

Representation Form

 <p>SWINDON BOROUGH COUNCIL</p>	<p>Swindon Borough Council Local Plan</p> <p>Publication Stage (Regulation 19) Revised Proposed Submission Version Representation Form</p>	<p>Ref:</p> <p>(For official use only)</p>
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Please return to Swindon Borough Council by 5:00pm 16 September 2021:

By E-mail to: forward.planning@swindon.gov.uk or

By post to: Planning Policy, Swindon Borough Council, Wat Tyler House,
Euclid Street, Swindon, SN1 2JH

For your comments to be taken as a formal submission you are required to state your name and address. In line with the Data Protection Act 2018, Swindon Borough Council will treat and protect your data in accordance with the Act. If you wish to withdraw or amend your personal data, you will need to contact Swindon Borough Council's Planning Policy team either by email (forwardplanning@swindon.gov.uk) or in writing: Planning Policy, Swindon Borough Council, SN1 2JH. For further information on how your data is handled please visit https://www.swindon.gov.uk/directory_record/23261/planning_policy_privacy_notice

Please note it is not possible for representations to be anonymous. Your comments and your name (and organisation/job title, if relevant), will be publicly available.

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate Part B sheet for each representation you wish to make.

Part A

1. Personal Details*

Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

Title	MRS	
First Name	DEANNE	
Last Name	ROSE	
Job Title (where relevant)	TOWN CLERK	
Organisation (where relevant)	HIGHWORTH TOWN COUNCIL	
Address Line 1		
Line 2	3 GILBERTS LANE	
Line 3	HIGHWORTH	
Line 4		
Post Code	SN6 7FB	
Telephone Number	01793 762377	
E-mail Address	Clerk@highworthtown council.gov.uk	

2. Request for further notification

If you wish to receive notification of Local Plan progress, please specify and tick here:

1. Specified address (e.g. E-mail)	✓
2. Submission of the Local Plan for examination	✓
3. Publication of the recommendations of the Planning Inspector	✓
4. Adoption of the Swindon Borough Local Plan 2036	✓

How did you **first** find out about this consultation?

Council e-newsletter
 Other social media
 Local newspaper (printed)
 Don't remember

Council social media
 Local news website
 Local Radio

Other (Please state):

SBC CABINET COMMITTEE AGENDA JULY 2021

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

4. Do you consider the Local Plan is:

4.(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text" value="√"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="√"/>
4.(3) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text" value="√"/>

Please tick as appropriate

5. COMMENTS

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

NPPF regulations that are in conflict with this allocation.

The NPPF requires Local Plans to “be shaped by early, proportionate and effective engagement” with local communities, as well as statutory consultees. (Paragraph 16). It further states that local planning authorities “should collaborate to identify the relevant strategic matters which they need to address in their plans”. This includes engaging with their local communities and relevant bodies. (Paragraph 25).

The NPPF requires Local Plan Reviews “to be underpinned by relevant and up to date evidence”. It stipulates that such evidence should be adequate, proportionate and focused to justify the policies being put forward” (Paragraph 31).

The NPPF states “planning policies and decisions should aim to achieve healthy, inclusive and safe places which: c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sport facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling”. (Paragraph 92)

Open space and recreation

The NPPF states: -

98. Access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities and can deliver wider benefits for nature and support efforts to address climate change. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport, and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.

99. Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings, or land to be surplus to requirements; or

b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or

c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

100. Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.

101. The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs, and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated and be capable of enduring beyond the end of the plan period.

102. The Local Green Space designation should only be used where the green space is: a) in reasonably close proximity to the community it serves; b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and c) local in character and is not an extensive tract of land.

103. Policies for managing development within a Local Green Space should be consistent with those for Green Belts

Highworth Town Council consider "a suitable location" to be in the Town of Highworth itself.

The NPPF states "Planning policies and decisions should contribute to and enhance the natural and local environment by" (Paragraph 174),

- a) "protecting and enhancing valued landscapes"
- b) "recognising the intrinsic character and beauty of the countryside"

Highworth Neighbourhood Plan

This site is allocated as open space within the Highworth Neighbourhood Plan which was 'made' in 2017. This was supported by the Conservation Area Appraisal and Management Plan (CAAMP). This allocation contravenes these documents which are part of the Development Plan.

The proposed wording from the Borough of the Development Management policies that are applicable and are in conflict with this site allocation.

Policy DM19 Transport and Development

- 3. New development should be located and designed to reduce the need to travel and to facilitate the highest feasible use of sustainable transport modes, prioritising walking and cycling, and provide the potential to maximise bus travel.
- 4. New development will be permitted only where it makes safe and effective arrangements for access by all modes of transport and does not create traffic safety issues elsewhere.

Policy DM20 Infrastructure requirements Resulting from Development

Infrastructure Requirements Resulting from Development Proposals for development will not be permitted unless the infrastructure, including enhancement or extension of existing infrastructure, made necessary as a result of the development is provided either through direct provision or appropriate financial contributions. Such infrastructure needs should consider:

- a. the cumulative impact with other developments;
- b. the impacts of the development on existing infrastructure, environment, and the local community; and
- c. the long-term management and maintenance of infrastructure and mitigation measures delivered as a result of the development.

Policy DM22 Water Supply and Wastewater and Sewerage Infrastructure

- 1. Developers will be required to demonstrate that there is adequate water supply, waste water capacity and surface water drainage both on and off the site to serve the development and that it would not lead to problems for existing or new users. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where appropriate, planning permission for developments which will result in the need for off-site upgrades will be subject to conditions to ensure the occupations are aligned with the delivery of the necessary infrastructure upgrades.

Policy DM24 ICT and Telecommunications

b. the amenities of neighbouring occupiers are not unacceptably compromised;

Policy DM25 Community Facilities

b. the site is accessible to all members of the community and by a range of transport modes including walking and cycling; and

Policy DM26 Green Infrastructure

7.9.1 "The policy seeks to protect and create (and ensure the maintenance of) a multifunctional and connected green infrastructure network. The policy seeks to ensure that within developments green infrastructure is designed in such a way that opportunities to provide connectivity with existing green infrastructure at Boroughwide and local level are taken forward. This policy will increase the level and diversity of community participation in the planning, development, and enjoyment of Swindon's green infrastructure. It is important that access to the green infrastructure network recognises its function and use."

7.9.2" The protection and expansion of trees and woodland could make a significant contribution to climate change adaptation and mitigation (13) and the policy seeks to protect this resource."

DM28 Protecting Open Space

Public open space assets defined on the policies map will be protected from development unless:

- a. the proposed development is ancillary to and protects the main open space function of the site; or
- b. the proposed development is of community facility the benefits of which outweigh the loss of open space; or
- c. the development of a small part of a larger area will provide enhancements to the quality of the remaining open space, without compromising the integrity or role of the open space as a whole; or
- d. the proposed development is supported by an open space appraisal which shows that the open space is surplus to requirements because there are sufficient open spaces in the ward to meet quality

requirements in Appendix 1 and there are alternative open spaces of satisfactory quality within the walking catchments set out in Appendix 1;
or

- e. the proposed development will re-provide open space of at least equivalent size, quality and accessibility, the benefits of which to the community will outweigh the loss.

3. There will be a presumption in favour of retention of undesignated open space, which will include allotments.

Development should not result in the loss of or jeopardise use and enjoyment of undesignated open space.

5. The quality of existing open space should not be eroded by insensitive development on adjoining land.

7.9.7 In accordance with national policy, this policy seeks to protect open spaces, and only allows their loss in specific circumstance.

7.9.8 Access to high quality open spaces, sport and recreation can make an important contribution to the health and well-being of communities. Open space policies contribute towards many of the goals of the Council's Health and Wellbeing Strategy (2017-2022) by supporting residents to make healthy lifestyle choices and reducing social isolation through public open space. Additionally, these policies contribute climate change adaptation and the promotion of sustainable development.

7.9.9 Swindon has many areas of open space not identified as Public Open Space in both public and private ownership, which nevertheless provide important recreational and amenity resources. It is important that these areas are retained where possible.

Policy DM 29 Open Space in New Development

5. Playing pitches should be provided in accordance with the needs identified in the Swindon Borough Playing Pitch Strategy.

Policy DM 30 Biodiversity

1. All development shall minimise its impact upon and must secure measurable net gains for biodiversity, including protecting, restoring, and establishing coherent ecological networks that are more resilient to current and future pressures, including through the design and layout of buildings.
2. The effect of development proposals on the sites and species identified in the table below must be assessed and protection commensurate with their designation or status (identified in the table below) and in accordance with national policy will be given.
3. National policy and applicable legislation on habitats and biodiversity – including the 'mitigation hierarchy' of avoid, mitigate, compensate – will be applied in the determination of planning applications. Irreplaceable habitat should not be lost unless there are wholly exceptional reasons, and a suitable compensation strategy exists.
4. All developments must secure a minimum of 20% measurable net gains for biodiversity or as set out in legislation, whichever is the greater. Net gain should, where possible, seek to link to adjoining priority habitats, or support nearby priority species.

Policy DM 31 Landscape

1. Proposals for development will only be permitted when: a. the intrinsic character, diversity and local distinctiveness of landscape within Swindon Borough and adjacent area are protected, conserved and enhanced;

- c. unacceptable impacts upon the landscape are avoided

Policy DM32 Historic Environment

1. Swindon Borough's historic environment shall be sustained and enhanced. This includes all heritage assets archaeological remains, listed buildings, conservation areas, registered parks and gardens, scheduled monuments, as well as locally listed buildings and other non-designated heritage assets.

2. Proposals for development affecting heritage assets shall conserve and, where appropriate, enhance their significance and setting. Any harm to the significance of a designated or non-designated heritage asset must be justified. Proposed development will be weighed against the public benefits of the proposal; whether it has been demonstrated that all reasonable efforts have been made to sustain the existing use, find new uses, or mitigate the extent of the harm to the significance of the asset; and whether the works proposed are the minimum required to secure the long-term use of the asset representing their optimum viable use. Outline applications will not generally be acceptable for development affecting heritage assets.

7. Archaeology Development proposals affecting archaeological remains, will be conserved in a manner appropriate to their significance. Appropriate assessment and evaluation should be submitted as part of any planning application in areas of known or potential archaeological interest. Development should not cause loss or harm of Scheduled Monuments and other nationally important archaeological sites or harm their setting. Those sites currently known are identified on the local development plan. Development proposals affecting archaeological remains of less than national importance will be conserved in a manner appropriate to their significance. Any Harm to archaeological remains will need to be justified. Where permitted, in response to proposed loss or harm, provision for mitigation, which may include preservation in situ or excavation will be required but should not be determinative of accepting harm.

Policy DM34 Flood Risk

National policy and guidance on the requirement for a site-specific flood risk assessment, which should assess the risk from all sources of flooding, and on the sequential and exception tests (and where appropriate the sequential approach), will be applied in the consideration of planning applications.

Policy CC1 Adaptation to Climate Change

1. All new development, including building conversions, refurbishments, and extensions, should seek to minimise the carbon and energy impacts of their design and construction. Proposals must demonstrate that they are seeking to limit greenhouse emissions through location, building orientation, design, landscape, and planting, taking into account any nationally adopted standards.

2. All new development should be designed to improve resilience to the anticipated effects of climate change. Proposals should incorporate measures that address issues of adaptation to climate change taking account of best practice. These include resilience to increasing temperatures, rainfall and wind speeds, and the need for water conservation and storage.

The key strategy objectives set by the Borough that are in conflict with this site.

The Borough has set out a set of key strategic Objectives which guide the Local Plan. (Page 6, section 3.2). Those that are particularly relevant to this allocation are: -

Strategic Objective 1: High Quality Sustainable Development – to improve the image of Swindon, enable inclusive communities and address climate change by the provision of high quality, well designed and sustainable development.

Strategic Objective 2: Infrastructure - to meet the infrastructure needs for and arising from the growth of Swindon (including health and community needs) in a timely and coordinated manner and being adequately funded.

Strategic Objective 4: Housing - to meet the Borough’s housing needs by the provision of well-designed sustainable housing, at sustainable locations and at a range of types and densities according to local needs and circumstances, and that promotes the effective use of land.

Strategic Objective 5: Education - to meet the need for education provision arising from the anticipated growth in population and to enable an improvement in skills and qualifications, particularly through the provision and support of tertiary education opportunities

Strategic Objective 6: Community and Health - to promote healthy lifestyles and to meet the need for community and health facilities arising from growth and demographic change in the Borough

Strategic Objective 7: Transport - to support Swindon’s growth on a sustainable basis through the provision of a transport network that ensures walking, cycling and public transport offer the most attractive choices, and is efficient safe, affordable, accessible, and easy to understand.

Strategic Objective 8: Culture and Leisure - to enable the provision of cultural and leisure facilities commensurate with Swindon’s size and growth in population and realise Swindon’s potential as a regional leisure destination

Strategic Objective 9: Green Infrastructure - to provide an attractive and inspirational environment to live, work, learn and play, by the provision of a far-reaching network of connected and multi-functional green spaces linked to the wider countryside.

Strategic Objective 10: Natural, Built & Historic Environment -to ensure that development respects, enhances, and conserves the best of the existing built, historic, and natural environment in the Borough.

Highworth Town Council object to the allocation on the following grounds: -

1. It is noted that Policy LA34 is not one of the allocated sites or promoted sites within the emerging strategies process, regulation 19 part 1 and is neither supported by evidence or been subject to public consultation before the inclusion within this plan. The site has not been subject to proper scrutiny by the local community, including the Town Council as a stake holder.
2. There is no evidence that this site is needed to make up the numbers.
3. The site is protected open space within the Highworth Neighbourhood Plan, supported also by the Conservation Area Appraisal Management Plan (CAAMP) and NPPF.
4. Highworth Golf Course is a registered Community Asset with the Borough and many local people including the Highworth Junior Football Team and Highworth Town Council have approached the Borough Council to use the land for sport/recreational/healthy lifestyles purposes following Twig Markets relinquishing of the lease early, actually 5 years in to a 15-year lease. The Borough did not want to engage with Highworth Town Council or members of the public to discuss other uses. The community of Highworth have so many aspirations for the Highworth Golf Course and have prepared some detailed plans in preparation of the land becoming available as this was blatantly obvious for a few years as it was allowed to be run down. Some of the ideas that were put forward are: -

Extension of the Junior Football Teams pitches (desperately needed and would support the Playing pitch Strategy)

Statutory Local Nature Reserve

Community Forest

A community mans shed (The old Golf Course building)

A trim trail for runners

A café (The old Golf Course building)

An information and Study Centre (The old Golf Course building)

5. The site forms part of the urban fringe of Highworth which is deemed to be a valid landscape for many purposes, including walking. The Policy states at Point i).

"is informed by the need to protect the hilltop setting of Highworth, to safeguard vistas to distant landscapes and local features, and to integrate the scheme sensitively with existing neighbourhoods"

This implies that the hilltop and views looking down from the top of the site are recognised of significant importance by the Borough having themselves written this into the policy.

6. There is no evidence in the sustainability appraisal for the need for the Primary School. This is a concern as it may become more houses.
7. The site will be accessed from a very busy 'A' road (Swindon Road) raising concerns of highway safety and congestion in and through the town, this is likely to be significant and has not been supported by any traffic surveys prior to inclusion in this plan.

8. Existing Highway Infrastructure is inadequate e.g., the Fox Roundabout junction from all directions, the high street traffic lights from all directions etc. Following traffic surveys from previous applications they have already been identified as functioning above capacity and at a severe level. There is no detailed Infrastructure delivery plan to identify Highway upgrades to support this development. It should also be considered on the impact of Blunsdon which in the sustainability appraisal document identifies from key stakeholders like Highways England that the junction of the Cold Harbour is already at capacity and this site will have an impact as it is one of the main routes out of the Town. It will inevitably have an effect on the Rat Trap and Kingsdown Crossroads too which are already congestion pinch points.
9. Developer contributions have not been identified through a comprehensive Infrastructure Delivery Plan to mitigate this development. This is a fundamental evidence-based document that is expected with large scale development and should be available for scrutiny alongside the plan.
10. There is no evidence as no assessment has been carried out to suggest that this allocation can accommodate water supply and waste disposal. This is of real concern particularly as we know that this is already a problem in Highworth, and this site does not have any network in place.
11. There has been no site assessment for flood risk. The Highworth Golf Course is known to be very boggy in certain locations. The flood risk assessment stipulates that new development should not be in locations which are subject to significant flood risk, taking into account climate change.
12. There is an access onto the Highworth Golf Course from Roman Road. This indicates it is highly likely that the site having archaeological remains although no assessment has been mentioned or carried out. In the sustainability appraisal it states in Table 3. 6. "Protect, maintain and enhance the historic environment".
13. The car parking in Highworth is already a problem and an increase of this number of cars will undoubtedly cause mayhem.
14. The distance to the Doctors surgery is outside of the accepted distances. This will mean that most will go by car, this is contrary to the meaning of sustainable development.
15. The Doctors surgery is operating above capacity, there are very long waiting times for an appointment and there are real concerns with the proposed growth of the town.
16. The nearest supermarket is not in easy walking distance and therefore does not support sustainable development.
17. There is concern that already low speeds for effective use of the internet will be affected by further development.
18. The disruption to wildlife habitats. The Habitats Regulation Appraisal (HRA) Dec 2019 does not include this site. Development on this site is at odds with the Great Western Community Forest objective which the Borough committed to.

19. No Biodiversity assessment has been carried out. This is even more important since the site has rewilded since the closure of the Golf Course
20. No soil assessments have been carried out. The SA states at table 3 "Use land and existing buildings efficiently, avoid high quality soils and prioritise development on previously developed land".
21. The site has several public rights of way.
22. The report from the SHELAA used as evidence for this plan looked at a site on the entrance to the Highworth Golf Course for a development of up to 5 dwellings. The outcome from that assessment is stated as follows: -

"The site is located adjacent to the rural settlement boundary and within the Highworth Neighbourhood Plan area. The site is located within an area of designated Open Space on the Swindon Borough Local Plan Key Policies Map, therefore Policy EN3 applies. Site is also designated as open space within the Highworth Neighbourhood Plan. An open space appraisal will be required to demonstrate that loss of the site does not adversely affect local needs and/or existing quality of open space within the area, or that alternative provision can be made locally of equivalent or better size, quality, and accessibility. Site contains vegetation which would need to be cleared. Site provides a shared access to the Rec and Golf Club. Any development would need to be mindful of potential amenity issues with regard to use of the adjacent recreation ground."

Highworth Town Council note the above site has been taken out of this final draft.

At the recent public consultation events, the Borough Council displayed a masterplan for the site, note this is not available on their consultation portal so only those that attended the events will be able to scrutinise them. Highworth Town Council were not aware of the site being considered, there was no engagement and the first time they were aware was when the draft plan was presented to cabinet on the 7th July. The masterplan raises concerns which are detailed below: -

1. The extent of built development appears to be larger than the 30% restriction.
2. The location of the proposed Primary School will impact on the existing Junior Football Club being able to expand next to their clubhouse. The Junior Football Club have already approached the Borough in this regard. The need for additional pitches is identified within the Playing Pitch Strategy used as evidence for this plan. It identifies the shortage of playing pitches and 3G pitches in the Borough. The evidence states for every 1000 people 0.8 hectares of additional playing pitches will be required.
3. The location of the proposed open space (70%) is not easily accessible by the elderly and less mobile people in the community. This is important given Highworth's ageing population and the topography of the land.
4. The location of the proposed open space utilises the part of the site which is poorly drained and very boggy in winter. The Highworth Golf Course is used extensively by the community and people come from out of town to

use it too. It is proven to be invaluable for physical and mental health for people of all ages and mobility and the loss of this amenity is of grave concern to Highworth Town Council.

Highworth Town Council are not supportive of this allocation and make comment on the Policy without prejudice.

1. Land at Highworth Golf Club is allocated for about 350 dwellings and should make provision for:

Without prejudice Highworth Town Council wish to point out that this statement leaves the quantity open ended. It has been proven that this additional site is not required however it should be clear in a policy of the maximum. In addition to this the sustainable appraisal document at Table 10 states 10 hectares are developable of the 40-hectare site and yet the local plan states no more than 30% will be developed which equates to 12 hectares.

b) should read

The remaining 70% of the land to be protected and enhanced open space that is easily accessible at all times of the year for the benefit of the public. This site will never be developed but kept as open space in perpetuity for the Town of Highworth.

c) Highworth Town Council without prejudice state this contribution should not be solely ring fenced for Highworth Recreation Ground but be able to be used within the Town of Highworth.

d) Add - Adequate financial contributions to improving the Highway network in Highworth to ease congestion caused by the development.

g) a 2 FE Primary School required to support the growth of Highworth to be provided early in the development to support the growth of Highworth: and

Highworth Town Council without prejudice wish to point out that the site has been put forward on the reliance of Highworth having a secondary school and yet it does not expect to contribute to improvements to the school. Highworth Town Council expect this should be part of the policy requirements and therefore it needs including in point g).

h ii) This should be changed to.

Provides high quality development of mixed type, to accommodate local need, that is designed to reduce the carbon footprint in recognition of climate change, and that respects the location as a key gateway to Highworth.

Add

i)The loss of open space resulting from the proposed development should be replaced by equivalent or better provision in terms of quantity and quality in a suitable location in Highworth.

(Continue on a separate sheet /expand box if necessary)

6. MODIFICATIONS

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Highworth Town Council consider the allocation should be removed from the Local Plan.

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Highworth Town Council consider that the Local Plan Review must be subject to scrutiny and presenting their concerns in front of the Inspector is the best way to achieve this objective given their role in representing the whole community.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.