

## Representation Form

 <p><b>SWINDON</b> BOROUGH COUNCIL</p>	<p><b>Swindon Borough Council Local Plan</b></p> <p>Publication Stage (Regulation 19) Revised Proposed Submission Version Representation Form</p>	<p><b>Ref:</b></p> <p><b>(For official use only)</b></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](mailto: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](mailto: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](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.

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# 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	<input type="checkbox"/>	Other social media	<input type="checkbox"/>	Local newspaper (printed)	<input type="checkbox"/>	Don't remember	<input type="checkbox"/>
Council social media	<input type="checkbox"/>	Local news website	<input type="checkbox"/>	Local Radio	<input type="checkbox"/>		

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 requirements**

The NPPF states that the supply of specific deliverable housing sites should in addition include a buffer i.e. 5%,10% or 20% dependent on a specific situation. (Paragraph 74). Highworth Town Council note that the 20% buffer requirement relates to the situation where there has been a significant under delivery of housing over the previous 3-year period.

The NPPF, as a footnote (41) refers to the application of the 20% buffer in the situation where a Local Planning Authority has delivered below 85% of its housing requirement. Highworth Town Council is aware of the Borough Council's Housing supply situation where the document by the Ministry of Housing and Local Government document entitled "Housing Delivery Test: 2020 measurement" states that it has achieved 95% delivery in its housing requirement.

#### **Over supply of Housing**

In July 2021 a report on the Local Plan Review was presented to Borough Councillors at the meeting of their Cabinet Committee. The Officers report refers to a 20% buffer equating to 21,400 additional dwellings being required (Paragraph 3.14). This figure is adjusted later in the document (Paragraph 3.17) where a figure of 21,600 dwellings is given. It notes that the Land at the Forty is being reduced to 5 dwellings from an original figure of 30. It then goes on to say,

"in order to secure delivery over the Plan period an additional site has been identified at Highworth Golf Course for about 350 dwellings consistent with the proposed development strategy". This site is owned by the Borough.

Highworth Town Council do not accept the requirement to add in another large site at this final stage as the figure being delivered within this plan is far beyond what is required. The NPPF gives specific criteria in order to assign the buffer % and the numbers proposed in this Plan do not meet the criteria.

The figure of 21,600 includes the Shrivenham Road site (LA19) which states 200 in the Plan and has been granted planning permission for 250 which is subject to a legal agreement.

Highworth Town Council consider that the over inflated figure will have a significant impact on Highworth and the Borough as a whole.

Highworth Town Council do not accept that the provision of housing in the Town is required at such a level. In the Local Plan Review Strategic Objective 4 (see below) it refers to local needs and circumstances. It has not been demonstrated with evidence that development is needed at such a high level.

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.

(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 that the Local Plan Review is fundamentally flawed, therefore it should be withdrawn, and The Borough Council required to undertake a significant review of the Local Plan Review.

(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.