

NEV Planning Obs Rev dSPD Comments and Responses (Organisations)

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2	Thames Water Ltd (Thames Water)	1		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.		<p>Developers are expected to submit a Wastewater Strategy with a planning application to demonstrate that adequate infrastructure is provided to ensure the development will not impact on any existing infrastructure that would lead to problems for existing users. Thames Water, as they have been on applications already submitted, will continue to be consulted as statutory consultee on any development proposals for the NEV.</p> <p>We are aware that Thames Water are currently drafting a Wastewater Strategy and believe this will highlight any existing capacity issues which will need to be addressed by the developers Wastewater Strategies.</p> <p>We note Thames Waters, Swindon water resources and supply position statement, April 2016 (Re-submitted) Comment reference 2.6.</p>

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2	Thames Water Ltd (Thames Water)	2		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.		<p>Developers are expected to submit a Wastewater Strategy with a planning application to demonstrate that adequate infrastructure is provided to ensure the development will not impact on any existing infrastructure that would lead to problems for existing users. Thames Water, as they have been on applications already submitted, will continue to be consulted as statutory consultee on any development proposals for the NEV.</p> <p>We are aware that Thames Water are currently drafting a Wastewater Strategy and believe this will highlight any existing capacity issues which will need to be addressed by the developers Wastewater Strategies.</p> <p>We note Thames Waters, Swindon water resources and supply position statement, April 2016 (Re-submitted) Comment reference 2.6.</p>

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2	Thames Water Ltd (Thames Water)	3		It is Thames Water's understanding that Section 106 Agreements can not be required to be used to secure water and waste water infrastructure upgrades. However, it is essential to ensure that such infrastructure is in place to avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property, pollution of land and watercourses plus water shortages with associated low pressure water supply problems.		<p>Developers are expected to submit a Wastewater Strategy with a planning application to demonstrate that adequate infrastructure is provided to ensure the development will not impact on any existing infrastructure that would lead to problems for existing users. Thames Water, as they have been on applications already submitted, will continue to be consulted as statutory consultee on any development proposals for the NEV.</p> <p>We are aware that Thames Water are currently drafting a Wastewater Strategy and believe this will highlight any existing capacity issues which will need to be addressed by the developers Wastewater Strategies.</p> <p>We note Thames Water's, Swindon water resources and supply position statement, April 2016 (Re-submitted) Comment reference 2.6. Development proposals will be assessed in accordance with adopted Local Plan policy IN2.</p>

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2	Thames Water Ltd (Thames Water)	4		Water and sewerage undertakers also have limited powers under the water industry act to prevent connection ahead of infrastructure upgrades and therefore rely heavily on the planning system to ensure infrastructure is provided ahead of development either through phasing and Local Plan policies or the use of conditions attached to planning permissions.		Development proposals will be assessed in accordance with adopted Local Plan policy IN2.
2	Thames Water Ltd (Thames Water)	5		<p>Thames Water therefore consider that the following section should also be added to the SPD:</p> <p>Wastewater/Sewerage and Water Supply Infrastructure Developers will be required to demonstrate that there is adequate water supply, waste water capacity and surface water drainage both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing water and/or waste water infrastructure. Drainage on the site must maintain separation of foul and surface flows. Where there is an infrastructure capacity constraint the Council will require the developer to set out what appropriate improvements are required and how they will be delivered.</p>		The Council must ensure that new development in the NEV can provide adequate infrastructure (Wastewater and Water Supply) to ensure it will not impact on any existing infrastructure that would lead to problems for existing users or that the development is not carried out until Thames Water have provided the necessary strategic infrastructure as planned.

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2	Thames Water Ltd (Thames Water)	6		Swindon water resources and supply position statement, April 2016 (Re-submitted)		Noted.
10	Swindon Bicycle Users Group	1		We note that extra 'footways / cycleways' have been added to the Plan: this is welcomed. In particular, we welcome the extra crossings shown for the railway and A420. However, the Plan remains difficult to interpret as it is clear that not all of the red dotted lines refer to cycleways (see Fig 1): and so we don't know how many of them are intended to be cycleways.		Support noted. Further consultation will be undertaken at the detailed planning stage to determine detailed network to be enjoyed by cyclists.
10	Swindon Bicycle Users Group	2		The extra crossings shown for the railway and A420 should be provision for cyclists AND walkers. Consideration should be given to adding a safe A420 crossing point at the Carpenter's Arms junction;		Noted. The planned strategy is for most routes to be joint use for walkers and cyclists. New FP 5 bridge across railway is to be designed with ability to provide cycle ramps as development progresses.
10	Swindon Bicycle Users Group	3		The majority of the 'footway / cycleways' shown on the plan should be provision for cyclists AND walkers - see, for example, Figure 2;		Noted. The planned strategy is for most routes to be joint use for walkers and cyclists. New FP 5 bridge across railway is to be designed with ability to provide cycle ramps as development progresses.

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10	Swindon Bicycle Users Group	4		That this provision would be in addition to the requirement in the draft village proformas that developers provide a walking and cycle network that integrates with existing networks and provides good connectivity within the development and to the surrounding area (BUG emphasis)		Noted and agreed. Key strategic routes will be provided with joint footpath/cycleway path provision, where appropriate.
10	Swindon Bicycle Users Group	5		That this would include cycle access to all of the schools, including the ones which don't have red dotted lines near them.		Safe routes to schools will form a key part of the Council's planning strategy and will be developed in detail at subsequent design stage(s).
10	Swindon Bicycle Users Group	6		That the roads indicated on the plan should include segregated cycleway provision (see Fig. 2). This would then, for example, provide cycle access to the White Hart Junction and Great Stall Bridge as we believe is intended;		Noted and agreed in principle (either as separate cycleway or as joint use footpath-cycleway paths). Further consultation will be undertaken through detailed delivery to provide a balance of routes for all users.
10	Swindon Bicycle Users Group	7		It would also help ensure that (a choice of) cycle routes are overlooked: this is needed to develop feelings of security.		Agreed. Such detailing will be included and consulted upon through the detailed delivery, and at the design Coding/reserved matters stage(s).
10	Swindon Bicycle Users Group	8		That it would be helpful to develop a draft plan of the actual cycle network envisaged, to provide clarity for parties. BUG is happy to help develop this.		This is the Council's intention and BUG are invited to assist in its preparation along with other stakeholders.

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10	Swindon Bicycle Users Group	9		New link across the railway at footpath 5. We notice that the wording has been changed in the several references to this. It remains our view that this bridge should carry a footpath AND a cycle path.		Point noted. The new link will provide a footpath and a cycle path in line with new development.
10	Swindon Bicycle Users Group	10		Wanborough Road. We note that selected developers are now required to provide cycleway facilities along Wanborough Road. We support this, and would be pleased to help develop or comment on proposed designs at a later stage.		Support noted.
10	Swindon Bicycle Users Group	11		5. It is only for Lotmead and Redlands that developers are required to "Contribution [to] works [at] 1. Kingfisher Drive/Merlin Way 2. Covingham Drive/Merlin Way 3. Merlin Way/A420 Slips (as required through phasing prior to White Hart Works) 4. Kingfisher drive/Dorcan Way 5. Greenbridge Road/Dorcan Way". This may be an editorial error: we believe that all developers should be required to make such		Noted. For consistency the village proformas have been reviewed to reflect this requirement.
10	Swindon Bicycle Users Group	12	13	Table 1 on p13 does not contain all of the items listed in the shared infrastructure needs in the Village Proformas: for example, it misses out Junction 15 Improvements, and Contributions to linkages between development islands. It's rather confusing to have two different lists!		Highway links between the development islands is listed in Table 1. Junction 15 improvements are not included in the list as this is to be informed by the Council's final agreement in respect of the contribution arising from the Commonhead development.

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11	Ainscough Strategic Land	1		The document sets out the preference to pursue a Framework S106 Agreement for the NEV which seeks the equitable distribution of infrastructure costs. However, there is limited detail in respect of this approach and also an acknowledgement at paragraph 4.2 that there are a number of planning applications already under consideration and it is considered that further information in respect of a Framework Agreement needs to be provided.		Noted.
11	Ainscough Strategic Land	2		It should be noted that ASL have significant doubt as to whether a Framework S106 Agreement can be achieved at the New Eastern Villages, and are concerned the time required to pursue such an agreement will have a negative impact on delivery timescales for the allocated development.		The Council consider that in the interests of achieving comprehensive delivery of the NEV and 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.

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11	Ainscough Strategic Land	3		Notwithstanding this, the document does make provision for the strategic development to come forward on the basis of separate planning applications, as being progressed in practice currently which is welcomed. This flexibility is considered appropriate given the potential complexities of planning permissions being predicated on a s106 Framework which would need to be agreed with numerous landowners and developers.		Noted.
11	Ainscough Strategic Land	4		ASL support the recognition that the development should be delivered in broad accordance with the Illustrative Masterplan. This will enable flexibility in the practical application of the Masterplan and should not be viewed as overly prescriptive. This has been considered further, below.		Noted. The accompanying SPD narrative requires development to be carried out in broad accordance with the Masterplan.
11	Ainscough Strategic Land	5		It is recognised that there have been some positive amendments in the latest iteration of the illustrative Masterplan. It is also noted that the Revised Draft SPD recognises the Masterplan as illustrative setting out the broad principles of development, rather than prescriptive detail.		Noted. The accompanying SPD narrative requires development to be carried out in broad accordance with the Masterplan.

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11	Ainscough Strategic Land	6		<p>Housing to west of Wanborough Road access:</p> <p>The inclusion of residential development to the west of the existing access from Wanborough Road to Lotmead Village is welcomed and considered more in tune with the illustrative Masterplan submitted as part of the outline planning applications. Whilst there remains a discrepancy in the extent of the area identified, the principle is recognised as appropriate.</p>		Noted.

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11	Ainscough Strategic Land	7		<p>Primary School Provision:</p> <p>Concerns remain over the distribution of primary schools with provision included for a school at both Lotmead and Lower Lotmead villages. This issue is considered in more detail below in conjunction with the Village Proformas. In brief, the current spatial strategy of primary school distribution as set out on the illustrative Masterplan is not supported by the necessary evidence. It is also inconsistent with evidence presented by ASL in respect of the outline planning applications. As set out, such an approach cannot be currently justified and would be inconsistent with the statutory tests set out at CIL Reg 122, insofar as it would not be necessary or reasonably related to the development proposed.</p>		<p>The Council's evidence base in relation to school place need justifies two school sites. The Masterplan therefore indicates two sites in a spatially logical arrangement. Based on the calculation of pupil yield as set out in the School Place Planning Study, a scheme of 2,600 dwellings would require 3FE primary school places with land provision to permit future expansion.</p> <p>The application proposals show two development "islands" in accordance with the indicative Masterplan as shown in figure 11 of the SBLP. It is estimated that the eastern island (Lower Earls court or Lower Lotmead) could provide about 900 dwellings whilst the western island (Earls court or Lotmead) could provide about 1,700 dwellings. This would be subject to final details.</p> <p>In order to provide for primary education need generated by this application, and to accord with the adopted local plan and the requirements of the comprehensive NEV allocation, an appropriate solution would be to provide two 2FE primary schools with 26 part time place nursery with one school located at Lotmead and one school located</p>

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						<p>at Lower Lotmead. Therefore two school sites would be required. This would cater for the demographic peak of the development.</p> <p>Whilst the provision of a single 3FE school could meet the requirement, such a provision would not be the preferred solution and two sites for two 2FE schools has been requested as outlined above.</p>
11	Ainscough Strategic Land	8		<p>Position of the Sothern Connector Road (SCR):</p> <p>The indicative route of the SCR remains unchanged and is inconsistent with the illustrative Masterplan prepared by ASL in respect of the outline planning applications, albeit it is not considered the differences are substantive. Whilst the general objective of the SCR is appropriate, the Illustrative Masterplan should be amended to reflect the route shown on the ASL Masterplan submitted in May 2015 following extensive pre application discussion with Swindon Borough Council officers.</p>		<p>Noted. No revision considered necessary as detailed alignment will be resolved at reserved matters stage.</p>

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11	Ainscough Strategic Land	9		The primary education strategy set out on the Revised Draft Illustrative Masterplan and within the individual Village Proformas is neither justified in respect of the overall number of forms of entry sought nor the spatial distribution of those schools. There is currently an overly concentrated provision of two schools in close proximity at Lotmead and Lower Lotmead Villages, whereas provision of land only in other localities will result in an absence of provision in village communities elsewhere.		The number of forms of entry and the spatial distribution of schools sought within the Masterplan is justified. As stated above the requirement for 6 x 2FE primary schools is calculated using the published methodology within the School Place Planning Study and are located as centrally as possible to enable access to primary schools fall within the 2 and 3 mile travelling distances.
11	Ainscough Strategic Land	10		The approach and extent of green infrastructure provision sought across the NEV is considered appropriate and an important part of delivering high quality and sustainable new communities. ASL has promoted the incorporation of a substantial area of open space and green infrastructure at the Lotmead Villages.		Noted.

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11	Ainscough Strategic Land	11		<p>However, the exclusion of land required 'to preserve Schedule Monuments and other nationally/regionally important undesignated archaeological sites and their settings in situ' from open space calculations is inappropriate and should be amended. The exclusion of such areas is inconsistent with the NPPF and, whilst it is recognised that such areas should be preserved, this can readily be done with public access in conjunction with appropriate management. The NPPF identifies at paragraph 126 that 'Local Planning Authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment (my emphasis)'. In so doing, they should take into account the 'wider social, cultural, economic and environmental benefits of conservation'. The incorporation of land around the SAM as open space provides the potential to offer a range of social and cultural benefits for future residents and visitors alike in better revealing the heritage asset. It is therefore appropriate to amend the Proforma accordingly.</p>		<p>As stated in the village proformas, land required in order to preserve Scheduled Monuments and other nationally/regionally important undesignated archaeological sites and their settings in situ should not be accounted for as public open space. Public open space should be provided in accordance with the typologies and standards as set out in Policy EN3 of the Local Plan.</p>

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11	Ainscough Strategic Land	12		Representations submitted in May 2016 in respect of the Draft IDP raised concern over how the funding will be apportioned to specific infrastructure items. Whilst it remains that a number of sources have been identified for the funding arrangements of infrastructure, including: developer/s106 and Local Growth Fund, it remains unclear how this would operate in practice.		Point noted, the SPD will be reviewed to make clear the relationship between infrastructure and potential funding arrangements.
11	Ainscough Strategic Land	12		There have been significant increases in the cost of a number of infrastructure items since the previous iteration of the IDP. This could give rise to pressures on the viability of the development. Similarly, the contribution of external sources of funding for major infrastructure elements remains unclear and, in accordance with point 1 above, further information is sought. Notably, the delivery of the SCR is not currently identified for delivery in conjunction with the Local Growth Fund. It is recommended that the IDP is accompanied by an updated Viability Appraisal to cover the NEV area in general.		The SPD seeks to ensure that contributions are secure without undermining the viability and deliverability of the schemes.

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11	Ainscough Strategic Land	13		Helpfully, an example is provided to demonstrate IDP Cost Apportionment in the case where separate applications come forward. However, it is requested that further information is provided to demonstrate the example in more detail. It lacks clarity at present.		SBC will review the apportionment calculation and example.
12	Barberry (Swindon) Ltd	1		Potential capacity to deliver 575 units at Redlands		Noted.
12	Barberry (Swindon) Ltd	2		Imposition of BREEAM standard on proposed village shop and 2FE School would impact upon viability.		There is a policy requirement for non residential development to meet BREEAM Excellent standard.
12	Barberry (Swindon) Ltd	3		We do not consider that there is a need for traffic calming measures to be taken in villages other than Wanborough.		<p>Traffic calming and management schemes are required to minimise "rat-running through existing adjacent villages and east Swindon"; as set out in Policy NC3 of the adopted Local Plan. The existing villages include Wanborough, but are not exclusive to Wanborough.</p> <p>The traffic calming/management scheme is required to address areas further afield than Wanborough, in order to reduce the attractiveness for traffic routing to Junction 14 of the M4 via the villages and as such limited application traffic calming to Wanborough would not materially affect this lengthy route choice.</p>

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12	Barberry (Swindon) Ltd	4		No justification for a community hub		In order to deliver sustainable development at the NEV and in accord with policy, developers will be expected to provide community hub provision. Provision secured will be negotiated through the development management process.
12	Barberry (Swindon) Ltd	5		No evidence that there is archaeology at the site.		The SPD is intended to provide further explanation of policies on the Adopted Local Plan. Delivery of development will be informed by detailed site investigations through the development management process. Such detailed matters are subject to the formal arrangements and procedures at planning application stage.

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12	Barberry (Swindon) Ltd	6		<p>Redlands VP</p> <p>Consider that the GP facility should be provided by the private sector. Local health provision unsure what this refers to if GP facility will be provided.</p> <p>No justification for Adult Social Care.</p> <p>No capital project identified for delivery of library provision.</p> <p>No justification for Great Western Community Forest if providing onsite open space and landscaping.</p> <p>Sports facilities to be analysed and costed before contributions agreed.</p> <p>No evidence for the archaeology / storage solutions</p> <p>No impact to require public art contribution</p> <p>No flood mitigation or SUDs required at Redlands</p> <p>Strongly object to District Housing Network.</p>		The items identified in the IDP are critical to achieving sustainable development at the NEV. Further explanation is provided in the IDP.
12	Barberry (Swindon) Ltd	7		<p>Consider that there are certain items in the IDP that are not necessary and would not meet the CIL tests (203/205 of the framework).</p>		The items identified in the IDP are critical to achieving sustainable development at the NEV. The SPD has been prepared in accord with the CIL Regs as clearly stated in Section 2 of the SPD.

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12	Barberry (Swindon) Ltd	8		The SPD does not make it clear that significant elements of the transport infrastructure are to be funded by Central Govt.		<p>Paragraph 3.5 of the SPD clarifies this point, as stated below:</p> <p>Where funding is to be provided by external bodies for the provision of infrastructure, there will be a provision in the legal agreement between the Council and the landowner/developer providing a mechanism to off-set or pay back the correct proportion of the contribution paid by the landowner/developer towards the same infrastructure as appropriate. It may not be possible to assess this until all the relevant infrastructure has been delivered and comprehensive final costs of delivery are known.</p> <p>Where forward funding has taken place in order to ensure the early provision of infrastructure, the Council will secure section 106 contributions retrospectively with the grant of planning permissions post-dating the provision of such infrastructure so as to reimburse the forward funder(s) of the infrastructure.</p>

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12	Barberry (Swindon) Ltd	9		<p>It would be useful if this paragraph referred to the need to ensure that any request for infrastructure provision complies with the tests set out in the CIL Regs and paras 203 to 205 of the Framework.</p> <p>It is not clear at this stage whether all infrastructure items will meet the Reg 122 / Framework 204 tests.</p>	Para 2.2 and 2.3 should be amended to reflect this.	Section 2 of the SPD clearly sets out the statutory and planning policy context.
12	Barberry (Swindon) Ltd	11		<p>Council will fall foul of pooling restrictions.</p>		<p>As stated in paragraph 2.4 of the SPD, 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. In line with the comprehensive approach required by policy as far as development in the NEV is concerned, 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.</p>

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12	Barberry (Swindon) Ltd	12		May not be appropriate or feasible to achieve a framework S106 agreement.		As stated in the SPD (para 2.10), the Council will seek to reach agreement with all parties that have controlling interest in the land at the NEV through a Framework S106 agreement.
12	Barberry (Swindon) Ltd	13		SPD documents should "not be used to add unnecessarily to the financial burdens on development" (para 153 of the Framework)		Noted. The purpose of the SPD is to provide a clear and transparent approach as to how the Council will seek to secure a Framework S106 Agreement to secure the necessary planning obligations to deliver the infrastructure required to achieve sustainable development at the NEV in accordance with the Local Plan.
12	Barberry (Swindon) Ltd	14		Tariff style Section 106 agreement does not allow the pooling of contributions for more than five schemes.		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.
12	Barberry (Swindon) Ltd	15		Suggest the following text as consider it may be necessary for the Council to step in to secure access over the third party land.	"Where necessary, the council will use its compulsory purchase powers to secure access and the delivery of any necessary infrastructure to link development areas throughout the NEV".	At para. 3.7, the SPD states when the Council would use its compulsory acquisition powers.

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12	Barberry (Swindon) Ltd	16		It is unlikely that landowners and developers will agree an equalisation procedure amongst themselves. Therefore, it will necessary for developers to agree such a process with the Council whereby 'Credits' are identified for the provision of land for infrastructure items. The agreed value of such land can be used to off-set other contributions to ensure that individual developers are not unfairly burdened by financial requirements and loss of land for the overall NEV project.	Suggest text, please see original representation.	Point noted. The purpose of the SPD is to provide a clear and transparent approach as to how the Council will seek to secure a Framework S106 Agreement to secure the necessary planning obligations to deliver the infrastructure required to achieve sustainable development at the NEV on a fair and equitable basis.
12	Barberry (Swindon) Ltd	17		Concerned that the external funding is not yet in place and will cause cash flow problems for the early phases of development.		Land value, where appropriate will be considered as part of detailed S106 negotiations during the development management process.
12	Barberry (Swindon) Ltd	18		Fourth bullet point under item a) should be removed. It is not possible to secure third party access rights.		The SPD seeks to ensure access across land within the NEV to facilitate the delivery of infrastructure. Where necessary and where it is satisfied that other reasonable avenues have been exhausted, the Council will use its compulsory acquisition powers to acquire land that is required for the timely delivery of necessary infrastructure and/or to unlock development parcels.

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12	Barberry (Swindon) Ltd	19		Many of the items in Table 1 are "wish" items but affect the viability of the project.		The items identified in the IDP are critical to achieving sustainable development at the NEV. Further explanation and supporting text is provided in the final version of the IDP.
12	Barberry (Swindon) Ltd	20		It must be recognised that the items impose a further physical financial cost to each development and this will need to be considered against the overall viability of the NEV.		Noted. The Council has undertaken a number of viability assessments during preparation of the local Plan to support delivery of the NEV. The infrastructure identified is necessary to deliver comprehensive development at the NEV. Section 4 of the SPD provides more information on viability.
12	Barberry (Swindon) Ltd	21		It will necessary for development to raise capital receipts by the sale of a certain amount of housing before infrastructure items can be paid for. This will need to be taken into account when assessing scheme viability.		Noted.
12	Barberry (Swindon) Ltd	22		The system identified by the Council will add further to the costs of implementation of development and this will need to be factored in viability assessments. This should be referred to in the text.		Noted. The purpose of the SPD is to ensure the infrastructure required to deliver sustainable development at the NEV can be achieved.

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12	Barberry (Swindon) Ltd	23		Disagree that the current level of infrastructure requirements is financially viable. Suggest wording which should state that should viability becomes a barrier to development, the Council will negotiate an appropriate S106 package.		The SPD seeks to ensure that contributions are secure without undermining the viability and deliverability of the schemes.
12	Barberry (Swindon) Ltd	24		Detailed comments submitted on some of the infrastructure items set out in the IDP. Please refer to original representation.		The items identified in the IDP are critical to achieving sustainable development at the NEV.
13	Hannick Home and the Peploe Trus	1		Hannick Homes and Peploe Trust have reached agreement and are acting with a common purpose to bring forward land within the NEV, specifically the Green Land and Peploe Land, which together comprise a substantial part of Lotmead Village to the east and Foxbridge Village to the west.		Point noted.
13	Hannick Home and the Peploe Trus	2		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.		Point noted, the village proformas seek to provide a framework to inform what should be provided and is consistent with Policy and the requirements set out in the IDP.

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13	Hannick Home and the Peploe Trus	4		We also acknowledge and support the in realignment (in-part) of the Southern Connector Road (south of Wanborough Road) within Peploe Trust Land. However, insofar the alignment north of the Wanborough Road, as currently proposed, there is no certainty of provision of such a route in the location.		<p>The LPA acknowledges the positive response from Hannick/Peploe (H/P) in co-operating to deliver the SCR and associated development at an early stage.</p> <p>Unknown constraints prevent the development of a fixed SCR route at this stage and hence the alignment on the Masterplan is considered indicative only. All affected landowners will be engaged as the alignment becomes more fixed and access arrangements to land will be considered at that stage.</p>
13	Hannick Home and the Peploe Trus	5		As stated, the agreement reached between Hannick Homes and Peploe Trust demonstrates a significant opportunity to deliver a larger part of that connector route which will serve to link the villages to the north and south of the Wanborough Road and to help facilitate onward connectivity to Junction 15 of the M4. The Peploe/Green proposed amendments to the Masterplan that support these representations show how this could be achieved holistically.		<p>The LPA acknowledges the positive response from Hannick/Peploe (H/P) in co-operating to deliver the SCR and associated development at an early stage.</p> <p>Unknown constraints prevent the development of a fixed SCR route at this stage and hence the alignment on the Masterplan is considered indicative only. All affected landowners will be engaged as the alignment becomes more fixed and access arrangements to land will be considered at that stage.</p>

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13	Hannick Home and the Peploe Trus	6		It is understood that further consideration of archaeological interests is required in relation to development at the northern edge of Foxbridge Village, which could influence the alignment of the SCR, but critically, our proposals present a real opportunity to deliver a significant part of the SCR wholly within Peploe and Green Land and consequently, this option should be identified on the Masterplan, with context expanded upon as necessary within the 'Transport and Movement' section of the Draft Village Proformas, so as to ensure that this opportunity for delivering a key piece of strategic infrastructure is appropriately identified within the document as an option for delivery.		Noted. The precise position of SCR, as it crosses Wanborough Road, will be dependent on more detailed investigation of constraints (archaeology/heritage assets). County Archaeologist advice, subject to further on-site investigation, is that archaeological assets are likely to mitigate against SCR alignment north of location indicatively shown on the Masterplan.
13	Hannick Home and the Peploe Trus	7		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, its delivery 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 moreover, further development parcels within the central portion of the NEV allocation.		Noted.

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13	Hannick Home and the Peploe Trus	8		Our submission plan also illustrates an alternative access option, comprising two right turn junctions off Wanborough Road. The location of the southern access is consistent with that now shown on the NEV Illustrative Masterplan (July). The northern access presented by our proposals demonstrates a deliverable option that could adequately serve the quantum of development proposed on the Green and Peploe land, in the event that the roundabout scenario is not progressed.		Noted.
13	Hannick Home and the Peploe Trus	9		We also comment that the July Illustrative Masterplan has, in certain locations, reduced development parcels across the NEV more generally. We therefore reiterate the opportunity for both Green and Peploe land to accommodate additional development from that indicatively shown in the July 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.		The extent of development will be determined through the planning application process.

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13	Hannick Home and the Peploe Trus	10		Indicative development parcels are shown on our submitted Masterplan. On the Green Land, north of the Wanborough Road, there is an opportunity to secure additional development land through an approach that seeks the restoration of the flood plain to the Liden Brook. Our submitted Masterplan also illustrates how, albeit indicatively, a connected cycle/rights of way network can still be provided together with sufficient green infrastructure that serve to reinforce distinction between villages.		Noted.
13	Hannick Home and the Peploe Trus	11		Additional development can also be delivered on the Peploe Land, south of Wanborough Road, which supports the indicative pattern of development within Foxbridge Village as currently shown, and highlights further unconstrained areas with development potential.		Noted and accepted in principle subject to further site investigation and refinement of Masterplan proposals at detailed planning stage(s), including assessment and planning of detailed open space requirements in accordance with SBLP 2026.
13	Hannick Home and the Peploe Trus	12		We continue to progress with more detailed design and masterplanning work across the Peploe and Green Land, to further refine development proposals. Noting the approach set out at para 5.5 of the draft SPD that confirms the role that NEV land promoters have to play in refining the draft NEV Masterplan, we request that our comments are taken on board in successive iterations of both the Masterplan, and Draft Village Proformas.		It is anticipated that the SPD will be programmed for adoption in October 2016. The Masterplan will be a material consideration in the determination of planning applications. Individual village development proposals must be in broad accordance with it but fine-tuning of land allocations and masterplanning detail will be acceptable, in principle, subject to justification and formal approval by the LPA.

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14	Capital Land Property Group Ltd an	1		The Swindon New Eastern Villages Draft Planning Obligations SPD and supporting documentation propose a framework S106 mechanism that fails the legal requirements for planning obligations;		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.
14	Capital Land Property Group Ltd an	2		The evidence base is not up to date;		All infrastructure items are evidence based and justified as set out in the IDP.
14	Capital Land Property Group Ltd an	3		The mechanisms are too prescriptive and therefore fail the test of the NPPF.		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.
14	Capital Land Property Group Ltd an	4		The result is that there will be significant delays in the development at the NEV coming forward.		The approach detailed within the SPD seeks to ensure the right infrastructure is delivered in the right place, at the right time.
14	Capital Land Property Group Ltd an	5		Capital Land notes that the revised draft SPD includes two new sections dealing with the Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) and economic viability, respectively, with the former repeating paragraph 2.23 of the previous SPD which states that SA and SEA are not necessary as they were produce for the Local Plan.		The section makes it clear that SEA is not necessary for the SPD.

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14	Capital Land Property Group Ltd an	6		Capital Land is concerned with the section dealing with Economic Viability. This states that the infrastructure requirements for the NEV identified within Local Plan have been subject to an independent Financial Viability Assessment that demonstrates that the NEV is deliverable and therefore the viability of individual applications is not expected to be challenged on principle. That Financial Viability Assessment is not available as part of the evidence base to support the SPD and therefore, its assumptions and currency cannot be challenged through this consultation process. This is a failure in transparency which could be significantly prejudicial to emerging development proposals at the NEV.		Section 4, which covers viability has been updated in the SPD.
14	Capital Land Property Group Ltd an	6		Capital Land notes that the revised draft SPD includes two new sections dealing with the Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) and economic viability, respectively, with the former repeating paragraph 2.23 of the previous SPD which states that SA and SEA are not necessary as they were produce for the Local Plan.		This is a matter of clarity for the SPD.

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14	Capital Land Property Group Ltd an	7		Paragraph 2.4 of the SPD notes the pooling restriction applied by Regulation 123 of the CIL Regulations which prevents contributions being sought from more than five S106 obligations towards any single piece of infrastructure. Given that it is highly likely that the development of the NEV will come forward through more than five planning applications, this is a concern to Capital Land particularly given the level of infrastructure that is proposed for Great Stall East.		As stated in paragraph 2.4 of the SPD, 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. In line with the comprehensive approach required by policy as far as development in the NEV is concerned, 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.

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14	Capital Land Property Group Ltd an	8		<p>Whilst Capital Land welcomes and supports the mechanisms set out at paragraph 4.5 with regard to equalising shared on site infrastructure costs such as school sites there is still concern over how this will be implemented particularly in relation to Regulation 123 issues and lack of an overall developer consortium. If, for example, a sixth or seventh planning application was made to deliver elements of the NEV which are not currently controlled by the development industry, it is clear that a proportional contribution to a planning obligation would not meet the Regulation 123 tests and would not be legal. Therefore landowners that are contributing land for shared infrastructure need to be assured that the value of the land will be secured.</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>
14	Capital Land Property Group Ltd an	9		<p>Capital Land welcomes the updates to the village Proformas and IDP and notes that the dwelling capacity of the identified villages is between 8,000 and 8,200 dwellings in line with Local Plan Policy NC3 which identifies the NEV as delivering some 8,000 dwellings by 2026. However this does not reflect the reality of the planning process as it stands.</p>		<p>Noted.</p>

14	Capital Land Property Group Ltd an	10	<p>To date, no planning applications for residential development have been permitted. Two applications are awaiting determination (South Marston Expansion and Rowborough and Redlands villages) and the applications dealing with Lotmead Village and Lower Lotmead Village are the subject of planning appeal. These application sites have a dwelling capacity of some 5,350 dwellings.</p> <p>There is no developer control for Upper Lotmead, Great Stall West or Foxbridge villages and these are expected to contribute 2,450 dwellings in the plan period. Therefore the delivery of this level of development at the NEV efficient use of land which is in the control of the development industry.</p> <p>A planning application for Great Stall East is being prepared for submission by Capital Land in early 2017. Given the above, and as part of the application preparation process, Capital Land believes that through efficient land use and minor changes to the Masterplan Great Stall East has potential to deliver:</p> <ul style="list-style-type: none"> ☐ over 1,900 dwellings at 40 dwellings to hectare; ☐ a minimum 10 FE Secondary School, 16-18 education and 2FE Primary School; 		Noted.
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				<ul style="list-style-type: none"> ☐ Park and Ride site; ☐ Local centre; ☐ Principal Road Network; ☐ Sports hub; and ☐ Open space to SBC requirements. <p>The details of how this can be achieved as set out in the following section dealing with the Revised Draft Masterplan..</p>		
14	Capital Land Property Group Ltd an	11		<p>This level of development at Great Stall East together with development within current planning applications, therefore has the capacity to deliver well in excess of 7,000 dwellings in the Plan period and thereby avoid the issues of the late delivery of Upper Lotmead, Great Stall West and Foxbridge villages, which seems likely. Therefore, the Proforma for Great Stall East should be amended to include around 1,900 dwellings rather than the 1,100 currently identified.</p>		<p>The number of dwellings will be determined through the detailed planning application stage and assessed against the adopted Swindon Borough Local Plan.</p>
14	Capital Land Property Group Ltd an	12		<p>Capital Land is concerned that the sources of information to corroborate the Revised Infrastructure Delivery Plan update have not been published and therefore cannot be verified.</p>		<p>All infrastructure items are evidence based and justified as set out in the IDP.</p>

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14	Capital Land Property Group Ltd an	13		Capital Land notes that 'Proposals for development must be in broad accordance with the Illustrative Masterplan'. Capital Land, as part of the process of preparing a planning application, has considered the efficient use of land to accommodate the level of development and, more importantly for the reasons set out above, whether that can be increased.		The LPA welcomes Capital Land's agreement to enter formal Pre-Application discussions. It is, however, concerned that Capital Land's formally submitted draft Masterplan changes do not reflect some of the positive design aspects discussed as part of initial LPA/developer meetings. Evidence, through the formal pre-application process, will need to justify Capital Land's proposed housing quantum and a number of the spatial/design aspects of its proposals. There is concern that development is proposed (including school playing fields) in flood zone 2 without evidence that this is a) acceptable to the EA and b) feasible in terms of providing playing fields that can be used throughout the year. No amendments are therefore recommended/made to the Masterplan.

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14	Capital Land Property Group Ltd an	14		Capital Land has liaised with SBC and other key stakeholders such as Stagecoach and the Environment Agency. This has resulted in reductions to the area of land in Flood Zone 2 and a 50% reduction in the area required for the Park and Ride facility. Similarly, consideration has been given to the use of land for the enlarged secondary school. In particular, the use of Flood Zone 2 for open space and playing fields which are less vulnerable uses and the Council's recent acceptance of such uses in Flood Zone 2. Provision of all-weather pitch also reduces the area required for sports pitches and shared use facilities. By relocating the education provision and local centre further to the south and east and the park and ride further west it is possible to create a hub of activity and complementary uses in one location adjoining the River Cole corridor and a north south corridor of open space.		This proposal has not been evidenced or confirmed by the Environment Agency to be acceptable. For strategic transport reasons the LHA recommends that the P&R site is located closer to the NEV eastern access. No change is made to the P&R site location.
14	Capital Land Property Group Ltd an	15		In addition, the buffer adjoining Great Stall Middle (The Hub) can be replaced with residential development as noise issues can be mitigated by landscape design and conditions.		Detailed mitigation measures will be considered at the detailed planning application stage and determined in accordance with the adopted Swindon Borough Local Plan.

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14	Capital Land Property Group Ltd an	16		The net results of these changes is to increase the developable area to accommodate around 1,900 dwellings at 40 DPH. The alterations to the Masterplan recommended by Capital Land are attached.		The number of homes will be determined through the detailed planning application stage and assessed against the adopted Swindon Borough Local Plan.
14	Capital Land Property Group Ltd an	17		It is proposed to move the secondary and primary school sites further east for site planning reasons (and because noise impacts from the Hub employment site can be resolved through house type design /landscape design measures).		In principle this localised spatial redistribution of land uses is acceptable and would be considered, subject to detailing, to be in broad accordance with the Masterplan. This matter will be subject to consideration through the ongoing Development Management process.
14	Capital Land Property Group Ltd an	19		Vehicular access proposed to connect Great Stall East with A420 east of the "Hub" Employment site, in addition to the eastern point of access.		There is no evidence to justify the need for this access or to demonstrate its acceptability as an additional highway intervention on the A420.
15	DV4 Properties Swindon Co. Ltd (D	1		In respect of the of the inclusion of the area of land immediately west of the new access being formed to serve Symmetry Park, known as Area C, as part of the District Centre and being suitable for such uses this change is appreciated and supported. Access to this parcel of land has been approved as part of the Reserved Matters approval for the outline consent and the Illustrative Masterplan designation will facilitate a suitable district centre use coming forward to enhance this entrance to the NEV and Symmetry Park.		This inclusion reflects the detail submitted with DB Symmetry's recently approved outline planning permission.

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15	DV4 Properties Swindon Co. Ltd (D	2		It is acknowledged that the district centre uses now includes B8 uses to allow the full quantum of employment uses required by Adopted Local Plan policies to be brought forward. In a similar vein B2 uses should also be added to the list of district centre uses so that Policy NC3 can be implemented consistent with the NEV SPD Illustrative Masterplan. In ensuring such employment uses specifically required by the Local Plan come forward in a form that compliments the mixed-use district centre care will be needed at the development management stage to incorporate these uses in this manner.		Noted and Agreed. B2 (general industry) and B8 (storage or distribution) uses are included in the key as acceptable District Centre uses, subject to being in a location and form that complements the mixed-use District Centre (Policy NC3 refers).
15	DV4 Properties Swindon Co. Ltd (D	3		The Illustrative Masterplan shows large areas of Green Infrastructure around the areas identified for employment use (use Class B2 B8) yet very little Green Infrastructure within the district centre. The area of land within the Symmetry Park application site constrained from development due to the requirement for preservation of archaeology in situ should not be identified as Green Infrastructure. It is land which needs to remain undeveloped to enable the long term preservation of the archaeological remains.		The District Centre zoned land will be developed for a wide range of uses, including residential. A more detailed Design Brief will be prepared for this area and provision of public realm areas, including green open spaces, will be required as part of its overall planning and design.

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15	DV4 Properties Swindon Co. Ltd (D	4		The area of land protected from development (archaeological constraint) within the "Hub" development should not be shown as Green Infrastructure; it is land to remain undeveloped to enable the long term preservation of the archaeological remains.		The land will not be developed and will remain as a green area. It is therefore effectively GI and a visual amenity, albeit that public access may be prohibited, or discouraged, by DB Symmetry.
16	Hannick, Hallam and Taylor Wimpe	1		Principally, 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.
16	Hannick, Hallam and Taylor Wimpe	2		As a consequence HHT has sought, with other developers/landowners (as is evident from the Statement of Consultation that accompanies the Draft SPD), that the SPD be drafted more flexibly to ensure that it is effective and justified.		The purpose of the SPD is to provide a clear and transparent approach as to how the Council will seek to secure a Framework S106 Agreement. This will serve to secure the necessary planning obligations to deliver the infrastructure required to achieve sustainable development at the NEV in accordance with the Local Plan 2026.

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16	Hannick, Hallam and Taylor Wimpey	3		<p>As context to these further representations, HHT enclose as Appendix 1 the observations of Bickley Martin Planning Law in May 2016. Those observations raised issues of principle in relation to approach; viability; mechanisms for review of the SPD and IDP; and use of planning conditions.</p> <p>Whilst it is acknowledged that minor changes have been made in respect of some of these issues e.g. the inclusion of a section on economic viability it is generally the case that little or no change has been made or that the changes do not address the important matters previously raised.</p>		<p>Section 4 of the SPD provides information on viability. The Council has carried out an independent Financial Viability Assessment (FVA) in respect of the costs of infrastructure required as part of the NEV development. The FVA demonstrates that NEV is broadly deliverable with the required level of contributions to the costs of infrastructure as set out in this SPD, subject to assumptions around site specific costs, such as ground works etc. The Council will commit to an annual review of the NEV IDP and publish an updated appendix of costs annually that will remain fixed for the next 12-month period.</p>

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16	Hannick, Hallam and Taylor Wimpey	4		<p>The Framework Agreement is not an expectation or requirement of the Swindon Local Plan and hence amounts to a new policy beyond that set out in the Local Plan. To set out such new policy is contrary to the purposes and role of SPDs. While SPDs do not follow the same processes as Local Plans or other Development Plan Documents, SPDs are expected to assist delivery and not place unnecessary burdens on development (para 153 of the NPPF). They must not create new policy. They should be:</p> <ul style="list-style-type: none"> ☐ justified and based on evidence; ☐ be effective which includes a need to demonstrate deliverability 		<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.</p>
16	Hannick, Hallam and Taylor Wimpey	5		<p>One particular aspect of the need for effective and deliverable guidance in SPDs is the need for flexibility. It isn't deliverable. As such it is likely to impact negatively on the delivery of the NEV. In so doing it places a particular and intractable burden on the development process and development itself in respect of the New Eastern Villages. It does so unnecessarily by not acknowledging the opportunities for flexibility and an effective alternative approach.</p>		<p>The Council consider that in the interests of delivering fair and equitable distribution of the necessary planning obligations, and in the absence of examples of 'alternative mechanism', the Council consider that a framework Section 106 Agreement will ensure the effective delivery and maintenance of the required infrastructure.</p>

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16	Hannick, Hallam and Taylor Wimpey	6		No evidence is offered in the document of the effectiveness of the Council's approach and all of the evidence of the Consultation process is that it will not prove effective. The consultation process amounts to substantive evidence. No evidence is provided in the Statement of Consultation to contradict the concerns expressed by various parties in relation to the previous version of the SPD.	As a result HHT remain of the view that it is important that the SPD is further modified to ensure that the approach adopted allows for flexibility and supports and does not undermine the delivery of the NEV. It needs to allow for alternatives and to recognise that the approach set out by the Borough Council is not the only means by which necessary infrastructure may be delivered.	The infrastructure costs, set out in the IDP, are representative of the Council's most accurate estimation based upon the current evolution of scheme design and specification. These costs will evolve and will be fixed for the purposes of engrossing S106 agreements and as such will necessarily be justified at the point of granting planning permissions.

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16	Hannick, Hallam and Taylor Wimpe	8		<p>Para 2.10 (previously Para 2.19): Given the issues surrounding the deliverability and feasibility of a Framework Agreement Para 2.10 should be modified to provide sufficient flexibility to allow an alternative approach to a Framework S106 Agreement and to reflect the aspiration to achieve a Framework Agreement. Moreover the SPD needs to recognise that a Framework Agreement is not critical to achieving appropriate development as part of the wider NEV through the deletion of the last sentence in the last bullet point of para 2.10. Other alternatives are available to achieve this aim and this also needs to be reflected in this part of the SPD.</p> <p>Whilst the following additional sentence is proposed by HHT to be added to paragraph 2.10 of the SPD, it is also appropriate to add the paragraph after paragraph 4.5 of the present SPD.</p>	Please refer to the original copy of the representation for details of proposed change to the text.	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.
16	Hannick, Hallam and Taylor Wimpe	9		Suggested changes also to paragraphs 2.4 and 4.3.	Please refer to the original copy of the representation for details of proposed change to the text.	Noted.

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16	Hannick, Hallam and Taylor Wimpe	10		<p>While in paragraph 4.5 the SPD provides 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". The need for such a procedure remains unrealistic but also unnecessary.</p> <p>The SPD should be amended to provide further flexibility. This should include deletion of the reference in the last sentence of para 4.5: "and agree the precise equalisation procedure at developer cost". The wording should also revert to that in para 3.5 of the previous draft where developers and landowners are encouraged and not required to seek equalisation arrangements. To be required would not be deliverable, effective of sound.</p>	Please refer to the original copy of the representation for details of proposed change to the text.	Para 2.13 of the SPD clearly sets out the Council's approach to equalisation.

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16	Hannick, Hallam and Taylor Wimpe	11		Other consequential amendments to the SPD may also be necessary HHT propose the following amendments for instance to the text at Paragraphs 5.8, 5.12, 5.18 to provide sufficient flexibility to allow an alternative approach to a Framework S106 Agreement. The wording should be amended as follows - to accord with national and local policy and guidance - and ensure effective delivery of the NEV:	Please refer to the original copy of the representation for details of proposed change to the text.	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.
16	Hannick, Hallam and Taylor Wimpe	12		<p>For reasons stated 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> <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>	Suggest the following addition to para 1.8 or 1.11: "The extract of the IDP that relates specifically to the delivery of the NEV has been updated. It is inevitable that certain costs will evolve as new 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."	As stated in the SPD, the IDP will be reviewed on an annual basis.

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16	Hannick, Hallam and Taylor Wimpey	15		<p>HHT welcomes the recognition of the need for external funding to support the delivery of the NEV including forward funding as noted in paragraph 4.8.</p> <p>Para 4.8 however is not sound in being prescriptive regarding the retrospective securing of funding to offset external funding. It must be that the circumstances relating to, and need for the offsetting of forward funding will vary on a case by case basis that will include the nature of the infrastructure, the funding, the reliance of phases of development upon it etc.</p> <p>Para 4.8 needs to be amended.</p>	Please refer to the original copy of the representation for details of proposed change to the text.	<p>Noted. Where funding is to be provided by external bodies for the provision of infrastructure, there will be a provision in the legal agreement between the Council and the landowner/developer providing a mechanism to off-set or pay back the correct proportion of the contribution paid by the landowner/developer towards the same infrastructure as appropriate. It may not be possible to assess this until all the relevant infrastructure has been delivered and comprehensive final costs of delivery are known.</p> <p>Where forward funding has taken place in order to ensure the early provision of infrastructure, the Council will secure section 106 contributions retrospectively with the grant of planning permissions post-dating the provision of such infrastructure so as to reimburse the forward funder(s) of the infrastructure.</p>
16	Hannick, Hallam and Taylor Wimpey	16		<p>HHT welcomes the recognition in para 4.9 of the SPD that the costs of delivering infrastructure elements in the SPD will change as more details designs take place and as time moves on. HHT also welcomes the recognition that costs of delivery may well reduce.</p>		Support noted.

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16	Hannick, Hallam and Taylor Wimpe	17		HHT certainly consider that a number of the items in the SPD and Infrastructure Delivery Plan considerably exaggerate the likely costs involved. One reason for doing so may well be the substantial contingency costs. HHT are not however in a position to provide detailed alternative costings of the Council's aspirations.		Costs will be refined through detailed design and the delivery process. As stated in the SPD, the NEV IDP will be subject to an annual review. 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.
16	Hannick, Hallam and Taylor Wimpe	18		<p>Equally it is not acceptable for the Council to imply as it seeks to do in paragraph 1.13 of the SPD that the IDP prepared by the Council was found to be sound alongside the Local Plan at and following the Local Plan Examination.</p> <p>Whilst the IDP formed part of the evidence base for the Local Plan, at no point was it tested in any detail. The inspectors concerns are set out in the examination documents and in his report - i.e. that he was simply seeking to ensure that there were no showstoppers (see for instance LPA documents CD25.9 and 25.63 on Infrastructure priorities). The IDP was and is a high level document which has not been subject to detailed or independent testing. Indeed the detailed cost breakdown of individual items within the IDP or SPD is not generally available.</p>		It is not the intention of this paragraph to state otherwise. Paragraph 1.13 makes it clear that without a comprehensive and evidence based IDP, the Local Plan would not have been found sound at examination.

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16	Hannick, Hallam and Taylor Wimpey	18		<p>It follows from such circumstances that:</p> <p>It is not reasonable, fair or proportionate to seek contributions based on the figures in the IDP and now SPD;</p> <p>To be fair reasonable and proportionate the detailed justification for each infrastructure item and the costs associated with it will need to be transparent and up to date and fully justified at the point at which planning permission is granted having regard also to the detailed information that forms part of the application proposals</p> <p>It is not fair, reasonable or proportionate to base costs to be included in section 106 agreements on high level figures or in the expectation that there may be some reimbursement of costs not incurred at some future date.</p>		<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.</p>

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16	Hannick, Hallam and Taylor Wimpe	19		<p>Landowners will require detailed justification of infrastructure items and costs – including at the time of the grant of planning permission. This will be a necessity before section 106 agreements can be completed. This must be recognised in the SPD.</p> <p>Moreover the costs of infrastructure will be refined having regard to the means by which infrastructure is to be provided and in the light of the more detailed information on mitigation and infrastructure needs and provision that emerges through specific planning applications.</p>	Please refer to the original copy of the representation for details of proposed change to the text.	Noted. The IDP sets out the evidence and justification for each of the infrastructure requirements including the policy background. The Council will commit to an annual review of the NEV IDP costs and publish an updated appendix of costs annually that will remain fixed for the next 12-month period.
16	Hannick, Hallam and Taylor Wimpe	20		<p>The wording at Para 5.3-5.6 now clarify that the Illustrative Masterplan is intended to form part of the SPD.</p> <p>Where both paragraph 5.6 refers 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. That includes the implications of possible land contamination at Rowborough.</p>	Please refer to the original copy of the representation for details of proposed change to the text.	Point noted. It is considered unnecessary to add further text to paragraph 5.6 as it already makes it clear that proposed development should be in broad accordance with the Masterplan. Subsequent proposals will be subject to detailed Masterplanning, EIA and Reserved Matters applications.

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16	Hannick, Hallam and Taylor Wimpey	21		<p>Para 5.7 addresses the delivery of infrastructure more generally. Some amendments are necessary to the wording of paragraph 5.7 are necessary including to ensure consistency with national guidance (including the NPPF) and case law. Specifically:</p> <p>☐ direct delivery of infrastructure off site can only be reasonably secured where the land is under the control of the relevant developer or can be secured through a section 278 agreement;</p> <p>☐ the purpose of infrastructure delivery (and obligations) is to ensure that the impacts of development are appropriately mitigated rather than to achieve particular objectives;</p> <p>☐ infrastructure delivery should not jeopardise delivery;</p> <p>☐ development may be enabled on a village by village basis</p> <p>☐ there needs to be a recognition that the potential infrastructure requirements identified in the SPD may be modified (not just added to) in the light of the more detailed considerations, consultation</p>	Please refer to the original copy of the representation for details of proposed change to the text.	The securing of infrastructure through planning obligations must be compliant with the CIL Regs as detailed in Section 2 of the SPD.

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				and evidence that emerge or take place in the context of planning applications.		
16	Hannick, Hallam and Taylor Wimpe	23		<p>HHT consider that a number of infrastructure elements should not be included in the schedule of infrastructure requirements. It is fundamental that infrastructure must be sought only where it is necessary to make the development acceptable in planning terms and is fully justified and evidenced.</p> <p>In particular, HHT would draw attention to the provision of £1.9 million for public art which is not necessary to make the development acceptable. Advice in the Planning Practice Guidance actively deters authorities from seeking such contributions for such reasons.</p>	<p>Table 1 should be amended and reduced to those elements directly related to the NEV and necessary to mitigate the effects of development to those which are acceptable. To this end elements to be deleted from the list include: Public art, Health services, adult social care, District Heating Network. This would not necessarily be an exhaustive list.</p>	<p>Policy DE1 sets out a requirement for the delivery of public art, recognising its significant contribution that can be made to the public realm and street scene. The recently adopted Swindon Residential Design Guide (June 2016) supports this approach.</p>
16	Hannick, Hallam and Taylor Wimpe	24		<p>HHT also consider that Adult Social Care and Health Facilities should not form part of the infrastructure requirements for the NEV. Insofar as need arises then this is to be delivered not through section 106 implications but through alternative and existing funding streams making contributions from the NEV unnecessary. Equally, no evidence if provided for the need for such facilities (having regard to existing provision and means of delivery and procurement).</p>		<p>In accord with adopted policy, there is evidence to support the requirement for the proposed health facilities and Adult Social Care at the NEV provided which has been provided by the respective service areas.</p>

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16	Hannick, Hallam and Taylor Wimpe	25		<p>The District Heating requirement is not a matter of policy requirement. It is not deliverable in technical or financial terms and it is not required to make the development acceptable. It is certainly not evidenced in the documentation.</p> <p>There is also a query as to whether the Leisure Sports Facility overlaps with the hubs.</p>		Policy NC3 sets out the requirement for the provision of a District Heating Network.
16	Hannick, Hallam and Taylor Wimpe	26		<p>Third if some of the elements of the infrastructure such as the Southern Connector Road are included in the list of infrastructure requirements across the NEV then it is apparent that other elements of infrastructure should also be included within the schedule of infrastructure.</p> <p>One such item to be included in the list would be the provision of an under-bridge to the north of the A420 to Rowborough. This should be added to the list or the requirement for aspect of infrastructure that relate to particular parts of the site - e.g. Southern Connector Road.</p>		The railway underbridge serving Rowborough represents direct development access and is therefore not subject to NEV wide contribution as strategic infrastructure. The underbridge will however be secured against the delivery of the Rowborough Development, subject to an agreed trigger.

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16	Hannick, Hallam and Taylor Wimpe	27		<p>HHT consider that the specific "Estimated Capital costs" may be better deleted as per the previous iteration of the SPD. On the one hand the costs associated with a number of elements appear particularly excessive and for which there is no transparent and assessed justification.</p> <p>Examples include: the costs of the modified White Hart proposals; the southern connector Road, Adult Social Care; Nature Reserve; Major Open Space. There are others but these are perhaps the largest. More to the point it is essential that each item is fully justified (including in terms of cost) at the point of granting planning permissions (as is discussed in the representations above).</p>		<p>The Infrastructure Delivery Costs, as set out in the SPD, are representative of SBC's most accurate estimation based upon the current evolution of scheme design and specification. These costs will evolve and will be fixed for the purposes of engrossing S106 agreements and as such will necessarily be justified at the point of granting planning permissions.</p>
16	Hannick, Hallam and Taylor Wimpe	28		<p>The requirement for Major Open Space and Nature reserve will need to be reviewed in the light of the provision for green infrastructure being delivered in each village including through the village proformas. It is unclear that such items should be included in Table 1 given the provision on a site specific basis through the villages. Likewise allotments.</p>		<p>Major Open Space and GI policy requirement is set out in the adopted Local Plan and will be further detailed in the emerging GI Strategy for the NEV. The balance of on-site and off-site provision will be further considered at the during the development management process.</p>

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16	Hannick, Hallam and Taylor Wimpey	29		<p>Whether the cost information is retained in Table 1 or not if it remains then this must be appropriately caveated as suggested elsewhere and as follows:</p> <p>The NEV IDP Update provides revised information on the most up-to-date and available costs of the NEV infrastructure. Nevertheless the Council recognises that such costs remain of a relatively high nature. In circumstances where the projects move forward to final design and procurement stage the cost of delivery will become clearer and fixed.</p> <p>Moreover the costs of infrastructure will be refined having regard to the means by which infrastructure is to be provided and in the light of the more detailed information on mitigation and infrastructure needs and provision that emerges through specific planning applications.</p> <p>The Council understands that for contributions to be reasonable, fair and proportionate, and directly related to development, it will be necessary for the infrastructure items and the costs associated with each item to be transparent and fully costed and justified and for this to have been completed at the time of</p>		<p>Table 1 detailed in the SPD has been amended to exclude cost information. The SPD states clearly that the IDP will be reviewed on an annual basis which will be subject to public consultation. In instances where new or updated information becomes available from relevant Government or Council service areas that update project costs, current use values or cost indicators, the Council will amend the IDP. This is to ensure that contributions payable to the Council reflect the actual current costs of infrastructure.</p> <p>The provision of open space and green infrastructure is clearly set out in Policy NC3 and EN3 of the adopted Local Plan.</p>

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				<p>granting planning permission. This will be necessary for landowners to enter into section 106 agreements. It will also need to take account of external sources of funding.</p> <p>Given the provision for green infrastructure in the villages (very extensive in South Marston and Rowborough for instance) HHT consider that the proposals for major open space and nature reserve should be removed from the list in Schedule 1 or at least substantially revisited.</p>		
16	Hannick, Hallam and Taylor Wimpey	30		<p>The reference in Table 1 to the New Link across the railway at Footpath 5 should be corrected to an improved link across the railway. The same reference should be deleted from Table 2 where it is duplicated.</p>		<p>Point noted, however it is not considered necessary to review the reference to this item of infrastructure.</p>

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16	Hannick, Hallam and Taylor Wimpe	31		<p>Paragraph 5.11 draws a distinction between shared infrastructure (presumably Table 1) and local infrastructure (presumably Table 2 and the village proformas). The means by which such provision is ensured will depend on the mechanism adopted – and must for the reasons set out above allow flexibility in the approach to be adopted.</p> <p>For this specific and important purpose, paragraph 5.11 should be amended with the addition of the following important clarification:</p> <p>“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, where an alternative solution is progressed then some of the shared items included in Table 1, may be delivered by particular villages and some of the items may be delivered by a group, but not all of the villages”.</p>		Noted.

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16	Hannick, Hallam and Taylor Wimpe	32		<p>The wording at Para 1.11 of the Draft SPD suggests that the Proformas and IDP form part 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 and the establishment at the point of permission of robust justifications for infrastructure elements and costs.</p>	<p>Add additional sentences to para 1.11:</p> <p>For the avoidance of doubt the infrastructure referred to as the Village proforma and IDP 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</p>	<p>The village proformas, IDP and the Masterplan form part of the SPD.</p>

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16	Hannick, Hallam and Taylor Wimpey	33		<p>Policy HA2: Affordable Housing</p> <p>The wording in the first bullet point in para 2.21 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>		The policy approach detailed is consistent with the adopted Local Plan.

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16	Hannick, Hallam and Taylor Wimpey	34		<p>Framework Agreement – Our view is that the Framework Agreement approach is unrealistic and there must be considerable doubt as to whether it is workable due to the large number of landowners and developers, some of whom are promoting development schemes and some of whom are not. The same concerns apply to the proposal to agree an equalisation procedure (ref: para 3.5).</p> <p>Our response to the draft SPD consultation sets out specific amendments to the SPD with a view to introducing sufficient flexibility to allow an alternative approach, if it proves unfeasible to secure a Framework S106 Agreement. This proposed flexibility should be introduced into the wording of the SPD in order to avoid the SPD being overly narrow and restrictive in this respect.</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.

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16	Hannick, Hallam and Taylor Wimpey	35		<p>HHT are concerned viability is not covered in the SPD in a clear way. In our view it should be made clear that viability assessments may have a role in defining the S106 packages for the NEV. There are some references to viability in the draft SPD which suggest that this is the case - see the general reference in para 5.2 and the more specific references in relation to the affordable housing being subject to economic viability assessment (para 2.17), and triggers for delivery of infrastructure not jeopardising the viability of development (para 2.19). In our view these comments are not sufficiently clear and the SPD should expressly make it clear that the inclusion of certain items in the S106 package may be subject to viability:</p> <p>For example, items required as part of the sustainability agenda (e.g.. district heating) may be stretching the overall viability of the sites and should be qualified to make it clear that this may depend in viability.</p>		The viability section of the SPD has been reviewed to improve clarity.

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16	Hannick, Hallam and Taylor Wimpe	36		<p>Use of Planning Conditions - this is only mentioned twice: in a general sense in para 2.17 and then specifically in para 4.15 in the context of on-site infrastructure. Consideration should be given as to whether this reference is expanded or whether the document makes a specific reference to planning conditions being used, especially in the context of an alternative approach to a Framework S106 Agreement being adopted. At the very least the reference in para 4.15 should not be limited to "on site infrastructure" as conditions could be used to deliver off site infrastructure where the relevant off site land is either highway or under the control of the relevant developers - the easiest example is off site highways which may be delivered by a combination of planning condition and S278 agreement.</p>		<p>Conditions and S278 will be used where appropriate. The SPD will be reviewed to address this.</p>

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16	Hannick, Hallam and Taylor Wimpe	37		<p>Some thought about how the document may change or be reviewed going forward is required. The IDP (March 2014) includes at Para 5.5 the following text: "Furthermore, where necessary, the Council will replace adopted guidance with Supplementary Planning Document(s), incorporating a review mechanism to ensure that they remain fit for purpose throughout the timescale of the Local Plan. So two points arise:</p> <p>☐ Consideration should be given as to whether the SPD needs a review mechanism to allow flexibility on detailed points such as Table 1 in para 4.19. This would appear to be sensible as the table may well be subject to change.</p> <p>☐ Para 4.13 should make it clear that the list of infrastructure referred to as the Village Pro Forma do not form part of the SPD and that such lists are flexible and will be subject to review.</p>		Point noted, the SPD has been updated to make clear that substantive changes will result in a comprehensive review and will be subject to public consultation. As stated at paragraph 1.11, the SPD comprises of the Masterplan (which provides further explanation to Figure 11 of the Local Plan), the NEV IDP and Village Proformas in order to provide a robust framework.
16	Hannick, Hallam and Taylor Wimpe	38		Track change document submitted and detailed comments made with regards to the South Marston and Rowborough village proformas. Please refer to original for more details.		Noted.

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16	Hannick, Hallam and Taylor Wimpe	39		HHT is conscious of discussions (and agreement in principle) in relation to the expansion of the existing primary school. Were the expansion of the existing school not to take place, an alternative school site would be required. HHT's possible alternative site on its land should be reflected on the Masterplan as is the case with the present planning application.		Noted. The LPA accepts that an alternative school site would be needed if agreement with the Parish Council was not reached over the use of part of the Recreation Ground (with associated provision of compensatory land). However, agreement in principle has been reached and the inclusion of an inset plan is not considered necessary.
16	Hannick, Hallam and Taylor Wimpe	40		Were a school site to be required on HHT land, an equivalent area of residential land would need to be brought forward (as included in the HHT planning application). It is appropriate that such additional parcels are annotated as alternative parcels or within an inset.		Noted. The principle of "equivalent area of residential land provision" is accepted in the event of the school being built on HHT land. The inclusion of an inset plan is not considered
16	Hannick, Hallam and Taylor Wimpe	41		HHT advise upon completion of present discussions that any very minor amendments relating to residential parcels adjacent to the hotel site be addressed and that a small area of like for like compensatory provision is made.		Minor revisions have been made to the Masterplan to cover this point.
16	Hannick, Hallam and Taylor Wimpe	42		HHT proposes minor amendment to the Rowborough employment zone adjacent to the A420.		Accepted and smaller employment zone is depicted on the Masterplan.

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16	Hannick, Hallam and Taylor Wimpe	43		HHT proposes a marginally more centralised location for the village centre at South Marston.		Noted. The Masterplan sites the Village Centre slightly further to the east on land owned by the Parish Council. It is accepted that the village centre could be sited further to the west if agreement with the Parish Council is not reached.
16	Hannick, Hallam and Taylor Wimpe	44		Generally welcome the alignment of the primary street within the expanded South Marston village, as shown on the revised illustrative Masterplan.		Point noted.
16	Hannick, Hallam and Taylor Wimpe	45		HHT continues to regard the provision of a second access onto Old Vicarage Lane to be an important part of the Rowborough access strategy. The Technical Note provides a full justification for its provision.		No objection is raised to a second vehicular access linking Rowborough with Old Vicarage Lane, subject to full technical assessment to demonstrate that a street or lane, with a simple priority junction and appropriate detailing of character, alignment and width, works in transport terms (current HHT justification is incomplete).

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17	Highways England	1		<p>Highways England provided formal comments dated 3 May 2016 in respect of the earlier draft SPD, which outlined our position in respect of the inclusion, or otherwise, of SRN infrastructure required to ensure the cumulative impact of the NEV development would not be severe. In particular, we outlined that in light of the evidence base demonstrating that the NEV development generates a severe impact on the A419T White Hart Junction and M4 Junction 15, Highways England would encourage you to include the respective improvement schemes as a key strategic shared infrastructure requirement for the NEV development site (Table 1). Having reviewed the proposed revised SPD, I note that reference to M4 J15 has not been included in this revision. This is disappointing given the importance of SRN infrastructure to the timely delivery of the development.</p>		<p>Junction 15 works are included in each of the Village Proformas as part of the strategic highway package.</p>
17	Highways England	2		<p>On the basis of the above, our comments dated 3 May 2016 remain extant and I would strongly recommend that we continue to engage proactively in respect of NEV and the SRN infrastructure requirements to ensure that appropriate funding and delivery mechanisms are identified which facilitate the delivery of the NEV development.</p>		<p>Agreed.</p>

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17	Highways England	18		The Park & Ride site is relocated closer to the village centre/education provision to create a hub of activity and complementary uses in location.		For strategic transport reasons the LHA recommends that the P&R site is located closer to the NEV eastern access. No change is made to the P&R site location.

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18	Network Rail	1		<p>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>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 site allocation or planning application that this quantifies in detail the likely impact on the rail network.</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.</p>	<p>A requirement for development contributions to deliver improvements to the rail network where appropriate.</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 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.</p>	<p>The rail network accommodates strategic level trips of a regional function and would be implicated by development and natural growth, more far reaching than that simply applied by the NEV. In this regard, such contributions should be sought by CIL 123 list arrangements rather than via S106, which may prejudice such wider contributions.</p>

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18	Network Rail	2	2	“Network have several vulnerable earthwork assets comprising soil cuttings and embankments through the proposed development zone and the geology in the area is sensitive to changes in moisture content whereby introduction of surface or groundwater on our assets could have detrimental effects leading to instability. We need to be consulted on all plans for future development including drainage, road works and other infrastructure.”	<p>No soakaways, attenuation tanks etc. shall be located within 20m of NR boundary (SUDS is stated in admin)</p> <p>All Surface / foul water to be discharged into Public Sewer</p> <p>Ground levels – If altered to be such that surface water runoff flows away from the railway</p>	Noted, as a statutory consultee, Network Rail will be consulted upon all development proposals at the NEV. There are limited foul sewers and no surface water sewers in the development areas.
19	The Woodland Trust	1		We are pleased to see the references to open space and the Great Western Community Forest		Support noted.
19	The Woodland Trust	2		We would still like to see a specific reference to the need to make provision for trees and woods as a key element of green infrastructure to the south of the Eastern Villages site, particularly linking into the Woodland Trust’s Warneage Wood, north of Wanborough.		There is in place an approved borough wide GI Strategy and 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 bespoke GI Strategy for the NEV will look further into the need for off-site mitigation, access and models for delivery.
19	The Woodland Trust	3		The Woodland Trust believes that woodland creation is especially important because of the unique ability of woodland to deliver across a wide range of benefits.		Noted, embraced within GWCF policy and no doubt will be amplified in the emerging GI Strategy.

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19	The Woodland Trust	4		We also consider that the Council has a statutory duty to protect trees and promote tree planting in an Open Space Study.		SBC exercises protection of trees through the planning process, TPO's and Conservation Area designation. Local Plan policies, the Borough wide GI Strategy, GWCF policy and the emerging NEV GI Strategy will ensure appropriate tree planting in both open space and built areas.
19	The Woodland Trust	5		We would therefore like to see this SPD include a specific reference for provision for woods and trees as a key element under the 'Major Open Space', 'Local Open Space' and 'Great Western Community Forest' headings of Table 1.		SBC exercises protection of trees through the planning process, TPO's and Conservation Area designation. Local Plan policies, the Borough wide GI Strategy, GWCF policy and the emerging NEV GI Strategy will ensure appropriate tree planting in both open space and built areas.
19	The Woodland Trust	7		We would like to see the 'Infrastructure Requirements' include appropriate development mitigation costs and obligations in order to comply with Paragraph 109 of the Governments National Planning Policy Framework ((DCLG, March 2012) on protecting biodiversity.		The village proformas specifies biodiversity requirements, as set out in Policy EN4.

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19	The Woodland Trust	8		As previously requested, we would like to see a specific reference in this document to a clear obligation for developer contributions to be levied to compensate for increased management costs and also to mitigate the habitat disturbance likely to affect Warneage Wood and other green infrastructure assets located in the 'Indicative Non-Coalescence Area' almost on the boundary of the proposed 2,000 homes (2021/22-2025/26) development. This is required under Policy IN1: Infrastructure provision, as also set out in paragraph 4.217, of the adopted Swindon Borough Local Plan 2026.		There is in place an approved borough wide GI Strategy and 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 bespoke GI Strategy for the NEV will look further into the need for off-site mitigation, access and models for delivery.
19	The Woodland Trust	9		To the west of Marsh Farm is a large population of ancient, veteran and notable trees already recorded on the Ancient Tree Inventory. It is certain that there would be some loss and certain damage of a number of these trees if a road was to be constructed in their vicinity.		Will need to refer to the Tree officer, not aware of the details. Canal alignment perhaps equally a risk. Support the principle of veteran tree preservation but there is of course the balance of necessity with the road and what is possible in alignment. The delivery of the road no doubt has involved consultants and necessary surveys to guide the road alignment.

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19	The Woodland Trust	10		Due to the significant concentration of large, notable and veteran trees in the area, the veteran trees likely to be damaged or lost provide some of the closest potential replacement habitat for any rare species associated with decaying wood habitat, aging bark and old root systems. The larger the concentration of old trees in an area and the longer they have been present on site the richer the variety of species you will find among them. For this reason it is essential that no trees displaying ancient/veteran characteristics are lost as part of the development.		Will need to refer to the Tree officer, not aware of the details. Canal alignment perhaps equally a risk. Support the principle of veteran tree preservation but there is of course the balance of necessity with the road and what is possible in alignment. The delivery of the road no doubt has involved consultants and necessary surveys to guide the road alignment.
19	The Woodland Trust	11		The Ancient Tree Forum (ATF) and the Woodland Trust would like to see all such trees recognised as historical, cultural and wildlife monuments scheduled under TPOs and highlighted in plans so they are properly valued in planning decision-making. There is also a need for policies ensuring good management of ancient trees, the development of a succession of future ancient trees through new street tree planting and new wood pasture creation, and to raise awareness and understanding of the value and importance of ancient trees. The Ancient Tree Hunt (http://www.ancient-tree-hunt.org.uk/) is designed specifically for this purpose.		Noted for consideration by SBC tree officer, there are TPO's in place west of Marsh Farm.

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19	The Woodland Trust	12		The Woodland Trust is strongly opposed to any development that would result in the damage or destruction of ancient and veteran trees. It is apparent that development of this area, particularly the positioning of a Southern Connection Road, could be devastating to the local population of ancient trees. Appropriate financial provision under 'Infrastructure Requirements' needs to be made for both an arboricultural survey and resultant buffering protection as part of future green infrastructure provision and must be specifically highlighted in this Planning Obligations document.		Will need to refer to the Tree officer, not aware of the details. Canal alignment perhaps equally a risk. Support the principle of veteran tree preservation but there is of course the balance of necessity with the road and what is possible in alignment. The delivery of the road no doubt has involved consultants and necessary surveys to guide the road alignment.
20	Sainsbury's Supermarket Ltd	1		The Sainsbury's store and district centre have important roles to play in containing newly generated trips within the NEV		Point noted.
20	Sainsbury's Supermarket Ltd	2		We support the change to the revised draft illustrative Masterplan which now clearly includes the existing Sainsbury's store within the designated District Centre.		Support noted.
20	Sainsbury's Supermarket Ltd	3		The New Eastern Villages includes A420 highway junction improvements. We wish to reiterate our previous comments that these improvements would need to be robustly demonstrated that they would not be detrimental to the operation of the existing Sainsbury's store or the future district centre.		Agreed. This will be done as the designs evolve.

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21	Forestry Commission	1		We welcome the integration of green infrastructure, community forest, open space, nature areas into infrastructure as a whole. Too often green infrastructure is an afterthought and is inadequately budgeted and programmed.		Support noted. In accordance with policy, development at the NEV will seek to secure an extensive green infrastructure network as an integral part of development.

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21	Forestry Commission	1		<p>Constructing a programme of planning obligations within the SPD that allows for an allocation of off site infrastructure requirements is required to ensure that Nightingale Wood is able to form part of a sustainable green infrastructure network that can enhance development.</p> <p>Development will inevitably lead to an increase in the use of the Nightingale Wood for informal recreation and potentially associated anti-social activity such as dog fouling, illegal motorbike access, fly tipping and littering. Whilst the Forestry Commission encourage and welcome informal recreational use of the forest, we are not resourced to respond to the additional capital and revenue costs that would directly result from a development of this significant scale without an allocation through a planning obligation for S106.</p> <p>As a public body we are required to consider the 'Protected Groups' that may access our woodlands through Equality Analysis, and undertaken an analysis of the 'Protected Groups' that may reside within the proposed development and identify specific provisions that the Forestry Commission would need to consider. This again should form part of the</p>	<p>Planning obligations within the SPD should include for consideration; the creation and maintenance of new waymarked footpaths (to manage access), provision of dog bins, interpretation, vehicular access prevention measures, community volunteer groups and recreation development plans.</p>	<p>Support noted. The emerging GI strategy will highlight and comment on mitigation for existing assets including Nightingale Wood</p> <p>There is a Borough wide GI Strategy and 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 bespoke emerging GI Strategy for the NEV will look further into the need for off-site mitigation, access and models for delivery.</p> <p>A DIA has been undertaken to ensure that the NEV Planning Obligations SPD will seek to promote inclusive communities and provide opportunities which are as accessible as possible for as many people as possible.</p>

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				planning obligations within the SPD.		
21	Forestry Commission	2		We welcome the reference to the need to mitigate the impact of development on existing infrastructure. A case in point may be the impact of increased use (and potential abuse) of Nightingale Wood. This wood is part of the Public Forest Estate and the Great Western Community Forest. There is a need ensure the allocation of sufficient infrastructure funding to mitigate the effects of the plan on the wood and other existing green infrastructure provision.		Support noted.
21	Forestry Commission	3		It is unclear how off site infrastructure will be secured by an 'other appropriate mechanism'. The risk is that offsite infrastructure (particularly tree and woodland planting in relation to the Community Forest) may get lower priority if mechanisms are not clear and transparent. Other mechanisms might include novel funding schemes, partnerships with delivery organisations, lease back arrangements. We welcome the securing of public		There is in place an approved borough wide GI Strategy and 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 bespoke GI Strategy for the NEV will look further into the need for off-site mitigation, access and models for delivery.
21	Forestry Commission	4		Table 1 We welcome this approach and the clear estimates of likely costs.		Support noted.

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21	Forestry Commission	5		Tree and woodland planting as part of green infrastructure is a key part of front loaded delivery. Structural planting, using smaller, cheaper trees will be more effective short term and more robust long term than planting fewer, expensive and more vulnerable large specimens. Where structural planting is identified, we would urge that planting is undertaken as soon as possible to the benefit of the early phases of development and the quality of life of first phase home buyers.		The need and opportunities for early woodland planting will be considered in the GI Strategy and in more detail in the assessment of detailed applications.
21	Forestry Commission	6		Appendix B We welcome the green infrastructure network connecting to Nightingale Wood. It is important that the red line of the development area is transparent in terms of linkages and corridors to the land beyond.		This will be considered in the GI Strategy and discussions with developers of adjacent housing ensuring linkage and access.
21	Forestry Commission	7		South Marston We note the provision of on-site GWCF planting schemes for on-site green infrastructure but contrast this to variance in other Village Proformas where combinations of on site and/or off-site planting are proposed. Is this variance intentional i.e. reflecting local circumstances, or is there a potential inconsistency?		Point noted, for consistency the village proformas have been reviewed to ensure opportunities to secure on and off site tree planting can be maximised.

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21	Forestry Commission	8		<p>Rowborough</p> <p>We welcome the need to set back housing parcels from the edge of Nightingale Wood. Close proximity can lead to multiple access from dwellings, fly tipping and complaints about shade/ leaf drop etc. It is far better to anticipate this through set back at the layout stage. This approach may be relevant in other development areas adjacent to existing woodland. Note comment on 2.20 above.</p> <p>We welcome the extensive GI network connecting with Nightingale Wood (note comment on 2.20 above).</p> <p>Here GWCF planting is stated as off-site (see above).</p>		Support noted.
21	Forestry Commission	9		<p>Welcome policy reference DE2 District Heating Network. This will help encourage locally grown and sourced wood for heat.</p>		Point noted.
21	Forestry Commission	10		<p>The SPD is very difficult document to use in order to understand the changes e.g. green infrastructure/ planting that are proposed. A single plan with so many layers makes changes difficult to find.</p>		Point noted.

Rep No	Organisation	Comment No	Page No	Justification	Proposed changes	Officer response
21	Forestry Commission	11		<p>Climate change and pests and diseases are very likely to have long term effects on green infrastructure, in particular water management, tree and plant health and maintenance regimes. It would be helpful to reference resilience as an underlying theme for the natural capital of the area and for the long term delivery of ecosystem services.</p> <p>The NEV SPD has the potential to deliver positive change and a high quality of life for the new communities. The new tree and woodland planting will coalesce with future and existing tree cover, creating an urban forest which will be an essential element of green infrastructure. A vision for urban forests has been created by England's Forestry and Woodland Advisory Committees. The vision and its supporting evidence make a strong case for the Urban Forest as critical infrastructure and I am sure it will be helpful in formulating the detailed delivery of both the NEV and Swindon as a whole.</p>		<p>Green Infrastructure has a large part to play in Climate Change resilience but for the NEV is part of an overall master plan that looks at the disposition of both natural and built elements. Each in their detail design and layout should meet this aim. This accords with the principles of Policy SD1 in the Local Plan and reference could be made to that.</p>
21	Forestry Commission	12		<p>Any development adjacent to Nightingale Wood will need to maintain a buffer to protect the woodland habitat. Avoid garden boundaries directly abutting the woodland to prevent fly-tipping.</p>		<p>Noted. Design Coding and Reserved Matters applications will be carefully considered to address this important concern.</p>

Rep No	Organisation	Comment No	Page No	Justification	Proposed changes	Officer response
22	The Ramblers	1	1	<p>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. It would still be helpful to have a map showing these distinctions.</p>		<p>The reduction in costs in the IDP reflects new ramps only, rather than the bridge as a whole which was previously included.</p>

Rep No	Organisation	Comment No	Page No	Justification	Proposed changes	Officer response
22	The Ramblers	2	1	<p>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.</p> <p>We note that the revised IDP shows a reduction in s.106 contributions required from developers from £1.5m to £1m. We hope this does not indicate a poorer quality/less accessible bridge. The proposed diversion of FP 6, where the existing rail crossing is to be closed, to run parallel with the railway to join FP 5 is not shown on the Masterplan and should be added. We welcome the diversion of FP 5 around South Marston Farm.</p>		Noted.

Rep No	Organisation	Comment No	Page No	Justification	Proposed changes	Officer response
22	The Ramblers	3	1	<p>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.</p> <p>We welcome the fact that FP 1 is now shown as crossing the A420 but it is unclear how this will be made safe. The area immediately north of the railway through which FP 1 passes is to remain as green space so we do not understand why FP 1 is shown as being diverted around the edge of this on a more circuitous route. Why is this section of path not being retained on its existing alignment? We note that an additional path from Rowborough between Old Vicarage Lane and FP 1 is also now shown; it is unclear how this will cross the railway.</p>		<p>Crossing points on the A420 are being reviewed as part of the planning application process for local development.</p> <p>The perceived diversion of FP1 reflects the application proposals and will necessitate a formal consulted diversion. Notwithstanding this, the area diverted around may form playing pitches where accessibility will not be obstructed.</p> <p>Between Old Vicarage Lane and Acorn Bridges, all railway crossings will be achieved via use of the existing accommodation tunnels upon agreement with Network Rail.</p>
22	The Ramblers	4	1	<p>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. Still unclear how road crossing will be made safe.</p>		<p>Crossing points on the A420 are being reviewed as part of the planning application process for local development.</p>

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22	The Ramblers	5	1	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. Linking path now shown – we welcome this.		Noted.
22	The Ramblers	6	1	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. This specific link does not appear to have been added.		There will be future opportunities to revise the proposed rights of way network and this will be achieved through development of the Green Infrastructure plan in coordination with local stakeholders.
22	The Ramblers	7	1	There is a need to ensure that those planning applications already submitted (Lotmead/Redlands) include provision for the new paths shown in the Masterplan. Partly overtaken by events as Lotmead applications have been refused but comment still applies to Redlands.		Agreed.

Rep No	Organisation	Comment No	Page No	Justification	Proposed changes	Officer response
22	The Ramblers	8	1	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? This question remains unanswered.		The development south of the A420 will be connected by comprehensive network of roads, footpaths and cycleways as illustrated on Masterplan.
22	The Ramblers	9	1	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. No further comment.		The Local Plan policy provision requires “a green bridge across the A419 near Covingham Drive to provide for walking, cycling and public transport”. It is proposed to provide a bridge that meets this policy requirement.
22	The Ramblers	10	1	10. It is not clear what the safe walking route will be from NEV to and across the re-designed White Hart junction. Still unclear.		Walking routes will be presented at-grade via signal controlled crossing points. The potential to retain the existing pedestrian bridge is also being researched.

Rep No	Organisation	Comment No	Page No	Justification	Proposed changes	Officer response
22	The Ramblers	11	1	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. We note the revisions made here but of the existing paths which cross the A419 only that from Covingham to Wanborough Marsh is now shown – it is not clear why.		Uncontrolled crossing points on the A419 will be removed from the Masterplan irrespective of their ROW status.
22	The Ramblers	12		The indicative network of Public Rights of Way (PROW) shown in the revised draft is an improvement to that shown in the original draft.		Point noted.
22	The Ramblers	13		It is not appropriate to label (in the key) every PROW as “strategic”. The inclusion of paths to meet recreational needs is just as important.		Noted and agreed. The key has been revised to read Indicative Strategic and Amenity Footpath /Cycleway/Public Rights of Way- to be detailed. A strategy, together with detailed proposals will be developed at the next more detailed stage(s) of planning for the NEV. There will be further consultation at these planning stages.

Rep No	Organisation	Comment No	Page No	Justification	Proposed changes	Officer response
22	The Ramblers	14		A number of detailed PROW alignment proposals and objections were made in relation to the first Draft Masterplan that have not been fully addressed.		It is accepted that individual parts of the overall network (both existing and proposed) need to be considered in detail. Refer to 2 above.
23	Natural England	1		Our comments only pertain to changes to the revised SPD (with one exception, below). Points raised in our previous consultation which have not been addressed still stand.		Point noted.
23	Natural England	2		The changes to the Masterplan appear to be relatively minimal. One comment is that there appears to be an overall increase in the extent of residential development in Foxbridge village at the expense of green infrastructure. This is a change we would rather not have.		There is a small increase of land allocated for residential use in these village areas. However, the LPA will require the provision of green infrastructure, for each NEV village, that fully accords with the requirements of SBLP Policy EN3: Open Space.
23	Natural England	3		Similarly, there appears to be an overall increase in the extent of residential development on the south east side of Lotmead village at the expense of green infrastructure. This is a change we would rather not have.		Any development proposals must accord with the policy requirements as set out in the suite of village proformas.
23	Natural England	4		A further point which we reiterate from our previous response is that it would be desirable to have public rights of way on both sides of the canal (together with crossing points at suitable intervals).		Noted. More detailed identification and specification of route types will be undertaken following adoption of the SPD.

Rep No	Organisation	Comment No	Page No	Justification	Proposed changes	Officer response
25	Historic England	1		<p>Our letter of 29 January 2016 regarding both applications, S/OUT/15/0753 and S/OUT/15/0754, sets out our views on the impact of the proposals on the significance of the Scheduled Roman settlement at Lotmead.</p> <p>This advice on the smaller outline application (your reference S/OUT/15/0754) therefore needs to be read in conjunction with the relevant sections of our letter of 29 January 2016.</p>		Noted.
25	Historic England	2		<p>With specific regards to S/OUT/15/0754, a significant portion of the proposed housing is within an area which would have a harmful impact on the setting and the contribution that setting makes to the significance of the Scheduled Monument. That harm is unjustified and contrary to Paragraph 132 of the National Planning Policy Framework; therefore we object to this application.</p>		Noted.
25	Historic England	3		<p>Additionally the Scheduled Monument falls outside the red line of application S/OUT/15/0754 and therefore there is no scope to deliver any of the possible enhancements to the Monument as</p>		Noted.

Rep No	Organisation	Comment No	Page No	Justification	Proposed changes	Officer response
25	Historic England	4		<p>These applications are for a development of up to 2,600 dwellings, along with other uses. They have the potential to impact on a number of designated heritage assets: in particular on the Roman Town of Durocurnovium, parts of which are protected as a Scheduled Monument under the Ancient Monuments and Archaeological Areas Act 1979.</p> <p>The land is allocated for development in the Local Plan. Appropriate, sustainable development here may help to meet local housing and economic needs, but this needs to be balanced against the conservation of the historic environment, which is identified as a key component of sustainable development in the National Planning Policy Framework (2012).</p>		Noted, detailed mitigation measures will be considered at the detailed planning application stage and determined in accordance with the adopted Swindon Borough Local Plan.
25	Historic England	6		<p>The site contains the buried remains of a Scheduled Roman settlement and is potentially within the setting of a number of Grade II listed buildings and conservation areas. Historic England's remit relates primarily to the impact of the proposals on the Scheduled Monument, although recent investigative works have uncovered the possibility of Roman remains outside the Scheduled area.</p>	We would recommend that you consult the council's own conservation officer and the county archaeologist on the possible impact of the proposals on other designated and undesignated heritage assets in the area.	Noted.

Rep No	Organisation	Comment No	Page No	Justification	Proposed changes	Officer response
25	Historic England	7		<p>Setting and Significance</p> <p>The Good Practice Advice in Planning Note 3: the Setting of Historic Assets makes clear that monuments that comprise only buried remains, retain a presence in the landscape and have a setting (pp4-5). The advice note goes on to state that “buried archaeological remains may also be appreciated in historic street or boundary patterns, in relation to their surrounding topography.....or through the long-term continuity in the use of the land that surrounds them. The relationship of this site to the landscape needs to be made clear and the contribution it makes to the monument’s significance.”</p>		Noted.

Rep No	Organisation	Comment No	Page No	Justification	Proposed changes	Officer response
25	Historic England	8		<p>The Scheduled Monument consists of substantial, buried archaeological remains of a former Roman town, known as Wanborough and identified as Durocurnovium. It was established on the course of the Roman road known as Ermine Street which linked two important regional centres; Cirencester and Silchester. The town included a core area with a gridded street pattern and administrative buildings, and a series of commercial, industrial and residential zones spread along the course of the road and out into the surrounding countryside. The town is mentioned on the 3rd century AD 'Antonine Itinerary', a popular travel-guide. It is likely the town was established here as it was adjacent to a recognised crossing of the River Cole, as well as the Dorcan Stream, and at a road junction off Ermine Street, leading south-west to the Roman settlement at Mildenhall.</p>		Noted.

Rep No	Organisation	Comment No	Page No	Justification	Proposed changes	Officer response
25	Historic England	9		<p>Ermin Street forms a strong landscape feature around which Roman and later field boundaries have been established. A number of these field boundaries close to the Roman Town, although presumed to be later in date, reflect the alignment of the Roman boundaries and may in fact have Roman origins. At a landscape level it is evidence of what the Roman Rural landscape around the town may have looked like, and adds to the setting and contributes to the significance of the Monument.</p>		<p>No change to the Masterplan is recommended at this stage. Detailed survey work needs to be undertaken to identify specific areas of findings and assess in detail whether any land should be excluded from development.</p>
25	Historic England	10		<p>The relationship of the Scheduled settlement with the crossings of the River Cole and Dorcan Stream, along with Ermine Street and the surrounding field system and open green spaces is, therefore, important in its contribution to our understanding and appreciation of the Monument and to its setting and significance.</p> <p>The Monument is currently on our Heritage at Risk register at High risk, due to the continued use of part of the site as a fruit farm and associated ground disturbance.</p>		<p>No change to the Masterplan is recommended at this stage. Detailed survey work needs to be undertaken to identify specific areas of findings and assess in detail whether any land should be excluded from development.</p>

Rep No	Organisation	Comment No	Page No	Justification	Proposed changes	Officer response
25	Historic England	11		Archaeological work in advance of this application has shown that there is the potential for Roman remains outside of the Scheduled area. In particular the presence of two Roman burials may indicate the existence of a cemetery associated with the Roman town. If these burials do comprise a larger Roman cemetery, then such an archaeological asset could be regarded as of national significance , in line with paragraph 139 of the National Planning Policy Framework (NPPF), and potentially a candidate for designation as part of the Scheduled Monument.		No change to the Masterplan is recommended at this stage. Further detailed assessment is required as part of Development Management stage(s) as currently no specifically defined areas have been identified by HE.
25	Historic England	12		<p>The site is allocated within the Local Plan for development; however the impact of the proposals on the setting of the Scheduled Monument still has to be considered.</p> <p>The majority of the development proposed for the site will not impact significantly on the setting of the Scheduled Monument. However, by virtue of their proximity to the Monument, the proposed housing on a small portion of the site (Plots 14 and 10) is of concern.</p>		No change to the Masterplan is recommended at this stage. Further detailed assessment is required as part of Development Management stage(s) as currently no specifically defined areas have been identified by HE.

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25	Historic England	13		Plot 14 lies immediately south-east of the Dorcan Stream in close proximity to the Scheduled Monument boundary. The Monument in this location has a close relationship with the stream and the rural landscape beyond. By building on this plot the links between the Monument and the crossing will be harmed, as will the direct relationship with the rural landscape setting beyond.		No change to Masterplan is recommended at this stage. Detailed survey work needs to be undertaken to identify specific areas of findings and assess in detail whether any land should be excluded from development.
25	Historic England	14		The dwellings on Plot 10, although away from the Monument boundary, will also impact on the rural setting of the Monument, which, despite the intrusion of some more modern field boundaries, does provide a direct link with the rural landscape of the Roman period. By introducing an urban element into this landscape that relationship will be impacted on. Within Plot 10 there is also the potential for additional Roman burials that may form part of a cemetery for the settlement. This undesignated archaeology needs to be protected or fully recorded prior to development. Proposed development in this area would introduce a degree of uncertainty to the proposals should further burials be found.		No change to the Masterplan is recommended at this stage. Detailed survey work needs to be undertaken to identify specific areas of findings and assess in detail whether any land should be excluded from development.

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25	Historic England	15		<p>Paragraph 132 of the NPPF states that "great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting". It goes on to state that Scheduled Monuments are "heritage assets of the highest significance".</p> <p>Paragraph 129 of the NPPF also advises local authorities "to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal."</p> <p>Paragraphs 126 and 131 also note "the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable use consistent with their conservation:"</p> <p>Policy NC 3 of the Local Plan 2026, is also relevant in that it states:</p> <p>'C. The development will ensure...the historic environment, including the Scheduled Monument, Earls court Manor, Great Moorleaze Farm and other Listed Buildings are protected, acknowledged and enhanced.'</p>		Noted, detailed mitigation measures will be considered at the detailed planning application stage and determined in accordance with the adopted Swindon Borough Local Plan.

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25	Historic England	16		<p>Historic England have no objection to the majority of the proposals. However, due to the impact on the relationship of the Scheduled Roman settlement with the features previously identified, such as the rural surroundings, the dwellings on Plot 14 would cause harm to the setting of the Monument and its significance. It appears that this harm could easily be avoided by relocating this small parcel of housing elsewhere on the 160 hectare site, and this harm is unjustified. It is therefore contrary to Paragraphs 129 and 132 of the NPPF.</p> <p>We are concerned that the houses on Plot 10 will also impact on and cause harm to the setting of the Monument. Given the possibility that this may also impact on undesignated archaeology associated with the monument, we would also recommend that these dwellings are removed or accommodated elsewhere on the extensive site.</p>		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	Page No	Justification	Proposed changes	Officer response
25	Historic England	17		<p>The substantial part of the Monument is within the red line development of the Masterplan and there is an opportunity here to improve its condition, management and use. Removing the Monument from fruit cultivation and introducing appropriate management is an opportunity to sustain and enhance its significance. This could prevent any further damage and remove the Heritage Asset from the At Risk register. This would be a positive benefit to the monument and support the application through paragraph 129 and 132 of the NPPF. This could be included in a Section 106 agreement.</p>		<p>No change to the Masterplan is recommended at this stage. Further detailed assessment is required as part of Development Management process.</p>

Rep No	Organisation	Comment No	Page No	Justification	Proposed changes	Officer response
25	Historic England	18		<p>We do not object to the principle of development of this site, nor the majority of the proposals as they currently stand. However, the dwellings on two small parcels of land will harm the significance of the Scheduled Monument. This appears to be unjustified, as within the larger Masterplan application there is the potential to relocate these dwellings. We therefore object to those small areas of housing as being contrary to the guidance in the NPPF and in policy NC 3 of the Local Plan.</p> <p>We recommend that :</p> <ol style="list-style-type: none"> 1. The proposed homes in plots 10 and 14 to be absorbed or relocated further north into the area north of the Lotmead Farm complex. Removing or relocating around half of the dwellings from Plot 10 (south and west of the curving field boundary crossing the plot) would substantially reduce the impact of this element of the proposal, and significantly reduce the risk of any conflict with any potential remains in this area. 2. If permission is given for development south of the Lotmead Farm complex on the area potentially comprising a potential Roman cemetery, that this is subject to archaeological excavation in advance of determination of any detailed application that may follow (NPPF paragraph 139). 		<p>No change to the Masterplan is recommended at this stage. Further detailed assessment is required as part of Development Management process.</p>

3. That part of the Scheduled Monument within the application area is subject to an appropriate management plan, in agreement with Historic England. This could be included in a Section 106 Agreement.

4. That you take advice from the local conservation officer and county archaeologist on the impact of the proposals on other designated and undesignated heritage assets

5. That

We would welcome the opportunity of advising further. Please consult us again if any additional information or amendments are submitted. If, notwithstanding our advice, you propose to approve the scheme in its present form, please advise us of the date of the committee and send us a copy of your report at the earliest opportunity.

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25	Historic England	19		<p>1. The 'development boundary' shown as parcels labelled 'A', 'B', 'C' and 'D' should be removed. Development here would result in a loss of significance to the Scheduled Monument via a change in setting. This is in accordance with our advice on the recent applications S/OUT/15/0753 and S/OUT/15/0754 (attached)</p> <p>2. We have some concerns over the 'development boundary' and 'education' parcels in the area annotated as 'C'. Recent survey work (not yet in the public domain) has identified the presence of substantial archaeological deposits in this area. These deposits are, potentially, of national importance and therefore possible candidates for Scheduling. Your colleague Melanie Pomeroy-Kellinger will have the details on these survey results.</p>	Please refer to annotated Plan.	<p>No change to Masterplan is recommended at this stage. Further detailed assessment is required as part of Development Management stage(s).</p> <p>With regards to Area C, detailed survey work needs to be undertaken to identify specific areas of findings and assess in detail whether any land should be excluded from development.</p>
27	Environment Agency	1		We have no specific comments to make on this SPD and the accompanying documents.		Point noted.

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27	Environment Agency	2		In terms of flood risk and the Illustrative Masterplan I would like to draw your attention to the Statement of Common Ground (SoCG) signed by ourselves and Swindon Borough Council on 1 April 2014. The SoCG documented our agreement that all the dwellings for New Eastern Villages can be delivered entirely within Flood Zone 1, with only essential infrastructure located outside Flood Zone 1 which would require mitigation to ensure flood risk is not increased. We would not wish to see any change in this agreement as the Masterplan progresses.		Noted.
27	Environment Agency	3		In terms of flood risk and the Illustrative Masterplan I would like to draw your attention to the Statement of Common Ground (SoCG) signed by ourselves and Swindon Borough Council on 1 April 2014. The SoCG documented our agreement that all the dwellings for New Eastern Villages can be delivered entirely within Flood Zone 1, with only essential infrastructure located outside Flood Zone 1 which would require mitigation to ensure flood risk is not increased. We would not wish to see any change in this agreement as the Masterplan progresses.		In accord with policy EN6, the village proformas clearly state that development at the NEV must provide on and off flood mitigation works.

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28	Haydon Wick Parish Council	1		Haydon Wick Parish Council considers that the issues surrounding the A420 have not been adequately addressed		The A420 corridor is a key focus for the transport planning of the NEV and is subject to numerous iterations of transport modelling and assessment.
28	Haydon Wick Parish Council	2		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.		Current delays on the A420 are believed to be created by inconsistent junction design and poor junction capacity. The NEV mitigation strategy aims to address its traffic impact through addressing the A420 junctions.
28	Haydon Wick Parish Council	3		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.		Noted.

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28	Haydon Wick Parish Council	4		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.		This will be considered and addressed with any sufficient size application in this area.
28	Haydon Wick Parish Council	5		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.		The SPD seeks to ensure that the infrastructure required to achieve sustainable development at the NEV is achieved. This is to ensure new and existing communities have easy access to everyday services.
28	Haydon Wick Parish Council	6		It is also pointed out that a radical review would be necessary to deter parents from parking vehicles and causing congestion around school locations in the new development areas.		The primary school strategy aims to ensure that schools are within easy walking distance and provide a community focus for each village. Driving to primary school will therefore be discouraged, but lessons learnt from existing situations will be incorporated in the school Masterplan designs..
29	Wanborough Parish Council	1		There is no cycle or footpath shown along Wanborough Road on the Masterplan.		Noted and agreed that footway provision along Wanborough Road will be required as a consequence of NEV development.

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29	Wanborough Parish Council	2		There is not enough detail shown on Masterplan for the main infrastructure junctions, just providing a circle at each junction is not sufficient to understand how for instance the Southern Connector Road will cross over the Wanborough Road.		The small-scale of the Masterplan does not allow detailed junction proposals to be illustrated. Each junction will be designed according to Highway Authority/Department of Transport requirements and all will be subject to reserved matters consultation and approval.
29	Wanborough Parish Council	3		The Masterplan should also show how the Southern Connector Road links in with Pack Hill and Commonhead Roundabout, this has been left off the map. The Southern Connector Road is a key piece of infrastructure within the NEV therefore the whole route of the road should be shown on the Masterplan.		The Masterplan covers the entire NEV strategic land allocation in the SBLP 2026. The SCR alignment and its detailed design, beyond the strategic land allocation, will be subject to a detailed planning application, with associated full public consultation.
29	Wanborough Parish Council	4		The route of the Southern Connector Road needs to be realigned to allow connection from Redlands village.		The treatment of the 'improved' Wanborough Road and design of the SCR and Redlands junctions, with Wanborough Road, will be detailed to maximise the attractiveness of the use of the SCR route to Redlands traffic and, to minimise the likelihood of traffic to rat-run through Wanborough village.

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29	Wanborough Parish Council	5	24	Page 24 - Redlands Village States average density of 40 dwellings per hectare, this does not agree with the Local Plan which states that density around the outskirts of the NEV will be reduced to reduce the impact on neighbouring villages, views from the AONB and surrounding countryside.		The adopted Local Plan requires a design led approach to housing density leading to an overall average density of 40 dwellings per hectare which responds to landscape and existing site conditions.
29	Wanborough Parish Council	6	24	Page 24 - Redlands Village - Approx. 300 - 400 dwellings, the percentage range is extremely high and more exact numbers need to be allocated to this area. This number is considerably higher than that recommended by the Planning Inspector.		As stated in the village proforma this is an approximate number of dwellings that could potentially be delivered at Redlands village. This will be subject to detailed site assessment through the development management process. With regards to the Inspector's Report on the examination of the Local Plan, the Inspector did not issue a modification to the effect of limiting the scale of development at Redlands.
29	Wanborough Parish Council	7	24	The map on page 24 shows a map with an access onto Wanborough Road, this is not detailed in the description under the detail for infrastructure needs.		Noted, the village proforma has been updated to reflect this.

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29	Wanborough Parish Council	8		The sum of money to prevent rat running through neighbouring villages needs to be quantified and include the whole of Wanborough Village.		The Local Plan stipulates that the New Eastern Villages development will provide measures to minimise rat-running through existing adjacent villages and east Swindon. These areas of concern include Wanborough and mitigation measures to avoid rat-running through this area will be considered. With regards to the sum of money required, this will be determined through development of the scheme.
29	Wanborough Parish Council	9		The NEV will result in additional pressures on facilities within Wanborough village, such as the Sports Facilities, Play Areas and Open Spaces. These facilities will be used by residents moving into the NEV especially when their facilities are not yet built, therefore provision should be included within the SPD to help towards the improvement of these facilities.		In accord with planning legislation, contributions can only be sought when they fulfil the statutory tests as set out in Section 2 of the SPD.
29	Wanborough Parish Council	10		Parish Council raises concern that there will not be sufficient funding for the road connections, plus bridges needed between development islands and this could result in areas such as Redlands Village being completely disconnected from the		The Village Proformas secure contributions towards 'Highway links between development islands' which aims to ensure accessibility between all development parcels.

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30	SBC (Conservation)	1	1	<p>I note the purpose of the NEVPO SPD, in particular noting it sets out SBC's approach to securing by planning obligations the infrastructure required as a consequence of developments in the NEV (para 1.6, draft SPD).</p> <p>My main consideration in the development of the NEV relates to heritage assets, designated or otherwise and the effects of development upon them. The county archaeologist, acting as archaeological advisor to SBC will respond separately to the draft on archaeological matters.</p> <p>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?</p>		<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.</p>

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30	SBC (Conservation)	2	1	<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.
30	SBC (Conservation)	3		<p>Application reference S/OUT/13/1555 – land north of the A420 in January 2014. In summary I advised;</p> <p>full identification (potential) and evaluation of heritage assets (designated or otherwise) has not been undertaken, as such the impact upon the historic environment not fully demonstrated. The opportunity to positively utilise such assets to inform the overall design and layout of the development, not taken.</p> <p>As such the development proposal is unable to demonstrate its sustainability with regard to the Historic Environment in accordance with the requirements of the NPPF.</p>		Noted.

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30	SBC (Conservation)	4	2	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.		Noted, the SPD comprises the Masterplan, IDP and village proformas.
30	SBC (Conservation)	5		Restatement of earlier consultation response and concern about setting of heritage assets (Manor Farm/Red House/Nightingale Farmhouse/Archaeological asset adjacent to Lotmead).		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.

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422	On behalf of the freehold owners of	1		Our clients are extremely concerned about the lack of consultation with them relating to the location of the new Southern Connector Route and canal through their land as shown in this consultation. Up until 1 month ago, Swindon Borough Council had not engaged with any of my 7 separate landowning clients about the route. Currently the shown indicative route for the Southern Connector Route and canal has taken no consideration regarding the future access to any of my clients land, in particular the landowners who I act for either side of The Marsh, Wanborough.		A landowner event was held in July at Steam and further consultation events are programmed. The Council is committed to early dialogue specifically with "SCR landowners". The Council accepts that access requirements need to be resolved. This level of detail will be considered as part of the detailed alignment/design process. Landowners, and appointed agents, will be fully consulted as part of the detailed draft SCR alignment(s) design process.

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422	On behalf of the freehold owners of	2		<p>We know that the current location of the routes simply does not work for our clients. We will need access for farming purposes off the Southern Connector Route and over the canal. With modern agriculture / equestrian businesses often deliveries of fertiliser, seeds, feed, and other agricultural products and outward movements of hay, silage, corn and animals are made with 44 tonne articulated lorries. So any bridges over the canal will have to be built to allow access for 44 tones articulated Lorries. Modern day combine harvesters are 11.6 metres wide and highly likely to become wider and grass forage harvesters are also require access gates which are at least 9 metres with the header on the front. The day of small farm machinery are no longer commercial.</p>		<p>Accommodation works to ensure that any land parcels severed by the SCR and canal will be provided with reasonable access provision, will form a constituent part of the overall design specification.</p> <p>All vehicle bridges will be designed to meet UK specification requirements and local demands including those arising from agriculture. Accommodation of the Canal is secured in policy as safeguarded land and no provisions for design and engineering have currently been made.</p>

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422	On behalf of the freehold owners of	3		<p>The current route of the canal bisects my clients' fields and has not been thought out practically in order to facilitate easy access to each landowners property. The canal clearly needs to be as close as possible to the A419 corridor with the Southern Connector Route on its eastern side. Despite this the design shows it the other way around with the canal created a moat which we will need to get over. Even then some fields will be severed so landowners who have land either side of the canal / Southern Connector Route will not be able to access their land. The design of the layout MUST allow for landowners to access</p>		<p>Unknown constraints prevent the development of a fixed SCR route at this stage and hence the alignment on the Masterplan is considered indicative only. All affected landowners will be engaged as the alignment becomes more fixed and access arrangements to land will be considered at that stage.</p>

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422	On behalf of the freehold owners of	4		<p>We note the Swindon Borough Councils comments about compulsory purchase. My clients would very much like to work with the Council to arrive at an acceptable resolution for them as landowners. But if Swindon Borough Council do not listen and push for a design which does not protect their long term agricultural access we will have no other option but to claim for substantial losses in the value of their land as well as requesting as is allowed for in Compulsory Purchase legislation for the correct Accommodation Works which will include multiple 44 tonnes bridges and a 10 metres access gateways to every severed parcel. This without doubt will cost considerably more than the figure budgeted for within this consultation.</p>		Noted.
422	On behalf of the freehold owners of	5		<p>In my clients view the canal is a complete 'folly' which is not needed, or required or practical. This is due to the extremely cost of accessing over the canal to land parcels, which has not been thought out. As such we strongly want to put our case across that the canal idea is removed completely. Added to this we believe the canal is not Community Infrastructure Levy compliant so we cannot see where the funding is coming from.</p>		<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. In the short term, the safeguarded route presents a recreational opportunity for walking, cycling and biodiversity gain.</p>

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422	On behalf of the freehold owners of	6		My clients have no issue with the Southern Connector Route principle but it needs to be located so that it minimises the amount of land parcels which are severed or makes the land severed commercially viable. Can we request that Swindon Borough Council and their highways consultants sit down with us regarding the route so they can understand each landowner's needs relating to access to their land off of the Southern Connector Route and over canal. Plus what the consequences of severing land will be for that farming / landowning business. The current route does not take into account such access and in my clients' mind is located in a far from ideal location.		Unknown constraints prevent the development of a fixed SCR route at this stage and hence the alignment on the Masterplan is considered indicative only. All affected landowners will be engaged as the alignment becomes more fixed and access arrangements to land will be considered at that stage.
422	On behalf of the freehold owners of	7		My clients also require that future access to their land for future uses, such as residential and commercial development are also considered in the design of the Southern Connector Route so that it is future proofed. Plus we need to discuss the location of land drains, ditch flows and farm water pipes.		Noted.

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422	On behalf of the freehold owners of	8		<p>Our objection to the location of the Southern Connector Route and the Canal in our view needs to be covered within the Eastern Development Villages SPD by clearly stating that this is yet to be agreed with the landowners, and is subject to negotiation with each landowning family. The threat of Compulsory Purchase in fact strengthens the rights of the landowners around The Marsh as the law allows us to insist that accommodation works to bridge, fences, gates, land drains, drainage, access, etc. are all provided. We would very much appreciate open dialogue regarding the canal and the Southern Connector Route with Swindon Borough Council rather than just be landed with an unthought-of out scheme. Currently the as drawn creates a severe problem due to non communication by Swindon Borough Council on this matter with the various landowners effected prior to publication of the draft SPD.</p>		<p>Unknown constraints prevent the development of a fixed SCR route at this stage and hence the alignment on the Masterplan is considered indicative only. All affected landowners will be engaged as the alignment becomes more fixed and access arrangements to land will be considered at that stage.</p>

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427	GWH Foundation Trust, Swindon C	1		<p>We want to focus on improving health and wellbeing, supporting people to live longer healthier lives independently and cater for the health and social needs of the local population, reducing the burden of ill health as well as developing mental resilience.</p> <p>The costs of non-recurrent (capital) and recurrent (service provision) infrastructure costs as a direct result of new housing developments are significant and widely recognised.</p> <p>Direct Cost of Acute Service Provision and Population Growth</p> <p>For the development outlined in the New Eastern Villages Planning Obligations Document and the Supplementary Planning Document, the direct cost of providing Acute Care Services in the current form of delivery, based on a population growth of 20,000 would equate to:</p> <ul style="list-style-type: none"> •An increased demand of 5.5% on the Planned Care Services £5,582,932 •An increased demand of 5.5% on the Emergency Services £6,472,203. <p>Equating to a direct cost to the acute trust of £12 million.</p>		<p>Unless directly related to development at the NEV there is no policy basis to secure contributions towards the GWH. Such evidence can inform the Local Plan Review in response to planned development at Swindon post 2026.</p>

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427	GWH Foundation Trust, Swindon C	2		The limiting factor is Hospital capacity and the ability to cope with the extra demand pressures. We have already established in a recent Demand & Capacity audit, that we will run out of maternity capacity within the next two years and we are aware that other services also face similar scenarios. Population growth without investment will compromise the delivery of high quality, safe service delivery, and this is particularly so given that the system is already under pressure.		Unless directly related to development at the NEV there is no policy basis to secure contributions towards the GWH. Such evidence can inform the Local Plan Review in response to planned development at Swindon post 2026.
427	GWH Foundation Trust, Swindon C	3		Great Western Hospital NHS Foundation Trust would like to see a new build environment which reduces the risks of falls, accidents inside and outside of new dwellings and enhances the well-being of individuals to live independently and happily in a community environment.		Unless directly related to development at the NEV there is no policy basis to secure contributions towards the GWH. Such evidence can inform the Local Plan Review in response to planned development at Swindon post 2026.

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427	GWH Foundation Trust, Swindon C	4		<p>The following are suggestions to consider:</p> <ul style="list-style-type: none"> • Build design which takes in to consideration walking and play surfaces which minimises harm and avoids accidental falls when inclement weather is present, surfaces in new play areas that minimise injury when robust play takes place. • Older peoples accommodation which takes consideration of Older People's needs in order to minimise accidents, such as showers instead of baths, lack of stairs and uneven surfaces, and spacious buildings which accommodate wheelchair access. • The development of space to accommodate and deliver healthy lifestyle services to facilitate and coach the likely number of inactive people, overweight people and smokers likely to live within the new developments and positively impact on reducing their cardiovascular risk factors such as Hypertension and Diabetes. • Developing space to accommodate healthy lifestyle advice could also be utilised to deliver ante natal care for pregnant women, deliver education and courses for breast feeding, parent craft and be utilised by the whole community for the well-being of families, regardless of age. This space 		Points noted.

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				could also provide a meeting area for older people to socialise, have coffee and develop as activity hubs.		
427	GWH Foundation Trust, Swindon C	5		<p>Great Western Hospital NHS Foundation Trust would specifically like to see the development of space to accommodate Primary Care facilities at scale within the new development, not only to deliver a full range of services normally delivered by the Swindon Clinical Commissioning Group but also:</p> <ul style="list-style-type: none"> • Increased space to enhance patient access and delivery of urgent care services within the community (rather than A&E) • To deliver interventions for people living with exacerbations of poor health due to a Long Term Condition crisis. • To develop small equipment stores to support residents to live independently, when activities of daily living are difficult without supportive equipment. • For health and community to live as one <p>Building the resilience of Primary Care Services will support the Acute Services to deliver more efficient, effective and economical services, if the demands are reduced on Hospital services through increased access to health and social care services in the community.</p>		Unless directly related to development at the NEV there is no policy basis to secure contributions towards the GWH. Such evidence can inform the Local Plan Review in response to planned development at Swindon post 2026.

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427	GWH Foundation Trust, Swindon C	6		Great Western Hospital would like to continue to be informed about the proposed phasing of the building development, so that it can work in partnership with the 'system', to anticipate surges of demand in order to proactively forward plan with the system.		Point noted.
427	GWH Foundation Trust, Swindon C	7		Great Western Hospital NHS Foundation Trust will need to further consider options for future service delivery of acute services in conjunction with our system wide partners to determine the most appropriate strategy for delivering additional health services in the area. This may include further development of the Great Western Hospital NHS Foundation Trust infrastructure, as outlined above.		Unless directly related to development at the NEV there is no policy basis to secure contributions towards the GWH. Such evidence can inform the Local Plan Review in response to planned development at Swindon post 2026.
427	GWH Foundation Trust, Swindon C	8		In conclusion, Great Western Hospital NHS Foundation Trust have an absolute need for investment to follow this planned population growth and increase of new dwellings within the area.		Unless directly related to development at the NEV there is no policy basis to secure contributions towards the GWH. Such evidence can inform the Local Plan Review in response to planned development at Swindon post 2026.

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427	GWH Foundation Trust, Swindon C	9		It is expected that Developer S106 contributions will be secured to support the delivery of additional secondary care services for the population growth expected from the development of new residential dwellings and the infrastructure development which will be required to support this delivery.		Unless directly related to development at the NEV there is no policy basis to secure contributions towards the GWH. Such evidence can inform the Local Plan Review in response to planned development at Swindon post 2026.

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427	GWH Foundation Trust, Swindon C	10		<p>Support statement from Public Health</p> <p>The above vision for health services in the New Eastern Village development is supported by Public Health and consistent with previous submissions from Public Health and Swindon NHS Clinical Commissioning Group. Providing local services that focus on prevention, and allow people to maintain independence and self-manage conditions whenever possible will create a community that will flourish. Promoting the health and well-being of NEV will benefit the whole of Swindon and reduce inequalities. It will create a community where people want to live throughout their life with buildings, services and a streetscape that is able to develop as the needs of people change. This will in turn reduce further demand on acute services, recognising the challenges outlined above. In addition to the proposals above, we would also encourage</p> <ul style="list-style-type: none"> -Promotion of NEV as a dementia friendly community from the start -The use of technology and tele health to create virtual consultations if appropriate -A focus on ageing well through good design - recognising that this also benefits anyone with a disability, children and the wider community 		Point noted.

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427	GWH Foundation Trust, Swindon C	11		A multi-agency group including GWHFT, Swindon NHS CCG, Public Health and Adult Social Care from Swindon Borough Council, AWP, SEQOL, Wiltshire and Swindon Local Enterprise Partnership, the Local Pharmaceutical Committee and Dorset and Wiltshire Fire and Rescue Service as well as Planning colleagues has been established. This welcomes the opportunity for ongoing involvement in the development of NEV to achieve the vision of an innovative, integrated, local and effective approach to prevention, health and social care.		Noted.