



Central Swindon South Parish Council

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To whom it may concern,
Please find below our collated response to the Emerging Strategies Local Plan Review.

Local Plan Review

Policy LA 6: Old Town Hall and Corn Exchange

- What is the justification for excluding the site from the Parking Standards? If "in view of the parking pressures in Old Town" applies to this site, why is the rest of Old Town a "no parking" area? Adding a parking requirement above and beyond new build in the area seems like a disincentive to restoring the historic building when finances are already difficult for the scheme.

Removal of sustainable policies:

- Why has the sustainable construction policy been removed?
- Why has the community energy been removed from Kingsdown site?
- Why has the communal district heating been removed from Wichelstowe site?
- Policy DM2 (Design of Buildings) makes no reference to energy efficiency, sustainable materials, passive features like orientation and use of passive solar heating, etc.
- DM 25 (Low carbon and renewable Energy) is lacklustre; "encouraged" only. Should new developments have renewable or district energy schemes as standard?

DM 4: Inclusive Design:

- Should include standards around emergency evacuation. Taken from London Local Plan:
 - "are designed to incorporate safe and dignified emergency evacuation for all building users. In developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a fire evacuation lift suitable to be used to evacuate people who require level access from the building."

Employment Land options:

- The Local Plan should promote consolidation of employment onto existing sites. Particularly, major office space shouldn't be allocated to new sites at the expense of existing office space in Town Centre.
- New commercial space should only be allocated as part of other mixed-use developments, such as small offices as part of District Centres.

Residential Standards:

- The Parish Council supports the inclusion of the NDSS.
- This should include standards about adequate natural light in habitable rooms as per guidance in the Housing Health & Safety Rating System.
- Private external space requirements are inadequate for large properties (esp. HMOs). 5 sq/m is specified on all dwellings, whether 1 bed or 10.
- The Parish Council believes this policy could go further. For Ref: London's equivalent policy:
 - Minimum sizes for bedrooms (not just total floorspace),
 - Sunlight,
 - Specific requirements around "storage space that supports the separate collection of dry recyclables and food",
 - Minimum depth and width for balconies, and;

- Additional 1 sq/m outdoor space (over 5 sq/m) for each occupant over 2.

DM 27: Community Facilities.

- The Parish Council believe this should mandate a minimum reasonable travel distance from new homes to nearest community centre. Major developments that are outside of this distance should therefore be required to provide new facilities.
- Similarly, this policy could include a "community centre floorspace per population" measure?

Transport policies (DM 22 new, TR1 and TR2 previously).

- This should include guidance on maximum walking distance to a bus stop from a residence; 400m for urban areas is common elsewhere.

No policies specifically covering HMOs.

- Swindon's existing HMO licensing standards should be incorporated into the Local Plan to enable SBC's planning committee to use non-compliance as grounds for refusing permission.
- For comparison, Bristol's Local Plan Review is suggesting that HMOs are not permitted where:
 - it "harms the residential amenity or character of the locality", impacts noise, disturbance, parking, detrimental physical alterations of buildings, inadequate bin/cycle storage,
 - It would cause any house to have an HMO on each side,
 - Causes an "area" to have more than 10% of stock as HMO.
- Oxford's Local Plan suggests:
 - No more than 25% of an individual street as HMO.
- Camden Local Plan suggests:
 - Must provide long-term "low cost" housing or provide an appropriate amount of affordable housing.
 - Does not involve the loss of two or more self-contained homes.

Could there be a specific Local Allocations policy for Cavendish Square as development area?

- Current bodged redevelopment clearly not good enough and area in danger of ceasing to be an effective District Centre in due course.
- What should be built on the remaining land (the theoretical phase 3)? Should be protected for commercial use (retail, leisure or services).
- Possibility of building "upwards" on both phase 3 site and current low-quality row of shops. What are the maximum acceptable building heights? (Note 4-8 stories specified for Kimmerfields).
- If residential is built on the site, should it have a proscriptive housing mix (size and tenure)?
- How much parking should be safeguarded on the site?

Protection of Green Spaces

The Parish Council would like all green spaces identified as EN1 and EN3 in the 2015 Local Plan such as the green spaces at Oldlands Walk, end of Marlborough Road/Queens Drive and Lakeside to be protected.