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Planning, Transport & Development
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HP11 1BB

Our ref: WA/2006/000248/SD-
07/PO1-L01

Your ref:

Date: 17 July 2019

Dear Ms Pantel

Princes Risborough Expansion Supplementary Planning Document (SPD). June 2019.

Thank you for your consultation on the above local plan document.

Site constraints summary

The proposed Princes Risborough expansion lies within Flood Zones 1, 2 and 3. There is only a small part of the southern part of the expansion area that lies within Flood Zones 2 and 3. The majority of the area lies within Flood Zone 1. The majority of this site is located over the Upper Greensand and the West Melbury Marly Chalk both Principal Aquifers. Therefore this site is in a sensitive location with respect to groundwater quality. There are past uses of this site that have the potential for contamination. These are a historic landfill site and a sewage treatment works (STW). There is also an ordinary watercourse running through the center of this site.

Fluvial Flood Risk

We are pleased to see that there is no built development proposed in Flood Zones 2 and 3. This sequential approach is in accordance with paragraph 163 of the National Planning Policy Framework.

Groundwater quality and contamination

Our records suggest that there is an historic landfill within this parcel of land (Birkett Electric) that took household and commercial waste. There is also the potential for contamination to be present in the soils on this parcel of land due to the past use of part of the site as a sewage treatment works. The location is different from the current sewage treatment works. Referring to historic maps, a gas works was located on the on the eastern boundary of the site (off site). Therefore the potential for contamination being disturbed during enabling works should be considered for this development site.

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The Development Requirements Section 3.7 Drainage Strategy promotes infiltration drainage. Some of the past uses of this site are contaminative. There should be no infiltration to ground through contaminated land as this could form a pathway for pollution to the underlying groundwater aquifers. This requirement needs to be included in the Development Requirements section. This is supported by paragraph 170 of the National Planning Policy Framework.

The past uses of this site should be investigated in a desk top study and if any contamination is found then a site investigation will be required followed by any necessary remediation. The need for these assessments should also be included in the Development Requirements section. This is supported by paragraph 178 of the National Planning Policy Framework.

Foul drainage

Chapter 7 of the drainage strategy indicates that assumptions have been made that the foul sewer provision for this development will be adopted by Thames Water. There are also uncertainties as to whether the foul system could be gravity fed or require pumping. Given the sensitivity of the Principal Aquifer under this site we require assurances that the provision for foul sewage has been adequately addressed. There should be no foul drainage to ground as this could pollute the underlying groundwater aquifer. This issue needs to be included in the Development Requirements section. This is supported by paragraph 170 of the National Planning Policy Framework.

Green infrastructure, biodiversity and watercourse

The Princes Risborough expansion area has an ordinary watercourse running through it. We are pleased to see that there is a large green corridor to be maintained on either side of the watercourse in Figure 2 Urban Design Framework Plan and Figure 24 Woodland, Hedgerows and Grassland. We are also pleased to see that this green corridor has also maintained a connection to the wider site and outside the site by other green spaces. This is supported by paragraphs 170 and 174 of the National Planning Policy Framework.

Water quality

The Princes Risborough expansion proposes to build 2479 homes by 2033/34.

In the Executive Summary Table 1, 'Other Key infrastructure' the upgrades required for the Princes Risborough sewage treatment works to accommodate the growth predicted need to be included. This is so the capacity at the STW is not exceeded which could have an impact on the receiving watercourses by causing deterioration in water quality. This is supported by paragraph 170 of the National Planning Policy Framework.

In Section 2.1.6 'Infrastructure and Utilities' of the Analysis document it says that upgrades for STW are required in 2020-2025. It should be noted that water industry planning happens on a five yearly cycle and further upgrades may be necessary to accommodate the growth up to 2033/34. This section also states:

“Consideration will also need to be given to maintaining or improving the future water quality of the receiving watercourse relating to the sewage works to meet Water Framework Directive objectives.”

This may require phasing of occupation of buildings and this should be highlighted in

the Summary of Housing and Strategic Infrastructure Delivery table, Appendix 1 and in the Development Requirements section.

Dialogue between the developers and Thames Water should be ongoing throughout the development phases.

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

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