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COVINGHAM
PARISH COUNCIL

17th August 2020

Janet Busby
Planning
Swindon Borough Council

Dear Janet

Re: S/OUT/ 20/0533 - Outline application for the erection of up to 299no. dwellings, commercial facilities up to 300 sq.m. (Use Classes A1/ A2/A3/A4/A5/ B1 & D1) with associated parking, landscaping, drainage, and heritage trail - Access not reserved.

At: Land at Foxbridge Village North, Wanborough Road Swindon

Covingham Parish Council Object to the planning request **S/OUT/20/0533, Land At Foxbridge Village North Wanborough Road Wanborough Swindon** because of the following reasons:

- a) The application is for the North Foxbridge development and it is inappropriate to view the North plans separately from the South 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 includes the construction of noise barriers. There is no detail as to the construction material to be used. There has been no assessment as to the impact on Covingham, should the barrier simply reflect the noise.

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.

This is particularly the case when it comes to drainage and flood risk mitigation.

Increased Flood Risk to Covingham

The application states that there is an allowable discharge peak rate of 10.5 l/s through a culvert under the A419. The south application also states that it will discharge water through this culvert.

The flood risk to Covingham is not a factor of the culvert alone.

In the application for the South Foxbridge development (see Section 6.34 Flow Exceedance Routes) excess flood water flows to the Southern Connector Road. This excess water will flow northwards through the north development. The North plan is to allow this water to continue to flow north, and after the A419 drain is overloaded, continue flowing north into the Dorcan Stream Flood Storage Area and the restrictions of the Wanborough Road Bridge. The application for the north development does not appear to factor this in. Once the storage capacity of the north ponds is exceeded, the excess water flows north. All this water flows into the Dorcan Stream Flood Storage Area. The discharge from the flood storage area is through the culvert under the Wanborough Road. There is insufficient capacity through this culvert to prevent flooding in Covingham before you factor in the additional water displaced by the Foxbridge Developments. It is a known fact that under extended heavy rain (over a few days) Foxbridge becomes waterlogged and retains water for several days.

The restriction at the Wanborough Road is known to have caused actual house flooding on three occasions. Therefore the flow exceedance routes will increase the flood risk to Covingham. Also, the strategies are based on managing a rainfall of 5mm. At all times of the year, many days have seen at least 10mm of rain on a daily basis.

It is noted that existing drainage within 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 SuDS, and quickly be discharged into the areas of Covingham vulnerable to flooding.

The proposal is supposed to follow 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.

With regard to the application, Chapter 6, Hydrology and Drainage:

- 6.9.2 states that the proposed development would not create an unacceptable increase in flood risk elsewhere. This implies that there would be an increase, and that this is deemed an acceptable increase, to the flood risk in Covingham. We regard any increase in flood risk totally unacceptable. If the applicants cannot actually reduce the flood risk to Covingham then the whole development should be prohibited. We would also like clarification as to what the applicants consider the acceptable increase in flood risk to Covingham.

With Regard to Appendix 6 FRA_PART1:

- 3.9 The survey was completed in September 2019, which was after a significantly long, hot and dry period. This was inappropriate and it does not reflect the true nature of the land throughout the year.
- 3.13 As stated the area becomes waterlogged, resulting in very wet ground conditions. A lot of this water is retained on this site.

- 3.21 This statement is incorrect, as The Dorcan Brook is designated the main river by the EA.
- 5.18 This *statement* has no basis of truth. There is considerable local knowledge of frequent flooding on a regular basis.

Appendix 6 Part 1, 3.15 states that the site will have a rapid runoff. As stated this will cause surface water flooding and fluvial systems may respond rapidly to heavy rainfall events. Foxbridge, currently retains a lot of water. If the development causes rapid runoff, then as stated in the application this will cause problems with the flood storage area and exacerbate the problems with Dorcan Stream.

Appendix 6 Part 1 5.16 acknowledges that Wanborough Road suffers from flooding. 5.18 states that there is no mention in the SFRA or anecdotal evidence to suggest the developable area of the site **has been subject to any historic flooding**. As it appears Swindon Borough Council do not actually know what happens during flood events in this area, the statement is regarded as understated.

With regard to the Swindon Local Plan:

- 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.
- 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.
- Local Plan 7.11.2 states that opportunities should be sought to reduce the flood risk elsewhere. We do not believe 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 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 in recent years. 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 haven't considered **Covingham** in the production of this application. The flooding of Covingham is largely due to past mistakes made by Swindon Borough Council. There existed an opportunity to redress these mistakes, but it appears to have been ignored.

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. Again it

looks like traffic is permitted to turn left, having come from Commonhead Roundabout and travel 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 are only expected to ease the current issues and do not appear to be sufficient for the extra volumes created by the 'Air Balloon' improvements, and the increased traffic from the New Eastern Villages. 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

This application specifies the provision of noise barriers. There is no mention as to the type of barrier to be used. There does not appear to be any assessment as to the impact of construction of noise barriers on Covingham. If permission is granted for this development it **MUST** be on the condition that the noise barriers must absorb the noise, and not be of the type that reflects the noise.

Yours sincerely

Laura Evans
Clerk & RFO Covingham Parish Council