

SWINDON CIVIC TRUST - Ref: 108

Swindon Central Area Action Plan 2008

Response to Inspectors Request for a Written Statement – May 2008

General Statement

Soundness of Policies. When starting out on this extended period of consultation it was not made clear from the outset how our comments and objections would be used, and what work we may have to undertake to make them stick. There is a feeling that we have been let down by the Council over this process. The nature of tests to which policies are subjected was not made clear. It really needs to be a taught process to understand it. Having it thrust upon us at rather the last moment does not add up to sound consultation, even as per the Statement of Community Involvement.

The subtleties are not clearly understood. How should we express comments that are to be taken seriously if all we can say is whether a policy is sound or unsound unless the comment is acted on. Many of the policies may be generally sound as far as they go, but how can they be added to, or adjusted under the system? We have done our best within our limited resources to try and comply, but often, where we consider our proposal of importance, we have had to say we consider the policy to be unsound, just to ensure that the proposal is taken seriously. We apologise for this but a better briefing at the outset a year or so ago would have been helpful.

The original proposal is in italics. Our current response to your letter of 1st May is underlined.

It is also not clear what legal weight is carried by the pre-amble supporting text to the Policies. If they carry little or no weight, then the policies in themselves are too generic to provide the specific requirements of the town. A good barrister could play havoc at an Appeal. Would question if the policies would be sounder if they picked up more of the detail from the preamble?

Traffic Management. It has been difficult to do justice to the Action Plan without knowledge of the proposed traffic management for the Area. We understand that this may only be available in December. The mapping is bound to show radical solutions, which themselves may be controversial and prompt even more consultation. When referring to the evidence in the Halcrow Canal study as suggested by the officers, we find it rather less than reassuring. It seems to predict even more peak hour congestion at nodal points outside the perimeter of the Central Area. The lack of a plan and the evidence it would provide, throws into doubt the soundness of many of the policies in the Plan.

Maintenance. Life-cycle maintenance of building, services, equipment, etc. is essential for environmental sustainability. However well a town is designed it can soon become

shabby and inefficient if not adequately maintained. Whilst it is possible that these matters are covered in separate planning guidance documents, mention of it within applicable policies such as Public Realm and the Sustainable Strategy would enhance their soundness.

Democratic Process. The fact that this plan has been put out to consultation shows intent to encourage democratic input. This is to be congratulated. The issue is that the process used by the Borough has not been sufficiently robust to draw out a fully informed debate, that would add richness to the plan. The various forum have been too controlled and unimaginative in their approach. As for Road Shows and post-it notes, it is difficult to see how these can be developed into the full blown criteria that the Inspector requires in order to validate (or not) the Plan. For these reasons we believe that the public input into the Consultation has been weak, to the detriment of the soundness of the Plan.

During the development of the proposals for the Central Area, over a course of several years, commencing with the study carried out by Shillam Smith, the Trust has held a number of its own events to help engage its members in the process. Two of the most successful were events led by Ove Arup, consultants to The New Swindon Company. These events held in conjunction with The New Mechanics' Institution Preservation Trust, were among the most informative and generated good, informed discussion. These were held 5 years ago, and since then we have received little in the way of support or resources to hold similar events of the same quality.

Clarification of Submission Paper issues raised by the Trust

"Pg 18, Tall Buildings - last paragraph

Object to the word: considerable. This is subjective and the interpretation could easily defeat the argument in the previous paragraphs. Even "moderately higher" may adversely affect the amenity of a neighbourhood."

Design Strategy, Pages 18 and 20, Policy 1 continued.

Agree that this policy is required. Do not agree that it is sufficiently robust.

The CAAP is about a specific area with its own defined boundary and issues. It can afford to be more prescriptive in addressing relevant issues. The policy stated is broad-based, generic and could apply to virtually any large building. Consider that the policy should also seek to address the following, with relevance to the CAAP's specific area of context.

There is a considerable amount of two storey housing within the area and abutting the Area. Clear guidelines need to be set out regarding the mitigation of impact of large/tall buildings upon any surrounding low-rise residential. With diagrams such as are employed in assessing good estate layout. i.e. microclimate effects, overshadowing, privacy, etc. Whilst the CAAP document was circulating for comment, a project was approved for the old Swindon College site. This contains a tower block and one could

reasonably expect that the policy in the CAAP document would be respected. Either it was not respected, or it was inadequately interpreted, but the surrounding residential community is concerned that the impact of the tower will have a detrimental effect upon their amenity.

The policy is not founded on a robust and credible evidence base and needs to be specifically clear where large, multi-storey buildings/tower blocks can be sited in order that low-rise residential areas will not be adversely impacted.

“Pg 19, Policy 1

The design policy should also include: “the respect for grain and texture”, with particular reference to the residential townscape. This aspect has already been well covered in the guidance for backland development. Extracts from this guidance could be used in respect of new residential development in existing residential areas within the central area, irrespective if it is backland or not.”

Design Strategy, page 19, Policy 1

Withdraw “grain and texture”. There is a limit to how good design principles can be specified beyond certain practical and sensible guidance. Really good buildings depend on the intelligence and sensitivity of the commissioning culture. Developers, architects, building control officers, planning committees and the communities they represent all have their part to play in determining a good end product that suits their cultural aspirations.

Planning Control and the Planning Committee are the gatekeepers who approve what development can happen in the Town. However sound the CAAP is, unless these bodies wholly support it, inferior product can occur. At one stage in the evolution of the Plan it was proposed that there be “Gateways” indicating that one had arrived at the Town Centre. These were to be demarked by building of high quality, promoting the image of as a place of high excellence. One site, at the corner of Station Road and Corporation Street has been demarked with an ugly block of flats, another at the corner of Princess Street and Fleming Way has approval for a hotel, the design of which could have come from a second rate firm of fifties architects. Neither uplift the spirits or announce the fact that the town wishes to represent the cutting edge of excellence.

The policy is not the most appropriate in all circumstances and propose that the policy promotes the importance of the involvement of CABE. Reference to “The Swindon Design Guide” also should be included in the policy (although this Guide also needs to be strengthened.)

“Pg 26, Policy 2

Ongoing maintenance of the measures stated in the policy is also an important management issue. It needs to be stressed in the policy.”

Sustainable Strategy, page 26, Policy 2

All of the items under this policy require service installations, plant and equipment, all of which require regular maintenance to ensure efficiency. It is not clear from either the Policy or the Implementation Plan how ongoing maintenance will be implemented or monitored.

The policy fails both parts of parts of test 7. A policy statement on maintenance implementation and monitoring is required to correct the situation.

“Pg 30, Gateways

It is not clear in the document how the "Gateway at Kingshill" will serve vehicular traffic from the West.”

Public Realm, page 30, Gateways. Page 44, Policy 3

It is not clear in the document what purpose the “Gateway at Kingshill” will serve other than a demarcation for people entering the Central Area by canal boat. The Canal Route Study suggests a signature bridge or a piece of public art. Do not object to either proposal, but suggest that most people entering Swindon would not recognise this as a Gateway to the Central Area.

The policy is unsound as it does not consider all the alternatives. The Public Realm Statement needs to indicate where most people entering Swindon from the West will encounter a Gateway.

Public Realm, page 34, The Railway Village

The objection to the bus route down Oxford Street is withdrawn, as this route was in the plan by error.

Policy is unsound as it is not the most appropriate. Replacing the bus route down London Street is no better. A genuine attempt needs to be made to remove all through traffic in the Railway Village Conservation Area (which itself is proposed as part of a World Heritage Site).

“Public Realm, Pg 44, Policy 3

Areas outside pubs, especially popular concentrations need to much better lit at night and be provided with sound methods of disbursing "revellers" with the least disturbance to residential neighbourhoods.

Consideration to these nighttime economy issues is being given by the Council's licensing department and the CivicTrust. The project is called "Night Vision", and its findings and recommendations should be included in the Public Realm Policy. (talk to the Licencing Officer, Lionel Starling).”

Policy unsound as it does not consider all the alternatives. Propose that specific mention of the recommendations be made under Infrastructure Requirements

“Faringdon Road - Green Spine

Assuming traffic can be extensively removed from Faringdon Road, the opportunity exists to turn this into a lineal park leading into the GWR Park through the existing gateways. Certainly a traffic free area would be of benefit to its abutting residential population and be an asset to the general greening of the town. This work should be carried out as soon as the traffic issues are resolved, and not wait for “the canal”.”

Public Realm Strategy, page 38 (map) and Page 44 Policy 3

The map on page 38 shows several green links but no mention of them is made in the text or the Policy. If it is possible to resolve the traffic issues, then urgent consideration should be given to using the Faringdon Road link as a bus priority route that also incorporates its status as a green link. This would remove the use of the Railway Village Conservation Area as a major bus route, thus significantly improving the amenity of its residents. The policy is unsound because it does not address these issues.

At present over 60 busses pass through Emlyn Square and down Bristol Street. This should be a quiet residential area, not subject to this intrusion of heavy traffic. Even more busses serving the Southern Development Area, are planned to pass through the Village.

There could be a phased operation. Convert Faringdon Road to a green link serving bus priority routes. When the green spine passing under the railway is complete, divert most busses down this route, leaving say one service to pass through the Village. This will probably occur when the canal systems outside the Borough are lapping up to its boundaries. At this stage the final decision as to where to run the Swindon canal link can be made.

Policy is unsound as it does not consider all the alternative. Propose that the green links shown on the plan be incorporated into the body of the text and into the Policy.

Policy is unsound as it does not consider all the alternatives. Propose that Faringdon Road be used as a green link and as a bus priority route, thus removing the routes through the Railway Village. (relevant alternative)

“Pg 50, Policy 4

We object to the proposed canal route on the following grounds:

Even if all the private car traffic were removed from the town centre, there would be a corresponding growth in public transport, and more commercial traffic serving the “vibrant” shopping areas. Much of this is coming from Junction 16 to the west. We have grave doubts that with existing limited road widths from the ring road (partly governed by privately owned properties flanking the routes) and the limited funding for road works

outside new development areas, that the transport issues of the Kingshill Gateway can be resolved. We need more evidence that there is a sound traffic policy that takes these issues into account, before we can believe, and support the closure of the road system from the west.

That the canal as detailed, breaks the wild-life corridor where the canal runs through the town. The alternative by-pass route would better serve this purpose. Obviously if it were embedded in our suggested lineal park, some of this objection would be overcome.

Our greatest concern is the economic pressure that would be placed on the canal to produce its "wow" factor. Many of the properties in the vicinity of the canal are rented or leased. Whilst adjacent property owners may benefit financially, those in rented properties will suffer from severe rent increases, leading to displacement of a currently fairly well integrated community. We consider that more well-directed consultation of residents who would be affected by the canal, is required before any further promotion of the canal is undertaken.

We do support the positioning of a canal basin and the upgrading of the properties in Fleet Street. However we consider that the basin would be better served by a spur from the north, connecting to our preferred canal by-pass route."

The Reinstatement of a Canal through Central Swindon Strategy, page 50, Policy 4

Support the provision of canal links through the Borough of Swindon that link it to the network shown on the map on page 47.

The policy is unsound as it fails both parts of test 7. However formulation of the stated policy regarding the proposed alignment of the section of the canal through the Central Area is unsound on the following grounds:

The lack of a robust methodology in the assessment of a appropriate route, including possible alternative routes, their impact on the environment and adjacent communities (by informed consultation) and potential for mitigation, their compatibility with the environment and adjacent communities, potential constraints, impact on existing infrastructure, impact on future potential development. (Attached is an article published in the Swindon Civic Trust Newsletter suggesting that there are alternative routes.)

The lack of an Options Appraisal based on the above.

The lack of any information as to how and when the canal routes external to the Borough will be ready to be linked through the Borough. To build an expensive section of canal with no knowledge of when it would be connected to the rest of the system would seem foolhardy. As it may not be practical to obtain this knowledge or the finance required in the near future, the route would need to be protected from encroachment by any other development for some period of time. A robust assessment of a practical route and its incorporation into Borough wide planning policy could provide its best

protection in the long run.

“Pg 55, Transport - Busses and Coaches

Already on routes served by busses running at 10 minute intervals, there are problems with capacity at peak periods. If more people are to be encouraged to travel by bus, then a higher frequency of busses will be needed at peak periods. This higher demand needs to be built into any transport equation.”

Public Transport Strategy, page 55, Public Transport, Policy 7

Can offer no evidence other than as a bus user who notes that at peak periods, waiting passengers are often left standing because the busses are already full.

“Provision for Coaches has not apparently been considered in the plan:

Two types: Long Distance - short stopover to pick up passengers

Touring and Day Trips - stays up to several hours or overnight.

Provision for both - possibly close to the station. Many day trip passengers are elderly, and if they wish to visit the town, the walk from the Kemble Drive Parking is a bit far.

Having to catch another bus to get into town would be a complication too many.”

Again as a coach visitor to other towns, it is observed that day trip passengers form an immediate good impression of a town if the coach can park close to the town centre and clean toilets are readily available. Surely this must be good for the retail business.

The policy is unsound as it has not considered all the alternatives. Propose that the policy takes into account higher frequency of service at peak periods and the provision for parking for touring and day trip coaches close to the Town Centre and its attractions.

“Pg 58, Policy 8

Policy should stress the need for safe cycling conditions at all times. Cyclists having to share a road with a constant stream of busses and heavy commercial vehicles are courting a death wish, even if it is only a short distance between protected routes.

New housing development, especially affordable housing requires secure and convenient storage provision for bicycles, if this mode of transport is to become a well patronised. This could influence other planning documents.”

Pedestrian and Cycle Movement Strategy, page 58, Policy 8

The policy is unsound as it is not the most appropriate. The policy needs to be strengthened by more references to the safety issues outlined in its supporting text. It should also include that new housing within the Central Area requires secure and convenient storage for bicycles, motorised chairs, trolleys and buggies.

“Pg 73, Policy 12

Object to the fact that the importance of secondary shopping is not adequately recognised. Whilst the Retail Core may attract the chains that can pay the highest rents, it is the secondary shops which provide much of the interest, and are often the factor which attract people to visit the centre in the first place. The current proposals relegate this important sector to the outer darkness. Proposals need a rethink if the "vibrancy" is to be captured.”

Development Requirements for the Retail Core, page 73. Policy 12

Consider the map supporting the policy regarding Secondary frontages to be unsound as it fails both parts of test 7. It shows the secondary frontages isolated and fragmented from the primary retail core. It is often the attractiveness of the secondary offer that endears people to a town centre. More thought needs to be given as to how the two types of frontages can interact with each other to provide the required 'vibrancy'.

“Pg 78, Policy 13

The cultural offer proposals for the Cultural Quarter are mainly directed at the high end of the presentation of achievement in the arts. There is little or nothing on offer for the practical aspects of the work that goes into the development of artistic achievement. The studios, workshops, rehearsal rooms, space for experimentation and mistakes.

The ability to offer the community a variety of affordable spaces for formal and informal activities should also be seen to be a vital function of the town centre acting as a focus for the community as a whole

We object that no allowance has been made for these in the Action Plan, although, they in themselves are often significant contributors to the vibrancy and vitality of centres. Evidence of need has been established by the Council through consultation and by the Community Sector active in the town. This issue should be taken up with the Arts Officer, who conducted the consultation and with the organisations representing the Community Sector.”

Work carried out by the New Mechanics' Institution Preservation Trust Ltd at the now extinguished "Community Crossroads" demonstrated the need for affordable spaces for creative community activity.

The Promenade, page 78, Policy 13

The policy is unsound as it fails both parts of Test 7. Workshops and studios should be a clear commitment under Infrastructure Requirements.

“Pg 99, Policy 17

The semi-used and empty buildings in the Railway Village Conservation Area offer an ideal opportunity to house the creative and social aspects of cultural development. It is not by nature an aggressively economic area, and offers an ambience which would be appealing to many sections of the community. There is a educational philosophy that peoples involvement in the arts and its achievement is good for personal development, and the work carried out by the Mechanics' Institute in the former railway museum has bourne substance to this view.

The buildings referred to comprise the Carriage Works, The Mechanics Institute, the Former Railway Museum, and the cluster of building adjacent to the Water Tower. Whilst we appreciate that these are in the main in separate or private ownership, we see no reason why this form of usage should not be considered as an integral part of planning policy for the central area.

We thus object to a policy which does not fully recognise the contribution the Village can make to the social and cultural development of the peoples of the town.”

Railway Village Conservation Area, page 99, Policy 17.

The policy is unsound as it fails both part of test 7. It does not accept that there are buildings in the area that could make a significant contribution to the cultural development of the town in the provision of workshops/studios, meeting places, rehearsal and performance spaces.

Correctly developed using a social enterprise model this area could provide a vital incubator for the delivery of cultural vitality to the town.

“Pg110, Policy 18

We object to the fact that there is no policy regarding houses in multiple occupation. The issues and problems that arise have been well aired and documented at the Community Planning Forum. There needs to be robust policy incorporated into this section to ensure that the problems of HMO's can be contained and balanced, family friendly communities encouraged.”

Central Swindon's Residential Communities, page 110, Policy 18

The policy is unsound as it fails both parts of test7. We accept that there is ongoing work to produce a separate policy on HMO's in order to achieve a balanced communities, but a much stronger reference to this issue needs to be made in the policy.

“Pg116, Policy 19

We object to the fact that Old Town has been included in the Central Area. It should have its own Action Plan, tailored to its needs, as should the other outliers at Rodbourne and Gorse Hill.”

The policy is unsound as it fails both parts of test 7. There is too much dead ground between the Central Area and Old Town to suggest that it plays a vital role in the Central Area. Even existing Retail up Victoria Road is being degraded. In the life of this consultation, 83 Victoria Road has received approval to change from A1 to C3 (dwelling) and a current application (S/08/0641) 67/69 Victoria Road proposes the demolition of a photographic shop and a dance studio to be replaced by residential development. The market does not seem to accept the premise that there is continuity between the Central Area and Old Town. i.e. There is a long stretch which does not contain the interest of active frontages, and what there is, is being constantly eroded. We do not consider that there is a genuine need for the Town Centre to be so tenuously linked to Old Town. It appears to be an excuse for Old Town to retain certain amenities that would in fact better serve the public if these amenities were closer to the public transport hub.