

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

Our ref: WA/2023/130772/01-L01

Your ref: 23/02098/OUT

Date: 15 February 2024

Dear Sir/Madam

Outline Application, With All Matters Reserved, For A Phased (Severable), Comprehensive Residential-Led Mixed Use Development Comprising: Up To 215,000 Square Metres Gross External Area Of Residential Floorspace Within Use Class C3/C4 And Large Houses Of Multiple Occupation (Sui Generis); Supporting Social Infrastructure Including Secondary School/Primary School(S) (Use Class F1); Health, Indoor Sport And Recreation, Emergency And Nursery Facilities (Class E(D)-(F)) Supporting Retail, Leisure And Community Uses, Including Retail (Class E(A)), Cafes And Restaurants (Class E(B)), Commercial And Professional Services (Class E(C)), Local Community Uses (Class F2), And Other Local Centre Uses Within A Sui Generis Use Including Public Houses, Bars And Drinking Establishments (Including With Expanded Food Provision), Hot Food Takeaways, Venues For Live Music Performance, Theatre, And Cinema. Up To 155,000 Net Additional Square Metres (Gross External Area) Of Flexible Employment Uses Including Research And Development, Office And Workspace And Associated Uses (Use E(G)), Industrial (Use Class B2) And Storage (Use Class B8) In Connection With The Expansion Of Begbroke Science Park; Highway Works, Including New Vehicular, Cyclist And Pedestrian Roads And Paths, Improvements To The Existing Sandy Lane And Begbroke Hill Road, A Bridge Over The Oxford Canal, Safeguarded Land For A Rail Halt, And Car And Cycle Parking With Associated Electric Vehicle Charging Infrastructure; Landscape And Public Realm, Including Areas For Sustainable Urban Drainage Systems, Allotments, Biodiversity Areas, Outdoor Play And Sports Facilities (Use Class F2(C)); Utility, Energy, Water, And Waste Water Facilities And Infrastructure; Together With Enabling, Site Clearance, Demolition And Associated Works, Including Temporary Meanwhile Uses.

Begbroke Science Park and Surrounding Land

Did you know that in the UK, 6.6 million tonnes of household food waste a year is thrown away? Almost three quarters of that is food which could have been eaten. Do your bit to avoid domestic food waste to fight climate change! www.lovefoodhatewaste.com www.wrap.org.uk

Thank you for consulting us on the proposed development noted above and thank you for agreeing an additional timeframe for the provision of our comments.

We have reviewed the following documents with regards to our planning remit:

- ES Vol 1 Chapter 16 Water Resources and Flood Risk dated July 2023.
- Appendix 16.1: Flood Risk Assessment (revision P04, dated 19 July 2023 and prepared by Buro Happold)
- Flood modelling files and supporting documentation
- Oxford University Development Begbroke Innovation District Environmental Statement Non-Technical Summary dated November 2023
- ES Vol 1 Chapter 1 Introduction dated July 2023
- EA Vol 3 Appendix 5.5 Outline Landscape and Ecological Management Plan
- ES Vol 1 Chapter 2 Site and Setting dated July 2023
- ES Vol 1 Chapter 3 EIA Methodology dated July 2023
- ES Vol 1 Chapter 3 Description of Development dated July 2023
- ES Vol 1 Chapter 13 Ecology – confidential badger information dated July 2023
- Oxford University Development Begbroke Innovation District Outline CEMP dated November 2023
- ES Vol 3 Appendix 13.2 Ecological Baseline Report Part 2
- ES Vol 3 Appendix 13.2 Ecological Baseline Report Part 3 - Badger information
- ES Vol 3 Appendix 13.2 Ecological Baseline Report Part 4
- ES Vol 3 Appendix 13.2 Ecological Baseline Report Part 5
- ES Vol 3 Appendix 13.2 Ecological Baseline Report Part 6
- ES Vol 3 Appendix 13.2 Ecological Baseline Report Part 7 - Badger information
- ES Vol 3 Appendix 13.2 Ecological Baseline Report Part 9 - Badger information
- ES Vol 3 Appendix 13.2 Ecological Baseline Report Part 10
- ES Vol 3 Appendix 13.2 Ecological Baseline Report Part 11
- ES Vol 3 Appendix 13.2 Ecological Baseline Report Part 12
- ES Vol 3 Appendix 13.2 Ecological Baseline Report Part 13
- ES Vol 3 Appendix 13.2 Ecological Baseline Report Part 14
- ES Vol 3 Appendix 13.2 Ecological Baseline Report Part 15
- ES Vol 3 Appendix 13.2 Ecological Baseline Report Part 16
- EA Vol 3 Appendix 13.3 Biodiversity Net Gain Assessment Part 1
- EA Vol 3 Appendix 13.3 Biodiversity Net Gain Assessment Part 2
- EA Vol 3 Appendix 15.2 Remediation Strategy and Verification Plan dated June 2023 (reference: 19114-HYD-XX-XX-RP-GE-01004-S2-P04).
- ES Vol 3 Appendix 15.1 Desk Study Review and Ground Investigation Part 1 dated June 2023 (reference: 19114-HYD-XX-XX-RP-GE-01002-S2-P08)
- ES Vol 3 Appendix 15.1 Desk Study Review and Ground Investigation Part 2-22
- ES Vol 3 Chapter 15 Ground Conditions and Contamination

The proposed development is within 8 metres of a main river, the Rowel Brook. The river in this location is a migratory route for European Eel, which is a protected species. According to our Flood Map for Planning, the application site lies within Flood Zones 2 and 3, which is land defined by the Planning Practice Guidance (PPG) as having a medium and high probability of flooding respectively. In addition, the application site lies partly within the 3.3% annual exceedance probability (AEP) flood outline which is identified by the as within Flood Zone 3b (the functional floodplain).

Environment Agency position

We have **two objections** to the application as submitted. We therefore recommend that planning permission is refused.

Objection 1 – Flood risk

We **object** to this application because it fails the second part of the flood risk exception test. We recommend that planning permission is refused on this basis.

Reasons

The application site lies within Flood Zones 2 and 3 defined by the National Planning Policy Framework (NPPF) and associated Flood Risk and Coastal Change section of the Planning Policy Guidance (PPG) as having a medium and high probability of flooding. As shown in Table 2 of the PPG, development classified as ‘more vulnerable’ under Annex 3 of the National Planning Policy Framework (NPPF) is only appropriate in Flood Zone 3a if the exception test is passed alongside the sequential test.

The NPPF (paragraph 171) makes it clear that both elements of the exception test must be passed for development to be permitted. Part 2 of the test requires the applicant to demonstrate, via a site-specific flood risk assessment, that the development will be safe, without increasing flood risk elsewhere. Where possible, the development should reduce flood risk overall.

In this instance the developer’s flood risk assessment (revision P04, dated 19 July 2023 and prepared by Buro Happold) fails to:

- demonstrate the flood modelling used within the FRA is appropriate
- demonstrate the sequential approach has been applied and that the development is outside Flood Zones 2 and 3 in accordance with adopted Policy PR8 (Land East of the A44) in the Cherwell Local Plan 2011-2031 (Part 1) Partial Review - Oxfords Unmet Housing Need
- demonstrate the development will not increase flood risk elsewhere
- address the opportunities presented by this development for reducing flood risk

This proposal is therefore contrary to adopted policy ESD 6 in the Cherwell Local Plan 2011-2031 and adopted Policy PR8 (Land East of the A44) in the Cherwell Local Plan 2011-2031 (Part 1) Partial Review - Oxfords Unmet Housing Need.

Flood risk information

We welcome that flood modelling has been undertaken. However, it has not been demonstrated whether the flood modelling provided by the applicant of the baseline and with-scheme scenarios is appropriate to use within an FRA for the proposed development in this location.

The hydrology reporting needs to be improved. There are some sections of the hydrology report that say "to be updated later" which appear to have been forgotten. The report should be updated so that it is good enough for someone to be able to reproduce the calculations. Without this, we are unable to agree the applicant’s hydrology.

Key issues with the hydraulic modelling include:

- Significant issues relating to 1D and 2D channel width representation throughout the model which could influence model results and needs to be addressed.
- The applicant has not provided a survey of the canal – please can this be provided for the next review so that we can assess the assumptions that have been made?

- There is a lack of information as to where elevations have been taken from for the various modifications to the underlying topography e.g. 2d_zsh_TOP_BANK_v12-A_P.shp
- **We have requested the model files associated with the model sensitivity tests for this review but they were not submitted in time for the first review. We welcome that sensitivity tests and site photos have now been submitted and we will review these in any future consultation on this planning application following the submission of further modelling information to overcome our other concerns.**

Please see the attached hydrology and hydraulics spreadsheets for more information on our concerns. If the applicant wishes to respond to feedback on their modelling from the Environment Agency, they should add their comments to, and provide updated copies of, their review documents:

- hydraulic model review spreadsheet (LIT17617)
- flood estimation calculation review spreadsheet (LIT 66039)

We have provided the following comments in relation to our other flood risk concerns. Please be aware that these comments may change should the applicant's modelling be revised to overcome our current concerns.

Sequential Approach

Part 23 of adopted Policy PR8 (Land East of the A44) in the Cherwell Local Plan 2011-2031 (Part 1) Partial Review - Oxfords Unmet Housing Need sets out that '*Residential development must be located outside the modelled Flood Zone 2 and 3 envelope*'. Figure 14 of the submitted FRA shows the 0.1% AEP extent, which is used to define Flood Zone 2, in comparison to the proposed buildings. From this, it is clear that buildings are proposed in existing Flood Zone 2.

To overcome this, the applicant proposes a swale in the northwest of the site and land level changes in the south of the site for the proposed secondary school. This is not in the spirit of the sequential approach, which is '*designed to ensure that areas at little or no risk of flooding from any source are developed in preference to areas at higher risk. This means avoiding, so far as possible, development in current and future medium and high flood risk areas*' in accordance with the PPG.

Flood Zone 3b

Flood Zone 3b (functional floodplain) is where water has to flow or be stored in times of flood and should be safeguarded from development. In accordance with Figure 9 of the FRA, part of the application site is shown to lie within the 3.3% AEP flood outline as so is identified as within Flood Zone 3b (the functional floodplain). This area is in the south of the site near the proposed secondary school. More information is required on what is proposed within this flood extent as it appears in close proximity to land level changes and 'more vulnerable' development, which would be inappropriate in Flood Zone 3b.

In addition, land reprofiling including near the proposed school would alter Flood Zone 3b as it includes infilling a main river and creating a new stretch of river. The proposed swale in the north of the site may also create new areas of Flood Zone 3b. Therefore mapping of the proposed Flood Zone 3b is required, and it should be demonstrated that any development in these areas is appropriate in accordance with Table 2 of the Flood Zone and flood risk tables of the PPG.

Climate change

We welcome that both the central and higher (26% and 41%) 2080's Gloucestershire

and Vale climate change allowances are referenced within the submitted FRA. Section 2.2.3 of the FRA states the higher allowance '*has been considered for all development types*' which we support, for example as flood risk to 'essential infrastructure' such as the A44 could be impacted by the proposed development. We welcome that the FRA assesses impacts on flood risk elsewhere up to the 1% AEP plus 41% CC event.

Finished Floor Levels

Section 4.1.4 of the FRA states '*FFLs and the access road will be set above the DFE flood level with an allowance of 300mm freeboard*'. Whilst we support this in theory, it is not clear from page 22 of the FRA whether the DFE (design flood event) is defined as the 1% AEP plus a 26% or 41% allowance for climate change. Please can the applicant confirm which flood level they are referring to and clearly state the flood level (or in this instance flood level's as this is a relatively large site) in mAOD.

Floodplain storage

In accordance with Figure 17, built development is proposed within the 1% AEP plus a 41% allowance for climate change which would lead to a loss of floodplain storage over the lifetime of the development. This includes areas of proposed 'more vulnerable' development in the northwest and south of the site. To mitigate for this, a swale and land reprofiling is proposed respectively.

Section 4.1.1 states that a swale (plus a 300mm bund/ barrier) is proposed along Woodstock Road to 're-route the flood water' that currently crosses the northwest corner of the site where residential development is proposed. A swale may not provide level for level compensation, and instead is likely to move flood waters from one location to another. It is not clear when comparing Figures 18 and 20 where the floodwater would be relocated to in the proposed scenario with the swale in place, and the swale does not appear to be mapped in these figures. Therefore, we are not satisfied it has been demonstrated the works would not increase flood risk elsewhere. We also have concerns with how this swale has been modelled – please see the attached spreadsheets for details. Please note our maps show a culverted ordinary watercourse passes under this corner of the site, so impacts of the proposed works on flood waters associated with this ordinary watercourse should be investigated in the FRA.

Section 4.1.2 includes details of proposed changes in land levels for the Secondary School site. Figure 22 shows that the proposed changes would increase flood risk outside the red line boundary. Further, the land level changes in the south of the site appear to introduce fluvial flood risk to proposed new dwellings in accordance with Figures 21 and 22 of the FRA. This is contrary to adopted Policy PR8 and would put new dwellings at risk of flooding. Therefore, the proposed development has been shown to increase flood risk elsewhere contrary to Local and National Policy. In principle, we do not support increasing flood risk to new properties and third-party land to reduce flood risk to school playing fields. We note section 2.5 of the FRA states OCC's position on Secondary school sites includes that '*no part of a school site shall be located on Flood Zones 2 or 3*'. However, this should not be achieved by increasing flood risk to dwellings and/or third-party land.

The works include '*filling-in of an existing tributary reach of the southern drainage ditch across the southwest corner of the site*' and a replacement channel. This would involve relocating a main river, therefore a thorough assessment on the impacts of flood risk is required. We have concerns with how the works have been modelled – please see the attached spreadsheets for details.

An area for compensation has been proposed, but no evidence has been provided that this will provide sufficient level for level compensation. We welcome that the applicant intends to include the compensation in their hydraulic model, however level for level compensation calculations are required at this Outline stage to demonstrate that a technically feasible option exists without increasing flood risk elsewhere.

Level for level floodplain compensation is the matching of floodplain storage volumes lost with new floodplain storage volume gained through the reduction of ground levels. We recommend that level for level floodplain storage calculations are provided in a table that sets out the change in volumes across the site using 100mm or 200mm slices (dependent on site specific considerations), stating the losses and gains for each slice. It will need to be demonstrated that there would be no net loss in storage volume for any slice. The location of the changes in floodplain storage should also be clearly identified in a plan or drawing that demonstrates the scheme would be hydraulically connected for each slice.

Excavation of the proposed floodplain compensation scheme should be completed prior to the construction of development to ensure floodplain capacity is maintained.

River crossings

Section 4.1.3 of the FRA states that Stratfield bridge (over the Oxford Canal) is not proposed as part of this outline planning application, however it is included in the planning application description. Please can the applicant confirm whether or not they intend the bridge to be part of any future Reserved Matters application or if a completely separate Full or Outline application would be required?

If the bridge is part of this wider application, further details are required at this stage to ensure that a bridge over the Oxford Canal is theoretically possible without increasing flood risk elsewhere. Please also state whether any other river crossings, including footbridges, are proposed as part of this outline application or a future reserved matters application.

Other works – Roads, paths, substation, landscaping

We note various roads and paths are proposed that would pass through the floodplain. It is not clear whether these would be at existing ground levels or if there would be any landscaping within the floodplain. The impact of new roads, paths and landscaping on flood risk should be assessed, along with any required mitigation measures to prevent increases in flood risk elsewhere. Safe access and egress along these routes should also be assessed.

A Primary substation is referenced in Table 1 of the FRA but no further details are provided. The applicant should assess flood risk from and to any proposed substation. We recommend this is located outside the 1% AEP with a 41% allowance for climate change to ensure it can remain operational in times of flood.

Overcoming our objection

To overcome our objection, the applicant should submit a revised FRA which addresses the points highlighted above. If this cannot be achieved, we are likely to maintain our objection. Please re-consult us on any revised FRA submitted.

Objection 2 – Foul Waste

We **object** to this application as submitted because the proposed development would pose an unacceptable risk of pollution to surface water quality and recommend that

planning permission should be refused on this basis.

Reasons

Paragraph 180 of the National Planning Policy Framework states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of water pollution. In addition, the Thames River Basin Management Plan requires the restoration and enhancement of water bodies to prevent deterioration and promote recovery of water bodies.

Oxford Sewage Treatment Works is a site of significant concern for the Environment Agency. In November 2021 the Environment Agency inspected Oxford STW, which led to Thames Water being issued with a Compliance Assessment Report (C.A.R.). Within this report, some serious and significant permit breaches were identified. While the site is non-compliant with its permit, the risk to the environment remains high.

Oxford STW was identified in 2017 as having insufficient Flow to Full Treatment (FFT) capacity for the population served. It was allocated a U_IMP5 driver for the AMP7 investment period in order to realign the FFT. This was due to be delivered March 2025, however the EA understands this has been delayed by several years. The scheme and deadline are regulatory and legislative commitments, and failure to deliver it on time will potentially lead to further noncompliance at the site. It also presents a significant and ongoing risk to the receiving waterbody, particularly from continued and extended periods of storm overflows. Adding additional flows to the STW before this scheme is completed is not acceptable.

An AMP7 investigation was carried out at Oxford STW to understand the impact of the sewage discharge on Dissolved Oxygen. The investigation concluded that a scheme should be included in AMP 8 (2025-2030) to improve the Dissolved Oxygen status in the Northfield Brook. This was not included in Thames Water's draft business plan submission in October 2023. Without this scheme, there will be an unacceptable risk to deteriorating the Dissolved Oxygen status under the Water Framework Directive (WFD).

Oxford STW suffers greatly from groundwater infiltration and has an associated Groundwater Systems Impacted Management Plan (GISMP). This is partly, but not entirely, due to the brick sewers close to the Thames. The infiltration within the catchment, alongside a complicated pumping regime put the entire network at risk of storm overflows or network failures during times of high(er) flows. Additional load within the network, without improvements, will lead to more storm overflows, pollution incidents and network failures.

Overcoming our objection

The delivery of the AMP 7 scheme is vital to ensuring that Oxford STW has enough capacity to treat incoming flows. We also recommend that the STW is upgraded to meet the expected demands up to the end of the local plan period. Thames Water need to work with the Environment Agency to agree a scheme design, and a realistic and appropriate timescale. Thames Water also need to execute the recommendations of the 2021 CAR form and do everything possible to come back into compliance.

The AMP 8 Dissolved Oxygen scheme should be included in the final business plan submission. Furthermore, continued work on the GISMP to reduce the impact of infiltration in the network is essential.

Environmental permit - advice to applicant

The applicant will require a Flood Risk Activity Permit (FRAP) to undertake the proposed works within 8 metres of main rivers Rowel Brook, Thrupp Ditch and North Yarnton Ditches (called Southern Drainage Ditch in Figure 3 of the FRA) which run through and/or adjacent to the site. Please be aware this includes the infilling of part of the main river North Yarnton Ditches, which is incorrectly identified as only an ordinary watercourse in section 4.3 of the FRA. As submitted, it is **unlikely that a permit would be granted** as it has not been demonstrated the works will not increase flood risk elsewhere. The applicant would need to demonstrate that the proposed works will not adversely impact on flood risk or the watercourse.

The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culverted main river (16 metres if tidal)
- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission

The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on 03708 506 506 (Monday to Friday, 8am to 6pm) or by emailing enquiries@environment-agency.gov.uk.

Sequential test – advice to Planning Authority

What is the sequential test and does it apply to this application?

In accordance with the National Planning Policy Framework (paragraph 162), development in flood risk areas should not be permitted if there are reasonably available alternative sites, appropriate for the proposed development, in areas with a lower risk of flooding. The sequential test establishes if this is the case.

Development is in a flood risk area if it is in Flood Zone 2 or 3, or it is within Flood Zone 1 and your strategic flood risk assessment shows it to be at future flood risk or at risk from other sources of flooding such as surface water or groundwater.

The only developments exempt from the sequential test in flood risk areas are:

- Householder developments such as residential extensions, conservatories or loft conversions
- Small non-residential extensions with a footprint of less than 250sqm
- Changes of use (except changes of use to a caravan, camping or chalet site, or to a mobile home or park home site)
- Applications for development on sites allocated in the development plan through the sequential test, which are consistent with the use for which the site was allocated.

Avoiding flood risk through the sequential test is the most effective way of addressing flood risk because it places the least reliance on measures such as flood defences, flood warnings and property level resilience.

Who undertakes the sequential test?

It is for you, as the local planning authority, to decide whether the sequential test has been satisfied, but the applicant should demonstrate to you, with evidence, what area of search has been used. Further guidance on the area of search can be found in the planning practice guidance [here](#).

What is our role in the sequential test?

We can advise on the relative flood risk between the proposed site and any alternative sites identified - although your strategic flood risk assessment should allow you to do this yourself in most cases. We won't advise on whether alternative sites are reasonably available or whether they would be suitable for the proposed development. We also won't advise on whether there are sustainable development objectives that mean steering the development to any alternative sites would be inappropriate. Further guidance on how to apply the sequential test to site specific applications can be found in the planning practice guidance [here](#).

Exception test – advice to Planning Authority

In accordance with the National Planning Policy Framework (paragraphs 164 and 165), the proposed development is appropriate provided that the site meets the requirements of the exception test. Our comments on the proposals relate to the part of the exception test that demonstrates the development is safe. The local planning authority must decide whether or not the proposal provides wider sustainability benefits to the community that outweigh flood risk.

The exception test should only be applied as set out in flood risk table 3 of the Planning Practice Guidance (PPG) following application of the sequential test. The exception test should not be used to justify the grant of planning permission in flood risk areas when the sequential test has shown that there are reasonably available, lower risk sites, appropriate for the proposed development.

In those circumstances, planning permission should be refused, unless you consider that sustainable development objectives make steering development to these lower risk sites inappropriate as outlined in PPG (ref ID: 7-033-20140306).

Our role in the exception test

The exception test is in two parts, described in the NPPF (paragraph 164). In order for the test to be passed it must be demonstrated that

1. The development would provide wider sustainability benefits to the community that outweigh flood risk; and
2. The development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

Paragraph 165 of the NPPF makes clear that both parts need to be met for the test to be satisfied. It is for the applicant to demonstrate this.

We provide advice on the second part of the test, but it is for you, as the local planning authority, to consider the first part of the test, accounting for the findings of the flood risk assessment and our flood risk advice, and to determine whether the test, overall, has been satisfied. Development that does not satisfy both parts of the exception test should be refused.

Where the flood risk assessment shows the development will be safe throughout its lifetime without increasing flood risk elsewhere

Even where a flood risk assessment shows the development can be made safe throughout its lifetime without increasing risk elsewhere, there will always be some remaining risk that the development will be affected either directly or indirectly by flooding. You will need to weigh these risks against any wider sustainability benefits to the community.

Other Consents – advice to applicant

As you are aware we also have a regulatory role in issuing legally required consents, permits or licences for various activities. We have not assessed whether consent will be required under our regulatory role and therefore this letter does not indicate that permission will be given by the Environment Agency as a regulatory body.

The applicant should contact 03708 506 506 or consult our website to establish if consent will be required for the works they are proposing. Please see <http://www.environment-agency.gov.uk/business/topics/permitting/default.aspx>

Final Comments

Thank you again for consulting us on this application. Our comments are based on the best available data and the information as presented to us. **Subject to our flood risk and foul drainage objections being overcome, we have planning conditions we would recommend in regards to biodiversity and groundwater and contaminated land.**

If you are minded to approve this application for major development contrary to our flood risk objection, we request that you contact us to allow further discussion and/or representations from us in line with the [Town and Country Planning \(Consultation\) \(England\) Direction 2021](#).

This statutory instrument prevents you from issuing planning permission without first referring the application to the Secretary of State for Housing, Communities and Local Government (via the National Planning Casework Unit) to give them the opportunity to call-in the application for their own determination. This process must be followed unless we are able to withdraw our objection to you in writing. A failure to follow this statutory process could render any decision unlawful, and the resultant permission vulnerable to legal challenge.

Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me. Please quote our reference number in any future correspondence.

Yours faithfully

Miss Chloe Alma-Daykin
Planning Advisor

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