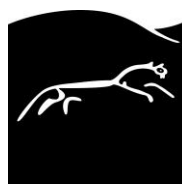


Planning

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Your reference: Swindon Borough Local Plan
Revised Pre-Submission Draft

By email:
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30 September 2021

Dear Planning Policy Team,

Swindon Borough Local Plan Revised Pre-Submission Draft (Regulation 19)

Thank you for providing the opportunity for Vale of White Horse (VOWH) District Council to comment on the revised pre-submission Regulation 19 Draft Swindon Local Plan.

As context for our response, we note that Policy NC3 of the adopted Swindon Borough Local Plan 2026 identifies a strategic mixed-use allocation (including 8,000 new dwellings) on land to the east of the A419, known as the New Eastern Villages, including Rowborough and South Marston Village Expansion. We also note that in your new plan you are continuing the spatial development strategy in your adopted plan, including a strategy of large urban extensions to deliver planned growth to 2036.

In our previous comments on the Regulation 19 Draft Local Plan (dated 31 January 2020), we expressed concern that the housing element of the New Eastern Villages strategic allocation appeared to have increased from the original 8,000 dwellings to 8,923 dwellings, without evidence on the delivery of necessary transport infrastructure to support development on this scale.

We appreciate your recent clarification that Table 3 (Summary of Housing Supply) at paragraph 4.2.12 of the revised Draft Local Plan represents a 'best estimate' of existing housing commitments within the New Eastern Villages (NEV) strategic site allocation (i.e. that the 8,923 dwellings is based on a mix of actual planning permissions, planning applications and expected capacities on the remaining parts of the site). We also understand that this does not represent an increase in the overall site area/boundary for the strategic allocation and simply reflects the ongoing discussions with site promoters over matters such as building densities, how much land will be taken up by different uses etc.

We do, however, still consider that the statement in Policy SA3 (New Eastern Villages) that the development ‘...shall provide about 8,000 homes across the NEV’ is misleading, if it is envisaged that overall capacity for the strategic site will be closer to 9,000 dwellings.

Furthermore, we still have strong reservations about the scale of residential development proposed in close proximity to the county boundary with Oxfordshire and Vale of White Horse District and its potential impact on the local highway network. In particular, we have concerns over additional traffic generation on the A420 towards Shrivenham and Watchfield and, in the absence of up-to-date transport modelling evidence, we cannot be assured that the proposed mitigation measures are sufficient to justify development on this scale.

We have similar concerns over cumulative growth in the Highworth area (as proposed under policies LA18 to LA21) and its impact on the highway network and we concur with previous comments made by Oxfordshire County Council that there needs to be clear evidence provided to demonstrate that highways impact from cumulative planned development to the east of Swindon, including committed sites in Oxfordshire, will be within acceptable limits.

It would be helpful to have clarification on why, under paragraph 4.2.1, the annual housing need figure is cited as 1,080 dwellings, compared with the 1,040 dwellings in the previous December 2019 consultation. The reason for this increase is not clear from the revised plan or evidence base and we are particularly concerned about the resultant increase in the housing allocations for Highworth, which (from Table 1 within Policy SP2) appear to have increased from a total of 516 dwellings to 866 dwellings over the plan period.

Many Western Vale residents rely on Swindon for employment, health care, shopping and leisure provision and this reliance places pressure on the local highway network (particularly the A420 and the A361 through Highworth), with local residents experiencing long evening rush hour queues along the A420 and traffic congestion at the Thames bridge on the edge of Lechlade (in Swindon Borough). Such pressure will only be exacerbated by the planned growth of the New Eastern Villages and we would urge you to give priority to finding sustainable transport solutions to mitigate the impact of development across the Borough, which would support the Council in achieving its key development objective (as set out in paragraph 3.2.1) to ‘*deliver growth that is balanced and sustainable, and provides the necessary infrastructure, while addressing the impacts of climate change.*’

We support the provision of sustainable transport measures under Policy SA3 (3), especially provision of an integrated public transport route and services connecting the Eastern villages to Swindon Town Centre, which will help reduce congestion along the A420. We also support the provision of an improved gateway junction at White Hart to manage additional demand on the A420/A419 and deliver high quality public realm, as well as the planned improvements to the Oxford Road/Drakes Way and Covingham Road/Dorcan Way transport corridors which include public transport links to the town centre.

Under SA3 (8), we support reference to ensuring that the development will respect the landscape context and views to and from the North Wessex Downs AONB

(including potential off-site mitigation) and will minimise the risk of flooding, both within the development and at existing neighbouring communities (including those in the Vale of White Horse District). A recent addition to the National Planning Policy Framework (July 2021) addresses development in the setting of AONBs (see para 176), instructing that it should be sensitively located and designed to avoid or minimise adverse impacts on the designated area.

From a VOWH perspective, criterion 11 of Policy SA3 is critical and development at South Marston must contribute towards the creation of an integrated village with a *distinct rural and separate identity from Swindon and other settlements*, which we consider to include Shrivenham and Bourton (both of which are situated close to the eastern edge of the NEV development boundary).

With specific regard to the prevention of coalescence between Shrivenham and the NEV allocation, we draw your attention to the Shrivenham Neighbourhood Plan 2018-2031, which was made on 18 May 2021 and now forms part of our development plan. Objective SDS1 of the Neighbourhood Plan reads as follows:

Objective SDS1:

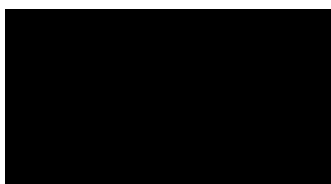
'To prevent coalescence of Shrivenham with neighbouring settlements and preserve the countryside setting of the village.'

We are pleased to see reference (under criterion 14 - Protection of Other Existing Villages) in SA3 to the need to protect the character and identity of Wanborough, Bishopstone and Bourton by a principle of non-coalescence between the settlements, as defined on the Policies Map. However, this principle should be extended to include Shrivenham, which is located only 1 mile to the east of the South Marston village extension within the Vale District. Shrivenham should also be mentioned in supporting paragraph 5.3.2.

Finally we are pleased to see that our earlier comments on Policy DM20 (previously DM22 – Infrastructure Requirements Resulting from Development) have been taken on board and we now fully support this policy.

At Vale of White Horse District Council, we are committed to working collaboratively with our neighbouring authorities. Thank you again for the opportunity to review your revised pre-submission document and we hope that a positive working relationship between the two councils continues as you progress with your Local Plan Review to 2036 and we begin preparation of our new Joint Local Plan to 2041.

Yours faithfully,



Adrian Duffield
Head of Planning
Vale of White Horse District Council