

Matthew Chadwick
Cherwell District Council
Planning & Development Services
Bodicote House White Post Road
Bodicote
Banbury
OX15 4AA

Our ref: WA/2020/127698/02-L01
Your ref: 20/00574/F
Date: 12 June 2020

Dear Matthew Chadwick

Installation of a Standalone Solar PV Array, Associated Infrastructure, Grid Connection, Access and Landscaping

Land North Of Hill Farm, Hill Farm Lane, Duns Tew, OX25 6JJ

Thank you for consulting us on the above application, on 1 June 2020.

We have reviewed the following documents:

Environment Agency Position - Maintain objection

The revised FRA does not satisfactorily address our earlier concerns. We therefore maintain our objection set out in our response dated 27 March 2020.

Reasons

The submitted FRA does not comply with 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:

- consider how a range of flooding events (including extreme events) will affect people and property;
- take the impacts of climate change into account.

The Environment Agency assess development applications based on their red line boundary and the flood zones located within this boundary. This development application contains flood zones 2 and 3 on the site. We request that the applicant undertake detailed flood modelling of the site to determine an accurate climate change flood level for the site and submit this to us for detailed review.

Overcoming our objection

To overcome our objection, the applicant should submit a revised FRA which addresses the points highlighted above and contained in our original objection dated 27 March 2020.

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Specifically, whilst it is acknowledged that all built development is proposed to be located outside of flood zones 2 and 3, the application site (as denoted by the red line boundary) remains in flood zones 2 and 3. The applicant has not determined an accurate climate change flood level for the site.

Based on current Environment Agency climate change guidance, a detailed assessment of climate change should be undertaken for the site. This will take the form of an updated hydraulic model. This will be based on the scale, vulnerability and flood zones attributed to the site (as denoted by the red line boundary) and development. The applicant should use relevant guidance to determine what would be a suitable climate change allowance for the site. The model will need to be submitted to the Environment Agency for review.

As previously advised, if the applicant does not wish to undertake detailed modelling, and wants to adjust the development application so the development site avoids flood zones 2 and 3, then they should consider submitting an alternative application with the site located entirely within Flood Zone 1.

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

Advice for Local Planning Authority

Please be advised that if the applicant is able to overcome our objections we will recommend biodiversity conditions.

If you are minded to approve the application contrary to our objection, please contact us to explain why material considerations outweigh our objection. This will allow us to make further representations. Should our objection be removed, we will recommend the inclusion of flood risk conditions on any subsequent approval.

In accordance with the planning practice guidance (determining a planning application, paragraph 019), please notify us by email within two 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.

We are reliant on the accuracy and completeness of the reports in undertaking our review, and can take no responsibility for incorrect data or interpretation made by the authors.

Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me on the number below.

Yours faithfully

Kirsty Macpherson
Planning Specialist

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