VALE OF WHITE HORSE DISTRICT COUNCIL

REPORT OF THE DEPUTY DIRECTOR TO THE EXECUTIVE COMMITTEE <u>6 JUNE 2008</u>

Swindon Borough Core Strategy & Development Control Policies Preferred Options, March 2008

1.0 Introduction and Report Summary

- 1.1 The Swindon Borough Council (SBC) is preparing its Core Strategy. Following the Issues & Options stage, SBC has now published its Preferred Options (PO) document. This will set the context for future growth at Swindon over the next twenty years.
- 1.2 Much of the document addresses matters local to Swindon. However, for the Vale the document touches on issues such as the relationship with villages outside Swindon and the eastern extension to Swindon comprising 12,000 dwellings. The document asks for the public's views on its contents and seeks responses to a number of specific questions, particularly in relation to the vision and objectives which underpin the preferred options.
- 1.3 A report on this matter was considered by the Strategic and Local Planning Advisory Group on 6 May 2008 (Report No.192/08). Based on this report and the comments of the Advisory Committee, see Minute 40 of that Committee, comments on the Core Strategy were submitted to Swindon Borough Council. Due to a deadline of 12 May for these comments, it was not possible for the Executive Committee to consider these comments before they were submitted. The covering letter for the comments explained that this matter would be taken to the Executive Committee for further consideration and ratification.
- 1.4 The comments which were submitted to Swindon Council were amended to take into account Minute 40 and formatted as responses to be consistent with the section headings in the Borough Council's own comments' form. These responses are set out in the body of this report.
- 1.5 Members should note that since this matter was considered by the Advisory Committee, Thames Water has published its draft Water Resources Management Plan (May 2008) which identifies the proposed reservoir in the upper Thames as the preferred option to maintain security of supply from AMP7 onwards. AMP7 is the period 2020 to 2025. The proposed response has been changed accordingly, see paragraph 4.1.33 below.
- 1.6 The contact officer for this report is Nick Burroughs, Principal Planning Officer, telephone (01235 520202) <u>Email address nick.burroughs@whitehorsedc.gov.uk.</u>

2.0 <u>Recommendations</u>

that the Executive Committee consider the Responses to the Swindon Borough Core Strategy as set out in Section 4 of this report and, subject to any further amendments, agree that these are formally submitted to Swindon Council as the Vale Council's responses in this matter

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

3.1 This report supports aims A,B,E and F of the Council's Vision through the appropriate and timely responses to a neighbouring authority's draft development proposals which may have implications for the Vale and its western communities.

4.0 Swindon Borough Core Strategy and Preferred Options

4.1 The responses to the Borough Core Strategy are set out below and have been formatted to be consistent with the section headings in the Borough Council's own comments' form.

The Spatial Vision

- 4.1.1 The Council does not agree with the Spatial Vision.
- 4.1.2 The Vision must acknowledge that Swindon will experience significant growth and that it will be important that the major urban extensions will be designed not only to create sustainable places where people will want to live and work and which will meet their aspirations for services, facilities and travel choices but which will be supported by the provision of adequate and timely infrastructure on and off-site and relate to the wider contexts set by the existing locational factors, the local road network and the relationship with Swindon and the wider landscape.

The Spatial Framework

4.1.3 For comments on the Spatial Framework see response to Preferred Options below.

The Preferred Options

- 4.1.4 The Council does not agree with the Preferred Option.
- 4.1.5 The Spatial Framework Preferred Option must include a specific and clear reference to strategic gaps, identifying their general locations and extent; require the timely provision of significant infrastructure and provide more detail on the nature of and how this will be delivered. The strategic gaps must also be shown on the Key Diagram. This will confirm and enshrine their strategic importance and give them appropriate weight. There is a risk to the proper provision of strategic gaps if their implementation relies only on inclusion at the master plan stage.
- 4.1.6 There must also be reconsideration of the Alternative Options in order to test an option which would involve a reduced Eastern Development Area and enlarged or greater number of urban extensions in other locations.
- 4.1.7 With regard to the 'Eastern Development Area Preferred Option' there must be a much clearer statement in the Preferred Spatial Strategy about the specific nature, timing and phasing of infrastructure provision for the eastern development area, similar to that in relation to the smaller scale urban extensions.

- 4.1.8 With regard to the 'Commonhead Preferred Option', this has been shown by the Borough Council to be a sustainable location for development (see Swindon Borough Local Plan, Revised Deposit Draft 2011, October 2003, background papers). It would, therefore, seem logical to bring it forward for further housing that will optimise the use of the site whilst still protecting the valuable Coate Water Resource. Moreover, in any assessment of environmental constraints, the need for housing to meet the Regional Spatial Strategy requirement and to provide locational choice must be as important as any economic and social benefits. The amount of land required in the Eastern Development Area should be reduced as a consequence.
- 4.1.9 With regard to 'Borough Wide Preferred Spatial Policies', further comment is made on flood risk, developer contributions and green infrastructure.

Flood Risk

4.1.10 Since Guidance in PPS25 on Development and Flood Risk notes that local development documents should set out policies for the allocation of land and control of development which avoid flood risk, there must be a borough wide core strategy policy on the need for flood risk assessments.

Developer Contributions

4.1.11 Developer contributions for infrastructure must explicitly include contributions to ongoing management & maintenance.

Green Infrastructure

4.1.12 The Borough wide policy on Green Infrastructure must include an appropriate reference to the Great Western Community Forest.

Background Studies

4.1.13 No comment.

Sustainability Appraisal

4.1.14 No comment.

Key Objectives

- 4.1.15 It is not considered that there are any other key objectives which should be included the Core Strategy.
- 4.1.16 However, this part of the Core Strategy also considers 14 themes important to the future development of Swindon. These include sustainable growth and development, transport, green spaces, rivers and canals, and rural areas. However, the themes tend to be inward looking and no theme explicitly addresses the roles and relationships of Swindon (as a regionally significant town) with its surrounding centres, such as Faringdon, Marlborough, Chippenham and Cirencester. Given Swindon's sub-regional role, it's relationship with the surrounding centres must be made explicit and this must be a theme which is considered by the Core Strategy.

4.1.17 Comments on the key objectives are set out below.

Key Objective 1

- 4.1.18 The Council does not agree with Key Objective 1.
- 4.1.19 As the Borough Council itself notes, the delivery of infrastructure had been the subject of most of the comments at Issues and Options stage. In relation to the major eastern development of 12,000 dwellings, the provision of the related infrastructure is particularly critical. It is not enough to refer to this as 'appropriate' investment. This investment is essential to the proper planning of such a major development area. Key Objective 1 must therefore be written in stronger terms that convey the importance and crucial nature of these infrastructure requirements. Moreover, the objective must make clear that infrastructure requirements, in particular with regard to transport issues, will extend beyond the borough boundaries and into, for example, the Vale of White Horse District in Oxfordshire.

Key Objective 2

- 4.1.20 The Council does not agree with Key Objective 2.
- 4.1.21 The security of the water supply is referred to by the Borough Council as a key issue in the Sustainable Development and Climate Change section. This must be acknowledged in Key Objective 2 to reflect the critical nature of water supply to the delivery of sustainable new development.

Key Objective 7

- 4.1.22 The Council does not agree with Key Objective 7.
- 4.1.23 Swindon's sub-regional role must be reflected in an explicit acknowledgement in Key Objective 7 that sustainable transport must include links with surrounding towns and villages some of which will be outside the borough.

Key Objectives 10 & 11

- 4.1.24 The Council does not agree with Key Objectives 10 and 11.
- 4.1.25 Although the supporting text highlights the special needs of some in the community, and suggests that specialist homes will need to be provided as part of all major developments, this must be explicit in the key objectives. Key Objective 10 makes no reference to these special needs as part of the provision of affordable housing. Key Objective 11 does refer to 'lifetime homes' but it must also refer to 'close/extra care housing'. Key Objective 10 or 11 must include a commitment that delivery of specialist homes will be a requirement of all major development and will be developer funded.

Key Objective 13

- 4.1.26 The Council does not agree with Key Objectives 13.
- 4.1.27 It is unacceptable that the Core Strategy's only objective dealing with the Rural Areas around the town makes no reference to the critical need to maintain the separate

identity of the settlements around Swindon. This must be added to Key Objective 13. It is not acceptable that this will be addressed under urban extensions as this does not secure inclusion of this important issue as a key objective. Key Objective 13 must also clarify that this also applies to settlements within and beyond the borough boundary, such as Bourton, Shrivenham and Ashbury.

Additional Comments

- 4.1.28 The Comments' Form does not include a 'comments box' relating to Part 3 of the Core Strategy : 'Implementation, Delivery and Monitoring.' This covers Infrastructure Provision and Funding and the accompanying table sets out the likely infrastructure requirements for Swindon in the period to 2026.
- 4.1.29 The Council does not agree with the Infrastructure Requirements table.
- 4.1.30 The specific infrastructure requirements for the eastern development area must be set out in sufficient detail to meet the document's own test that the accompanying table sets out the likely infrastructure requirements for Swindon in the period to 2026.
- 4.1.31 The Infrastructure Requirements table notes in relation to transport improvements (section 2) that funding has been secured to commission consultants to identify a series of transport 'interventions' to facilitate Swindon's growth. The identification of a major development area before the detailed work has been completed on the details of the infrastructure needed to support it does not seem to meet the document's own test, as referred to above, and would not seem to be consistent with good planning.
- 4.1.32 The Council does not agree with paragraph 25.10.
- 4.1.33 The text at paragraph 25.10 notes that "with sufficient demand management proposals water resources can be secured to about 2023." Beyond that period it will be difficult to supply water needs from present sources and reference is made to Thames Water's proposed major new reservoir. There are significant uncertainties over the proposed reservoir. With regard to the 'need case' Thames Water, in its recently published draft Water Resources Management Plan (May 2008), identifies this reservoir as the preferred option to maintain security of supply from AMP7 onwards. AMP7 is the period 2020 to 2025. However, the historical revisions to the timetable do not lead to confidence in future target dates. This raises concerns over the planning of a major strategic housing allocation on the basis that a provisional and as yet unjustified reservoir is going to be built.

RODGER HOOD DEPUTY DIRECTOR (PLANNING AND COMMUNITY STRATEGY)

Background Papers:

- The Draft Regional Spatial Strategy for the South West 2006 2026
- Draft Regional Spatial Strategy for the South West, Panel Report 2007
- Swindon Borough Core Strategy & Development Control Policies Preferred Options, March 2008