

From: Planning_THM [REDACTED]
Sent: 27 March 2019 10:54
To: NewLocalPlan
Subject: Consultation on the Proposed Main Modifications to the Wycombe District Local Plan
Attachments: Environment Agency response to Wycombe District Council Local Plan Main modifications.pdf

Dear Aude

Please find attached our response to the above consultation.

Kind regards

Michelle Kidd - Planning Advisor
Area Sustainable Places Team
The Environment Agency

[REDACTED]
[REDACTED]
Web: www.environment-agency.gov.uk

Speak to us early about environmental issues and opportunities - We can provide a free pre-application advice note or for more detailed advice / meetings / reviews we can provide a project manager to coordinate specialist advice / meetings which costs £100 per hour (plus VAT). For more information email us at [REDACTED]



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Ms Aude Pantel
Wycombe District Council
Planning, Transport & Development
Council Offices
Queen Victoria Road
High Wycombe
Buckinghamshire
HP11 1BB

Our ref: WA/2006/000248/CS-
14/EW1-L01

Your ref:

Date: 27 March 2019

Dear Ms Pantel

Main modifications to Wycombe District Council local plan. Post examination. Feb 2019.

Thank you for your consultation on the Wycombe local plan modifications.

The comments below are in response to the main modifications documents you have sent us. I am also following up on the soundness points we made on 27 November 2017 in response to the Regulation 19 submission of your local plan and the examination held in July and September 2018.

Sequential Test

Following the local plan examination in July 2018, please can you clarify whether the justification behind the sequential test has been cross referenced to the Flood Risk Sequential Test Report dated September 2017? Please can you also confirm whether the inspector has accepted the sequential test and whether they consider it to be passed or not.

Site allocation HW15 Land to the rear of Hughenden Road, High Wycombe

We are pleased to see that site allocation HW15 has been deleted from the local plan. This site is in the functional floodplain (Flood Zone 3b) which is defined as land where water has to flow or be stored in times of flood. In nature conservation terms it was not consistent with adopted local plan policy HW15 of the Delivery and Site Allocations Plan.

Strategic Flood Risk Assessment (SFRA)

The soundness points we had for the SFRA have been explained in the Statement of Common Ground between Wycombe District Council, Buckinghamshire County Council and the Environment Agency dated August 2018.

Cont/d..

Paragraph 5.3.215

We made soundness comments about paragraph 5.3.215 in November 2017. We also made some follow up comments for the local plan examination in our letter dated 20 September 2018. These comments were:

“Regarding our soundness comments on paragraph 5.3.215 our soundness representation still applies however we would also like the following sentence deleted.

***5.3.215** Parts of the site are within Flood Zones 2 and 3a, and there is also a risk of surface and ground water flooding. Development of the site must recognise and implement the recommendations of the Level 2 SFRA. De-culverting the stream should be incorporated into these measures, and presents an opportunity to enhance the stream corridor and improve biodiversity, preferably without the need for the new road to cross the stream requiring a culvert. ~~However, some limited culverting may be required in order to achieve an appropriate road alignment.~~*

We think the wording of the policy PR16 itself allows some flexibility regarding culverting. However we would like the last sentence in paragraph 5.3.125 to be deleted as it appears to endorse the consideration of limited new culverting, rather than providing a clear steer that this should be avoided if at all possible by appropriate design.

We are concerned that this is not consistent with adopted policy DM15 of the Wycombe DC Delivery and Site Allocations Plan adopted July 2013 and point 3 of DM15 which states that:

“Opportunities for de-culverting of watercourses should be actively pursued. Planning permission will only be granted for proposals which do not involve the culverting of watercourses and which do not prejudice future opportunities for de-culverting (including on sites specifically identified in High Wycombe town centre).”

The deletion of the above sentence in paragraph 5.3.215 doesn't appear to have been included in the main modifications document. Please can you let us know why this wasn't included?

DM38 Water Quality and Supply

In our response to the Regulation 19 consultation we asked for the following wording to be added to the DM38 policy wording:

*“1. Developments are required to demonstrate how they will be served by adequate infrastructure capacity in terms of water supply, foul drainage, wastewater and sewage treatment, and other utilities, without leading to significant problems for existing users or contamination of waterways (rivers or streams), clean water supply, surface water or groundwater. **“In particular, for those sites where Thames Water have identified capacity constraints in the receiving sewage treatment works and/or sewer network, drainage strategies will need to be provided by the developer. Alongside this the developer should provide evidence that they have consulted with Thames Water to confirm that there is available capacity in place for the increased effluent flow.”***

Please can you let us know whether this text has been included in this policy and if not can it be included in the supporting text for this policy?

Paragraph 6.193

We are pleased to see that you have updated the paragraph which refers to an Environmental Permit for works within 8 metres of a main river. This was formally known as Flood Defence Consent.

Final Comments

Once again, thank you for contacting us. Our comments are based on our available records and the information as submitted to us.

Please quote our reference number in any future correspondence.

If you have any queries please contact me.

Yours sincerely

Miss Michelle Kidd
Planning Advisor

A large black rectangular redaction box covering the signature area of the letter.