

Representations by Swindon Chamber of Commerce to Swindon Borough Council in respect of the Swindon Local Plan Review Regulation 18 Consultation Draft 2023-2043

Contents Page

1.0	Introduction and Background to Swindon Chamber of Commerce	3
2.0	SCC's Engagement in the Development Plan Process	3
3.0	The Swindon Economy	5
4.0	Specific Topic Areas of the Local Plan Review	6

Appendices

Appendix A	Written Questions to Wiltshire Council and Swindon Borough Council
Appendix B	Swindon Chamber of Commerce – Local Policy Priorities Statement (2024/5)

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 (TVCC) 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. TVCC 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 southeast, particularly the Thames Valley corridor, whilst also extending westwards beyond Swindon towards Chippenham, Bath and Bristol. SCC/TVCC are therefore strongly in favour and firmly committed to Swindon being part of a Thames Valley Combined Authority with Oxfordshire, Berkshire, Buckinghamshire and the unitary authority towns within these Counties emanating from the current England Devolution process.

2.0 SCC's Engagement in the Development Plan Process

- 2.1 SCC/TVCC 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, West Berkshire and Oxfordshire. As noted in Section 1 of these representations, Swindon's economic hinterland extends extensively into Wiltshire but also into Gloucestershire, Oxfordshire, West Berkshire and the whole Thames Valley 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). SCC has continued to maintain this position, reflected in the declared Local Policy Priorities for 2024/5.
- 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 almost 10 years. Perhaps more significantly, the Joint Framework has now been abandoned by both Councils and cross-border issues have not been addressed by either Wiltshire Council or Swindon Borough Council, especially concerning additional employment land or the sustainable expansion of the town by way of strategic growth.

2.4 In July 2017 SCC/TVCC 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 and 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.

- 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 Councils. The full text of this documentation is attached as Appendix A. These specific responses have not subsequently been formally withdrawn or superseded and remain in place.
- 2.6 SCC's position in 2025 remains fundamentally unchanged and the representations submitted to the current consultation document are therefore very largely based upon the **Swindon Chamber Council – Local Policy Priorities 2024/5**. A copy of the current document is attached herewith as Appendix B. It is clear from the foregoing that SCC remains firmly of the view that a long-term holistic 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. Unfortunately, this is lacking in both Swindon and Wiltshire Local Plan Reviews.

3.0 The Swindon Economy

- 3.1 For many years Swindon has been viewed, and continues to be 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 Whilst in 2019 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, the acquisition of the site by Panattoni and the commencement of the redevelopment for commercial purposes has signalled a major boost to the local economy, reflected recently in several inward investment moves in the manufacturing/defence sector. Following acquisition by Panattoni comprehensive planning approval to redevelop the site as a major logistics park has been secured and it is anticipated that this will ultimately produce more jobs on the site than existed when Honda UK were manufacturing there at their maximum output.
- 3.3 SCC believes that it is 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, remain positive and conducive to continuing to attract inward investment.
- 3.4 Swindon town centre has suffered the inevitable effects of the COVID-19 pandemic which, coupled with the accelerated trend of home working that accompanied the pandemic and continued increase in internet shopping, is now reflected in significantly less footfall and shop and office closures. Whilst SCC supports and endorses the general intent of the Local Plan Review's policies towards addressing this issue it believes that the Review lacks the long-term vision, strategy and guidance required to resolve this issue. This issue is dealt with in more detail later in these representations.

4.0 Specific Topic Areas

Overall Strategy

- 4.1 SCC generally support the overall vision and strategy for the Local Plan Review, albeit over a shorter timescale than we would prefer. The Council's vision to build a better, fairer and greener Swindon is supported. SCC also supports the general strategy of the Local Plan Review to focus major development on the urban area of Swindon and in particular the town centre. The general thrust of the Local Plan strongly reflects the Council's aspirational "Heart of Swindon" document and parallel initiatives being run to deliver this. However, the Local Plan Review still has a relatively short time span and does not contain any long term (i.e. 2050 or 2060) vision to guide equally long-term infrastructure planning and funding. The Local Plan Review, like its Wiltshire equivalent, has been prepared in relative isolation and consequently many cross-border issues are not addressed.
- 4.2 Although supportive of the general principle of focussing and meeting much of the town's future development requirements in the town centre, there is a serious concern over the viability of this, particularly where high-rise high-density residential development is concerned. The Council's own Viability Consultant's work has highlighted this as have many professional property agents familiar with the Swindon development market. Notwithstanding the fact that the Council see this particular item of the Plan as a later stage element, land and property values do not change rapidly, and the Local Plan Review's overall strategy may well prove to be over-optimistic. This must therefore be a matter of serious concern.
- 4.3 If this proves to be the case, the delivery of much needed housing, especially affordable housing, would place further constraints on the already tight labour market and further hamper the regenerative initiatives currently being planned. This is dealt with elsewhere in these representations.
- 4.4 The Local Plan Review strategy will therefore be heavily dependent upon the existing strategic allocations being carried over from the existing adopted Local Plan. All of these are running a long way behind their intended delivery and even with the identification of some new allocations, there is a real danger of SBC not being able to identify a deliverable 5 year housing supply as required by current national government policy.

Joint Working with Wiltshire

- 4.5 The success of the Swindon economy is totally dependent upon the correct balance between people, homes and jobs in the functional economic market area. This very clearly covers parts of the Thames Valley areas of Oxfordshire and West Berkshire, but also the eastern corner of Wiltshire as a significant amount of Swindon's built form sits within the administrative area of Wiltshire Council, notably two of the town's major employment areas of Windmill Hill/Lydiard Fields and Blagrove. Further to the north significant areas of new housing contributing to meeting Swindon's housing needs have been developed also within Wiltshire Council's administrative area. There has however been little joint working between the two authorities and Swindon Borough Council has opted to "consume its own smoke" as far as meeting both housing and development needs are concerned. The net effect of this is that the Wiltshire Local Plan review, currently at the Public Examination stage, does not view Swindon as a Principal Settlement leaving it, in policy terms, effectively as a village where meeting economic needs (within Wiltshire) would not be viewed as compliant with the Plan's strategy or policies. Whilst this is unfortunate, it also places an even heavier burden upon Swindon Borough Council to meet such needs from scarce resources within the Borough and SCC is unconvinced that this has been achieved.

Housing Provision

- 4.5 It is SCC's belief that the success of the Swindon's economy is heavily dependent upon achieving a correct balance of people, homes and jobs. In Local Plan terms, this effectively means that the town has sufficient people to meet the requirements of the local job market and the provision of housing allocations and related policies to deliver an adequate supply of homes to meet the market demands. Alongside this there needs to be a range of commercial premises and new sites to meet the needs of both expanding local firms along being able to secure inward investment opportunities. An imbalance in any of these component parts leads to problems of overall labour supply, lack of skills and failure to achieve economic potential. It is absolutely essential therefore that the Local Plan identifies sufficient land and workable associated policies to ensure that this part of the requirement is met.
- 4.6 As far as the housing provision element is concerned, SCC does not want to enter into the debate about precise numbers (as this is a matter for the most part down to the housebuilding industry) nor comment on site specific issues but rather focus upon the overall strategy and its prospects of successful delivery. In this regard the heavy dependence upon high-rise high-density housing on the edge of town centre sites is of concern, primarily because of the proven viability issues.
- 4.7 Alongside this issue SCC believes that the Local Plan Review housing policies could be more positive towards allowing small windfall developments, both within the town and village settlements. Historically, small sites promoted by local developers have contributed significantly to the town's housing supply to compliment the volume housebuilding coming forward from the larger, strategic allocated sites. SCC is therefore supportive of the suggestion that a Settlement Boundary Review may be carried out as this could play an important role in helping to shape a more positive approach to this particular aspect of housing supply.

Employment Land

- 4.8 SCC is supportive of the Local Plan Review's approach to safeguarding major employment sites, although concerned that no new major employment sites are identified as part of the proposals. The former Honda site will, it is accepted, probably deliver more employment space and employment opportunities than when occupied by the car manufacturer, although Panattoni are catering solely for the logistics sector and it is unlikely to provide premises for the manufacturing sector or firms requiring bespoke premises for their specific requirements.
- 4.9 SCC strongly support the Local Plan proposals to develop a "Knowledge Central" district within the town centre for business purposes.
- 4.10 Consequently, the Employment Policies in Chapter 7 (SP4 and FE1 to FE7) are broadly supported, subject to detailed comments elsewhere in these representations.

Town Centre

- 4.11 SCC supports the general policy thrust of the Local Plan Review to regenerate Swindon town centre, subject to the detailed points made in these representations.

General Observations on the Local Plan Review Policies

- 4.10 The general wording of many of the policies throughout the Local Plan Review are lengthy and lack criteria that define what the policy requires for positive compliance. In spite of being lengthy, many of the Local Plan Review policies are also lacking in fine texture detail as to delivery mechanisms. SCC would encourage the Council to refine the wording of such policies in the submission draft of the Local Plan Review.



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Appendix A:

“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?”

2.1 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.”

Appendix B:

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

Please see:

<https://www.thamesvalleychamber.co.uk/wp-content/uploads/2024/01/SWINDON-LPPS-2024-1.pdf>