

REPORT OF THE STRATEGIC DIRECTOR
TO THE EXECUTIVE COMMITTEE
4 APRIL 2008

Draft South West Spatial Strategy – Panel Report December 2007

1.0 Introduction and Report Summary

- 1.1 The draft Regional Spatial Strategy for the South West (or South West Plan) covers the area which abuts the Vale's western boundary. This area includes Swindon. The report of the panel, which carried out an examination in public of the draft South West Plan, was published in December 2007. This report to the Executive is a summary of the main points arising out of the Panel's Report.
- 1.2 In the draft South West Plan, Swindon is identified as a Strategically Significant City or Town (SSCT) and the location for a strategic urban extension of about 12,000 dwellings on the eastern side of the town (policy SR8). The Council commented on this and other matters in the draft South West Plan (see report 30/06 to SLAG dated 26 June 2006). In particular, the Council objected to policy SR8 principally on the basis that the figure of 12000 dwellings (representing an ambitious annual build rate of 600 dwellings) was unlikely to be achieved and objected to the reference to a new upper Thames reservoir on the basis that Thames Water has yet to formally bring forward a fully justified reservoir proposal and that the reference to a reservoir was therefore premature. Other comments related to the absence of strategic gaps to safeguard the character, identity and setting of the rural villages and communities surrounding the development and the number of vehicle movements onto the A420 likely to be generated as a result of the eastern development.
- 1.3 The Panel Report, among other things, endorses the provision of 12,000 dwellings east of Swindon and identifies a new upper Thames reservoir as part of the key infrastructure. The Panel also accepted that highway improvements to cope with the vehicle movements should be part of the key infrastructure. The Panel includes no recommendation for strategic gaps.
- 1.4 The issue of how an ambitious annual build rate of 600 dwellings will be achieved has not been addressed in any detail by the Panel and the Panel's endorsement of a new reservoir in advance of its formal justification are therefore matters which remain of major concern to this Council.
- 1.5 The Panel Report is submitted to the Secretary of State for Communities and Local Government and is published for information purposes only. The publication of the Panel Report is not, therefore, a further stage of consultation with the public. However, in order that the Secretary of State should be properly briefed it is considered that she should be made aware of the Council's concerns.
- 1.6 The contact officer for this report is Nick Burroughs, Principal Planning Officer (Planning and Community), telephone (01235 520202 extn. 496). **Email address**
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2.0 **Recommendations**

- (a) *that the Executive notes this report on the Panel Report into the draft Regional Spatial Strategy for the South West,*
- (b) *that the Executive remains concerned that the rates of development proposed for the Swindon East expansion are ambitious and unlikely to be achieved, at the absence of appropriate strategic gaps and that because the 'needs case' for the new reservoir has yet to be made, the reference to the new reservoir is premature.*
- (c) *that an appropriate summary of the Council's concerns is sent to the Secretary of State for Communities and Local Government and the Member of Parliament for the Wantage Constituency.*

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

- 3.1 This report relates to the Council's Vision in that it supports objectives A and F. The report does not conflict with any Council Strategies.
- 3.2 While the draft South West Plan's growth proposals for eastern Swindon lie outside the Vale area, it is important to closely monitor where and how this growth is proposed to take place.

4.0 **Background**

- 4.1 The draft Regional Spatial Strategy for the South West (South West Plan), published June 2006, covers the area immediately to the west of the Vale. A number of the draft South West Plan's proposals affect the Vale and the Council formally submitted its comments (see report 30/06 to SLAG dated 26 June 2006). The comments made are summarised below;
 - a) The scale of development proposed at Swindon (policy SR8); 35,000 dwellings in total at annual build rate of 1750 dwellings (to 2026), was excessive,
 - b) The eastern strategic urban extension to Swindon (policy SR8), 12,000 dwellings in total at annual ambitious build rate of 600 dwellings (to 2026), was unrealistic and unachievable,
 - c) Swindon Borough Council is required to work with neighbouring local authorities to ensure that settlements surrounding the town do not coalesce with Swindon but objection was made to the omission of a policy context which addresses the identification of strategic gaps, particularly with regard to the eastern development area.
 - d) Objection was made to a new reservoir on the basis that Thames Water has yet to formally bring forward a fully justified reservoir proposal and that the reference to a reservoir was therefore premature.
 - e) The eastern development area will significantly increase the number of vehicles using the A420 and improvements to access and serve the eastern development area should be listed as an issue of key infrastructure.
- 4.2 An examination into issues raised by the draft South West Plan was carried out by an independent Panel. The Panel's Report (December 2007) makes a number of comments. Those which apply to the matters stated in paragraph 4.1 above are examined in more detail in the next section.

5.0 **Panel Report**

Swindon East

- 5.1 The Panel Report (PR) notes that there were concerns (PR 4.2.28) about the growth figure for Swindon East on the grounds of “experience in masterminding substantial urban extensions and reservations about infrastructure delivery” (note that in this context the terms ‘strategic urban extension to Swindon’, ‘Swindon East’ and ‘Eastern Development Area’ are interchangeable). The Panel notes that developers do not share these reservations and argue for greater provision. Counterbalancing that are the objections from neighbouring Councils that development would spoil the landscape and affect views from the AONB. In summary the Panel considered, provided development is carefully planned and “includes necessary infrastructure”, this (Swindon East) to be a suitably sustainable development location (PR 4.2.29).
- 5.2 The Panel Report paragraphs referred to above do not address the issues of the deliverability of the Eastern Development Area within the proposed timetable or the proposed build rates. The Report gives some consideration to rates of development. It acknowledges that the rates of development implied by the Panel’s proposals are higher than average rates of development in the past but notes that higher levels have been achieved over short periods. The Report states “we assume that these higher rates may have been linked to surges in land availability in the past” and that increased land release in the South West Plan will similarly enable higher levels of development (PR 4.0.38).
- 5.3 The Panel comments that they were assured by the house-building industry that the industry “could respond (to higher rates of development) if the planning system provided the confidence that the land supply would be made available timeously (sic)” (PR 4.0.39).
- 5.4 The proposed average annual build rate for Swindon East is 600 dwellings (see para 4.1 b) above). In its comments on the draft South West Plan the Council observed that the Panel Report (October 2004) into the Wiltshire and Swindon Structure Plan 2016 had concluded (paragraph 3.29) that it “would be reasonable to assume an output from a new major source of development of about 400 dwellings per annum.” Paragraph 3.29 referred to tables in Appendix D. This table is included in Appendix 1.
- 5.5 The South West Plan Panel Report now seems to be able to support a different view, it would seem, because higher than average levels of development have been achieved over short periods in the past (see para. 5.2 above). Reference to the table in Appendix 2 shows that the higher than average levels of development which occurred in the past were, for example, in 2004/05 (919 dws), in 2005/06 (949 dws) and in 2006/07 (1301dws). This gives an average annual build rate for 1996 – 2007 of 653 dwellings. Reference to the table shows that of the eleven years for which dwellings totals are given, just over half (six) show annual build rates below the 600 dwelling average. While the build rates of the most recent years do show higher levels of development, the fluctuations over time that have occurred and may occur in the future, and the Structure Plan Panel Report’s own conclusions on build rates from a major source of development, indicate that a reliance on these higher levels of development may be misplaced.

- 5.6 The South West Plan Panel Report also assumes “that these higher rates may have been linked to surges in land availability in the past”. This may well be true although the textual use of the word ‘may’ suggests that there is no evidence to support this view. Moreover, as the rates show, these build rates are subject to wide fluctuations. An assumption that does not appear to be supported by evidence is unsatisfactory as the justification on which to base a required and sustained increased rate.
- 5.7 The Panel Report in question also noted that the house-building industry could respond to higher rates of development) if the planning system ensured that the land would be made available (see para. 5.3 above). The Panel Report seems to have taken the assurances of the house-building industry at face value. Given that the Panel Report is proposing rates of development significantly higher than was considered acceptable in 2004, more evidence might have been expected on how these assurances had been tested and could be concluded to be robust.

Strategic Gaps

- 5.8 The Council had objected because there was no policy context for strategic gaps to prevent Swindon coalescing with the surrounding settlements. The Panel Report seems to make no specific response to this matter although it may address it in para 4.2.29 by referring to careful planning to include necessary infrastructure provision and suitable Master Planning. Given the proximity of the settlements in the Vale, it is disappointing that this is not explicitly considered.

New Reservoir

- 5.9 The Council objected to the reference to a new upper Thames reservoir on the basis that Thames Water has yet to formally bring forward a fully justified reservoir proposal and that the reference was therefore premature.
- 5.10 The Panel Report notes in para 4.2.39 that there have been issues regarding water supply, ie “a possible new reservoir in the south east region” and that information given to the Panel by the Environment Agency “should not preclude development provided that adjustments to supply... can be undertaken in advance of appropriate stages in the expansion of Swindon.” The Panel Report lists as ‘other key infrastructure’ (PR, Appendix C. recommendation 4.2.5) “provision of strategic water resources to match the demand of houses and jobs generated by the projected growth levels, including a new reservoir (Upper Thames reservoir)”.
- 5.11 With regard to its ‘Water Resources Management Plan’ Thames Water comments that since it undertook stage 1 of its consultation on how to meet the need for more water, the Environment Agency has published its ‘Water Resources Planning Guideline’ (April 2007) and in the light of these guidelines Thames Water is revising its approach to the provision of a new reservoir. Thames Water comments that this means that the needs case for the new reservoir will be addressed in the new Water Resources Management Plan. The draft Management Plan is due to be published in March 2008, followed by a public hearing (if required) in late 2008 with final publication in July 2009.
- 5.12 The new reservoir would be located within the *south east* region to which the draft South East Plan applies. Draft Policy NRM2 states that “strategic new water resources that may be required include: i. Upper Thames Reservoir by 2019/20.....” The South East Plan has been subject to examination and the Panel Report was published in August 2007. The SEP Panel Report notes the views of this Council that it would be

premature “to give policy backing to a project when regulatory and funding investigations ... are still ongoing..... and when the proposal has not been fully tested ...”. However, the SEP Panel Report observes that “if RSS is to provide a forewarning of the long term infrastructure needs.... it seems ... that the policy should be as clear as possible.” (SEP PR 10.16). Interestingly, it also stresses that policy NRM2 only says that the reservoir schemes ‘may’ be required (SEP PR 10.17). The SEP Panel Report’s recommendation is to amend Policy NRM2 “by adding a geographic reference after ... the listed reservoir schemes.” (SEP PR Recommendation 10.3).

- 5.13 However, since Thames Water has still to address the needs case for a new reservoir, the Council would seem still to be right in commenting that a reservoir proposal in a location within the Vale has yet to be shown to be justified.
- 5.14 The Panel Report notes the adjustments to supply that can be undertaken in advance of appropriate stages in the expansion of Swindon, see para 5.10 above, and ‘information’ which a footnote explains relates to an Environment Agency published report by Halcrow on the Swindon Water Cycle. The Environment Agency/Halcrow report summarises that “development in Swindon up to 2025/26 need not be constrained by the uncertainties over the Upper Thames Reservoir, although the timely delivery of the reservoir will alleviate some water supply constraints.” While this information is not disputed, it is disappointing that such a fundamental aspect to the development was not addressed more fully in the body of the Panel Report rather than being alluded to in a footnote.
- 5.15 It seems inappropriate that such a fundamental public utility as water supply is reliant on this ‘minimalist’ sort of approach without a fuller explanation of the evidence base which supports it. It would also seem that an unqualified reference to the new reservoir remains premature and possibly misleading.

Vehicle Movements

- 5.16 The Council commented that the eastern development area will significantly increase the number of vehicles using the A420 and improvements to access and serve the eastern development area should be listed as an issue of key infrastructure.
- 5.17 The Panel Report notes that there is a need for improvements to public transport, demand management and road improvements. Indeed, the Report states that the eastern extension cannot be delivered without improvements to the transport infrastructure (PR 4.2.41). Consequently, the Panel Report recommends that the key infrastructure list should be modified to include a transport package (PR, Appendix C, recommendation 4.2.5).

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Background Papers:
Report 30/06 to SLAG dated 26 June 2006