

Q117 What is the reason why the area annotated as “not built development” on the policies map for allocation AGT3 does not coincide more precisely with the extent of fluvial flood risk shown on the Level 2 SFRA maps for the sites which fall within allocation AGT3 (BIE022, WTV017, WTV018 and AST037)?

The non developable areas found in the above site parcels within allocation AGT3 does not coincide precisely with the extent of the fluvial flood risk for the following reasons:

BIE022 – Manor Farm. The southern part and the far eastern parts of the site should be excluded as that part of the site is within Flood Zone 2 and 3 set out in the Level 2 SFRA 2017.

WTV017 - Westonmead Farm, A41 London Road. The northern half of the site is required to remain open for strategic Green Infrastructure purposes and because the narrow envelope straddling the bear brook which is within Flood Zone 2,3 as well as to allow the southern part of the site to represent the settlement pattern.

WTV018 - 'Woodlands' forming most of College Farm, College Road North. The full site is 170 hectares and it is allocated in VALP for 1000 homes. These homes will require approximately 34ha of the site (20% of the gross site area). The Woodlands application 16/01040/AOP identifies a mitigation package to tackle flooding constraints on and off the site which would, once implemented, shrink the flood envelope (the areas of Flood Zone 2, 3a and 3b) and reduce flooding extents on adjacent sites. More vulnerable development could be permitted in Flood Zone 1 (45% of the site). The “not built development” area contained within the proposed VALP Policies Map for Aylesbury on the site D-AGT3 ‘Land North of A41’ is taken from the SFRA Level 2 extents of Flood Zone 2, 3a (with climate change) and which does not show the effect of the potential flood mitigation from the Woodlands Outline planning application/resolution to grant permission subject to s106.

The EA has agreed the flood modelling as part of the planning application for the site. However, there has been some confusion over the indicative drawing in the AECOM Cumulative Impact Assessment which indicates the Eastern Link Road South going through the ‘Woodlands’ site as part of the link road strategy rather than a defined route. The actual road alignments are show within the planning application.

Stakeholder comments on the VALP Sequential Testing made it clear the potential mitigation of the Woodlands planning application and resulting shrinking of the Flood Zone 2,3a and 3b extents should not be taken into account in the VALP Sequential Test. The reason given was that until the planning application and subsequent consents had been obtained, legal agreements signed and works have been carried out, the flood zones will not change. The VALP Sequential Test must be carried out on the existing site using present day flood zones as refined through the SFRA process and accounting for climate change effects. The VALP Policies Map reflects the flood zone 2,3a+ climate change and 3b extents shown in the SFRA with that affected area designated on the VALP Policies Map as “not built development”.

AST037 – Land west side of College Road North, adjacent to the Grand Union Canal. Part of the site lies within flood zone 2 and 3 in the far east.

The areas identified as “not built development” in the proposals map are at a low resolution and so do not coincide exactly with the SFRA flood maps. The proposals map is purely indicative in relation to this matter. Non developable or areas of constraint on site by site parcels will be defined at planning application stages or in any associated master planning.

The site descriptions above are already contained within the site allocation policies.

The Council will modify policy AGT3 criteria (i) as follows:

i. Detailed modelling will be required to confirm flood zone and climate change extents. The Environment Agency and lead local flood authority should be consulted to obtain the latest hydraulic modelling for the site at the time of the flood risk assessment. The highest test of least effect on the floodplain will need to be undertaken to satisfaction of both the Environment Agency and lead local flood authority.