

REPORT OF THE DEPUTY DIRECTOR (PLANNING AND COMMUNITY STRATEGY)
TO THE STRATEGIC AND LOCAL PLANNING ADVISORY GROUP 26 JUNE 2006
AND TO THE EXECUTIVE ON 7 JULY 2006

The Draft Regional Spatial Strategy for the South West 2006 - 2026

1.0 Introduction and Report Summary

- 1.1 The draft Regional Spatial Strategy for the South West, (the South West Plan) has been published for consultation purposes. The document looks ahead to 2026, and will supersede the current Regional Planning Guidance for the South West (RPG10). Although the Vale is not in the South West, the Vale's western boundary is co-terminous with part of the south west's regional boundary. Although in the area covered by the South West Plan, the town of Swindon is just 'over the border' and therefore policies in the South West Plan relating to the Borough and its surrounding area are of particular significance to this Council.
- 1.2 The documents published for consultation include; the draft Regional Spatial Strategy itself, an Implementation Plan; a Strategic Sustainability Assessment; and a Pre-Submission Consultation Statement.
- 1.3 These documents are currently held in the Planning Strategy team. Please contact Nick Burroughs or Katie Barrett if you wish to inspect them.
- 1.4 The consultation period runs from 6 June to 30 August 2006.
- 1.5 In summary, Swindon is identified in the South West Plan as one of 21 'Strategically Significant Cities and Towns'. Relevant policies are included to, among other things; realise and develop the role of Swindon as a service and employment centre providing a high quality lifestyle for residents within and adjoining the town (SR1), ensure that social, cultural and educational requirements for the Swindon sub-region are provided for (SR7), maximise economic opportunities within the Swindon travel to work area (SR8), make the best use of land for development by the provision of a strategic urban extension on the eastern side of Swindon to the north and south of the A420 (SR9).
- 1.6 This report summarises key elements of the proposed strategy and outlines suggested responses to the South West Regional Assembly.
- 1.7 The Contact Officer for this report is Nick Burroughs, Planning Strategy team, tel. 01235 520202 extn 496.

2.0 Recommendations

- 2.1 *It is recommended that the Strategic and Local Plan Advisory Group recommends the Executive to make representations on the South West Plan set out as comments in bold in Section 4 of this report.*

3.0 Relationship with the Council's Vision, Strategies and Policies

- 3.1 This report complies with the Council's vision and aims. The South West Plan does not cover the Vale but could affect it and it will be important to keep the strategy under review because of the proximity of the major growth area of Swindon and its potential impact on the Vale's western parishes.

4.0 **The Main Features of the draft Plan with the Officer's comments**

General

- 4.1 The draft Spatial Strategy for the South West, (the South West Plan), looks ahead to 2026. It has been prepared by the South West Regional Assembly. It is one of the new kind of strategy documents, both spatial and functional, responding to the Government's challenge to build sustainable development. It will supersede the Regional Planning Guidance for the South West (RPG10) which looked ahead to 2016.

The Spatial Strategy

- 4.2 Although the Vale is not in the South West region, the Vale's western boundary is co-terminous with Swindon Borough, which is covered by the South West Plan. Swindon is identified in the South West Plan as one of 21 'Strategically Significant Cities and Towns' (SSCTs). Paragraph 3.1.3 sets out and Map 3.1 shows the 'Spatial Strategy Statement' which explains that the emphasis of the strategy will vary to include realising the economic and other potential of the SSCTs particularly in the north (eg. Swindon) and centre of the region. Paragraph 3.3.3 explains that relevant strategies for the SSCTs are included in Section 4 and will among other things, seek to make the best use of land for development by the provision of urban extensions.
- 4.3 Comment. The South West Plan's strategy to realise the economic and other potentials in the north of the region, and particularly with regard to Swindon, is noted and should be supported in principle, given the importance of Swindon as a major source of employment and services for residents in the western part of the Vale.

Sub-region - Swindon

- 4.4 In Section 4, paragraph 4.2.2 emphasises the economic potential of Swindon – "another potential national growth centre, although...potential water supply and waste treatment issues will need to be taken into account". Paragraph 4.2.1 notes that the realisation of this potential will require, among other things, "the provision of sufficient housing linked with job growth at the named places" and should be complemented by allowing balanced development elsewhere to ensure the service role of the market towns is maintained. Policy SR1 confirms this approach.
- 4.5 Comment. See para 4.3 above. The reference to allowing balanced development elsewhere to ensure the service role of market towns is maintained should be welcomed as this is consistent with this Council's approach in the Local Plan 2011, particularly in relation to Faringdon.

Policy SR7

- 4.6 Paragraph 4.2.26 introduces and policy SR7 covers the role of Swindon in providing a high quality lifestyle for residents within and adjoining the town.
- 4.7 Comment. Policy SR7 is noted and should be supported for the reasons given in paragraph 4.3.

Policies SR8 & SR9

- 4.8 Paragraph 4.2.27 introduces and Policies SR8 and SR9 cover development at Swindon and specifically include a strategic urban extension on the eastern side of the town to the north and south of the A420. This expansion area is shown diagrammatically as 'Area of Search G' in Inset Diagram 4.2, (see Appendix A to this report). The policies and the Inset diagram indicate that this strategic eastern extension is for about 12,000 dwellings at a proposed rate of development of 600 dwellings per year. Policies SR8 and SR9 also set out the scales of development for the Swindon area. These are summarised in the table below.

- 4.9 These figures have been informed by the technical work carried out by the strategic authorities and the views of a Joint Strategy Group involving representatives from Swindon and its surrounding authorities, including the Vale and Oxfordshire County Council. It would not be practical to go over this technical work in any detail in this report. However, it may be helpful if some of the main 'numbers' and their contexts are considered further.

Swindon	SW Plan Proposed Dwellings nos. built per annum	SW Plan Proposed Dwellings Total nos. 2006 - 26
Urban area	950	19,000
Eastern Area	600	12,000
Small scale urban extensions	100	2,000
Rest of Borough	50	1,000
Urban extension into North Wilts	50	1,000
Total Swindon Area	1750	35,000

- 4.10 The South West Plan proposes that an average of 1,750 dwellings per year be built within and adjoining the urban area of Swindon up to 2026, to provide some 35,000 dwellings in total over the 20 year period. Reference to the table also shows the sub totals of dwellings that are proposed within and adjoining the Swindon area. Further comment on these sub totals is made in para 4.20 below.
- 4.11 As part of the preparatory work for the spatial strategy and on the Regional Assembly's behalf, the Swindon Joint Strategy Group undertook a sub-regional study for Swindon. After careful consideration the Joint Strategy Group's recommendations included a growth figure of 16,000 dwellings for the period 2016 to 2026. Taking into account the housing provision proposed for Swindon in the Structure Plan 2016, this recommended figure of 16,000 dwellings equated to a total figure of 32,000 dwellings over the period 2006 to 2026.
- 4.12 The draft South West Plan appears, therefore, to have effectively increased the housing provision from 32,000 to 35,000 – an increase of just over 10% - without any real justification or explanation. This is in the context of the Joint Strategy Group's extensive and detailed work in assessing and evaluating a number of growth options, and the serious concerns which emerged as part of that work relating in particular to service and infrastructure requirements and provision, eg water supply, highway improvements and the availability of sewage treatment capacity. It should be noted that some of these matters have been identified as potential issues in the South West Plan (referred to in para 4.4 above) although this appears to have not been reflected in the proposed higher level of growth the Assembly is consulting on.
- 4.13 The proposed level of growth of 35,000 dwellings to 2026 is the total which derives from the dwellings' provision in policy SR8. The policy notes that "investment will be made in key infrastructure to enable the achievement of the development". The draft Strategy has already identified that there are potential water supply and waste treatment issues (see para 4.4 above). These issues are considered to be so important that this reference in the policy should be strengthened to make the development proposed dependent on the key infrastructure being provided (rather than the rather weak statement that investment will be made to enable the achievement of development).
- 4.14 Comment. The Vale Council objects to policy SR8 on the basis that (i) the proposed scale of development at Swindon is excessive having regard to the serious concerns that exist in relation to infrastructure provision to support growth as proposed and, (ii) the policy should be strengthened to make the development proposed dependent on the key infrastructure being

provided and that its provision should be timely in order to co-ordinate new development with the infrastructure it demands.

- 4.15 Reference to para 4.8 above and the table in para 4.9 shows proposed dwelling build rates for the Swindon area in the period to 2026. For the borough as a whole, the rate is 1,750 dwellings per annum. Reference to the adopted Structure Plan 2016 (Section 3, see Appendix B) shows that between 1978 – 2003, the average build rate in the Borough was 1,100 dpa, having dropped to some 800 dpa in the latter period 1996 – 2003 and that from 2003 a build rate of over 1,500 dpa “will need to be sustained” (to achieve Structure Plan requirements 2016).
- 4.16 Additionally, the table shows a build rate for the proposed eastern area of 600 dwellings per annum. It is interesting to note that the Panel Report into the Structure Plan 2016 (see Appendix C) referred at para 3.29 to housing completions in the Swindon Area. A companion table set out average completions on strategic and other major sites, such as the Western Development Area (WDA), the Northern Development Area (NDA) and the Southern Development Area (SDA). The Panel concluded in para 3.29 that the table demonstrates that it would be reasonable to assume an output from a new major source of development of about 400dpa. Assuming that any development on the eastern area realistically commences in, say, 2010 then this would represent a required build rate of around 750 dpa for the remainder of the period to achieve the outcome now desired by the Spatial Strategy.
- 4.17 The South West Plan’s build rate of 1,750 dpa for the Swindon area and a build rate of 600dpa – possibly rising to 750 dpa - for the eastern area would appear to be very optimistic when compared to historical rates and yet these forecast rates have been included in policy SR8 without any real justification or explanation. If the actual build rate for the eastern area falls short of the forecast rate then this could have significant implications for the draft strategy. Over the plan period, the eastern area housing shortfall could amount to some 4000 dwellings (the difference between rates of 600 and 400 dpa over 20 years). This is a third (and could be more) of the eastern area total of 12000 dwellings and such a shortfall could adversely affect the integrity and proper planning of the strategic eastern expansion. Moreover, as the strategy will become part of the development plan any shortfall in the delivery of housing numbers may encourage developers to make planning applications on sites not supported by the development plan but where the argument to allow would be to ‘make up’ for housing numbers not coming forward on the eastern area. Such a situation would not result in the proper planning of the area.
- 4.18 Comment. The Vale Council objects to policies SR8 and SR9 on the basis that the figure of 12000 dwellings proposed for the eastern urban extension is unrealistic and unlikely to be achieved and therefore runs the risk of damaging the strategy and leading to planning by appeal.
- 4.19 Reference to paragraphs 4.11 and 4.12 above explains that the Joint Strategy Group had recommended a growth figure which the Assembly has effectively increased by 3000 dwellings. A reduction in the eastern area total by 3000 to 9000 dwellings would mathematically produce a build rate over the plan period of 450 dwellings per annum. This is much more realistic, see para 4.16 above, as the reasonable build rate from a new major source of development.
- 4.20 The table at para 4.8 above also sets out sub totals for dwelling provision figures within and adjoining Swindon listing, for example, smaller scale urban expansions within the borough and adjacent to the urban area in North Wiltshire District Council. No further detail is given on what these various areas might comprise. However, your officers consider that the potential for growth in the form of urban extensions around the town may be greater than the 3,000 dwellings total set out in the table (2000 plus 1000 dws). Such growth could face local opposition and would need further assessment but might not necessarily perform less favourably when compared with the strategic growth to the east. Should the potential for these smaller scale urban extensions be greater than described in the strategy, then there could be a further reciprocal reduction in the total proposed for the eastern area. For example, if this potential was of the order of an additional 1000 dwellings, then the eastern area total in the period to 2026 would be cumulatively reduced to an additional 8000 dwellings. This would mathematically produce a build rate over the plan

period of 400 dpa which, as described in para 4.16 above, is the rate the Structure Plan Panel considered could reasonably be expected.

- 4.21 Comment. The Vale Council objects to policy SR8 on the basis that the required provision of the additional dwellings in and around the Swindon area in the period to 2026 does not reflect a distribution of development which is consistent with the likely development potential of sites on the periphery of the town.

Inset Diagram 4.2 Swindon

- 4.22 This diagram (see appendix A) shows the area of search for the location of the eastern expansion of Swindon for 12,000 dwellings. This area is south and north of the A420. To the north the area is between the A420 and the A361. This area, however, is already taken up by what are listed in the Swindon Borough Local Plan Table 3 as key employment areas; South Marston Airfield (138 ha) which includes the Honda factory, South Marston Park industrial estate (93 ha), Keypoint (24 ha) which the borough plan protects as a rail freight distribution complex and also the village of South Marston. In this context and at a rough calculation only approximately half this northern search area is undeveloped land. Development in this area would also seem to be undesirable as it is likely to lead to coalescence with the settlement of South Marston and be located in close proximity to these major employment areas. While the area and timescale of the proposed eastern area would not rule out development to the north of the A420, diagram 4.2 would seem to be misleading in that it suggests that the whole of this area is an area of search. Moreover, this area, east of the A419 and north of the A420, was considered with other sites in Swindon's Council's Principal Urban Area Study. This study assessed areas adjacent to the Swindon built-up area as good, fair or poor, and concluded, among other things, that the performance of this area was 'poor'.

- 4.23 Comment. The Vale Council objects to policy SR8 and Inset diagram 4.2 Swindon on the basis that the area of search shown on inset diagram 4.2 for the location of 12,000 dwellings is misleading because only half the area of search to the north of the A420 could be considered to be realistically available for major housing development.

Employment

- 4.24 The strategy notes at para 4.2.25 that jobs in the Swindon 'travel to work area' (TTWA) are projected to increase by about 26,000 to 32,000 jobs. However, while para 8.3.1 states that 'a ready supply of sites ... in suitable locations is fundamental to the continued economic performance of the region' and para 8.3.4 explains that an ODPM note provides guidance on the translation of forecasts to land requirements, the strategy clarifies in policies E1 and E2 that at towns like Swindon (an SSCT) local development documents (LDDs) will provide sufficient sites to accommodate the numbers of jobs identified for each SSCT. The land requirement implications of an additional 6000 jobs would seem to be something on which the regional strategy should provide guidance if the strategy's aim of balancing the provision of jobs with housing (para. 4.2.25) is to be achieved.
- 4.25 Comment. The Vale Council objects to policy E2 on the basis that there should be more policy guidance to assist the strategy's aim of balancing housing and jobs.

Surrounding Settlements

- 4.26 Paragraph 4.2.30 notes that surrounding settlements (not named) play important roles in relation to Swindon and as smaller scale balanced, sustainable communities, and other named settlements perform a largely dormitory function to Swindon. Faringdon is not named presumably because it lies outside the region. Paragraph 4.2.25 explains that realising Swindon's economic potential and balancing the provision of housing and jobs will be critical in creating more sustainable development and travel patterns, reducing the overall levels of in-commuting from rural communities, including from the Vale in the South East Region.

Comment Noted.

Strategic Gaps

- 4.27 Para 4.2.30 requires Swindon Borough to work with neighbouring local authorities to identify strategic gaps in their local development documents, to ensure that settlements surrounding the town do not coalesce with Swindon's built up areas, ie this issue is addressed in the text and not in a policy. It also seems to relate to neighbouring towns like Highworth and Wroughton rather than neighbouring villages. The point is made that this is an issue that will be progressed through the appropriate local development document. However, given the scale of the eastern area, and the implications such a large development may have on its immediate area, officers believe this is an issue which should be covered by a specific policy in the strategy.
- 4.28 It is noted, for example, that policy SR16 dealing with an urban extension at Exeter not only seeks a high quality of life through standards of design but that the urban extension should protect and maintain environmental assets, maximise the landscape setting and avoid areas susceptible to flooding. These are all issues which apply to the eastern area. In fact the River Ray floodplain, which lies in the eastern area, is specifically mentioned as a characteristic of the area likely to be significantly affected by the strategy, see para 4.45 below. All these policy matters should be mentioned accordingly.
- 4.29 Comment. The Vale Council objects to the omission of a policy context for the Swindon area which specifically addresses the identification of strategic gaps and requires the strategic eastern development to protect and maintain environmental assets, maximise the landscape setting and avoid areas susceptible to flooding.

Key Infrastructure

- 4.30 The strategy recognises at paragraph 3.6.7 that the delivery of key infrastructure is a pressing concern across the region. Paragraph 4.2.31 lists key infrastructure for Swindon and this includes a new reservoir (Upper Thames Reservoir) in the South East Region. Additionally paragraph 3.6.7 comments that in some cases the scale of development 'implies a step change in delivery rates' and that the development industry must play a full role in insuring that supporting infrastructure is in phase with development. Development Policy D expects co-operation between bodies across administrative boundaries to ensure development contributes to the cost of necessary infrastructure and the establishment of forward funding mechanisms.
- 4.31 Comment. The Vale Council objects to the reference in para 4.2.31 to a new reservoir on the basis that Thames Water has yet to formally bring forward a reservoir proposal and that such a reservoir proposal has yet to be shown to be justified on technical, economic, environmental and planning grounds. This reference to the Upper Thames reservoir is therefore premature and potentially misleading.
- 4.32 The strategy shows the proposed 12,000 dwellings to the east of the A419 in a diagrammatic fashion. The detail of this housing will properly be developed through the appropriate local development document. However, local circumstances suggest that the vehicular access to this site will be from the A420 and that this will significantly increase the number of vehicles using the A420. While the A420 may technically be able to carry this additional traffic or be suitably improved if necessary, this is a matter of local concern and an acknowledgement that this is an issue that should be addressed would be welcome.
- 4.33 Comment. The Regional Assembly should be informed that the highway improvements that will be required to access and serve the eastern development area should be listed as an issue of key infrastructure in para 4.2.31 including an acknowledgement of the implications for the existing A420 within the Vale.

Housing Market Areas

- 4.34 Section 4.5 addresses housing distribution to housing market areas. Map 4.2 shows indicatively the location and extent of the sub-regional housing markets. The sub-regional housing market centred on Swindon appears to extend eastwards over the regional border into the south east region. Policy HD2 comments that local planning authorities will carry out joint working in assessing housing needs in housing market areas that transcend authorities' boundaries. Reference to the draft SE Plan shows in Map H6 the Swindon sub-regional housing market extending into the Vale and para 1.9.2 notes that housing markets do not fit neatly into local authority boundaries.

Comment. Noted

Transport

- 4.35 Section 5.3 of the Spatial Strategy is sub-titled 'Strategic Transport Links to the South West'. In summary, paragraph 5.3.3 notes that if the economic potential of the region is to be realised it will be essential to ensure the strategic links between the region and the rest of the UK (and wider markets) are improved. The inter-regional road network is then described. The M4 is listed as the route to London, ie into the south east region. The A417/A419 is listed as the route to the West Midlands. Paragraph 5.5.2 looks at regionally significant road routes. These are the major transport routes connecting the major urban areas within the region and the primary arteries for long distance inter-regional traffic. No mention is made of the A420 from Swindon to Oxford in either category.
- 4.36 Reference to the draft South East Plan (Section D4, para. 1.16) (see Appendix B to this report) notes that in order that the full potential of regional hubs (eg. Oxford) might be realised, they must be supported by a network of regional spokes, policy T3 and map T2 refer. Reference to map T2 shows diagrammatically that there is a regional spoke from Oxford towards Swindon. The road from Oxford to Swindon is the A420. As described in para 4.33 above, the A420 is not identified as having any particular planning policy status. There would therefore appear to be no 'matching' designation for that section of the A420 road in the South West Plan.
- 4.37 Additionally, the South East Plan shows diagrammatically in map T2 that from Oxford an international and inter-regional corridor leads north easterly past Milton Keynes and into the adjoining region. The South West Plan seeks to ensure that the strategic links between the region and the rest of the UK (and wider markets) are improved (see para 4.33 above). The logical route from the Swindon area into the Milton Keynes/South Midlands growth area (see Section B, Map B2) is along the A420 to Oxford. Policy TR4 requires the trunk road network to be managed to ensure it performs its strategic function.
- 4.38 This would appear to suggest a lack of consistency in the planning approach between the two regions. However, the difference in policy approach to the role of the A420 may reflect the differences in attitude that the regional bodies take to these matters but for the benefit of the general public this inconsistency in the planning approach between the two regions should be explained and clarified.
- 4.39 Comment. The Regional Assembly should be informed that for reasons of clarity and comprehension, the strategy's regional transport network should be consistent with the adjoining south east region, and therefore include appropriate references to the A420.

Implementation Plan

- 4.40 The Implementation Plan explains at para 1.1.1 that it provides the coordination and targeted focus that is required to ensure that the draft regional spatial strategy is translated into action. The basic format of the document is a summary of the key actions against delivery strategies and mechanisms, sources of funding, key infrastructure and timescales for delivery. To the extent

that it sets these matters out, it should assist the coordination and timely delivery of the desired outcomes of the strategy.

- 4.41 In the section on Policies SR7 to SR9 at Swindon, the key infrastructure required includes “a new reservoir (Upper Thames reservoir) in the South East Region”. This matter has already been addressed at paras 4.31 and 4.32 above.

Strategic Sustainability Assessment

- 4.42 The purpose of the Strategic Sustainability Assessment, summarised in para 2, is to assist the preparation of the draft strategy by identifying the key sustainability issues facing the region and, in short, to increase the positive effects and reduce the negative. This is a useful exercise to carry out but examination of the Strategic Sustainability Assessment seems to indicate a relatively superficial assessment of the various issues.
- 4.43 Section 4 looks at the sustainability issues in more detail and table 4.1 lists the sustainability characteristics that are likely to be significantly affected by implementation of the strategy. Point 6 in the Swindon section of the table refers to flood risk and states that the River Ray and tributaries flood plain lies in the eastern development area. Section 10, which deals with sub regional strategy statements, reiterates that at Swindon flood risk issues arise across the favoured development areas and attention will need to be given to this issue and, in a box below, that there will be pressure on Swindon’s waste water treatment systems, as well as water resources.
- 4.44 Comment. The Regional Assembly should be informed that waste water treatment and water resources would seem to be such significant issues that the Strategic Sustainability Assessment should cover them in greater detail than the relatively superficial way that is set out in section 10 as described above.

Pre-submission Consultation Statement

- 4.45 The pre-submission Consultation Statement explains how stakeholder and public involvement was secured in the preparation of the strategy.

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Appendices;

Appendix A	Spatial Strategy for the South West, Inset Diagram 4.2.
Appendix B	Adopted Structure Plan 2016, section 3 extract only.
Appendix C	Report of the Panel, Structure Plan 2016, extract only.
Appendix D	Spatial Strategy for the South East, section B, map B2.

Glossary:

RPG10	Planning Policy Guidance Note 10.
RSS	Regional Spatial Strategy
SSCTs	Strategically Significant Cities and Towns
SWRA	South West Regional Assembly

Background Papers:

South West Regional Spatial Strategy April 2006