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**COVINGHAM**  
PARISH COUNCIL

Janet Busby  
Planning  
Swindon Borough Council

Dear Janet

**Re: Planning Consultation - S/OUT/20/0160, Land At Foxbridge Village New Eastern Villages  
Wanborough Road Wanborough Swindon**

**Covingham Parish Council** object to the above-mentioned planning application because of the following reasons:

- a) The application is for the South Foxbridge development and it is inappropriate to view the South plans without the North plans.
- b) The application does not demonstrate that the development will not increase the flood risk to Covingham
- c) There is insufficient detail paid to the traffic management.
- d) Noise management is to be performed by construction techniques. There is no application for a noise barrier. If granted the permission must refuse (as it has not been requested) a noise barrier, or if one has to be constructed, it must absorb the noise, not reflect the noise towards Covingham.

#### **Part Application**

It is not possible to approve this application because there is no indication as to how the two segments of the development will interact.

Whilst we accept that there are two developers involved in this area, it is considered to be one development and should be treated as such. It should be mandated that the two applications be submitted simultaneously to allow a joined-up approach with regards to considering the impact one has on the other, and subsequently on surrounding areas. It is impossible to second guess and provide an informed response. For this reason we formally **object** to this application.

#### **Increased Flood Risk to Covingham**

The documents talk about the Western Drainage being restricted by a culvert with a capacity of 16.6 l/sec. Flood risk reduction is apparently achieved by limiting the flow at Discharge Point A to 9.3 l/sec. However, this is drainage from the proposed Southern development. The total drainage from Foxbridge (North and South) is supposed to be limited to 9.3 l/sec. The flood risk to Covingham is not a factor of the culvert alone. Section 6.34, of the Flood Risk Assessment and Surface Water

Management Strategy (ES Chapter 7.1 Flood Risk Assessment of this application) Flow Exceedance Routes, takes flood water to the Southern Connector Road (SCR). As drainage from south of the SCR flows west, there will be drainage under the SCR in a South to North direction. This water will flow downhill, which is in a northerly direction and into the Dorcan Stream Flood Storage Area and Wanborough Road Bridge. The restriction at the Wanborough Road is known to have caused actual house flooding on three occasions. Thus, the flow exceedance routes will increase the flood risk to Covingham. Also, the strategies are based on managing a rainfall of 5mm. During the past three months, many days have seen at least 10mm of rainfall on a daily basis.

It is noted that existing drainage within the Foxbridge site has been poorly maintained and leads to local flooding. Local flooding within a flood plain is what happens in a flood plain. If the drainage is altered, then the local flooding will initially be held within Sustainable Urban Drainage Systems (SuDS), and quickly discharged into the areas of Covingham vulnerable to flooding.

The proposal quotes the **Swindon Local Plan** as a feasible guidance document. We believe that the information provided in respect of the Foxbridge development is technically flawed and also does not honour the statements in Local Plan Policy DM36.

The drainage from the SuDS in the Northern development known as Foxbridge is routed under the A419 and along a channel that joins Dorcan Stream above the Kestrel Road Bridge. The aforementioned channel, and Dorcan Stream were the major contributors to the floods of 2007, floods before this date and near flood events after this date.

The land is noted as a functional Flood Plain, which does not give up its water after 6 hours.

There is a high risk of surface water flooding within the site.

It is stated that the site is outside of the region expected to see ground water flooding. We do not believe that this is the case.

The document states that there has been flooding in the vicinity. As it appears that Swindon Borough Council DO NOT actually know what happens during flood events in this area, the statement is regarded as understated.

This development contravenes Policy DM 36, part 2. This will not result in a net reduction of the flood risk in Covingham.

The development cannot be done without a net loss in Flood Storage Capacity within the development boundary which would increase the risk of flooding to Covingham.

In the draft Swindon Local Plan that has recently been the subject of a consultation, Foxbridge is included as a strategic site. The additional emphasis that has been included (Part 6), states all development should not adversely affect flood routing and thereby increase flood risk elsewhere. Opportunities should be sought within the site design to make space for water and therefore reduce flood risk elsewhere. This is an appropriate course of action that needs to be applied in this application.

The existing Swindon Local Plan EN6: Flood risk states: ensuring that development does not increase the risk of flooding elsewhere including on adjoining and surrounding land. We do not believe that this has been actioned in respect of the Foxbridge development.

The water storage and movement across the flood plain of Foxbridge will be done in such a way that it attempts to reduce the flood risk to Foxbridge. The land where houses will be built currently retain rainwater, with very little actual drainage. The SuDS will hold back a few hours of rainwater, before discharging into Dorcan Stream, and further filling the Flood Storage Area. This is completely inappropriate in the current climate, considering the rainfall patterns for the last few months. The building of the site, within the constraints of the Swindon Plan will increase the flood risk to Covingham.

In **Covingham Parish Council's** opinion, the way to mitigate the perceived increase in flood risk to Covingham is to increase the capacity of the Dorcan Stream culvert under the Wanborough Road. The proposed Foxbridge development is upstream of this culvert. The discharge from the site (when the SuDS are full) will add volume to the water held in the Dorcan Flood Storage Area, the release of which is restricted by the culvert. When the culvert has reached capacity in the past, the water has been held back and parts of Covingham have been flooded.

We feel that the developers have not considered **Covingham** in the production of this application.

### **Traffic Management.**

The Southern Connector Road as it runs through Foxbridge will be subject to a 30mph speed limit and there will be two signalled crossings connecting the northern and southern parts of this development. There is nothing in the Transport Plan which states that traffic will be prohibited from turning right into Foxbridge from the Wanborough Road, having come through Covingham. If it is planned to be permitted, despite objections, then Foxbridge will be split when the Southern Connector Road becomes a 'relief road' for the A419. The A419 is currently over capacity and this is expected to get worse with the straightening of the 'Air Balloon' junction in Gloucestershire. The Junction 15 improvements have been delayed. It is essential that 'White Hart', Merlin Way, Southern Connector Road, Common Head does not become a valid route when the A419 is at a near standstill (which is a daily event during the week).

### **Noise Reduction**

Noise management is to be performed by construction techniques. Unexpectedly, there is no application for a noise barrier. If permission for one is granted it should be so constructed to absorb noise, not reflect the noise towards Covingham.

Yours sincerely

*L Evans*

Laura Evans  
Clerk & RFO Covingham Parish Council