West and Great Stall East, as a single land use allocated for “Mixed Uses; District Centre; Employment and Residential”. Indicative locations for mixed employment and district centre are indicated. The Adopted Inset Diagram also shows two main access points as well as an indicative core express bus network route and indicative express bus network route. The indicative core express bus network route crosses through the employment site in an east to west direction, connecting the park and ride site in Great Stall East (adjacent to the A420) with the district centre located in the approximate position of the existing Sainsbury’s store and then on to the Green Bridge. The indicative express bus network route continues from the main access point at Gable Cross travelling directly north to the local centre, located centrally within Upper Lotmead.</p> <p>The Illustrative Masterplan seeks to</p>		<p>The Masterplan has been revised to closely reflect Figure 11 of the Local Plan by showing the entire area north of the River Cole as “District Centre” (which includes residential development). The key now includes B8 (Storage and Distribution; any development in this use class must be developed in a “form that complements” the District Centre (Policy NC3). The LPA is commissioning a more detailed District Centre brief to provide further guidance for the successful development of the centre.</p>

allocate this part of the NEV in a way which will not deliver the development needs set out in the Adopted Local Plan.

15 DV4 Properties Swindon Co. Ltd (D

13

The development area shown for employment uses on the Masterplan total just over 20 hectares representing only two thirds of the gross area required for B8 uses within the Adopted Local Plan and Economic Development Strategy.

The Illustrative Masterplan shows broadly the development parcels proposed as part of the outline planning permission (S/OUT/14/0253) for B1b/c, B2 and B8 uses. It was always made clear to the local authority that the employment provision as part of the application would not meet the full policy requirement for 30 hectares of B8 employment and that further land within the Local Plan mixed-use allocation would be required to be brought forward for employment uses to meet the Local Plan and economic strategy requirement. Furthermore, the intended allocation within the SPD Illustrative Masterplan for B2 and B8 uses does not cover the full range of uses permitted by way of the outline consent.

Noted.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
15	DV4 Properties Swindon Co. Ltd (D	14	The Illustrative Masterplan does not distinguish a road hierarchy unlike the Adopted Inset Diagram.		The adopted inset diagram (Figure 11 of the Local Plan) illustrates the following on site highway features: Main Access Points, Green Bridge, Indicative Southern Connector Road, Indicative Express Bus Network Route and Indicative Core Express Bus Network. These highway features are illustrated on the current Masterplan, with the width of the indicative road representing its status as Primary or Secondary route. This hierarchy will be further detailed as the Masterplan progresses.
15	DV4 Properties Swindon Co. Ltd (D	15	The Illustrative Masterplan identifies large areas of green infrastructure within the employment area, particularly within the northern site area. At present there is an area of land protected by a Condition due to the presence of archaeological finds. In the event that further archaeological investigation determines that development may occur in this area, it should not be constrained by the land use allocation in the Illustrative Masterplan.		Noted, but the LPA considers that the identified archaeological area will need to be protected from development in perpetuity.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
15	DV4 Properties Swindon Co. Ltd (D	16	<p>In addition, land west of the indicative road opposite Marston Farmhouse and the area shown for district centre, referred to as Area C in respect of The Hub application, is included for green infrastructure.</p> <p>This area of land was subject to early discussions with the local planning authority regarding commercial uses as part of the employment application but was subsequently deleted from that application. However, the intention remains to bring this site forward in accordance with policies within the Adopted Local Plan and the allocation within the Adopted Local Plan as being part of the mixed-use District Centre, Employment and Residential area. The approved layout for the employment development includes an access into Area C. The district centre annotation needs to be extended west to include Area C.</p>		Noted and plan amended.
15	DV4 Properties Swindon Co. Ltd (D	17	<p>It is noted that in respect of the east/west spine road, other than for the employment uses, there is no set-back from the road network of indicative development areas and no incidental open space included. The Illustrative Masterplan needs to include all of that land up to the road network as employment use or the Masterplan should include 20 meter landscape corridor either side of the indicative road network.</p>		The incidental open space adjacent to the employment area at Symmetry Park is reflective of the submitted and approved planning application. The development areas to the east are not subject to this level of detail and scrutiny and any incidental open space or road set back will be determined through the planning process and the demands of the road user groups.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
15	DV4 Properties Swindon Co. Ltd (D	18	<p>Area C is included within the Great Stall West Draft Villages Pro-forma and Infrastructure Requirements section. This sets the land use requirement for approximately 900 dwellings, at an average density of 40 dwellings per hectare, on an area exclusively for residential use of approximately 7 hectares which includes the primary road network. However, residential is included within the district centre mixed-uses (A1-A5, C1-C3, D1-D2) as well as B1a/b/c uses. Such employment land is said to be required to compliment the mixed-use district centre.</p>		Noted.
15	DV4 Properties Swindon Co. Ltd (D	19	<p>The section in respect of Great Stall West in terms of local infrastructure needs, design and form of development, also refers to the villages of Great Stall West and Great Stall East being the most visible part of the development from the A420 (it is noted that there is a typographical error in the document).</p> <p>The villages of Great Stall East and Great Stall West are seen as gateways to Swindon and that it is essential that high quality design and use of high quality materials is achieved. These comments together with the absence of a pro-forma which covers the employment area would confirm that the employment land is not considered to be part of the villages.</p>		Noted. The village proformas will be reviewed to reflect the employment uses at these locations. It is not considered necessary to prepare separate village proformas for employment land as the development of the NEV needs to be considered as a whole.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
15	DV4 Properties Swindon Co. Ltd (D	20	In respect of strategic infrastructure needs a reference was made to contributions towards “the bridges”. No explanation of what “the bridges” means, as to whether this is the Great Stall Bridge, or bridges across the River Cole.		The Village Proformas include Great Stall Bridge and linkages between development islands as individual infrastructure requirements. The 'linkages between development islands' have been previously referred to as 'bridges' and will incorporate road, footway and cycle route links that may need to traverse waterways and floodplain etc.
15	DV4 Properties Swindon Co. Ltd (D	21	In respect of shared strategic infrastructure needs which includes A420 highway improvements including Gable Cross Roundabout improvements, no reference is made to shared infrastructure needs for any other access off the A420.		Strategic infrastructure along the A420 east of the A419 is listed as White Hart Junction, Gablecross Roundabout and Police Station Access. These are implicated by all NEV traffic utilising the A420 corridor. Site specific access onto the A420 will however be specifically necessary to release development parcels and these access points will be the sole responsibility of the associated development parcel.
16	Hannick, Hallam and Taylor Wimp	1	HHT consider that a Framework Agreement approach is unrealistic due to the considerable number of landowners and developers who have interests in land and/or development schemes that comprise the NEV allocation. As such we consider it necessary to introduce sufficient flexibility to allow an alternative approach, should it prove unfeasible to introduce a Framework S106 Agreement.		The Council consider that in the interests of delivering that to ensure a fair and equitable distribution of the necessary planning obligations, a framework Section 106 Agreement will ensure the effective delivery and maintenance of the required infrastructure.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
16	Hannick, Hallam and Taylor Wimp	2	A flexible approach is required by national guidance in respect of the preparation of local policy guidance including supplementary planning documents. Such documents and indeed planning obligations should avoid adding inappropriately to the burdens on development.		The SPD and its accompanying documents have been prepared in accord with Planning and CIL legislation.
16	Hannick, Hallam and Taylor Wimp	3	HHT set out suggested amendments to the draft SPD which we consider are necessary to ensure sufficient flexibility within the document to support the timely implementation of the NEV, having regard to the Local Plan policy framework. Such amendments would ensure consistency with national planning policy and guidance.		Noted.
16	Hannick, Hallam and Taylor Wimp	4	<p>To provide sufficient flexibility to allow an alternative approach HHT considers it necessary to introduce additional text to the final sentence at para 2.13.</p> <p>Landowners/developers are encouraged to join together and enter into framework agreement with the Council, [added text follows] although the Council will consider alternative mechanisms if necessary. Such a change is entirely consistent with SD3 and its commitment to find solutions that mean that permissions may be granted and given the lack of evidence that the Framework Agreement approach is realistic.</p>		The Council consider that to ensure a fair and equitable distribution of the necessary planning obligations, a framework Section 106 Agreement will ensure the effective delivery and maintenance of the required infrastructure.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
16	Hannick, Hallam and Taylor Wimp	5	<p>Policy HA2: Affordable Housing</p> <p>The wording in the first bullet point in para 2.15 does not accurately reflect Policy HA2. It reads as though the delivery of off site provision may be subject to viability assessment whereas the actual policy makes it clear that the 30% target is subject to viability. So it might be worth considering amending the wording to read:</p> <p>Policy HA2: Affordable Housing. This policy requires all developments of 15 homes or more or on sites larger than 0.5 hectares, and subject to economic viability, to deliver a target of 30% affordable homes on site, or where it can be demonstrated as appropriate, a proportionate contribution can be provided towards affordable homes off site provision.</p>		Policy HA2 is an adopted Local Plan policy.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
16	Hannick, Hallam and Taylor Wimp	6	<p>Framework S106 Agreement HHT suggest the following amendment to the text at Para 2.19 to provide sufficient flexibility to allow an alternative approach to a Framework S106 Agreement.</p> <p>The Council will seek to reach agreement with all parties that have a controlling interest in the land at the NEV through a Framework Section 106 Agreement. The Framework Section 106 Agreement suggested replacement text "will serve" with " would aim" to:</p> <p>Capture all development parcels within the NEV to ensure a fair and equitable distribution of the necessary planning obligations and the effective delivery and maintenance of the required infrastructure.</p> <p>Ensure that the triggers for infrastructure delivery are reasonable so as to not jeopardise the viability of development proposals within the NEV.</p> <p>Provide an effective mechanism for securing the land required for infrastructure within the NEV development area - this will provide certainty that land will be safeguarded for a specific purpose and guarantee access across land at nil cost to facilitate the delivery of infrastructure that spans two or more different landownerships.</p>		<p>The Council consider that to ensure a fair and equitable distribution of the necessary planning obligations, a framework Section 106 Agreement will ensure the effective delivery and maintenance of the required infrastructure.</p>

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
			[Delete following text] "This agreement is critical in assisting developers in ensuring that their schemes form part of a wider comprehensive strategic development."		
16	Hannick, Hallam and Taylor Wimp	7	<p>7. Insert additional paragraph Para 2.20:</p> <p>It is recognised that a Framework S106 Agreement may not be achievable given the number of parties within controlling interests in the NEV, and therefore alternative proposals may need to be progressed in order to deliver the proposed development and infrastructure in a timely manner. Such an alternative scenario may involve the delivery of infrastructure being secured by a series of S106 planning agreements entered into as and when specific villages within the NEV progress.</p> <p>The proposed amendments recognises that the approach set out by the Borough Council is not the only means by which necessary infrastructure may be delivered.</p>		The Council consider that to ensure a fair and equitable distribution of the necessary planning obligations, a framework Section 106 Agreement will ensure the effective delivery and maintenance of the required infrastructure.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
16	Hannick, Hallam and Taylor Wimp	8	<p>Infrastructure Delivery Plan</p> <p>HHT understands the Infrastructure Delivery Plan to be a living document and considers that it is right to be viewed in this way and as such the information within it insofar as assessment of infrastructure requirements will develop and be refined over time as a result of more detailed assessment.</p> <p>HHT supports an approach that seeks to secure a future consultation on cost variance from that stated in the IDP. However, HHT are not in agreement that a 10% uplift in cost variance can be assumed to be tolerable. It is critical that infrastructure costs are fully understood and made readily available to interested parties to ensure viability of schemes is fully considered. This applies to cost changes of below 10% and para 2.22 should be amended accordingly.</p>		Point noted. With regards to subsequent reviews of the IDP, the Council consider that it is appropriate to review this on an annual basis and will be subject to public consultation. The SPD will be reviewed on this basis.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
16	Hannick, Hallam and Taylor Wimp	9	<p>It is critical that the schemes identified in the IDP are necessary and are appropriately evidenced in terms of function, need and cost, so as to ensure that any such contributions are proportionate, reasonable and directly related to the development. HHT agree that it is inevitable that costs and requirements will evolve as new information becomes available.</p> <p>For this reason and for those set out in Appendix A to these representations, reference should be made to the need for review of the elements and costs of infrastructure insofar as they are described in the SPD.</p>		The SPD states that the IDP will be reviewed to take account of future changes to costs and requirements.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
16	Hannick, Hallam and Taylor Wimp	10	<p>Moreover, it should be clear that the costs of infrastructure provision or requirements may need to be reviewed specifically in the context of the approval of specific applications.</p> <p>Suggest the following addition to para 2.22:</p> <p>The extract of the IDP that relates specifically to the delivery of the NEV has been updated for public consultation alongside this SPD. It is likely that certain costs will evolve as new information becomes available [suggested additional text] including in particular in the context of specific planning applications where the need for, cost and delivery will need to be further considered.</p>		Point noted. The Council consider that it is appropriate to review the IDP on an annual basis and will be subject to public consultation.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
16	Hannick, Hallam and Taylor Wimp	11	<p>Securing Planning Obligations at the New Eastern Villages</p> <p>For the reasons set out above and in Appendix A to these representations, HHT suggest the following amendments to the text at Para 3.3 and 3.5 to provide sufficient flexibility to allow an alternative approach to a Framework S106 Agreement.</p> <p>Para 3.3 - The Council [suggested deletion of "requires" [amendment to text suggested "seeks" a holistic approach to the securing and provision of necessary shared infrastructure for the NEV development, and to ensure infrastructure is delivered in the right place at the right time. [Additional text suggested] This may be achieved by a Framework S106 Agreement for the NEV or an alternative arrangement as referred to above in paragraph 2.20.</p> <p>Sufficient flexibility should also be introduced into para 3.5 given the substantial uncertainty regarding agreeing an equalisation procedure.</p> <p>It should be recognised explicitly that equalisation is not likely to be achievable given the number of parties with controlling interests in the NEV.</p> <p>While in paragraph 3.5 the SPD provides</p>		The SPD has been updated to improve clarity.

for the Council to work with landowners and developers to fix and agree locations and sizes of relevant facilities in the absence of an agreed equalisation process it goes further by suggesting the need for an agreement of a "precise equalisation procedure."

[Additional text suggested as follows]
The need for such a procedure remains unrealistic but also unnecessary. The SPD should be amended to provide further flexibility. This should include deletion of the reference in the last sentence of para 3.5: "and agree the precise equalisation procedure at developer cost."

16 Hannick, Hallam and Taylor Wimp

12

Planning Obligations
Para 4.11 Amend as follows:

"In line with Local Plan policy, development proposals within the NEV will be supported by the necessary planning obligations. These will be secured as appropriate having regard to the nature of the S106 mechanisms being used in order to:

Noted.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
16	Hannick, Hallam and Taylor Wimp	13	<p>On and Off Site infrastructure Para 4.13 Amend as follows:</p> <p>“Onsite infrastructure will include both strategic and ‘local’ items i.e. specific infrastructure items identified for each village. A list of the infrastructure requirements, also referred to as a ‘pro forma’ has been prepared for each village. This suite of documents will help to identify the infrastructure items required at each village in a clear and succinct way. [New text follows] The precise way in which such infrastructure is to be provided or contributed towards will depend on the nature of the S106 mechanisms used.</p> <p>Moreover the following should be added as a new paragraph</p> <p>“The schedule of strategic and local infrastructure needs sets out the potential requirements arise from the policies of the development plan. The requirements each village both in term of local and strategic infrastructure) will be refined in the light of updated policy for instance at national level in relation to sustainable development, and having regard to the means by which infrastructure is to be provided. Account will also be taken of the costs of provision and changes thereto and also the need for a demonstrable relationship</p>		The village proformas clearly set out the on and off site infrastructure requirements.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
			between the provision sought and the development to be permitted. The Council recognises that further prioritisation of the requirements may be necessary and appropriate and that not all such provision (e.g. provision for off site infrastructure) will meet the tests of planning obligations in each circumstance or that all such provision may be deliverable or affordable”.		
16	Hannick, Hallam and Taylor Wimp	14	<p>Para 4.15 – see Appendix A to these representations. Phasing Plan</p> <p>Para 4.17 Amend as follows: If planning applications are submitted in advance of the Phasing Plan, the onus will be on the developer working with the Council to deliver the appropriate level of infrastructure to support the new community until such time as the delivery of other development parcels / villages come forward.</p>		Noted.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
16	Hannick, Hallam and Taylor Wimp	15	<p>Summary of infrastructure requirements Para 4.18 Amend as follows: Table 1 below sets out some of the key strategic and local infrastructure requirements. It indicates whether items are a shared infrastructure need or development site-specific infrastructure requirement. The shared infrastructure includes the infrastructure that is critical to the sustainable delivery of the NEV as a whole that requires the safeguarding of land and / or funding from more than one application site. For the avoidance of doubt, the way in which shared infrastructure is delivered, and indeed what is shared infrastructure, will depend on the nature of the S106 mechanism used. For example, a Framework S106 Agreement entered into by all parties with a controlling interest in the NEV will allow infrastructure to be shared by all of the parties where appropriate. However, if an alternative solution is progressed then some of the shared items may be delivered by particular villages and some of the items may be delivered by a group, but not all of the villages.</p> <p>New Para: It is likely that as new</p>		The village proformas clearly set out the requirements for each village.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
			information becomes available including in particular in the context of specific planning applications, where the need for cost and delivery, will need to be further considered. See reference in appendix A to viability and the example of District Heating.		
16	Hannick, Hallam and Taylor Wimp	16	<p>Masterplan</p> <p>The wording at Para 4.8 - 4.10 of the draft SPD would seem to suggest that the Masterplan will remain in draft form through the adoption of this SPD, and as such the Plan will therefore be subject to a separate consultation process and adoption date. HHT consider that clarity should be provided on this point. In making comments on the Plan, HHT have assumed that the Illustrative Masterplan is intended to form part of the SPD.</p>		The SPD comprises of the Masterplan, NEV IDP and village proformas.
16	Hannick, Hallam and Taylor Wimp	17	<p>Where both paragraphs 3.4 and 4.9 refer to the need for proposals to be in broad accordance with the Illustrative Masterplan, there is also welcome recognition that the master plan may evolve as proposals come forward and further investigations are completed. Significant departures from the Masterplan may therefore be justified which should of course be recognised in para 3.4 and/or 4.9 of the draft SPD.</p>		Noted. SBC will require development proposals to be “in broad accordance” with the adopted Masterplan.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
16	Hannick, Hallam and Taylor Wimp	18	<p>Draft Proformas</p> <p>Similarly the wording at Para 4.13 of the Draft SPD suggests that the Proformas are separate to, and do not form part of the Draft SPD. This is further confirmed by the lack of reference within the contents page of the draft SPD. HHT therefore consider that this should be made explicit at Para 4.13 that the proformas do not form part of the SPD but are informative to help guide the delivery of the infrastructure associated with each village.</p> <p>Add additional paragraph: "For the avoidance of doubt the infrastructure referred to as the Village proforma do not form part of the SPD but are informative to help guide the delivery of infrastructure. The requirements set out in the proforma will in any event be considered in the light of updated information and evidence including that in relation to viability and/or deliverability and in the context of individual applications"</p>		Noted. It will be made clear that the village proformas seek to inform the SPD.
16	Hannick, Hallam and Taylor Wimp	19	HHT welcome the acceptance that the master plan may evolve as proposals come forward and further investigations are completed.		Noted.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
16	Hannick, Hallam and Taylor Wimp	20	<p>Para 4.7 of the draft SPD sets out 6 key considerations that have been taken into account in developing the draft NEV Masterplan one of which is to “adopt a pragmatic approach to preparation, including acknowledging and incorporating, where appropriate, work undertaken by NEV land promoters and community groups”.</p> <p>In this vein we consider that the NEV Masterplan and draft proformas should be amended as illustrated in the attached amended Master Plan (Appendix C) to reflect the significant technical surveys and masterplanning exercises associated with application proposals for South Marston and Rowborough which reflect the extensive discussions with Swindon Borough Council and other parties regarding both site wide design principles and more detailed masterplanning points. Such evolutions reflect amendments made in the updated application proposals which in turn reflect updated technical work set out in the Regulation 22 submission.</p> <p>In considering amendments to the Illustrative Masterplan therefore, reference should be made to the material set out in the updated application submission (including Regulation 22</p>		Noted.

Rep no Organisation

Comment No Justification

Proposed changes

Officer response

information) which should inform the progression of the SPD.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
16	Hannick, Hallam and Taylor Wimp	21	<p>Education</p> <p>With regard to education provision, strategic policies NC3 and RA3 state that development should deliver primary school places within the village to meet the needs of the expansion, and does not address the means by which this is delivered.</p> <p>While HHT are conscious of the discussions in relation to the expansion of the existing primary school, the strategic policy (NC3) is to deliver school places not necessarily through the expansion of the school. Were the expansion of the existing school not to take place, then an alternative means of provision would be required. This may include provision of a 1FE school at South Marston within the area covered by the illustrative Masterplan.</p> <p>In the eventuality that the expansion of the existing South Marston Primary School does not proceed as planned, then a sufficient and well located site (along with replacement residential land) should be identified within the Masterplan proposals to ensure that primary school provision is provided.</p> <p>The attached amended plan sets out the most appropriate location for a school site within the expansion areas of South Marston and this should be reflected on</p>		<p>Noted.</p> <p>If the Education Authority does not proceed with the expansion of the existing school, there will be a requirement for the provision of a new 1FE school. The alternative school site location proposed by HHT is acknowledged.</p>

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
			the illustrative Master Plan.		
16	Hannick, Hallam and Taylor Wimp	22	<p>Development Parcels</p> <p>Were a site to be developed for a new school within the expanded South Marston then replacement residential land would need to be brought forward for development. An equivalent area of residential development is therefore included within the attached amended illustrative master plan in extended development parcels to the south of those shown on the above Plan prepared by the Borough Council - to come forward (and recognised as such) in the eventuality that the extension of the existing primary school does not take place and that a new one is required.</p>		If the Education Authority does not proceed with the expansion of the existing school, there will be a requirement for the provision of a new 1FE school. The alternative school site location proposed by HHT is acknowledged.
16	Hannick, Hallam and Taylor Wimp	22	<p>Other minor refinements to the development parcels are proposed as a result of the further progression of the master planning process and in the light of updated environmental information that accompanies the application update.</p>		Noted.
16	Hannick, Hallam and Taylor Wimp	23	<p>For the reasons set out in the updated application material a modest variation is proposed to the alignment of the primary street shown within the expanded South Marston village. The amended alignment is located to the south of Red House and would result in an effective, deliverable and appropriate element of the Masterplan.</p>		Masterplan being updated.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
16	Hannick, Hallam and Taylor Wimp	24	<p>With regard to Rowborough, HHT continue to regard the provision of a second point of access between Old Vicarage Lane and Rowborough to be an important part of the Masterplan and anticipated for some time – including in the Swindon Transport model.</p> <p>The benefits of the second access as part of the movement network have been set out in the application proposals to date and in the updated proposals and Regulation 22 information.</p> <p>Provision of two access points will have substantial benefits in terms of the access and movement strategy including allowing the delivery of a true public transport loop (which employs the shortest route and avoids duplicated sections of road on the route) and hence will result in much enhanced public transport provision.</p> <p>Equally, provision of enhanced foot and cycle connections along less trafficked road or roads will also contribute strongly to encouraging sustainable modes including for those making use of complementary services and facilities in South Marston and Rowborough. Additionally the management of the construction process and emergency access provision are important benefits.</p>		<p>Linkages between the A420 at the proposed eastern access under the railway and Old Vicarage Lane would allow for a strategic bus loop addressing connectivity between the development, Swindon and Oxford, including interim towns and villages, and would also enable improved public transport linkages with the NEV south of the A420 including secondary school, district centre and park and ride. A secondary route to Old Vicarage Lane would therefore require significant justification to offset the environmental implications of constructing an otherwise unnecessary road.</p>

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
			The Transport Assessment work associated with the application proposals demonstrates that two access points would be both entirely acceptable in terms of wider impacts and indeed desirable as part of the access and movement strategy.		
16	Hannick, Hallam and Taylor Wimp	25	In this vein we consider that the NEV Masterplan and draft proformas should be amended as illustrated in Appendix B to reflect the significant technical surveys and masterplanning exercises associated with application proposals for South Marston and Rowborough which reflect the extensive discussions with Swindon Borough Council and other parties regarding both site wide design principles and more detailed masterplanning points.		Noted.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
16	Hannick, Hallam and Taylor Wimp	26	<p>In all proformas the following references should be made to reflect the need for the infrastructure requirements to be fully justified and as necessary updated and prioritised:</p> <p>The schedule of strategic and local infrastructure needs sets out the potential requirements arise from the policies of the development plan. The requirements each village both in term of local and strategic infrastructure) will be refined in the light of updated policy for instance at national level in relation to sustainable development, and having regard to the means by which infrastructure is to be provided. Account will also be taken of the costs of provision and changes thereto and also the need for a demonstrable relationship between the provision sought and the development to be permitted. The Council recognises that further prioritisation of the requirements may be necessary and appropriate and that not all such provision (e.g. provision for off site infrastructure) will meet the tests of planning obligations in each circumstance or that all such provision may be deliverable or affordable.</p>		<p>The SPD main document together with the village proformas and infrastructure requirements sets out clearly the items required to ensure the delivery of a comprehensive, sustainable development at the NEV.</p>

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
16	Hannick, Hallam and Taylor Wimp	27	<p>With regard to education provision, strategic policies NC3 and RA3 state that development should deliver primary school places within the village to meet the needs of the expansion, and does not address the means by which this is delivered.</p> <p>While HHT are conscious of the discussions in relation to the expansion of the existing primary school, the strategic policy (NC3) is to deliver school places not necessarily through the expansion of the school. Were the expansion of the school not to take place, then an alternative means of provision would be required. This may include provision of a 1FE school at South Marston within the expansion area.</p> <p>Indeed, in the eventuality that the expansion of the existing South Marston Primary School does not proceed as planned a site should be provided within the South Marston expanded village to accommodate a single form entry school, land which would otherwise form part of the residential uses on the site.</p> <p>Were this land to be developed as a primary school then replacement residential land of an equivalent amount would be brought forward for development. The proforma should therefore be amended to provide</p>	Wording amended to accommodate an alternative approach to expansion of the existing school.	Noted.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
			sufficient flexibility to accommodate this alternative scenario, locating an accessible school site and replacement residential parcels.		
16	Hannick, Hallam and Taylor Wimp	28	<p>In additional flexibility should be provided to accommodate a scenario where the local centre/ community hub at South Marston could be delivered on Parish Council Land, or on HHT land.</p> <p>Discussions are ongoing in relation to the aspirations of the parish to create a new village centre and the extent to which these aspirations are generated by the expansion of the village subject of the development proposed by HHT. As such, the nature and scale of the contributions to be generated from the development, and the location for these community facilities is not as yet finalised.</p>		Noted.
16	Hannick, Hallam and Taylor Wimp	29	<p>HHT are willing to consider the transfer of the new playing fields to the Parish Council and/or Council as appropriate, as part of the section 106 to accompany a planning consent.</p> <p>However clarity should be given in relation to the compensatory land at “Bell Gardens”, that it should be of equivalent amount to that provided to deliver the expansion of the primary school, if indeed education provision is to be secured through that option.</p>		Noted, the appropriate level of detail is provided in the village proformas.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
16	Hannick, Hallam and Taylor Wimp	30	The 3rd bullet point relating to design codes should be amended to reflect the wording of Policy SD3 that allows for an overarching design approach to be identified through design codes and / or framework plans or appropriate alternative mechanism.		Policy SD3 is already referenced and in the context of the village proformas it is appropriate to reference the preparation of design codes.
16	Hannick, Hallam and Taylor Wimp	31	BREEAM standards – particular excellent standards have been superseded by national policy and are not consistent with the NPPF.		For non residential development Excellent BREEAM standards are still applicable.
16	Hannick, Hallam and Taylor Wimp	32	<p>The 3rd bullet point refers to the transfer of land to secure road(s) across the Public Right of Way (Bridleway 5) and appropriate funding (S.237). HHT wish to make clear that the transport and pedestrian/cycle connections to be provided as part of the proposals at South Marston provide excellent connectivity within the expanded village, and as such, the connected movement network as required through Local Plan Policy RA3 is not reliant on the provision of this connection across the track.</p> <p>Notwithstanding this, the application proposals demonstrate a willingness by the applicants to facilitate such a connection by providing a road link to a point close to the track on either side, albeit not across the track. Such a connection across the track would need to be made by Swindon Borough Council, and/or third party- if required.</p>		Noted.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
16	Hannick, Hallam and Taylor Wimp	33	The 4th bullet point refers to provision of walking and cycle network improvements as required by policy NC3. However, Policy NC3 does not stipulate provisions of new connections across the railway, although these may well be provided in due course, therefore HHT considers that reference to walking and cycle connections across the A420/railway are removed to ensure consistency with strategic policy.		<p>To ensure wider connectivity to the NEV, it is important that linkages are secured which offer both walking and cycling provision. The railway and the A420 are significant existing barriers to this connectivity, thus opportunities to provide connections to the south should be maximised to increase accessibility for all.</p> <p>This is considered compliant with NC3 which requires 'walking and cycling network improvements that integrate with existing networks and provide good connectivity within the development and to the surrounding area' (i.e. to sites either side of the railway) and to provide 'new accesses to the A420 for proposed residential uses', which may not be considered feasible without first crossing the railway.</p>
16	Hannick, Hallam and Taylor Wimp	34	Community Facilities Policy RA3, appropriately, does not provide detail on the nature or scale of community Facilities at South Marston, only that they should be of an appropriate scale to that development.	HHT consider that the text should be amended to more accurately reflect the process of finalising the range of community facilities, and the flexibility afforded by RA3.	It is not the role of the village proforma to set out extensively in detail the specific requirements of community facilities. Thus, offers sufficient flexibility to deliver appropriate facilities for the local community.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
16	Hannick, Hallam and Taylor Wimp	35	<p>Green Infrastructure Leisure and Heritage</p> <p>The 4th bullet point should be amended to reflect the wording of Local Plan Policy EN4 allows flexibility in provision of net local biodiversity gain, through an alternative provision of appropriate mitigation and/or compensation measures.</p> <p>The mechanism for maintenance of the facilities is proposed to be the estate rent charge and should be reflected.</p>		Point 4 accurately reflects the provisions of Policy EN4 in the Local Plan.
16	Hannick, Hallam and Taylor Wimp	36	<p>Waste Management and Utility Services</p> <p>The 2nd bullet point refers to utility service connections to existing properties. Whilst it is agreed that existing properties will benefit from upgrades to local utilities infrastructure provided to support the village expansion. It is not appropriate for new development to directly and retrospectively upgrade utilities provision for all existing properties.</p>		Consistent with Policy RA3.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
16	Hannick, Hallam and Taylor Wimp	37	<p>Other Considerations</p> <p>HHT remain concerned regarding the viability implications for the provision of items required as part of the sustainability agenda, such as District Heating, any such references should be qualified with “where demonstrated appropriate and subject to viability”. In reality there is little evidence to support their inclusion – or that of some off site measures – certainly as a matter of course.</p> <p>Public art is no longer supported in national guidance.</p>		Point noted. Policy DE1 sets out a requirement for the provision of public art.
16	Hannick, Hallam and Taylor Wimp	38	<p>Main Land Uses</p> <p>The 4th bullet refers specifically to the provision of a “Sports Hub”. Policy NC3 does not refer to provision of a sports hub within Rowborough, and as such, this item should be removed.</p> <p>Sports and community provision will be provided within Rowborough, to include formal sports pitches and associated community buildings/pavilion, however this detail will be determined at the detailed design of the local centre/ mixed use areas. Reference to these mix of uses is suggested to be incorporated into the 3rd bullet.</p>		Playing pitch provision is a policy requirement of residential development. This is clearly stated in Policy NC3 and emerging work on the Council's playing pitch strategy supports the delivery of sports hubs.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
16	Hannick, Hallam and Taylor Wimp	39	Land Required The 3rd bullet refers to provision of a sports “hub” facility, this should be removed and reference made to sports provision as part of the local centre/ mixed use areas, in accordance with the strategic policy NC3.		The provision of sports hubs required at the NEV is in accord with Policy NC3 and EN3 of the Local Plan.
16	Hannick, Hallam and Taylor Wimp	40	Design and Form of Development The 3rd bullet point relating to design codes should be amended to reflect the wording of Policy SD3 that allows for an overarching design approach to be identified through design codes and / or framework plans or appropriate alternative mechanism.		The wording is consistent with that detailed in Policy SD3.
16	Hannick, Hallam and Taylor Wimp	41	The 6th bullet point relating to housing parcel adjacent to Nightingale Wood needing to be “set back” from the woodland edge should be deleted. It should not be the intention of this document to determine detailed design responses to edge treatments. This requirement does not relate to a local infrastructure need, and only serves to prejudice the proper detailed masterplanning of the eastern part of Rowborough.		The wording is consistent with Policy EN1.
16	Hannick, Hallam and Taylor Wimp	42	BREEAM standards – particular excellent standards have been superseded by national policy and are not consistent with the NPPF.		There is still a requirement for non residential development to deliver Excellent BREEAM standards

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
16	Hannick, Hallam and Taylor Wimp	43	Suggest deletion of the wording “secured community access”. The design for the school has not been progressed, and such wording could serve to frustrate any such future design process and/or management arrangements to co-locate and or jointly manage community facilities within the school.		Agree
16	Hannick, Hallam and Taylor Wimp	44	HHT consider that the text should be amended to more accurately reflect the process of finalising the range of community facilities, and the flexibility afforded by NC3.		Noted.
16	Hannick, Hallam and Taylor Wimp	45	<p>Green Infrastructure Leisure and Heritage</p> <p>The 4th bullet point should be amended to reflect the wording of Local Plan Policy EN4 allows flexibility in provision of net local biodiversity gain, through an alternative provision of appropriate mitigation and/or compensation measures.</p> <p>The mechanism for maintenance of the facilities is proposed to be the estate rent charge and should be reflected.</p>		The wording already detailed in the proforma accurately reflects Policy EN4.
16	Hannick, Hallam and Taylor Wimp	46	<p>Other Considerations</p> <p>HHT remain concerned regarding the viability implications for the provision of items required as part of the sustainability agenda, such as District Heating, any such references should be qualified with “where demonstrated appropriate and subject to viability”.</p>		The SPD has been revised to clarify viability. Please refer to Section 7.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
17	Highways England	1	Highways England welcome the introduction of a NEV Planning Obligations SPD as this would provide a robust policy position on which to progress S106 agreements for the development parcels within NEV, and bring forward the strategic infrastructure required to accommodate the development in a timely manner.		Noted.
17	Highways England	2	As outlined in Swindon Eastern Villages Transport Study-Update Report 2012, identifies that development will need to minimise its traffic impact on the SRN and that it would be expected that NEV would make a proportional contribution to the agreed improvement scheme at M4 junction 15 required to support planned growth, based on the level of additional traffic the development would generate.		J15 of the M4 is currently subject to improvement works secured against development at Commonhead and further contribution may not be considered necessary.
17	Highways England	3	We note that the strategic network improvements agreed at M4 junction 15 and identified in the IDP are not contained either within the summary table or the proformas.		The Proforma's have been updated to consider this.
17	Highways England	4	The NEV Mitigation Works West of A419 and Apportionment of Impacts March 2014 aggregates traffic impact at M4 junction 15 for the morning and evening network peak hour period and demonstrates that cumulatively, the NEV development results in an 8% increase in traffic at the junction.		The modelling which informed the apportionment report is currently being re-done to determine NEV impact upon J15. The modelling will also illustrate the impact of other Swindon allocated development at highway improvements being delivered by the NEV such as White Hart, to determine the over-arching picture.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
17	Highways England	5	Where a Local Plan identifies that a strategic infrastructure improvement is required to accommodate the cumulative impact of planned growth and/or the transport evidence base submitted in support of a planning application indicates that the impact of a development is likely to have a severe impact on the safety or operation of the SRN in Swindon, Highways England will require that the development does not proceed until the works necessary to offset the unacceptable impacts of the development are in place in accordance with DfT Circular 02/2013 "The Strategic Road Network and the Delivery of Sustainable Development".		Noted.
17	Highways England	6	As outlined in the NEV highways and transport evidence base prepared to support the Local Plan and subsequent Supplementary Planning Documents, the improvement scheme identified for M4 junction 15 is required to accommodate the impact of planned growth at NEV and Commonhead and should be brought forward in a timely fashion with the delivery of these development sites.		Agreed if found feasible.
17	Highways England	9	Highways England supports the indicated phasing approach to the delivery of housing and infrastructure.		Point noted.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
17	Highways England	10	Highways England recognises that the priority of infrastructure requirements may change over time to reflect the phasing of the development, funding status and scheme delivery progress. We would anticipate further engagement with Swindon Borough Council in this respect as the development evolves in order to ensure that strategic highway and transport infrastructure is appropriately prioritised, funded and delivered.		This is welcomed.
17	Highways England	11	Having reviewed the New Eastern Villages Planning Obligations Draft Supplementary Planning Document March 2016 we are satisfied that, with respect to the SRN, the policies and proposals have been produced in accordance with the adopted Core Strategy and NPPF. However, given the importance of SRN infrastructure to the delivery of the development, particularly M4 junction 15 and the A419T we strongly recommend that provision is made within the SPD in regards to securing the funding and delivery of the M4 junction 15 improvement scheme should this be required.		J15 improvements are included in the Infrastructure Delivery Plan for the NEV and are therefore intrinsically linked with the NEV despite being delivered by other development parcels. If the delivery of the J15 works are jeopardised, then the delivery will be re-assessed against other funding streams.
18	Network Rail	1	From a long term planning perspective, the line between Didcot and Swindon may be subject to four tracking at some point in the future, therefore we would not want any new link (either across or under the railway) to preclude this.	Footpath 5 plans should consider the possibility of four-tracking on the main railway line.	Noted.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
18	Network Rail	2	<p>Developer Contributions</p> <p>The New Eastern Villages Planning Obligations Draft Supplementary Planning document should set a strategic context requiring developer contributions towards rail infrastructure where growth areas or significant housing allocations are identified close to existing rail infrastructure.</p> <p>Many stations and routes are already operating close to capacity and a significant increase in patronage may create the need for upgrades to the existing infrastructure including improved signalling, passing loops, car parking, improved access arrangements or platform extensions.</p> <p>As Network Rail is a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development. It is therefore appropriate to require developer contributions to fund such improvements.</p> <p>Specifically, we request that a Policy is included within the document which requires developers to fund any qualitative improvements required in relation to existing facilities and infrastructure as a direct result of increased patronage resulting from new development.</p>	<p>To ensure that developer contributions can deliver appropriate improvements to the rail network we would recommend that Developer Contributions should include provisions for rail and should include the following:</p> <p>A requirement for development contributions to deliver improvements to the rail network where appropriate.</p> <p>☐</p> <p>A requirement for Transport Assessments to take cognisance of impacts to existing rail infrastructure to allow any necessary developer contributions towards rail to be calculated.</p> <p>A commitment to consult Network Rail where</p>	<p>In appropriate circumstance contributions will be sought from development to contribute towards the delivery of bridges and related infrastructure required to secure appropriate and safe access across the mainline railway.</p>

The likely impact and level of improvements required will be specific to each station and each development meaning standard charges and formulae may not be appropriate. Therefore in order to fully assess the potential impacts, and the level of developer contribution required, it is essential that where a Transport Assessment is submitted in support of a planning application that this quantifies in detail the likely impact on the rail network.

Level Crossings

Councils are urged to take the view that level crossings can be impacted in a variety of ways by planning proposals:

- By a proposal being directly next to a level crossing
- By the cumulative effect of development added over time
- By the type of crossing involved
- By the construction of large developments (commercial and residential) where road access to and from site includes a level crossing
- By developments that might impede pedestrians ability to hear approaching trains
- By proposals that may interfere with pedestrian and vehicle users' ability to see level crossing warning signs
- By any developments for schools, colleges or nurseries where minors in numbers may be using a level crossing.

development may impact on the rail network and may require rail infrastructure improvements. In order to be reasonable these improvements would be restricted to a local level and would be necessary to make the development acceptable. We would not seek contributions towards major enhancement projects which are already programmed as part of Network Rail's remit.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
20	Sainsbury's Supermarket Ltd	1	<p>District Centre</p> <p>Sainsbury's Supermarkets Ltd supports the designation of a district centre as set out in the draft illustrative Masterplan. The proposed district centre on the draft Masterplan rightly incorporates the existing Sainsbury's store at Oxford Road, so that the store can provide the anchor for the new district centre. This approach accords with the principle establishment in the adopted Local Plan under Policy NC3: New Eastern Villages and as clearly shown in Figure 11- New Eastern Villages inset diagram within the adopted plan. The inclusion of the Sainsbury's store within the district centre will allow Sainsbury's to better serve the existing communities along with the future communities that will be a part of the NEV as envisaged by the NEV policy. Furthermore, the proposed infrastructure, as illustrated on the draft Masterplan, should allow strong vehicular connectivity, public transport and pedestrian permeability to ensure the district centre is well connected with the new, future residential communities. The integration of the district centre to the other parts of the NEV will be an important part of the success of the NEV project.</p> <p>In conclusion, our client supports the draft illustrative Masterplan, so far as it relates to the provision of the new district centre incorporating the existing Sainsbury's store.</p>		Noted.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
20	Sainsbury's Supermarket Ltd	2	<p>Framework S106 Agreement</p> <p>The draft planning obligations includes reference to a Framework Section 106 agreement, one of the aims of which is to ensure a fair and equitable distribution of planning obligations, which includes contributions towards transport infrastructure. In this regard, the mechanism for apportioning contributions will need reflect the different nature and relative impacts of trips which are attracted to a retail centre and those which are newly generated by residential development. The Sainsbury's store and district centre have important roles to play in containing newly generated trips within the NEV and the contribution methodology should not see these uses as trip generators.</p>		<p>Planning applications associated with Sainsbury's and the District Centre will need to illustrate the proportions of pass by, diverted and NEV internalised trips to establish the impact upon the external network. This work would then be used to determine an appropriate S106 package commensurate with the impact of the development.</p>
20	Sainsbury's Supermarket Ltd	3	<p>A420 Improvements</p> <p>The emerging transport infrastructure proposals associated with the New Eastern Villages include preliminary proposals for the A420 improvements which show the conversion of the Gablecross Roundabout into a 4 arm signal junction and the signalisation of Sainsbury's egress onto A420. While Sainsbury's have no objection to these proposals in principle, it would need to be robustly demonstrated that these highway works would not be detrimental to the operation of the existing store or the future district centre.</p>		<p>The aim of all of the junction interventions is to maximise capacity, without negatively implicating existing user groups. The operation of Gablecross in its revised form will be established through further commissioned modelling and appropriate sense checks which Sainsbury's and other stakeholders will be engaged with.</p>

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response																																																												
21	Forestry Commission	1	<p>I am writing on behalf of the Forestry Commission to put forward a list of works that we think will be required in Nightingale Wood as a result of the Eastern Villages Development. Please see the attached spreadsheet [detail copied below].</p> <p>NIGHTINGALE WOOD - DRAFT COSTINGS FOR IMPROVEMENTS TO HANDLE THE IMPACT OF THE EASTERN VILLAGES DEVELOPMENT</p> <table><tr><td>One-off Capital Payment</td><td>Maintenance Payments</td><td>Annual Maintenance Payment (x 10)</td><td>Total</td></tr><tr><td colspan="4">Car Park and paths</td></tr><tr><td colspan="4">Upgrade of forest road & car park to a bitmacced finished surface & associated drainage works</td></tr><tr><td>£345,000</td><td>£345,000</td><td></td><td></td></tr><tr><td colspan="4">Upgrade of forest trails using a stone surface not bitmac & associated drainage works</td></tr><tr><td>£165,000</td><td>£165,000</td><td></td><td></td></tr><tr><td colspan="4">Maintenance of forest road & car park after 5 years = £35,000, 10 years = £52,000</td></tr><tr><td>£87,000</td><td>£87,000</td><td></td><td></td></tr><tr><td colspan="4">Maintenance of trails after 5 years = £17,000, 10 years = £25,000</td></tr><tr><td>£42,000</td><td>£42,000</td><td></td><td></td></tr><tr><td colspan="4">Meadow</td></tr><tr><td colspan="4">A yearly cut and collect in the meadow to promote wildflower habitats = £1000 per annum</td></tr><tr><td>£10,000</td><td>£10,000</td><td></td><td></td></tr><tr><td colspan="4">Litter</td></tr><tr><td colspan="4">£25 per visit for litter collection and bin emptying = £50/week = £2600 per</td></tr></table>	One-off Capital Payment	Maintenance Payments	Annual Maintenance Payment (x 10)	Total	Car Park and paths				Upgrade of forest road & car park to a bitmacced finished surface & associated drainage works				£345,000	£345,000			Upgrade of forest trails using a stone surface not bitmac & associated drainage works				£165,000	£165,000			Maintenance of forest road & car park after 5 years = £35,000, 10 years = £52,000				£87,000	£87,000			Maintenance of trails after 5 years = £17,000, 10 years = £25,000				£42,000	£42,000			Meadow				A yearly cut and collect in the meadow to promote wildflower habitats = £1000 per annum				£10,000	£10,000			Litter				£25 per visit for litter collection and bin emptying = £50/week = £2600 per					Policy NC3 sets out the requirements for Green Infrastructure at the NEV. The need for, and, opportunity to provide new access arrangements to Nightingale Wood are acknowledged and will be taken into account at the more detailed planning stage(s).
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 £1400£1,400£1,400
 £
 Dog waste bins£
 4 x replacement bins = £200/bin +
 £150/b install = £1400£1,400£1,400
 Dog waste bag dispenser =
 £130£130£130
 £
 Interpretation/map/furniture£
 3 x Trail map and clip frames for car park
 + Lecturn style interpretation board for
 around trim trail -
 £2,800£2,800£2,800
 Delivery-approximately
 £350 £350£350
 Installation -£225 £225£225
 4 picnic tables to replace existing ones on
 site, including installation-
 £1,600£1,600£1,600
 £
 Buildings£
 £25,000 for small toilet block + £15,000
 for water pipes + £4,000 for septic
 tank£44,000£44,000
 £4,000 for installation of paid parking
 machine£4,000£4,000
 TOTAL£565,905£129,000£36,000£73
 0,905

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
22	The Ramblers	1	The failure of the Masterplan to distinguish between footpaths, bridleways and cycle tracks is inadequate as a means of planning the future rights of way network. A map should be produced which shows not only the proposed status of each route but also distinguishes between: existing paths retaining current status/alignment; existing paths proposed for upgrade/diversion/extinguishment; proposed new paths.		Noted. It is agreed that individual requirements and function of all routes need to be detailed; such requirements and specifications will be secured at the more detailed planning stage(s).
22	The Ramblers	2	We are pleased to see within the Infrastructure Delivery Plan a requirement for Network Rail to fund an overbridge to carry the existing FP 5 South Marston over the railway, upgraded to be fully accessible to all users, at a cost of £1.5m. We understand from Martin Fry, Rights of Way Manager, that Network Rail are currently proposing a much cheaper bridge with steps. That would not be acceptable.		Agreed.
22	The Ramblers	3	No safe route across the A420 is shown for residents of Rowborough. This is unacceptable. The existing south-eastern section of South Marston FP1, which passes under the railway, is not shown on the Masterplan.		Additional crossing points of the A420 have been identified on the Masterplan. Detailed specification of crossings will be carefully considered at the more detailed planning stage(s).

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
22	The Ramblers	4	The southern end of the bridleway leading to Roves Lane, which currently ends at the A420 west of Acorn Bridge, is shown as crossing the A420 but no information is provided as to how this crossing will be made safe. It is not shown on the A420 Improvements map which was displayed at the public exhibition at Wanborough before Easter.		Improvements to this crossing point will need to be considered in context with the relatively adjacent access for Rowborough to the A420. This will be considered at a detailed planning stage.
22	The Ramblers	5	While recognising that the land involved is outside the red line, the possibility of a short link from this path across the River Cole to join the existing footpath south of Acorn Bridge should be explored.		This will be explored as the Masterplan and application detail evolves.
22	The Ramblers	6	The land south of the A420 currently suffers from a dearth of RoWs, and those that do exist run predominantly north-south. We therefore welcome the proposed new routes, including east-west links, shown on the Masterplan. We think an additional east-west link to connect Lotmead and Redlands villages would be beneficial.	We think an additional east-west link to connect Lotmead and Redlands villages would be beneficial.	Additional strategic footpath-cycleway routes have been added to the Masterplan. Further non-strategic routes will be provided across the NEV as part of the normal detailed planning of individual areas.
22	The Ramblers	7	There is a need to ensure that those planning applications already submitted (Lotmead/Redlands) include provision for the new paths shown in the		These paths will be considered through any reserved matters applications associated with these development parcels.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
22	The Ramblers	8	Many of the proposed paths south of the A420 rely on the canal towpath for connection. Since the Infrastructure Development Plan does not require developers to contribute towards the cost of the canal there is a clear risk that the development will be completed without the canal having been built. What is the fall back position if this occurs?		The footpaths may be delivered along the safeguarded route without the waterway being implemented.
22	The Ramblers	9	We note that the status of the "Green Bridge", now renamed as "Great Stall Bridge", appears to be changing from that set out in the adopted Local Plan, where it was clearly described as being (solely) for "walking, cycling and public transport". It is now described as a "bus priority" bridge, and the plan displayed at the Wanborough exhibition shows it as having a conventional road carriageway connecting to the existing Merlin Way roundabout. This suggests that it will be open to other vehicular traffic. We oppose this change; the original "green bridge" plan should be retained.		The Local Plan states that "the development shall provide: a green bridge across the A419 near Covingham Drive to provide for walking, cycling and public transport." The policy does not explicitly exclude general traffic provision, however SBC are further assessing the bridge and traffic demand to confirm that exclusive use of the Bridge by walkers, cyclists and bus users does not have significant repercussions elsewhere on the transport network.
22	The Ramblers	10	It is not clear what the safe walking route will be from NEV to and across the re-designed White Hart junction.		This is a matter for later detailed technical specification, however current indicative proposals suggest the implementation of at-grade toucan crossings and the potential retention of the existing footbridge.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
22	The Ramblers	11	The indicative footpath/cycle track crossings of the A419 shown on the Masterplan are puzzling. Their position does not accurately reflect the existing RoWs, which are effectively impossible to use. Is it intended to introduce safe crossings? There would be a clear benefit in enabling employees to reach the Dorcan Industrial Estate, but why are two crossing points shown here? A better option for the southern crossing would be to link to the footpath around Liden Lagoon, which in turn provides a traffic-free route through Liden to the hospital.	A better option for the southern crossing would be to link to the footpath around Liden Lagoon, which in turn provides a traffic-free route through Liden to the hospital.	Noted and acknowledged. The routes which exist as public rights of way have been deleted from the Masterplan.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
23	Natural England	1	<p>A landscape appraisal would be a very helpful design tool for preparing this SPD. For example, Fareham Borough Council undertook a landscape appraisal for their major strategic site at Welborne, which in our view was very helpful in determining the landscaping and design requirements of the allocation. We consequently urge the council to undertake one as soon as practicable, and ensure that the SPD is flexible enough to be modified in the light of this assessment. In particular, such an assessment will help ensure that any proposals that come forward are acceptable in terms of landscape impacts on the North Wessex Downs AONB. This point was made in our September 2013 response to the Eastern Villages and South Marston draft Supplementary Planning Documents.</p> <p>Related to this, the adopted Local Plan says (of the Eastern Villages):</p> <p>c. the development will ensure:</p> <ul style="list-style-type: none"> • The landscape context and views to and from the North Wessex Downs AONB are respected, including potential off-site mitigation; <p>The SPD does not seem to have considered whether such mitigation is required, or include a contingency for such mitigation in the infrastructure provisions. A landscape appraisal would help resolve whether such offsite mitigation is required, and where it might be delivered.</p> <p>A landscape appraisal may also assist in</p>		<p>Noted and accepted. The Masterplan is underpinned by landscape appraisal work which will be published as part of the evidence base. Off- site Community Forest planting will be part of mitigation works funded by s106 monies.</p>

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
			determining the applications as they come forward. When Natural England was consulted on the Lotmead application in June 2015 we were unable to advise on the landscape aspects of the development as due to severe limitations of the landscape appraisal submitted with the application.		
23	Natural England	2	We also advise that the design should be informed by an assessment of biodiversity assets and opportunities for enhancement.		Noted and accepted. The Masterplan is informed by ecological and bio-diversity survey and assessment.
23	Natural England	3	We note that the canal alignment is somewhat changed from the adopted local plan, which may reduce the public access to it. We also note that there does not appear to be any allowance in the infrastructure schedule for funding for creating the canal. When and as it is built, it may be appropriate to have public rights of way running both sides of the canal, not just one as per the Masterplan.		The alignment of the canal meets the requirements for a safeguarded and technically feasible route.
23	Natural England	4	Our public rights of way GIS layer differs from that on the published Masterplan. It would be helpful to know the current network as well as the proposed network.		Any required PROW diversions will be subject to statutory diversion order procedures.
23	Natural England	5	It would be helpful if the SPD identified what the specific types of green infrastructure were on the Masterplan (or on a separate plan).		This work has been undertaken and the GI typologies will be carefully planned in consultation with Natural England and the Wiltshire Wildlife Trust.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
23	Natural England	6	It would help to identify where, for example “bridleway 5” is.		The Masterplan would become too cluttered to label all the proposed infrastructure / locations of infrastructure, although this matter, including correct labelling, will be considered with each relevant planning application.
23	Natural England	7	It would help if the maps showing the draft village proformas (and/or Masterplan map) showed the extent of each village.		Each village proforma provides a 'snapshot' of each village taken from the Masterplan.
23	Natural England	8	We welcome the significant funding allocated for nature reserve(s) and other GI asset classes, though are unable to advise whether it is adequate to meet the requirements of the plan, as it is unclear what is being proposed.		Point noted. Ongoing discussions will continue to understand requirements in due course.
23	Natural England	9	We note that the village proformas mention “Contributions towards Great Western Community Forest (off site planting schemes)”, though the sum for the Great Western Community Forest in the IDP is specified as being located onsite. It would be helpful to reconcile this matter.		The delivery of the GWCF will be delivered on and off site.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
23	Natural England	10	<p>We note that the adopted Local Plan says:</p> <p>Policy EN1: Green Infrastructure Network: a. In accordance with the Swindon Borough Green Infrastructure Strategy, development shall protect and enhance green infrastructure and assets as identified in Appendix 4 (which includes Rights of way).</p> <p>We appreciate that there are a number of measures to enhance public rights of way. None-the-less, with such a level of development, we advise that careful scrutiny is applied to ensure that the SPD is consistent with local plan policy, and that there is no net detriment to the public right of way network (or more generally the recreational resource), both quality and extent.</p>		Point noted. The SPD has been prepared in accord with all relevant policies in the Local Plan.
23	Natural England	11	<p>We advise that a number of site wide strategies would produce more coherent and better outcomes for the site as a whole. As well as a site wide landscape appraisal and associated strategy (as advised above), a site wide biodiversity strategy (see for example the Wichelstowe biodiversity strategy), and green infrastructure strategy would be of value. The latter could cover the planned functions of various elements of green infrastructure and its future management. For example, if areas are to be grazed, there will be very different infrastructure requirements compared to if they are to be mown.</p>		Noted. Work has started on a NEV wide green infrastructure strategy.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
24	Sport England	1	<p>The New Eastern Villages Draft Village Proformas and Infrastructure Requirements (March 2016) document identifies local infrastructure needs required at each village and how they will be funded, whether it's through S.106 agreements or via CIL. It is understood the infrastructure requirements are based on the policies of the adopted Local Plan and the supporting evidence base documents including the Infrastructure Delivery Plan - NEV Update March 2016. The exact sports provision at the New Eastern Villages should be underpinned by a robust need and evidence base – something Sport England do not feel the Council have at this current time.</p>		<p>Noted. The NEV, as a strategic site, is currently £0 rated for the purposes of CIL.</p>

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
24	Sport England	2	<p>Paragraph 73 of the NPPF requires local authorities to undertake a robust and up to date assessment of need for outdoor and indoor sports provision and to use the assessment to identify specific need, deficiencies/surpluses in both quantity and quality within their area and therefore understand what provision is required. Sport England is aware the Council is currently preparing a Playing Pitch Strategy which sets out priorities and actions in relation to pitches across Swindon. The emerging study identifies the need for grass playing pitches at the New Eastern Villages. However the Council does not appear to have an evidence base for built sports facilities (sport strategy). Sport England encourages the Council to undertake an assessment of the needs and opportunities for built sports facilities in line with Sport England's guidance https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/assessing-needs-and-opportunities-guidance/. This guide is complimentary with the PPS guidance providing the recommended approach for assessing the need for pitch provision. Sport England believes that providing the right facilities in the right place is central to enabling people to play sport and maintain and grow participation. An assessment of need will provide a clear understanding of what is required in an area, providing a sound basis on which to develop policy,</p>		Noted. The SPD and IDP sets out the requirement for leisure provision.

and make informed decisions for sports development and investment in facilities. It is essential that the evidence of sporting needs and priorities is fed into the IDP, SPD and the CIL Regulation 123 list. The Council's Playing Pitch Strategy will help the Council determine what sports infrastructure is required for playing fields and Sport England intends to work with the Council to ensure that the outputs from this work and the Council's other strategies for outdoor and indoor facilities can be fed into the Council's supporting evidence base documents.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
24	Sport England	3	<p>The Council's CIL Regulation 123 list sets out what CIL will be spent on. With regards Sports provision it advises CIL will fund the following:</p> <ul style="list-style-type: none"> - Enhancement and management of existing leisure centres/ sports complexes/ sports halls; - Upgrade and management of existing strategic outdoor sports and recreation provision and creation of new provision and associated facilities (excluding the implementation and establishment of specific on-site requirements in Swindon's New Communities) <p>Whilst it is good that the Council are seeking CIL to fund sports provision, Sport England would recommend that the CIL Regulation 123 list should state specifically what is needed and this should be underpinned by a robust need and evidence base.</p> <p>Sport England would recommend the Council first assess the needs for sports (outdoor and indoor) and then only seek CIL to fund 'big ticket' items, which are high priority strategic facilities or improvements to existing strategic facilities. This will increase the likelihood of delivery. Other small scale sport provision (e.g. new pitches) may be better funded by S106 contributions. At present, the wording is considered very generic and as there is not a robust assessment of the need for outdoor</p>		Noted. Infrastructure required for the NEV is set out in the IDP and village proformas.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
			sports pitches or indoor leisure facilities and centres, there is uncertainty over the sustainable delivery of sports provision.		
25	Historic England	1	Recognising Swindon's welcome policy commitment to safeguarding and positively responding to effected heritage assets including the site of the former Roman town, are you able to clarify how this SPD provides for/contributes to such conservation, appreciation and enjoyment? If planning obligations are not the appropriate means is the local authority able to confirm how such matters will be funded/addressed?		Noted, detailed mitigation measures will be considered at the detailed planning application stage and determined in accordance with the adopted Swindon Borough Local Plan.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
26	Swindon CCG	1	<p>We understand that the Council is currently working from an estimated population increase of 20,000 people, from the anticipated 8,000 dwellings. This represents an average occupancy rate of 2.5 people per dwelling. Based upon the NHS England safe working ratios that equates to 1,800 patients per whole time equivalent (WTE) GP, the proposed population increase as a direct result of the development will require an additional 11 WTE GP's, as well as additional Primary Care Services including dentistry, community services to support the delivery of GPs and a pharmacy provision.</p> <p>The Primary Care service requirement as a result of this growth has been calculated using NHS England Guidance. Based on a 20,000 population increase, approximately 3,430m2 of additional</p>		Noted. The IDP will be updated to reflect this.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
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26	Swindon CCG	2	<p>For a development of 8,000 dwellings with a population of circa 20,000 requiring access to Primary Care, that equates to an 11 WTE GP Practice plus associated services needed to support the care delivered to those patients. NHS England and the Department of Health use a guide of circa 1,800 patients per WTE GP to determine the likely population requiring Primary Care Services.</p> <p>In addition the NHS will need to increase access to other services provision including Children’s Services, Mental Health Services, Community Services, and Acute Services including patient bed capacity. It will also impact on emergency services such as ambulance and A&E services.</p>		Noted.
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26	Swindon CCG	3	<p>Additional information about the proposed phasing of housing in the NEV is vital to allow for sufficient time for the procurement of a new Primary and Health Care Service and appointment, it will help to identify the point at which a new facility (or enhanced provision) would need to be delivered and operational.</p> <p>Information on phasing of this development is crucial to enable Primary Care, Community and Mental Health Services in Swindon and Shrivenham to establish the temporary provisions needed to support the growth until the permanent provision is available.</p>		Noted.
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Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
26	Swindon CCG	4	The approach taken by the Council to prepare a framework Section 106 Agreement, and secure developer contributions from all areas of the NEV towards the provision of additional health infrastructure is supported.		Noted.
26	Swindon CCG	5	Further exploration is required of the identified options for future service delivery to determine the most appropriate strategy for delivering additional health services in this area.		Noted. The Council will continue to work proactively with healthcare providers to secure appropriate provision at the district centre and at other locations if necessary.
27	Environment Agency	1	We are pleased to see the Policy EN6 is embedded in the document.		Noted.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
28	Haydon Wick Parish Council	1	<p>From reading the documents there does not appear to be any plan to significantly improve the A420. Anyone who uses the road, particularly at peak times will be aware of the long, slow procession of cars and lorries on this stretch of road. In particular, during the evening rush hour traffic can be queuing back from Gablecross (Sainsbury's roundabout) to beyond Old Vicarage Lane, South Marston. The main eastern access into Swindon will be along Oxford Road, Stratton St Margaret which is already very busy at peak times. This will cause knock-on effects at the existing Greenbridge roundabout.</p> <p>When the Shrivenham and Faringdon by-passes were built the opportunity to provide dual carriageways was missed. There are a few stretches of dual carriageway on the Oxfordshire stretch of the road particularly at the Abingdon/Witney junction (A420/A415 at Southmoor) and at the A420/A338 junction. These comprise only a few metres in each case.</p>		<p>A number of improvements are proposed on the A420 corridor as part of a comprehensive transport strategy for the NEV. These are listed in each proforma within the Strategic Infrastructure Needs - Transport and Movement. The improvements will be centred around White Hart, Gablecross, Police Station Access, Nythe Road Junction and Greenbridge Roundabout and will aim to maximise capacity and accessibility and improve the movement of highway users of the A420.</p>
28	Haydon Wick Parish Council	2	<p>Although not covered in these documents, if as seems likely, the plans progress to developing the area between Kingsdown and Stanton Fitzwarren the developers will want access from the B4019 Blunsdon to Highworth Road. This will put extra pressure on this road which is already a main route from the Lechlade/Highworth area to the A419/M4.</p>		<p>Development in this area will be considered through the planning process and will be subject to negotiations to determine an appropriate transport package to mitigate its impact. This is not a NEV development parcel.</p>

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
28	Haydon Wick Parish Council	3	In addition, and as in the north Swindon area, residents of the eastern developments will look towards Swindon to provide their everyday needs for employment, leisure, shopping, etc. putting additional pressure on local services.		Noted
29	Wanborough Parish Council	1	Section 4.4 – Clarification of ownership and maintenance of flood risk zones is needed.		An emerging SUDs strategy for the NEV will be available for public consultation soon. It will seek to identify best practice in the delivery and maintenance of SUDs at the NEV.
29	Wanborough Parish Council	2	Section 4.5 – Parish Council support the down classification of Wanborough Road		Noted.
29	Wanborough Parish Council	3	Section 4.6 – There has been no formal consultation on the Southern Connector Road proposals, proposed route through the NEV and how the road will cross Wanborough Road.		The development of the Southern Connector Road is still at a very high strategic level, with the detail yet to be developed. In this regard, full consultation on the scheme has not been progressed, but all relevant stakeholders will be consulted in due course as the scheme progresses and Options Appraisals are developed.
29	Wanborough Parish Council	4	Section 4.14 – Phased release of play facilities and open spaces – should also be front loaded, especially for developments who are trying to bring forward their proposals out of phase.		The onus will be on developers to provide on and off site open space in accord with the development proposals requirements. Delivery will be subject to detailed Reserved Matters applications.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
29	Wanborough Parish Council	5	Section 4.16 & 4.17 – These two sections are very vague. To bring a site out of phase will have a huge impact on the surrounding area, leaving the “onus” on the developer to deliver appropriate infrastructure, is not specific enough. There needs to be more strict guidelines for bringing development areas out of phase. These sections do not make it clear how “out of phase” a development proposal is allowed to be, resulting in isolated developments.		As stated at paragraphs 5.17 and 5.18 of the SPD, the indicative delivery areas detailed in the Local Plan helps to identify the Council’s preferred approach to the phasing of the housing and the related infrastructure to support the new communities at the NEV. If planning applications are submitted in advance of the preferred phasing, the onus will be on the relevant developer(s) and/or interested parties to deliver the appropriate level of infrastructure to support the new community until such time the delivery of other development parcels / villages come forward.
29	Wanborough Parish Council	6	Appendix 2, page 19 d. – Great Moorleaze – How will the Southern Connector Road enhance this historic building?		Noted, detailed mitigation measures will be considered at the detailed planning application stage and determined in accordance with the adopted Swindon Borough Local Plan.
29	Wanborough Parish Council	7	Appendix 2, page 19 e – Non specific on how character of villages will be protected. This needs to be clearly defined. Urbanisation by putting street lights on Wanborough Road, or pavements for example is not protecting the character of the village.		Landscape setting including on-site and potential off-site tree planting (Community Forest) and other environmental mitigation will be carefully considered at individual planning application(s) stages.
29	Wanborough Parish Council	8	Appendix 2, page 19 e - Need to clearly define “small scale development” within area of non coalescence.		No NEV housing development is proposed within the Indicative Non-Coalescence Area.
29	Wanborough Parish Council	9	South Marston clearly references South Marston’s Neighbourhood Plan, however there is no reference made to Wanborough’s Neighbourhood Plan.		The Wanborough Neighbourhood Plan is emerging and currently has little weight in planning terms. However, as the Plan proceeds appropriate reference can be made in due course.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
29	Wanborough Parish Council	10	Density shown for this area should be 30-35 dwellings per hectare and not 40 as shown.		Policy NC3 sets the average density for the NEV. It is acknowledged that housing densities/design approach towards the “edges” of the NEV need to be carefully considered and appropriate for the area, including at Redlands.
29	Wanborough Parish Council	11	There should be no access onto Wanborough Road, Redlands village should be accessed via NEV only. Opening up access to the Wanborough Road will allow traffic from the whole of the NEV to access onto Wanborough Road, there is nothing within the Masterplan to show how this will be prevented.		It is planned to connect to Redlands with the NEV by an internal road. Traffic management measures and a circuitous alignment within the Redlands development will discourage traffic moving through Redlands accessing Wanborough Road.
29	Wanborough Parish Council	12	Due to the close proximity of Wanborough Road, which is the old Roman Road, plus there are well known scheduled monuments around the area, it is important that a thorough archaeological assessment is carried out on the site prior to any development, and this needs to be stated within the		Full archaeological evaluation will be required and undertaken before construction works are permitted at Redlands. Appropriate conditions will be attached to any grant of outline planning permission(s).
29	Wanborough Parish Council	13	Relationship and access to the Southern Connector Road must be defined in the interest of good planning and transport planning		The access from Redlands will be aligned to make northern egress the pre-dominant route and traffic signage will clearly direct traffic to the SCR.
29	Wanborough Parish Council	14	There needs to be more specific numbers allocated to this area in order that the appropriate transport surveys etc. can be carried out.		The current application is clearly defined as up to 370 homes to allow traffic impact assessment to be undertaken; any possible additional development at Redlands will also be carefully assessed for traffic impact.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
29	Wanborough Parish Council	15	There needs to be more specific details as to where the contributions for leisure, play areas and open spaces. Clearly if there is no provision made within the area then contributions need to be considered for facilities in Wanborough (the closest facilities to the site).		The quantum of open space can be calculated and open space should be provided onsite as an integral part of the development.
29	Wanborough Parish Council	16	There needs to be more specific detail on healthcare provision.		Agreed.
29	Wanborough Parish Council	17	There is nothing mentioned within the SPD about the supply of water and waste provision. Thames Water have clearly stated that phasing of the NEV is critical to delivering a service in line with the anticipated provision.		The village proformas have been updated to reference to ensure there is infrastructure in place to manage water supply and waste water.
29	Wanborough Parish Council	18	All the plans within the SPD are not clear and can easily be misinterpreted.		The Masterplan is necessarily schematic at a scale of 1:5000; all applications must be in “broad accordance” with it and any grant(s) of planning permission will require more detailed design proposals relating to the application area. Planning conditions. Design Codes and a legal agreement will further define any consent.
29	Wanborough Parish Council	19	It is not clear as to how the Southern Connector Road will cross Wanborough Road, at the moment this is shown as a circle. SBC have confirmed that this does not mean there will be a roundabout, however there is nothing to show within the plan to confirm how this will work.		All junctions are shown by a generic symbol; the actual SCR junction will be subject to detailed design/ planning application.
29	Wanborough Parish Council	20	There is no foot or cycleway shown on the Southern Connector Road.		The Masterplan only indicatively shows key footpath-cycleway routes through green infrastructure. The SCR will be designed with footways and cycleways (subject to detailed design) along its alignment.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
29	Wanborough Parish Council	21	At the centre of the NEV, the density of houses should be higher than on the outskirts at the moment this is shown the same (40 dwellings per hectare).		Noted and accepted in broad terms. Design Coding of the development will consider this design aspect in detail.
30	SBC (Conservation)	1	I note that section 4.6-4.10 highlights the development of the Masterplan. I am not clear on how this relates to the NEVPO SPD and if adoption of the NEVPO SPD also includes adoption of the Masterplan?		The SPD comprises the Masterplan, IDP and village proformas.
30	SBC (Conservation)	2	<p>Consultation of draft Supplementary Planning Documents (SPD's) in 2013. In summary I advised;</p> <p>there is much work to doing respect of the historic environment and therefore the lack of research at this stage does impede the opportunity for the historic environment to help steer, inform and integrate the development.</p> <p>The acknowledgement of setting of assets (via policy) is accepted however as noted above, further scope as to the affect upon setting is again hampered by the location, extent and significance of assets not being fully understood at this stage. (part extract).</p>		Noted. The LPA will carefully assess each individual/reserved matters planning application to ensure that the protection/mitigation of important heritage assets are dealt with in accordance with Policy EN10 of the SBLP. Such matters of detail can be properly and satisfactorily addressed through conditions requiring the approval of reserved matters.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
30	SBC (Conservation)	3	<p>In summary I am not clear on the adoption of the master plan, its development and timescales. I am happy to go through my comments and help inform, however the lack of evidence to support does impede my assessment with regard to the acceptability and opportunity and how that may relate to the delivery of infrastructure.</p> <p>** I would suggest that the relevant policies should be widened</p>		The SPD comprises the Masterplan, IDP and village proformas.
31	SBC (Travel Plans)	1	<p>From a sustainable transport perspective, I feel there is a lack of detail that may enable developers to provide a minimal standard rather than the exemplary standard that this opportunity affords. Whilst covered in the Framework Travel Plan, I would suggest that certain details are emphasized in the Draft Village Proformas and Infrastructure Requirements, lest they become overlooked when the detailed plans are drawn up.</p>	Cross refer to FTP	Noted. Further to the SPD, the applications will be required to conform with Design Codes which will secure the necessary sustainable transport infrastructure.
31	SBC (Travel Plans)	2	<p>References to cycle paths are described as “to provide walking and cycling network improvements...” but in the framework travel plan we are specifying quite ambitious width and prevalence. Should we signpost to this SPD for further guidance on the standard required?</p>		The Framework Travel Plan is being addressed to reflect comments received through the consultation process. When 'adopted' the FTP and Obligations SPD, along with other SPD, will form a suite of documents that will inform the decision making process; i.e. it is not required that they are cross referencing.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
31	SBC (Travel Plans)	3	<ul style="list-style-type: none"> • In village centres, and any public hubs that will see a congregation of people, the infrastructure should include cycle parking (as per our cycle parking standards) Whilst this would be picked up by the Development Management Process, developers will need to be aware that it is needed and provided for. 		Noted
31	SBC (Travel Plans)	4	<ul style="list-style-type: none"> • References to public transport are “provide public transport services...” and does not refer to the supporting infrastructure that accompanies a bus service, such as bus stops / shelters / hard standing / real-time displays. 		This will be secured through the Development Management Process. Notwithstanding this, the FTP makes further reference to the provision of bus infrastructure etc.
31	SBC (Travel Plans)	5	<ul style="list-style-type: none"> • There is no reference to the provision of car club bays. The framework travel plan recommends one on-street bay per 500 dwellings. Developers will need to build in this provision, and be prepared for the TRO costs that accompany each bay. 		Agreed and will be developed through the planning application process which will require development to be compliant with adopted and emerging policy including the framework travel plan.
32	Wiltshire Council (Archaeologist)	1	I fully support and reiterate the comments already submitted by the Swindon Museum and Art Gallery. I echo their concern that the NEV will create some of the largest and most significant collection of archaeological archives in the Borough which highlights the imperative and obligation to create a new storage facility for this material as part of NEV.	Costs included	Noted, the IDP, seeks to secure contributions towards archaeology including evaluation, conservation and potential storage.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
32	Wiltshire Council (Archaeologist)	2	There is also an unprecedented opportunity to create positive heritage outcomes for NEV communities by the creation of a heritage centre linked to the store as part of the NEV		Noted.
32	Wiltshire Council (Archaeologist)	3	The Summary table of shared and specific infrastructure included in Section 4.19 should therefore include a museum storage facility and heritage centre, plus green open space to preserve and enhance areas of significant cultural heritage which are going to be preserved- such as the Scheduled Monument and other areas.		Noted, the IDP, seeks to secure contributions towards archaeology including evaluation, conservation and potential storage.
32	Wiltshire Council (Archaeologist)	4	The main issue I wish to raise is in relation to the Draft Illustrative Masterplan (Fig 1 of SPD). The Masterplan I understand will evolve as applications come in. However, if this SDP involves any formal adoption of the Masterplan at this stage then there are serious issues to raise in relation to cultural heritage. For example, it is missing crucial known heritage features such as the Scheduled Monument (Roman town of Wanborough) which is not indicated. Close to the Roman town, and Lotmead Farm, it also does show a block of housing that has not been agreed that impacts on the Scheduled Monument.		The Masterplan constraints, based upon areas which are, for example, scheduled monuments or within flood zones are excluded from development. The scale of the Masterplan and the need for clarity does not permit all constraints information to be depicted.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
32	Wiltshire Council (Archaeologist)	5	Moreover, in Masterplan indicates a range of new roads, cycle ways and paths. Some have a negative impact on known archaeological features, such as the medieval earthworks at South Marston Farm will have to be changed. Additionally, large areas of the proposed NEV area has not been evaluated and assessed in terms of archaeological remains. The new proposed infrastructure will have to change when the results of the archaeological assessment have be assimilated that have not been done yet. This is especially true of the new proposed Southern Connector Road where archaeological remains are likely to be a constraint on where the road can be constructed.		This point is acknowledged and accepted. All planning applications will be subject to archaeological assessment and evaluation. Development will be required to be carried out “in broad accordance” with the approved Masterplan and, where relevant, constrained by the results of archaeological evaluation.
33	Dorset & Wiltshire Fire and Rescue	1	All developments to comply with Approved Document B or equivalent standards as agreed with DWFRS and local planners. This would include; distances form the curb side to the front door, weight capacity for hard standing around buildings, appropriate protection between different uses, including garaging underneath residential use.		Such considerations will be considered at the detailed planning stage.
33	Dorset & Wiltshire Fire and Rescue	2	Consideration for all residential properties to be served by a minimum 32mm diameter mains water supply (this will allow for any post development ‘fit’ of a sprinkler system if/when required.)		Such considerations will be considered at the detailed planning stage.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
33	Dorset & Wiltshire Fire and Rescue	3	Appropriate fire hydrant provision throughout the development for both commercial and residential use in consultation with DWFRS and to current standards.		This is clearly referenced in the village proformas.
33	Dorset & Wiltshire Fire and Rescue	4	Consideration for sprinklers to be provided for all public, community use and commercial buildings.		Such considerations will be considered at the detailed planning stage.
33	Dorset & Wiltshire Fire and Rescue	5	All traffic routes to be accessible at all times for emergencies for responding DWFRS vehicles, this to include; bus gates, bridges (height and width) and traffic controlled access points.		Emergency access to bus only routes, as suggested for Great Stall East, will be subject to TRO. All other routes will form Highway Maintainable at Public Expense where prescribed and designed to cater for emergency vehicles elsewhere.
33	Dorset & Wiltshire Fire and Rescue	6	Any traffic calming/control measures to be of a design that does not unduly impede emergency response progress, specifically concerning the design and location of 'speed bumps' and raised road 'beds'.		The traffic calming measures will be designed to accommodate all user groups, but will primarily be designed to control speed and improve local environmental conditions. Balancing expedient emergency vehicle access over safety will be considered through the planning process.
33	Dorset & Wiltshire Fire and Rescue	7	Consideration for a fire station to be sited at the most southern point of the NEV development area with direct access onto the improved southern arterial routes from the NEV towards Common Head roundabout. This fire station would be best placed within a shared community use facility, such as; health and wellbeing centre, and would require 24 hour 365 day access for an emergency response. The type of duty system requiring staff to be present at the fire station has not been confirmed but it is not anticipated that staff would carry out routine work activities at night.		This may be considered a Borough wide issue and will be considered further.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
33	Dorset & Wiltshire Fire and Rescue	8	8. DWFRS would encourage landscaping and planting that did not provide for secluded or 'out of sight' public areas and the use of plants with a manageable maintenance profile.		Point noted. However, will be considered at the detailed Reserved Matters stage.
33	Dorset & Wiltshire Fire and Rescue	9	Any; lakes, pools, canals, water courses to be suitably designed and maintained to minimise the risk of entanglement and for them to be provided with suitable lifesaving equipment and signage.		Such considerations will be considered at the reserved matters stage.
34	Wiltshire Wildlife Trust	1	The Trust welcomes recognition of the need to provide more detailed advice and guidance.		Noted.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
34	Wiltshire Wildlife Trust	2	<p>1.5 This comprehensive approach needs to include the principle requirement for a comprehensive Green Infrastructure Strategy for the whole of the NEV. The Trust interprets the need to create sustainable development as required by the NPPF, in line with the NPPF, Para 109:</p> <ul style="list-style-type: none"> • Minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures; <p>Para 114:</p> <ul style="list-style-type: none"> • Planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure; <p>Para 117:</p> <ul style="list-style-type: none"> • Promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan; <p>Para 118:</p> <p>opportunities to incorporate biodiversity in and around developments should be encouraged.</p>		<p>The Council, together with its partners and including the Wiltshire Wildlife Trust are working on a Green Infrastructure Strategy for the NEV. It is anticipated this will be available for public consultation in early 2017.</p>

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
34	Wiltshire Wildlife Trust	3	1.6 Effective delivery of infrastructure to enable sustainable growth at the NEV should also include the delivery of a comprehensive GI network in the right place, at the right time, ideally in advance, if not at the same time has built development proceeds.		Point noted. However considered too detailed for the SPD. The Council are working on a Green Infrastructure strategy for the NEV which will inform and guide the comprehensive delivery of GI as provided on the Masterplan.
34	Wiltshire Wildlife Trust	4	This should explicitly refer to GI as a component of the required		The Council are working on a Green Infrastructure strategy for the NEV which will inform and guide the comprehensive delivery of GI as provided on the Masterplan.
34	Wiltshire Wildlife Trust	5	A comprehensive GI strategy for each development should be a material consideration.		The Council, together with its partners and including the Wiltshire Wildlife Trust are working on a Green Infrastructure Strategy for the NEV. It is anticipated this will be available for public consultation in early 2017.
34	Wiltshire Wildlife Trust	6	Green Infrastructure provision should integrate across the boundaries of the individual development sites.		Agreed. The Council, together with its partners and including the Wiltshire Wildlife Trust are working on a Green Infrastructure Strategy for the NEV. It is anticipated this will be available for public consultation in early 2017.
34	Wiltshire Wildlife Trust	7	The presumption in favour of sustainable development needs to include a test of whether the developments meets Green infrastructure and biodiversity enhancement goals and targets.		Point noted.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
34	Wiltshire Wildlife Trust	8	All developments to make provision for and meet the cost of new infrastructure; contribute to the delivery of strategic infrastructure to address cumulative impacts; These statements should apply directly to the provision of Green Infrastructure including biodiversity, in fulfilment of a comprehensive NEV GI strategy and delivery framework.		Point noted. The provision of green infrastructure is an important part of the comprehensive delivery of development at the NEV.
34	Wiltshire Wildlife Trust	9	The Trust welcomes the direct reference to Policy EN1: Green Infrastructure Network, and to Policy EN2: Community Forest.		Point noted.
34	Wiltshire Wildlife Trust	10	The Trust believes that Green Infrastructure is 'critical infrastructure' and that this should be acknowledged.		Point noted. The provision of green infrastructure is an important part of the comprehensive delivery of development at the NEV.
34	Wiltshire Wildlife Trust	11	The Trust acknowledges the challenge presented by the receipt of numerous applications. When seeking to secure funds for the shared infrastructure including GI. We believe that it is essential that the Council adopts some shared principles about the quality and extent of GI across the NEV.		Noted, work has started on a NEV wide green infrastructure strategy.
34	Wiltshire Wildlife Trust	12	We agree a holistic approach is required, including for the implementation of a coherent and holistic GI Strategy.		The Council, together with its partners and including the Wiltshire Wildlife Trust are working on a Green Infrastructure Strategy for the NEV. It is anticipated this will be available for public consultation in early 2017.
34	Wiltshire Wildlife Trust	13	Green Infrastructure and biodiversity enhancement is fundamental to a high quality, comprehensive and sustainable development.		Point noted. The provision of green infrastructure is an important part of the comprehensive delivery of development at the NEV.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
34	Wiltshire Wildlife Trust	14	Planned in the right way, the internal street network and wider principal highways could contribute directly to the biodiversity enhancement of the GI network, and development of ecological networks and corridors.		Agreed. The Council's Landscape team will provide detailed advice and input into Green Infrastructure Planning and Design.
34	Wiltshire Wildlife Trust	15	The Trust welcomes the recognition to balance environmental issues, infrastructure requirement and development viability.		Noted.
34	Wiltshire Wildlife Trust	16	4.11c A comprehensive GI strategy is fundamental to mitigating the impact of development.		Agreed.
34	Wiltshire Wildlife Trust	17	The list of infrastructure requirements prepared for each village should include GI requirements, including recreation of specific habitat types.		The emerging NEV wide green infrastructure strategy will provide more guidance on this. Open space requirements for the NEV are set out in Policy NC3 and EN3 of the Local Plan
34	Wiltshire Wildlife Trust	18	<p>The Trust would like to see the inclusion of a significant new wetland, including visitor facilities as a strategic item of GI provision. This is in line with the Statement of Common Ground signed between the Trust and Swindon Borough Council in April 2014 and submitted to the Inspector during the Public Inquiry into the Local Plan.</p> <p>All developers would globally contribute the costs of providing this which will be of a strategic benefit to all new residents.</p>		Agreed. The Masterplan shows such a wetland area in diagrammatic form. Further work on Green Infrastructure Planning and Landscape/Habitat Planning will seek to ensure delivery of well-balanced GI infrastructure, including extensive areas for wildlife.
34	Wiltshire Wildlife Trust	19	An ecological Visitor facility should be added to table 1. as shared infrastructure.		Noted, work has started on a NEV wide green infrastructure strategy.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
34	Wiltshire Wildlife Trust	20	Appendix B, a. We welcome the inclusion of the statement, ‘...defined by the network of green infrastructure corridors’.		Noted.
34	Wiltshire Wildlife Trust	21	Appendix B, b. We welcome the bullet, ‘an extensive green infrastructure network that maximises opportunities for habitat connectivity and enhanced biodiversity including extending the River Cole green infrastructure corridor and connecting Nightingale Wood’ The components of this GI network need to be defined.		Noted. The NEV GI Strategy will provide further details.
34	Wiltshire Wildlife Trust	23	Appendix D, a. We welcome the statement, ‘to secure development that improves the economic, social and environmental conditions, and promotes health and wellbeing’. The Trust believes that access to nature is of fundamental importance and essential to human health and wellbeing. Through this NEV development Swindon Borough Council has an opportunity to set a new benchmark for sustainable development, fulfilling economic, social and environmental goals, putting health and wellbeing of NEV residents at the centre of a comprehensive GI strategy benefitting both people and wildlife.		Noted.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
34	Wiltshire Wildlife Trust	24	Appendix D, b. Future detailed design submissions should be guided by a design code for Green Infrastructure which supports the restoration of priority habitats and species. For example, Flood Plain grasslands and meadows, Wetlands, Bittern and Curlew.		The Council, together with its partners and including the Wiltshire Wildlife Trust are working on a Green Infrastructure Strategy for the NEV. This will provide information and guidance on the GI typologies/assets to be delivered/protected and enhanced across the NEV.
34	Wiltshire Wildlife Trust	25	<p>Swindon Borough Council has already approved an exemplar GI component to the Tadpole Farm Garden Village development with the restoration of 40 hectares of wildflowers meadows adjacent to the river Ray.</p> <p>The Trust would be happy to continue to support Swindon Borough Council in thinking strategically about how a comprehensive green infrastructure network across the NEV could be developed. This could build on the Trust's comprehensive knowledge and understanding of the wildlife and habitats of Swindon Borough.</p>		Support noted.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
36	Oxfordshire County Council	1	Oxfordshire County Council believes the large increase in dwellings at the Swindon end of the A420 will increase the usage of this route towards Oxford and the Science Vale area. Modelling and trip assignments need to be assessed in order to understand what proportion of the new residents will be travelling along the A420 towards Oxford. It is Oxfordshire County Council's opinion that a significant proportion of the new trips created by the NEV will be eastbound on the A420 towards Oxford, exacerbating the congestion already experienced. The development will be required to mitigate its effects on the A420 (and other roads) within Oxfordshire. These works will need to conform to Regulation 123 of the Community Infrastructure Levy.		SBC have commissioned further traffic modelling to better understand the traffic distribution along the A420 corridor. Should this work establish the necessity for a wider Transport Package then the SPD secures the opportunity to revise the Infrastructure Delivery Plan to account for this.
36	Oxfordshire County Council	2	It is essential that the NEV development contributes towards bus service improvements that serve Oxford and employment centres in the Vale of White Horse adjoining district, specifically Science Vale. The development should fund a fast and frequent bus service to enable the new residents a good alternative to the personal car for commuting to work in this area.		Each development parcel will be required to contribute to bus service provision to link their development with a list of wider destinations that will include Oxford etc.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
36	Oxfordshire County Council	3	<p>Swindon Borough Council are part of the A420 Working Group which also includes Oxfordshire County Council Officers and Councillors, Vale of White Horse District Council, and Western Vale Villages Consortium. SBC are aware of the cross county boundary issues facing the A420. The application documents should include wording to commit SBC to fully assess the NEV impact on the Oxfordshire road network, and to ensure the development mitigates these impacts.</p>		<p>SBC have procured further modelling work to understand the impact upon the A420 corridor beyond its boundaries. This modelling will determine whether a wider mitigation package is necessary and this will be considered upon review of the Infrastructure Delivery Plan.</p>

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
37	SBC (Public Health)	1	<p>Whilst the SPD is focused on different elements of infrastructure we would like to promote a holistic view for health services. This is consistent with the strategic direction for health and social care support to be delivered via a health campus model and the direction of the Swindon Sustainability and Transformation Plans (STP). We would strongly encourage looking at delivery of a flexible infrastructure that provides multiple services under a single roof. We would promote a vision for New Eastern Villages which is to develop a healthy lifestyle centre concept, implemented with a central hub and then satellite centres which could offer self management options such as IT facilities to get information, provide virtual access to health advice, and take basic health measurements. A healthy living centre should offer integrated health services including:</p> <ul style="list-style-type: none"> -Lifestyle support (stop smoking, NHS health checks, weight management, physical activity support etc.) -Pharmacy -Dentistry -Opticians -Space for mental health and wellbeing services -Library / information points -Space for charities to use -Access in the evening for exercise classes, book clubs, stress management classes etc. -GP services 	Amendment to GSW proforma	Noted.

An example of the approach that goes beyond health to look at employment, health improvement and skills development under one roof is the Bromley-By-Bow healthy living centre (<http://www.bbhc.org.uk/>). This is a social enterprise which persuaded the NHS to allow a small independent charity to build a health centre owned by the patients.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
37	SBC (Public Health)	2	<p>There are some key evidence based elements for new developments to promote healthy lifestyles and an overall healthy town, which we would encourage developers to implement as part of their commitment to developing a healthy town (specific evidence of benefit to health and also housing prices and desirability can be provided if required):</p> <ul style="list-style-type: none"> -20mph limits on streets to reduce road accidents -Street design to facilitate street closure to allow for Playing Out initiatives -Promotion of walking and cycling infrastructure -High quality public realm – we would strongly support smoke-free district and village centres. Bristol has successfully trialled two smoke-free public squares. -Awareness of best practice for suicide prevention e.g. building bridges or car parks with safety barriers to make it difficult to jump -Refusing or limiting the number of applications for facilities such as off licenses, betting shops, fast food shops, tanning shops. There are examples of development management policies from other areas of the country which address this e.g. Haringey (Policy SDM56 Hot food takeaways which bans new hot-food takeaways from opening within 400m of primary and secondary schools), Warwickshire (limiting the number of hot food takeaways (A5) within a 400m boundary of secondary 		<p>The street design elements will be a matter for consideration through the design and planning process. It is anticipated that Design Codes will be secured to address these points.</p>

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
			<p>schools) and Newcastle (Policy CS14 requires development to contribute to creating an age-friendly, healthy and equitable living environment, promote allotments and gardens for exercise, recreation and for healthy locally produced food, and control the location of, and access to, unhealthy eating outlets.)</p> <p>-Inclusion of allotments / community gardens and farms</p>		
37	SBC (Public Health)	3	<p>Research from Public Health England and the Town and Country Planning Association on Building the foundations: Tackling obesity through planning and development identified 6 key elements for planning healthy weight environments covering movement and access, open spaces, play and recreation, food, neighbourhood spaces, buildings and local economy. A visual image of this is given at the end of this document or is available on page 9 of http://www.tcpa.org.uk/data/files/Health_and_planning/Health_2014/PHWE_Report_Final.pdf</p> <p>Based on the current profile of Swindon and a 2.4 people average household size, 8000 houses equates to an additional 19,000 people. Current data suggests 10,000 of these would be overweight and 4,600 would be physically inactive. Therefore creating a healthy environment that promotes physical activity is crucial to reduce these numbers.</p>		Noted.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
37	SBC (Public Health)	4	<p>Is the facility required on site? If so, what will the facility 'look like'?</p> <p>We would support and encourage a shared facility that includes health provision as one element of community engagement and develops a community hub that people feel ownership of when they move in as somewhere to go for leisure, social activity, and health. This should be at a central point on the site where there is good walking, cycling and public transport access. Linking this to outside space such as a children's play area or community orchard would encourage community ownership and not just somewhere to go when someone is ill. This could be embedded provision as part of planned infrastructure such as extending a supermarket or part of a school.</p>		Noted.
37	SBC (Public Health)	5	<p>NHS England and Swindon CCG can provide information on the capacity in existing provision. However there will be critical points when local health provision would be needed – this depends on whether it can be part of an integrated approach within a multi-use facility in which case building this at an early stage but with a strategy for what phased service provision should look like and a plan for rental uptake would be an option.</p>		<p>Point noted. The Council are committed to working with all service providers and its partners to ensure appropriate facilities are secured at the district centre and also local services at village locations (where required). This will include appropriate provision for community related services including libraries, leisure and other health and well-being services.</p>

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
37	SBC (Public Health)	6	An interim strategy will be required as services will be needed as soon as housing is developed: however there is existing provision within Swindon that could cope with a limited increase. A model to support forecasting health demand has been provided to Swindon CCG and this can be used to plan an interim strategy. For public health services we will include growth projections in our commissioning plans, and the development of future joint strategic needs assessments will explicitly include assessments of built environment impact and the impact of new development.		Point noted. The Council will continue to work proactively with healthcare providers to prepare an interim strategy.
37	SBC (Public Health)	7	We support the approach of having a S106 agreement to ensure parity of contribution and that providing appropriate infrastructure is a key part of creating an effective and desirable community and should be part of the responsibility of developers to contribute to an overall strategic approach.		Noted.
37	SBC (Public Health)	8	Para 3.3 is crucial – i.e. a holistic approach to deliver in the right place at the right time. This should extend to the way infrastructure is used as well as the buildings themselves.		Noted.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
37	SBC (Public Health)	9	Although we support the idea of a vision and objectives for each village, there is some provision such as health and community facilities that need to be delivered across NEV and we would promote the idea of a central hub with satellite provision which may offer different specialisms in different localities.		Point noted. The IDP sets out clearly the requirement for additional health facilities at the NEV. The Council are working closely with health care providers to ensure appropriate facilities are secured at the district centre and also local services at village locations (where required).
37	SBC (Public Health)	10	Appendix B sec b – we fully support the work on sustainable travel links. The Park and Ride site should include space for cycles and the option of a ‘Boris bikes’ style scheme.		The Park and Ride will be required to have cycle parking facilities. The option to have rentable bikes may be researched and implemented as part of the FTP.
37	SBC (Public Health)	11	Appendix B sec b – this lists infrastructure in terms of sports and leisure, education, community facilities and a healthcare facility separately. As described above whilst all this provision is needed, we would strongly encourage a more holistic view of how buildings could be used to provide multi-use, multi-purpose centres.		Point noted. The Council are committed to working with all service providers and its partners to ensure appropriate facilities are secured at the district centre and also local services at village locations (where required). This will include appropriate provision for community related services including libraries, leisure and other health and well-being services.
38	SBC (Landscape)	1	Frequent mention of on-site and off-site (4.2, 4.11 to 4.15 in SPD) without definition. Does on site mean within the red line of the application and off-site elsewhere in the NEV or does on site mean within the NEV and off site outside of the NEV (such as Highway Infrastructure, Central Area Public Realm)? 4.12-4.15 should define.		The SPD clarifies on and off site infrastructure. Furthermore, the village proformas sets out in more detail the types of infrastructure required on and off site for each of the villages.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
38	SBC (Landscape)	2	Nightingale Wood will serve as a local country park and point of destination. It is a key doorstep facility certainly for development north of that A420 and most likely a destination for the whole NEV. This should be shown as context on the Master plan (grey tone but clear in extent/form). The North East boundary to Rowborough should show through connection aligned to the woods footpath network.		The emerging GI Strategy, together with Great Western Community Forest policies within the Local Plan enable funding for current project delivery in SBC including adjacent areas to the NEV. The GI Strategy for the NEV will look further into the need for off-site mitigation, access and models for delivery.
38	SBC (Landscape)	3	Suds only appears in name as an off- site element. It should read as a commitment from source, in the built zones, to the site perimeters and off-site (to be defined). Add to Nightingale comment in Infrastructure requirements		Noted.
38	SBC (Landscape)	4	‘Outdoor sports...1.6ha per 1000 population’ This document should be explicit about the acceptable uses for all the sports land allocation. At present there is a shortfall balance of 0.4ha. And some examples of acceptable uses should be articulated otherwise in the face of development pressure this 0.4ha will be lost to outdoor sports and not used for say, court sports netball tennis or as a bowling green or even just as spare space to provide flexibility for pitch alignment or variation in size from say junior to senior as the local demographic changes		The provision of outdoor sports must be in accord with Policy NC3 and EN3 of the Local Plan. The emerging NEV wide green infrastructure strategy will provide more detail on this.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
38	SBC (Landscape)	5	‘To protect on-site ...archaeological assets..’ - this type of land may contribute to GI but will not/ cannot be classed as use-able open space if, due to its location it is peripheral to the development or due to archaeological constraints cannot be developed as open space i.e. paths cannot be constructed across it cannot be planted or maintained to allow public access.		Agree. This has been reflected in the revised village proformas.
38	SBC (Landscape)	6	<p>‘The provision of sports hub’</p> <p>This will be a point of contention if some guidance size is not given. The land requirement for the Primary School has been defined why not the land requirement for the Sports "Hub" as this will aid the developer in understanding what is required and configuring the development configuration accordingly</p>		Agree.
38	SBC (Landscape)	7	The master plan should be indicative as no approval should be given at this stage for the loss of hedgerows or trees. If we are saying the plan forms the planning background for subsequent applications, perhaps 4.9 of the SPD could make this clear that such details will need to be approved in subsequent strategies (along with other details, watercourses, flood storage etc.).		Agreed.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
38	SBC (Landscape)	8	The master plan and SPD do not sufficiently illustrate and emphasise the nature and importance of GI across the development i.e. potential for extensive, ecologically rich areas which could help define the development. Need for a comprehensive ecological strategy with clear ecology and biodiversity objectives. To include 'landmark' area e.g. wetland reserve and visitor centre. No indication of how the £10m nature reserves in the infrastructure requirements relates to the master plan ?		Agreed. The evidence base has been compiled and informs the Draft Masterplan. A comprehensive GI strategy has been drafted.
38	SBC (Landscape)	9	Concerns over fragmentation of GI corridors, with regard to narrow corridors, road layout/crossings of watercourses. Design of movement corridors/structures/bridges must permit and enhance easy access for people and wildlife along the resultant GI corridors		Noted, work has started on a NEV wide green infrastructure strategy.
38	SBC (Landscape)	10	Connectivity to Swindon's existing GI and west to River Cole/Oxfordshire needs more consideration/better definition.		Agreed, the GI Strategy for the NEV will help address the appropriate design, protection and integration of natural features.
38	SBC (Landscape)	11	The non-coalescence area as shown on the Local Plan appendices has disappeared. Important regarding landscape impact, helping to overcome issues of habitat fragmentation/pressures/ ecological integrity, access connectivity.		Noted, development at the NEV is in accord with Policy NC3 and the Local Plan.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
38	SBC (Landscape)	12	'Mechanism to secure delivery' does not appear to have been set out in the document.		In the interests of delivering fair and equitable distribution of the necessary planning obligations, and in the absence of 'alternative mechanism' examples submitted for consideration, the Council consider that a framework Section 106 Agreement will ensure the effective delivery and maintenance of the required infrastructure.
38	SBC (Landscape)	13	2.4 don't understand this		Noted, the SPD has been revised to improve clarity.
38	SBC (Landscape)	14	What happens if developers don't sign up to framework agreement?		The Council consider that to ensure a fair and equitable distribution of the necessary planning obligations, a framework Section 106 Agreement will ensure the effective delivery and maintenance of the required infrastructure. If developers are unable to sign up to a framework agreement, the Council may require multiple landowners/developers to enter into a joint s106 agreement where appropriate.
38	SBC (Landscape)	15	2.15. No mention of biodiversity policy EN4		The village proformas specifies biodiversity requirements, as set out in Policy EN4.
38	SBC (Landscape)	16	4.2 unclear/ambiguous about what is on-site and what is off-site.		The SPD clarifies on and off site infrastructure. Furthermore, the village proformas sets out in more detail the types of infrastructure required on and off site for each of the villages.
38	SBC (Landscape)	17	4.4 external connectivity not sufficiently considered, including importance of off-site areas.		The Green Infrastructure Strategy will address this in more detail.
38	SBC (Landscape)	18	4.5 links need to be better illustrated/emphasised including those surrounding countryside.		Agreed

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
38	SBC (Landscape)	19	Phasing of GI ? Should we be arguing the case for upfront planting? Part of noise attenuation, enabling works including major highway infrastructure		In accord with policy and as set out in the village proformas, on and off site planting schemes will be required.
38	SBC (Landscape)	20	Biodiversity gain only considered as 'on-site'. Needs to be included as strategic scale i.e. look for net gain across the development, greater than the sum of the parts		Agreed, the GI Strategy will help to address this.
38	SBC (Landscape)	21	South Marston and Rowborough Villages: <ul style="list-style-type: none"> •Woodland cover as illustrated appears low. •The importance of Nightingale Woods needs to be emphasised ..to the point of considering it as part of on-site infrastructure ? Inc. potential link of wetland to NEV SUDs network ? 		Noted. There is a requirement for all development to provide and contribute towards GWCF. There is an opportunity to develop better access to Nightingale Wood through the NEV Green Infrastructure Strategy.
38	SBC (Landscape)	22	Foxbridge Village: <ul style="list-style-type: none"> •Links to the south to Warneage particularly important. 		Point noted, detail of which can be developed as part of the emerging work on the NEV GI Strategy. Reference to Warneage Wood added to the Foxbridge village proforma.
38	SBC (Landscape)	23	Great Stall East: <ul style="list-style-type: none"> •Access link needed following River Cole to allow connectivity between GI north and south of A420 (including up to Nightingale Woods) 		Noted.
38	SBC (Landscape)	24	link needed over the River Cole to connect to ROW network in Oxfordshire/line of the canal		Noted.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
38	SBC (Landscape)	25	<p>Support the spatial allocations for sports and recreation</p> <p>A spatial model allied to a cluster/hub concept helps ensure that sports provision is accessible and viable in the long term.</p> <p>It is key that sports provision is well connected to the wider open space/GI network to aid adaptability over time and facilitate none 'pitch' activities such as walking /running and cycling routes that are key to increased activity levels in the population – links with the health and wellbeing agenda going forward.</p> <p>The actual facility mix to be provided on any one specific site will depend on the developer demand modelling (using Sport England's suite of tools) based on the population profile projection for the relevant development cells.</p> <p>My concerns relate to the constraints/parameters for the delivery of the sports and recreation provision and the various open space typologies. These parameters /issues that need to be resolved are the relationship between sports provision and flooding/SuDs, the requirement for public open space to have a high degree of multi functionality as informal leisure requires useable terrain to promote activity and provide the setting for secondary sports outside of playing pitches (tennis, skate parks, MUGAs etc.)</p>		<p>Agreed, the emerging GI Strategy for the NEV will help to address these points in more detail. With regards to SuDs, the Council will be consulting upon a draft SPD in the near future.</p>
38	SBC (Landscape)	26	<p>Relationship of Archaeologically sensitive areas and open space/sports provision similarly produce conflict and limit use</p>		<p>Noted.</p>

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
38	SBC (Landscape)	27	Finally the requirements for children's play would benefit from expanding as the current Fields in Trust guidance can be subject to a pretty minimalist interpretation that can result in provision that is short of the standards SBC formerly sort.		Open space requirements will be secured in accord with Policy EN3 and Policy NC3 of the Local Plan.
39	SBC (StreetSmart)	1	• Litter bins to be provided which are of sufficient capacity and type		Noted
39	SBC (StreetSmart)	2	• Any paving should be of such a construction as to be able to take a mechanical sweeper		This is a level of detail not considered within the SPD but will be considered through the planning process and any subsequent road adoption. This issue presents a concern for some permeable paving systems and can be overcome through addressing the angle of suction on the sweeper, but still presents a maintenance concern.
39	SBC (StreetSmart)	3	Any paving should be of such a type as to limit staining and the requirement for scrubbing		Consultations will be carried out with appropriate teams and departments within SBC to ensure that such issues are taken into account.
39	SBC (StreetSmart)	4	• Limit bedding and bushes to a minimum as this attracts and contains litter and encourages inappropriate disposal of litter		Appropriate landscaping next to roads, footways and cycle routes etc., to reduce necessary and frequent maintenance regimes, will be considered through the planning and highway adoption process
39	SBC (StreetSmart)	5	Design in anti-graffiti measures and design		Such detailed matters will be considered at the reserved matters stage.
39	SBC (StreetSmart)	6	Ensure that bin stores are sufficient for commercial and domestic premises with suitable storage off of the public highway		This will be considered through design codes and planning application determination and will be subject to scrutiny against the Transport Requirements For Development, which aims to include waste collection and storage design requirements.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
39	SBC (StreetSmart)	7	Vehicle access. Road widths, parking restrictions and general road layouts to ensure refuse and recycling vehicles can access. In my experience the national planning guidelines aren't sufficient as the road widths aren't adequate once on-street parking is allowed.		The street layout and design will consider the location and demand for on-street car parking and landscaping. The suitability of the location of these elements will be determined through sufficient vehicle tracking of refuse trucks and emergency vehicles; all routes, unless specifically specified or of such low demand, will cater for two way traffic beyond any on-street features such as parking.
39	SBC (StreetSmart)	8	-House frontages to include space for off-street container storage. Sympathetic landscaping and sensible house design should enable householders to remove their containers from the pavement and store at the front of the house (or round the back without going through the house).		Consultations will be carried out with appropriate teams and departments within SBC to ensure that such issues are taken into account.
39	SBC (StreetSmart)	9	-Flats and dense housing to have containers accessible from highway without need to drive or walk on un-adopted or private land. There are a couple of live insurance cases where we may have to pay out for damage to private land from repeated access. Also include adequate enclosed bin storage as this often gets eroded during planning process or located badly.		Consultations will be carried out with appropriate teams and departments within SBC to ensure that such issues are taken into account.
39	SBC (StreetSmart)	10	On a neighbourhood wide level, public space made available for public bring sites. We may not take this up straight away but can be beneficial. This is particularly beneficial for underground waste provision (e.g. link)		Noted.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
39	SBC (StreetSmart)	11	Developer contributions to waste infrastructure including waste transfer site at Waterside and civic amenity site provision in locality.		Unless directly related to development at the NEV there is no policy basis to secure contributions towards the waste transfer site at Waterside.
40	Wilts & Berks Canal Trust	1	Concentrating on the canal route as shown in the Master Plan, WBCT is unable to see how land drainage is adequately dealt with. The impact of the deep bowl* effect on floodwater will restrain these waters, unable to escape from one of the Nation's largest housing developments.*Collecting from the Marlborough Downs, the topography, soil type and geography of the subject area creates the effect of a large water bowl with bottlenecked and limited outflow possibilities. First serious effects of this were witnessed in 2007 when unusually high rainfall closed the A 420 to flooding for a significant period at Acorn Bridge.		Noted. The NEV 'SUDs Vision/SPD will be available for consultation prior to formal adoption. It addresses flooding in more detail in line with the Adopted Local Plan.
40	Wilts & Berks Canal Trust	2	The SBC consultation document on the SUDs raise the issue of long term responsibility and maintenance which it seems SBC will not take on. At least some of this responsibility (i.e. to keep the SuDS and or canal in working order) could be managed by WBCT on a paid basis from the developers.		Noted. The emerging NEV SuDS Vision draft SPD will provide more guidance on this matter.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
40	Wilts & Berks Canal Trust	3	<p>Present provisions for “individually-assessed-development-created-water attenuation”</p> <p>(SuDS) relies on the flimsy practice for developers to provide for minimal local flood water attenuation. WBCT can see no provision for collective attenuation</p> <p>and or 100-year flash flood event considerations.</p>		Noted. The emerging NEV SuDS Vision draft SPD will provide more guidance on this.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
40	Wilts & Berks Canal Trust	4	<p>In providing for local attenuation, present planning law deals with traditional run off volume but it ignores 1) speed of runoff caused by development compared with farmland, 2) flash flooding effects from unstable climate conditions and 3) the aggregate volume of water runoff caused by the several linked developments thereafter. SBC master plan does not consider this critical subject at all. The proposed canal forms a barrier to the run-off from the downs and can divert storm flows to by-pass the Acorn Bridge constriction. Normal canal maintenance would include maintaining cross-drainage structures, which throttle run-off to create the attenuation ponds, and the gravity inflow channels, which divert storm flow into the canal. In this way there will be a reduced reliance on SuDS provided by the developers which can be reduced in size and require less maintenance. SBC propose that each developer will be responsible for providing SuDS to attenuate peak run-off from the impermeable surfaces of their development such that it is the same as that from the original farmland for the 1 in 100-year storm.</p>		<p>The Council acknowledges that a canal can provide some of the main principles of an overall SuDS scheme to provide drainage and flood risk benefits and it has been recognised in the emerging SuDS Vision SPD that if delivered as part of the development, the canal can be part of the drainage solution for some areas of the development.</p> <p>Therefore the Council is happy to consider the canal as part of the drainage solution for a development parcel, where it is being proposed by the applicant however, we cannot specify which drainage solutions are used to meet the requirements of an overall SuDS scheme.</p>

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
40	Wilts & Berks Canal Trust	5	SBC propose that each development will be responsible for providing SuDS to attenuate peak run-off from impermeable surfaces of their development such that it is the same as that from original farmland for the 1 in 100 year storm. This relies on 1) the method of calculating the 1 in 100 year runoff, which will be different for the relatively small development area when compared with the whole River Cole 2) that the SuDS are maintained and 3) that there is adequate capacity over and above the volume of standing water since percolation is slow in clay soils.		Noted. The emerging NEV SuDS Vision draft SPD will provide more guidance on this.
40	Wilts & Berks Canal Trust	6	Size of the SuDS ponds will depend on the estimate of how much stagnant water remains in the ponds following a storm, hence how much attenuation capacity is available for the next storm. The developer will wish to optimize the pond size and this may compromise the efficiency of SuDS.		Noted. The emerging NEV SuDS Vision draft SPD will provide more guidance on this.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
40	Wilts & Berks Canal Trust	7	<p>Note that the developments are to be built on islands set above the floodplain so as to be above the 1 in 100 flood level in the catchment, but what is this level? The only way to know the flood level is to carry out a holistic hydrodynamic numerical model of the River Cole catchment with and without the NEV to assess the effect of the islands on predicted flood levels and flows. Tagging the canal on to this model will show how the canal forms a flood barrier to protect the NEV. Such a model needs to be instigated by SBC.</p>		<p>The SPD and Masterplan show the main development islands to be outside of the flood zones 2 and 3. There will be a need for strategic infrastructure to be in flood zones 2 and 3 which may need to be above the 1 in 100 year plus climate flood level.</p> <p>The Environment Agency (EA) already have detailed modelling information for the NEV and Flood Zones 2 & 3 are based on these flood modelling extents, Flood Zone 3 being the 1 in 100 year flood extent and Flood Zone 2 being the 1 in 1000 year flood extent. Therefore the existing ground levels on the proposed development Islands are very likely to be above the 1 in 100 plus climate change level.</p> <p>There will be a need for strategic infrastructure to be in flood zones 2 and 3 which may need to be above the 1 in 100 year plus climate flood level. The flood levels, which will vary across the NEV development area, can be obtained from the EA.</p> <p>SBC as the Lead Local Flood Authority (LLFA) are not responsible fluvial flood risk. The management of Fluvial flood risk is under the jurisdiction of the EA. As the canal will be a raised structure in the flood plain the EA would need to consider the feasibility of the canal with regards to flood risk, to ensure it will not increase the flood risk else where as well as it being a flood defence structure. In order for this to be considered in relation to the NEV development proposals, we feel that full plans for the canal will need to be submitted as part of a planning application.</p>

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
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40	Wilts & Berks Canal Trust	8	Acting as a responsible local stakeholder, WBCT have produced two detailed Technical Notes on the subject: Note 1 (dated March 2016), which deals with Water Management generally and describes how the Wiltshire and Berkshire canal provides flood mitigation and Note 2 (dated April 2016), which describes how the canal can provide a flood barrier to protect the NEV. Both Technical Notes are attached explaining in engineering detail how the canal and its related infrastructure can act as proper conduit for aggregate volume water egress.		Noted.
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40	Wilts & Berks Canal Trust	9	As demonstrated throughout the UK and Europe, canals add value to residential development, provide for leisure and recreation and public amenity to the localities through which it travels.(https://www.youtube.com/watch?v=dg0B_2v-bLk).It is therefore illogical that SBC has all but ignored the canal within its master plan; to the extent that its planned corridor is marginalised and out of sight and contact with their urban development plans.		The Council recognises and welcomes the significant benefits that future delivery of the Wilts & Berks Canal within the NEV would bring for existing and new communities. In accord with Local Plan policy, development should not compromise the delivery of the canal at the NEV. However, the Council cannot enforce delivery through the planning process.
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40	Wilts & Berks Canal Trust	10	The planned layout of the NEV infrastructure as described in the SBC planning reports includes footpaths and cycleways. These can connect with the canal tow path to form a network.		Agreed.
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Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
40	Wilts & Berks Canal Trust	11	<p>As part of the whole, WBCT master planning has also reviewed the traffic planning and road infrastructure plans proposed as it might affect the development and access to the canal. WBCT consider the fragility of the presently planned road infrastructure makes it unlikely the road network will be able to cope satisfactorily with peak traffic flows from more than presently planned 6,650 new dwellings; it will certainly not support additional recreational and leisure activity as envisaged with the canal in position because there will be public pushback to engagement with the canal leisure offering.</p>		<p>The planned road infrastructure has been designed to cater for the full development, plus natural growth on the network. In this regard, the proposed network is not considered fragile and SBC consider the capacity of this network sufficient to accommodate the extra leisure trips which would also be unlikely to coincide with the natural network peak hours.</p>
40	Wilts & Berks Canal Trust	12	<p>Include: Policy EN6 The risk and impact of flooding will be minimised Swindon Borough will require a considered approach to sustainable drainage from the outset of the proposed development, including drainage management. This will include specialist input from the outset of the design and agreement of eventual ownership and management of the components involved.</p>		<p>Policy EN6 is referenced in all of the village proformas as a key consideration.</p>

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
40	Wilts & Berks Canal Trust	13	Policy EN11 with particular reference to: The alignments of the Wilts & Berks Canal and North Wilts Canal, as shown indicatively on the Policies Map, shall be safeguarded with a view to their long term re-establishment as navigable waterways, by... ensuring associated infrastructure of development does not prejudice the delivery of the canal.		The Council recognises and welcomes the significant benefits that future delivery of the Wilts & Berks Canal within the NEV would bring for existing and new communities. In accord with Local Plan policy, development should not compromise the delivery of the canal at the NEV. However, the Council cannot enforce delivery through the planning process.
40	Wilts & Berks Canal Trust	14	Lotmead Page 13: Add Local Plan Policy EN11 Page 14/15: Appropriate for onsite contribution for Canal as part of GI. Integration of canal as a part of land drainage could allow construction as part of development 1550 Dwellings		Point noted, although the canal route does not travel through Lotmead village.
40	Wilts & Berks Canal Trust	15	Lower Lotmead Page 17 Add Local Plan Policy EN11 Page 19/20 Appropriate for onsite contribution for Canal as part of GI. Integration of canal as a part of land drainage could allow construction as part of development 800/900 Dwellings		Lower Lotmead village proforma updated to reflect this.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
40	Wilts & Berks Canal Trust	16	Redlands Page 22 Add Local Plan Policy EN11 Page 23/24 Appropriate for onsite contribution for Canal as part of GI. Integration of canal as a part of land drainage could allow construction as part of development 300/400 Dwellings		Noted.
40	Wilts & Berks Canal Trust	17	Foxbridge Page 25 Add Local Plan Policy EN11 Page 26/27 Appropriate for onsite contribution for Canal as part of GI. Integration of canal as a part of land drainage could allow construction as part of development 700 Dwellings		Updated on the Foxbridge village proforma.
40	Wilts & Berks Canal Trust	18	Add Canal to IDP (see table on next page) The existing IDP has £34,429,000 allocated for Major Open Space, £3,320,800 for Local Open Space, and £10,906,000 for a Nature area. Some of this funding is already allocated to providing the green space of the canal line and could be used to construct the canal. Insert an additional infrastructure item - Wilts & Berks Canal - Construction of canal from Commonhead to A420 Acorn Bridge - £35million - shared on and off site - WBCT feasibility Reports		The Council recognises and welcomes the significant benefits that future delivery of the Wilts & Berks Canal within the NEV would bring for existing and new communities. In accord with Local Plan policy, development should not compromise the delivery of the canal at the NEV. However, the Council cannot enforce delivery through the planning process.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
40	Wilts & Berks Canal Trust	19	The SPD now includes the canal corridor as a protected route within the development and WBCT congratulates SBC on this change to the proposals. However, WBCT believes that more needs to be included within the SPD in order that the NEV development and infrastructure gains the benefits that a built canal will provide.		The Council recognises and welcomes the significant benefits that future delivery of the Wilts & Berks Canal within the NEV would bring for existing and new communities. In accord with Local Plan policy, development should not compromise the delivery of the canal at the NEV. However, the Council cannot enforce delivery through the planning process.
40	Wilts & Berks Canal Trust	20	WBCT believes that the construction of the canal, and properly integrating it with the development islands of NEV, will produce a distinctive and beneficial character to this exciting and significant new development on the east of Swindon.		Noted.
40	Wilts & Berks Canal Trust	21	WBCT state that the canal will provide a green and blue corridor for enjoyment by both people and wildlife. It will provide a significantly enhanced and effective drainage and flood relief solution to both urban runoff and A420 drainage.		Noted.
40	Wilts & Berks Canal Trust	22	The canal will provide recreational and leisure opportunities for NEV residents and others in Swindon. It will connect with other wildlife corridors and it will enhance property values along the canal route.		Noted.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
40	Wilts & Berks Canal Trust	23	WBCT further believes that the construction of the canal and the consequent enjoyment of these benefits outlined above, should be as part of the NEV infrastructure, funded by the developer.		The Council recognises and welcomes the significant benefits that future delivery of the Wilts & Berks Canal within the NEV would bring for existing and new communities. In accord with Local Plan policy, development should not compromise the delivery of the canal at the NEV. However, the Council cannot enforce delivery through the planning process.
171	The Basingtoke Canal Society	1	I wish to comment on the draft SPD for the Eastern Villages. I am very pleased to see that the draft proposes that the line of the Wilts & Berks Canal will be protected from developments. This is very encouraging bearing in mind that the W&B Canal is a very significant and ambitious project which will need considerable local authority support if the re-opening of the canal is to be achieved. Although the inclusion of the route of the canal, within the SPD, is extremely welcome, there are some related issues which I would urge the Council to take into account and to modify the draft SPD accordingly. These are; 1. The cost of constructing the 7 miles of canal should be included as part of the infrastructure proposals for the Eastern Villages.		In accord with Local Plan policy, development should not compromise the delivery of the canal at the NEV. However, it cannot enforce delivery through the planning process. In the short term, the safeguarded route presents a recreational opportunity for walking, cycling and biodiversity gain.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
171	The Basingtoke Canal Society	2	2. The cost of constructing this length of the canal should be borne by the developers who will secure considerable financial benefit from having the canal within their plans. For example, there is ample evidence to show that the values of houses constructed on or near navigable waterways are considerably increased by their proximity to the water.		In accord with Local Plan policy, development should not compromise the delivery of the canal at the NEV. However, it cannot enforce delivery through the planning process. In the short term, the safeguarded route presents a recreational opportunity for walking, cycling and biodiversity gain.
171	The Basingtoke Canal Society	3	3. The new canal length would provide opportunities to incorporate flood relief measures within the development plans.		Point noted. The Council acknowledge that a canal can provide some of the main principles of an overall SuDS scheme to provide drainage and flood risk benefits and it has been recognised in the emerging SuDS Vision SPD that if delivered as part of the development, the canal can be part of the drainage solution for some areas of the development. Therefore, the Council are willing to consider the canal as part of the drainage solution for a development parcel, where it is being proposed by the applicant however, we cannot specify which drainage solutions are used to meet the requirements of an overall SuDS scheme.
171	The Basingtoke Canal Society	4	4. The canal would certainly make the Eastern Villages a more attractive proposition to the prospective home owners. People are fascinated by water and by the life that waterways bring to an area. They also like to see boats and other water based activities - fishing, towpath cycling/walking, canoeing , nature study etc.		Point noted.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
171	The Basingtoke Canal Society	5	A built canal would considerably enhance recreational opportunities for the residents on the Eastern Villages and would improve their health and well-being.		Point noted.
171	The Basingtoke Canal Society	6	6. The canal would make a significant contribution to ecological diversity - it would attract a wider range of wildlife including birds, aquatic plants and insects.		Point noted.
188	Wilts & Berks Canal Trust	1	<p>Covering letter sent out to all W&BCT members to respond to the NEV Planning Obligations Draft SPD and associated documents.</p> <p>Bullet points:</p> <ol style="list-style-type: none"> 1. It's very good to see that the protected canal route has been included 2. The construction of the canal must be included as part of the NEV infrastructure 3. The canal should be funded by the developers 4. The canal offers opportunities for flood relief and land drainage 5. The canal offers a wonderful opportunity to make a distinctive character for the NEV 6. Working canals in other locations have created property uplift, and will do so here as well 7. A built canal will create both recreational and leisure assets as well as improving people's well-being 8. A built canal will create wildlife habitat assets and increase biodiversity 		The Council recognises and welcomes the significant benefits that future delivery of the Wilts & Berks Canal within the NEV would bring for existing and new communities. In accord with Local Plan policy, development should not compromise the delivery of the canal at the NEV. However, the Council cannot enforce delivery through the planning process. In the short term, the safeguarded route presents a recreational opportunity for walking, cycling and biodiversity gain.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
188	Wilts & Berks Canal Trust	2	Wonderful opportunity for a significant stretch of canal to be part of the development of this proposed eastern expansion of Swindon.		Noted.
188	Wilts & Berks Canal Trust	3	The section of the canal would link with the canal as built in Wichelstowe and would add a further 7 miles to our goal of restoring the canal between Semington and Abingdon. The document shows the line of the canal as a green canal corridor; this is a welcome and pleasing result arising from years of meetings and reports between the Trust, SBC and others.		Support noted. In accord with Local Plan policy, development should not compromise the delivery of the canal at the NEV. However, it cannot enforce delivery through the planning process. In the short term, the safeguarded route presents a recreational opportunity for walking, cycling and biodiversity gain.
188	Wilts & Berks Canal Trust	4	The document does not include the requirement for the proposed development to make provision for the funding of the building of the canal or its infrastructure. Our aim is to see the construction of the canal in NEV as an enforceable part of the infrastructure development, and that will mean that the canal must be built as part of any built development.		The Council recognises and welcomes the significant benefits that future delivery of the Wilts & Berks Canal within the NEV would bring for existing and new communities. In accord with Local Plan policy, development should not compromise the delivery of the canal at the NEV. However, the Council cannot enforce delivery through the planning process.
188	Wilts & Berks Canal Trust	5	Submission of Document 1 - WBCT Summary response Submission of Document 2 - WBCT Swindon NEV Non Technical Summary Flood protection Submission of Document 3 - WBCT Swindon NEV Technical Note		Noted.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
206	The Swindon & Oxfordshire Canal	1	<p>Concentrating on the canal route as shown in the Master Plan, WBCT is unable to see how land drainage is adequately dealt with. The impact of the deep bowl* effect on floodwater will restrain these waters, unable to escape from one of the Nation's largest housing developments.*Collecting from the Marlborough Downs, the topography, soil type and geography of the subject area creates the effect of a large water bowl with bottlenecked and limited outflow possibilities. First serious effects of this were witnessed in 2007 when unusually high rainfall closed the A 420 to flooding for a significant period at Acorn Bridge.</p>		Point noted.
206	The Swindon & Oxfordshire Canal	2	<p>BC consultation document on the SUDs raise the issue of long term responsibility and maintenance which it seems SBC will not take on. At least some of this responsibility (i.e. to keep the SuDS and or canal in working order) could be managed by WBCT on a paid basis from the developers.</p>		Point noted.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
206	The Swindon & Oxfordshire Canal	3	<p>Present provisions for “individually-assessed-development-created-water attenuation”</p> <p>(SuDS) relies on the flimsy practice for developers to provide for minimal local flood water attenuation. WBCT can see no provision for collective attenuation</p> <p>and or 100-year flash flood event considerations.</p>		<p>Point noted. A canal can provide some of the main principles of an overall emerging SuDS scheme and it has been recognised in the emerging SuDS Vision SPD that if delivered as part of the development, the canal can be part of the drainage solution for parts of the development, specifically where it passes through the development parcels, and when it can meet the criteria as mentioned above.</p> <p>Therefore we are happy to consider the canal as part of the drainage solution for a development parcel, where it is being proposed by the applicant however, we cannot specify which drainage solutions are used to meet the requirements of an overall SuDS scheme.</p>

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
206	The Swindon & Oxfordshire Canal	4	<p>In providing for local attenuation, present planning law deals with traditional run off volume but it ignores 1) speed of runoff caused by development compared with farmland, 2) flash flooding effects from unstable climate conditions and 3) the aggregate volume of water runoff caused by the several linked developments thereafter. SBC master plan does not consider this critical subject at all. The proposed canal forms a barrier to the run-off from the downs and can divert storm flows to by-pass the Acorn Bridge constriction. Normal canal maintenance would include maintaining cross-drainage structures, which throttle run-off to create the attenuation ponds, and the gravity inflow channels, which divert storm flow into the canal. In this way there will be a reduced reliance on SuDS provided by the developers which can be reduced in size and require less maintenance. SBC propose that each developer will be responsible for providing SuDS to attenuate peak run-off from the impermeable surfaces of their development such that it is the same as that from the original farmland for the 1 in 100-year storm.</p>		Points noted.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
206	The Swindon & Oxfordshire Canal	5	SBC propose that each development will be responsible for providing SuDS to attenuate peak run-off from impermeable surfaces of their development such that it is the same as that from original farmland for the 1 in 100 year storm. This relies on 1) the method of calculating the 1 in 100 year runoff, which will be different for the relatively small development area when compared with the whole River Cole 2) that the SuDS are maintained and 3) that there is adequate capacity over and above the volume of standing water since percolation is slow in clay soils.		Noted.
206	The Swindon & Oxfordshire Canal	6	Size of the SuDS ponds will depend on the estimate of how much stagnant water remains in the ponds following a storm, hence how much attenuation capacity is available for the next storm. The developer will wish to optimize the pond size and this may compromise the efficiency of SuDS.		<p>The Council acknowledge that a canal can provide some of the main principles of an overall SuDS scheme to provide drainage and flood risk benefits and it has been recognised in the emerging SuDS Vision SPD that if delivered as part of the development, the canal can be part of the drainage solution for some areas of the development.</p> <p>Therefore, the Council are willing to consider the canal as part of the drainage solution for a development parcel, where it is being proposed by the applicant however, we cannot specify which drainage solutions are used to meet the requirements of an overall SuDS scheme.</p>

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206	The Swindon & Oxfordshire Canal	6	Size of the SuDS ponds wild depend on the estimate of how much stagnant water remains in the ponds following a storm, hence how much attenuation capacity is available for the next storm. The developer will wish to optimize the pond size and this may compromise the efficiency of SuDS.		Noted.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
206	The Swindon & Oxfordshire Canal	7	<p>Note that the developments are to be built on islands set above the floodplain so as to be above the 1 in 100 flood level in the catchment, but what is this level? The only way to know the flood level is to carry out a holistic hydrodynamic numerical model of the River Cole catchment with and without the NEV to assess the effect of the islands on predicted flood levels and flows. Tagging the canal on to this model will show how the canal forms a flood barrier to protect the NEV. Such a model needs to be instigated by SBC.</p>		<p>The SPD and Masterplan show the main development islands to be outside of the flood zones 2 and 3. There will be a need for strategic infrastructure to be in flood zones 2 and 3 which may need to be above the 1 in 100 year plus climate flood level.</p> <p>The Environment Agency (EA) already have detailed modelling information for the NEV and Flood Zones 2 & 3 are based on these flood modelling extents, Flood Zone 3 being the 1 in 100 year flood extent and Flood Zone 2 being the 1 in 1000 year flood extent. Therefore the existing ground levels on the proposed development Islands are very likely to be above the 1 in 100 plus climate change level.</p> <p>There will be a need for strategic infrastructure to be in flood zones 2 and 3 which may need to be above the 1 in 100 year plus climate flood level. The flood levels, which will vary across the NEV development area, can be obtained from the EA.</p> <p>SBC as the Lead Local Flood Authority (LLFA) are not responsible fluvial flood risk. The management of Fluvial flood risk is under the jurisdiction of the EA. As the canal will be a raised structure in the flood plain the EA would need to consider the feasibility of the canal with regards to flood risk, to ensure it will not increase the flood risk else where as well as it being a flood defence structure. In order for this to be considered in relation to the NEV development proposals, we feel that full plans for the canal will need to be submitted as part of a planning application.</p>

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
206	The Swindon & Oxfordshire Canal	8	Acting as a responsible local stakeholder, WBCT have produced two detailed Technical Notes on the subject: Note 1 (dated March 2016), which deals with Water Management generally and describes how the Wiltshire and Berkshire canal provides flood mitigation and Note 2 (dated April 2016), which describes how the canal can provide a flood barrier to protect the NEV. Both Technical Notes are attached explaining in engineering detail how the canal and its related infrastructure can act as proper conduit for aggregate volume water egress.		Noted.
206	The Swindon & Oxfordshire Canal	9	As demonstrated throughout the UK and Europe, canals add value to residential development, provide for leisure and recreation and public amenity to the localities through which it travels. (https://www.youtube.com/watch?v=dg0B_2v-bLk). It is therefore illogical that SBC has all but ignored the canal within its master plan; to the extent that its planned corridor is marginalised and out of sight and contact with their urban development plans.		The Council recognises and welcomes the significant benefits that future delivery of the Wilts & Berks Canal within the NEV would bring for existing and new communities. In accord with Local Plan policy, development should not compromise the delivery of the canal at the NEV. However, the Council cannot enforce delivery through the planning process.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
206	The Swindon & Oxfordshire Canal	10	The planned layout of the NEV infrastructure as described in the SBC planning reports includes footpaths and cycleways. These can connect with the canal tow path to form a network.		Noted. The details of footpath and cycleways will come forward through the detailed planning application process.
206	The Swindon & Oxfordshire Canal	11	As part of the whole, WBCT master planning has also reviewed the traffic planning and road infrastructure plans proposed as it might affect the development and access to the canal. WBCT consider the fragility of the presently planned road infrastructure makes it unlikely the road network will be able to cope satisfactorily with peak traffic flows from more than presently planned 6,650 new dwellings; it will certainly not support additional recreational and leisure activity as envisaged with the canal in position because there will be public pushback to engagement with the canal leisure offering.		The planned road infrastructure has been designed to cater for the full development, plus natural growth on the network. In this regard, the proposed network is not considered fragile and SBC consider the capacity of this network sufficient to accommodate the extra leisure trips which would also be unlikely to coincide with the natural network peak hours.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
206	The Swindon & Oxfordshire Canal	12	<p>Include: Policy EN6 The risk and impact of flooding will be minimised Swindon Borough will require a considered approach to sustainable drainage from the outset of the proposed development, including drainage management. This will include specialist input from the outset of the design and agreement of eventual ownership and management of the components involved.</p>		Noted.
206	The Swindon & Oxfordshire Canal	13	<p>Policy EN11 with particular reference to: The alignments of the Wilts & Berks Canal and North Wilts Canal, as shown indicatively on the Policies Map, shall be safeguarded with a view to their long term re-establishment as navigable waterways, by... ensuring associated infrastructure of development does not prejudice the delivery of the canal.</p>		Noted.
206	The Swindon & Oxfordshire Canal	14	<p>Lotmead Page 13: Add Local Plan Policy EN11 Page 14/15: Appropriate for onsite contribution for Canal as part of GI. Integration of canal as a part of land drainage could allow construction as part of development 1550 Dwellings</p>		The Council recognises and welcomes the significant benefits that future delivery of the Wilts & Berks Canal within the NEV would bring for existing and new communities. In accord with Local Plan policy, development should not compromise the delivery of the canal at the NEV. However, the Council cannot enforce delivery through the planning process.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
206	The Swindon & Oxfordshire Canal	15	Lower Lotmead Page 17 Add Local Plan Policy EN11 Page 19/20 Appropriate for onsite contribution for Canal as part of GI. Integration of canal as a part of land drainage could allow construction as part of development 800/900 Dwellings		The Council recognises and welcomes the significant benefits that future delivery of the Wilts & Berks Canal within the NEV would bring for existing and new communities. In accord with Local Plan policy, development should not compromise the delivery of the canal at the NEV. However, the Council cannot enforce delivery through the planning process.
206	The Swindon & Oxfordshire Canal	16	Redlands Page 22 Add Local Plan Policy EN11 Page 23/24 Appropriate for onsite contribution for Canal as part of GI. Integration of canal as a part of land drainage could allow construction as part of development 300/400 Dwellings		The Council recognises and welcomes the significant benefits that future delivery of the Wilts & Berks Canal within the NEV would bring for existing and new communities. In accord with Local Plan policy, development should not compromise the delivery of the canal at the NEV. However, the Council cannot enforce delivery through the planning process.
206	The Swindon & Oxfordshire Canal	18	Add Canal to IDP (see table on next page) The existing IDP has £34,429,000 allocated for Major Open Space, £3,320,800 for Local Open Space, and £10,906,000 for a Nature area. Some of this funding is already allocated to providing the green space of the canal line and could be used to construct the canal.		The Council recognises and welcomes the significant benefits that future delivery of the Wilts & Berks Canal within the NEV would bring for existing and new communities. In accord with Local Plan policy, development should not compromise the delivery of the canal at the NEV. However, the Council cannot enforce delivery through the planning process.
206	The Swindon & Oxfordshire Canal	19	Insert an additional infrastructure item - Wilts & Berks Canal - Construction of canal from Commonhead to A420 Acorn Bridge - £35million - shared on and off site - WBCT feasibility Reports		The Council recognises and welcomes the significant benefits that future delivery of the Wilts & Berks Canal within the NEV would bring for existing and new communities. In accord with Local Plan policy, development should not compromise the delivery of the canal at the NEV. However, the Council cannot enforce delivery through the planning process.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
206	The Swindon & Oxfordshire Canal	20	Submission of Document 1 - WBCT Summary response Submission of Document 2 - WBCT Swindon NEV Non Technical Summary Flood protection Submission of Document 3 - WBCT Swindon NEV Technical Note	Noted.	Noted.
207	Wilts & Berks Canal Trust	1	<p>I am delighted to see that the protected canal route has been included in the Consultation for the New Eastern Villages. The construction of the canal must be included as part of the New Eastern Villages infrastructure and like the Wichelstowe development, should be funded by the developers under a Section 106 agreement. The canal offers a wonderful opportunity to give a distinctive character for the New Eastern Villages, will add value to the properties and create both recreational and leisure assets as well as improving people's well-being. The canal will provide opportunities for flood relief and land drainage as well as creating wildlife habitat assets and increased biodiversity.</p> <p>As has already been demonstrated in other parts of the UK and also Europe a water feature such as a canal provides a much needed "green lung" in developed areas and could be the means of giving Swindon a much needed special "wow" factor to be admired on an international scale.</p>		In accord with Local Plan policy, development should not compromise the delivery of the canal at the NEV. However, it cannot enforce delivery through the planning process. In the short term, the safeguarded route presents a recreational opportunity for walking, cycling and biodiversity gain.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
238	Wilts and Berks Canal Trust	1	You are to be congratulated for including the proposed new route of the canal to the east of Swindon in the development plans and I wish my support for this part of the plan to be noted. The canal with its leisure and wildlife possibilities gives a vision of cohesion and connectivity through and around the villages.		Support noted.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
238	Wilts and Berks Canal Trust	2	<p>The policy in each Pro-forma safeguards the route against adverse development and ensures that associated development infrastructure does not prejudice the delivery of the canal. I would suggest however that this should be taken one stage further and that construction of the canal forms part of the delivery requirements for the development i.e. is paid for by the developers, as has been done elsewhere.</p> <p>It surely makes sense to build this in to the plans at the start. It is well demonstrated elsewhere that a working canal creates an increase in property values and I am sure would do so here as well. In addition it should form part of the flood alleviation and field drainage infrastructure of the overall scheme and again it makes sense for the developers to build this into their plans at the outset.</p> <p>The canal is not mentioned separately in the Infrastructure Delivery Plan schedule and I would submit that it should be a separate entry in the green infrastructure section. Why? A green wildlife corridor with bio-diversity snaking through the development with all the additional and various benefits of leisure activities deserves its own section.</p> <p>In conclusion I support the inclusion of the new route through the development</p>		<p>Points noted. In accord with Local Plan policy, development should not compromise the delivery of the canal at the NEV. However, it cannot enforce delivery through the planning process. In the short term, the safeguarded route presents a recreational opportunity for walking, cycling and biodiversity gain.</p>

and the protection of that route, however, I would like to see the building of the canal and infrastructure included with the delivery plan for the developers.

259 Vision for Wroughton

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Please take the chance when building the Eastern Villages to include the chance to reinstate the route of the WILTS AND Berks Canal.
The one at kings hill has brought such a new dimension to wildlife and the countryside, plus wildlife habitat. The canal is still carved into the countryside alongside the A420 and would need little work to bring it back to life and could be paid for by the developer who would gain the benefits of reinstatement a recreational facility. It would also act as a flood relief and drainage.

The Council recognises and welcomes the significant benefits that future delivery of the Wilts & Berks Canal within the NEV would bring for existing and new communities. In accord with Local Plan policy, development should not compromise the delivery of the canal at the NEV. However, the Council cannot enforce delivery through the planning process. In the short term, the safeguarded route presents a recreational opportunity for walking, cycling and biodiversity gain.

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
284	Cotswold Canal Trust	1	<p>I notice that the proposed canal corridor is very different from the old route that the canal took, in particular it is now much further into the flood plain of the stream (I cannot see its name on a map, but it flows under Fox Bridge on the Wanborough road)</p> <p>I suggest that the draft new Eastern Villages Planning Obligations is amended to:</p> <ol style="list-style-type: none"> 1. Require a Section 106 contribution from the developer(s) to the cost of reinstating the canal 2. As a minimum, that: <ol style="list-style-type: none"> A. Sufficient land is allowed in the canal corridor for banks to protect the canal from flooding B. Cognizance of the canal route is taken by developers and their agents when proposing services which cross the line of the canal. This particularly applies to surface water drainage, as the Environment Agency will not usually accept inverted siphons if these became necessary in the future because a poor route was adopted initially. 		<p>In accord with Local Plan policy, development should not compromise the delivery of the canal at the NEV. However, it cannot enforce delivery through the planning process. In the short term, the safeguarded route presents a recreational opportunity for walking, cycling and biodiversity gain.</p>

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285	Foxham & Lyneham branch of the	1	<p>I'd like to add my comments to the consultation for the proposed development at the New Eastern Villages.</p> <p>It's vital to protect the canal route, cul-de-sacs are no use in a canal! The canal should be an integral part of the NEV development and the cost of restoring the canal must be included. It's an incredibly valuable resource for wildlife, for drainage and flood relief, and as a community recreational and leisure asset for the new residents of the villages.</p> <p>It would be a travesty for the new development to exclude full restoration of the canal.</p>		<p>In accord with Local Plan policy, development should not compromise the delivery of the canal at the NEV. However, it cannot enforce delivery through the planning process. In the short term, the safeguarded route presents a recreational opportunity for walking, cycling and biodiversity gain.</p>

Rep no	Organisation	Comment No	Justification	Proposed changes	Officer response
286	Wilts & Berks Canal Trust	1	<p>I must start by welcoming that the plan recognises and preserves the protected canal route for the Wilts & Berks canal.</p> <p>However, given that SBC are members of the Partnership committed to delivering the working end-to-end canal, the SPD presents a whole series of missed opportunities to further that aim.</p> <p>The most fundamental aspect being the missed chance to use this to fund part of the canal build such as was done at Wichelstowe. And following that theme, the water management achieved at Wichelstowe by this approach must surely commend itself to be used at NEV also?</p> <p>As we know, the additional developer costs are largely recovered or offset by the water management that would otherwise have to be built and the increased house sale prices; so with positive and imaginative engineering and commercial discussions, this has to be a feasible approach to take.</p> <p>And this is all without even mentioning the recreational benefits that would accrue, the walking and cycling route, when connected, to Swindon and beyond, ultimately to Bath and Stroud, going West and to Oxford and beyond going East.</p> <p>SBC has signed up to be an active and</p>		<p>Support noted. In accord with Local Plan policy, development should not compromise the delivery of the canal at the NEV. However, it cannot enforce delivery through the planning process. In the short term, the safeguarded route presents a recreational opportunity for walking, cycling and biodiversity gain.</p>

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			supportive member of the Canal Partnership, please now deliver on that commitment and fully realise this opportunity to help deliver an end-to-end working canal.		
323	Canal Ministries	1	<p>What provisions will you make for the 20,000 boats that are full time liveaboards ?</p> <p>How will you liaise with Canal and River Trust who have the responsibility to maintain the canal?</p>		Point noted. The Council continue to work in partnership with the Wilts and Berks Canal Trust.
354	East Challow Parish Council	1	<p>East Challow Parish Council strongly supports the restoration of the Wilts & Berks canal, whose route runs through our village. We are pleased to see that the route to the east of Swindon has been protected from development. We feel strongly that the reconstruction of the canal should be included as part of the infrastructure development of the new Eastern Villages and feel that this should be funded by the developers. As well as offering flood relief and land drainage the canal will make the new eastern village distinctive and therefore very attractive to purchasers. The canal will bring benefits in recreation and leisure and will also go some way to creating wildlife habitats, many of which are being lost due to the level of development in this area.</p>		Point noted. The Council recognise the benefits of the canal at the NEV. In accord with Local Plan policy, development should not compromise the delivery of the canal at the NEV. However, the Council cannot enforce delivery through the planning process.