

Swindon Borough Council

Sequential and Exception Test Statement Interim Draft Report

**Regulation 18 – Draft Local Plan Consultation
August 2025**

Swindon Borough Council
Published: September 2025

All rights reserved. No part of this document may be produced or transmitted in any form or by any means including photocopying or electronic or other recording without the written permission of the copyright holder.

© SWINDON BOROUGH COUNCIL, 2025



1. Introduction

- 1.1 Swindon Borough Council is in the process of preparing a new Local Plan to 2043, which will replace the current Local Plan 2026. This report presents the approach and findings of the initial Sequential Test and, where necessary, the Exception Test, that guided the proposed site allocations and spatial strategy set out in the Draft New Local Plan. It forms part of the evidence base for the Regulation 18 consultation, and demonstrates the approach that has been taken to date, to demonstrate Local Planning Authority's compliance with national planning policy in relation to flood risk. It must be made clear at the outset of this report that the Council has commissioned Level 1 of the SFRA to inform the plan making. The Council is currently presenting a first Regulation 18 consultation on the draft Local Plan. It is anticipated that as a result of the consultation, further information and evidence may be made available which the Council will need to consider in relation to the proposed site allocations. The Level 1 SFRA will be used to guide refinement of site allocations, and a Level 2 SFRA will be commissioned to provide full detail to aid in the finalisation of the sequential test and, if necessary, exception test, to support the Regulation 19 consultation. At this early stage, the sequential test has been undertaken in a proportionate manner with reference to indicative information, and potential routes to mitigate any identified risk. This will be further refined in the coming stages of plan preparation, drawing on representations to the Regulation 18, consultation with the Environment Agency, and further evidence commissioned.
- 1.2 This interim draft report should be read with the context explained in para 1.1 in mind. This document should also be read in conjunction with the Council's Strategic Flood Risk Assessment (SFRA) Level 1, 2025, Sustainability Appraisal (SA), and Draft New Local Plan (Regulation 18), and Swindon's Strategic Housing and Employment Land Availability Assessment 2025 (SHEELA) and SHELA Annex 1, which together provide the strategic and technical context for this assessment
- 1.3 In accordance with the National Planning Policy Framework (NPPF, 2024) and associated Planning Practice Guidance (PPG), Local Plans are required to steer new development to areas with the lowest probability of flooding. This process is undertaken through the application of a sequential, risk-based approach when allocating land for development. Where it is not possible to locate development in areas of lower flood risk, the Exception Test must also be applied to demonstrate that the wider sustainability benefits of the development outweigh the flood risk, and that the development will be safe for its lifetime without increasing risk elsewhere.

2. Purpose of the Sequential and Exception Tests

- 2.1 This Interim Sequential Test Statement has been prepared to support the emerging Local Plan at the Regulation 18 stage. It demonstrates how potential development sites identified through the Strategic Housing and Employment Land Availability Assessment (SHELAA) have been assessed for suitability with regard to flood risk, and how the sites proposed for allocation have followed the requirements of national planning policy specifically the National Planning Policy Framework (NPPF) and associated Planning Practice Guidance (PPG), ensuring that the Local Plan directs growth to the most sustainable and appropriate locations. It provides an evidence-based account of how site allocations proposed in the Swindon Local Plan 2023-2043 have been assessed against flood risk considerations.
- 2.2 The Sequential Test aims to steer new development away from areas at highest flood risk and towards locations in lower-risk zones, where reasonably available and appropriate alternatives exist. Where development cannot be located in lower risk areas, the Exception Test is applied to confirm that sites bring wider sustainability benefits which outweigh flood risk, and that development will remain safe throughout its lifetime without increasing flood risk elsewhere.
- 2.3 This Statement draws upon the evidence base established by the Strategic Flood Risk Assessment (SFRA) conducted at Level 1. The Level 1 SFRA provides a boroughwide overview of flood risk and informs the spatial strategy underpinning the Local Plan. It identifies zones where development should be avoided or carefully managed.
- 2.4 The Council is holding its first Regulation 18 consultation on the New Local Plan 2042 in September 2025 for six weeks. This consultation will allow for engagement on proposed sites and also provide opportunity for new sites to be submitted, and the Council is inviting further site submissions during this time. As a result, changes to the proposed allocations may be made between Regulation 18 and Regulation 19 consultation periods.
- 2.5 The Level 2 SFRA will therefore be undertaken following the Regulation 18 consultation, once the Council is confident that every opportunity to submit sites for consideration has been made, and the preferred options on site allocations are made. The Level 2 stage of the assessment will provide site-specific analysis of proposed allocations, enabling systematic application of the Sequential Test, where necessary, the Exception Test through site-by-site risk assessment and screening, and help to require the master planning of the development to the areas of the site which have the least flood risk.
- 2.6 The purpose of this report is to:
- Provide evidence to the Regulation 18 stage of plan to inform engagement and plan refinement
 - Demonstrate that the Local Plan's spatial strategy and site allocations have been informed by a sequential approach to flood risk, in line with the Sequential Test;

- Identify where development is proposed in areas at risk of flooding and indicate how the requirements of the Exception Test can be demonstrated, where applicable;
- Provide transparency on how flood risk has been considered in the site selection process;

3. Background and Policy Context

National Policy

- 3.1 National Planning Policy Framework (**NPPF, 2024**) requires that inappropriate development in areas at risk of flooding should be avoided by directing development away from such areas. The **Sequential Test** is the primary mechanism for achieving this, applied first at the plan-making stage. The **Exception Test** may be applied only if, following the Sequential Test, it is not possible to accommodate development elsewhere.

- 3.2 Paragraph 162 states that:

162. Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating and drought from rising temperatures⁶¹. Policies should support appropriate measures to ensure the future health and resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.

- 3.3 The NPPF section of Planning and Flood Risk states that:

170. Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.

171. Strategic policies should be informed by a strategic flood risk assessment, and should manage flood risk from all sources. They should consider cumulative impacts in, or affecting, local areas susceptible to flooding, and take account of advice from the Environment Agency and other relevant flood risk management authorities, such as lead local flood authorities and internal drainage boards.

172. All plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property. They should do this, and manage any residual risk, by:

- applying the sequential test and then, if necessary, the exception test as set out below;
- safeguarding land from development that is required, or likely to be required, for current or future flood management;
- using opportunities provided by new development and improvements in green and other infrastructure to reduce the causes and impacts of flooding, (making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management); and
- where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to relocate development, including housing, to more sustainable locations.

173. A sequential risk-based approach should also be taken to individual applications in areas known to be at risk now or in future from any form of flooding, by following the steps set out below.

*174. Within this context the aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. **Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test.***

175. The sequential test should be used in areas known to be at risk now or in the future from any form of flooding, except in situations where a site-specific flood risk assessment demonstrates that no built development within the site boundary, including access or escape routes, land raising or other potentially vulnerable elements, would be located on an area that would be at risk of flooding from any source, now and in the future (having regard to potential changes in flood risk).

.

Table 1: Copy of NPPF Annex 3: Flood risk vulnerability classification

(Information on flood risk vulnerability classification)

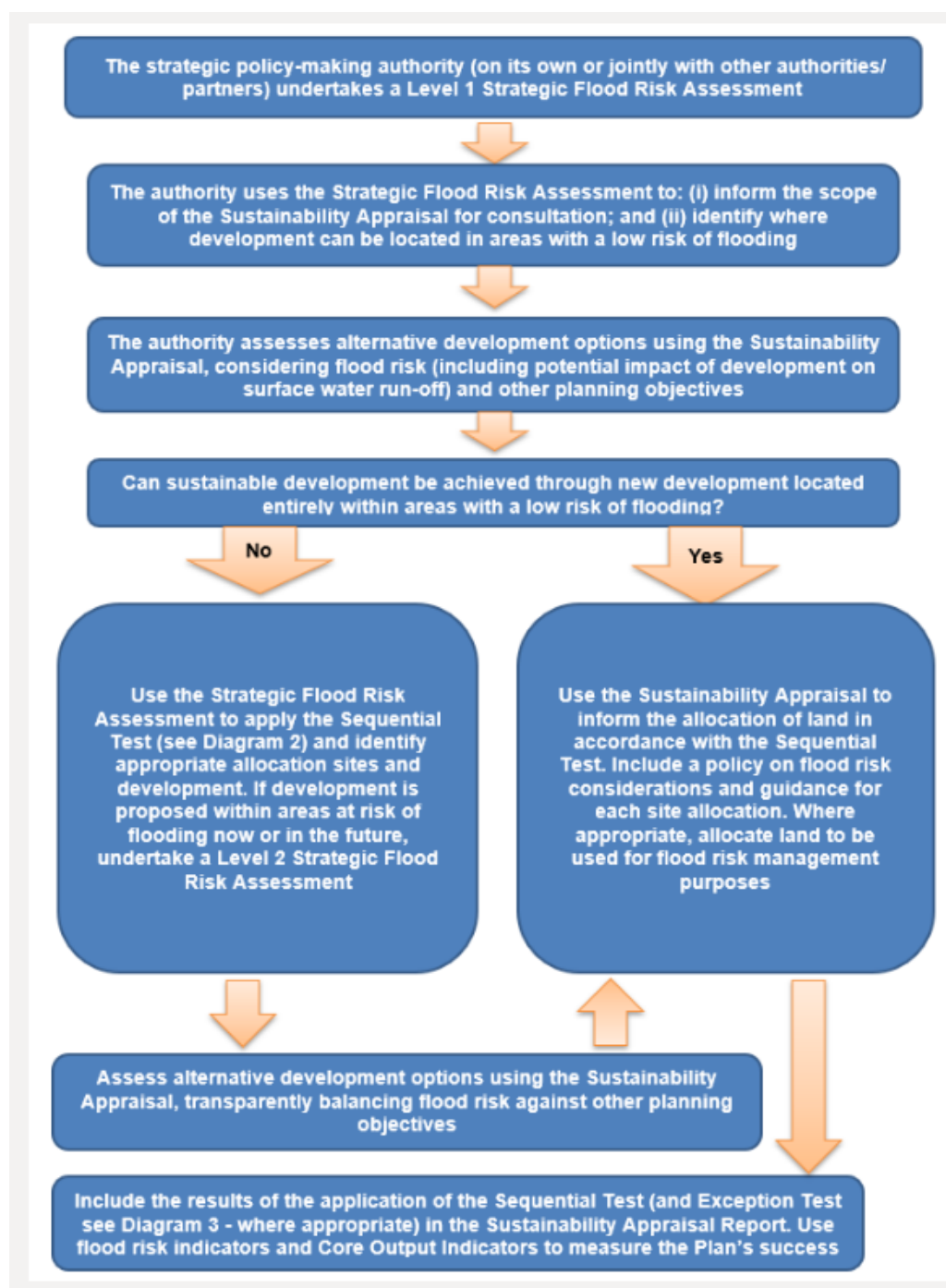
<p><u>Essential infrastructure</u></p>	<ul style="list-style-type: none"> • Essential transport infrastructure (including mass evacuation routes) which has to cross the area at risk. • Essential utility infrastructure which has to be located in a flood risk area for operational reasons, including infrastructure for electricity supply including generation, storage and distribution systems; including electricity generating power stations, grid and primary substations storage; and water treatment works that need to remain operational in times of flood. • Wind turbines. • Solar farms.
<p><u>Highly vulnerable</u></p>	<ul style="list-style-type: none"> • Police and ambulance stations; fire stations and command centres; telecommunications installations required to be operational during flooding. • Emergency dispersal points. • Basement dwellings. • Caravans, mobile homes and park homes intended for permanent residential use. • Installations requiring hazardous substances consent. (Where there is a demonstrable need to locate such installations for bulk storage of materials with port or other similar facilities, or such installations with energy infrastructure or carbon capture and storage installations, that require coastal or water-side locations, or need to be located in other high flood risk areas, in these instances the facilities should be classified as 'Essential Infrastructure'.)
<p><u>More vulnerable</u></p>	<ul style="list-style-type: none"> • Hospitals • Residential institutions such as residential care homes, children's homes, social services homes, prisons and hostels. • Buildings used for dwelling houses, student halls of residence, drinking establishments, nightclubs and hotels. • Non-residential uses for health services, nurseries and educational establishments.

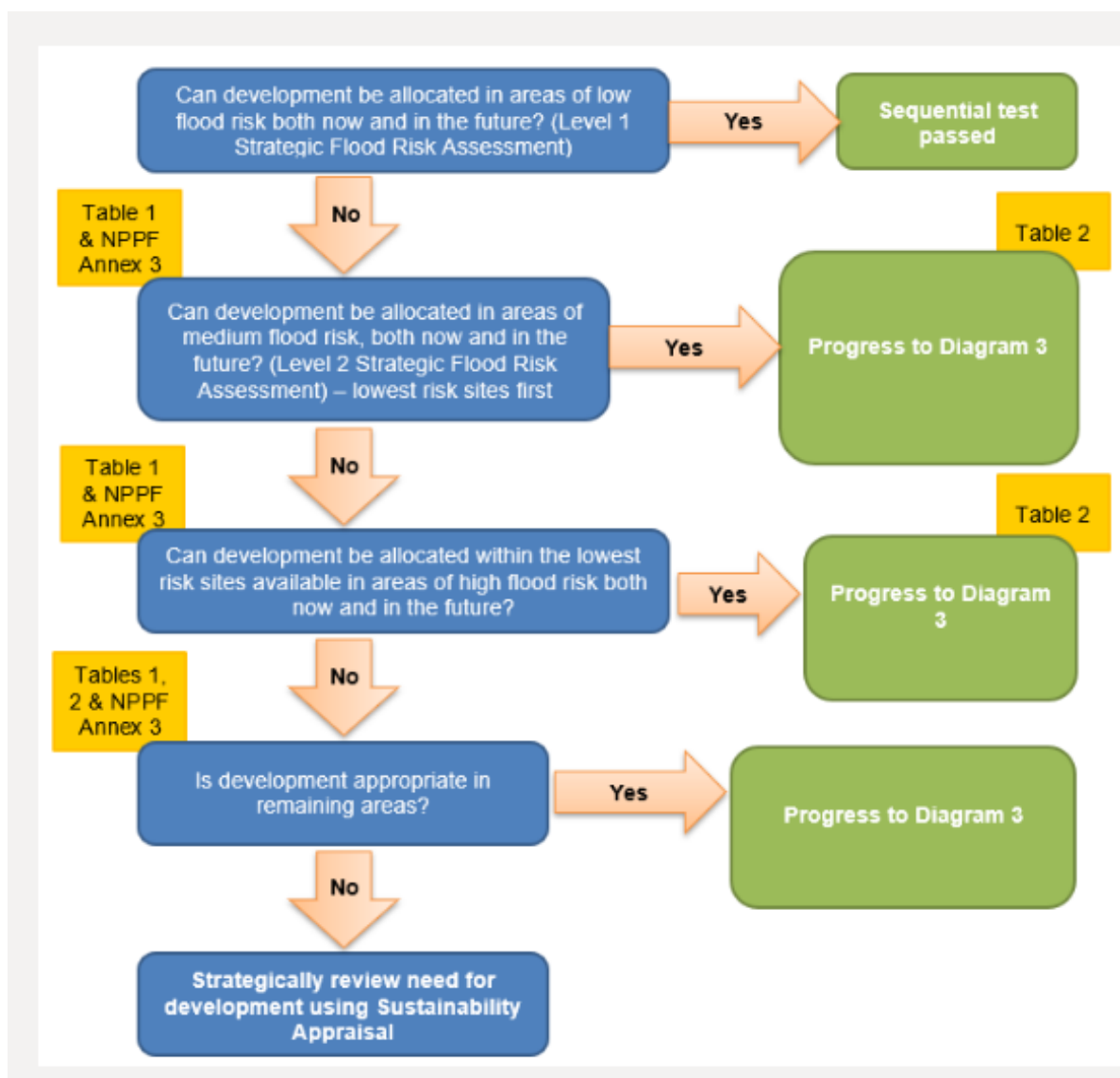
	<ul style="list-style-type: none"> • Landfill* and sites used for waste management facilities for hazardous waste. • Sites used for holiday or short-let caravans and camping, subject to a specific warning and evacuation plan.
<u>Less vulnerable</u>	<ul style="list-style-type: none"> • Police, ambulance and fire stations which are not required to be operational during flooding. • Buildings used for shops; financial, professional and other services; restaurants, cafes and hot food takeaways; offices; general industry, storage and distribution; non-residential institutions not included in the 'more vulnerable' class; and assembly and leisure. • Land and buildings used for agriculture and forestry. • Waste treatment (except landfill* and hazardous waste facilities). • Minerals working and processing (except for sand and gravel working). • Water treatment works which do not need to remain operational during times of flood. • Sewage treatment works, if adequate measures to control pollution and manage sewage during flooding events are in place. • Car parks.
<u>Water-compatible development</u>	<ul style="list-style-type: none"> • Flood control infrastructure. • Water transmission infrastructure and pumping stations. • Sewage transmission infrastructure and pumping stations. • Sand and gravel working. • Docks, marinas and wharves. • Navigation facilities. • Ministry of Defence installations. • Ship building, repairing and dismantling, dockside fish processing and refrigeration and compatible activities requiring a waterside location. • Water-based recreation (excluding sleeping accommodation). • Lifeguard and coastguard stations. • Amenity open space, nature conservation and biodiversity, outdoor sports and recreation and essential facilities such as changing rooms.

	<ul style="list-style-type: none">• Essential ancillary sleeping or residential accommodation for staff required by uses in this category, subject to a specific warning and evacuation plan.
--	---

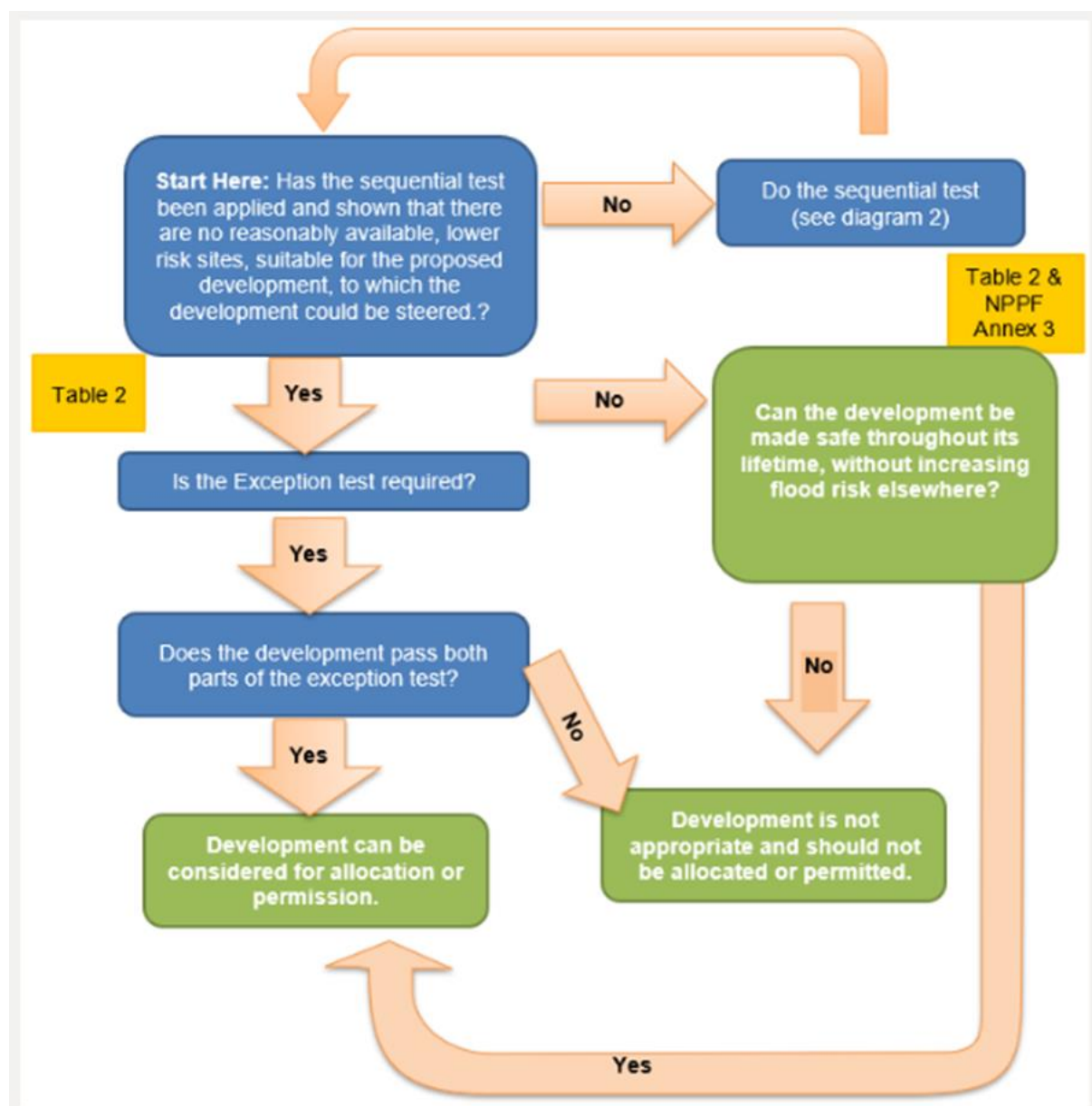
Planning Practise Guidance

- 3.4 The relevant guidance is provided in the Planning Practice Guidance (PPG) on Flood Risk and Coastal Change, which states that local authorities should use their SFRA to apply the sequential approach when developing Local Plans and assessing development allocations.
- 3.5 Copy of Diagram 1 (PPG Planning Practice Guidance - Flood Risk and Coastal Change)





Copy of Diagram 3: (PPG Planning Practice Guidance (PPG) on Flood Risk and Coastal Change



4. Local Policy

- 4.1 Swindon Borough Council is in the process of preparing a new Local Plan to 2043, which will replace the current Local Plan 2026. Water Management Studies namely the Strategic Flood Risk Assessment (SFRA) Level 1 and Water Cycle Study (WCS) scoping study have been commissioned as evidence base documents to ensure that housing growth plans are based on sound water service and environmental evidence, and that growth will be supported by sustainable water service infrastructure without impacting on environmental objectives.
- 4.2 The growth that the New Local Plan 2043 is required to deliver is identified by the Government's standard methodology establishes an Local Housing Need figure of 1,205 dwellings per annum (dpa), or 24,100 homes over the plan period. The Regulation 18 draft Local Plan proposes 25,822 homes (LHN + 7%) .
- 4.3 The strategic site allocations contained in the adopted Local Plan 2026; New Eastern Villages (NEV) (8500 dwellings), Wichelstowe (3300 dwellings) and Kingsdown (1700 dwellings) are at various stages of content and delivery, and they are proposed to 'roll over' to the New Local Plan. The reasons for this approach are detailed in the Regulation 18 draft Local Plan, and in the supporting Sustainability Appraisal. The remainder to deliver on these strategic allocations contributes around half of the housing requirement over the plan period. In combination with other existing pipeline consents due to be delivered during the plan period, there is a remaining need to allocate 7000 new homes through the New Local Plan.
- 4.4 The Swindon Local Plan 2023-2043 proposes overall higher quantum of growth than that the standard method. The Regulation 18 draft Local Plan proposes 25,822 homes (LHN + 7%) with the anticipation that the Regulation 18 consultation may bring forward new information on sites, or reveal additional constraints, and potentially alter the plans allocations. The option of applying a buffer also may help mitigate 'delivery risk' as explained in the Sustainability Appraisal.
- 4.5 The focus of this report is on the site selection process, with reference to the spatial strategy approach and the application of the sequential test.

5. Strategic Flood Risk Assessment (Level 1, 2025)

- 5.1 The Council commissioned the consultants Stantec to undertake a Level 1 SFRA to replace the previous Level 1 SFRA (May 2019). It was developed to assist the Council in its selection of sites to steer development away from vulnerable flood risk areas. This has been used to inform the preparation of the new Local Plan. It is an evidence document that feeds into and run alongside the iterative process of producing the Sustainability Appraisal of the Local Plan (see below figure 2). The SFRA level 1 then is used to apply the Sequential Test to future site allocations.
- 5.2 As part of the Level 1 SFRA, the Environment Agency (EA) hydraulic models have been run, where applicable, to generate flood extents which scope in potential climate change impacts and to ensure that the most up-to-date flood extents are available. Flood risk from all sources is presented with a with a High, Medium or Low flood risk value.

Table 1: Main Sources of Flood Risk assessed in the SFRA

Flood Type	Source
Fluvial	River Thames, River Ray, River Cole, Haydon Wick Brook, Lydiard Brook and others, and ordinary watercourses
Surface water (pluvial)	Urban runoff Greenfield runoff
Tidal	Not applicable due to geographical location
Groundwater	Rising groundwater level
Flooding from Sewers	System exceeding capacity or burst water main
Artificial Sources	Reservoirs

Fluvial

- 5.3 Under the Level 1 SFRA, all sources of flood risk have been considered as set out in table XX below. The report finds that fluvial flood risk is associated with the proximity of the River Ray, River Cole and the River Thames and their tributaries to the Borough.

Surface water flood risk

- 5.4 The risk of surface water flooding is intensified in some areas of the Borough due to outward urban growth which has caused the culverting of some watercourses. Trash screens and culverts can become blocked up as a result of plant debris and rubbish which can cause water to exceed its banks.

Groundwater caveat

- 5.5 Groundwater flood risk was generally found to be low, through the SFRA L1 flood mapping shows that this low risk present across a significant proportion of the borough particularly to the north and south, associated with the geology of the borough. It must be understood that these are strategic level datasets and indicate areas that are theoretically susceptible for flooding. However, the SFRA L1 caveats that the British Geological Society makes clear that groundwater flood risk mapping should only be used for a desk based high level assessment of groundwater susceptibility, and does not reflect any detailed modelling of flood risk from this source – “the susceptibility data should not be used on its own to make planning decisions at any scale, and, in particular, should not be used to inform planning decisions at the site scale. The susceptibility data cannot be used on its own to indicate risk of groundwater flooding” – as such, since there is no nationally

standardised method to assess groundwater, the actual risk should be considered on a site by site basis via site-specific assessment and intrusive investigations. (Paragraph 3.7.3). It is therefore considered that proposed site allocations that are indicated as potentially affected by risk of groundwater flooding would be explored further at the SFRA Level 2 stage on a site specific level. This would be initially guided by indicators that actual flood risk could be relevant, for instance by the presence of flooding data from other sources (e.g. historic flooding records).

- 5.6 Paragraph 6.5.6 SFRA L1 goes on to advise that: suitable waterproof sealing of any low level/basement areas (appropriate drainage and/or the raising of entry thresholds to consider the impact that raised groundwater levels may have upon the operation of SuDS during periods of heavy rainfall

Artificial sources of flooding from reservoirs

- 5.7 not applicable to Swindon Borough

Tidal sources of flooding

- 5.8 not applicable to Swindon Borough

Sewer flooding record caveat:

- 5.9 Details of the DG5 Register for the Swindon area were provided by Thames Water for inclusion within the SFRA. The register does not provide a specific location of flooding incidents; rather it provides a total number of flooding incidents over the past ten-year period for a particular postcode prefix area (e.g. SN1 2). The Flood Risk mapping therefore shows a significant proportion of the borough affected due to the postcode distribution. This is more pronounced in the rural areas through is also relevant across areas in the town.

Flood Zone definitions

- 5.10 The probability of flooding from rivers and the sea is assessed through categorising areas into Flood Zones of low, medium and high probability, as defined in Table 1 of the PPG 'Flood risk and coastal change' and presented on the Flood Map for Planning

Table 2: Flood Zone Definitions	
Flood zone	Definition
Zone 1 Low probability	Land having a less than 0.1% annual probability of river or sea flooding. (Shown as 'clear' on the Flood Map for Planning – all land outside Zones 2, 3a and 3b)
Zone 2 Medium probability	Land having between a 1% and 0.1% annual probability of river flooding; or land having between a 0.5% and 0.1% annual probability of sea flooding. (Land shown in light blue on the Flood Map)
Zone 3a High probability	Land having a 1% or greater annual probability of river flooding; or Land having a 0.5% or greater annual probability of sea. (Land shown in dark blue on the Flood Map)
Zone 3b The	This zone comprises land where water from rivers or the sea has to flow or be stored in times of flood. The identification of functional floodplain should take account of local circumstances and not be

Functional Floodplain	<p>defined solely on rigid probability parameters. Functional floodplain will normally comprise:</p> <ul style="list-style-type: none"> land having a 3.3% or greater annual probability of flooding, with any existing flood risk management infrastructure operating effectively; or <p>land that is designed to flood (such as a flood attenuation scheme), even if it would only flood in more extreme events (such as 0.1% annual probability of flooding).</p> <p>Local planning authorities should identify in their Strategic Flood Risk Assessments areas of functional floodplain and its boundaries accordingly, in agreement with the Environment Agency. (Not separately distinguished from Zone 3a on the Flood Map)</p>
-----------------------	---

Flood Risk Vulnerability

5.11 Paragraph 177 of The NPPF (2024) notes that once the sequential test has been applied, if it is not possible for development to be located in areas with lower risk of flooding (while also considering wider sustainable development objectives), the exception test may have to be applied. The need for an exception test will depend on the potential vulnerability of the site, as set out in the Flood Risk Vulnerability Classification in Annex 3 of the NPPF (2024). This classification is as follows:

- Highly vulnerable: development in Flood Zone 2.
- More vulnerable: development in Flood Zone 3a.
- Essential infrastructure: in Flood Zone 3a or 3b

Table 3: NPPF Annex 3: Flood risk vulnerability classification (Information on flood risk vulnerability classification)	
<u>Essential infrastructure</u>	<ul style="list-style-type: none"> • Essential transport infrastructure (including mass evacuation routes) which has to cross the area at risk. • Essential utility infrastructure which has to be located in a flood risk area for operational reasons, including infrastructure for electricity supply including generation, storage and distribution systems; including electricity generating power stations, grid and primary substations storage; and water treatment works that need to remain operational in times of flood. • Wind turbines. • Solar farms.
<u>Highly vulnerable</u>	<ul style="list-style-type: none"> • Police and ambulance stations; fire stations and command centres; telecommunications installations required to be operational during flooding. • Emergency dispersal points. • Basement dwellings. • Caravans, mobile homes and park homes intended for permanent residential use. • Installations requiring hazardous substances consent. (Where there is a demonstrable need to locate such installations for bulk storage of materials with port or other similar facilities, or such installations with energy infrastructure or carbon capture and storage installations, that require coastal or water-side locations, or need to be located in other high flood risk areas, in these instances the facilities should be classified as 'Essential Infrastructure'.)
<u>More vulnerable</u>	<ul style="list-style-type: none"> • Hospitals • Residential institutions such as residential care homes, children's homes, social services homes, prisons and hostels. • Buildings used for dwelling houses, student halls of residence, drinking establishments, nightclubs and hotels. • Non-residential uses for health services, nurseries and educational establishments.

	<ul style="list-style-type: none"> • Landfill* and sites used for waste management facilities for hazardous waste. • Sites used for holiday or short-let caravans and camping, subject to a specific warning and evacuation plan.
<u>Less vulnerable</u>	<ul style="list-style-type: none"> • Police, ambulance and fire stations which are not required to be operational during flooding. • Buildings used for shops; financial, professional and other services; restaurants, cafes and hot food takeaways; offices; general industry, storage and distribution; non-residential institutions not included in the 'more vulnerable' class; and assembly and leisure. • Land and buildings used for agriculture and forestry. • Waste treatment (except landfill* and hazardous waste facilities). • Minerals working and processing (except for sand and gravel working). • Water treatment works which do not need to remain operational during times of flood. • Sewage treatment works, if adequate measures to control pollution and manage sewage during flooding events are in place. • Car parks.
<u>Water-compatible development</u>	<ul style="list-style-type: none"> • Flood control infrastructure. • Water transmission infrastructure and pumping stations. • Sewage transmission infrastructure and pumping stations. • Sand and gravel working. • Docks, marinas and wharves. • Navigation facilities. • Ministry of Defence installations. • Ship building, repairing and dismantling, dockside fish processing and refrigeration and compatible activities requiring a waterside location. • Water-based recreation (excluding sleeping accommodation). • Lifeguard and coastguard stations. • Amenity open space, nature conservation and biodiversity, outdoor sports and recreation and essential facilities such as changing rooms.

	<ul style="list-style-type: none"> Essential ancillary sleeping or residential accommodation for staff required by uses in this category, subject to a specific warning and evacuation plan.
--	---

5.12 This classification is also presented in Table 2 of PPG 'Flood risk and coastal change' shown below

Table 4: Flood risk vulnerability and flood zone 'incompatibility'					
	Flood Risk Vulnerability Classification				
	Essential infrastructure	Highly vulnerable	More vulnerable	Less vulnerable	Water compatible
Zone 1	✓	✓	✓	✓	✓
Zone 2	✓	Exception Test required	✓	✓	✓
Zone 3a ±	Exception Test required±	✗	Exception Test required	✓	✓
Zone 3b*	Exception Test required*	✗	✗	✗	✓*
Key:	✗ Development should not be permitted ✓ Exception Test required				

6. The SHEELA

6.1 Over the past a few years, multiple sites have been promoted to the Council for consideration, typically by landowners and land agents through formal 'call-for-sites'. The last call-for-sites was held in 2023 and greatly informed the development of the plan. Internal work streams on an Urban Capacity Study revealed the extent of potential sites within the urban area of Swindon, to provide site options that could deliver on the Council's regeneration agenda, and move away from a pattern of further greenfield development and outward expansion.

6.2 The SHEELA process follows an assessment of planning constraints at a high-level. The council's SHEELA 2025 reports on the process and findings, and is not repeated in detail here. In summary the criteria employed when giving consideration to development suitability, in addition to standard distance/intersect analysis using GIS for flood zone, qualitative appraisal workstreams were also employed focusing on historic environment, landscape and biodiversity constraints.

6.3 The flood risk associated with each SHEELA site was assessed using the Flood risk maps for planning (EA), and the draft SFRA Level 1 findings, primarily against intersection with Flood Zones 2 and 3. An extract of the flood risk assessment criteria

is presented below in Table 5. Sites did not pass the initial assessment stage if they were located entirely within Flood Zone 2 or 3. Many sites had an element of Flood Zone 2 or 3 that was present in the site but would not necessarily prevent development across the site (i.e. a low percentage of the site was affected). In this scenario, sites were able to progress for further consideration. Through this process, the list of sites submitted in the SLAA were considered through an initial screening exercise to assess flood risk at these sites.

Table 5: Flooding Constraint Relevant to Swindon Borough

Flooding Constraint	Relevant to Swindon Borough	Initial survey site rejection threshold
Flood Zone 2	Relevant. Particularly along the Rivers Thames, River Cole, Dorcan Stream, River Ray.	A site entirely located in Flood Zone 2 is clearly unsuitable for residential or economic development.
Flood Zone 3	Relevant. Particularly along the Rivers Thames, River Cole, Dorcan Stream, River Ray.	A site entirely located in Flood Zone 3 is clearly unsuitable for residential or economic development.

7. The Sustainability Appraisal objectives and the spatial strategy

- 7.1 The emerging Local Plan seeks to deliver the ‘Heart of Swindon’ ambition to revitalize Town Centre with the focus to encourage investment and increase the footfall through urban focused spatial strategy. The Plan proposes sustainable growth corridors through a focus on Town Centre and wider Urban Area housing delivery. The remaining half of the housing requirement is planned within the sustainable corridors including Central Area (4,300 dwellings), with 2,100 dwellings in Swindon Urban Area and a thousand dwellings each are in the Highworth, Blunsdon and Rural North and the Wroughton and Rural South areas, predominantly at Wroughton and land north of Tadpole Garden Village.
- 7.2 The Government introduced the requirement that Local Plans must be underpinned by a vision led approach to transport issues, which should be considered from the earliest stages of plan-making and development proposals (NPPF 2024 Chapter 9). This has required a spatial strategy which is underpinned by new thinking about smarter growth and linking development to existing and new sustainable transport corridors and hubs.
- 7.3 The spatial strategy for the new Local Plan considers the status of the build out of the strategic sites allocated in the Local Plan 2026. The strategic allocations that remain to be delivered in full, (Wichelstowe, the New Eastern Villages, and Kingsdown) are at various stages of content and delivery, and they are proposed to ‘roll over’ to the New Local Plan, contributing around half of the housing requirement over the plan period. In combination with other existing pipeline

consents due to be delivered during the plan period, there is a remaining need to identify 7000 new homes for allocation in the New Local Plan.

- 7.4 An initial high level assessment through the SHELAA identified sites that would be discounted from further consideration due to the presence of significant constraints. This assessment included if the site was located entirely within flood zone 2 or 3. Sites containing an element of Flood Zone 2 or 3, but had the potential to yield developable areas in Flood Zone 1 through site master planning were included for the next stage of assessment. The NPPF (paragraph 174) advises that 'development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding'. That consideration of reasonably alternative sites is fully considered in the SA report, which explains how the Local Plan's spatial strategy options and reasonable alternatives were considered. The SA is an iterative process, and developed alongside the emerging drafts of the SFRA Level 1.
- 7.5 The SA sets out (5.3.8) that the outcome of the SLAA is that: 'many site options are ruled out as not developable; others are developable in SLAA terms but perform relatively poorly such that there is no realistic potential for allocation given the combined capacity of preferable sites; and the remaining sites warrant further consideration. Many of the SHELAA sites are located away from facilities and services (current and future), and would therefore not be in accordance with the principles of sustainable development.'
- 7.6 The Sustainability Appraisal evaluates the reasonable alternatives to the proposed spatial strategy, and the corresponding sites which could be considered as reasonable alternatives to the individual site allocations. This approach is fully set out in the SA report, and not repeated here. The conclusions of the growth options are relevant to the application of the sequential test as they help to define what sites that are alternative to the allocations proposed could be considered in the sequential assessment of lowest flood risk. The overall conclusions of the SA are set out as alternative options for strategic areas, or directions for growth.
- 7.7 Scenario 1 is the proposed plan. It assesses supply totalling 25,822 homes (LHN + 7%) comprising:
- 13,699 homes from completions and commitments
 - 4,317 homes in Swindon town centre
 - 2,112 homes across the wider urban area
 - 513 homes at the northern urban edge
 - 515 homes at the northeast urban edge
 - 2,022 at the eastern urban edge
 - 1,620 homes at the southern urban edge
 - 1,031 homes at Wroughton

- 53 homes at Highworth

- 7.8 Scenario 2 is (1) plus additional growth north of Swindon, and specifically west of Tadpole GV / NW of Blundon St Andrews, leading to 26,322 homes
- 7.9 Scenario 3 is (1) plus additional growth at Highworth leading to 26,419 homes. Here there are no further assumptions made regarding distribution or sites
- 7.10 The reasonable alternatives to the site allocations proposed in the SA therefore all propose additional sites. For sequential test purposes, this identification of reasonable alternatives via the SA process does not provide an opportunity to sequentially select a different SHELAA site for allocation, it would only create additional allocated sites.

8. Regulation 18 – Interim Sequential Test Approach

- 8.1 The purpose of the Sequential Test is to ensure that a sequential, risk-based approach is followed to assess the location of sites for new development and to steer new development to areas with the lowest risk of flooding. All sources of flood risk and future flood risk from climate change must be taken into account.
- 8.2 *offsite impacts to be taken into account when considering if flood risk would be increased elsewhere, specifically in relation to possible impacts upon essential infrastructure*
- 8.3 A Sequential Test is therefore vital for the Council to assess the sites proposed in the SLAA as part of the Regulation 18 stage of the new Local Plan 2043.
- 8.4 It is important to reiterate that that there are nearly xxx sites in the 2023 SHELAA. The NPPF (paragraph 168) advises that ‘development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding’. Many of these SHELAA sites are located away from well serviced settlement, and would therefore not align with the proposed sustainable development strategy. As such, many SHELAA sites would not be ‘appropriate and, based on NPPF advice, need not be considered as part of the sequential test. It is considered disproportionate to assess the SHELAA sites sequentially for their performance in terms of flood risk, because not every site in the SHELAA is a reasonable alternative.
- 8.5 Housing Needs Alignment: Once accounting for developments in the pipeline, and the delivery remainder of existing strategic sites, the number of homes that the city council are required to provide is around 7000 homes. The Council administration has an agenda and mandate to prioritise the regeneration the heart of Swindon to meet a range of social, economic and environmental objectives. Therefore, it was logical to concentrate on sites that best align with the proposed development strategy. At this stage the sequential and exception test is an interim demonstration of how the proposed spatial strategy could meet the flood risk requirements set by the NPPF. The Council is at Regulation 18, and the proposals are at this stage of plan

making, subject to change. The Sustainability Appraisal considers alternative development strategies:

- 8.6 Focused on High-Priority sites: This Sequential statement sets out the findings from the Level 1 SFRA for the proposed site allocation. The reasons that other sites were not selected for allocation is set out in the SHELAA and the SA. Following the Regulation 18 consultation, it is anticipated that further information and evidence will become available on sites and any reasonable alternatives will be reassessed in light of consultation representations. As the Council is in a position to move toward a set of preferred options for site allocations (to underpin the Regulation 19 consultation) work will be commissioned on the SFRA Level 2. This will allow for the effective spend of resources on exploring a thorough and detailed assessment of flooding from all sources, along with any flood risk mitigation measures. Consultation with the EA will closely inform these next steps.

9. The Sequential Test

- 9.1 For the purposes of this site sequential statement, the site allocations that were included in the Regulation 18 Local Plan have been grouped into the following categories.
1. Risk of Flooding from Rivers
 2. Risk of flooding from sources other than Rivers; surface water, groundwater
 3. Whether there are other indicators of flood risk. If there are other indicators of flood risk, this would indicate that investigations would be made to determine if a site is at a higher risk of flooding from the sources identified above.
 - Impacted by Historic Flooding
 - Within 20 Meters Unmodelled Watercourse
 - More than 10 Sewer Flooding Records in Postcode Area

10. Flood Zone 1

- 10.1 This section details the proposed allocations with Low Risk of flooding from other sources. Additional proformas for these sites flood zone 1 sites are set out in **Appendix 1**. Secondly, SHELAA references for sites that were not taken forward for allocation are presented. The sequential test report should be read in conjunction with the SHELAA report for reasons that the site was not selected, and the SA report for the reasons that these sites did not form a reasonable alternative option.
- 10.2 Sites assessed in the SHELAA and located in Flood Zone 1 which were not selected for allocation at this stage have been assessed through the SHELAA for their suitability against a range of constraints and suitability criteria. This allowed inappropriate sites to be filtered out that were either judged to be too constrained/undeliverable or did not meet the spatial strategy.
- 10.3 The SHELAA report sets out a summary of the reasons that sites in Flood Zone one not found to be suitable.

No/ very low risk of flooding from sources other than rivers and no other indicators of flood risk:

- 10.4 The SFRA Level 1 identified that of all SHELAA sites assessed, only 5 sites had no/very low risk of flooding from any source, including other sources of flood risk information. Two sites are proposed as allocations. These sites therefore passed the sequential test:

- | |
|--|
| • 18-006 (UCS.0625) Queens Street Car Park |
| • 18-009 (UCS.0960) Spring Gardens Carpark |

- 10.5 SHELAA sites in this category that were not taken forward. The sequential test report should be read in conjunction with the SHELAA report for reasons that the site was not selected, and the SA report for the reasons that these sites did not form a reasonable alternative option,

s0485	s0533	s0534
-------	-------	-------

Low risk of flooding from sources other than rivers **and no other** indicators of flood risk:

- 10.6 Flood Zone 1 with low risk of flooding from sources other than rivers and no other indicators of flood risk:

Allocation	SHEELA	Risk of Flooding from Surface Water			Susceptibility of Groundwater Flooding			Other * More than 10 Sewer Flooding Records in Postcode Area		
	ID	Low	Med	High	Low	Med	High	Impacted by Historic Flooding	Within 20 Meters Unmodelled Watercourse	Sewer Flooding Records*
18-015	s0536	N	N	N	Y	N	N	N	N	N
18-016	s0375	Y	N	N	Y	N	N	N	N	N
18-017	s0380	N	N	N	Y	N	N	N	N	N
18-029	s0050b	N	N	N	Y	N	N	N	N	N
18-035	UCS.0034	N	N	N	Y	N	N	N	N	N
18-038	s0107	Y	N	N	Y	N	N	N	N	N
18-038	s0107b	Y	N	N	Y	N	N	N	N	N

10.7 SHELA sites in this category that were not taken forward. The sequential test report should be read in conjunction with the SHELA report for reasons that the site was not selected, and the SA report for the reasons that these sites did not form a reasonable alternative option,

s0019	s0033b	s0056	s0374c	s0529b	s0023	s0374	s0517	s0051
s0019b	s0047	s0245	s0515	s0562	s0033	s0374b	s0524	

Low risk of flooding from sources other than rivers **with other** indicators of flood risk

10.8 Flood Zone 1 with Low risk of flooding from sources other than rivers with other indicators of flood risk

- No allocations proposed

- 10.9 SHELAA sites in this category that were not taken forward. The sequential test report should be read in conjunction with the SHELAA report for reasons that the site was not selected, and the SA report for the reasons that these sites did not form a reasonable alternative option,

s0012	s0057	s0301	s0432	s0463	s0484	s0021	s0063	s0419	s0457	s0481	s0502b
s0013	s0058	s0368	s0454	s0464	s0502	s0040	s0293	s0419b	s0458	s0482	s0505

Medium Risk of flooding from sources other than rivers, and **no other** indicators of flood risk:

- 10.10 Flood Zone 1 with Medium Risk of flooding from sources other than rivers, and no other indicators of flood risk:

Allocation ref	SHEELA ref	Risk of Flooding from Surface Water			Susceptibility of Groundwater Flooding			Other * More than 10 Sewer Flooding Records in Postcode Area		
	ID	Low	Med	High	Low	Med	High	Low	Med	High*
18-008	s0519	N	N	N	Y	Y	N	N	N	N
18-002	S0480	Y	Y	N	N	Y	N	N	N	Y
18-002	S0480b	N	Y	N	N	Y	N	N	N	Y

- 10.1 SHELAA sites in this category that were not taken forward. The sequential test report should be read in conjunction with the SHELAA report for reasons that the site was not selected, and the SA report for the reasons that these sites did not form a reasonable alternative option,

s0010	s0425	s0511	s0068	s0492	s0545	s0559
-------	-------	-------	-------	-------	-------	-------

Medium Risk of flooding from sources other than rivers, with other indicators of flood risk

- 10.2 Medium Risk of flooding from sources other than rivers, with other indicators of flood risk

- No allocations proposed

10.3 SHELAA sites in this category that were not taken forward. The sequential test report should be read in conjunction with the SHELAA report for reasons that the site was not selected, and the SA report for the reasons that these sites did not form a reasonable alternative option,

s0039	s0078	s0480	s0480b	UCS.0601
-------	-------	-------	--------	----------

High Risk of flooding from sources other than rivers, and **no other** indicators of flood risk

10.4 High Risk of flooding from sources other than rivers, and no other indicators of flood risk:

Allocation ref	SHEELA ref	Risk of Flooding from Surface Water			Susceptibility of Groundwater Flooding			Other * More than 10 Sewer Flooding Records in Postcode Area		
	ID	Low	Med	High	Low	Med	High	Low	Med	High*
18-004	s0025	N	N	N	N	Y	Y	Y	N	N
18-005	UCS.0622	N	N	N	N	Y	Y	Y	N	N
18-006	s0101	N	N	N	N	Y	Y	Y	N	N
18-006	s0430	N	N	N	N	Y	Y	Y	N	N
18-006	s0543	N	N	N	N	Y	Y	Y	N	N
18-006	s0544	N	N	N	N	Y	Y	Y	N	N
18-007	s0508	N	N	N	N	Y	Y	Y	N	N
18-010	UCS.0959	N	N	N	N	Y	Y	Y	N	N
18-019	s0030c	N	N	N	N	Y	Y	Y	N	N
18-019	s0106b	N	N	N	N	Y	Y	Y	N	N
18-019	s0528	N	N	N	N	Y	Y	Y	Y	N

10.1 SHELAA sites in this category that were not taken forward. The sequential test report should be read in conjunction with the SHELAA report for reasons that the site was not selected, and the SA report for the reasons that these sites did not form a reasonable alternative option,

s0017	s0032	s0061	s0070	s0377	s0429	s0496	s0499c	s0529a
s0024	s0032b	s0065	s0074	s0401	s0447	s0497	s0506	s0537
s0026	s0032c	s0067	s0088	s0110b	s0459	s0499	s0512	s0549
s0055	s0032d	s0048b	s0102	s0150	s0493	s0499b	s0516	
s0048	s0558	s0048c	s0554	s0280	s0495	s0563	s0550	

High Risk of flooding from sources other than rivers, with other indicators of flood risk

10.2 High Risk of flooding from sources other than rivers, with other indicators of flood risk

Allocation ref	SHEELA ref	Risk of Flooding from Surface Water			Susceptibility of Groundwater Flooding			Other * More than 10 Sewer Flooding Records in Postcode Area		
	ID	Low	Med	High	Low	Med	High	Low	Med	High*
18-013	s0001	Y	Y	Y	N	N	N	N	N	Y
18-028	s0042	Y	Y	Y	N	N	N	N	N	Y
18-020	s0072	Y	Y	Y	N	N	N	N	N	Y
18-001	s0099b	Y	Y	Y	N	Y	Y	N	N	Y
18-011	s0111	Y	Y	Y	Y	N	N	N	N	Y
18-023	s0114	Y	Y	Y	N	N	N	N	N	Y
18-022	s0427b	Y	Y	Y	N	N	N	N	N	Y
18-003	s0433	Y	Y	Y	N	Y	Y	N	N	Y
18-026	s0501b	Y	Y	Y	Y	N	N	N	N	Y
18-021	s0540b	Y	Y	Y	Y	N	N	N	N	Y
18-025	UCS.0022	Y	Y	Y	Y	N	N	N	N	Y

- 10.1 SHELAA sites in this category that were not taken forward. The sequential test report should be read in conjunction with the SHELAA report for reasons that the site was not selected, and the SA report for the reasons that these sites did not form a reasonable alternative option,

s0015	s0045	s0079	s0384	s0483	s0501c	s0520	s0555
s0020	s0046	s0099	s0427	s0487	s0503	s0525	UCS.0617
s0027	s0049	s0109	s0428	s0488	s0503b	s0531	s0490
s0028	s0060	s0221	s0431	s0488b	s0503c	s0535	
s0034	s0071	s0228	s0455	s0494	s0503d	s0540	
s0037	s0072b	s0309	s0461	s0498	s0509	s0547	
s0041	s0073	s0376	s0467	s0501	s0518	s0553	

11. Gypsy and Traveller site allocations

- 11.1 The Local Plan proposes to allocate three sites for gypsy and traveller use. The Council's Gypsy, Traveller, and Travelling Showpeople Needs Assessment 2024 identified a need for 35 new pitches and 19 Travelling Showperson plots, primarily over the early years of the plan period. The result of the various call for sites exercises resulted in **three sites being put forward** for available for gypsy and traveller use, with an indicative combined yield of 30 pitches, and no site were put forward for use for travelling show people. The draft Local Plan therefore proposes to allocate the three available sites. The details of these sites are shown in the Table below. They are all located in Flood Zone 1. Sequentially, there are no other sites promoted as available for this use that the Council could consider in the test. The Regulation 18 consultation is specifically requesting for more sites for this use to be promoted to meet the need identified.
- 11.2 Any further sites that are identified through the Regulation 18 consultation will be introduced in the sequential test. Additionally, as the plan progresses toward Regulation 19, the SFRA Level 2 detailed site assessment will provide further analysis of the sites to determine how (or if) the site can be developed to avoid other flood risk sources - particularly surface water.
- 11.3 Gypsy, Traveller and Travelling Showpeople accommodation is classed as a 'highly vulnerable' user.

Flood Zone 1: Gypsy, Traveller and Travelling Showpeople accommodation allocations

Allocation ref	Risk of Flooding from Surface Water			Susceptibility of Groundwater Flooding			Other * More than 10 Sewer Flooding Records in Postcode Area		
	Low	Med	High	Low	Med	High	Impacted by Historic Flooding	Within 20 Meters Unmodelled Watercourse	Sewer Flooding Records**
Chiseldon Firs	N	Y	Y	Y	N	N	N	N	Y
Land at Quebec Road	Y	Y	Y	Y	N	N	N	N	Y
Rose Lane	Y	Y	Y	N	N	N	N	N	N

Regulation 18 Exception test

- 11.1 Where the Sequential Test has found that it is not possible for development to be located in areas with lower risks of flooding, an Exception Test must be applied to sites with a higher risk of flooding (Flood Zones 2 and 3). Table 2 above identifies when the Exception Test is required. At this stage in the Local Plan formulation, the Council has commissioned a SFRA Level 1 for the Borough which has allowed the Council to take a high-level view of where potential site allocations could meet Exception Test requirements displayed above. SFRA Level 2 will be undertaken to consider exceptions test in more detail. At this stage, the Council has given high level consideration of where sites could meet the exception test requirements.
- 11.2 For a site to pass the Exception Test, it must meet the following two criteria set out in Paragraph 177-179 of the NPPF (2024):
- The development would provide wider sustainability benefits to the community that outweigh the flood risk; and
 - The development will be safe for its lifetime taking account of the vulnerability of its users without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.
- 11.3 Part 1: Wider sustainability benefits
- 11.4 As discussed in section 7, the draft new Local Plan 2043 has been informed by an Interim Sustainability Appraisal report produced by AECOM and the proposed spatial strategy has been judged to be the best performing option against the sustainability appraisal objectives for Swindon Borough. The exception test report should be read in conjunction with the SA report which sets out the reasons that the option presented at Regulation 18 is considered to provide sustainability to the borough.
- 11.5 Part 2: The development will be safe for its lifetime taking account of the vulnerability of its users without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall:
- 11.6 Proposed site allocations are based on the boundary submitted for assessment to the Council through the call for sites. Proposed allocations within Flood Zone 3 may only include small pockets of the site at risk. Further considerations on amending the

proposed site boundaries will be given through the SFRA Level 2 assessment process, ahead of Regulation 19. This would have the effect of altering the Flood Zone that the area proposed for development would sit within.

11.7 The Level 2 assessment will be undertaken following the Regulation 18 consultation. This will provide site specific analysis and would indicate masterplanning opportunities which can be considered for planning policy requirements, and policy requirements could be identified which set out that the developer to undertake a site-specific Flood Risk Assessment to satisfy part 2 of the Exception Test (i.e., the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall). The NPPF also requires that offsite impacts to be taken into account when considering if flood risk would be increased elsewhere, specifically in relation to possible impacts upon essential infrastructure

11.8 Further consultation with the Environment Agency will assist in developing appropriate policy specific criteria.

11.9 The following section details the sites that have been shown through the SFRA to have some element of Flood Zone 2, 3 or climate change modelling suggests that an area of land may be affected by a 1 in 100 year risk of flooding.

Proposed allocations with an element of flood zone 2

- No allocations proposed

Proposed allocations with an element of flood zone 3

11.10 Highest vulnerability of user group: more vulnerable (residential) in all allocations in Flood Zone 3.

Allocation ref	SHEELA ref	Flood Risk from Rivers		Risk of Flooding from Surface Water			Susceptibility of Groundwater Flooding			Other * More than 10 Sewer Flooding Records in Postcode Area		
	ID	Defended 1 in 20/1 in 30	1 in 100 +CC	Low Risk	Medium Risk	High Risk	Low Risk	Medium Risk	High Risk	Impacted by Historic Flooding	Within 20 Meters Unmodelled Watercourse	Sewer Flooding Records*
18-034	s0097	Y	Y	Y	Y	Y	Y	Y	N	Y	N	N
Newburn Sidings		The flood risk mapping shows that a very small element of the scheme is affected along the south eastern boundary, with the affected flood risk area most associated with the recreation ground High profile regeneration site in the town centre which aligns with strategic regeneration goals for the borough Further considerations on amending the proposed site boundaries will be given through the SFRA Level 2 assessment process, ahead of Regulation 19. This would have the effect of altering the Flood Zone that the area proposed for development would sit within. The site is subject to a live planning application and have detailed an SFRA										
18-011	s0112	N	Y	Y	Y	Y	Y	Y	Y	N	Y	N

Crown Timber Site		Only a very small element of the site is affected by Flood Zone 2 and 3, along the north western boundary of the site. Further considerations on amending the proposed site boundaries will be given through the SFRA Level 2 assessment process, ahead of Regulation 19. This would have the effect of altering the Flood Zone that the area proposed for development would sit within. Site located outside of current settlement boundary but located adjacent to NEV strategic site allocation. Site used for light industrial uses. Residential neighbours to east. Opportunity to improve approach into village and integrate into wider NEV scheme, bringing wider benefits to the strategic allocation.											
18-027	s0297	N	Y	Y	Y	Y	Y	Y	N	N	Y	N	
Wroughton Park and Ride (340 units)		The corner of the site is clipped by Flood Zone 2 and 3. Considerations on amending the proposed site boundaries will be given through the SFRA Level 2 assessment process, ahead of Regulation 19. This would have the effect of altering the Flood Zone that the area proposed for development would sit within. wider sustainability benefits to the community that outweigh the flood risk: Vacant park-and-ride site within settlement boundary. Located along key transport corridor.											
18-041	s0371	Y	Y	Y	Y	Y	Y	Y	N	N	N	N	
Green Land, NEV (275 units)		Flood Zone 2 and 3 affects the eastern half of the site. Further considerations on amending the proposed site boundaries will be given through the SFRA Level 2 assessment process, ahead of Regulation 19. This would have the effect of altering the Flood Zone that the area proposed for development would sit within. The Level 2 assessment would also identify master planning opportunities to ensure development is located away from the areas of flood risk. Site located within New Eastern Villages strategic site allocation which in combination is of a significant scale that could bring substantial benefits. Neighbouring sites earmarked for considerable mixed-use development.											
18-039	s0373 s0556	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	
Rowborough NEV The Quest		S0373 which has a pipeline commitment for 2,380 units S0556 The Quest is located within the adopted boundary of the NEV, and is a greenfield parcel associated with an on-site cottage. Opportunity to link development site into larger cluster. Scattered areas of Flood Zone 2 and 3 are located at the north of the site. The Level 2 assessment would also identify master planning opportunities to ovoid development in these area and located development in Flood Zone 1.											

18-040	s0439	Y	Y	Y	Y	Y	Y	Y	N	N	Y	Y
Lotmead and Lower Lotmead		Has planning permission										
18-013	s0440	Y	Y	Y	Y	Y	Y	Y	N	N	Y	Y
Great Stall West (680 units plus mixed use)		Rolled over strategic site allocation. Site located within NEV strategic allocation area and is rolled forward from the existing allocation. The site is a prominent location in the NEV, and the site contains the designated service centre. This site has a significant role in providing the wider community benefits to the NEV and is a central to infrastructure delivery. Flood risk zones 2 and 3 are located at the southern boundary of the site, and the SFRA Level 2, in conjunction with approaches in the adopted plan, would identify master planning opportunities and policy requirements to direct development to Flood Zone 1.										
SGL		Y	Y	Y	Y	Y	Y	Y	N	N	Y	Y
Wichelstowe		Rolled over strategic site allocation. Remainder of the original allocation to be delivered. Wichelstowe has successfully delivered homes and infrastructure in the south of the borough and the completion of development on the site is significant value to the sustainability of the community. In addition to homes, social infrastructure to be provided on site. Subject of an expired planning permission, and submission of a new planning application anticipated. Master planning and site specific policies will guide development away from areas of high flood risk.										
	S0442											
Foxbridge South		Has planning permission										

Climate change allowance (1 in 100 plus climate change allowance)

Allocation ref	SHEELA ref	Flood Risk from Rivers		Risk of Flooding from Surface Water			Susceptibility of Groundwater Flooding			Other * More than 10 Sewer Flooding Records in Postcode Area		
	ID	Defended 1 in 20/1 in 30	1 in 100 +CC	Low Risk	Medium Risk	High Risk	Low Risk	Medium Risk	High Risk	Impacted by Historic Flooding	Within 20 Meters Unmodelled Watercourse	Sewer Flooding Records*
18-042	s0097	Y	Y	Y	Y	Y	Y	N	Y	Y	N	Y
Peploe Land		Has planning permission. Proposed site allocation (s0372 - Peploe Land, NEV) is currently located within Flood Zone 2. However, when factoring in the potential impacts of climate change, the site has been identified through the SFRA Level 1 as being at risk of becoming Flood Zone 3. As such, for the purpose of the sequential and exceptions test, it has been considered as a Flood Zone 3 site, as it falls within the risk of flooding from rivers at a “1 in 100 + CC” category										
18-012	s0523	N	Y	Y	Y	Y	N	N	N	N	N	Y
Land within Meadow Cottage (16 units)		<i>Further clarification with be sought on this site; SFRA Appendix D demonstrates 1-100 plus CC risk; GIS layers provided to the Council do not show this mapped within this site</i> Site located within NEV strategic site allocation. Exiting cottage on site with remaining parcel greenfield. planned change NEV may provide mitigation and improve access to services. Development would need to be phased accordingly. Opportunity to link development site into larger cluster.										
18-033	S0532	N	Y	Y	Y	Y	Y	N	Y	N	N	N
Site at Shaw Village Centre (6 units)		<i>Further clarification with be sought on this site; SFRA Appendix D demonstrates 1-100 plus CC risk; GIS layers provided to the Council do not show this mapped within this site</i> Site located within settlement boundary next to designated local centre. Parcel currently within designated open space. Potential to locate residential next to local services, subject to further assessment on open space.										

12. Summary

- 12.1 This interim report documents the application of the initial sequential assessment that has been undertaken by Swindon Borough Council.
- 12.2 The sequential test has been undertaken in a proportional way to meet the requirements of the NPPF and PPG to ensure that resources were utilised efficiently, and that our housing needs were met through a focused and prioritised approach. This method supports sustainable development and indicates the routes to effective flood risk management that will be explored in greater detail via the SFRA Level 2.
- 12.3 All residential sites are considered to pass the Sequential Test, and where necessary, the exception test. This provides a total capacity 25,822 homes (based on indicative yields) against a requirement of 24,100 homes over the plan period.
- 12.4 All gypsy and traveller sites proposed for allocation are located in Flood Zone 1. All sites are considered to pass the sequential test, in part due to a lack of alternative site allocations available at this time. This provides a total capacity of 30 traveller pitches against a need figure of 35 traveller pitches and 19 Travelling Snowperson plots.
- 12.5 Following the Regulation 18 consultation, further work will be undertaken to arrive at the preferred strategy and set of allocations, which will be presented at Regulation 19 stage (intended for spring 2026). This next stage in the process will be informed by further consultation with the Environment Agency, and through the production of a Level 2 SFRA. This will enable a Sequential and Exception Test to be undertaken in full.

*

Appendix 1 Proforma information for site allocations in Flood Zone 1

1. Flood Zone 1 - Low Risk of flooding from sources other than Rivers

Reg 18 allocation ref	18-016
SLAA ref	S0375
Site name	Land North of Kingsdown Lane
Allocation	Residential
Highest vulnerability of proposed use	More vulnerable
Risk of flooding from Rivers	Very low
Risk of flooding from Surface Water	Low
Risk of flooding from Groundwater	Low
Risk of flooding from Other sources	Very low
Assessment overview	Low risk for surface water flooding and groundwater flooding. It is considered that suitable use of SuDs would alleviate any risk.
Reasonable alternative site/s available in same or lower flood zone	There are no alternative sites at lower risk of flooding – reasons for rejection of alternative sites are covered in the SHELAA (2019) and the Sustainability Appraisal (2019) and are not replicated in this document. There are also no reasonable alternative sites that are consistent with Swindon's town centre regeneration goals.
Summary	The proposed development is compatible with the flood zone and the Sequential Test is deemed to be passed, site recommendations will be considered further in the SFRA Level 2.

Reg 18 allocation ref	18-030
SLAA ref	s0062
Site name	Land south of Highworth Road, Blunsdon
Allocation	Residential
Highest vulnerability of proposed use	More vulnerable
Risk of flooding from Rivers	Very low
Risk of flooding from Surface Water	Very low
Risk of flooding from Groundwater	Low

Risk of flooding from Other sources	Very low
Assessment overview	Low risk for groundwater flooding.
Reasonable alternative site/s available in same or lower flood zone	There are no alternative sites at lower risk of flooding – reasons for rejection of alternative sites are covered in the SHELAA (2019) and the Sustainability Appraisal (2019) and are not replicated in this document. There are also no reasonable alternative sites that are consistent with Swindon's town centre regeneration goals.
Summary	The proposed development is compatible with the flood zone and the Sequential Test is deemed to be passed, site recommendations will be considered further in the SFRA Level 2.

Reg 18 allocation ref	18-029
SLAA ref	s0050b
Site name	Land at Sams Lane (southern part)
Allocation	Residential
Highest vulnerability of proposed use	More vulnerable
Risk of flooding from Rivers	Very low
Risk of flooding from Surface Water	Very low
Risk of flooding from Groundwater	Low
Risk of flooding from Other sources	Very low
Assessment overview	Low risk for groundwater flooding.
Reasonable alternative site/s available in same or lower flood zone	There are no alternative sites at lower risk of flooding – reasons for rejection of alternative sites are covered in the SHELAA (2019) and the Sustainability Appraisal (2019) and are not replicated in this document. There are also no reasonable alternative sites that are consistent with Swindon's town centre regeneration goals.
Summary	The proposed development is compatible with the flood zone and the Sequential Test is deemed to be passed, site recommendations will be considered further in the SFRA Level 2.

Reg 18 allocation ref	18-017
SLAA ref	s0380

Site name	Kingsdown Nursery
Allocation	Residential
Highest vulnerability of proposed use	More vulnerable
Risk of flooding from Rivers	Very low
Risk of flooding from Surface Water	Very low
Risk of flooding from Groundwater	Low
Risk of flooding from Other sources	Very low
Assessment overview	Low risk for groundwater flooding.
Reasonable alternative site/s available in same or lower flood zone	There are no alternative sites at lower risk of flooding – reasons for rejection of alternative sites are covered in the SHELAA (2019) and the Sustainability Appraisal (2019) and are not replicated in this document. There are also no reasonable alternative sites that are consistent with Swindon's town centre regeneration goals.
Summary	The proposed development is compatible with the flood zone and the Sequential Test is deemed to be passed, site recommendations will be considered further in the SFRA Level 2.

Reg 18 allocation ref	18-015
SLAA ref	s0536
Site name	Stubbs Hill Farm
Allocation	Residential
Highest vulnerability of proposed use	More vulnerable
Risk of flooding from Rivers	Very low
Risk of flooding from Surface Water	Very low
Risk of flooding from Groundwater	Low
Risk of flooding from Other sources	Very low
Assessment overview	Low risk for groundwater flooding.
Reasonable alternative site/s available in same or lower flood zone	There are no alternative sites at lower risk of flooding – reasons for rejection of alternative sites are covered in the SHELAA (2019) and the Sustainability Appraisal (2019) and are not replicated in this document. There are also no reasonable alternative sites that are consistent with Swindon's town centre regeneration goals.

Summary	The proposed development is compatible with the flood zone and the Sequential Test is deemed to be passed, site recommendations will be considered further in the SFRA Level 2.
---------	---

Reg 18 allocation ref	18-035
SLAA ref	UCS.0034
Site name	Vacant Bus Depot
Allocation	Residential
Highest vulnerability of proposed use	More vulnerable
Risk of flooding from Rivers	Very low
Risk of flooding from Surface Water	Very low
Risk of flooding from Groundwater	Low
Risk of flooding from Other sources	Very low
Assessment overview	Low risk for groundwater flooding.
Reasonable alternative site/s available in same or lower flood zone	There are no alternative sites at lower risk of flooding – reasons for rejection of alternative sites are covered in the SHELAA (2019) and the Sustainability Appraisal (2019) and are not replicated in this document. There are also no reasonable alternative sites that are consistent with Swindon’s town centre regeneration goals.
Summary	The proposed development is compatible with the flood zone and the Sequential Test is deemed to be passed, site recommendations will be considered further in the SFRA Level 2.

2. Flood Zone 1 - Medium Risk

Reg 18 allocation ref	18-008
SLAA ref	S0519
Site name	Regents Place
Allocation	Mixed use (residential, leisure - retained theatre)
Highest vulnerability of proposed use	More vulnerable
Risk of flooding from Rivers	Very low
Risk of flooding from Surface Water	Medium
Risk of flooding from Groundwater	Very low

Risk of flooding from Other sources	Very low
Assessment overview	<p>Medium risk for surface water flooding at small patches in the centre of the site.</p> <p>The site may be constrained in terms of implementation of infiltration SUDs, and alternative SUDs methods should be considered.</p>
Reasonable alternative site/s available in same or lower flood zone	There are no alternative sites at lower risk of flooding – reasons for rejection of alternative sites are covered in the SHELAA (2025) and the Sustainability Appraisal (2025) and are not replicated in this document. There are also no reasonable alternative sites that are consistent with Swindon’s town centre regeneration goals.
Summary	The proposed development is compatible with the flood zone and the Sequential Test is deemed to be passed, site recommendations will be considered further in the SFRA Level 2.

Reg 18 allocation ref	18-002
SLAA ref	S0480
Site name	North Star House (s0480)
Allocation	Mixed use (residential, leisure - retained theatre)
Highest vulnerability of proposed use	More vulnerable
Risk of flooding from Rivers	Very low
Risk of flooding from Surface Water	Medium
Risk of flooding from Groundwater	Medium
Risk of flooding from Other sources	More than 10 sewer flooding records
Assessment overview	<p>Medium risk for surface water flooding and groundwater</p> <p>The site may be constrained in terms of implementation of infiltration SUDs, and alternative SUDs methods should be considered.</p>
Reasonable alternative site/s available in same or lower flood zone	There are no alternative sites at lower risk of flooding – reasons for rejection of alternative sites are covered in the SHELAA (2025) and the Sustainability Appraisal (2025) and are not replicated in this document. There are also no reasonable alternative sites that are consistent with Swindon’s town centre regeneration goals.
Summary	The proposed development is compatible with the flood zone and the Sequential Test is deemed to be passed, site

	recommendations will be considered further in the SFRA Level 2.
--	---

Reg 18 allocation ref	18-002
SLAA ref	S0480b
Site name	North Star Park
Allocation	Mixed use (residential, leisure - retained theatre)
Highest vulnerability of proposed use	More vulnerable
Risk of flooding from Rivers	Very low
Risk of flooding from Surface Water	Low
Risk of flooding from Groundwater	Medium
Risk of flooding from Other sources	More than 10 sewer flooding records
Assessment overview	Medium risk for groundwater flooding The site may be constrained in terms of implementation of infiltration SUDs, and alternative SUDs methods should be considered.
Reasonable alternative site/s available in same or lower flood zone	There are no alternative sites at lower risk of flooding – reasons for rejection of alternative sites are covered in the SHELAA (2025) and the Sustainability Appraisal (2025) and are not replicated in this document. There are also no reasonable alternative sites that are consistent with Swindon’s town centre regeneration goals.
Summary	The proposed development is compatible with the flood zone and the Sequential Test is deemed to be passed, site recommendations will be considered further in the SFRA Level 2.

3. Flood Zone 1 – High Risk of Flooding from sources other than Rivers

Reg 18 allocation ref	18-001
SLAA ref	s0099c
Site name	North Star
Allocation	Mixed use (residential, swimming pool and transitional employment land)
Highest vulnerability of proposed use	More vulnerable
Risk of flooding from Rivers	Very low
Risk of flooding from Surface Water	High
Risk of flooding from Groundwater	Medium

Risk of flooding from Other sources	Sewer Flooding
Assessment overview	<p>High risk of surface water flooding and groundwater flooding. There have been more than 10 sewer flooding records.</p> <p>The site may be constrained in terms of implementation of infiltration SUDs, and alternative SUDs methods should be considered.</p>
Reasonable alternative site/s available in same or lower flood zone	There are no alternative sites at lower risk of flooding – reasons for rejection of alternative sites are covered in the SHELAA (2025) and the Sustainability Appraisal (2025) and are not replicated in this document. There are also no reasonable alternative sites that are consistent with Swindon’s town centre regeneration goals.
Summary	The proposed development is compatible with the flood zone and the Sequential Test is deemed to be passed, site recommendations will be considered further in the SFRA Level 2.

Reg 18 allocation ref	18-002
SLAA ref	usc.0617
Site name	Polaris House
Allocation	Mixed use (residential)
Highest vulnerability of proposed use	More vulnerable
Risk of flooding from Rivers	Very low
Risk of flooding from Surface Water	High
Risk of flooding from Groundwater	High
Risk of flooding from Other sources	More than 10 sewer flooding records
Assessment overview	<p>High risk for surface water flooding</p> <p>The site may be constrained in terms of implementation of infiltration SUDs, and alternative SUDs methods should be considered.</p>
Reasonable alternative site/s available in same or lower flood zone	There are no alternative sites at lower risk of flooding – reasons for rejection of alternative sites are covered in the SHELAA (2025) and the Sustainability Appraisal (2025) and are not replicated in this document. There are also no reasonable alternative sites that are consistent with Swindon’s town centre regeneration goals.
Summary	The proposed development is compatible with the flood zone and the Sequential Test is deemed to be passed, site

	recommendations will be considered further in the SFRA Level 2.
--	---

Reg 18 allocation ref	18-003
SLAA ref	S0433
Site name	Swindon Station Redevelopment
Allocation	Mixed use (Residential, Offices and Transport Infrastructure (retain Train Station))
Highest vulnerability of proposed use	Essential transport infrastructure (current use - station) More vulnerable
Risk of flooding from Rivers	Very low
Risk of flooding from Surface Water	High
Risk of flooding from Groundwater	High
Risk of flooding from Other sources	Sewer Flooding
Assessment overview	<p>There is an area of High risk for surface water flooding at the eastern boundary of the site.</p> <p>There is High susceptibility to groundwater flooding for property situated below ground level. The actual risk should be considered via site-specific assessment and intrusive investigations.</p> <p>Other flood risk sources: There are more than 10 sewer flooding records.</p> <p>The site may be constrained in terms of implementation of infiltration SUDs, and alternative SUDs methods should be considered.</p>
Reasonable alternative site/s available in same or lower flood zone	There are no alternative sites at lower risk of flooding – reasons for rejection of alternative sites are covered in the SLAA (2025) and the Sustainability Appraisal (2025) and are not replicated in this document. There are also no reasonable alternative sites that are consistent with Swindon's town centre regeneration goals.
Summary	The proposed development is compatible with the flood zone and the Sequential Test is deemed to be passed, site recommendations will be considered further in the SFRA Level 2.

Reg 18 allocation ref	18-004
SLAA ref	S0025

Site name	Bristol Street Carpark
Allocation	Residential
Highest vulnerability of proposed use	More vulnerable
Risk of flooding from Rivers	Very low
Risk of flooding from Surface Water	High
Risk of flooding from Groundwater	High
Risk of flooding from Other sources	None
Assessment overview	<p>There is an area of High risk for surface water flooding at the eastern boundary of the site.</p> <p>There is High susceptibility to groundwater flooding for property situated below ground level. The actual risk should be considered via site-specific assessment and intrusive investigations.</p> <p>The site may be constrained in terms of implementation of infiltration SUDs, and alternative SUDs methods should be considered.</p>
Reasonable alternative site/s available in same or lower flood zone	There are no alternative sites at lower risk of flooding – reasons for rejection of alternative sites are covered in the SLAA (2025) and the Sustainability Appraisal (2025) and are not replicated in this document. There are also no reasonable alternative sites that are consistent with Swindon’s town centre regeneration goals.
Summary	The proposed development is compatible with the flood zone and the Sequential Test is deemed to be passed, site recommendations will be considered further in the SFRA Level 2.

Reg 18 allocation ref	18-005
SLAA ref	UCS.0622
Site name	Faringdon Road/Land at Holbrook Way
Allocation	Residential
Highest vulnerability of proposed use	More vulnerable
Risk of flooding from Rivers	Very low
Risk of flooding from Surface Water	High
Risk of flooding from Groundwater	Very low
Risk of flooding from Other sources	Very low
Assessment overview	High risk for surface water flooding at the south of the site

Reasonable alternative site/s available in same or lower flood zone	There are no alternative sites at lower risk of flooding – reasons for rejection of alternative sites are covered in the SHELAA (2025) and the Sustainability Appraisal (2025) and are not replicated in this document. There are also no reasonable alternative sites that are consistent with Swindon’s town centre regeneration goals.
Summary	The proposed development is compatible with the flood zone and the Sequential Test is deemed to be passed, site recommendations will be considered further in the SFRA Level 2.

Reg 18 allocation ref	18-006
SLAA ref	S0101
Site name	Tented Market
Allocation	Mixed use (residential with town centre uses at Ground floor)
Highest vulnerability of proposed use	More vulnerable
Risk of flooding from Rivers	Very low
Risk of flooding from Surface Water	High
Risk of flooding from Groundwater	Very low
Risk of flooding from Other sources	Very low
Assessment overview	High risk for surface water across the majority of the site
Reasonable alternative site/s available in same or lower flood zone	There are no alternative sites at lower risk of flooding – reasons for rejection of alternative sites are covered in the SHELAA (2025) and the Sustainability Appraisal (2025) and are not replicated in this document. There are also no reasonable alternative sites that are consistent with Swindon’s town centre regeneration goals.
Summary	The proposed development is compatible with the flood zone and the Sequential Test is deemed to be passed, site recommendations will be considered further in the SFRA Level 2.

Reg 18 allocation ref	18-006
SLAA ref	S0430
Site name	Brunel West Car Park and House of Fraser, Swindon
Allocation	Mixed use (residential with town centre uses at Ground floor)
Highest vulnerability of proposed use	More vulnerable
Risk of flooding from Rivers	Very low
Risk of flooding from Surface Water	High

Risk of flooding from Groundwater	Very low
Risk of flooding from Other sources	Very low
Assessment overview	High risk for surface water across the majority of the site
Reasonable alternative site/s available in same or lower flood zone	There are no alternative sites at lower risk of flooding – reasons for rejection of alternative sites are covered in the SHELAA (2025) and the Sustainability Appraisal (2025) and are not replicated in this document. There are also no reasonable alternative sites that are consistent with Swindon's town centre regeneration goals.
Summary	The proposed development is compatible with the flood zone and the Sequential Test is deemed to be passed, site recommendations will be considered further in the SFRA Level 2.

Reg 18 allocation ref	18-006
SLAA ref	S0543
Site name	Brunel Shopping Centre (Regent Street)
Allocation	Mixed use (residential with town centre uses at Ground floor)
Highest vulnerability of proposed use	More vulnerable
Risk of flooding from Rivers	Very low
Risk of flooding from Surface Water	High
Risk of flooding from Groundwater	Very low
Risk of flooding from Other sources	Very low
Assessment overview	High risk for surface water across the majority of the site
Reasonable alternative site/s available in same or lower flood zone	There are no alternative sites at lower risk of flooding – reasons for rejection of alternative sites are covered in the SHELAA (2025) and the Sustainability Appraisal (2025) and are not replicated in this document. There are also no reasonable alternative sites that are consistent with Swindon's town centre regeneration goals.
Summary	The proposed development is compatible with the flood zone and the Sequential Test is deemed to be passed, site recommendations will be considered further in the SFRA Level 2.

Reg 18 allocation ref	18-006
SLAA ref	S0544
Site name	Former House of Fraser and MSCP

Allocation	Mixed use (residential with town centre uses at Ground floor)
Highest vulnerability of proposed use	More vulnerable
Risk of flooding from Rivers	Very low
Risk of flooding from Surface Water	High
Risk of flooding from Groundwater	Very low
Risk of flooding from Other sources	Very low
Assessment overview	High risk for surface water across the some parts of the site
Reasonable alternative site/s available in same or lower flood zone	There are no alternative sites at lower risk of flooding – reasons for rejection of alternative sites are covered in the SHELAA (2025) and the Sustainability Appraisal (2025) and are not replicated in this document. There are also no reasonable alternative sites that are consistent with Swindon’s town centre regeneration goals.
Summary	The proposed development is compatible with the flood zone and the Sequential Test is deemed to be passed, site recommendations will be considered further in the SFRA Level 2.

Reg 18 allocation ref	18-007
SLAA ref	S0508
Site name	The Parade
Allocation	Mixed use (residential with town centre uses at Ground floor)
Highest vulnerability of proposed use	More vulnerable
Risk of flooding from Rivers	Very low
Risk of flooding from Surface Water	High
Risk of flooding from Groundwater	Very low
Risk of flooding from Other sources	Very low
Assessment overview	High risk for surface water mostly across the south eastern half of the site
Reasonable alternative site/s available in same or lower flood zone	There are no alternative sites at lower risk of flooding – reasons for rejection of alternative sites are covered in the SHELAA (2025) and the Sustainability Appraisal (2025) and are not replicated in this document. There are also no reasonable alternative sites that are consistent with Swindon’s town centre regeneration goals.
Summary	The proposed development is compatible with the flood zone and the Sequential Test is deemed to be passed, site

	recommendations will be considered further in the SFRA Level 2.
--	---

Reg 18 allocation ref	18-010
SLAA ref	UCS.0959
Site name	Euclid Street/Civic Campus
Allocation	Mixed use (residential with town centre uses at Ground floor)
Highest vulnerability of proposed use	More vulnerable
Risk of flooding from Rivers	Very low
Risk of flooding from Surface Water	High
Risk of flooding from Groundwater	Very low
Risk of flooding from Other sources	Very low
Assessment overview	There is a small amount of High risk for surface water on part of the site
Reasonable alternative site/s available in same or lower flood zone	There are no alternative sites at lower risk of flooding – reasons for rejection of alternative sites are covered in the SHELAA (2025) and the Sustainability Appraisal (2025) and are not replicated in this document. There are also no reasonable alternative sites that are consistent with Swindon’s town centre regeneration goals.
Summary	The proposed development is compatible with the flood zone and the Sequential Test is deemed to be passed, site recommendations will be considered further in the SFRA Level 2.

Reg 18 allocation ref	18-011
SLAA ref	S0111
Site name	Thornhill Industrial Estate
Allocation	Residential
Highest vulnerability of proposed use	More vulnerable
Risk of flooding from Rivers	Very low
Risk of flooding from Surface Water	High
Risk of flooding from Groundwater	Low
Risk of flooding from Other sources	Sewer Flooding
Assessment overview	High risk for surface water

	There are more than 10 sewer flooding records
Reasonable alternative site/s available in same or lower flood zone	There are no alternative sites at lower risk of flooding – reasons for rejection of alternative sites are covered in the SHELAA (2025) and the Sustainability Appraisal (2025) and are not replicated in this document.
Summary	The proposed development is compatible with the flood zone and the Sequential Test is deemed to be passed, site recommendations will be considered further in the SFRA Level 2.

Reg 18 allocation ref	18-013
SLAA ref	S0001
Site name	Land adjacent to Symmetry Park, A420, South Marston
Allocation	Mixed use (Residential + retention of retail + transitional industrial land)
Highest vulnerability of proposed use	More vulnerable
Risk of flooding from Rivers	Very low
Risk of flooding from Surface Water	High
Risk of flooding from Groundwater	Very low
Risk of flooding from Other sources	Sewer Flooding
Assessment overview	High risk for surface water There are more than 10 sewer flooding records
Reasonable alternative site/s available in same or lower flood zone	There are no alternative sites at lower risk of flooding – reasons for rejection of alternative sites are covered in the SHELAA (2025) and the Sustainability Appraisal (2025) and are not replicated in this document.
Summary	The proposed development is compatible with the flood zone and the Sequential Test is deemed to be passed, site recommendations will be considered further in the SFRA Level 2.

Reg 18 allocation ref	18-019
SLAA ref	S0106b
Site name	Tadpole Triangle
Allocation	Residential
Highest vulnerability of proposed use	More vulnerable
Risk of flooding from Rivers	Very low

Risk of flooding from Surface Water	High
Risk of flooding from Groundwater	Very low
Risk of flooding from Other sources	None
Assessment overview	High risk for surface water
Reasonable alternative site/s available in same or lower flood zone	There are no alternative sites at lower risk of flooding – reasons for rejection of alternative sites are covered in the SHELAA (2025) and the Sustainability Appraisal (2025) and are not replicated in this document.
Summary	The proposed development is compatible with the flood zone and the Sequential Test is deemed to be passed, site recommendations will be considered further in the SFRA Level 2.

Reg 18 allocation ref	18-019
SLAA ref	S0528
Site name	Land off Tadpole Farm
Allocation	Residential
Highest vulnerability of proposed use	More vulnerable
Risk of flooding from Rivers	Very low
Risk of flooding from Surface Water	High
Risk of flooding from Groundwater	Low
Risk of flooding from Other sources	None
Assessment overview	High risk for surface water There is a low risk of groundwater flooding
Reasonable alternative site/s available in same or lower flood zone	There are no alternative sites at lower risk of flooding – reasons for rejection of alternative sites are covered in the SHELAA (2025) and the Sustainability Appraisal (2025) and are not replicated in this document.
Summary	The proposed development is compatible with the flood zone and the Sequential Test is deemed to be passed, site recommendations will be considered further in the SFRA Level 2.

Reg 18 allocation ref	18-019
SLAA ref	S0030c

Site name	Lower Widhill Farm (Hallam option 2)
Allocation	Residential
Highest vulnerability of proposed use	More vulnerable
Risk of flooding from Rivers	Very low
Risk of flooding from Surface Water	High
Risk of flooding from Groundwater	Very low
Risk of flooding from Other sources	None
Assessment overview	High risk for surface water
Reasonable alternative site/s available in same or lower flood zone	There are no alternative sites at lower risk of flooding – reasons for rejection of alternative sites are covered in the SHELAA (2025) and the Sustainability Appraisal (2025) and are not replicated in this document.
Summary	The proposed development is compatible with the flood zone and the Sequential Test is deemed to be passed, site recommendations will be considered further in the SFRA Level 2.

Reg 18 allocation ref	18-020
SLAA ref	S0072
Site name	Land east of Swindon Road, Wroughton (South)
Allocation	Residential
Highest vulnerability of proposed use	More vulnerable
Risk of flooding from Rivers	Very low
Risk of flooding from Surface Water	High
Risk of flooding from Groundwater	Very low
Risk of flooding from Other sources	Sewer Flooding
Assessment overview	High risk for surface water to the eastern third of the site There are more than 10 sewer flooding records
Reasonable alternative site/s available in same or lower flood zone	There are no alternative sites at lower risk of flooding – reasons for rejection of alternative sites are covered in the SHELAA (2025) and the Sustainability Appraisal (2025) and are not replicated in this document.
Summary	The proposed development is compatible with the flood zone and the Sequential Test is deemed to be passed, site recommendations will be considered further in the SFRA Level 2.

Reg 18 allocation ref	18-021
SLAA ref	S05040b
Site name	Berkley (western side)
Allocation	Residential
Highest vulnerability of proposed use	More vulnerable
Risk of flooding from Rivers	Very low
Risk of flooding from Surface Water	High
Risk of flooding from Groundwater	Low
Risk of flooding from Other sources	Sewer Flooding
Assessment overview	High risk for surface water There is low risk of groundwater flooding There are more than 10 sewer flooding records
Reasonable alternative site/s available in same or lower flood zone	There are no alternative sites at lower risk of flooding – reasons for rejection of alternative sites are covered in the SHELAA (2025) and the Sustainability Appraisal (2025) and are not replicated in this document.
Summary	The proposed development is compatible with the flood zone and the Sequential Test is deemed to be passed, site recommendations will be considered further in the SFRA Level 2.

Reg 18 allocation ref	18-022
SLAA ref	S0427b
Site name	Akers Land
Allocation	Residential
Highest vulnerability of proposed use	More vulnerable
Risk of flooding from Rivers	Very low
Risk of flooding from Surface Water	High
Risk of flooding from Groundwater	Very low
Risk of flooding from Other sources	Sewer
Assessment overview	High risk for surface water There are more than 10 sewer flooding records
Reasonable alternative site/s available in same or lower flood zone	There are no alternative sites at lower risk of flooding – reasons for rejection of alternative sites are covered in the SHELAA

	(2025) and the Sustainability Appraisal (2025) and are not replicated in this document.
Summary	The proposed development is compatible with the flood zone and the Sequential Test is deemed to be passed, site recommendations will be considered further in the SFRA Level 2.

Reg 18 allocation ref	18-023
SLAA ref	S0114
Site name	Land at North Wroughton
Allocation	Residential
Highest vulnerability of proposed use	More vulnerable
Risk of flooding from Rivers	Very low
Risk of flooding from Surface Water	High
Risk of flooding from Groundwater	Very low
Risk of flooding from Other sources	Sewer Flooding
Assessment overview	High risk for surface water to the south west corner There are more than 10 sewer flooding records
Reasonable alternative site/s available in same or lower flood zone	There are no alternative sites at lower risk of flooding – reasons for rejection of alternative sites are covered in the SHELAA (2025) and the Sustainability Appraisal (2025) and are not replicated in this document.
Summary	The proposed development is compatible with the flood zone and the Sequential Test is deemed to be passed, site recommendations will be considered further in the SFRA Level 2.

Reg 18 allocation ref	18-024
SLAA ref	S0542
Site name	Marlowe Avenue Regeneration Area
Allocation	Residential led mixed use
Highest vulnerability of proposed use	More vulnerable
Risk of flooding from Rivers	Very low
Risk of flooding from Surface Water	High
Risk of flooding from Groundwater	High
Risk of flooding from Other sources	None
Assessment overview	There are pockets of high risk for surface water across the site

	The GIS mapping shows groundwater risk clipping the boundary of the site
Reasonable alternative site/s available in same or lower flood zone	There are no alternative sites at lower risk of flooding – reasons for rejection of alternative sites are covered in the SHELAA (2025) and the Sustainability Appraisal (2025) and are not replicated in this document.
Summary	The proposed development is compatible with the flood zone and the Sequential Test is deemed to be passed, site recommendations will be considered further in the SFRA Level 2.

Reg 18 allocation ref	18-025
SLAA ref	UCS.0022
Site name	Pipers Way – Intel Campus
Allocation	Residential
Highest vulnerability of proposed use	More vulnerable
Risk of flooding from Rivers	Very low
Risk of flooding from Surface Water	High
Risk of flooding from Groundwater	Low
Risk of flooding from Other sources	Sewer
Assessment overview	There are pockets of high risk for surface water across the site The GIS mapping shows groundwater to the south east site
Reasonable alternative site/s available in same or lower flood zone	There are no alternative sites at lower risk of flooding – reasons for rejection of alternative sites are covered in the SHELAA (2025) and the Sustainability Appraisal (2025) and are not replicated in this document.
Summary	The proposed development is compatible with the flood zone and the Sequential Test is deemed to be passed, site recommendations will be considered further in the SFRA Level 2.

Reg 18 allocation ref	18-026
SLAA ref	S0501b
Site name	Wakefield House
Allocation	Residential
Highest vulnerability of proposed use	More vulnerable
Risk of flooding from Rivers	Very low

Risk of flooding from Surface Water	High
Risk of flooding from Groundwater	Low
Risk of flooding from Other sources	Sewer
Assessment overview	<p>There are pockets of high risk for surface water across the site</p> <p>There is a low risk of groundwater flooding</p> <p>There are more than 10 sewer flooding records</p>
Reasonable alternative site/s available in same or lower flood zone	There are no alternative sites at lower risk of flooding – reasons for rejection of alternative sites are covered in the SHELAA (2025) and the Sustainability Appraisal (2025) and are not replicated in this document.
Summary	The proposed development is compatible with the flood zone and the Sequential Test is deemed to be passed, site recommendations will be considered further in the SFRA Level 2.

Reg 18 allocation ref	18-028
SLAA ref	S0042
Site name	Land at Pentylands Lane, Highworth (Crane Furlong)
Allocation	Residential
Highest vulnerability of proposed use	More vulnerable
Risk of flooding from Rivers	Very low
Risk of flooding from Surface Water	High
Risk of flooding from Groundwater	Very Low
Risk of flooding from Other sources	Sewer
Assessment overview	<p>There is a strip of high risk for surface water along the western boundary of the site</p> <p>There are more than 10 sewer flooding records</p>
Reasonable alternative site/s available in same or lower flood zone	There are no alternative sites at lower risk of flooding – reasons for rejection of alternative sites are covered in the SHELAA (2025) and the Sustainability Appraisal (2025) and are not replicated in this document.
Summary	The proposed development is compatible with the flood zone and the Sequential Test is deemed to be passed, site recommendations will be considered further in the SFRA Level 2.

Reg 18 allocation ref	18-031
SLAA ref	S0036
Site name	Land at Turnpike Road, Blunsdon
Allocation	Residential
Highest vulnerability of proposed use	More vulnerable
Risk of flooding from Rivers	Very low
Risk of flooding from Surface Water	High
Risk of flooding from Groundwater	Low
Risk of flooding from Other sources	Very Low
Assessment overview	There is a strip of high risk for surface water along the western boundary of the site There is a low risk of flooding from groundwater
Reasonable alternative site/s available in same or lower flood zone	There are no alternative sites at lower risk of flooding – reasons for rejection of alternative sites are covered in the SHELAA (2025) and the Sustainability Appraisal (2025) and are not replicated in this document.
Summary	The proposed development is compatible with the flood zone and the Sequential Test is deemed to be passed, site recommendations will be considered further in the SFRA Level 2.

Reg 18 allocation ref	18-032
SLAA ref	S0460
Site name	Land at 12 Turnpike Road, Blunsdon
Allocation	Residential
Highest vulnerability of proposed use	More vulnerable
Risk of flooding from Rivers	Very low
Risk of flooding from Surface Water	High
Risk of flooding from Groundwater	Low
Risk of flooding from Other sources	Very Low
Assessment overview	There is a strip of high risk for surface water along the southwestern boundary of the site
Reasonable alternative site/s available in same or lower flood zone	There are no alternative sites at lower risk of flooding – reasons for rejection of alternative sites are covered in the SHELAA (2025) and the Sustainability Appraisal (2025) and are not replicated in this document.

Summary	The proposed development is compatible with the flood zone and the Sequential Test is deemed to be passed, site recommendations will be considered further in the SFRA Level 2.
---------	---

Reg 18 allocation ref	18-036
SLAA ref	S0527
Site name	Site of former Whitbourne House care home
Allocation	Residential
Highest vulnerability of proposed use	More vulnerable
Risk of flooding from Rivers	Very low
Risk of flooding from Surface Water	High
Risk of flooding from Groundwater	Very Low
Risk of flooding from Other sources	Very Low
Assessment overview	There is an area of surface water at the north of the site
Reasonable alternative site/s available in same or lower flood zone	There are no alternative sites at lower risk of flooding – reasons for rejection of alternative sites are covered in the SHELAA (2025) and the Sustainability Appraisal (2025) and are not replicated in this document.
Summary	The proposed development is compatible with the flood zone and the Sequential Test is deemed to be passed, site recommendations will be considered further in the SFRA Level 2.

Reg 18 allocation ref	18-037
SLAA ref	S0108
Site name	Kingsdown (outline permission)
Allocation	Residential
Highest vulnerability of proposed use	More vulnerable
Risk of flooding from Rivers	Very low
Risk of flooding from Surface Water	High
Risk of flooding from Groundwater	High
Risk of flooding from Other sources	Very Low
Assessment overview	Granted outline permission – refer to application. There is High Risk for surface water flooding on parts of the site.

	There is high risk for groundwater flooding on parts of the site
Reasonable alternative site/s available in same or lower flood zone	There are no alternative sites at lower risk of flooding – reasons for rejection of alternative sites are covered in the SHELAA (2025) and the Sustainability Appraisal (2025) and are not replicated in this document.
Summary	The proposed development is compatible with the flood zone and the Sequential Test is deemed to be passed, site recommendations will be considered further in the SFRA Level 2.

Reg 18 allocation ref	SGL03
Site name	Kingsdown (outline permission)
Allocation	Residential
Highest vulnerability of proposed use	More vulnerable
Risk of flooding from Rivers	Very low
Risk of flooding from Surface Water	High
Risk of flooding from Groundwater	Very Low
Risk of flooding from Other sources	Very Low
Assessment overview	<p>Granted outline permission – refer to application.</p> <p>There is High Risk for surface water flooding on parts of the site.</p> <p>There is high risk for groundwater flooding on parts of the site</p>
Reasonable alternative site/s available in same or lower flood zone	There are no alternative sites at lower risk of flooding – reasons for rejection of alternative sites are covered in the SHELAA (2025) and the Sustainability Appraisal (2025) and are not replicated in this document.
Summary	The proposed development is compatible with the flood zone and the Sequential Test is deemed to be passed, site recommendations will be considered further in the SFRA Level 2.