

Bishopstone Parish Council
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Planning Service
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Date: 20 February 2013

Dear Sir/Madam

Re: Swindon Borough Local Plan 2026 Pre-Submission

This letter is the response from Bishopstone Parish Council on the Swindon Local Plan 2026. We understand the need for a Local Plan and that for it to be found “sound” it has to be:

- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

In addition to meeting the tests of soundness, the Local Plan must be legally compliant, and, under the duty to co-operate, it is required that the Local Plan is underpinned by collaborative working with neighbouring planning authorities, including Oxford County Council / Vale of White Horse District Council.

We emphasise that we wish to be constructive; all concerned need to see a sound Local Plan adopted to ensure essential development is brought forward in a managed way. In this respect, we appreciate that SBC choices appear to be limited, but we note the lack of allocation to the West and South of Swindon, both within and outside the SBC area. There is no evidence that SBC has adequately examined reasonable alternatives which could be brought forward to replace the ‘Eastern Villages’ proposals

in whole or part. We believe that there may be other areas in which SBC could better meet its development obligations, and that these should be fully explored in the Plan.

Please note that we wish to attend the Examination in Public.

Further to the above, our response comes in two parts:

1. A copy of the joint response from Bishopstone, Broad Blunsdon, Chiseldon and Wanborough Parish Councils to Policy SD2 of the draft Local Plan.
2. The response from Bishopstone Parish Council, with further detail on the issues which particularly concern us.

Response from Bishopstone Parish Council

We make the following representations on detailed issues regarding the proposed New 'Eastern Villages' allocation which are of concern to us:

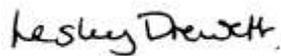
Item	Key concern	Relevant soundness issues
1	Capacity of and traffic impact on A420.	We question whether the plan is effective . The plan should be based on sound infrastructure planning which identifies any improvements which are needed to the A420, and how these will be financed and delivered.
2	Access to A420 from rural communities, both from business and residential proposals.	We question whether the plan is effective . The plan should demonstrate that appropriate access to the A420 will be provided for current and future business and residential communities, and that any capacity issues arising from the development will be appropriately addressed.
3	Capacity of White Hart junction and access to Swindon.	We question whether the plan is effective . It should demonstrate that appropriate capacity will be provided.
3	Capacity of M4 Junction 15 and Common Head roundabout; both are already severely congested at peak times.	We question whether the plan is effective . It should demonstrate that an appropriate large increase in capacity will be provided. As far as we can see, the Plan makes no attempt to model the effect of such a large increase in traffic numbers.
4	There is an acknowledged infrastructure funding gap ('black hole') of c£345m.	We question whether the plan is effective . It is not clear how all of the identified infrastructure improvements can or will be delivered, due to the funding gap. The effect of having the development implemented without 100% of the infrastructure being in place has not been tested or justified.

5	Level of development before new infrastructure provided, timely delivery of necessary infrastructure, with development controls/limits imposed if not forthcoming.	We question whether the plan is effective . The delivery mechanisms and timescales for implementation of the policies should be clearly identified. It should be clear who is going to deliver the required infrastructure and that it will be delivered in a timely manner. We believe that, in order for the plan to be effective, a planning condition requiring infrastructure to be implemented in parallel with development is essential. Failure to demonstrate this should result in controls/limits being imposed on development.
6	Potential for greater use of rural roads, including ‘rat-running’ and overspill traffic – there are implications for speed and safety as well as volume of traffic.	We question whether the plan is effective . Policy NC3 of the plan refers to ‘measures to minimise rat-running through existing adjacent villages and east Swindon. We consider that full details are required of the measures to be provided in and around our area, identifying roads.
7	Urban encroachment, up to district boundary with Bishopstone and Bourton Parish. Loss of strategic gap between villages and Swindon, loss or lack of landscape buffer	We question whether the plan is effective in terms of whether the proposed number of homes can be delivered whilst also meeting the other requirements of policy NC3, including the statement (e) that “The character and identity of Wanborough, Bishopstone and Bourton will be protected by a principle of non-coalescence between the settlements. The land between the Eastern Village site boundary and the existing villages shall remain part of the countryside”. How is this to be achieved?
8	That further unspecified encroachment might arise if identified land cannot accommodate the number of homes proposed	We question whether the plan is effective , in terms of whether the proposed number of homes can be delivered on the land identified without overcrowding, and / or building in the flood plain.
9	The amount of housing permitted on Redlands Airfield, following its late inclusion within the area proposed for development, should be limited.	We understand it to be the Borough Council’s intention that a modest level of development, of between 30 and 50 dwellings, should be proposed for this area and we understand this level of development would be acceptable to Wanborough Parish Council. The Local Plan should therefore specifically state this by requiring a Development Brief, “ for no more than 50 dwellings ”, to be agreed before any planning application can be submitted. Without this amendment, we would argue

		strongly that the Plan is not justified due to the absence of public consultation for this element of the Local Plan.
10	Density of development appears unrealistic, may require greater heights with potential impact on the AONB, or more land not yet specified.	This relates to whether the plan is effective in terms of whether the identified density of an average 40 dwellings per hectare can be delivered whilst meeting the other requirements of policy NC3, including that “the landscape context and views to and from the North Wessex Downs AONB are respected, including potential off-site mitigation”. This density is 25% greater than that recently justified and accepted by the Borough Council at Commonhead and no justification for this increase has been included in the Plan. Further, no indicative master-planning exercise is included to demonstrate the potential impact of this higher density on the AONB and surrounding countryside. Neither is there evidence of any measures which could be put in place to minimise the impact of the development – for example, screening of the periphery by woodland. The excessive density appears to be a simple derivative of housing requirement divided by developable land area and we therefore question whether the Plan is effective .
11	Location of NE Swindon villages in the flood plain.	<p>We question whether the plan is effective in terms of whether the proposed development can be provided whilst meeting the requirement of policy NC3 that “the risk of flooding from the development is minimised, both within the development and at existing neighbouring communities”, and whilst meeting the requirements of policy EN6 (Flood Risk). However, it is worth noting that, surprisingly, the Environment Agency did not raise specific objections to the Eastern Villages proposals on flood risk grounds in their response to the March 2011 consultation. This requires further investigation.</p> <p>There is copious evidence from residents of the area that the historical extent of flooding is greater than indicated on the maps in the Pre-Submission. We consider it unsound that detailed flood risk assessment is to be left to developers, who clearly have a vested interest. We consider</p>

		<p>that an independent study should be carried out to achieve an objective assessment of flood risk, and that this should be made available for public scrutiny.</p> <p>The fact that a significant proportion of the area identified for development is liable to flooding also leads to a question whether the plan represents viable and efficient use of land, and thus whether it is justified as the most appropriate strategy when considered against reasonable alternatives.</p>
12	Waste water treatment capacity and impacts of flooding on it.	We question whether the plan is effective in terms of whether the infrastructure implications of the policies in respect of waste water treatment capacity and impacts of flooding thereon have clearly been identified.

Yours faithfully,



L D Drewett
Clerk & RFO to Bishopstone Parish Council