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Planning, Transport & Development  
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HP11 1BB

**Our ref:** WA/2006/000248/CS-  
12/EW1-L01  
**Your ref:**  
**Date:** 24 August 2018

Dear Ms Pantel

**Wycombe District Local Plan Examination. Follow up for SFRA issues. August 2018.**

I refer to the meeting dated 20 August 2018 regarding flood risk and the Wycombe District Council local plan site allocations.

These comments relate to our soundness representation regarding the Strategic Flood Risk Assessment (SFRA) for the Wycombe District Council local plan Regulation 19 submission.

In our representation we raised concerns with the soundness of the plan on the following basis:

*“The Strategic Flood Risk Assessment (SFRA) is not sufficient to be sure that the relevant sites pass the second part of the exceptions test. The flood risk modelling is not of sufficient quality to be sure this is possible. Therefore some of the development sites put forward within flood zones 2 and 3 may be undeliverable.  
These sites are:*

- *Former Bassetsbury allotments, Bassetsbury Lane, High Wycombe (Local Plan reference HW13)*
- *1-9 Shaftesbury Street, High Wycombe (no reference)*
- *Hollands Farm (north), Bourne End (BE2)*
- *Slate Meadow, Bourne End (BE1)*
- *Westhorpe House, Little Marlow (RUR11)*
- *Land to the rear of Hughenden Road High Wycombe (HW15)*
- *Little Marlow Lakes Country Park, Little Marlow (RUR4)*
- *Princes Risborough Expansion Area, Princes Risborough (PR3)*
- *Land at Princes Risborough Station, Princes Risborough (PR16)*
- *Land to the rear of Poppy Road, including 108 Wycombe Road, Princes Risborough (PR11)*

Cont/d..

- *Land to the north of Lower Ickniel Way, Longwick. (PR10)*

### Flood Risk Modelling

Since this response the Environment Agency has been continuing an update of our flood modelling for the River Wye and Hughenden Stream. We have now approved this updated model (River Wye and Hughenden Stream Modelling Study, May 2018). Finalised outputs became available for use within the Environment Agency in August 2018. This confirms, for most of the sites above, that the conclusions of the Jacobs flood modelling undertaken for the Level 2 SFRA are correct. Therefore although the method used for the SFRA modelling had significant limitations we are satisfied our latest modelling confirms that flood extents used to assess the sites in the SFRA are adequate.

### Inappropriate development with the functional floodplain

However, the exception to this is the site allocation at Land to the rear of Hughenden Road (Local Plan reference HW15), High Wycombe. Our latest modelling shows that the level of risk at this site is greater than indicated by previous modelling. The latest modelling shows the majority of the site to be at a 20% (1in5) or greater risk of flooding in any given year. We would therefore expect the site to be considered Functional Floodplain (Flood Zone 3b) as defined by Table 1 'Flood risk' the Planning Practice Guidance.

Therefore anything other than 'water compatible' development and 'essential infrastructure' would be inappropriate and undeliverable at this site. We recommend the council or Inspector consider withdrawing or significantly revising this proposed allocation and policy.

### Surface water and groundwater flood risk

Please be aware that there are also concerns regarding surface water and groundwater flood risk at this site (HW15). The Lead Local Flood Authority (Buckinghamshire County Council) should be engaged in relation to any proposals for the site.

### Site allocations within Princes Risborough

The following sites are not affected by the outputs of our new modelling. The watercourses on or near these sites are not included in the new modelling.

- *Princes Risborough Expansion Area, Princes Risborough*
- *Land at Princes Risborough Station, Princes Risborough*
- *Land to the rear of Poppy Road, including 108 Wycombe Road, Princes Risborough*
- *Land to the north of Lower Ickniel Way, Longwick.*

The flood risk at these sites has not been modelled in detail as part of the Level 2 Strategic Flood Risk Assessment. However, national modelling data has been considered in the Level 2 SFRA to demonstrate that the level of flood risk does not prevent the Exception Test being passed in relation to fluvial flooding, as the proposed proportion of more vulnerable development can reasonably be expected to be achievable outside areas of Flood Zones 2 and 3 within the sites. Detailed flood modelling will be required as part of site specific flood risk assessments to confirm this and is acknowledged within the supporting Level 2 SFRA.

At the Princes Risborough Station site and the Princes Risborough Extension site the indicative layouts show proposed roads passing through Flood Zone 3. As acknowledged in the Level 2 SFRA these will need to be carefully designed to remain safe and avoid increasing flood risk. It should be considered whether through detailed design their alignment can be altered to avoid or minimise any encroachment into the floodplain.

Based on this we no longer consider the plan unsound in regard to the quality of flood modelling. However we encourage further consideration of the proposed Rear of Hughenden Road allocation (HW15) and recommend early engagement with the Environment Agency and Lead Local Flood Authority in relation to site specific applications on the other sites where the layout and design of the sites will be important to ensure flood risk is appropriately managed.

### Environmental permit

As pointed out in our letter dated 27 November 2017 we note that section 6.193 of the Local Plan requires updating as works on Main River watercourses are now permitted under the Environmental Permitting Regulations. We recommend the first bullet point is replaced with the following text:

*Any development or works within 8 metres, or in the floodplain, of a Main River may require a permit from the Environment Agency. Further details and guidance are available on the GOV.UK website: <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>.*

### Other points of soundness

The comments above do not alter our representation in relation to the Wycombe District Council Sequential Test. Our representation concerned the soundness of the local plan because it is not clear what weight flood risk has been given in the Sequential Test compared to other constraints such as green belt and therefore whether sites at lower flood risk have been unduly discounted on the basis on non-flood risk constraints. This soundness point was discussed at the Wycombe District Council local plan examination on 25 July 2018.

Please also note that this letter does not alter our soundness representations on ecology and conservation for policy HW15 or policy PR16 and paragraph 5.3.25.

If you have any queries please contact me.

Yours sincerely

**Miss Michelle Kidd**  
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