

Aylesbury Vale District Council  
Development Control  
The Gateway  
Gatehouse Road  
Aylesbury  
Buckinghamshire  
HP19 8FF

**Our ref:** WA/2020/128446/01-L01  
**Your ref:** 20/03539/APP  
**Date:** 10 November 2020

Dear Sir/Madam

**Installation of a gas tanker off loading facility for injection of renewable gas into the national gas distribution network.  
Sgn Gas Depot, Bletchley Road, Newton Longville, Buckinghamshire.**

Thank you for your consultation on the above planning application.

#### **Environment Agency position**

In the absence of an acceptable flood risk assessment (FRA) we **object** to this application and recommend that planning permission is refused.

#### **Reasons**

The submitted FRA does not comply with paragraph 163 of the National Planning Policy framework (NPPF) or the requirements for site-specific flood risk assessments, as set out in paragraphs 30 to 32 of the Flood Risk and Coastal Change section of the planning practice guidance. The FRA does not therefore adequately assess the flood risks posed by the development. In particular, the FRA fails to assess whether compensatory flood storage is required for raised finished floor levels within Flood Zone 3.

The FRA states that finished floor levels will be raised within Flood Zone 3 but that ground levels will also be lowered to provide level access from the south to gas download and maintenance bays. However, but the FRA does not provide a comparison of the losses and gains to assess whether there will be an overall loss or gain of flood storage.

This objection is also supported by local plan policy GP.67 of the Aylesbury Vale District local plan. January 2004.

#### **Flood risk vulnerability classification**

The FRA states in section 3.36 that the site is 'Less Vulnerable', however we require

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confirmation that site does not require Hazardous Substances Consent, which would place it within the 'Highly Vulnerable' category in Table 2 'Flood risk vulnerability classification' of the Planning practice Guidance and this would mean we will have an in principle objection to the proposed development as this kind of development would not be appropriate in Flood Zone 3.

### **Overcoming our objection**

To overcome our objection, the applicant should submit a revised FRA which includes a table showing net loss and gains of flood storage at 200mm level bandings across the site. Volume-for-volume and level-for-level storage may then be required in order to ensure no loss of flood storage.

If this cannot be achieved, we are likely to maintain our objection. Please re-consult us on any revised FRA submitted and we'll respond within 21 days of receiving it.

### **Notes to local planning authority regarding decision**

If the Local Authority are minded to grant permission against our recommendation, we request the Local Authority reconsult us for further representation. Please note we may have comments and conditions in other areas of remit following reconsultation.

In accordance with the Planning Practice Guidance (Reference ID: 7-043-20140306), please notify us by email within 2 weeks of a decision being made or application withdrawn. Please provide us with a URL of the decision notice, or an electronic copy of the decision notice or outcome.

### **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**

[Redacted Signature]

E-mail [planning\\_THM@environment-agency.gov.uk](mailto:planning_THM@environment-agency.gov.uk)

cc JMJ Planning Limited