Send by email to forwardplanning@swindon.gov.uk , for the closing date of 6.00pm 21st February 2013.

F.A.O: The Planning Inspector,

Ref: Swindon Borough Council Local Plan 2026

Date: XXXXXX .

Dear Sir,

The public are asked to engage and give feedback on the Local Plan, which is difficult to do with a document which is 251 pages long, where the detail of maps is hard to read and the ability to access the 80 some separate documents online is cumbersome. The narrative is not targeted to the public and there is no mention of the Crystal Mark from the Plain English Campaign.

Nonetheless I have documented my concerns, which I have organised as follows:

* Summary
* Detailed Findings & Feedback
* Conclusions

I would be grateful if you would consider my submission within your assessment of Swindon Borough Council’s (SBC) Local Plan 2026.

Yours faithfully,

Name: XXXX

Address : XXXX

Contact Details : Email XXXXX Phone XXXX

**SUMMARY**

The plan does not propose an extension of SBC’s boundaries. The focus of the plan appears to be on building an additional 20,000 homes within the existing SBC boundary over the next 13 years. The Planning Inspectorate recently approved the Ridgeway Farm development on the border of Wiltshire County Council and SBC, rejecting SBC’s concerns over development on our borders, citing that SBC itself is developing to those same borders. Therefore development will encroach on existing boundaries and diminish open and green space.

SBC continues to support the building of district centres and out of town shopping areas which draw custom away from the Town Centre. Traffic congestion is already a concern across Swindon. SBC is in the process of divesting itself of investment in public transport.

The infrastructure to support these additional 20,000 homes and the > 80,000 existing homes is reliant upon a public transport model where the town centre is the hub. The transport proposal is based on walking, cycling and the introduction of a Rapid Transit Route where bus journeys will go to and from the Town Centre. The plan is reliant upon the existing congested road infrastructure to deliver highways access to a further 20,000 homes whether by bus or car.

Areas are named in accordance with Planners descriptions rather than names the public recognise, which can obfuscate the impact of proposals. Areas are inconsistently categorised and bear no relation to Ward Boundaries, localities or the local community. For open and green space, an area is in one category, to vote an area it is another, for school place planning yet another and to the Local Planning department an area is something else again.

There is no information in the public domain regarding the submissions of SBC’s 57 Councillors and Parish Councils’ regarding this Local Plan.

**DETAILED FINDINGS & FEEDBACK**

**Part 1:** **Introduction**

**1.19: ‘Ensuring a strong, healthy and just society’ ,**

**Feedback:** This plan should contain proposals as to how SBC plans to treat the public justly or to improve engagement and how this will be measured.

**1.19: ‘Creating sustainable communities’**

**Feedback:** SBC developments are frequently late and over budget and funded by government and S106 monies intended for other areas, SBC is poor at holding private developers to account. The plan should include an explanation as to how these concerns can be addressed.

**1.22: ‘A place where local people can have real influence and where they feel safe’ ,**

**Feedback:** SBC’s engagement with the public is poor. SBC decisions have been proven to have been made without due process or diligence. Public scrutiny of SBC proposals or decisions is unwelcomed. The £98,000 ‘Big Conversation’ garnered 17 responses. The plan contains no proposals for improving due diligence, encouraging public scrutiny or public engagement.

**1.22: ‘ We have safeguarded our environment for future generations’.**

**Feedback**: The plan should explain the meaning and intent of ’safeguarding’ and the definition of environment.

**1.24 : ‘Make full use of Swindon’s untapped resources, while better prioritising the Council’s spending’.**

**Feedback** : The plan should explain the meaning of ‘making full use of Swindon’s untapped resources’ and how the improvement of the prioritisation of Council Spending is to be measured , scrutinised and published.

**DETAILED FINDINGS & FEEDBACK**

**Part 3 : Sustainable Development**

This implies that developments provide infrastructure such as schools, doctors, parking, roads, public transport and open and green space within the boundaries of the development and that adequate funds are agreed with developers to do so and that these funds are used in the local area to mitigate the impact of a local development.. Examples where this has not happened are : Angel Ridge, Marlborough Park, Wichelstowe, North Swindon, Tadpole Farm.

Where the Local Authority is the developer or the land owner, they must adhere to the same standards expected of Private Developers. Examples where this has not happened are: The Croft School, Pickards Field, Mouldon Hill School Proposal.

**Feedback:** The plan should explain how SBC proposes to enforce developer agreements and also how SBC, as the developer, intends to be open, transparent and accountable to the public.

**DETAILED FINDINGS & FEEDBACK**

**Theme 4: Policy TR1 : Sustainable Transport Networks**

The traffic network across Swindon has difficulty coping with existing traffic at peak times throughout the week. Public Transport has been privatised and the remaining SBC investment is in the process of ending. Bus routes are being cut across Swindon and the current strategy appears to be that most journeys will include changing buses in the town centre bus station. Travelling across Swindon by public transport is time consuming. Officers have reported that 20% of traffic at peak times is related to journeys to school. The decision to build schools outside of the areas of need can only increase traffic. Much of Swindon’s employment comes from the car industry and a forest of car showrooms continue to be developed across West Swindon.

Concerns on increased traffic are dismissed by Officers who promote the idea that the public will walk or cycle and that car traffic is low. The local plan continues on this theme which is based on reducing the need to travel. Independent transport experts question the data used by Officers to recommend approval of planning applications.

The Local Plan proposes a Rapid Transit Route for Buses within the existing road network across Swindon which would give priority to buses over cars on both the road and at traffic lights. It was stated at the June 2012 Tadpole Farm Planning Committee that the Department of Transport had already rejected a Rapid Transit Route for Swindon.

The installation of Traffic Lights to prioritise buses at the intersection of Croft Road, Devizes Road and Newport Street in Old Town created gridlock and after a public campaign, supported by Ward Councillors, were removed and the roundabout re-instated.

This Rapid Transit Route proposal depends on the use of Marlborough Road , Pipers Way and Croft Road in Old Town. All routes heavily congested even before the remaining 4000 homes in Wichelstowe are built.

For a LA which is divesting itself of involvement in Public Transport which it believes is not cost effective to deliver a Local Plan advocating that the residents of an additional 20,000 homes will walk , cycle or catch a bus to the town centre and then to wherever they work/go to school/volunteer/ then return home is unsound and contradictory. To suggest this Rapid Transit Route can exist within the existing road infrastructure is ridiculous. Rather than encourage employers to Swindon it may well drive them to look elsewhere.

SBC dismisses public and parish council concerns over the impact of development to the Swindon road infrastructure. The Lead Member for Transport recently stated to the Press that Ridgeway Farm‘s 700 homes will each generate 2 cars. This is inconsistent with Officers’ advice on the 1700 home Tadpole Farm approval.

**Feedback** : This plan contains little information regarding expansion of rail travel. This plan does not recognise that the existing road infrastructure is inadequate for the >80,000 homes which already exist. This transport proposal is ill thought out, inconsistent , unfunded and unworkable within the current infrastructure. It is unsound and should be deferred until SBC is able to present a workable, funded and deliverable Transport infrastructure plan across road and rail, for the management of current and future traffic volumes created by an additional 20,000 homes which will stand the test of public and Councillor scrutiny.

**DETAILED FINDINGS & FEEDBACK**

**Theme 5; Infrastructure Needs: Policy IN1 : Infrastructure Provision**

‘Mitigate the impact of development on existing infrastructure’.

SBC’s own evidence demonstrates that School Place Planning is influenced by factors other than the location of developments and the location of the children as evidenced by monies sought for North Swindon but allocated to Old Town. Example : SBC broke ground on the Croft School in the knowledge it was surplus and that the need was and continues to be in North Swindon.

In the North Swindon, 1700 Home Tadpole Farm development, approved in June 2012, Officers made no provision for the education of children from the 1st 564 homes. In response to public and Parish Council concerns over increased traffic Officers stated that ‘people have cars, people buy cars and people keep those cars on their drives’. Officers stated that Tadpole Farm traffic would be mitigated by the introduction of Rapid Bus Transit, an unfunded proposal already rejected by the Department of Transport. The Lead Member for Transport has recently been in the Local Press with concerns that a proposed development within Wiltshire County Council, 700 homes at Ridgeway Farm, which borders Swindon, will generate 2 Cars per household on the same roads which Tadpole Farm will use.

Officers decided to build a school within the Croft based on a £389 study saying the site had excellent access. Officers advised the Planning Committee to dismiss resident funded expert advice re access concerns. The school opened in September 2012 with £500,000 allocated for mitigation which has already resulted in a loss of amenity to local residents. Officers are unable to explain full mitigation proposals and have blighted the local area. The School is already raising concerns regarding safety of access.

**Feedback**: This plan should provide proposals to ensure due diligence and consistency in the provision of infrastructure on any and all applications presented to SBC from either the private or the public sector.

**DETAILED FINDINGS & FEEDBACK**

**Theme 7 : Natural and Built Environment**

**Key evidence for Theme 7:**

The reports are out of date, do not reflect the current population or the 2011 Census or incorporate the proposed developments of > 20,000 homes, nor do they reflect the May 2012 Ward Boundary Commission changes.

**Feedback**: National Planning Policy Framework, seeks to promote healthy communities and says existing open space can only be built on if an assessment has been undertaken that shows it is surplus to requirements, or the loss would be replaced by an equivalent or better provision in terms of quantity and quality in a suitable location, or the development is for alternative sports or recreation provision, the needs for which clearly outweighs the loss. This assessment should reflect the needs of the current population and predicted population of 2026

**Policy EN3 : Open and Green Space**

Swindon’s population is growing and the 2011 Census states it to be ~ 209,000. This Local Plan supposes that an additional 20,000 homes will be built within the existing SBC boundaries by 2026.

The Swindon Borough Open Space Audit and Assessment Review (2011) is based on 2006 data which showed a total population of ~201,000 .This same review also relies on 2006 Ward boundaries. For example the Old Town and Lawn Ward of 2006 became the Old Town Ward in May 2012.

Calculations of open and green space per capita and whether SBC deem there to be excess provision by Ward are based on the population of 2006 in the 2006 Wards. SBC makes no information available to the public as to which open and green spaces are at risk of development but states that excess provision may be developed at a time of SBC’s choosing for a purpose of SBC’s choosing. Examples of this include: The Croft, Pickards Field, Mouldon Hill Country Park.

**Feedback:** The public may not challenge the location of a development on open and green public space until a Planning Application has been submitted. Where SBC is the developer and the applicant, the public are informed that the location of a development is not a material planning condition. The plan makes no recommendations to be open and transparent in the management of and plans for public open and green space.

**4.341 ‘In exceptional circumstances the wider community benefits of the development ,such as a school or a community centre, may outweigh the loss of open space’.**

**Feedback** : The plan offers no explanation of ‘exceptional circumstances’. It would therefore appear reasonable to determine the all open and green space is at risk from the LA. Example:

1. How can the residents of Old Town be assured that the remainder of the Croft Playing fields will be safe from SBC sale or SBC Development? Or the Marlborough Road/Marlborough Lane Railway Embankment? Or indeed that Lawn Woods are safe for future generations?
2. The proposal to build a primary school within Mouldon Hill Country Park risks all Country Parks being open to development within their boundaries and risks challenge by developers. There is already evidence that SBC’s decision to build up to our boundaries was quoted by the Inspector at the Ridgeway Farm Inquiry as no reason to complain about a WCC development on the SBC boundary.

**Feedback :** This plan is disingenuous as it pretends that the public have influence over open and green space where SBC is the owner or the developer. This plan is flawed as it does not recognise current boundaries or population or the needs of an additional 20,000 homes. This plan should offer mechanisms to safeguard our environment for either current or future generations. This plan should provide open and transparent, public information regarding open space under risk of SBC development.

**DETAILED FINDINGS & FEEDBACK**

**Policy EN8 :Unstable Land**

Open and green space can be situated on what has been deemed to be land unsuitable for development, for example on or near flood plains or natural springs or on slopes.

The Local Plan sets out SBC’s expectations and the responsibilities of Private Developers in their assessment of and plans to manage development of unstable land. SBC does not apply these same criteria to SBC Developments. Examples include:

 (1)Croft School, where preparation of the site required 3 sets of foundations, has caused budget overruns and contributed to a 6 month delay in completion

 (2) Cabinet approved the proposal to build a school within Mouldon Hill Country Park where the site viability is unknown and the proposed cost of site development is unknown ,

The Lead Member for Schools) stated to full Council in January 2013 that any proposal is viable if you have the money. Irrespective of the economic climate SBC has the responsibility to ensure that decisions are evidenced based and cost effective.

Feedback**:** This Plan should specify the expectations of SBC acting as the developer to **better prioritise the Council’s spending( reference 1.24 ) ad provide an economic viability test for general and public scrutiny. U**nstable land not used for building should be classed as land for biodiversity/geodiversity but not counted for open space.

**DETAILED FINDINGS & FEEDBACK**

**Strategic Policies: Policy NC1 : Wichelstowe**

 **b. ‘a secondary school ( or contributions towards the delivery of a 6 forms of entry off site)’.**

As Wichelstowe already has provision for 3 Primary Schools and a Secondary school within the development and extant planning permission there is no reason to build this school off site. The plan should be amended accordingly.

**Feedback**: The plan should include: All developments will be scrutinised for their sustainability and comments from members of the public will be fully taken into account. Developments undertaken by SBC as landowner will be particularly carefully scrutinised. Community Infrastructure Levy agreements should be open to the public if legally possible. Where a development has been agreed in principle and the development is sold on to other developers, SBC should ensure that infrastructure agreements are maintained, applied and made public.

**DETAILED FINDINGS & FEEDBACK**

**Local Plan Maps**

Old Town is designated as part of the Central Area. There is no explanation as to the implications of this to the public.

**Feedback** :The plan should explain the implications of this designation in employment, retail and residential terms

The Allotment process as managed by SBC is complex and it is difficult for the public to manage. Allotment land is not designated on the Local Plan Maps. The statements:

**1.24 : ‘Make full use of Swindon’s untapped resources, and 4.341 ‘In exceptional circumstances the wider community benefits of the development ,such as a school or a community centre, may outweigh the loss of open space’.**

Raise concerns about safeguarding this environment for current and future generations.

**Feedback:** The plan should show Allotments as a designated category.

The legend describing the designation of land does not explain ‘white’ space’. Land shown as ‘white space’ includes the Broome Manor Municipal Golf Course and the Field which separates Croft Road from Wichelstowe. There are further examples around Wroughton,

**Feedback :** This plan should provide an appropriate designation of this ‘white space’ as to do otherwise leaves this land open to development and will risk the amenity of current and future generations. That the Broome Manor Golf Course is LA land is a further concern given the open and green space policy of this Council.

**CONCLUSIONS**

I believe the Local Plan 2026 is unsound for the following reasons:

1. This plan does not propose an extension to Swindon’s boundaries therefore the total land area is fixed.
2. This plan does not address the conflicting objectives of a 5 year land supply, an additional 20,000 homes and the need for open and green space within these fixed boundaries.
3. Continuing to build towards Swindon’s boundaries risks challenges from developments encroaching on the surrounding areas.
4. This plan does not recognise that an additional 20,000 homes will create the need for more open and green space for the health and benefit of the community.
5. This plan is based on a vibrant Town Centre as the hub for transport activity. It does not recognise the Town Centre is no longer the only destination of choice for the public and the attraction of district and out of town shopping. This plan is flawed in that it relies upon a transport strategy which does not recognise the growth and use of district and out of town centres.
6. As a Local Authority, Swindon is dependent upon the car for transport and has 2 main employers, car manufactures Honda and BMW , yet it proposes a transport strategy based on the premise of discouraging car traffic. The plan offers no alternative transport strategy to a Rapid Bus Transit to operate within the existing congested road network. It does not incorporate the main rail links. The transport strategy for 2026 is contradictory.
7. The plan aims to reach the highest target for employment and yet offers no realistic transport strategy to support this. SBC is withdrawing financial support for public transport as it states it is not economically viable. To base a transport strategy on a service which SBC itself does not support as viable is contradictory.
8. This plan is focused on the building of yet more homes in a town where existing developments remain unfinished, lack agreed amenities and where homes remain unsold.
9. SBC is inconsistent in its determination and provision of infrastructure needs. This inconsistency is apparent between Local Authority and Private Developments as well as across Private Development.
10. Public engagement on developments is dismissed when engagement identifies concerns on the infrastructure to support such developments in terms of employment, utilities, schools and highways. SBC does not hold developers to account on behalf of the public.
11. Where SBC is the developer, engagement with the public is poor , projects are undertaken without the completion of due diligence , sustainability concerns are dismissed and budgets are poorly managed..
12. Open and public green space is seen as an opportunity to build schools rather than building these within the developments which triggered the need. The proposal to develop on unstable land further risks open and green space as does the designation of ‘white space’.
13. Fixed boundaries raise concern on the safety and provision of open and green public space and the failure to categorise white space raises concerns over further development.
14. It offers no safeguarding of Swindon for future generations , rather it brings a vision of further unfinished developments, poor transport infrastructure , gridlock , employment limitations , an anachronistic Town centre, families travelling distances to schools and little open and green public space. Too much is left open to the interpretation of the Council.
15. SBC is already in serious debt. This plan offers no reassurance that tax payer funds will be better prioritised.
16. This plan will influence Swindon for generations to come and yet the process by which Swindon Borough Council seeks public engagement on this critical document is cumbersome, passive and suggests proscriptive feedback forms which, it could be suggested, are designed to intimidate the public.
17. Residents are asked by Swindon Borough Council whether they believe the Local Plan document to be legally compliant or compliant with National Planning Policy. I believe that the knowledge and authority to determine this rests with the Planning Inspector.