

Lynne Baldwin

From: Planning_THM <Planning_THM@environment-agency.gov.uk>
Sent: 19 April 2024 11:39
To: Dean Swann; Planning; Linda Griffiths
Cc: Katherine Miller; Louise Steele
Subject: RE: 10682 RE: CONSULTATION RESPONSE : 21/01119/OUT Our ref : WA/2021/129037/04

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Dear Dean,

Please accept my apologies for the delay in responding to your email. As I'm sure you know we're incredibly busy at the moment and this means we are experiencing delays.

I've been discussing this with our food risk team and would like to come back to you now with our thoughts. Please see my response (highlighted) to your comments. I trust this succinctly explains what's needed.

Many thanks,

Sarah

Sarah Green

Planning Advisor, Thames Sustainable Places Team
Environment Agency, Red Kite House, Wallingford, OX10 8BD

Planning_THM@environment-agency.gov.uk

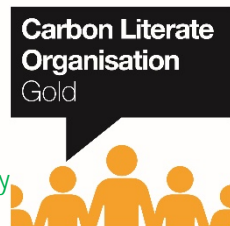
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From: Dean Swann <dean.swann@brookbanks.com>

Sent: Wednesday, March 6, 2024 2:17 PM

To: Planning_THM <Planning_THM@environment-agency.gov.uk>; Green, Sarah <Sarah.Green1@environment-

agency.gov.uk>; CDC Development Management <planning@cherwell-dc.gov.uk>; Linda Griffiths <linda.griffiths@cherwell-dc.gov.uk>

Cc: Katherine Miller <katherine.miller@brookbanks.com>; Louise Steele <Louise.Steele@framptons-planning.com>

Subject: 10682 RE: CONSULTATION RESPONSE : 21/01119/OUT Our ref : WA/2021/129037/04

Hi Sarah,

I refer to your letters dated 16th Jan 2023 WA/2021/129037/03-L01 and 26th of February 2024 WA/2021/129037/04-L01

My client is keen to understand where the EA stand on all this before we commence with further modelling on the site. Effectively we need to understand where the EA will be regardless of the detail in the model we present. It isn't possible to provide you with an answer to this until we've reviewed and agreed any modelling work you've undertaken. At present, there is still no agreed baseline for the site as neither the defended nor undefended range of flood events has been agreed. We have your latest model files and have been asking for a model report which has not been forthcoming.

We don't understand why reference continues to be made the 49% cc scenario, this isn't necessary. Based on the current guidance for considering climate change for this catchment, you should model and map both the higher cc allowance (25%) and central cc allowance (15%) based on detailed site topography. Our best available modelled data shows there is an area of flood zone 3b (functional floodplain) along the river corridor. This is one of the reasons why 25% allowance should be considered. If all development can be accommodated outside of this extent (25%), avoiding the need for compensatory storage for lost floodplain, we would have no issue. If development is being proposed within this baseline extent, a loss of flood storage would occur and this will need to be compensated for and considered given if development within this extent would increase risk to the rail line and station. In this scenario, the compensatory flood storage would need to be designed to the higher cc allowance (25%). This is when a post scheme model would be needed alongside a detailed FRA.

Fundamentally, if we develop the site we have a larger footprint than there is there today. This being the case, any building, will by its very presence, displace more water during an undefended flood event than the site today. The site being a small city centre site is so enclosed, offsetting the volume in the flood plain is simply not going to be viable. Please see above comment. The sequential approach to the layout of the site is the best defence against flooding and our recommended option. If all development can be accommodated outside of the 25% cc extent then no flood storage will be lost. We would insist that no land raising takes place within the cc extent to ensure alterations in ground level doesn't itself lead to a loss of flood storage.

Whatever we present to you in the flood model with a report in the format you have requested fundamentally is going to show two scenarios:

- Defended, the site does not flood in the required 25% event
- Undefended, the site does flood in the required 25% event

There is no getting away from the above outcome and any building of a larger footprint than that shown today is going to displace water in the undefended scenario. Consequently a level for level compensation proposal simply isn't possible. However as you know, the site is allocated and therefore the consideration of the site from a sequential perspective is considered complete. If we move then to the compensation for flood, it should be based on the functional flood plain and the extent of the functional flood plain is the defended scenario. The undefended scenario is only for planning purposes and we have already demonstrated that finished floor levels can be set higher than the 25% event. This latter work shows therefore that the exception test has been applied.

Please see above comments. We are yet to review and agree your flood modelling and until then we're not able to agree the extent of flood risk on site. An allocated site still needs to meet planning tests and policy requirements to ensure flood risk does not increase and development is safe.

So to be clear, what we want to establish is that this latest request for information is purely down to the need to be sure that we have set FFL's to an agreed model for the 1:100 plus 25% event for River modelling in this area. There is not a need to consider compensation for the undefended scenarios.

No this isn't correct, please see first comment. The baseline extent of flood risk for defended and undefended is still outstanding and until this is known, the site layout and design requirements cannot be fully understood.

If you could come back to me on this point asap we will then be able to get on with the model report as requested to move all this forward.

Kind Regards



Dean Swann
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Technical Director

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From: Planning_THM <Planning_THM@environment-agency.gov.uk>
Sent: Monday, February 26, 2024 2:58 PM
To: CDC Development Management <planning@cherwell-dc.gov.uk>; Linda Griffiths <linda.griffiths@cherwell-dc.gov.uk>
Cc: Katherine Miller <katherine.miller@brookbanks.com>; Louise Steele <Louise.Steele@framptons-planning.com>
Subject: CONSULTATION RESPONSE : 21/01119/OUT Our ref : WA/2021/129037/04

Thank you for consulting us on the above application. Please find attached our response.

If you would like to discuss anything contained within the attached letter, please contact me directly.

Please quote our reference number in any future correspondence.

Sarah Green
Planning Advisor, Thames Sustainable Places Team
Environment Agency, Red Kite House, Wallingford, OX10 8BD

Planning_THM@environment-agency.gov.uk
Tel : 0208 474 9253

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