

REPORT OF THE DEPUTY DIRECTOR
TO THE EXECUTIVE
17 OCTOBER 2008

Draft South West Spatial Strategy – Secretary of State’s Proposed Changes August 2008

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. An independent panel of planning inspectors examined the draft Plan and the representations made. The Report of the Panel was submitted to the Secretary of State in January 2008. Following receipt of the Panel Report the Secretary of State has now published her proposed changes to the draft Plan under cover of a letter from Baroness Andrews to Sir Simon day, Chair of the South West Regional Assembly. Responses to the proposed changes are required by Friday 24 October 2008. This report describes and comments on the main changes that are proposed and sets out a proposed response from this Council. The document incorporating the proposed changes runs to some 290 pages.
- 1.2 There is also a covering letter from Baroness Andrews to Sir Simon day, Chair of the South West Regional Assembly.
- 1.3 In the draft South West Plan, Swindon is identified as a Strategically Significant City or Town (SSCT) and, among other things, the Plan includes the proposed location of a strategic urban extension of about 12,000 dwellings on the eastern side of the town. This was endorsed by the Panel Report. The Secretary of State has accepted that provision for sustainable housing growth in Swindon should include 12,000 new homes to the east of the town. This and other more detailed matters will be considered further in the main body of this report.
- 1.4 In her covering letter the Secretary of State notes that while the basis of the draft Plan has been retained, changes are proposed to reduce its length and make it clearer. These are summarised as:
- a) Section 2 ‘The Context for the Spatial Strategy’ has been deleted in its entirety.
 - b) Section 4 ‘Sub-Regional Strategy Statements and Housing Distribution’ and Section 5 ‘Regional Approach to Transport’ have been deleted and completely replaced.
 - c) A new policy ‘Policy CSS’ sets out the core objectives of the strategy.
 - d) Housing provision over the plan period is increased by 29% over that in the draft Plan. The additional housing growth is proposed at Bristol, Exeter and Plymouth.
 - e) The affordable housing target is increased from 7,500 to 10,000 homes per annum.
 - f) Changes have also been made to Policy G on Sustainable Construction and Policy RE5 on Renewable Energy to more closely align them with national policy.
- 1.5 The Secretary of State comments that the changes signal the need for the draft Plan to be refined through a partial review to ensure the South West maximises its contribution to the national home building target. Any additional housing growth will need to be

planned in the most sustainable way by identifying further broad locations to meet longer term development needs, considering proposals for New Growth Points and Ecotowns.

- 1.6 The Secretary of State also notes that the changes amend the overarching policy in the draft Plan on infrastructure to ensure that the policy is focussed on regional and sub-regional infrastructure but that the changes do not include detailed proposals on infrastructure as further work is required to assess infrastructure needs and priorities. Further comment is made on this in the main body of this report.
- 1.7 The contact officer for this report is Nick Burroughs, Principal Planning Officer (Planning and Community), telephone (01235 520202 extn. 496). **Email address** **nick.burroughs@whitehorsedc.gov.uk**.

2.0 Recommendations

That the Executive agree that the following responses on the draft South West Plan Proposed Changes, subject to any further amendments, are formally submitted to the Government Office for the South West:

- (a) The Council objects to Development Policy A, as proposed to be changed, because the references to the wider context have been deleted and recommends that new Development Policy A, as proposed to be changed, is amended to restore these explicit references to the wider context.*
- (b) The Council objects to Development Policy D, as proposed to be changed, because it does not require that the regionally and sub-regionally significant infrastructure required to service development has been identified and proven to be deliverable and recommends that Development Policy D, as proposed to be changed, is amended by the addition of the words 'as part of the relevant major development proposal as set out in the RSS'*
- (c) The Council supports the addition to para 3.7.3 of the clause "well-connected by sustainable transport to higher order services and facilities in city and town centres".*
- (d) The Council objects to Development Policy F, as proposed to be changed, because it does not explicitly acknowledge that urban extensions have implications for their surrounding communities and recommends that Development Policy F, as proposed to be changed, fourth bullet point, is amended as follows; 'amenity space and green infrastructure that meets community needs, provides adequate protection to existing neighbouring communities, respects the landscape setting and supports improved biodiversity'.*
- (e) The Council objects to Policy HMA2: Swindon HMA, as proposed to be changed, because it should make provision for an additional search area of sustainable housing and accordingly make consequential changes to the quanta of new homes set out in the respective search areas and require that the regionally and sub-regionally significant infrastructure required to service development has been identified and proven to be deliverable. It recommends that Policy HMA2: Swindon HMA, as proposed to be changed, is amended;*
 - (i) as it relates to Area of Search 2A to the east of Swindon by the deletion of 12,000 new homes and the substitution of 10,200 new homes,*
 - (ii) by the insertion of a new Area of Search at Commonhead for 1,800 new home, and*
 - (iii) by the insertion of the following text ' The release of land for the proposed 10,200 homes at Area of Search 2A to the east of Swindon is dependent upon the confirmation that the transport and*

other infrastructure required to service the development has been identified and proven to be deliverable.’

- (f) *The Council objects to Policy RTS1, as proposed to be changed, because it does not reflect the connectivity that the regionally important A420 provides between the South West and South East Regions and recommends that Policy RTS1, as proposed to be changed, is modified to reflect that the A420 Swindon to Oxford Road has the same status as it has in the draft South East Plan.*

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, B,E 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 The Proposed Changes

- 4.1 Following the Examination in Public into the draft South West Regional Spatial Strategy (draft South West Plan), and publication of the Panel Report in January 2008, the Secretary of State has published her proposed changes to the draft Plan. The documents which relate to these proposed changes comprise:
- a) Draft revised Regional Spatial Strategy for the South West incorporating the Secretary of State’s Proposed Changes,
 - b) Schedule of the Secretary of State’s Proposed Changes and Reasons,
 - c) Sustainability Appraisal/Strategic Environmental Assessment of the Proposed Changes,
 - d) Habitats Regulation Assessment of the Proposed Changes.
- 4.2 4.2 These documents can be seen on the web site of the Government Office for the South West, follow link: <http://gosw.limehouse.co.uk/portal> One paper copy of the draft Regional Spatial Strategy incorporating the Proposed Changes and the Schedule of Proposed Changes is held in the Development Policy service area together with a disc containing all the documents. The headings and format of the draft South West Plan, as proposed to be changed, have been used to structure the comments as set out below. The headings are set out in bold and underlined.

1.4 Major Challenges the Region Faces

- 4.3 New supporting text is proposed after para. 1.4.4 which includes the following;
- ”There are a number of factors that have a particular influence on spatial development in the region. The following factors have been particularly critical to the shaping of the strategy:
- the South West’s relationships with, and connectivity to, other regions: the South East, London, West Midlands and Wales being particularly important;
 - the importance of sustaining the region’s high quality environment and cultural assets;
 - the relationship between rural and urban areas, the roles of the cities and towns and the links between them (many of which cut across administrative boundaries) and the importance of ensuring that future roles reflect function rather than size; and

- the need to plan for anticipated economic and population change.”

Officer Comment and Recommendation

- 4.4 While these changes are welcome, when looked at in the wider context there are a number of points of detail that can be made.
- 4.5 The first bullet point refers to connectivity to other regions. This should mean what it says. In the draft South East Plan (Companion Document) the A420 which links Swindon with Oxford is annotated as a ‘Regional Spoke’, (para 8.28 and diagram T2). The same A420 within the draft South West Plan is not similarly annotated and little or no recognition is given to its role in linking the two regions. This does not, on the face of it, seem to support connectivity. This issue is further discussed in relation to Policy RTS1 at para 4.46 below. Members will be aware that use of the A420 is likely to increase substantially as a result of the proposed eastern extension to Swindon.
- 4.6 The third bullet point refers to the relationship between rural and urban areas. This Council agrees that this is important and, particularly with regard to Swindon and its surrounding area, this relationship should properly reflect that a large town like Swindon should look outwards to its surrounding areas as well as looking inwards. In this context this Council has previously made representations about the role that strategic gaps can play in this relationship, maintaining the separate identities of towns and their surrounding rural communities. It is therefore disappointing that the draft South West Plan which seeks to strengthen Swindon’s “role in a sub-region which extends into the neighbouring South East region” (para 4.1.21) and which had previously required that major development areas will “maintain environmental assets and landscape setting” (draft South West Plan, Development Policy F) is now proposed to be changed to delete this requirement.
- 4.7 The proposed change to Development Policy F is considered further in paras. 4.35 and 4.36.

Policy SD3 The Environment and Natural Resources

- 4.8 Policy SD3 (which follows para 1.6.15) seeks to protect and enhance the environmental and natural resources. The fifth bullet point requires “Positive planning and design to set development within, and to enhance, local character....”.

Officer Comment and Recommendation

- 4.9 As already referred to in para 4.6 above, it is disappointing that while the draft South West Plan acknowledges the importance of setting development within and enhancing local character, the policy wording of Development Policy F, which would make this a formal policy consideration, has been deleted.
- 4.10 It is recommended that objection is made to Development Policy F as proposed to be changed and that Development Policy F as proposed to be changed is modified as set out in paras. 4.35 and 4.36 below.

3. The Spatial Strategy and Policies for the Scale and Location of Development **Development Policy A**

- 4.11 Development Policy A confirms that the primary focus for development within the draft South West Plan will be at the Strategically Significant Cities and Towns (SSCTs).

Modifications to Development Policy A are set out after para. 3.3.2. As stated elsewhere in the draft South West Plan, Strategically Significant Cities and Towns have a critical regional or sub-regional role. The changes to Development Policy A have been made to incorporate as policy the key objectives as set out in draft Plan para 3.3.3. Reference to new Development Policy A and para. 3.3.3, (now deleted as part of the proposed changes) shows that there are a number of significant changes. The latter included references to 'the setting and surroundings of ... towns' (first bullet point), 'the provision of urban extensions in an integrated way' (fifth bullet point), and 'ensure that where dormitory relationships exist between the SSCT and other ...villages, this is not exacerbated by the development proposals' (sixth bullet point). These bullet points are now missing.

Officer Comment and Recommendation

- 4.12 The original wording in para 3.3.3 reflected the SSCT's sub-regional role and relationship with its surrounding area. It is disappointing that in the new Development Policy A these references to the wider context have been deleted. This would seem to reinforce the view that the policy seeks to be predominantly inward looking and now has only an implicit regard to the role and impact of Swindon in relation to its surrounding areas. See recommendation (a).

Providing key infrastructure to support the spatial strategy **Development Policy D, Infrastructure**

- 4.13 New supporting text is proposed for this policy which relates to providing key infrastructure. This text includes the following;

"The RSS has a key role in identifying 'regional' infrastructure requirements, such as improvements to the strategic transport network. The RSS also has a key role in identifying 'sub-regional' infrastructure that is needed, such as improvements on key public transport corridors to help the SSCTs function better. The RSS sets the policy framework to ensure that significant new development – such as urban extensions and major regeneration projects – plan for and deliver the range of infrastructure needed to secure sustainable communities that work."

- 4.14 Implicit in this statement is that the sub-regional infrastructure that is needed will be identified in the draft South West Plan. The Secretary of State (in her covering letter, see also para 1.5 above) stresses that the "Government is committed to ensuring that development is accompanied by the infrastructure" that it needs. However, while the Secretary of State notes that the proposed changes to the draft South West Plan amend the policy on infrastructure to ensure it is sufficiently focussed on regional/sub-regional infrastructure, the changes do not "include detailed proposals on infrastructure as further work is required to assess infrastructure needs and priorities."

Officer Comment and Recommendation

- 4.15 Your officers have serious concerns regarding the identification and provision of the transport infrastructure needed to facilitate the eastern urban extension of Swindon.
- 4.16 The proposed eastern urban extension of Swindon is about 12,000 dwellings. For comparison purposes, Chippenham had 11,817 dwellings in 2001 (Census, Neighbourhood Statistics, UV55). This urban extension is therefore the equivalent of 'creating another Chippenham' to the east of Swindon. Chippenham itself is identified in the draft South West Plan as a Strategically Significant Town, (Policy HMA2).

- 4.17 In the context of the new supporting text confirming that the draft South West Plan has a key role in identifying 'sub-regional' infrastructure (see para 4.14 above) and of the Secretary of State's comments in her letter (see para 4.15 above), it could be assumed that Swindon's eastern urban extension does not require any sub-regional infrastructure, since this should be clearly identified in the draft South West Plan, as proposed to be changed. It could also be assumed that the infrastructure that it does require can be satisfactorily assessed as part of the further work referred to by the Secretary of State.
- 4.18 However, in its previous comments on Swindon's eastwards major expansion this Council has sought to stress the major transport implications of this development for the existing A420 and for sustainable transport links with surrounding areas and the town centre, particularly because the required infrastructure improvements are likely to extend well outside the area of the major urban extension itself and are likely to affect strategically significant routes. As such your officers believe properly planned transport infrastructure to be essential to help the Strategically Significant City and Town (SSCT) of Swindon function.
- 4.19 In preparing its Local Development Framework, Swindon Borough Council published its Core Strategy Preferred Options in March 2008 (see Committee Report No.192/08). Members will recall that the Preferred Options sought to consider Infrastructure Provision. The Council's comments with regard to this issue are set out in Report No.192/08. Two particular points were made in those comments with regard to transport infrastructure improvements.
- 4.20 Firstly, this Council noted that the "identification of a major development area before the detailed work had been completed on the details of the infrastructure needed to support it did not seem to be consistent with good planning" (para 4.54).
- 4.21 Secondly, there was reference in the Preferred Options to a 'Vision for Transport to 2030' and that the Borough Council had secured funding for consultants to identify a series of transport interventions to facilitate Swindon's growth, noting that "further transport solutions will come forward through this Transport Strategy". This Council commented that expecting that "transport solutions will come forward" was weak and inadequate in the context already described (para 4.56).
- 4.22 A further inspection of the Borough Council's Vision for Transport to 2030 has confirmed that it is a 'broadbrush' document which touches only briefly on how transport can facilitate the Borough Council's vision to make Swindon 'the UK's best business location'. This Vision contains no information on the specific transport infrastructure required, what may be feasible and what may be funded. It would seem that this will only become clear when the transport consultants are in a position to report.
- 4.23 In essence, it would appear that the assessment of the transport infrastructure required for Swindon's eastern urban expansion expected at both the regional and local levels is to be carried out as part of further work that Swindon Borough has yet to complete.
- 4.24 This effectively means that a major urban extension of some 12,000 dwellings is being accepted in a location which has only very limited existing linkages to other parts of the town and which will impact heavily on the surrounding network before a clear transport strategy is in place. Members might wish to question why a development

equivalent in size to a small town such as Chippenham is not considered significant at the sub-regional level and therefore how it can be planned for and agreed by the Secretary of State with no transport strategy in place?

- 4.25 The Secretary of State, in her covering letter, accepts that the draft South West Plan “should not, at this stage, include specific proposals for infrastructure provision” and notes that if a “specific proposal for infrastructure were included at this stage” the draft South West Plan “would be exposed to a substantial risk that, on further testing, those (sic) may be found to be undeliverable”.
- 4.26 The new text in the draft South West Plan supporting Development Policy D notes that “Programmes of Development, prepared by the region’s Growth Points, have provided greater clarity about the key infrastructure required to support growth at.... Swindon”
- 4.27 Development Policy D, Infrastructure, as proposed to be changed, confirms that the planning and delivery of development ...“should provide for the delivery of new or improved transport, in step with development. Central Government, Local authorities, regional bodies, service providers and developers will work in partnership to identify regionally and sub-regionally significant infrastructure requirements and solutions, including funding.”
- 4.28 Development Policy D, as proposed to be changed, seeks to provide for the delivery of new or improved transport infrastructure and to identify sub-regionally significant infrastructure requirements. Consistent with the Secretary of State’s concerns that later testing does not show required infrastructure to be undeliverable, this policy should reflect that requirement in its wording.
- 4.29 This Council’s particular interest is development at Swindon and this is specifically covered by Policy HMA2: Swindon HMA which is considered at paras 4.39 to 4.42 below. However, in the context of the delivery of infrastructure, it is recommended that the Council makes a related objection to Policy HMA2: Swindon HMA and that it is amended to require that release of the land for the proposed quantum of new homes at Area of Search 2A to the east of Swindon is dependent upon confirmation that the transport and other infrastructure required to service the development has been identified and proven to be deliverable.
- 4.30 With regard to Development Policy D, as proposed to be changed, see recommendation (b) and with regard to Policy HMA2: Swindon HMA see recommendation (e).

Para. 3.7.3

- 4.31 Paragraph 3.7.3 has been amended by the addition of a reference that larger urban extensions should be “well-connected by sustainable transport to city and town centres. The reference to the importance of sustainable transport is welcomed but it serves to emphasise that the infrastructure required to provide it is important enough to be specifically mentioned and should therefore be identified in the South West Plan, as suggested in paragraph 4.30 above.

Officer Comments and Recommendation

- 4.32 See recommendation (c).

Development Policy F

- 4.33 Development Policy F, which follows paragraph 3.7.4, requires that, for example, urban extensions should be planned on a comprehensive and integrated basis. The fourth bullet point is about “amenity space and green infrastructure that meets community needs...”. Generally the thrust of this policy is supported but deleted from the text has been the reference to “maintain environmental assets and landscape setting”.

Officer Comments and Recommendation

- 4.34 Large urban extensions, by their nature, will have significant implications for surrounding areas. The previous reference to ‘landscape setting’ acknowledged this context but the new wording of Development Policy F, as proposed to be changed, is inward looking. While the reference to ‘meet community needs’ may implicitly include surrounding communities, the scale of urban extensions and the implications that they may have for surrounding communities should be explicitly acknowledged in the policy. See recommendation (d).
- 4.35 See also cross reference to paragraphs 4.6 and 4.12 above.

4. Sub-Regional Policies and Housing Distribution **Areas of Search**

Policy HMA2: Swindon HMA

- 4.36 Section 4 has been completely replaced. New paragraph 4.0.11 relates to ‘Areas of Search’. It notes with reference to Swindon, among others, that a 360- degree Area of Search is shown to reflect the need for further work to determine the most appropriate direction(s) for growth. Key Diagram Inset 2 ‘Swindon Housing Market Area’ accordingly shows this new notation.

Officer Comments and Recommendation

- 4.37 At first sight this additional notation to the inset map would seem to have unintended implications. Does it mean, for example, that Swindon’s eastwards expansion can be reviewed as to whether it is the most appropriate direction for growth?
- 4.38 In previous comments, this Council has made representations that the size of Swindon’s eastwards expansion should be scaled back and that more development could be located at Commonhead, Coate, on the town’s south eastern edge.
- 4.39 This Council has argued consistently that Swindon’s eastwards extension relies on over optimistic build rates and that if the amount of housing is scaled down, with compensating provision made elsewhere this will widen locational choice, improve the likelihood of the required build-rate being achieved and avoid a situation where problems with one site could frustrate the delivery of housing.
- 4.40 Commonhead, which could accommodate around 1800 homes, has been demonstrated to be a sustainable location for development. It would therefore seem logical to bring it forward for further housing that will optimise the use of the site. See recommendation (e).

Swindon SSCT

Para 4.1.21

- 4.41 New paragraph 4.1.21 refers to Swindon's role in the sub-region that extends into the neighbouring South East Region. The Council welcomes this recognition. However, given that this is the situation, it should be reflected in the manner in which issues are addressed.

Officer Comments and Recommendation

- 4.42 Swindon, and its urban extensions, will have significant implications which extend into the surrounding area and this should be recognised as suggested in the responses to Development Policy F, see paragraph 4.35 above, the provision of transport infrastructure, see paragraphs 4.29 and 4.30 above and transport connectivity, see paragraph 4.47 below.

Policy RTS1 – Corridor Management

- 4.43 Policy RTS1 is part of Section 5 (which has been completely replaced) which is the Regional Transport Strategy. This identifies corridors of national and regional importance. These are set out in Policy RTS1, as proposed to be changed. Policy RTS1, as proposed to be changed, does not include the A420 road from Swindon to Oxford.

Officers Comments and Recommendations

- 4.44 Para 4.5 above makes the point that in the draft South East Plan the A420 road which links Swindon with Oxford is annotated as a 'Regional Spoke', (para 8.28 and diagram T2). The same A420 within the draft South West Plan is not similarly annotated and little or no recognition is given to its role in linking the two regions.
- 4.45 See recommendation (f).

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Background Papers:

Report 75/08 to SLAG dated 18 September 2008
Report 192/08 to SLAG dated 6 May 2008
Report 184/07 to Executive dated 4 April 2008
Report 30/06 to SLAG dated 26 June 2006