

**JONES-PARRY ASSOCIATES LIMITED**  
*Consulting Civil Engineers*

16 October 2017

Planning Services  
Aylesbury Vale District Council  
The Gateway  
Gatehouse Road  
Aylesbury  
HP19 8FF

Issued via email to devcon@aylesburyvalcdc.gov.uk

Dear Sirs,

**COMMENTS ON BEHALF OF HAMPDEN FIELDS ACTION GROUP ABOUT FLOOD RISK ASPECTS OF PLANNING APPLICATION 16/01040/AOP FOR MIXED USE DEVELOPMENT PROPOSED ON LAND AT ASTON CLINTON, VALP REFERENCE WTV018**

In June THDA Ltd prepared a technical note for Hampden Fields Action Group comprising a review of the Sequential Test included in planning application 16/01040/AOP for the mixed use "Aylesbury Woodlands" development proposed on Draft Local Plan site reference WTV018. The Action Group commented to you attaching that technical note, the conclusion of which was:

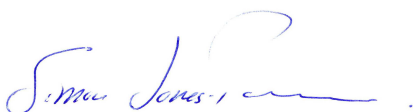
*".. the current situation is that the Sequential Test should not be considered passed. NPPF advises in such circumstances that AVDC must refuse to grant planning permission."*

Hampden Fields Action Group instructed this practice to advise whether documents relevant to risk of flooding at WTV018 that have been published more recently should alter that conclusion. Such documents include the JBA Level 2 SFRA report, the VALP Sequential Test report, the Aecom Cumulative Growth Impact report and the applicant's "Flood Risk Sequential Assessment - Water Compatible Development" report.

Contrary to the advice of the 2015 HELAA that WTV018 is not suitable for residential development due to its extensive flood plain, planning application 16/01040/AOP seeks more development than permanent Flood Zone 1 exists to receive it. To achieve this objective, the developer proposes "flood mitigation measures" to increase the area of permanent Flood Zone 1 at WTV018. However it still wants to build the Eastern Link Road South (ELR (S)) and sports facilities almost entirely on land that will remain functional flood plain (ie liable to flooding at least than once every 20 years on average in today's climate). It is unclear where all the development's surface water storage will be located; it appears some might be put in long term Flood Zone 3, an unsuitable use of such land.

NPPF does not provide for a development to alter Flood Zones using a bespoke flood defence scheme before applying the Sequential Test. Therefore the current draft VALP and the planning application should make their Tests based on a climate changed transformation of today's undefended flood plain. Aecom's illustrative plan of development north of the A41 shows an alternative alignment for the ELR (S) that would serve the overall development in that area much better without it mainly following functional flood plain as the developer says it must. The evidence is clear; the development proposed exceeds site capacity and the THDA Ltd conclusion remains correct. National flood risk policy prevents AVDC from granting consent to 16/01040/AOP.

Yours faithfully



S JONES-PARRY BSc CEng MICE

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cc By email to Phil Yerby, Hampden Fields Action Group