

**Representations by Swindon Chamber of
Commerce to Wiltshire Council in respect of the
Wiltshire Local Plan Review Pre-Submission Draft
2020-2038 – (Regulation 19)**

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1.0 Introduction and Background to Swindon Chamber of Commerce

- 1.1 Swindon Chamber of Commerce (SCC) is the British Chamber of Commerce (BCC) accredited Chamber for the Swindon area. SCC are part of the Thames Valley Group of Chambers of Commerce (TVCoC) based along the Thames Valley corridor from west London to Swindon which collectively represents over 4,000 businesses and 5,000 active trade customers as part of its wider membership, many of whom have business interests or are represented in the Swindon area. TVCoC is recognised as the leading voice of business representing micro to major multi-international organisations and is a centre of excellence providing international trade services and global representations committed to long term relationships with its members and providing them with relevant value-added services that assist, support and protect regional, national and international business.
- 1.2 Whilst Swindon is located in the northeastern corner of Wiltshire, SCC firmly believes that in economic terms Swindon is very much aligned to the south east, particularly the Thames Valley corridor, whilst also extending westwards beyond Swindon towards Chippenham, Bath and Bristol.

2.0 SCC's Engagement in the Development Plan Process

- 2.1 SCC has played a key part in the Development Plan process over many years at a national, regional and local level. During that time, it has submitted representations and appeared at Public Examinations in Swindon and the surrounding area, notably Wiltshire. As noted in Section 1 of these representations, Swindon's economic hinterland extends extensively not only into Wiltshire but also into Gloucestershire, Oxfordshire and West Berkshire and representations have been made in these areas as gauged appropriate to SCC's member interests.
- 2.2 In December 2017 SCC submitted representations to Swindon Borough Council in respect of the Swindon Local Plan Review 2036 and also jointly to both Swindon Borough Council and Wiltshire Council in respect of the Wiltshire Joint Spatial Framework Issues Paper of November 2017. It is perhaps appropriate to note that previously, SCC, in respect of the Swindon Local Plan 2026, had made representations at the consultative and submission stages expressing serious reservations to the failure of the Local Plan to provide a long term strategic framework within which to make investment decisions, particularly in respect of major infrastructure and land allocations for both housing and employment, and to establish strategic priorities as required at the time by National Planning Policy Framework (NPPF).
- 2.3 SCC were also concerned at that time (2013) at what it perceived to be a lack of focus addressing the strategic priority of providing sufficient new employment land and, in addressing this particular issue, the lack of cross border working between Wiltshire Council and Swindon Borough Council to identify appropriate sites as well as addressing the housing needs of Swindon on a rational Housing Market Area basis. SCC consequently urged the Inspector at the Public Examination to call for an early review of the Plan in order to facilitate these issues being addressed as a matter of urgency. This view was supported, and the Swindon Borough Local Plan 2026 contained a clear commitment in its adopted form to an early review by 2016, a

timescale that has already passed by 7 years. Perhaps more significantly, the Joint Framework has now been abandoned by both Councils and cross border issues will be dealt with by a proposed Statement of Common Ground. SCC has serious reservations about this development which are addressed in these latest November 2023 representations.

2.4 In July 2017 SCC/TVCoC submitted representations to Swindon Borough Council in respect of the [Swindon Economic Strategy](#) consultation. Whilst broadly supporting the Council's economic vision for Swindon, a number of serious concerns and reservations were expressed these can be broadly summarised as follows:

- The Council's overall Economic Strategy will by necessity be very heavily influenced by Swindon Council's land use planning and, because of the fact that Swindon's urban area already extends across the administrative boundary into Wiltshire in the west, will be dependent upon Wiltshire Council jointly addressing cross border issues in conjunction with Swindon Borough.
- The current Local Plan Review process (in both Swindon and Wiltshire) is only addressing a time horizon of 2036 and this, based on SCC's past experience, is a wholly inadequate timeframe for both long term economic and spatial development strategy and infrastructure planning.
- Consequently, SCC called for a longer term 2050 vision that maximises the potential to align economic, spatial and land use planning to provide the framework for long term strategic planning and infrastructure provision. In particular, SCC suggested that:
 - a) As part of an overall 2050 vision the (Swindon) Council's Local Plan Review should also address long term strategic planning issues and develop an appropriate accompanying strategy for meeting the development needs of Swindon to the 2050-time horizon, and
 - b) That this would facilitate an Economic Strategy dealing with long term infrastructure improvements that will be essential in order to attract foreign direct investment and other inward investment to the town and to deliver the aims that both business community and Swindon Borough Council aspire to.
- The Council should identify, plan positively and help deliver serviced land for employment purposes, particularly large-scale business operations.
- Based on the evidence of the past, including the "Silver" and "Gold" Reports of the 1960's, and as expressed through documents associated with the subsequent Development Plan Review process over many years, that further development to the town in a westward direction may offer the only sustainable direction of the future expansion of Swindon in the long term.
- Encourage and commend the Council (jointly with Wiltshire Council) to be ambitious and set challenging, but realistic targets. A full copy of those representations were appended to the December 2017 submission to Wiltshire & Swindon Councils.

2.5 As a result of SCC's representations on the Economic Strategy, the SBC Swindon Development Delivery Panel took the matter up and raised a formal written question to the Cabinets of both Swindon Borough Council and Wiltshire Council as follows:

"Swindon Development Delivery Panel (SDDP) has expressed its concern that SBC Economic Strategy has a timeline to 2026, Wiltshire and Swindon's Local Plan

programmes have timescales to 2036 whilst organisations such as Highways England, who are responsible of the planning and delivery of key infrastructure, have Investment Strategies to 2050.

Bearing in mind the urgent need for infrastructure to support the development needed to maintain prosperity associated with growth of Swindon, the SDDP would like to see a long-term strategic vision to 2050 and alignment of economic and spatial planning timescales to this date. This has already been called for by Swindon Chamber of Commerce (SCC) in their representations to the draft Economic Strategy. What are Cabinets views on the appropriateness of this, bearing in mind the amount of employment and housing development that would need to be accommodated in the period to 2050 and the position of the administrative boundary between the two authorities?"

2.6 The written response by the two Cabinets to this question were as follows:

Swindon Borough Council response:

"Thank you for your question. Long-term planning for housing, infrastructure investment, and the economy is essential. Our adopted Local Plan looked at options to 2026 and within a year of it being adopted we started work on our Local Plan Review. This new Plan, working in conjunction with Wiltshire Council, will extend our horizon to 2036. This will enable both local authorities to support managed housing and business growth. Over the coming months we will also look beyond this time frame, and I am happy to work with a wide range of stakeholders in developing these ideas.

I can confirm that we are currently undertaking work with key stakeholders, which includes the Swindon Development Delivery Panel, on a plan that extends up to 2050; however, these negotiations are still in an early stage of development."

Wiltshire Council response:

"The plan horizon for the Wiltshire Local Plan Review is 2036. This reflects government policy within the National Planning Policy Framework for Local Plans to relate to an appropriate timescale, "preferably a 15-year time horizon". Predicting local household formation and population growth over a much longer timescale of more than 30 years would not be realistic. However, it is an important part of strategic planning to ensure that decisions are not made through any Local Plan that would compromise the ability to plan for the development needs of the County beyond that timescale.

At this stage, as it is unclear what future growth needs may be beyond 2036, our current focus must be to ensure that we have a clear strategy in place for the period to 2036. In doing this, we are committed to joint working with Swindon Borough Council through the preparation of the Joint Spatial Framework, which will inform the review of both authorities' respective plans.

We recognise that longer term strategic planning and investment in infrastructure is important to ensure that we have sufficient headroom in capacity and are forward thinking enough to be able to respond to future development needs of the County in a timely way."

These specific responses have not subsequently been formally withdrawn or superseded and remain in place.

- 2.7 In August 2019 SCC submitted further views to Wiltshire Council along similar lines to the above in response to a further consultation exercise undertaken at that time. This was repeated again in March 2021 in respect of the Emerging Spatial Strategy Options. SCC's position in March 2021 remained relatively unchanged and the representations submitted to that document were very largely based upon a document entitled **"Swindon Chamber Council – Local Policy Priorities 2021"**.
- 2.8 It was clear from the foregoing that SCC remained firmly of the view that a long-term vision needs to underpin the Local Plan Review process of both Wiltshire and Swindon Local Plan Reviews, certainly as far as it affects the Swindon economic sub-region. As a result of changes to NPPF, which SCC recognises, the Joint Framework had been abandoned in favour of a Statement of Common Ground. However, SCC did not consider this, on its own, to be an adequate substitute for strategic joint working. Unfortunately, this has continued through to the current Regulation 19 consultation process.

3.0 The Swindon Economy

- 3.1 For many years Swindon has been viewed as an economic success, with its physical and economic development being noted in both the national as well as the regional and local context. Historically the town has created jobs leading to labour and skill shortages and demographic analysis indicates that there has, over a long period of time, been steady net inward migration of economically active people into the wider Swindon Housing Market Area as a result of the economic success of the town.
- 3.2 2019 unfortunately heralded the announcement by Honda Manufacturing UK that production would cease at its Swindon factory in July 2021 with significant job losses, both directly within Swindon and over a much wider area as part of the impact of the factory closure on the supply chain.
- 3.3 SCC believed that it was of paramount importance that the planning framework in Swindon along with that in neighbouring areas, such as Wiltshire, West Berkshire and Oxfordshire where significant business linkages exist, remained positive and conducive to attracting inward investment to fill the void that was inevitably left by the demise of Honda's presence in the town. SCC was actively engaged with the local authorities and government agencies in the Working Party addressing the various issues that arose from the closure to ensure that the impact on the workforce, the community and the local economy was managed in the most effective way.
- 3.4 The success of this engagement by SCC is reflected in the fact that the former Honda site was secured for future employment use and acquired by Panattoni, who have subsequently secured a comprehensive planning approval to redevelop the site as a major logistics park. It is anticipated that this will ultimately produce more jobs on the site than existed when Honda UK were manufacturing at their maximum output. This was duly reflected in an article in the Sunday Telegraph when their Business Editor carried out a twelve-month late feature about life after Honda. This is reproduced as Appendix C.
- 3.5 The Sunday Telegraph article clearly shows that Swindon recovered very quickly from the Honda

closure and continues to maintain economic growth. What may have looked like a major setback has been turned into an economic opportunity and Quarterly Business Survey results continue to indicate that businesses in Swindon still experience severe staff recruitment difficulties because of the tight job market at November 2023.

- 3.6 At the time of the closure, SCC made it clear that the implications of the Honda factory closure should not be viewed as a signal for a significant downturn in the economic performance of the town as a whole. SCC were aware of a number of significant potential inward investment opportunities that were likely to help to fill the void that was inevitably left initially by the Honda factory closure, and, in the long term, the future prospects remain good for the town. It is particularly important in the context of Swindon's economic setting within the Thames Valley context, where there are a number of very strong linkages between the wider Thames Valley area and Swindon.
- 3.7 Interestingly, Swindon was included in the "Western Powerhouse" initiative which, although not perhaps fully acknowledging Swindon's economic strength in a Thames Valley context, did nonetheless underline the fact that Swindon lies at the crossroads of not only communications, but also centres of business activity and its previous recognition as the "engine room of the south west" remains important to authorities to the west of the town, notwithstanding the fact that Swindon business follows the profile of the town itself in reflecting more of a south east economy than south west.
- 3.8 SCC firmly believes, therefore, that both the Wiltshire Local Plan Review 2038 (and the Swindon Local Plan Review 2036 to date) both lack sufficient long-term vision, strategy and guidance as they are emerging at the present time. A more over-arching, comprehensive, and longer term strategic joint approach is needed, particularly to secure the investment in strategic infrastructure that Swindon needs to maintain its competitive role in the local economy.

4.0 The Emerging Spatial Strategy Options of March 2021

- 4.1 SCC did not wish to enter into site specific debate and kept its concerns on this consultation and subsequent representations on this document to only that part of Wiltshire that fell specifically within the economic sub-region of Swindon. In effect, this is the area extending to Marlborough, Royal Wootton Bassett, Purton and Cricklade encompassing the market towns and villages to the west of Swindon. This is fairly well reflected by the Swindon Housing Market Area as defined by both Wiltshire and Swindon Councils.
- 4.2 The emerging spatial strategy options in March 2021 in this respect addressed only a residual Wiltshire-specific housing requirement as Swindon Borough Council, in line with NPPF advice and the standard methodology for assessing housing need, had opted to "consume its own smoke" and meet its own housing provision requirements.
- 4.3 Consequently, SCC did not believe that the strategy for housing delivery at Swindon was appropriate in the circumstances. The same point was applicable to the lack of an over-arching strategy for delivery of employment land to meet inward investment needs. Swindon has a limited physical boundary and identification of new employment sites has historically proven difficult. Although the former Honda site has been maintained as a major employment area, it only replaced the former manufacturing facility and is not new, additional land. Local

commercial agents have for many years been calling for new allocations of employment land to be brought forward, pointing out as they have done so, that this needs to be accompanied by new infrastructure and this will not be delivered by short term “hand to mouth” planning; a more long-term framework is required for this to happen.

- 4.4 The implications of these points to both Councils that were made in response to the March 2021 consultation were that closer joint working was required to provide the long-term vision and strategy as a framework for infrastructure planning and proper cohesive and coordinated spatial development (at Swindon). This has simply not happened, and the current approach being adopted by both Councils is not consistent with the answers given to the written questions tabled to the Cabinets of both Councils in October 2017 (see paragraphs 2.5 and 2.6 of these representations). SCC will, therefore, continue to press for this to be provided by both Councils.

5.0 SCC Response to the Regulation 19 Consultation September - November 2023 - Overview

- 5.1 SCC is disappointed to see that Wiltshire Council have chosen to produce a Local Plan Review that has in many ways failed to recognise the fundamentally important role that Swindon plays in the northeastern part of Wiltshire and beyond, especially in economic terms. As a general comment SCC would express both disappointment and surprise that both Swindon and Wiltshire Councils seem to be focussed on insular approaches to planning, thereby failing to jointly provide a comprehensive spatial and economic framework for the greater Swindon area. This is particularly surprising when one reflects on the fact that substantial elements of what appears to the layman or casual observer parts of the Swindon urban fabric (to the west of the town) are, in fact, built on sites within Wiltshire’s administrative area.
- 5.2 It is quite remarkable that although Swindon is the largest urban area within the County of Wiltshire, and notwithstanding that a substantial part of that urban fabric lies within Wiltshire administrative area, the town is not recognised as a Principal Settlement (see para 2.1 of the Local Plan “Spatial Strategy” at page 14 of the document). Swindon is a large urban area of population, the major focus for employment and a major transport hub for the eastern end of Wiltshire, providing the only main line rail station within a 25-mile radius). This failure to recognise the significance of Swindon as a Principal Settlement is consequently reflected in all of the subsequent
- 5.3 SCC is of the view that failure to fully recognise the strategic importance of Swindon and the importance of its connectivity, west, east (towards Heathrow) and north (into Oxfordshire), in community, economic and spatial/planning terms may contribute to Swindon Borough Council failing to deliver an appropriate quantum of new housing to meet the growth in jobs in the local economy and the failure to deliver appropriate quantities of strategic employment land for future inward investment. Similarly, failure to establish a long-term strategy will inevitably lead to a failure to identify and deliver essential infrastructure to support sustainable strategic economic growth at Swindon. It is important to ensure that further new strategic employment sites are identified and delivered in the longer term and the absence of any joint strategic working between the two authorities means that the opportunity to consider strategic options to the west of Swindon have been discarded, either as a contribution to helping Swindon Borough meet their housing and employment needs or to meet only that element of the Swindon HMA housing requirement and any associated new employment land attributable to Wiltshire.

- 5.4 SCC believe that Wiltshire Council should quite correctly address the issues of meeting identified local housing needs in the wider rural area and principal settlements and market towns as listed in within the Swindon Market Housing Area, but this list should start with Swindon. However, at present the spatial strategy does not make reference to Swindon, let alone develop this into a comprehensive strategy aimed at providing for Swindon's short term, let alone long term, development needs.
- 5.5 Paragraph 4.221 makes reference to the fact that no request was made by Swindon Borough Council for Wiltshire to assist in meeting spatial (i.e., housing and employment) needs and the Review seems to accept this without question. It may be significant to note at this point that this reflects the views of Swindon BC at March 2021, but as a result of May 2023 local elections there is a new administration in place in Swindon.
- 5.6 Regard has also been given to the current overarching planning advice contained in the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG) as well as subsequent Government publications relevant to spatial and economic planning.

Swindon HMA and Joint Working

- 5.7 SCC notes that the previous target for the Wiltshire Local Plan Review outlined in the 'Emerging Spatial Strategy' consultation (2021) was to produce a strategy which will accommodate between 40,840 and 45,630 new homes in the county for the period 2016-2036. However, Wiltshire's emerging framework states that "the standard method has been calculated to forecast a need for 36,740 additional homes over the period 2020 to 2038". It is also acknowledged that the Government are reviewing the method used to calculate housing need, so these figures are subject to change.
- 5.8 The original intention between Wiltshire Council and Swindon Borough Council to produce a Joint Spatial Framework, see our comments on this [earlier consultation](#), for the Swindon HMA has now given way to the two authorities both producing Local Plans for their own respective administrative areas. This is rejecting the potential for utilising opportunities in the Wiltshire part of the Swindon HMA adjacent to the Swindon urban/built up area to provide housing to meet the needs of the Swindon housing market. Paragraph 35 of the NPPF states that for Plans to be considered 'sound', strategies should be "informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated". Therefore, Wiltshire Council not considering how those parts of Wiltshire lying within the Swindon HMA and particularly adjacent to the Swindon urban area can deliver housing to meet Swindon's identified needs is a policy matter of poor choice. These areas, lying as they do immediately adjacent the Swindon built up area, are the most sustainable options in terms of proximity to services and community facilities and also in terms of journey to work. This is a development strategy completely disregarded in the Regulation 19 consultation.
- 5.9 The standard methodology for estimating housing need also does not preclude Local Planning Authorities achieving more than the minimum number to achieve the national target of 300,000 new homes a year. In fact, it is widely recognised that for the Government to achieve its 300,000 homes target ambition, LPAs will almost certainly need to plan for more housing than the standard methodology will yield. The PPG also states that the LHN calculated using the standard method is only a minimum target and not a housing requirement. Indeed, the recently published Emerging Spatial Options Consultation material stated that **"...sustainability appraisal assessment...concludes that there are no adverse effects of such significance that would prevent the higher figure [i.e., the Local Housing Needs Assessment figure] being progressed"**.

SCC would commend considering a strategy that delivers housing in excess of the standard methodology figure in the interests of ensuring not only housing choice, but also adequate housing to maintain the People/Homes and Jobs balance, keeping in mind the labour and skills shortages still prevalent in the Swindon area (see Chamber of Commerce Quarterly Survey results) over a long period of time. This is reinforced by national policy, where NPPF Paragraph 61 states that with regards to housing, “any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.”

- 5.10 Therefore SCC has concerns as to the overall housing estimates, particularly for the Swindon Housing Market Area, and believes that in reality the residual calculation is likely to be considerably higher than that put forward in the current consultation papers. Whilst most of the detailed evidence for this relates to calculation of housing need figures for Swindon (which there has been no update to since the jointly produced Local Housing Needs Assessment 2019), SCC notes that the same concerns may also be relevant as far as they relate to future housing numbers within the Wiltshire part of the Swindon Housing Market Area. Of particular concern is that there are concerns that the failure on the part of both Wiltshire Council and Swindon Borough Council to examine the performance of the current strategic allocated sites and critically review the likelihood of delivery from these sites moving forward to 2036. Instead, the approach by Swindon Borough Council appears to be one of acceptance that they will deliver in accordance with an estimated trajectory. SCC has continually expressed concerns about this aspect and development delivery continues to be extremely poor and a very long way behind repeated forecasts of the last 10 -15 years.
- 5.11 The combination of these various factors would suggest that much closer cross-border working by the two authorities working in consultation with business and other key stakeholders to evolve a genuinely joint strategy that takes advantage of the most suitable and sustainable areas for development, irrespective of the respective Local Authority administrative boundaries, is to be preferred. This would be wholly consistent with various strategic planning reviews covering Swindon and Wiltshire over the last 60 years, taking into account a variety of successive evidence bases.
- 5.12 In effect, Wiltshire Council has produced a Local Plan Review covering the Swindon Housing Market Area whilst at the same time demonstrating a complete disregard to the housing (and employment) needs of Swindon itself; all that is being addressed is the residual requirement for the market towns and villages in the Wiltshire part of the HMA, leaving Swindon to “consume its own smoke”. This cuts across the fundamental principles of sustainable development which would, from the outset, suggest that this is most likely to be achieved by concentrating development at the major urban centres (i.e. Principal Settlements), of which Swindon is the largest in the County, although not recognised by Wiltshire Council in the context of its Local Plan Review (see Policy 1 and Key Diagram). Consequently, as Policy 1 does not identify Swindon as a Principal Settlement, it fails to be considered in all subsequent policies that refer to this category of settlement (i.e., Policy 2, etc).
- 5.13 It is an acknowledged fact that overall housing delivery at Swindon has not kept pace with that projected in the Local Plan 2026. This follows a pattern from the previous Local Plan and is why SCC (working in conjunction with other Business Support Organisations active in the area) gave evidence to the Swindon Local Plan Examination in May 2014 calling for an early review of the Swindon Local Plan 2026, to be carried out jointly in conjunction with Wiltshire, a point accepted and endorsed by the Inspector who recommended a Review be completed by 2016 (see para 2.3 above). Such review is, of course, now long overdue and the work fragmented rather than

conducted jointly and comprehensively over a short time scale rather than a strategic one.

- 5.14 Having due regard to the current 5-year Housing Land Supply of both Councils there is therefore a requirement to ensure short term delivery of housing land is provided while the larger strategic sites gather critical mass and deliver. SCC notes the key allocations in Swindon such as Kingsdown, New Eastern Villages and Wichelstowe have all experienced very significant delays and therefore is extremely concerned as to the actual contribution that these sites will make in the future, particularly in the short term.
- 5.15 Labour and skill shortages continue to be recorded on quarterly survey conducted by SCC in conjunction with both the wider Thames Valley CoC and the BCC and this remains of concern to SCC. An adequate supply of housing is critical to addressing this to continue to attract young, economically active people to move to Swindon to take advantage of the employment opportunities. Whilst it is acknowledged that Swindon Borough Council, through their Swindon Local Plan Review, may be seeking to allocate a number of small non-strategic sites, these may help the short term delivery but cannot, even collectively, replace or make up for continued under-delivery of the larger strategic sites which will be responsible for the majority of housing delivery over the Plan period. SCC believe in any event that the Plan period is too short and therefore does not provide the necessary strategic framework (with Wiltshire Local Plan Review) for infrastructure planning and delivery. (See SCC Local Policy Priorities 2023 at Appendix B).
- 5.16 Consequently, SCC remain of the view that a Joint Strategy for meeting housing, and employment and infrastructure needs in Swindon is still not only desirable but should form an integral element of the strategic planning of the two authorities concerned.
- 5.17 This particular point becomes even more significant when one considers the timescale of the Local Plan to 2038 (along with the very much delayed Swindon Local Plan Review, previously to 2036). In line with previous representations, SCC are of the view that this is a wholly inadequate timescale to deal with both Wiltshire and Swindon's housing and employment needs and therefore the two Local Plans, even in due course read together, will not provide an appropriate framework for economic and spatial planning let alone infrastructure planning and delivery. To underline this point, the Review process has resulted in two Council's producing two separate Local Plan Reviews concerning the Swindon Housing Market Area, both of which to date have ignored the fact that large areas of Swindon's already built-up area already lie within the Wiltshire Council's administrative area. It may be of note also that every one of these development areas (for both employment and housing) built within Wiltshire's administrative area has been as a result of appeal decisions by the Secretary of State, and not by way of positive, planned Development Plan allocations on the part of Wiltshire (or the former North Wiltshire District) Council.
- 5.18 It is disappointing that no update has been given as part of this Regulation 19 consultation with regards to the extent of any joint working between both Wiltshire and Swindon authorities concerning cross-boundary matters. It is understood that this is to be formalised through a 'Statement of Common Ground' (in place of a Joint Spatial Framework). It is acknowledged that the March 2020 Statement of Common Ground has been produced, however, this states that both Wiltshire Council and Swindon Borough Council "can meet its assessed housing need within its own administrative area" and are "making provision to meet their respective needs within their local plans". SCC suggests this does not form a cooperative strategy that contributes to 'sound' plan-making, with both Councils deferring issues with cross-boundary strategic matters. It is also of note that no updated Statements of Common Ground have been produced as part of further consultation material. SCC would therefore urge the Secretary of State to

instruct both Council's to provide a comprehensive and coordinated approach to strategic planning to a longer timescale (2060 has been suggested by SCC) which can properly address the issues of providing an appropriate framework for infrastructure planning, funding and delivery as well as providing a strategic framework for spatial planning. These comments are made in respect of both housing and employment provision.

- 5.19 In previous representations on the Local Plan Review, SCC set out their views to the effect that the historic evidence base, notably the significant evidence contained in the "Gold" and "Silver" Reports of 1966 and 1968 respectively, which looked at the concept of large scale expansion of Swindon, pointed to future westward expansion of the town; ***"...within the limits of these (landscape and topographic) restrictions lies an area regarded as suitable for the purpose of the expansion. It is the western sector..."*** [SCC added emphasis]. This potential was subsequently recognised by other strategic planning reviews, notably the South West Regional Strategy which, following Public Examination, contained a Panel recommendation for 4,000 homes in Wiltshire (on the western edge of Swindon) to help meet Swindon's identified housing need. SCC therefore considers that there is a very significant body of evidence to support the accommodation of strategic growth to the west and north-west of Swindon, both for housing and employment along with the related infrastructure. This would be wholly consistent with SCC's published Local Policy Priorities over many years, currently embodied in the 2023 update contained herewith at Appendix B.
- 5.20 The introduction of the Local Plan states that Spatial Strategy will focus on distribution of new homes and employment land at Wiltshire's Principal Settlements and market towns, but fails to identify Swindon, partly built within Wiltshire's administrative area, and the largest urban settlement in the geographical County of Wiltshire, as such. The Spatial Vision continues to fail to recognise Swindon as a Principal Settlement and consequently the key Policy 1 and all subsequent relevant Policies continue in the same vein.
- 5.21 The subsequent section on delivery notes that ***"the spatial strategy focuses on the different long-term roles of settlement and apports growth accordingly"***. Again, as per the observations discussed earlier in these representations, a Local Plan looking ahead just 13 years from potential adoption date (based on the Wiltshire Council July 2020 Local Development Scheme) is not sufficient to be considered a 'long-term' strategy and does not take into account the pressing cross-border issues at play which can be only addressed by a more comprehensive approach and recognition of the fact that development should be provided by way of development plan allocations at the most sustainable locations within the Swindon HMA, one of which must unquestionably be the Swindon urban fringe to the west and north west of the town.
- 5.22 In terms of development spatial strategy, SCC have consistently made the case for a longer term and more strategic approach to both economic and spatial planning, addressing the cross-border issues and calling for long term infrastructure planning to address communication and transportation issues. Once again, the SCC Local Policy Priorities 2023 document (Appendix B) points to what SCC consider to be the essential long term infrastructure elements that should be planned for, key components of which (in transport terms) would help to deliver urban regeneration in a key urban area (Thamesdown Drive extension and Cheney Manor respectively). Focussing development on Principal Settlements, if this included Swindon, would suggest the most suitable area to consider for the location of development in the Swindon HMA would be the unconstrained area to the west of Swindon. It can be also noted that Table 3.2 of the Local Plan does not identify Swindon as a constrained settlement. This would have the

benefit of opening up the opportunities for maximising the rail (both passenger and freight) potential on the Swindon- Gloucester/Cheltenham line, itself the recent beneficiary of re-twin-track improvement to provide capacity for improved and greater use. This in addition to supporting proposals for the timely delivery of Western Rail Link to London Heathrow that positions Swindon within the 'golden-hour' of the airport.

- 5.23 Positively planning for sustainable development to the west of Swindon would also allow for smaller scale development at other sustainable settlements such as Royal Wootton Bassett and Marlborough and take the pressure off such areas as a primary focus for development allowing them to plan only for essential local housing and employment needs. The supporting alternative strategies paper of 2021 acknowledged that there is a much higher proportion of land availability at west of Swindon, Marlborough (for local needs only) and the rest of the HMA compared to Wootton Bassett, concluding that ***“Significant fresh allocations would be needed at Royal Wotton Bassett that may be difficult to accommodate and complex to deliver. This suggests potential issues achieving delivery rates. On the other hand, supply elsewhere would appear to be much less problematic”***. Notwithstanding this statement in 2021, allocations have been made at Royal Wootton Bassett, including to the east of the town where encroachment into the former “Rural Buffer” gap with Swindon will even further increase the risk of coalescence between the two settlements.
- 5.24 In terms of climate change implications, the previous consultation paper stated that ***“if each authority plans to meet its own needs for new homes and employment, this goes some way to reduce the need to travel between the two authorities. Both authorities agree to this course of action”***. [Para 3.71]. SCC considered this a fundamentally flawed statement, particularly bearing in mind that a very substantial part of Swindon’s built-up form is already built within the Wiltshire administrative area. In terms of reducing the need to travel, locating new development to the west of Swindon would facilitate ease of access to existing public transport and community infrastructure and reduces the need to travel. This would fit more comfortably with the climate change and sustainability principles and policies of the plan. It would also therefore lend even greater weight for Swindon’s development needs, both employment as well as housing, to be strategically planned for on the edge of the existing urban area. This logic is absent from the Local Plan policies, derived mainly from Policy 1 failure to correctly identify Swindon as a Principal Settlement with the consequent knock-on effect to the rest of the Policies and spatial vision and proposals of the plan. The 2021 Emerging Strategies Consultation paper stated 5.28 that ***“In terms of existing transport infrastructure West of Swindon seems best served and preferable to Royal Wotton Bassett”*** and further warned that ***“...Growth in all the outer Swindon HMA, however, will need to consider the transport infrastructure to support relationships with Swindon”***. This conclusion seems to have been disregarded in the consequent draft Local Plan.
- 5.25 The Local Plan Review sets out how growth will be accommodated at Marlborough and Royal Wootton Bassett, including allocation of greenfield sites and sets out elsewhere that there may be scope for Neighbourhood Plans to allocate additional sites to meet requirements for their housing and employment needs. However, SCC are of the view that this (Neighbourhood Plan) provision should only be used to address very with localised and additional housing and employment needs. The Local Plan itself should address the more strategic requirements for both housing and employment rather than leave it to Neighbourhood Plans to assess the need for and identification of sites. This approach is more consistent with proposed updates to the NPPF. However, the employment and housing land supply situation in both Swindon and

Wiltshire is currently such that the matter needs to be addressed both strategically and expeditiously through the Local Plans, preferably by way of a joint review.

5.26 SCC do not therefore support the Spatial Strategy of the Plan as currently drafted and does not support the development strategy for the Swindon HMA. On the grounds that:-

- First, it fails to recognise and give due weight to the significance and role of Swindon as a Principal Settlement in a wider Wiltshire context and, as a result, does not address the long-term cross-boundary development opportunities which are needed to strengthen the established socio-economic relationship between the two adjoining authorities and its residents, and.
- Second, as a consequence of this failure to identify Swindon as a Principal Settlement, the rest of the Local Plan's policy framework is flawed (as it relates to the Swindon HMA), with policies relating to climate change, sustainability, transport, etc being equally compromised by the failure of Policy 1 to identify Swindon as a Principal Settlement. Inevitably, the locational strategy (of the Swindon HMA) is therefore also flawed. The strategy places too much emphasis on settlements of Marlborough and Royal Wootton Bassett without giving due recognition to the fact that Swindon is the main settlement in the geographical County and by far the most sustainable location to meet identified local needs arising from the Swindon HMA for both housing and employment is adjoining the urban area of Swindon.
- Most importantly, the Council's approach also fails to recognise the need for a longer term time horizon to plan strategically for funding and delivery of new infrastructure to support continued economic growth and prosperity, particularly at Swindon where new strategic infrastructure will be required for future long term expansion, and this cannot be planned for by an insular approach.
- It is for these reasons that SCC believe that the Regulation 19 Version of the Wiltshire Local Plan 2038 is unsound, will not be effective and does not meet the requirement under the Duty to Cooperate as far as the Plan deals with the issues concerning Swindon and the Swindon HMA.

5.27 SVCC has set out in summary form on a policy by policy basis their objections and concerns on the representation forms as requested and these are contained with this Overview at Appendix A.



Paul Britton
Chief Executive Officer
Thames Valley Chamber of Commerce & Industry Group

Appendix A:

Completed Representation Forms

Wiltshire Local Plan

Publication Stage Representation Form

Ref:

(For official use only)

Please return to Wiltshire Council, by 5pm on Wednesday 22nd November 2023.

By post to: Spatial Planning, Planning Directorate, Wiltshire Council, County Hall,
Bythesea Road, Trowbridge, Wiltshire, BA14 8JN.

By e-mail to: spatialplanningpolicy@wiltshire.gov.uk

For further information please visit: www.wiltshire.gov.uk/local-plan **or Tel:** 01225 713223

This form has two parts:

Part A – Personal details

Part B – Your representation(s). Please use a separate sheet for each representation.

Part A – Personal details

Please note the following:

- We cannot register your representation without your details.
- Representations cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.
- All information will be sent for examination by an independent inspector.
- All personal data will be handled in line with the Council's Privacy Policy on Spatial Planning matters. You can view the Spatial Planning privacy notice at <https://www.wiltshire.gov.uk/planning-privacy-notice>.

**if an agent is appointed, please fill in your Title, Name and Organisation but the full contact details of the agent must be completed.*

	1. Personal details	2. Agent's details (if applicable)*
Title	Mr	
First name	Paul	Tim
Last name	Britton	Major
Job title (where relevant)	Chief Executive	Swindon Client Manager
Organisation (where relevant)	Thames Valley Chamber of Commerce Group	Swindon Chamber of Commerce
Address Line 1	150 Edinburgh Ave	Old Bank House Business Centre
Address Line 2	Slough	5 Devizes Road
Address Line 3	Berkshire	Old Town
Address Line 4		Swindon
Postcode	SL1 4SS	SN1 4BJ
Telephone Number	c/o agent	01793 610222
Email Address	c/o agent	07768660697

Part B – Please use a separate sheet for each representation.

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.

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

Policy:	Paragraph: 1.9 – 1.20	Table:	Figure:
Topic: Introduction and Spatial Portrait		Other:	

4. Do you consider the Wiltshire Local Plan is:

(i) Legally compliant	Yes:	X	No:	
(ii) Sound	Yes:		No:	X
(iii) Complies with the duty to co-operate	Yes:		No:	X
<i>Please indicate with an 'X' as appropriate</i>				

4b. If you think the Wiltshire Local Plan is not sound, please indicate the reason(s) why:

(1) Not positively prepared	X
(2) Not justified	X
(3) Not effective	X
(4) Not consistent with national policy	X
<i>Please indicate with an 'X' as appropriate</i>	

See separate statement of representation procedure (guidance note) for further information on 'soundness'.

5. Please give details of why you consider the Wiltshire 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 Wiltshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please also see written overview submission on behalf of Swindon Chamber of Commerce.

The time frame of the Local Plan is too short and fails to meet NPPF advice. The short time scale is wholly inadequate for planning and financing of major infrastructure by agencies beyond Wiltshire Council.

Whilst para 1.13 acknowledges that Swindon has expanded into Wiltshire, it fails to acknowledge the significance of this in planning policy terms. Consequently, Swindon is not designated as a

Principal Settlement in para 1.17 or in any following Policies contained in the Local Plan, notably Policy 1.

This is, in our view, a fundamental flaw in the logic of the strategy and makes the whole Local Plan unsound. In particular, since many subsequent policies of the plan rely fundamentally on the definition of “Principal Settlements” for their location emphasis this the Local Plan ineffective, particularly for the Swindon Housing Market Area locational strategy and policies.

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

5a. If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal (SA), please make them here.

See Above

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

6. Please set out the modification(s) you consider necessary to make the Wiltshire 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 Wiltshire 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.

The Local Plan should be changed to accurately reflect Swindon’s function as a Principal Settlement within Wiltshire with consequential changes throughout the document and other Policies.

Please also see written Overview submission on behalf of Swindon Chamber of Commerce

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

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

We believe that Swindon Chamber of Commerce, as the accredited British Chamber of Commerce for Swindon, is in a unique position to present the views of the local business community as represented through its membership. Swindon Chamber of Commerce is also part of the wider Thames Valley Chamber of Commerce Group representing businesses throughout the M4/M40 corridors from west London to Wiltshire.

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


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.

9. Do you wish to be notified of any of the following?

Please tick all that apply.

The submission of the Wiltshire Local Plan Review for Independent Examination	✓
The publication of the report of the Inspector appointed to carry out the examination	✓
The adoption of the Local Plan Review	✓

Please ensure that we have either an up-to-date email address or postal address at which we can contact you.

Signature:		Date:	22nd November 2023
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Part B – Please use a separate sheet for each representation.

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.

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

Policy:	Paragraph: 2.1 and 2.9–2.11 and 2.16-2.21	Table:	Figure:
Topic: Spatial Vision		Other:	

4. Do you consider the Wiltshire Local Plan is:

(i) Legally compliant	Yes:		No:	X
(ii) Sound	Yes:		No:	X
(iii) Complies with the duty to co-operate	Yes:		No:	X
<i>Please indicate with an 'X' as appropriate</i>				

4b. If you think the Wiltshire Local Plan is not sound, please indicate the reason(s) why:

(1) Not positively prepared	X
(2) Not justified	X
(3) Not effective	X
(4) Not consistent with national policy	X
<i>Please indicate with an 'X' as appropriate</i>	

See separate statement of representation procedure (guidance note) for further information on 'soundness'.

5. Please give details of why you consider the Wiltshire 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 Wiltshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see written Overview representation submission on behalf of Swindon Chamber of Commerce.

The failure to identify Swindon as a Principal Settlement in both the Spatial Vision and Policy 1 (and subsequent related policies in the document) means the Plan is not positively prepared, not consistent with national policy and unsound.

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

5a. If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal (SA), please make them here.

Please see written Overview representation submission on behalf of Swindon Chamber of Commerce.

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

6. Please set out the modification(s) you consider necessary to make the Wiltshire 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 Wiltshire 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.

Please see written Overview representation submission on behalf of Swindon Chamber of Commerce

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

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

<input type="checkbox"/>	No , I do not wish to participate in hearing session(s)	<input checked="" type="checkbox"/> Yes	Yes , I wish to participate in hearing session(s)
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8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

We believe that Swindon Chamber of Commerce as the accredited British Chamber of Commerce for Swindon is in a unique position to present the views of the local business community as representing through its membership. Swindon Chamber of Commerce is also part of the wider Thames Valley Chamber of Commerce Group representing businesses throughout the M4/M40 corridors from west London to Wiltshire.

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


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9. Do you wish to be notified of any of the following?

Please tick all that apply.

The submission of the Wiltshire Local Plan Review for Independent Examination	<input checked="" type="checkbox"/>
The publication of the report of the Inspector appointed to carry out the examination	<input checked="" type="checkbox"/>
The adoption of the Local Plan Review	<input checked="" type="checkbox"/>

Please ensure that we have either an up-to-date email address or postal address at which we can contact you.

Signature:		Date:	22nd November 2023
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Part B – Please use a separate sheet for each representation.

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.

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

Policy: 1	Paragraph: 3.1–3.27	Table:	Figure: 3.1 Key Diagram
Topic: Spatial Strategy for Wiltshire		Other:	

4. Do you consider the Wiltshire Local Plan is:

(i) Legally compliant	Yes:	X	No:	
(ii) Sound	Yes:		No:	X
(iii) Complies with the duty to co-operate	Yes:		No:	X
<i>Please indicate with an 'X' as appropriate</i>				

4b. If you think the Wiltshire Local Plan is not sound, please indicate the reason(s) why:

(1) Not positively prepared	X
(2) Not justified	X
(3) Not effective	X
(4) Not consistent with national policy	X
<i>Please indicate with an 'X' as appropriate</i>	

See separate statement of representation procedure (guidance note) for further information on 'soundness'.

5. Please give details of why you consider the Wiltshire 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 Wiltshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see written Overview submission on behalf of Swindon Chamber of Commerce

The failure to identify Swindon as a Principal Settlement in both the Spatial Vision and Policy 1 (and subsequent related policies in the document) means the Plan is not positively prepared, not consistent with national policy and unsound.

SCC notes that Table 3.1 acknowledges that Swindon is not a constrained settlement, and questions why this is ignored when selecting broad locations for growth.

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

5a. If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal (SA), please make them here.

Please see written Overview representation submission on behalf of Swindon Chamber of Commerce

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

6. Please set out the modification(s) you consider necessary to make the Wiltshire 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 Wiltshire 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.

Please see written Overview representation submission on behalf of Swindon Chamber of Commerce.

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

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 X	Yes , I wish to participate in hearing session(s)
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(Continue on a separate sheet/ expand box if necessary)

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9. Do you wish to be notified of any of the following?

Please tick all that apply.

The submission of the Wiltshire Local Plan Review for Independent Examination	<input checked="" type="checkbox"/>
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The publication of the report of the Inspector appointed to carry out the examination	✓
The adoption of the Local Plan Review	✓

Please ensure that we have either an up-to-date email address or postal address at which we can contact you.

Signature:		Date:	22nd November 2023
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Part B – Please use a separate sheet for each representation.

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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.

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

Policy: 2	Paragraph: 3.28 and 3.52 and 3.54	Table: 3.1 and 3.2	Figure:
Topic: Delivery Strategy		Other:	

4. Do you consider the Wiltshire Local Plan is:

(i) Legally compliant	Yes:	X	No:	
(ii) Sound	Yes:		No:	X
(iii) Complies with the duty to co-operate	Yes:		No:	X
<i>Please indicate with an 'X' as appropriate</i>				

4b. If you think the Wiltshire Local Plan is not sound, please indicate the reason(s) why:

(1) Not positively prepared	X
(2) Not justified	X
(3) Not effective	X
(4) Not consistent with national policy	X
<i>Please indicate with an 'X' as appropriate</i>	

See separate statement of representation procedure (guidance note) for further information on 'soundness'.

5. Please give details of why you consider the Wiltshire 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 Wiltshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see written Overview representation submission on behalf of Swindon Chamber of Commerce.

The failure to identify Swindon as a Principal Settlement in both the Spatial Vision and Policy 1 (and subsequent related policies in the document) means that the Plan is not positively prepared, not consistent with national policy and not sound. SCC are conscious of the need to ensure that in a Functional Economic Area/Housing Market Area such as Swindon that the balance between

people, homes and jobs is achieved to ensure the maintenance of economic growth and prosperity. SCC has chosen not to enter into the detailed debate as to appropriate level of housing in either Wiltshire or specifically the Swindon HMA but, rather, to focus on the effectiveness of the spatial strategy and the delivery framework policies.

Housing delivery in recent years in both northeastern Wiltshire and Swindon Borough has been below what might reasonably have been expected from Local Plan policy frameworks and 5-year Housing Land Supply has also been very low in Swindon (2.9 years) and marginal at best in Wiltshire, evidenced by numerous appeal decisions over several years. It is incumbent therefore on both authorities to ensure in moving forward that the Development Plan Framework provides for an adequate level of new homes to provide an economically active workforce that keeps pace with job growth at Swindon.

It is not possible, unfortunately, to achieve a composite view of the future housing provision levels at this time as Swindon BC have yet to publish a new Regulation 18 version of their Local Plan Review, but if this emerges, as seems likely, predicated on SBC meeting housing needs from only within Swindon Borough then the recent problems of low housing delivery are likely to be perpetuated and, with no contribution coming from Wiltshire, there is likely to be an inevitable impact on the Swindon economy and a continuation of labour and skill shortages in the local employment market.

The Overview representation submission by SCC gives further information in respect of both the local economy and the local housing delivery problems experienced in Swindon.

SCC notes that Table 3.1 acknowledges that Swindon is not a constrained settlement, and questions why this is not taken into account when selecting broad locations for growth.

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

5a. If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal (SA), please make them here.

Please see written Overview representation submission on behalf of Swindon Chamber of Commerce.

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

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Please see written Overview representation submission on behalf of Swindon Chamber of Commerce.

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

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 X	Yes , I wish to participate in hearing session(s)
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The publication of the report of the Inspector appointed to carry out the examination	✓
The adoption of the Local Plan Review	✓

Please ensure that we have either an up-to-date email address or postal address at which we can contact you.

Signature:		Date:	22nd November 2023
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Part B – Please use a separate sheet for each representation.

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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.

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

Policy: 2	Paragraph: 3.1 to 3.56	Table:3.1 and 3.2	Figure:
Topic: Broad Locations for Growth		Other: Key Diagram	

4. Do you consider the Wiltshire Local Plan is:

(i) Legally compliant	Yes:	X	No:	
(ii) Sound	Yes:		No:	X
(iii) Complies with the duty to co-operate	Yes:		No:	X
<i>Please indicate with an 'X' as appropriate</i>				

4b. If you think the Wiltshire Local Plan is not sound, please indicate the reason(s) why:

(1) Not positively prepared	X
(2) Not justified	X
(3) Not effective	X
(4) Not consistent with national policy	X
<i>Please indicate with an 'X' as appropriate</i>	

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housing in either Wiltshire or specifically the Swindon HMA but, rather, to focus on the effectiveness of the spatial strategy and the delivery framework policies.

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It is not possible, unfortunately, to achieve a composite view of the future housing provision levels at this time as Swindon BC have yet to publish a new Regulation 18 version of their Local Plan Review, but if this emerges, as seems likely, predicated on SBC meeting housing needs from only within Swindon Borough then the recent problems of low housing delivery are likely to be perpetuated and, with no contribution coming from Wiltshire, there is likely to be an inevitable impact on the Swindon economy and a continuation of labour and skill shortages in the local employment market.

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

5a. If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal (SA), please make them here.

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

6. Please set out the modification(s) you consider necessary to make the Wiltshire 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 Wiltshire 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.

Please see written Overview representation submission on behalf of Swindon Chamber of Commerce.

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

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


<p>We believe that Swindon Chamber of Commerce as the accredited British Chamber of Commerce for Swindon is in a unique position to present the views of the local business community as representing through its membership. Swindon Chamber of Commerce is also part of the wider Thames Valley Chamber of Commerce Group representing businesses throughout the M4/M40 corridors from west London to Wiltshire.</p> <p style="text-align: right;"><i>(Continue on a separate sheet/ expand box if necessary)</i></p> <p><i>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.</i></p>
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9. Do you wish to be notified of any of the following?

Please tick all that apply.

The submission of the Wiltshire Local Plan Review for Independent Examination	✓
The publication of the report of the Inspector appointed to carry out the examination	✓
The adoption of the Local Plan Review	✓

Please ensure that we have either an up-to-date email address or postal address at which we can contact you.

Signature:		Date:	22nd November 2023
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Part B – Please use a separate sheet for each representation.

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.

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

Policy: 4	Paragraph:	Table:	Figure:
Topic: Addressing Climate Change		Other:	

4. Do you consider the Wiltshire Local Plan is:

(i) Legally compliant	Yes:	x	No:	
(ii) Sound	Yes:	x	No:	
(iii) Complies with the duty to co-operate	Yes:	x	No:	
<i>Please indicate with an 'X' as appropriate</i>				

4b. If you think the Wiltshire Local Plan is not sound, please indicate the reason(s) why:

(1) Not positively prepared	
(2) Not justified	
(3) Not effective	
(4) Not consistent with national policy	
<i>Please indicate with an 'X' as appropriate</i>	

See separate statement of representation procedure (guidance note) for further information on 'soundness'.

5. Please give details of why you consider the Wiltshire 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 Wiltshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see written Overview representation submission on behalf of Swindon Chamber of Commerce.

SCC Supports this policy. However, SCC is of the view that the failure to identify Swindon as a Principal Settlement compromises the potential soundness and effectiveness of the policy.

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

5a. If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal (SA), please make them here.

Please see written Overview representation submission on behalf of Swindon Chamber of Commerce.

SCC Supports this policy. However, SCC is of the view that the failure to identify Swindon as a Principal Settlement compromises the potential soundness and effectiveness of the policy.

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

6. Please set out the modification(s) you consider necessary to make the Wiltshire 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 Wiltshire 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.

Please see written Overview representation submission on behalf of Swindon Chamber of Commerce.

SCC Supports this policy. However, SCC is of the view that the failure to identify Swindon as a Principal Settlement compromises the potential soundness and effectiveness of the policy.

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

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

<input type="checkbox"/>	No , I do not wish to participate in hearing session(s)	<input checked="" type="checkbox"/>	Yes , I wish to participate in hearing session(s)
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8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

We believe that Swindon Chamber of Commerce as the accredited British Chamber of Commerce for Swindon is in a unique position to present the views of the local business community as representing through its membership. Swindon Chamber of Commerce is also part of the wider Thames Valley Chamber of Commerce Group representing businesses throughout the M4/M40 corridors from west London to Wiltshire.

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


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9. Do you wish to be notified of any of the following?

Please tick all that apply.

The submission of the Wiltshire Local Plan Review for Independent Examination	✓
The publication of the report of the Inspector appointed to carry out the examination	✓
The adoption of the Local Plan Review	✓

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Signature:		Date:	22nd November 2023
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Part B – Please use a separate sheet for each representation.

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.

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

Policy: 5	Paragraph: 3.63–3.73	Table:	Figure:
Topic: Infrastructure Delivery		Other:	

4. Do you consider the Wiltshire Local Plan is:

(i) Legally compliant	Yes:	X	No:	
(ii) Sound	Yes:		No:	X
(iii) Complies with the duty to co-operate	Yes:		No:	X
<i>Please indicate with an 'X' as appropriate</i>				

4b. If you think the Wiltshire Local Plan is not sound, please indicate the reason(s) why:

(1) Not positively prepared	
(2) Not justified	
(3) Not effective	X
(4) Not consistent with national policy	
<i>Please indicate with an 'X' as appropriate</i>	

See separate statement of representation procedure (guidance note) for further information on 'soundness'.

5. Please give details of why you consider the Wiltshire 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 Wiltshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see written Overview representation submission on behalf of Swindon Chamber of Commerce.

SCC Supports this policy. However, SCC is of the view that the failure to identify Swindon as a Principal Settlement compromises the potential soundness and effectiveness of the policy.

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

5a. If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal (SA), please make them here.

Please see written Overview representation submission on behalf of Swindon Chamber of Commerce.

SCC Supports this policy. However, SCC is of the view that the failure to identify Swindon as a Principal Settlements compromises the potential soundness and effectiveness of the policy.

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

6. Please set out the modification(s) you consider necessary to make the Wiltshire 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 Wiltshire 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.

Please see written overview submission on behalf of Swindon Chamber of Commerce

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

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

We believe that Swindon Chamber of Commerce as the accredited British Chamber of Commerce for Swindon is in a unique position to present the views of the local business community as representing through its membership. Swindon Chamber of Commerce is also part of the wider Thames Valley Chamber of Commerce Group representing businesses throughout the M4/M40 corridors from west London to Wiltshire.

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


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.

9. Do you wish to be notified of any of the following?

Please tick all that apply.

The submission of the Wiltshire Local Plan Review for Independent Examination	✓
The publication of the report of the Inspector appointed to carry out the examination	✓
The adoption of the Local Plan Review	✓

Please ensure that we have either an up-to-date email address or postal address at which we can contact you.

Signature:		Date:	22nd November 2023
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Part B – Please use a separate sheet for each representation.

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.

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

Policy:	Paragraph: 4.1-4.18	Table:	Figure:
Topic: Area Strategies		Other:	

4. Do you consider the Wiltshire Local Plan is:

(i) Legally compliant	Yes:	X	No:	
(ii) Sound	Yes:		No:	X
(iii) Complies with the duty to co-operate	Yes:		No:	X
<i>Please indicate with an 'X' as appropriate</i>				

4b. If you think the Wiltshire Local Plan is not sound, please indicate the reason(s) why:

(1) Not positively prepared	X
(2) Not justified	X
(3) Not effective	X
(4) Not consistent with national policy	X
<i>Please indicate with an 'X' as appropriate</i>	

See separate statement of representation procedure (guidance note) for further information on 'soundness'.

5. Please give details of why you consider the Wiltshire 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 Wiltshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see written Overview representation submission on behalf of Swindon Chamber of Commerce.

SCC is of the view that the failure to identify Swindon as a Principal Settlement compromises the potential soundness and effectiveness of the policy.

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

5a. If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal (SA), please make them here.

Please see written Overview representation submission on behalf of Swindon Chamber of Commerce.

SCC is of the view that the failure to identify Swindon as a Principal Settlement compromises the potential soundness and effectiveness of the policy.

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

6. Please set out the modification(s) you consider necessary to make the Wiltshire 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 Wiltshire 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.

Please see written Overview representation submission on behalf of Swindon Chamber of Commerce.

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

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

We believe that Swindon Chamber of Commerce as the accredited British Chamber of Commerce for Swindon is in a unique position to present the views of the local business community as representing through its membership. Swindon Chamber of Commerce is also part of the wider Thames Valley Chamber of Commerce Group representing businesses throughout the M4/M40 corridors from west London to Wiltshire.

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


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.

9. Do you wish to be notified of any of the following?

Please tick all that apply.

The submission of the Wiltshire Local Plan Review for Independent Examination	✓
The publication of the report of the Inspector appointed to carry out the examination	✓
The adoption of the Local Plan Review	✓

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Signature:		Date:	22nd November 2023
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Part B – Please use a separate sheet for each representation.

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.

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

Policy: 44 to 51	Paragraph: 4.218-4.222 and 4.263-4.271	Table: 4.10, 4.11, 4.12 and 4.13	Figure:
Topic: Strategy for the Swindon Market Area		Other:	

4. Do you consider the Wiltshire Local Plan is:

(i) Legally compliant	Yes:	X	No:	
(ii) Sound	Yes:		No:	X
(iii) Complies with the duty to co-operate	Yes:		No:	X
<i>Please indicate with an 'X' as appropriate</i>				

4b. If you think the Wiltshire Local Plan is not sound, please indicate the reason(s) why:

(1) Not positively prepared	X
(2) Not justified	X
(3) Not effective	X
(4) Not consistent with national policy	X
<i>Please indicate with an 'X' as appropriate</i>	

See separate statement of representation procedure (guidance note) for further information on 'soundness'.

5. Please give details of why you consider the Wiltshire 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 Wiltshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see written Overview representation submission on behalf of Swindon Chamber of Commerce.

SCC is of the view that the failure to identify Swindon as a Principal Settlement compromises the potential soundness and effectiveness of the policy. Consequently, whilst SCC does not object to the policies *per se*, Policies 44 to 51 do not take advantage of the locational benefit of development more closely associated with Swindon existing built up area.

Furthermore, failure to identify Swindon as a Principal Settlement treats that part of the town built within Wiltshire's administrative area as a rural area which totally ignores the sustainability credentials of potential development sites in this area. Swindon (particularly that part of the area built within Wiltshire's administrative area) is not identified even as a "Local Service Centre" a large or small village – it is treated as if it were a "Rural Area". This approach seriously compromises other policies elsewhere in the plan related to topics such as climate change, sustainable travel, employment etc.

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

5a. If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal (SA), please make them here.

Please see written Overview representation submission on behalf of Swindon Chamber of Commerce.

SCC is of the view that the failure to identify Swindon as a Principal Settlements compromises the potential soundness and effectiveness of the policy.

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

6. Please set out the modification(s) you consider necessary to make the Wiltshire 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 Wiltshire 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.

Please see written Overview representation submission on behalf of Swindon Chamber of Commerce

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

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

We believe that Swindon Chamber of Commerce as the accredited British Chamber of Commerce for Swindon is in a unique position to present the views of the local business community as representing through its membership. Swindon Chamber of Commerce is also part of the wider Thames Valley Chamber of Commerce Group representing businesses throughout the M4/M40 corridors from west London to Wiltshire.

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


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9. Do you wish to be notified of any of the following?

Please tick all that apply.

The submission of the Wiltshire Local Plan Review for Independent Examination	✓
The publication of the report of the Inspector appointed to carry out the examination	✓
The adoption of the Local Plan Review	✓

Please ensure that we have either an up-to-date email address or postal address at which we can contact you.

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Part B – Please use a separate sheet for each representation.

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.

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

Policy: 64	Paragraph: 5.1-5.11	Table:	Figure:
Topic: Employment Land		Other:	

4. Do you consider the Wiltshire Local Plan is:

(i) Legally compliant	Yes:	X	No:	
(ii) Sound	Yes:		No:	X
(iii) Complies with the duty to co-operate	Yes:		No:	X
<i>Please indicate with an 'X' as appropriate</i>				

4b. If you think the Wiltshire Local Plan is not sound, please indicate the reason(s) why:

(1) Not positively prepared	X
(2) Not justified	X
(3) Not effective	X
(4) Not consistent with national policy	X
<i>Please indicate with an 'X' as appropriate</i>	

See separate statement of representation procedure (guidance note) for further information on 'soundness'.

5. Please give details of why you consider the Wiltshire 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 Wiltshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see written overview submission on behalf of Swindon Chamber of Commerce

Policy 64 makes the specific provision for new proposals for employment development will be supported on unallocated sites within or adjacent to Principal Settlements. By failing to identify Swindon in Policy 1 as a principal Settlement this effectively rules out the prospect of any additional employment land being delivered at west Swindon, even though there are substantial employment areas in this general location.

The policy also fails to plan positively for additional employment needs arising from existing employers and the supporting text to the policy relies heavily on being within a town with meet

their future needs as they will not be classified as “Principal Settlement” status. It would be difficult even for existing employers to meet their future needs in West Swindon as they would, under this Policy framework, not be in a designated “Principal Employment Area” (para 5.9).

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

5a. If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal (SA), please make them here.

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

6. Please set out the modification(s) you consider necessary to make the Wiltshire 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 Wiltshire 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.

Please see written Overview representation submission on behalf of Swindon Chamber of Commerce

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

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

We believe that Swindon Chamber of Commerce as the accredited British Chamber of Commerce for Swindon is in a unique position to present the views of the local business community as representing through its membership. Swindon Chamber of Commerce is also part of the wider Thames Valley Chamber of Commerce Group representing businesses throughout the M4/M40 corridors from west London to Wiltshire.

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


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.

9. Do you wish to be notified of any of the following?

Please tick all that apply.

The submission of the Wiltshire Local Plan Review for Independent Examination	✓
The publication of the report of the Inspector appointed to carry out the examination	✓
The adoption of the Local Plan Review	✓

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Signature:		Date:	22nd November 2023
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Part B – Please use a separate sheet for each representation.

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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.

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

Policy: 65	Paragraph: 5.1-5.11	Table:	Figure:
Topic: Employment Land		Other:	

4. Do you consider the Wiltshire Local Plan is:

(i) Legally compliant	Yes:	X	No:	
(ii) Sound	Yes:		No:	X
(iii) Complies with the duty to co-operate	Yes:		No:	X
<i>Please indicate with an 'X' as appropriate</i>				

4b. If you think the Wiltshire Local Plan is not sound, please indicate the reason(s) why:

(1) Not positively prepared	X
(2) Not justified	X
(3) Not effective	X
(4) Not consistent with national policy	X
<i>Please indicate with an 'X' as appropriate</i>	

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5. Please give details of why you consider the Wiltshire 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 Wiltshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see written overview submission on behalf of Swindon Chamber of Commerce.

The policy only applies to Principal Employment Areas (which by their definition elsewhere means at Principal Settlements) The policy fails to plan positively for additional employment needs arising from existing employers and the supporting text to the policy relies heavily on being within a town with meet their future needs as they will not be classified as "Principal Settlement" status. It would be difficult even for existing employers to meet their future needs in

West Swindon as they would, under this Policy framework, not be in a designated (para 5.9). “Principal Employment Area”. No area at West Swindon is designated as a Principal Employment Area.

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

5a. If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal (SA), please make them here.

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

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Please see written Overview representation submission on behalf of Swindon Chamber of Commerce.

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

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)	X	Yes , I wish to participate in hearing session(s)
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We believe that Swindon Chamber of Commerce as the accredited British Chamber of Commerce for Swindon is in a unique position to present the views of the local business community as representing through its membership. Swindon Chamber of Commerce is also part of the wider Thames Valley Chamber of Commerce Group representing businesses throughout the M4/M40 corridors from west London to Wiltshire.

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


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Please tick all that apply.

The submission of the Wiltshire Local Plan Review for Independent Examination	✓
The publication of the report of the Inspector appointed to carry out the examination	✓
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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.

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

Policy: 69	Paragraph: 5.28-5.32	Table:	Figure:
Topic: Tourism		Other:	

4. Do you consider the Wiltshire Local Plan is:

(i) Legally compliant	Yes:	X	No:	
(ii) Sound	Yes:		No:	X
(iii) Complies with the duty to co-operate	Yes:		No:	X
<i>Please indicate with an 'X' as appropriate</i>				

4b. If you think the Wiltshire Local Plan is not sound, please indicate the reason(s) why:

(1) Not positively prepared	X
(2) Not justified	X
(3) Not effective	X
(4) Not consistent with national policy	X
<i>Please indicate with an 'X' as appropriate</i>	

See separate statement of representation procedure (guidance note) for further information on 'soundness'.

5. Please give details of why you consider the Wiltshire 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 Wiltshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see written Overview representation submission on behalf of Swindon Chamber of Commerce.

Whilst SCC basically supports the positive encouragement given to tourism by this policy the failure to identify Swindon as a Principal Settlement weakens the potential effectiveness of the policy to that part of Swindon within Wiltshire's administrative area.

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

5a. If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal (SA), please make them here.

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

6. Please set out the modification(s) you consider necessary to make the Wiltshire 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 Wiltshire 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.

Please see written Overview representation submission on behalf of Swindon Chamber of Commerce

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

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

We believe that Swindon Chamber of Commerce as the accredited British Chamber of Commerce for Swindon is in a unique position to present the views of the local business community as representing through its membership. Swindon Chamber of Commerce is also part of the wider Thames Valley Chamber of Commerce Group representing businesses throughout the M4/M40 corridors from west London to Wiltshire.

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


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.

9. Do you wish to be notified of any of the following?

Please tick all that apply.

The submission of the Wiltshire Local Plan Review for Independent Examination	✓
The publication of the report of the Inspector appointed to carry out the examination	✓
The adoption of the Local Plan Review	✓

Please ensure that we have either an up-to-date email address or postal address at which we can contact you.

Signature:		Date:	22nd November 2023
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Part B – Please use a separate sheet for each representation.

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.

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

Policy: 70	Paragraph: 5.33-5.34	Table:	Figure:
Topic: Sustainable Transport		Other:	

4. Do you consider the Wiltshire Local Plan is:

(i) Legally compliant	Yes:	X	No:	
(ii) Sound	Yes:		No:	X
(iii) Complies with the duty to co-operate	Yes:		No:	X
<i>Please indicate with an 'X' as appropriate</i>				

4b. If you think the Wiltshire Local Plan is not sound, please indicate the reason(s) why:

(1) Not positively prepared	X
(2) Not justified	X
(3) Not effective	X
(4) Not consistent with national policy	X
<i>Please indicate with an 'X' as appropriate</i>	

See separate statement of representation procedure (guidance note) for further information on 'soundness'.

5. Please give details of why you consider the Wiltshire 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 Wiltshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see written Overview representation submission on behalf of Swindon Chamber of Commerce

Whilst SCC basically supports the positive encouragement given to sustainable transport by this policy however the failure to identify Swindon as a Principal Settlement weakens the potential effectiveness of the policy to that part of Swindon within Wiltshire's administrative area (and the Swindon HMA). This is particularly the case as it subsequently relates to the development strategy and infrastructure delivery, with further knock-on implications for policies dealing with climate change etc.

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

5a. If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal (SA), please make them here.

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

6. Please set out the modification(s) you consider necessary to make the Wiltshire 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 Wiltshire 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.

Please see written Overview representation submission on behalf of Swindon Chamber of Commerce

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

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

We believe that Swindon Chamber of Commerce as the accredited British Chamber of Commerce for Swindon is in a unique position to present the views of the local business community as representing through its membership. Swindon Chamber of Commerce is also part of the wider Thames Valley Chamber of Commerce Group representing businesses throughout the M4/M40 corridors from west London to Wiltshire.

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


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9. Do you wish to be notified of any of the following?

Please tick all that apply.

The submission of the Wiltshire Local Plan Review for Independent Examination	✓
The publication of the report of the Inspector appointed to carry out the examination	✓
The adoption of the Local Plan Review	✓

Please ensure that we have either an up-to-date email address or postal address at which we can contact you.

Signature:		Date:	22nd November 2023
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Part B – Please use a separate sheet for each representation.

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.

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

Policy: 71	Paragraph: 5.35-5.41	Table:	Figure:
Topic: Transport & New Development		Other:	

4. Do you consider the Wiltshire Local Plan is:

(i) Legally compliant	Yes:	X	No:	
(ii) Sound	Yes:		No:	X
(iii) Complies with the duty to co-operate	Yes:		No:	X
<i>Please indicate with an 'X' as appropriate</i>				

4b. If you think the Wiltshire Local Plan is not sound, please indicate the reason(s) why:

(1) Not positively prepared	X
(2) Not justified	X
(3) Not effective	X
(4) Not consistent with national policy	X
<i>Please indicate with an 'X' as appropriate</i>	

See separate statement of representation procedure (guidance note) for further information on 'soundness'.

5. Please give details of why you consider the Wiltshire 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 Wiltshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see written overview submission on behalf of Swindon Chamber of Commerce

Whilst SCC basically supports the positive encouragement given to sustainable transport by this policy the failure to identify Swindon as a Principal Settlement weakens the potential effectiveness of the policy to that part of Swindon within Wiltshire's administrative area. This is particularly the case as it subsequently relates to the development strategy and infrastructure delivery, with further knock-on implications for policies dealing with climate change etc.

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

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Please see written Overview representation submission on behalf of Swindon Chamber of Commerce.

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

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 X	Yes , I wish to participate in hearing session(s)
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We believe that Swindon Chamber of Commerce as the accredited British Chamber of Commerce for Swindon is in a unique position to present the views of the local business community as representing through its membership. Swindon Chamber of Commerce is also part of the wider Thames Valley Chamber of Commerce Group representing businesses throughout the M4/M40 corridors from west London to Wiltshire.

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9. Do you wish to be notified of any of the following?

Please tick all that apply.

The submission of the Wiltshire Local Plan Review for Independent Examination	✓
The publication of the report of the Inspector appointed to carry out the examination	✓
The adoption of the Local Plan Review	✓

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Signature:		Date:	22nd November 2023
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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.

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

Policy: 73, 74 and 75	Paragraph: 5.45-5.53	Table:	Figure:
Topic: Transport: Demand management, Movement of Goods and Strategic transport network		Other:	

4. Do you consider the Wiltshire Local Plan is:

(i) Legally compliant	Yes:	X	No:	
(ii) Sound	Yes:		No:	X
(iii) Complies with the duty to co-operate	Yes:		No:	X
<i>Please indicate with an 'X' as appropriate</i>				

4b. If you think the Wiltshire Local Plan is not sound, please indicate the reason(s) why:

(1) Not positively prepared	X
(2) Not justified	X
(3) Not effective	X
(4) Not consistent with national policy	X
<i>Please indicate with an 'X' as appropriate</i>	

See separate statement of representation procedure (guidance note) for further information on 'soundness'.

5. Please give details of why you consider the Wiltshire 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 Wiltshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see written Overview representation submission on behalf of Swindon Chamber of Commerce.

The failure to identify Swindon as a Principal Settlement and identify a locational development strategy based on the opportunities that this would afford means that all transport policies are effectively compromised to a degree because of the inability of the Local Plan to fully exploit sustainable travel options. For example, the recently re-twin-tracked Swindon to Cheltenham/Gloucester rail line has substantial capacity that could be utilised by a West Swindon allocation to meet housing and employment needs.

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

5a. If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal (SA), please make them here.

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

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Please see written Overview representation submission on behalf of Swindon Chamber of Commerce

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

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 X	Yes , I wish to participate in hearing session(s)
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9. Do you wish to be notified of any of the following?

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The submission of the Wiltshire Local Plan Review for Independent Examination	✓
The publication of the report of the Inspector appointed to carry out the examination	✓
The adoption of the Local Plan Review	✓

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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.

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

Policy: 76	Paragraph: 5.54-5.61	Table:	Figure:
Topic: Affordable Homes		Other:	

4. Do you consider the Wiltshire Local Plan is:

(i) Legally compliant	Yes:	X	No:	
(ii) Sound	Yes:		No:	X
(iii) Complies with the duty to co-operate	Yes:		No:	X
<i>Please indicate with an 'X' as appropriate</i>				

4b. If you think the Wiltshire Local Plan is not sound, please indicate the reason(s) why:

(1) Not positively prepared	X
(2) Not justified	X
(3) Not effective	X
(4) Not consistent with national policy	X
<i>Please indicate with an 'X' as appropriate</i>	

See separate statement of representation procedure (guidance note) for further information on 'soundness'.

5. Please give details of why you consider the Wiltshire 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 Wiltshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see written Overview representation submission on behalf of Swindon Chamber of Commerce

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

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Please see written Overview representation submission on behalf of Swindon Chamber of Commerce

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

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)	X	Yes , I wish to participate in hearing session(s)
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(Continue on a separate sheet/ expand box if necessary)


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Please tick all that apply.

The submission of the Wiltshire Local Plan Review for Independent Examination	✓
The publication of the report of the Inspector appointed to carry out the examination	✓
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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.

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

Policy: 78	Paragraph: 5.66-5.75	Table:	Figure:
Topic: Meeting Wiltshire's Housing Needs		Other:	

4. Do you consider the Wiltshire Local Plan is:

(i) Legally compliant	Yes:	X	No:	
(ii) Sound	Yes:		No:	X
(iii) Complies with the duty to co-operate	Yes:		No:	X
<i>Please indicate with an 'X' as appropriate</i>				

4b. If you think the Wiltshire Local Plan is not sound, please indicate the reason(s) why:

(1) Not positively prepared	X
(2) Not justified	X
(3) Not effective	X
(4) Not consistent with national policy	X
<i>Please indicate with an 'X' as appropriate</i>	

See separate statement of representation procedure (guidance note) for further information on 'soundness'.

5. Please give details of why you consider the Wiltshire 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 Wiltshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see written Overview representation submission on behalf of Swindon Chamber of Commerce.

SCC broadly supports the aim of this policy but the failure to identify Swindon as a Principal Settlement and the subsequent locational/spatial strategy details means that it will not assist housing delivery to the Swindon HMA as effectively as a locational strategy that takes advantage of extending the (west of) Swindon urban area.

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

5a. If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal (SA), please make them here.

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

6. Please set out the modification(s) you consider necessary to make the Wiltshire 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 Wiltshire 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.

Please see written Overview representation submission on behalf of Swindon Chamber of Commerce

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

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 X	Yes , I wish to participate in hearing session(s)
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The submission of the Wiltshire Local Plan Review for Independent Examination	✓
The publication of the report of the Inspector appointed to carry out the examination	✓
The adoption of the Local Plan Review	✓

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Signature:		Date:	22nd November 2023
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Appendix B:

Swindon Chamber of Commerce Local Area Assembly- Local Policy Priorities Statement (2023)

SWINDON

Local Area Assembly

Local Policy Priorities Statement 2023



ABOUT THE THAMES VALLEY AND SWINDON LOCAL AREA ASSEMBLY

The Thames Valley is a true turbo-economy - the 'Silicon Valley' of Europe and one of the UK's most productive regions. Thames Valley Chamber of Commerce (TVCC) remains the independent voice of business, providing the regional leadership that is helping secure the future economic prosperity of the Thames Valley.

Swindon businesses are shaped by looking east, toward the Thames Valley and London economies, and connectivity to Heathrow. It is part of a wider growth corridor, aimed at capitalising on the opportunities within the Thames Valley region and delivering significant economic growth. The Swindon Chamber represents businesses of all sizes across an array of sectors, including advanced engineering, environment, infrastructure and low carbon technology, health and life sciences, and technology.



AIM AND OBJECTIVE

As the independent voice of local business in Swindon our LPPS outlines the core policy priorities our members will be mobilised in supporting this year.

We aim to maintain the momentum from past LPPSs to ensure we remain focused on helping decision makers, and key stakeholders, understand and listen to what Swindon businesses want, enabling them to succeed and prosper.

Our objective is to present a clear and coherent message on what are the right local conditions to enable businesses to invest, plan for the long-term, work towards meeting net zero targets and secure the County's future economic, social, and environmental well-being.



It is also an invitation to engage with the Local Area Assembly, and our wider membership, who are keen to represent the voice of business and to work alongside you to help shape, frame and deliver solutions that will secure the future well-being of Swindon and the wider Thames Valley region.

LOCAL POLICY PRIORITIES

The Swindon Local Area Assembly has identified the following local policy priorities:

- Engage our key stakeholders and anchor institutions to help deliver the wider aims of our own, and their, policy, economic and investment aims and objectives.
- Showcase the good practice and promote the initiatives being developed by the TVCC's sustainability working group to help business on their pathway to net zero and help SMEs navigate the ESG landscape.
- Endorse proposals that will bring long-term sustainable economic growth and increase productivity, including knowledge-driven, innovation-led science park as part of a long term 2060 Vision for the town.
- Be an active partner with industry and key stakeholders in the education and training sector to support initiatives that will help secure skills development and training.
- Work to help promote the assets, centres of excellence and key sectors that will drive higher volumes and value investment into Swindon. Challenge public stakeholders to invest more in their efforts to secure foreign direct investment.
- Continue to support existing exporters and help raise the awareness of the commercial benefits to business of trading internationally.
- Support initiatives that re-image Swindon town centre, encourage appropriate levels of investment and active town centre management that will help secure its future vitality and vibrancy, strong sense of place and create and employment opportunities.
- Promote the need for an ambition, clear and long-term vision for the future economic growth and prosperity of Swindon.
- Retain our focus on lobbying public authorities to identify and deliver additional new strategic employment sites, within or adjacent to the town, that will meet the present and future needs of business, building a stronger, more resilient, economy.
- Promote efforts that forge stronger infrastructure links with the Thames Valley, including:

i) continuing calls for investment along the Great Western Railway (GWR) line to free capacity and maximise the benefits to Swindon of being within ‘the golden hour’ of London.

ii) Supporting appropriate new infrastructure projects and road safety improvement measures, including the expeditious completion of improvement works on the M4 junction 15, lobbying for the construction of a Junction 16A, a new Western link road between the M4 (J16A) and the A419 to the north of the town, south of Cricklade and the extension of Thamesdown Drive to connect with the town centre, thereby facilitating regeneration of the Cheney Manor area.

iii) Reigniting discussions around the strategic road improvement of the A420 – including its re-trunking to a motorway standard.

A LOCAL ENGAGEMENT, REGIONAL REPRESENTATION AND GLOBAL OPPORTUNITY

The LAA priorities form an integral part of our wider work programme and commitment to regional leadership detailed in our Business Manifesto 2023. This includes focus on four main priorities. Together, they form policies and actions behind which the whole Chamber network will focus:

1

Secure investment in resilient infrastructure and utility networks: promote the continued investment in key digital and transportation networks to ensure they remain resilient to the future needs of business.

2

Expand the depth of our support and services to enable trade and inward investment flows to continue: provide our members with the relevant, direct, practical support and policy information required to operate efficiently and effectively.

3

Deliver regional leadership: support initiatives and promote the contribution our members are making to deliver the region’s future sustainable economic well-being, productivity growth and pathway towards net zero.

4

Put employers at the centre of the skills system and build a stronger and more dynamic partnership between employers and further education providers: through our leadership of two Local Skills Improvement Plans (LSIPs).



LES DURRANT
Chair,
Swindon Local Area
Assembly



PAUL BRITTON
Chief Executive,
TVCC



Appendix C:

Article from The Sunday Telegraph

Business

Swindon turns full circle following Honda pull-out

When the carmaker shut its factory workers feared the worst, but a diverse local economy came to the rescue, finds *Tim Wallace*

Apocalyptic forecasts were not hard to come by in Swindon in 2019. When Honda announced plans to close its factory, unions called the decision “a shattering body blow at the heart of UK manufacturing”. Hundreds of residents marched through the town and Westminster with banners emblazoned with the words “fight to stop the closure”, written in both English and Japanese. Honda bought the Second World War airfield on the edge of Swindon in 1985 that would become the base for its only European factory and make it the biggest employer in the Wiltshire town with 4,000 staff at its peak. Its closure more than three decades later raised the spectre of industrial decline with dire implications for supply chains and jobs as production moved to Japan, where the carmaker is headquartered. Yet behind the scenes, not everyone was convinced. The significant redundancy payments on offer meant many workers were inclined to stay quiet. “The initial reaction was to lobby Honda quite hard to get them not to close,” a local politician says. “But we were inundated with Honda workers saying ‘shut up!’” By the time the factory’s closure was announced in February 2019, around 3,500 workers were still on site. A few hundred staff stayed on to dismantle machinery for sale after the factory’s closure. Now less than 100 employees remain.

The 370-acre site is in new hands after Panattoni, the property company that recently created an Amazon distribution hub next door, paid £700m for the space which will be in operation from spring and is hoped will ultimately create between 8,000 and 12,000 jobs. Kevin Parry worked at Honda from the mid-1990s in roles including final quality adjustment. “I would probably have stayed at Honda until retirement. It was a good employer, it was local to me. I was comfortable,” he says. “When the announcement happened, a lot of people felt it was going to be doom and gloom. But in the end when people left, a lot found jobs.” He took a part-time job at first, then joined a homeless charity in November. “I personally haven’t looked back. I



Swindon's famous Magic Roundabout is symbolic of the situation many former Honda workers found themselves in, looking for new opportunities. However, despite the initial doom and gloom, their fortunes changed

found a job that I enjoy more,” says the 47-year-old, adding he has more time for his role as a borough councillor. Frank Simons, 42, worked at Honda for 14 years, starting on the production line then earning a promotion following a training course. A few months later, he learnt the site was closing after seeing a news update on his phone. “It wasn’t the best, not when you thought they were staying,” he says. He took a six-month course and became a personal trainer. “I thought I might as well do a job I really want to do. I started setting up my business, doing it in the evenings and mornings,” says Simons. “Covid came about and absolutely crippled it. I’ve had to start again.” Simons took a part-time job selling car parts once the factory closed, but

decided to take the plunge in January to run his business, Frank Fitness, full-time. Today, Swindon’s JobCentre is almost eerily empty, with just a handful of jobseekers dotted around the office. However, Ian Gardener, the branch’s manager, says this scene is illusory. The pandemic has forced the centre to conduct most appointments over the phone, and demand has soared. More than 4,800 are on an intensive job search, Gardener says, down from a peak of about 8,000 but well above the pre-pandemic levels of 2,200. But he says little of this surge is linked to the closure of Honda’s factory. Over the whole period of the shutdown, just 150 former Honda workers have sought help from the JobCentre, Gardener says, with the

figure now at 90. Preparation played a key role in staving off mass unemployment after the closure of Honda’s factory. Gardener served on the local taskforce, with the council, union, company and local enterprise partnership, to make the most of the two years’ warning from the carmaker. Efforts were made to offer training, tips on job applications, help for would-be entrepreneurs to write business plans, and financial advice to those considering retirement, with much of the workforce aged over 50. Gardener says Jaguar Land Rover took on some workers, while Amazon’s site brought close to 2,000 jobs with “quite an attractive” package. Care and hospitality bosses are also hiring. Latest data show that the town’s unemployment rate is below the UK average, totalling 4.1pc during the year to September versus 4.8pc for the UK. Paul Swinney, at the Centre for Cities, a think tank, credits the diverse local economy. The town is home to Nationwide’s head office, while the insurer Zurich and Mini both have sites. Good transport links have also helped Swindon become an attractive location as a logistics hub. “It has these other engines, this large core of knowledge-based service jobs which are able to power the economy,” Swinney says. “It is in that sweet spot of having access to a relatively high-skilled workforce, while from a cost perspective it is not that expensive.” Les Durrant, president of the local Chamber of Commerce, says Swindon learnt from the experience of the town’s railway works closing in the 1980s, putting it in good stead when Honda’s shutdown came around. “The fear then was that this was going to be a grievous blow to Swindon,” he says. “Things like that are game-changers. But the old British Rail set things up to regenerate the situation, retrain the staff. “We have a history in this town of overcoming this kind of adversity.” Local businesses such as Industrial

Electrical Wiring, which supplies medical machinery and semiconductors, are keen to snap up Honda veterans. Duncan Game, the company’s managing director, says as demand surges amid a global shortage of microchips, the company is keeping one eye on Honda’s former workers. Ashlea Thompson, of recruitment and logistics company OPX, went into Honda’s factory to talk to staff about their options. In terms of opportunities for the workers, there “couldn’t have been a better time” for the closure, she says. “The work influx for blue-collar staff hit the roof,” Thompson adds. “Distribution, supply chain, logistics – it went bonkers. Had Covid not hit, other

phone repair shop My Phone on Swindon’s Regent Street, says the pandemic has compounded a plunge in footfall originally sparked by Honda’s departure and that of its workers. “It is very quiet. Before, at any time there were a huge number – you could look out the door and see 100 people each side. Now there are 20 or 30,” he says. Walking around the town, Swindon’s deputy council leader Gary Sumner points to regeneration projects either in progress or planned. These range from Zurich’s new office, which is under construction opposite a derelict building that used to house Debenhams, to car parks earmarked for demolition, railway-side buildings becoming co-working sites, and an entire new “cultural quarter”. “We have to change what people expect to see when they come here,” he says. “If we have a cultural quarter, that is a reason to come into town, and then to dwell.” Back on the edge of town is the Rat Trap pub, a few minutes walk from the old factory. Landlord Mark Richardson says locals who used to build cars still come in for a drink or a meal, and that the pandemic has been a much bigger problem than the closure. He held an event for jobseekers in the autumn, but “not many turned up”. His own experience echoes that of the wider town which had feared an industrial slump, but instead demand has remained so high that staff are hard to come by. “We trained up two apprentice chefs – both have been poached,” Richardson says. More than two years after Honda closed its doors for a final time, Swindon has moved on to tackle the challenge of the fallout from the pandemic. “It was like there would be a tsunami-effect when Honda closed, but actually it is just a ripple in the pond,” Parry says. “Nobody says, ‘That was the worst thing that has happened to me’. It felt like it at the time, but now it is like it never happened.”

4,000
The number of workers once employed by Honda in Swindon. When it said it would close in 2019, there were about 3,500

businesses probably wouldn’t have been recruiting at the level they were.” She helped more than 70 staff into jobs including forklift driving and warehousing. She still has 160 vacancies on her books, but Honda veterans are not always keen as the automotive giant offered better pay and conditions than many others can match. Oladapo Ibitoye, now in a part-time role coaching young adults, worked there from 2008. “During my time at Honda, I went from paint department to welding to quality department, as well as the admin role in supply chain management,” says the 40-year-old, who is also a councillor. “Even if you had no formal education, you had the opportunity to progress.” Since the factory shut, a new challenge has presented itself for Swindon and the local economy. Malik Waseem, who owns mobile

Oladapo Ibitoye ‘They gave me so many opportunities’
The 40-year-old worked at Honda from 2008 in jobs from machining engines to procuring supplies. “They gave me so many opportunities,” says Ibitoye, who now has a degree and a masters in business and management. He has a part-time role coaching young adults and is a councillor, but has not yet found the full-time post he wants.

Duncan Game Keeping an eye on Honda’s former workers
The managing director of local business Industrial Electrical Wiring says as demand surges amid a global shortage of microchips, the company is keeping one eye on Honda’s former workers with a view to hiring them. Industrial Electrical Wiring supplies medical machinery and semiconductors.

Ashlea Thompson ‘The work influx for staff hit the roof’
The regional manager of recruitment and logistics company OPX has talked to Honda staff about their options. In terms of opportunities for the workers, there “couldn’t have been a better time” for the closure, she says. “The work influx for blue-collar staff hit the roof.” She has helped more than 70 staff into jobs.

The week ahead

Tomorrow
No scheduled corporate updates

Economics:
Halifax house price index (UK)

Tuesday
Full-year results: Micro Focus, Ocado

Interims:
BP, DCC, TUI

Trading update:
Bellway, DiscoverIE, SSE

Economics:
Goods and services trade balance (US)

Wednesday
Full-year results: Smurfit Kappa

Interims:
Barratt Developments, Dunelm, GlaxoSmithKline, PZ Cussons

Economics:
BRC retail sales (UK); trade balance (Ger)

Thursday
Full-year results: AstraZeneca, Beazley, Relx, Unilever, MJ Gleeson

Interims:
Ashmore, Redrow, Syncona

Trading update:
Watches of Switzerland

Economics:
GDP (UK), Rics house price balance (UK); consumer prices index

(US), jobless claims (US), monthly budget statement (US)

Friday
Full-year results: British American Tobacco

Interims:
Lancashire Holdings, Tate & Lyle, Victrex

Trading update:
Electrocomponents

Economics:
GDP (UK), industrial production (UK), manufacturing production (UK), trade balance (UK); consumer prices index (Ger); Michigan consumer sentiment index (US), Fed monetary policy report (US)

Top 100 shares

Stock	Price	Change on week	52 week High	Low	Div Yld	MktCap £m
3i	1352½	+25½	1507½	1104½	3.0	13163.0
abrdn	239½	-2½	333½	226½	6.1	5229.4
Admiral	2959	-214	3706	2829	9.9	8863.8
Airtel Africa	155	+11	163½	70½	2.1	5825.1
Anglo Amer	332½	+1	357½	250	5.3	44480.7
Antofagasta	1277	-110½	1972	1198½	4.3	12096.5
Ashdale Group	5008	-236	6572	3792	0.9	22296.8
Ass Brit Fds	1884½	-74½	2528	1719	1.4	14919.1
AstraZeneca	8282	-485	9523	6736	2.4	128323.0
Auto Trader Grp	654	+½	751½	538	1.2	6189.0
Avast	620	+9½	620½	418	1.9	6440.9
Aviva Group	289½	+42	4242	2737	1.3	8723.0
Aviva	435½	+1½	445½	339½	4.9	16319.4
BAE Systems	572½	-19½	1957½	456½	4.2	18016.6
Barclays	200½	+3½	219½	111½	1.5	33613.6
Barrat Dev	613	+7½	799½	592½	4.8	6268.2
Barkeley Grp Hds	4144	+23	5383½	3993	0.2	4644.5
BaxiEurValRlt	555½	-10½	651½	500	7.7	5558.8
BHP	405½	+20½	409½	250½	4.0	79785.0
Brit Amer Tob	3211	+46½	3246½	2478	6.7	72682.5
British Land	537½	-8½	563½	435	3.2	4980.8
BT Group	192½	-4½	206½	120½	4.0	19100.4
Bunzl	2719	-67	3000	2122	2.0	9173.9
Burberry	1870½	+13½	2267	1683½	2.9	7476.3
Coca-Cola HBC	2478	+58	2809½	2194	2.2	9067.2

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