

Chris Reid  
Wycombe District Council  
Planning and Sustainability  
Council Offices Queen Victoria Road  
High Wycombe  
Buckinghamshire  
HP11 1BB

**Our ref:** WA/2006/000248/SL-  
01/PO1-L01

**Your ref:**

**Date:** 27 November 2009

Dear Chris

**Flood Risk Sequential Test Background Document Paper, Nov 2009.**

Sequential Test for DPD Site Allocations

I am writing to confirm that we accept the above document as demonstration of the PPS25 flood risk sequential test and exceptions test for the sites within it (with the exception of ONP41 and KR1), for the Delivery and Site Allocations DPD.

Further work is required for allocation of the sites ONP41 (Land of Poppy Road) and KR1 (Kingsmead recreation ground). Both sites would need a level 2 SFRA in order to address the requirements of part c) of the exceptions test at a strategic level.

Part c) of the exceptions test says

“a FRA must demonstrate that the development will be safe, without increasing flood risk elsewhere, and where possible, will reduce flood risk overall.

You, the Council, should develop the level 2 SFRA in line with the practice guide to PPS25, and liaison with us. This information should then be fed into this Background Document Paper for the DPD and if it is shown that safe development of either of these sites is not likely to be feasible due to the flood risk, they should not be allocated.

Please contact Simone Esler (01491 828491) to liaise on the production of the level 2 SFRAs.

Sequential Test for Planning Applications

We also accept this document as demonstration of the sequential test for all the sites included, should they come forward as planning applications before the adoption of

Environment Agency  
Red Kite House, Howberry Park, Oxon, Wallingford, OX10 8BD.  
Customer services line: 08708 506 506  
Email: [enquiries@environment-agency.gov.uk](mailto:enquiries@environment-agency.gov.uk)  
[www.environment-agency.gov.uk](http://www.environment-agency.gov.uk)

Cont/d..

the Delivery and Site Allocations DPD. However, this sequential test is a snap shot in time. We recommend that if development comes forward before the adoption of the site allocations, or the DPD adoption is delayed for any considerable period of time, you (the LPA) should satisfy yourselves that the information in this Sequential Test document is still up to date if you intend to accept it to support planning applications.

Development sites which are not identified in this document such as scattered business sites and windfall development will need to apply the sequential test for that individual site at the planning application stage, if they are in areas of flood risk.

The sequential test does not need to be repeated at planning application stage if it has been applied for an adopted site allocation. However the exceptions test will need to be applied at a more detailed level at the planning applications stage. It is within the existing scope of a site specific Flood Risk Assessment to look in more detail at whether the design and layout being proposed for the site, allow it to be developed safely and without increasing flood risk, and reducing flood risk where possible.

We will request a Flood Risk Assessment to support all planning applications for sites within areas of Flood Zone 2 or 3, all sites over 1 hectare, and any development that culverts or obstructs flow in a river or stream designated "main river".

#### Our role in advising on the Sequential Test

PPS25 states that Local Planning Authorities must demonstrate that the Sequential Test has been applied (paragraph 16). Our role is to advise you in this demonstration, as part of our statutory duty as flood risk advisor.

The Sequential Test background paper contains information relating to the wider context of planning matters in Wycombe District, such as the availability of suitable development sites.

We have only advised those elements of the document within our expertise on flood risk and PPS25, and our acceptance of the document is on that basis.

Please do not hesitate to contact us if you have further questions about this matter.

Yours sincerely

**Miss Emily Dartnall**  
**Major Projects Officer**

Direct dial 01491 828344

Direct fax 01491 828302

Direct e-mail [emily.dartnall@environment-agency.gov.uk](mailto:emily.dartnall@environment-agency.gov.uk)