Part B – Please use a separate sheet for each representation

3. To which part of the Local Plan does this representation relate?

Paragraph Number	3.59–3.61 & 8.66–8.78	Policy Number and Name	SDA12 Land at Wroughton; CSE12 Managing Flood Risk	Policies Map (Section or layer)	

4. Do you consider the Local Plan is:

4.(1) Legally compliant	Yes		No	✓
4.(2) Sound	Yes		No	✓

Please tick as appropriate

Representations should focus on whether the emerging Plan is legally complaint and sound in accordance with paragraph 36 of the 2024 NPPF. This means assessing whether it has been positively prepared, is robustly justified and evidence led, is effective, and is consistent with national planning policy.

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound. Please be as precise as possible.
If you wish to support the legal compliance or soundness of the Local Plan please also use this box to set out your comments.

Policy SDA12 does not demonstrate, in sufficient site-specific detail, how the proposed 485 homes can be accommodated without exacerbating Wroughton's existing, and well-documented, flood risk.

1. Established history of flooding in Wroughton
Wroughton has an established history of flooding, particularly associated with surface-water runoff. Flooding frequently affects numerous roads, including Hay Lane, Maunsell Way, Falkirk Road, Moormead Road, Barratt Way, The Pitchens, Perry's Lane, Woodland View, Moore Close and Swindon Road.

This documented history establishes the importance of a robust assessment of flood risk when determining the scale, location and suitability of further residential development in Wroughton.

2. Insufficiently specific flood-risk requirements within Policy SDA12
Policy SDA12 allocates land for at least 485 dwellings across WR01 and WR02. Although criterion 4 requires development to incorporate flood mitigation measures in accordance with the Strategic Flood Risk Assessment (2026), the policy does not identify the specific flood-risk constraints affecting the allocated sites or the surrounding settlement. Nor does it identify the drainage infrastructure or flood mitigation measures that may be necessary to ensure that development does not exacerbate existing flooding problems.

Policy SDA12 should provide greater clarity regarding the flood-risk evidence supporting the allocations and the measures required to ensure their safe and sustainable development.

3. Surface-water runoff and downstream impacts
Development of previously undeveloped land can alter natural drainage patterns and increase impermeable surfaces unless appropriately designed and mitigated. Given Wroughton's documented history of surface-water flooding, the impact of the proposed allocations must be assessed not only within the development sites themselves but also upon existing residential areas, roads, drainage systems and watercourses that may receive runoff from those sites.

Clear evidence should be provided that development at WR01 and WR02 will not increase flood risk elsewhere in Wroughton.

4. Cumulative impact of the proposed allocations
For matters relating to flooding, it is vital that the combined impact of development at WR01 and WR02 should be assessed.

Separate site-specific drainage strategies may not adequately address the cumulative implications of development where sites affect shared drainage networks, watercourses or downstream areas.

A coordinated assessment of surface-water drainage and flood risk is therefore necessary to establish whether the proposed scale of development can be accommodated without worsening existing conditions.

5. Climate change and long-term flood resilience
Food-risk assessments supporting the Wroughton allocations must take full account of climate change and the potential for more intense rainfall events over the lifetime of the proposed development.

The assessment should demonstrate that drainage systems, attenuation measures and other mitigation will remain effective under appropriate future rainfall scenarios.

Further to these points, the Strategic Flood Assessment that is referenced in the Local Plan fails to mention Wroughton at all. Considering Wroughton’s history of flooding, it is an oversight in the Plan for Wroughton not to be mentioned in the wider context of flood risk across the borough.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Modifications must be made to Policy SDA12 to ensure that the proposed residential allocations are supported by robust flood-risk evidence and that necessary drainage and flood mitigation infrastructure is secured and delivered at the appropriate stage of development.

The following modifications are necessary to make the Local Plan sound.

1. Demonstration of flood-risk suitability
Swindon Borough Council should demonstrate, through the Strategic Flood Risk Assessment and supporting site-specific evidence, that the proposed allocations at WR01 and WR02 are appropriate having regard to flood risk from all relevant sources.
This should include surface-water flooding, groundwater, ordinary watercourses, existing drainage infrastructure and the potential impacts of climate change.
The council should explain how the documented history of flooding in Wroughton has informed its assessment of the suitability and capacity of the proposed allocations.

2. Comprehensive assessment of surface-water drainage
The flood-risk evidence should identify the existing drainage characteristics of WR01 and WR02, including natural flow paths, receiving watercourses, drainage infrastructure and any downstream areas potentially affected by development.

The assessment should demonstrate how surface-water runoff will be managed without increasing flood risk to existing properties, roads or other infrastructure. Particular attention should be given to areas of Wroughton with a documented history of surface-water flooding.

3. Assessment of cumulative flood-risk impacts
A coordinated assessment must be conducted of the cumulative flood-risk and drainage implications of WR01 and WR02, together with other relevant committed development affecting the same drainage catchments.

This should demonstrate that the combined effects of development will not increase flood risk elsewhere and that proposed drainage measures are compatible with the capacity and operation of receiving drainage systems and watercourses.

4. Identification and delivery of necessary flood mitigation infrastructure
Where the evidence identifies a need for drainage improvements, attenuation facilities, sustainable drainage systems or other flood mitigation measures, Policy SDA12 should establish clear requirements for their delivery.

Please note, in your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☑	**No**, I do not wish to participate in hearing session(s)	☐	**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please note *the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

9. Do you wish to receive notifications about the progress of the Local Plan, including future consultation updates, submission of the Plan for examination and adoption of the Plan?

☑ Yes ☐ No

If you have selected yes, notifications will be sent via email where an email address has been provided.