

Ms Mary Hudson
Oxfordshire County Council
Planning Implementation
County Hall New Road
Oxford
Oxfordshire
OX1 1ND

Our ref: WA/2021/129358/03-L01
Your ref: MW.0115/21
Date: 21 September 2022

Dear Ms Hudson

***Amended Plan* Extraction And Processing Of Sand And Gravel Including The Construction Of New Site Access Roads, Landscaping And Screening Bunds, Minerals Washing Plant And Other Associated Infrastructure With Restoration To Agriculture And Nature Conservation Areas, Using Inert Fill**

Land At White Cross Farm, Wallingford, Oxfordshire

Thank you for re-consulting us on this application. We have reviewed the documents including the letter Re: Flood Risk Assessment from Edenvale Young to the Environment Agency, dated 15 June 2022.

Environment Agency position

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

Reason

The submitted FRA does not comply with the requirements for site-specific flood risk assessments, in line with paragraph 167 of the National Planning Policy Framework and paragraphs 20 and 22 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

Further explanation

The letter Re: Flood Risk Assessment from Edenvale Young to the Environment Agency, dated 15 June 2022 states the Environment Agency Abingdon Flood Scheme

model was used, but section 6.2 of FRA Revision B states 'limited modifications have been made to the model...' and therefore we would request that the applicant should provide us with model files for review.

The latest model we have is the Thames Sandford to Pangbourne (2018) which only has 25%, 35% and 70% climate change extents so the applicant needs to explain how they have arrived at the 12% allowance.

Also, the development lifespan has been stated as five years but the application includes restoration to agriculture and nature conservation areas. We accept the use of the central climate change allowance but the stated development lifespan does not seem to include the restoration and therefore justification should be provided for the epoch used. The FRA states there will be offsite impacts, so the applicant should provide an assessment of those impacts.

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.

The applicant should also submit the model files in order for us to be able to review the model. I have attached to this letter a **Checklist of items that must be submitted to the Environment Agency for consultation & review.**

Advice to LPA - 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.

Advice to LPA - 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](#).

Advice to LPA - 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](#).

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.

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 would like to recommend the inclusion of condition(s) in relation to groundwater monitoring and groundwater resources 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.

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

Yours sincerely

Mrs Sarah Warriss-Simmons
Planning Advisor

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