

Wycombe District Council

Date: 19 April 2013

Dear Mr Dewar

DELIVERY AND SITE ALLOCATIONS PLAN: FOR TOWN CENTRES AND MANAGING DEVELOPMENT. PROPOSED MAIN MODIFICATIONS CONSULTATION AND UPDATED SUSTAINABILITY APPRAISAL.

Thank you for your consultation regarding the above local plan document. We received your consultation on 06 March 2013.

We are pleased with and support the following main modification changes which we have asked for in previous representations:

- MM2- HWTC2 - We support the changes to clause 5 and the changes to paragraphs 3.26 and 3.27.
- MM10 – HW2 – We support the changes to the text especially paragraph 2 and the supporting text.
- MM19 – DM10 – We support the changed text in paragraph 6.60.
- MM21 – DM14 - We support the addition of the text at 6.94
- MM22 - DM16 - We support the changes to Part 1b and 2 and 2 parts e, f and g (in principle. Please see comments below).
- MM23 – DM17- We support the change to the policy name to add “and water efficiency.” We also support the new clause 5 and new paragraph 6.119.
- MM24 – We support the amendments to Figure 2 and Maps 1 and 13 to show the culverted sections of the River Wye add the Hughenden Stream.

However we do not agree with the following main modification changes:

MM22 -Part g – We do not agree with the insertion of the wording “where feasible”. If this is because of the reasoning in the new paragraph wording 6.109 about previously contaminated sites then this is not necessary as sustainable drainage refers to a wide range of drainage techniques. Sustainable drainage is not limited to infiltration. By

including the suggested new wording to this policy this may give rise to more cases of developers putting forward reasons for not including compressive SUDS systems.

Other Comments about the Supporting Text for Policy DM16 (MM22)

We wish to draw your attention to the supporting text 6.10 which is not in line with National Planning Policy. The flood risk policy DM16 **does** apply to change of use applications and minor application in accordance with footnote 20 of the National Planning Policy Framework (NPPF).

Regarding the comments about extensions, this should say non-residential extensions that are less than 250 m squared in size **and** householder development. This is set out in footnote 10 of the NPPF Technical Guidance.

For your information, please also be aware that for change of use applications the Environment Agency only want to be consulted on change of use applications in terms of flood risk, which result in an increase in vulnerability in accordance with Table 2 of the NPPF Technical Guidance and the Flood Risk Standing Advice(FRSA) tool on our website at <http://www.environment-agency.gov.uk/research/planning/82584.aspx>

The local planning authorities should follow the Environment Agency Flood Risk Standing Advice as set out in footnote 9 of the NPPF Technical Guidance for advice including, non-residential extensions that are less than 250 m squared in size, householder development and change of use applications.

Yours sincerely

Ms Michelle Kidd
Planning Advisor



For official use only

**Wycombe Delivery and Site Allocations Plan
Consultation on Proposed Main Modifications
March 2013
Representation Form**

Representations must be submitted to Wycombe District Council by **4.45pm on Friday 19th April 2013.**

Representations can be submitted by:

- Email to
- Post to: Planning Policy Team

Please note: Comments can only be submitted in relation to the Proposed Main Modifications and not in relation to the other parts of the DSA Plan that have already been subject to public consultation and have been fully considered during the examination and where no further changes are proposed.

PART A

1. Personal Details

2. Agent's Details (if applicable)

** If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title	<input type="text" value="Ms"/>	<input type="text"/>
First Name	<input type="text" value="Michelle"/>	<input type="text"/>
Last Name	<input type="text" value="Kidd"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text"/>	<input type="text"/>
Line 2	<input type="text"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text"/>
Email Address	<input type="text"/>	<input type="text"/>

1. Personal DetailsTelephone
Number**2. Agent's Details (if applicable)****3. Client Details**

If you are representing a client or specific site interest, please fill in the details below.

Site Interest	
Client's Name	
Client's Address	
Telephone Number	
Email Address	

4. Do you wish to be notified of future stages of the Delivery and Site Allocations Plan, including publication of the Inspector's Report and Adoption?

Yes

No

5. Data Protection and Freedom of Information

Copies of all representations will be submitted to the Planning Inspector, Paul Crysell, who has been appointed to examine the Delivery and Site Allocations Plan. By completing and submitting a response to the Council you are giving your consent to the processing of personal data by Wycombe District Council. You are also accepting that any information received by us, including personal data, may be put into the public domain, including on the Council's website.

PART B – Please copy and use a separate sheet for each representation

Name or Organisation:

The Environment Agency

1. To which Main Modification does this representation relate? (please put MM reference number)

2. Please use this box to set out your comments on the proposed Main Modification. Please set out clearly if you support or disagree with the proposed Main Modification and the reasons supporting your position.

If appropriate, please set out what further change(s) you consider necessary. It will be helpful if you are able to put forward your suggested revised wording of any policy or text.

We are pleased with and support the following main modification changes which we have asked for in previous representations:

- MM2- HWTC2 - We support the changes to clause 5 and the changes to paragraphs 3.26 and 3.27.
- MM10 – HW2 – We support the changes to the text especially paragraph 2 and the supporting text.
- MM19 – DM10 – We support the changed text in paragraph 6.60.
- MM21 – DM14 - We support the addition of the text at 6.94
- MM22 - DM16 - We support the changes to Part 1b and 2 and 2 parts e, f and g (in principle. Please see comments below).
- MM23 – DM17- We support the change to the policy name to add “and water efficiency.” We also support the new clause 5 and new paragraph 6.119.
- MM24 – We support the amendments to Figure 2 and Maps 1 and 13 to show the culverted sections of the River Wye add the Hughenden Stream.

However we do not agree with the following main modification changes:

MM22 -Part g – We do not agree with the insertion of the wording “where feasible”. If this is because of the reasoning in the new paragraph wording 6.109 about previously contaminated sites then this is not necessary as sustainable drainage refers to a wide range of drainage techniques. Sustainable drainage is not limited to infiltration. By including the suggested new wording to this policy this may give rise to more cases of developers putting forward reasons for not including compressive SUDS systems.

(Continue on a expand box /separate sheet if necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations.

Signature:

Date:

17/04/2013